Borski, Jennifer - DNR

From: Borski, Jennifer - DNR
Sent: Wednesday, August 18, 2021 1:39 PM
To: 'Caine, Lynelle'; McKnight, Kevin - DNR
Cc: 'Weber, Evan'; 'Chris A. Haese (chaese@ci.neenah.wi.us)'
Subject: RE: P H Glatfelter - Chlorinated, Neenah, WI - Contained out Decision; BRRTS 02-71-550733
Attachments: A.2.a. Soil Analytical Results Table(s) Revised.pdf; A.2.b. Soil Analytical Results Table(s).pdf; B.2.a. Soil Contamination.pdf; B.2.b. Residual Soil Contam.pdf; attachment A - WDNR Contained Out Decision.pdf; Attachment B tclp results and COC.pdf; Figure 3 Residual Soil GW Contami.pdf

Lynelle,

In Kevin's absence, I reviewed the information you submitted (attached) with part of the NER peer-review group this afternoon. We are in agreement that the July 30, 2009 Hazardous Waste Determination for PCE-Impacted Soil (contained out decision) applies to the soil data collected in August to November 2009 (PCE 1 – PCE 28 & UST 1 – UST 2) for the following reasons:

- The Nov 2009 data is from soil confirmation samples collected from the same area;
- Collected from the same historical release as reviewed for the contained out decision; and
- Data is within the range of PCE discovered during the investigation (0.275 to 6.4 milligrams per kilogram (mg/kg) or parts per million (ppm)).

We do want to clarify that this determination also applies to the TCE discovered in the August – November 2009 soil samples that ranged up to 0.158 mg/kg or ppm of TCE.

This email serves as your written clarification and notice to proceed with disposing of the soil at a licensed landfill, subject to landfill acceptance. Please be sure to include documentation of the excavation and disposal in your final documentation for the post closure modification per the July 2, 2021 Notice to Proceed.

Let me know if you need anything further to proceed with your field work next week.

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

Jennifer Borski
Vapor Intrusion Team Leader / Hydrogeologist
Remediation & Redevelopment Program / Environmental Management Division
Wisconsin Department of Natural Resources
625 E. County Road Y, STE. 700, Oshkosh, WI 54901-9731 – *Currently teleworking*
Cell Phone: (920) 360-0853
jennifer.borski@wisconsin.gov

dnr.wi.gov

From: Borski, Jennifer - DNR
Sent: Wednesday, August 18, 2021 10:18 AM

To: Caine, Lynelle <Lynelle.Caine@stantec.com>; McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov>
Cc: Weber, Evan <Evan.Weber@stantec.com>; Chris A. Haese (chaese@ci.neenah.wi.us) <chaese@ci.neenah.wi.us>
Subject: RE: P H Glatfelter - Chlorinated, Neenah, WI - Contained out Decision; BRRTS 02-71-550733

Thank you. I have a call with Roxanne Chronert & Tauren Beggs this afternoon to see what we can do for you to keep your schedule in Kevin's absence. I will follow-up after our call.

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Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Jennifer Borski
Cell Phone: (920) 360-0853
jennifer.borski@wisconsin.gov

From: Caine, Lynelle <Lynelle.Caine@stantec.com>
Sent: Tuesday, August 17, 2021 5:43 PM
To: Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>; McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov>
Cc: Weber, Evan <Evan.Weber@stantec.com>; Chris A. Haese (chaese@ci.neenah.wi.us) <chaese@ci.neenah.wi.us>
Subject: RE: P H Glatfelter - Chlorinated, Neenah, WI - Contained out Decision; BRRTS 02-71-550733

Hi Jennifer,

Here are the tables you requested. It looks like the samples collected during the excavation were very similar to sample results from the site investigation. Feel free to call with any questions or if you need further information. Thanks,

Lynelle Caine
Senior Project Manager
Mobile: 920-655-7211
Lynelle.Caine@stantec.com

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From: Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>
Sent: Tuesday, August 17, 2021 3:05 PM
To: Caine, Lynelle <Lynelle.Caine@stantec.com>; McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov>
Cc: Weber, Evan <Evan.Weber@stantec.com>; Chris A. Haese (chaese@ci.neenah.wi.us) <chaese@ci.neenah.wi.us>
Subject: RE: P H Glatfelter - Chlorinated, Neenah, WI - Contained out Decision; BRRTS 02-71-550733

Lynelle – Can you send me a separate pdf of the historical CVOC soil data table from this case? I need to see the range of data from borings sampled subsequent to 2009.

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Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Jennifer Borski
Cell Phone: (920) 360-0853
jennifer.borski@wisconsin.gov

From: Caine, Lynelle <Lynelle.Caine@stantec.com>
Sent: Tuesday, August 17, 2021 12:10 PM
To: McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov>; Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>
Cc: Weber, Evan <Evan.Weber@stantec.com>; Chris A. Haese (chaese@ci.neenah.wi.us) <chaese@ci.neenah.wi.us>
Subject: P H Glatfelter - Chlorinated, Neenah, WI - Contained out Decision; BRRTS 02-71-550733

HI Kevin/Jennifer,

The work associated with the post-closure modification request for the Ph Glatfelter Mill Site – Tadych redevelopment is slated to begin next week. This redevelopment includes part of the former chlorinated release at the P.H. Glatfelter Mill site and will include further excavation of PCE impacted soil near the north property line (or extending south from the original PCE excavation). Back in July 2009 the WDNR issued a contained out decision for the PCE impacted soil. We are looking to haul the PCE-impacted material to a landfill and they are looking for further clarification to make sure the additional material to be landfilled will fall under the original contained out decision. There questions arise since the original contained out decisions specifically referenced certain borings and not the chlorinated site as a whole. Is this something that could be done fairly quickly not to delay the work. I copied Jennifer on this request since she was involved in the original contained out request and it appears Kevin is on vacation. Please feel free to call with any questions. Thanks,

Lynelle Caine
Senior Project Manager
Mobile: 920-655-7211
Lynelle.Caine@stantec.com

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From: Floyd Leo <floyd.leo@gflenv.com>
Sent: Tuesday, August 17, 2021 9:50 AM
To: Caine, Lynelle <Lynelle.Caine@stantec.com>
Cc: Weber, Evan <Evan.Weber@stantec.com>
Subject: RE: FW: Neenah Contained out Decision

Good Morning, Lynelle and Evan.

Thank you for the information. Could you please have the WDNR provide concurrence that the additional sample detail falls under the original determination? Once we receive this, we can proceed.

Thank you.

