



May 12, 2017

JP HAMMERTON
ALBANY INTERNATIONAL CORP
3601 ELECTRIC CITY BLVD
KAUKAUNA WI 54130

SUBJECT: Conditional Approval of Site Investigation Work Plan and Addendum
for Appleton Wire (Former), 908 N. Lawe St., Appleton, Outagamie County, WI
DNR BRRTS # 02-45-000015

Dear Mr. Hammerton:

On February 1, 2017, the Wisconsin Department of Natural Resources (DNR) received a *Work Scope for Supplemental Site Investigations and Documentation* by Environmental Forensic Investigations, Inc. ("EnviroForensics"), dated January 31, 2017 (the "SIWP"). A review fee of \$700 accompanied the SIWP in accordance with ch. NR 749, Wis. Adm. Code. The DNR verbally requested additional information during a conference call with you and EnviroForensics on March 23, 2017.

After several discussions between DNR and EnviroForensics, the DNR received the *Results of Groundwater Sampling for VOC's*, dated April 28, 2017 (the "VOC Report") and *Addendum to Work Scope*, dated April 27, 2017 (the "SIWP Addendum"), also by EnviroForensics. All reports were submitted on behalf of Albany International Corp. ("Albany") for the environmental case, *Appleton Wire (Former)*, located at 908 North Lawe Street (formerly addressed as 831 North Meade Street), city of Appleton, Outagamie County, Wisconsin (the "Property").

During initial discussion of the SIWP on March 23, 2017, we discussed the potential for historical release(s) of volatile organic compounds (VOCs) from past chrome plating operations. As a result, Albany, EnviroForensics and DNR selected a subset of existing shallow monitoring wells and collection sumps for analysis of VOCs during the routine groundwater monitoring event in April 2017. Results presented in the VOC Report revealed VOCs present in groundwater. VOCs were therefore added to the proposed sampling plan in the SIWP Addendum.

The SIWP Addendum also provided additional clarifications on the proposed supplemental investigation and revised soil and groundwater sampling locations, based on several discussions. The final proposed locations for installation of soil borings, monitoring wells and piezometers are shown on the attached Figure 9, *Site Plan with Proposed Additional Data Collection Points*, revised 4/27/17 by EnviroForensics. On May 5, 2017, the DNR provided EnviroForensics with verbal approval to proceed with drilling activities scheduled to begin on May 8, 2017.

Conditional Approval

The DNR approves of the SIWP with the revisions and clarifications included in the SIWP Addendum with the following conditions:

1. Investigative waste from the 2014 investigation remains on site in violation of storage limitations. This material must be characterized and properly disposed with the investigative waste

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generated during the May 2017 investigation. Transportation and disposal documentation must be submitted to the DNR upon receipt.

2. During discussion on March 23, 2017, you recalled reading that air scrubber equipment was stored and utilized outside of the metal plating building to the north and to the south during historical chrome plating operations. However, specific documentation could not be readily located. Historical placement and connection of air scrubbers and use in the process are important to understand and identify all potential source areas and all contaminants of concern. Any information that can be located to this regard should be included in future reports.
3. All monitoring wells will be installed in accordance with ch. NR 141, Wis. Adm. Code. No temporary wells will be installed as part of this investigation phase.
4. Historical sanitary and storm sewer laterals need to be added to future site maps.
5. The SIWP states, "It is anticipated that the extent of chromium impacts in all Site media will have been determined to the extent practicable for remedial planning upon completion of this investigation. If that is the outcome, then a comprehensive (Site Investigation Report) will be prepared to document all past and present investigation activities following the reporting requirements of Chapter NR 716 of the Wisconsin Administrative Code." The SIWP goes on to state, "...EnviroForensics anticipates that all field work elements can be completed within three (3) months. Another two (2) months will be needed to complete the comprehensive SIR, if the results of this investigation are deemed complete."

