TSD File Inventory Index

Date: November 3, 2006

Initial: CM Generas

Facility Name: Georgia-Pacific Corporation (One Folder Site)			
Facility Identification Number: MID 042 441 022			
A.1 General Correspondence	X	**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	X	.1 Correspondence	
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	X	**C.1 Compliance - (Inspection Reports)**	
.3 Part A Application and Amendments		**C.2 Compliance/Enforcement**	
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports	X	**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	X
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc		**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total -1

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		**D.5 Corrective Action/Enforcement**	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		**E. Boilers and Industrial Furnaces (BIF)**	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		**F.1 Imagery/Special Studies** (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		**G.1 Risk Assessment**	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Corrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual folders.

A.1 Public Participation

June 13, 1985

End of Comment Period for Georgia-Pacific Corporation, ID# MID042441022

Christine Klemme, EPA

Lorna Jereza

The comment period for Georgia Pacific closed on June 10, 1985.

No comments were received.

VERIFICATION OF RECEIPT OF PUBLIC REVIEW MATERIALS

NAME OF LIBRARY CONTACT, LIBRARY AND LOCATION:

Ms. Shirley Lewandowski
Head Librarian, Reference Section
Kalamazoo Public Library
315 South Rose St.
Kalamazoo, MI 49001

FACILITY NAME, LOCATION AND ID #:

Georgia - Pacific Corp.
MID042441022
2425 King Highway
Kalamazoo, MI 49003

MATERIALS RECEIVED:

Draft Permits

Closure Certification
Public notice

DATE RECEIVED/MADE AVAILABLE TO PUBLIC: 5/3/85

SIGNATURE OF RECEIVING PARTY: Shirley Lewandowski

PLEASE RETURN (IN SELF-ADDRESSED, POSTAGE AND FEES PAID, ENVELOPE) TO:

U.S. Environmental Protection Agency
5HW-13
230 S. Dearborn Street
Chicago, IL 60604

Attention: Christine Klemme

RECEIVED

MAY 10 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

CONTACT CHRISTINE KLEMME AT (312) 886-3715

PUBLIC VOUCHER FOR ADVERTISING

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE U.S. Environmental Protection Agency-5HS-JCK-13, Solid Waste Branch	For Agency Use Only VOUCHER NUMBER
PLACE VOUCHER PREPARED Chicago, Illinois — DATE PREPARED 4/29/85	SCHEDULE NUMBER
NAME OF PUBLICATION KALAMAZOO (Michigan) GAZETTE	PAID BY
NAME OF PUBLISHER OR REPRESENTATIVE R. H. Bastien	
ADDRESS (*Street, room number, city, State, and ZIP code*) 401 S. Burdick Kalamazoo, MI 49003 ATTN: Barb LaBelle, Classified's (616) 345-3511	OK to run 9:30 AM 5/8/85 per Barb LaBelle

CHARGES

TYPEFACE (*size of type*) POINT PER (*inch, square, word, or folio*)

		NUMBER OR LINES (*Indicate counted or space*)	COST PER LINE	TOTAL COST
Line Rates	FIRST INSERTION		$	$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶			
	TOTAL			$

		NUMBER OF UNITS (*Indicate inch, square, word, folio*)	COST PER UNIT	TOTAL COST
Other Rates	FIRST INSERTION		$	$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶			
	TOTAL			$

Attach one copy of advertisement (*including upper and lower rules*) to each copy of voucher here. If copy is not available sign the following affidavit.

TOTAL LINE RATES AND OTHER RATES	
LESS DISCOUNT AT %	
BALANCE DUE	$
VERIFIED (*Initials*)	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE

TITLE — DATE

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN	DATE PUBLISHED
I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.	
SIGNATURE AND TITLE OF CERTIFYING OFFICER	DATE
SIGNATURE AND TITLE OF AUTHORIZING OFFICER	DATE
ACCOUNTING CLASSIFICATION Estimate with affidavit: 200.00 [redacted] 6850200 2540 590090 5A4E058003	PAID BY CHECK NUMBER

[1] If the ability to certify and authority to approve are combined in one person enter "N/A" (*not applicable*) here.

☆ U.S. GPO: 1974—555-598

AM 5/2

September 1973
4 Treasury FRM 2000 Standard Form 1143

ADVERTISING ORDER

551076NALT
ORDER NUMBER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE
U.S. Environmental Protection Agency, Solid Waste Branch, AIS

DATE 4/29/85

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN
Kalamazoo (MI) GAZETTE

SUBJECT OF ADVERTISEMENT	EDITION OF PAPER ADVERTISEMENT APPEARED
Public Notice	Morning
NUMBER OF TIMES ADVERTISEMENT APPEARED	DATE(s) ADVERTISEMENT APPEARED
One time	May 10, 1985 Friday 5/1 0/85

SPECIFICATIONS FOR ADVERTISEMENT

Please place in legal notice/classified section of newspaper

COPY FOR ADVERTISEMENT

See attached sheet

AUTHORITY TO ADVERTISE	INSTRUMENT OF ASSIGNMENT
NUMBER 551076NALT	NUMBER
DATE May 2, 1985	DATE
SIGNATURE OF AUTHORIZING OFFICIAL Brigette Manzke	TITLE

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC. D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 8:00 p.m., November 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to ▶

United States Environmental ProtectionAgency
14th Floor
Financial Operations Section
Chicago, IL 60604

IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

1143-107

PUBLIC NOTICE

The United States Environmental Protection Agency (U.S. EPA) has received a certification of change in status from Georgia-Pacific Corporation (GPC), located at 2425 King Highway, Kalamazoo, Michigan. GPC has stored hazardous waste (as defined by federal law) in containers. This action will change the status of GPC from a storage facility to that of a generator storing for fewer than 90 days (per 40 CFR 262.34). The change in status for this facility was effected by removing hazardous waste stored for longer than 90 days and by limiting the present accumulation period to fewer than 90 days.

The certification of change in status was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act, as amended. U.S. EPA required the certification of change in status when GPC requested a change in status from a storage facility to a small quantity generator.

The certification and related background materials are available to the public at the U.S. EPA, Solid Waste Branch, 230 South Dearborn Street, 13th Floor, Chicago, Illinois 60604, (312) 886-3715, from 8:30 a.m. to 4:30 p.m., Monday through Friday. These materials also may be seen during business hours at the Kalamazoo Public Library, 315 South Rose Street, Kalamazoo, Michigan (contact Ms. Lewandowski, Reference Librarian).

Public comments concerning the certification or this action are invited by U.S. EPA and will be accepted through June 10, 1985. Please send comments to:

U.S. Environmental Protection Agency
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690-3587

ATTN: Christine Klemme

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The United States Environmental Protection Agency (U.S. EPA) has received a certification of change in status from Georgia-Pacific Corporation (GPC) located at 2425 King Highway, Kalamazoo, Michigan. GPC has stored hazardous waste (as defined by federal law) in containers. This action will change the status of GPC from a storage facility to that of a generator storing for fewer than 90 days (per 40 CFR 262.34). The change in status for this facility was effected by removing hazardous waste stored for longer than 90 days and by limiting the present accumulation period to fewer than 90 days.

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U.S. Environmental Protection Agency
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690-3587
ATTN: Christine Klemme

A.2 Part A/
Interim Status

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

MAY 25 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mr. Larry Pio
Georgia-Pacific Corp - Kalamazoo Div.
P.O. Box 2738
Kalamazoo, MI 49003

RE: Interim Status Acknowledgement USEPA ID No. MID042441022
FACILITY NAME: Georgia-Pacific Corp - Kalamazoo Div.

Dear Mr. Pio:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

OK RBS 5-24-82

Enclosure

cc: Robert A. Schumacher, Senior Vice President

FACILITY NAME

GEORGIA PACIFIC CORPORATION PAPER DIV

EPA ID NUMBER

MID042441022

FACILITY OPERATOR

GEORGIA-PACIFIC CORP

FACILITY OWNER

GEORGIA-PACIFIC CORP

FACILITY LOCATION

2425 KING HIGHWAY
KALAMAZOO MI 49003

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
S01	11000.00000	G

OK RBB

KEY

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE
STORAGE:		
CONTAINER	S01	G OR L
TANK	S02	G OR L
WASTE PILE	S03	Y OR C
SURFACE IMPOUNDMENT	S04	G OR L
DISPOSAL:		
INJECTION WELL	D79	G,L,U, OR V
LANDFILL	D80	A OR F
LAND APPLICATION	D81	B OR Q
OCEAN DISPOSAL	D82	U OR V
SURFACE IMPOUNDMENT	D83	G OR L
TREATMENT:		
TANK	T01	U OR V
SURFACE IMPOUNDMENT	T02	U OR V
INCINERATOR	T03	D,W,E, OR H
OTHER	T04	J,R,N,S,U,V

UNIT OF MEASURE	CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS\HOUR	W
GALLONS\HOUR	E
LITERS\HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q
POUNDS\HOUR	J
KILOGRAMS\HOUR	R
TONS PER DAY	N
METRIC TONS\DAY	S

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	MID042441022
NAME OF INSTALLATION	GEORGIA-PACIFIC CORP
II. INSTALLATION MAILING ADDRESS	PO BOX 2738 KALAMAZOO, MI 49003
III. LOCATION OF INSTALLATION	2425 KINGS HWY KALAMAZOO, MI 49003

000013 AUG 13 80

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F MID042441022	A	800813

I. NAME OF INSTALLATION

GEORGIA-PACIFIC CORP. PAPER DIV.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: PO BOX 2738

CITY OR TOWN	ST.	ZIP CODE
KALAMAZOO	MI	49003

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 2425 KING HIGHWAY

CITY OR TOWN	ST.	ZIP CODE
KALAMAZOO	MI	49003

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*	PHONE NO. *(area code & no.)*
DEKAM DAVID MGR OF TECH. SER	616-382-2690

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: GEORGIA-PACIFIC CORP.

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: MID042441022

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

I.D. – FOR OFFICIAL USE ONLY

S													T/A	C
W	M	I	D	0	4	2	4	4	1	0	2	2	2	1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F010				
7	**8**	**9**	**10**	**11**	**12**

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U014	U122	P012	P022	P053	P098
37	**38**	**39**	**40**	**41**	**42**
P105	P106				
43	**44**	**45**	**46**	**47**	**48**

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☒ 1. IGNITABLE (D001) ☒ 2. CORROSIVE (D002) ☒ 3. REACTIVE (D003) ☒ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
William R Walsh	William R Walsh Jr Resident Manager	8-11-80

EPA Form 8700-12 (6-80) REVERSE

DETACH

DETACH

Part A

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER → MID042441022 REACKNOWLEDGEMENT

GEORGIA PACIFIC CORPORATION PAPER DIV
PO BOX 2738
KALAMAZOO MI 49003

INSTALLATION ADDRESS → 2425 KING HIGHWAY
KALAMAZOO MI 49003

EPA Form 8700-12B (4-80) 09/28/81

Georgia-Pacific Corporation

2425 King Highway
Kalamazoo, Michigan 49001
Telephone (616) 382-2890

November 19, 1986

Mr. Alan J. Howard
Chief of Technical Service Section
Hazardous Waste Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Subject: Request for change in status to - "Generator Accumulating Waste On-Site in Compliance with 40 CFR 262.34"

GEN, TSD, PA

Dear Mr. Howard:

Enclosed please find our certification statement requesting change of status to "Generator Accumulating Waste On-Site", revised to contain the current wording from 40 CFR 270.11. It is my understanding that this certification statement is the only remaining item required for our change of status to be effective.

If you have any questions, please contact me at your convenience.

Sincerely,

Al Campbell

Al Campbell P.E.
Ass't Plant Engineer

AC:ddc

Enclosure

cc: F. Shelton
D. Norman
J. Anderson, Atlanta
Lorna M. Jereza, United States Environmental Protection Agency
Chicago, Illinois

RECEIVED
NOV 24 1986
SWD - AIS
U.S. EPA, REGION V

5HS-JCK-13

MAR 21 1986

Mr. Rodney Woods
Georgia-Pacific Corporation
2425 King Highway
Kalamazoo, MI 49003

RE: Request for change in Status
to "Generator Accumulating
Waste On-Site in Compliance
with 40 CFR 262.34"
MID 042 441 022

Dear Mr. Woods:

We have completed our review of your request for a change in status to a generator and the certification of closure you submitted on February 7, 1985. A 30 day public comment period on the request ended on June 10, 1985 and no comments were received.

The request to operate as a generator accumulating waste on-site for fewer than 90 days is hereby approved with the contingency that the certification statement must be revised to contain the current wording from 40 CFR 270.11. It should also be noted that, since the certification form was not signed by a responsible corporate officer, a written authorization is to be submitted to the Director allowing the Environmental Engineer to sign on behalf of the responsible corporate officer must be submitted.

If you have any questions, please contact Ms. Lorna M. Jereza of my staff, at (312) 886-7457.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Alan J. Howard, MDNR

5HS-13:SWB:TPS:MI:L.JEREZA:J.DAVIS:DRAFT 3/4/86
DISK 4

bcc: Mary Villareal

	TYP.	AUTH.	IL. CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	OH. CHIEF	TPS CHIEF	WMB CHIEF	WMD DIR.
INIT. DATE	3-6-86	3-6-86			3-7-86			3/10/86	DAS 3/18/86	3/19/86

5HS-JCK-13

Mr. Rodney Woods
Georgia-Pacific Corporation
2425 King Highway
Kalamazoo, MI 49003

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to "Generator Accumulating
Waste On-Site in Compliance
with 40 CFR 262.34"
MID 042 441 022

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If you have any questions, please contact Ms. Lorna M. Jereza of my staff, at (312) 886-7457.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Alan J. Howard, MDNR

bcc: Mary Villareal

5HS-13:SWB:TPS:MI:L.JEREZA:J.DAVIS:DRAFT 3/4/86
DISK 4

5HS-13

NOV 01 1985

CERTIFIED MAIL° P 139 423 324
RETURN RECEIPT REQUESTED

Mr. Rodney Woods
Georgia-Pacific
2425 Kings Highway
Kalamazoo, Michigan 49003

RE: Corrective Action/Request
For Change To a Generator Status
Facility Name: Georgia-Pacific Corp.
U.S. EPA ID#: MID 042 441 022

Dear Mr. Woods:

As you know, we are currently evaluating your request to change the status of the above-referenced facility to that of a generator only.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the 1984 Amendments) were enacted to modify RCRA. Under the 1984 Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or hazardous waste constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. In addition, all interim status facilities are subject to corrective action requirements, regardless of whether they have 1) submitted a Part B application, 2) submitted a closure plan, 3) reverted to generator status only, 4) actually closed, or 5) none of these. Unless our Agency has formally terminated the facility's interim status, the corrective action requirements apply. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2.

We must determine whether releases of hazardous waste or hazardous waste constituents have ever occurred at the above-referenced facility site. If they have, we must ensure that corrective actions either have been taken or will be taken to eliminate threats to public health or the environment. An important element in our decision process is the information that you provide on the

enclosed certification statement. Please read it carefully and either sign it and return it, or return it unsigned with a cover letter of explanation, within 21 days of the date of this letter. At some point in time, public input will be sought to either confirm or deny information you provide, or information we gather on our own, concerning releases and corrective actions.

Please call Ms. Lorna M. Jereza at (312) 886-7457, if you have any questions.

Sincerely yours,

David A. Stringham
Chief, Solid Waste Branch

Enclosure

bcc: State Permit Manager

5HS-13:WMD:SWB:TPS:MI:J.Mayka:G.Words:7/31/85:J.Davis:CORR:10/16/85:FINAL:10/22/85

	TYP.	AUTH.	IL. CHIEF	IN. CHIEF	OH. CHIEF	MN/WI CHIEF	GR. CHIEF	TPS CHIEF	WMD CHIEF	WMD DIR.
INIT. DATE	10-22-85	10-23-85			10-23			10/25	10/25/85	

10/25/85

csp
10/28/85

Lorna

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
CARLENE J. FLUHARTY
STEPHEN V. MONSMA
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

February 14, 1986

Ms. Edith Ardiente, Chief
Technical Services Section, 5HS-13
U.S. EPA - Region V
230 S. Dearborn
Chicago, Illinois 60604

Re: Georgia-Pacific Corporation
Kalamazoo, Michigan
MID042441022

Dear Ms. Ardiente:

This is to confirm my recent telephone conversation with Lorna Jereza regarding the above-referenced facility's request for a change in status to generator. Based upon our review of Georgia-Pacific's certification regarding potential releases from solid waste management units, we can now recommend approval of the change in status.

Sincerely,

Cheryl Howe

Cheryl Howe, Environmental Engineer
Technical Services Section
Hazardous Waste Division
517-373-2730

cc: Mr. Ken Burda/C&E File
Ms. Lynn Spurr, Plainwell District, HWD
Ms. Lorna Jereza, EPA
Ms. Mary Murphy, EPA

Lorna Jereza, EPA

RECEIVED
SEP 03 1985
SOLID WASTE BRANCH
U.S. EPA, REGION V

August 29, 1985

RECEIVED
SEP 04 1985
SWB - AIS
U.S. EPA, REGION V

Ms. Edith Ardiente, Chief
Technical Programs Section, 5HS-13
U.S. EPA - Region V
230 South Dearborn
Chicago, Illinois 60604

RE: Georgia-Pacific Corp.
Kalamazoo, Michigan
MID042441022 6 TSD PA

Dear Ms. Ardiente:

This is in follow-up to my letters dated June 14 and July 24, 1985, which contained review comments regarding the above-referenced facility's request for a change in status to a generator. We still have not located any information which documents the contents of the unlined sludge settling pits. However, the file contains a letter dated March 17, 1981, which grants approval of a Residual Management Plan for the sludge, which was considered to be relatively inert. A copy of the plan was not in the file.

Since we have been unable to locate any information which documents the composition of the sludge or which verifies the proper disposition of the contents of the settling pits, we recommend that you require the facility to provide such information.

Sincerely,

Cheryl Howe

Cheryl Howe, Environmental Engineer
Technical Services Section
Hazardous Waste Division
(517) 373-2730

cc: Mary Murphy
Lorna Jereza
Lynn Spurr
Ken Burda
C+E File
File

Plainwell District Headquarters
Box 355, Plainwell, Michigan 49080

February 13, 1985

Rodney Woods
Georgia-Pacific
2425 Kings Highway
Kalamazoo, Michigan 49003

Re: EPA ID # - MID 042441022

Dear Mr. Woods:

I have received your response which addresses the Resource Conservation and Recovery Act (RCRA) deficiencies at Georgia-Pacific's Kalamazoo facility.

Based upon my review of your submittal, it has been determined that Georgia-Pacific is in compliance with the specific requirements of RCRA evaluated on the inspection report.

Your request for change in status has been forwarded to the United States Environmental Protection Agency per your request.

If you have any questions regarding this matter, please feel free to contact me at (616) 685-9886.

Sincerely,

LSp

Lynn M. Spurr, Water Quality Specialist
Hazardous Waste Division
Plainwell Compliance District

LMS:ls

cc: U.S. EPA - Region V

REQUEST FOR CHANGE IN STATUS TO:

"GENERATOR ACCUMULATING WASTE ON-SITE IN COMPLIANCE WITH 40 CFR 262.34"

(APPLICABLE TO FACILITIES WHICH, AS OF NOVEMBER 19, 1980, HAVE BEEN STORING WASTES IN CONTAINERS AND/OR TANKS ONLY)

Facility Name:	Georgia-Pacific Corporation
Facility Location:	2425 King Highway, Kalamazoo, MI 49001
Mailing Address:	2425 King Highway, Kalamazoo, MI 49001
U.S. EPA ID NO.:	MID 042441022

1. I certify, in reference to the above-named facility, that a complete and accurate description of the activities currently conducted, for purposes of the Resource Conservation and Recovery Act (RCRA), are those of a generator accumulating waste on-site, in compliance with 40 CFR 262.34. This description of activities shall be considered effective as of February 7, 1985
(please type, in above space: today's date, or other appropriate past date)

2. I certify that all hazardous waste which had been stored at this facility for greater than 90 days have been permanently removed, and -- for that portion of the wastes that were present on-site on or after November 19, 1980 -- the manifest requirements of 40 CFR Part 262 have been complied with, and all manifests are on file at this facility, available for inspection by authorized State and Federal officials.

3. I certify under penalty of the law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

   Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information the information, to the best of my knowledge and belief, is true, accurate and complete.

   I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

David R. Norman	David R. Norman Resident Manager	11/12/86
Signature	Typed Name and Title	Date

RECEIVED
NOV 24 1986
U.S. EPA REGION V

(Please have appropriate official, per 40 CFR 270.11, sign and date)

REQUEST FOR CHANGE IN STATUS TO:

"GENERATOR ACCUMULATING WASTE ON-SITE IN COMPLIANCE WITH 40 CFR 262.34"

(APPLICABLE TO FACILITIES WHICH, AS OF NOVEMBER 19, 1980, HAVE BEEN STORING WASTES IN CONTAINERS AND/OR TANKS ONLY)

RECEIVED
FEB 11 1985
H.W.D. — PLAINWELL

Facility Name:	Georgia-Pacific Corporation
Facility Location:	2425 King Highway, Kalamazoo, MI 49001
Mailing Address:	2425 King Highway, Kalamazoo, MI 49001
U.S. EPA ID No.:	MID 042441022

1. I certify, in reference to the above-named facility, that a complete and accurate description of the activities currently conducted, for purposes of the Resource Conservation and Recovery Act (RCRA), are those of a generator accumulating waste on-site, in compliance with 40 CFR 262.34. This description of activities shall be considered effective as of February 7, 1985
(please type, in above space: today's date, or other appropriate past date)

2. I certify that all hazardous waste which had been stored at this facility for greater than 90 days have been permanently removed, and -- for that portion of the wastes that were present on-site on or after November 19, 1980 -- the manifest requirements of 40 CFR Part 262 have been complied with, and all manifests are on file at this facility, available for inspection by authorized State and Federal officials.

3. I finally certify under penalty of law that I have personally examined, and am familiar with the information submitted in this document and all attachments, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Typed Name and Title	Date
Rodney Woods	Rodney Woods, Environmental Engineer	2-7-85

(Please have appropriate official, per 40 CFR ~~122.6~~ 270.11, sign and date)

XC EPA 2-11-85

HAZARDOUS WASTE MANAGEMENT PLAN

NAME OF FACILITY:	Georgia-Pacific Corporation EPA ID MID 042441022
LOCATION:	2425 King Hwy. Kalamazoo, MI in Kalamazoo County
MAILING ADDRESS:	2425 King Hwy. Kalamazoo, MI 49001
OWNER:	Georgia-Pacific Corporation 133 Peachtree St., NE Atlanta, GA 30303
OPERATOR:	Georgia-Pacific Corporation Attn.: Thomas F. Sullivan Director of Manufacturing 2425 King Hwy. Kalamazoo, MI 49001
FACILITY CONTACT:	Mr. David R. Norman, Resident Manager Georgia-Pacific Corporation 2425 King Hwy. Kalamazoo, MI 49001 Phone: (616) 382-2890

XC: EPA 2-11-85

MID 004 2441022

Georgia-Pacific Corporation *2310 Parklake Drive, N. E.*
P.O. Box 105041
Atlanta, Georgia 30348
Telephone (404) 491-1244

November 19, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

VII

file

Mr. Y. J. Kim
EPA Region V
RCRA Activities
P. O. Box 7861
Chicago, IL 60680

Dear Mr. Kim:

As you know, RCRA Part A Permit Applications under the Resource Conservation and Recovery Act are due from industry by November 19, 1980. EPA has announced that due to certain unclear and ambiguous sections of the RCRA regulations, it has recently published and will publish in the near future Regulatory Interpretative Memoranda (RIM) and Technical Amendments to the Regulations (TAR).

Since these RIM and TAR's were not published promptly enough to include their consideration in our Permit Applications, Georgia-Pacific Corporation reserves the right to amend, add to, or delete from any RCRA Permit Application submitted.

Should these RIM or TAR's require changes on any RCRA Permits, we shall make the necessary changes and notify your office promptly.

Sincerely,

Richard A. Horder

Richard A. Horder
Regional Counsel

RECEIVED 12/10/82

NOV 19 1980

Please print or type in the unshaded areas only
(fill–in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175 461

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

S F M I D 0 4 2 4 4 1 0 2 2 T/A 3 C D

LABEL ITEMS

EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill–in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill–in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold–faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
	16	17	18		19	20	21
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
	22	23	24		25	26	27
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
	28	29	30		31	32	33
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
	34	35	36		37	38	39
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X		J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
	40	41	42		43	44	45

III. NAME OF FACILITY

C 1 SKIP GEORGIA-PACIFIC CORP- KALAMAZOO DIVISION

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*	
C 2 PIO LARRY TECHNICAL DIRECTOR	616	382 2890

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

C 3 PO BOX 2738

B. CITY OR TOWN	C. STATE	D. ZIP CODE
C 4 KALAMAZOO	MI	49003

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

C 5 2425 KING HIGHWAY

B. COUNTY NAME

KALAMAZOO

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
C 6 KALAMAZOO	MI	49003	077

NOV 19 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
7 2621 (specify) paper mill	7 (specify)
C. THIRD	**D. FOURTH**
7 (specify)	7 (specify)

VIII. OPERATOR INFORMATION

A. NAME: 8 GEORGIA-PACIFIC CORPORATION

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)

P (specify)

D. PHONE (area code & no.): A 503 222 5561

E. STREET OR P.O. BOX: 900 S.W. FIFTH AVENUE

F. CITY OR TOWN: B PORTLAND

G. STATE: OR

H. ZIP CODE: 97204

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	9 N	MI 0006190	
D. PSD (Air Emissions from Proposed Sources)	9 P		
B. UIC (Underground Injection of Fluids)	9 U		
E. OTHER (specify)	9		(specify)
C. RCRA (Hazardous Wastes)	9 R		
E. OTHER (specify)	9		(specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9A/50

XII. NATURE OF BUSINESS (provide a brief description)

Production of fine papers for business forms and publication. We are currently producing on two paper machines, with fiber furnished by our deinking facilities, reclaimed blank papers, and purchased pulp

F9A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Robert A. Schumacher Senior Vice President		11/18/80

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill–in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

4/4 1

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S F M I D 0 4 2 4 4 1 0 2 2 T/A 3 C 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

C 8 — YR. 67 — MO. 10 — DAY 20 — FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)* purchase date

[ ] 2. NEW FACILITY *(Complete item below.)*

YR. — MO. — DAY — FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.
1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C DUP T/A 3 C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	~~600~~	~~G~~	
X-2	~~T03~~	~~20~~	~~F~~	
1	S01	11,000 000	G	
2				
3				
4				
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

 CONTINUE ON PAGE 3

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

461

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
S W M I D 0 4 2 4 4 1 0 2 2 T/A 3 C 1	S W DUP T/A 3 C 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D001	5000 000	P	S01	
2	D002	500 000	P	S01	
3	D003	200 000	P	S01	
4	D004	200 000	P	S01	
5	F001	300 000	P	S01	
6	F010	200 000	P	S01	
7					
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25					
26					

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (Continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3

EPA I.D. NO. *(enter from page 1)*

F M I D 0 4 2 4 4 1 0 2 2 T/A 3 C 6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6B/SS

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F6B/SS

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
42 17 10 N	085 33 00 E

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

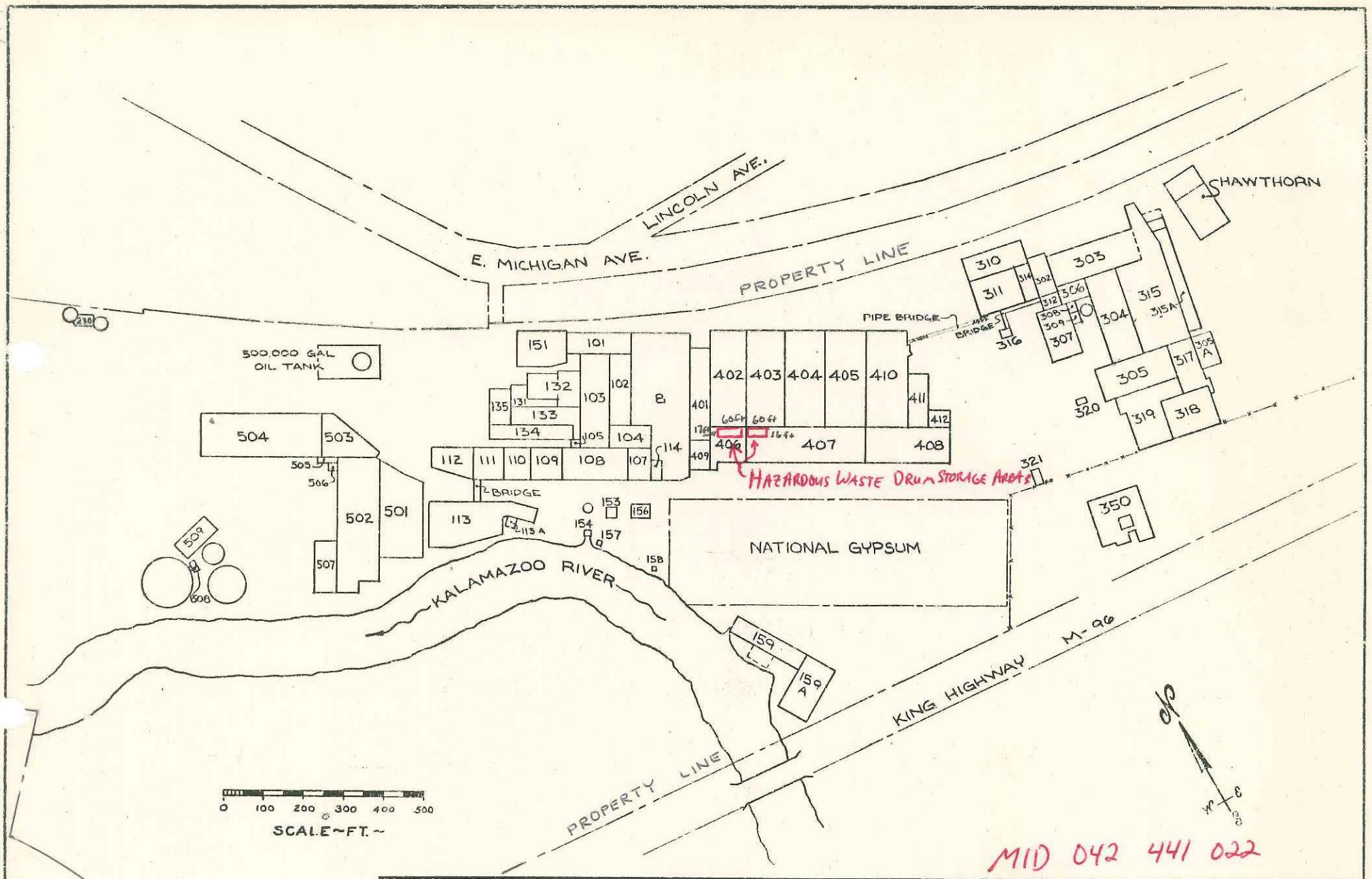
A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Robert A. Schumacher		11/18/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED

 CONTINUE ON PAGE 5



SYM.	REVISION	DATE	BY

SCALE
DR. BY MS
APP.
DATE 9-15-80
REF.

GEORGIA-PACIFIC
KALAMAZOO PAPER DIVISION
KALAMAZOO, MICHIGAN

MILL MAP

AREA | ACCT. | DWG. NO.

A.4 Closure/Post-Closure

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
ARLENE J. FLUHARTY
STEPHEN V. MONSMA
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

RECEIVED
JUL 29 1985
SOLID WASTE BRANCH
U.S. EPA, REGION V

July 24, 1985

Ms. Edith Ardiente, Chief
Technical Programs Section, 5HS-13
U.S. EPA - Region V
230 South Dearborn
Chicago, Illinois 60604

Re: Closure Plan
Georgia Pacific Corp.
Kalamazoo, Michigan
MID042441022

Dear Ms. Ardiente:

This is in follow-up to my letter dated June 14, 1985, which contained review comments regarding the above-referenced facility's request for a change in status to a generator. Enclosed is a copy of a memo sent to me by Lynn Spurr, the district staff person, which summarizes the results of her file search and a recent facility inspection.

As of this date, we have not located the additional department files which document the contents or the status of the unlined settling pits referenced in the memo. If we are able to find any further information, I will forward a summary of it to you.

Please let me know if you have questions regarding our comments.

Sincerely,

Cheryl Howe

Cheryl Howe, Environmental Engineer
Technical Services Section
Hazardous Waste Division
517-373-2730

Enclosure
cc: Mary Murphy, EPA
Lorna Jereza, EPA
Lynn Spurr
Ken Burda
C & E File
File

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

Plainwell District Headquarters

July 17, 1985

TO: Cheryl Howe, Hazardous Waste Division

LSp

FROM: Lynn Spurr, Plainwell District, Hazardous Waste Division

SUBJECT: Georgia Pacific Corporation (MID 042441022), Kalamazoo - Closure

In 1980, Georgia Pacific notified as a storage facility as well as a generator of hazardous waste. Recently, a Request for Change in Status Form was submitted by the company to the U.S. EPA - Region V. The company requested to change their status and operate as a generator only. Following is a summary of the information available in the district which will assist you in evaluation of their closure request:

1. Hazardous Waste, Air Quality, Surface Water/Groundwater Quality District Files -- Available district file information provides documentation of unpermitted effluent losses to the Kalamazoo River (past violations of G-P's NPDES permit). No documentation of spills or other past prior releases was noted in the district files. However, in the past, the company had utilized several sludge settling pits (unlined) at the site. These pits, which contained sludge generated from the pulp manufacturing operations, were either excavated or covered. The excavated material was taken to G-P's landfill. Groundwater Quality Division's Lansing files should provide additional information regarding analysis of the sludge and the excavating/covering of the pits. Staff of the old Resource Recovery Division directed the sludge management program.

3. The facility is not on the CERCLA NPL or Act 307 list.

4. On July 3, 1985, a closure inspection was conducted. The drum storage area which is indoors in a diked area was well-maintained. Drums were in very good condition, properly labeled, and were being accumulated in compliance with 40 CFR 262.34. No signs of improper waste management were noted during the inspection of the plant grounds. An excavated pit was observed. There were no signs of waste in the area. The soil near the NPDES discharge was not discolored. No signs of stressed vegetation were observed.

LMS:ls

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
STEPHEN V. MONSMA
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

June 14, 1985

RECEIVED
JUN 24 1985
SWD-A15
U.S. EPA, REGION V

Ms. Edith Ardiente, Chief
Technical Programs Section
U.S. EPA - Region V
230 S. Dearborn
Chicago, Illinois 60604

Re: Closure Plan
Georgia-Pacific Corp.
Kalamazoo, Michigan
MID042441022

Dear Ms. Ardiente:

The request for a change in status to a generator accumulating waste on-site in compliance with 40 CFR 262.34, submitted by the above-referenced company, has been reviewed as requested in your letter dated April 16, 1985. Our office did not receive any materials to review other than the certification form.

I contacted the district compliance staff person, Lynn Spurr, to find out whether the facility had been inspected within the past year. She verified that it had been and that the indoor container storage area was in good condition. She committed to doing a file search by the end of June to determine whether there have been any prior releases of waste at the facility. I will notify you of her findings by July 19, 1985. The Part A application we have on file indicates that the following hazardous wastes may have been stored at the facility: D001, D002, D003, D004, F001, and K010.

It should be noted that the certification form does not appear to have been signed, in accordance with 40 CFR 270.11, by a responsible corporate officer or by a duly authorized representative of that person. The certification was not accompanied by a copy of a written authorization submitted to the Director, allowing the environmental engineer to sign on behalf of the responsible corporate officer. In addition, the wording of the certification statement on the form is out-of-date.

Please contact me if you have any questions regarding my comments.

Sincerely,

Cheryl Howe

Cheryl Howe, Environmental Engineer
Technical Services Section
Hazardous Waste Division
517/373-2730

cc: K. Burda
L. Jereza
M. Higgins
L. Spurr
C & E File
File

Yellow

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5HS-13

APR 16 1985

Mr. Alan J. Howard, Chief
Technical Services Section
Hazardous Waste Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

RE: Closure Plan
GEORGIA-PACIFIC CORP.
KALAMAZOO, MICHIGAN
MID 042441022

Dear Mr. Howard:

Enclosed is/~~are~~ one (1) copy(~~s~~) of a closure plan for the referenced facility. Please perform a technical evaluation of the plan, and provide us your comments by JUNE 12, 1985.

If you have any questions on the closure plan, please contact L. M. JEREZA of my staff, at (312) 886-6146.

Sincerely,

Edith M. Ardiente

Edith M. Ardiente, P.E.
Chief, Technical Programs Section

Enclosure(s)

cc: Mary Higgins
HWDMS Update File

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	~~STU #3~~ CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	G.W.	LMG			MI			
DATE	4-16-85	4-16-85			4-16-85			

SFL-5

Georgia-Pacific Corporation

Law Department

133 Peachtree Street, N.E.
P. O. Box 105605
Atlanta, Georgia 30348
Telephone (404) 521-4846

Richard A. Horder
Associate General Counsel

RECEIVED
MAR 31 1986
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

March 31, 1986

Regional Administrator
Region V
United States Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604
Attn: RCRA Financial Assurance

RE: Georgia-Pacific Corporation Financial Responsibility Requirements for Georgia-Pacific Corporation - Kalamazoo, Michigan

Dear Sir:

Pursuant to the regulations of the United States EPA concerning the financial assurance requirements for facilities and/or subsidiaries which treat, store or dispose of hazardous wastes, enclosed are the following documents:

1. Letter from Chief Financial Officer;
2. Special report from our independent, certified accountant; and
3. 1985 Annual Report.

Please note the following plants have been deleted from last year's report because they were sold:

- Lockport, IL
- Farmingdale, NY
- Painesville, OH

Also, the following facilities are no longer TSD facilities; therefore, they have been deleted from the report:

- Crossett, AK
- Lufkin, TX
- Pine Bluff, AK
- Pryor, OK
- Houston, TX

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

MAR 2 6 1987

REPLY TO THE ATTENTION OF:
5HE-12

U.S. EPA ID #: MID042441022

GEORGIA-PACIFIC CORP KALAMAZOO DIV
PO BOX 2738
KALAMAZOO MI 49003

Re: RCRA Financial Responsibility

Dear Owner/Operator:

On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the United States Environmental Protection Agency (U.S. EPA) to administer a hazardous waste program in lieu of the Federal program. As a result of final authorization, Michigan is required to enforce the provisions of the Resource Conservation and Recovery Act (RCRA). One of these provisions (40 CFR Part 265, Subpart H) requires all hazardous waste facilities to demonstrate financial responsibility for liability coverage and closure/post-closure care.

To implement this aspect of authorization, financial documents must be written to satisfy the requirements of the Michigan Administrative Code 1985 AACS, Part 7, which is the Michigan equivalent of 40 CFR Part 265, Subpart H. This letter is to notify you that your financial test should be updated and sent to the Director of the Michigan Department of Natural Resources within 90 days after the close of your fiscal year.

If you have any questions or desire additional information, please contact Ms. Sharon Johnson at (312) 886-4581 or Ronald Brown at (312) 353-7921.

Sincerely yours,

Wm. E. Muno

William E. Muno, Chief
RCRA Enforcement Section

cc: John Bohunsky, MDNR

(GB)
MID042441022

RECEIVED
WASTE MANAGEMENT
BRANCH

March 31, 1985

Regional Administrator
Region V, Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

Dear Sir:

I am the chief financial officer of Georgia-Pacific Corporation, 133 Peachtree Street, Atlanta, Georgia 30303. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

EPA I.D. NO.	FACILITY LOCATION
REGION IV	
SCD991289695	Georgia-Pacific Corporation P. O. Box 6347 Spartanburg, South Carolina 29304
REGION V	
ILD049816432	Georgia-Pacific Corporation No. 1 Label Lane Lockport, Illinois 60441
MID042441022	Georgia-Pacific Corporation Paper Division P. O. Box 2738 Kalamazoo, Michigan 49003

REGION VI

ARD006345403	Georgia-Pacific Corporation 205 Michigan Street Box 7086 Pine Bluff, Arkansas 71601
OKD007217425	Georgia-Pacific Corporation Route 69-A P. O. Box 578 Pryor, Oklahoma 74361
TXD08836081	Georgia-Pacific Corporation Bellingham Division 10120 Hirsch Road Houston, TX 77016

REGION IX

CAD085393080	Georgia-Pacific Corporation Chem-Pac Operations 2501 Malt Avenue City of Commerce, California 90040
CAD009380890	Georgia-Pacific Corporation Chem-Pac Operations 760 South Vail P. O. Box 22046 Montebello, California 90040
CAD089184097	Georgia-Pacific Corporation 90 W. Redwood Avenue Fort Bragg, California 95437
CAD096233564	Georgia-Pacific Corporation 75 W. Valpico Road P. O. Box 239 Tracy, California 95376

REGION X

ORD009411505	Georgia-Pacific Corporation P. O. Box 580 Toledo, Oregon

WAD057311334	Georgia-Pacific Corporation Chem-Pac Operations 111 3rd Street, N.W. Auburn, Washington 98002
WAD009252297	Georgia-Pacific Corporation 300 Laurel Street P. O. Box 1236 Bellingham, Washington 98227
WAD050175918	Georgia-Pacific Corporation 1203 Fones Road P. O. Box 547 Olympia, Washington 98507

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE AND POST-CLOSURE COSTS
REGION V		
MID042441022	Georgia-Pacific Corporation Paper Division P.O. Box 2738 Kalamazoo, Michigan 49003	3,432
REGION X		
WAD057311334	Georgia-Pacific Corporation Chem-Pac Operations 111 3rd Street, N.W. Auburn, Washington 98002	9,048
WAD009252297	Georgia-Pacific Corporation 300 Laurel Street P. O. Box 1236 Bellingham, Washington 98227	217,000
WAD050175918	Georgia-Pacific Corporation 1203 Fones Road P. O. Box 547 Olympia, Washington 98507	11,100

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE AND POST-CLOSURE COSTS
REGION II		
NYD047663505	Polymer, Inc. 100-120 Adams Boulevard P. O. Box 250 Farmingdale, New York 11735	66,465
REGION V		
OHD054026679	Georgia-Pacific Resins, Inc. 1975 Watkins Road Columbus, Ohio 43207	40,000
OHD000721480	Georgia-Pacific Plastics, Inc. 786 Hardy Road Painesville, Ohio 44077	27,040
REGION VI		
ART060010048	Georgia-Pacific Resins, Inc. P. O. Box 520 Crossett, Arkansas 71635	57,096
TXD074160391	Georgia-Pacific Resins, Inc. 1429 East Lufkin P. O. Box 938 Lufkin, Texas 75901	22,880
REGION IX		
CAT000624296	Georgia-Pacific Resins, Inc. 2163 N. State Street Ukiah, California 95482	28,565
REGION X		
WAD009248774	Georgia-Pacific Resins, Inc. 1754 Thorne Road Tacoma, Washington 98421	27,040
ORD000405233	Georgia-Pacific Resins, Inc. P. O. Box 1068 Albany, Oregon 97321	15,000

March 31, 1985

Department of Natural Resources
Office of Hazardous Waste Management
P.O. Box 30028
Lansing, MI 48909

Dear Sirs:

I am the chief financial officer of Georgia-Pacific Corporation, 133 Peachtree Street, Atlanta, Georgia 30303. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

EPA I.D. NO.	FACILITY LOCATION
REGION IV	
SCD991289695	Georgia-Pacific Corporation P. O. Box 6347 Spartanburg, South Carolina 29304
REGION V	
ILD049816432	Georgia-Pacific Corporation No. 1 Label Lane Lockport, Illinois 60441
MID042441022	Georgia-Pacific Corporation Paper Division P. O. Box 2738 Kalamazoo, Michigan 49003

REGION VI

ARD006345403	Georgia-Pacific Corporation 205 Michigan Street Box 7086 Pine Bluff, Arkansas 71601
OKD007217425	Georgia-Pacific Corporation Route 69-A P. O. Box 578 Pryor, Oklahoma 74361
TXD08836081	Georgia-Pacific Corporation Bellingham Division 10120 Hirsch Road Houston, TX 77016

REGION IX

CAD085393080	Georgia-Pacific Corporation Chem-Pac Operations 2501 Malt Avenue City of Commerce, California 90040
CAD009380890	Georgia-Pacific Corporation Chem-Pac Operations 760 South Vail P. O. Box 22046 Montebello, California 90040
CAD089184097	Georgia-Pacific Corporation 90 W. Redwood Avenue Fort Bragg, California 95437
CAD096233564	Georgia-Pacific Corporation 75 W. Valpico Road P. O. Box 239 Tracy, California 95376

REGION X

ORD009411505	Georgia-Pacific Corporation P. O. Box 580 Toledo, Oregon

WAD057311334	Georgia-Pacific Corporation Chem-Pac Operations 111 3rd Street, N.W. Auburn, Washington 98002
WAD009252297	Georgia-Pacific Corporation 300 Laurel Street P. O. Box 1236 Bellingham, Washington 98227
WAD050175918	Georgia-Pacific Corporation 1203 Fones Road P. O. Box 547 Olympia, Washington 98507

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE AND POST-CLOSURE COSTS
REGION V		
MID042441022	Georgia-Pacific Corporation Paper Division P.O. Box 2738 Kalamazoo, Michigan 49003	3,432
REGION X		
WAD057311334	Georgia-Pacific Corporation Chem-Pac Operations 111 3rd Street, N.W. Auburn, Washington 98002	9,048
WAD009252297	Georgia-Pacific Corporation 300 Laurel Street P. O. Box 1236 Bellingham, Washington 98227	217,000
WAD050175918	Georgia-Pacific Corporation 1203 Fones Road P. O. Box 547 Olympia, Washington 98507	11,100

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE AND POST-CLOSURE COSTS
REGION II		
NYDO47663505	Polymer, Inc. 100-120 Adams Boulevard P. O. Box 250 Farmingdale, New York 11735	66,465
REGION V		
OHD054026679	Georgia-Pacific Resins, Inc. 1975 Watkins Road Columbus, Ohio 43207	40,000
OHD000721480	Georgia-Pacific Plastics, Inc. 786 Hardy Road Painesville, Ohio 44077	27,040
REGION VI		
ART060010048	Georgia-Pacific Resins, Inc. P. O. Box 520 Crossett, Arkansas 71635	57,096
TXD074160391	Georgia-Pacific Resins, Inc. 1429 East Lufkin P. O. Box 938 Lufkin, Texas 75901	22,880
REGION IX		
CAT000624296	Georgia-Pacific Resins, Inc. 2163 N. State Street Ukiah, California 95482	28,565
REGION X		
WAD009248774	Georgia-Pacific Resins, Inc. 1754 Thorne Road Tacoma, Washington 98421	27,040
ORD000405233	Georgia-Pacific Resins, Inc. P. O. Box 1068 Albany, Oregon 97321	15,000

ORT420010019	Georgia-Pacific Resins, Inc. P. O. Box 9 Coos Bay, Oregon 97420	48,048

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE AND POST-CLOSURE COSTS
ARKANSAS		
ARD006345403	Georgia-Pacific Corporation 205 Michigan Street Box 7086 Pine Bluff, Arkansas 71601	3,432
CALIFORNIA		
CAD085393080	Georgia-Pacific Corporation Chem-Pac Operations 2501 Malt Avenue City of Commerce, California 90040	45,760
CAD009380890	Georgia-Pacific Corporation Chem-Pac Operations 760 South Vail P. O. Box 22046 Montebello, California 90040	57,200
CAD089184097	Georgia-Pacific Corporation 90 W. Redwood Avenue Fort Bragg, California 95437	3,432
CAD096233564	Georgia-Pacific Corporation 75 W. Valpico Road P. O. Box 239 Tracy, California 95376	57,096

ILLINOIS

ILD049816432	Georgia-Pacific Corporation No. 1 Label Lane Lockport, Illinois 60441	5,720

OKLAHOMA

OKD007217425	Georgia-Pacific Corporation Route 69-A P. O. Box 578 Pryor, Oklahoma 74361	6,864

OREGON

ORD009411505	Georgia-Pacific Corporation P. O. Box 580 Toledo, Oregon	5,720

SOUTH CAROLINA

SCD991289695	Georgia-Pacific Corporation P. O. Box 6347 Spartanburg, South Carolina 29304	11,440

TEXAS

TXD08836081	Georgia-Pacific Corporation Bellingham Division Houston Chemical Plant 10120 Hirsch Road Houston, Texas 77016	11,440

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: NONE.

