



November 30, 2022

Albany International Corp.  
ATTN: Joe Gaug  
P.O. Box 1907  
Albany, NY 12201  
*Via Electronic Mail Only to [Joseph.Gaug@albint.com](mailto:Joseph.Gaug@albint.com)*

Luvata Appleton LLC  
ATTN: Sam Edwards  
553 Carter Court  
Kimberly, WI 54136  
*Via Electronic Mail Only to [Sam.Edwards@luvata.com](mailto:Sam.Edwards@luvata.com)*

**KEEP THIS LEGAL DOCUMENT WITH YOUR PROPERTY RECORDS**

SUBJECT: Case Closure with Continuing Obligations  
Appleton Wire (Former), 908 N. Lawe Street, Appleton, WI 54911  
BRRTS #: 02-45-000015, FID #: 445035910

Dear Mr. Gaug & Mr. Edwards:

The Wisconsin Department of Natural Resources (DNR) is pleased to inform you that the Appleton Wire (Former) case identified above met the requirements of Wisconsin Administrative (Wis. Admin.) Code chs. NR 700 to 799 for case closure with continuing obligations (COs). COs are legal requirements to address potential exposure to remaining contamination. No further investigation or remediation is required at this time for the reported hazardous substance discharge and/or environmental pollution.

However, you, future property owners and occupants of the property must comply with the COs as explained in this letter, which may include maintaining certain features and notifying the DNR and obtaining approval before taking specific actions. You must provide this letter and all enclosures to anyone who purchases, rents or leases this property from you. Some COs also apply to other properties or rights of way (ROWs) affected by the contamination as identified in the Continuing Obligation Summary section of this letter.

This case closure decision is issued under Wis. Admin. Code chs. NR 700 to 799 and is based on information received by the DNR to date. The DNR reviewed the case closure request for compliance with state laws and standards and determined the case closure request met the notification requirements of Wis. Admin. Code ch. NR 725, the response action goals of Wis. Admin. Code § NR 726.05(4), and the case closure criteria of Wis. Admin. Code §§ NR 726.05, 726.09 and 726.11, and Wis. Admin. Code ch. NR 140.

The Appleton Wire (Former) site was investigated for a discharge of hazardous substances and/or environmental pollution from former chrome plating operations located in the eastern portion of the building (now a warehouse). The warehouse is currently owned by Luvata Appleton LLC (Luvata). Chromium contamination in soil and groundwater is generally limited to the Luvata property with some impacts extending onto the property to the

Mr. Joe Gaug, Albany International Corp and Mr. Sam Edwards, Luvata Appleton LLC  
Case Closure with Continuing Obligations  
Appleton Wire (Former) – BRRTS # 02-45-000015

south, 714 E. Hancock Street, and within the Meade Street right-of-way. Case closure is granted for the metals and chlorinated volatile organic compounds (CVOCs) as documented in the case file. The site investigation and/or remedial action addressed soil, groundwater, and vapor. The remedial action consisted of a groundwater recovery and treatment system, injection of organics and zero-valent iron (ZVI) below the water table, and in-situ blending of unsaturated soils with ZVI. Contamination remains in soil and groundwater on the Luvata property with some impacts extending onto the property to the south, 714 E. Hancock Street, and within the Meade Street right-of-way.

The case closure decision and COs required are based on the current use of the source property at 908 N. Lawe Street for industrial purposes, and the affected properties (listed in the table below), 714 E. Hancock Street, for industrial purposes and Meade Street as road right-of-way. The source property is currently zoned General Industrial District, and the affected properties are currently zoned General Industrial District and designated road right-of-way. Based on the land use and zoning, the site, including both the source property and the affected property, 714 E. Hancock Street, meet the industrial land use classification under Wis. Admin. Code § NR 720.05(5) for application of residual contaminant levels in soil.

### SUMMARY OF CONTINUING OBLIGATIONS

COs are applied at the following locations:

ADDRESS (Appleton, WI)	COS APPLIED	DATE OF MAINTENANCE PLAN(S)
908 N. Lawe Street (Source Property)	<ul style="list-style-type: none"> <li>• Residual Soil Contamination</li> <li>• Cover for Soil (Maintenance Required)</li> <li>• Residual Groundwater Contamination</li> <li>• Vapor Intrusion (VI) – Future Concern</li> </ul>	May 2, 2022
714 E. Hancock Street	<ul style="list-style-type: none"> <li>• Residual Soil Contamination</li> <li>• Cover for Soil (Maintenance Required)</li> <li>• Residual Groundwater Contamination</li> </ul>	May 2, 2022
Meade Street right-of-way	<ul style="list-style-type: none"> <li>• Residual Soil Contamination</li> <li>• Residual Groundwater Contamination</li> </ul>	Not Applicable

Mr. Joe Gaug, Albany International Corp and Mr. Sam Edwards, Luvata Appleton LLC  
Case Closure with Continuing Obligations  
Appleton Wire (Former) – BRRTS # 02-45-000015

## CLOSURE CONDITIONS

Closure conditions are legally required conditions which include both COs and other requirements for case closure (Wis. Stat. § 292.12(2)). Under Wis. Stat. § 292.12(5), you, any subsequent property owners and occupants of the property must comply with the closure conditions as explained in this letter. The property owner must notify occupants for any condition specified in this letter under Wis. Admin. Code §§ NR 726.15(1)(b) and NR 727.05(2). If an occupant is responsible for maintenance of any closure condition specified in this letter, you and any subsequent property owner must include the condition in the lease agreement under Wis. Admin. Code § NR 727.05(3) and provide the maintenance plan to any occupant that is responsible.

DNR staff may conduct periodic pre-arranged inspections to ensure that the conditions included in this letter and the maintenance plan dated May 2, 2022, are met (Wis. Stat. § 292.11(8)). If these requirements are not followed, the DNR may take enforcement action under Wis. Stat. ch. 292 to ensure compliance with the closure conditions.

## SOIL

### *Continuing Obligations to Address Soil Contamination*

Residual Soil Contamination (Wis. Admin. Code chs. NR 718, NR 500 to 599, and § NR 726.15(2)(b) and Wis. Stat. ch. 289)

Soil contamination remains on the Luvata property with some impacts extending onto the property to the south, 714 E. Hancock Street, and within the Meade Street right-of-way, as indicated on the enclosed maps (Figure B.2.b.1, Residual Soil Contamination - CVOCs, April 13, 2022 & Figure B.2.b.2, Residual Soil Contamination – Hexavalent Chromium, April 5, 2019). If soil in the location(s) shown on the map is excavated in the future, the property owner or right of way holder at the time of excavation must sample and analyze the excavated soil. If sampling confirms that contamination is present, the property owner or right of way holder at the time of excavation will need to determine if the material is considered solid waste and ensure that any storage, treatment, or disposal complies with applicable standards and rules. Contaminated soil may be managed under Wis. Admin. Code ch. NR 718 with prior DNR approval.

In addition, all current and future property owners, occupants and right of way holders need to be aware that excavation of the contaminated soil may pose an inhalation and direct contact hazard; special precautions may be needed to prevent a threat to human health.