Floyd Leo | Account Manager
GFL Environmental
115 Birch Road, Sheboygan Falls, WI, 53085
| **C** (920) 377-0840 | floyd.leo@gflenv.com | www.gflenv.com

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Caine, Lynelle <Lynelle.Caine@stantec.com>
Sent: Monday, August 16, 2021 4:32 PM
To: Floyd Leo <floyd.leo@gflenv.com>
Cc: Weber, Evan <Evan.Weber@stantec.com>
Subject: RE: FW: Neenah Contained out Decision

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Hi Floyd,

The sample results referenced in the Contained Out letter are all part of the same WDNR Site - the PH Glatfelter – Chlorinated release (BRRTS #02-71-550733) which is listed in the RE line of the letter. The sample information that Jeff provided is additional sampling data that was collected during the previous dig and not the initial sampling data. The additional soil excavation work that we are doing is part of this same release as part and being done as part of a post closure modification for this closed BRRTS case. I provided those documents on the following ftp site which should help clear up the matter. Sorry for the confusion. Let me know if you have anymore questions. Thanks,

Login Information

Browser link: https://tmpsftp.stantec.com
FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within an FTP client to view and transfer files and folders; e.g., FileZilla)
Login name: s0830135244
Password: 3175534
Disk Quota: 2GB
Expiry Date: 8/30/2021

Lynelle Caine
Senior Project Manager
Mobile: 920-655-7211
Lynelle.Caine@stantec.com

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From: Floyd Leo <floyd.leo@gflenv.com>
Sent: Monday, August 16, 2021 1:59 PM
To: Weber, Evan <Evan.Weber@stantec.com>; Caine, Lynelle <Lynelle.Caine@stantec.com>
Subject: FW: FW: Neenah Contained out Decision

Hello, Evan and Lynelle.

The sample numbers on the Profile are different than the sample numbers on the contained out letter. If you can clarify or quickly get us a contained out letter on the entire site, we can proceed.

Thoughts?

Floyd Leo | Account Manager
GFL Environmental
115 Birch Road, Sheboygan Falls, WI, 53085
| **C** (920) 377-0840 | floyd.leo@gflenv.com | www.gflenv.com

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the sender and erase this email message immediately.

Kari Rabideau <kari.rabideau@gflenv.com>
Sent: Monday, August 16, 2021 11:06 AM
To: 'Bechard, Tim' <tim.bechard@veolia.com>; Floyd Leo <floyd.leo@gflenv.com>; Elizabeth Gossen <elizabeth.gossen@gflenv.com>; Nathan Schneider <nathan.schneider@gflenv.com>
Cc: Timothy Curry <tim.curry@gflenv.com>
Subject: RE: FW: Neenah Contained out Decision

Are the sample ID numbers detailed in the contained out – the same on the profile? If the contained out determination was issued specific to ID's and not the project we should get clarification from WDNR. We should not presume, particularly in a determination.

Kari Rabideau | Regional Environmental Compliance Manager
GFL Environmental
W3105 Schneider Road, Hilbert, WI, 54129
| **C** (920) 427-9363 | kari.rabideau@gflenv.com | www.gflenv.com

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the sender and erase this email message immediately.

Bechard, Tim <tim.bechard@veolia.com>
Sent: Monday, August 16, 2021 11:01 AM

To: Kari Rabideau <kari.rabideau@gflenv.com>
Subject: Fwd: FW: Neenah Contained out Decision

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Tim Bechard
Approvals Coordinator
Veolia ES Technical Solutions, L.L.C.
1275 Mineral Springs Drive
Port Washington, WI 53074
(262) 243-8903
(262) 268-1962
tim.bechard@veolia.com

---------- Forwarded message ---------
From: **Bechard, Tim** <tim.bechard@veolia.com>
Date: Mon, 16 Aug 2021 at 11:00
Subject: Re: FW: Neenah Contained out Decision
To: Floyd Leo <floyd.leo@gflenv.com>, Kari Rabideau <kari.rabideau@advanceddisposal.com>
Cc: Nathan Schneider <nathan.schneider@gflenv.com>, Elizabeth Gossen <elizabeth.gossen@gflenv.com>

The attached letter references specific sample ID numbers. Kari do you think we need a new letter.

Tim Bechard
Approvals Coordinator
Veolia ES Technical Solutions, L.L.C.
1275 Mineral Springs Drive
Port Washington, WI 53074
(262) 243-8903
(262) 268-1962
tim.bechard@veolia.com

On Mon, 16 Aug 2021 at 09:57, Floyd Leo <floyd.leo@gflenv.com> wrote:

> Hello, Tim.
>
> Attached is the contained out letter that you asked for in conjunction with the Neenah soil property.

Customer wants to haul into Hickory starting next week so if you could speed this along, we would appreciate your help.

Take care.

Floyd Leo | Account Manager
GFL Environmental
115 Birch Road, Sheboygan Falls, WI, 53085
| **C** (920) 377-0840 | floyd.leo@gflenv.com | www.gflenv.com

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Brand, Jeff <Jeff.Brand@stantec.com>
Sent: Monday, August 16, 2021 8:57 AM
To: Floyd Leo <floyd.leo@gflenv.com>
Subject: Neenah Contained out Decision

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Floyd,

Attached please find the contained out letter from the WDNR on the development site in Neenah. Please let me know if we can still get everything set before Monday next week. Thanks!

Jeff Brand

Environmental Scientist

Direct: 920 278-3208
Mobile: 920 883-8501
Fax: 920 592-8444
Jeff.Brand@stantec.com

Stantec
1165 Scheuring Road
De Pere WI 54115-1001

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State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
Ronald W. Kazmierczak, Regional Director

Oshkosh Service Center
625 East County Road Y, STE 700
Oshkosh, Wisconsin 54901-9731
TELEPHONE 920-424-3050
FAX 920-424-4404

July 30, 2009

Robert Buckingham
Community Development Authority of Neenah
PO Box 426
Neenah WI 54957-0426

SUBJECT: Hazardous Waste Determination for PCE-Impacted Soil at,
WDNR Site Name: P H Glatfelter (former) – Chlorinated, Neenah, WI
WDNR BRRTS #: 02-71-550733 (WDNR VPLE #: 06-71-551109)

Dear Mr. Buckingham:

On July 14, 2009, the Department received an electronic request from Bonestroo on behalf of the Community Development Authority (CDA) to evaluate tetrachloroethene (PCE) impacted soils for disposal at a landfill. Based on soil data submitted to the Department as of this date, PCE-impacted soils are present at soil borings, B-3, B-18, B-19 and B-30 and range from 0 275 parts per million (ppm) to 6.4 ppm. The PCE-impacted soil appears to be contamination from a former dry cleaner that operated at the site from 1940 to 1979.

Based on information provided to the Department, the PCE-impacted soil can be "contained-out" in accordance with the *Guidance for Hazardous Waste Remediation, RR-705, May, 2006.* This PCE-impacted soil may be disposed as solid waste; however, disposal is subject to landfill acceptance.

One soil sample, B-30, has lead present at 110 ppm. This is above 20 times the maximum concentration for the toxicity characteristic of 5.0 ppm as listed in Table 2 of ch. NR 661.24, Wis. Adm. Code. As a result, soil at B-30 from 0 to 2 feet should be analyzed by the toxicity characteristic leaching procedure (TCLP) to determine if the lead-impacted soil at B-30 should be disposed as solid or hazardous waste. Disposal of the lead-impacted soil as a solid waste is also subject to landfill acceptance.

