State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2984 Shawano Avenue
Green Bay WI 54313-6727

Tony Evers, Governor
Preston D. Cole, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

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

Luvata Appleton LLC
ATTN: Sam Edwards
553 Carter Court
Kimberly, WI 54136
Via Electronic Mail Only to 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

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)	• Residual Soil Contamination • Cover for Soil (Maintenance Required) • Residual Groundwater Contamination • Vapor Intrusion (VI) – Future Concern	May 2, 2022
714 E. Hancock Street	• Residual Soil Contamination • Cover for Soil (Maintenance Required) • Residual Groundwater Contamination	May 2, 2022
Meade Street right-of-way	• Residual Soil Contamination • Residual Groundwater Contamination	Not Applicable

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

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.

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, 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

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 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, 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, 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.

Sincerely,

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

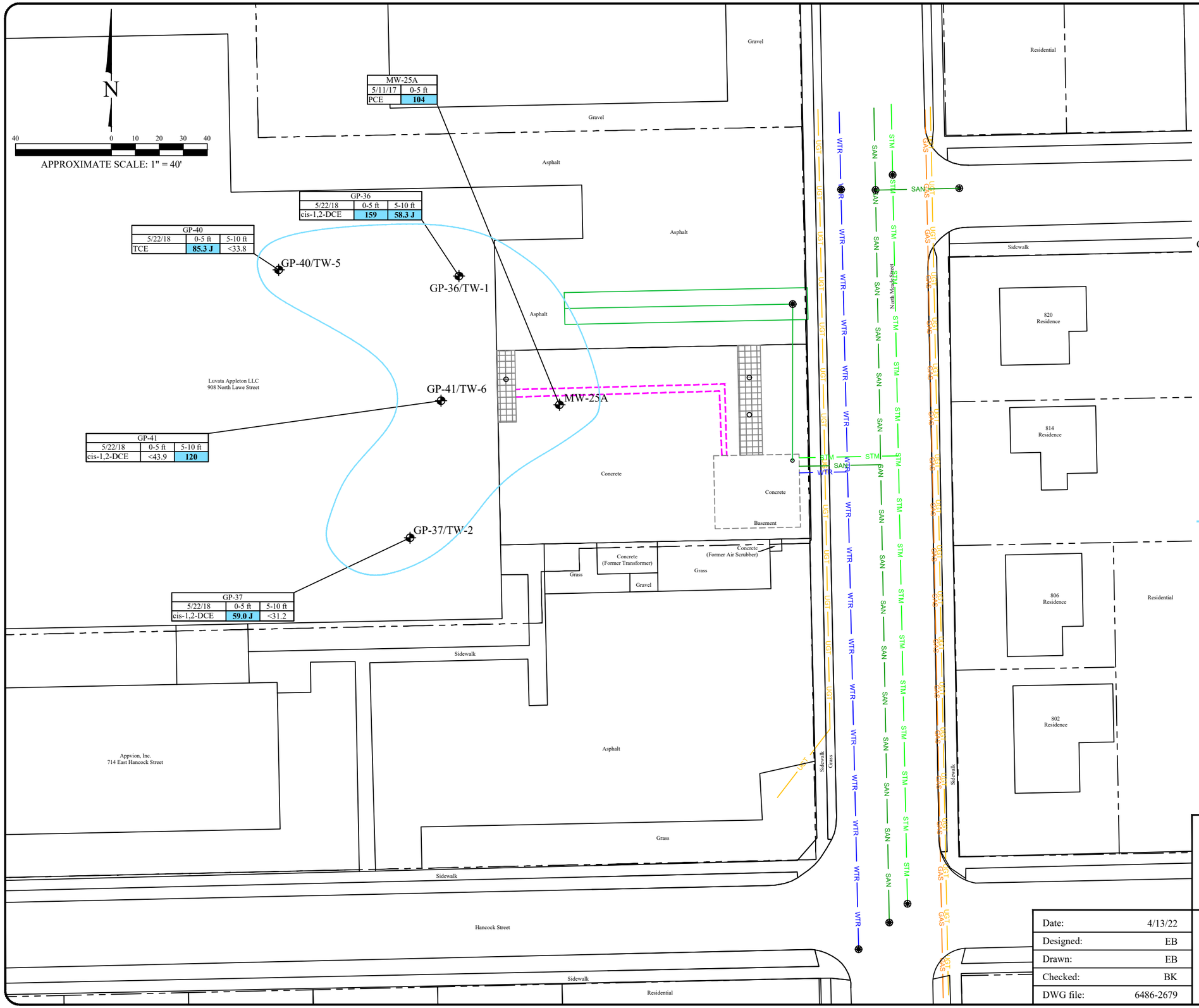
Attachments:

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)
Brian Kappen, EnviroForensics LLC (bkappen@enviroforensics.com)

Additional Resources:
The DNR fact sheets listed below can be obtained by visiting the DNR website at "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
- Underground gas utility line (GAS)
- Underground water utility line (WTR)
- Underground sanitary utility line (SAN)
- Fiber optics line (UGT)
- Underground storm utility line (STM)
- 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	**4.5**	**33,000**	**145,000**
TCE	**3.6**	**1,300**	**8,410**
cis-1,2-DCE	**41.2**	**156,000**	**2,340,000**

Note:
1. Bold shaded blue values exceed WDNR Soil to Groundwater Residual Contaminant Level
2. Results are reported in micrograms per kilogram (µg/kg)
3. PCE = Tetrachloroethene
4. TCE = Trichloroethene
5. cis-1,2-DCE = cis-1,2-Dichloroethene
6. CVOCs = Chlorinated Volatile Organic Compounds
7. RCL = Residual Contaminant Level
8. 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

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

Figure
B.2.b.1

Project
6486

Legend

- Property boundary
- Underground gas utility line
- Underground water utility line
- Underground sanitary utility line
- Fiber optics line
- 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

N

20 10 0 5 10 15 20

APPROXIMATE SCALE: 1" = 20'

Russel Metals, Inc.
975 North Meade Street

Luvata Appleton LLC
908 North Lawe Street

Appvion, Inc.
714 East Hancock Street

Residential

820 Residence

814 Residence

806 Residence

802 Residence

North Meade Street

Sidewalk

Hancock Street

Gravel

Asphalt

Concrete

Concrete (Former Transformer)

Concrete (Former Air Scrubber)

Grass

Storage

GP-35 GP-33 GP-34 GP-16 GP-32 GP-31 GP-20 GP-21 GP-22 GP-30 GP-39/TW-4 GP-41/TW-6 GP-29 GP-2 GP-38/TW-3 GP-7 GP-37/TW-2 GP-15 GP-14 B-2 B-7 B-6 GP-40/TW-5 GP-36/TW-1

MW-22A MW-25A MW-21A MW-10B MW-1B

B-16 B-15 B-10/MW-10 B-9 B-4 B-5/MW-5 B-3 B-2/MW-2 B-1/MW-1

UB-4 UB-1 UB-2 UB-3

RS-11 RS-12 RS-10 RS-9 RS-8 RS-7 RS-5 RS-6 RS-1 RS-2 RS-3 RS-4

BSS-1 BSS-2 BSS-3 BSS-7 BSS-8 BSS-9 BSS-4 BSS-6 BSS-5 BSS-11 BSS-10

A B C

GP-13 GP-12

Figure	B.2.b.2
Project	6486

RESIDUAL SOIL CONTAMINATION - HEXAVALENT CHROMIUM

Former Appleton Wire
908 North Lawe Street
Appleton, Wisconsin

Date:	4/5/19
Designed:	EB
Drawn:	EB
Checked:	BK
DWG file:	6486-2681

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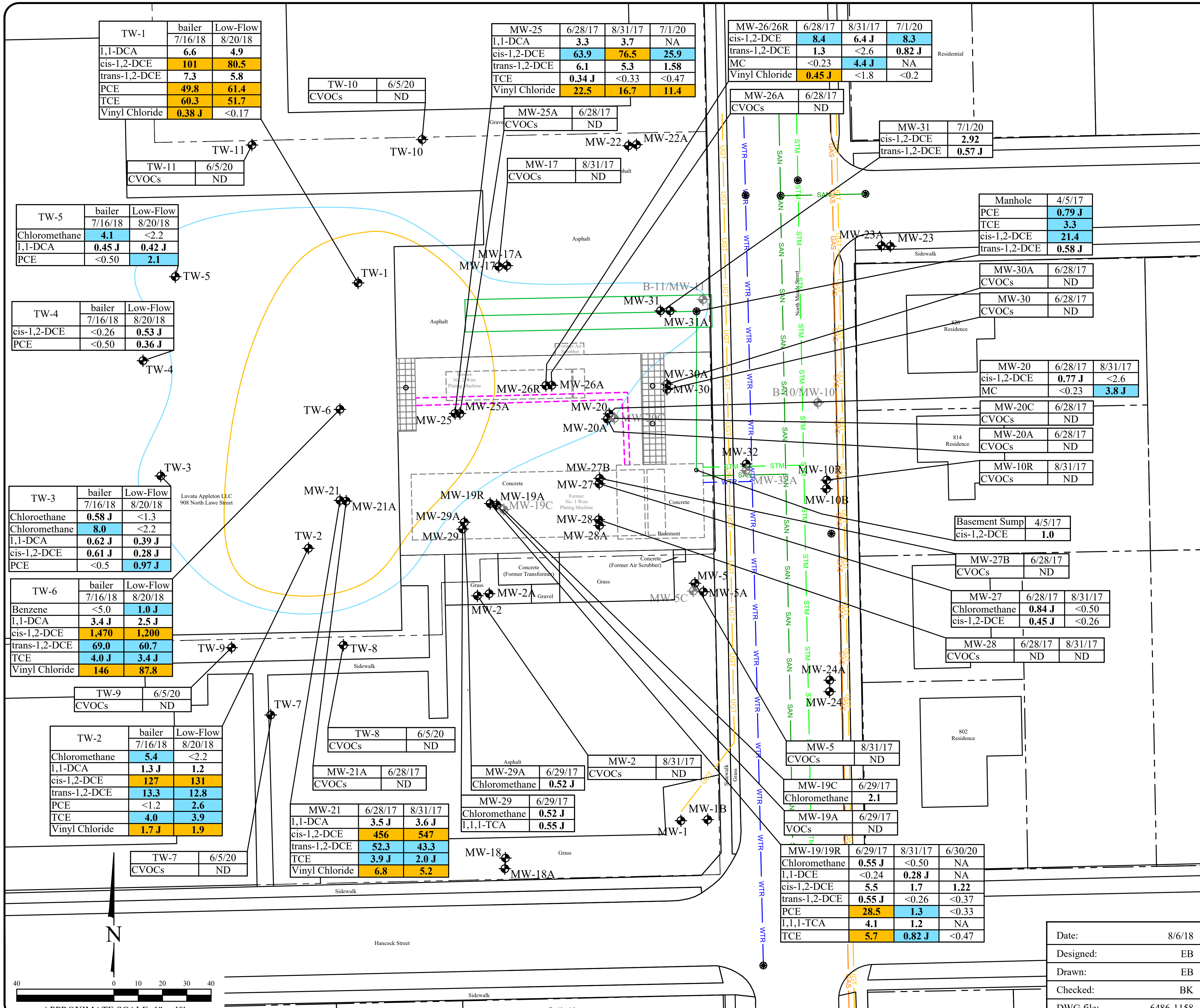
825 North Capitol Avenue • Indianapolis, IN 46204
EnviroForensics.com

No.	Date	Revision	Approved
1	7/3/18	Updates	WF



TW-1	bailer 7/16/18	Low-Flow 8/20/18
1,1-DCA	6.6	4.9
cis-1,2-DCE	**101**	**80.5**
trans-1,2-DCE	7.3	5.8
PCE	**49.8**	**61.4**
TCE	**60.3**	**51.7**
Vinyl Chloride	**0.38 J**	<0.17

TW-10	6/5/20
CVOCs	ND

TW-11	6/5/20
CVOCs	ND

TW-5	bailer 7/16/18	Low-Flow 8/20/18
Chloromethane	**4.1**	<2.2
1,1-DCA	0.45 J	0.42 J
PCE	<0.50	**2.1**

TW-4	bailer 7/16/18	Low-Flow 8/20/18
cis-1,2-DCE	<0.26	0.53 J
PCE	<0.50	0.36 J

TW-3	bailer 7/16/18	Low-Flow 8/20/18
Chloroethane	0.58 J	<1.3
Chloromethane	**8.0**	<2.2
1,1-DCA	0.62 J	0.39 J
cis-1,2-DCE	0.61 J	0.28 J
PCE	<0.5	**0.97 J**

TW-6	bailer 7/16/18	Low-Flow 8/20/18
Benzene	<5.0	**1.0 J**
1,1-DCA	3.4 J	2.5 J
cis-1,2-DCE	**1,470**	**1,200**
trans-1,2-DCE	**69.0**	**60.7**
TCE	**4.0 J**	**3.4 J**
Vinyl Chloride	**146**	**87.8**

TW-9	6/5/20
CVOCs	ND

TW-2	bailer 7/16/18	Low-Flow 8/20/18
Chloromethane	**5.4**	<2.2
1,1-DCA	1.3 J	1.2
cis-1,2-DCE	**127**	**131**
trans-1,2-DCE	**13.3**	**12.8**
PCE	<1.2	**2.6**
TCE	**4.0**	**3.9**
Vinyl Chloride	**1.7 J**	**1.9**

TW-7	6/5/20
CVOCs	ND

TW-8	6/5/20
CVOCs	ND

MW-21A	6/28/17
CVOCs	ND

MW-21	6/28/17	8/31/17
1,1-DCA	3.5 J	3.6 J
cis-1,2-DCE	**456**	**547**
trans-1,2-DCE	**52.3**	**43.3**
TCE	**3.9 J**	**2.0 J**
Vinyl Chloride	**6.8**	**5.2**

MW-29A	6/29/17
Chloromethane	0.52 J

MW-29	6/29/17
Chloromethane	0.52 J
1,1,1-TCA	0.55 J

MW-2	8/31/17
CVOCs	ND

MW-25	6/28/17	8/31/17	7/1/20
1,1-DCA	3.3	3.7	NA
cis-1,2-DCE	**63.9**	**76.5**	**25.9**
trans-1,2-DCE	6.1	5.3	1.58
TCE	0.34 J	<0.33	<0.47
Vinyl Chloride	**22.5**	**16.7**	**11.4**

MW-25A	6/28/17
CVOCs	ND

MW-17	8/31/17
CVOCs	ND

MW-26/26R	6/28/17	8/31/17	7/1/20
cis-1,2-DCE	**8.4**	**6.4 J**	**8.3**
trans-1,2-DCE	1.3	<2.6	0.82 J
MC	<0.23	**4.4 J**	NA
Vinyl Chloride	**0.45 J**	<1.8	<0.2

MW-26A	6/28/17
CVOCs	ND

MW-31	7/1/20
cis-1,2-DCE	2.92
trans-1,2-DCE	0.57 J

Manhole	4/5/17
PCE	**0.79 J**
TCE	**3.3**
cis-1,2-DCE	**21.4**
trans-1,2-DCE	0.58 J

MW-30A	6/28/17
CVOCs	ND

MW-30	6/28/17
CVOCs	ND

MW-20	6/28/17	8/31/17
cis-1,2-DCE	0.77 J	<2.6
MC	<0.23	**3.8 J**

MW-20C	6/28/17
CVOCs	ND

MW-20A	6/28/17
CVOCs	ND

MW-10R	8/31/17
CVOCs	ND

Basement Sump	4/5/17
cis-1,2-DCE	1.0

MW-27B	6/28/17
CVOCs	ND

MW-27	6/28/17	8/31/17
Chloromethane	0.84 J	<0.50
cis-1,2-DCE	0.45 J	<0.26

MW-28	6/28/17	8/31/17
CVOCs	ND	ND

MW-5	8/31/17
CVOCs	ND

MW-19C	6/29/17
Chloromethane	2.1

MW-19A	6/29/17
VOCs	ND

MW-19/19R	6/29/17	8/31/17	6/30/20
Chloromethane	0.55 J	<0.50	NA
1,1-DCE	<0.24	0.28 J	NA
cis-1,2-DCE	5.5	1.7	1.22
trans-1,2-DCE	0.55 J	<0.26	<0.37
PCE	**28.5**	**1.3**	<0.33
1,1,1-TCA	4.1	1.2	NA
TCE	**5.7**	**0.82 J**	<0.47