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1984.

ALTERNATIVE II

1.	Sum or current closure and post-closure cost estimates (total of all cost estimates listed above)	$ 780,818.00
2.	Amount of annual aggregate liability coverage to be demonstrated	$ 1,000,000.00 each occurrence for sudden accidental $ 2,000,000.00 aggregate for sudden accidental $ 3,000,000.00 each occurrence for nonsudden accidental $ 6,000,000.00 aggregate for nonsudden accidental
3.	Sum of lines 1 and 2	$ 8,780,818.00
4.	Current bond rating of most recent issuance and name of rating service	A2, Moody
5.	Date of issuance of bond	12-1-84
6.	Date of maturity of bond	12-1-2014
*7.	Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	2.225 Billion
*8.	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	N/A

		YES	NO
9.	Is line 7 at least $10 million?	x	
10.	Is line 7 at least 6 times line 3?	x	
*11.	Are at least 90% of assets located in the U.S.? If not, complete line 12	x	

12. Is line 8 at least 6 times line 3? N/A

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

James C. Van Meter
Executive Vice President - Finance

Date: March 31, 1985

March 31, 1985

Director,
Ohio Environmental Protection Agency
361 East Broad Street
Columbus, OH

Dear Sir:

I am the Chief Financial Officer of Georgia-Pacific Corporation, 133 Peachtree Street, N.E., Atlanta, GA 30303. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage "and closure and/or post-closure care" as specified in Chapters 3745-55 and 3745-66 of the Administrative Code.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code: NONE. See Attachment 1.

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Chapters 3745-55 or 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE AND POST-CLOSURE COSTS
REGION V		
MID042441022	Georgia-Pacific Corporation Paper Division P.O. Box 2738 Kalamazoo, Michigan 49003	3,432

REGION X

WAD057311334	Georgia-Pacific Corporation Chem-Pac Operations 111 3rd Street, N.W. Auburn, Washington 98002	9,048
WAD009252297	Georgia-Pacific Corporation 300 Laurel Street P. O. Box 1236 Bellingham, Washington 98227	217,000
WAD050175918	Georgia-Pacific Corporation 1203 Fones Road P. O. Box 547 Olympia, Washington 98507	11,100

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Chapters 3745-55 and 3745-66 of the Administrative Code, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE AND POST-CLOSURE COSTS
REGION II		
NYD047663505	Polymer, Inc. 100-120 Adams Boulevard P. O. Box 250 Farmingdale, New York 11735	66,465
REGION V		
OHIO PERMIT NO. 01-25-0259 OHD054026679	Georgia-Pacific Resins, Inc. 1975 Watkins Road Columbus, Ohio 43207	40,000
OHIO PERMIT NO. 02-43-0258 OHD000721480	Georgia-Pacific Plastics, Inc. 786 Hardy Road Painesville, Ohio 44077	27,040
REGION VI		
ART060010048	Georgia-Pacific Resins, Inc. P. O. Box 520 Crossett, Arkansas 71635	57,096

TXD074160391	Georgia-Pacific Resins, Inc. 1429 East Lufkin P. O. Box 938 Lufkin, Texas 75901	22,880

REGION IX

CAT000624296	Georgia-Pacific Resins, Inc. 2163 N. State Street Ukiah, California 95482	28,565

REGION X

WAD009248774	Georgia-Pacific Resins, Inc. 1754 Thorne Road Tacoma, Washington 98421	27,040
ORD000405233	Georgia-Pacific Resins, Inc. P. O. Box 1068 Albany, Oregon 97321	15,000
ORT420010019	Georgia-Pacific Resins, Inc. P. O. Box 9 Coos Bay, Oregon 97420	48,048

3. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated to the Director through the financial test or any other financial assurance mechanism specified in Chapters 3745-55 or 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE AND POST-CLOSURE COSTS
ARKANSAS		
ARD006345403	Georgia-Pacific Corporation 205 Michigan Street Box 7086 Pine Bluff, Arkansas 71601	3,432

CALIFORNIA

CAD085393080	Georgia-Pacific Corporation Chem-Pac Operations 2501 Malt Avenue City of Commerce, California 90040	45,760
CAD009380890	Georgia-Pacific Corporation Chem-Pac Operations 760 South Vail P. O. Box 22046 Montebello, California 90040	57,200
CAD089184097	Georgia-Pacific Corporation 90 W. Redwood Avenue Fort Bragg, California 95437	3,432
CAD096233564	Georgia-Pacific Corporation 75 W. Valpico Road P. O. Box 239 Tracy, California 95376	57,096

ILLINOIS

ILD049816432	Georgia-Pacific Corporation No. 1 Label Lane Lockport, Illinois 60441	5,720

OKLAHOMA

OKD007217425	Georgia-Pacific Corporation Route 69-A P. O. Box 578 Pryor, Oklahoma 74361	6,864

OREGON

ORD009411505	Georgia-Pacific Corporation P. O. Box 580 Toledo, Oregon	5,720

SOUTH CAROLINA

SCD991289695	Georgia-Pacific Corporation P. O. Box 6347 Spartanburg, South Carolina 29304	11,440

TEXAS

TXD08836081	Georgia-Pacific Corporation Bellingham Division 10120 Hirsch Road Houston, Texas 77016	11,440

This owner or operator "is required" to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's operator's independently audited year-end financial statements for the latest completed fiscal year, ended December 31, 1984.

ALTERNATIVE II

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	$ 780,818.00
2.	Amount of annual aggregate liability coverage to be demonstrated	$ 1,000,000.00 each occurrence for sudden accidental $ 2,000,000.00 aggregate for sudden accidental $ 3,000,000.00 each occurrence for nonsudden accidental $ 6,000,000.00 aggregate for nonsudden accidental
3.	Sum of lines 1 and 2	$ 8,780,818.00
4.	Current bond rating of most recent issuance and name of rating service	A2, Moody
5.	Date of issuance of bond	12-1-84
6.	Date of maturity of bond	12-1-2014
*7.	Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	$ 2.225 Billion
8.	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	N/A

	YES	NO
9. Is line 7 at least $10 million?	x	
10. Is line 7 at least 6 times line 3?	x	
*11. Are at least 90% of assets located in the U.S.? If not, complete line 12	x	
12. Is line 8 at least 6 times line 3?	N/A	

I hereby certify that the wording of this letter is identical to the wording specified in Paragraph (G) of Rule 3745-55-51 of the Administrative Code as such regulations were constituted on the date shown immediately below.

James C. Van Meter
Executive Vice President - Finance

Date: March 31, 1985

PAH

ATTACHMENT 1

Georgia-Pacific Corporation owns or operates the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE AND POST-CLOSURE COSTS
REGION IV		
SCD991289695	Georgia-Pacific Corporation P. O. Box 6347 Spartanburg, South Carolina 29304	11,440
REGION V		
ILD049816432	Georgia-Pacific Corporation No. 1 Label Lane Lockport, Illinois 60441	5,720
MID042441022	Georgia-Pacific Corporation Paper Division P. O. Box 2738 Kalamazoo, Michigan 49003	3,432
REGION VI		
ARD006345403	Georgia-Pacific Corporation 205 Michigan Street Box 7086 Pine Bluff, Arkansas 71601	3,432
OKD007217425	Georgia-Pacific Corporation Route 69-A P. O. Box 578 Pryor, Oklahoma 74361	6,864
TXDO8836081	Georgia-Pacific Corporation Bellingham Division 10120 Hirsch Road Houston, TX 77016	11,440
REGION IX		
CAD085393080	Georgia-Pacific Corporation Chem-Pac Operations 2501 Malt Avenue City of Commerce, California 90040	45,760

CAD009380890	Georgia-Pacific Corporation Chem-Pac Operations 760 South Vail P. O. Box 22046 Montebello, California 90040	57,200
CAD089184097	Georgia-Pacific Corporation 90 W. Redwood Avenue Fort Bragg, California 95437	3,432
CAD096233564	Georgia-Pacific Corporation 75 W. Valpico Road P. O. Box 239 Tracy, California 95376	57,096

REGION X

ORD009411505	Georgia-Pacific Corporation P. O. Box 580 Toledo, Oregon	5,720
WAD057311334	Georgia-Pacific Corporation Chem-Pac Operations 111 3rd Street, N.W. Auburn, Washington 98002	9,048
WAD009252297	Georgia-Pacific Corporation 300 Laurel Street P. O. Box 1236 Bellingham, Washington 98227	217,000
WAD050175918	Georgia-Pacific Corporation 1203 Fones Road P. O. Box 547 Olympia, Washington 98507	11,100

CORPORATE GUARANTEE
FOR CLOSURE OR POST-CLOSURE CARE

Guarantee made this 31st day of March, 1985 by Georgia-Pacific Corporation, a business corporation organized under the laws of the State of Georgia, herein referred to as Guarantor, to the Ohio Environmental Protection Agency, Obligee, on behalf of our subsidiary Georgia-Pacific Resins, Inc. of 133 Peachtree Street, N.E., Atlanta, Georgia 30303.

Recitals

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in paragraph (F) of rule 3745-55-43 and 3745-55-45 of the Administrative Code or paragraph (E) of Rule 3745-66-43 and 3745-66-45 of the Administrative Code.

2. Georgia-Pacific Resins, Inc. owns or operates the following hazardous waste management facility covered by this guarantee:

Permit Numbers	Facility Location	Closure Costs	Post Closure Costs
EPA OHD054026679 Ohio 01-25-0259	Georgia-Pacific Resins, Inc. 1975 Watkins Road Columbus, OH 43207	$40,000	N/A

3. "Closure plans" and "post-closure plans" as used below refer to the plans maintained as required by Chapters 3745-55 and 3745-66 of the Administrative Code for the closure and post-closure care of facilities as identified above.

4. For value received from Georgia-Pacific Resins, Inc. Guarantor guarantees to EPA that in the event that Georgia-Pacific Resins, Inc. fails to perform closure and post-closure care of the above facility in accordance with the closure or post-closure plans and other permit or interim status requirements whenever required to do so, the Guarantor shall do so or establish a trust fund as specified in Chapters 3745-55 and 3745-66 of the Administrative Code, as applicable, in the name of Georgia-Pacific Resins, Inc. in the amount of the current closure or post-closure cost estimates as specified in Chapters 3745-55 and 3745-66 of the Administrative Code.

5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the Guarantor fails to

meet the financial test criteria, Guarantor shall send within ninety days, by certified mail, notice to the Director, Ohio EPA and to Georgia-Pacific Resins, Inc. that he intends to provide alternate financial assurance as specified in Chapters 3745-55 and 3745-66 of the Administrative Code, as applicable, in the name of Georgia-Pacific Resins, Inc. Within one hundred twenty days after the end of such fiscal year, the Guarantor shall establish such financial assurance unless Georgia-Pacific Resins, Inc. has done so.

6. The Guarantor agrees to notify the Director by certified mail, of a voluntary or involuntary proceeding under "Title 11 (Bankruptcy)," U.S. Code, naming Guarantor as debtor, within ten days after commencement of the proceeding.

7. Guarantor agrees that within thirty days after being notified by the director of a determination that Guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in Chapters 3745-55 and 3745-66 of the Administrative Code, as applicable, in the name of Georgia-Pacific Resins, Inc. unless Georgia-Pacific Resins, Inc. has done so.

8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following:

Amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure, or any other modification or alteration of an obligation of the owner or operator pursuant to Chapters 3745-55 and 3745-66 of the Administrative Code.

9. Guarantor agrees to remain bound under this guarantee for so long as Georgia-Pacific Resins, Inc. must comply with the applicable financial assurance requirements of Chapters 3745-55 and 3745-66 of the Administrative Code for the above-listed facilities, except that Guarantor may cancel this guarantee by sending notice by certified mail to the Director and to Georgia-Pacific Resins, Inc., such cancellation to become effective no earlier than one hundred twenty days after receipt of such notice by both Ohio EPA and Georgia-Pacific Resins, Inc. as evidenced by the return receipts.

10. Guarantor agrees that if Georgia-Pacific Resins, Inc. fails to provide alternate financial assurance as specified in Chapters 3745-55 and 3745-66 of the Administrative Code, as applicable, and obtain written approval of such assurance from the Director within ninety days after a notice of cancellation by the

Guarantor is received by the Director from the Guarantor, Guarantor shall provide such alternate financial assurance in the name of Georgia-Pacific Resins, Inc.

11. Guarantor expressly waives notice of acceptance of this guarantee by the Ohio EPA or by Georgia-Pacific Resins, Inc. Guarantor also expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments or modifications of the facility permit.

I hereby certify that the wording of this guarantee is identical to the wording specified in Paragraph (H) of Rule 3745-55-51 of the Administrative Code as such regulations were constituted on the date first above written.

Effective date: March 31, 1985

Georgia-Pacific Corporation

RAH

James C. Van Meter
Executive Vice President - Finance

Rebecca H. Young
Signature of Witness or Notary

HAZARDOUS WASTE FACILITY

CERTIFICATE OF LIABILITY INSURANCE

1. National Union Fire Insurance Co. (the "Insurer") of Pittsburgh, PA hereby certifies that it has issued liability insurance covering bodily injury and property damage to GEORGIA-PACIFIC RESINS, INC., (the "Insured"), of 133 Peachtree Street, N.E., Atlanta, Georgia 30303 in connection with the insured's obligation to demonstrate financial responsibility under Rule 3745-55-47 of the Administrative Code. The coverage applies at EPA Identification Number OHD054026679, Georgia-Pacific Resins, Inc., 1975 Watkins Road, Columbus, Ohio 43207, Ohio Permit Number 01-25-0259, for sudden accidental occurrences. The limits of liability are one million dollars per each occurrence and two million dollars per annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number GLA1940357RA, issued on 4/1/85. The effective date of said policy is 4/1/85-4/1/86.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in Paragraph (F) of Rule 3745-66-47 of the Administrative Code.

(c) Whenever requested by The Director of the Ohio Environmental Protection Agency, the Insurer agrees to furnish to the Director a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty days after a copy of such written notice is received by the Director.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty days after a copy of such written notice is received by the Director.

I hereby certify that the wording of this instrument is identical to the wording specified in Paragraph (J) of Rule 3745-55-51 of the Administrative Code as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Signature of Authorized Representative of Insurer

Bradley N. Tennant
Typed Name

Special Accounts Manager, Authorized Representative
Title

of National Union Fire Insurance Co.
Name of Insurer

National Union Insurance Companies
Address of Representative
270 Carpenter Dr., Atlanta, GA 30328

CORPORATE GUARANTEE
FOR CLOSURE OR POST-CLOSURE CARE

Guarantee made this 31st day of March, 1985 by Georgia-Pacific Corporation, a business corporation organized under the laws of the State of Georgia, herein referred to as Guarantor, to the Ohio Environmental Protection Agency, Obligee, on behalf of our subsidiary Georgia-Pacific Plastics, Inc. of 133 Peachtree Street, N.E., Atlanta, Georgia 30303.

Recitals

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in paragraph (F) of rule 3745-55-43 and 3745-55-45 of the Administrative Code or paragraph (E) of Rule 3745-66-43 and 3745-66-45 of the Administrative Code.

2. Georgia-Pacific Plastics, Inc. owns or operates the following hazardous waste management facility covered by this guarantee:

Permit Numbers	Facility Location	Closure Costs	Post-Closure Costs
EPA OHD000721480 Ohio 02-43-0258	Georgia-Pacific Plastics, Inc. 786 Hardy Road Painesville, OH 44077	$27,040	N/A

3. "Closure plans" and "post-closure plans" as used below refer to the plans maintained as required by Chapters 3745-55 and 3745-66 of the Administrative Code for the closure and post-closure care of facilities as identified above.

4. For value received from Georgia-Pacific Plastics, Inc. Guarantor guarantees to EPA that in the event that Georgia-Pacific Plastics, Inc. fails to perform closure and post-closure care of the above facility in accordance with the closure or post-closure plans and other permit or interim status requirements whenever required to do so, the Guarantor shall do so or establish a trust fund as specified in Chapters 3745-55 and 3745-66 of the Administrative Code, as applicable, in the name of Georgia-Pacific Plastics, Inc. in the amount of the current closure or post-closure cost estimates as specified in Chapters 3745-55 and 3745-66 of the Administrative Code.

5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the Guarantor fails to

meet the financial test criteria, Guarantor shall send within ninety days, by certified mail, notice to the Director, Ohio EPA and to Georgia-Pacific Plastics, Inc. that he intends to provide alternate financial assurance as specified in Chapters 3745-55 and 3745-66 of the Administrative Code, as applicable, in the name of Georgia-Pacific Plastics, Inc. Within one hundred twenty days after the end of such fiscal year, the Guarantor shall establish such financial assurance unless Georgia-Pacific Plastics, Inc. has done so.

6. The Guarantor agrees to notify the Director by certified mail, of a voluntary or involuntary proceeding under "Title 11 (Bankruptcy)," U.S. Code, naming Guarantor as debtor, within ten days after commencement of the proceeding.

7. Guarantor agrees that within thirty days after being notified by the director of a determination that Guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in Chapters 3745-55 and 3745-66 of the Administrative Code, as applicable, in the name of Georgia-Pacific Plastics, Inc. unless Georgia-Pacific Plastics, Inc. has done so.

8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following:

Amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure, or any other modification or alteration of an obligation of the owner or operator pursuant to Chapters 3745-55 and 3745-66 of the Administrative Code.

9. Guarantor agrees to remain bound under this guarantee for so long as Georgia-Pacific Plastics, Inc. must comply with the applicable financial assurance requirements of Chapters 3745-55 and 3745-66 of the Administrative Code for the above-listed facilities, except that Guarantor may cancel this guarantee by sending notice by certified mail to the Director and to Georgia-Pacific Plastics, Inc., such cancellation to become effective no earlier than one hundred twenty days after receipt of such notice by both Ohio EPA and Georgia-Pacific Plastics, Inc. as evidenced by the return receipts.

10. Guarantor agrees that if Georgia-Pacific Plastics, Inc. fails to provide alternate financial assurance as specified in Chapters 3745-55 and 3745-66 of the Administrative Code, as applicable, and obtain written approval of such assurance from the Director within ninety days after a notice of cancellation by the

Guarantor is received by the Director from the Guarantor, Guarantor shall provide such alternate financial assurance in the name of Georgia-Pacific Plastics, Inc.

11. Guarantor expressly waives notice of acceptance of this guarantee by the Ohio EPA or by Georgia-Pacific Plastics, Inc. Guarantor also expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments or modifications of the facility permit.

I hereby certify that the wording of this guarantee is identical to the wording specified in Paragraph (H) of Rule 3745-55-51 of the Administrative Code as such regulations were constituted on the date first above written.

Effective date: March 31, 1985

Georgia-Pacific Corporation

James C. Van Meter
Executive Vice President - Finance

RAH

Rebecca H. Young
Signature of Witness or Notary

HAZARDOUS WASTE FACILITY

CERTIFICATE OF LIABILITY INSURANCE

1. National Union Fire Insurance Co. (the "Insurer") of Pittsburgh, PA hereby certifies that it has issued liability insurance covering bodily injury and property damage to GEORGIA-PACIFIC PLASTICS, INC., (the "Insured"), of 133 Peachtree Street, N.E., Atlanta, Georgia 30303 in connection with the insured's obligation to demonstrate financial responsibility under Rule 3745-55-47 of the Administrative Code. The coverage applies at EPA Identification Number OHD000721480, Georgia-Pacific Plastics, Inc., 786 Hardy Road, Painesville, Ohio 44077, Ohio Permit Number 02-43-0258, for sudden accidental occurrences. The limits of liability are one million dollars per each occurrence and two million dollars per annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number GLA1940357RA, issued on 4/1/85. The effective date of said policy is 4/1/85-4/1/86.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in Paragraph (F) of Rule 3745-66-47 of the Administrative Code.

(c) Whenever requested by The Director of the Ohio Environmental Protection Agency, the Insurer agrees to furnish to the Director a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty days after a copy of such written notice is received by the Director.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty days after a copy of such written notice is received by the Director.

I hereby certify that the wording of this instrument is identical to the wording specified in Paragraph (J) of Rule 3745-55-51 of the Administrative Code as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Signature of Authorized Representative of Insurer

Bradley N. Tennant
Typed Name

Special Accounts Manager, Authorized Representative
Title

of National Union Fire Insurance Co.
Name of Insurer

National Union Insurance Companies
Address of Representative
270 Carpenter Dr., Atlanta, GA 30328

ARTHUR ANDERSEN & CO.

ATLANTA, GEORGIA

March 31, 1985

To Georgia-Pacific Corporation:

We have examined the balance sheet of Georgia-Pacific Corporation and subsidiaries as of December 31, 1984, and the related statements of income, common shareholders' equity and changes in financial position for the year then ended, and have expressed an unqualified opinion on those statements in our report dated February 15, 1985. We have not performed any auditing procedures since that date. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request, we have read the letter dated March 31, 1985, from your Chief Financial Officer to the U.S. Environmental Protection Agency to demonstrate both liability coverage and assurance of closure care required by Subpart H of 40 CFR Parts 264 and 265. As further required by 40 CFR 264.147(f)(3)(iii) and 265.147(f)(3)(iii), we have compared the data which the letter from the Chief Financial Officer specifies as having been derived from the independently audited financial statements as of and for the year ended December 31, 1984, referred to above, with the corresponding amounts in such financial statements. In connection with this procedure, no matters came to our attention which caused us to believe that the specific data should be adjusted.

This report relates only to the data specified above and does not extend to the financial statements of Georgia-Pacific Corporation and subsidiaries, taken as a whole, for the year ended December 31, 1984. It is furnished solely for the use of Georgia-Pacific Corporation for distribution to the U.S. Environmental Protection Agency and is not to be used for any other purpose.

Arthur Andersen & Co.

LETTER FROM CHIEF FINANCIAL OFFICER

(To demonstrate liability coverage and/or to demonstrate both liability coverage and assurance of closure and/or post-closure care.)

Director
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Dear Sir or Madam:

I am the chief financial officer of Georgia-Pacific Corporation, 133 Peachtree St., N.E., Atlanta, Georgia 30303 (1).

This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care (2) as specified in Subpart H of 40 CFR Parts 264 and 265 and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265 and/or tests equivalent or substantially equivalent, and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725:

USEPA I.D. No. ILD049816432

Name Georgia-Pacific Corporation (3)

Address No. 1 Label Lane, Lockport, Illinois 60441

Please attach a separate page if more space is needed for all facilities.

See Instruction (4)

1. This firm is the owner or operator of the following facilities for which financial assurance for closure and/or post-closure care is demonstrated through the financial test specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE FINANCIAL TEST)

USEPA I.D. No. ILD049816432 (5)	Closure Amount (6)	Post-Closure Amount (7)	Closure and Post-Closure Amounts (8)
Name Georgia-Pacific Corporation			
Address No. 1 Label Lane			$5,720
City Lockport, Illinois 60441			
USEPA I.D. No.			
Name			
Address			
City			

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111 1/2, Section 21(f). Disclosure of this information is required. Failure to do so may result in a civil penalty not to exceed $25,000 per day of violation. Falsification of this information may constitute a Class 4 felony, which also carries a fine of up to $25,000 per day of violation for the first offense. This form has been approved by the Forms Management Center.

Please attach a separate page if more space is needed for all facilities.

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 35 Ill. Adm. Code Parts Parts 724 and 725, the closure and/or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for closure and/or post-closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE CORPORATE GUARANTEE)

	Closure Amount (6)	Post-Closure Amount (7)	Closure and Post-Closure Amounts (8)
USEPA I.D. No. None (5)			
Name			
Address			
City			
USEPA I.D. No.			
Name			
Address			
City			

Please attach a separate page if more space is needed for all facilities.

3. For states other than Illinois this owner or operator or guarantor is demonstrating financial assurance for the closure or post-closure care of the following facility through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: (LIST ALL FACILITIES WHICH ARE NOT IN ILLINOIS BUT ARE SUBJECT TO A STATE OR FEDERAL FINANCIAL ASSURANCE REQUIREMENT THAT ARE ASSURED BY A FINANCIAL TEST OR CORPORATE GUARANTEE)

	Closure Amount (6)	Post-Closure Amount (7)	Closure and Post-Closure Amounts (8)
USEPA I.D. No. See Attachment A (5)			
Name			
Address			
City			
USEPA I.D. No.			
Name			
Address			
City			

Please attach a separate page if more space is needed for all facilities.

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is *NOT* demonstrated either to IEPA, USEPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: (LIST FACILITIES IN RCRA AUTHORIZED STATES WHERE THERE IS NO STATE FINANCIAL ASSURANCE REQUIREMENT)

	Closure Amount (6)	Post-Closure Amount (7)	Closure and Post-Closure Amounts (8)
USEPA I.D. No. None (5)			
Name			
Address			
City			

USEPA I.D. No. _____

Name _____

Address _____ _____

City _____

Please attach a separate page if more space is needed for all facilities.

This owner or operator is required (9) to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31 (10) *. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1984 (11).

Part A. Liability Coverage for Accidental Occ nces (See Instruction 12 and (13)

Alternative I

1. Amount of annual aggregate liability coverage to be demonstrated ..... $_____
2. Current assets ..... $_____
*3. Current liabilities ..... $_____
4. Net working capital (line 2 minus line 3) ..... $_____
*5. Tangible net worth ..... $_____
*6. If less than 90% of assets are located in the U.S., give total U.S. assets ..... $_____

		Yes	No
7.	Is line 5 at least $10 million?	_____	_____
8.	Is line 4 at least 6 times line 1?	_____	_____
9.	Is line 5 at least 6 times line 1?	_____	_____
*10.	Are at least 90% of assets located in the U.S.? If not, complete line 11.	_____	_____
11.	Is line 6 at least 6 times line 1?	_____	_____

Signature _____

Typed name _____

Title _____

Date _____

Part A. Liability Coverage for Accidental Occurrences (See Instruction 12 and (13)

Alternative II

1. Amount of annual aggregate liability coverage to be demonstrated ..... $_____
2. Current bond rating of most recent issuance and name of rating service ..... _____
3. Date of issuance of bond ..... _____
4. Date of maturity of bond ..... _____
*5. Tangible net worth ..... $_____
*6. Total assets in U.S. (required only if less than 90% of assets are located in U.S.) ..... $_____

		Yes	No
7.	Is line 5 at least $10 million?	_____	_____
8.	Is line 5 at least 6 times line 1?	_____	_____
*9.	Are at least 90% of assets located in the U.S.? If not, complete line 10.	_____	_____
10.	Is line 6 at least 6 times line 1?	_____	_____

Signature _____

Typed name _____

Title _____

Date _____

Part B. Closure or Post-Closure Care and Liability Coverage (See Instructions 14 and 15)

Alternative II

1. Sum or current closure and post-closure cost estimates (total of all cost estimates listed above) $ 780,818.00

2. Amount of annual aggregate liability coverage to be demonstrated $1,000,000.00 each occurrence for sudden accidental; $2,000,000.00 aggregate for sudden accidental; $3,000,000.00 each occurrence for nonsuddenaccidental $6,000,000.00 *aggregate for nonsudden accidental

3. Sum of lines 1 and 2 * $ $8,780,818.00

4. Current bond rating of most recent issuance and name of rating service ~~A2, Moody~~

5. Date of issuance of bond 12-1-84

6. Date of maturity of bond 12-1-2014

*7. Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line) $ 2.225 Billion

*8. Total assets in the U.S. (required only is less than 90% of assets are located in the U.S.) $ N/A

	Yes	No
9. Is line 7 at least $10 million?	X	
10. Is line 7 at least 6 times line 3?	X	
*11. Are at least 90% of assets located in the U.S.? If not, complete line 12.	X	
12. Is line 8 at least 6 times line 3?	N/A	

Signature [signature] RAH

Typed name James C. Van Meter

Title Executive Vice President - Finance

Date March 31, 1985

Part B. Closure or Post-Closure Care and Lia. .y Coverage (See Instructions 14 and 15)

Alternative I

1. Sum of current closure and post-closure cost estimates (total of *all* cost estimates listed above) $_____

2. Amount of annual aggregate liability coverage to be demonstrated ..... $_____

3. Sum of lines 1 and 2 ..... $_____

*4. Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6) ..... $_____

*5. Tangible net worth ..... $_____

*6. Net worth ..... $_____

*7. Current assets ..... $_____

*8. Current liabilities ..... $_____

9. Net working capital (line 7 minus line 8) ..... $_____

*10. The sum of net income plus depreciation, depletion, and amortization ..... $_____

*11. Total assets in U.S. (required only if less than 90% of assets are located in the U.S.) ..... $_____

		Yes	No
12.	Is line 5 at least $10 million?	_____	_____
13.	Is line 5 at least 6 times line 3?	_____	_____
14.	Is line 9 at least 6 times line 3?	_____	_____
*15.	Are at least 90% of assets located in the U.S.? If not, complete line 16.	_____	_____
16.	Is line 11 at least 6 times line 3?	_____	_____
17.	Is line 4 divided by line 6 less than 2.0?	_____	_____
18.	Is line 10 divided by line 4 greater than 0.1?	_____	_____
19.	Is line 7 divided by line 8 greater than 1.5?	_____	_____

Signature _____

Typed name _____

Title _____

Date _____

ATTACHMENT 1

Georgia-Pacific Corporation owns or operates the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE AND POST-CLOSURE COSTS
REGION IV		
SCD991289695	Georgia-Pacific Corporation P. O. Box 6347 Spartanburg, South Carolina 29304	11,440
REGION V		
ILD049816432	Georgia-Pacific Corporation No. 1 Label Lane Lockport, Illinois 60441	5,720
MID042441022	Georgia-Pacific Corporation Paper Division P. O. Box 2738 Kalamazoo, Michigan 49003	3,432
REGION VI		
ARD006345403	Georgia-Pacific Corporation 205 Michigan Street Box 7086 Pine Bluff, Arkansas 71601	3,432
OKD007217425	Georgia-Pacific Corporation Route 69-A P. O. Box 578 Pryor, Oklahoma 74361	6,864
TXD008836081	Georgia-Pacific Corporation Bellingham Division 10120 Hirsch Road Houston, TX 77016	11,440
REGION IX		
CAD085393080	Georgia-Pacific Corporation Chem-Pac Operations 2501 Malt Avenue City of Commerce, California 90040	45,760

CAD009380890	Georgia-Pacific Corporation Chem-Pac Operations 760 South Vail P. O. Box 22046 Montebello, California 90040	57,200
CAD089184097	Georgia-Pacific Corporation 90 W. Redwood Avenue Fort Bragg, California 95437	3,432
CAD096233564	Georgia-Pacific Corporation 75 W. Valpico Road P. O. Box 239 Tracy, California 95376	57,096

REGION X

ORD009411505	Georgia-Pacific Corporation P. O. Box 580 Toledo, Oregon	5,720
WAD057311334	Georgia-Pacific Corporation Chem-Pac Operations 111 3rd Street, N.W. Auburn, Washington 98002	9,048
WAD009252297	Georgia-Pacific Corporation 300 Laurel Street P. O. Box 1236 Bellingham, Washington 98227	217,000
WAD050175918	Georgia-Pacific Corporation 1203 Fones Road P. O. Box 547 Olympia, Washington 98507	11,100

Georgia-Pacific Corporation

Law Department

133 Peachtree Street, N.E.
P. O. Box 105605
Atlanta, Georgia 30348
Telephone (404) 521-4846

Richard A. Horder
Associate General Counsel

March 29, 1985

Department of Natural Resources
Office of Hazardous Waste Management
P.O. Box 30028
Lansing, MI 48909

RE: Georgia-Pacific Corporation Financial Responsibility Requirements for Georgia-Pacific Corporation - Kalamazoo, Michigan

Dear Sir:

Pursuant to the regulations of the Michigan Department of Natural Resources concerning the financial assurance requirements for facilities and/or subsidiaries which treat, store or dispose of hazardous wastes, enclosed are the following documents:

1. Letter from Chief Financial Officer;
2. Corporate Guarantee; (if subsidiary involved)
3. Certificate of Liability Insurance; (if subsidiary involved)
4. Special report from our independent, certified accountant; and
5. 1984 Annual Report.

Please note the following plants have been deleted from last year's report because they were sold:

- Newark, NJ
- St. Genevieve, MO
- St. Louis, MO
- Plaquemine, LA
- Piscataway, NJ
- Pasadena, TX

Also, the following facilities are no longer TSD facilities; therefore, they have been deleted from the report:

- Hamlet, N.C.
- Phoenix, AZ

In the case of the following plants, the costs of closure and post closure has been revised over and above that due solely to the implicit price deflator because of changes in the base estimate:

- Bellingham, WA
- Olympia, WA
- Farmingdale, NY
- Columbus, OH
- Albany, OR

If you require further information or assistance, please do not hesitate to contact me.

Very truly yours,

Richard A. Horder

Richard A. Horder

Enclosures (5)

cc: Region V Administrator

bcc: Plant Manager(s)
G. F. McCaig
J. C. Van Meter

ORT420010019	Georgia-Pacific Resins, Inc. P. O. Box 9 Coos Bay, Oregon 97420	48,048

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE AND POST-CLOSURE COSTS
ARKANSAS		
ARD006345403	Georgia-Pacific Corporation 205 Michigan Street Box 7086 Pine Bluff, Arkansas 71601	3,432
CALIFORNIA		
CAD085393080	Georgia-Pacific Corporation Chem-Pac Operations 2501 Malt Avenue City of Commerce, California 90040	45,760
CAD009380890	Georgia-Pacific Corporation Chem-Pac Operations 760 South Vail P. O. Box 22046 Montebello, California 90040	57,200
CAD089184097	Georgia-Pacific Corporation 90 W. Redwood Avenue Fort Bragg, California 95437	3,432
CAD096233564	Georgia-Pacific Corporation 75 W. Valpico Road P. O. Box 239 Tracy, California 95376	57,096

ILLINOIS

ILD049816432	Georgia-Pacific Corporation No. 1 Label Lane Lockport, Illinois 60441	5,720

OKLAHOMA

OKD007217425	Georgia-Pacific Corporation Route 69-A P. O. Box 578 Pryor, Oklahoma 74361	6,864

OREGON

ORD009411505	Georgia-Pacific Corporation P. O. Box 580 Toledo, Oregon	5,720

SOUTH CAROLINA

SCD991289695	Georgia-Pacific Corporation P. O. Box 6347 Spartanburg, South Carolina 29304	11,440

TEXAS

TXD08836081	Georgia-Pacific Corporation Bellingham Division Houston Chemical Plant 10120 Hirsch Road Houston, Texas 77016	11,440

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: NONE.

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1984.

ALTERNATIVE II

1.	Sum or current closure and post-closure cost estimates (total of all cost estimates listed above)	$ 780,818.00
2.	Amount of annual aggregate liability coverage to be demonstrated	$ 1,000,000.00 each occurrence for sudden accidental $ 2,000,000.00 aggregate for sudden accidental $ 3,000,000.00 each occurrence for nonsudden accidental $ 6,000,000.00 aggregate for nonsudden accidental
3.	Sum of lines 1 and 2	$ 8,780,818.00
4.	Current bond rating of most recent issuance and name of rating service	A2, Moody
5.	Date of issuance of bond	12-1-84
6.	Date of maturity of bond	12-1-2014
*7.	Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	2.225 Billion
*8.	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	N/A

		YES	NO
9.	Is line 7 at least $10 million?	x	
10.	Is line 7 at least 6 times line 3?	x	
*11.	Are at least 90% of assets located in the U.S.? If not, complete line 12	x	

12. Is line 8 at least 6 times line 3? N/A

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

James C. Van Meter
Executive Vice President - Finance

Date: March 31, 1985

ARTHUR ANDERSEN & CO.

ATLANTA, GEORGIA

March 31, 1985

To Georgia-Pacific Corporation:

We have examined the balance sheet of Georgia-Pacific Corporation and subsidiaries as of December 31, 1984, and the related statements of income, common shareholders' equity and changes in financial position for the year then ended, and have expressed an unqualified opinion on those statements in our report dated February 15, 1985. We have not performed any auditing procedures since that date. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request, we have read the letter dated March 31, 1985, from your Chief Financial Officer to the U.S. Environmental Protection Agency to demonstrate both liability coverage and assurance of closure care required by Subpart H of 40 CFR Parts 264 and 265. As further required by 40 CFR 264.147(f)(3)(iii) and 265.147(f)(3)(iii), we have compared the data which the letter from the Chief Financial Officer specifies as having been derived from the independently audited financial statements as of and for the year ended December 31, 1984, referred to above, with the corresponding amounts in such financial statements. In connection with this procedure, no matters came to our attention which caused us to believe that the specific data should be adjusted.

This report relates only to the data specified above and does not extend to the financial statements of Georgia-Pacific Corporation and subsidiaries, taken as a whole, for the year ended December 31, 1984. It is furnished solely for the use of Georgia-Pacific Corporation for distribution to the U.S. Environmental Protection Agency and is not to be used for any other purpose.

Arthur Andersen & Co.

REGION V

MID042441022	Georgia-Pacific Corporation Paper Division P. O. Box 2738 Kalamazoo, Michigan 49003	3,300
OHD054026679	Georgia-Pacific Corporation 1975 Watkins Road Columbus, Ohio 43207	31,800
OHD000721480	Georgia-Pacific Corporation 786 Hardy Road Painesville, Ohio 44077	26,000

REGION VII

MOD092351642	Georgia-Pacific Corporation 40 Merchant Street St. Genevieve, Missouri 63670	3,300
MOD046376398	Georgia-Pacific Corporation 3810 Paule Avenue St. Louis, Missouri 63125	3,300

REGION X

WAD057311334	Georgia-Pacific Corporation Chem-Pac Operations 111 3rd Street, N.W. Auburn, Washington 98002	8,700
WAD009252297	Georgia-Pacific Corporation 300 Laurel Street P. O. Box 1236 Bellingham, Washington 98227	137,300
WAD050175918	Georgia-Pacific Corporation 1203 Fones Road P. O. Box 547 Olympia, Washington 98507	6,600
WAD009248774	Georgia-Pacific Corporation Resin Division 1754 Thorne Road Tacoma, Washington 98421	26,000

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following

facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: NONE.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE AND POST-CLOSURE COSTS
ARIZONA		
AZD080664881	Georgia-Pacific Corporation 4239 N. 39th Avenue P. O. Box 14528 Phoenix, Arizona 85019	3,300
ARKANSAS		
ART060010048	Georgia-Pacific Corporation Resin Division P. O. Box 520 Crossett, Arkansas 71635	54,900
ARD006345403	Georgia-Pacific Corporation 205 Michigan Street Box 7086 Pine Bluff, Arkansas 71601	3,300
CALIFORNIA		
CAD085393080	Georgia-Pacific Corporation Chem-Pac Operations 2501 Malt Avenue City of Commerce, California 90040	44,000
CAD009380890	Georgia-Pacific Corporation Chem-Pac Operations 760 South Vail P. O. Box 22046 Montebello, California 90040	55,000
CAD089184097	Georgia-Pacific Corporation 90 W. Redwood Avenue Fort Bragg, California 95437	3,300

CAD096233564	Georgia-Pacific Corporation 75 W. Valpico Road P. O. Box 239 Tracy, California 95376	54,900
CAT000624296	Georgia-Pacific Corporation 2163 N. State Street Ukiah, California 95482	27,466
GEORGIA		
GAD093697233	Georgia-Pacific Corporation 2883 Miller Road Decatur, Georgia 30035	2,200
GAD990741332	Georgia-Pacific Corporation P. O. Box 267 Savannah, Georgia 31498	5,500
ILLINOIS		
ILD049816432	Georgia-Pacific Corporation No. 1 Label Lane Lockport, Illinois 60441	5,500
LOUISIANA		
LAD057117434	Georgia-Pacific Corporation Chemical Division P. O. Box 629 Plaquemine, Louisiana 70764	Closure 5,456,150 Contingent Closure Cost 8,101,500 Contingent Post- Closure Cost 13,898,760
NORTH CAROLINA		
NCD00616219	Georgia-Pacific Corporation Hamlet Multiwall Plant P. O. Box 1149 Hamlet, North Carolina 28345	2,200
OKLAHOMA		
OKD007217425	Georgia-Pacific Corporation Route 69-A P. O. Box 578 Pryor, Oklahoma 74361	6,600

OREGON

ORD000405233	Georgia-Pacific Corporation Resin Division P. O. Box 1068 Albany, Oregon 97321	8,700
ORT420010019	Georgia-Pacific Corporation Resin Division P. O. Box 9 Coos Bay, Oregon 97420	46,200
ORD009411505	Georgia-Pacific Corporation P. O. Box 580 Toledo, Oregon	5,500

SOUTH CAROLINA

SCD991289695	Georgia-Pacific Corporation P. O. Box 6347 Spartanburg, South Carolina 29304	11,000

TEXAS

TXD08836081	Georgia-Pacific Corporation Bellingham Division Houston Chemical Plant 10120 Hirsch Road Houston, Texas 77016	11,000
TXD093565653	Georgia-Pacific Corporation Houston Cumene Plant 3503 Pasadena Freeway P. O. Box 1959 Pasadena, Texas 77501	38,500
TXD074160391	Georgia-Pacific Corporation 1429 East Lufkin P. O. Box 938 Lufkin, Texas 75901	22,000

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: NONE.

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1983.

ALTERNATIVE II

1.	Sum or current closure and post-closure cost estimates (total of all cost estimates listed above)	$ 28,168,676.00
2.	Amount of annual aggregate liability coverage to be demonstrated	$ 1,000,000.00 each occurrence for sudden accidental $ 2,000,000.00 aggregate for sudden accidental $ 3,000,000.00 each occurrence for nonsudden accidental $ 6,000,000.00 aggregate for nonsudden accidental
3.	Sum of lines 1 and 2	$ 36,168,676.00
4.	Current bond rating of most recent issuance and name of rating service	A2, Moody
5.	Date of issuance of bond	2-1-82
6.	Date of maturity of bond	2-1-97
*7.	Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	$ 2.218 Billion
*8.	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	N/A

	YES	NO
9. Is line 7 at least $10 million?	x	
10. Is line 7 at least 6 times line 3?	x	
*11. Are at least 90% of assets located in the U.S.? If not, complete line 12	x	
12. Is line 8 at least 6 times line 3?	N/A	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

James C. Van Meter
Executive Vice President - Finance

Date: March 28, 1984

Tom Gulz

Georgia-Pacific Corporation

Law Department

133 Peachtree Street, N.E.
P. O. Box 105605
Atlanta, Georgia 30348
Telephone (404) 521-4810

Beverly V. Gholson
Senior Counsel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

March 31, 1984

MID 042441022
OHD-054026679 Part B

Regional Administrator
Region V, Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

RE: GEORGIA-PACIFIC CORPORATION, EPA FINANCIAL RESPONSIBILITY REQUIREMENTS

Dear Sir or Madam:

Pursuant to 40 CFR Section 265 concerning the financial assurance requirements of facilities which treat, store or dispose of hazardous waste, Georgia-Pacific Corporation hereby submits the attached letter to demonstrate both liability coverage and assurance of closure or post-closure care. As required by the regulations, this letter provides the financial strength information and the updated closure costs for fiscal year 1983. Also, I have included a copy of Georgia-Pacific's 1983 Annual Report and a special report from our independent certified public accountant.

If you have any questions or need further information, please contact me.

Very truly yours,

Beverly V. Gholson

Beverly V. Gholson

BVG/dlc

cc: Plant Managers:

Lockport, IL
Taylorville, IL
Gary, IN
Kalamazoo, MI
Cincinnati, OH
Columbus, OH
Painesville, OH

Environmental Protection Agency - Michigan

RECEIVED
APR 03 1984
WASTE MANAGEMENT BRANCH

ARTHUR ANDERSEN & CO.

