From: Byrum, Katie <KByrum@mwpaper.com>
Sent: Monday, June 29, 2020 1:30 PM
To: Reif, Maizie L - DNR
Subject: Re: WI SPILL #15424 ID 20200615NE45-1 - PAPER WASTE [WASTEWATER]

Categories: SPILLS, Check

Hi Maizie.
Yes, we cleaned under the docks as planned on Wednesday the 24th. All stock/pulp was cleaned up at that time.

Katie Byrum.

Sent from my iPhone

On Jun 29, 2020, at 1:09 PM, Reif, Maizie L - DNR <Maizie.Reif@wisconsin.gov> wrote:

Hey Katie,

Just wanted to confirm that the in-depth cleaning by Covanta Environmental Solution was completed June 24 as scheduled?

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Maizie Reif
Phone:920-360-4291
Maizie.reif@wisconsin.gov

June 14, 2020 Spill at the OCC pulper

Midwest Paper Group
540 Prospect St
Combined Locks, WI 54113
Contact: Katie Byrum, 920-387-3633

At approximately 5 pm June 14, 2020, the OCC pulper kicked out for about 20 minutes. It filled up above normal operating levels as the water supplies were sequentially shut off. When the system was brought back online after the problems were corrected, the pump that takes pulp out of the pulper did not start up as expected and excess materials exited the top of the pulper.

Reviewing video data, the overflow was not categorized as a constant flow. The OCC manager estimates that 2000 gallons of thick stock (4%) came out of the pulper as water flows were shut down and the pump was started up. Stock ran out the overhead door during the problem solving and clean up efforts.

Looking at the material present from the overhead door at the OCC pulp line and the distance to the storm drain, it is estimated that 38 lbs of recycled box fiber and 226 gallons of process water reached the storm drain. The highest contaminant expected in the process water (after paper fiber) is starch/BOD loading. Styrofoam pellets may have been present at this time. The water source for this process is reclaimed water from the paper machines, but paper machine additives are expected to stay with the paper. Sodium hypochlorite is used as water treatment, but any residuals are quickly consumed in the pulping process.

A storm drain cover was placed over the drain to prevent any further loss of materials. About a one inch thick mat of paper fiber had built up over the drain, providing a natural filtering action to keep solids out of the drain. Covanta Environmental Solutions was onsite Tuesday June 16 to clean up the courtyard. They are scheduled back June 24 to do an in-depth cleaning under the docks. A temporary gravel berm has been placed to keep any solids from washing to the storm sewer during any rain events in the interim.

Corrective Actions Taken as a Result of this Event:

- Storm drains painted orange with wording that they discharge straight to the river for increased visibility
- Discussions with crews emphasizing the importance of keeping spills within the building and our drain system connected to our onsite wastewater treatment plant
- Pallet of sandbags to be stored in the Drott building (nearby garage-type building)