Cover (for soil) (Wis. Stat. § 292.12(2)(a), Wis. Admin. Code §§ NR 724.13(1) and (2), NR 726.15(2)(d) and/or (e), NR 727.07(1))

The concrete floor of the warehouse, asphalt surface, part of a shipping and receiving building between the north warehouse and north property boundary, and asphalt, concrete, and green space between the south warehouse and south property boundary, as shown on the enclosed map (Figure D.2-2, Cap Extent and Components, March 22, 2022) shall be maintained in compliance with the enclosed maintenance plan, dated May 2, 2022. The purpose of the cover is to minimize the infiltration of water through contaminated soil and prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

The cover approved for this closure was designed to be protective for commercial or industrial land uses. Before using the property for residential purposes and before taking an action, the property owner must notify the DNR to determine if additional response actions are warranted. A cover intended for industrial land uses or certain types of commercial land uses may not be protective if the property changes to a residential use. This may include, but is not limited to, single or multiple family residences, a school, day care, senior center, hospital, or

Mr. Joe Gaug, Albany International Corp and Mr. Sam Edwards, Luvata Appleton LLC  
Case Closure with Continuing Obligations  
Appleton Wire (Former) – BRRTS # 02-45-000015

similar settings. In addition, a cover designed for multi-family residential housing use may not be appropriate for use at a single-family residence.

To modify or replace a cover, the property owner must submit a request to the DNR under Wis. Admin. Code ch. NR 727. The DNR approval must be obtained before implementation. The replacement or modified cover must be a structure of similar permeability or be protective of the revised use of the property until contaminant levels no longer exceed Wis. Admin. Code ch. NR 720 groundwater pathway residual contaminant levels and/or direct contact residual contaminant levels (RCLs).

## GROUNDWATER

### *Continuing Obligations to Address Groundwater Contamination and/or Monitoring Wells*

Residual Groundwater Contamination (Wis. Admin. Code ch. NR 140 and § NR 812.09(4)(w))

Groundwater contamination which equals or exceeds the enforcement standards for metals and CVOCs are present on the Luvata property with metals impacts extending onto the property to the south, 714 E. Hancock Street, and within the Meade Street right-of-way as shown on the enclosed maps (Figure B.3.b.1, Groundwater Isoconcentration – CVOCs, August 6, 2018 & Figure B.3.b.2, Groundwater Isoconcentration – Metals, April 14, 2022). To construct a new well or reconstruct an existing well, the property owner must obtain prior DNR approval. Additional casing may be necessary to prevent contamination of the well.

### *Other Groundwater or Monitoring Well Related Closure Information*

Transfer of Responsibility for Filling and Sealing Monitoring Wells (Wis. Admin. Code § NR 726.15(2)(c)3.)

The responsibility for monitoring wells TW-1, TW-2, TW-3, TW-4, TW-5, TW-6, MW-1, MW-1B, MW-2, MW-2A, MW-5, MW-5A, MW-10R, MW-10B, MW-17, MW-17A, MW-18, MW-18A, MW-19R, MW-19AR, MW-20R, MW-20AR, MW-21, MW-21A, MW-22, MW-22A, MW-23, MW-23A, MW-24, MW-24A, MW-25, MW-25A, MW-26R, MW-28R, MW-30R, MW-31, MW-31A, and MW-32 are being transferred to another site undergoing environmental cleanup, Appleton Wire (Former) – Site 2, BRRTS # 02-45-587658, for continued monitoring. Do not fill and seal these wells at this time. Well filling and sealing will be required of the Appleton Wire (Former) – Site 2 site for closure, upon conclusion of the cleanup of that site. These wells are identified on the enclosed map, Figure B.3.d, Monitoring Well Network, April 14, 2022.

## VAPOR

### *Continuing Obligations to Address Vapor Contamination*

Vapor intrusion (VI) is the movement of vapors coming from volatile chemicals in the soil or groundwater or within preferential pathways into buildings where people may breathe air contaminated by the vapors.

VI - Future Concern: (Wis. Stat. § 292.12(2), Wis. Admin. Code § NR 726.15(2)(L) or (m), as applicable.

CVOCs remain in soil and groundwater beneath the warehouse on the eastern portion of the property, as shown on the enclosed maps (Figure B.2.b.1, Residual Soil Contamination - CVOCs, April 13, 2022 & Figure B.3.b.1, Groundwater Isoconcentration – CVOCs, August 6, 2018) at concentrations that may be of concern for vapor intrusion in the future, if a building is constructed, renovated, or expanded in an area where no building currently exists or if an existing building is remodeled. Currently the property consists of one (1) single-story slab-on-grade manufacturing building measuring approximately 42,500 square feet and one (1) attached warehouse measuring approximately 10,500 square feet.

Mr. Joe Gaug, Albany International Corp and Mr. Sam Edwards, Luvata Appleton LLC  
Case Closure with Continuing Obligations  
Appleton Wire (Former) – BRRTS # 02-45-000015

Vapor control technologies are required for new construction or for modification of occupied buildings on the property unless the property owner assesses the vapor pathway and the DNR agrees that vapor control technologies are not needed. The property owner shall maintain the current building use and layout.

See the Other Closure Requirements section for more details.

## **OTHER CLOSURE REQUIREMENTS**

Maintenance Plan and Inspection Log (Wis. Admin. Code §§ NR 726.11(2), NR 726.15(1)(d), NR 727.05(1)(b)3., Wis. Admin. Code § NR 716.14(2) for monitoring wells)

The property owner is required to comply with the enclosed maintenance plan dated May 2, 2022, for the cover to conduct inspections annually and to use the inspection log (DNR Form 4400-305) to document the required inspections. The maintenance plan and inspection log are to be kept up-to-date and on-site. The property owner shall submit the inspection log to the DNR only upon request using the RR Program Submittal Portal. See the DNR Notification and Approval Requirements section below for more information on how to access the Submittal Portal.

The limitations on activities are identified in the enclosed maintenance plan. The following activities are prohibited on any portion of this property where the cover is required, without prior DNR approval.

- removal of the existing barrier or cover;
- replacement with another barrier or cover;
- excavating or grading of the land surface;
- filling on covered or paved areas;
- plowing for agricultural cultivation;
- construction or placement of a building or other structure; and
- changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

Pre-Approval Required for Well Construction (Wis. Admin. Code § NR 812.09(4)(w))

DNR approval is required before well construction or reconstruction for all sites identified as having residual contamination and/or COs. This requirement applies to private drinking water wells and high-capacity wells. To obtain approval, the property owner is required to complete and submit Form 3300-254, Continuing Obligations/Residual Contamination Well Approval Application, to the DNR Drinking and Groundwater program's regional water supply specialist. A well driller can help complete this form. The form can be obtained online at [dnr.wi.gov](http://dnr.wi.gov), search "3300-254." Additional casing may be necessary to help prevent contamination of the well.

General Wastewater Permits for Construction-related Dewatering Activities (Wis. Admin. Code ch. NR 200)

The DNR's Water Quality Program regulates point source discharges of contaminated water, including discharges to surface waters, storm sewers, pits, or to the ground surface. This includes discharges from construction-related dewatering activities, including utility work and building construction.