133 PEACHTREE STREET, N.E.
ATLANTA, GEORGIA 30303
(404) 658-1776

March 31, 1984

To Georgia-Pacific Corporation:

We have examined the balance sheet of Georgia-Pacific Corporation and subsidiaries as of December 31, 1983, and the related statements of income, common shareholders' equity and changes in financial position for the year then ended, and have expressed an unqualified opinion on those statements in our report dated February 10, 1984. We have not performed any auditing procedures since that date. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request, we have read the letter dated March 31, 1984, from your Chief Financial Officer to the U.S. Environmental Protection Agency to demonstrate both liability coverage and assurance of closure care required by Subpart H of 40 CFR Parts 264 and 265. As further required by 40 CFR 264.147(f)(3)(iii) and 265.147(f)(3)(iii), we have compared the data which the letter from the Chief Financial Officer specifies as having been derived from the independently audited financial statements as of and for the year ended December 31, 1983, referred to above with the corresponding amounts in such financial statements. In connection with this procedure, no matters came to our attention which caused us to believe that the specific data should be adjusted.

This report relates only to the data specified above and does not extend to the financial statements of Georgia-Pacific Corporation and subsidiaries, taken as a whole, for the year ended December 31, 1983. It is furnished solely for the use of Georgia-Pacific Corporation for distribution to the U.S. Environmental Protection Agency and is not to be used for any other purpose.

Arthur Andersen & Co.

Georgia-Pacific Corporation 133 Peachtree Street, N.E.
P.O. Box 105605
Atlanta, Georgia 30348
Telephone (404) 521-4000

March 31, 1984

Letter from Chief Financial Officer to demonstrate both liability coverage and assurance of closure or post-closure care.

Regional Administrator
Region V, Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

Dear Sirs:

I am the chief financial officer of Georgia-Pacific Corporation, 133 Peachtree Street, Atlanta, Georgia 30303. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

EPA I.D. NO.	FACILITY LOCATION
REGION II	
NJD062036892	Georgia-Pacific Corporation 290 Ferry Street Newark, New Jersey 07105
NJD980654032	Georgia-Pacific Corporation 100 Normandy Drive Piscataway, New Jersey 08805
NYD047663505	Georgia-Pacific Corporation 100-120 Adams Boulevard P. O. Box 250 Farmingdale, New York 11735
REGION IV	
GAD093697233	Georgia-Pacific Corporation 2883 Miller Road Decatur, Georgia 30035
GAD990741332	Georgia-Pacific Corporation P. O. Box 267 Savannah, Georgia 31498
NCD00616219	Georgia-Pacific Corporation Hamlet Multiwall Plant P. O. Box 1149 Hamlet, North Carolina 28345

SCD991289695	Georgia-Pacific Corporation P. O. Box 6347 Spartanburg, South Carolina 29304

REGION V

ILD049816432	Georgia-Pacific Corporation No. 1 Label Lane Lockport, Illinois 60441
MID042441022	Georgia-Pacific Corporation Paper Division P. O. Box 2738 Kalamazoo, Michigan 49003
OHD054026679	Georgia-Pacific Corporation 1975 Watkins Road Columbus, Ohio 43207
OHD000721480	Georgia-Pacific Corporation 786 Hardy Road Painesville, Ohio 44077

REGION VI

ART060010048	Georgia-Pacific Corporation Resin Division P. O. Box 520 Crossett, Arkansas 71635
ARD006345403	Georgia-Pacific Corporation 205 Michigan Street Box 7086 Pine Bluff, Arkansas 71601
LAD057117434	Georgia-Pacific Corporation Chemical Division P. O. Box 629 Plaquemine, Louisiana 70764
OKD007217425	Georgia-Pacific Corporation Route 69-A P. O. Box 578 Pryor, Oklahoma 74361
TXD08836081	Georgia-Pacific Corporation Bellingham Division Houston Chemical Plant 10120 Hirsch Road Houston, Texas 77016

TXD093565653	Georgia-Pacific Corporation Houston Cumene Plant 3503 Pasadena Freeway P. O. Box 1959 Pasadena, Texas 77501
TXD074160391	Georgia-Pacific Corporation 1429 East Lufkin P. O. Box 938 Lufkin, Texas 75901

REGION VII

MOD092351642	Georgia-Pacific Corporation 40 Merchant Street St. Genevieve, Missouri 63670
MOD046376398	Georgia-Pacific Corporation 3810 Paule Avenue St. Louis, Missouri 63125

REGION IX

AZD080664881	Georgia-Pacific Corporation 4239 N. 39th Avenue P. O. Box 14528 Phoenix, Arizona 85019
CAD085393080	Georgia-Pacific Corporation Chem-Pac Operations 2501 Malt Avenue City of Commerce, California 90040
CAD009380890	Georgia-Pacific Corporation Chem-Pac Operations 760 South Vail P. O. Box 22046 Montebello, California 90040
CAD089184097	Georgia-Pacific Corporation 90 W. Redwood Avenue Fort Bragg, California 95437
CAD096233564	Georgia-Pacific Corporation 75 W. Valpico Road P. O. Box 239 Tracy, California 95376
CAT000624296	Georgia-Pacific Corporation 2163 N. State Street Ukiah, California 95482

REGION X

ORD000405233	Georgia-Pacific Corporation Resin Division P. O. Box 1068 Albany, Oregon 97321
ORT420010019	Georgia-Pacific Corporation Resin Division P. O. Box 9 Coos Bay, Oregon 97420
ORD009411505	Georgia-Pacific Corporation P. O. Box 580 Toledo, Oregon
WAD057311334	Georgia-Pacific Corporation Chem-Pac Operations 111 3rd Street, N.W. Auburn, Washington 98002
WAD009252297	Georgia-Pacific Corporation 300 Laurel Street P. O. Box 1236 Bellingham, Washington 98227
WAD050175918	Georgia-Pacific Corporation 1203 Fones Road P. O. Box 547 Olympia, Washington 98507
WAD009248774	Georgia-Pacific Corporation Resin Division 1754 Thorne Road Tacoma, WA 98421

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE AND POST-CLOSURE COSTS
REGION II		
NYD047663505	Georgia-Pacific Corporation 100-120 Adams Boulevard P. O. Box 250 Farmingdale, New York 11735	54,900

Georgia-Pacific Corporation
2310 Parklake Drive, N. E.
P.O. Box 105041
Atlanta, Georgia 30348
Telephone (404) 491-1244

Letter from Chief Financial Officer to demonstrate both liability coverage and assurance of closure or post-closure care.

Regional Administrator
Region I, Environmental Protection Agency
Room 2203
John F. Kennedy Federal Building
Boston, Mass. 02203

Regional Administrator
Region II, Environmental Protection Agency
Room 1009, 26 Federal Plaza
New York, N.Y. 10007

Regional Administrator
Region III, Environmental Protection Agency
Curtis Building
Sixth and Walnut Street
Philadelphia, PA 19106

Regional Administrator
Region IV, Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, GA 30308

Regional Administrator
Region V, Environmental Protection Agency
230 South Dearborn Street
Chicago, Ill. 60604

Regional Administrator
Region VI, Environmental Protection Agency
First International Building
1201 Elm Street
Dallas, TX 75270

Regional Administrator
Region VII, Environmental Protection Agency
324 E. 11th Street
Kansas City, MO 64106

Regional Administrator
Region IX, Environmental Protection Agency
215 Fremont Street
San Francisco, CA 94105

Regional Administrator
Region X, Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

Dear Sirs:

I am the chief financial officer of Georgia-Pacific Corporation, 900 S.W. Fifth Avenue, Portland, Oregon 97204. (After July 31, 1982, the address will be 133 Peachtree Street, Atlanta, Georgia 30303.) This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

EPA I.D. NO.	PLANT LOCATION
REGION I	
MED07174225	Georgia-Pacific Corporation N.E. Division Woodland, Maine 04694
VTD043516210	Georgia-Pacific Corporation Whiteville Paper Mill Gilman, Vermont 05904
REGION II	
NJD002514750	Georgia-Pacific Corporation Foot of DeRousse Avenue P. O. Box 338 Delair, New Jersey 08110
NJD062036892	Georgia-Pacific Corporation 290 Ferry Street Newark, New Jersey 07105
NJD002444719	Georgia-Pacific Corporation 100 Normandy Drive Piscataway, New Jersey 08805

NYO047663505	Georgia-Pacific Corporation 100-120 Adams Boulevard P. O. Box 250 Farmingdale, New York 11735
NJD054067756	Georgia-Pacific Corporation 17 Forester Avenue P. O. Box 409 Warwick, New York 10090

REGION III

PAD096847835	Georgia-Pacific Corporation P. O. Box 622 Quakertown, Pennsylvania 18951

REGION IV

FLD004056248	Georgia-Pacific Corporation John Campbell Highway 216 P. O. Box 919 Palatka, Florida 32077
GAD093697233	Georgia-Pacific Corporation 2883 Miller Road Decatur, Georgia 30035
GAD000828210	Georgia-Pacific Corporation 100 Georgia-Pacific Way P. O. Box 776 Hampton, Georgia 30228
GAD080100563	Georgia-Pacific Corporation P. O. Box 4188 Port Wentworth, Georgia 31407
GAD990741332	Georgia-Pacific Corporation P. O. Box 267 Savannah, Georgia 31498
GAD049712201	Georgia-Pacific Corporation P. O. Box 396 Vienna, Georgia 31092
MSD000824854	Georgia-Pacific Corporation Highway 15 South P. O. Box 309 Louisville, Mississippi 39339

MSD057481400	Georgia-Pacific Corporation P. O. Box 556 Taylorsville, Mississippi 39168
NCT380010215	Georgia-Pacific Corporation P. O. Box 368 Conway, North Carolina 27820
NCD00616219	Georgia-Pacific Corporation Hamlet Multiwall Plant P. O. Box 1149 Hamlet, North Carolina 28345
SCT460010069	Georgia-Pacific Corporation P. O. Box 147 Russellville, South Carolina 29476
SCD991289695	Georgia-Pacific Corporation P. O. Box 6347 Spartanburg, South Carolina 29304
SCD042634121	Georgia-Pacific Corporation Williams Furniture Division P. O. Drawer 1489 Sumter, South Carolina 29150

REGION V

ILD049816432	Georgia-Pacific Corporation No. 1 Label Lane Lockport, Illinois 60441
ILD005443759	Georgia-Pacific Corporation Elm Street & Hopper Drive P. O. Box 369 Taylorville, Illinois 62568
IND003938800	Georgia-Pacific Corporation Second Place and Waite Street P. O. Box 4326 Gary, Indiana 46404
MID042441022	Georgia-Pacific Corporation Paper Division P. O. Box 2738 Kalamazoo, Michigan 49003
OHD004251930	Georgia-Pacific Corporation 4575 Eastern Avenue Cincinnati, Ohio 45226

OHD054026679	Georgia-Pacific Corporation 1975 Watkins Road Columbus, Ohio 43207
OHD000383638	Georgia-Pacific Corporation 786 Hardy Road Painesville, Ohio 44077

REGION VI

ART060010048	Georgia-Pacific Corporation Crossett Division P. O. Box 520 Crossett, Arkansas 71635
ARD006345403	Georgia-Pacific Corporation 205 Michigan Street Box 7086 Pine Bluff, Arkansas 71601
LAD057117434	Georgia-Pacific Corporation Chemical Division P. O. Box 629 Plaquemine, Louisiana 70764
LAD062643853	Georgia-Pacific Corporation Port Hudson Division P. O. Box 430 Zachary, Louisiana 70791
OKD007217425	Georgia-Pacific Corporation Route 69-A P. O. Box 578 Pryor, Oklahoma 74361
TXD08836081	Georgia-Pacific Corporation Bellingham Division Houston Chemical Plant 10120 Hirsch Road Houston, Texas 77016
TXD093565653	Georgia-Pacific Corporation Houston Cumene Plant 3503 Pasadena Freeway P. O. Box 1959 Houston, Texas 77501
TXD074160391	Georgia-Pacific Corporation 1429 East Lufkin P. O. Box 938 Lufkin, Texas 75901

REGION VII

IAD001807114	Georgia-Pacific Corporation 3355 Agency Street P. O. Box 279 Burlington, Iowa 52602
MOD092351642	Georgia-Pacific Corporation 40 Merchant Street St. Genevieve, Missouri 63670
MOD046376398	Georgia-Pacific Corporation 3810 Paule Avenue St. Louis, Missouri 63125

REGION IX

AZD080664881	Georgia-Pacific Corporation 4239 N. 39th Avenue P. O. Box 14528 Phoenix, Arizona 85019
CAD085393080	Georgia-Pacific Corporation Chem-Pac Operations 2501 Malt Avenue City of Commerce, California 90040
CAD009380890	Georgia-Pacific Corporation Chem-Pac Operations 760 South Vail P. O. Box 22046 City of Commerce, California 90040
CAD089184097	Georgia-Pacific Corporation 90 W. Redwood Avenue Fort Bragg, California 95437
CAD096233564	Georgia-Pacific Corporation 75 W. Valpico Road P. O. Box 239 Tracy, California 95376
CAT000624296	Georgia-Pacific Corporation 2163 N. State Street Ukiah, California 95482

REGION X

ORD000405233	Georgia-Pacific Corporation Resin Division P. O. Box 1068 Albany, Oregon 97321
ORT420010019	Georgia-Pacific Corporation Resin Division P. O. Box 9 Coos Bay, Oregon 97420
ORD009411505	Georgia-Pacific Corporation P. O. Box 580 Toledo, Oregon
WAD057311334	Georgia-Pacific Corporation Chem-Pac Operations 111 3rd Street, N.W. Auburn, Washington 98002
WAD009252297	Georgia-Pacific Corporation 300 Laurel Street P. O. Box 1236 Bellingham, Washington 98227
WAD050175918	Georgia-Pacific Corporation 1203 Fones Road P. O. Box 547 Olympia, Washington 98507

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

EPA I.D. NO.	PLANT LOCATION	CLOSURE COST
REGION I		
MED07174225	Georgia-Pacific Corporation N.E. Division Woodland, Maine 04694	$ 15,000
VTD043516210	Georgia-Pacific Corporation Whiteville Paper Mill Gilman, Vermont 05904	3,000

REGION II

NJDOO2514750	Georgia-Pacific Corporation Foot of DeRousse Avenue P. O. Box 338 Delair, New Jersey 08110	1,000
NJDO62036892	Georgia-Pacific Corporation 290 Ferry Street Newark, New Jersey 07105	11,000
NJDOO2444719	Georgia-Pacific Corporation 100 Normandy Drive Piscataway, New Jersey 08805	20,000
NYOO47663505	Georgia-Pacific Corporation 100-120 Adams Boulevard P. O. Box 250 Farmingdale, New York 11735	50,000
NJDO54067756	Georgia-Pacific Corporation 17 Forester Avenue P. O. Box 409 Warwick, New York 10090	23,000

REGION III

PAD096847835	Georgia-Pacific Corporation P. O. Box 622 Quakertown, Pennsylvania 18951	2,000

REGION IV

FLD004056248	Georgia-Pacific Corporation John Campbell Highway 216 P. O. Box 919 Palatka, Florida 32077	50,000
GAD093697233	Georgia-Pacific Corporation 2883 Miller Road Decatur, Georgia 30035	2,000
GAD000828210	Georgia-Pacific Corporation 100 Georgia-Pacific Way P. O. Box 776 Hampton, Georgia 30228	8,000
GAD080100563	Georgia-Pacific Corporation P. O. Box 4188 Port Wentworth, Georgia 31407	185,000

GAD990741332	Georgia-Pacific Corporation P. O. Box 267 Savannah, Georgia 31498	5,000
GAD049712201	Georgia-Pacific Corporation P. O. Box 396 Vienna, Georgia 31092	25,000
MSD000824854	Georgia-Pacific Corporation Highway 15 South P. O. Box 309 Louisville, Mississippi 39339	10,000
MSD057481400	Georgia-Pacific Corporation P. O. Box 556 Taylorsville, Mississippi 39168	4,000
NCT380010215	Georgia-Pacific Corporation P. O. Box 368 Conway, North Carolina 27820	10,000
NCD00616219	Georgia-Pacific Corporation Hamlet Multiwall Plant P. O. Box 1149 Hamlet, North Carolina 28345	2,000
SCT460010069	Georgia-Pacific Corporation P. O. Box 147 Russellville, South Carolina 29476	10,000
SCD991289695	Georgia-Pacific Corporation P. O. Box 6347 Spartanburg, South Carolina 29304	10,000
SCD042634121	Georgia-Pacific Corporation Williams Furniture Division P. O. Drawer 1489 Sumter, South Carolina 29150	5,000

REGION V

ILD049816432	Georgia-Pacific Corporation No. 1 Label Lane Lockport, Illinois 60441	5,000
ILD005443759	Georgia-Pacific Corporation Elm Street & Hopper Drive P. O. Box 369 Taylorville, Illinois 62568	5,000

IND003938800	Georgia-Pacific Corporation Second Place and Waite Street P. O. Box 4326 Gary, Indiana 46404	10,000
MID042441022	Georgia-Pacific Corporation Paper Division P. O. Box 2738 Kalamazoo, Michigan 49003	3,000
OHD004251930	Georgia-Pacific Corporation 4575 Eastern Avenue Cincinnati, Ohio 45226	16,000
OHD054026679	Georgia-Pacific Corporation 1975 Watkins Road Columbus, Ohio 43207	29,000
OHD000383638	Georgia-Pacific Corporation 786 Hardy Road Painesville, Ohio 44077	5,000
REGION VI		
ART060010048	Georgia-Pacific Corporation Crossett Division P. O. Box 520 Crossett, Arkansas 71635	50,000
ARD006345403	Georgia-Pacific Corporation 205 Michigan Street Box 7086 Pine Bluff, Arkansas 71601	3,000
LAD057117434	Georgia-Pacific Corporation Chemical Division P. O. Box 629 Plaquemine, Louisiana 70764	10,000,000
LAD062643853	Georgia-Pacific Corporation Port Hudson Division P. O. Box 430 Zachary, Louisiana 70791	32,000
OKD007217425	Georgia-Pacific Corporation Route 69-A P. O. Box 578 Pryor, Oklahoma 74361	6,000

TXD08836081	Georgia-Pacific Corporation Bellingham Division Houston Chemical Plant 10120 Hirsch Road Houston, Texas 77016	10,000
TXD093565653	Georgia-Pacific Corporation Houston Cumene Plant 3503 Pasadena Freeway P. O. Box 1959 Houston, Texas 77501	35,000
TXD074160391	Georgia-Pacific Corporation 1429 East Lufkin P. O. Box 938 Lufkin, Texas 75901	20,000
REGION VII		
IAD001807114	Georgia-Pacific Corporation 3355 Agency Street P. O. Box 279 Burlington, Iowa 52602	3,000
MOD092351642	Georgia-Pacific Corporation 40 Merchant Street St. Genevieve, Missouri 63670	3,000
MOD046376398	Georgia-Pacific Corporation 3810 Paule Avenue St. Louis, Missouri 63125	3,000
REGION IX		
AZD080664881	Georgia-Pacific Corporation 4239 N. 39th Avenue P. O. Box 14528 Phoenix, Arizona 85019	3,000
CAD085393080	Georgia-Pacific Corporation Chem-Pac Operations 2501 Malt Avenue City of Commerce, California 90040	40,000
CAD009380890	Georgia-Pacific Corporation Chem-Pac Operations 760 South Vail P. O. Box 22046 City of Commerce, California 90040	50,000

CAD089184097	Georgia-Pacific Corporation 90 W. Redwood Avenue Fort Bragg, California 95437	3,000
CAD096233564	Georgia-Pacific Corporation 75 W. Valpico Road P. O. Box 239 Tracy, California 95376	50,000
CAT000624296	Georgia-Pacific Corporation 2163 N. State Street Ukiah, California 95482	25,000
REGION X		
ORD000405233	Georgia-Pacific Corporation Resin Division P. O. Box 1068 Albany, Oregon 97321	8,000
ORT420010019	Georgia-Pacific Corporation Resin Division P. O. Box 9 Coos Bay, Oregon 97420	42,000
ORD009411505	Georgia-Pacific Corporation P. O. Box 580 Toledo, Oregon	5,000
WAD057311334	Georgia-Pacific Corporation Chem-Pac Operations 111 3rd Street, N.W. Auburn, Washington 98002	8,000
WAD009252297	Georgia-Pacific Corporation 300 Laurel Street P. O. Box 1236 Bellingham, Washington 98227	125,000
WAD050175918	Georgia-Pacific Corporation 1203 Fones Road P. O. Box 547 Olympia, Washington 98507	6,000

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: NONE.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: NONE.

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: NONE.

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31st. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1981.

ALTERNATIVE II

1.	Sum or current closure and post-closure cost estimates (total of all cost estimates listed above)	$ 11,054,000.00
2.	Amount of annual aggregate liability coverage to be demonstrated	$ -0-
3.	Sum of lines 1 and 2	$ 11,054,000.00
4.	Current bond rating of most recent issuance and name of rating service	A1
5.	Date of issuance of bond	6-15-80
6.	Date of maturity of bond	6-15-90
*7.	Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	$ 2.123 Billion

		YES	NO
*8.	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)		N/A
9.	Is line 7 at least $10 million?	x	
10.	Is line 7 at least 6 times line 3?	x	
*11.	Are at least 90% of assets located in the U.S.? If not, complete line 12	x	
12.	Is line 8 at least 6 times line 3?	x	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

Harry J. Kane

Harry J. Kane,
Executive Vice President Finance

Date: June 30, 1982

cc: State Solid Waste Agencies

MID 042 441 022

Georgia-Pacific Corporation *133 Peachtree Street, N.E.*
Atlanta, Georgia 30303
(404) 521-4000

MID 042 441 022
Gus - discard 1981 annual report
TBA 05-24-83

April 1, 1983

Letter from Chief Financial Officer to demonstrate both liability coverage and assurance of closure or post-closure care.

Regional Administrator
Region II, Environmental Protection Agency
Room 1009, 26 Federal Plaza
New York, NY 10007

Regional Administrator
Region V, Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

Regional Administrator
Region VII, Environmental Protection Agency
324 E. 11th Street
Kansas City, MO 64106

Regional Administrator
Region X, Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

Dear Sirs:

I am the chief financial officer of Georgia-Pacific Corporation, 133 Peachtree Street, Atlanta, Georgia 30303. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

EPA I.D. NO.	FACILITY LOCATION
REGION II	
NJD062036892	Georgia-Pacific Corporation 290 Ferry Street Newark, New Jersey 07105
NJD980654032	Georgia-Pacific Corporation 100 Normandy Drive Piscataway, New Jersey 08805
NYD047663505	Georgia-Pacific Corporation 100-120 Adams Boulevard P. O. Box 250 Farmingdale, New York 11735
REGION IV	
GAD093697233	Georgia-Pacific Corporation 2883 Miller Road Decatur, Georgia 30035
GAD990741332	Georgia-Pacific Corporation P. O. Box 267 Savannah, Georgia 31498
NCD00616219	Georgia-Pacific Corporation Hamlet Multiwall Plant P. O. Box 1149 Hamlet, North Carolina 28345

SCD991289695	Georgia-Pacific Corporation P. O. Box 6347 Spartanburg, South Carolina 29304
SCD042634121	Georgia-Pacific Corporation Williams Furniture Division P. O. Drawer 1489 Sumter, South Carolina 29150

REGION V

ILD049816432	Georgia-Pacific Corporation No. 1 Label Lane Lockport, Illinois 60441
MID042441022	Georgia-Pacific Corporation Paper Division P. O. Box 2738 Kalamazoo, Michigan 49003
OHD054026679	Georgia-Pacific Corporation 1975 Watkins Road Columbus, Ohio 43207
OHD000721480	Georgia-Pacific Corporation 786 Hardy Road Painesville, Ohio 44077

REGION VI

ART060010048	Georgia-Pacific Corporation Resin Division P. O. Box 520 Crossett, Arkansas 71635
ARD006345403	Georgia-Pacific Corporation 205 Michigan Street Box 7086 Pine Bluff, Arkansas 71601
LAD057117434	Georgia-Pacific Corporation Chemical Division P. O. Box 629 Plaquemine, Louisiana 70764
OKD007217425	Georgia-Pacific Corporation Route 69-A P. O. Box 578 Pryor, Oklahoma 74361

TXD08836081	Georgia-Pacific Corporation Bellingham Division Houston Chemical Plant 10120 Hirsch Road Houston, Texas 77016
TXD093565653	Georgia-Pacific Corporation Houston Cumene Plant 3503 Pasadena Freeway P. O. Box 1959 Pasadena, Texas 77501
TXD074160391	Georgia-Pacific Corporation 1429 East Lufkin P. O. Box 938 Lufkin, Texas 75901

REGION VII

MOD092351642	Georgia-Pacific Corporation 40 Merchant Street St. Genevieve, Missouri 63670
MOD046376398	Georgia-Pacific Corporation 3810 Paule Avenue St. Louis, Missouri 63125

REGION IX

AZD080664881	Georgia-Pacific Corporation 4239 N. 39th Avenue P. O. Box 14528 Phoenix, Arizona 85019
CAD085393080	Georgia-Pacific Corporation Chem-Pac Operations 2501 Malt Avenue City of Commerce, California 90040
CAD009380890	Georgia-Pacific Corporation Chem-Pac Operations 760 South Vail P. O. Box 22046 Montebello, California 90040
CAD089184097	Georgia-Pacific Corporation 90 W. Redwood Avenue Fort Bragg, California 95437

CAD096233564	Georgia-Pacific Corporation 75 W. Valpico Road P. O. Box 239 Tracy, California 95376
CAT000624296	Georgia-Pacific Corporation 2163 N. State Street Ukiah, California 95482

REGION X

ORD000405233	Georgia-Pacific Corporation Resin Division P. O. Box 1068 Albany, Oregon 97321
ORT420010019	Georgia-Pacific Corporation Resin Division P. O. Box 9 Coos Bay, Oregon 97420
ORD009411505	Georgia-Pacific Corporation P. O. Box 580 Toledo, Oregon
WAD057311334	Georgia-Pacific Corporation Chem-Pac Operations 111 3rd Street, N.W. Auburn, Washington 98002
WAD009252297	Georgia-Pacific Corporation 300 Laurel Street P. O. Box 1236 Bellingham, Washington 98227
WAD050175918	Georgia-Pacific Corporation 1203 Fones Road P. O. Box 547 Olympia, Washington 98507

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE COST
REGION II		
NYD047663505	Georgia-Pacific Corporation 100-120 Adams Boulevard P. O. Box 250 Farmingdale, New York 11735	52,800
REGION V		
MID042441022	Georgia-Pacific Corporation Paper Division P. O. Box 2738 Kalamazoo, Michigan 49003	3,200
OHD054026679	Georgia-Pacific Corporation 1975 Watkins Road Columbus, Ohio 43207	30,600
OHD000721480	Georgia-Pacific Corporation 786 Hardy Road Painesville, Ohio 44077	5,300
REGION VII		
MOD092351642	Georgia-Pacific Corporation 40 Merchant Street St. Genevieve, Missouri 63670	3,200
MOD046376398	Georgia-Pacific Corporation 3810 Paule Avenue St. Louis, Missouri 63125	3,200
REGION X		
WAD057311334	Georgia-Pacific Corporation Chem-Pac Operations 111 3rd Street, N.W. Auburn, Washington 98002	8,400
WAD009252297	Georgia-Pacific Corporation 300 Laurel Street P. O. Box 1236 Bellingham, Washington 98227	132,000
WAD050175918	Georgia-Pacific Corporation 1203 Fones Road P. O. Box 547 Olympia, Washington 98507	6,300

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: NONE.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

EPA I.D. NO.	FACILITY LOCATION	CLOSURE COST
ARIZONA		
AZD080664881	Georgia-Pacific Corporation 4239 N. 39th Avenue P. O. Box 14528 Phoenix, Arizona 85019	3,200
ARKANSAS		
ART060010048	Georgia-Pacific Corporation Resin Division P. O. Box 520 Crossett, Arkansas 71635	52,800
ARD006345403	Georgia-Pacific Corporation 205 Michigan Street Box 7086 Pine Bluff, Arkansas 71601	3,200
CALIFORNIA		
CAD085393080	Georgia-Pacific Corporation Chem-Pac Operations 2501 Malt Avenue City of Commerce, California 90040	42,300
CAD009380890	Georgia-Pacific Corporation Chem-Pac Operations 760 South Vail P. O. Box 22046 Montebello, California 90040	52,800

CAD089184097	Georgia-Pacific Corporation 90 W. Redwood Avenue Fort Bragg, California 95437	3,200
CAD096233564	Georgia-Pacific Corporation 75 W. Valpico Road P. O. Box 239 Tracy, California 95376	52,800
CAT000624296	Georgia-Pacific Corporation 2163 N. State Street Ukiah, California 95482	26,400
GEORGIA		
GAD093697233	Georgia-Pacific Corporation 2883 Miller Road Decatur, Georgia 30035	2,100
GAD990741332	Georgia-Pacific Corporation P. O. Box 267 Savannah, Georgia 31498	5,300
ILLINOIS		
ILD049816432	Georgia-Pacific Corporation No. 1 Label Lane Lockport, Illinois 60441	5,300
LOUISIANA		
LAD057117434	Georgia-Pacific Corporation Chemical Division P. O. Box 629 Plaquemine, Louisiana 70764	10,565,000
NEW JERSEY		
NJD062036892	Georgia-Pacific Corporation 290 Ferry Street Newark, New Jersey 07105	11,600
NJD980654032	Georgia-Pacific Corporation 100 Normandy Drive Piscataway, New Jersey 08805	21,100

NORTH CAROLINA

NCD006162l9	Georgia-Pacific Corporation Hamlet Multiwall Plant P. O. Box 1149 Hamlet, North Carolina 28345	2,100

OKLAHOMA

OKD007217425	Georgia-Pacific Corporation Route 69-A P. O. Box 578 Pryor, Oklahoma 74361	6,300

OREGON

ORD000405233	Georgia-Pacific Corporation Resin Division P. O. Box 1068 Albany, Oregon 97321	8,400
ORT420010019	Georgia-Pacific Corporation Resin Division P. O. Box 9 Coos Bay, Oregon 97420	44,400
ORD009411505	Georgia-Pacific Corporation P. O. Box 580 Toledo, Oregon	5,300

SOUTH CAROLINA

SCD991289695	Georgia-Pacific Corporation P. O. Box 6347 Spartanburg, South Carolina 29304	10,600
SCD042634121	Georgia-Pacific Corporation Williams Furniture Division P. O. Drawer 1489 Sumter, South Carolina 29150	5,300

TEXAS

TXD08836081	Georgia-Pacific Corporation Bellingham Division Houston Chemical Plant 10120 Hirsch Road Houston, Texas 77016	10,600

TXD093565653	Georgia-Pacific Corporation Houston Cumene Plant 3503 Pasadena Freeway P. O. Box 1959 Pasadena, Texas 77501	37,000
TXD074160391	Georgia-Pacific Corporation 1429 East Lufkin P. O. Box 938 Lufkin, Texas 75901	21,100

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: NONE.

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1982.

ALTERNATIVE II

1.	Sum or current closure and post-closure cost estimates (total of all cost estimates listed above)	$ 11,243,200.00
2.	Amount of annual aggregate liability coverage to be demonstrated	$ 1,000,000.00 each occurrence $ 2,000,000.00 aggregate
3.	Sum of lines 1 and 2	$ 13,243,200.00
4.	Current bond rating of most recent issuance and name of rating service	A, Moody
5.	Date of issuance of bond	6-15-80

6. Date of maturity of bond 6-15-90

*7. Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line) $ 2.186 Billion

*8. Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.) N/A

	YES	NO
9. Is line 7 at least $10 million?	x	
10. Is line 7 at least 6 times line 3?	x	
*11. Are at least 90% of assets located in the U.S.? If not, complete line 12	x	
12. Is line 8 at least 6 times line 3?	N/A	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

BVG

T. Marshall Hahn, Jr.

T. Marshall Hahn, Jr.
President and Chief Operating Officer

Date: March 30, 1983

ARTHUR ANDERSEN & CO.

25 PARK PLACE, N.E.
ATLANTA, GEORGIA 30303
(404) 658-1776

April 1, 1983

To Georgia-Pacific Corporation:

We have examined the balance sheet of Georgia-Pacific Corporation and subsidiaries as of December 31, 1982, and the related statements of income, common shareholders' equity and changes in financial position for the year then ended, and have expressed an unqualified opinion on those statements in our report dated February 11, 1983. We have not performed any auditing procedures since that date. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request, we have read the letter dated April 1, 1983, from your Chief Financial Officer to the U.S. Environmental Protection Agency to demonstrate both liability coverage and assurance of closure care required by Subpart H of 40 CFR Parts 264 and 265. As further required by 40 CFR 264.147(f)(3)(iii) and 265.147(f)(3)(iii), we have compared the data which the letter from the Chief Financial Officer specifies as having been derived from the independently audited financial statements as of and for the year ended December 31, 1982, referred to above with the corresponding amounts in such financial statements. In connection with this procedure, no matters came to our attention which caused us to believe that the specific data should be adjusted.

This report relates only to the data specified above and does not extend to the financial statements of Georgia-Pacific Corporation and subsidiaries, taken as a whole, for the year ended December 31, 1982. It is furnished solely for the use of Georgia-Pacific Corporation for distribution to the U.S. Environmental Protection Agency and is not to be used for any other purposes.

Arthur Andersen & Co.

Georgia-Pacific Corporation

Law Department

133 Peachtree Street, N.E.
Atlanta, Georgia 30303
Telephone (404) 521-4810

Beverly V. Gholson
Attorney

RECEIVED
APR 06 1983
WASTE MANAGEMENT BRANCH

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

March 31, 1983

Regional Administrator
Region V, Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

RE: GEORGIA-PACIFIC CORPORATION, EPA FINANCIAL RESPONSIBILITY REQUIREMENTS

Dear Sir or Madam:

Pursuant to 40 CFR Section 265 concerning the financial assurance requirements of facilities which treat, store or dispose of hazardous waste, Georgia-Pacific Corporation hereby submits the attached letter to demonstrate both liability coverage and assurance of closure or post-closure care. As required by the regulations, this letter provides the financial strength information and the updated closure costs for fiscal year 1982. Also, I have included a copy of Georgia-Pacific's 1982 Annual Report and a special report from our independent certified public accountant.

As you will note, the following facilities have been deleted from this report as Georgia-Pacific has requested that they be removed from interim status in the Resource Conservation and Recovery Act program:

EPA I.D. NO.	FACILITY LOCATION
ILD005443759	Georgia-Pacific Corporation Elm Street & Hopper Drive P.O. Box 369 Taylorville, Illinois 62568

IND003938800

Georgia-Pacific Corporation
Second Place and Waite Street
P.O. Box 4326
Gary, Indiana 46404

OHD004251930

Georgia-Pacific Corporation
4575 Eastern Avenue
Cincinnati, Ohio 45226

If you have any questions or need further information, please contact me.

Very truly yours,

Beverly V. Gholson

Beverly V. Gholson

BVG/dlc

cc: Plant Managers:

Lockport, IL
Taylorville, IL
Gary, IN
Kalamazoo, MI
Cincinnati, OH
Columbus, OH
Painesville, OH

C.2 Compliance And Enforcement

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

Plainwell District Headquarters
P.O. Box 355, Plainwell, Michigan 49080

January 31, 1989

Philip Hester
Georgia-Pacific
2425 King Highway
Kalamazoo, Michigan 49001

Re: EPA ID #MID042441022

Dear Mr. Hester:

On January 26, 1989, staff of the Department of Natural Resources conducted an inspection of your facility to evaluate compliance with requirements of Subtitle C of the Resource Conservation and Recovery Act, 1976, as amended (RCRA); Michigan's Hazardous Waste Management Act, 1979 PA 64, as amended (Act 64); and Michigan's Liquid Industrial Waste Haulers Act, 1969 PA 136, as amended (Act 136).

Based upon the inspection, it has been determined the facility is operating as a small quantity generator, in that less than 1,000 kilograms of hazardous waste is generated per month. The facility was in violation of the following requirements:

1. An emergency coordinator has not been identified as required by R 299.9306(4)(f).

2. Emergency information was not posted near the telephone as required by R 299.9306(4)(g).

3. Employees have not been trained in waste handling and emergency procedures relevant to their positions as required by R 299.9306(4)(a).

It is requested that you respond by February 28, 1989, providing documentation of the actions taken to correct these violations. I have enclosed some emergency notification stickers for your use.

In addition, I spoke with Cheryl Howe of our Division's Hazardous Waste Permit Section regarding the status of the company's request for a change in RCRA status from a treatment/storage/disposal facility to a generator facility. Ms. Howe will be handling this request.

If you have any questions regarding this matter, please feel free to contact me at (616) 685-9886.

Sincerely,

Lynn M. Spurr

Lynn M. Spurr
Environmental Quality Analyst
Waste Management Division
Plainwell District

LMS:ls

Enclosure

cc: U.S. EPA - Region 5

Georgia Pacific - generates D001 waste

APP

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	____	____	____	____	____
2.	F002	____	____	____	____	____
3.	F003	____	____	____	____	____
4.	F004	____	____	____	____	____
5.	F005	____	____	____	____	____

NA

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. <u>California List Wastes</u>

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

NA

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	____	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

NA

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

____	____	____	____	____

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

[redacted]

ROUTING AND TRANSMITTAL SLIP

Date 10/14/86

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Mr. Rodney Woods - Georgia-Pacific		
2.		
3.		
4.		
5.		

X	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate		For Your Information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

As per our telephone conversation, attached is a copy of 40 CFR 270.11 which should replace the wording of item #3 on the attached "Request for Change in Status" form. Resubmit this form, leaving items 1 + 2 as they are, and with the reworded item #3. Refer to the Agency's letter to you, dated Mar. 21, 1986, for the proper signatory on the form.

Should you have questions, please call me at (312) - 886-6151.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
Lorna M. Jereza, U.S. EPA 230 S. Dearborn, Chicago, Il. 60604	5HS-13
	Phone No. (312) 886-6151

5041-102 ★U.S.GPO:1986-0-491-247/20047

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

L. JETEZA

(Prior to completing Part I, refer to regulations and instructions page 5.)

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

RECEIVED OCT 23 1986 SOLID WASTE U.S. EPA REGION V

PART I
GENERAL INFORMATION

1. Name of facility Georgia-Pacific Corporation
2. Type of facility Paper Manufacturer
3. Location of facility 2425 King Hwy
   Kalamazoo, MI in
   Kalamazoo County
4. Name and address of owner or operator:
   Name Georgia-Pacific Corporation
   Address 2425 King Highway
   Kalamazoo, MI 49001
   Attn: David R. Norman, Resident Manager
5. Designated person accountable for oil spill prevention at facility:
   Name and title Rodney D. Woods, Safety Director
6. Facility experienced a reportable oil spill event during the twelve months prior to Jan. 10, 1974 (effective date of 40 CFR, Part 112). (If YES, complete Attachment #1.) No

MANAGEMENT APPROVAL

This SPCC Plan will be implemented as herein described.

Signature David R. Norman

Name David R. Norman

Title Resident Manager

CERTIFICATION

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices.

DOUGLAS J. DINGWALL
Printed Name of Registered Professional Engineer

(Seal)

Douglas J. Dingwall
Signature of Registered Professional Engineer

Date 10/9/86

Registration No. 28056 State MI.

EPA

Plainwell District Headquarters
Box 355, Plainwell, Michigan 49080

January 7, 1985

Rodney Woods
Georgia-Pacific
2425 Kings Highway
Kalamazoo, Michigan 49003

Re: EPA ID # - MID 042441022

Dear Mr. Woods:

On December 18, 1984, staff of the Department of Natural Resources, acting as representatives of the United States Environmental Protection Agency, conducted an investigation of your facility located in Kalamazoo, Michigan, to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended; Michigan's Hazardous Waste Management Act (P.A. 64 1979, as amended); and Michigan's Liquid Industrial Waste Hauling Act (P.A. 136 1969).

As a result of that investigation, staff of the Department have determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found:

1. The contingency plan must be updated to reflect the change in the alternate emergency coordinator as required by 40 CFR 265.54.

2. The contingency plan should contain an evacuation plan as required by 40 CFR 265.52.

You indicated that you would like to change the company's status from a treatment, storage, and disposal facility (TSDF) to a generator, since you do not plan to store hazardous waste for more than 90 days. Once the existing waste in storage is shipped off-site, you may request a change in status from the United States Environmental Protection Agency in Chicago.

We request that you respond to this letter by February 8, 1985, providing documentation to this office regarding those actions taken to correct these

continued...

violations. The Department of Natural Resources will forward your response to the United States Environmental Protection Agency with a recommendation regarding your facility's compliance status.

If you have any questions regarding this matter, please feel free to contact me at (616) 685-9886.

Sincerely,

LSP

Lynn M. Spurr, Water Quality Specialist
Hazardous Waste Division
Plainwell Compliance District

LMS:ls

Enclosure

cc: U.S. EPA - Region V
Bohunsky, w/inspection report (C&E File)
Howard

RCRA Inspection Report

EPA Identification Number: M I D 0 4 2 4 4 1 0 2 2

Installation Name: Georgia Pacific

Location Address: 2425 Kings Highway

City: Kalamazoo State: MI 49003

Date of inspection: 12/18/84 Time of inspection (from) 1:30 (to) 3:30

Person(s) interviewed	Title	Telephone
Rodney Woods	Safety Dir. Env. Engr.	616 382-2890 ext 323

Inspector(s)	Agency/Title	Telephone
Lynn Spurr	MDNR/WQS	616 685-9886

Installation Activity (mark only one box)	Inspection Form(s)
[ ] Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation	A
[X] Treatment/Storage/Disposal (no generation or Transportation)	A
[ ] Generation and Transportation	B, C
[ ] Generation only	B
[ ] Transportation only	C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	☑	storage in containers	I
S02	☐	storage in tanks	J
T01	☐	treatment in tanks	J
S04	☐	storage in surface impoundment	K,F
T02	☐	treatment in surface impoundment	K,F
D83	☐	disposal in surface impoundment	K,F
S03	☐	storage in waste pile	L
D81	☐	disposal by land application	M,F
D80	☐	disposal in landfill	N,F
T03	☐	treatment by incineration	O/P
T04	☐	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	☑	APPENDIX	GN
TRANSPORTER	☐	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

Ø

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?				not applicable
b. Facility expansion?				↓
c. Change of owner or operator?				
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓			co. has analysis of waste
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓			plan is adequate considering quantity & type of waste generated
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?				not applicable, do not accept waste from off-site
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	✓			
or				
b. i. Artificial or natural barrier around facility?				
and				
ii. Controlled entry?				
c. Danger sign(s) at entrance?	✓			
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	✓			

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	✓			
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?				N/A, only have drum storage
ii. safety and emergency equipment?	✓			
iii. security devices?	✓			
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	✓			
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	✓			
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	✓			
d. Are areas subject to spills inspected daily when in use?	✓			
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	✓			
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	✓			
ii. the name of the inspector?	✓			
iii. a notation of the observations made?	✓			
iv. the date and nature of any repairs or remedial actions?	✓			
5. Do personnel training records include: 265.16				
a. Job titles?	✓			
b. Job descriptions?	✓			

	YES	NO	NI	Remarks
c. Description of training?	✓			
d. Records of training?	✓			
e. Did facility personnel receive the required training by 5-19-81?			✓	
f. Do new personnel receive required training within six months?				will do
g. Do personnel training records indicate that personnel have taken part in an annual review of initital training?				annual review due in 1st quarter of '85
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	✓			
b. No smoking signs?	✓			
c. Separation and protection from ignition sources?	✓			

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

Maintenance and Operation of Facility: 265.31	YES	NO	NI	Remarks
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
2. If required, does the facility have the following equipment: 265.32				
a. Internal communications or alarm systems?	✓			
b. Telephone or 2-way radios at the scene of operations?	✓			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

City water + Kalamazoo River

3. Testing and Maintenance of Emergency Equipment: 265.33				
a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
b. Is emergency equipment maintained in operable condition?	✓			
4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	✓			
5. Is there adequate aisle space for unobstructed movement?	✓			
6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	✓			

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	✓			
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	✓			
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			needs to be updated due to change in personnel
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	✓			need to include location of equipment in plan
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)		✓		G.P has evac. plan per Rodney, must be located + placed in contingency plan
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53	✓			

	YES	NO	NI	Remarks
Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	✓			
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				no emergency

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				
a. Is the facility closure plan available for inspection?	✓			
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	✓			
ii. maximum hazardous waste inventory?	✓			
iv. estimated year of closure?	✓			
v. schedule of closure activities?	✓			
c. Has closure begun?		✓		
*2. Post-Closure 265.118				
a. Is the post-closure plan available for inspection?				Not app.
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?				
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable				
BB. facility monitoring equipment				
iii. name, address, and phone number of person or office to contact during post-closure care period?				
c. Has the post-closure period begun?				
d. Is the written post-closure cost estimate available? 265.144				

*Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		YES	NO	NI	Remarks
1.	Are containers in good condition? 265.171	✓			
2.	Are containers compatible with waste in them? 265.172	✓			
3.	Are containers managed to prevent leaks? 265.173	✓			
4.	Are containers stored closed?	✓			
5.	Are containers inspected weekly for leaks and defects.	✓			
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	✓			
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177				Not applicable
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				✓

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	✓			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. 3				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	✓			
b. Name, mailing address, telephone number, and EPA ID number of Generator	✓			
c. Name and EPA ID Number of Transporter(s)?	✓			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	✓			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
f. The total quantity of waste(s) and the type and number of containers loaded?	✓			
g. Required certification?	✓			
h. Required signatures?	✓			

(4) Reportable exceptions 262.42

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. 0

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	✓			
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	✓			
3. If required, are placards available to transporters of hazardous waste? 262.33				transporter supplie

4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box [✓] and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision

	YES	NO	NI	Remarks
a. Is each container clearly marked with the start of accumulation date?				
b. Have more than 90 days elapsed since the date inspected in (a)?				
c. Do wastes remain in accumulation tanks for more than 90 days?				
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?				