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-5C — Abandoned monitoring well
- Dairy tile floor

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

Note:

1. Bolded and orange shaded values exceed the Public Health Enforcement Standard
2. Bolded and blue shaded values exceed the Public Health Preventive Action Limit
3. Bolded values are above detection limits
4. J = Analyte concentration less that laboratory detection limits
5. Samples analyzed using EPA SW-846 Method 8260
6. All results reported in units of micrograms per liter (µg/L)
7. PCE = Tetrachloroethene
8. TCE = Trichloroethene
9. 1,1-DCA = 1,1-Dichloroethane
10. cis-1,2-DCE = cis-1,2-Dichloroethene
11. trans-1,2-DCE = trans-1,2-Dichloroethene
12. 1,1,1-TCA = 1,1,1-Tichloroethane
13. MC = Methylene Chloride
14. CVOCs = Chlorinated Volatile Organic Compounds
15. ND = Not detected above laboratory detection limits
16. 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

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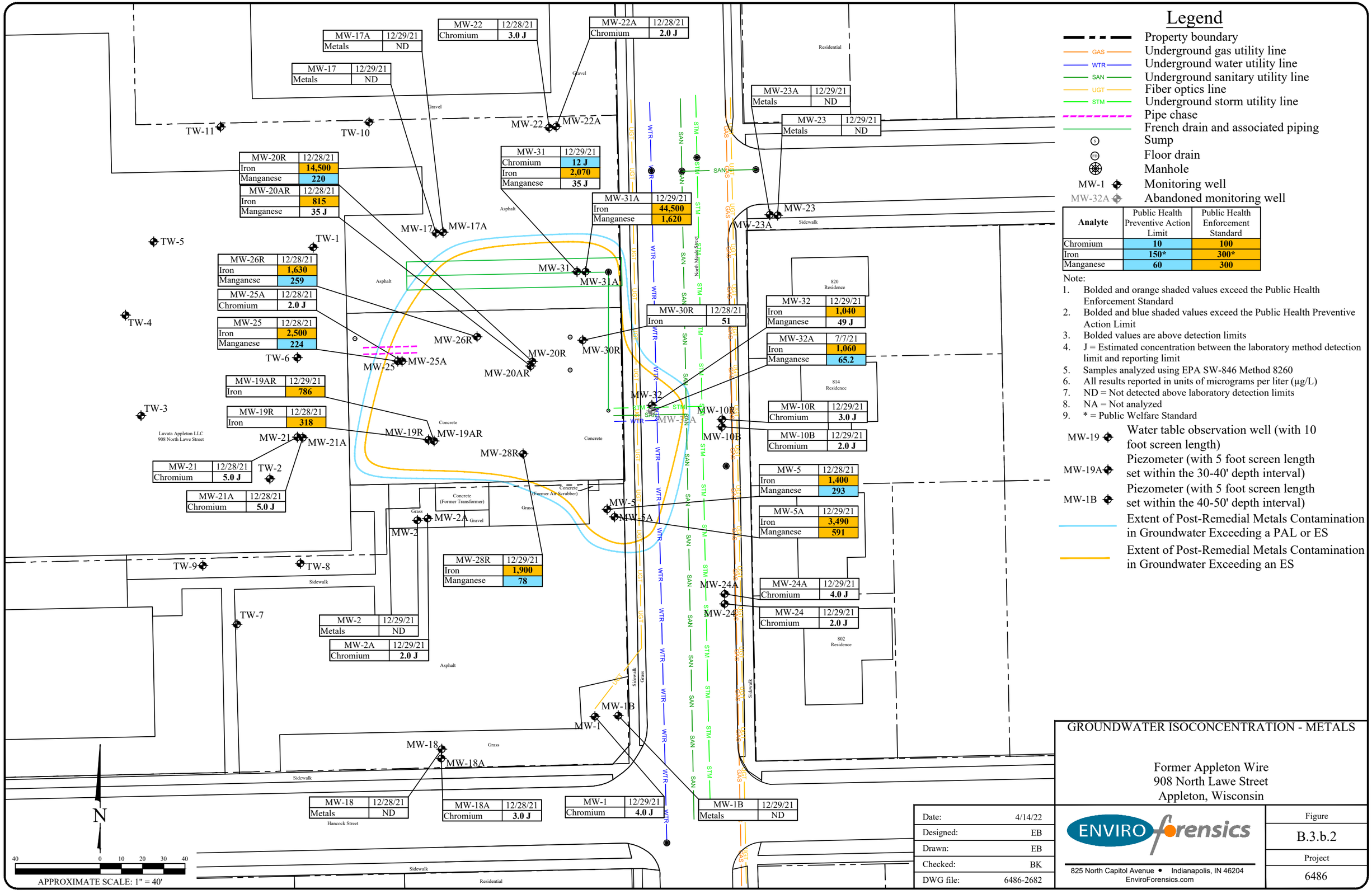
Figure	B.3.b.1
Project	6486



Legend

- Property boundary
- Underground gas utility line
- Underground water utility line
- Underground sanitary utility line
- Fiber optics line
- 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:

1. Bolded and orange shaded values exceed the Public Health Enforcement Standard
2. Bolded and blue shaded values exceed the Public Health Preventive Action Limit
3. Bolded values are above detection limits
4. J = Estimated concentration between the laboratory method detection limit and reporting limit
5. Samples analyzed using EPA SW-846 Method 8260
6. All results reported in units of micrograms per liter (µg/L)
7. ND = Not detected above laboratory detection limits
8. NA = Not analyzed
9. * = 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

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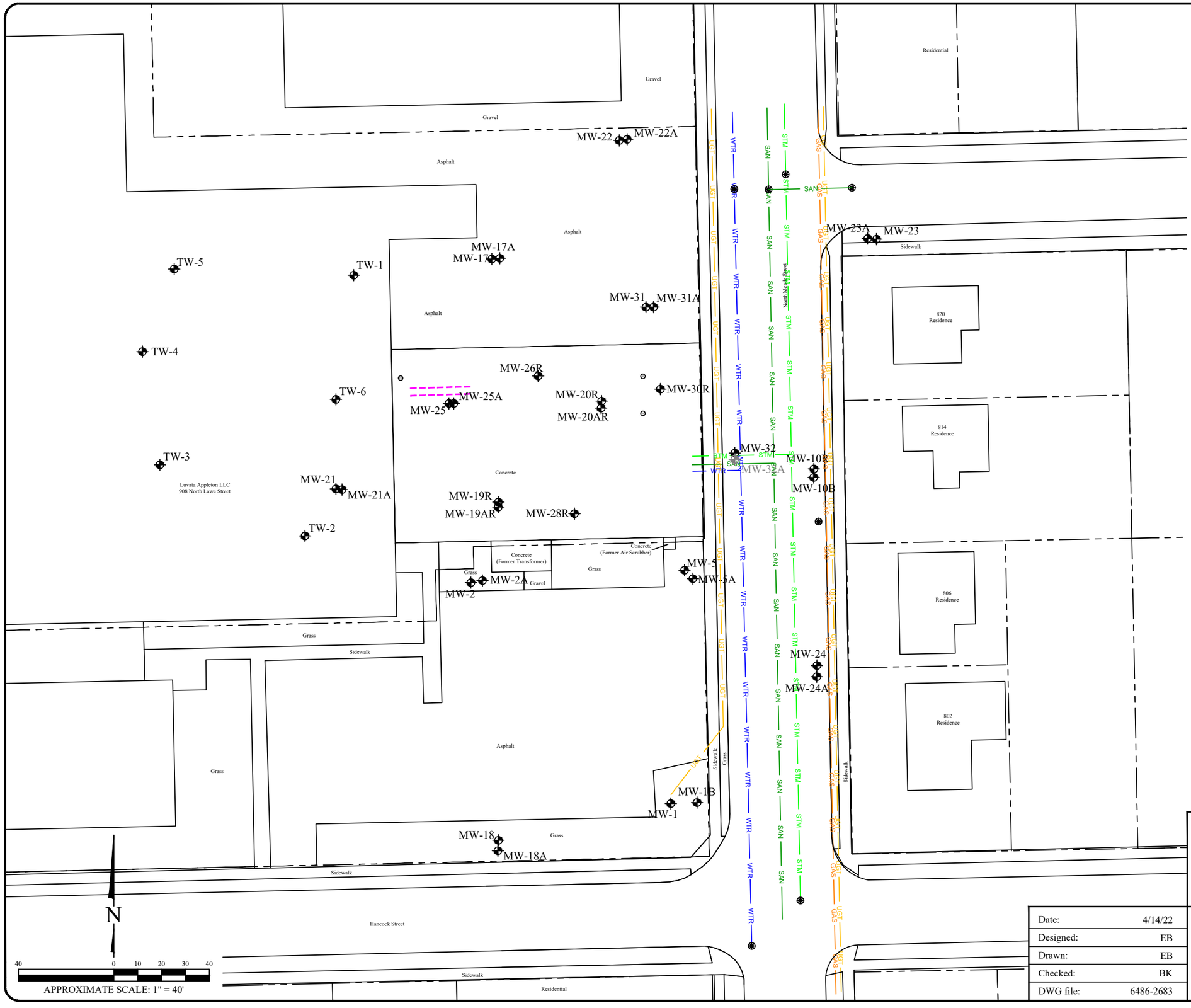
Figure
B.3.b.2

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
- FD — 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.).

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

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

D.2
FIGURES

N

20 0 5 10 15 20

APPROXIMATE SCALE: 1" = 20'

Gravel

Gravel

GP-33

GP-34

MW-22A

GP-16

Asphalt

GP-32

B-16

B-15

Asphalt

GP-20

GP-21

GP-22

GP-31

RS-11

RS-12

UB-1

BSS-2

BSS-1

C

BSS-3

Asphalt

GP-30

RS-10

RS-9

RS-8

GP-36/TW-1

A

RS-7

B-10/MW-10

GP-1

MW-25A

BSS-7

BSS-8

BSS-9

GP-29

GP-2

RS-5

RS-6

Concrete

GP-41/TW-6

B

BSS-4

GP-7

GP-13

MW-21A

RS-1

BSS-6

GP-12

BSS-11

BSS-10

Storage

BSS-5

RS-2

RS-3

RS-4

Concrete
(Former Air Scrubber)

Concrete
(Former Transformer)

B-4

Sidewalk

Grass

B-9

MW-10B

North Meade Street

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
- B-1 — Soil boring (STS)
- GP-1 — Soil boring (Badger)
- MW-1 — Monitoring well (STS)
- MW-18 — Monitoring well (McMahon)
- 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
- 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

Luvata Appleton LLC
908 North Lawe Street

Concrete

Former
No. 1 Wire
Plating Machine

Storage

Basement

Sidewalk

Grass

Concrete
(Former Transformer)

Concrete
(Former Air Scrubber)

Grass

Gravel

Grass

Sidewalk

Asphalt

Appvion, Inc.
714 East Hancock Street

N

30 0 10 20 30

APPROXIMATE SCALE: 1" = 30'

North Meade Street

Sidewalk

820
Residence

814
Residence

806
Residence

802
Residence

Sidewalk

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

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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EnviroForensics.com

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

State of Wisconsin
Department of Natural Resources
dnr.wi.gov

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (2/14)

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: Appleton Wire (Former)

BRRTS No.: 02-45-000015

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?
		☐ monitoring well ☒ cover/barrier ☐ vapor mitigation system ☐ other:	Condition of the cap described and shown in the Cap Maintenance Plan		○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N

Continuing Obligations Inspection and Maintenance Log

{Click to Add/Edit Image}

Date added:

Title:

{Click to Add/Edit Image}

Date added:

Title:

Data Tables

Tables that follow are for reference only and were not included in the Department's closure documentation sent to affected parties

TABLE A.3.a

RESIDUAL SOIL CONTAMINATION - VOLATILE ORGANIC COMPOUNDS

Former Appleton Wire

Boring Identification	Sample Depth (feet)	Sample Date	Saturated (S)/ Unsaturated (U)	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
Industrial RCL [1]				**145,000**	**8,410**	**2,340,000**	**1,850,000**	**2,080**
Non-Industrial RCL [1]				***33,000***	***1,300***	***156,000***	***1,560,000***	***67***
Soil to Goundwater RCL [1]				*4.5*	*3.6*	*41.2*	*62.6*	*0.1*
MW-25A	0-5	5/10/2017	U	*104*	<25.0	<25.0	<25.0	<25.0
GP-36	0-5	5/22/2018	U	<45.5	<45.5	*159*	<45.5	<45.5
	5-10	5/22/2018	S	<44.6	<44.6	*58.3 J*	<44.6	<44.6
GP-37	0-5	5/22/2018	U	<37.9	<37.9	*59.0 J*	<37.9	<37.9
GP-40	0-5	5/22/2018	U	<46.3	*85.3 J*	<46.3	<46.3	<46.3
GP-41	5-10	5/22/2018	S	<32.5	<32.5	*120*	<32.5	<32.5

Notes:

[1] = Residual Contaminant Levels calculated according to the procedures described in WDNR Publication RR-890

Samples analyzed using EPA SW-846 Method 8260B

All concentrations reported in micrograms per kilogram (µg/kg)

Italicized value indicates an exceedance of the Soil to Groundwater Residual Contaminant Level

J = Analyte concentration detected between the laboratory Reporting Limit and the laboratory Method Detection Limit

NA = Not Analyzed

RCL = Residual Contaminant Level

TABLE A.3.b

RESIDUAL SOIL CONTAMINATION - CHROMIUM

Former Appleton Wire

Sample Identification	Sample Depth (Feet)	Sample Date	Saturated (S)/ Unsaturated (U)	Total Chromium	Hexavalent Chromium
Industrial RCL [1]				**NE**	**6.36**
Non-Industrial RCL [1]				*NE*	*0.301*
Soil to Groundwater RCL [1]				***NE***	***3.84***
Background Threshold Value				44	NE
TP-2	15	3/26/1986	S	36.6	**30.8**
C-1	0-1 (Basement Floor)	8/14/1986	U	0.6	*0.6*
C-2	0-0.5 (Basement Floor)	8/14/1986	U	7,317	**7,300**
C-4	0-0.5 (Basement Wall)	8/14/1986	U	57	**57**
C-5	NA (Basement Floor)	8/14/1986	U	20	**20**
C-6	0-0.8	8/14/1986	U	14	**14**
B-2 / MW-2	2-3.5	2/12/1987	U	12.7	*0.4*
B-3	4-5.5	2/12/1987	U	5.6	*0.5*
B-4	2-3.5	2/12/1987	U	7.6	*0.6*
B-5/MW-5A	7.5-9	2/12/1987	S	9.6	*2.6*
	10-11.5	2/12/1987	S	18.2	**18.2**
	12.5-14	2/12/1987	S	29.1	**21.7**
B-9	10-11.5	2/12/1987	S	6.9	*1.9*
B-11 / MW-11	5-6.5	2/12/1987	S	9.4	*1.3*
	7.5-9	2/12/1987	S	9.5	*0.9*
	10-11.5	2/12/1987	S	10.5	**8.1**
B-13	5-6.5	2/12/1987	S	68.8	**68.8**
	7.5-9	2/12/1987	S	44.6	**44.6**
	10-11.5	2/12/1987	S	188	**188**
B-15	7.5-9	2/12/1987	S	5.6	*2*
B-18	2	2/1/1990	U	26.1	NA
	3	2/1/1990	U	46.7	NA
	4	2/1/1990	U	38.7	NA
	5	2/1/1990	U	40	NA
	6	2/1/1990	S	36.6	NA
	7	2/1/1990	S	23.9	NA
	8	2/1/1990	S	20.9	NA
	9	2/1/1990	S	20.2	NA
B-19	2	2/1/1990	U	164	NA
	3	2/1/1990	U	105	NA
	4	2/1/1990	U	138	NA
	5	2/1/1990	U	103	NA
	6	2/1/1990	S	42.8	NA
	7	2/1/1990	S	24.7	NA
	8	2/1/1990	S	23.6	NA
	9	2/1/1990	S	22.6	NA
B-20	2	2/1/1990	U	96.2	NA
	3	2/1/1990	U	111	NA
	4	2/1/1990	U	138	NA
	5	2/1/1990	U	340	NA
	6	2/1/1990	S	167	NA
	7	2/1/1990	S	20.5	NA
	8	2/1/1990	S	22.2	NA
	9	2/1/1990	S	22.2	NA
B-21	2	2/1/1990	U	138	NA
	3	2/1/1990	U	148	NA
	4	2/1/1990	U	170	NA
	5	2/1/1990	U	439	NA
	6	2/1/1990	S	596	NA
	7	2/1/1990	S	280	NA
	8	2/1/1990	S	20.4	NA
	9	2/1/1990	S	19.6	NA
B-22	2	2/1/1990	U	472	NA
	3	2/1/1990	U	150	NA
	4	2/1/1990	U	121	NA
	5	2/1/1990	U	184	NA
	6	2/1/1990	S	510	NA
	7	2/1/1990	S	21	NA
	8	2/1/1990	S	20.9	NA
	9	2/1/1990	S	21.8	NA
B-23	2	2/1/1990	U	20.4	NA
	3	2/1/1990	U	108	NA
	4	2/1/1990	U	142	NA
	5	2/1/1990	U	203	NA
	6	2/1/1990	S	140	NA

