04-51-229677

Jim Hasch
FYI — file or toss

Georgia-Pacific Corporation
Environmental Engineering
800 Zeagler Drive, Suite 420
Palatka, Florida 32177-3867
Telephone (904) 329-9104
Fax (904) 329-9646

July 25, 1996

Mr. Lonn Franson
Environmental Engineer
Department of Natural Resources
Rt. 2 Box 2003
Ranger Station Road
Hayword, Wisconsin 54843

Dear Mr. Franson:

In response to your letter of July 3, 1996 please find the information you requested. The schematics representing the collection and oil/water separator systems as they existed on May 21st along with the proposed system are attached. The old system had an automatic sump pump that pumped directly to three oil/water separating tanks based strictly on water level in the press pit. The new system has already replaced the automatic pump with a system that requires the operator to manually start the press pit sump pump and limits run time to 10 minutes. Operators are required to assure that the oil water separating system has sufficient capacity prior to starting the pump. In addition to the new switch and procedures we plan to install a new 2000 gallon separating tank prior to the existing oil/water separators. This tank is being fabricated and should be completed in 4 to 6 weeks. The oil water mixture will be allowed to separate in the new tank, then the oil will be vacuumed off the top and placed into a holding tank prior to being utilized off site. The water from the new separating tank will be pumped through the existing three separating tanks, and a new coalescing plate oil separator, before discharge to the City of Phillips POTW.

This system will allow five opportunities for the oil to separate before discharging to the sewer. Also, the addition of a manual start pump with a maximum 10 minute run time, and visual inspections of the water before transfer to the next stage, will prevent the situation that happened during the release.

For the short term, we are sure the addition of the manual start/auto shutoff press pit pump and implementation of the new procedures will prevent a release. Anyone who turns on the pump must first check the separating tanks to confirm there is enough room for any oil pumped from the pit. This will assure proper operation until the entire system can be installed by the end of September.

Mr. Lonn Franson
July 24, 1996

A list of process water flows that discharge to the City of Phillips sewer system is also attached. With the exception of the Waterbased Paint Clean-up Water, there have not been any analyses of the water streams to my knowledge. The 418 Refiner Stream may have some wood fiber in it at times, but normally would not. The Bearing Oil Cooler and the two Hydraulic Coolers are untreated, non-contact cooling water streams and are not expected to be contaminated. I have also included an analysis of the Waterbased Clean-up stream.