Katie Byrum
6/19/20

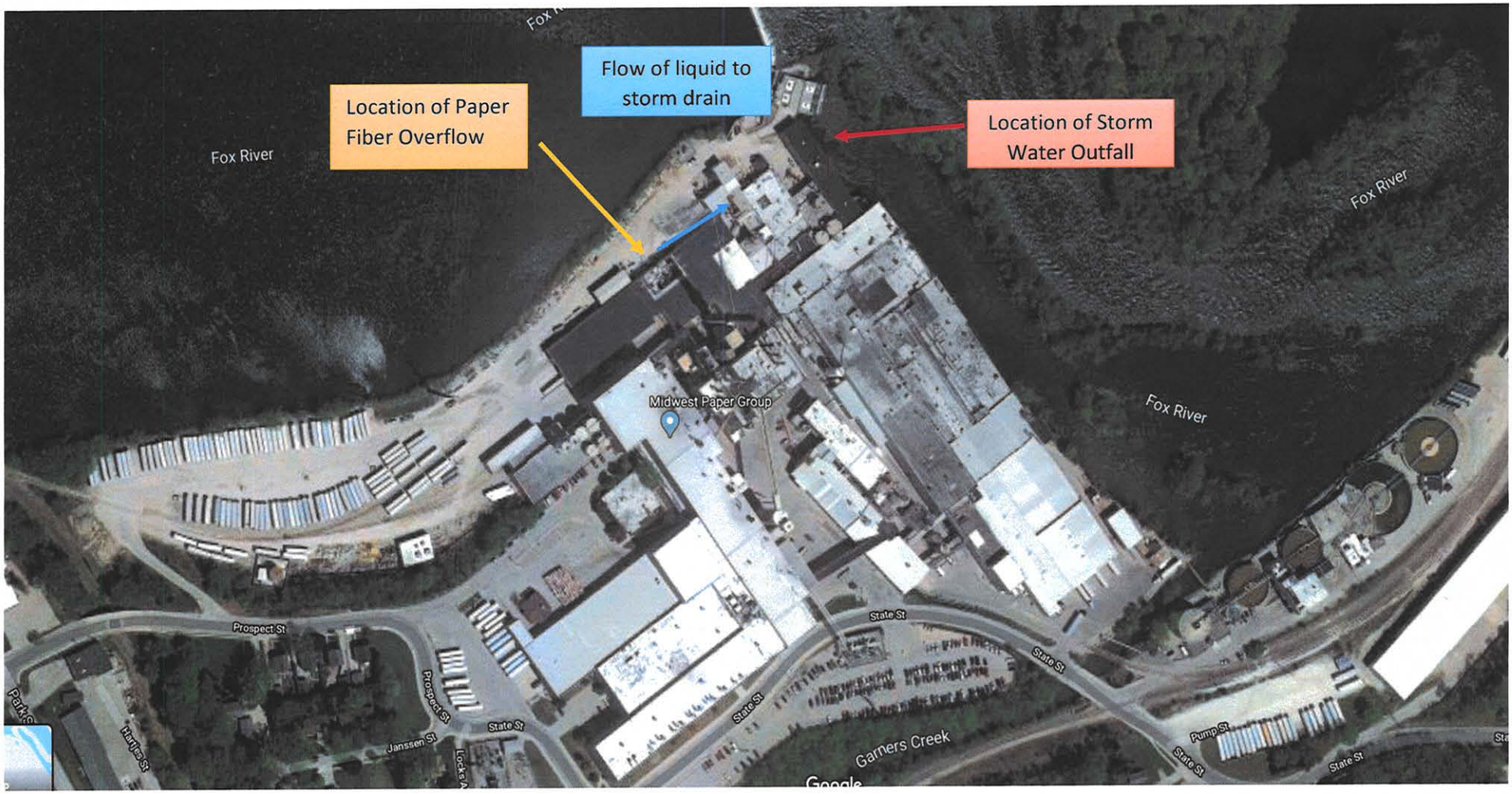
Stock Spill 6/14/20 – 5pm

Midwest Paper Group, 540 Prospect St, Combined Locks, WI 54113

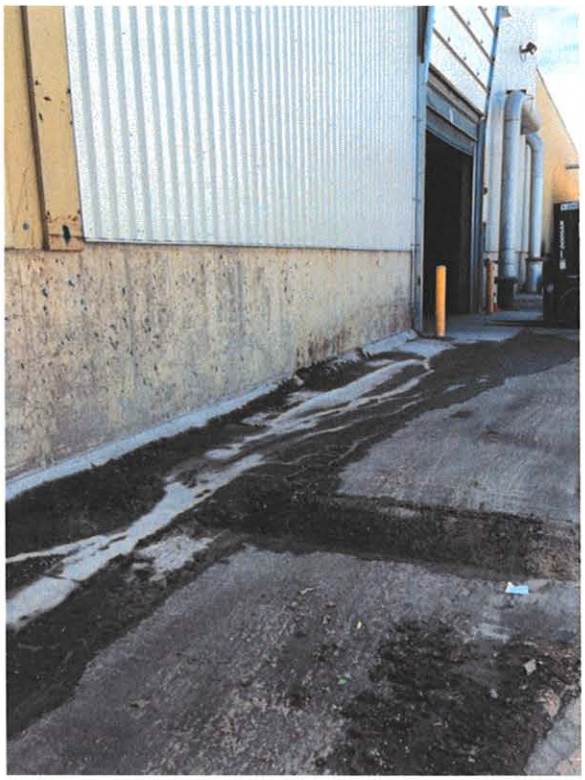
Yellow = location of paper fiber (stock) overflow