TABLE A.3.b

RESIDUAL SOIL CONTAMINATION - CHROMIUM

Former Appleton Wire

Sample Identification	Sample Depth (Feet)	Sample Date	Saturated (S)/ Unsaturated (U)	Total Chromium	Hexavalent Chromium
Industrial RCL [1]				**NE**	**6.36**
Non-Industrial RCL [1]				*NE*	*0.301*
Soil to Groundwater RCL [1]				***NE***	***3.84***
Background Threshold Value				44	NE
GP-1	15-20	5/13/2014	S	62	<0.234
GP-3	5-10	5/13/2014	S	55	<0.223
GP-6	0-5	5/13/2014	U	51	<0.229
	5-10	5/13/2014	S	18	*1.23*
	10-15	5/13/2014	S	23	*1.35*
GP-7	5-10	5/12/2014	S	18	*0.368*
	10-15	5/12/2014	S	22	*0.582*
	15-20	5/12/2014	S	28	0.287
GP-8	0-5	5/12/2014	U	39	*0.45*
	5-10	5/12/2014	S	48	*0.761*
	10-15	5/12/2014	S	46	*0.709*
GP-9	5-10	5/12/2014	S	42	*0.748*
	15-20	5/12/2014	S	15	*0.774*
GP-10	0-5	5/12/2014	U	77	*1.03*
GP-11	0-5	5/12/2014	U	1,130	***4.48***
	5-10	5/12/2014	S	76	*1.77*
	10-15	5/12/2014	S	45	<0.235
GP-12	0-5 (Basement Floor)	5/12/2014	U	355	<0.221
	5-10 (Basement Floor)	5/12/2014	S	128	<0.237
GP-13	0-5 (Basement Floor)	5/12/2014	U	164	*3.06*
	5-11 (Basement Floor)	5/12/2014	S	43	*0.306*
GP-16	0-5	5/16/2017	U	NA	*2.02*
GP-17	0-5 (Basement Floor)	5/15/2017	U	1,550	NA
	5-10 (Basement Floor)	5/15/2017	S	25.8	NA
	10-15 (Basement Floor)	5/15/2017	S	24.6	NA
	15-20 (Basement Floor)	5/15/2017	S	25.5	NA
GP-18	0-5	5/15/2017	U	58.4	NA
	5-10	5/15/2017	S	53.0	NA
	10-15	5/15/2017	S	55.7	NA
	15-20	5/15/2017	S	24.8	NA
GP-19	0-5	5/15/2017	U	30.6	NA
	5-10	5/15/2017	S	44.9	NA
	10-15	5/15/2017	S	25.3	NA
	15-20	5/15/2017	S	23.9	NA
GP-20	0-5	8/30/2017	U	69.5	<0.900
	5-10	8/30/2017	S	53.1	NA
	10-15	8/30/2017	S	111	NA
	15-20	8/30/2017	S	23.9	NA
GP-21	0-5	8/30/2017	U	44.6	*1.59*
	5-10	8/30/2017	S	70.5	NA
	10-15	8/31/2017	S	53.5	NA
	15-19.5	8/30/2017	S	65.9	NA
	19.5-20	8/30/2017	S	10.8	NA
GP-22	0-5	8/30/2017	U	52.3	<0.900
	5-10	8/30/2017	S	45.6	NA
	10-15	8/30/2017	S	34.1	NA
	15-20	8/30/2017	S	25.7	NA
GP-23	0-5	8/30/2017	U	1,180	*1.03*
	5-10	8/30/2017	S	3,690	NA
	10-15	8/30/2017	S	126	NA
	15-20	8/30/2017	S	834	NA
GP-24	0-5	1/18/2018	U	680	NA
	5-10	1/18/2018	S	77.9	NA
	10-15	1/18/2018	S	31.0	NA
	15-20	1/18/2018	S	26.0	NA
GP-25	0-5	1/18/2018	U	556	NA
	5-10	1/18/2018	S	86.6	NA
	10-15	1/18/2018	S	65.5	NA
	15-20	1/18/2018	S	59.2	NA
GP-26	0-5	1/18/2018	U	145	NA
	5-10	1/18/2018	S	47.7	NA
	10-15	1/18/2018	S	54.0	NA
	15-20	1/18/2018	S	24.7	NA
GP-27	0-5	1/18/2018	U	3,410	NA
	5-10	1/18/2018	S	122	NA
	10-15	1/18/2018	S	174	NA
	15-20	1/18/2018	S	283	NA

TABLE A.3.b

RESIDUAL SOIL CONTAMINATION - CHROMIUM

Former Appleton Wire

Sample Identification	Sample Depth (Feet)	Sample Date	Saturated (S)/ Unsaturated (U)	Total Chromium	Hexavalent Chromium
Industrial RCL [1]				**NE**	**6.36**
Non-Industrial RCL [1]				*NE*	*0.301*
Soil to Groundwater RCL [1]				***NE***	***3.84***
Background Threshold Value				44	NE
GP-28	0-5	1/18/2018	U	10.1	NA
	10-15	1/18/2018	S	18.9	NA
	15-20	1/18/2018	S	189	NA
GP-32	0-5	5/23/2018	U	12.8	*0.841 J*
MW-19A	10-15	6/30/2009	S	99	**19**
MW-19C	0-5	5/8/2017	U	NA	*2.20*
	10-15	5/8/2017	S	NA	**171**
	40-45	5/8/2017	S	23.7	NA
	45-50	5/8/2017	S	24.8	NA
	50-55	5/8/2017	S	23.9	NA
	55-60	5/8/2017	S	24.1	NA
MW-20A	0-5	5/13/2014	U	362	*3.08*
	5-10	5/13/2014	S	146	*0.941*
	10-15	5/13/2014	S	263	*0.343*
	15-20	5/13/2014	S	24	*0.469*
	20-25	5/13/2014	S	16	*0.55*
MW-20C	0-5	5/15/2017	U	NA	**37.9**
	10-15	5/15/2017	S	NA	**122**
	40-45	5/15/2017	S	25.4	NA
	45-50	5/15/2017	S	26.1	NA
	50-55	5/15/2017	S	24.0	NA
	55-60	5/15/2017	S	24.1	NA
MW-22A	0-5	5/16/2017	U	NA	*1.88*
MW-25A	0-5	5/11/2017	U	41.6	*2.07*
	0-5	DUP-4	U	30.3	NA
	5-10	5/11/2017	S	29.4	NA
MW-25A	15-20	5/11/2017	S	27.8	NA
	25-30	5/11/2017	S	24.6	NA
	35-40	5/11/2017	S	23.9	NA
MW-26A	0.5-1	5/11/2017	U	574	NA
	0-5	5/11/2017	U	131	***4.29***
	0-5	DUP-5	U	37.2	NA
	5-10	5/11/2017	S	130	NA
	10-15	5/11/2017	S	192	**35.1**
	15-20	5/11/2017	S	26.8	NA
	25-30	5/11/2017	S	23.9	NA
	35-40	5/11/2017	S	25.1	NA
MW-27B	0-5	5/10/2017	U	65.9	**25.3**
	0-5	DUP-3	U	60.0	**19.8**
	5-10	5/10/2017	S	64.1	NA
	10-15	5/10/2017	S	38.6	**8.13**
	15-20	5/10/2017	S	29.9	NA
	25-30	5/10/2017	S	25.5	NA
	35-40	5/10/2017	S	12.3	NA
	40-45	5/10/2017	S	25.2	NA
	45-50	5/10/2017	S	24.6	NA
MW-28A	0-1	5/11/2017	U	2,620	NA
	0-5	5/10/2017	U	1,850	**422**
	0-5	DUP-1	U	1,580	**516**
	4-5	5/11/2017	U	328	NA
	5-10	5/10/2017	S	90.9	NA
	5-10	DUP-2	S	104	NA
	10-15	5/10/2017	S	36.6	*2.20*
	15-20	5/10/2017	S	27.9	NA
	25-30	5/10/2017	S	25.3	NA
	35-40	5/10/2017	S	23.7	NA
MW-29A	0-5	5/9/2017	U	575	**12.0**
	5-10	5/9/2017	S	42.9	NA
	10-15	5/9/2017	S	30.1	*1.24*
	15-20	5/9/2017	S	53.9	NA
	25-30	5/9/2017	S	25.9	NA
	35-40	5/9/2017	S	25.7	NA

TABLE A.3.b

RESIDUAL SOIL CONTAMINATION - CHROMIUM

Former Appleton Wire

Sample Identification	Sample Depth (Feet)	Sample Date	Saturated (S)/ Unsaturated (U)	Total Chromium	Hexavalent Chromium
Industrial RCL [1]				**NE**	**6.36**
Non-Industrial RCL [1]				*NE*	*0.301*
Soil to Groundwater RCL [1]				***NE***	***3.84***
Background Threshold Value				44	NE
MW-30A	0-5	5/12/2017	U	78.8	*2.54*
	0-5	DUP-6	U	68.1	*1.74*
	5-10	5/12/2017	S	24.4	NA
	15-20	5/12/2017	S	53.1	NA
	25-30	5/12/2017	S	25.0	NA
	35-40	5/12/2017	S	20.9	NA
WS-1	8	8/30/2017	S	55.3	NA
WS-2	8	8/30/2017	S	1,160	NA
WS-3	8	8/30/2017	S	6.5	NA
WS-4	8	8/30/2017	S	6.4	NA
OW-1	0-5	1/18/2018	U	241	NA
	5-10	1/18/2018	S	77.2	NA
	10-15	1/18/2018	S	135	NA
	15-20	1/18/2018	S	104	NA
OW-2	0-5	1/18/2018	U	16.4	NA
	5-10	1/18/2018	S	36.9	NA
	10-15	1/18/2018	S	207	NA
	15-20	1/18/2018	S	72.1	NA
OW-3	0-5	1/19/2018	U	99.8	NA
	5-10	1/19/2018	S	27.5	NA
	10-15	1/19/2018	S	27.2	NA
	15-20	1/19/2018	S	18.1	NA
UB-1	0-5	5/16/2017	U	NA	*1.51*
UB-2	0-5	5/16/2017	U	NA	*1.84*
RS-1	0-5	8/28/2019	U	918	**36.1**
RS-2	0-5	8/28/2019	U	33.7	*2.25*
RS-3	0-5	8/28/2019	U	732	**15.4**
RS-4	0-5	8/28/2019	U	853	**310**
RS-5	0-5	8/28/2019	U	1,330	**620**
RS-6	0-5	8/28/2019	U	362	**53.5**
RS-8	0-5	8/28/2019	U	860	*1.97 J*
RS-9	0-5	8/28/2019	U	6,740	**56.5**
RS-10	0-5	8/28/2019	U	95.8	<0.64
RS-11	0-5	8/28/2019	U	147	*1.45 J*
BSS-1	0-5	9/24/2019	U	338	***4.93***
BSS-2	0-5	9/25/2019	U	504	***4.34***
BSS-3	0-5	9/26/2019	U	336	***4.62***
BSS-4	0-5	9/27/2019	U	441	**13.1**
BSS-5	0-5	9/27/2019	U	189	**11.1**
BSS-6	0-5	9/27/2019	U	482	**18**
BSS-7	0-5	10/1/2019	U	86.2	<0.64
BSS-8	0-5	10/2/2019	U	169	**11.1**
BSS-9	0-5	10/2/2019	U	84.2	*0.836 J*
BSS-10	0-5	10/8/2019	U	373	**9.32**
BSS-11	0-5	10/8/2019	U	291	**15.6**

Notes:

[1] = Residual Contaminant Levels calculated according to the procedures described in WDNR Publication RR-890

Total chromium samples analyzed using EPA SW-846 Method 6010C

Hexavalent chromium samples analyzed using EPA SW-846 Method 7196A

All concentrations reported in milligrams per kilogram (mg/kg)

Bolded value indicates an exceedance of the Industrial Residual Contaminant Level

Bolded and Italicized values exceed the Soil to Groundwater Residual Contaminant Level

Italicized value indicates an exceedance of the Non-Industrial Residual Contaminant Level

J = Analyte concentration between the method detection limit and reporting limit

NA = Not Analyzed

NE = Not Established

RCL = Residual Contaminant Level

TABLE A.1.a

GROUNDWATER ANALYTICAL - VOLATILE ORGANIC COMPOUNDS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Benzene	Chloroethane	Chloromethane	1,1-Dichloroethane	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Methylene Chloride	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene	Vinyl Chloride
Public Health Enforcement Standard		**5**	**400**	**30**	**850**	**70**	**100**	**5**	**5**	**200**	**5**	**0.2**
Public Health Preventive Action Limit		*0.5*	*80*	*3*	*85*	*7*	*10*	*0.5*	*0.5*	*20*	*0.5*	*0.02*
Basement Sump (abandoned 9-2019)	4/5/2017	NA	NA	<0.50	<0.24	1.0	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
Manhole (abandoned 9-2019)	4/5/2017	NA	NA	<0.50	<0.24	*21.4*	0.58 J	<0.23	*0.79 J*	<0.50	*3.3*	<0.18
MW-2	8/31/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-5	8/31/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-10R	4/5/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
	8/31/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-17	8/31/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-19	4/5/2017	NA	NA	<0.50	0.26 J	3.1	<0.26	<0.23	**8.7**	2.5	*3.3*	<0.18
	6/29/2017	NA	NA	0.55 J	<0.24	5.5	0.55 J	<0.23	**28.5**	4.1	**5.7**	<0.18
	8/31/2017	NA	NA	<0.50	0.28 J	1.7	<0.26	<0.23	*1.3*	1.2	*0.82 J*	<0.18
Dup-3	8/31/2017	NA	NA	<0.50	0.30 J	4.9	0.49 J	<0.23	**19.3**	3.0	*4.4*	<0.18
MW-19R	6/30/2020	NA	NA	NA	NA	1.22	<0.37	NA	<0.33	NA	<0.47	<0.2
MW-19A	6/29/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-19C	6/29/2017	NA	NA	2.1	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-20	4/5/2017	NA	NA	<0.50	<0.24	0.31 J	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
	6/28/2017	NA	NA	<0.50	<0.24	0.77 J	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
	8/31/2017	NA	NA	<5.0	<2.4	<2.6	<2.6	*3.8 J*	<5.0	<5.0	<3.3	<1.8
MW-20A	6/28/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-20C	6/28/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-21	6/28/2017	NA	NA	<0.50	3.5 J	**456**	*52.3*	<0.23	<0.50	<0.50	*3.9 J*	**6.8**
	8/31/2017	NA	NA	<2.5	3.6 J	**547**	*43.3*	<1.2	<2.5	<2.5	*2.0 J*	**5.2**
MW-21A	6/28/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18

