DEPARTMENT OF NATURAL RESOURCES
625 EAST COUNTY ROAD Y, SUITE 700
OSHKOSH, WI 54901-9731
(920) 424-7887

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Jim Cox	Jennifer ~~Tobias~~ Borski
COMPANY:	DATE:
Voith Paper	9/29/03
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
920-725-8615	3
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE:	YOUR REFERENCE NUMBER:
General Liability Clarification Request for 401 Byrd Ave, Neenah, WI	

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☑ PLEASE REPLY ☐ PLEASE RECYCLE

Letter dated 2/27/01 requesting additional information is attached.

DEPARTMENT OF NATURAL RESOURCES
625 EAST COUNTY ROAD Y, SUITE 700
OSHKOSH, WI 54901-9731
(920) 424-7887

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Paul Blindauer	Jennifer ~~Tobias~~ Borski
COMPANY:	DATE:
STS	9/29/03
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
920-468-3312	3
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE:	YOUR REFERENCE NUMBER:
General Liability Clarification Request for 401 Byrd Ave, Neenah, WI	

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☑ PLEASE REPLY ☐ PLEASE RECYCLE

Letter dated 2/27/01 requesting additional information is attached.

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott McCallum, Governor
Darrell Bazzell, 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

February 27, 2001

James Cox, Compliance Facilitator
Voith Paper, Neenah Service Center
375 Byrd Avenue
P.O. Box 688
Neenah, WI 54957-0688

SUBJECT: Request for General Liability Clarification Letter for
401 Byrd Avenue, Neenah, WI 54956

Dear Mr. Cox,

On February 12, 2001, the Department received a request for a general liability clarification (GLC) letter regarding a Phase II soil and groundwater investigation at 401 Byrd Avenue in Neenah, WI (Property) from STS Consultants, Ltd. (STS) on behalf of Voith Paper, Neenah Service Center (Voith Paper). The required review fee of $500 for a GLC letter was also received.

The Department has recently reviewed this request along with the notification of soil and groundwater detects submitted by Voith Paper and received on November 29, 2000 and determined that additional information is needed prior to issuing the GLC letter. Please submit the following information as soon as possible. Once this information is received, the Department will continue review of the request for a GLC letter.

- Confirm that McLaren Hart out of Pewaukee, Wisconsin performed the soil and groundwater investigation.
- Submit sampling and preservation methods used during the Phase II investigation.
- Submit a *Monitoring Well Construction Form* (4400-113A) or similar diagram or information to communicate the depth and length of screen used to sample groundwater from soil borings / temporary monitoring wells, B100 and B200.
- The *Well/Drillhole/Borehole Abandonment Forms* (3300-5B) for soil borings B100 through B900 do not indicate under item number four if the sealing material rose to the surface, if the material settled after 24 hours and if so, if the hole was retopped. According to item number seven, the chipped bentonite was filled to 0.5 feet below land surface. Please confirm that the sealing material rose to 0.5 feet below land surface for each borehole, the material did not settle and the borehole was plugged with asphalt from 0.5 feet to surface. Corrected forms do not have to be submitted.

According to STS, the possible contaminant type is "likely petroleum based". STS reports that the activities at the site are refurbishing and reconditioning the rollers used in the paper manufacturing process. The Department needs additional information on the process within your facility to better understand contaminants that potentially exist from residuals on the rollers and the chemicals used in the process to refurbish and recondition the rollers.

According to the publications, *EPA Office of Compliance Sector Notebook Project, Profile of the Pulp and Paper Industry*, EPA/310-R-95-015, and *Kraft Pulp Mill Compliance Assessment Guide*, EPA/310-B-99-001, the specific chemicals used in the paper manufacturing process and effluent include effluent solids, biochemical oxygen demand, chemical oxygen demand, reduced sulfur, inorganic dyes, chlorinated organic compounds, acetone and other items. Also according to these documents, rollers are used to de-water the pulp slurry and to steam the pressed sheets for finished drying. Coatings are also applied at this point.

According to the EPA Fact Sheet, *The Pulp and Paper Industry, the Pulping Process, and Pollutant Releases to the Environment*, EPA-821-F-97-011, other hazardous substances such as formaldehyde, methanol, acetaldehyde and methyl ethyl keytone are also emitted from the paper manufacturing process. Please provide the following:

- Specify what residual contaminants are present on the rollers prior to refurbishing and reconditioning.
- Detail the process and chemicals used at your facility to refurbish and recondition the rollers.
- Indicate the length of time that Voith Paper has performed these activities at this site and if any other historical land uses are known.

As a general note, the report received by STS on February 12, 2001 was officially titled, "No Further Action Request". This is an inappropriate request under ch. NR 708.09, Wis. Adm. Code as no release is documented at the Property and no immediate actions have been taken.

In addition, STS requested "case closure" at the end of the report. This also is an inappropriate request under ch. NR 726, Wis. Adm. Code. Ch. NR 726.02, Wis. Adm. Code states, "This chapter applies to the closure of all cases where response action, other than immediate action, is taken at a site, facility or portion of a site or facility that is subject to regulation under s. 292.11 or 292.31, Stats..." This Property does not meet the definition of a Site under ch. NR 700.03(56), Wis. Adm. Code and no response action has been taken.