Please call me in Oshkosh at (920) 424-7887 with any questions.

Sincerely,

Jennifer Borski
Hydrogeologist
Bureau for Remediation & Redevelopment

Copy: L. Caine, Bonestroo, lynelle.caine@bonestroo.com

Synergy Environmental Lab, INC.

1990 Prospect Ct., Appleton, WI 54914 *P 920-830-2455 * F 920-733-0631

LYNELLE CAINE
BONESTROO
954 CIRCLE DRIVE
GREEN BAY WI 54304

Report Date *03-Aug-09*

Project Name CDA NEENAH **Invoice #** E19343
Project #

Lab Code 5019343A
Sample ID SAMPLE 1
Sample Matrix soil
Sample Date 7/27/2009

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
Inorganic Metals										
TCLP Lead	< 0.05	mg/l	0.05		1	6010B		8/2/2009	ESC	1
TCLP Mercury	< 0.001	mg/l	0.001		1	7470A		8/1/2009	ESC	1

"J" Flag: Analyte detected between LOD and LOQ LOD Limit of Detection LOQ Limit of Quantitation

Code	*Comment*
1	Laboratory QC within limits.

ESC denotes sub contract lab - Certification #998093910

All solid sample results reported on a dry weight basis unless otherwise indicated. All LOD's and LOQ's are adjusted for dilutions but not dry weight.

Authorized Signature

CHAIN OF CUSTODY RECORD

Synergy Environmental Lab, Inc.

1990 Prospect Ct. • Appleton, WI 54914
920-830-2455 • FAX 920-733-0631

Chain # No 159
Page 1 of 1

Sample Handling Request
X Rush Analysis Date Required ____
(Rushes accepted only with prior authorization)
___ Normal Turn Around

Lab I.D. #	
Account No. :	Quote No.:
Project #: COA NEENAH	
Sampler: (signature)	
Project (Name / Location): COA Neenah / Glatfelter	
Reports To: Lynelle Caine (CRIVITZ)	Invoice To:
Company Bonestroo	Company Bonestroo
Address 1203 Storbeck Drive	Address
City State Zip Waupun WI	City State Zip
Phone 920-324-8000	Phone
FAX	FAX

Lab I.D.	Sample I.D.	Collection Date	Collection Time	Comp	Grab	Filtered Y/N	No. of Containers	Sample Type (Matrix)*	Preservation
5019345A	SAMPLE 1	7/27	PM		✓		2-2oz jars		—

Analysis Requested / Other Analysis

DRO (Mod DRO Sep 95)	GRO (Mod GRO Sep 95)	IRON	LEAD	NITRATE / NITRITE	PAH (EPA 8270)	PVOC (EPA 8021)	PVOC + NAPHTHALENE	SULFATE	VOC DW (EPA 524.2)	VOC (EPA 8260)	8-RCRA METALS	TCLP MERCURY	TCLP LEAD	PID/FID
												✓	✓	

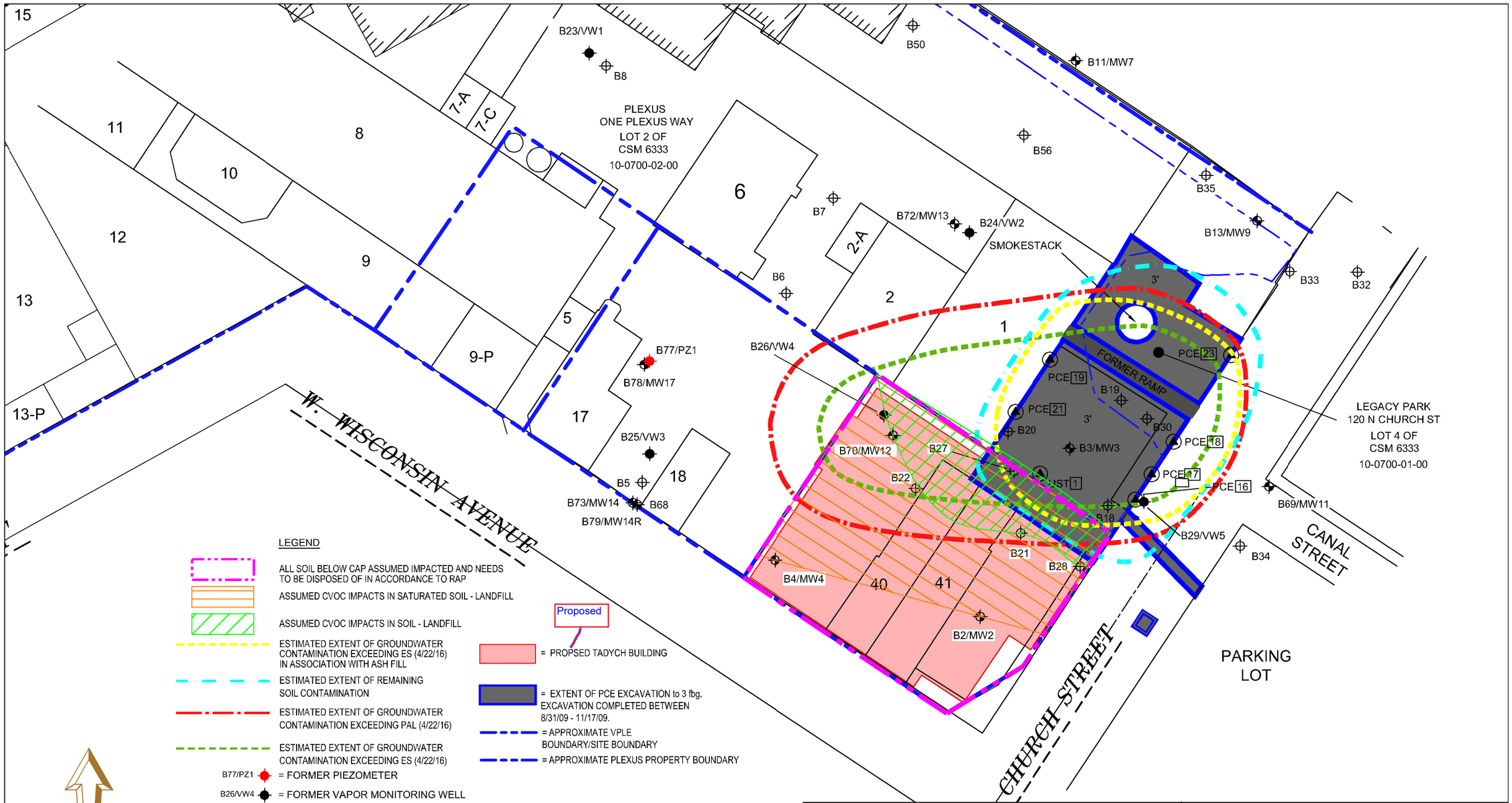
Comments/Special Instructions (*Specify groundwater "GW", Drinking Water "DW", Waste Water "WW", Soil "S", Air "A", Oil, Sludge etc.)