TABLE A.1.a

GROUNDWATER ANALYTICAL - VOLATILE ORGANIC COMPOUNDS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Benzene	Chloroethane	Chloromethane	1,1-Dichloroethane	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Methylene Chloride	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene	Vinyl Chloride
Public Health Enforcement Standard		**5**	**400**	**30**	**850**	**70**	**100**	**5**	**5**	**200**	**5**	**0.2**
Public Health Preventive Action Limit		*0.5*	*80*	*3*	*85*	*7*	*10*	*0.5*	*0.5*	*20*	*0.5*	*0.02*
MW-25	6/28/2017	NA	NA	<0.50	3.3	*63.9*	6.1	<0.23	<0.50	<0.50	0.34 J	**22.5**
	8/31/2017	NA	NA	<0.50	3.7	**76.5**	5.3	<0.23	<0.50	<0.50	<0.33	**16.7**
	7/1/2020	NA	NA	NA	NA	*25.9*	1.58	NA	<0.33	NA	<0.47	**11.4**
MW-25A	6/28/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-26	6/28/2017	NA	NA	<0.50	<0.24	*8.4*	1.3	<0.23	<0.50	<0.50	<0.33	**0.45 J**
Dup-1	6/28/2017	NA	NA	<0.50	0.27 J	*8.1*	1.0	<0.23	<0.50	<0.50	<0.33	**0.48 J**
MW-26	8/31/2017	NA	NA	<5.0	<2.4	6.4 J	<2.6	*4.4 J*	<5.0	<5.0	<3.3	<1.8
MW-26R	7/1/2020	NA	NA	NA	NA	*8.3*	0.82 J	NA	<0.33	NA	<0.47	<0.2
MW-26A	6/28/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-27	6/28/2017	NA	NA	0.84 J	<0.24	0.45 J	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
Dup-2	6/28/2017	NA	NA	0.62J	<0.24	0.55 J	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-27	8/31/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-27B	6/28/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-28	6/28/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
	8/31/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-28A	6/28/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-29	6/29/2017	NA	NA	0.52 J	<0.24	<0.26	<0.26	<0.23	<0.50	0.55 J	<0.33	<0.18
MW-29A	6/29/2017	NA	NA	0.69 J	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-30	6/28/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-30A	6/28/2017	NA	NA	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
MW-31	7/2/2020	NA	NA	NA	NA	2.92	0.57 J	NA	<0.33	NA	<0.47	<0.2

TABLE A.1.a

GROUNDWATER ANALYTICAL - VOLATILE ORGANIC COMPOUNDS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Benzene	Chloroethane	Chloromethane	1,1-Dichloroethane	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Methylene Chloride	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene	Vinyl Chloride
Public Health Enforcement Standard		**5**	**400**	**30**	**850**	**70**	**100**	**5**	**5**	**200**	**5**	**0.2**
Public Health Preventive Action Limit		*0.5*	*80*	*3*	*85*	*7*	*10*	*0.5*	*0.5*	*20*	*0.5*	*0.02*
TW-1	7/16/2018	<0.50	<0.37	<0.50	6.6	**101**	7.3	<0.23	**49.8**	<0.50	**60.3**	**0.38 J**
	8/20/2018	<0.25	<1.3	<2.2	4.9	**80.5**	5.8	<0.58	**61.4**	<0.24	**51.7**	<0.17
TW-2	7/16/2018	<1.2	<0.94	*5.4*	1.3 J	**127**	*13.3*	<0.58	<1.2	<1.2	*4.0*	**1.7 J**
	8/20/2018	<0.25	<1.3	<2.2	1.2	**131**	*12.8*	<0.58	*2.6*	<0.24	*3.9*	**1.9**
TW-3	7/16/2018	<0.50	0.58 J	*8.0*	0.62 J	0.61 J	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
	8/20/2018	<0.25	<1.3	<2.2	0.39 J	0.28 J	<1.1	<0.58	*0.97 J*	<0.24	<0.26	<0.17
TW-4	7/16/2018	<0.50	<0.37	<0.50	<0.24	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
	8/20/2018	<0.25	<1.3	<2.2	<0.27	0.53 J	<1.1	<0.58	0.36 J	<0.24	<0.26	<0.17
TW-5	7/16/2018	<0.50	<0.37	*4.1*	0.45 J	<0.26	<0.26	<0.23	<0.50	<0.50	<0.33	<0.18
	8/20/2018	<0.25	<1.3	<2.2	0.42 J	<0.27	<1.1	<0.58	*2.1*	<0.24	<0.26	<0.17
TW-6	7/16/2018	<5.0	<3.7	<5.0	3.4 J	**1,470**	*69.0*	<2.3	<5.0	<5.0	*4.0 J*	**146**
	8/20/2018	*1.0 J*	<5.4	<8.8	2.5 J	**1,200**	*60.7*	<2.3	<1.3	<0.98	*3.4 J*	**87.8**
TW-7	6/5/2020	NA	NA	NA	NA	<0.39	<0.37	NA	<0.33	NA	<0.47	<0.2
TW-8	6/5/2020	NA	NA	NA	NA	<0.39	<0.37	NA	<0.33	NA	<0.47	<0.2
TW-9	6/5/2020	NA	NA	NA	NA	<0.39	<0.37	NA	<0.33	NA	<0.47	<0.2
TW-10	6/5/2020	NA	NA	NA	NA	<0.39	<0.37	NA	<0.33	NA	<0.47	<0.2
TW-11	6/5/2020	NA	NA	NA	NA	<0.39	<0.37	NA	<0.33	NA	<0.47	<0.2

Notes:

All concentrations reported in units of micrograms per liter (µg/L)

Samples analyzed using EPA SW-846 Method 8260B

Bolded values are above the Public Health Enforcement Standard

Italicized values are above the Public Health Preventive Action Limit

J = Analyte concentration detected between the laboratory Reporting Limit and the laboratory Method Detection Limit

NA = Not Analyzed

TABLE A.1.b

GROUNDWATER ANALYTICAL - METALS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Dissolved Chromium	Dissolved Hexavalent Chromium	Dissolved Manganese	Dissolved Iron
Public Health Enforcement Standard		**100**	**NE**	**300**	**300***
Public Health Preventive Action Limit		*10*	*NE*	*60*	*150**
B-1	6/5/1985	**190**	190	NA	NA
	6/14/1985	**300**	300	NA	NA
B-2	6/5/1985	**8,400**	8,400	NA	NA
	6/14/1985	**17,000**	17,000	NA	NA
B-3	6/5/1985	**27,000**	23,000	NA	NA
	6/14/1985	**32,000**	22,000	NA	NA
	1/24/1986	**15,400**	14,000	NA	NA
GMW-01	6/30/2004	**5,300**	5,100	NA	NA
	8/1/2007	**8,490**	NA	NA	NA
	10/24/2007	**3,085**	1,900	NA	NA
	1/16/2008	**3,020**	2,260	NA	NA
	4/23/2008	**2,001**	2,000	NA	NA
GMW-02	6/30/2004	**5,700**	4,700	NA	NA
	8/1/2004	**6,355**	NA	NA	NA
	10/24/2007	**6,115**	6,115	NA	NA
	1/16/2008	**7,040**	6,800	NA	NA
	4/23/2008	**6,600**	4,900	NA	NA
GMW-03	6/30/2004	**5,000**	4,700	NA	NA
	8/1/2004	**4,790**	NA	NA	NA
	10/24/2007	**3,545**	2,300	NA	NA
	1/16/2008	**4,550**	3,100	NA	NA
	4/23/2008	**3,320**	1,400	NA	NA
GMW-04	6/30/2004	*52*	52	NA	NA
	8/1/2004	*56*	NA	NA	NA
	10/24/2007	*14*	<2.0	NA	NA
	1/16/2008	*31*	<0.002	NA	NA
	4/23/2008	3.7	<2.0	NA	NA
GMW-05	6/30/2004	*40*	34	NA	NA
	8/1/2004	*55*	NA	NA	NA
	10/24/2007	5.6	<2.0	NA	NA
	1/16/2008	8.5	<0.002	NA	NA
	4/23/2008	*31.0*	<2.0	NA	NA
GMW-06	6/30/2004	3.3	<2	NA	NA
	8/1/2004	4.2	NA	NA	NA
	10/24/2007	3.5	<2.0	NA	NA
	1/16/2008	3.3	<0.002	NA	NA
	4/23/2008	5.2	<2.0	NA	NA
GMW-07	6/30/2004	0.8	<2	NA	NA
	8/1/2004	1.7	NA	NA	NA
	10/24/2007	2.3	<2.0	NA	NA
	1/16/2008	*13.0*	<0.002	NA	NA
	4/23/2008	3.1	<2.0	NA	NA
GMW-08	6/30/2004	0.4	<2	NA	NA
	8/1/2004	1.4	NA	NA	NA
	10/24/2007	**489**	270	NA	NA
	1/16/2008	8.6	<0.002	NA	NA
	4/23/2008	**101**	20	NA	NA
GMW-09	6/30/2004	1.3	<2	NA	NA
	8/1/2004	1.5	NA	NA	NA
	10/24/2007	2.8	<2.0	NA	NA
	1/16/2008	9.3	<0.002	NA	NA
	4/23/2008	4.2	<2.0	NA	NA
GMW-10	6/30/2004	0.5	<2	NA	NA
	8/1/2004	0.6	NA	NA	NA
	10/24/2007	*11.0*	<2.0	NA	NA
	1/16/2008	0.5	<0.002	NA	NA
	4/23/2008	2.6	<2.0	NA	NA
GMW-11	6/30/2004	1.1	<2	NA	NA
	8/1/2004	1.9	NA	NA	NA
	10/24/2007	3.6	<2.0	NA	NA
	1/16/2008	5.6	<0.002	NA	NA
	4/23/2008	4.1	<2.0	NA	NA
GP-7 (Temp)	5/12/2014	**183**	29	NA	NA
GP-13 (Temp)	5/13/2014	**2,991**	1,600	NA	NA
MW-1	2/9/1987	*50*	50	NA	NA
	7/29/1987	<40	NA	NA	NA
	9/25/1987	<100	NA	NA	NA
	12/11/1987	<100	NA	NA	NA
	3/21/1988	1.6	NA	NA	NA
	6/13/1988	3.0	NA	NA	NA
	9/8/1988	9	NA	NA	NA
	12/15/1988	2.5	NA	NA	NA
	3/26/1992	<40	NA	NA	NA
	6/16/1992	4.9	NA	NA	NA
	9/4/1992	*50*	NA	NA	NA

TABLE A.1.b

GROUNDWATER ANALYTICAL - METALS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Dissolved Chromium	Dissolved Hexavalent Chromium	Dissolved Manganese	Dissolved Iron
Public Health Enforcement Standard		**100**	**NE**	**300**	**300***
Public Health Preventive Action Limit		*10*	*NE*	*60*	*150**
MW-1 (continued)	12/17/1992	NA	NA	NA	NA
	3/25/1993	<80	NA	NA	NA
	6/22/1993	NA	NA	NA	NA
	9/16/1993	<80	NA	NA	NA
	12/3/1993	NA	NA	NA	NA
	3/15/1994	<70	NA	NA	NA
	6/16/1994	NA	NA	NA	NA
	9/20/1994	*13*	NA	NA	NA
	12/13/1994	NA	NA	NA	NA
	3/31/1995	*39*	NA	NA	NA
	6/15/1995	NA	NA	NA	NA
	9/7/1995	7.2	NA	NA	NA
	12/11/1995	NA	NA	NA	NA
	3/15/1996	*15*	NA	NA	NA
	6/27/1996	NA	NA	NA	NA
	9/5/1996	6.4	NA	NA	NA
	12/3/1996	NA	NA	NA	NA
	4/26/1997	*11*	NA	NA	NA
	4/30/1998	*60*	NA	NA	NA
	10/22/1998	7	NA	NA	NA
	4/16/1999	*12*	NA	NA	NA
	10/19/1999	9.3	NA	NA	NA
	4/17/2000	*22*	NA	NA	NA
	4/6/2001	<11	NA	NA	NA
	4/18/2002	<11	NA	NA	NA
	4/16/2003	2.9	NA	NA	NA
	4/19/2004	2.8	<2.0	NA	NA
	4/11/2005	*82*	16	NA	NA
	7/18/2005	<30	<2	NA	NA
	4/11/2006	1.7	<2.0	NA	NA
	4/29/2007	4	<2.0	NA	NA
	4/23/2008	4.4	<2.0	NA	NA
	4/7/2009	4.6	<0.1	NA	NA
	4/13/2010	*26*	<3.0	NA	NA
	4/27/2011	3	<3	NA	NA
	4/10/2012	1.7	<3	NA	NA
	4/15/2013	2.6	<2.6	NA	NA
	4/9/2014	4.2	<3.0	NA	NA
	4/21/2015	0.5	<0.5	NA	NA
	4/14/2016	0.35	<2	NA	NA
	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/29/2021	4.0 J	NA	NA	NA
MW-1B	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/29/2021	<1.7	NA	NA	NA
MW-2	2/9/1987	*70*	70	NA	NA
	7/29/1987	<40	NA	NA	NA
	9/25/1987	**100**	NA	NA	NA
	12/11/1987	**100**	NA	NA	NA
	3/21/1988	*85*	NA	NA	NA
	6/13/1988	**140**	NA	NA	NA
	9/8/1988	*71*	NA	NA	NA
	12/15/1988	**130**	NA	NA	NA
	3/26/1992	<40	NA	NA	NA
	6/16/1992	*17*	NA	NA	NA
	9/4/1992	<40	NA	NA	NA
	12/17/1992	NA	NA	NA	NA
	3/25/1993	<80	NA	NA	NA
	6/22/1993	NA	NA	NA	NA
	9/16/1993	<80	NA	NA	NA
	12/3/1993	NA	NA	NA	NA
	3/15/1994	<70	NA	NA	NA
	6/16/1994	NA	NA	NA	NA
	9/20/1994	*19*	NA	NA	NA
	12/13/1994	NA	NA	NA	NA
	3/31/1995	*19*	NA	NA	NA
	6/15/1995	NA	NA	NA	NA
	9/7/1995	*14*	NA	NA	NA
	12/11/1995	NA	NA	NA	NA
	3/15/1996	*11*	NA	NA	NA
	6/27/1996	NA	NA	NA	NA
	9/5/1996	*29*	NA	NA	NA
	12/3/1996	NA	NA	NA	NA
	4/26/1997	9.2	NA	NA	NA

