



# EPA Reviews Landfill Permit; Requests Public Comment

Lower Fox River and Green Bay Site  
Northeast Wisconsin

July 2006

## Public comment period

EPA will accept written comments on the draft permit for the Georgia-Pacific landfill Cell 13A from July 14 to Sept. 12, 2006. This fact sheet provides a form for you to send your comments to EPA. Comments may also be faxed to Susan Pastor, EPA community involvement coordinator, at (312) 353-1155 or sent via the Internet at: [r5tsca@epa.gov](mailto:r5tsca@epa.gov). Comments must be postmarked no later than Sept. 12.

## Public meeting

EPA will hold a public meeting to explain the application and draft permit process, answer questions and solicit comments on the draft permit. EPA will accept oral and written comments at the meeting:

**Date:** Aug. 23, 2006

**Time:** 7 p.m.

**Place:** Brown County Library  
Auditorium  
515 Pine St.  
Green Bay

If you need special accommodations to attend this meeting, please contact Susan Pastor at least one week before at (800) 621-8431, Ext. 31325, weekdays 9 a.m. – 4:30 p.m.

## EPA Web site

This fact sheet, the TSCA permit application, draft permit, and other related documents can be found at: [www.epa.gov/region5/sites/foxriver](http://www.epa.gov/region5/sites/foxriver)

U.S. Environmental Protection Agency is evaluating an application to construct a new disposal area, or cell, within an existing industrial waste landfill on the west side of Green Bay (see map on Page 7). If approved, the permit would allow the landfill to accept additional PCB-contaminated sediment dredged from the Lower Fox River.

Use of the landfill for sediment disposal is key to restoring the river. Sediment contaminated with PCBs, or polychlorinated biphenyls, would be removed from the river, where it is potentially harmful to aquatic life and people, and permanently and safely confined in a place where no one can come in contact with it. EPA decided in its 2002 and 2003 cleanup plans (called records of decision) that landfill disposal is the safest and most cost-effective means for dealing with dredged sediment, and now wants to hear the public's opinions and concerns about using Green Bay West landfill for this purpose.

The application for the Green Bay West landfill was submitted by the Fort James Operating Co. (a wholly owned subsidiary of Georgia-Pacific Corp.), one of the companies EPA considers potentially liable for the Lower Fox River cleanup. The company owns and operates the landfill on its property in Green Bay on State Highway 172 across from the Austin Straubel International Airport. EPA has determined that Georgia-Pacific's proposal meets the requirements of the Toxic Substance Control Act, the federal law that regulates disposal of PCBs. EPA's draft permit is available for public comment until Sept. 12 (see box at left for details).

Before deciding on whether to approve a new cell, EPA will consider all public comments received. Based on public comment, EPA could issue a permit, decide not to allow the use of a newly constructed cell, or add conditions to the permit to improve the cell's performance or safety. Most helpful to EPA are comments that provide new information or evaluate the technical merits of Georgia-Pacific's application or EPA's draft permit. If EPA decides to give Georgia-Pacific a permit, the Agency will provide a written response to comments in a document called a "responsiveness summary."

Note: EPA is aware that some residents would like the Agency to consider other options for dredged sediment. EPA and the Wisconsin Department of Natural Resources thoroughly and repeatedly evaluated other options prior to issuing the cleanup plan in 2003, and decided landfilling was the best option. While the Agency believes other disposal options are less viable, we will continue to evaluate others as new information becomes available. It is important for commenters to be aware that EPA can only consider those disposal sites for which it has received an application. EPA has received an application only from Georgia-Pacific.

## Landfill proposal

The application submitted to EPA by Georgia-Pacific requests approval to use a portion of the existing Green Bay West landfill for disposal of PCB-contaminated sediment dredged from the Lower Fox River. The work would include:

- Preparing a specially designed disposal area, or cell, within the existing landfill owned by Georgia-Pacific, to accept the sediment. The area, called

Cell 13A, would be graded and filled with 48 inches of compacted clay and other layers designed to prevent leakage (see diagram on Page 4).