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	✓			

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

	YES	NO	NI	Remarks
1. Has the installation imported or exported Hazardous Waste? 262.50		✓		

(If answered Yes, complete the following as applicable.)

a. Exporting Hazardous waste; has a generator:

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION
JACOB A. HOEFER
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

District 12 Headquarters
P.O. Box 355
Plainwell, MI 49080

June 27, 1983

Mr. Paul Stofer
Environmental Engineer
Georgia-Pacific Corporation
P.O. Box 2738
2435 King Highway
Kalamazoo, MI 49007

MID 042 441 022

Dear Mr. Stofer:

On June 7, 1983, staff of the Department of Natural Resources conducted an investigation of your facility located at 2435 King Highway in Kalamazoo, Michigan, to evaluate compliance with requirements of the Federal Resource Conservation and Recovery Act (RCRA) and Michigan's Hazardous Waste Management Act (P.A. 64, 1979).

As a result of that investigation, staff of the Department of Natural Resources have determined that the above facility is in violation of the following requirements:

1. Personnel training records did not include the information required by 40 CFR 265.16.

2. Arrangements for emergency services have not been agreed to by local police and fire departments as required by 40 CFR 265.37.

3. The contingency plan did not include an evacuation plan as required by 40 CFR 265.52 (f).

4. Copies of the contingency plan have not been submitted to the local police and fire departments as required by 40 CFR 265.53.

5. The closure plan did not include a schedule of closure activities as required by 40 CFR 265.112.

6. Containers are not presently being inspected weekly for leaks and defects as required by 40 CFR 265.174.

7) The hazardous waste storage area does not have secondary containment as required by the Part 7 rules of Act 64.

We request that you respond to this letter by July 29, 1983, providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact me at (616) 685-6706.

Sincerely,

HAZARDOUS WASTE DIVISION

Lynn M Spurr

Lynn M. Spurr
Resource Specialist

LMS:bjw

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION
JACOB A. HOEFER
PAUL T. JOHNSON
E.M. LAITALA
HILARY F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

State Office Building
350 Ottawa N. W.
Grand Rapids, Michigan 49503
Phone: 456-6232

April 5, 1982

Mr. Paul Stofer
Effluent Engineer
Georgia Pacific Corporation
Kalamazoo Division
P.O. Box 2738
2435 King Highway
Kalamazoo, MI 49007

Dear Mr. Stofer:

On March 31, 1982, staff of the Department of Natural Resources conducted an investigation* of your facility located at 2425 King Highway in Kalamazoo, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that investigation, staff of the Department of Natural Resources have determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

1. A written waste analysis plan was not available as required in 40 CFR 265.13 (a)(1) 265.13 (4)(b)(1)(2)(3)(4).
2. A written inspection schedule was not available as required in 40 CFR 265.15 (b)(1)(2)(3)(4).
3. The Spill Prevention Control and Countermeasures (SPCC) Plan does not address the storage of hazardous waste as required in 40 CFR 265.52 (b)(c)(d)(e)(f) and 265.53 (a)(b).
4. A closure plan was not available as required in 40 CFR 265.112 (a)(1)(2)(3)(4).

We request that you respond to this letter by May 21, 1982 providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter please feel free to contact me at (616) 456-6232.

Sincerely,

WATER QUALITY DIVISION

Roger Przybysz

Roger Przybysz
Water Quality Specialist

RP/mam
CC: Al Howard, Office of Hazardous Waste Management
EPA Region V

*RCRA Inspection Report Enclosed

MICHIGAN THE GREAT LAKE STATE
R1026-1 1/79

STATE IDENTIFICATION NUMBER
(If Applicable)

MID 049416 22
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: GEORGIA - PACIFIC CORP

(B) Street: 2425 KING HIGHWAY [illegible]

(C) City: KALAMAZOO (D) State: MICHIGAN (E) Zip Code: 49003

(F) Phone: 616/382-2540 (G) County: KALAMAZOO

(H) Operator: GEORGIA - PACIFIC CORP

(I) Street: 900 S.W. FIFTH AVENUE

(J) City: PORTLAND (K) State: OREGON (L) Zip Code 97204

(M) Phone: 503/222-5561 (N) County:

(O) Owner: GEORGIA - PACIFIC CORP

(P) Street: 900 S.W. FIFTH AVENUE

(Q) City: PORTLAND (R) State: OREGON (S) Zip Code: 97204

(T) Phone: 503/222-5561 (U) County:

(V) Date of Inspection: 9/21/82 (W) Time of Inspection (From) [illegible] (To) 15:30

(X) Weather Conditions: CLOUDY - CONSIDERABLE HEAT

Rev. 1-26-81/J.B.

(Y) Person(s) Interviewed	Title	Telephone
Paul Stofler	Effluent Engineer	616/382-2890
Fred Shelton	Plant Engineer	616/382-2890
Larry Pio	Assistant Paper Mill Supt.	616/382-2890

(Z) Inspection Participants	Agency/Title	Telephone
Roger Przybysz	DNR Water Quality Specialist	616/456-6232

(AA) Preparer Information

Name	Agency/Title	Telephone
Roger Przybysz	Water Quality Specialist	616/456-6232

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

✓ A. Storage and/or Treatment
1. Containers (I)
2. Tanks (J)
3. Surface Impoundments (K)
4. Waste Piles (L)

___ B. Land Treatment (M)

___ C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

___ E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?				No Hazardous Waste Received
2. Facility expansion?				No Expansion
(B) General waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓			
2. Does the owner or operator have detailed waste analysis plan on file at the facility?		✓		No Plan on file
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?		✓		" "
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?		✓		
2. Artificial or natural barrier around facility?	✓			
3. Controlled entry?	✓			
4. Danger sign(s) at entrance?	✓			
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?		✓		Currently only Five(5)
2. Records of operator error?		✓		Barrels are Being Stored
3. Records of discharges?		✓		

*Not Inspected

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule:	✓			
5. Safety, emergency equipment?	✓			
6. Security devices?	✓			
7. Operating and structural devices?		✓		ONLY BARREL STORAGE
8. Inspection log?	✓			
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job Titles?	✓			
2. Job Descriptions?	✓			
3. Description of Training?	✓			
4. Records of Training?	✓			2/20/81 + 6/81
5. Have facility personnel received required training by 5-19-81?	✓			
6. Do new personnel receive required training within six months?	✓			
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	✓			NONE OF THESE WASTE PRESENTLY STORED
2. No smoking signs?		✓		SMOKING ONLY IN APPROVED AREAS PLANT POLICY
3. Separation and protection from ignition sources?	✓			

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

1. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? ✓

(B) If required, does the Facility have the Following Equipment:

1. Internal communications or alarm systems? ✓ — REQUIRED AS PART OF PLANT CHANGES
2. Telephone or 2-way Radios at the scene of operations? ✓
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? ✓

Indicate the volume of water and/or foam available for fire control:

Units: Unlimited Use on Kanawha River

(C) Testing and Maintenance of Emergency Equipment:

1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment? ✓
2. Is Emergency Equipment Maintained in Operable Conditions? ✓

(D) Has Owner or Operator Provided Immediate Access to Internal Alarms? (if needed) ✓

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement? ✓ ___ ___ ___

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the contingency Plan contain the following information:

	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	___	✓	___	SPCC DOES NOT ADDRESS HAZARDOUS WASTE
2. Arrangements agreed to by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	✓	___	___	NOT IN WRITING
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓	___	___	IN SPCC
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	___	✓	___	___
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	___	✓	___	MANAGER PRESENTLY STATED WOULD NOT REQUIRE EVACUATION

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(b) Are copies of the Contingency Plan Available at Site and local Emergency Organizations?	✓			
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	✓			In SPCC
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			" "
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			" "
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				HAS NOT OCCURRED

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	✓			No Hazardous Waste Shipped AS OF THIS INSPECTION
2. Are records of past shipments retained for 3 years				N/A " "
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?	✓			

*Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73? ✓

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each wastes treatment, storage, or disposal as required in Appendix I?

c. The location and quantity of each hazardous waste within the facility?

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest numbers, if waste was accompanied by a manifest.) N/A Storage only*

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

f. Reports detailing all incidents that required implementation of the contingency plan? N/A

g. All closure and past closure costs as applicable? (Effective 5-19-81) N/A

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VIII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?		✓		
2. Has this plan been submitted to the Regional Administrator		✓		
3. Has Closure begun?		✓		
4. Is closure estimate available by May 19, 1981?		✓		
(B) Post Closure Care and Use of Property				
Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?				N/A

IX. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	✓			
3. Are containers stored closed?	✓			
4. Are containers managed to prevent leaks?	✓			
5. Are containers inspected weekly for leaks and defects?		✓		Permanently
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	Indicate if waste is: ☐ Ignitable, ☐ Reactive			N/A Non Hazardous Stored

*Not Inspected

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?				[illegible]

J
TANKS N/A

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containement structures?				
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				Indicate if waste is: ☐ Ignitable ☐ Reactive
7. Are incompatible waste stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				

*Not Inspected

	Yes	No	NI*	Remarks

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

   Tank capacity: _____ gallons

   Tank diameter: _____ feet

   Distance of tank from property line _____ feet

   (See table 2 - 1 through 2 - 6 of NRPA's "Flammable and Combustible Code - 1977" to determine compliance.)

K N/A
SURFACE IMPOUNDMENTS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective covers?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are imcompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				

L N/A

WASTE PILES

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from the wind?				
2. Is each in-coming movement of waste analyzed before being added to the waste pile?				
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	Indicate if waste is: ☐ Ignitable, ☐ Reactive			
5. Are piles of reactive or ignitable waste protected?				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)				
7. Are piles of imcompatible waste protected by barriers or distance from other waste?				

*Not Inspected

M N/A

LAND TREATMENT

FAcility Name: _____ Date of Inspection: _____

1. Is hazardous waste, treated capable of biological or chemical degradation? ___ ___ ___ _____

2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)? ___ ___ ___ _____

3. Is waste analyzed according to 265.273? ___ ___ ___ _____

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276? ___ ___ ___ _____

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? ___ ___ ___ _____

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278? ___ ___ ___ _____

7. Are records kept regarding application dates, ~~and~~ rates, quantities, and locations of all hazardous waste placed in the facility? ___ ___ ___ _____

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? Indicate if waste is: ☐ Ignitable ☐ Reactive ___ ___ ___ _____

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) ___ ___ ___ _____

*Not Inspected

N N/A

LANDFILLS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	___	___	___	_____
**2. Collection of run-off from active portions of the fill?	___	___	___	_____
**3. Is collected run off treated?				_____
4. Control of wind disposal of hazardous waste?	___	___	___	_____
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	___	___	___	_____
2. The contents of each cell and the location of each hazardous waste type withing each cell?	___	___	___	_____
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	___	___	___	_____
2. Has this plan been submitted to the Regional Administrator?	___	___	___	_____
3. Has Closure begun?	___	___	___	_____
4. Is Closure cost estimate available by 5-19-81?				
(D) Special requirements ~~fro~~ for ignitable or reactive waste				
Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive?	___	___	___	_____

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.				
(E) Special requirements for Incompatible Wastes.				
Does the owner or ooperator dispose of incompatible wastes in separate cells?				
If not, the provisions of 40 CFR 265.17(b) apply.				
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?				
2. Does the landfill have a chemically and physically resistant liner system?				
3. Does the landfill have a functional leachate collection system?				
4. Are fee liquids stabilized prior to or immediately after placement in the landfill?				
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being, buried beneath the surface of the landfill?				

*Not Inspected

O and P 4/4

INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment:): _____

_____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

	Component	Yes	No	NI*	Remarks
1.					
2.					
3.					
4.					
5.					

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

	Yes	No	NI*	Remarks
1. Required analyses; has an analysis been performed for the following:				
a. Heating value				
b. Halogen content				
c. Sulfur content				

*Not Inspected

	Yes	No	NI*	Remarks
2. Documented, written data may be substituted for analysis for these. Are either present for:				
a. Lead?	___	___	___	_____
b. Mercury?	___	___	___	_____

B. Other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested for.)

		Remarks
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

III. Monitoring and Inspections

	Yes	No	NI*	Remarks
A. Combustion/emission control instruments monitored at least every 15 minutes	___	___	___	_____
B. Steady state maintained or corrections attempted?	___	___	___	_____
C. Stack Plume observed at least hourly for normal color and opacity?	___	___	___	_____
D. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
F. Complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
G. Emergency shutdown controls, system alarms checked daily for proper operation?	___	___	___	_____

*Not Inspected
**Specify in Remarks for what period of time this was checked.

IV. Open Burning N/A

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)				
2. If this facility open-burns waste explosive, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)				

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1.250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q N/A
CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?				
2. Is a continously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)				

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutraliz wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

I. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the Manifest available for review?	✓	___	___	A. Hazardous Waste Shipped [illegible] Non-hazardous [illegible]
(B) Do the Manifest forms reviewed contain the following information: (If possible, make copies of/or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	___	___	___	A. Hazardous Waste Shipped
2. Name, mailing address, telephone number, and EPA ID Number of Generator	___	___	___	" "

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?				No Hazardous Waste Shipped
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?				N/A
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?				N/A
6. The total quantity of waste(s) and the type and number of containers loaded?				N/A
7. Required Certification?				N/A
8. Required Signatures?				N/A
(C) Does the Owner or Operator Submit Exception Reports when Needed?				N/A

2. PRE-TRANSPORT REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off site)	✓			
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials? (Required to movement of hazardous waste off site)	✓			
(C) If required, are placards available to transfer?	✓			

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	✓			
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days		✓		
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	✓			
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?		N/A		BARREL STORAGE ONLY
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?				
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?				N/A
c. Do continous feed systems have a waste-feed cutoff?				N/A
d. Are required daily and weekly inspections done?				N/A
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?				N/A
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)				N/A

*Not Inspected

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	✓			no Hazardous Waste Shipped
(B) Has the Generator submitted Annual Reports and Exception Reports as required?				N/A

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
(A) Has the installation imported or exported Hazardous Waste?		✓		

(If A was answered Yes, then complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
a. Met the manifest requirements?				

*Not Inspected

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
(A) Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?				

II. INTERNATIOINAL SHIPMENTS

A. Does the Transporter record on the manifest the date the waste left the U.S.?				
B. Are signed completed manifest(s) on file?				

V. MISCELLANEOUS

A. Does Transporter transport hazardous waste into the U.S. from abroad				
B. Does the Transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?				

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Georgia-Pacific Corporation *2425 King Highway*
Kalamazoo, Michigan 49003
Telephone (616) 382-2890

May 21, 1982

RECEIVED
MAY 24 1982
DISTRICT 3
WATER QUALITY DIV.

Mr. Roger Przybysz
Water Quality Division
Department of Natural Resources
Michigan DNR
350 Ottawa NW
State Office Building
Grand Rapids, MI 49503

Dear Roger,

Enclosed please find a copy of our Hazardous Waste Management Plan. I believe this will fulfill the particular requirements of Subtitle C of RCRA of which we were in violation.

If there are any questions about this Plan, please call me.

Sincerely yours,

Paul H. Stofer
Effluent Engineer

PHS:CC

Encl.

cc: T. Sullivan
D. Norman
F. Shelton
W. Kendrick
R. Bush
K. Bentley--Atlanta

RECEIVED
MAY 24 1982
DISTRICT 3
WATER QUALITY DIV.

HAZARDOUS WASTE MANAGEMENT PLAN
GEORGIA-PACIFIC CORPORATION
KALAMAZOO, MICHIGAN

SUBMITTED BY
PAUL H. STOFER
MAY 18, 1982

HAZARDOUS WASTE MANAGEMENT PLAN

Name of Facility:	Georgia-Pacific Corporation EPA ID - MID 042441022
Location:	2425 King Highway Kalamazoo, MI in Kalamazoo County
Mailing Address:	Box 2738 Kalamazoo, MI 49003
Owner:	Georgia-Pacific Corporation 900 SW Fifth Avenue Portland, OR 97204
Operator:	Georgia-Pacific Corporation ATTN: David S. Dimling Director of Marketing and Sales 320 Post Road Darien, CT 06820
Facility Contact:	Mr. Thomas F. Sullivan, Resident Manager Georgia-Pacific Corporation 2425 King Hwy. Box 2738 Kalamazoo, MI 49003 Phone: (616) 382-2890

1. CHEMICAL AND PHYSICAL ANALYSIS OF WASTES

The Kalamazoo Division, during its manufacturing operations, does not generate any hazardous wastes. The hazardous wastes which might be generated would be from obsolete, expired, or spilled raw materials. Due to this fact, the exact physical and chemical properties of the materials would be known from the suppliers' safety data and general product information sheets.

If for any reason there is doubt as to the chemical analysis, a representative sample of the material will be sent to an EPA approved lab. The lab will be instructed to test for the following as necessary using EPA approved methods: pH, flash point, EP toxicity, corrosivity and reactivity. From the results of these tests, the material will be classified as hazardous or non-hazardous and will be packaged, labeled, stored and disposed of according to EPA, DNR and DOT regulations.

2. GENERAL INSPECTION SCHEDULE

The hazardous waste area will be inspected on a bi-monthly basis which will be sufficient for the type of wastes which might be stored there. The inspection will include checking the stored wastes for deterioration, corrosion, physical damage and leakage. Results will be noted on the Hazardous Waste Inventory Report which will be kept on file in the Technical Department.

In the event an inspection discovers a spill or leakage, measures for control and removal of the spilled or leaked waste will be implemented.

3. CLOSURE PLAN

3.1 General. The final closure of this facility will entail removal of all containerized wastes on-site, and a final cleaning of the hazardous waste storage area. Because the facility is associated with a manufacturing complex, it is not possible to estimate the expected year of closure. Georgia-Pacific believes the operating life of the facility will exceed twenty years.

3.2 Procedure.

3.2.1 Waste Removal. All drums of hazardous waste on the site at the time of closure will be sent to a permitted off-site facility. It is estimated that fewer than 20 drums will be on-site at all times, including at final closure.

3.2.2 Storage Area Floor. The floor of the storage area will be thoroughly swept and all solid material placed in drums for shipment to an approved disposal facility.

PHS:CC

May 18, 1982

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

This contingency plan has been submitted pursuant to 40 CFR 264, Subpart D. It contains the following:

1. General Information
2. Emergency Coordinators
3. Implementation
4. Procedures
5. Emergency Equipment
6. Coordination Agreements
7. Evacuation Plan
8. Required Reports and Records

1. General Information.

1.1 Name: Georgia-Pacific Corporation, Kalamazoo Paper Div.

1.2 Location: 2425 King Hwy., Kalamazoo, MI in Kalamazoo County

1.3 Mailing address: Box 2738
Kalamazoo, MI 49003

1.4 Operator: Georgia-Pacific Corporation
ATTN: David S. Dimling
Director of Marketing and Sales
320 Post Road
Darien, CT 06820

1.5 Facility Contact: Thomas F. Sullivan, Resident Manager
Office phone: (616) 382-2890
Home address: [redacted] Non responsive
Home phone: Non [redacted]

1.6 Type of Facility: This facility manufactures fine printing papers from de-inked wastepaper which is also produced at this facility.

1.7 Facility Site Plan: (See enclosed drawing)

1.8 Description of Hazardous Waste Activities: Hazardous waste which might be generated at this facility would be from obsolete, expired or spilled raw materials.

2. Emergency Coordinators.

2.1 Principal: Thomas F. Sullivan, Resident Manager
(See Item 1.5, above)

2.2 Alternates: Paul H. Stofer, Environ. Eng.
1558 S. Van Kal
Kalamazoo, MI 49009
Phone: (616) 375-4896

David R. Norman, Production Manager
2488 Quail Run Drive
Kalamazoo, MI 49009
Phone: (616) 375-4643 388-1068 (beeper)

2.3 The Emergency Coordinators have the authority to direct facility employees to assist in the event of an emergency.

2.4 The Emergency Coordinators and other facility personnel have received the necessary training to respond effectively to any anticipated emergency.

2.5 The Emergency Coordinators are available at work or by telephone. In the event the principal Emergency Coordinator is not available, the Alternates have full authority.

3. Implementation of the Contingency Plan.

The Contingency Plan will be implemented if there is a release of hazardous waste, hazardous chemicals or oil which poses a threat to human health or the environment. The Emergency Coordinator has the authority to make this assessment.

4. Emergency Response Procedures.

4.1 Implementation. Any employee who discovers a hazardous waste release must notify the Emergency Coordinator. The Emergency Coordinator will then evaluate the situation and implement those portions of Section 4.3 (Containment and Control) as necessary.

4.2 Notification. After taking immediate actions to minimize the threat to human health and the environment, the Emergency Coordinator will:

4.2.1 Call the National Response Center (800-424-8802) and the DNR (800-292-4706) to report the incident. The report will include the following:

- Name and telephone of the reporter;
- Name and address of the facility;
- Time and type of incident;
- Identification and quantity of materials involved;
- The extent of injuries, if any; and
- The possible hazards to human health or the environment outside the facility.

4.2.2 Call the Georgia-Pacific Department for Energy and Environment in Atlanta.

4.3 Containment and Control.

4.3.1 General. The Emergency Coordinator will take all necessary measures to contain the release of hazardous wastes.

4.3.2 Spills. In the event liquid wastes are spilled or leaked, absorbent material will be used to soak up flowing and dispersed liquids. All free flowing liquids will be contained within the plant complex. In the event of a piping failure, the transfer of liquid will be terminated and the spilled liquids will be controlled as indicated above.

4.4 Follow-up Action. Following control of the release, the Emergency Coordinator will provide for collection and disposal of the recovered waste and other contaminated materials, in accordance with appropriate federal and state hazardous waste disposal regulations.

The Emergency Coordinator will ensure that all emergency equipment is restored to full operational status.

The Emergency Coordinator will investigate the cause of the release and will take those steps necessary to prevent similar releases in the future.

The Emergency Coordinator will make the necessary reports as described in Section 8 (Required Reports and Records).

5. Emergency Equipment.

5.1 The plant maintains at least 20 bags of commercial absorbent materials at all times.

5.2 Shovels and brooms are available for cleaning up solids and spent absorbent.

5.3 A sufficient number of 55-gallon drums are available for containing recovered materials.

5.4 A portable, electrically-driven pump with appropriate lengths of hose is maintained at the plant to transfer liquids to tanks and drums.

6. Coordination Agreements. Due to the nature of the hazardous wastes handled at this facility, there is only need for prior agreement with the fire department.

7. Evacuation Plan. The hazards presented by the wastes which might be stored at our facility are not such as to require evacuation of the facility.

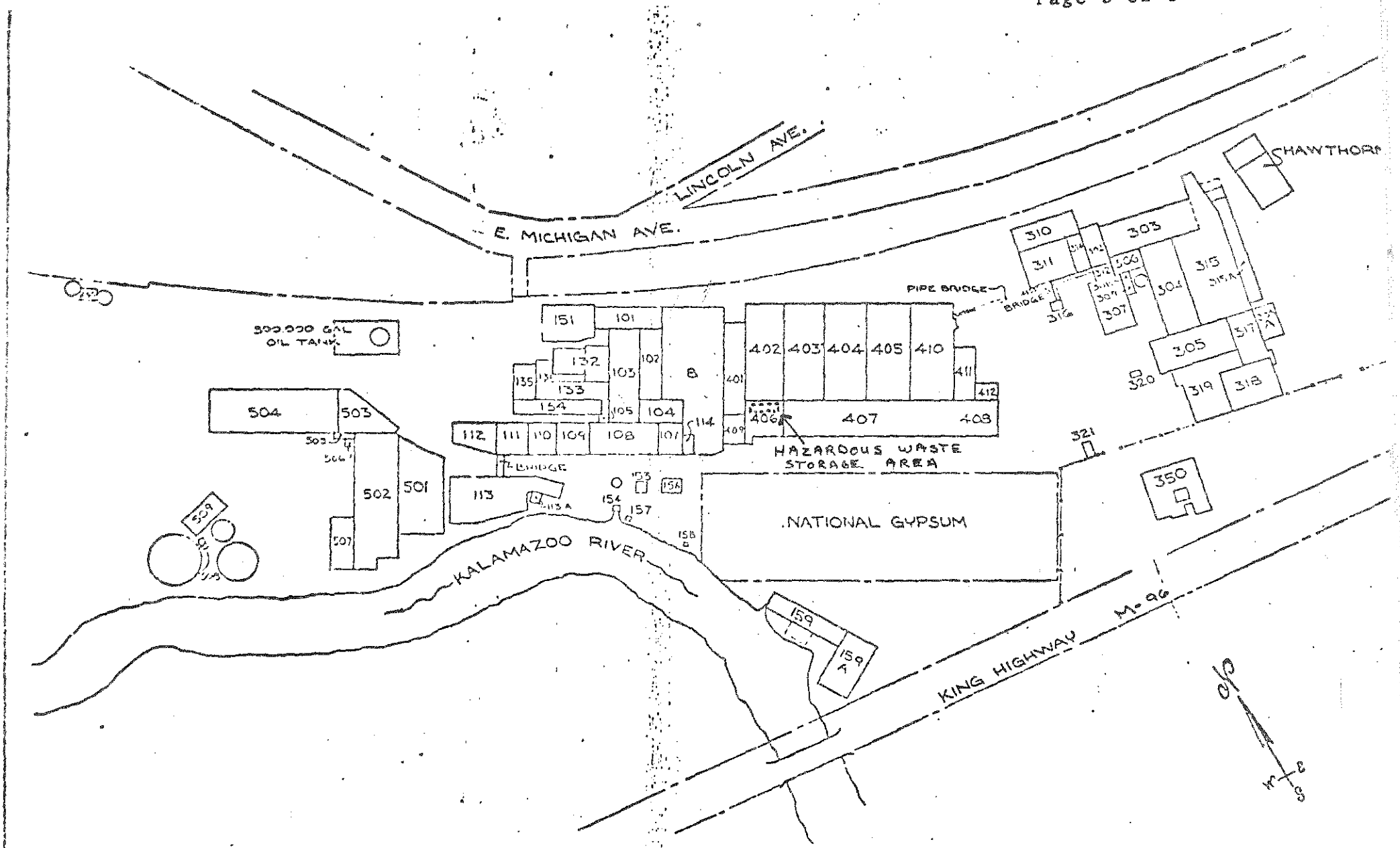
8. Required Reports and Records.

8.1 The operator will notify the EPA Regional Administrator and the State and Local authorities when those procedures specified in Section 4.4 have been implemented. This will occur prior to resumption of facility operations.

8.2 Within 15 days after the incident, the operator will submit to the EPA Regional Administrator and DNR a written report providing:

(1) The name, address and telephone number of the operator;
(2) The name, address and telephone number of the facility;
(3) The date, time and type of incident;
(4) The name and quantity of materials involved;
(5) The extent of injuries, if any;
(6) An assessment of actual or potential hazards to human health or the environment; and
(7) Estimated quantity and disposition of recovered material that resulted from the incident.

8.3 A copy of this contingency plan is maintained at the facility and is available to the Emergency Coordinator.



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SYM.	REVISION	DATE	BY	

GEORGIA-PACIFIC
KALAMAZOO PAPER DIVISION
KALAMAZOO, MICHIGAN

MILL MAP

AREA | ACCT. | DWG. NO.

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	[X]	storage in containers	I
S02	[ ]	storage in tanks	J
T01	[ ]	treatment in tanks	J
S04	[ ]	storage in surface impoundment	K,F
T02	[ ]	treatment in surface impoundment	K,F
D83	[ ]	disposal in surface impoundment	K,F
S03	[ ]	storage in waste pile	L
D81	[ ]	disposal by land application	M,F
D80	[ ]	disposal in landfill	N,F
T03	[ ]	treatment by incineration	O/P
T04	[ ]	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	[X]	APPENDIX	GN
TRANSPORTER	[ ]	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?				N/A
b. Facility expansion?				N/A
c. Change of owner or operator?				N/A
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?		✓		N/A company will do when necessary at the point their know prop of waste
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓			
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?				N/A
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	✓			
or				
b. i. Artificial or natural barrier around facility?				
and				
ii. Controlled entry?				
c. Danger sign(s) at entrance?	✓			
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	✓			

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	✓			
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?				N/A
ii. safety and emergency equipment?	✓			
iii. security devices?	✓			
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	✓			
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	✓			basically [illegible] have stored [illegible] — inspect [illegible]
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	✓			
d. Are areas subject to spills inspected daily when in use?	✓			
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	✓			
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	✓			
ii. the name of the inspector?	✓			
iii. a notation of the observations made?	✓			
iv. the date and nature of any repairs or remedial actions?	✓			
5. Do personnel training records include: 265.16				
a. Job titles?		✓		
b. Job descriptions?		✓		

	YES	NO	NI	Remarks
c. Description of training?		✓		have some information
d. Records of training?		✓		1/20/81 waste disposal in transportation skill waste mgmt
e. Did facility personnel receive the required training by 5-19-81?				
f. Do new personnel receive required training within six months?		✓		
g. Do personnel training records indicate that personnel have taken part in an annual review of initital training?		✓		
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	✓			
b. No smoking signs?	✓			
c. Separation and protection from ignition sources?	✓			

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

	YES	NO	NI	Remarks
.. Maintenance and Operation of Facility: 265.31				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
2. If required, does the facility have the following equipment: 265.32				
a. Internal communications or alarm systems?	✓			
b. Telephone or 2-way radios at the scene of operations?	✓			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

Kazoo River - unlimited supply

	YES	NO	NI	Remarks
3. Testing and Maintenance of Emergency Equipment: 265.33				
a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
b. Is emergency equipment maintained in operable condition?	✓			
4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	✓			
5. Is there adequate aisle space for unobstructed movement?	✓			
6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	✓			

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	✓			
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?		✓		
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	✓			
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)		✓		
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53		✓		Paul will send to Fire Dept.

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	✓			
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				no emergency to date

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	___	___	___	_____
b. Are records of past shipments retained for 3 years?	___	___	___	_____
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	___	___	___	_____
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	___	___	___	_____
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	___	___	___	_____
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)	___	___	___	_____
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

	YES	NO	NI	Remarks
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	___	___	___	_____
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	___	___	___	_____
v. Reports detailing all incidents that required implementation of the Contingency Plan?	___	___	___	_____
vi. All closure and post closure costs as applicable?	___	___	___	_____
4. Availability of Records 265.74				
Are all facility records required under 40 CFR Part 265 available for inspection?	___	___	___	_____
5.**Unmanifested Waste Reports 265.76				
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?	___	___	___	_____
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.	_____			

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

	YES	NO	NI	Remarks
1. Has the owner or operator of the facility implemented a groundwater monitoring system? 265.90	___	___	___	_____
If "no", Skip to number 11.				
2. Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)?	___	___	___	_____
If "yes", skip to number 12. If "no", continue				
3. Does the groundwater monitoring system meet the following requirements of 265.91:				
a. At least one well installed hydraulically up-gradient from the limit of the waste management area?	___	___	___	_____
Indicate the total number of up-gradient wells.				
b. At least three wells installed hydraulically down-gradient at the limit of the waste management area?	___	___	___	_____
Indicate the total number of downgradient wells.	_____			
c. Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?	___	___	___	_____

Sketch the locations of the wells relative to the waste management area.

	YES	NO	NI	Remarks
d. Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?	___	___	___	_____
4. Has the owner or operator developed a written groundwater sampling and analysis plan that includes procedures and techniques for: 265.92				
a. Sample collection?	___	___	___	_____
b. Sample preservation and shipment?	___	___	___	_____
c. Analytical procedures?	___	___	___	_____
d. Chain of custody control?	___	___	___	_____
5. Does the owner or operator follow his groundwater sampling and analysis plan?	___	___	___	_____
6. Is the groundwater sampling and analysis plan maintained at the facility?	___	___	___	_____
7. Has the owner or operator determined the concentration or value of all the groundwater monitoring parameters of 265.92(b) in accordance with paragraphs c and d of 265.92?	___	___	___	_____

	YES	NO	NI	Remarks
8. Has the owner or operator developed an outline of a comprehensive groundwater quality assesment program that is capable of determining: 265.93				
a. Whether hazardous waste or hazardous waste constituents have entered the groundwater?				
b. The rate and extent of migration of hazardous waste or hazardous waste constituents in the groundwater?				
c. The concentration of hazardous waste or hazardous waste constituents in the groundwater?				
*9. Has the owner or operator performed a statistical analysis of his groundwater monitoring data as required in 265.93(b)?			X	
*10. Was there a statistically significant increase (or pH decrease) detected in any well?			X	
a. If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?			X	
Skip to number 14				
11. Has the owner or operator prepared a written groundwater monitoring waiver demonstration for the facility?				
a. Is the waiver demonstration maintained at the facility?				
b. Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?				

Note: Inspectors should request a copy of the waiver document.

c. Skip questions 12, 13, and 14.

*These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

	YES	NO	NI	Remarks
12. Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?	___	___	___	_____
a. Has the plan been certified by a qualified geologist or geotechnical engineer?	___	___	___	_____

Note: If the plan for an alternate groundwater monitoring system was not submitted to the Regional Administrator the inspector should request a copy for review.

13. Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?	___	___	___	_____
14. Does the owner or operator submit reports and maintain records as required in 265.94?	___	___	___	_____

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				
a. Is the facility closure plan available for inspection?	✓			
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	✓			
ii. maximum hazardous waste inventory?	✓			
iv. estimated year of closure?				N/A
v. schedule of closure activities?		✓		
c. Has closure begun?		✓		
*2. Post-Closure 265.118				
a. Is the post-closure plan available for inspection?				N/A
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?				
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable				
BB. facility monitoring equipment				
iii. name, address, and phone number of person or office to contact during post-closure care period?				
c. Has the post-closure period begun?				
d. Is the written post-closure cost estimate available? 265.144				

*Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		YES	NO	NI	Remarks
1.	Are containers in good condition? 265.171	✓			
2.	Are containers compatible with waste in them? 265.172	✓			
3.	Are containers managed to prevent leaks? 265.173	✓			
4.	Are containers stored closed?	✓			
5.	Are containers inspected weekly for leaks and defects.		✓		bimonthly
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	✓			
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177				
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				

Section J - TANKS (Part 265, Subpart J)

	YES	NO	NI	Remarks
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	___	___	___	_____
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	___	___	___	_____
3. Do continuous feed systems have a waste-feed cutoff?	___	___	___	_____
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193	___	___	___	_____
5. Are required daily and weekly inspections done? 265.194	___	___	___	_____
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	___	___	___	_____
7. Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)	___	___	___	_____

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____gallons

Tank diameter: _____feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Section K - SURFACE IMPOUNDMENTS (Part 265, Subpart K)

	YES	NO	NI	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222	___	___	___	_____
2. Do earthen dikes have protective covers? 265.223	___	___	___	_____
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225	___	___	___	_____
4. Is the freeboard level inspected at least daily? 265.226	___	___	___	_____
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	___	___	___	_____
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229	___	___	___	_____
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230	___	___	___	_____

Section L - WASTE PILES (40 CFR Part 265, Subpart L)

	YES	NO	NI	Remarks
1. Are waste piles covered or protected from dispersal by wind? 265.251	___	___	___	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	___	___	___	_____
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253	___	___	___	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256	___	___	___	_____
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	___	___	___	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257	___	___	___	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	___	___	___	_____

Section M - LAND TREATMENT (Part 265, Subpart M)

	YES	NO	NI	Remarks
1. Is treated hazardous waste capable of biological or chemical degradation? 265.272	___	___	___	_____
2. Are run-off and run-on diverted from the facility or collected				
3. Is waste analyzed according to 265.273?	___	___	___	_____
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	___	___	___	_____
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278	___	___	___	_____
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	___	___	___	_____
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279	___	___	___	_____
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281	___	___	___	_____
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282	___	___	___	_____

Section N - LANDFILLS (Part 265, Subpart N)

	YES	NO	NI	Remarks
1. General Operating Requirements 265.302 Does the facility provide the following:				
a. Diversion of run-on away from active portions of the fill?	___	___	___	_____
b. Collection of run-off from active portions of the fill?	___	___	___	_____
c. Is collected run off treated?	___	___	___	_____
d. Control of wind dispersal of hazardous waste?	___	___	___	_____
2. Surveying and Recordkeeping 265.309 Does the Operating Record Include:				
a. A map showing the exact location and dimensions of each cell?	___	___	___	_____
b. The contents of each cell and the location of each hazardous waste type withing each cell?	___	___	___	_____
3. Special requirements for ignitable or reactive waste. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? (Indicate if waste is ignitable or reactive.) 265.312	___	___	___	_____
4. Special Requirements for Incompatible Wastes. 265.313 Does the owner or operator dispose of incompatible waste in separate cells? (If not, the provisions of 40 CFR 265.17(b) apply.)	___	___	___	_____

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

	YES	NO	NI	Remarks
Special requirements for liquid waste 265.314				
a. Are bulk or non-containerized liquids placed in the landfill? If "yes," complete items i, ii, and iii.				
i. Does the landfill have a chemically and physically resistant liner system?	___	___	___	_____
ii. Does the landfill have a functional leachate collection system?	___	___	___	_____
iii. Are free liquids stabilized prior to or immediately after placement in the landfill?	___	___	___	_____
b. Have containers holding free liquids been placed in landfill since March 22, 1982?	___	___	___	_____
6. Special requirements for Containers 265.315 Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	___	___	___	_____

Section O/P - INCINERATION AND THERMAL TREATMENT (40 CFR Part 265, Subparts O and P)

1. Determination of Steady State I=incinerator T=thermal

a. Type of unit (i.e., type of incinerator or thermal treatment): _____

b. Components and steady state condition: I 265.343 T 265.373

Was each component at steady state prior to adding waste?

Component	YES	NO	NI	Remarks

2. Waste Analysis I 265.345 T 265.375

a. Minimum requirements, for wastes not previously burned/treated.

i. Required analyses; has an analysis been performed for the following?

Heating value				
Halogen content				
Sulfur content				

ii. Has documented or written data been substituted for analysis of either:

Lead?				
Mercury:				

b. List other paramters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

	YES	NO	NI	Remarks
3. Monitoring and Inspections I 265.347 T 265.37				
a. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
b. Is steady state maintained or corrections attempted?	___	___	___	_____
c. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
d. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
e. If "yes" to (d) above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
f. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____

**Specify in Remarks for what period of time this was checked.

g. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

4. Open Burning T 265.382 (open burning does not apply to incineration)

a. Only complete this part if the facility open burns hazardous waste.

i. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned).	___	___	___	_____

	YES	NO	NI	Remarks
ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

	YES	NO	NI	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	___	___	___	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	___	___	___	_____
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	✓			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	0 haz waste			
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?				136 waste manifested properly
b. Name, mailing address, telephone number, and EPA ID number of Generator				
c. Name and EPA ID Number of Transporter(s)?				
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?				
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?				
f. The total quantity of waste(s) and the type and number of containers loaded?				
g. Required certification?				
h. Required signatures?				

(4) Reportable exceptions 262.42

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. _____

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	✓			
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	✓			
3. If required, are placards available to transporters of hazardous waste? 262.33				transporter ha

4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box ☒ and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision

	YES	NO	NI	Remarks
a. Is each container clearly marked with the start of accumulation date?				
b. Have more than 90 days elapsed since the date inspected in (a)?				
c. Do wastes remain in accumulation tanks for more than 90 days?				
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?				

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	✓			

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

	YES	NO	NI	Remarks
1. Has the installation imported or exported Hazardous Waste? 262.50		✓		

(If answered Yes, complete the following as applicable.)

a. Exporting Hazardous waste; has a generator:

	YES	NO	NI	Remarks
i. Notified the Administrator in writing?	___	___	___	_____
ii. Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?	___	___	___	_____
iii. Met the Manifest requirements?	___	___	___	_____
b. Importing Hazardous Waste; has the generator met the manifest requirements?	___	___	___	_____

Section A: SCOPE:	YES	NO	NI	Remarks
1. Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.	___	___	___	_____
2. Does the transporter transport hazardous waste into the U.S. from abroad?	___	___	___	_____
3. Does the transporter transport hazardous waste out from the U.S.?	___	___	___	_____
4. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	_____

Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 263, Subpart B)				
1. Are copies of completed manifests available for review and retained for three years. 263.22	___	___	___	_____
2. Estimate the number of manifests for shipments completed during the part 6 months.	_____			
3. Examine a representative number of manifests. Indicate number examined.	_____			
4. Did transporter properly sign and date the manifests examined?	___	___	___	_____
5. Do any manifests indicate shipments delivered to other than the designated facility? 263.21	___	___	___	_____
If (5) is "no," skip 6 and 7.	___	___	___	_____
6. Do any manifests indicate shipments delivered to other than an alternate facility?	___	___	___	_____
7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?	___	___	___	_____

Corrective Action

Determination: NFA

PA/VSI Or RFA FILE REVIEW CHECKLIST

Facility Name: Georgia-Pacific Corporation_____

EPA ID: MID 042 441 022 _____ City: Kalamazoo_____ State: MI__

Name of Reviewer: Maureen McHugh_____ Date of Review: //08_____

1	Yes	No	Is this a one folder site?
2	Yes	No	Are there Superfund files for this site?
3	Yes	No	Did you Read the Executive Summary?
			There are: __13__ SWMUs and __3___ AOCs at this site.
4	Yes	No	Did you review the regulatory history?
5	Yes	No	Does the facility have interim status or a permit?
			This facility is a: ___X_ SQG, _____ LQG, or ____ Less than 90 day.
6	Yes	No	Was the Facility closed per RCRA? RCRAInfo 380 (1986)
			If Yes, was the closure: _X___ CC, or _____ CIP.
7	Yes	No	Are there documented (historical) releases? Briefly describe on Page 2.
8	Yes	No	Were there releases identified during the inspection? Briefly describe on Page 2.
9	Yes	No	Do you agree with the Conclusions and Recommendations?
			If No, briefly describe on Page 2.

As a result of your review of the PA/VSI or RFA file, please classify this site as:

_X____No further corrective action recommended or warranted: These are sites that closed the regulated units and any other SWMUs or AOCs at the site did not warrant any further corrective action (no historic releases or evidence of releases observed during the Visual Site Inspection).

_____ Further Action Required: Soil or sediment sampling or groundwater sampling or monitoring or any type of investigation that was recommended in the report in response to a documented or observed release at any SWMU or AOC and where such investigation, whether being addressed during the inspection or after, does not have the necessary documentation in the facility record files.

_____ More Information Needed: There is no RFA, PA/VSI or RCRA closure information available.

YE

RECEIVED OCT 13 1993

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Mary Wojciechowski
Date: August 21, 1992

RELEASED 2/4/99
DATE
RIN # 866-99
INITIALS MV

ORIGINAL CONFIDENTIAL

Background Facility Information

Facility Name: Georgia Pacific Corporation
EPA Identification No.: MID 042 441 022
Location (City, State): Kalamazoo, Michigan
Facility Priority Rank: High

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

Entire facility
13 SWMUs
3 AOCs

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

( ) No corrective action activities initiated (Go to 5)
(X) RCRA Facility Assessment (RFA) or equivalent completed
( ) RCRA Facility Investigation (RFI) underway
( ) RFI completed
( ) Corrective Measures Study (CMS) completed
( ) Corrective Measures Implementation (CMI) begun or completed
( ) Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

( ) Operating permit
( ) Post-closure permit
(X) Enforcement order
( ) Other (Explain)

Some corrective actions were done under a 1990 Administrative Order of Consent from MDNR. Others were voluntary.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

( ) Yes
( ) No
(X) Uncertain; still underway
( ) Not required

Additional explanatory notes:

A remedial investigation work plan is being developed pursuant to the Administrative Order.

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

(X) Ground water
(X) Surface water
( ) Air
(X) Soils

6. Are contaminant releases migrating off-site?

( ) Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater: _____
Surface water: _____
Air: _____
Soils: _____

( ) No
(X) Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

( ) Yes (Go to 8a)
( ) No
(X) Uncertain

Additional explanatory notes:

It is not known if contaminants have migrated off site

7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

(X) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

In the area the facility ground water is used as drinking water and surface water is used for recreation.

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

( ) Yes (Go to 9)
( ) No
(X) Uncertain

Additional explanatory notes:

It is not known if contaminants have migrated off site.

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

(X) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

In the area the facility ground water is used as drinking water and surface water is used for recreation.

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

Final corrective measures have not been identified or planned. Further investigation is necessary.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

(X) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

Facility is awaiting MDNR approval of a proposed stabilization for one on site landfill that has significant PCB and dioxin contamination.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

(X) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

One on site landfill appears to be releasing a significant amount of PCBs into the Kalamazoo River which is used for recreational purposes.

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

( ) Solid
(X) Light non-aqueous phase liquids (LNAPLs)
(X) Dense non-aqueous phase liquids (DNAPLs)
(X) Dissolved in ground water or surface water
( ) Gaseous
( ) Other _____

13. Which of the following major chemical groupings are of concern at the facility?

(X) Volatile organic compounds (VOCs) and/or semi-volatiles
( ) Polynuclear aromatics (PAHs)
( ) Pesticides
(X) Polychlorinated biphenyls (PCBs) and/or dioxins
( ) Other organics
(X) Inorganics and metals
( ) Explosives
( ) Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

(X) Yes; Indicate possible course of action.

The facility has proposed a fabric formed concrete cover and pilings along the riverbank to prevent contaminant migration. Further investigation is needed in other areas which may need stabilization.

( ) No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

( ) Yes
(X) No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

(X) Yes
( ) No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

( ) Yes
( ) No
(X) Uncertain

Additional explanatory notes:

Stabilization has been proposed for one area but further investigation of other areas that may need stabilization is necessary.

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

( ) Yes
( ) No
(C) Uncertain

Additional explanatory notes:

Stabilization has been proposed for one area but further investigation of other areas that may need stabilization is necessary.

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

(X) Yes
( ) No, not feasible
( ) No, not required
(X) Further investigation necessary

Explain final decision, using additional sheets if necessary.