If the property owner or any other person plans to conduct such activities, that person must contact the Water Quality Program and, if necessary, apply for the required discharge permit. If residual soil or groundwater contamination is likely to affect water collected in a pit/trench that requires dewatering, a general permit for discharge of *Contaminated Groundwater from Remedial Action Operations* may be needed. If water collecting in a pit/trench that requires dewatering is expected to be free of pollutants other than suspended solids, oil and

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Case Closure with Continuing Obligations  
Appleton Wire (Former) – BRRTS # 02-45-000015

grease, a general permit for pit/trench *Dewatering Operations* may be needed. Additional information can be obtained by visiting the DNR website at “dnr.wi.gov,” search “wastewater general permits.”

### **DNR NOTIFICATION AND APPROVAL REQUIREMENTS**

Certain activities are limited at closed sites to maintain protectiveness to human health and the environment. The property owner is required to notify the DNR at least 45 days before and obtain approval from the DNR prior to taking the following actions (Wis. Admin. Code §§ NR 727.07, NR 726.15 (2), Wis. Stat. § 292.12(6)).

- Before removing a cover or any portion of a cover;
- Before constructing a building and/or modifying use of or the construction of an existing building or changing property use. Certain activities are limited at closed sites to reduce the risk of exposure to residual contamination via vapor intrusion. For properties with a continuing obligation for addressing the future risk of vapor intrusion when buildings exist at the time of closure approval, changes to the current building use and layout are prohibited without prior DNR approval. This includes any change in building construction, reconstruction, or partial demolition. The DNR may require additional actions at that time to re-assess for vapor intrusion and mitigate, as appropriate.

The DNR may require additional investigation and/or cleanup actions if necessary, to be protective of human health and the environment. The case may be reopened under Wis. Admin. Code § NR 727.13 if additional information indicates that contamination on or from the site poses a threat, or for a lack of compliance with a CO or closure requirement. Compliance with the maintenance plan is considered when evaluating the reopening criteria.

### **SUBMITTALS AND CONTACT INFORMATION**

Site, case-related information and DNR contacts can be found online in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW); go to [dnr.wi.gov](http://dnr.wi.gov) and search “BOTW.” Use the BRRTS ID # found at the top of this letter. The site can also be found on the map view, Remediation and Redevelopment Sites Map (RRSM) by searching “RRSM.”

Send written notifications and inspection logs to the DNR using the RR Program Submittal Portal at [dnr.wi.gov](http://dnr.wi.gov), search “RR submittal portal” (<https://dnr.wi.gov/topic/Brownfields/Submittal.html>). Questions on using this portal can be directed to David Neste below or to the environmental program associate (EPA) for the regional DNR office. Visit [dnr.wi.gov](http://dnr.wi.gov), search “RR contacts” and select the EPA tab (<https://dnr.wi.gov/topic/Brownfields/Contact.html>).

### **CLOSING**

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact DNR project manager David Neste at (920) 362-2072 or [David.Neste@wisconsin.gov](mailto:David.Neste@wisconsin.gov).

Sincerely,



Roxanne N. Chronert  
Team Supervisor, Northeast Region  
Remediation & Redevelopment Program

November 30, 2022

Page 7 of 7

Mr. Joe Gaug, Albany International Corp and Mr. Sam Edwards, Luvata Appleton LLC  
Case Closure with Continuing Obligations  
Appleton Wire (Former) – BRRTS # 02-45-000015

Attachments:

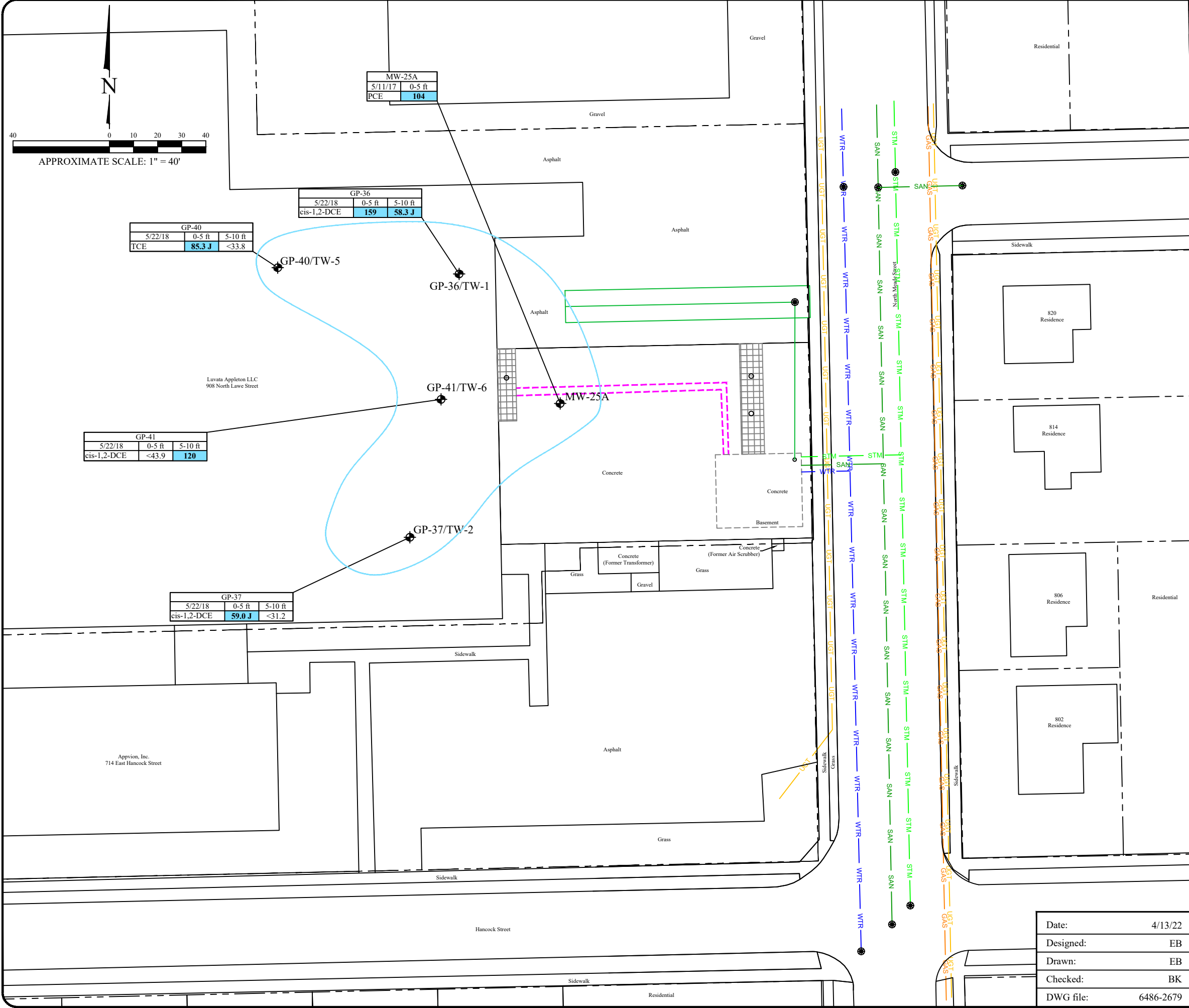
- Figure B.2.b.1, Residual Soil Contamination - CVOCs, April 13, 2022
- Figure B.2.b.2, Residual Soil Contamination – Hexavalent Chromium, April 5, 2019
- Figure B.3.b.1, Groundwater Isoconcentration – CVOCs, August 6, 2018
- Figure B.3.b.2, Groundwater Isoconcentration – Metals, April 14, 2022
- Figure B.3.d., Monitoring Well Network, April 14, 2022
- Attachment D, Cap Maintenance Plan, May 2, 2022

cc: Rob Hoverman, EnviroForensics LLC ([rhoverman@enviroforensics.com](mailto:rhoverman@enviroforensics.com))  
Brian Kappen, EnviroForensics LLC ([bkappen@enviroforensics.com](mailto:bkappen@enviroforensics.com))

Additional Resources:

The DNR fact sheets listed below can be obtained by visiting the DNR website at “[dnr.wi.gov](http://dnr.wi.gov),” search the DNR publication number.

