

State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES  
2300 N. Dr. Martin Luther King, Jr. Dr.  
Milwaukee, WI 53212-3128



July 25, 2016

Casetrack #2016-NEEE-031  
BRRTS# 02-45-000015  
Outagamie County

Mr. Joseph Morone, President & CEO  
Albany International Corporation  
455 Patroom Creek Blvd. STE 206  
Albany, NY 12206

Mr. JP Hammerton, Technical Director  
Albany International Corporation  
3601 Electric City Blvd.  
Kaukauna, WI 54130

CT Corporation Systems, Reg. Agent  
Albany International Corporation  
8020 Excelsior Drive STE 200  
Madison, WI 53717

Dear Mr. Morone and Mr. Hammerton:

Thank you for meeting with the Department of Natural Resources (department) to discuss Albany International Corporation (Albany) and the alleged violation of Wisconsin State Remedial Action Laws located at 908 N. Lawe Street, Appleton, Outagamie County, Wisconsin (site).

Meeting Date: Wednesday, July 20, 2016 at 10:30 a.m.

Location: Department of Natural Resources  
Oshkosh Service Center

Attendance list is attached

Albany explained that hex-chrome is being removed by a chromium recovery system, treated in batches, sampled/recorded and discharged to the City of Appleton's waste water treatment system. Albany performed more soil borings and installed four new monitoring wells in 2014. A second source area was discovered north of the basement within the warehouse.

The department explained that Albany has not complied with the timelines for semi-annual reporting established in their compliance agreement executed with the department on April 23, 2009.

The department explained that the current Supplemental Site Investigation Report (SSIR) submitted to the department on July 12, 2016 is not compliant with chapter NR 716, Wisconsin Administrative Code. The department and Albany agreed to schedule a conference call with Albany's consultant to discuss the technical deficiencies of the SSIR at a later date, which took place the morning of July 21, 2016.

The department explained that the current Remedial Actions Options Report (RAOR) submitted to the department on June 21, 2016 is not compliant with chapter NR 722, Wisconsin Administrative Code. The department and Albany agreed to schedule a conference call with Albany's consultant to discuss the technical deficiencies of the RAOR at a later date which took place the morning of July 21, 2016.

The SSIR and RAOR are to incorporate the original contamination area as well as the new contamination area discovered in 2014. Both areas shall be combined in the SSIR and RAOR and treated/regulated as one site.

As agreed in 2009, semi-annual reports are due within 60 days of the end of each semi-annual reporting period. Jan 1 – Jun 30, 2016: due August 29, 2016 and Jul 1 – Dec 31, 2016: due March 1, 2017 and so on.

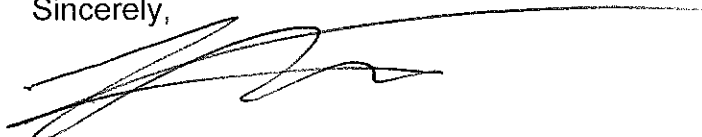
Albany agreed to submit to the department, no later than July 29, 2016, a revised SSIR and RAOR in compliance with ch. NR 716, Wis. Adm. Code., and ch. NR 722, Wis. Adm. Code. The department explained the associated review fees per ch. NR 749, Wis. Adm. Code., as it relates to enforcement actions for the site and Albany.

The department stressed the importance of a timely, comprehensive response due to the age of the outstanding SSIR and RAOR. The department advised that the meeting was the second Enforcement Conference for the site to discuss timeliness of required submittals for the site. Consenter Orders were specifically discussed as an enforcement consideration moving forward.

Discussions centered on the circumstances that gave rise to the NOV and actions taken to date to resolve the alleged violations. Forfeitures and Orders were discussed as was referral to the Department of Justice.

If you have technical questions please contact department Hydrogeologist, Jennifer Borski, at (920) 424-7887. If you have questions regarding this letter please contact me at (414) 263-8663.

Sincerely,



Benton C. Stelzel  
Environmental Enforcement Specialist

Enclosure: Attendance list

c: J. Borski – DNR/NER Oshkosh  
Charles Silva – Albany International Corp./charles.silva@albint.com

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Joseph Gaug – Albany International Corp./joseph.gaug@albint.com  
Rob Biersteker - Luvata Appleton, LLC/rob.biersteker@luvata.com  
Sam Edwards – Luvata Appleton, LLC/sam.edwards@luvata.com  
Dave Casper – Badger Labs and Engineering, Inc./dcasper@badgerlabs.com  
Michael Boozer – Chemreport, Inc./mboozer@chemreport.com  
Pat Gill – Gill & Gill SC./pgill@gillandgillsc.com

# Albany International Corporation

## Sign In Sheet

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Wednesday, July 20, 2016

Name: Benton Stelzel  
Title: Environmental Enforcement Specialist  
Company: Wisconsin Department of Natural Resources  
Phone Number: (414) 263-8663  
Email Address: benton.stelzel@wisconsin.gov

Name: Jennifer Borski  
Title: Hydrogeologist  
Company: DNR  
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Name: DAVID CASPER  
Title: PROJECT MANAGER  
Company: BADGER LABS & ENGINEERING  
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Name: JP HAMMERTON  
Title: TECHNICAL MANAGER  
Company: ALBANY INTERNATIONAL  
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Name: MICHAEL BOOZER  
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