This facility is a PRP associated with the National Priorities List Portage Creek/Kalamazoo River Superfund Site.
Releases of dioxins and PCBs have been confirmed from one former landfill and the facility is awaiting MDNRs approval on a stabilization proposal.
Other areas where PCBs, VOCs and ammonium hydroxide have been released to soil and a ground water need further investigation.
The facility is in the process of preparing a Remedial Investigation work plan pursuant to a 1990 Administrative Order of Consent by MDNR.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

December 30, 1993

RECEIVED JAN 25 1994
WMD RCRA
RECORD CENTER

Mr. Philipp Hester
Georgia-Pacific Corporation
2426 King Highway
Kalamazoo, MI 49001

Re: Visual Site Inspection
Georgia-Pacific Corporation
Kalamazoo, Michigan
MID 042 441 022

Dear Mr. Hester:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

November 6, 1991

REPLY TO ATTENTION OF: 5HR-12

Phil Hester
Georgia Pacific Corporation
2425 King Highway
Kalamazoo, MI 49001

Re: Visual Site Inspection
Georgia Pacific Corporation
2425 King Highway
MID 042 441 022

Dear Mr. Hester:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site visit, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site visit is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of units at the facility and the waste management practices used.

The VSI has been scheduled for November 13, 1991. The inspection team will consist of Russ Crittenden and Valerie Farrell of Dynamac Corporation, contractors for the U.S. EPA. Representatives of the Michigan Department of Natural Resources may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

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The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams. hydrogeologic reports, environmental assessment reports, sampling data sheets, manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion, may be made available upon request.

Sincerely yours,

Sheri L. Bianchin

for Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

cc: Ken Burda, Permit Section, MDNR
Dennis Drake, Compliance and Enforcement Section, MDNR

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

prc
PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

GEORGIA-PACIFIC CORPORATION
KALAMAZOO, MI 49001
MID 042 441 022

FINAL REPORT

Prepared for:

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	MID 042 441 022
Date Prepared	:	March 18, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087-MI2N
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
Prepared By	:	Dynamac Corporation
	:	(Russ Crittenden)
Telephone No.	:	(312) 466-0222
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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RELEA...
DATE 2/4/99
RIN # 8/06-99
INITIALS MU

EXECUTIVE SUMMARY

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Dynamac Corporation (Dynamac) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Georgia-Pacific Corporation (GPC) facility, located in Kalamazoo, Michigan. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

GPC is a paper manufacturing facility located in an industrial area on the Kalamazoo River in the City of Kalamazoo and Kalamazoo Township, Michigan. The GPC facility occupies approximately 100 acres, consisting of the Mill Property, King Highway Landfill, Willow Boulevard Landfill, and 'A' Landfill areas. The facility produces paper from purchased virgin and recycled pulp. GPC does not have a pulping operation. Under a series of owners, the facility has been in operation at this location since 1892.

The facility normally generates three hazardous waste streams and eight nonhazardous waste streams. Hazardous wastes generated at the facility include paint waste (D001), paint thinner waste containing ethyl ether and methanol (D001, F003, F005), and waste petroleum naphtha (D001). Nonhazardous wastes generated at the facility include process wastewater, solid rejects, scrap metal, residuals, empty drums, waste oil, coal ash, and municipal wastes. In addition, the facility occasionally disposes of a variety of unused process and laboratory chemicals which may be hazardous or nonhazardous, and polychlorinated biphenyl (PCB)-containing special waste from retrofilling of PCB transformers.

The facility submitted a RCRA Part A Permit Application for container storage of hazardous waste, and maintained an Interim Status hazardous waste storage unit from 1983 until 1985. GPC has operated as a generator since undergoing Michigan Department of Natural Resources (MDNR)-approved RCRA closure in 1985.

The PA/VSI identified the following 13 SWMUs and 3 AOCs at the GPC facility:

Solid Waste Management Units

1 Hazardous Waste Drum Storage Area
2 Nonhazardous Waste Drum Storage Area
3 Paint Thinner Waste Satellite Accumulation Drum
4 Wastewater Treatment Plant and Dewatering Presses
5 King Highway Landfill
6 Willow Boulevard Landfill
7 'A' Landfill

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INITIALS MU

Solid Waste Management Units (continued)

8 Rejected Material Collection System
9 Scrap Metal Collection System
10 Portable Waste Oil Tanks
11 1,000-Gallon Waste Oil Aboveground Storage Tank
12 Empty Drum Crushing and Disposal Area
13 Coal Ash Baghouses and Storage Silo

Areas of Concern

1 Fuel Oil and No. 6 Residual Fuel Oil Underground Storage Tank Area
2 Gasoline Underground Storage Tank Area
3 Ammonium Hydroxide Underground Storage Tank Area

There have been several types of historical releases from the facility, including releases from landfills, releases from underground storage tanks (USTs), process water releases, and chemical spills. These releases affected soils, groundwater and/or surface water. There have been no documented releases to the air from the facility.

The three landfills (King Highway, Willow Boulevard, and 'A' Landfills) (SWMU Nos. 5, 6, and 7, respectively) at the facility are located adjacent to the Kalamazoo River and have released PCBs to soils, groundwater, and surface water. During the 1950s and 1960s, the facility accepted waste carbonless copy paper for recycling. This paper contained PCBs, and in the process of de-inking, pulping and making paper, the facility produced PCB-containing effluent from its wastewater treatment plant. Solids contained in this effluent were dewatered in residual lagoons which are now the King Highway Landfill (SWMU No. 5). Lagoons formerly owned by Allied Paper Company and later acquired by GPC and operated by GPC as the 'A' Landfill (SWMU No. 7) also accepted PCB-contaminated residuals during this period. The former lagoons which are now landfills were not lined and PCBs have been released to soils and groundwater. GPC also excavated dewatered residuals from King Highway lagoons and disposed of them at the unlined Willow Boulevard (SWMU No. 6) and 'A' Landfills (SWMU No. 7). This segment of the Kalamazoo River is a part of the National Priorities List Portage Creek/Kalamazoo River (PC/KR) Superfund site and GPC is one of three potentially responsible parties (PRP) associated with the Site. GPC is currently participating in the development of a Remedial Investigation Workplan for this Site pursuant to an Administrative Order on Consent GPC signed with MDNR in December 1990.

The USTs removed from the AOCs at the facility leaked petroleum products and ammonium hydroxide to surrounding soils and groundwater. GPC excavated some contaminated soils during the UST removals, but contaminated soils still remain. GPC installed monitoring wells near [redacted] but has

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INITIALS MV

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observed no groundwater contamination in samples collected from the wells. No groundwater monitoring has been conducted at the Ammonium Hydroxide Underground Storage Tank Area (AOC No. 3).

The facility has a National Pollutant Discharge Elimination System Permit for discharge of noncontact cooling water to the Kalamazoo River. Process wastewater is treated at the facility wastewater treatment plant (WWTP) to remove paper residuals. The WWTP and associated sludge dewatering presses are designated SWMU No. 4. GPC discharges the treated wastewater to the Kalamazoo Water Reclamation Plant. Excess water is removed from the residuals in the dewatering presses, and is hauled to GPC's King Highway Landfill. There were occasional releases of untreated process wastewater from the paper machines to the river in the 1980s, but the outfalls were altered in 1988 to prevent future occurrences.

There have also been two documented releases of process chemicals from the facility due to spills in the receiving area. One of these spills, consisting of 30 gallons of sodium bisulfite, entered the Kalamazoo River. There was also a release of approximately five pounds of nonhazardous dewatered residuals from a truck to the river. Dynamac observed releases of nonhazardous oil to the cracked concrete pad around the 1,000-Gallon Waste Oil Aboveground Storage Tank (AST) (SWMU No. 11), and a release of nonhazardous dewatered residuals to soils around the facility WWTP (SWMU No. 4).

The potential for releases of wastes to soil is high from SWMU No. 11 because there is an extensive area of spillage on the cracked concrete pad around the 1,000-Gallon Waste Oil AST. The potential for releases to soil is moderate from SWMU No. 14 due to the possibility that paper and other materials could be blown by the wind. There are documented releases to soils from SWMU Nos. 4, 5, 6, and 7, and also from all three AOCs. The potential for release to soils from the other SWMUs is low.

The potential for releases to groundwater is high from SWMU Nos. 5 and 11. PCB-contaminated soils are present in King Highway Landfill, and oil spilled from the 1,000-Gallon Waste Oil AST may penetrate the cracked concrete pad and percolate through the soil to groundwater. The potential for releases to groundwater is high from AOC Nos. 1, 2, and 3 because contaminated soils are present in these areas and the water table is close to the ground surface. Releases to groundwater have been documented from SWMU Nos. 6 and 7. The potential for release to groundwater from all other SWMUs is low.

The potential for a release to surface water is high from SWMU No. 7 because the landfill contains unvegetated patches that may erode into the adjacent Kalamazoo River. There are documented releases of PCBs to surface water from SWMU Nos. 5 and 6. The potential for releases to surface water from SWMU No. 14 is moderate due to the possibility that paper and other materials could be blown by the wind. The potential for releases to surface water from the other SWMUs and AOCs is low.

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DATE 8/4/99
RIN # 866-99
INITIALS MV

ENFORCEMENT
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The potential for release to air from SWMU No. 11 is high because the spilled oil near the 1,000-Gallon Waste Oil AST may contain volatile constituents. The potential for release to air from the other SWMUs and AOCs is low.

The area surrounding GPC is mixed industrial and residential. The facility is divided into two parts by the Kalamazoo River, with the Mill Property lying north of the river and the three landfills lying south of the river. Residences are located immediately south of the landfills. Area residents are supplied with municipal water from groundwater wells. The nearest municipal well is located approximately Non responsive [redacted] of the facility, and draws from the lower of two glacial aquifers. Groundwater flow at the facility is generally towards the Kalamazoo River; however, the municipal well's cone of depression may influence groundwater flow at the facility. There are no known wells downgradient from the facility.

The Kalamazoo River flows along the north boundary of the facility landfills and is used for recreational boating, fishing and swimming. The nearest sensitive environment is a wetland located one-quarter of a mile north of the GPC facility. Access to the landfill portions of the facility is restricted by fencing and locked gates except on the river frontage where access could be gained by boaters. Access to the Mill Property is controlled on all sides by fencing, locked gates, and 24-hour manned security.

Dynamac recommends several courses of action at some of the GPC SWMUs and AOCs. Dynamac recommends containment of spills at the facility WWTP (SWMU No. 4) and cleanup of oil spilled near the 1,000-Gallon Waste Oil Above Ground Storage Tank (SWMU No. 11). Dynamac recommends that GPC continue to monitor groundwater for PCBs at each landfill (SWMU Nos. 5, 6, and 7), and continue to monitor groundwater for petroleum hydrocarbons and aromatic compounds at the UST areas (AOC Nos. 1 and 2). Dynamac further recommends that GPC continue to pursue formal closure at the Willow Boulevard Landfill (SWMU No. 6), attempt to vegetate the bare areas on the 'A' Landfill (SWMU No. 7), and develop remediation plans for the remaining PCB-contaminated soils in SWMU Nos. 5 and 7. Finally, Dynamac recommends that GPC investigate possible groundwater contamination from leaking product at the Ammonium Hydroxide Underground Storage Tank Area (AOC No. 3).

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in EPA Region 5. PRC assigned Dynamac Corporation (Dynamac), its TES 9 subcontractor, to conduct the PA/VSI for the Georgia-Pacific Corporation (GPC) facility in Kalamazoo, Michigan.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells

- Closed and abandoned units

- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units

- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a non-routine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents in files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of the PA/VSI of the GPC facility in Kalamazoo, Michigan, RCRA ID No. MID 042 441 022. Dynamac gathered and reviewed information from files at the Waste Management, Air Quality, Surface Water Quality, and Emergency Response Divisions of the Michigan Department of Natural Resources' (MDNR) Plainwell, Michigan District office and from EPA Region 5 RCRA files.

Russ Crittenden and Valerie Farrell of Dynamac conducted the VSI on November 13, 1991. The VSI included an interview with several GPC employees including Al Campbell, Maintenance and Environmental Engineer; Al Beshire, Corporate Engineer; and Phil Hester, Environmental Engineer. The VSI also included a walk-through inspection of the facility. Dynamac observed fourteen SWMUs and three AOCs during the VSI.

Dynamac completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized along with 22 inspection photographs in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The GPC facility is a paper manufacturing facility located in a mixed industrial and residential area adjacent to the Kalamazoo River. The facility is located approximately two miles east of the downtown area of the city of Kalamazoo, in Kalamazoo County, Michigan (42° 17' 10" north latitude; 85° 33' 0" west longitude (USGS, 1967)) (See Figure 1).

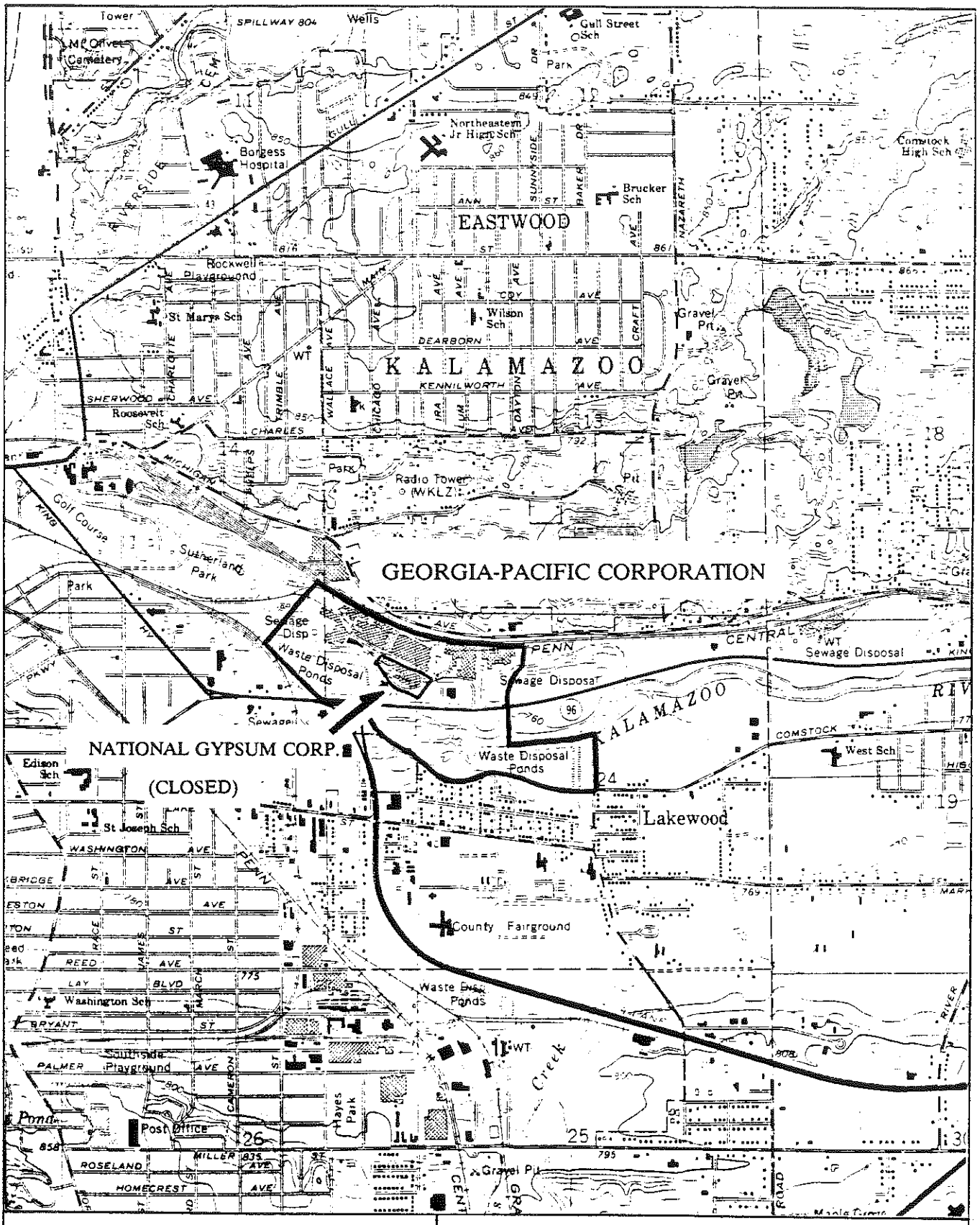
The GPC facility has four contiguous sections: the Mill Property, the King Highway Landfill, the Willow Boulevard Landfill, and the 'A' Landfill. The Kalamazoo River divides the facility so that the Mill Property is located north of the river, and the landfills are located south of the river. The total facility property covers approximately 100 acres (GPC, 1991c). A closed National Gypsum Corporation facility is located immediately adjacent to GPC, south of the Mill Property (See Figure 2). Access to the GPC Mill Property and to the King Highway Landfill is from King Highway. Access to the other landfills is from Willow Boulevard.

2.2 FACILITY OPERATIONS

The GPC facility produces Form Bond, Uncoated Offset, and Matte Coated Offset grades of paper (GPC, undated (a)). The facility uses purchased virgin pulp and also recycles wastepaper in its operations. GPC does not currently produce pulp from wood. The facility currently operates 2 shifts per day and employs approximately 300 persons. Total production is approximately 370 tons of paper per day (GPC, 1991c).

The first paper mill at this location was constructed by the Botsford Paper Company (Botsford) in 1892. Several other companies opened mills next to the Botsford mill in subsequent years, and in 1918 a total of five existing mills were consolidated under the Kalamazoo Paper Company name. Three of these mills remain today on the GPC facility. In the 1930s, the Kalamazoo Paper Company began to accept waste paper as a source of pulp (GPC, undated (b)). The original paper mills at the facility produced pulp from wood; the facility abandoned this process and began to purchase pulp at some time prior to 1967.

GPC purchased the Kalamazoo Paper Company facility, which included the King Highway and Willow Boulevard areas, in 1967. GPC purchased sludge lagoons belonging to the Allied Paper Company when that company closed in 1975 (GPC, 1991c). GPC calls this former lagoon area the 'A' Landfill.



NORTH

SCALE = 1 : 24,000
SOURCE: USGS, 1967

FIGURE 1
FACILITY LOCATION
GEORGIA-PACIFIC CORPORATION

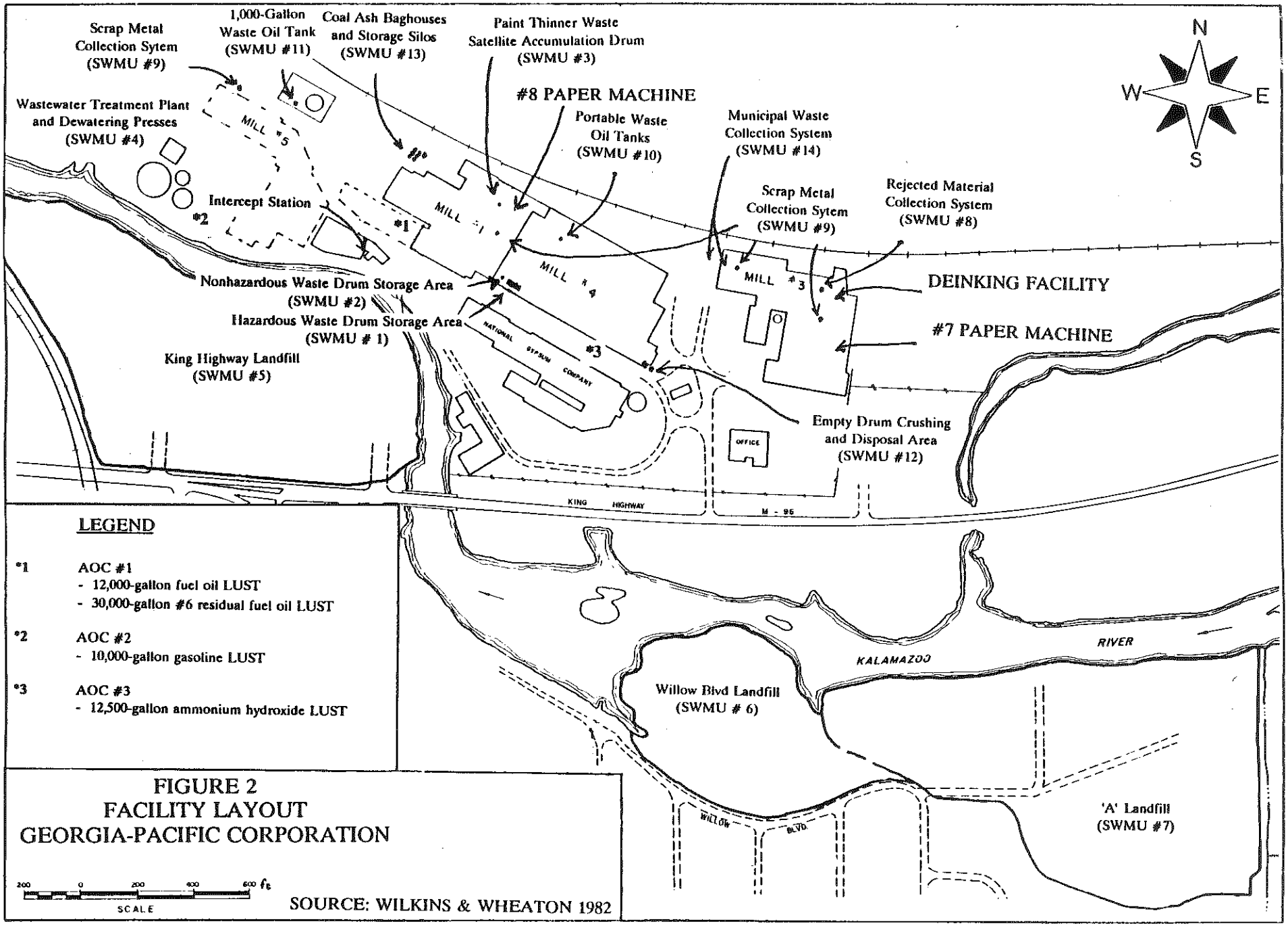


FIGURE 2
FACILITY LAYOUT
GEORGIA-PACIFIC CORPORATION

SOURCE: WILKINS & WHEATON 1982

Currently, the GPC facility produces paper on two machines located in Mill Nos. 3 and 4. The de-inking of wastepaper for recycling occurs in Mill No. 3, and the resulting pulp is mixed with purchased virgin pulp for use in the paper machines. GPC manufactures paper in varying grades containing up to 50 percent recycled pulp (GPC, 1991c).

Manufacturing processes include: pulping, screening, cleaning, de-inking and bleaching of wastepaper; liquefying and blending of virgin pulp; refining, adding fillers, adding coatings, and dyeing of pulp blends; paper forming, drying, sizing, and calendaring; and rolling, cutting, packaging, and shipping the finished paper. Biocides such as methylene bis(thiocyanate) are added to prevent slime and bacteria in the pulp and paper. An on-site laboratory tests paper and runs trials of process innovations (GPC, 1991c). Regular facility maintenance of buildings, machines, and vehicles is also an ongoing process. These processes are described in detail in Section 2.3.

Wastes generated as a result of these processes include process wastewater, unused or expired hazardous and nonhazardous process chemicals, and various nonhazardous solid wastes left over from the use of raw materials (paper residuals, scrap metal, miscellaneous municipal wastes). Waste residuals are generated at the facility wastewater treatment plant (WWTP), which treats all process wastewater prior to discharge to the Kalamazoo Water Reclamation Plant (KWRP). GPC is in the process of retrofilling all of the polychlorinated biphenyl (PCB) containing transformers at the facility, thus generating PCB-containing wastes. Additionally, nonhazardous waste oils, and hazardous paint waste (D001) and paint thinner waste (D001, F003, F005) are generated during routine facility and vehicle maintenance (GPC, 1991c).

Descriptions of the SWMUs identified during the PA/VSI are provided in Table 1. Figure 2 illustrates the Mill Property and landfill area layout and shows the location and number of all SWMUs, AOCs, and the location of all past and present underground storage tanks (UST).

2.3 WASTE GENERATING PROCESSES

GPC manufactures pulp made from recycled waste paper, and blends this with purchased virgin pulp to produce several varieties of finished paper (GPC, 1991c). Table 2 lists the solid wastes associated with the waste generating processes as well as those wastes introduced during routine facility and vehicle maintenance. Figure 3 shows a schematic diagram of the de-inking and recycling process, and paper making.

Historical wastestreams from the waste generating processes include solid rejects from the recycling process; scrap metal; municipal wastes; paint wastes (D001) and paint thinner wastes (unknown constituents); waste oil accumulated from facility maintenance; empty drums; unused or expired laboratory chemicals; unused or expired process chemicals including biocides, oxidizers, dispersants, bleaches, caustics, and acids (unknown composition); process wastewater; residuals from the wastewater; coal ash from the boiler

TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)
GEORGIA-PACIFIC CORPORATION FACILITY

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1.	Hazardous Waste Drum Storage Area	Yes	RCRA closed, 1985; Active for <90-day storage
2.	Nonhazardous Waste Drum Storage Area	No	Active
3.	Paint Thinner Waste Satellite Accumulation Drum	No	Active
4.	WWTP and Dewatering Presses	No	Active
5.	King Highway Landfill	No	Active
6.	Willow Boulevard Landfill	No	Inactive
7.	'A' Landfill	No	Inactive
8.	Rejected Material Collection System	No	Active
9.	Scrap Metal Collection System	No	Active
10.	Portable Waste Oil Tanks	No	Active
11.	1,000-Gallon Waste Oil Aboveground Storage Tank (AST)	No	Active
12.	Empty Drum Crushing and Disposal Area	No	Active
13.	Coal Ash Baghouses and Storage Silo	No	Active

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.

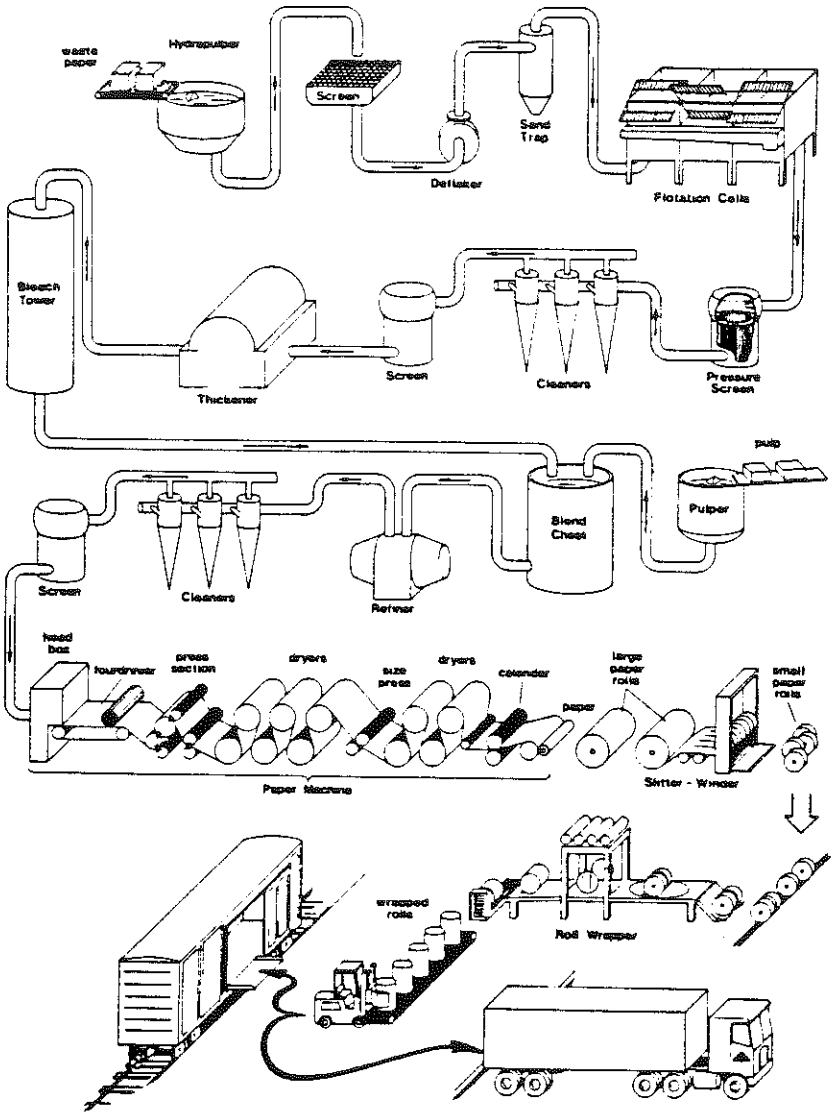
TABLE 2
SOLID WASTES
GEORGIA-PACIFIC CORPORATION FACILITY

Waste/EPA Waste Code	Source	Primary Management Unit*
Process Wastewater	De-inking and Paper Production	4
Solid Rejects	De-inking and Recycling	8, 14
Scrap Metal	Recycling and Scrap Parts	9
Residuals	WWTP	5 (** 6, 7)
Unused or Expired Process Chemicals	De-inking and Paper Production	1, 2
Unused or Expired Laboratory Chemicals	Paper and Process Testing	1, 2
Empty Drums	De-inking and Paper Production	12
Waste Oil	Facility and Vehicle Maintenance	10, 11
PCB-Containing Wastes	Facility Maintenance	1
Paint Waste (D001)	Facility Maintenance	1
Paint Thinner Waste (D001, F003, F005)	Facility Maintenance	3,1
Waste Petroleum Naphtha (D001)	Facility Maintenance	None***
Coal Ash	Plant Boiler	13

* Primary Management Unit refers to the SWMU that currently manages or formerly managed the waste.

** SWMU Nos. 6 and 7 are landfill areas which no longer accept residuals wastes.

*** Waste Petroleum Naphtha is generated in Safety-Kleen parts cleaners and is handled by Safety-Kleen upon generation.



General diagram of Mill Processes at G-P Kalamazoo

SOURCE: GPC, no date

FIGURE 3
FACILITY PROCESS DIAGRAM
GEORGIA-PACIFIC CORPORATION

house; and boiler house non-contact cooling water (GPC, 1991c). Dynamac does not have documentation of the waste streams resulting from discontinued pulping operations.

According to the Notification of Hazardous Waste Activity (EPA Form 8700-12) filed by GPC in 1980, GPC also generated various chemical wastes including the following: cyanide-containing quenching bath oils (F010); auramine (U014); formaldehyde (U122); arsenic trioxide (P012); carbon disulfide (P022); potassium cyanide (P098); sodium azide (P105); and sodium cyanide (P106) (GPC, 1980a). GPC personnel stated during the VSI that they did not know exactly how these wastes were generated, but speculated that some may have been constituents in discarded dyes and laboratory chemicals (GPC, 1991c).

All of the aforementioned historical wastestreams are currently generated at GPC with the exception of formaldehyde, quenching bath oils, auramine, arsenic trioxide, and carbon disulfide. GPC routinely generates waste petroleum naphtha (D001), paint waste (D001), and paint thinner waste containing ethyl ether and methanol (D001, F003, F005). GPC has also recently generated old stockpiled chemicals, including waste reactive cyanide (D003); waste oxidizer containing arsenic, cadmium, and silver (D001, D004, D006, D011); waste poisons containing lead, mercury, and 2,4-dinitrotoluene (D007, D009, D030); waste hydrochloric acid (D002); and waste chlorine (D003). These wastes were generated in one-time housekeeping events. The facility also generates PCB-containing wastes from retro-filling of transformers (GPC, 1991c).

Air emissions occur primarily through the boiler house stack, but three facility Safety-Kleen parts washers constitute small emission sources. Additionally, GPC is awaiting renewal of a National Pollutant Discharge Elimination System (NPDES) permit (No. MI0006190) to discharge non-contact cooling water from the boiler house through two outfalls to the Kalamazoo River. Effluent from the facility WWTP is discharged to KWRP (GPC, 1991c). The manufacturing, wastewater treatment, and maintenance operations mentioned in Section 2.2 that generate waste are described in greater detail below.

De-inking and Recycling Process

The de-inking and recycling process recovers pulp from wastepaper for use in new paper products. GPC de-inks and recycles waste paper in Mill # 3. In this process, bales of waste paper are put into a "Hydropulper" which mixes the waste paper with water, sodium hydroxide to break up ink, and a fatty acid dispersing agent. The resulting pulp goes through several stages of screening, cleaning, and trapping to remove plastic, tape, staples, large chunks, and other solid rejects. Flotation cells capture the ink in a froth which is scraped off and discharged to the facility WWTP. GPC uses peroxide and sodium hydrosulfite to brighten the pulp. Methylene bis(thiocyanate) is added during this process to prevent slime and bacteria build-up (GPC, 1991c).

Scrap metal is generated from the metal bands that hold together the bundles of wastepaper that are received daily. According to GPC personnel, the scrap metal is sometimes accumulated in a one-cubic-yard steel hopper which is a component of the Scrap Metal Collection System (SWMU No. 9). When the hopper becomes full, GPC combines it with other scrap metal generated at the facility and transports the metal off-site for recycling. At other times the scrap metal bands are combined with other unusable material included with the wastepaper and discarded as municipal waste. GPC does not know the quantity of scrap metal bands they generate; however, the total scrap metal generation rate from all sources is approximately 400,000 pounds per year (GPC, 1991c).

Solid rejects from the screening of pulp are collected in a one-cubic-yard hopper, which is a component of the Rejected Material Collection System (SWMU No. 8). Small solid rejects taken from the sand traps are accumulated in a lined fiber barrel, which is also a component of the Rejected Material Collection System (SWMU No. 8). All solid rejects are discarded as municipal waste. The facility generates approximately three cubic yards of solid rejects from the screen hopper per week, and approximately 10 pounds of solid rejects from the sand traps per day (GPC, 1991c).

Ink and other solids removed from the pulp after the initial screening and trapping are directed via the floor sewer to the facility WWTP and Dewatering Presses (SWMU No. 4). The process wastewater generated from this process also contains clays, sodium hydroxide, other chemicals added during the process, and various unknown constituents that are present in the waste paper (GPC, 1991c).

Unused and expired process chemicals are occasionally discarded, and these are accumulated in drums in the Hazardous Waste Drum Storage Area (SWMU No. 1) or the Nonhazardous Waste Drum Storage Area (SWMU No. 2). See the following Subsection, Papermaking Process, for information on wastes generated as unused or expired chemicals.

Papermaking Process

GPC purchases virgin pulp in bales bound by wire, and prepares the pulp for use by blending it with water and pulp from the de-inking plant. The operators add clay fillers, dyes and/or coatings as necessary. The facility uses ammonium hydroxide to adjust the pH of the coatings. GPC then further refines, cleans, and screens the blended pulp. The pulp is discharged from a head box onto a rapidly moving mesh wire. The paper machine removes water from the paper by drainage, pressure, and heat drying between steam-heated rollers. GPC finishes the paper by starching, calendaring (pressure smoothing), cutting, and rolling (GPC, 1991c).

The wire used to hold together the pulp bales is collected in one-cubic-yard rolling bins, which are components of the Scrap Metal Collection System (SWMU No. 9), for off-site recycling. GPC generated approximately 200,000 pounds of pulp bale wire per year (GPC, 1991c).

Fibers and other solids removed from the blended pulp are directed via sewer to the facility WWTP and Dewatering Presses (SWMU No. 4). The process water used in paper making is recycled through the system as much as possible before being pumped to the facility WWTP and Dewatering Presses. The wastewater contains clays, fibers, biocides, and other chemicals added during the process. The water may also contain a small amount of oil which leaks from the paper machines and is captured by the floor drains (GPC, 1991c).

Unused and expired process chemicals are occasionally discarded. These are accumulated in drums in the Hazardous Waste Drum Storage Area (SWMU No. 1) or the Nonhazardous Waste Drum Storage Area (SWMU No. 2). During the VSI Dynamac observed two 55-gallon drums of waste ammonium hydroxide from Ph adjustment of coatings in SWMU No. 2.

GPC has a small laboratory at the facility which tests finished paper and also develops improvements in the process which may involve testing of new chemical products. The laboratory also occasionally discards unused or expired chemicals which are stored in SWMU No. 1 or SWMU No. 2 to await transport (GPC, 1991c). In the first 10 months of 1991, GPC shipped the following hazardous wastes generated as unused or expired process and laboratory chemicals (GPC, 1991c):

Waste cyanide (D003)	4 lbs
Waste charcoal (D001)	90 lbs
Waste oxidizer (D001, D004, D006, D011)	8 lbs
Waste poison (D007, D030)	10 lbs
Waste poison (D009)	65 lbs
Waste hydrochloric acid (D002)	25 lbs
Waste mineral spirits (D001)	15 lbs
Waste chlorine (D003)	5 lbs

Wastewater Treatment

The facility WWTP and Dewatering Presses (SWMU No. 4) receive all of the process wastewater from the mills. The process water in the mills is recirculated for further use until it becomes unusable. It is then pumped to the facility WWTP and Dewatering Presses, which consist of an intercept station with a bar screen, water clarifier, thickener, and dewatering presses.

The intercept station receives wastewater from the paper mill buildings. The wastewater primarily contains inks and clays from the de-inking facility and clays and pulp fibers from the paper machines. In addition, some oils and various process chemicals enter the floor drains either in dirty process wastewater or by spillage. The intercept station screens out large impurities and fiber fragments. These solids are collected in a two-cubic-yard roll-off and discarded as municipal waste. GPC did not have an estimate of the quantity of waste generated at the intercept station (GPC, 1991c).

From the intercept station, the water is pumped to the clarifier. Solids suspended in the wastewater are flocculated with alum and settle out in the water clarifier, which discharges milky-white water from the top of the clarifier to the KWRP. GPC discharges a total of 4.5 to 5 million gallons of wastewater per day to the KWRP (GPC, 1991c).

The wet residuals are pumped to the thickener which removes more wastewater (discharged back to the clarifier) and then pumps the thickened residuals via a head tank to the dewatering presses which remove the remaining free water. Wastewater from the presses is pumped back to the thickener and the pressed residuals are piled up inside the press building (See Photo No. 8) for storage until they are hauled to the King Highway Landfill (SWMU No. 5). GPC generates a total of approximately 150 cubic yards of residuals per day (GPC, 1991c).

Facility and Vehicle Maintenance

GPC is in the process of retrofilling all PCB transformers at the GPC facility with non-PCB fluids. Seven PCB transformers remain at the facility. PCB-containing wastes are accumulated in the Hazardous Waste Drum Storage Area (SWMU No. 1) in 55-gallon drums. GPC did not have an estimate of the annual quantity of PCB wastes generated at the facility (GPC, 1991c).

Nonhazardous waste oil is generated during lubrication of various machinery, as well as during routine vehicle maintenance. This waste oil is collected in one of two 250-Gallon Portable Waste Oil Tanks (SWMU No. 10) located in the maintenance areas. When a portable tank is full, maintenance employees transfer the waste oil to a 1,000-Gallon Waste Oil Aboveground Storage Tank (AST) (SWMU No. 11) located in the northwest section of the Mill Property within the diked area surrounding an empty 500,000-gallon fuel oil tank. The oil is analyzed before it is transported off-site for recycling and is nonhazardous (KAR Laboratories, 1989). GPC did not have an estimate of the annual quantity of waste oil generated at the facility (GPC, 1991c).

GPC regularly paints machinery and parts. Painting takes place in Mill No. 1 (See Figure 2), and is done by hand with brushes. The paints and thinners used are stored in locked cabinets. Paint thinner wastes containing ethyl ether and methanol (D001, F003, F005) are accumulated in a 55-gallon satellite accumulation drum. The Paint Thinner Waste Satellite Accumulation Drum (SWMU No. 3) is located in the paint area and is kept closed and marked. When the satellite accumulation drum is full, it is transferred to the Hazardous Waste Drum Storage Area (SWMU No. 1) to await transport off-site. Paint waste (D001) is transferred directly to a 55-gallon drum in SWMU No. 1 upon generation. These wastes are currently stored for less than 90 days at the facility. In the first 10 months of 1991, GPC shipped 100 pounds of paint thinner waste containing ethyl ether and methanol (D001, F003, F005), and 300 pounds of paint waste (D001) (GPC, 1991c).

GPC maintains three Safety-Kleen parts washers at the facility for tool and part clean-up. The waste petroleum naphtha (D001) generated by these parts washers is transported off-site by Safety-Kleen and constitutes the facility's largest hazardous waste stream. In the first 10 months of 1991, GPC shipped 5,848 pounds of waste petroleum naphtha (D001). This waste is not managed in any GPC facility SWMU.

2.4 HISTORY OF DOCUMENTED RELEASES

The PA/VSI revealed several documented releases of contaminants into the environment at the GPC facility. Releases of PCBs to groundwater and surface water have occurred from facility landfills (SWMU Nos. 5, 6, and 7); there have been several releases of process water to the Kalamazoo River; and there was one release to the river of wastewater treatment plant residuals from a waste hauling truck. There have also been two reported spills of raw materials at the facility. Additionally, GPC performed remediation during removal of several leaking and/or abandoned USTs. These events are further described below. There is no documentation of a release to air from the facility, or of any odor complaints from nearby residents.

PCB Releases

From the late 1950s until the mid-1970s, the facility accepted waste carbonless copy paper for recycling into pulp for papermaking (GPC, undated (b)). At that time, this type of paper contained PCBs, primarily Aroclor 1242. PCBs contained in this waste paper were also present in the process wastestreams which were disposed of in the King Highway Lagoons (now King Highway Landfill, SWMU No. 5) and the Willow Boulevard Landfill (SWMU No. 6). In June 1986, MDNR personnel sampled sediments from the Willow Boulevard Landfill and the King Highway Lagoons in connection with ongoing studies of PCB contamination in the Kalamazoo River. The sampled sediments were in contact with the river or in eroding banks and PCBs were detected in the samples at concentrations of 35 to 47 milligrams per kilogram (mg/kg) (MDNR, 1986). As a result of these findings, MDNR requested that GPC follow up with a study plan and an immediate action including fencing and erosion control (MDNR, 1987a).

Swanson Environmental (Swanson), a GPC contractor, tested soils and residuals at the Willow Boulevard Landfill (SWMU No. 6) and reported PCB levels up to 167 mg/kg (Swanson, 1987a). In April 1987, MDNR personnel observed a number of individuals digging for worms (for fishing bait) on the Willow Boulevard Landfill. Testing of worms from the landfill revealed PCB levels up to 8.7 mg/kg (MDNR, 1987b). Testing of the blood of the worm diggers revealed no PCB levels above the normal range for individuals in Michigan (MDPH, 1987). In 1987, GPC contracted Dell Engineering to study remediation alternatives for the Willow Boulevard Landfill. Dell installed three monitoring wells at the landfill and detected PCB concentrations up to 1.35 micrograms per liter (ug/l) in groundwater (Dell Engineering, 1988). Dell's recommendations to GPC included a fabric

formed concrete cover for the landfill and sheet piling along the river to contain the PCB contamination. GPC is currently awaiting MDNR approval of this plan.

In February 1990, GPC collected residuals samples and groundwater samples from the Willow Boulevard Landfill for dioxin and furan analysis. Sample results indicated that 2,3,7,8 tetrachlorodibenzodioxin (TCDD), the most toxic cogener, was present in the residuals at concentrations up to 117 parts per trillion (ppt), but was not present in detectable quantities in groundwater. Relatively less toxic dioxins such as total octachlorodibenzodioxin (OCDD) were detected at levels up to 300,000 ppt in the residuals and 0.86 ppt in groundwater. 2,3,7,8 tetrachlorodibenzofuran (TCDF) was detected at levels up to 396 ppt in residuals, and was not detected in groundwater (GPC, 1990b).

MDNR also requested that GPC conduct further studies on the King Highway and 'A' Landfills. The King Highway Landfill (SWMU No. 5) is the only active land disposal area at the GPC facility. Most of the residuals that were placed in this area when it was used as a dewatering lagoon had been excavated and transferred to the other landfills by 1977. The current landfilling activity did not begin until 1987 (GPC, 1991c). Soil analyses from some portions of this area indicate the presence of PCBs at concentrations of up to 99 mg/kg (Swanson, 1987b). Groundwater analyses for PCBs run by MDNR were inconclusive (MDNR, 1991b).

During the 1950s and 1960s the Allied Paper Company handled PCB-contaminated wastes in the lagoons which were later purchased by GPC and used as the 'A' Landfill (SWMU No. 7). GPC installed three monitoring wells at the 'A' Landfill as part of the formal closure of the landfill in 1988. Swanson installed two additional wells in 1990 as part of a site investigation. Swanson also conducted soil sampling and found no PCBs in residuals located near the surface. However, they did detect PCB concentrations up to 14.8 mg/kg in residuals located at depths between 15 feet and 27 feet below ground surface (BGS). Monitoring well analysis results indicate the presence of PCBs in downgradient groundwater at concentrations up to 1.7 ug/l (Swanson, 1990). MDNR and GPC are pursuing further studies before closure of the 'A' Landfill is finalized (GPC, 1991c).

Process Water Releases

In 1982 and 1983, a total of three separate releases of process water from the GPC mills to the Kalamazoo River occurred. These releases totaled approximately 550 gallons, with a solids content of approximately 20 pounds. These releases occurred as a result of process water surges or stuck valves (GPC, 1982a, 1982b, 1983). GPC repaired the valves and, to correct these problems, instructed mill personnel not to discharge process water in surges (GPC, 1991c).

In May 1985, GPC released approximately 50,000 gallons of process water containing approximately 97 pounds of solids to the river as a result of a power failure which shut down the facility pumps (GPC, 1985a). MDNR demonstrated concern over the release and

required GPC to re-engineer the facility outfalls to prevent a future release. This construction was completed in 1988 (GPC, 1988b). There have been no subsequent documented releases of process water.

Other Spills

In June 1985, an estimated five pounds of residuals from the facility WWTP entered a storm drain leading to the Kalamazoo River after falling from a GPC waste hauling truck onto the roadway during rainy weather. The spill was attributed to a faulty tailgate handle on the truck (GPC, 1985b).

In March 1988, approximately 30 gallons of sodium bisulfite were spilled at the GPC facility and entered a storm sewer leading to the Kalamazoo River. The spill occurred in a loading area during a delivery (MDNR, 1988). No information on MDNR or facility follow-up to these spills was available in the GPC file information.