By October 12, 2017:

- A. If the degree and extent of contamination is fully defined with this phase of investigation, a SIR and review fee in accordance with ch. NR 749, Wis. Adm. Code should be submitted to the DNR.
 - B. If the degree and extent of contamination is not fully defined with this phase of investigation and additional investigation is needed, a written status update documenting the results of this investigation and a supplemental site investigation work plan with a schedule for implementation should be submitted to the DNR along with the appropriate review fee in accordance with ch. NR 749, Wis. Adm. Code.
6. Historical groundwater monitoring included annual sampling and analysis of total and hexavalent chromium from all monitoring points in April along with quarterly sampling and analysis in a subset of the monitoring points. A **revised groundwater monitoring plan** should be developed based on the results of this phase of investigation and incorporated into the submittal(s) due **October 12, 2017.**
 7. A Remedial Action Options Report (RAOR) is due 60 days after submittal of a SIR along with the appropriate review fee in accordance with ch. NR 749, Wis. Adm. Code.
 8. Routine groundwater monitoring should continue at the existing wells during site investigation. S. NR 716.14, Wis. Adm. Code requires responsible parties to notify property owners and tenants of sampling results from their relative property within 10 days of receipt of the data unless otherwise approved by the DNR. A template notification letter (Form 4400-249) is available on the internet to assist responsible parties with this notification and can be found at

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the following link: <http://dnr.wi.gov/files/PDF/forms/4400/4400-249.pdf>. Albany should contact all property owners with monitoring points located on their property and establish a reporting schedule acceptable to all parties. The schedule(s) should then be submitted to the DNR for approval.

9. Operation and maintenance (O&M) of the groundwater collection and treatment system should continue during additional site investigation, system optimization and remedial action options evaluation activities. Semi-annual submittal of O&M Reports with required NR 712 certifications must be submitted in accordance with s. NR 724.13(3), Wis. Adm. Code.

Thank you for your work on this complex project. Please contact me in Oshkosh by phone at 920-424-7887 or by email at jennifer.borski@wisconsin.gov with any questions in regard to this letter.

Sincerely,



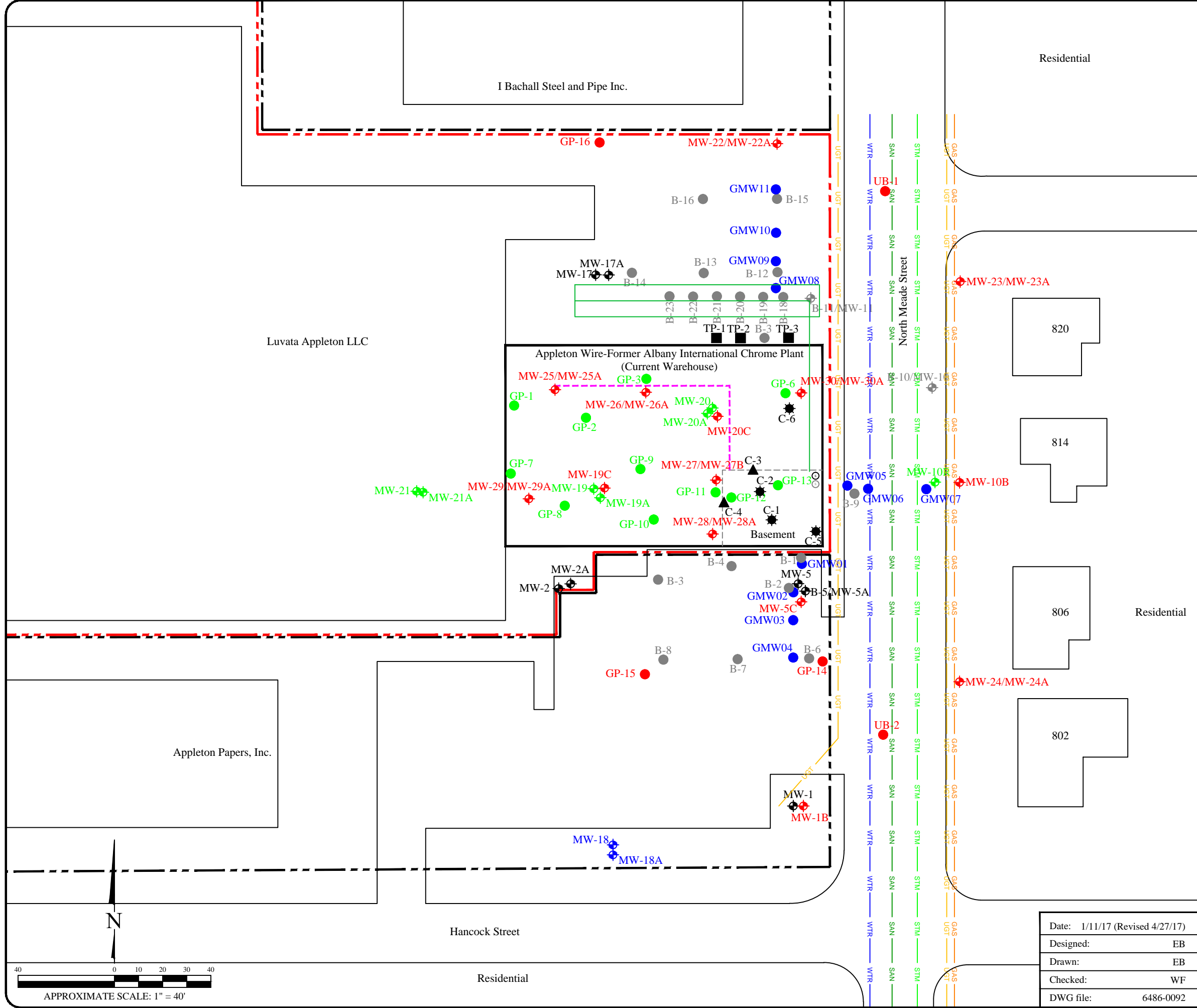
Jennifer Borski
Hydrogeologist
Remediation & Redevelopment Program