5 DAY TURNAROUND PLEASE

Sample Integrity - To be completed by receiving lab.
Method of Shipment : Client
Temp. of Temp. Blank. ____ °C On Ice: X
Cooler seal intact upon receipt: X Yes ___ No

Relinquished By: (sign)	Time	Date	Received By: (sign)	Time	Date
	1150	7/28/09			

Received in Laboratory By: [signature] Time: 11:50 Date: 7/28/09



LEGEND

- ALL SOIL BELOW CAP ASSUMED IMPACTED AND NEEDS TO BE DISPOSED OF IN ACCORDANCE TO RAP
- ASSUMED CVOC IMPACTS IN SATURATED SOIL - LANDFILL
- ASSUMED CVOC IMPACTS IN SOIL - LANDFILL
- ESTIMATED EXTENT OF GROUNDWATER CONTAMINATION EXCEEDING ES (4/22/16) IN ASSOCIATION WITH ASH FILL
- ESTIMATED EXTENT OF REMAINING SOIL CONTAMINATION
- ESTIMATED EXTENT OF GROUNDWATER CONTAMINATION EXCEEDING PAL (4/22/16)
- ESTIMATED EXTENT OF GROUNDWATER CONTAMINATION EXCEEDING ES (4/22/16)

Proposed

- = PROPOSED TADYCH BUILDING
- = EXTENT OF PCE EXCAVATION to 3 fbg. EXCAVATION COMPLETED BETWEEN 8/31/09 - 11/17/09.
- = APPROXIMATE VPLE BOUNDARY/SITE BOUNDARY
- = APPROXIMATE PLEXUS PROPERTY BOUNDARY

- B77/PZ1 = FORMER PIEZOMETER
- B26/VW4 = FORMER VAPOR MONITORING WELL
- B4/MW4 = FORMER MONITORING WELL LOCATION AND IDENTIFICATION
- B7 = BOREHOLE LOCATION AND IDENTIFICATION
- 2 = FORMER PH GLATFELTER BUILDING NUMBER
- = CONCRETE RAMP

- PCE 1 = PCE SOIL SAMPLE LOCATION COLLECTED FOR FIELD SCREENING AND LAB ANALYSIS (ONLY BOXED IN NUMBERS HAVE BEEN SUBMITTED FOR LAB ANALYSIS)
- UST 1 = UNDERGROUND STORAGE TANK SOIL SAMPLE LOCATION COLLECTED FOR FIELD SCREENING AND LAB ANALYSIS (ONLY BOXED IN NUMBERS HAVE BEEN SUBMITTED FOR LAB ANALYSIS)

N

SCALE IN FEET
25 0 25 50

NOTE: FORMER RAMP AREA NOT EXCAVATED DUE TO BEING BELOW BOTTOM OF EXCAVATION

Stantec
1165 Scheuring Road, De Pere, Wisconsin 54115
Phone: 920-592-8400 Fax: 920-592-8444

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RESIDUAL SOIL AND GROUNDWATER CONTAMINATION (BRRTS# 02-71-550733)

TADYCH REDEVELOPMENT
COMMUNITY DEVELOPMENT AUTHORITY OF THE CITY OF NEENAH
NEENAH, WISCONSIN

DATE: 12/11/20	DRAWN BY: JRB	PROJECT MANAGER: LPC	PROJECT NUMBER: 193708115	FIGURE 3

A.2.a. Soil Analytical Results Table(s), Glatfelter Mill Redevelopment Project, Neenah, Wisconsin

Boring Number	Sample Number	Pre Development Depth (fbg)	Post Development Depth (fbg)	Soil Description	Estimated Depth to Groundwater (fbg)	Sample Condition	Date Collected	Detected DRO (milligram/kilogram)	Detected Volatile Organic Compound Laboratory Results (microgram/kilogram)																					
									Benzene	tert-Butylbenzene	sec-Butylbenzene	n-Butylbenzene	Chloromethane	1,1-Dichloroethane	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Ethylbenzene	Isopropylbenzene	p-Isopropyltoluene	Naphthalene	n-Propylbenzene	Tetrachloroethene (PCE)	Trichlorofluoromethane	Toluene	1,1,1-Trichloroethane (1,1,1-TCA)	Trichloroethene (TCE)	1,2,4 Trimethylbenzene	1,3,5 Trimethylbenzene	Vinyl Chloride	Total Xylenes
Suggested RCL for Protection from Direct Contact (non-industrial)								NE	1,600	183,000	145,000	108,000	159,000	5,060	156,000	1,560,000	8,020	NE	162,000	5,520	NE	33,000	1,230,000	818,000	640,000	1,300	219,000	182,000	67	260,000
Suggested RCL for Protection from Direct Contact (industrial)								NE	7,070	183,000	145,000	108,000	669,000	22,200	2,340,000	1,850,000	35,400	NE	162,000	24,100	NE	145,000	1,230,000	818,000	640,000	8,410	219,000	182,000	2,080	260,000
Suggested RCL for Protection of Groundwater (non-industrial)								NE	5.1	NE	NE	NE	15.5	483.4	41.2	62.6	1,570	NE	NE	658.2	NE	4.5	NE	1,107.2	140.2	3.6	1,382.1 total		0.1	3,960
B-2/MW2	S-5	10-12	9.7-11.7	Clay	12-13	Unsaturated	10/11/07	<10	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<75
B-3/MW3	S-2	2.5-4.5	3.0-4.5 (top 3' removed)	Clay	11	Unsaturated	10/11/07	<10	**42 J**	<25	<25	<25	<25	<25	<25	<25	<25	34 J	<25	<25	227	<25	**6,400**	<25	195	<25	<25	163	48 J	<25	443
	S-5	10-12	9.9-11.9	Clay		Saturated	10/11/07	1,300	<25	490	2,100	1,030	<25	<25	<25	<25	<25	63	<25	205	<25	**51J**	<25	<25	<25	<25	<25	<25	<25	<25	<75
B-4/MW4	S-4	7.5-9.5	7.1-9.1	Clay	10-11	Unsaturated	10/12/07	<10	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<75
B-5	S-2	2.5-4.5	2.5-4.4 (top 2.5' removed)	Clay	10	Unsaturated	10/12/07	14.4	<25	<25	<25	<25	<25	<25	<25	<25	25.5 J	<25	<25	26.8 J	<25	<25	<25	<25	<25	<25	<25	<25	<25	155 J
	S-5	10-12	9.9-11.9	Clay		Saturated	10/12/07	<10	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<75
B-6	S-3	5-7	2.5-4.3 (portion of top removed)	Clay	8-10	Unsaturated	10/12/07	<10	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<75
B-7	S-3	5-7	4.3-6.3	Gravel fill	8-10	Unsaturated	10/12/07	13.0	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<75
B-13/MW9	S-1*	0-4	2.5-4.9 (portion of top removed)	Ash fill	8	Unsaturated	10/30/07	<10	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	160	<25	<25	<25	77	<25	<25	27.6 J	<25	<25	120.4 J
	S-3	8-12	8.9-12.9	Clay		Saturated	10/30/07	<10	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<75
B-18	S-1**	0-4	removed	Ash fill	11	Unsaturated	10/30/07	<10	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	78	<25	**570**	<25	27.8 J	<25	<25	27.8 J	<25	<25	37 J
	S-3	8-12	8.7-12.7	Clay		Saturated	10/30/07	<10	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	78	<25	**33 J**	<25	25.5 J	<25	<25	<25	<25	<25	<75
B-19	S-1	0-4	3.0-4.9 (top 3' removed)	Gravel fill	11	Unsaturated	10/30/07	32.3	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	**275**	<25	<25	<25	<25	<25	<25	<25	<75
	S-3	8-12	8.9-12.9	Clay		Saturated	10/30/07	<10	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<75
B-20	S-3	8-12	8.1-12.1	Clay	10-11	Saturated	10/30/07	875	<25	370	4,900	7,500	<25	<25	**2,120**	33 J	228	1,860	4,100	520	5,700	<25	<25	29.9 J	<25	<25	**36,000**	**10,800**	<25	573
B-21	S-1**	0-4	2.5-4.5 (top 2.5' removed)	Ash fill	11	Unsaturated	10/30/07	<10	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<75
	S-3	8-12	8.5-12.5	Clay		Saturated	10/30/07	<10	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<75
B-22	S-3	8-12	8.6-12.6	Clay	10-11	Saturated	10/30/07	<10	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<75
B24	S2403*	4-6	5.1-7.1	Ash fill	8-10	Unsaturated	07/18/08	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	S2404*	6-8	7.1-9.1	Ash fill		Unsaturated	07/18/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	<48