Sincerely,

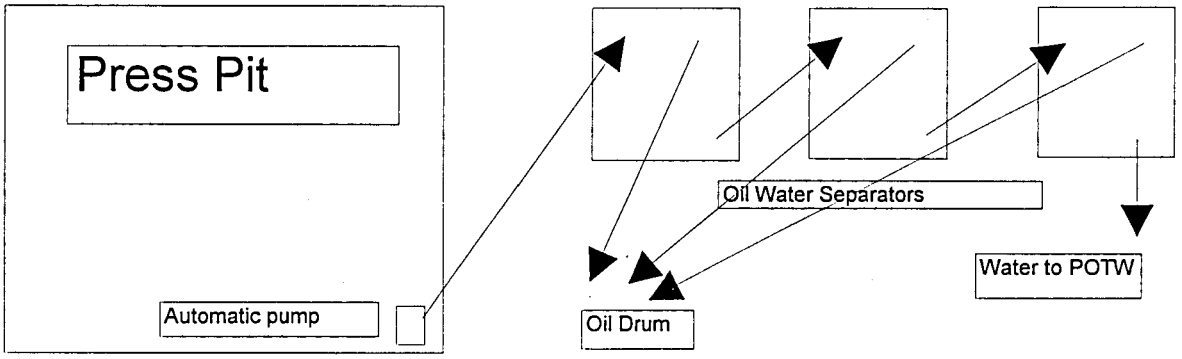
Vernon L. Adams

Vernon L. Adams
Manager, Field
Environmental Engineering

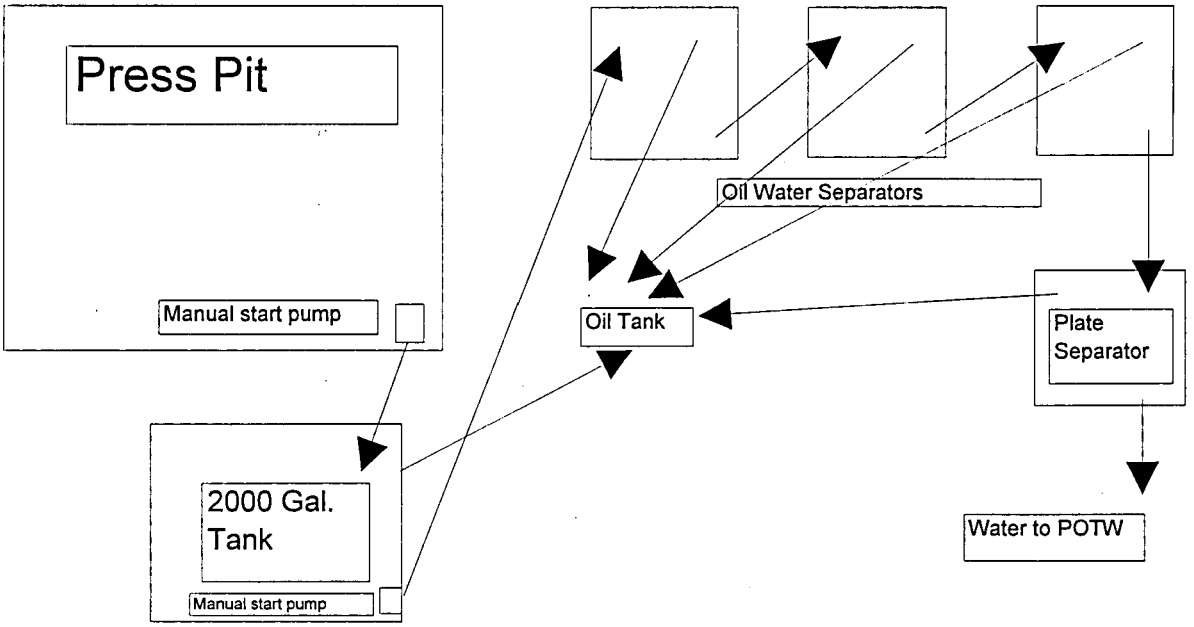
cc: S. Johnson
D. Olson

Oil/Water Separation System

System as of 5/21/96



Proposed System



WATER FLOWS TO CITY SEWER

418 PACKING COOLING WATER

NORTH 1.0 GALLON/40 SECONDS = 1.5 GALLONS/MINUTE
SOUTH 1.0 GALLON/16 SECONDS = 3.75 GALLONS/MINUTE
TOTAL = 5.25 GALLONS/MINUTE

5.25 X 60 X 24 X 30 = **226,800 GALLONS/MONTH**

PLUGFEEDER BEARING OIL COOLER (NON-CONTACT COOLING)

1.0 GALLON/12 SECONDS = 5 GALLONS/MINUTE

5 X 60 X 24 X 30 = **216,000 GALLONS/MONTH**

REFINER HYDRAULIC COOLER (NON-CONTACT COOLING)

1.0 GALLON/24 SECONDS - 2.5 GALLONS/MINUTE

2.5 X 60 X 24 X 30 = **108,000 GALLONS/MONTH**

WIGWAG HYDRAULIC COOLING (NON-CONTACT COOLING)

ESTIMATE 0.5 GALLON/MINUTE

0.5 x 60 x 24 x 30 = **21,600 GALLONS/MONTH**

BOILER BLOWDOWN

2.75 GALLONS/MINUTE

2.75 x 60 x 24 x 30 = **118,800 GALLONS/MONTH**

PRINTLINE BOARD COOLING

4.4 GALLONS/MINUTE

4.4 X 2800 PRODUCTION HOURS/12 MONTHS = **61,600 GALLONS/MONTH**

PRESS PIT

ESTIMATE IS **10,000 GALLONS PER MONTH**

WATERBASED PAINT CLEAN-UP

ESTIMATE **200 GALLONS/MONTH**

TOTAL = **763,000 GALLONS/MONTH**

CETCO
COLLOID ENVIRONMENTAL TECHNOLOGIES COMPANY
1350 West Shure Drive • Arlington Heights, IL 60004-1440 • USA
(708) 392-5800 • Fax (708) 506-6150