- *Guidance for Electronic Submittals for the Remediation and Redevelopment Program* (RR-690)
- *Continuing Obligations for Environmental Protection* (RR-819)
- *Environmental Contamination and Your Real Estate* (RR-973)
- *Post-Closure Modifications: Changes to Property Conditions after a State-Approved Cleanup* (RR-987)
- *Using Natural Attenuation to Clean Up Contaminated Groundwater: What Landowners Should Know* (RR-671)



### 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
- Floor drain
- Manhole
- MW-4 - Monitoring well
- GP-36/TW-1 - Soil boring/1-inch diameter well
- Dairy tile floor

Analyte	Soil to Groundwater Residual Contaminant Level	Non-Industrial Direct Contact RCL	Industrial Direct Contact RCL
PCE	<b>4.5</b>	<b>33,000</b>	<b>145,000</b>
TCE	<b>3.6</b>	<b>1,300</b>	<b>8,410</b>
cis-1,2-DCE	<b>41.2</b>	<b>156,000</b>	<b>2,340,000</b>

- Note:
- Bold shaded blue values exceed WDNR Soil to Groundwater Residual Contaminant Level
  - Results are reported in micrograms per kilogram ( $\mu\text{g}/\text{kg}$ )
  - PCE = Tetrachloroethene
  - TCE = Trichloroethene
  - cis-1,2-DCE = cis-1,2-Dichloroethene
  - CVOCs = Chlorinated Volatile Organic Compounds
  - RCL = Residual Contaminant Level
  - ND = Not detected above laboratory detection limits

Extent of CVOC concentrations in soil exceeding a Soil to Groundwater Residual Contaminant Level

## RESIDUAL SOIL CONTAMINATION - CVOCs

Former Appleton Wire  
908 North Lawe Street  
Appleton, Wisconsin

Date:	4/13/22
Designed:	EB
Drawn:	EB
Checked:	BK
DWG file:	6486-2679

825 North Capitol Avenue • Indianapolis, IN 46204  
EnviroForensics.com

Figure	B.2.b.1
Project	6486

GP-40		
5/22/18	0-5 ft	5-10 ft
TCE	<b>85.3 J</b>	<33.8

GP-36		
5/22/18	0-5 ft	5-10 ft
cis-1,2-DCE	<b>159</b>	<b>58.3 J</b>

GP-41		
5/22/18	0-5 ft	5-10 ft
cis-1,2-DCE	<43.9	<b>120</b>

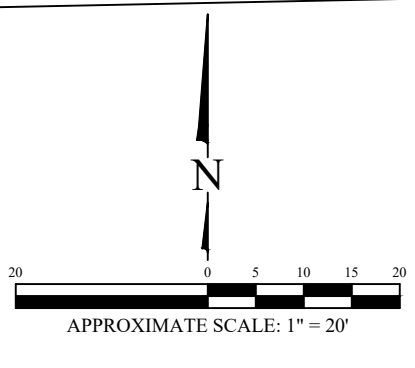
GP-37		
5/22/18	0-5 ft	5-10 ft
cis-1,2-DCE	<b>59.0 J</b>	<31.2

