



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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June 1, 2009

MR RON BUCK
ALBANY INTERNATIONAL
435 SIXTH ST
MENASHA WI 54952

SUBJECT: Department Response to March, April & May 2009 Documents for
Appleton Wire (Albany International), 831 North Meade St., Appleton
WDNR BRRTS #: 02-45-000015

Dear Mr. Buck:

In response to a Notice of Violation issued to Albany International ("Albany") by the Department of Natural Resources ("the Department") on March 6, 2009, Badger Labs & Engineering ("Badger Labs") submitted several documents on behalf of Albany. In accordance with the Cooperative Agreement, signed April 23, 2009, this letter is a written response to the *Written Final Response*, dated April 27, 2009, ("the Final Response") submitted by Badger Labs on behalf of Albany.

The Department received several documents from March through May 2009 in regard to this site. They include the following:

- *Geoprobe Monitoring Well Summary Report*, March 24, 2009
- *Semi-Annual Operation & Maintenance Report Year 2008*, March 24, 2009
- *Annual Operation & Maintenance Report Year 2008*, March 24, 2009
- *Written Preliminary Response*, April 10, 2009
- *Written Final Response*, April 27, 2009

The reports listed above were reviewed in detail to provide a response to Albany's plans for moving forward at the site. This letter will serve to address the four items listed in the Notice of Violation. A more detailed technical response to the reports will follow under separate cover.

Item #1 – Additional investigation to comply with ch. NR 716, Wis. Adm. Code

Albany proposes to install three additional monitoring wells east and northeast of the existing French Drain at some point in the future for preparation of shut-down of the French Drain collection. The locations of these proposed wells are shown on Figure 1 of the Final Response. It appears that the proposed well locations are 908 North Lawe St (source property), 820 North Meade Street (residential property east of the source area) and 802 East Winnebago Street (residential property northeast of the source area). The proposed wells appear to be located in areas that will be useful in evaluating the character of the groundwater plume after shut-down of the French Drain collection. Please note that additional wells may be necessary depending on the data collected from the proposed well locations. The Department recommends Albany consider installing these additional wells during the system evaluation and perform long-term monitoring, if necessary, on a reduced schedule agreeable to the Department.

Albany also proposes to install a nest consisting of a monitoring well and piezometer in the warehouse area, northwest of the basement, to provide groundwater monitoring data in all directions from the source. The locations of these proposed wells are shown on Figure 1 of the Final Response. It appears that the wells are proposed to be located at 908 North Lawe St (source property), inside the building. The proposed wells appear to be located in an area where total chrome concentrations are anticipated to range between 15,000 and 20,000 micrograms per liter (ug/L) in the shallow groundwater. The Department agrees that an additional well nest northwest of the basement is appropriate. The purpose of the well nest should be decided prior to finalizing the distance from the source. Albany proposes to install the nest by June 30, 2009, develop and sample the wells by July 10, 2009 and collect a second sample by August 10, 2009. This time frame is acceptable. The Department requests that Albany electronically confirm each milestone is met by submitting brief electronic mails to jennifer.borski@wisconsin.gov.

After review of the March 2009 Operation and Maintenance ("O&M") reports for 2008 data and *Geoprobe Monitoring Well Summary Report* that includes geoprobe monitoring well data from 2004 through 2008, the Department strongly recommends Albany install a monitoring well in the northwest corner of 802 North Meade Street to assist in the system evaluation. At a minimum, this will need to be performed prior to submittal of a request for closure.

Item #2 – Evaluation of the existing remediation system, including performance (ch. NR 722)

Albany proposes to evaluate the performance of the existing collection and treatment system as well as consider the feasibility of alternative collection and treatment technologies, including in-situ remediation. Albany further proposes to submit the evaluation report by **October 15, 2009** that will include recommendations for changes to the system, if warranted. This time frame is acceptable. The evaluation report should include a detailed time schedule for implementation of the recommendations. If a detailed review and response to the system evaluation report is requested of the Department, the report should be accompanied by the appropriate fee. Please reference ch. NR 749, Wis. Adm. Code.

The Final Response discusses the potential for the City of Appleton to allow for direct discharge to the sanitary sewer and lists a compliance limit of 7 milligrams per liter (mg/L) for total chromium. Please note that the City of Appleton also has a compliance limit of 4.5 mg/L for hexavalent chromium. This limit for hexavalent chromium is likely also applicable and should be considered during evaluation of the system.

Albany states in the Final Response that "direct discharge is felt to be an achievable goal"; however, there is no time frame discussed to achieve direct discharge. This should be discussed in the evaluation report.

Item #3 – Geoprobe monitoring well abandonment documentation (NR 141)

Albany provided the Department with the *Geoprobe Monitoring Well Summary Report*, received March 27, 2009. This report includes abandonment forms confirming the wells were abandoned on April 23, 2009. This satisfies this issue identified in the Notice of Violation.

Item #4 – Commitment to semi-annual reporting (ch. NR 724)

Albany agrees to commit to submitting semi-annual O&M reports for the period of January 1st through June 30th by August 31st and the period of July 1st through December 31st by February 28th of each year. This proposal is acceptable to the Department and satisfies this issue identified in the Notice of Violation.

Please note that under the current remediation system, the semi-annual O&M reports are to include Form 4400-194, pages GI-1 through GI-3, GW-1, GW-4 and all appropriate attachments (reference GW-1, section D). The Department recommends Albany consider including the following in future O&M reports:

1. Residential addresses and property boundaries along Meade Street and at the intersection of Meade and Winnebago Streets;
2. The northern road boundary for Winnebago Street and the boundaries for Meade Street north of the intersection;
3. The 2005 aerial photo as a base for site maps; and
4. A table that summarizes the total pounds of chromium removed per year from the French Drain, the sump and the total for the system.

As stated above, a more detailed response to the March 2009 O&M reports will follow under separate cover.

The Department appreciates your efforts to remediate this site and we look forward to moving forward with the efforts outlined in this letter. Please feel free to contact me with any questions at (920) 424-7887.

Sincerely,



Jennifer Borski
Hydrogeologist
Bureau for Remediation & Redevelopment

Electronic Copy: J. Zalesney, DNR, EE – Rhinelander
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