A.2.a. Soil Analytical Results Table(s), Glatfelter Mill Redevelopment Project, Neenah, Wisconsin

Boring Number	Sample Number	Pre Development Depth (fbg)	Post Development Depth (fbg)	Soil Description	Estimated Depth to Groundwater (fbg)	Sample Condition	Date Collected	Detected DRO (milligram/kilogram)	Detected Volatile Organic Compound Laboratory Results (microgram/kilogram)																					
									Benzene	tert-Butylbenzene	sec-Butylbenzene	n-Butylbenzene	Chloromethane	1,1-Dichloroethane	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Ethylbenzene	Isopropylbenzene	p-Isopropyltoluene	Naphthalene	n-Propylbenzene	Tetrachloroethene (PCE)	Trichloroflouromethane	Toluene	1,1,1-Trichloroethane (1,1,1-TCA)	Trichloroethene (TCE)	1,2,4 Trimethylbenzene	1,3,5 Trimethylbenzene	Vinyl Chloride	Total Xylenes
Suggested RCL for Protection from Direct Contact (non-industrial)								NE	1,600	183,000	145,000	108,000	159,000	5,060	156,000	1,560,000	8,020	NE	162,000	5,520	NE	33,000	1,230,000	818,000	640,000	1,300	219,000	182,000	67	260,000
Suggested RCL for Protection from Direct Contact (industrial)								NE	7,070	183,000	145,000	108,000	669,000	22,200	2,340,000	1,850,000	35,400	NE	162,000	24,100	NE	145,000	1,230,000	818,000	640,000	8,410	219,000	182,000	2,080	260,000
Suggested RCL for Protection of Groundwater (non-industrial)								NE	5.1	NE	NE	NE	15.5	483.4	41.2	62.6	1,570	NE	NE	658.2	NE	4.5	NE	1,107.2	140.2	3.6	1,382.1 total		0.1	3,960
B25	S2502	2-4	2.5-3.9 (top 2.5' removed)	Clay	10	Unsaturated	07/18/08	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	S2503	4-6	3.9-5.9	Clay		Unsaturated	07/18/08	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	S2504	6-7	5.9-6.9	Clay		Unsaturated	07/18/08	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
B26	S2601*	0-2	removed	Ash fill	10	Unsaturated	07/21/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	<48
	S2602	2-4	2.5-4.2 (top 2.5' removed)	Clay		Unsaturated	07/21/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	<48
	S2606	9-10	9.2-10.2	Clay		Unsaturated	07/21/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	<48
B28	S2802*	2-4	removed	Ash fill	11-12	Unsaturated	07/21/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	<48
	S2803	4-6	removed	Clay		Unsaturated	07/21/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	<48
	S2804	6-7	removed	Clay		Unsaturated	07/21/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	<48
	S2806	9-10	9.5-10.5	Clay		Unsaturated	07/21/08	<10	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	<48
B29	S2901*	0-2	removed	Ash fill	11	Unsaturated	07/21/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	198 J	<29	**56 J**	<16	33 J	<27	<20	64	<24	<17	120 J
	S2904	6-7	6.7-7.7	Clay		Unsaturated	07/21/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	<48
	S2905	7-9	7.7-9.7	Clay		Unsaturated	07/21/08	<10	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	<48
B30	S3001*	0-2	removed	Ash fill	11	Unsaturated	07/21/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	**1,180**	<16	30.6 J	<27	<20	68	<24	<17	149 J
	S3003	4-6	4.9-6.9	Ash fill		Unsaturated	07/21/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	**98**	<16	<23	<27	<20	<20	<24	<17	<48
	S3006	10-11	10.9-11.9	Clay		Unsaturated	07/21/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	<48
B31	S3101*	0-2	removed	Ash fill	9	Unsaturated	07/21/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	22.1 J	<24	<17	22.1 J
	S3102*	2-4	3.0-4.9 (top 3' removed)	Ash fill		Unsaturated	07/21/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	15.5 J
	S3104*	6-8	6.9-8.9	Ash fill		Unsaturated	07/21/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	<48
B34	S3401*	0-2	0-2	Ash fill	9	Unsaturated	07/21/08		<20	<23	<25	<35	**45 J**	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	<48
B56	S5601	0-2	12-14	Sand	---	Unsaturated	12/18/08	---	<20	<23	<25	<35	<43	<22	<24	<29	<16	<30	<30	<117	<29	<18	<16	<23	<27	<20	<20	<24	<17	15.6 J
B69/MW11	S6907	12-14	12-14	Clay	---	Saturated	04/23/10	---	<35	<41	<35	<46	<80	<45	<44	<43	<56	<39	<43	<53	<44	<53	<35	<51	<28	<50	<73	<57	<33	<124
B70/MW12	S7006	10-12	10-12	Clay	---	Saturated	04/23/10	---	<35	<41	<35	<46	<80	<45	<44	<43	<56	<39	<43	<53	<44	<53	<35	<51	<28	<50	<73	<57	<33	<124

Notes:

1) All analyzed samples consist of soil unless otherwise noted.
2) RCLs are based on the March 2017 update to the WDNR "RCL spreadsheet" available for download at: http://dnr.wi.gov/topic/Brownfields/professionals.html
3) The groundwater protection RCLs shown for 1,2,4- and 1,3,5-trimethylbenzene apply to the combined concentration of 1,2,4- and 1,3,5-trimethylbenzene.
4) Post Development depth for soil samples collected from borings B18, B19, B20, B21, B26, B28, B29, B30, B31, B35, B37, B57, B58, B59, B60, TP-14A, and TP-16 were exptrapolated from known adjacent elevations
5) Estimated depth to groundwater is reported as observed prior to development

DRO = diesel range organics
VOC = volatile organic compound
NE = not established by Wisconsin Administrative Code (Wis. Adm. Code)
NC = not calculated and/or compound not listed in EPA list of parameters.
NA = not applicable since NR 720.11 Wis. Adm. Code or suggested RCL exists
<x = analyte not detected to a detection limit of x
"J" = analyte detected between limit of detection and limit of quantitation
--- = not analyzed
fbg = feet below grade
* = Waste sample (Waste defined as random layers or mixtures of clay, silt, sand, and/or gravel containing coal and cinder fragments.)
** = Potential waste sample

XXX = concentrations exceeds suggested RCL for direct contact (non-industrial)

XXX = exceeds calculated site-specific RCL for protection of groundwater (non-industrial)

Additional soil analysis collected and provided in conjunction with ash fill closure (BRRTS# 02-71-550735).

A.2.b. Soil Analytical Results Table(s), Glatfelter Mill Redevelopment Project, Neenah, Wisconsin

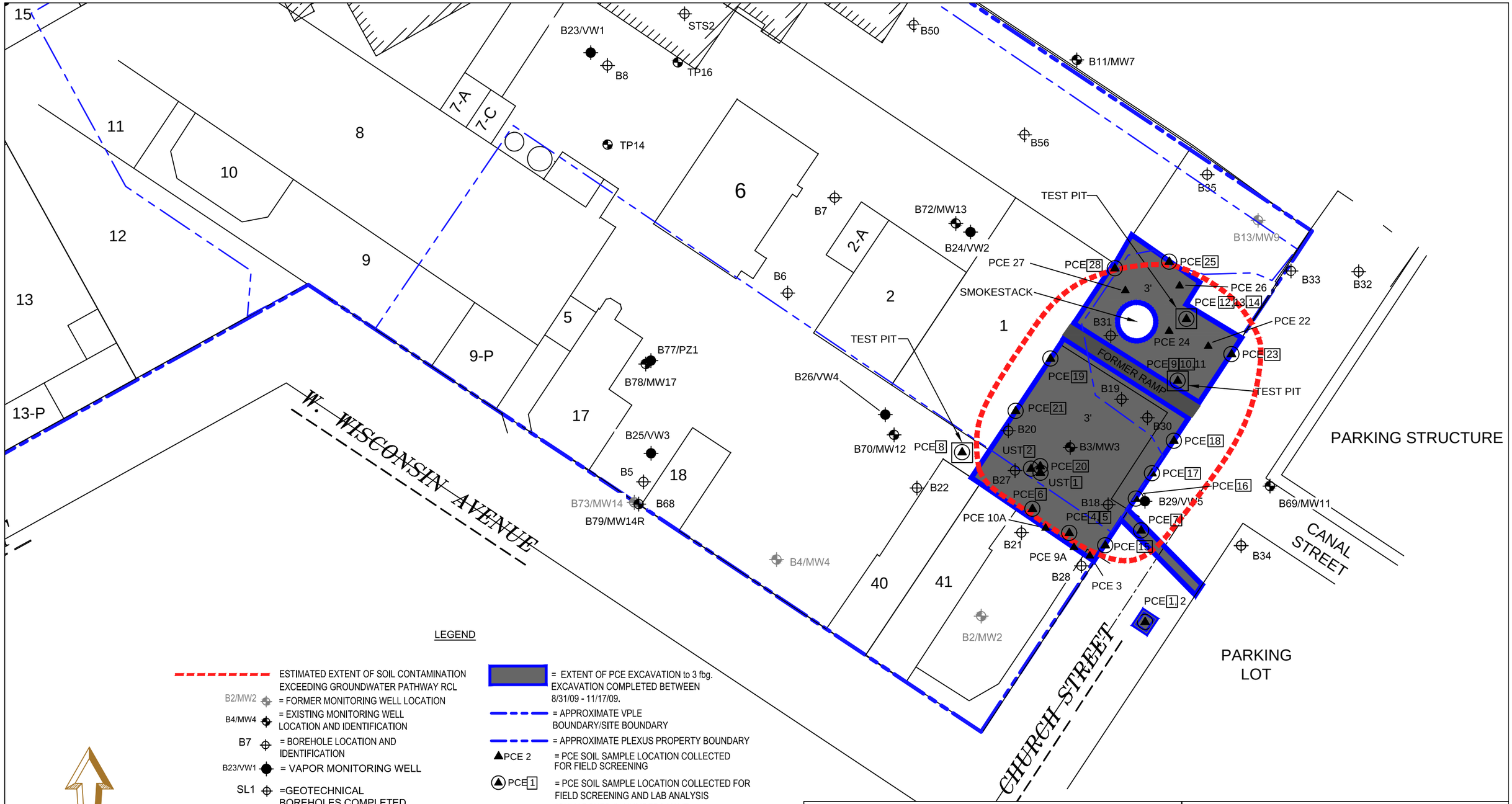
Sample Number	Pre-Development Depth (fbg)	Post-Development Depth (fbg)	Sample Location	PID	Sample Condition	Date Collected	Detected Volatile Organic Compound Laboratory Results (microgram/kilogram)													
							n-Butylbenzene	1,1-Dichloroethane	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Ethylbenzene	Naphthalene	n-Propylbenzene	Tetrachloroethene (PCE)	Toluene	1,1,1-Trichloroethane (1,1,1-TCA)	Trichloroethene (TCE)	1,2,4 Trimethylbenzene	1,3,5 Trimethylbenzene	Vinyl Chloride	Total Xylenes
Suggested RCL for Protection from Direct Contact (non-industrial)							108,000	5,060	156,000	1,560,000	8,020	5,520	NE	33,000	818,000	640,000	1,300	219,000	182,000	67	260,000
Suggested RCL for Protection from Direct Contact (industrial)							108,000	22,200	2,340,000	1,850,000	35,400	24,100	NE	145,000	818,000	640,000	8,410	219,000	182,000	2080	260,000
Suggested RCL for Protection of Groundwater							NE	483.4	41.2	62.6	1,570	658.2	NE	4.5	1,107.2	140.2	3.6	1,382.1 total		0.1	3,960
PCE 1	1.5	Removed	Excavated - Utilities	0	Unsaturated	08/31/09	<35	<22	<24	<29	<16	<117	<29	<18	<23	<27	<20	<20	<24	<17	<48
PCE 4	2-4	Removed	Excavated - Utilities	0	Unsaturated	09/01/09	<35	<22	<24	<29	<16	<117	<29	**26.6 J**	<23	<27	<20	<20	<24	<17	<48
PCE 5	6-8	Removed	Floor - Utilities	0	Unsaturated	09/01/09	<35	<22	<24	<29	<16	<117	<29	<18	<23	<27	<20	<20	<24	<17	<48
PCE 6	0-2	Removed	Excavated	0	Unsaturated	09/01/09	<35	<22	<24	<29	<16	<117	<29	**360**	<23	<27	<20	<20	<24	<17	<48
PCE 7	2-4	Removed	Excavated - Utilities	0	Unsaturated	09/01/09	<35	<22	<24	<29	<16	<117	<29	**42 J**	<23	<27	<20	<20	<24	<17	<48
PCE 8	2	Removed	Test Pit	531	Unsaturated	09/02/09	<35	<22	<24	<29	<16	<117	<29	<18	<23	<27	<20	<20	<24	<17	<48
PCE 9	0-2	Removed	Excavated - Test Pit	540	Unsaturated	09/15/09	<35	<22	<24	<29	<16	<117	<29	<18	50 J	<27	<20	43 J	<24	<17	123 J
PCE 10	2-4	Removed	Floor - Test Pit	770	Unsaturated	09/15/09	<35	<22	<24	<29	<16	<117	<29	<18	<23	<27	<20	<20	<24	<17	<48
PCE 12	0-2	Removed	Excavated - Test Pit	540	Unsaturated	09/15/09	<35	<22	<24	<29	<16	<117	<29	<18	<23	<27	**23.9 J**	<20	<24	<17	<48
PCE 14	4-6	Removed	Floor - Test Pit	841	Unsaturated	09/15/09	<35	<22	<24	<29	<16	<117	<29	<18	<23	<27	<20	<20	<24	<17	<48
PCE 15	2	Removed	East Sidewall	580	Unsaturated	09/16/09	<35	<22	<24	<29	<16	<117	<29	<18	<23	<27	<20	<20	<24	<17	<48
PCE 16	2	2	East Sidewall	818	Unsaturated	09/16/09	<35	<22	<24	<29	<16	<117	<29	**198**	45 J	<27	<20	45 J	<24	<17	149 J
PCE 17	2	2	East Sidewall	341	Unsaturated	09/16/09	<35	<22	<24	<29	20.5 J	170 J	<29	**45 J**	103	<27	<20	70	<24	<17	257
PCE 18	2	2	East Sidewall	1256	Unsaturated	09/16/09	<35	<22	<24	<29	22.4 J	201 J	<29	**2,970**	102	<27	<20	116	35 J	<17	351
PCE 19	2	2	West Floor/Sidewall	1430	Unsaturated	09/16/09	<35	<22	**68 J**	<29	<16	<117	<29	**5,400**	<23	<27	**55 J**	<20	<24	<17	18.5 J
PCE 20	2	Removed	Excavated	1130	Unsaturated	09/16/09	<35	<22	<24	<29	<16	<117	<29	**28.1 J**	<23	<27	<20	<20	<24	<17	<48
PCE 21	2	2	West Floor/Sidewall	3902	Unsaturated	09/17/09	69 J	<22	<24	<29	27.1 J	500	50 J	**5,100**	78	<27	**158**	340	86	<17	301
PCE 23	1.5	1.5	East Sidewall	10	Unsaturated	11/17/09	<35	<22	<24	<29	<16	<117	<29	<18	<23	<27	**81**	<20	<24	<17	<48
PCE 25	1.5	Removed	North Sidewall	5.6	Unsaturated	11/17/09	<35	<22	<24	<29	<16	<117	<29	<18	<23	<27	<20	<20	<24	<17	<48
PCE 28	1.5	Removed	West Floor/Sidewall	2.5	Unsaturated	11/17/09	<35	<22	<24	<29	<16	<117	<29	<18	<23	<27	<20	<20	<24	<17	<48
UST 1	3	3	Floor	2741	Unsaturated	09/17/09	<35	<22	<24	<29	<16	<117	<29	**70**	<23	<27	<20	<20	<24	<17	<48
UST 2	3	Removed	Floor	0.095	Unsaturated	09/17/09	<35	<22	<24	<29	<16	<117	<29	<18	<23	<27	<20	<20	<24	<17	<48