MW-25A	
5/11/17	0-5 ft
PCE	<b>104</b>

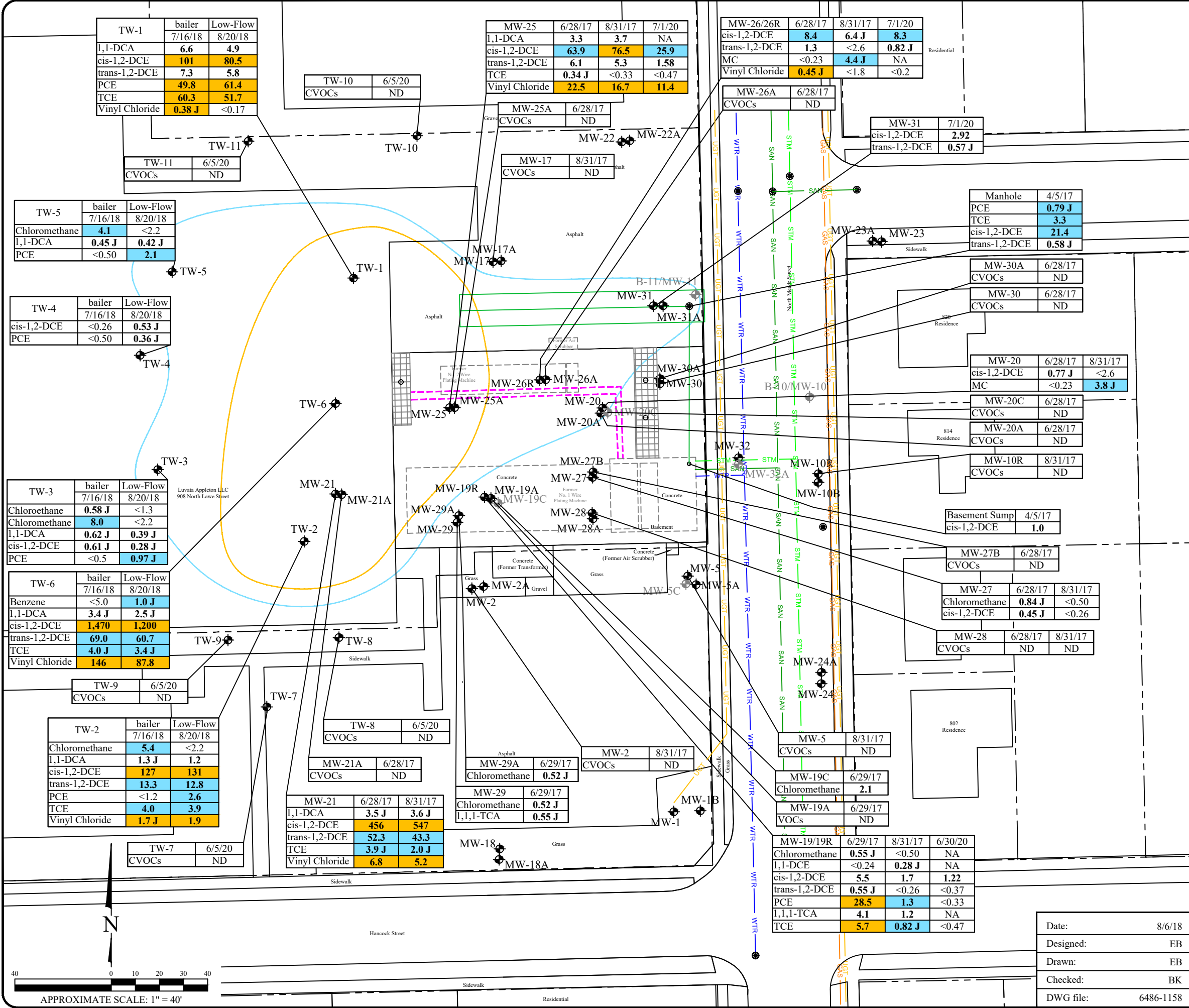


**Legend**

- Property boundary
- GAS --- Underground gas utility line
- WTR --- Underground water utility line
- SAN --- Underground sanitary utility line
- FO --- Fiber optics line
- STM --- Underground storm utility line
- Pipe chase
- French drain and associated piping
- Sump
- Former Sump
- Floor drain
- B-1 Soil boring (STS)
- GP-1 Soil boring (Badger)
- 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)
- MW-4 Monitoring well
- GP-36/TW-1 Soil boring/1-inch diameter well
- RS-1 Soil borings in un-blended areas
- BSS-1 Post-remedial location of soil samples with analytical results
- Hexavalent chromium concentrations exceeding Non-Industrial Direct Contact RCL (pertains to upper four feet of unsaturated soil)
- Hexavalent chromium concentrations in soil exceeding the soil to groundwater RCL
- Hexavalent chromium concentrations exceeding the Industrial Direct Contact RCL (pertains to upper 4 feet of unsaturated soil)
- Soil blending zones A, B, and C



No.	1	Date	7/3/18	Revision	Updates	Approved	WF
825 North Capital Avenue • Indianapolis, IN 46204 EnviroForensics.com							
Date:		4/5/19		Designed:		EB	
Drawn:		EB		Checked:		BK	
DWG file:		6486-2681					
RESIDUAL SOIL CONTAMINATION - HEXAVALENT CHROMIUM				Figure			
B.2.b.2				Project			
Former Appleton Wire				6486			
908 North Lawe Street							
Appleton, Wisconsin							



### Legend

- Property boundary
- GAS
- WTR
- SAN
- UGT
- STM
- Pipe chase
- French drain and associated piping
- Sump
- Floor drain
- Manhole
- Monitoring well
- Abandoned monitoring well
- Dairy tile floor

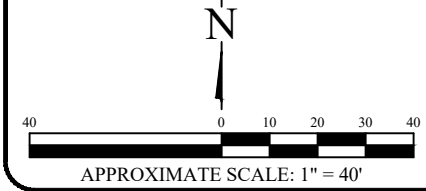
Analyte	Public Health Preventive Action Limit	Public Health Enforcement Standard
Chloromethane	<b>3</b>	<b>30</b>
1,1-DCA	<b>85</b>	<b>850</b>
cis-1,2-DCE	<b>7</b>	<b>70</b>
trans-1,2-DCE	<b>10</b>	<b>100</b>
PCE	<b>0.5</b>	<b>5</b>
1,1,1-TCA	<b>20</b>	<b>200</b>
TCE	<b>0.5</b>	<b>5</b>
Vinyl Chloride	<b>0.02</b>	<b>0.2</b>
MC	<b>0.5</b>	<b>5</b>

- Note:
- Bolded and orange shaded values exceed the Public Health Enforcement Standard
  - Bolded and blue shaded values exceed the Public Health Preventive Action Limit
  - Bolded values are above detection limits
  - J = Analyte concentration less than laboratory detection limits
  - Samples analyzed using EPA SW-846 Method 8260
  - All results reported in units of micrograms per liter (µg/L)
  - PCE = Tetrachloroethene
  - TCE = Trichloroethene
  - 1,1-DCA = 1,1-Dichloroethane
  - cis-1,2-DCE = cis-1,2-Dichloroethene
  - trans-1,2-DCE = trans-1,2-Dichloroethene
  - 1,1,1-TCA = 1,1,1-Trichloroethane
  - MC = Methylene Chloride
  - CVOCs = Chlorinated Volatile Organic Compounds
  - ND = Not detected above laboratory detection limits
  - NA = Not analyzed

- MW-19 Water table observation well (with 10 foot screen length)
- MW-19A Piezometer (with 5 foot screen length set within the 30-40' depth interval)
- MW-1B Piezometer (with 5 foot screen length set within the 40-50' depth interval)
- Extent of CVOCs exceeding groundwater preventive action limits
- Extent of CVOCs exceeding groundwater enforcement standards