TABLE A.1.b

GROUNDWATER ANALYTICAL - METALS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Dissolved Chromium	Dissolved Hexavalent Chromium	Dissolved Manganese	Dissolved Iron
Public Health Enforcement Standard		**100**	**NE**	**300**	**300***
Public Health Preventive Action Limit		*10*	*NE*	*60*	*150**
MW-2 (continued)	10/29/1997	*10*	NA	NA	NA
	4/30/1998	*11*	NA	NA	NA
	10/22/1998	9.3	NA	NA	NA
	4/16/1999	7.7	NA	NA	NA
	10/19/1999	6.8	NA	NA	NA
	4/17/2000	*22*	NA	NA	NA
	4/6/2001	<11	NA	NA	NA
	4/18/2002	<11	NA	NA	NA
	4/16/2003	<1.1	NA	NA	NA
	4/19/2004	1.0	<2.0	NA	NA
	4/11/2005	1.3	<2.0	NA	NA
	4/11/2006	0.4	<2.0	NA	NA
	4/29/2007	1.5	<2.0	NA	NA
	4/23/2008	2.4	<2.0	NA	NA
	4/7/2009	8.3	<.1	NA	NA
	4/13/2010	5	<3.0	NA	NA
	4/27/2011	3	<3.0	NA	NA
	4/10/2012	0.7	<3.0	NA	NA
	4/15/2013	0.4	<.4	NA	NA
	4/9/2014	0.6	<0.6	NA	NA
	4/21/2015	0.94	<0.94	NA	NA
	4/14/2016	4.9	<2	NA	NA
	6/29/2017	*29.5*	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	7/1/2020	<3.9	NA	14.8	100
	7/8/2021	<3.9	NA	<4.2	<30
	12/29/2021	6.0 J	NA	14 J	96
MW-2A	3/26/1992	<40	NA	NA	NA
	6/16/1992	1.5	NA	NA	NA
	9/4/1992	<40	NA	NA	NA
	12/17/1992	NA	NA	NA	NA
	3/25/1993	<80	NA	NA	NA
	6/22/1993	NA	NA	NA	NA
	9/16/1993	<80	NA	NA	NA
	12/3/1993	NA	NA	NA	NA
	3/15/1994	<70	NA	NA	NA
	6/16/1994	NA	NA	NA	NA
	9/20/1994	*14*	NA	NA	NA
	12/13/1994	NA	NA	NA	NA
	3/31/1995	*17*	NA	NA	NA
	6/15/1995	NA	NA	NA	NA
	9/7/1995	3.9	NA	NA	NA
	12/11/1995	NA	NA	NA	NA
	3/15/1996	3.6	NA	NA	NA
	6/27/1996	NA	NA	NA	NA
	9/5/1996	1.2	NA	NA	NA
	12/3/1996	NA	NA	NA	NA
	4/26/1997	0.3	NA	NA	NA
	4/30/1998	2.5	NA	NA	NA
	4/16/1999	2.4	NA	NA	NA
	4/17/2000	*23*	NA	NA	NA
	4/6/2001	<11	NA	NA	NA
	4/18/2002	<11	NA	NA	NA
	4/16/2003	<1.1	NA	NA	NA
	4/19/2004	0.6	<2.0	NA	NA
	4/11/2005	0.4	<2.0	NA	NA
	4/11/2006	<0.2	<2.0	NA	NA
	4/29/2007	0.7	<2.0	NA	NA
	4/23/2008	<0.4	<2.0	NA	NA
	4/7/2009	1.5	<0.1	NA	NA
	4/13/2010	5	<3.0	NA	NA
	4/27/2011	2	<3.0	NA	NA
	4/10/2012	0.5	<3.0	NA	NA
	4/15/2013	<0.2	<0.2	NA	NA
	4/9/2014	0.4	<0.4	NA	NA
	4/21/2015	0.11	<0.11	NA	NA
	4/14/2016	0.56	<2	NA	NA
	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/29/2021	2.0 J	NA	NA	NA

TABLE A.1.b

GROUNDWATER ANALYTICAL - METALS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Dissolved Chromium	Dissolved Hexavalent Chromium	Dissolved Manganese	Dissolved Iron
Public Health Enforcement Standard		**100**	**NE**	**300**	**300***
Public Health Preventive Action Limit		*10*	*NE*	*60*	*150**
MW-5	3/26/1992	**33,000**	NA	NA	NA
	6/16/1992	**27,000**	NA	NA	NA
	9/4/1992	**33,000**	NA	NA	NA
	12/17/1992	**28,000**	NA	NA	NA
	3/25/1993	**29,000**	NA	NA	NA
	6/22/1993	**24,000**	NA	NA	NA
	9/16/1993	**25,000**	NA	NA	NA
	12/3/1993	**26,000**	NA	NA	NA
	3/15/1994	**26,000**	NA	NA	NA
	6/16/1994	**2,013**	NA	NA	NA
	9/20/1994	**29,000**	NA	NA	NA
	12/13/1994	**19,000**	NA	NA	NA
	3/31/1995	**19,960**	NA	NA	NA
	6/15/1995	**21,190**	NA	NA	NA
	9/7/1995	**25,400**	NA	NA	NA
	12/11/1995	**18,000**	NA	NA	NA
	3/15/1996	**15,830**	NA	NA	NA
	6/27/1996	**18,000**	NA	NA	NA
	9/5/1996	**14,000**	NA	NA	NA
	12/3/1996	**24,000**	NA	NA	NA
	1/23/1997	**22,000**	NA	NA	NA
	4/26/1997	**17,000**	NA	NA	NA
	7/16/1997	**20,000**	NA	NA	NA
	10/29/1997	**1,600**	NA	NA	NA
	1/20/1998	**18,000**	NA	NA	NA
	4/30/1998	**15,000**	NA	NA	NA
	7/10/1998	**18,000**	NA	NA	NA
	10/22/1998	**21,000**	NA	NA	NA
	1/19/1999	**14,000**	NA	NA	NA
	4/16/1999	**15,000**	NA	NA	NA
	7/23/1999	**14,000**	NA	NA	NA
	10/19/1999	**18,175**	NA	NA	NA
	1/10/2000	**12,000**	NA	NA	NA
	4/17/2000	**8,500**	NA	NA	NA
	7/20/2000	**11,000**	NA	NA	NA
	10/25/2000	**8,500**	NA	NA	NA
	1/17/2001	**14,000**	NA	NA	NA
	4/6/2001	**7,900**	NA	NA	NA
	7/20/2001	**10,000**	NA	NA	NA
	10/16/2001	**12,000**	NA	NA	NA
	1/14/2002	**11,000**	NA	NA	NA
	4/18/2002	**5,500**	NA	NA	NA
	7/23/2002	**788**	NA	NA	NA
	10/30/2002	**1,500**	NA	NA	NA
	1/20/2003	**19,000**	NA	NA	NA
	4/16/2003	**7,000**	NA	NA	NA
	7/10/2003	*33*	NA	NA	NA
	10/7/2003	**3,300**	NA	NA	NA
	1/30/2004	**1,200**	NA	NA	NA
	4/19/2004	**7,900**	10,000	NA	NA
	7/26/2004	**6,700**	6,300	NA	NA
	10/11/2004	**6,500**	6,500	NA	NA
	1/12/2005	**6,460**	6,300	NA	NA
	4/11/2005	**5,085**	4,500	NA	NA
	7/18/2005	**4,900**	4,900	NA	NA
	10/11/2005	**5,100**	4,900	NA	NA
	1/10/2006	**10,880**	10,000	NA	NA
	4/11/2006	**4,455**	3,880	NA	NA
	7/27/2006	**3,190**	3,400	NA	NA
	10/18/2006	**5,100**	4,500	NA	NA
	1/9/2007	**2,900**	2,800	NA	NA
	4/29/2007	**2,895**	2,500	NA	NA
	7/24/2007	**2,465**	2,465	NA	NA
	10/24/2007	**3,205**	2,700	NA	NA
	1/16/2008	**2,335**	2,300	NA	NA
	4/23/2008	**2,067**	1,700	NA	NA
	7/15/2008	**2,425**	1,700	NA	NA
	10/23/2008	**2,400**	1,800	NA	NA
	1/22/2009	**2,024**	1,900	NA	NA
	4/7/2009	**2,116**	1,700	NA	NA
	7/7/2009	**2,200**	2,000	NA	NA
	10/11/2009	**2,500**	2,300	NA	NA
	1/19/2010	**2,015**	1,900	NA	NA
	4/13/2010	**1,600**	1,400	NA	NA
	7/29/2010	**1,800**	1,300	NA	NA

TABLE A.1.b

GROUNDWATER ANALYTICAL - METALS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Dissolved Chromium	Dissolved Hexavalent Chromium	Dissolved Manganese	Dissolved Iron
Public Health Enforcement Standard		**100**	**NE**	**300**	**300***
Public Health Preventive Action Limit		*10*	*NE*	*60*	*150**
MW-5 (continued)	10/19/2010	**1,700**	1,400	NA	NA
	1/13/2011	**1,500**	1,400	NA	NA
	4/27/2011	**1,200**	1,200	NA	NA
	7/19/2011	**1,100**	1,000	NA	NA
	10/11/2011	**1,100**	1,000	NA	NA
	1/10/2012	**1,140**	950	NA	NA
	4/10/2012	**1,200**	1,100	NA	NA
	8/8/2012	**1,200**	49	NA	NA
	10/9/2012	**1,139**	1,100	NA	NA
	1/8/2013	**1,500**	1,310	NA	NA
	4/15/2013	**1,166**	1,166	NA	NA
	7/10/2013	**1,300**	1,300	NA	NA
	10/14/2013	**1,338**	1,300	NA	NA
	1/15/2014	**1,594**	1,730	NA	NA
	4/9/2014	**1,430**	1,280	NA	NA
	7/8/2014	**1,300**	1,180	NA	NA
	10/14/2014	**960**	960	NA	NA
	1/13/2015	**784**	670	NA	NA
	4/21/2015	**576**	514	NA	NA
	7/15/2015	**605**	591	NA	NA
	10/20/2015	**604**	512	NA	NA
	1/21/2016	**444**	408	NA	NA
	4/14/2016	**462**	430	NA	NA
	7/14/2016	**536**	466	NA	NA
	10/18/2016	*37*	48	NA	NA
	6/29/2017	**120**	NA	NA	NA
DUP-3	6/29/2017	**122**	NA	NA	NA
MW-5 (continued)	8/31/2017	**256**	NA	NA	NA
	4/10/2020	*12.7 J*	NA	**462**	**13,800**
	7/1/2020	<3.9	NA	**408**	**11,500**
	9/29/2020	<3.9	NA	**346**	**10,100**
	12/29/2020	<3.9	NA	**353**	**4,110**
	3/17/2021	<3.9	NA	**299**	**4,170**
	7/8/2021	<3.9	NA	**315**	**3,140**
	9/23/2021	2.99 J	NA	**313**	**3,690**
	12/28/2021	3.0 J	NA	*293*	**1,400**
DUP-1	12/28/2021	3.0 J	NA	NA	NA
MW-5A	2/9/1987	*80*	80	NA	NA
	7/29/1987	**8,000**	NA	NA	NA
	9/25/1987	**2,100**	NA	NA	NA
	12/11/1987	**14,400**	NA	NA	NA
	3/21/1988	**26,000**	NA	NA	NA
	6/13/1988	**7,800**	NA	NA	NA
	9/8/1988	**3,000**	NA	NA	NA
	12/15/1988	**7,100**	NA	NA	NA
	3/26/1992	**5,600**	NA	NA	NA
	6/16/1992	**7,600**	NA	NA	NA
	9/4/1992	**13,000**	NA	NA	NA
	12/17/1992	**1,500**	NA	NA	NA
	3/25/1993	**2,200**	NA	NA	NA
	6/22/1993	**1,400**	NA	NA	NA
	9/16/1993	**3,800**	NA	NA	NA
	12/3/1993	**10,000**	NA	NA	NA
	3/15/1994	**900**	NA	NA	NA
	6/16/1994	**312**	NA	NA	NA
	9/20/1994	**350**	NA	NA	NA
	12/13/1994	**580**	NA	NA	NA
	3/31/1995	**568**	NA	NA	NA
	6/15/1995	**228**	NA	NA	NA
	9/7/1995	**1,928**	NA	NA	NA
	12/11/1995	*24*	NA	NA	NA
	3/15/1996	**552**	NA	NA	NA
	6/27/1996	**490**	NA	NA	NA
	9/5/1996	**2,200**	NA	NA	NA
	12/3/1996	**1,600**	NA	NA	NA
	1/23/1997	**170**	NA	NA	NA
	4/26/1997	*68*	NA	NA	NA
	7/16/1997	*40*	NA	NA	NA
	10/29/1997	**140**	NA	NA	NA
	1/20/1998	**1,500**	NA	NA	NA
	4/30/1998	**130**	NA	NA	NA
	7/10/1998	**150**	NA	NA	NA
	10/22/1998	**160**	NA	NA	NA
	1/19/1999	**900**	NA	NA	NA
	4/16/1999	*99*	NA	NA	NA

TABLE A.1.b

GROUNDWATER ANALYTICAL - METALS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Dissolved Chromium	Dissolved Hexavalent Chromium	Dissolved Manganese	Dissolved Iron
Public Health Enforcement Standard		**100**	**NE**	**300**	**300***
Public Health Preventive Action Limit		*10*	*NE*	*60*	*150**
MW-5A (continued)	7/23/1999	*76*	NA	NA	NA
	10/19/1999	**104**	NA	NA	NA
	1/10/2000	**1,200**	NA	NA	NA
	4/17/2000	**880**	NA	NA	NA
	7/20/2000	**400**	NA	NA	NA
	10/25/2000	**1,100**	NA	NA	NA
	1/17/2001	**280**	NA	NA	NA
	4/6/2001	*65*	NA	NA	NA
	7/20/2001	*11*	NA	NA	NA
	10/16/2001	*16*	NA	NA	NA
	1/14/2002	*78*	NA	NA	NA
	4/18/2002	**380**	NA	NA	NA
	7/23/2002	**207**	NA	NA	NA
	10/30/2002	*45*	NA	NA	NA
	1/20/2003	**1,200**	NA	NA	NA
	4/16/2003	**270**	NA	NA	NA
	7/10/2003	**1,200**	NA	NA	NA
	10/7/2003	*16*	NA	NA	NA
	1/30/2004	*23*	NA	NA	NA
	4/19/2004	**480**	82	NA	NA
	7/26/2004	*40*	<4	NA	NA
	10/11/2004	*12*	12	NA	NA
	1/12/2005	*30*	<2	NA	NA
	4/11/2005	*13*	10	NA	NA
	7/18/2005	<30	<2	NA	NA
	10/11/2005	*26*	<2	NA	NA
	1/10/2006	3.5	<2	NA	NA
	04//11/06	*36*	<2	NA	NA
	7/27/2006	**755**	720	NA	NA
	10/18/2006	5.2	5.2	NA	NA
	1/9/2007	2.3	<2.0	NA	NA
	4/29/2007	*12*	10	NA	NA
	7/24/2007	2.4	<2.0	NA	NA
	10/24/2007	2.7	<2.0	NA	NA
	1/16/2008	*10*	<2.0	NA	NA
	4/23/2008	**167**	20	NA	NA
	7/15/2008	6.4	<1.0	NA	NA
	10/23/2008	*18*	10	NA	NA
	01/22/09	**248**	210	NA	NA
	4/7/2009	**630**	590	NA	NA
	7/7/2009	7	<4.0	NA	NA
	10/11/2009	*33*	<3.0	NA	NA
	1/19/2010	*24*	<3.0	NA	NA
	4/13/2010	7	7	NA	NA
	7/29/2010	6	<3.0	NA	NA
	10/19/2010	5	5	NA	NA
	1/13/2011	5	5	NA	NA
	4/27/2011	*27*	14	NA	NA
	7/19/2011	<3	<3	NA	NA
	10/11/2011	*11*	7	NA	NA
	1/10/2012	*94*	60	NA	NA
	4/10/2012	4.2	<3.0	NA	NA
	8/8/2012	*49*	<3.0	NA	NA
	10/9/2012	*39*	26	NA	NA
	1/8/2013	7.9	<3.0	NA	NA
	4/15/2013	3.7	<3.0	NA	NA
	7/10/2013	**1,300**	<3.0	NA	NA
	10/14/2013	*65*	67	NA	NA
	1/15/2014	*23*	21	NA	NA
	4/9/2014	*12*	7	NA	NA
	7/8/2014	4	<3	NA	NA
	10/14/2014	5	<3	NA	NA
	1/13/2015	3.1	<3	NA	NA
	4/21/2015	1.2	<1.2	NA	NA
	7/15/2015	4.6	<0.1	NA	NA
	10/20/2015	*16*	<2.0	NA	NA
	1/21/2016	7.8	<2.0	NA	NA
	4/14/2016	1.2	9	NA	NA
	7/14/2016	*12*	6	NA	NA
	10/18/2016	0.79	<2	NA	NA
	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	7/1/2020	<3.9	NA	**1,050**	**13,500**
	7/8/2021	<3.9	NA	**431**	**3,410**
	12/29/2021	2.0 J	NA	**591**	**3,940**