Test Report
Wastewater Analysis

SAMPLE IDENTIFICATION: Ink Wastewater DATE: 04/24/95

SUBMITTED BY: Steve Johnson
Georgia Pacific
P.O. Box 138, Highway 13
Phillips, WI 54555

Laboratory tests on samples submitted indicate the following before and after treatment with System AC:

ANALYSIS	Untreated	Treated
Suspended Solids (ppm)	>250	<40
pH	7.29	6.65
Oil and Grease (ppm)	12,600	980
Total Organic Carbon (ppm)	>107,000	8560
Cadmium (ppm)	0.70	0.01
Chromium (ppm)	0.87	<0.005
Copper (ppm)	6.56	0.12
Lead (ppm)	1.95	0.09
Nickel (ppm)	1.77	<0.005
Zinc (ppm)	17.9	0.12

Sample test results occasionally are not representative of in-field results due to non-representative sampling, or chemical changes in sample due to lengthy transit time.

BASED ON SAMPLE SUBMITTED, SYSTEM AC IS RECOMMENDED

TREATMENT:

1) Dilute wastewater 1:4 with tap water.
2) Treat wastewater with 0.20 lbs./gal. RM-10MESP, agitate, then filter.

Estimated dosage rate per 1000 gallons diluted wastewater: 200 lbs.RM-10MESP

Return Samples Req.: Yes

Lab Report No.: 2706-1 Analyst: Eric Vogt

P.O. No.: 7800 CETCO Manager: JA

CETCO
COLLOID ENVIRONMENTAL TECHNOLOGIES COMPANY
1350 West Shure Drive • Arlington Heights, IL 60004-1440 • USA
(708) 392-5800 • Fax (708) 506-6150

Test Report
Wastewater Analysis

SAMPLE IDENTIFICATION: Basecoat Filler Wastewater DATE: 04/24/95

SUBMITTED BY: Steve Johnson
Georgia Pacific
P.O. Box 138, Highway 13
Phillips, WI 54555

Laboratory tests on samples submitted indicate the following before and after treatment with System AC:

ANALYSIS	Untreated	Treated
Suspended Solids (ppm)	>250	<30
pH	8.23	7.21
Oil and Grease (ppm)	2600	1690
Total Organic Carbon (ppm)	30,800	18,000
Cadmium (ppm)	10.1	<0.02
Chromium (ppm)	<0.005	<0.02
Copper (ppm)	0.07	0.04
Lead (ppm)	0.31	0.12
Nickel (ppm)	0.07	<0.02
Zinc (ppm)	0.50	0.12

Sample test results occasionally are not representative of in-field results due to non-representative sampling, or chemical changes in sample due to lengthy transit time.

BASED ON SAMPLE SUBMITTED, SYSTEM AC IS RECOMMENDED

TREATMENT:

1) Treat wastewater with 0.08 lbs./gal. RM-10MESP, agitate, then filter.

Estimated dosage rate per 1000 gallons wastewater: 80 lbs.RM-10MESP

Return Samples Req.: Yes

Lab Report No.: 2706-2 Analyst: Eric Vogt EV

P.O. No.: 7800 CETCO Manager: JA

State of Wisconsin \ Department of Natural Resources

Hayward Ranger Station

Rt. 2 Box 2003
Ranger Station Road
Hayward, Wisconsin 54843
TELEPHONE 715:634-6514
FAX 715:634-6518

July 3, 1996

WI-0003140
File Ref: 3420

Mr. Vernon Adams, Manager, Field Environmental Engineering
Georgia-Pacific Corporation
Suite 420
800 Zeagler Drive
Patlatka, FL 32177

RE: Phillips Wisconsin Plant

Dear Mr. Adams:

This letter is to follow up my visit with you and Steve Johnson on June 19, 1996, at your Phillips Wisconsin facility. The meeting was in response to a hydraulic oil spill at this facility on May 21, 1996, which was released to the city's wastewater treatment plant. The spill caused impairment of treatment plant operations for several days. There are several items which need your further attention.

As a result of this spill, you have concluded that current containment measures are inadequate to prevent another spill of this magnitude. I request that you submit a short report with schematics describing the operations of the system involved in the spill event and what changes you made and intend to make to eliminate the possibility of a similar spill. (This report does not need to be lengthy, a page or two.) Also, please submit a schedule for completion of the proposed improvements.