**GROUNDWATER ISOCONCENTRATION - CVOCs**

Former Appleton Wire  
908 North Lawe Street  
Appleton, Wisconsin



Date:	8/6/18
Designed:	EB
Drawn:	EB
Checked:	BK
DWG file:	6486-1158



Figure	B.3.b.1
Project	6486

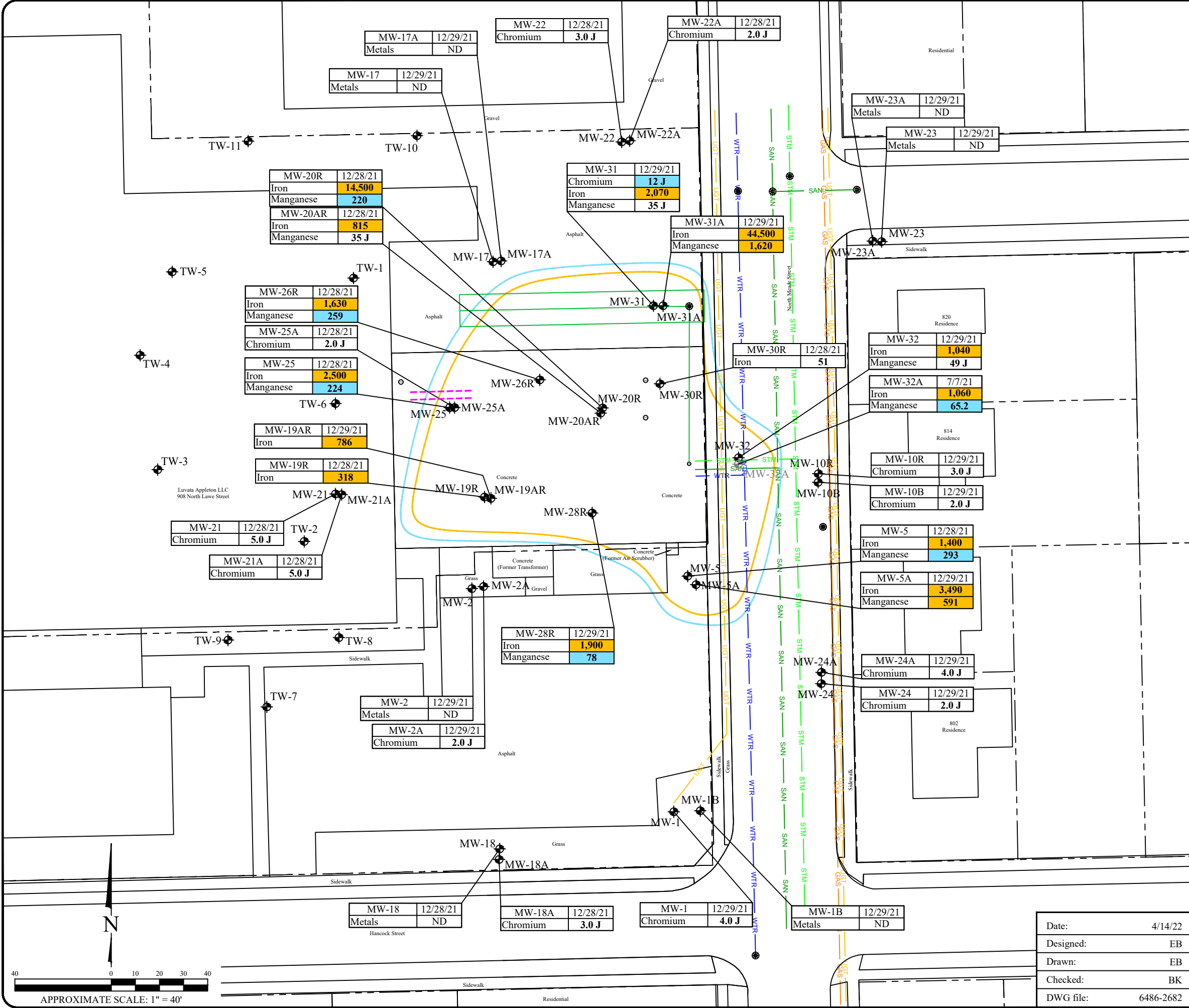
### Legend

- 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
- Floor drain
- Manhole
- MW-1 Monitoring well
- MW-32A Abandoned monitoring well

Analyte	Public Health Preventive Action Limit	Public Health Enforcement Standard
Chromium	10	100
Iron	150*	300*
Manganese	60	300

- Note:
- Bolded and orange shaded values exceed the Public Health Enforcement Standard
  - Bolded and blue shaded values exceed the Public Health Preventive Action Limit
  - Bolded values are above detection limits
  - J = Estimated concentration between the laboratory method detection limit and reporting limit
  - Samples analyzed using EPA SW-846 Method 8260
  - All results reported in units of micrograms per liter (µg/L)
  - ND = Not detected above laboratory detection limits
  - NA = Not analyzed
  - \* = Public Welfare Standard

- MW-19 Water table observation well (with 10 foot screen length)
- MW-19A Piezometer (with 5 foot screen length set within the 30-40' depth interval)
- MW-1B Piezometer (with 5 foot screen length set within the 40-50' depth interval)
- Extent of Post-Remedial Metals Contamination in Groundwater Exceeding a PAL or ES
- Extent of Post-Remedial Metals Contamination in Groundwater Exceeding an ES



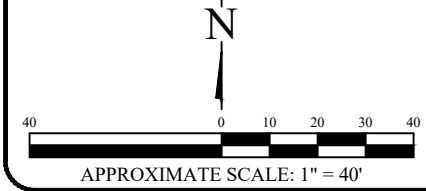
### GROUNDWATER ISOCONCENTRATION - METALS

Former Appleton Wire  
908 North Lawe Street  
Appleton, Wisconsin













Date:	4/14/22
Designed:	EB
Drawn:	EB
Checked:	BK
DWG file:	6486-2682



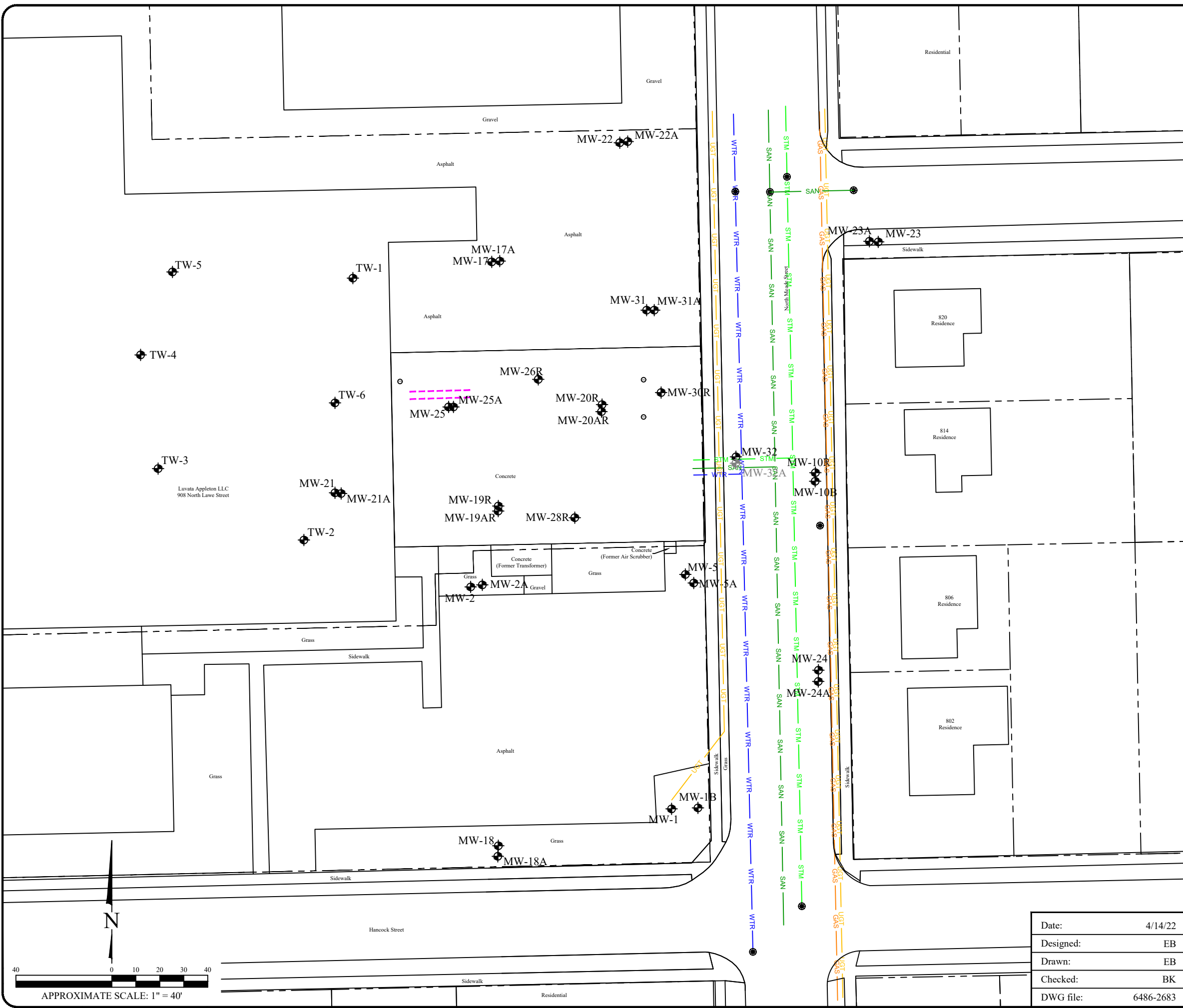
Figure	B.3.b.2
Project	6486



### 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
-  Floor drain
-  Manhole
-  TW-1 1-inch diameter groundwater monitoring well
-  MW-1 2-inch diameter groundwater monitoring well
-  MW-32A Abandoned monitoring well

Note:  
 1. All monitoring wells will be retained for potential future sampling for BRRTS #02-45-587658.



