

Lauridsen, Keld B - DNR

From: Mrotek, Melissa A <MELISSA.MROTEK@GAPAC.com>
Sent: Monday, January 23, 2023 7:52 AM
To: Lauridsen, Keld B - DNR
Cc: Beaulieu, Jacquelyn Marie; Savale, Michael; Nobile, Trevor W - DNR
Subject: RE: GP Broadway Mill Expansion - PFAS (BRRTS # 02-05-586429)

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Keld – Please see our responses to your comments below in red.

Thanks,
Melissa

From: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>
Sent: Tuesday, November 22, 2022 10:37 AM
To: Mrotek, Melissa A <MELISSA.MROTEK@GAPAC.com>
Cc: Beaulieu, Jacquelyn Marie <jacquelyn.beaulieu@gapac.com>; Savale, Michael <Michael.Savale@tetrattech.com>; Nobile, Trevor W - DNR <Trevor.Nobile@wisconsin.gov>
Subject: GP Broadway Mill Expansion - PFAS (BRRTS # 02-05-586429)

Sent by an external sender

Melissa,

DNR has completed a cursory review of the Summary Report for the recent soil and groundwater sampling at the above referenced site and the following comments are provided:

PFAS investigation:

- Groundwater analytical results should be compared to the proposed ESs/PALs (Cycle 11).
The facility will include this comparison for future submittal of groundwater analytical results.
- The proposed additional round of groundwater sampling for PFAS is acceptable at this time.
The facility proposes to follow previous groundwater sampling site investigation work plans for the 2023 sampling event.
- It is helpful if a delineation of groundwater contamination is provided. It is understood that degree and extent may not be fully defined at this point in time. It is acceptable to depict an incomplete delineation by a dashed line.
The facility will provide an estimated delineation of the groundwater contamination to the extent possible after additional groundwater monitoring events occur.
- The potential for a discharge to surface water and sediment in the Fox River should be evaluated.
The facility will take this into consideration as the investigation continues.

Other contaminants (VOCs, PAHs, metals & PCBs):

- The proposed round of groundwater sampling from select wells for any contaminant found in soil above groundwater pathway RCLs is acceptable at this time.
The facility completed this round of groundwater sampling on January 19th.

- It is helpful if a delineation of soil contamination is provided. It is understood that degree and extent may not be fully defined at this point in time. It is acceptable to depict an incomplete delineation by a dashed line.
The facility will provide an estimated delineation of the soil contamination to the extent possible with the submission of the groundwater sample results from the January 19th sampling event.
- Based on the VOCs found, it should be evaluated if vapor intrusion into any occupied buildings could be a concern per DNR guidance document RR-800.
The facility will conduct this evaluation and will include the results with the submission of the groundwater sample results from the January 19th sampling event.
- It is anticipated that cap maintenance for direct contact and groundwater pathway protection will be required as part of case closure requirements at some point in the future.
Noted.
- The potential for a discharge to surface water or sediment in the Fox River should be evaluated.
The facility will take this into consideration as the investigation continues.

Depending on future findings, additional soil and groundwater sampling will likely be needed to fully define degree and extent of all contaminants found during this ongoing soil and groundwater investigation.

Let me know if you would like to discuss any of the above in more detail.

Thanks,

-Keld

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Keld B. Lauridsen

Phone: (920) 510 8294

Keld.Lauridsen@wisconsin.gov

From: Mrotek, Melissa A <MELISSA.MROTEK@GAPAC.com>
Sent: Friday, November 11, 2022 9:56 AM
To: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>
Cc: Beaulieu, Jacquelyn Marie <jacquelyn.beaulieu@gapac.com>; Savale, Michael <Michael.Savale@tetrattech.com>
Subject: GP Green Bay - PFAS Site Investigation Summary Report

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Keld – please see attached GP Green Bay – PFAS Site Investigation Report (BRRTS #: 02-05-586429). This has also been uploaded to the BRRTS Site. The file is rather large so hopefully it makes it through. Please advise if you will need a hard copy sent.

Thanks,

Melissa Mrotek

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