TABLE A.1.b

GROUNDWATER ANALYTICAL - METALS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Dissolved Chromium	Dissolved Hexavalent Chromium	Dissolved Manganese	Dissolved Iron
Public Health Enforcement Standard		**100**	**NE**	**300**	**300***
Public Health Preventive Action Limit		*10*	*NE*	*60*	*150**
MW-5C	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
MW-10R	1/19/1999	3.7	NA	NA	NA
	4/16/1999	4.4	NA	NA	NA
	7/23/1999	8.3	NA	NA	NA
	10/19/1999	1	NA	NA	NA
	1/10/2000	<11	NA	NA	NA
	4/17/2000	*13*	NA	NA	NA
	7/20/2000	*16*	NA	NA	NA
	10/25/2000	<11	NA	NA	NA
	1/17/2001	<11	NA	NA	NA
	4/6/2001	<11	NA	NA	NA
	4/18/2002	<11	NA	NA	NA
	4/30/2003	1.1	NA	NA	NA
	4/19/2004	1.2	<2.0	NA	NA
	4/11/2005	1.2	<2.0	NA	NA
	7/18/2005	<30	<2.0	NA	NA
	4/11/2006	1	<2.0	NA	NA
	4/29/2007	1.5	1.5	NA	NA
	4/23/2008	3.5	3.5	NA	NA
	4/7/2009	4.4	<0.1	NA	NA
	4/13/2010	*11*	<3.0	NA	NA
	4/27/2011	5	<3.0	NA	NA
	4/10/2012	5.5	<3.0	NA	NA
	4/15/2013	0.5	<0.5	NA	NA
	4/9/2014	0.5	<0.5	NA	NA
	4/21/2015	0.41	<0.41	NA	NA
	4/14/2016	0.31	<2	NA	NA
	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/29/2021	3.0 J	NA	NA	NA
MW-10B	6/29/2017	2.8 J	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/29/2021	2.0 J	NA	NA	NA
MW-17	3/26/1992	<40	NA	NA	NA
	6/16/1992	1.3	NA	NA	NA
	9/4/1992	<40	NA	NA	NA
	12/17/1992	NA	NA	NA	NA
	3/25/1993	<80	NA	NA	NA
	6/22/1993	NA	NA	NA	NA
	9/16/1993	<80	NA	NA	NA
	12/30/1993	NA	NA	NA	NA
	3/15/1994	<70	NA	NA	NA
	6/16/1994	NA	NA	NA	NA
	9/20/1994	*15*	NA	NA	NA
	12/13/1994	NA	NA	NA	NA
	3/31/1995	9.8	NA	NA	NA
	6/15/1995	NA	NA	NA	NA
	9/7/1995	8.1	NA	NA	NA
	12/11/1995	NA	NA	NA	NA
	3/15/1996	3.6	NA	NA	NA
	6/27/1996	NA	NA	NA	NA
	9/5/1996	2.4	NA	NA	NA
	12/3/1996	NA	NA	NA	NA
	4/26/1997	0.5	NA	NA	NA
	4/30/1998	1.7	NA	NA	NA
	4/16/1999	2.9	NA	NA	NA
	4/17/2000	<11	NA	NA	NA
	4/6/2001	<11	NA	NA	NA
	4/18/2002	<11	NA	NA	NA
	4/16/2003	<1.1	NA	NA	NA
	4/19/2004	1.7	<2.0	NA	NA
	4/11/2005	0.3	<2.0	NA	NA
	4/11/2006	1.5	<2.0	NA	NA
	4/29/2007	0.8	<2.0	NA	NA
	4/23/2008	<0.4	<2.0	NA	NA
	4/7/2009	1.7	<0.1	NA	NA
	4/13/2010	*12*	<3.0	NA	NA
	4/27/2011	2	<3.0	NA	NA
	4/10/2012	0.4	<3.0	NA	NA
	4/15/2013	<0.2	<0.2	NA	NA
	4/9/2014	0.8	<0.8	NA	NA
	4/21/2015	0.39	<0.39	NA	NA
	4/14/2016	0.68	<2	NA	NA
	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/28/2021	<1.7	NA	NA	NA

TABLE A.1.b

GROUNDWATER ANALYTICAL - METALS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Dissolved Chromium	Dissolved Hexavalent Chromium	Dissolved Manganese	Dissolved Iron
Public Health Enforcement Standard		**100**	**NE**	**300**	**300***
Public Health Preventive Action Limit		*10*	*NE*	*60*	*150**
MW-17A	3/26/1992	<40	NA	NA	NA
	6/16/1992	*26*	NA	NA	NA
	9/4/1992	<40	NA	NA	NA
	12/17/1992	NA	NA	NA	NA
	3/25/1993	<80	NA	NA	NA
	6/22/1993	NA	NA	NA	NA
	9/16/1993	<80	NA	NA	NA
	12/3/1993	NA	NA	NA	NA
	3/15/1994	<70	NA	NA	NA
	6/16/1994	NA	NA	NA	NA
	9/20/1994	*22*	NA	NA	NA
	12/13/1994	NA	NA	NA	NA
	3/31/1995	*14*	NA	NA	NA
	6/15/1995	NA	NA	NA	NA
	9/7/1995	6.4	NA	NA	NA
	12/11/1995	NA	NA	NA	NA
	3/15/1996	3.4	NA	NA	NA
	6/27/1996	NA	NA	NA	NA
	9/5/1996	0.7	NA	NA	NA
	12/3/1996	NA	NA	NA	NA
	4/26/1997	<0.2	NA	NA	NA
	4/30/1998	1.5	NA	NA	NA
	4/16/1999	0.9	NA	NA	NA
	4/17/2000	<11	NA	NA	NA
	4/6/2001	<11	NA	NA	NA
	4/18/2002	<11	NA	NA	NA
	4/16/2003	<1.1	NA	NA	NA
	4/19/2004	0.2	<2.0	NA	NA
	4/11/2005	0.3	<2.0	NA	NA
	4/11/2006	<0.2	<2.0	NA	NA
	4/29/2007	0.2	<2.0	NA	NA
	4/23/2008	<0.4	<2.0	NA	NA
	4/7/2009	0.3	<0.1	NA	NA
	4/13/2010	0.9	<3.0	NA	NA
	4/27/2011	3	<3.0	NA	NA
	4/10/2012	0.5	<3.0	NA	NA
	4/15/2013	<0.2	<0.2	NA	NA
	4/9/2014	<0.2	<0.2	NA	NA
	4/21/2015	0.17	<0.17	NA	NA
	4/14/2016	<0.2	<2	NA	NA
	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/28/2021	<1.7	NA	NA	NA
MW-18	8/13/2002	<12	NA	NA	NA
	4/16/2003	<1.1	NA	NA	NA
	4/19/2004	<0.2	<2.0	NA	NA
	4/11/2005	<0.2	<2.0	NA	NA
	4/11/2006	<0.2	<2.0	NA	NA
	4/29/2007	0.3	<2.0	NA	NA
	4/23/2008	1.1	<4.0	NA	NA
	4/7/2009	3.8	<0.1	NA	NA
	4/13/2010	6.9	<3.0	NA	NA
	4/27/2011	0.4	<3.0	NA	NA
	4/10/2012	0.2	<3.0	NA	NA
	4/15/2013	<0.2	<0.2	NA	NA
	4/9/2014	0.4	<0.4	NA	NA
	4/21/2015	<0.1	<0.1	NA	NA
	4/14/2016	1.6	<2	NA	NA
	6/29/2017	3.5 J	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/28/2021	<1.7	NA	NA	NA
MW-18A	8/13/2002	<12	NA	NA	NA
	4/16/2003	<1.1	NA	NA	NA
	4/19/2004	<0.2	<2.0	NA	NA
	4/11/2005	0.4	<2.0	NA	NA
	4/11/2006	1.5	<2.0	NA	NA
	4/29/2007	0.3	<2.0	NA	NA
	4/23/2008	1.1	<4.0	NA	NA
	4/7/2009	3.8	<2.0	NA	NA
	4/13/2010	6.9	<3.0	NA	NA
	4/27/2011	0.4	<3.0	NA	NA
	4/10/2012	0.2	<3.0	NA	NA
	4/15/2013	<0.2	<0.2	NA	NA
	4/9/2014	3.3	<3.0	NA	NA
	4/21/2015	*15*	<3.0	NA	NA
	4/14/2016	<0.2	2	NA	NA
	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/28/2021	3.0 J	NA	NA	NA

TABLE A.1.b

GROUNDWATER ANALYTICAL - METALS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Dissolved Chromium	Dissolved Hexavalent Chromium	Dissolved Manganese	Dissolved Iron
Public Health Enforcement Standard		**100**	**NE**	**300**	**300***
Public Health Preventive Action Limit		*10*	*NE*	*60*	*150**
MW-19	7/13/2009	**13,000**	15,000	NA	NA
	7/28/2009	**22,000**	20,000	NA	NA
	10/11/2009	**5,300**	4,000	NA	NA
	1/19/2010	**3,030**	2,600	NA	NA
	4/13/2010	**5,270**	5,270	NA	NA
	7/29/2010	**6,400**	3,900	NA	NA
	10/19/2010	**7,100**	4,800	NA	NA
	1/13/2011	**7,100**	7,100	NA	NA
	4/27/2011	**15,000**	15,000	NA	NA
	7/19/2011	**9,400**	8,700	NA	NA
	10/11/2011	**21,000**	17,000	NA	NA
	1/10/2012	**41,100**	40,000	NA	NA
	4/10/2012	**21,672**	23,000	NA	NA
	8/8/2012	**26,000**	26,000	NA	NA
	10/9/2012	**14,187**	13,000	NA	NA
	1/8/2013	**12,575**	11,000	NA	NA
	4/15/2013	**16,300**	16,300	NA	NA
	7/10/2013	**19,000**	19,000	NA	NA
	10/14/2013	**15,440**	16,000	NA	NA
	4/9/2014	**20,005**	20,005	NA	NA
	7/8/2014	**18,000**	17,000	NA	NA
	10/14/2014	**21,600**	21,300	NA	NA
	1/13/2015	**18,050**	15,000	NA	NA
	4/21/2015	**18,587**	18,000	NA	NA
	7/15/2015	**17,200**	16,000	NA	NA
	10/20/2015	**18,000**	18,000	NA	NA
	1/21/2016	**15,295**	17,000	NA	NA
	4/14/2016	**18,420**	18,100	NA	NA
	7/14/2016	**16,227**	17,600	NA	NA
	10/18/2016	**18,618**	17,100	NA	NA
	6/29/2017	**23,600**	25,000	NA	NA
	8/31/2017	**13,600**	NA	NA	NA
	4/23/2018	**18,900**	20,200	<11.3	<155
	7/16/2018	**172**	<1,300	**948**	**22,400**
	8/20/2018	*97.6*	NA	**1,640**	**88,200**
	1/21/2019	*16.1*	NA	**608**	**1,220**
MW-19R	4/10/2020	<3.9	NA	59.4	**6,870**
	6/30/2020	<3.9	NA	*111*	**8,880**
	9/29/2020	<3.9	NA	40.6	**2,930**
	12/29/2020	<3.9	NA	32.1	120
	3/17/2021	<3.9	NA	19.2	**670 J**
	7/7/2021	<3.9	NA	28.5	**1,400**
	9/23/2021	2.49 J	NA	57.5	**2,080**
	12/28/2021	4.0 J	NA	9.0 J	**318**
MW-19A	7/13/2009	*30*	50	NA	NA
	7/28/2009	*40*	40	NA	NA
	10/11/2009	3	<3.0	NA	NA
	1/19/2010	4.3	<3.0	NA	NA
	4/13/2010	8.2	<3.0	NA	NA
	7/29/2010	3	<3.0	NA	NA
	10/19/2010	1	<3.0	NA	NA
	1/13/2011	1	1	NA	NA
	4/27/2011	3	3	NA	NA
	7/19/2011	**143**	<3	NA	NA
	10/11/2011	4	4	NA	NA
	1/10/2012	4	<3.0	NA	NA
	4/10/2012	1.8	<3.0	NA	NA
	8/8/2012	**6,100**	5,400	NA	NA
	10/9/2012	*22*	40	NA	NA
	1/8/2013	8.1	<3.0	NA	NA
	4/15/2013	**500**	<3.0	NA	NA
	4/9/2014	1.8	<1.8	NA	NA
	7/8/2014	3.8	<3	NA	NA
	10/14/2014	4	<3	NA	NA
	1/13/2015	**321**	<3	NA	NA
	4/21/2015	1.5	<1.5	NA	NA
	7/15/2015	*97*	<2.0	NA	NA
	10/20/2015	1.7	<2.0	NA	NA
	1/21/2016	**121**	<2.0	NA	NA
	4/14/2016	**233**	<2.0	NA	NA
	7/14/2016	1	2	NA	NA
	10/18/2016	3.5	<2	NA	NA
	6/29/2017	8.1 J	<3.9	17.8	29.0 J
	8/31/2017	3.7 J	NA	NA	NA
	4/23/2018	<2.5	10	26.2	<15.5
MW-19AR	7/1/2020	<3.9	NA	28.9	130
	7/7/2021	<3.9	NA	52.2	**1,380**
	12/28/2021	<1.7	NA	35.0	**786**

TABLE A.1.b

GROUNDWATER ANALYTICAL - METALS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Dissolved Chromium	Dissolved Hexavalent Chromium	Dissolved Manganese	Dissolved Iron
Public Health Enforcement Standard		**100**	**NE**	**300**	**300***
Public Health Preventive Action Limit		*10*	*NE*	*60*	*150**
MW-19C	6/29/2017	<2.5	<3.9	NA	NA
	8/31/2017	<2.5	NA	NA	NA
MW-20	6/2/2014	**338,000**	338,000	NA	NA
	7/8/2014	**283,000**	89,000	NA	NA
	10/14/2014	**330,000**	297,000	NA	NA
	1/13/2015	**199,000**	155,000	NA	NA
	4/21/2015	**248,900**	248,900	NA	NA
	7/15/2015	**248,150**	247,000	NA	NA
	10/20/2015	**385,000**	385,000	NA	NA
	1/21/2016	**212,000**	234,000	NA	NA
	4/14/2016	**412,750**	279,000	NA	NA
	7/14/2016	**287,875**	326,000	NA	NA
	10/18/2016	**269,075**	283,000	NA	NA
	6/28/2017	**265,000**	273,000	NA	NA
	8/31/2017	**331,000**	NA	NA	NA
	4/23/2018	**296,000**	325,000	<11.3	<155
	7/16/2018	**161,000**	166,000	*99.1*	**929 J**
	8/20/2018	**174,000**	NA	*73.1*	*156*
	1/21/2019	**179,000**	NA	37.1	<35.4
MW-20R	4/10/2020	7.0 J	NA	*114*	**9,250**
	6/30/2020	*10.9*	NA	*166*	**23,000**
	9/29/2020	*16.7*	NA	*178*	**17,800**
DUP-1	9/29/2020	*22.8*	NA	*179*	**17,200**
MW-20R	12/29/2020	<3.9	NA	*160*	**1,950**
	3/17/2021	**145**	NA	**328**	**23,100**
	7/7/2021	4.9 J	NA	*130*	**10,700**
	9/23/2021	*14.6*	NA	*186*	**13,500**
	12/28/2021	5.1 J	NA	*220*	**14,500**
MW-20A	6/2/2014	**1,200**	1,060	NA	NA
	7/8/2014	**230**	15	NA	NA
	10/14/2014	**117**	<3	NA	NA
	1/13/2015	*11*	<3	NA	NA
	4/21/2015	1.1	<1.1	NA	NA
	7/15/2015	**192**	<2.0	NA	NA
	10/20/2015	*23*	<2.0	NA	NA
	1/21/2016	5.4	<2.0	NA	NA
	4/14/2016	*66*	8	NA	NA
	7/14/2016	5.3	4	NA	NA
	10/18/2016	**140**	<19	NA	NA
	6/28/2017	6.5 J	<3.9	*78.6*	**2,060**
	8/31/2017	4.3 J	NA	NA	NA
	4/23/2018	<2.5	140	24.5	<15.5
MW-20AR	7/1/2020	<3.9	NA	51.4	**430**
	7/7/2021	<3.9	NA	34.4	**510**
	12/28/2021	<1.7	NA	35 J	**815**
MW-20C	6/28/2017	*10.0*	<19	NA	NA
	8/31/2017	<2.5	NA	NA	NA
MW-21	6/2/2014	2.6	<30	NA	NA
	7/8/2014	**210**	<3	NA	NA
	10/14/2014	<0.1	<3	NA	NA
	1/13/2015	0.63	<3	NA	NA
	4/21/2015	5.9	<3.0	NA	NA
	7/15/2015	2.6	<2.0	NA	NA
	10/20/2015	1.7	<2.0	NA	NA
	1/21/2016	0.89	<2.0	NA	NA
	4/14/2016	2.2	<2.0	NA	NA
	7/14/2016	0.62	4	NA	NA
	10/18/2016	0.29	<19	NA	NA
	6/28/2017	*16.1*	<3.9	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/28/2021	5.0 J	NA	NA	NA
MW-21A	6/2/2014	1.8	<30	NA	NA
	7/8/2014	1.1	<3	NA	NA
	10/14/2014	<0.1	<3	NA	NA
	1/13/2015	<0.1	<3	NA	NA
	4/21/2015	0.054	<0.54	NA	NA
	7/15/2015	0.1	<2.0	NA	NA
	10/20/2015	0.51	<2.0	NA	NA
	1/21/2016	0.21	<2	NA	NA
	4/14/2016	0.6	<2.0	NA	NA
	7/14/2016	<0.2	8	NA	NA
	10/18/2016	<0.2	<19	NA	NA
	6/28/2017	6.1 J	<3.9	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/28/2021	5.0 J	NA	NA	NA
MW-22	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/28/2021	3.0 J	NA	NA	NA