- Filling the cell with PCB-contaminated sediment beginning in 2007.
- Pumping out liquid, or leachate, from the landfill and testing the levels of PCBs.
- Releasing leachate to Green Bay's wastewater treatment facility if PCB levels are below 3 parts per billion (ppb is a measurement of chemicals in water). Treating leachate on site if levels are 3 or more ppb, then releasing treated water to Green Bay's facility.
- Monitoring the mechanical systems (leachate and ground-water pumping) to be sure the cell's safeguards are working properly.
- Testing the air for PCBs and airborne dust according to an EPA-approved monitoring plan and changing work practices if needed.
- Closing the cell when it reaches capacity, including installation of a cover (see diagram on Page 4).
- Continuing to monitor after closure.

**What is leachate?** Leachate is simply liquid contained in a landfill. Leachate can form from rain mixing with contaminants in the landfill or come from squeezing excess moisture from sediment compacted in the landfill.

## Questions and answers

EPA has received lots of questions pertaining to the landfill application approval process, the Superfund cleanup process and people's health issues. Answers to some of these questions follow.

### **Superfund**

Superfund is the common term for the federal law laying out the process used to clean up polluted places, like the Lower Fox River, contaminated many years ago. EPA and DNR have been following Superfund regulations since 1998 to study the river and plan for its cleanup. Much more about the Lower Fox River cleanup is available on EPA (see front page) and DNR ([www.dnr.wi.gov/org/water/wm/foxriver](http://www.dnr.wi.gov/org/water/wm/foxriver)) Web sites and in document files at the libraries listed on the back page.

### **I've heard that EPA issued "records of decision" calling for landfilling as the solution for PCB-contaminated sediment. What is a record of decision?**

A record of decision is an official EPA document that describes the selected cleanup for a Superfund site or part

of one. It is a technical document that provides information necessary for designing the cleanup components and which outlines cleanup goals for the selected plan.

### **Is a record of decision required for the proposed new cell within the Georgia-Pacific landfill?**

No. A ROD is not required because the cell is a means of disposing of PCBs (TSCA regulations), not a process for cleaning up PCBs (Superfund regulations).

### **Permit approval process**

#### **How does EPA's approval process differ from DNR's?**

DNR's role is to determine whether a "plan of operation modification" approval should be issued to Georgia-Pacific to allow it to accept higher levels of PCB-contaminated sediment from the Lower Fox River. (This landfill has accepted paper mill waste since 1964, and PCB sediment from a Lower Fox River demonstration project in 1999 - 2000). DNR has been reviewing an application to see if the landfill is suitable for the change in usage and recently held a public comment period and meeting.

EPA's role is to review Georgia-Pacific's "application for coordinated approval" to determine if its landfill would qualify as a PCB disposal site. The Agency uses DNR's findings on the plan of operation modification. Under the coordinated approval process, EPA cannot issue a final approval to Georgia-Pacific for disposal of PCB-contaminated sediment in Cell 13A if DNR disapproves the plan of operation modification.

#### **Why is only the Georgia-Pacific site being considered?**

Georgia-Pacific is the only entity that has come forward with a potential disposal site. It has an existing landfill that could potentially accept this type of waste. No other applications have been received.

#### **Why isn't the town of Holland being considered?**

The owners/operators of landfills in the town of Holland have not submitted an application for a PCB disposal permit. EPA cannot consider a disposal site unless the owners of a particular site indicate they will seek a permit for that location and submit an application.

#### **Who is responsible if something goes wrong?**

Under the federal TSCA law, the owner/operator is responsible for the operation, performance and monitoring of the landfill under federal and state oversight. In this case, Georgia-Pacific would be responsible for the perpetual maintenance of the landfill and for identifying and correcting any problems, as well as notifying EPA of any situation that could lead to a release of PCBs from Cell 13A.

### **Why would EPA grant a waiver to the TSCA-required 50-foot separation between the surface and underground water supplies?**

While EPA requires a 50-foot separation between the base of the landfill and the top of the ground-water table, this separation cannot typically be met because the water table is too high in this part of the country. EPA usually waives this requirement but only in exchange for more protective features, so we actually get a better landfill. These features include a double clay liner and a double leachate collection system. A well-engineered landfill with these upgraded features can adequately protect the ground water.