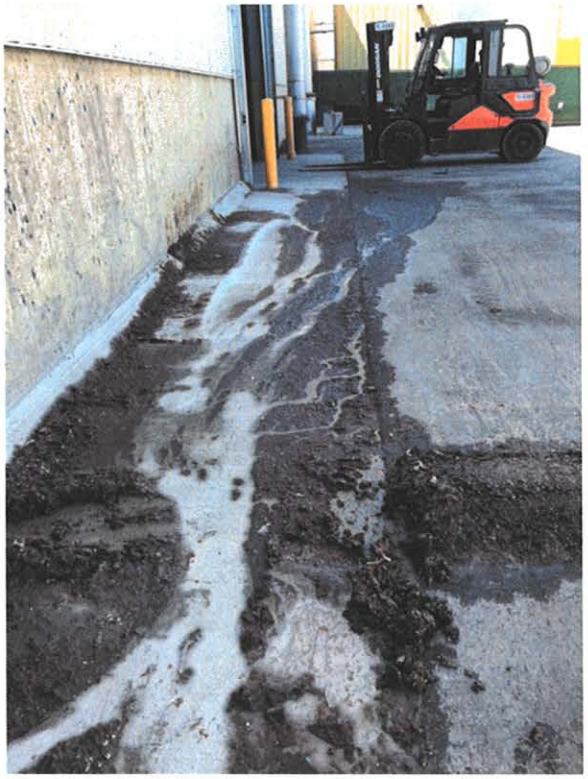
Light blue = stock flow from OCC recycle overhead door to storm sewer in courtyard