In July 1988, approximately 200 gallons of corrosive sodium aluminate was spilled in the Mill No. 3 receiving dock during a delivery. This spill was immediately contained with Speedi-Dri and Attapulgus clay, and did not enter storm drains or the Kalamazoo River. The spill was neutralized with alum and disposed of through the facility WWTP (GPC, 1988a). No documentation of other reported spills was present in EPA or MDNR files.

Underground Storage Tank Removals

In September 1989, GPC began the removal of two USTs (AOC No. 1) from the area immediately west of Mill No. 1. These USTs included one 12,000-gallon fuel oil UST and one 5,000-gallon kerosene UST. At the same time, GPC began removal of a 10,000-gallon gasoline UST (AOC No. 2) located immediately southeast of the facility WWTP. During the removal, GPC's contractor encountered contaminated soils near the fuel oil and gasoline USTs. GPC's contractor found no leaks or contaminated soils associated with the kerosene tank; this is the only removal which had received MDNR certification of clean closure at the time of VSI (GPC, 1991c).

According to the October 1989 Initial Abatement Measures Report filed by GPC with the MDNR, immediate abatement for the two leaking USTs was limited (GPC, 1989b). The fuel oil tank was located between railroad spurs and the excavation was halted prior to the removal of all contaminated soils to avoid undermining the tracks. Soil samples were collected from the excavation and the excavation was backfilled with clean soils. The contractor recommended soil borings and monitoring wells to determine the extent of contamination (TMI Environmental, 1990). Three monitoring wells were installed by the project consultants and quarterly monitoring of benzene, toluene, ethylbenzene, and xylene (BTEX) compounds and total petroleum hydrocarbons has not shown any detectable impact on groundwater (KAR Laboratories, 1990b).

The gasoline UST was located at an unspecified depth in contact with the water table and for this reason the contractor did not deem continued excavation the most appropriate remediation measure. Samples of pooled groundwater in the excavation indicated BTEX contamination. The excavation was left open pending further study, but was filled with clean soil after monitoring wells were installed. The excavation of the gasoline UST was filled with clean soil at a later date. All excavated soils were disposed of in an off-site landfill. The contractor recommended soil borings and monitoring wells to determine the extent of contamination (TMI Environmental, 1990). Three monitoring wells were installed by the project consultants and quarterly monitoring of BTEX compounds and total petroleum hydrocarbons has not shown any detectable impact on groundwater (KAR Laboratories, 1990b).

In August 1990, GPC removed a 12,500-gallon ammonium hydroxide UST (AOC No. 3) from an area immediately south of Mill No. 4. This UST had not been in use for at least 15 years and had only been recently "discovered" by facility maintenance personnel. During the removal GPC determined through the presence of an ammonia odor that the tank had leaked an unknown amount of ammonium hydroxide into surrounding soils. A sample from the bottom of the excavation revealed 208 mg/kg of nitrogen in ammonia form (KAR Laboratories, 1990a). The Initial Abatement Measures Report filed by GPC with the MDNR stated that abatement was limited by the presence of groundwater in the excavation, which was backfilled with clean soil (GPC, 1990a). The excavated soils were disposed of in an off-site landfill. There have been no subsequent remediation measures at this AOC (GPC, 1991c).

In September 1991, GPC removed a 30,000-gallon No. 6 residual fuel oil UST. This tank was located in the same area (AOC No. 1) as the kerosene and fuel oil tanks previously removed from west of Mill No. 1. This UST had been empty since 1982, when the facility converted its boiler to coal and gas, and had leaked oil to surrounding soils. GPC filed an Initial Abatement Measures Report with MDNR in October 1991. According to the report, all visually contaminated soils had been removed during the UST excavation and disposed of in an off-site landfill (GPC, 1991b). No analytical results from the sampling were available at the time of the PA/VSI.

2.5 REGULATORY HISTORY

RCRA

In August 1980, the GPC facility submitted a Notification of Hazardous Waste Activity to EPA identifying the facility as a generator and storage facility of a variety of wastes generated from non-specific sources (GPC, 1980a).

In November 1980, GPC submitted to EPA a Part A Permit application (Part A) identifying one hazardous waste drum storage area (SWMU No. 1). The Part A identified

the type and volume of hazardous waste to be stored in 55-gallon drums at the facility as follows (GPC, 1980b):

RCRA Waste Code	Description	Volume
D001	unspecified	5,000 gallons
D002	unspecified	500 gallons
D003	unspecified	200 gallons
D004	unspecified	200 gallons
F001	unspecified	300 gallons
F010	unspecified	200 gallons

In May 1983, MDNR issued an Interim License granting GPC interim status as a RCRA storage facility (GPC, 1991c). MDNR conducted an inspection in 1983 and noted deficiencies in the facility's training records, arrangements with local authorities, inspection logs, contingency plan, closure plan, and secondary containment in the hazardous waste drum storage area (MDNR, 1983). There is no documentation of follow-up or resolution of these issues in available file information.

Early in 1985, GPC filed a Request for Change in Status Form with EPA to change its status to generator only. In July 1985, MDNR conducted a closure inspection and found the GPC facility to be in compliance with 40 CFR 262.34 and to have conducted proper RCRA closure in accordance with the facility's 1981 closure plan (MDNR, 1985).

In January 1989 an MDNR inspection revealed that the facility was operating as a small-quantity generator and noted deficiencies with the facility's contingency plan (no emergency coordinator or emergency information) and with personnel training (MDNR, 1989b). GPC responded to these deficiencies in February 1989 (GPC, 1989a). There is no documentation in MDNR's files concerning whether MDNR followed up on the GPC letter and approved GPC's actions.

CERCLA

Due primarily to PCB contamination of sediments, EPA has placed the Portage Creek/Kalamazoo River (PC/KR) Superfund site on the National Priorities List (NPL). EPA has identified GPC as a Potentially Responsible Party (PRP) because of known releases of PCBs from the King Highway lagoons (SWMU No. 5), the Willow Boulevard Landfill (SWMU No. 6), and the 'A' lagoons (SWMU No. 7) (See Section 2.4, Release History). The PC/KR Superfund site includes the closed Allied Paper Company facility, three miles of Portage Creek, and 35 miles of the Kalamazoo River. MDNR has taken the lead for administering this site. In December 1990, GPC and two other PRPs signed an Administrative Order of Consent with MDNR. GPC is currently participating in the development of a Remedial Investigation Workplan which will focus on source areas such as the landfills as a first priority. The schedule for the RI/FS is still in the development stages, but is expected to be finalized in early 1992 (EPA, 1991 and 1992).

Clean Water Act

GPC received an NPDES permit No. 0006190 on June 28, 1974, mainly for discharges of noncontact cooling water. In 1974, the facility had a total of nine outfalls to the Kalamazoo River (MDNR, 1974). The outfalls also discharged some sanitary sewage which is now routed separately to the KWRP (GPC, 1991c). GPC last applied for renewal of their NPDES permit in 1985, and MDNR requested that the bypass sewer to the river be eliminated to prevent a future reoccurrence of the 1985 process water release to the river (See Section 2.4). The construction work was completed in 1988 (GPC, 1988b). The permit has not been re-issued; GPC is currently operating under the expired permit (GPC, 1991c). Other than process water releases discussed in Section 2.4, Release History, there is no file information indicating that there have been any NPDES permit violations from the GPC facility.

The facility currently has three outfalls. Outfall 001 discharges approximately 7.7 million gallons per day (MGD) of noncontact cooling water used in the facility boiler house. Outfall 002 is located adjacent to the cooling water intake and discharges a small quantity of wastewater used to clean the intake screen. Outfall 003 discharges intake screen shower water from the intake for the papermaking process water.

All process wastewater receives treatment in the facility clarifier prior to discharge to the KWRP. This discharge is not regulated under NPDES. On April 4, 1989, EPA Region V included the GPC facility on its list of pulp and paper mills which bleach with chlorine, and was therefore a possible source of dioxin discharges. EPA wished to regulate dioxin discharges and impose an effluent limit of 0.01 ppt of 2,3,7,8 TCDD toxicity equivalent (EPA, 1989). In 1990, GPC and KWRP began quarterly sampling of the GPC residuals and effluent, and the KWRP influent. The facility has indicated that no chlorine bleaching is performed at the facility (GPC, 1991a). GPC collected the first quarterly sample on June 26, 1990, and no TCDD or TCDF was detected. GPC collected the second sample on October 11, 1990, and this sample contained 0.006 ppt total TCDF (Triangle Labs, 1990). GPC effluent samples collected in 1991 contained between 0.005 and 0.5 ppt of hexa-, hepta-, and octa-chlorodibenzodioxins (Triangle Labs, 1991). As a result, MDNR is requiring continued sampling on an annual basis (MDNR, 1991c). None of the samples showed a TCDD toxicity equivalent of greater than 0.01 ppt.

Clean Air Act

GPC maintains one air pollution control permit for its coal-fired boiler (Permit No. 439-82). MDNR issued this permit on October 4, 1985. Prior to 1982, the facility boiler burned fuel oil. The permit limits emissions as follows:

Parameter	Quantity
Particulates	0.10 pounds (lbs) per 1,000 lbs exhaust
Sulfur dioxide	1.67 lbs per million British Thermal Units (BTU)
Visible emissions	20% opacity

An MDNR inspection of the facility in 1989 revealed that GPC was operating in compliance with this permit (MDNR, 1989a). No file information was available regarding releases to the atmosphere or permit violations.

Landfill License

The history of residuals disposal at the GPC facility is complicated. Prior to 1954, process wastewater from the Kalamazoo Paper Company was discharged directly to the Kalamazoo River. In 1954, the company constructed the original clarifier (SWMU No. 4), and excavated the four King Highway Lagoons (SWMU No. 5) for dewatering effluent from the clarifier. GPC excavated one or two lagoons per year, beginning in the early 1960s, and transported the residuals to the Willow Boulevard Landfill (SWMU No. 6) (GPC, 1991c).

Allied Paper Company operated a series of residuals lagoons located immediately east of the Willow Boulevard Landfill. In 1975, GPC purchased these lagoons and began to use the area as a landfill ('A' Landfill (SWMU No. 7)) to dispose of dried residuals from the King Highway Lagoons. The Willow Boulevard Landfill has not been used since 1975 (GPC, 1991c).

In 1977, GPC installed the present wastewater treatment system (SWMU No. 4) and eliminated the need for the residuals lagoons. GPC stopped using the King Highway Lagoons in 1977. Dewatered residuals from the new dewatering presses were hauled directly to the 'A' Landfill (SWMU No. 7) until 1987, when GPC began landfilling at the King Highway Landfill (SWMU No. 5).

The King Highway Landfill (SWMU No. 5) is the only facility landfill to have been licensed by MDNR. The license was issued in 1983 (No. 7536) and filling operations at the King Highway Landfill began in 1987. GPC has had TCLP tests run on the residuals which have determined that they are nonhazardous (KAR Laboratories, 1991).

MDNR inspected the King Highway Landfill in 1989 and found that GPC was not in compliance with the requirement that there be no impoundment of water on the landfill surface (MDNR, 1989c). MDNR found the same problem during a 1990 inspection (MDNR, 1990b). Prior to re-issuing the landfill license, MDNR required GPC to correct this problem (MDNR, 1990a). GPC removed the ponded water in early 1991 (GPC, 1991c), and MDNR renewed the license (MDNR, 1991a).

MDNR and GPC have sampled the residuals from the former dewatering lagoons which remain in the King Highway Landfill and have found that PCBs are present (Swanson, 1987a). This issue is discussed more fully in Section 2.4, Release History. Analysis of groundwater samples has revealed the presence of vinyl chloride and 1,2-dichloroethene at low concentrations (MDNR, 1990a). GPC has attributed this contamination to upgradient sources since the level of contamination is the same in upgradient and downgradient wells, and because the residuals generated at the facility do not contain these contaminants (GPC, 1991c).

Underground Storage Tanks

The GPC facility currently has one 12,000-gallon diesel fuel UST. This tank was installed in 1981 (GPC, 1991c). Since 1989, GPC has removed a total of five USTs. Four of these USTs had releases to the soil. The leaking USTs contained gasoline, fuel oil, No. 6 residual fuel oil, and ammonium hydroxide. Each removal involved some remediation of contaminated soils and monitoring wells were installed in the areas [redacted] The UST removal efforts are described in detail in Section 2.4, Release History. One removed tank which contained kerosene did not leak, and MDNR approved the tank closure (GPC, 1991c). The remaining tank closures have not been completed because the excavations did not remove all contaminated soils from the areas around the USTs. GPC is currently monitoring the groundwater in the areas around the petroleum USTs.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and groundwater in the vicinity of the GPC facility.

2.6.1 Climate

The greater Kalamazoo area has a continental climate characterized by a wide range of temperatures between summer and winter, though the climate is somewhat modified by proximity to Lake Michigan (MDA, 1971). Average wind speed and direction is southwest at 10 miles per hour (NOAA, 1990). Precipitation is moderate and heaviest in the spring and early summer. Average annual precipitation is approximately 34 inches and evapotranspiration averages approximately 24 inches (Dell Engineering, 1988); net annual precipitation is approximately 10 inches. The one-year 24-hour rainfall is approximately 2.3 inches (NOAA, 1979).

High temperatures in the summer rarely exceed 90 degrees Fahrenheit (°F). Low temperatures in the winter are 0 °F or higher. The average annual temperature is 49.7 °F, and ranges from an average 72.9 °F in July to 24.7 °F in January (MDA, 1971).

2.6.2 Flood Plain and Surface Water

The GPC facility is located along the Kalamazoo River in the city of Kalamazoo. The southern and western portions of the GPC Mill Property are located within the 100-year flood plain of the river (FEMA, 1981). Portions of the three GPC landfills (SWMU Nos. 5, 6 and 7) are adjacent to the river and also lie in the 100-year floodplain. Surface water runoff from the GPC facility flows into the river. The Kalamazoo River flows west and discharges to Lake Michigan approximately 50 miles to the west at Saugatuck, Michigan. The Kalamazoo River in the vicinity of the GPC facility is a designated Superfund NPL site due to PCB-contaminated sediments (EPA, 1991).

2.6.3 Geology and Soils

The soils of the GPC facility are mapped as Urban land and a soil description is not available. Adjacent areas are characterized by poorly drained Glendora sandy loam in unfilled areas along the river and well-drained Oshtemo and Kalamazoo sandy loams with Urban Land in higher areas away from the river. These soils are developed in sandy fluvial sediments (SCS, 1971).

The GPC facility is located in the Kalamazoo River valley, and surficial geological materials consist of largely of fluvial deposits overlying glacial outwash sands and gravels. Occasional lenses of silt or clay are encountered in some borings at depths between 25 and 40 feet, and are generally thin and discontinuous. A basal clay layer directly overlying bedrock is also present in some area borings. The total thickness of the unconsolidated deposits is approximately 75 feet at the facility (Wilkins and Wheaton, 1982).

Bedrock underlying the unconsolidated materials in the area of GPC is the Mississippian-age Coldwater Shale (WMU, 1981). This formation is quite extensive and can be as much as 1,300 feet thick in some areas (MDNR, 1964).

2.6.4 Groundwater

A two-aquifer system has been identified for the vicinity of the GPC facility (Wilkins and Wheaton, 1982). The hydrologic system is broken down into four major units: (1) an upper aquifer, (2) an intervening semi-confining layer, (3) a lower aquifer, and (4) a basal confining layer. The mid-level semi-confining layer is a thin clayey deposit occurring at depths of 25 to 40 feet BGS in some area borings (Wilkins and Wheaton, 1982). The Coldwater Shale or a clay-rich material directly overlying the bedrock at approximately 75 feet BGS comprise the basal layer. Groundwater at the facility occurs between five feet and ten feet BGS (Wilkins and Wheaton, 1982; Dell Engineering, 1988), and corresponds to the level of the Kalamazoo River. Groundwater flow throughout the facility is towards the river. There is a municipal well drawing water from the lower aquifer and located one-eighth of a mile north of the facility. This well is theoretically upgradient since the facility lies between the well and the Kalamazoo River. However, it is not known if a cone of depression associated with this well extends to a portion of the GPC facility.

Groundwater monitoring wells have been installed in several areas throughout the facility. Wilkins and Wheaton placed six wells at the King Highway Landfill in 1981 to monitor for PCBs. Dell Engineering placed three wells at the Willow Boulevard Landfill in 1988 to monitor for PCBs. Swanson Environmental placed three wells at the 'A' Landfill in 1988, and two additional wells in 1990 to monitor for PCBs. Finally, TMI Environmental installed six wells in the vicinity of the Non responsive [redacted] portion of the Mill Property to monitor for total petroleum hydrocarbons and BTEX compounds (See Figure 2 for monitoring well locations).

All facility monitoring wells are screened in the upper aquifer. At the landfills, the monitoring well depths range between Non responsive [redacted], and most of the wells are set

at around Non [redacted]. In the UST areas, the wells are mostly around Non [redacted] deep. The pattern of groundwater contamination is discussed in Section 2.4, Release History. There are low levels of PCBs (up to 1.7 ug/kg) in the groundwater below the Willow Boulevard and 'A' Landfills (SWMU Nos. 6 and 7). There is no confirmed PCB contamination of the groundwater at the King Highway Landfill (SWMU No. 5), but there is a plume of chlorinated organic compounds, which are apparently migrating to the landfill from off-site (GPC, 1991c). No contamination has been detected in monitoring wells installed in the Non responsive [redacted]

Private and municipal water supplies in the Kalamazoo area are derived exclusively from groundwater wells drawing from unconsolidated aquifers (WMU, 1981). The nearest well to the GPC facility is a municipal well located Non responsive [redacted] of the facility (Verburg, 1991).

2.7 RECEPTORS

The GPC facility is partially located within the municipal boundaries of Kalamazoo, Michigan, which has a metropolitan population of approximately 90,000. Downtown Kalamazoo is located approximately two miles west of the facility.

The GPC facility is located in a mixed residential and industrial area. Private residences are located immediately south of the Willow Boulevard and 'A' Landfills. The entire Mill Property is fenced, with the exception of areas fronting the Kalamazoo River. Guards are present 24 hours per day (GPC, 1991c). The Kalamazoo River flows west through the GPC property, separating the Mill Property from the landfill areas (See Figure 2).

Potential receptors of an air release at the GPC facility include the individuals currently employed at the facility (approximately 300 persons). The potential for public contact with air contaminants is limited because the quantities of volatile hazardous substances at the facility are small and would rapidly dissipate in the outside air.

There have been past incidents of public contact with contaminants present in the soils of the Willow Boulevard Landfill. These all occurred prior to 1987, when the landfill was not fenced. Some nearby residents used the landfill property for worm digging in the past. Although worms from the landfill were tested and showed elevated levels of PCBs in their tissues, blood samples from individuals who had dug worms at the landfill did not show a consistent pattern of elevated PCB levels (MDPH, 1987). The most likely receptors of a soil release at the facility are the facility employees, and recreational boaters who gain access from the river.

The Kalamazoo River is used for industrial water supplies, fishing and recreational activities, and there is a public park located approximately one-eighth of a mile downstream of the facility (USGS, 1967). Persons using the river for such purposes are the potential

receptors of a surface water release from the facility. There are no drinking water intakes in the Kalamazoo River (Verburg, 1991).

The surrounding residences obtain their water from the municipal water supply, which derives water exclusively from glacial aquifers in the area. The nearest public well is located one-eighth of a mile north of the facility. Because of the cone of depression, there is some potential for this upgradient well to be affected by releases to groundwater at the Mill Property. Potential receptors of groundwater contamination from the facility include all residents using the municipal water supply (approximately 90,000 persons) because this water is blended from all active wells during distribution (Verburg, 1991).

Sensitive environments located in the vicinity of the GPC facility include a wetland located one-quarter of a mile north of the facility. There are also sensitive populations located within a three-quarter mile radius, including elementary schools and day care centers (USGS, 1967).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 13 SWMUs identified during the PA/VSI. The following information is presented for each SWMU; description of the unit, dates of operation, wastes managed, release controls, history of release, and Dynamac's observations.

SWMU No. 1 **Hazardous Waste Drum Storage Area**

Unit Description: The Hazardous Waste Drum Storage area consists of a 14-foot by 50-foot concrete-floored area enclosed inside Mill No. 4 (See Photo Nos. 1, 2, and 3). From 1983 to 1985, GPC had an Interim License from MDNR to operate this SWMU as a RCRA storage facility. GPC collected hazardous waste generated at the facility and stored the wastes in 55-gallon drums at this SWMU until arrangements were made to have the waste shipped off-site for treatment and/or disposal.

Date of Startup: The first date that this area was used to collect waste solvents is unknown. This SWMU has been active as a storage area for RCRA-defined hazardous wastes since before 1980.

Date of Closure: This SWMU was RCRA-closed with MDNR approval in 1985. From 1985 to the present, it has remained active for storage of drums of hazardous waste for less than 90 days. The facility is currently a small-quantity generator of hazardous wastes.

Wastes Managed: This SWMU routinely manages ignitable paint waste (D001) and paint thinner waste containing methanol and ethyl ether (D001, F003, F005) generated during painting of facility equipment. This SWMU also handles some nonhazardous wastes such as waste fluorescent light ballasts. A variety of occasional wastes such as waste PCB fluids from transformers, expired laboratory chemicals, and unused chemicals from process trials are also stored in this SWMU.

Release Controls: The north and east sides of this SWMU are enclosed by brick walls and the south and west sides are enclosed by a six-foot chain-link fence. There is a concrete floor in good condition with a six-inch berm, but there is a two-inch ramp at the doorway which reduces the effective height of the berm to two inches. There are no floor drains.

History of Documented Releases: There have been no documented releases from this SWMU.

Observations: This SWMU appeared to be in good operating condition, except that a two-foot diameter hole in the roof allowed some rainwater to accumulate on the floor (See Photo No. 3). There were no noticeable odors. There were no hazardous wastes in this SWMU at the time of the VSI. The SWMU contained one 55-gallon drum of nonhazardous fluorescent light ballasts, one 20-gallon drum containing nonhazardous waste grease, and one 55-gallon drum of unused oil dry "sausages" for use in case of spills (See Photo No. 2). There was no visible evidence of spills in this SWMU. There was a sign indicating this area is used to store hazardous waste (See Photo No. 1). There were also signs restricting the area to authorized personnel.

SWMU No. 2	**Nonhazardous Waste Drum Storage Area**
Unit Description:	This SWMU consists of an approximately 6-foot by 14-foot area located immediately west of the Hazardous Waste Drum Storage Area in Mill No. 4. The SWMU has a concrete floor and is fenced. Access is through an opening in the east side of the fence (See Photo No. 4). The SWMU is used for the storage of nonhazardous wastes in 55-gallon drums.
Date of Startup:	This SWMU has been in use since 1985.
Date of Closure:	This SWMU is currently active.
Wastes Managed:	This SWMU manages occasional nonhazardous wastes consisting of expired off-specification products used in various processes. The SWMU contained two 55-gallon drums of spent ammonium hydroxide at the time of the VSI.
Release Controls:	This SWMU is located indoors on a concrete floor. This SWMU is enclosed by a brick wall on the north and by a 6-foot chain link fence on the other three sides.
History of Documented Releases:	There have been no documented releases from this SWMU.
Observations:	This SWMU was well kept and free of debris. At the time of the VSI this SWMU contained three drums containing dilute ammonium hydroxide, and two empty drums. The drums appeared to be in good condition. There was no evidence of any spills in this SWMU.

SWMU No. 3 **Paint Thinner Waste Satellite Accumulation Drum**

Unit Description: This SWMU is located within Mill No. 1, adjacent to the equipment painting area on the floor beneath one of the paper machines. The SWMU consists of a single closed and marked 55-gallon drum standing near a brick wall (See Photo No. 5). Paint thinner wastes are placed in the drum upon generation.

Date of Startup: It is not known for certain when this SWMU was first used. Painting of equipment has been ongoing since the plant first opened in 1892. The SWMU was in use prior to 1980.

Date of Closure: This SWMU is currently active.

Wastes Managed: This SWMU manages paint thinner waste containing ethyl ether and methanol (D001, F003, and F005).

Release Controls: This SWMU is located inside Mill No. 1 on a concrete floor. Floor drains in the facility lead to the GPC WWTP.

History of Documented Releases: There have been no documented releases from this SWMU.

Observations: This SWMU is a single 55-gallon drum which was closed and labeled. There was no evidence of spills from this SWMU.

SWMU No. 4 **Wastewater Treatment Plant and Dewatering Presses**

Unit Description: This SWMU is located at the west end of the GPC property and consists of an intercept station with a bar screen, water clarifier, thickener, and dewatering presses. The intercept station is located in a small building south of Mill No. 1. The water clarifier is located outdoors and is 135 feet in diameter. An inactive 120-foot clarifier is located southeast of the active clarifier. The thickener is 50 feet in diameter, and is located east of the active clarifier. The two dewatering presses and residual piles are located in the WWTP building (See Figure 2).

The intercept station receives process wastewater from the paper mill buildings. The intercept station screens out large impurities and fiber fragments, and these solids are collected in a two-cubic-yard roll-off (See Photo No. 6) and disposed of as municipal solid waste (SWMU No. 14). From the intercept station, the water is pumped to the clarifier. Solids suspended in the wastewater settle out in the water clarifier, which discharges milky-white water to the Kalamazoo Water Reclamation Plant (KWRP) (See Photo No. 7). The wet residuals are pumped to the thickener which removes more water (discharged back to the clarifier) and the thickened residuals are then pumped via a head tank to the dewatering presses which remove the remaining free water. Water from the presses is pumped back to the thickener, and the pressed residuals are piled up inside the WWTP building (See Photo No. 8) where they are stored until they are hauled to the King Highway Landfill (SWMU No. 5).

Approximately 85,000 gallons of pond water from the surface of the King Highway Landfill were also treated in this SWMU in 1991 (GPC, 1991c).

Date of Startup: This SWMU was first used in 1954, when only a clarifier was used and the wet residuals were discharged to residuals lagoons located at the present King Highway Landfill (SWMU No. 5). The current system was installed and first operated in 1977 (GPC, 1991c).

Date of Closure: This SWMU is currently active. GPC has not used the original clarifier since the new clarifier was installed in 1977.

Wastes Managed:	The WWTP handles process wastewater generated by the recycling and papermaking processes conducted at the Mill Property. The wastewater primarily contains inks and clays from the de-inking facility and clays and pulp fibers from the paper machines. In addition, some oils and various process chemicals enter the floor drains either in dirty process wastewater or by spillage The effluent is tested for hazardous constituents and is nonhazardous.
Release Controls:	The clarifier is not equipped with oil retention booms to collect floating material, should any reach this system. The residuals are partially contained within the WWTP building, but are also spilled over an outside concrete pad and the adjacent ground when the residuals are loaded onto the trucks for transport to the landfill (See Photo No. 8). These spilled residuals are cleaned up on an occasional basis.
History of Documented Releases:	No releases have been documented directly from this SWMU. However, see Section 2.4 for a discussion of process water releases to the Kalamazoo River.
Observations:	This SWMU is within the fenced area of the Mill Property. The wastewater treatment plant appeared to be in good operating condition, except that a great deal of foam was being discharged to the KWRP. Some foam was observed spurting from a sewer manhole cover after discharge from the clarifier. Mr. Hester of GPC attributed this foam to the volume of process water coming from the cleanup of one of the paper machines. The concrete pad is in good condition, but there was some spillage of residuals on the ground in the area.

SWMU No. 5 **King Highway Landfill**

Unit Description: This SWMU is located southwest of the Mill Property, south of the Kalamazoo River, and north of King Highway. The landfill consists of four cells totalling 15.4 acres. Only Cells 1, 2 and 3 (12.2 acres total) are currently licensed for residuals disposal (MDNR, 1991a). Cell 1 is filled to an elevation of approximately 25 feet above the level of the Kalamazoo River and Cell 2 is now being filled to that elevation. Cell 3 will be filled in the future. The cells are constructed with steep side slopes (approximately 25% grade) and nearly level top surfaces. Residuals are hauled to the landfill from the dewatering presses (SWMU No. 4) in GPC trucks, and are dumped and spread. There is no daily cover at the landfill. GPC uses six inches of compacted soil for final cover when the licensed elevation is reached. The landfill cells lie on top of former unlined residuals dewatering lagoons, which were separated by dikes and closed in 1977. The landfill is fenced except for the river frontage.

Date of Startup: This SWMU was first operated as a series of residual lagoons in 1954. GPC stopped discharge to the lagoons in 1977 (Wilkins and Wheaton, 1981). The King Highway Landfill was first licensed in 1983, but did not accept residual wastes until 1987 (GPC, 1991c).

Date of Closure: This SWMU is currently active as a landfill. The former lagoons were not used after 1977. No formal closure was performed on the lagoons.

Wastes Managed: The residuals lagoons accepted effluent from the WWTP for dewatering. From the late 1950s to the mid-1970s Kalamazoo Paper Company and GPC accepted carbonless copy paper containing PCBs for recycling, and the process wastewater discharged to the lagoon also contained PCBs. This type of paper no longer contains PCBs and the facility wastes do not now contain PCBs (GPC, undated (b)). The residuals wastes now generated at the WWTP have been analyzed by TCLP and found to be nonhazardous (KAR Laboratories, 1991).

The King Highway Landfill is licensed to accept only residuals from papermaking at the Kalamazoo GPC facility (MDNR, 1991a).

Release Controls: The landfill is not lined and has no leachate collection system. The final cover is approximately six inches of compacted soil on the closed portion of the landfill. Closed cells are graded for runoff control. Ponded water is trucked to the facility WWTP.

History of Documented Releases:	Groundwater in the vicinity of the King Highway Landfill has been analyzed for PCBs, but the results were inconclusive (MDNR, 1991b).
Observations:	Cell 2 of the landfill was being filled during the VSI (See Photo No. 9). The residuals are not covered with soil on a daily basis, but there was no odor associated with the residuals waste. Dynamac did not observe any stressed vegetation at the landfill.

SWMU No. 6 **Willow Boulevard Landfill**

Unit Description: This SWMU covers approximately 11 acres and is located south of the Mill Property, south of the Kalamazoo River, and north of Willow Boulevard. The surface of the Willow Boulevard Landfill is irregular; the highest portion is approximately 22 feet above the level of the Kalamazoo River. The maximum depth of residuals fill is 27 feet (Dell Engineering, 1988) This SWMU is fenced except for the river frontage. The SWMU is inactive and formerly accepted dewatered residuals.

Date of Startup: The Willow Boulevard Landfill first accepted residuals from the King Highway lagoons (SWMU No. 5) in the early 1960s (GPC, 1991c). This SWMU was never a licensed landfill.

Date of Closure: This SWMU stopped receiving wastes in 1975 (Wilkins and Wheaton 1981). GPC submitted closure plans to MDNR in 1988, and submitted revisions in 1991. GPC is awaiting MDNR approval of the plans.

Wastes Managed: This SWMU was used to dispose of dewatered residuals excavated from the King Highway lagoons (SWMU No. 5). Some of these residuals contained PCBs derived from the recycling of PCB-containing carbonless copy paper in the mill papermaking operations. No analysis of the PCB-containing residuals was performed at the time these residuals were generated. Analysis of residuals in Willow Boulevard Landfill in the late 1980s indicated total PCB concentrations up to 167 mg/kg (Swanson, 1987a).

Release Controls: The landfill has no liner, leachate collection system, or cap. Some erosion of the banks along the river occurred in the past, but has been controlled by the placement of stone rip rap in zones of rapid flow (Dell Engineering, 1988).

GPC has submitted engineering plans for containment of this SWMU to MDNR, and is awaiting final approval. These plans involve driving sheet piling along the river frontage of the landfill to limit groundwater discharge from the landfill to the river, and a fabric formed concrete cap to prevent infiltration of rainwater into the fill.

History of Documented Releases: Soils in this SWMU contain PCB concentrations up to 167 mg/kg (Swanson, 1987a). Groundwater beneath this SWMU is contaminated with PCBs at levels up to 1.25 ug/l (Dell Engineering, 1988). Groundwater discharges to the Kalamazoo River.

Observations: Except for one discarded car frame, the landfill area was relatively free of excess debris and was covered with grass, and young trees and shrubs (See Photo No 10). Dynamac did not observe any stressed vegetation at this SWMU.

SWMU No. 7 **'A' Landfill**

Unit Description: This SWMU covers approximately 23 acres and is located southeast of the Mill Property, south of the Kalamazoo River, and between Davis Creek and the Willow Boulevard Landfill (SWMU No. 6). The 'A' Landfill is approximately 30 feet above the level of the Kalamazoo River, and the maximum depth of fill is approximately 29 feet (Swanson, 1990). This area was formerly the location of two lagoons owned by Allied Paper Company and used for residuals disposal. This SWMU is fenced except for the river frontage. The 'A' Landfill was never licensed.

Date of Startup: This SWMU was owned and operated as residuals lagoons by Allied Paper Company prior to its purchase by GPC. It is not known when the lagoons were first used. GPC purchased the area in 1975 and began landfilling residuals from the King Highway lagoon area at that time. After 1977 the landfill received residuals directly from the dewatering presses at the facility WWTP (Swanson, 1990).

Date of Closure: This SWMU stopped receiving wastes in 1987 (Swanson, 1990). There has been no formal closure of this landfill or the lagoons.

Wastes Managed: GPC used this SWMU to dispose of dewatered residuals excavated from the King Highway lagoons (SWMU No. 5) and from the WWTP dewatering presses (SWMU No. 4). Prior to 1975, Allied Paper Company disposed of residuals in lagoons in this area. Some of these residuals contained PCBs derived from the recycling of PCB-containing carbonless copy paper in the mill papermaking operations.

Release Controls: Neither the landfill nor the lagoons had a liner, leachate collection system, or cap.

History of Documented Releases: Groundwater beneath this SWMU is contaminated with PCBs at levels up to 1.7 ug/kg (Swanson, 1990). Groundwater discharges to the Kalamazoo River.

Observations: The landfill area was relatively free of excess debris and is partially covered with grass and young trees and shrubs (See Photo No 11). Some areas of the landfill are bare soil and residuals (Photo No. 12) where vegetation has not yet colonized. Dynamac did not observe any areas of stressed vegetation.

SWMU No. 8 **Rejected Material Collection System**

Unit Description: This system consists of a one-cubic-yard steel roll-off hopper and a 20-gallon fiber barrel located inside the de-inking building used to collect rejected solids from waste paper prior to use. Rejected solids are removed first by screening the pulped waste paper which emerges from the Hydropulper. Material that is too large to pass through the screen is collected in the one-cubic-yard hopper (Photo No. 13). Small and heavy materials such as sand and staples are separated by a sand trap and collected in the fiber barrel. The rejected material from both these units is taken to the trash compactor or an open 20-yard roll-off (SWMU No. 14) for disposal in a municipal landfill (GPC, 1991c).

Date of Startup: The rejected material collection system has been incorporated into the de-inking process since the current de-inking facility was installed in 1975.

Date of Closure: This SWMU is currently active.

Wastes Managed: This SWMU handles nonhazardous rejected paper solids and foreign materials such as staples, tape, plastic, sand, and paper chunks.

Release Controls: Runoff wastewater from the bins is collected in floor drains and discharged to the facility WWTP (See Photo No. 13).

History of Documented Releases: There have been no documented releases from this SWMU.

Observations: Although the rejected material collection system is designed to remove solids without significant free water, Dynamac observed that the collection hopper beneath the screen was overflowing to the floor sewer at the time of the VSI (See Photo No. 13).

SWMU No. 9 **Scrap Metal Collection System**

Unit Description: Scrap metal, primarily consisting of bands and wire removed from bundles of wastepaper and pulp, are staged in a one-cubic-yard steel hopper, and a pair of one cubic-yard steel rolling bins (See Photo No. 14). Wastepaper bundles are opened in the de-inking facility (Mill No. 3) and pulp bundles are opened near the pulpers associated with the paper machines. When the hoppers are full, the metal is sent off-site for recycling (GPC, 1991c). There is an additional 20-cubic-yard scrap metal roll-off located near the foundation of old Mill No. 5 on the west end of the property. A large quantity of metal parts from paper machines and other equipment not currently in use are located in this area, and those parts which are discarded are placed in the roll-off for off-site recycling (See Photo No. 15).

Date of Startup: The date of startup of this SWMU is unknown.

Date of Closure: This SWMU is currently active.

Wastes Managed: This SWMU manages oil-free scrap metal for recycling.

Release Controls: The components of this unit adequately contain the oil-free solid scrap metal.

History of Documented Releases: There have been no documented releases from this SWMU.

Observations: The components of this SWMU appeared to be in good operating condition. Dynamac did not observe any spills or inappropriate wastes around the components of this SWMU.

SWMU No. 10 **Portable Waste Oil Tanks**

Unit Description: Waste oil generated by the paper machines and facility-wide maintenance activities is collected in one of two 250-gallon portable tanks (See Photo No. 16). One of these is normally kept in Mill No. 3, but could not be located at the time of the VSI. Dynamac observed the other portable tank in the maintenance shop located in Mill No. 4. When these tanks are full, they are rolled outside and the oil is pumped into a 1,000-gallon waste oil AST (SWMU No. 11).

Date of Startup: The facility began collecting waste oil in portable tanks in 1983.

Date of Closure: This SWMU is currently active.

Wastes Managed: This SWMU manages nonhazardous waste oil generated during facility and vehicle maintenance.

Release Controls: The portable tanks are normally kept indoors on concrete paved surfaces. In case of spillage, the oil would enter the floor drains and be carried to the facility WWTP and then be discharged to the KWRP.

History of Documented Releases: There have been no documented releases from this SWMU.

Observations: The portable waste oil tank observed by Dynamac appeared to be in good condition. There was no evidence of spillage in the area around the portable waste oil tank.

SWMU No. 11 **1,000-Gallon Waste Oil Aboveground Storage Tank**

Unit Description: The steel 1,000-gallon waste oil AST is located west of the facility boiler plant, beside a 500,000-gallon fuel oil AST that was in use until 1981. Both of these tanks are located within a large diked area (See Photo No. 17).

Date of Startup: The tank was installed in 1983.

Date of Closure: This SWMU is currently active.

Wastes Managed: All non-PCB-contaminated waste oil generated at the facility is stored at this SWMU. The waste oil in the tank is tested for contamination before it is transported off-site as nonhazardous waste (KAR Laboratories, 1989). The waste oil is recycled at an off-site facility.

Release Controls: The 1,000-gallon waste oil AST is situated inside a large concrete paved area surrounded by five-foot concrete dikes. However, the concrete floor of this area is not well maintained and is extensively cracked. Grass is growing throughout the area.

History of Documented Releases: There have been no documented releases from this SWMU.

Observations: Dynamac observed two extensive oil stains in the area. There was one oil stain surrounding the tank (See Photo No. 17) and a second oil stain located on a concrete pad outside the diked area where the hoses used for filling and draining the tank are located. It is not known whether oil has penetrated the cracked concrete to the soil below.

SWMU No. 12	**Empty Drum Crushing and Disposal Area**
Unit Description:	This SWMU, located inside and outside of Mill No. 4, consists of a drum crusher machine and a 30-cubic-yard roll-off for disposal of these crushed drums. GPC also disposes of other miscellaneous wastes in this roll-off, which is hauled to a municipal landfill (See Photo No. 18). Mr. Campbell of GPC stated during the VSI that the facility tries to purchase its required products in returnable drums whenever possible to minimize the number of discarded drums.
Date of Startup:	This SWMU began operating in 1982.
Date of Closure:	This SWMU is currently active.
Wastes Managed:	Empty drums (containing a depth of less than one inch of product) of various purchased products (including hazardous materials such as paints, solvents, corrosive liquids and biocides) are handled in this SWMU.
Release Controls:	There are no release controls in this area.
History of Documented Releases:	There have been no documented releases from this SWMU.
Observations:	The area was relatively clean and well maintained. Dynamac did not observe any spillage or staining.

SWMU No. 13 **Coal Ash Baghouses and Storage Silo**

Unit Description: This SWMU is located immediately northwest and adjacent to the facility coal-fired boiler. There are six baghouses and one storage silo (See Photo No. 19). The baghouses are round towers approximately 40 feet tall and 10 feet in diameter which capture flyash from the boiler. After the flyash is settled and collected it is conveyed to the adjacent storage silo. The storage silo is a round tower approximately 40 feet tall which stores flyash from the baghouses and bottom ash directly from the boiler. Trucks are loaded with the ash under the storage silo, and the ash is hauled to a municipal landfill. The SWMU is located outdoors on a concrete pad.

Date of Startup: This SWMU was installed in 1982.

Date of Closure: This SWMU is currently in use.

Wastes Managed: This SWMU handles flyash and bottom ash from the facility coal-fired boiler.

Release Controls: The components of this SWMU are sealed and adequately contain the ash. The loading area is concrete and Mr. Hester of GPC stated that the facility uses water sprinklers during truck loading of ash to keep down dust.

History of Documented Releases: There have been no documented releases from this SWMU.

Observations: The SWMU appeared to be in good condition. Dynamac did not observe any coal ash on the ground in the vicinity of this SWMU.

4.0 AREAS OF CONCERN

Dynamac identified three AOCs during the PA/VSI of the GPC facility. All three are former locations of USTs. The three AOCs are west of Mill No. 1 (AOC No. 1), east of the WWTP (AOC No. 2), and south of Mill No. 4 (AOC No. 3). GPC excavated and removed contaminated soil from each of these locations. The AOCs are discussed below.

AOC No. 1 Fuel Oil and No. 6 Residual Fuel Oil UST Area

In September 1989, GPC began the removal one steel 12,000-gallon fuel oil UST and one 5,000-gallon kerosene UST from the area immediately west of Mill No. 1 (See Photo No. 22). In September 1991, GPC removed a 30,000-gallon No. 6 residual fuel oil UST from this same area. GPC contractors visually inspected and sampled the soils around the kerosene UST and found no impact from leaking product, and this UST received clean closure approval from MDNR. The kerosene UST was located within AOC No. 1, but has not contributed to the concern. The fuel oil USTs had leaked and contaminated surrounding soils. All visibly contaminated soils around the 30,000-gallon UST were excavated, but the 12,000-gallon fuel oil UST was located between railroad spurs and the risk of undermining the tracks imposed limits on the excavation of contaminated soils. GPC Non responsive [redacted], and no impact on the groundwater has been observed in quarterly sample results from 1990 and 1991. This area is designated as an AOC because contaminated soils are still present, with the potential to release contamination to groundwater in the future.

AOC No. 2 Gasoline UST Area

AOC No. 2 is the former location of a leaking steel 10,000-gallon gasoline UST, immediately east of the facility WWTP (See Photo No. 23). During the September 1989 removal, GPC contractors encountered contaminated soils in contact with groundwater. The GPC contractors did not complete excavation of impacted soils because groundwater occurred at such a shallow depth in this area. GPC Non responsive [redacted], and no impact has been noted in sample results. This area is designated as an AOC because contaminated soils are still present, with the potential to release contamination to groundwater in the future.

AOC No. 3 Ammonium Hydroxide UST Area

In August 1990, GPC removed a steel 12,500-gallon ammonium hydroxide UST from an area immediately south of Mill No. 4 (See Photo No. 24). This UST had not been in use for at least 15 years and had only been recently 'discovered' by facility maintenance personnel. Odors and sample results indicated that the UST had leaked nitrogen in ammonia form into surrounding soils at levels up to 208 mg/kg. Initial abatement was limited by the presence of groundwater in the excavation, which was backfilled with clean soil. This area is designated an AOC because there has been no MDNR approval of the removal and no monitoring of groundwater to determine if there has been a release.

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5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 13 SWMUs and three AOCs at the Georgia-Pacific facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are Dynamac's conclusions and recommendations for each SWMU and AOC. Table 3 identifies the SWMUs and AOCs at the GPC facility and suggested further actions.

SWMU No. 1 **Hazardous Waste Drum Storage Area**

Conclusions: The Hazardous Waste Drum Storage Area is well maintained with the exception of a leaking roof. The area has adequate capacity for storage of the occasional hazardous wastes generated, although the effective berm is only two inches high. The SWMU is locked and has signs restricting access. The wastes managed in this SWMU are generated during facility maintenance (painting) activities and from spent or unused process and laboratory chemicals.

The potential for release to the air, soil, groundwater, and surface water is low. During the VSI, Dynamac observed that all hazardous wastes were stored in closed 55-gallon drums in good condition. The SWMU is indoors, concrete-floored, and bermed (See Photo Nos. 1 and 3). No releases have been documented. "Oil dry" is kept in the area to contain any spills.

Drums containing nonhazardous waste were located in this area along with drums of hazardous waste (See Photo No. 1). One 55-gallon drum containing hazardous waste was not marked or labelled (See Photo No. 3).

Recommendations: No further actions are recommended at this time.

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TABLE 3
SWMU AND AOC SUMMARY

Solid Waste Management Unit	Operational Dates	Evidence of Release	Suggested Further Action
1. Hazardous Waste Drum Storage Area	Unknown to Present*	None Documented.	None.
2. Nonhazardous Waste Drum Storage Area	1985 to Present	None Documented.	None.
3. Paint Thinner Waste Satellite Accumulation Drum	Unknown to Present	None Documented.	None.
4. Wastewater Treatment Plant and Dewatering Presses	1954 to Present	Dewatered residuals spilled on ground.	Contain spills of WWTP residuals.
5. King Highway Landfill 99% construction	1954 to Present	PCBs in soil and river sediments.	Continue PCB monitoring, develop remediation plan.
6. Willow Boulevard Landfill	1960s to 1975	PCBs in soils, river, and groundwater.	Continue monitoring and developing remediation plan.
7. 'A' Landfill	Unknown to 1987	PCBs in soils, river, and groundwater.	Continue PCB monitoring, vegetate surface, and develop remediation plan.
8. Rejected Material Collection System	1975 to Present	None Documented.	None.
9. Scrap Metal Collection System	Unknown to Present	None Documented.	None.
10. Portable Waste Oil Tanks	1983 to Present	None Documented.	None.
11. 1,000-Gallon Waste Oil AST	1983 to Present	Oil stain on cracked concrete pad.	Sample soils and clean up oil stain.
12. Empty Drum Crushing and Disposal Area	1982 to Present	None Documented.	None.
13. Coal Ash Baghouses and Storage Silo	1982 to Present	None Documented.	None.