### MONITORING WELL NETWORK

Former Appleton Wire  
 908 North Lawe Street  
 Appleton, Wisconsin

Date:	4/14/22
Designed:	EB
Drawn:	EB
Checked:	BK
DWG file:	6486-2683



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Figure	B.3.d
Project	6486



## D.1 CAP MAINTENANCE PLAN

May 2, 2022

Property identified as:

**Luvata Appleton LLC  
908 N. Lawe Street  
Appleton, Wisconsin 54911**

**TAX ID#: 311114500**

### INTRODUCTION

This document is the Maintenance Plan for the surface materials (the “Cap”) covering soil contaminated with hexavalent chromium at the property located at 908 N. Lawe Street, Appleton, Wisconsin (the “Property”) in accordance with the requirements of s. NR 724.13(2), Wis. Adm. Code. The contamination originated from former chromium plating operations performed at the Property by the former Appleton Wire. The maintenance activities relate to the existing surface features and materials which occupy the area over the residual soil contamination.

The source Site was identified by BRRTS #02-45-000015. More site-specific information may be obtained from:

- The case file in the Wisconsin Department of Natural Resources (WDNR) Regional office;
- [BRRTS on the Web](#) (WDNR’s internet based data base of contaminated sites) for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
- [RR Sites Map layer](#) for a map view of the Site, and
- The WDNR project manager.

### DESCRIPTION OF CONTAMINATION

Chromium plating occurred in the far eastern part of the Property building, which is currently used by Luvata Appleton as a warehouse. Chromic acid was released to the subsurface from spills and leaks from underground piping. Remediation consisting of blending soil with a

reagent was implemented to immobilize the chromium. Residual hexavalent chromium impacts exists at depths of approximately 2 to 5 feet below ground surface (bgs) under much of the warehouse, the strip of the Property between the south warehouse wall and south Property boundary, as well as beneath the asphalt-paved driveway/parking area north of the warehouse. The magnitude and extent of residual hexavalent chromium contamination in soil is shown on the attached **Figure D.2-1**. The highest concentrations are found around the margins of the treatment areas which were not accessible to the blending equipment.

## **DESCRIPTION OF CAP**

The cap is located on the far west side of the Property, in and around the current Luvata Appleton LLC warehouse, which is an addition to the main plant and borders Meade Street to the east. The cap is comprised of the following components:

- The entire concrete floor of the warehouse;
- The asphalt surface between the north warehouse wall and the north Property boundary; and
- That part of the Property between the south warehouse wall and the boundary with the 714 Hancock Street parcel, extending from Meade Street to the main plant building wall. This area is a combination of asphalt, concrete, and grass.

The location and extent of the cap is depicted on **Figure D.2-2**, including coordinates for several locations defining the perimeter of the cap so that inspection and maintenance, as described below, can be performed in the correct area. Photographs of the cap components are presented in **Attachment D.3**. The asphalt and concrete portions of the cap are anticipated to be 3 to 4 inches thick. The cap is intended to prevent direct-contact with the underlying soil by occupants of the Property, and act as a barrier to infiltration of precipitation, which will minimize soil-to-groundwater contaminant migration.

## **ANNUAL INSPECTION**

The cap will be visually inspected once per year, typically performed in the early spring after all snow and ice has melted and before the seasonal rains begin. The landscaped areas with grass at the surface will be maintained in their present condition, and the inspection will confirm that no significant erosion has occurred. The concrete and asphalt portions of the cap will be inspected to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age, and other factors. Deterioration, cracks and other potential problems that would allow a direct conduit for contact with the underlying soil shall be documented. The inspections will be performed by the Property owner or their designated representative (i.e. tenant, Property manager, etc.).

### ***Cap Maintenance Plan***



A log of the inspections and any repairs will be maintained by the Property owner on WDNR Form 4400-305 (Continuing Obligations Inspection and Maintenance Log), included as **Attachment D.4**. The log will include recommendations for necessary repair of any areas where underlying, potentially contaminated soils are exposed. Once repairs are completed, they will be documented in the Inspection Log. A copy of this Cap Maintenance Plan and the Inspection Log will be kept at the Property and available to all interested parties (i.e. on-site employees, contractors, future Property owners, and WDNR representatives, etc.) for review upon request.

## **MAINTENANCE ACTIVITIES**

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include seeding, planting, patching, filling, pavement resurfacing, or construction operations. In the event that maintenance activities involve soil removal and disposal is necessary, the Property owner must sample any excavated soil prior to disposal to ascertain if contamination is present. The soil must be stored, disposed, or treated by the owner in accordance with applicable local, state and federal law.

In the event the cap overlying the contaminated soil is removed or replaced, the replacement barrier must be equally protective. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Cap Maintenance Plan unless indicated otherwise by the WDNR or its successor.

## **PROHIBITION OF ACTIVITIES AND NOTIFICATION**

The following activities are prohibited on any portion of the Property unless prior written approval has been obtained from the WDNR: 1) removal of the existing cap; 2) replacement with another cap; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; or 6) construction or placement of a building or other structure.

If removal, replacement or other changes to the surface materials are considered, the Property owner will contact WDNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

## **AMENDMENT OR WITHDRAWAL OF MAINTENANCE PLAN**

This Maintenance Plan can be amended or withdrawn by the Property owner and its successors with the written approval of the WDNR.



## CONTACT INFORMATION

Property Owner: Luvata Appleton LLC  
Sam Edwards – Facilities Manager  
PO Box 1714  
Appleton, WI 54912  
920-738-8117

Signature: \_\_\_\_\_

Consultant: EnviroForensics, LLC  
Rob Hoverman, PG  
N16 W23390 Stone Ridge Drive, Suite G  
Waukesha, WI 53188  
(262) 290-4001  
[rhoverman@enviroforensics.com](mailto:rhoverman@enviroforensics.com)

WDNR Project Manager: Dave Neste  
625 East County Rd Y  
Suite 700  
Oshkosh, WI 54901-9731  
Phone: 920-362-2072  
[David.Neste@wisconsin.gov](mailto:David.Neste@wisconsin.gov)