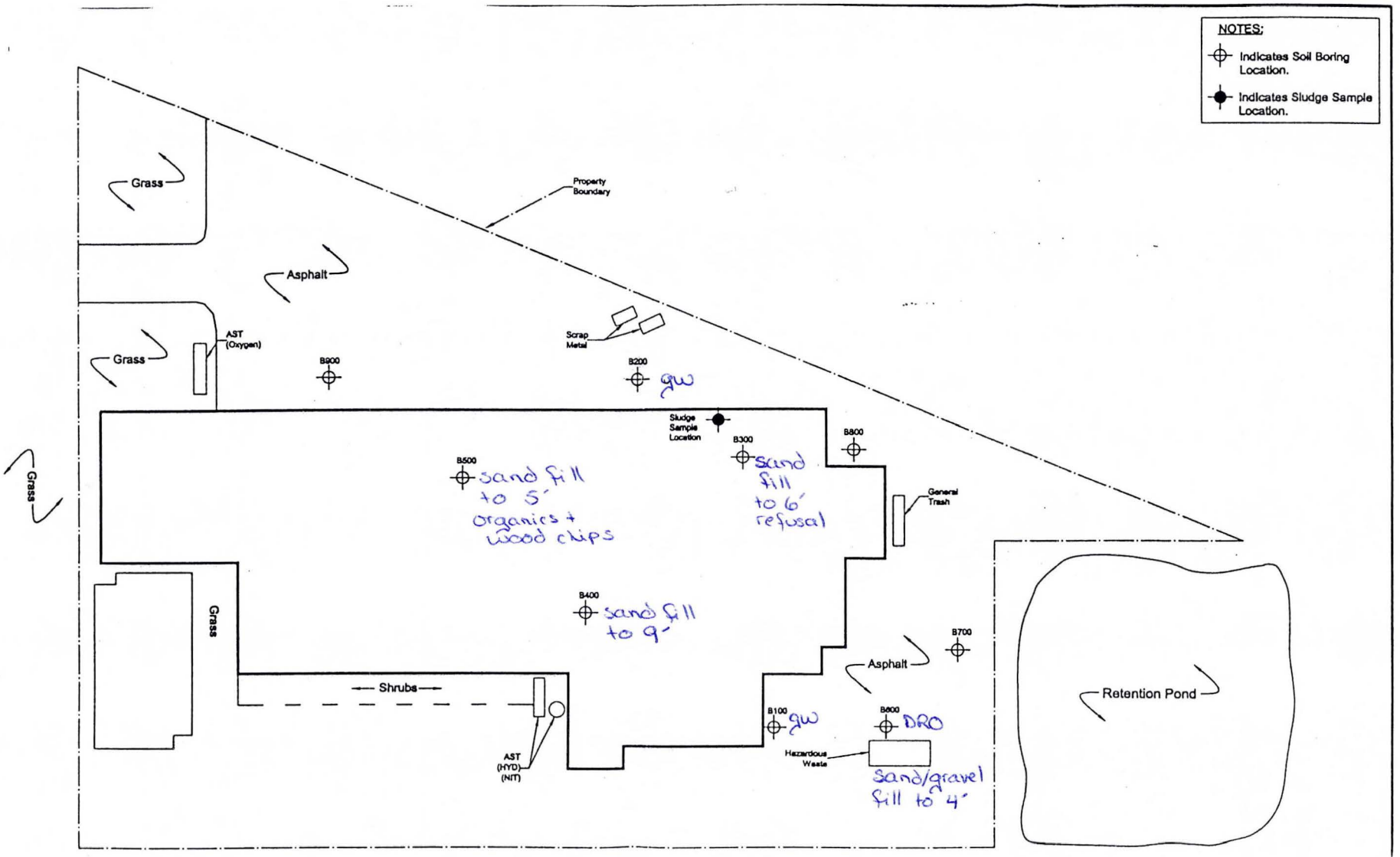
A request for a GLC letter is appropriate and will be issued by the Department once the additional information requested above is submitted. Thank you for your interest in clarifying Voith Paper's environmental responsibility at this Property.

Please call me at the number below if you have any questions.

Sincerely,

Jennifer Tobias
Hydrogeologist
Bureau for Remediation & Redevelopment
(920) 424-7887

cc: Paul Blindauer, STS Consultants, Ltd., 1035 Kepler Dr., Green Bay, WI 54311-8320
Erdmann – DNR, Green Bay



McLaren Hart ENVIRONMENTAL ENGINEERING CORPORATION	DRWN: PDR	CHKD: AGS	Approximate Scale:		Figure 2: Sampling Locations
	PROJECT: 10.000.1082.001	DATE: 11-16-99	1" = 65'		Scapa Rolls, Inc. 375 Byrd Avenue Neenah, WI 54957

VOITH PAPER, NEENAH SERVICE CENTER 2/27/01

375 Byrd Ave (RP Address) / 401 Byrd Ave (Site) J. Tobias

Neenah, WI James Cox, Compliance Facilitator

previous name: Voith, Sulzer Paper Tech.

920-722-7713 (ph)

DRO = 3.5 ppm in soil (S604) } 6-8 ft

Benzene = 0.2 (B100), 0.1 (B200) ppb in gw

Ethylbenzene = 0.1 (B100) ppb in gw

Toluene = 1.5 (B200) ppb in gw

Xylenes = 0.2 (B100) ppb in gw } Collected for property transaction

NFA Request rec'd 2/12/01 (not appropriate request)

GLC Request rec'd 2/12/01 w/ $500 - OK

Case Closure Request rec'd 2/12/01 (not appropriate)

11/13/99 - 9 SB's - DRO, VOC's, PCB's Geol

11/3/99 - 2 Temp Well - VOC's B100, B200 / Clay 7-10 ft bls

Who performed sampling (?) McLaren Hart - Alan Stone 262-523-2040

(*) Need screen depth for TW's + MW construction form or similar documentation

All analytical data rec'd

(*) Need preservation methods for soil + gw samples