Notes:
1) All analyzed samples were soil samples unless otherwise noted.
2) RCLs are based on the March 2017 update to the WDNR "RCL spreadsheet" available for download at: http://dnr.wi.gov/topic/Brownfields/professionals.html
3) The groundwater protection RCLs shown for 1,2,4- and 1,3,5-trimethylbenzene apply to the combined concentration of 1,2,4- and 1,3,5-trimethylbenzene.
4) Post Development depth for soil samples collected from borings B18, B19, B20, B21, B26, B28, B29, B30, B31, B35, B37, B57, B58, B59, B60, TP-14A, and TP-16 were exptrapolated from known adjacent elevations
5) All samples collected above the all-time low water table
6) Samples PCE 16,17,18,19,21,23, and UST 1 were collected from soils remianing in place on the Property. All other samples were collected from excavation sidewalls or floor and removed during excavation. For a more detailed depiction of sample locations please refer to B.2.a. Soil Contamination figure.

VOC = volatile organic compound
NE = not established by Wisconsin Administrative Code (Wis. Adm. Code)
NC = not calculated and/or compound not listed in EPA list of parameters.
NA = not applicable since NR 720.11 Wis. Adm. Code or suggested RCL exists
<x = analyte not detected to a detection limit of x
"J" = analyte detected between limit of detection and limit of quantitation
--- = not analyzed
fbg = feet below grade

XXX = concentrations exceed RCLs for protection from direct contact (non-industrial)
XXX = concentrations exceed RCLs for protection from direct contact (industrial)
XXX = concentrations exceed RCLs for protection of groundwater (non-industrial)

Additional soil analysis collected and provided in conjunction with ash fill closure (BRRTS# 02-71-550735).



LEGEND

- ESTIMATED EXTENT OF SOIL CONTAMINATION EXCEEDING GROUNDWATER PATHWAY RCL
- B2/MW2 = FORMER MONITORING WELL LOCATION
- B4/MW4 = EXISTING MONITORING WELL LOCATION AND IDENTIFICATION
- B7 = BOREHOLE LOCATION AND IDENTIFICATION
- B23/VW1 = VAPOR MONITORING WELL
- SL1 =GEOTECHNICAL BOREHOLES COMPLETED FOR STEAM LINE
- STS1 =GEOTECHNICAL BOREHOLES COMPLETED FOR PLEXUS BUILDING
- 2 = FORMER PH GLATFELTER BUILDING NUMBER
- = CONCRETE RAMP
- = EXTENT OF PCE EXCAVATION to 3 fbg. EXCAVATION COMPLETED BETWEEN 8/31/09 - 11/17/09.
- = APPROXIMATE VPLE BOUNDARY/SITE BOUNDARY
- = APPROXIMATE PLEXUS PROPERTY BOUNDARY
- ▲PCE 2 = PCE SOIL SAMPLE LOCATION COLLECTED FOR FIELD SCREENING
- PCE 1 = PCE SOIL SAMPLE LOCATION COLLECTED FOR FIELD SCREENING AND LAB ANALYSIS (ONLY BOXED IN NUMBERS HAVE BEEN SUBMITTED FOR LAB ANALYSIS)
- UST 1 = UNDERGROUND STORAGE TANK SOIL SAMPLE LOCATION COLLECTED FOR FIELD SCREENING AND LAB ANALYSIS (ONLY BOXED IN NUMBERS HAVE BEEN SUBMITTED FOR LAB ANALYSIS)
- TP14 = TEST PIT LOCATION FOR COLLECTION OF COMPOSITE ASH FILL SAMPLE