The City of Phillips has an obligation under it's WPDES permit to prohibit the discharge into the collection system of "solid or viscous substances in amounts which cause obstructions to the flow in sewers or interference with the proper operations of the treatment work." The city has the ultimate authority to determine what goes down the sewer. Please take all precautions to insure such an event does not happen again. Another spill that inhibits treatment operations will likely result in Department enforcement action against the City and/or Georgia-Pacific.

While touring your facility I noticed several sources of wastewater discharge to the city from plant operations. Please submit an additional brief report that identifies and describes all wastewater streams, their daily volumes, and concentrations of known pollutants. Try to get both reports to me by August 1, 1996.

We also discussed that you would like to discharge the separated water from the oil and water mixture that was removed from the treatment works after the spill. This may be an acceptable alternative, however, approval for this option needs to come from the city upon review of acceptable waste characterization results. Analysis for oil and grease, and PAH's will be sufficient for characterization. When you have the results please provide John Martwick a copy to review for acceptability of discharge.

If you have any questions or comments on this letter or items I have requested feel free to call.

Sincerely,

Lonn Franson

Lonn Franson
Environmental Engineer

cc: 1. Bob Gothblad—Spooner
2. WW/2—Madison
3. John Martwick--Phillips
4. Jim Hosch--Spooner
5. Steve Johnson--Georgia Pacific

RECEIVED
JUL 08 1996
DNR - SPOONER

DR

PLEASE PRINT

State of Wisconsin Substance Release Notification Form

04-51-229677cv

24-Hour Emergency Hotline Number: 1-800-943-0003

Form 4400-91 Rev. 11-95

Date and Mil. Time of Incident 5-21-96 Approx. 1:00 Am	**Date and Mil. Time Reported** 5-21-96 Approx. 8:00 Am

Person Reporting John Martwick	**Telephone #** (715) 339-3192
Representing Agency, Firm, or Citizen City of Phillips	
Responsible Party Georgia Pacific - Lionite Products	
Contact Name Steve Johnson	**Telephone #** (715) 339-2111
Address 115 Depot Rd. Same as Hwy 13?	**City, State, Zip Code** Phillips, WI. 54555

Substance Involved Hyd. oil	**Amount & Units Released** approx. 500 Gals.	**Amt. Recovered** ?	**Is this a 304 (11004 42 USC) spill?** ☐ Yes ☐ No ☐ Unknown

☐ Solid ☐ Semisolid ☐ Liquid ☐ Gas **Color** _____ **Odor** _____

RECEIVED JUN 13 1996 DNR - SPOONER

Exact Location (inc. address, facility name, mileage, bldg. #, etc.)
as above

City	**County** Price	**Lat/long**
DNR Region NWD	___¼___¼sec___T37NR1___(E/W)	**Weather Cond.**

Cause of Incident
Leak in Large Press, oil went through a Series of Tanks & Pumped into City

Spilled Substance Impact To:
Check (✓) all that apply
- ☐ Air ☐ Potential
- ☒ Soil ☐ Potential
- ☒ Groundwater ☐ Potential
- ☒ Surface Water ☐ Potential
  Name: Elk Lake & River
- ☐ Storm Sewer ☐ Potential
- ☒ Sanitary Sewer ☐ Potential
- ☐ Concrete/Asphalt ☐ Potential
- ☐ Private Well ☐ Potential
- ☐ Contained/Recovered
- ☐ Other: _____

Spill Source:
- ☐ Transportation Accident, Fuel Supply Tank Spill
- ☐ Transportation Accident, Load Spill
- ☒ Industrial Facility ☐ Paper Mill ☐ Chemical Co.
- ☐ Ag Coop/Facility/Food Factory/Facility
- ☐ Gas/Service Station/Garage/Auto Dealer, Repair Shop
- ☐ Pipeline, Terminal, Tank Farm, Oil Jobber/Wholesaler
- ☐ Public Property (city, state, church, school, etc.)
- ☐ Utility Co., Power Generating/Transfer Facility
- ☐ Private Property (home/farm)
- ☐ Construction, Excavation, Wrecking, Quarry, Mine
- ☐ Airport Facility ☐ Railroad Facility
- ☐ Other _____