### **Why isn't EPA considering vitrification instead of landfilling for disposal of PCBs?**

Vitrification is a process that melts the sediment at a very high temperature and turns it into a glass-like material. EPA and DNR have repeatedly evaluated this option. It was originally considered during the initial screening of possible disposal options, and a special analysis was done after EPA issued its 2003 cleanup decision calling for landfilling. Although vitrification has promise, it is much more costly than landfilling and has significant unknowns associated with its implementation. No vitrification facility has been permitted, sited or constructed, nor is community acceptance assured, as PCBs must still be trucked to the facility. There are also air emissions and other waste byproducts associated with the heating process. While estimates have been done, companies that might do the vitrification have not come forward with a firm cost, nor have they been willing to guarantee their performance. On the other hand, landfilling offers a safe, well-proven, cost-effective means for disposing of PCB sediment and can be implemented quickly, allowing the cleanup to move forward. EPA will continue to evaluate vitrification as new information becomes available.

### **What is EPA's public involvement process?**

When EPA determines that a site meets the requirements of TSCA, as EPA has in the Georgia-Pacific case, the Agency prepares a draft permit and makes it available to the public during a comment period. During this time, people have a chance to review the application and draft permit and comment on them. If there is enough interest, EPA holds a public meeting to answer questions and accept comments. If the Agency decides to issue the permit, a final approval document will be prepared. A written summary is also done to respond to those comments pertaining to the landfill.

### **Do public comments really make a difference?**

Yes. EPA solicits, collects and carefully reviews all comments received prior to making a final decision. In making that final decision, EPA takes into account residents' concerns. Even if EPA decides to approve the landfill, public comments may lead the Agency to require additional safety and health measures at the facility.

### **Health concerns**

#### **What health problems are associated with landfilling PCB sediment?**

Simply living near a landfill does not cause health problems. There has to be a way for people to come in contact with the PCBs (called exposure) by touching, eating, breathing or drinking. Unlike the town dumps of the past, today's modern landfills prevent contact with the waste. They are constructed with containment liners and leachate collection systems. Water and air are monitored as required by federal and state laws. Isolation of PCBs in a landfill is much safer than allowing PCBs to remain uncontrolled in the river.

Eating PCB-contaminated fish is the main route for human exposure, which is why EPA wants to clean up the Lower Fox River. Health effects from exposure to PCBs depend on the duration and concentration of the exposure. People who are frequently exposed to PCBs or exposed to high concentrations are at an increased risk of developing health problems. Some of these problems can include damage to the liver and reproductive and immune systems, interference with the body's hormones, and possibly cancer. PCBs can harm exposed pregnant mothers, fetuses, young children and healthy adults. In the case of the Lower Fox River and its contaminated sediment, PCB exposure generally means eating contaminated fish or fowl. For Lower Fox River sediment, other possible exposure routes such as breathing or absorbing PCBs through the skin were not found to present a significant risk.