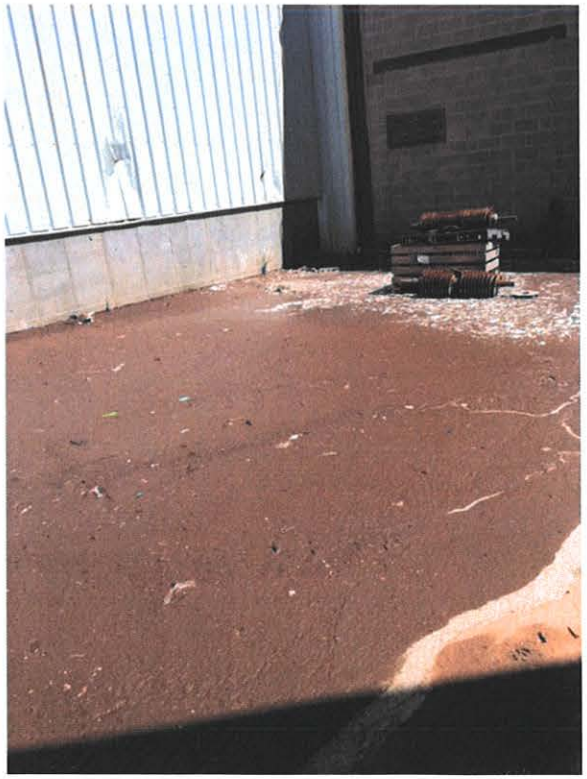
Red = storm water drain location

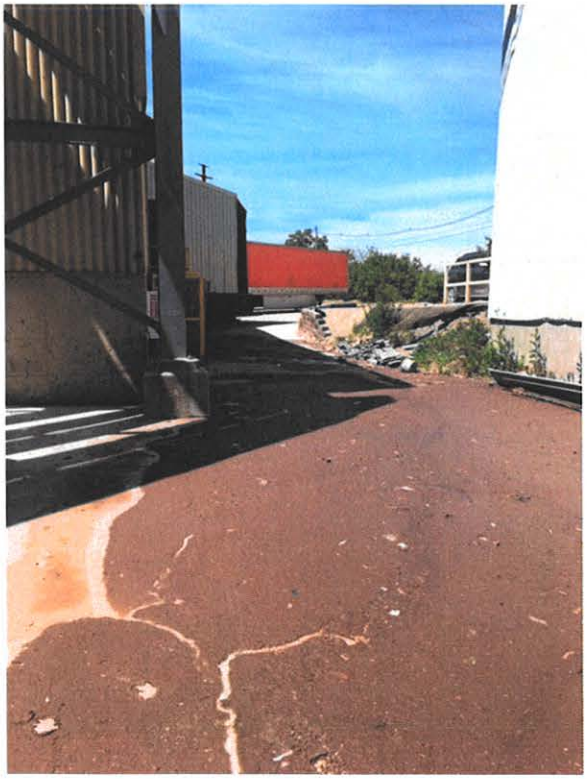


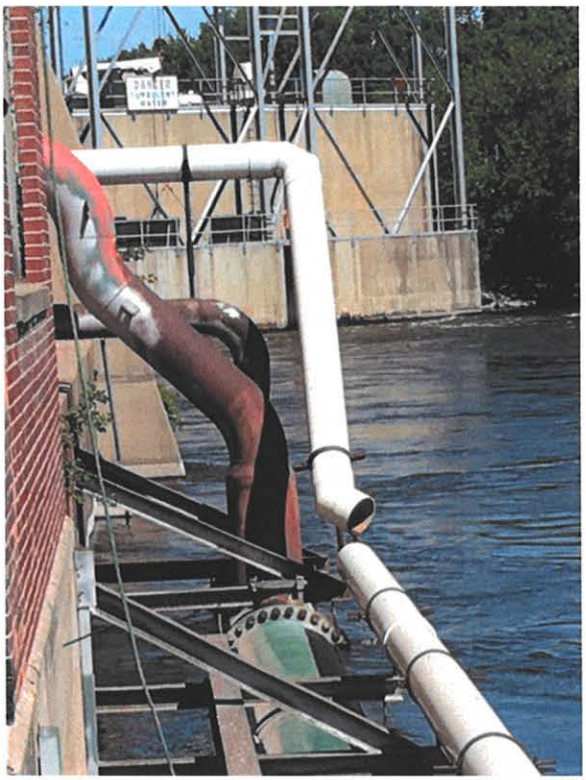
June 14 2020 Stock spill – approx. 5pm. Pics taken June 15, 2020 – approx. 10 am

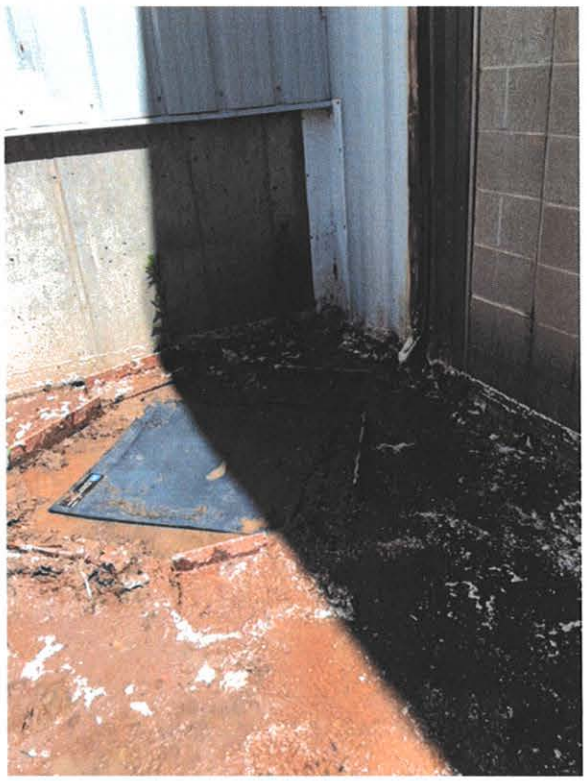












June 16, CoVanta in to clean up the stock in the courtyard.