MDEQ consider PCB residuals

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* SWMU No. 1 underwent MDNR-approved RCRA-closure in 1985 and is currently used to store hazardous waste for less than 90 days.

TABLE 3 - continued
SWMU AND AOC SUMMARY

Area of Concern	Operational Dates	Evidence of Release	Suggested Further Action
1. Fuel Oil and No. 6 Residual Fuel Oil UST Area	Unknown to 1989 and 1991	Contaminated soils.	Continue groundwater monitoring.
2. Gasoline UST Area	Unknown to 1989	Contaminated soils.	Continue groundwater monitoring.
3. Ammonium Hydroxide UST Area	Unknown to 1990	Contaminated soils.	Initiate soil borings and groundwater monitoring.

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SWMU No. 2 **Nonhazardous Waste Drum Storage Area**

Conclusions: This SWMU is used to store nonhazardous wastes in 55-gallon drums. It is located indoors adjacent to SWMU No. 1.

The potential for release to the air, soil, groundwater, and surface water is low. The SWMU is located indoors on a concrete floor and well lit. There is a leaky roof. "Oil-dry" is kept in the area to contain any spills. All wastes are stored in closed drums.

Recommendations: No further actions are recommended at this time.

SWMU No. 3 **Paint Thinner Waste Satellite Accumulation Drum**

Conclusions: This SWMU is located within the maintenance area of Mill No. 4. The drum is clearly labeled "Flammable Paint Waste" (See Photo No. 4) and there are "No Smoking" signs posted in the area. The drum is kept closed and is in good condition.

The potential for release to the air, soil, groundwater, or surface water is low. The drum is closed and kept indoors on a concrete floor. There have been no documented releases from this SWMU.

Recommendations: No further actions are recommended at this time.

SWMU No. 4 **Wastewater Treatment Plant and Dewatering Presses**

Conclusions: This SWMU is located at the west end of the Mill Property. It receives all of the process wastewater from the de-inking and papermaking processes, and also from the floor sewers in the mills. Effluent from this SWMU is discharged to the KWRP, and dewatered residuals are hauled to the King Highway Landfill (SWMU No. 5).

Dynamac observed that residuals had spilled on soils in the area around the loading area. The potential for release to the air, groundwater, and surface water is low. No volatile or hazardous substances are handled at this SWMU. However, the WWTP clarifier is not equipped with oil retention booms to collect any floating material which might enter the system from a spill on the floor of one of the mills. The effluent discharged to KWRP is monitored daily for

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oil, oxygen demand, and other parameters. The KWRP can accommodate up to 100 mg/l of oil, and there is no documentation that this limit has been exceeded in the facility effluent. No other releases have been documented.

Recommendations: Dynamac recommends that some measures be taken to control the spread of residuals on the ground, such as expanding the concrete pad, more frequent cleaning up of this area, and/or constructing a berm around the pad.

SWMU No. 5 **King Highway Landfill**

Conclusions: This SWMU is located south of the Kalamazoo River and occupies approximately 15.4 acres. This area was used from 1954 to 1977 as a series of lagoons for dewatering of residuals from the WWTP (SWMU No. 4), but has only accepted dewatered residuals since 1987. Residuals remaining from pre-1977 disposal contain PCBs. The landfill is active and licensed. There is no liner or leachate collection system. The SWMU is fenced, except along the Kalamazoo River. There is no daily cover. Only facility-generated pulp-related wastes are landfilled. Recent problems involving ponded water on the surface of the landfill have been corrected. Groundwater Non responsive [redacted] but there has been no confirmed release of PCBs to groundwater. Six inches of soil is used for final cover (GPC, 1991c).

The potential for release to the air is low. No volatile substances are handled at this SWMU. There is documented PCB soil contamination. Because of the documented release to soils and the high water table at the landfill, there is a high potential for a release to groundwater, but no groundwater releases have been documented. There is also a documented release of contaminated soils to the Kalamazoo River, which is a NPL Superfund site in this area.

Recommendations: Dynamac recommends that GPC continue to comply with the conditions of the landfill license and monitor groundwater for PCBs. Dynamac also recommends that remediation plans for the PCB-containing residuals remaining at the SWMU be developed.

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SWMU No. 6 **Willow Boulevard Landfill**

Conclusions: This SWMU is located south of the Kalamazoo River and east of SWMU No. 5, and consists of an inactive 11-acre landfill. This SWMU received dewatered residuals excavated from the old King Highway lagoons (SWMU No. 5) until 1975. The landfill was not permitted, and has no liner or leachate collection system. Groundwater Non responsive [redacted].

Residuals disposed of at this SWMU contained PCBs, and there is documented soil, groundwater, and surface water contamination as a result of releases from this SWMU. The potential for release to the air is low. No volatile substances are handled at this SWMU. The facility has drawn up engineering plans for containment of the wastes in the landfill.

Recommendations: Dynamac recommends that the facility continue to monitor groundwater for PCBs and work with the MDNR on closure and remediation of the landfill.

SWMU No. 7 **'A' Landfill**

Conclusions: This SWMU is another residuals landfill located south of the Kalamazoo River. This 23-acre landfill was operated as a series of dewatering lagoons in the past by Allied Paper Company. GPC used the landfill from 1975 to 1987. The landfill was not licensed and did not have a liner or leachate collection system. Some slopes on the landfill are not vegetated.

The potential for release to the air from this SWMU is low. No volatile substances were handled at this SWMU. Residuals disposed of here by Allied Paper Company contained PCBs which have migrated to soils and groundwater. Groundwater Non responsive [redacted] The potential for release to surface water is high due to the proximity to the Kalamazoo River and the bare slopes.

Recommendations: Dynamac recommends continued groundwater monitoring for PCBs and an effort to promote vegetation growth on the bare areas. Dynamac also recommends that remediation plans for the PCB-containing residuals remaining at the SWMU be developed.

SWMU No. 8 **Rejected Material Collection System**

Conclusions: This SWMU consists of a hopper and tub which collected rejected material from the wastepaper de-inking process, and a 40-cubic-yard roll-off for disposal. The roll-off is hauled to a municipal landfill for disposal.

The potential for release to the air, soil, ground water, or surface water is low. The SWMU is located indoors except for the roll-off. Spills are directed to the floor sewer and the WWTP intercept station. There have been no documented releases from this SWMU.

Recommendations: No further actions are recommended at this time.

SWMU No. 9 **Scrap Metal Collection System**

Conclusions: This SWMU consists of two rolling bins, one steel hopper and a 30-cubic-yard roll-off. Scrap metal is generated from bands holding purchased bundles of wastepaper, wire holding bales of purchased pulp, and miscellaneous scrap stored outside on the mill grounds.

The potential for release to the air, soil, groundwater, or surface water from this SWMU is low. The oil-free scrap is adequately contained in the SWMU. No releases have been documented.

Recommendations: No further actions are recommended at this time.

SWMU No. 10 **Portable Waste Oil Tanks**

Conclusions: Waste oil generated by facility and vehicle maintenance activities is collected and stored in two portable 250-gallon tanks prior to being transferred to a 1,000-gallon waste oil AST (SWMU No. 10).

The potential for release to the air, soil, groundwater, or surface water from this SWMU is low. The tanks observed by Dynamac appeared to be in good condition. Potential spills would be contained with available "oil-dry." No releases have been documented.

Recommendations: No further actions are recommended at this time.

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SWMU No. 11 **1,000-Gallon Waste Oil Above Ground Storage Tank (AST)**

Conclusions: This SWMU is located inside a diked area surrounding an unused 500,000-gallon fuel oil storage tank.

There is a high potential for release to the air, soil, and groundwater from this SWMU. The 1,000-gallon waste oil AST is situated inside a large concrete paved area surrounded by five-foot concrete dikes, but the concrete is cracked and there is a large oil stain around the tank. Dynamac also observed a stain on a concrete area near the draining and filling pipes. The potential for a release to surface water is low because the area is contained.

Recommendations: Dynamac recommends a cleanup of the oil stains and an investigation of the possibility of a release of oil to the soil and groundwater.

SWMU No. 12 **Empty Drum Crushing and Disposal Area**

Conclusions: This SWMU consists of an empty drum crusher and a 40-cubic-yard disposal roll-off. The drums are emptied by all practical means, but not washed (GPC 1991c). A variety of process chemicals are purchased in these drums.

The potential for release to the soil, groundwater, or surface water from this SWMU is low. The SWMU manages empty drums. The roll-off provides adequate containment and no releases have been documented. The potential for release to the air is moderate. The drums are empty, but may contain volatile residuals. In addition, the roll-off is located outside and open to the atmosphere.

Recommendations: No further actions are recommended at this time.

SWMU No. 13 **Coal Ash Baghouses and Storage Silo**

Conclusions: This SWMU manages flyash and bottom ash from the coal-fired boiler. There are six baghouses and one storage silo. The combined ash is off-loaded onto trucks from the storage silo. Water sprinklers are used to control dust during off-loading.

The potential for release to the air, soil, groundwater, or surface water from this SWMU is low. The SWMU is well maintained and Dynamac did not observe any ash on the ground in the area. No releases have been documented.

Recommendations: No further actions are recommended at this time.

AOC No. 1 **Fuel Oil and No. 6 Residual Fuel Oil UST Area**

Conclusions: This AOC consists of the former location of a 12,000-gallon fuel oil UST which was removed in 1989 and a 30,000-gallon No. 6 residual fuel oil UST which was removed in 1991. AOC No. 1 is located immediately west of Mill No. 1. Soils in the vicinity of both of these tanks were found to contaminated. A 5,000-gallon kerosene UST was also removed from this area in 1989, but there was no evidence of contaminated soils in the area around this tank.

GPC did not remove all the contaminated soils from this AOC because of the risk of undermining adjacent railroad tracks. GPC [redacted], and quarterly sampling of the wells has not yet revealed any groundwater contamination.

Recommendations: Dynamac recommends that GPC continue monitoring groundwater for BTEX compounds and total petroleum hydrocarbons until it is clear that there will be no release from the contaminated soils remaining in the area.

AOC No. 2 **Gasoline UST Area**

Conclusions: This AOC consists of the former location of a 10,000-gallon gasoline UST which was removed in 1989 from the area immediately east of the facility WWTP. Soils in the vicinity of the UST were found to be contaminated, and groundwater encountered in the removal excavation also contained gasoline.

GPC did not remove all contaminated soils from this area because of the presence of shallow groundwater. GPC installed monitoring wells, and quarterly sampling of the wells has not yet revealed any groundwater contamination.

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Recommendations: Dynamac recommends that GPC continue monitoring groundwater for BTEX compounds and total petroleum hydrocarbons, and if contamination is found, develop a remediation plan.

AOC No. 3 **Ammonium Hydroxide UST Area**

Conclusions: This AOC consists of the former location of a 12,500-gallon ammonium hydroxide UST which was removed in 1990 from the area immediately south of Mill No. 4. Soils in the vicinity of the UST were found to contaminated.

GPC did not remove all contaminated soils from this area because of the presence of shallow groundwater. GPC has not installed monitoring wells, and it is not known whether groundwater is contaminated.

Recommendations: Dynamac recommends that GPC install soil borings and wells to monitoring groundwater, and, if contamination is found, develop a remediation plan.

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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT
FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
MI	MID042441022

II. SITE NAME AND LOCATION

01 SITE NAME	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
Georgia-Pacific Corporation	2426 King Highway

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Kalamazoo	MI	49001	Kalamazoo		

09 COORDINATES LATITUDE	LONGITUDE
42 17 10 0	085 33 00

10 DIRECTIONS TO SITE (Starting from nearest public road)
Facility entrance is ¼ mile west of intersection of Business I-94 and King Highway in Kalamazoo.

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing, residential)
Georgia-Pacific Corporation	2426 King Highway

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Kalamazoo	MI	49001	(616) 382-2890

07 OPERATOR (If known and different from owner)	08 STREET (Business, mailing, residential)
Same as owner.	

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
			( )

13 TYPE OF OWNERSHIP (Check one)
XX A. PRIVATE ☐ B. FEDERAL: _____ (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER: _____ (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)
XX A. RCRA 3010 DATE RECEIVED: 11 18 80 (Month Day Year) ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ___ (Month Day Year) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
XX YES DATE 11 13 91 (Month Day Year)
☐ NO

BY (Check all that apply)
☐ A. EPA XX B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)
CONTRACTOR NAME(S): Dynamac Corporation

02 SITE STATUS (Check one)
XX A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION
~ 1892 (Beginning year) | Present (Ending year) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
Hazardous wastes generated by GPC include paint waste (D001), paint thinner waste (D001, F003, F005), waste petroleum naphtha (D001 , plus occassional laboratoy chemicals and PCB wastes.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
Documented releases of PCBs to soil, groundwater, and surface water from facility landfills. Low potential for air releases. Facility is a PRP at Portage Creek/ Kalamazoo River NPL site. Remedial Investigation Work Plan is in preparation.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)
☐ A. HIGH (Inspection required promptly) XX B. MEDIUM (Inspection required) ☐ C. LOW (Based on site available data) ☐ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA REGION V	(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Russ Crittenden		Dynamac Corp.	(312) 466-0222	11 13 91 (Month Day Year)

EPA FORM 2070-12 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
MI	MID042441022

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

XX SOLID
_ B POWDER, FINES
XX C SLUDGE
_ D OTHER _____ (Specify)
_ E SLURRY
X F LIQUID
_ G GAS

02 WASTE QUANTITY AT SITE (Measures of waste quantities must be independent)

TONS _____
CUBIC YARDS ~~Unknown~~
NO. OF DRUMS _____

03 WASTE CHARACTERISTICS (Check all that apply)

XX A TOXIC
_ B CORROSIVE
_ C RADIOACTIVE
_ D PERSISTENT
_ E SOLUBLE
_ F INFECTIOUS
_ G FLAMMABLE
X H IGNITABLE
_ I HIGHLY VOLATILE
_ J EXPLOSIVE
_ K REACTIVE
_ L INCOMPATIBLE
_ M NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE (TOXIC)	150	Cubic Yards	Daily generation rate of paper
OLW	OILY WASTE			residuals (formally contained PCBs).
SOL	SOLVENTS (IGNITABLE)	6,000	Pounds	Annual generation rate.
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS (TOXIC)	Unknown		Occassional PCB wastes from trans-
IOC	INORGANIC CHEMICALS			transformers.
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
SLU	PCBs		Landfill in 1950s & 60s	167	mg/kg (soil)
				1.7	mg/l (GW)
SOL	Waste petroleum naphtha		Safety-Kleen parts washers	NA	
	(D001)				
SOL	Paint thinner wastes		SO 1 storage	NA	
	(D001, F003, F005)				
OCC	PCBs		SO 1 storage	NA	

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS	NA		FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sampling results, reports)

EPA and MDNR files.
VSI conducted 11/13/91.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION
01 STATE: MI
02 SITE NUMBER: MID042441022

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 [X] A. GROUNDWATER CONTAMINATION — 02 [X] OBSERVED (DATE 1988) [ ] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 90,000 — 04 NARRATIVE DESCRIPTION

Documented release of PCBs to groundwater from facility landfills. There is a potential for municipal wells to be impacted by this release.

01 [X] B. SURFACE WATER CONTAMINATION — 02 [X] OBSERVED (DATE 1988) [ ] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0 — 04 NARRATIVE DESCRIPTION

PCB contaminated sediments in Kalamazoo River as a result of erosion from facility landfill.

01 [ ] C. CONTAMINATION OF AIR — 02 [ ] OBSERVED (DATE) [ ] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: — 04 NARRATIVE DESCRIPTION

None.

01 [ ] D. FIRE/EXPLOSIVE CONDITIONS — 02 [ ] OBSERVED (DATE) [ ] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: — 04 NARRATIVE DESCRIPTION

None.

01 [X] E. DIRECT CONTACT — 02 [ ] OBSERVED (DATE) [ ] POTENTIAL [X] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 20 — 04 NARRATIVE DESCRIPTION

In the past, some neighborhood residents dug for worms on PCB-contaminated landfill.

01 [X] F. CONTAMINATION OF SOIL — 02 [X] OBSERVED (DATE 1986, 1989) [ ] POTENTIAL [ ] ALLEGED
03 AREA POTENTIALLY AFFECTED: 40 (ACRES) — 04 NARRATIVE DESCRIPTION

Documented release of PCBs to soils of landfills.
Documented releases of petroleum and ammonium hydroxide from underground storage tanks.

01 [X] G. DRINKING WATER CONTAMINATION — 02 [ ] OBSERVED (DATE) [X] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 90,000 — 04 NARRATIVE DESCRIPTION

Groundwater at facility is contaminated with PCBs (up to 1.7 ug(l)). There is a potential for municipal wells to be affected.

01 [X] H. WORKER EXPOSURE/INJURY — 02 [ ] OBSERVED (DATE) [ ] POTENTIAL [ ] ALLEGED
03 WORKERS POTENTIALLY AFFECTED: 350 — 04 NARRATIVE DESCRIPTION

Some potential for worker exposure to PCB-contaminated soils at landfills.

01 [X] I. POPULATION EXPOSURE/INJURY — 02 [ ] OBSERVED (DATE) [X] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 90,000 — 04 NARRATIVE DESCRIPTION

Potential drinking water contamination from PCB-contaminated groundwater.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION
01 STATE: MI
02 SITE NUMBER: MID042441022

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
None observed.

01 ☒ K. DAMAGE TO FAUNA — 02 ☒ OBSERVED (DATE: 1987) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
PCBs detected in analysis of worm tissue from landfills.

01 ☒ L. CONTAMINATION OF FOOD CHAIN — 02 ☒ OBSERVED (DATE: 1987) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
PCBs detected in analysis of worm tissue from landfills.

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES — 02 ☒ OBSERVED (DATE: 1986) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 90,000
04 NARRATIVE DESCRIPTION
PCBs-contaminated soils eroded into river. Groundwater contaminated by PCBs.

01 ☒ N. DAMAGE TO OFFSITE PROPERTY — 02 ☒ OBSERVED (DATE: 1986) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
Kalamazoo River sediments contaminated by PCBs.

01 ☒ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs — 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
Process wastewater discharged to city sewer following pretreatment. Pretreatment does not remove oils.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
None observed.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS
None.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 90,000

IV. COMMENTS
Facility is a PRP for NPL site.

V. SOURCES OF INFORMATION
EPA and MDNR files.
VSI conducted 11/13/91.

EPA FORM 2070-12 (7-81)

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY
GEORGIA-PACIFIC CORPORATION
KALAMAZOO, MICHIGAN
MID 042 441 022

DATE	:	November 13, 1991
FACILITY REPRESENTATIVES	:	Philipp Hester Environmental Engineer Al Campbell Maintenance and Environmental Engineer Al Beshire, Corporate Engineer
INSPECTION TEAM	:	Russ Crittenden, Dynamac Corporation Valerie Farrell, Dynamac Corporation
PHOTO DOCUMENTATION	:	Valerie Farrell
WEATHER CONDITIONS	:	Sunny, 40-45° F, windy
SUMMARY OF ACTIVITIES	:	The VSI began at 7:30 A.M. at the Georgia-Pacific Corporation facility, located at 2425 King Highway in Kalamazoo, Michigan. Ms. Farrell reviewed the purpose of the facility visit with the facility representatives. Mr. Crittenden asked a variety of questions to fill gaps in available file information. Mr. Campbell and Mr. Hester gave an overview of the facility operations and provided the inspection team with company brochures that contained facility process diagrams and maps. The facility representatives described the facility as a 100-acre property employing 300 persons and producing approximately 370 tons of paper per day from wastepaper and virgin pulp. They continued to describe the facility as located in a mixed residential and industrial area, with a mill area on the north bank of the Kalamazoo River, and three separate landfill areas on the south bank of the river.

Downtown Kalamazoo is located two miles west of the facility. The metropolitan population of Kalamazoo is approximately 90,000 people.

The facility representatives summarized the waste generating processes associated with each step of its de-inking and papermaking process. In addition, they described the various wastestreams generated in facility maintenance, heating, wastewater treatment, and laboratory activities. They continued to describe the solid waste management units that managed each waste stream.

The facility representatives also discussed several underground storage tank removals, as well as the facility's regulatory history and status, including air and NPDES permits, as well as the facility's status as a generator of RCRA wastes.

At approximately 9:30 A.M., the inspection participants began the tour of the facility. The tour included all process areas and solid waste management units at the facility.

During the tour, Dynamac personnel observed 13 solid waste management units, including two used for the accumulation and storage of hazardous wastes. One of these areas is a hazardous waste drum storage area, for storing drums containing a variety of hazardous wastes for less than 90 days. During the early 1980s, this area was designated as the facility's permitted hazardous waste storage unit. No hazardous wastes were present in this area at the time of the VSI.

The other area used to manage hazardous wastes is a paint waste satellite accumulation area for solvent-based paint wastes generated from cleaning painting equipment used during facility maintenance.

Dynamac photographed solid waste management units and areas of concern observed during the facility tour. At approximately 1:50 P.M., Dynamac completed the tour and began a brief exit interview with the facility representatives before leaving the facility at 3:00 P.M.

Photo No.: 1 **Location:** SWMU No. 1
Orientation: Southwest **Date:** November 13, 1991
Description: Door of hazardous waste drum storage area (SWMU No. 1).

Photo No.: 2 **Location:** SWMU No. 1
Orientation: Southwest **Date:** November 13, 1991
Description: Unlabeled drums of nonhazardous light ballasts and grease in hazardous waste drum storage area.

Photo No.: 3 **Location: SWMU No. 1**
Orientation: Northwest **Date: November 13, 1991**
Description: Hazardous waste drum storage area.

Photo No.: 4 **Location: SWMU No. 2**
Orientation: Southeast **Date: November 13, 1991**
Description: Nonhazardous waste drum storage area. Three drums contain dilute ammonium hydroxide, one drum contains "oil-dry" (unused) and one drum is empty.

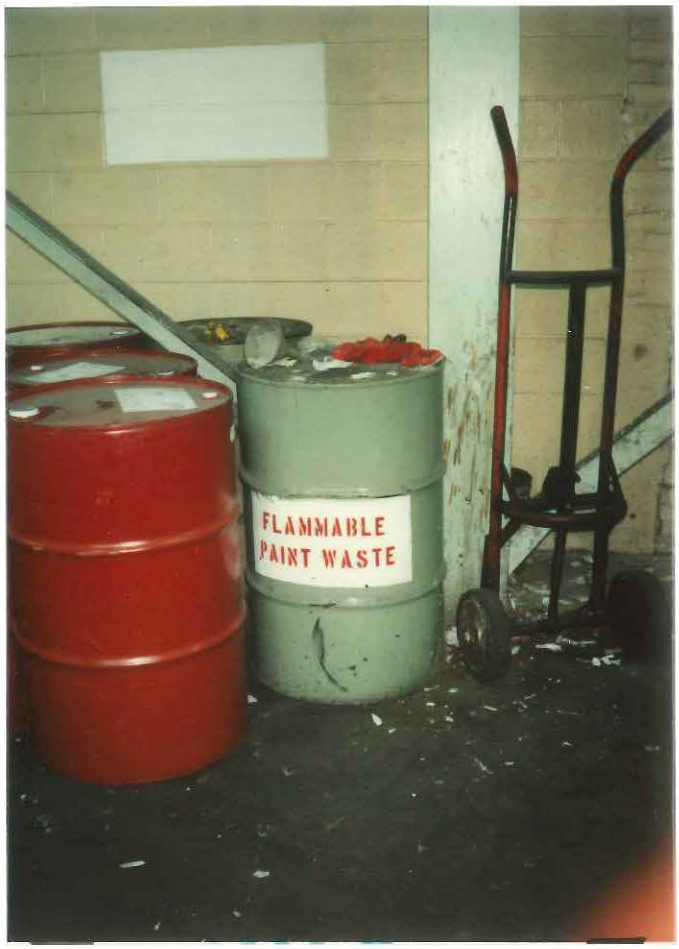


Photo No.	:	5
Location	:	SWMU No. 3
Orientation	:	Northwest
Date	:	November 13, 1991
Description	:	Paint thinner

waste satellite accumulation drum located on ground floor level of Mill No. 1.

Photo No.: 6 **Location:** SWMU No. 4
Orientation: Northeast **Date:** November 13, 1991
Description: Screened materials dumpster located at wastewater interceptor.

Photo No.: 7 **Location:** SWMU No. 4
Orientation: South **Date:** November 13, 1991
Description: Wastewater treatment plant 135-foot clarifier.

Photo No.: 8 **Location:** SWMU No. 4
Orientation: Southwest **Date:** November 13, 1991
Description: Dewatered residuals piled in wastewater treatment plant building awaiting transport to King Highway Landfill (SWMU No. 5).

Photo No.: 9
Orientation: North
Description: Active cell No. 2 at the King Highway Landfill.

Location: SWMU No. 5
Date: November 13, 1991

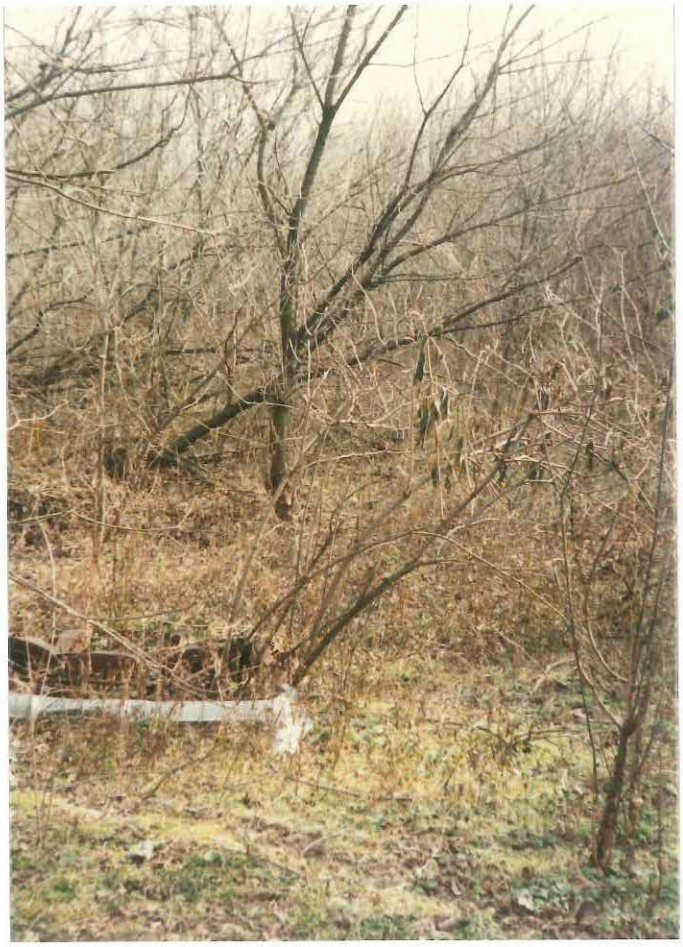


Photo No. : 10
Location : SWMU No. 6
Orientation : Southwest
Date : November 13, 1991
Description: Carframe and vegetation on Willow Boulevard Landfill.

Photo No.: 11
Orientation: North
Description: Vegetated surface of "A" landfill.

Location: SWMU No. 7
Date: November 13, 1991

Photo No.: 12
Orientation: South
Description: Bare patch on "A" landfill.

Location: SWMU No. 7
Date: November 13, 1991

Photo No. : 13
Location : SWMU No. 8
Orientation : East
Date : November 13, 1991
Description : Hopper for rejected material screened from wastepaper pulp.

Photo No.: 14
Orientation: Northwest
Description: Collection bin for pulp bale binding wire.

Location: SWMU No. 9
Date: November 13, 1991

Photo No.: 15 **Location:** SWMU No. 9
Orientation: Northwest **Date:** November 13, 1991
Description: Scrap metal roll-off located outdoors near old Mill No. 5.

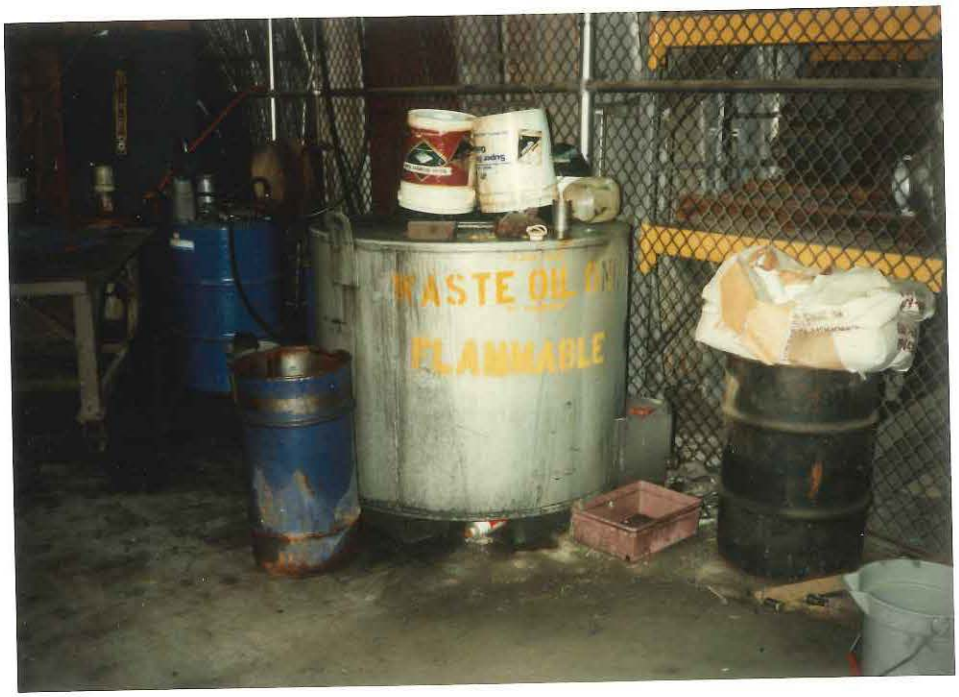


Photo No.: 16 **Location:** SWMU No. 10
Orientation: North **Date:** November 13, 1991
Description: Portable 250-gallon waste oil tank located in maintenance area of Mill No. 4.

Photo No.: 17 **Location:** SWMU No. 11
Orientation: East **Date:** November 13, 1991
Description: 1,000-gallon waste oil AST in diked area surrounding unused 500,000-gallon fuel oil AST.

Photo No.: 18 **Location:** SWMU No. 12
Orientation: Northeast **Date:** November 13, 1991
Description: Roll-off for crushed barrels and other municipal waste.

Photo No.: 19 **Location:** SWMU No. 13
Orientation: Southeast **Date:** November 13, 1991
Description: Blue baghouses for fly ash collection and gray storage silo for combined bottom and fly ash storage.

Photo No.: 20 **Location:** AOC No. 1
Orientation: Southeast **Date:** November 13, 1991
Description: Area of removal of three USTs: one leaking 30,000-gallon tank for No. 6 fuel oil; one leaking 12,000-gallon tank for diesel fuel; and one 5,000-gallon tank for kerosene (not leaking).

Photo No.: 21 **Location:** AOC No. 2
Orientation: West **Date:** November 13, 1991
Description: Area of removal of one leaking 10,000-gallon gasoline UST.

Photo No. : 22
Location : AOC No. 3
Orientation : North
Date : November 13, 1991
Description: Area of removal of one leaking 12,500-gallon ammonium hydroxide UST.

END OF PHOTOGRAPHS

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

Georgia - Pacific Corp.
November 13, 1991

Arrived at 7:30 am. Met:
Phil Hester Env. Engineer
Al Campbell Maint. & Env. Eng.
Al Beshire Corp. Engineer.
Inspectors: Russ Crittenden, Valerie Farrell.

Introduction made by Valerie. Got facility maps.
Russ asked some scattered questions on various topics

Process.

1st - De-inking of waste paper, trucked in from printers / suppliers. Add water, NaOH, dispersing (animal fat?) (40% waste (40-50%) paper. Reminder virgin pulp.) Hydro pulper

2nd Screen - takes out plastic, wood, etc. to dumpster under floor. Type II waste.

3rd Deflaker - rotating device separates fibers

4th Sand trap - small heavy impurities (sand, staples, etc.) to dumpster (otherwise)

5th - Flotation Cells - air injected to float ink which is skimmed. Some to pulper - most to sewer. pretreatment on facility then to city.

11/13/91

WWTP - thickened, dewatered, to King Hwy
Type III

6th - Pressure screens remove fiber bundles not yet seperated. Fibers to sewer. (some plastic ink)

7th Cleaners - remove more

8th Screen - more removal

9th Thickener - water removal, water to pulper.

10th Add peroxide, NaH_2SO_4 (?) / just before going to Bleach Tower.
Sodium Hydrosulfite

11th Blended w/ pulp from Pulper. Bought.
sometimes add clays. Sometimes dye at this step.

12th Refiner - removal of impurities, to sewer.

13th cleaners / screens ↗

14th Paper machine
head box spreads pulp on to fourdrinier (traveling screen). drains some water. Press section squeezes out water. Dryers next (evaporation). Size press starches paper (sealing, treating). Redry. Calender puts a smooth surface on paper. Wound up. Trimmed. Sold.

[signature] 1/13/91

Lubricating → 300/500 gallon tanks in each shop to collect waste lubricants (4). when full, pumped to waste oil AST. started mid 70. hauled 1 to 2 times a year. Have analysis - nonhaz.

All production water from K. River. WWTP has water well. 300 people employed ~100 acres.
Fences → manufacturing part / not along river.
→ landfills restricted access.
24 hr. security. 3 shifts.
~370 tons / day production.

Spills / releases other than LUST none.
Prior overflow to river discontinued.
Now to city WWTP. Happened once.
No floods reached facility.

NPDES - non-contact cooling discharge, applied for renewal - 1985

Air permits - one #5 boiler coal-fired for power / steam for dryers. 40% of electrical needs
No permit for Safety Kleen / 3 of them.
But reported emissions

[signature] 1/13/91

PCB transformers. 7 left.
retrofilling.

Release from vandalized Transformer in late 70's. Transformer in old unused building. Soil removal will get more info.

Kalamazoo River is a Superfund NPL site.
G-P is one of the PRP's

Started Facility tour at 930.

1) Bldg 311. Receiving of waste paper.

Photo 1 dumpster - scrap bands west 950

Hydropulper - tanks / pumps for added chemicals (deinker, caustic)

2) 303 sewers in floor.

Photo 2 screened material dumpster north 1000

Photo 3 Flotation cells northeast 1006

Slime mold / bacteria killed w/ methylene bis (thiocyanate)

Rmo Cattell 11/13/91

Photo 4 binding wire waste bin (recycled) west 1011

Photo 5 scrap boxes/paper dumpster in shipping area west 101

4) Machine shop
Photo 6 Safety Kleen parts washer north 1019

5) Compactor - municipal solid waste
Photo 7 north 1025

Photo 8 30 yd roll off 1035
crushed barrels.

6) Maintenance mill 4 Photo 9 waste oil portable tank 103
Bldg. 404 north

7) Haz Waste Storage 14' x 50' 2" ramp
Photo 10 door south 1042

- Unused oil dry sausages
- Flouresent light ballasts - nonhaz not labeled
- grease

Photo 11 room west 1044
Photo 12 ballast drum south 1046
Photo 13 non haz drums east 1049
(NH_3OH & water)

Rmo Cattell 11/13/91

8) Basement under machine #8

water / pulp yellow stain (dye)
empty drums; oil, acid, dye

9) Machine #8

10) Paint area

Photo 14 1105 west Bldg 8/102
Sat. Accum. drum paint waste
1 drum closed.

11) Intercept station for all
waste water. screened big scrap
in dumpster.
Photo 15 north 1112

12) Clarifier / Sludge Press

Photo 16 southwest dried sludge 1120
17 southeast clarifier 1122

- 4.5 - 5 mil gal day WW
- 150 cu. yds day sludge.

Rose Cutt 11/13/91

13) Scrap metal bin
Photo 18 west 1125

14) Used oil tank
Photo 19 east 1130
Inside diked area - cracked concrete.

15) Coal ash

Blue silos - fly ash baghouses
Gray silo - bottom / fly ash storage

Photo 20 east 1131

ash trucked out to type III LF

16) Gas Tank LUST
Photo 21 west 1135

17) #6 residual ~~Diesel~~, fuel oil, kerosene LUST area
Photo 22 east 1140

18) Ammonia tank area
Photo 23 north 1145

Rose Cutt 11/13/91

1200 Broke for Lunch and buy new film.

19) Photo 1 (new roll) 1310 northwest.
King's Hwy LF photo from south entrance cell 2.
Cells 1 & 2 filled. Cells 3 & 4 old lagoons.
~~RC~~ fence open.

20) Allied LF
Photo 2 North 1326
old field - type veg. fence partial.
locked gate.

Photo 3 SE 1330
bare patch - site of boring

21) Willow Blvd. LF
fenced, locked gate, not yet closed.

Photo 4 riprap on river SE 1340.
5 Trees on LF SE 1342

Finished tour at 1350.

Russ Cutt
11/13/91

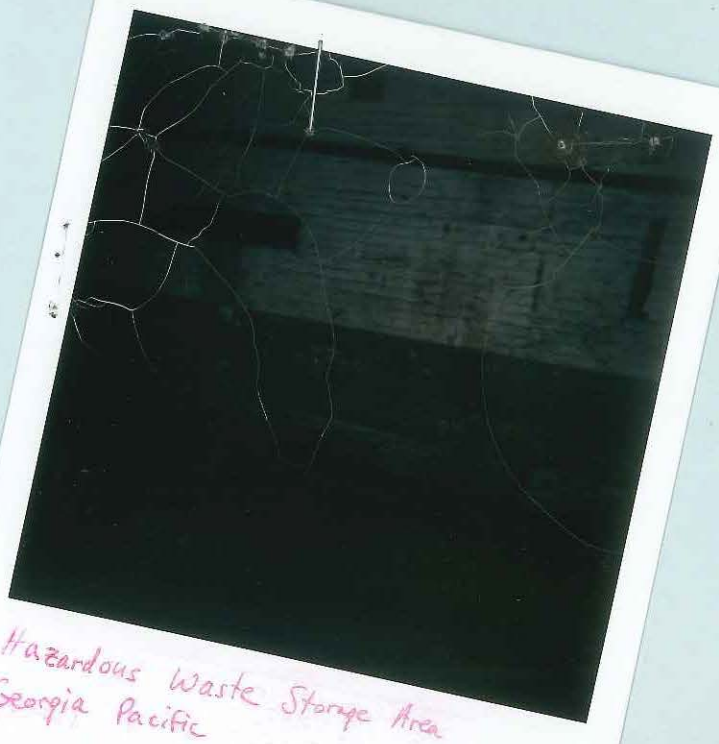
Laboratories — paper test stations in Bldg 113
- central lab since - 1984
prior - unknown date

trial chemicals, new coatings, etc.
cleaned out old reagents, etc. this year manifested.

Finished wrap-up and left facility at 1500.

Russ Cutt
11/13/91

Hazardous Waste Storage Area
Georgia Pacific
MID 042 441 022



Hazardous Waste Storage Area
Georgia Pacific
MD 042 441 022

GEORGIA PACIFIC CORPORATION

KALAMAZOO PAPER DIVISION

CHEMICAL ANALYSIS OF SAMPLE COLLECTED AT

PAPER WASTE MATERIAL FILTER PRESS ON

- JUNE 8, 1980 -

TABLE I

Federal Safe Drinking Water Standards	PARAMETERS	LABORATORY AND TEST				
		Western Michigan Environmental Services, Inc. Water Shake Extraction Leachate (mg/l)	Environmental Research Group Water Shake Extraction Leachate (mg/l)	Environmental Data, Inc. Water Shake Extraction Leachate (mg/g)[1]	Environmental Research Group Acidic Leachate (mg/l)	Environmental Data, Inc. Acidic Leachate (mg/g)[1]
N.S.	Total Solids (%)	24.03	24.2	49.5	24.2	49.5
500 mg/l (S)	Total Dissolved Solids	1065	160	7.03	450	40.8
N.S.	Total Volatile Solids (%)	64.11	60.1	63.6	60.1	63.6
6.5-8.5 (S)	pH (S.U.)	6.0	4.9	8.0	5.0	4.8
N.S.	Chemical Oxygen Demand	566	110	5.75	550	<.65
N.S.	Nitrogen, Ammonia	<1.0	0.015	0.0008	0.030	0.0013
10 mg/l (P)	Nitrogen, Nitrate	<0.1	0.21	0.0029	0.18	0.0015
N.S.	Nitrogen, Nitrite	0.002	N.D. (D.L.: 0.01)	<0.0008	N.D. (D.L.: 0.01)	<0.0008
N.S.	Nitrogen Organic	6.0	1.2		4.2	
N.S.	Nitrogen, Total Kjeldahl	---	---	0.0073	---	0.0048
N.S.	PCB (pmg/l)	<0.001	---	---	---	---
N.S.	PCB 1242 (ppb)	---	N.D. (D.L.: 0.08)	N.D. (D.L.: 0.08)	N.D. (D.L.: 0.05)	N.D. (D.L. .08)
N.S.	PCB 1254 (ppb)	---	N.D. (D.L.: 0.11)	---	N.D. (D.L.: 0.08)	---
N.S.	PCB 1260 (ppb)	---	N.D. (D.L.: 0.21)	N.D. (D.L.: 0.08)	N.D. (D.L.: 0.14)	N.D. (D.L. .08)
N.S.	Phenol	0.11	0.055	0.0009	N.D. (D.L.: 0.003)	0.0031
250 mg/l (S)	Sulfate	14	N.D. (D.L.: 1)	0.154	4.0	0.076
N.S.	Total Hydrocarbons	<1.5	0.11	.250	N.D. (D.L.: 0.01)	.307
N.S.	Total Organic Carbon	207	38	2.17	200	0.396
0.5 mg/l (P)	Metals: Arsenic	<0.03	0.0006	<0.02 ug/g	0.002	<0.02 ug/g
1.0 mg/l (P)	Barium	1.2	0.23	0.0006	0.59	0.0145
0.010 mg/l (P)	Cadmium	0.01	N.D. (D.L.: 0.003)	<0.0001	N.D. (D.L.: 0.003)	<0.0001
N.S.	Calcium	135	37	0.606	88	2.10
0.05 mg/l (P)	Chromium (total)	<0.02	N.D. (D.L.: 0.0002)	<0.0002	N.D. (D.L.: 0.005)	0.0004
1 mg/l (S)	Copper	0.02	N.D. (D.L.: 0.005)	0.0002	N.D. (D.L.: 0.005)	0.0007
.3 mg/l (S)	Iron	1.6	0.28	0.0028	1.6	0.0428
0.05 mg/l (P)	Lead	0.1	---	---	---	---
0.05 mg/l (S)	Manganese	0.37	0.063	0.0014	0.22	0.0101
0.002 mg/l	Mercury	<0.002	N.D. (D.L.: 0.0002)	0.0028 ug/g	N.D. (D.L.: 0.0002)	0.0020 ug/g
N.S.	Nickel	0.11	N.D. (D.L.: 0.010)	---	0.025	---
N.S.	Potassium	0.38	0.36	0.0485	0.68	0.0687
0.01 mg/l (P)	Selenium	<0.03	0.002	0.04 ug/g	N.D. (D.L.: 0.001)	<0.02 ug/g
0.05 mg/l (P)	Silver	<0.02	N.D. (D.L.: 0.003)	<0.0001	N.D. (D.L.: 0.003)	0.0001
N.S.	Sodium	5.6	7.5	---	9.3	---
5 mg/l (S)	Zinc	0.06	0.035	<0.0002	0.41	0.043

D.L. - Detectable Limit
N.D. - None Dectected
N.S. - No Standards
(P) - Primary Maximum Contaminant Level
(S) - Secondary Maximum Contaminant Level
1 - Calculations of analysis converted back to solid measurement; values may not be compared to mg/l.

Source of Date: Laboratory Results as listed in Appendix B.

Georgia-Pacific Corporation *2425 King Highway*
Kalamazoo, Michigan 49001
Telephone (616) 382-2890

December 12, 1985

SOLIDS WASTE MANAGEMENT ACTIVITIES

In response to Questions 1 and 2 of the Certification Regarding Potential Releases From Solid Waste Management Units form, it would be proper to first explain our solid waste activities.

The solid wastes that exist at our plant come from our paper manufacturing process. Our excess process water is pumped out to our Sludge Plant where it goes thru a primary clarifier and a filter press operation during which the water is filtered out and the remaining solids are pressed together to form our sludge. This sludge is approximately 50% clay but it also contains paper fibers and fillers (see attached sample sheet). The excess water is pumped to the City of Kalamazoo Wastewater Treatment Plant and our sludge is transported in dump trucks to our landfill which is approximately 1/4 mile south of our plant and is twenty to thirty acres in area. Under normal operating conditions we generate six to eight tons of sludge per day.

Attached is a detailed analysis sheet of our sludge which should help you in determining our status.

If there are any questions concerning this matter, call 349-0310.

Rodney D Woods

Rodney D. Woods

RDW:ddc

NOV 05 1985

CERTIFICATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Georgia-Pacific Corporation

EPA I.D. NUMBER: MID 042441022

LOCATION CITY: 2425 King Highway, Kalamazoo

STATE: Michigan 49001

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SOLID WASTE BRANCH
U.S. EPA, REGION V

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill	X	X
° Surface Impoundment		X
° Land Farm		X
° Waste Pile		X
° Incinerator		X
° Storage Tank (Above Ground)		X
° Storage Tank (Underground)		X
° Container Storage Area		X
° Injection Wells		X
° Wastewater Treatment Units	X	
° Transfer Stations		X
° Waste Recycling Operations		X
° Waste Treatment, Detoxification		X
° Other _____		

RECEIVED
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U.S. EPA, REGION V

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

See Attached Sheets

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

COPY 2

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

   N/A

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

   N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Rodney D. Woods, Environmental Engineer

Typed Name and Title

Rodney D Woods

Signature

12/12/85

Date

CONTINUING RELEASES AT PERMITTED FACILITIES

SEC. 206. Section 3004 of the Solid Waste Disposal Act is amended by adding the following new subsection after subsection (t) thereof:

"(u) CONTINUING RELEASES AT PERMITTED FACILITIES.—Standards promulgated under this section shall require, and a permit issued after the date of enactment of the Hazardous and Solid Waste Amendments of 1984 by the Administrator or a State shall require, corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit under this subtitle, regardless of the time at which waste was placed in such unit. Permits issued under section 3005 shall contain schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action.".

