



November 1, 2019

Georgia-Pacific Consumer Operations, LLC
Attn: Ms. Melissa Mrotek
Environmental Program Manager
1919 South Broadway
PO Box 19130
Green Bay, WI 54307-9130

Subject: PFAS Sampling Requirements
GP Broadway Mill Expansion, 1919 South Broadway, Green Bay, WI
BRRTS #: 02-05-583452

Dear Ms. Mrotek:

The Wisconsin Department of Natural Resources (DNR) has identified the GP Broadway Mill Expansion site as potentially being a source for per- and polyfluoroalkyl substances (PFAS). DNR believes this emerging contaminant may be present in soil and/or groundwater on the property identified above. The DNR has regulatory authority to ask responsible parties to evaluate hazardous substance discharges and environmental pollution including emerging contaminants:

- Wis. Stat. § 292.01 (3) "Discharge" means, but is not limited to, spilling, leaking, pumping, pouring, emitting, emptying or dumping.
- Wis. Stat. § 292.01 (4) "Environmental pollution" means contaminating ... air, land, or waters of the state or making the same injurious to public health ...
- Wis. Stat. § 292.01 (5) "Hazardous substance" means any substance ... which may pose a substantial present or potential hazard to human health or the environment because of its quantity, concentration or physical, chemical or infectious characteristics ...

Background

This site has been utilized for papermaking purposes since 1919, initially operating as the Fort Howard Paper Company. In 1997, the company was acquired by James River Corp and operated as Fort James. In 2000, Fort James merged with Georgia-Pacific Corporation (GP). An open contamination case with the DNR's Remediation and Redevelopment Program titled GP Broadway Mill Expansion is tracked as BRRTS # 02-05-583452. Soil contamination resulted from a hazardous substance discharge from an unknown source of mainly Polychlorinated Biphenyls (PCBs). The use of PFAS have been associated with the papermaking process both nationally and in Wisconsin; this site may be a source of PFAS contamination.

Site Investigation

Information previously provided for this facility indicates a discharge of PCBs. As stated above, papermaking processes and operations have been historically linked to PFAS use and/or manufacture. Site investigation scoping (Wis. Admin. Code § NR 716.07) and the site investigation work plan (Wis. Admin. Code § NR 716.09) require an evaluation of the history of the facility, previous discharges, and

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GP Broadway Mill Expansion – BRRTS # 02-05-583452

uses on the site that may be associated with discharges of hazardous substances. On June 28, 2019, GP provided a response to a DNR request for additional information regarding PFAS at the facility. The GP response identified only insignificant use during their ownership starting in 2000.

The DNR has the authority under the Wis. Admin. Code NR 700 series to require the evaluation of PFAS at this site. According to Wis. Admin. Code § NR 716.09, the DNR requires that you submit a site investigation work plan that includes an assessment of PFAS, and per Wis. Admin. Code § NR 716.07 (4), all environmental media affected or potentially affected by the contamination must be evaluated.

As stipulated in Wis. Admin. Code § NR 716.07 and Wis. Admin. Code § NR 716.09, the work plan should include a written evaluation of potential PFAS compounds that were historically or are presently produced, used, handled, or stored at the site. The evaluation should include any available information on whether any products containing PFAS were utilized in any production process services, the duration of PFAS use, the type of PFAS utilized, and any areas of the site where PFAS may have been manufactured, used, stored, or discarded. The site investigation work plan must include a groundwater sampling program for evaluating PFAS compounds at the site.

Schedule

The DNR is requesting that you submit a site investigation work plan for PFAS by January 1, 2020.

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding anything outlined in this letter, or would like to arrange a meeting, please contact me, the DNR Project Manager, at (920) 662-5420, or at Keld.Lauridsen@wiscosnin.gov.

Sincerely,



Keld Lauridsen
Hydrogeologist
Remediation & Redevelopment Program

cc: Albert Cole, AECOM (albert.cole@aecom.com)
Jean Romback-Bartels, Secretary's Director, WDNR – Green Bay