TABLE A.1.b

GROUNDWATER ANALYTICAL - METALS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Dissolved Chromium	Dissolved Hexavalent Chromium	Dissolved Manganese	Dissolved Iron
Public Health Enforcement Standard		**100**	**NE**	**300**	**300***
Public Health Preventive Action Limit		*10*	*NE*	*60*	*150**
MW-22A	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/28/2021	2.0 J	NA	NA	NA
MW-23	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/29/2021	<1.7	NA	NA	NA
MW-23A	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/29/2021	<1.7	NA	NA	NA
MW-24	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	2.6 J	NA	NA	NA
	12/29/2021	4.0 J	NA	NA	NA
MW-24A	6/29/2017	<2.5	NA	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/29/2021	2.0 J	NA	NA	NA
MW-25	6/28/2017	<2.5	<3.9	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	7/1/2020	<3.9	NA	*139*	**680**
	7/7/2021	<3.9	NA	*188*	**2,280**
	12/28/2021	<1.7	NA	*224*	**2,500**
MW-25A	6/28/2017	<2.5	<3.9	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	12/28/2021	2.0 J	NA	NA	NA
MW-26	6/28/2017	**72,900**	82,500	NA	NA
DUP-1	6/28/2017	**72,800**	88,000	NA	NA
MW-26	8/31/2017	**84,900**	NA	NA	NA
	7/16/2018	**21,600**	17,600	*115*	**3,550**
	8/20/2018	**17,100**	NA	<15.5	16
	1/21/2019	**26,700**	NA	1.5 J	<35.4
MW-26R	4/10/2020	<3.9	NA	17.9	*220*
	7/1/2020	<3.9	NA	*39.3*	110
	9/29/2020	<3.9	NA	*98*	**910**
	12/29/2020	<3.9	NA	*87*	40 J
	3/17/2021	<3.9	NA	*95*	**600**
DUP-1	3/17/2021	<3.9	NA	16.3	**1,130**
MW-26R	7/7/2021	<3.9	NA	*173*	**2,690**
	9/23/2021	<1.4	NA	*104*	**665**
	12/28/2021	<1.7	NA	*259*	**1,630**
MW-26A	6/28/2017	7.9 J	<3.9	NA	NA
	8/31/2017	<2.5	NA	NA	NA
MW-27	6/28/2017	**7,350**	8,500	NA	NA
DUP-2	6/28/2017	**7,080**	8,800	NA	NA
MW-27	8/31/2017	**6,490**	NA	NA	NA
MW-27B	6/28/2017	*13.9*	7.4 J	NA	NA
	8/31/2017	<2.5	NA	NA	NA
MW-28	6/28/2017	**3,890**	3,200	43.2	53.6 J
	8/31/2017	**390**	NA	NA	NA
MW-28R	4/10/2020	<3.9	NA	*68*	**680 J**
	6/30/2020	<3.9	NA	*206*	**20,800**
	9/29/2020	<3.9	NA	<4.2	90 J
	12/29/2020	<3.9	NA	*63*	<30
	3/17/2021	<3.9	NA	*82*	**2,510**
	7/7/2021	<3.9	NA	*123*	**4,700**
	9/23/2021	<1.4	NA	*155*	**5,940**
	12/28/2021	<1.7	NA	*78*	**1,900**
MW-28A	6/28/2017	8.4 J	4.6 J	NA	NA
	8/31/2017	<2.5	NA	NA	NA
MW-29	6/29/2017	**951**	1,000	NA	NA
DUP-4	6/29/2017	**947**	NA	NA	NA
MW-29	8/31/2017	**228**	NA	NA	NA
	7/16/2018	**220**	250	13.1	89.6 J
	8/20/2018	**380**	NA	NA	NA
	1/21/2019	**376**	NA	<1.1	<35.4
MW-29A	6/29/2017	<2.5	<3.9	NA	NA
	8/31/2017	<2.5	NA	NA	NA
MW-30	6/28/2017	**3,980**	4,000	NA	NA
	8/31/2017	**3,540**	NA	NA	NA
MW-30R	4/10/2020	<3.9	NA	20.1	**900**
	7/2/2020	<3.9	NA	<4.2	80 J
	9/29/2020	<3.9	NA	52.2	**2,240**
	12/29/2020	<3.9	NA	<4.2	70 J
	3/17/2021	<3.9	NA	23.9	*270*
	7/7/2021	<3.9	NA	<4.2	50 J
	9/23/2021	<1.4	NA	<0.934	23.2 J
	12/28/2021	<1.7	NA	0.69 J	51
MW-30A	6/28/2017	2.7 J	<19	NA	NA
	8/31/2017	<2.5	NA	NA	NA
	7/2/2020	<3.9	NA	NA	NA

TABLE A.1.b

GROUNDWATER ANALYTICAL - METALS

Former Appleton Wire

Monitoring Well Identification	Sample Date	Dissolved Chromium	Dissolved Hexavalent Chromium	Dissolved Manganese	Dissolved Iron
Public Health Enforcement Standard		**100**	**NE**	**300**	**300***
Public Health Preventive Action Limit		*10*	*NE*	*60*	*150**
MW-31	7/2/2020	<3.9	NA	**615**	**26,400**
	7/7/2021	<3.9	NA	**366**	**26,900**
	12/29/2021	*12 J*	NA	35 J	**2,070**
MW-31A	7/2/2020	<3.9	NA	**7,310**	**217,000**
	7/7/2021	<3.9	NA	12.1 J	**430**
	12/29/2021	7.0 J	NA	**1,620**	**44,500**
MW-32	7/2/2020	<3.9	NA	*60*	60 J
	7/7/2021	<3.9	NA	12.6 J	110
	12/29/2021	9.0 J	NA	49 J	**1,040**
MW-32A	7/2/2020	<3.9	NA	38.3	*160*
	7/7/2021	<3.9	NA	*65.2*	**1,060**
UB-1	6/19/2017	3.5 J	NA	NA	NA
UB-2	6/19/2017	<2.5	NA	NA	NA
OW-1	04/23/18	**200,000**	207,000	NA	NA
	07/16/18	*84.6*	<130	NA	NA
	08/20/18	*16.6*	NA	NA	NA
OW-2	04/23/18	**25,800**	27,200	NA	NA
	07/16/18	*17.0*	<260	NA	NA
	08/20/18	5.9 J	NA	NA	NA
OW-3	04/23/18	**1,050**	1,100	NA	NA
	07/16/18	**505**	330	NA	NA
	08/20/18	*13.8*	NA	NA	NA
TW-1	7/16/2018	<2.5	NA	NA	NA
TW-2	7/16/2018	<2.5	NA	NA	NA
TW-3	7/16/2018	<2.5	NA	NA	NA
TW-4	7/16/2018	**196**	NA	NA	NA
	8/20/2018	<2.5	NA	NA	NA
	8/20/2018 [1]	<3.9	NA	NA	NA
TW-5	7/16/2018	3.2 J	NA	NA	NA
TW-6	7/16/2018	<2.5	NA	NA	NA

Notes:

All concentrations reported in units of micrograms per liter (µg/L)

Bolded values indicates an exceedance of the Public Health Enforcement Standard

Italicized values indicates an exceedance the Public Health Preventive Action Limit

* Public Welfare Standard

J = Analyte concentration detected between the laboratory Reporting Limit and the laboratory Method Detection Limit

NE = Not Established

NA = Not Analyzed

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2984 Shawano Avenue
Green Bay WI 54313-6727

Tony Evers, Governor
Preston D. Cole, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

November 30, 2022

Wood Brown LLC
ATTN: Jamie DeBruin
P.O. Box 483
Kaukauna, WI 54130
Via Electronic Mail Only to jdebruin1@gmail.com

KEEP THIS LEGAL DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Continuing Obligations and Property Owner Requirements for 714 E. Hancock Street
Parcel Identification Number: 31-1-1139-00
Final Case Closure for Appleton Wire (Former), 908 N. Lawe Street, Appleton, Wisconsin
BRRTS #: 02-45-000015, FID #: 445035910

Dear Mr. DeBruin:

The purpose of this letter is to notify you that you are responsible for certain continuing obligations applied to your property at 714 E. Hancock Street, Appleton, Wisconsin, parcel ID number 31-1-1139-00 (Property) due to contamination remaining on the Property. The continuing obligations are part of the cleanup and case closure approved by the Wisconsin Department of Natural Resources (DNR) for the Appleton Wire (Former) site, located at 908 N. Lawe Street, Appleton, Wisconsin (Site). The Site is referenced by the location of the source of contamination, i.e., the property where the original hazardous substance discharge or environmental pollution occurred, prior to contamination migrating to the Property. The continuing obligations that apply to the Property are included in this letter and are stated as conditions in the closure approval letter and are consistent with Wisconsin Statute (Wis. Stat.) § 292.12 and Wisconsin Administrative Code (Wis. Admin. Code) chs. NR 700-799. Continuing obligations are intended to limit exposure to remaining environmental contamination at the Property. These continuing obligations will also apply to future owners of the Property, until the conditions no longer exist.

It is common for properties to have continuing obligations as part of case closure approvals when contamination remains in the environment for a specific reason. Information on the continuing obligations associated with this Site, including the case closure approval letter, is available in the DNR's Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW) at dnr.wi.gov, search "BOTW." Enter 02-45-000015 in the **Activity Number** field and then click **Search**. Scroll down and click on the **CO Packet** link for information about the completion of the environmental work. The Site may also be seen on the map viewer, RR Sites Map. RR Sites Map can be found online at dnr.wi.gov, search "RRSM."

The DNR reviewed and approved the case closure request regarding the metals and chlorinated volatile organic compounds (CVOCs) contamination in soil and groundwater at this Site, based on information submitted by EnviroForensics LLC. As required by state law, you received notification about the requested case closure from the person conducting the cleanup on May 5, 2022. No further investigation or cleanup is required at this time. However, the case closure decision is conditioned upon long-term compliance with the continuing obligations at the Property.

Continuing Obligations Applicable to the Property
Continuing obligations associated with the Site are described in the attached case closure letter to Albany International Corp. and Luvata Appleton LLC, dated November 30, 2022. However, only the following continuing obligations apply to the Property.

SUMMARY OF CONTINUING OBLIGATIONS

ADDRESS (Appleton, WI)	COS APPLIED	DATE OF MAINTENANCE PLAN(S)
714 E. Hancock Street	• Residual Soil Contamination • Cover for Soil (Maintenance Required) • Residual Groundwater Contamination	May 2, 2022

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 Property, as indicated on the enclosed map (Figure B.2.b.2, Residual Soil Contamination – Hexavalent Chromium, April 4, 2022). 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 existing ground surface consisting of concrete, gravel, and green space located north of the asphalt parking lot, 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 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

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 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 are present on the Property as shown on the enclosed map (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 monitoring wells MW-1, MW-1B, MW-2, MW-2A, MW-5, MW-5A, MW-18, and MW-18A that remain on the Property are being retained by Albany International Corporation and Luvata Appleton LLC for continued monitoring for another site undergoing environmental cleanup, Appleton Wire (Former) – Site 2 BRRTS # 02-45-587658. 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.

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(s). 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 is 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 continuing obligations. 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, 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 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

Property Owner Responsibilities (Wis. Stat. § 292.12 & § 709.02, Wis. Admin. Code § NR 727.05)
The Property owner (you and any subsequent Property owner) is responsible for compliance with the continuing obligations in this letter, pursuant to Wis. Stat. § 292.12. You are required to notify anyone who purchases the Property from you of the responsibility to comply with the continuing obligations in this letter, in accordance with Wis. Admin. Code § NR 727.05 (2).

If you lease or rent the Property to an occupant who will be responsible for maintaining a continuing obligation, you must include that responsibility in a lease agreement, in accordance with Wis. Admin. Code § NR 727.05 (3).

Please be aware that failure to comply with the continuing obligations may result in enforcement action by the DNR. The DNR intends to conduct periodic inspections to ensure that the conditions included in this letter, including compliance with referenced maintenance plans, are met.

DNR Notification (Wis. Admin. Code §§ NR 727.07, NR 726.15 (2))
The Property owner is required to notify the DNR at least 45 days before taking the following actions. The DNR may require additional investigation and/or cleanup actions if necessary to be protective of human health and the environment:

- Before removing a cover or any portion of a cover;

Send written notifications and inspection logs to the DNR using the RR Program Submittal Portal at 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 or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search "RR contacts" and select the EPA tab (https://dnr.wi.gov/topic/Brownfields/Contact.html). More information on submitting electronic documents can be

found in the DNR publication "Guidance for Electronic Submittal for the Remediation and Redevelopment Program" (RR-690), which can be found at dnr.wi.gov, search "RR-690."

The DNR fact sheet, RR-819, "Continuing Obligations for Environmental Protection" explains a property owner's responsibility for continuing obligations on their property. This fact sheet should have been sent to you when you received a notification letter before the case closure request was submitted to the DNR. You may obtain a copy at dnr.wi.gov by searching "RR-819."

Under Wis. Stat. § 292.13 owners of properties affected by contamination from another property are generally exempt from investigating or cleaning up a hazardous substance discharge that migrated onto a property from another property. However, the exemption under Wis. Stat. § 292.13 does not exempt the property owner from the responsibility to maintain a continuing obligation placed on the property in accordance with Wis. Stat. § 292.12. To maintain this exemption, that statute requires the current property owner and any subsequent property owners to meet the conditions in the statute, including:

- Granting reasonable access to the DNR, responsible party, or their contractors;
- Avoiding interference with response actions taken; and
- Avoiding actions that make the contamination worse (e.g., demolishing a structure and causing or worsening the discharges to the environment).

The DNR appreciates your cooperation 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.

