



April 24, 2019

Ms. Jennifer Borski
Wisconsin Department of Natural Resources
625 E. County Rd Y, Suite 700
Oshkosh, WI 54901

**Re: Public Participation Plan
Appleton Wire (Former)
908 N. Lawe Street
Appleton, Wisconsin
BRRTS# 02-45-000015**

Dear Ms. Borski:

EnviroForensics, LLC (EnviroForensics) is pleased to submit this Public Participation Plan (Plan) related to the proposed remedial actions at the former Appleton Wire site located at 908 N. Lawe Street in Appleton, Wisconsin. The Plan has been prepared in accordance with the requirements of Wisconsin Administrative Code (WAC) Chapter NR 714, and includes a brochure that will be given to nearby property owners, residents, and institutions for work notification purposes. One hardcopy of the Plan is enclosed, and an electronic copy has been uploaded to the RR Program Submittal Portal.

Sincerely,
EnviroForensics, LLC

A handwritten signature in cursive script, reading "Wayne P. Fassbender".

Wayne Fassbender, PG
Senior Project Manager

enclosures



Albany Wire (Former)
908 N. Lawe Street, Appleton, WI
BRRTS#02-45-000015

PUBLIC PARTICIPATION PLAN

This public participation plan has been developed by EnviroForensics in accordance with Wisconsin Administrative Code (WAC) Chapter NR 714 to serve as a framework for community relations efforts associated with disseminating information regarding the remediation of hexavalent chromium at the Luvata warehouse (former Appleton Wire) located off Meade Street in Appleton, Wisconsin.

The planned remedial activities generally involve subsurface injections of reducing compounds to induce sequestering of the hexavalent chromium inside the warehouse and limited subsurface injections in areas outside and adjacent to the north and south walls of the warehouse. These injections will be performed below the water table from 6-20 feet using a small drill rig and supporting equipment.

In addition, there will be pavement removal and soil blending activities performed inside the warehouse and an outside portion of the parking lot adjacent to, and north of, the warehouse. The blending activities will take place within the upper 6-feet of unsaturated soil. The remedial material blended will be zero-valent iron (ZVI) in powdered form to again reduce and sequester the hexavalent chromium.

The potential health risks include inhalation and ingestion of dust and dirt containing hexavalent chromium. ZVI dust is considered an irritant if inhaled at sufficient quantities. These health risks can be easily mitigated by working the soil and ZVI under wet conditions, isolating and containing the operations, and securing the site to prevent public access. Sawing of concrete has the greatest potential for production of dust containing hexavalent chromium but this process will also be performed under wet conditions and will be contained within the warehouse, isolating it from the public to eliminate the threat of exposure.

For the most part, the majority of remedial activities will be performed inside of the warehouse and out of public view. However, movement of materials on and off site, along with the aforementioned remedial activities in outside areas will be visible to the public. Therefore, questions may arise.

EnviroForensics will implement the recommendations in this plan as appropriate to ensure that residents and businesses located near the facility, and local authorities, are informed of planned remedial activities in their area, and that appropriate measures are being taken to eliminate health risks.



PUBLIC NOTIFICATION PROCEDURES

Activity 1: Prepare and Distribute Informational Brochure

Objective: To inform all nearby property owners and institutions of the planned remedial activities and provide options for obtaining further information.

Method: Current residents, businesses, and community institutions within a two-block radius of the warehouse will receive an informational brochure from EnviroForensics. The brochure will be in the form of a single, double-sided sheet. The brochures will be hand delivered and an attempt will be made to discuss the project with the residents or business at the time of delivery. If no one can be reached at that time, the brochure will be attached to entry doors or placed near the mailbox. The brochure provides information about the upcoming remedial activities and contact information for obtaining further information. Contact information has been provided for the EnviroForensics project manager and the WDNR project manager. A copy of the informational brochure is attached.

Timeline: Informational Brochures will be distributed in early May of 2019.

Activity 2: Government Institution Notification

Objective: To inform local authorities of remedial activities so that they can better understand the nature of the project and their roles, and to establish a communication protocol regarding questions posed by the public.

Method: EnviroForensics will provide notification to the government units listed below in person and provide them with copies of the informational brochure:

City of Appleton Public Works Administration

100 N. Appleton Street
Appleton, WI
920-832-6489

City of Appleton Health Department

100 N. Appleton Street
Appleton, Wisconsin
920-832-6429



City of Appleton Fire Department
700 N. Drew Street
Appleton, WI
920-832-5810

City of Appleton Police Department
222 S. Walnut Street
Appleton, WI
920-832-5500: Non-emergency

Timeline: Notification will be provided in early May, 2019.

ADDRESSING PROJECT QUESTIONS

Objective: To inform local authorities and project team members of desired actions and responses to inquiries from local residents, businesses, and news agencies.

Method:

Local government units will be requested to direct any inquiries regarding project specifics to:
Wayne Fassbender, PG at 414-982-3988.

If approached with questions during the active workday (while on break or when not in a work zone restricted area), EnviroForensics staff and subcontractors will respond politely with “We are performing some site restoration work”, hand them a brochure, and have them contact Wayne Fassbender with additional questions.

FORMER APPLETON WIRE SITE REMEDIATION

CHROMIUM
STABILIZATION

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JULY-NOVEMBER
2019



Neighbor Notification

We are notifying our nearby neighbors that there will be some increased activities at the current LUVATA warehouse facility during the summer and fall months. The warehouse is located adjacent to Meade Street. The activities are mainly limited to areas inside the warehouse, and small areas within the south and north parking lots adjacent to the warehouse. These activities include drilling in the south parking area and within the warehouse, and shallow soil mixing within the warehouse and north parking area.

What You May See

- Temporary warehousing in the LUVATA west parking lot
- Drilling for a day or so in a small area of the adjacent parking lot south of the warehouse
- Fencing within the north parking area for security and to restrict access
- Movement of materials in and out of the warehouse from the north parking area
- Trucking of concrete, asphalt, and some soil
- Excavating in the north parking area



FORMER APPLETON WIRE SITE REMEDIATION

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Why Is This Occurring?

The former Appleton Wire manufacturing company performed chrome plating operations within the building addition (now used as a warehouse by LUVATA) during the 1960's up until 1980. The plating solution, which contains hexavalent chromium, was released into the ground over time, and now remedial actions are needed to convert the hexavalent chromium to other forms of chromium which are not considered toxic.

For More Information Contact:

Wayne Fassbender, P.G.
Project Manager
wfassbender@enviroforensics.com
(414) 982-3988

Jennifer Borski, Hydrogeologist
WI Dept. of Natural Resources
(920) 424-7887

Will Any of This Affect Your Health?

The short answer is **NO!** Soil in the area and beneath the facility is clay. The clay has impeded the migration of the chromium and the extent of chromium in soil and groundwater is limited to the facility property, specifically those areas where remediation will occur. The remedial efforts will convert the hexavalent chromium to non-toxic trivalent chromium which will then form immobile precipitates to further limit migration within the soil and groundwater. Groundwater impacts are not a health concern since shallow groundwater is not useable for drinking water and your water comes from municipal sources.

Negative health effects from the hexavalent chromium, if any, would occur only if dust containing the chromium is inhaled, ingested, or is in direct contact with the skin. To eliminate dust during remedial activities, we will be isolating the concrete removal and main soil blending activities by containing the vast majority of these operations within the warehouse. In addition, all concrete sawing and soil blending operations will be performed under wet conditions, with water added when needed to eliminate dust production.