Green Bay Packaging Inc.

May 18, 2018

Mr. Richard Joslin
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
625 East County Road Y, Suite 700
Oshkosh, WI 54901

RE: 45-Day Demonstration and No Further Action – Ch. NR 708
Green Bay Packaging Inc. - Green Bay Mill Division
1601 N Quincy St., Green Bay, WI 54302
Reported May 11, 2018, SERTS ID 20180511NE05-1

Dear Mr. Joslin,

In accordance with Wisconsin Administrative Code NR 708.05(6) and NR 708.09, Green Bay Packaging Inc. – Green Bay Mill Division (GBMD) respectfully submits the following documentation describing the immediate actions taken, the outcome of those actions, and a final report and letter of compliance documenting that no further action is necessary to respond to a hazardous substance discharge at the following site.

Responsible Party/Contact:
Green Bay Packaging Inc. – Green Bay Mill Division
1601 N Quincy Street
Green Bay, WI 54302

Andrew Stoub
Environmental Manager
920-433-5010

Location of Discharge Site:
1601 N Quincy Street
Green Bay. WI 54302 (Brown County)
Latitude: 44.52945 Longitude: -88.00499

Date, Time, and Duration of the Discharge: The discharge occurred on Friday May 11, 2018 at approximately 08:00 hours.

Material and Quantity: Approximately 20 gallons of hydraulic oil.

Cause of Discharge: Discharge was a result of a ruptured hydraulic line from a third-party delivery truck.

Area Affected: Approximately 30' x 60' asphalt area and one stormwater catch basin.

Mitigation Efforts that Accelerated Migration of Material: No mitigation efforts accelerated migration of the hydraulic oil.

Initial Spill Notification: The release was reported via the WDNR Spill Hotline at 09:18 hours on May 11, 2018. The SERTS Spill ID is 20180511NE05-1.

Incident Description and Response Action: On May 11, 2018 at approximately 8:00 am, a third-party truck ruptured a hydraulic line. The hydraulic line ruptured while the trailer was in the lifted position, which allowed the release of approximately 20 gallons of hydraulic oil to an asphalt road. The spill was identified immediately, and the closest stormwater catch basin was covered with a storm drain seal cover from a nearby emergency spill kit. Oil dry was used to absorb all free product.

During cleanup, GMBD removed the storm drain seal cover to inspect the catch basin. Approximately one quart of oil had seeped around the cover and entered the catch basin. The weather was dry, with no flow in the stormwater system. GBMD recovered all free product from the catch basin and contracted *H2O Under Pressure* to clean the catch basin, the lateral line to the next catch basin, and the impacted asphalt surface. All cleanup activities were completed by 3:30 pm. Impacted sorbents have been place in a drum for disposal using OSI Environmental Inc. The incident did not result in any release of oil to the Fox River.

Weather Conditions: Weather conditions at the time of release were 39 degrees Fahrenheit, dry, mostly cloudy skies, with winds at 10 mph.

Migration Potential of Release: Due to the interim and remedial actions taken, there were no impacts to human health. Impacts were limited to the asphalt road and one stormwater catch basin. No surface water bodies or wetlands were impacted by the release.

Confirmation Sampling: Confirmation sampling was not conducted. No visual or olfactory evidence of residual impacts were noted after the remedial actions were taken.

Visual and Olfactory Evidence: There is no remaining visible or olfactory evidence of the release.

Actual or Potential Environmental Impacts: Due to the nature of the substance released, the remedial actions taken, and the location of the release, there are no further potential impacts to the environment associated with the release.

Proximity of Contamination to Receptors: No human or environmental receptors came into contact with nor were affected by the release.

Present and Anticipated Land Use: Current and anticipated future land use of this property is industrial/manufacturing.

Exposure Route Assessment: Based on the nature of the substance released, the interim and remedial actions taken, and the location of the release, no complete exposure pathways exist or were present for impact to human or environmental receptors.

Conclusion (Closure Documentation): All practicable response and remediation measure were effectively implemented. The area has been restored to its original conditions and there is no further action necessary for this incident. Maps of the release location are attached (figures 1-2).

If you have questions or require additional information, please do not hesitate to contact me at 920-433-5010 or astoub@gbp.com.

Regards,

Andrew Stoub
Environmental Manager
Green Bay Packaging – Green Bay Mill Division

c: J. Williamson / L. Bauer-Lotto / C. Kananen

Figure 1 – Aerial Overview

Figure 2 – Approximate Impacted Area (red area)

Joslin, Richard R - DNR

From: Joslin, Richard R - DNR
Sent: Friday, May 11, 2018 9:40 AM
To: 'astoub@gbp.com'
Subject: Green Bay Packaging - Hydraulic Fluid Spill (SERTS # 20180511NE05-1)

Andrew

Per our conversation, please note that a documentation report will be needed for the spill referenced above. The report should be submitted to me within 45 days of the incident. The report should include information (i.e., what happened, where it happened, how it was fixed, what remedial activities were performed, etc.) to document spill response activities that occurred. Please make sure that the report includes 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: richard.joslin@wisconsin.gov

If you don't have email you can mail a hard copy of the report to:

Rick Joslin
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
625 East County Road Y, Suite 700
Oshkosh, WI 54901

Thank you for your cooperation with this matter!

Rick

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

Richard R. Joslin
Hydrogeologist / NER Spills Coordinator – Remediation & Redevelopment Bureau
Wisconsin Department of Natural Resources
625 East County Road Y, Suite 700, Oshkosh, WI 54901-9731
Phone: (920) 424-7077
Cell Phone: (920) 360-4291
Richard.Joslin@Wisconsin.gov

dnr.wi.gov

Joslin, Richard R - DNR

From: Joslin, Richard R - DNR
Sent: Friday, May 11, 2018 9:38 AM
To: astoub@gbp.com
Cc: Joslin, Richard R - DNR
Subject: Wisconsin DNR Spill Responsible Party Notification for SERTS ID 20180511NE05-1

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.

May 11, 2018

Spill Occurred: 2018-05-11 08:00
Spill Reported: 2018-05-11 09:18
Substance(s): Hydraulic Oil
SERTS ID: 20180511NE05-1

Spill Location:
1601 N QUINCEY ST
Green Bay, WI
Brown County

Responsible Party:
Green Bay Packaging Company
Andrew Stoub
Env Manager-Mill Division
1601 N Quincey St
[NO RP ADDRESS 2]
Green Bay, WI 54302

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, Wis. Stat.§ 292.11 (3), 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. Codechs. 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 requirementsassociated with these response actions, where a hazardous substance discharge or environmental pollution has occurred. 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 responsecontractor and/or an environmental consultant to help ensure that proper immediate actions are taken and documented. Information about environmental consultants and dnr.wi.gov search "environmental consultants" and "spills".

Review, along with your contractor or consultant, 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 4400-237with 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:

Rick R Joslin
(920) 424-7077
Richard.Joslin@Wisconsin.gov