June 19 2020 – painted sewer drains, rock berm, stock under dock to be cleaned up 6/24/20

OCC pulper overflow
6/14/20 about 5pm

The OCC pulper kicked out and was down for 20 minutes.
On start up, the pump pulling out of the pulper didn't turn on.
Video review shows that it wasn't a deluge coming out of the pulper.
It was described as raining out of the pulper

Estimate from OCC area manager is that we lost 2000 gal at 4% consistency

2000	gal
4%	consistency

Volume of space under the truck docks

0.416667	ft deep (5")
8	ft wide
50	ft long
167	ft^3 caught under the docks
1247	gal
753	gal past truck dock
251	lbs of fiber
85%	estimated fiber stuck to the courtyard
38	lbs fiber to the storm drain before it blinded over
226	gallons of process water estimated to go down the drain

trace materials in the recycled water sytems

- hypochlorite - typically consumed by materials introduced in the pulp process
- styrofoam pellets
- starch - there is some BOD load in this process water

From: Byrum, Katie <KByrum@mwpaper.com>
Sent: Friday, June 19, 2020 1:50 PM
To: Gerold, Laura A - DNR; Reif, Maizie L - DNR
Cc: Corrigall, John; Yoder, Jeff; Bassindale, Dan
Subject: RE: WI SPILL #15424 ID 20200615NE45-1 - PAPER WASTE [WASTEWATER]
Attachments: 2020 Jun 14 Spill Final Report.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: SPILLS

Hi Laura,
Attached is a summary report of the incident. Based on the information below, I would like the following edits/updates:

Substance:
PAPER WASTE [WASTEWATER] Pulp from the paper making process
Released Amt: UNKNOWN 2000 gallon
Recovered Amt: UNKNOWN 1774 gallon
(Amounts are often estimated)

Environmental Impact:
AN UNKNOWN AMOUNT OF PAPER FIBER AND WATER MADE IT'S WAY INTO THE FACTORY STORM DRAIN WHICH LEADS DIRECTLY TO THE FOX RIVER. REST OF WASTE IS ON A HARD PAVED AREA NOT PENETRATING GRAVEL OR GROUND. TOTAL AMOUNT OF WASTE IS UNKNOWN.
Please replace "waste" with "pulp"

Per your questions below, there are minimal process chemicals present – the water is recycled from the paper machine and most of the chemicals are retained in the paper. The main "chemical" present would be starch/BOD loading from the recycled box board. A small amount of sodium hypochlorite is used for water disinfection, but it is very quickly consumed in the pulping process. Small styrofoam beads were present, but they float so some may have gone into the sewer and some were trapped in the stock on the pavement.

As discussed on the phone Wednesday, the spill happened at 5pm Sunday 6/14 and the foam was reported at 7am Tuesday. Clean up of the spill in the courtyard area started about 9:30 am Tuesday and the sewer cover was left over the drain until clean up was complete. Our water treatment guy did notice foam at the river, and it was on the other side of the island from both the spill discharge point and the wastewater treatment plant discharge. This would not be related.

Please let me know if there are any questions.

Katie Byrum
Environmental Manager
Midwest Paper Group
920 687 3633 office
920 202 6336 cell

KByrum@mwpaper.com

-----Original Message-----
From: Gerold, Laura A - DNR [mailto:laura.gerold@wisconsin.gov]
Sent: Tuesday, June 16, 2020 6:11 PM
To: Byrum, Katie <KByrum@mwpaper.com>
Subject: FW: WI SPILL #15424 ID 20200615NE45-1 - PAPER WASTE [WASTEWATER]

Katie:

I was forwarded a Spill Report for the facility. You fulfilled item 6.2.7 Spill Reporting for your WPDES permit, but still need to fulfill item 6.2.1 Noncompliance Reporting. A written report should be submitted within 5 days after the permittee has become aware of the noncompliance. This written report can be a detailed email to me that includes a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times; the steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance; and if the noncompliance has not been corrected, the length of time it is expected to continue.

The Spill Coordinator would also like to know what chemicals could potentially be in the water in the spill. Is it just paper fiber and water or were there any chemicals added at this point?

We also received a public complaint this morning that there was foam in the river near your outfalls at 7 AM. Would there be anything in the spill that could have caused the foaming problem?

Thank-you and please let me know if you have any questions.