Action Taken By Spiller
- ☐ No Action Taken
- ☐ No Action Needed
- ☐ Monitor
- ☒ Cleanup Method: Siphon oil
- ☐ Waste Destination: _____
- ☐ Containment
- ☐ Contractor Hired
  Name: _____
- ☐ Other: _____

Injuries? ☐ Yes ☒ No **If yes, how many?** ____ **Has an evacuation occurred?** ☐ Yes ☒ No **Potential?** ☐ Yes ☒ No

Are there any resource damages? ☐ Yes ☐ No ☒ Potential **What kinds?** Water

Other Agencies Notified (✓ first column if notified); Check (✓) both columns if on scene

☐ ☐ Fire Department/Hazmat	☐ ☐ Local DNR	☐ ☐ EPA
☐ ☐ Local Law Enforcement	☐ ☐ Div. Emer. Gov.	☐ ☐ Nat'l Resp. Ctr. 800-442-8802
☐ ☐ LEPC or Local Emer. Gov.	☐ ☐ DATCP 608-224-4500	☐ ☐ Chemtrec 800-424-9300
☐ ☐ Regional Response Team	☐ ☐ DHSS 608-266-2830	☐ ☐ Other_____

Incident Commander, if known: _____
Phone: _____

Prepared By: (Print) Kendall Frederick (Sign) Ken Frederick	**Date:** 5-31-96	**Rpt'd to DATCP?** ☐Yes ☐No
Person Notified: Lon Fransen	**Region Notified:** NWD **Time:** 8:00 Am **Date:** 5-21-96	
Invstgtd By: (Print) Ken Frederick (Sign) Lon Fransen	**Date:** 5-21-96	**Site Closed?** ☒Yes ☐No
Spill Coordinator Signoff: [signature]	**Date:** 6/24/96	**Transferred to ERP?** ☒No ☐Yes; Case #_____
		NFA Letter Sent? ☐Yes ☐No
		Spill Packet Sent? ☐Yes ☐No

☐ Additional Comments on Reverse

PLEASE PRINT

State of Wisconsin Substance Release Report (Con't)
Form 4400-91 Rev. 11-95

Date and Military Time of Incident 5-21-96 1:00 AM	Responsible Party G.P. Lionite

Additional Comments:

Oil leaked from Press, pumped into Series of Tanks & then excess went into City Sewer. John Matwick at Treatment Plant Notified DNR & Not G.P. Matwick stated that this happens several times a year but usually only a few Gallons. This Time approx. 500 Gals. Steve Johnson (E.Q Contact at G.P.) has never notified DNR on previous Spills to my Knowledge. G.P. hired Kelly's Septic Service to Go to Treatment Plant & attempt to Skim off Hyd oil & he thought he Recovered most of it. Kelly Stated he has done this for them in the past on a number of occasions. G.P. (Steve Johnson) stated that they normally Burn this waste oil in a Sand Bed incinerator.

Kellys Septic Service
N 7056 Hwy 13.
Phillips, WI. 54555
715-339-2180

Kendall Fredrick

U.S. O

Oil Blending Plant & Lal
425 S. Washington St. Combined
Phone 414-735-8298

Post-it™ brand fax transmittal memo 7671	# of pages ▸ 2
To Mike	From US Oil Co.
Co. Georgia Pacific	Co.
Dept.	Phone #
Fax # 715-339-2120	Fax #

#500 Hydraulic Oil

This MSDS is designed to comply with OSHA Hazard Communication Standard 29 CFR 1910.1200

PRODUCT NAME: #500 Hydraulic Oil

REVISION DATE: 11-25-88

TRANSPORTATION EMERGENCY PH NO (CHEMTREC): (800) 424-9300

IMPORTANT COMPONENTS: Hydrofinished, solvent refined paraffinic petroleum oil

SECTION 1 - HAZARDOUS INGREDIENTS

Nonhazardous per OSHA 29 CFR 1910 1200

SECTION 2 - FIRE AND EXPLOSION HAZARDS

FLASH POINT:	410°F
UPPER FLAMMABLE LIMIT:	Not Determined
LOWER FLAMMABLE LIMIT:	Not Determined
EXTINGUISHING MEDIA:	CO_2, dry chemical, foam
SPECIAL FIREFIGHTING PROCEDURES:	Wear self contained breathing apparatus with full face piece.
UNUSUAL FIRE & EXPLOSION HAZARDS:	Toxic fumes may evolve on burning.