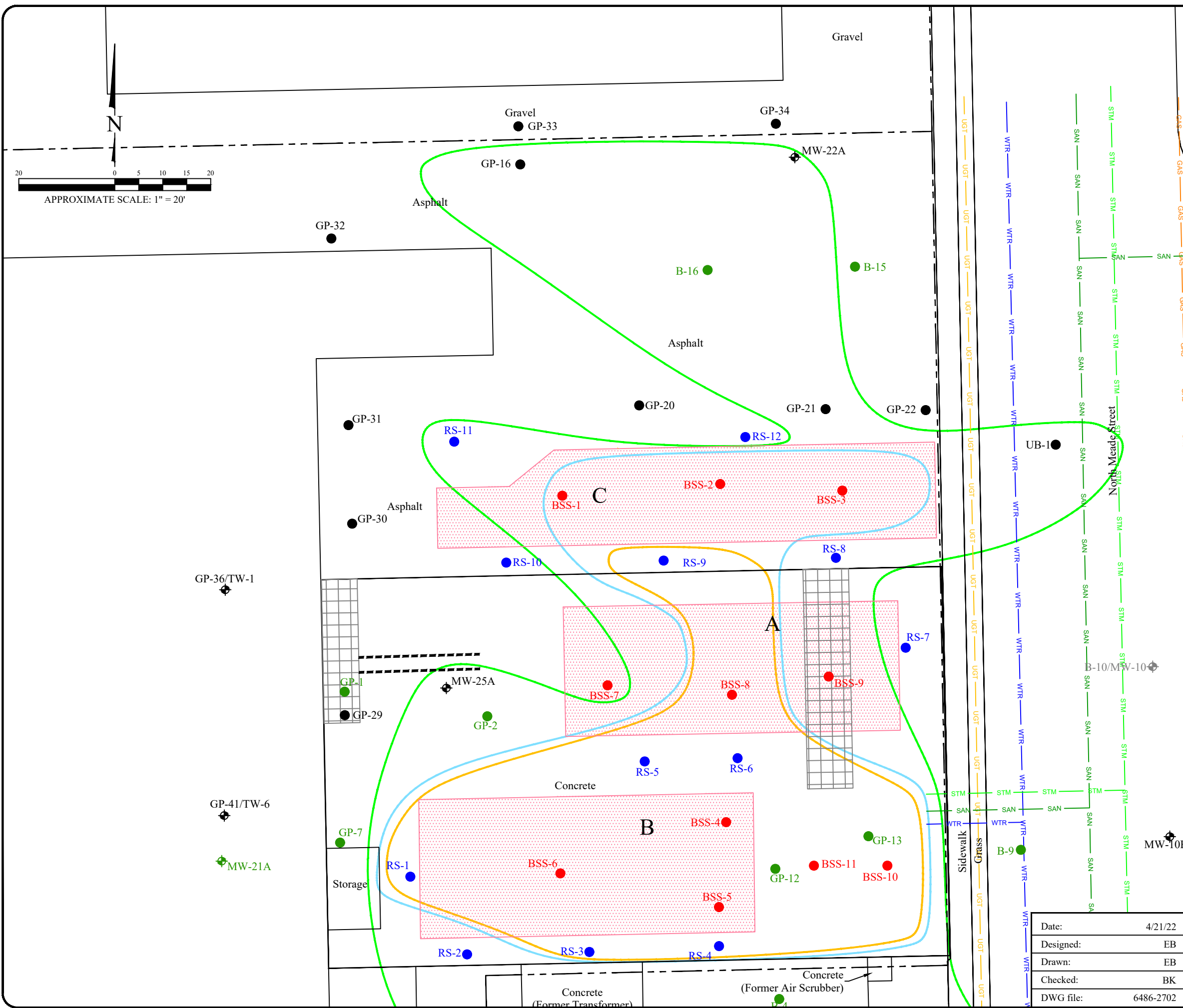




**D.2  
FIGURES**

### Legend

- Property boundary
- Underground gas utility line
- Underground water utility line
- Underground sanitary utility line
- Fiber optics line
- Underground storm utility line
- Pipe chase
- Soil boring (STS)
- Soil boring (Badger)
- Monitoring well (STS)
- Monitoring well (McMahon)
- Monitoring well
- Soil boring/1-inch diameter well
- Soil borings in un-blended areas
- Post-remedial location of soil samples with analytical results
- Dairy tile floor
- Hexavalent chromium concentrations exceeding Non-Industrial Direct Contact RCL (pertains to upper four feet of unsaturated soil)
- Hexavalent chromium concentrations in soil exceeding the soil to groundwater RCL
- Hexavalent chromium concentrations exceeding the Industrial Direct-Contact RCL (pertains to upper 4 feet of unsaturated soil)
- Soil blending areas A, B, and C



**EXTENT OF RESIDUAL HEXAVALENT CHROMIUM CONTAMINATION IN SOIL ON 908 NORTH LAWE STREET**

Albany International - Luvata Site  
 908 North Lawe Street  
 Appleton, Wisconsin

Date:	4/21/22
Designed:	EB
Drawn:	EB
Checked:	BK
DWG file:	6486-2702



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Figure	D.2-1
Project	6486

Russel Metals, Inc.  
975 North Meade Street

Gravel

Asphalt

Asphalt

Asphalt

Former Air Scrubber

Former No. 2 Wire Plating Machine

Concrete

Former No. 1 Wire Plating Machine

Basement

Storage

Concrete (Former Transformer)

Concrete (Former Air Scrubber)

Grass

Grass

Gravel

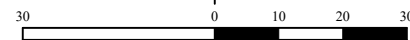
Sidewalk  
Grass

Sidewalk

Asphalt

Luvata Appleton LLC  
908 North Lawe Street

Appvion, Inc.  
714 East Hancock Street



APPROXIMATE SCALE: 1" = 30'

**Legend**

- Property boundary
- Surface cap Concrete
- Surface cap Gravel
- Surface cap Grass
- Surface cap Asphalt

Coordinates area in Wisconsin State Plane NAD 83 Central

PointNo.	Northing(Y)	Easting(X)	Elev(Z)	Description
1	831,333	2,388,878	0.0000	NE Corner
2	831,159	2,388,882	0.0000	SE Corner
3	831,157	2,388,785	0.0000	SW Corner 1
4	831,147	2,388,786	0.0000	SW Corner 2
5	831,147	2,388,770	0.0000	SW Corner 3
6	831,138	2,388,770	0.0000	SW Corner 4
7	831,137	2,388,753	0.0000	SW Corner 5
8	831,330	2,388,749	0.0000	NW Corner

North Meade Street

Sidewalk

820  
Residence

814  
Residence

806  
Residence

802  
Residence

**CAP EXTENT AND COMPONENTS**

Former Appleton Wire  
908 North Lawe Street  
Appleton, Wisconsin

Date:	3/22/22
Designed:	EB
Drawn:	EB
Checked:	BK
DWG file:	6486-2669



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Figure

D.2-2

Project

6486



**D.3  
PHOTOGRAPHS**



View of concrete floor on south side of warehouse, facing west.



View of concrete floor on north side of warehouse, facing west.



View of the asphalt parking area on north side of warehouse, facing west.



View of the asphalt driveway area north of the warehouse, facing northwest.





View of the asphalt driveway area outside the southeast corner of the warehouse,  
facing north.



View of a concrete surface feature near the southeast corner of the warehouse, facing northwest.



View of the grass, gravel, and concrete-covered area along the south wall of the warehouse, facing west. The boundary with the 714 Hancock Street parcel is approximately 3 feet south of warehouse building wall.



View of grass and concrete portions of the cap outside the southwest corner of the warehouse, facing northwest. The asphalt in the photo is on the 714 Hancock Street parcel.



**D.4**  
**CONTINUING OBLIGATIONS INSPECTION AND MAINTENANCE LOG**

**Directions:** In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site) Name <b>Appleton Wire (Former)</b>	BRRTS No. <b>02-45-000015</b>
---	----------------------------------

Inspections are required to be conducted (see closure approval letter):

annually  
 semi-annually  
 other – specify \_\_\_\_\_

When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent to the following email address (see closure approval letter):

**david.neste@wisconsin.gov**

Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maintenance	Previous recommendations implemented?	Photographs taken and attached?
		<input type="checkbox"/> monitoring well <input checked="" type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:	Condition of the cap described and shown in the Cap Maintenance Plan		<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N

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Date added:

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