Laura

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Laura Gerold, PE
Phone: (920) 662-5426
laura.gerold@wisconsin.gov

-----Original Message-----
From: Schmitt Marquez, Heidi S - DNR <Heidi.SchmittMarquez@wisconsin.gov>
Sent: Tuesday, June 16, 2020 11:41 AM
To: Gerold, Laura A - DNR <laura.gerold@wisconsin.gov>
Subject: FW: WI SPILL #15424 ID 20200615NE45-1 - PAPER WASTE [WASTEWATER]

-----Original Message-----
From: tabitha.stanek@wisconsin.gov <tabitha.stanek@wisconsin.gov>
Sent: Monday, June 15, 2020 4:43 PM
To: Schmitt Marquez, Heidi S - DNR <Heidi.SchmittMarquez@wisconsin.gov>
Subject: WI SPILL #15424 ID 20200615NE45-1 - PAPER WASTE [WASTEWATER]

SERTS ID:
20200615NE45-1

Reported:
06/15/2020 16:30

Occurred:
06/14/2020 17:00

Substance:
PAPER WASTE [WASTEWATER]
Released Amt: UNKNOWN
Recovered Amt: UNKNOWN
(Amounts are often estimated)

Reported by:
KATIE BYRUM
EVVIRONMENTAL MANGAGER
MIDWEST PAPER GROUP
kbyrum@mwpaper.com
(920) 687-3633

Location:
NE REGION
OUTAGAMIE COUNTY
COMBINED LOCKS, CITY OF
MIDWEST PAPER GROUP
540 PROSPECT ST
IN MILL

Responsible Party:
MIDWEST PAPER GROUP
COMBINED LOCKS, WI
(920) 687-3633

RP Contact:
KATIE BYRUM
(920) 687-3633
kbyrum@mwpaper.com

Cause:
OVERFILL (STORAGE TANK, VEHICLE OR EQUIPMENT)

Cause Description:
FACTORY TANK WAS OVERFILLED WHICH LED TO THE SPILL OF PAPER FIBER AND WATER IN THE FACTORY.

Environmental Impact:

AN UNKNOWN AMOUNT OF PAPER FIBER AND WATER MADE IT'S WAY INTO THE FACTORY STORM DRAIN WHICH LEADS DIRECTLY TO THE FOX RIVER. REST OF WASTE IS ON A HARD PAVED AREA NOT PENETRATING GRAVEL OR GROUND. TOTAL AMOUNT OF WASTE IS UNKNOWN.

Weather:
SUNNY

Comments:
KATIE BYRUM HAD MADE CONTACT WITH SPILL COORDINATOR MAIZIE REIF BEFORE CALLING DNR SPILL HOTLINE.

Cleanup:
COMPANY HAS COVERED STORM DRAIN SO NO FURTHER WASTE CAN GO DOWN TO THE FOX RIVER AND THERE IS A CREW COMING IN TOMORROW MORNING 6/16 TO START THE CLEAN UP PROCESS.

Notified SW MAIZIE REIF at 16:40 by Phone

Submitted by:
TABITHA STANEK
(608) 267-7691
tabitha.stanek@wisconsin.gov

Sent to:
beth.olson@wisconsin.gov
caroline.rice@wisconsin.gov
christine.haag@wisconsin.gov
christopher.saari@wisconsin.gov
clara.jeong@dhs.wisconsin.gov
curtis.hedman@dhs.wisconsin.gov
david.neste@wisconsin.gov
denise.danelski@wisconsin.gov
dmawemdutyofficer@wisconsin.gov
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paula.rieder@outagamie.org
philip.richard@wisconsin.gov
richard.joslin@wisconsin.gov
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roxanne.chronert@wisconsin.gov
roy.irving@dhs.wisconsin.gov
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stephend.mueller@wisconsin.gov
steve.fenske@wisconsin.gov
trevor.nobile@wisconsin.gov
trevora.bannister@wisconsin.gov
tyler.dix@wisconsin.gov

From: Reif, Maizie L - DNR
Sent: Monday, June 15, 2020 5:00 PM
To: 'kbyrum@mwpaper.com'
Cc: Reif, Maizie L - DNR
Subject: Wisconsin DNR Spill Responsible Party Notification for SERTS ID 20200615NE45-1

Katie,

Please let me know when you find out more information about this spill. You can give me updates via email or phone call whatever is easiest for you

In regard to our conversation earlier, the overall documentation report required should be submitted to me within 45 days of the incident. The report should include information (i.e., what the substance is, what happened, where it happened, how it was fixed, what remedial activities were performed, photo documentation, disposal documentation, etc.) to document spill response activities that occurred.