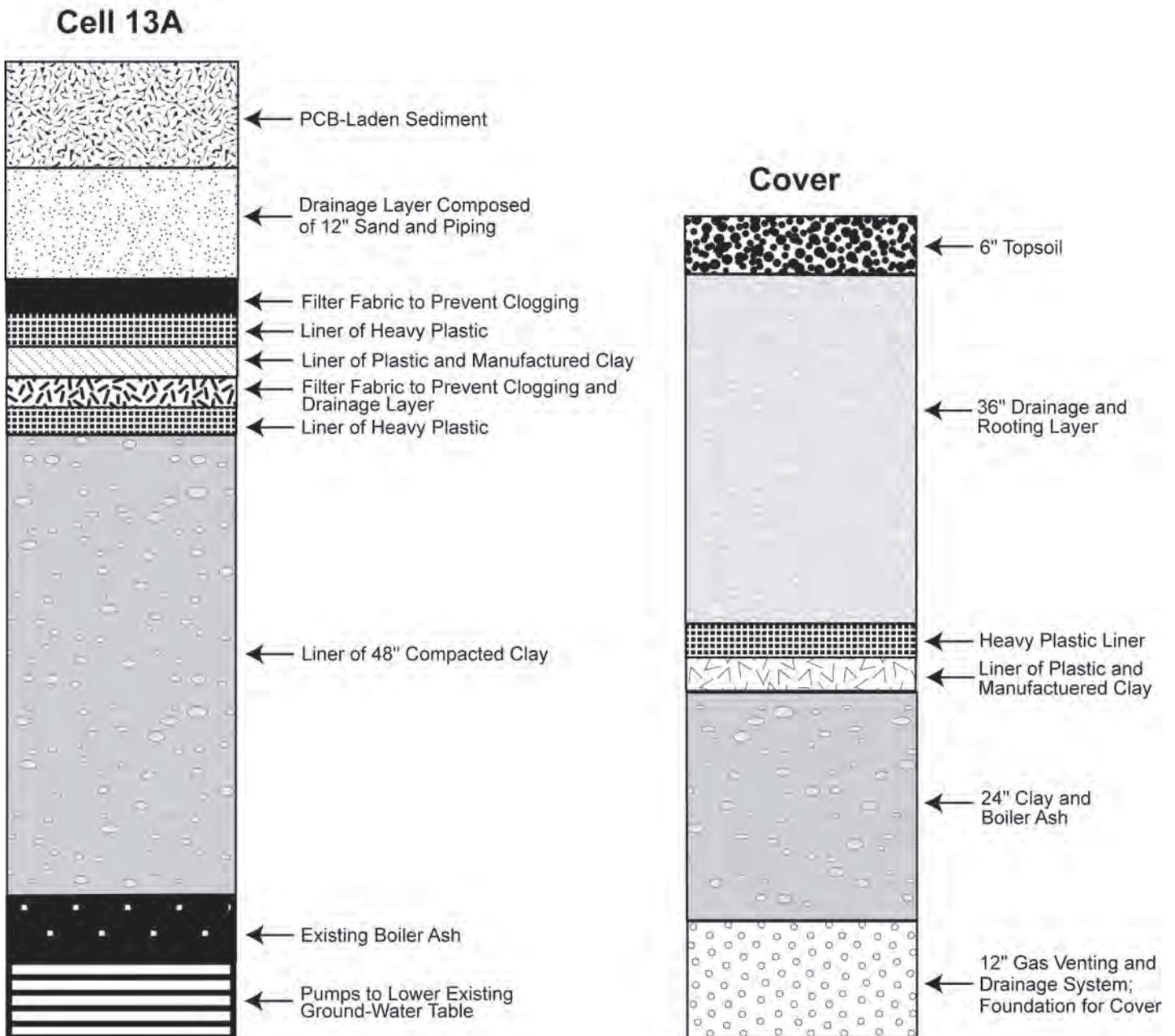
#### **Could cancer or other types of illnesses in the area be related to the landfill?**

Environmental testing done during and after past disposal activities at the Georgia-Pacific landfill has shown that people are not being exposed to chemical contaminants disposed there. State and local public health officials are not aware of increased rates of disease in the area. Concerns about local disease rates are taken seriously, and the state and local health departments will continue to work with those who are worried about their health.

# Inside the Proposed Green Bay West Landfill Cell 13A

Unlike the town dumps of the past, modern landfills include numerous safeguards to prevent leakage of contaminated liquid (leachate) into underground sources of fresh water (ground water) and nearby lakes and streams. At Cell 13A, PCB-laden sediment would be placed over a thick layer of clay and a series of specially designed plastic and clay "liners" to contain liquid in designated zones and collection systems to pump leachate from the cell.