SECTION 3 - HEALTH HAZARD DATA

ORAL TOXICITY:	Greater than 5000 mg/Kg in rats. Based on actual data.
EYE IRRITATION:	None expected.
SKIN IRRITATION:	None expected.
OTHER:	Avoid breathing oil mist.
TLV:	5 mg/m^3

EMERGENCY FIRST AID PROCEDURES

SKIN:	Wash with soap and water. See a physician if irritation persists.
EYE:	Flush with water for 15 minutes.
INHALATION:	Remove to fresh air. See a physician if irritation persists.
ORAL:	Call a physician. DO NOT induce vomiting.
ADDITIONAL:	None

SECTION 4 - SPECIAL PROTECTION INFORMATION

VENTILATION PROCEDURE: Mechanical ventilation recommended.

GLOVES PROTECTION: Neoprene or nitrile rubber gloves recommended.

EYE PROTECTION: Safety glasses

OTHER PROTECTION: Long sleeved shirts recommended.

SECTION 5 - PHYSICAL DATA

SOLUBILITY IN WATER: Negligible below 0.1%

SPECIFIC GRAVITY: 0.880

VISCOSITY: 100.0 cSt @ 40°C

POUR POINT: -25°F

SECTION 6 - STABILITY

STABILITY: Stable

INCOMPATIBILITY: Oxidizing agents

POLYMERIZATION: Will not occur

THERMAL DECOMPOSITION: Oxides of carbon, sulfur

SECTION 7 - SPILL OR LEAK PROCEDURES

SPILL PROCEDURES: Wear rubber boots.
Prevent entry into sewers and waterways. Pick up free liquid for recycle/disposal. Absorb small amounts on inert material for disposal.

WASTE DISPOSAL: If disposed of, this material is believed to be non-hazardous. Disposal should be in compliance with federal, state and local laws.

SECTION 8 - SPECIAL PRECAUTIONS

SPECIAL PRECAUTIONS: Remove contaminated clothing and launder before reuse. Discard contaminated shoes.

SECTION 9 - REGULATORY INFORMATION

OSHA HAZARD COMMUNICATION STANDARD: Not hazardous per 29 CFR 1910 1200

DOT PROPER SHIPPING NAME (BULK, LAND): Not regulated.

TRUCK/RAIL SHIPPING CLASS: Petroleum Lubricating Oil.

The information presented herein has been compiled from sources considered to be dependable and is accurate to the best of seller's knowledge, however, seller makes no warranty whatsoever, expressed, implied or of merchantability regarding the accuracy of such data or the results to be obtained from the use thereof, seller assumes no responsibility for injury to buyer or to third persons or for any damage to any property and buyer assumes all such risks.

WISCONSIN
DEPT. OF NATURAL RESOURCES

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
William H. Smith, District Director

Northwest District Headquarters
PO Box 309, Hwy 70 West
Spooner, WI 54801-0309
TELEPHONE 715-635-2101
FAX 715-635-4105
TDD 715-635-4001

May 26, 1996

Vernon L. Adams
Manager, Field Environmental Engineering
Suite 420
800 Zeagler Drive
Palatka, FL 32177

Steven A. Johnson
Technical Director
P.O. Box 138
Phillips, Wisconsin 54555

Subject: May 21, 1996 Spill at the Lionite Products Plant
Georgia- Pacific
Phillips, Price County, Wisconsin

Gentlemen:

I would like to take this opportunity to thank you for meeting with us last week. It is my understanding that you have taken actions to restore the environment from the spill on March 28, 1995 at the subject site. I appreciate the efforts taken in this regard.

Please be advised, to maintain future compliance you must report all hazardous substance spills in accordance with s. 144.76 Wis. Stats. which states:

> A person who possesses or controls a hazardous substance or who causes the discharge of a hazardous substance shall notify the department immediately . . .

To report a spill please contact the 24 Hour Emergency Hotline at: 1-800-943-0003.

If you should have any questions regarding this letter please feel free to call me at (715)635-4058.

Sincerely,

James A. Hosch
Northwest District Spills Coordinator

cc: Gary LeRoy - Spooner
Lonn Franson - Hayward
Kendall Frederick