Please make sure that the report includes **global positioning system (GPS) coordinates** or a **map** that presents an accurate location of the spill. If you need more information related to the spill cleanup documentation report, please do not hesitate to contact me.

The report should be sent to:

Email: maizie.reif@wisconsin.gov (No hard copy of the report is required)

Thank you for your cooperation with this matter!

RR-5538 Wisconsin DNR Spill Electronic Reporting and Tracking System (SERTS) Responsible Party Notification

This notification contains information for the Responsible Party of the spill referenced below. Included is important legal information and links to spill response resources.

This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.

June 15, 2020

Spill Occurred: 2020-06-14 17:00
Spill Reported: 2020-06-15 16:30
Substance(s): Wastewater
SERTS ID: 20200615NE45-1

Spill Location:

540 Prospect St
Unknown City, WI
Outagamie County

Responsible Party:
Midwest Paper Group
Katie Byrum
540 Prospect Ave
Combined Locks, WI 54113

Notice to Responsible Party

The person identified as the "Responsible Party" pursuant to Wis. Admin. Code § NR 700.03(51) is obligated to take the necessary response actions to address the hazardous substance discharge or environmental pollution under Wis. Stat. ch. 292.

Obligations

Your legal responsibilities are defined in Wis. Stat. ch. 292 and Wis. Admin. Code chs. NR 700-754. In particular, the hazardous substances spill law states:

> RESPONSIBILITY. A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.

Wis. Admin. Code chs. NR 700 - 754 establish requirements for actions to be taken by responsible parties to restore the environmental to the extent practicable; protect public health, safety, welfare and the environment; and establishes documentation requirements associated with these response actions, where a hazardous substance discharge or environmental pollution has occurred. Wis. Admin.Code ch. NR 708 contains requirements for immediate actions following a hazardous substance discharge.

Steps to Take

Wis. Admin. Code § NR 708.05 requires responsible parties to take immediate action to halt a hazardous substance discharge or environmental pollution and minimize the harmful effects of the discharge or environmental pollution to the air, lands and waters of the state, unless otherwise directed by the DNR.

Below are initial actions that should be taken to address a hazardous substance discharge or environmental pollution:

> Obtain the services of an environmental response contractor and/or an environmental consultant to help ensure that proper immediate actions are taken and documented. Information about selecting Environmental Consultants and Spill Response Contractors is available at dnr.wi.gov search for environmental consultants and spills.
>
> Review, along with your contractor or consultant, Wis. Admin. Code § 708.05, which describes

spill response actions for both emergency and non-emergency immediate actions.

Wis. Admin. Code § NR 708.05(6) requires the submittal of written documentation to the DNR of immediate actions taken and the outcome of those actions, within 45 days after the hazardous substance discharge notification to the DNR.

Comply with Wis. Admin. Code § NR 708.09, which specifies the requirements for the preparation and submittal of a final report to the DNR documenting the actions taken to respond to the hazardous substance discharge and environmental pollution. Reports may be submitted to the appropriate DNR regional spill coordinator, listed below

Review the remainder of Wis. Admin. Code § NR 708 to ensure that all immediate response action requirements have been complied with.

DNR Determination

The DNR will provide a cursory review of the Wis. Admin. Code ch. NR 708 reports, if submitted without a review fee. If no further action is necessary, the DNR will note that in the Bureau for Remediation and Redevelopment (BRRTS) database. If you want a written response from the DNR related to a No Further Action decision, or any other determination, please fill out and submit DNR Form 4400-237 with the appropriate fee.

If, however, groundwater wells are affected by the hazardous substance discharge or environmental pollution, if free product removal is required, if there is evidence that contaminated soil may be in contact with groundwater or residual contamination poses a threat to public health or the environment, the DNR shall require additional action per Wis. Admin. Code § NR708.09(2).

Please contact me if you have any questions regarding this notification or you would like to discuss your specific situation in more detail.

DNR Regional Spill Coordinator:

Maizie Reif
920-360-4291
Maizie.Reif@wisconsin.gov