Appleton Wire Division
Post Office Box 1939
Appleton, Wisconsin 54913-1939
Tel 414 | 725 2600



September 20, 1985

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Lake Mich. Dist.

Mr. James Reyburn
Lake Michigan District Headquarters
Department of Natural Resources
P. O. Box 10448
1125 North Military Avenue
Green Bay, WI 54307-0448

Dear Mr. Reyburn:

This letter is written to inform you of conditions existing at the former location of our chrome plant.

Although you are familiar with the facility as a result of prior discussions and inspections, it might be helpful to discuss briefly the history of this site. The facility, located at 714 East Hancock Street, operated as a chrome plating plant for about 20 years. The operation was terminated in June, 1981. Since then, the facility has been used as a storage area. The basement, located near the southeast corner of the building, contained chromic acid tanks at the time of plant operation. When the chrome operation was terminated, most of the equipment was sold to another chrome plater and the remaining equipment was scrapped.

In late 1983, the ceiling, walls, columns, floor and raceways of the basement were powerwashed with a caustic cleaner containing detergents followed by a clean water rinse. The rinse water was pumped out, and through arrangements made with DNR, hauled to the DePere sewage disposal facility. Concentrated sludge was placed into steel barrels and sent to a licensed hazardous waste disposal facility. The remaining pit was powerwashed and rinsed. The raceways were filled with concrete. DNR inspected the facility in January, 1984, and found no need for further action.

All contamination was thought to be removed after this thorough cleaning. Earlier this year, however, seepage was noted in the facility's basement. Water samples were taken that revealed chromium contamination. We promptly retained Soil Testing Services of Wisconsin, Inc., to determine the extent of potential contamination. STS conducted limited soil borings, encountering a very low permeable soil profile circumscribing the basement wall and basement backfill at this site. STS test results confirmed chromium contamination immediately adjacent to the facility.

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We have retained STS to conduct a further site investigation and to propose remedial measures, if necessary, to address these circumstances. Because of the high clay content of the surrounding soils, STS does not believe that rapid migration is likely. Moreover, this area is underneath a large building, which acts as a cap and prevents infiltration of significant amounts of water. The possibility of migration through utility trenches or sand lenses will have to be investigated as well as the possibility of contamination from some other source.

This facility is situated in an industrial area served by a municipal water system. In light of these facts, we do not believe that any threat to health or the environment exists. Even so, we intend to have STS proceed expeditiously with a further site investigation and to recommend, if necessary, appropriate remedial action. We will keep you advised of developments along the way.

Please contact me if you have questions or comments.

Very truly yours,

Daniel E. Bergsma Vice President and

General Manager

sa

cc: U.S. Environmental Protection Agency

Region V

230 South Dearborn Street

Chicago, IL 60604