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DEQ

ENVIRONMENTAL RESPONSE DIVISION

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Company/Division: EPA

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SENT FROM:

Name: Brian Von Gunten

Section/Division:

Phone:

TOTAL NUMBER OF PAGES (INCLUDING THIS COVER SHEET): 13

Georgia Pacific Mill, Kalamazoo

COMMENTS: (1) 2 Page Fact Sheet on Lagoon Removal

(2) Map showing general location of 2 Lagoons (1 page)

(3) Description of Mill History - 6 pages

(4) Mill Characteristics in 1992. - 3 pages

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INFORMATION BULLETIN

ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER SUPERFUND SITE
Georgia-Pacific Mill Lagoons
Kalamazoo, Michigan

FACT SHEET

This document describes removal activities performed by Georgia Pacific Corporation at the former Georgia-Pacific Corporation Mill Lagoons. The purpose of the action was to prevent direct release of polychlorinated biphenyls (PCB) to surface water. PCB containing soils and paper-making residuals were excavated to achieve the industrial cleanup criteria for direct contact with soil. PCB-containing soils, sediment, and paper residuals were also excavated from the floodplain next to the Mill Lagoons. Once removed, the materials were consolidated into the King Highway Landfill. The landfill is now capped and covered.

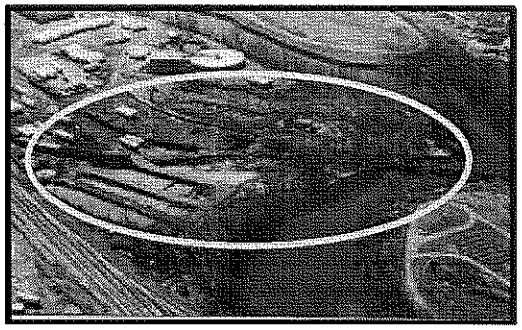
Key Facts:

facility address: 2425 King Highway (northwest of KHL)
total area: approximately 182,000 square feet

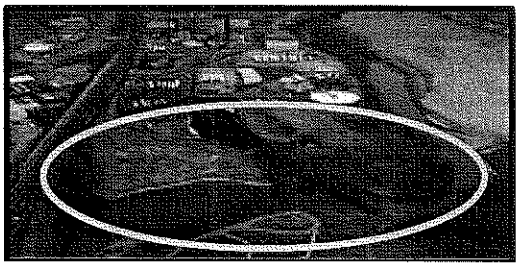
Excavation Activities (Nov. 1998-Sept. 1999):

approximately 33,000 cubic yards of materials were removed from five Mill Lagoons
approximately 5,000 cubic yards of materials (to the edge of the river) were removed from the floodplain area as an interim response
several soil piles adjacent to Mill Lagoons 1, 2, and 3, (as well as debris in the lagoons) were removed
the lagoons were excavated down to native soils to achieve the industrial cleanup criteria (9.9 mg/kg)
material was removed based on visual cleanup criteria
ten drums were found in Mill Lagoon 1 in November of 1998; the drums were moved off-site for disposal, lab results showed that the material was non-hazardous
two clarifiers were discovered at the east end of Lagoon 1 in December 1998, the contents were removed and the clarifiers were backfilled with approved clean material
water from excavation activities was treated on site and discharged
all material was transported to the King Highway Landfill

Post-excavation sampling was conducted by the Michigan Department of Environmental Quality (MDEQ). Areas within the floodplain were found to have PCB concentrations higher than allowed. Re-excavation occurred in September 1999, and included the removal of all visible residuals.



Georgia-Pacific Mill Lagoons Before Action



Georgia-Pacific Mill Lagoons After Action

MID042441022

Site Restoration:

after the removal of the residuals and verification sampling, the areas were backfilled and covered with six inches of topsoil and grass seed
approximately 400 feet of stone riprap, (5 feet wide and 6 inches thick) was placed on top of geotextile and placed along the Kalamazoo River for erosion control

For more information about the interim remedial action at the Georgia Pacific Mill Lagoons, please contact:

Project Managers
Brian von Gunten
Keith Krawczyk
MDEQ-ERD Superfund Section
P.O. Box 30426
Lansing, Michigan 48909
Phone: 517-373-6808; Fax: 517-335-4887

→ who is taking lead at U.S. EPA

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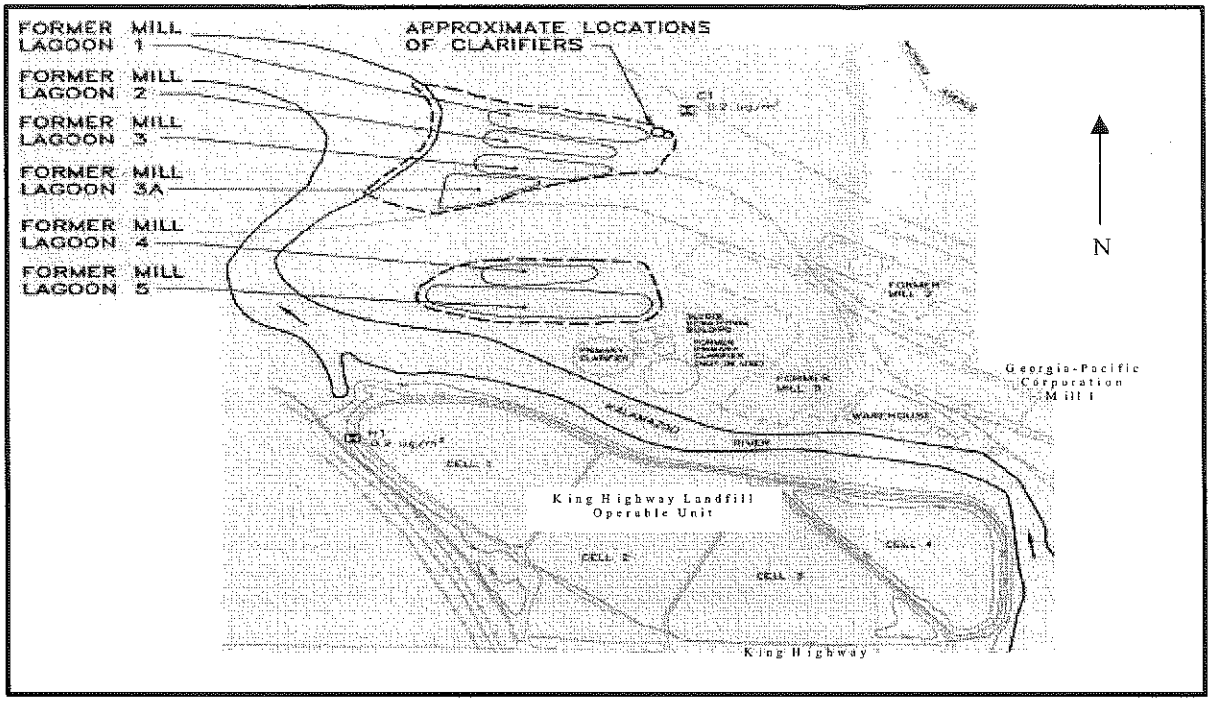
EQC4469 (REV 5/97)

Georgia Pacific Mill Lagoons

Map prepared by Blasland, Bouck & Lee, 2000



Superfund Site History/ Background

On August 30, 1990 the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund site was officially included on the National Priorities List (NPL) pursuant to the Comprehensive Environmental Response, Compensation and Liability Act 1980 PA 96-510.

The site was placed on the NPL list because the soils, sediments, water column and biota in and adjacent to the Kalamazoo River and a three mile stretch of Portage Creek are contaminated with polychlorinated biphenyls (PCBs), a hazardous substance and possible human carcinogen.

The Michigan Department of Environmental Quality has identified three paper companies as Potentially Responsible Parties (PRPs). The PRPs are Allied Paper Inc./Millennium Holdings, Inc. (currently Millennium Holdings, Inc.), Georgia-Pacific Corporation, and Simpson Plainwell Paper Company (currently Plainwell, Inc.). All three paper companies, which collectively refer to themselves as the Kalamazoo River Study Group (KRSG), have signed an Administrative Order by Consent with the MDNR and agreed to fund and conduct the Remedial Investigation/Feasibility Study (RI/FS). The actions in this fact sheet were completed under a separate Administrative order by Consent (AOC-ERD-99-010) for the King Highway Landfill.

Information Repositories

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Douglas, Michigan
(616) 857-8241

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Charles Ransom Library
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Plainwell, Michigan
(616) 685-8024

Kalamazoo Public Library
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Kalamazoo, Michigan
(616) 342-9837

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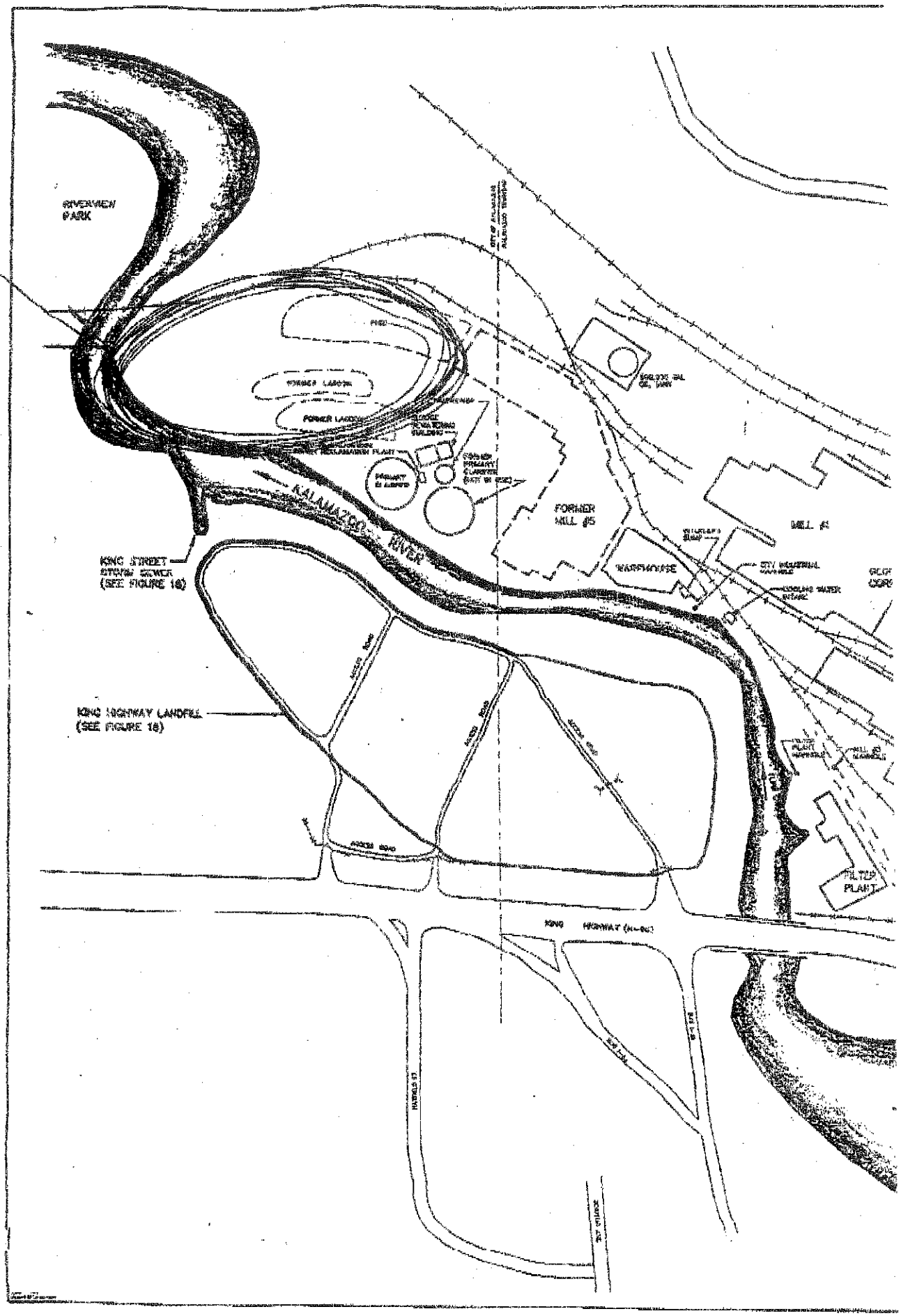
FIG 16 LAGOONS
RIVERVIEW PARK
FORMER LAGOON
FORMER LAGOON
SLUDGE DEWATERING BUILDING
WASTEWATER RECLAMATION PLANT
PRIMARY CLARIFIER
KALAMAZOO RIVER
FORMER MILL #5
WAREHOUSE
MILL #4
KING STREET STORM SEWER (SEE FIGURE 18)
KING HIGHWAY LANDFILL (SEE FIGURE 18)
ACCESS ROAD
FILTER PLANT
KING HIGHWAY
HARRIS ST

discharge in the King Street storm sewer is not apparent and the inward section of the meander appears filled with vegetation occurring.

The physical plant is unchanged in the 1974 aerial photograph (Figure 42). The elongated north-south running lagoon is filled and vegetated. The lagoon to the northeast is still visible, however it appears that vegetation is encroaching into the lagoon. The 110-foot diameter clarifier has been removed and the smaller clarifier appears to be operating. There is no evidence of wastewater discharge in the sewer and the inward section of the meander is filled and vegetated.

In the 1981 aerial photograph (Figure 43), significant changes are visible. The mill and small clarifier have been razed and material has been removed. The lagoons are filled and vegetation is apparent on the property. The inward section of the meander is filled and vegetated. The 1986 aerial photograph (Figure 44) shows no apparent change from the 1981 photograph. The aerial photograph taken in 1991, and shown on Figure 45, again shows no change in the property occupied by the Mill except the Michigan Baricade West, Inc. building. To the northeast of Michigan Barricade West, Inc. is an automobile scrap yard.

3.5 Georgia-Pacific Corporation Kalamazoo Mill

3.5.1 Paper-Making Operations

The Georgia-Pacific Corporation Kalamazoo Mill, located on King Highway (Figure 18), was originally owned by the Wolverine Paper Company

until it was sold to the Kalamazoo Paper Company in 1899. Georgia-Pacific Corporation purchased the Mill in 1967.

The original facility consisted of five mills: three paper mills and two coating mills. Mills 1, 2, and 3 were the paper mills, and mills 4 and 5 were used for finishing and converting operations (Figure 18). Mill 2 was razed in the early 1970s and Mill 5 was razed in the 1980s. Mills 1 and 3 are the current paper mills, while Mill 4 is used as a storage area.

The Kalamazoo Paper Company started deinking waste paper in the 1950s at Mills 1 and 3. However, PCBs did not appear in waste paper until 1967. Mill 1 stopped deinking in the late 1970s. The deinking process used before the late 1960's at Mill 3 started with a conveyor and a pulper. Chemicals that were added included caustic soda, solvents, soda ash, and tetrasodium tripolyphosphate. Pulp was sent to a screw press, then to a washer. All wastewater went to a sewer. Mill 3 stopped deinking in the late 1960s and resumed in 1975. The eleven chests used in the deinking process and the old floor drains were torn down and replaced with a new system in 1975. The conveyor and pulper are still present.

Currently, the company produces 400 tons per day of bond, offset, label, coated, and recycled grades of paper (Lockwood-Post, 1991). The raw material used comprises 50 percent waste paper and 50 percent virgin pulp (Wilkins & Wheaton, 1981).

Included in the Georgia-Pacific property is the location of the former Hawthorne Paper Mill, located at the eastern edge of the site (Figure 18).

KES040183

Hawthorne Paper began manufacturing high grade bond, ledger, and printing paper in 1912, mainly from rag stock. Hawthorne's specialty was watermark paper (Kalamazoo Gazette, June 24, 1934). Although the mill recycled paper, the recycle stock was pre-consumer waste paper and did not require deinking. The company shut down in 1976 and the mill was purchased by Georgia-Pacific in 1978. Shortly after its purchase, the mill was torn down.

The former National Gypsum Company plant is located just south of Mill 4 and is surrounded by Georgia-Pacific property. The company produced gypsum board liner until its closing in 1988. Presently, the building is owned by Kalamazoo Township.

3.5.2 Water Pollution Control and Waste Management

In 1954, the Kalamazoo Paper Company constructed a 110-foot diameter clarifier for primary treatment of its process waste. Previously, all industrial wastewater from the mills was discharged to the Kalamazoo River. During operation, wastewater flowed from the mills to a centrally located intercept station, which pumped the mill effluent to the clarifier. Overflow from the clarifier went to the Kalamazoo River, while underflow was pumped to the adjacent lagoons. Several lagoons and a clarifier located to the northwest of the plant were also used at this time to treat wastewater from Mill 2. The King Highway dewatering lagoons were constructed on the opposite side of the river in the late 1950s for dewatering the underflow from the clarifier. The lagoons adjacent to the clarifier were subsequently used as emergency lagoons until 1980, when they were excavated and the

material was taken to the King Highway Landfill. Currently, they are partially backfilled with soil.

Mill 2, which housed two paper-making machines, did not conduct deinking. The mill and its wastewater treatment facilities ceased operations in 1970.

Beginning in 1964, the clarifier's effluent was sent to the Kalamazoo wastewater treatment plant for secondary treatment and the underflow, which contained two to four percent solids, was pumped to the King Highway dewatering lagoons. The supernatant from the lagoons was returned to the clarifier. Periodically, the lagoons were excavated and the waste material was sent to the Willow Boulevard Site (Figure 21) until 1975 when the Willow Boulevard Site reached capacity. After 1975, dewatered residuals from the King Highway dewatering lagoons were excavated and disposed of at the A-Site (Figure 23).

In 1977, Georgia-Pacific updated their entire waste treatment system by installing a new 135-foot diameter primary clarifier, a 50-foot diameter sludge thickener, and two dewatering presses. These presses increased the solids content of the waste to 40-50 percent. The waste could then be trucked directly to the A-Site from the dewatering presses.

The former King Highway dewatering lagoons started to receive residuals from the filter press when the A-Site reached capacity and closed in 1987. The King Highway Landfill is currently the Georgia-Pacific Kalamazoo Mill's licensed Type III landfill.

KB50402835

3.5.3 History from Aerial Photographs

Georgia-Pacific Corporation

The five mills which constitute the Kalamazoo Paper Company Mill are shown in the 1938 aerial photograph (Figure 37). The Hawthorne Paper Company Mill and National Gypsum Company are also shown on property adjacent to the Kalamazoo Paper Company. No entrances to the property from King Highway are evident; traffic enters from Michigan Avenue between Mills 1 and 2. There is an apparent discharge into the river south of Mill 1.

The mill structures are essentially unchanged in the 1950 aerial photograph (Figure 38). An entrance now exists off of King Highway in addition to the Michigan Avenue entrance. The apparent outfall to the river and mill vegetation appear the same as they did in the 1938 photograph.

The filter plant is under construction in the 1955 aerial photograph (Figure 39), while the remainder of the mill structures are unchanged. The primary clarifier constructed in 1964 appears to be operating. Two lagoons appear to the west of the clarifier. Three lagoons and a clarifier also appear on the property of the Kalamazoo Paper Company to the northwest of the mill. A clarifier is also under construction at the Hawthorne Mill and a discharge to the river is evident. An entrance parallel to Hawthorne's drive is present, leading to Mill 3. The outfall south of Mill 1 is no longer visible; however, there is a discharge apparent near the new clarifier.

In the 1960 photograph (Figure 40) construction of the filter plant, along with a warehouse near Mill 5, is complete. There are no visible

outfalls of wastewater to the river. Hawthorne's clarifier is in operation; however, no outfall discharging to the river is apparent.

The administration building and corresponding entrance first appear in the 1967 photograph (Figure 41). No outfall is apparent in the photograph. A clarifier is also in operation at the eastern edge of the National Gypsum plant. Also, another clarifier is evident near the three lagoons to the northwest of the mill.

In the 1974 photograph, Mill 2 is razed and an oil tank is present at the location (Figure 42). The lagoons to the northwest of the mill appear filled. Hawthorne's clarifier is absent and National Gypsum's clarifier appears to be out of service.

Georgia-Pacific's new primary clarifier is in operation in the 1981 photograph (Figure 43). The sludge thickener and dewatering facility are also present. The Hawthorne Mill was razed in 1978 and does not appear in the 1981 photograph.

In the 1986 photograph, Mill 5 is absent (Figure 44). One of the emergency lagoons by the clarifier is no longer visible, and the other has been filled with soil. The lagoons and clarifiers to the northwest of the mill are no longer visible. In the 1991 photograph, no major changes subsequent to the 1986 photograph are evident (Figure 45).

King Highway Landfill

The location of the present King Highway Landfill as it appeared in 1938 is shown in Figure 37. In this photograph, the most notable feature

covers currently present on these lagoons. Trespassers on the property may also experience dermal or incidental ingestion exposures to lagoon contents.

Off-site exposures to PCB-containing material originating from the mill area are unlikely. At this time, off-site migration of mill area media has not been observed.

4.8 King Highway Landfill

4.8.1 Characteristics

The King Highway Landfill (Figure 19) is bordered to the south by M-96 (King Highway), to the east and north by the Kalamazoo River, and to the west by the Grand Trunk Railroad right-of-way and the King Street storm sewer. The landfill lies within the city of Kalamazoo and Kalamazoo Township.

The 23.3-acre landfill is located east of Riverview Park, formerly named Sutherland Park, and Red Arrow Golf Course, which are built on top of a former Kalamazoo city dump. The dump closed in the early 1950s and contains all types of domestic and commercial waste (Wilkins & Wheaton, February 1982c). South of the landfill is a maintenance yard for the city of Kalamazoo which formerly contained an asphalt plant, and now has a salt storage facility, and equipment for road work and snow removal. Superior Metal Shredder, Inc./Superior Salvage Co./Superior Industrial Waste Disposal Service lies to the west (Wilkins & Wheaton, February 1982b).

4.7 Georgia-Pacific Corporation Kalamazoo Mill

4.7.1 Characteristics

The Georgia-Pacific Corporation (Figure 18) is located at 2425 King Highway in Kalamazoo, Michigan. It is bordered to the south by the King Highway (M-96) and to the southwest and west by the Kalamazoo River.

The Kalamazoo Mill presently consists of three of the original five mills. Mills 1, 2, and 3 were originally the paper mills, and Mills 4 and 5 were used for finishing and converting operations. Mill 2 was razed in the early 1970s and Mill 5 was razed in the 1980s. Mills 1 and 3 are the current paper mills, while Mill 4 is used as a storage area. Mills 1 and 3 were originally used for deinking. Mill 3 is now the deinking mill, which uses a new deinking system installed in 1975.

Several former lagoons exist to the west and northwest of the mill. These are presently covered with vegetation except one which is filled with water. The current waste-treatment system at the mill consists of a 135-foot diameter primary clarifier, a sludge thickener, and two dewatering presses. The former primary clarifier is located adjacent to the current one.

Also included in the Georgia-Pacific property is the area where the former Hawthorne Mill stood. The mill was torn down in the late 1970s. The the former National Gypsum Company building is located south of Mill 4.

H650462899

4.7.2 Potential Exposure to PCB-Contaminated Media

Land use surrounding the Georgia-Pacific Corporation Kalamazoo Mill is primarily secondary business and commercial. The mill property includes a manufacturing area, waste-treatment facilities, and several former lagoons and the former primary clarifier in the western end of the property. Access to the manufacturing area of the mill is restricted by the Kalamazoo River to the southwest and a perimeter fence to the south, east, and north. In addition, a 24-hour security guard is posted at the entrance off of the King Highway.

Current uses of the area include on-going manufacturing and waste treatment activities. Mills 1 and 3 are currently in operation, and production water is obtained from the Kalamazoo River. Both mills were used for deinking; however, deinking was discontinued at Mill 1 in the late 1970s. Mill 3 still serves as a deinking operation. This mill was retrofitted with entirely new equipment in the mid-1970s.

Potential receptor populations at the mill include Georgia-Pacific employees involved in production and maintenance operations at the mills, and maintenance employees active in the vicinity of the former lagoons and primary clarifier. Production employees may be exposed to Kalamazoo River water during production-related tasks. Potential routes of exposure for maintenance employees include direct dermal contact and possible incidental ingestion of surface soils during general plant maintenance, and similar exposures to lagoon solids during maintenance of the lagoon areas. Exposures to lagoon solids will be mitigated by the vegetative and water

K830402900

Gerald Phillips /R5/USEPA/US
12/02/2004 03:13 PM

To

Subject Fw: Region 5 sites that could benefit from CERCLA $$$

FYI
----- Forwarded by Gerald Phillips/R5/USEPA/US on 12/02/2004 03:12 PM -----

Sara Rasmussen/DC/USEPA/US
12/02/2004 01:22 PM

To

Subject Region 5 sites that could benefit from CERCLA $$$

Tom -

Region 5, Gerry Phillips, has gotten back to me on the question of whether they could use some CERCLA funds put into a Superfund contract to help them work on EIs for RCRA sites. Gerry suggested the following two sites as a starter. He indicated they have more sites if there are more funds available.

Du-wel, Michigan, MID005422514
This GPRA facility was making fairly good progress until they got into financial difficulty this past year, activities stopped. Region 5 just referred it to CERCLA this week. Superfund has said they'd evaluate it this year, then decide what type of priority they'd put on it. If CERCLA had some funding, they might be able to finish the investigation phase and get some controls in place to help meet EIs. This may take somewhere in the $50K range (very rough estimate)

Georgia Pacific, Michigan MID042441022
There was a mill, they have some problems with some dump areas, waste water pipe leakage, and a transformer pad. Went out of business last year. Region 5 has been working with them to make some progress. Superfund agreed last April to take it over. They are going to finish investigation of some above and below ground storage tanks areas. It would help them if they had some additional money to make some additional progress. Unclear what the costs would be for this. 50K would be a good start.

Sara Rasmussen
U.S. EPA
703-308-8399

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

Date: December 1, 2004

Subject: Referral of RCRA Subtitle C Corrective Action Facility to CERCLA

From: Gerald W. Phillips, Corrective Action Manager
Waste, Pesticides and Toxics Division

To: Joseph Dufficy, Chief
Brownfield/Early Action Section

The facility is currently known as: Georgia Pacific Corp., U.S. EPA ID No. MID042 441 022 located at 2425 King Highway, Kalamazoo, Kalamazoo County, Michigan, 49003.

The RCRA program has determined it is most advantageous that the Superfund program address the cleanup responsibilities at this facility. Because Superfund has taken responsibility for the cleanup of this entire facility, the Superfund program will be tracking its progress under their (e.g., GPRA) measures. The facility will continue to be tracked on the RCRA program's GPRA Baseline or measures. A summary of the current status of the facility is attached.

If you accept this referral, please signify your acceptance by signing the certification below. Please return the executed certification to me.

Superfund accepts the referral of the facility.

Joseph Dufficy, Chief
Brownfield/Early Action Section

Gerry — 12/7
This site is now associated with the Allied Paper NPL site.
Jan
(11)

cc: George Hamper, ECAB, WPTD
Hak Cho, WMB, WPTD

Attachments :

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

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_____ _____
Joseph Dufficy, Chief Date
Brownfield/Early Action Section

cc: George Hamper, ECAB, WPTD
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If you accept this referral, please signify your acceptance by signing the certification below. Please return the executed certification to me.

Superfund accepts the referral of the facility.

_____ _____
Joseph Dufficy, Chief Date
Brownfield/Early Action Section

cc: George Hamper, ECAB, WPTD
Hak Cho, WMB, WPTD

Attachments :

Date: 4-15-04

Subject: Transferral of Georgia Pacific (MID042441022) from RCRA to Superfund Program

From: Hak Cho, Chief,
Corrective Action Section

To: Gerry Phillips
Corrective Action Team

Last month Georgia Pacific of Kalamazoo, Michigan was included on the Headquarters list of highly significant facilities as part of the non-GPRA FY' 2008 baseline. However, we have learned in our recent coordination with Shari Kolak of the Region 5 Superfund program that RCRA elements cited in a 1992 Preliminary Assessment - Visual Site Inspection (PA/VSI) RCRA report will be addressed as part of an ongoing Superfund cleanup. (See Ms. Kolak's note, attached.)

In addition, there is one other Solid Waste Management Unit (identified in the PA/VSI report as SWMU # 4 - Wastewater Treatment and Dewatering Presses) that is most likely of relatively low environmental significance (i.e. because there have been no documented releases). However, by agreement with Shari Kolak on April 6, 2004, this SWMU will be addressed by Superfund through a documentation request. Then, if necessary and based on review of this information, it may be added to the list of RCRA units to be remediated under Superfund authority.

Therefore, I recommend that we formally transfer remediation responsibility of this site to Superfund and that Headquarters delete this site from its draft FY 2008 RCRA baseline.

If you have any questions or concerns regarding this memorandum, please contact Allen Debus of my staff at (312) 886-6186.

Attachment: April 2, 2004 memo from Shari Kolak to Allen Debus

cc: Shari Kolak, Superfund

Allen Debus
04/06/04 10:27 AM

To: Shari Kolak/R5/USEPA/US@EPA
cc:
Subject: Re: question about Georgia Pacific

okay - sounds good.

Shari Kolak

Shari Kolak
04/06/04 10:27 AM

To: Allen Debus/R5/USEPA/US@EPA
cc:
Subject: Re: question about Georgia Pacific

Allen,

Yes, that's what I meant. Shari
Allen Debus

Allen Debus
04/06/2004 10:25 AM

To: Shari Kolak/R5/USEPA/US@EPA
cc:
Subject: Re: question about Georgia Pacific

Shari:
I like your suggestion of asking for documentation & then maybe if it wasn't properly addressed tacking it on? Is that what you meant? I'll mention this in the memo I write for Hak to sign, which will be addressed to Gerry.
Allen

Shari Kolak

Shari Kolak
04/05/04 05:10 PM

To: Allen Debus/R5/USEPA/US@EPA
cc:
Subject: Re: question about Georgia Pacific

Allen,

Yes, I read the description and wasn't sure myself. I chose to leave it out because it sounded like "containing the WWTP residuals" sounded more like a management practice at the time they were in operation. Because the contractor said there was no documented releases from this SWMU, I thought it might not be worth investigating. However, to be safe we can always add it back to the list of RCRA units and I can tell GP they need to give us documentation on this one as well. Shari
Allen Debus

Allen Debus
04/05/2004 12:53 PM

To: Shari Kolak/R5/USEPA/US@EPA
cc:
Subject: question about Georgia Pacific

Shari:

In drafting my memo I rechecked the old PA/VSI report and noted one SWMU which isn't mentioned in your memo for which the contractors had recommended further action. I know you don't have the file in front of you today, but here I'm referring to SWMU # 4, "Wastewater Treatment and Dewatering Presses." The 1992 recommendation was to 'contain spills of WWTP residuals,' which is a rather nebulous sounding phrase. (At least I don't know exactly what they meant.)

On p. 31 of the PA/VSI it mentions that "no releases have been documented directly from this SWMU..... The concrete pad is in good condition, but there was some spillage of residuals on the ground in the area."

Can we leave this one out of the SF program possibly because it is not as highly significant as the other areas? Do you think because of past remediation that any issues associated with this SWMU may have already been addressed? What's the Superfund spin on this?

Allen

Allen Debus
04/06/04 10:25 AM

To: Shari Kolak/R5/USEPA/US@EPA
cc:
Subject: Re: question about Georgia Pacific

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Can we leave this one out of the SF program possibly because it is not as highly significant as the other areas? Do you think because of past remediation that any issues associated with this SWMU may have already been addressed? What's the Superfund spin on this?

Allen

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DATE: April 2, 2004

SUBJECT: **Georgia Pacific Mill, Kalamazoo Michigan**

FROM: **Shari Kolak, Remedial Project Manager**
Superfund Division

TO: **Allen Debus, RCRA Corrective Action Project Manager**
RCRA Program

The purpose of the memorandum is acknowlege our programs' willingness to address the RCRA units, identified in the 1992 Preliminary Assessment/Visual Site Investigation (PA/VSI) report, under the scope of future Superfund response actions at the former Georgia Pacific Mill property located in Kalamazoo, Michigan.

In June 2003, Georgia Pacific formally requested that EPA delist their Kalamazoo mill property and citing that all remedial action had been taken with the exception of three areas. Georgia Pacific submitted a workplan to address a refuse area, wastewater pipeline, and a transformer pad. At that time, we told Georgia Pacific they would also need to address all RCRA units, identified in the PA/VSI report, that require further investigation. We explained that before we can delist a site, the Superfund program will need to make the determination that no hazardous substances, pollutants, or contaminants exist at the Site that would cause harm to public health or the environment. Since we are already working with Georgia Pacific to delist their mill property, it makes sense to address the RCRA units at the same time. The RCRA units we asked them to investigate are:

a) 1,000-gallon Waste Oil AST
b) Fuel Oil and No. 6 Residual Fuel Oil UST Area
c) Gasoline UST Area
d) Ammonium Hydroxide UST Area

The PA/VSI Report also identified the need for groundwater monitoring at three other areas: Willow Boulevard landfill, A-Site landfill, and the King Highway landfill. These landfills are being addressed under EPA and/or MDEQ lead separate from the mill property.

Georgia Pacific has indicated they have closure documentation and/or groundwater data that suggests no further action is needed at the RCRA units. We are currently waiting for an updated workplan/report that incorporates these findings. We will continue to work with Georgia Pacific toward the goal of delisting their property and will keep the RCRA program informed of our progress.

Allen Debus
03/18/04 03:37 PM

To: Hak Cho/R5/USEPA/US@EPA
cc: Shari Kolak/R5/USEPA/US@EPA
Subject: Re: your phone call.

Here's my quick & dirty Agenda for our 3/23 meeting:

1. RCRA status of Georgia Pacific - MID042441022

2. PA/VSI Recommendations (from 11/91 report)

3. To what extent is Superfund program addressing AOCs mentioned in PA/VSI recommended for further action/remediation?

4. GPRA CA-725 & CA-750 RCRA goals.

5. Should RCRA transfer Georgia Pacific to Superfund & if so, how should this be done? (What's the procedure?) * what should be said?

Allen

Hak Cho

Hak Cho
03/18/04 11:53 AM

To: Allen Debus/R5/USEPA/US@EPA
cc: Shari Kolak/R5/USEPA/US@EPA
Subject: Re: your phone call.

Al, - I don't think we need an attroney for this meeting. Thanks, Hak

Allen Debus

Allen Debus
03/18/04 11:16 AM

To: Shari Kolak/R5/USEPA/US@EPA
cc: Hak Cho/R5/USEPA/US@EPA
Subject: Re: your phone call.

Hak:
Shari posed the question as to whether we'd advise having someone from ORC present at our meeting next Tuesday. Offhand, I don't think we do, but you may have another opinion.
Allen

Shari Kolak

Shari Kolak
03/18/04 10:28 AM

To: Allen Debus/R5/USEPA/US@EPA
cc:
Subject: Re: your phone call.

Sounds good...do you need an attorney present?
Allen Debus

Shari Kolak/R5/USEPA/US @EPA

06/25/02 09:31 AM

To: Allen Debus/R5/USEPA/US@EPA
cc:
Subject: Telephone conference with Michael David, counsel for GP

Allen,

Here's a follow up e-mail from my attorney regarding the Georgia Pacific property. Shari
---------- Forwarded by Shari Kolak/R5/USEPA/US on 06/25/2002 09:55 AM ----------

From: Eileen Furey on 05/20/2002 03:48 PM CDT

To: Shari Kolak/R5/USEPA/US@EPA
cc:
bcc:

Subject: Telephone conference with Michael David, counsel for GP

Shari,

I just got off the phone with Michael Davis, counsel for GP. You may remember that you had sent him a copy of the RCRA report for the GP property.

As so many of these PRPs seemed to believe, GP thought that its mill property was not part of the SF site. They seemed to think that because the state failed to respond to Technical Memo 15 (which I haven't read but which I'm starting to believe came to the conclusion that no further action was warranted for any of these mills) then they were safe from further government oversight.

I told Michael that, as far as I knew right now, EPA did consider the GP mill property to be part of the SF site. When we took over the site, it was with the understanding that the river, the landfills and the mill properties were included in its definition. I told him that if he could show me that the contamination identified in this RCRA document, as well as any other potential PCB contamination, had been addressed previously, we may consider changing our mind. But for now, at least, GP's mill seems to be an area where contamination has come to be located.

So now he is going to start figuring out which of the SWMUs have been addressed, and which still need to be addressed.
At some point in the not-too-distant future, we will need to get word to these PRPs that their mill properties will need to be at least investigated and probably remediated.

Eileen

Date: May 13, 2002

Subject: Non-GPRA (High Priority) site - Georgia Pacific - MID042441022

From: Allen A. Debus

To: Hak Cho, Supervisor (WMB-CAS)

This is a 'single file' facility, the paper trail for which essentially 'dead-ends' following the March 18, 1992 PA/VSI report. Georgia Pacific (GP) is situated within the vicinity of the Kalamazoo River Superfund site.

The facility operated 13 SWMUs, including two landfills, wastewater treatment plant dewatering presses, and a 1,000 gallon AST, which were recommended for further monitoring and/or remediation. There are also 3 AOCs which authors of the 1992 PA/VSI report believed should be the focus of groundwater monitoring. Wastes and constituent releases, resulting from processes associated with paper manufacturing, included paint thinner, laboratory chemicals and - during retrofitting of electrical transformers - PCBs. Because GP closed its hazardous waste drum storage unit in 1985, a RCRA permit was never issued. There is no formal mechanism or instrument in place directing how site remediation should take place, although Superfund maintains a localized, controlling 'presence.'

Shortly after the PA/VSI report was completed, in July 1992, a Description of Current Situation report was prepared for the affected Superfund area, inclusive of GP facility portions. By late 1998, Superfund's involvement escalated to a major restoration of PCB-contaminated soils and Mill lagoon sediments to an industrial cleanup level of 9.9 ppm. Through its remediation strategy, Superfund intended to sever the soil/sediment-to-surface water pathway. Removed materials were consolidated into the King Highway Landfill, which is now capped and covered.

According to project manager Shari Kolak, future phases of activity are planned at GP, tentatively scheduled for implementation by 2003/2004. Until I informed her of its existence, Shari had no knowledge that a RCRA PA/VSI had been completed. After sharing the PA/VSI report with her, Shari acknowledged that any 'loose-end' RCRA matters would be addressed under scope of future GP/Kalamazoo River cleanup phases. Following discussion with Hak Cho, during which it was determined that a site inspection would not be needed, I sent the following E-mail note to Shari Kolak on 4/17/02.

> To reiterate from my voicemail message left earlier this morning, here is my current position on Georgia Pacific - MID 042441022..

1. We see advantages in allowing Superfund to continue taking lead responsibility in cleaning up SWMUs which were cited in the March 1992 RCRA PA/VSI. We are aware of your successes with the King's Highway Landfill already, and that there are plans forthcoming to implement cleanup within the next couple of fiscal years at two other old landfill areas situated on GP's property - Willow Blvd, and the "A" Landfill. (This latter information was partly gleaned from MDEQ representatives several weeks ago.) We would ask that in the planned ROD the SWMUs # 4 and 11 be addressed per our RCRA PA/VSI's recommendations (possibly as ARARs?). We can remain in communication in this regard so that the RCRA concerns become incorporated into Superfund actions.

2. Like Superfund, we have vested interest in EI's (Environmental Indicators). Can you divulge the EI status for the GP property? We would like to know if (or when) the site has met EI criteria for human health exposure to haz. constituents and also groundwater migration.

3. Presently, I see no immediate need for visiting the GP facility. However, I will also communicate my position to GP representatives so they do understand their obligations under RCRA, even though we would prefer to see these activities completed under a Superfund 'mechanism' or ROD instrument.

This site would not benefit from a VCAA, as considerable site remediation has already transpired under Superfund's jurisdiction, and because further RCRA cleanup elements may be addressed under Superfund as well.

Allen Debus
04/17/02 11:03 AM

To: Shari Kolak/R5/USEPA/US@EPA
cc:
Subject: Georgia Pacific

Shari:

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3. Presently, I see no immediate need for visiting the GP facility. However, I will also communicate my position to GP representatives so they do understand their obligations under RCRA, even though we would prefer to see these activities completed under a Superfund 'mechanism' or ROD instrument.

If you have further information or wish to discuss this later, please phone me at 6-6186.

Take care,
Allen

Shari: Basis for looking at RCRA

NPL 1990 listing

① – Allied Pp. Paper
35 miles + maybe 40 miles in

– Allied Paper Mill

– Portage Creek

State – Anywhere cont. has been located all Mill Property

SF → GP Mill Property
not agreeing
any potential releases

no threats to public health
+ environment
including RCRA
+ other units GP
volunteered not
in RCRA report

–

–

– property.
Hawthorn
property ~~own~~ GP
owns it
ox Bow Lake
high PCBs

MID042441022

Shari Kolak
03/12/04 04:47 PM

To: Allen Debus/R5/USEPA/US@EPA
cc:
Subject: Re: Fw: New Baseline of facilities for 2008

Allen,

GP is now revising their June 2003 mill delisting workplan to include the SWMUs and 3 AOCs identified in the RCRA PA/VSI report. GP says they have closure documentation on the SWMUs and groundwater data on the AOCs that show they are no longer a concern. Once we receive the workplan, our folks will determine whether the SWMUs and AOCs have been adequately addressed. However, there are 3 known areas of contamination: the refuse area, former pipeline, and oxbow area on former Hawthrone mill property. GP wants to excavate these areas and place the conatiminated material in the Willow Blvd./A-Site landfill, which is across the highway. We think this is a good idea and are working out the details now.

Sorry about not being under 20 words.... Shari

Allen Debus

Allen Debus
03/11/2004 01:33 PM

To: Shari Kolak/R5/USEPA/US@EPA
cc:
Subject: Fw: New Baseline of facilities for 2008

Shari:
In twenty words or less, what can I mention to Hak about the current status of Georgia Pacific?
Allen

----- Forwarded by Allen Debus/R5/USEPA/US on 03/11/04 01:33 PM -----

Hak Cho
03/11/04 01:25 PM

To: Allen Debus/R5/USEPA/US@EPA
cc:
Subject: Re: New Baseline of facilities for 2008

Al,
Please fill me in a little bit more details about Superfund's involvement on Georgia Pacific site.
Thanks, Hak

Allen Debus

Allen Debus
02/26/04 03:42 PM

To: Gerald Phillips/R5/USEPA/US@EPA
cc: Hak Cho/R5/USEPA/US@EPA
Subject: Re: New Baseline of facilities for 2008

Questions & FYI:

I looked up 3 sites on the attached table, two of which have associated bankruptcy issues. These two are # 206 (Du-Wel) and # 360 (Uretech/Motor Wheel). Is it possible these might be dropped from the list?

Also, I had a Georgia Pacific site, possibly # 208 (Georgia Pacific) which is being handled by

Superfund currently. When would or shouldn't this be reflected in the Table?

Of course, if any of my sites fall off the list I would anticipate 'replacement' sites to be assigned.

Allen

Gerald Phillips

Gerald Phillips
02/26/04 10:25 AM

To: Jonathan Adenuga/R5/USEPA/US@EPA, Kenneth Bardo/R5/USEPA/US@EPA, Christopher Black/R5/USEPA/US@EPA, Mirtha Capiro/R5/USEPA/US@EPA, Robert Egan/R5/USEPA/US@EPA, Todd Gmitro/R5/USEPA/US@EPA, Donald Heller/R5/USEPA/US@EPA, Thomas Manning/R5/USEPA/US@EPA, Thomas Matheson/R5/USEPA/US@EPA, Nate Nemani/R5/USEPA/US@EPA, Tamara Ohl/R5/USEPA/US@EPA, Daniel Patulski/R5/USEPA/US@EPA, Patricia Polston/R5/USEPA/US@EPA, Peter Ramanauskas/R5/USEPA/US@EPA, Juana Rojo/R5/USEPA/US@EPA, Gregory Rudloff/R5/USEPA/US@EPA, Allen Wojtas/R5/USEPA/US@EPA, George Hamper/R5/USEPA/US@EPA, Hak Cho/R5/USEPA/US@EPA, Brian Freeman/R5/USEPA/US@EPA, Juan Thomas/R5/USEPA/US@EPA, John Gaitskill/R5/USEPA/US@EPA, Allen Debus/R5/USEPA/US@EPA, David Petrovski/R5/USEPA/US@EPA, Carolyn Bury/R5/USEPA/US@EPA, GARY CYGAN/R5/USEPA/US@EPA, Tammy Moore/R5/USEPA/US@EPA, John Nordine/R5/USEPA/US@EPA, Bhooma Sundar/R5/USEPA/US@EPA, Mario Mangino/R5/USEPA/US@EPA, Colleen Olsberg/R5/USEPA/US@EPA, Daniel Mazur/R5/USEPA/US@EPA
cc: Margaret Guerriero/R5/USEPA/US@EPA, Estelle Patterson/R5/USEPA/US@EPA, BRUCE SYPNIEWSKI/R5/USEPA/US@EPA, Willie Harris/R5/USEPA/US@EPA
Subject: New Baseline of facilities for 2008

I have attached what we believe will be the final GPRA Baseline for 2008. Facilities in the 2008 baseline will have to achieve 95% CA725 human health risks controlled, 80% CA750 ground water migration controlled, 30% CA400 remedy selected and 20% CA550 remedy constructed. We are still in discussion with OSW regarding the status of bankrupt facilities and whether or not they should/must be added to our list. If we are unsuccessful in our arguments the number of facilities could increase above the 401 facilities on this baseline list.

Gerry

2008 GPRA Baseline final.›

Gerald W. Phillips
Corrective Action Program Manager
Waste, Pesticides and Toxics Division