Attachment:

- Figure 9, *Site Plan with Proposed Additional Data Collection Points*, revised 4/27/17 by EnviroForensics

Copy:

- JP Hammerton, Albany International, jp.hammerton@albint.com
- Joseph Gaug, Albany International, joseph.gaug@albint.com
- Rob Biersteker, Luvata Appleton, LLC, rob.biersteker@luvata.com
- Sam Edwards, Luvata Appleton, LLC, sam.edwards@luvata.com
- Mike Boozer, ChemReport, mboozer@chemreport.com
- Benton Stelzel, DNR Environmental Enforcement, benton.stelzel@wisconsin.gov
- Roxanne Chronert, DNR Remediation & Redevelopment, roxanne.chronert@wisconsin.gov



Legend

- Property boundary
- GAS Underground gas utility line
- WTR Underground water utility line
- SAN Underground sanitary utility line
- UGT Fiber optics line
- STM Underground storm utility line
- Pipe chase
- French drain and associated piping
- Sump
- Former Sump
- B-1 Soil boring (STS)
- GP-1 Soil boring (Badger)
- GMW01 Abandoned Temp well (McMahon)
- C-1 Shallow soil floor sample (STS)
- C-3 Shallow soil wall sample (STS)
- MW-1 Monitoring well (STS)
- MW-18 Monitoring well (McMahon)
- MW-19 Monitoring well (Badger)
- MW-10 Monitoring well abandoned (MW-10 in 1998) and (MW-11 in 1991)
- UB-1 Proposed utility soil boring
- GP-14 Proposed geoprobe soil boring
- MW-19 Proposed water table observation well (with 10 foot screen length)
- MW-19A Proposed piezometer (with 5 foot screen length set within the 30-40' depth interval)
- MW-1B Proposed piezometer (with 5 foot screen length set within the 40-50' depth interval)
- MW-19C Proposed piezometer (with 5 foot screen length set within the 50-60' depth interval)

SITE PLAN WITH PROPOSED ADDITIONAL DATA COLLECTION POINTS
 Albany International - Luvata Site
 908 North Lawe Street
 Appleton, Wisconsin

| | |
|-----------|---------------------------|
| Date: | 1/11/17 (Revised 4/27/17) |
| Designed: | EB |
| Drawn: | EB |
| Checked: | WF |
| DWG file: | 6486-0092 |



| | |
|---------|------|
| Figure | 9 |
| Project | 6486 |