N

SCALE IN FEET

25 0 25 50

NOTE: FORMER RAMP AREA NOT EXCAVATED DUE TO BEING BELOW BOTTOM OF EXCAVATION

Stantec

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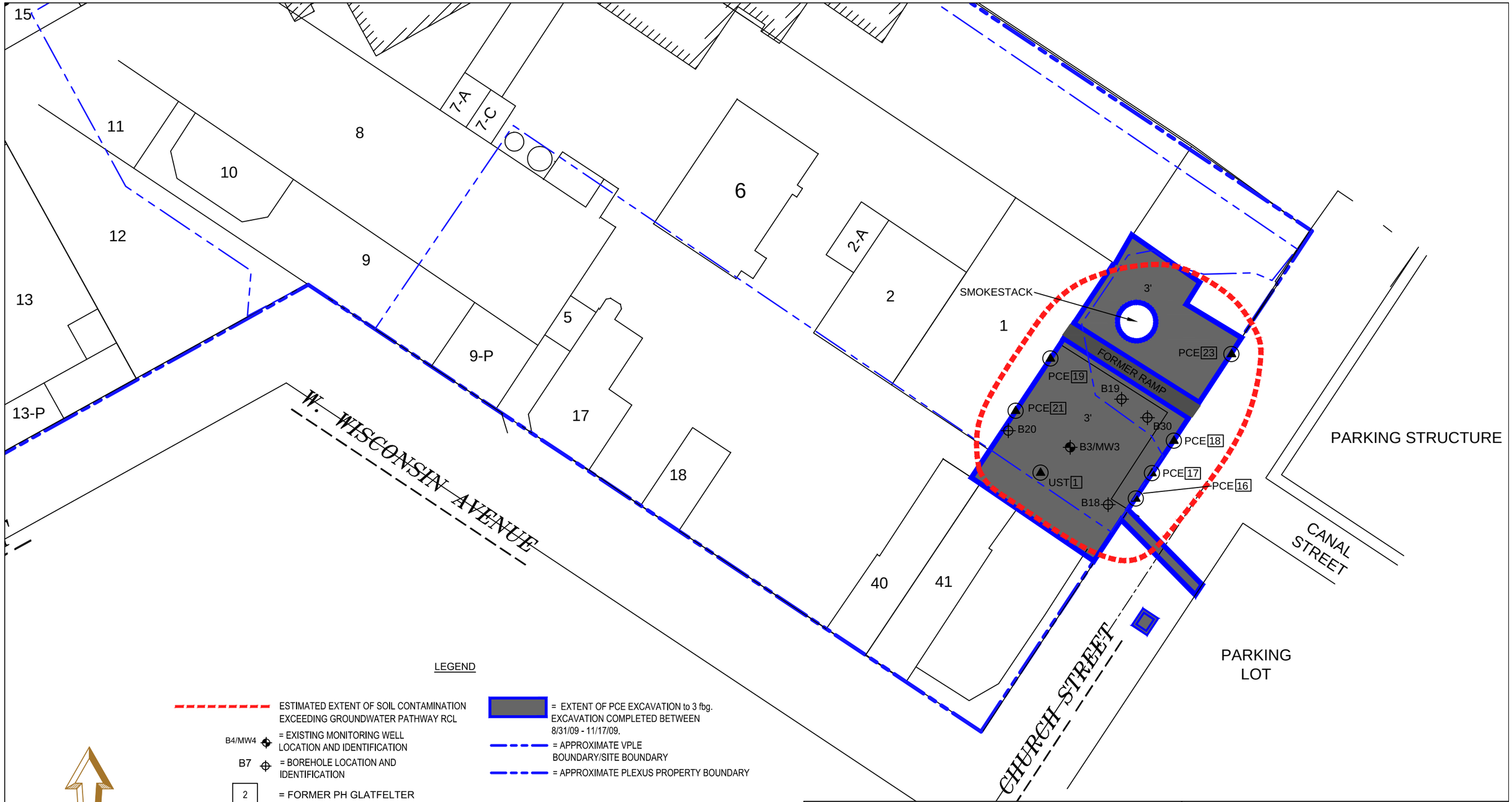
B.2.a. SOIL CONTAMINATION

GLATFELTER MILL REDEVELOPMENT PROJECT
COMMUNITY DEVELOPMENT AUTHORITY OF
THE CITY OF NEENAH
NEENAH, WISCONSIN

DATE: 9/23/16	DRAWN BY: JRB	PROJECT MANAGER: LPC	PROJECT NUMBER: 193703504	FIGURE B.2.a.



LEGEND

- ESTIMATED EXTENT OF SOIL CONTAMINATION EXCEEDING GROUNDWATER PATHWAY RCL
- B4/MW4 = EXISTING MONITORING WELL LOCATION AND IDENTIFICATION
- B7 = BOREHOLE LOCATION AND IDENTIFICATION
- 2 = FORMER PH GLATFELTER BUILDING NUMBER
- = CONCRETE RAMP
- = EXTENT OF PCE EXCAVATION to 3 fbg. EXCAVATION COMPLETED BETWEEN 8/31/09 - 11/17/09.
- = APPROXIMATE VPLE BOUNDARY/SITE BOUNDARY
- = APPROXIMATE PLEXUS PROPERTY BOUNDARY
- PCE 1 = PCE SOIL SAMPLE LOCATION COLLECTED FOR FIELD SCREENING AND LAB ANALYSIS (ONLY BOXED IN NUMBERS HAVE BEEN SUBMITTED FOR LAB ANALYSIS)
- UST 1 = UNDERGROUND STORAGE TANK SOIL SAMPLE LOCATION COLLECTED FOR FIELD SCREENING AND LAB ANALYSIS (ONLY BOXED IN NUMBERS HAVE BEEN SUBMITTED FOR LAB ANALYSIS)

N

SCALE IN FEET

25 0 25 50

NOTE: FORMER RAMP AREA NOT EXCAVATED DUE TO BEING BELOW BOTTOM OF EXCAVATION

B.2.b. RESIDUAL SOIL CONTAMINATION

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DATE: 9/23/16	DRAWN BY: JRB	PROJECT MANAGER: LPC	PROJECT NUMBER: 193703504	FIGURE B.2.b.