When the cell reaches capacity, a permanent cover will be placed on top as shown in the diagram below. If you were to slice the cell like a cake, this is what it would look like:





# Comment Sheet

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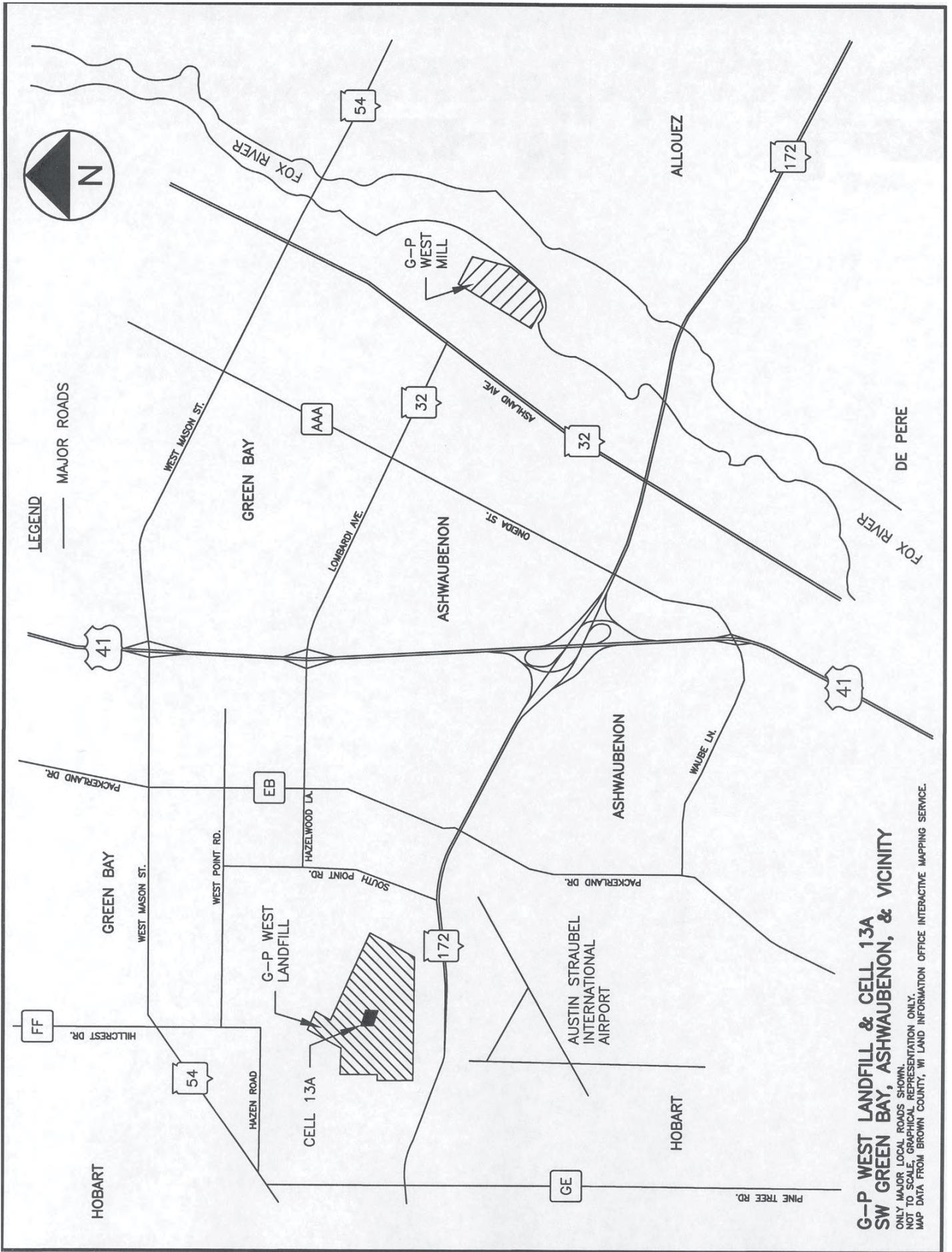
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Place  
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## For more information

If you want to know more about the Georgia-Pacific permit application process, please contact:

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## Official records

Copies of the Superfund records of decision, application, draft permit and other documents related to the Lower Fox River cleanup are available in the reference sections of:

Appleton Public Library, 225 N. Oneida St., Appleton  
Brown County Library, 515 Pine St., Green Bay  
Door County Library, 104 S. Fourth Ave., Sturgeon Bay  
Oneida Community Library, 201 Elm St., Oneida  
Oshkosh Public Library, 106 Washington Ave., Oshkosh

## For more information about the Lower Fox River/Green Bay site cleanup:

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