Sincerely,

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

Attachments:

Figure B.2.b.2, Residual Soil Contamination – Hexavalent Chromium, April 5, 2019
Figure B.3.b.2, Groundwater Isoconcentration – Metals, April 14, 2022
Attachment D, Cap Maintenance Plan, May 2, 2022
Case Closure with Continuing Obligations letter, dated November 30, 2022

cc: Joe Gaug, Albany International Corp. (Joseph.Gaug@albint.com)
Sam Edwards, Luvata Appleton LLC (Sam.Edwards@luvata.com)
Rob Hoverman, EnviroForensics LLC (rhoverman@enviroforensics.com)
Brian Kappen, EnviroForensics LLC (bkappen@enviroforensics.com)

Legend

- Property boundary
- Underground gas utility line
- Underground water utility line
- Underground sanitary utility line
- Fiber optics line
- 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

N

20 10 0 5 10 15 20

APPROXIMATE SCALE: 1" = 20'

Russel Metals, Inc.
975 North Meade Street

Luvata Appleton LLC
908 North Lawe Street

Appvion, Inc.
714 East Hancock Street

Residential

820 Residence

814 Residence

806 Residence

802 Residence

North Meade Street

Sidewalk

Hancock Street

Gravel

Asphalt

Concrete

Concrete (Former Transformer)

Concrete (Former Air Scrubber)

Grass

Storage

GP-35 GP-33 GP-34 GP-16 GP-32 GP-31 GP-20 GP-21 GP-22 GP-30 GP-39/TW-4 GP-41/TW-6 GP-29 GP-2 GP-38/TW-3 GP-7 GP-37/TW-2 GP-15 GP-14 B-2 B-7 B-6 GP-40/TW-5 GP-36/TW-1

MW-22A MW-25A MW-21A MW-10B MW-1B

B-16 B-15 B-10/MW-10 B-9 B-4 B-5/MW-5 B-3 B-2/MW-2 B-1/MW-1

UB-4 UB-1 UB-2 UB-3

RS-11 RS-12 RS-10 RS-9 RS-8 RS-7 RS-5 RS-6 RS-1 RS-2 RS-3 RS-4

BSS-1 BSS-2 BSS-3 BSS-7 BSS-8 BSS-9 BSS-4 BSS-6 BSS-5 BSS-11 BSS-10

A B C

GP-13 GP-12

Figure	B.2.b.2
Project	6486

RESIDUAL SOIL CONTAMINATION - HEXAVALENT CHROMIUM

Former Appleton Wire
908 North Lawe Street
Appleton, Wisconsin

Date:	4/5/19
Designed:	EB
Drawn:	EB
Checked:	BK
DWG file:	6486-2681

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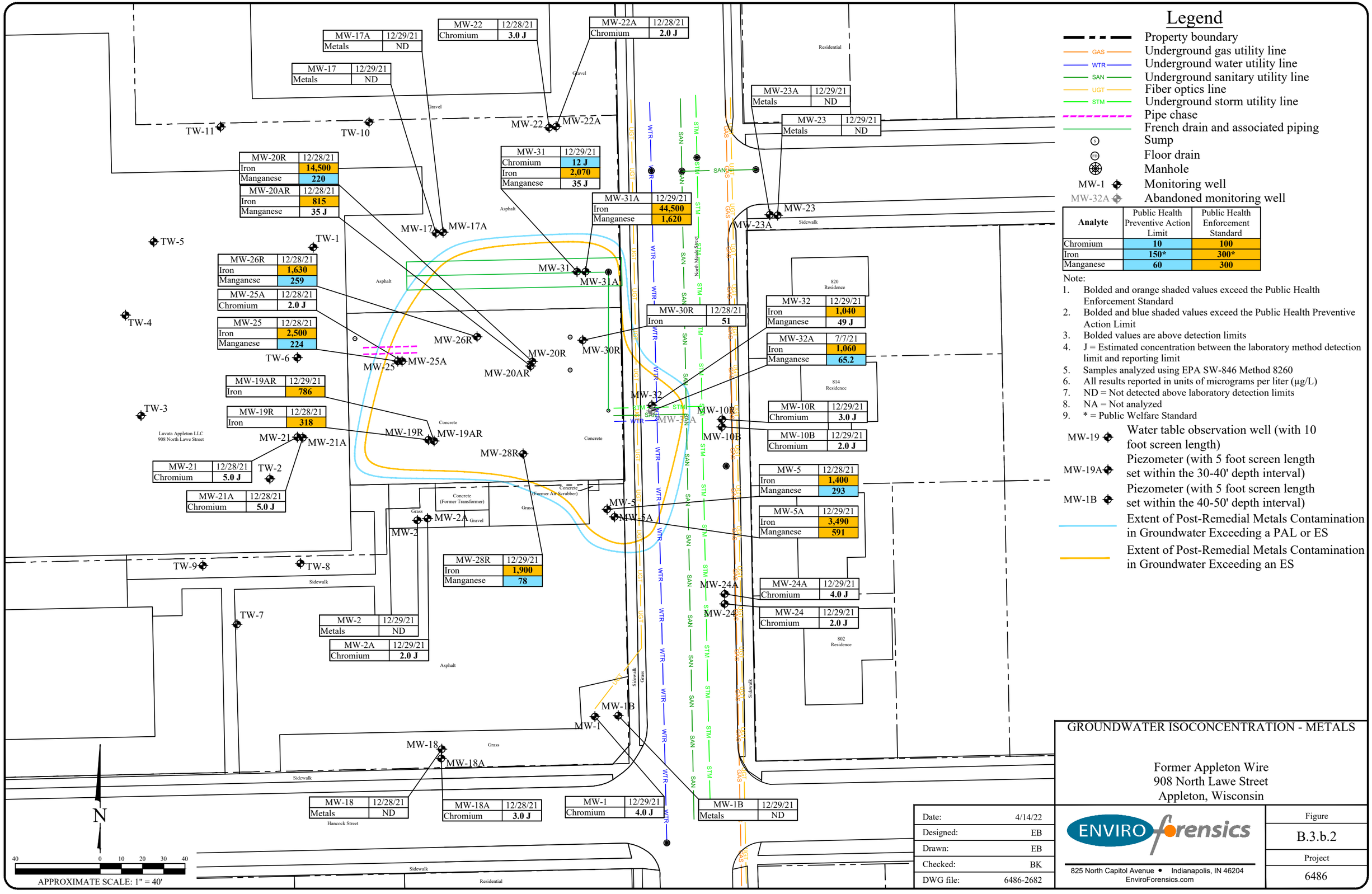
No.	Date	Revision	Approved
1	7/3/18	Updates	WF



Legend

- Property boundary
- Underground gas utility line
- Underground water utility line
- Underground sanitary utility line
- Fiber optics line
- 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:

1. Bolded and orange shaded values exceed the Public Health Enforcement Standard
2. Bolded and blue shaded values exceed the Public Health Preventive Action Limit
3. Bolded values are above detection limits
4. J = Estimated concentration between the laboratory method detection limit and reporting limit
5. Samples analyzed using EPA SW-846 Method 8260
6. All results reported in units of micrograms per liter (µg/L)
7. ND = Not detected above laboratory detection limits
8. NA = Not analyzed
9. * = 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

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Figure
B.3.b.2

Project
6486

D.1
CAP MAINTENANCE PLAN

May 2, 2022

Property identified as:

Wood Brown LLC
714 E. Hancock Street
Appleton, Wisconsin 54911

TAX ID#: 31-1-1139-00

INTRODUCTION

This document is the Maintenance Plan for the surface materials (the "Cap") covering soil contaminated with hexavalent chromium at the property located at 714 E. Hancock 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 adjacent 908 N. Lawe Street by the former Appleton Wire, which owned that facility until 1985. The maintenance activities relate to the existing surface features and materials on the Property 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 southeastern part of the building located on 908 N. Lawe Street. This part of the building borders the northern boundary of the Property and Meade

Street, and is currently used by Luvata Appleton as a warehouse. Chromic acid was released to the subsurface from spills and leaks from underground piping. Residual hexavalent chromium impacts on the Property exist at depths of approximately 2 to 5 feet below ground surface (bgs) under an area extending approximately 20 feet south of the northern Property boundary and 110 feet west of the eastern Property boundary at Meade Street. The magnitude and extent of residual hexavalent chromium contamination in soil is shown on the attached **Figure D.2-1**. The concentrations are less than the industrial residual contaminant level (RCL) of 6.36 milligrams per kilogram but above the non-industrial RCL.

DESCRIPTION OF CAP

The cap is located on the northeast side of the Property, between the asphalt parking lot and the northern boundary with the Luvata Appleton LLC parcel. 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 cap is comprised of the existing surface materials including grass, gravel, concrete, and asphalt. The asphalt, concrete, and uncontaminated top soil and gravel layers are anticipated to be 3 to 4 inches thick. The cap is intended to prevent direct-contact with contaminated soil by occupants of the Property.

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 or gravel 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.).

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, asphalt 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

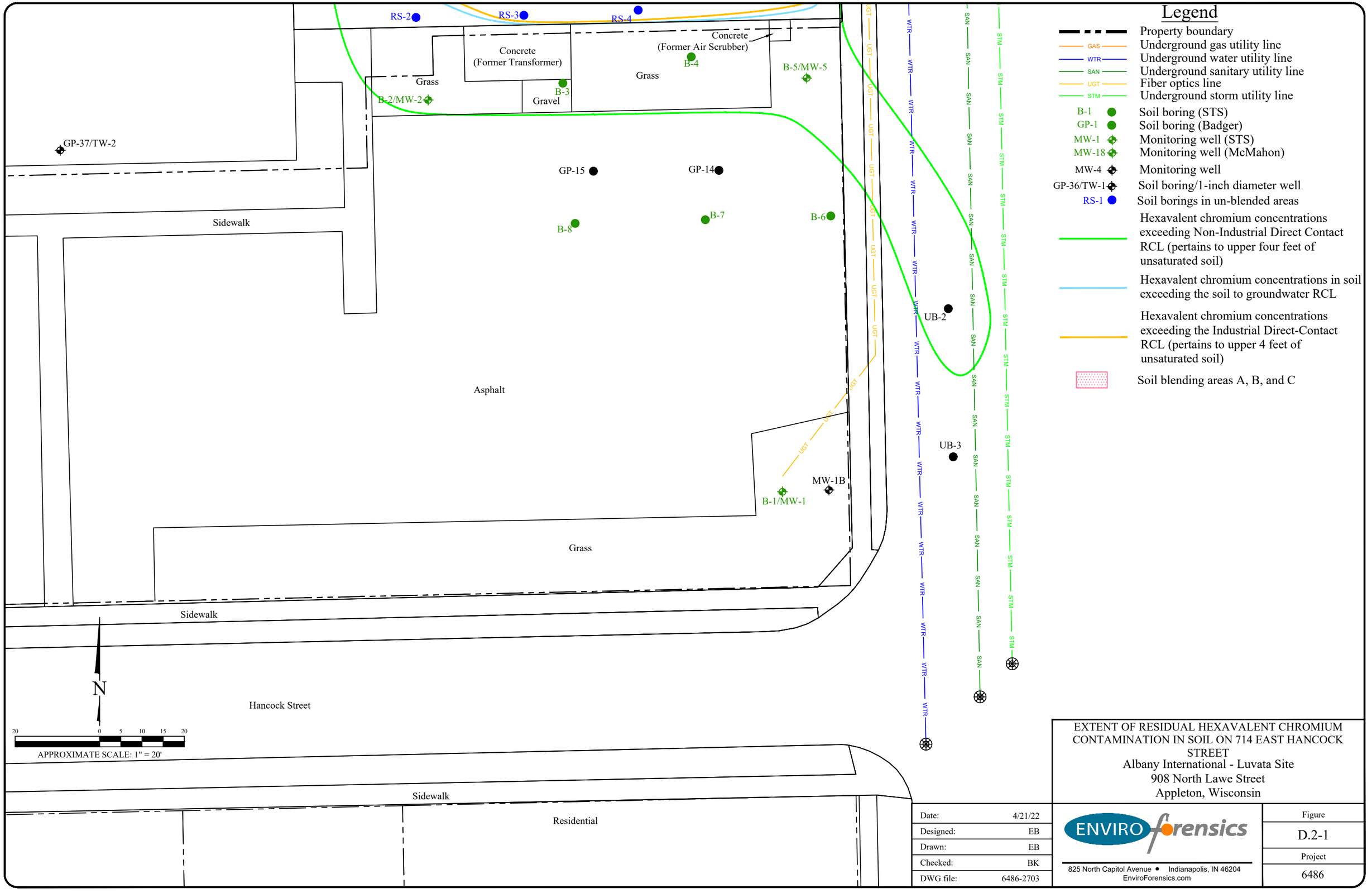
Property Owner:
Wood Brown LLC
Jamie DeBruin
PO Box 483
Kaukauna, WI 54130
jdebruin1@gmail.com

Signature: _____

Consultant:
EnviroForensics, LLC
Rob Hoverman, PG
N16 W23390 Stone Ridge Drive, Suite G
Waukesha, WI 53188
(262) 290-4001
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

D.2
FIGURES



EXTENT OF RESIDUAL HEXAVALENT CHROMIUM CONTAMINATION IN SOIL ON 714 EAST HANCOCK STREET
Albany International - Luvata Site
908 North Lawe Street
Appleton, Wisconsin

Date:	4/21/22
Designed:	EB
Drawn:	EB
Checked:	BK
DWG file:	6486-2703

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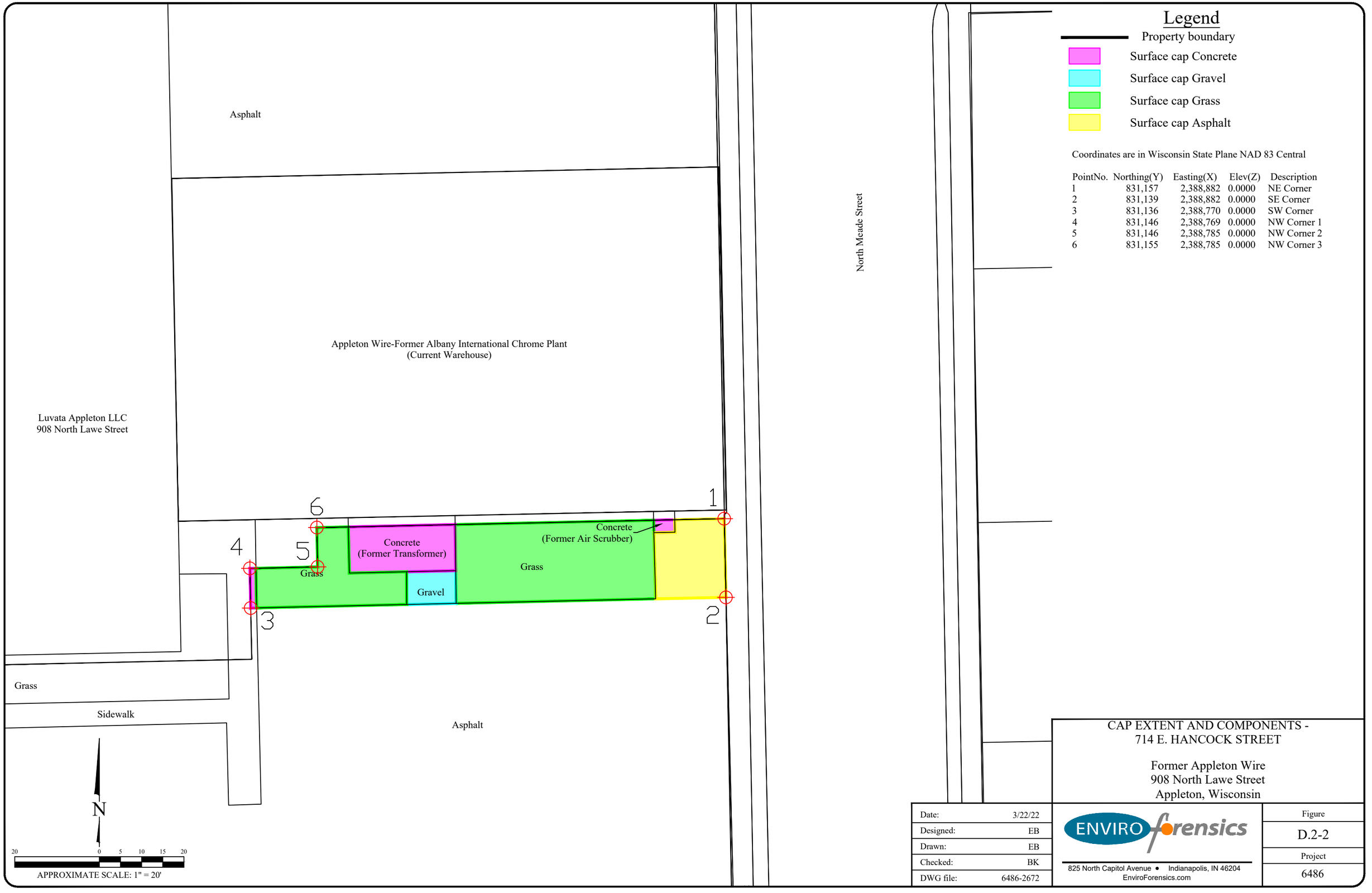
EnviroForensics.com

Figure
D.2-1

Project
6486



Legend

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

Coordinates are in Wisconsin State Plane NAD 83 Central

PointNo.	Northing(Y)	Easting(X)	Elev(Z)	Description
1	831,157	2,388,882	0.0000	NE Corner
2	831,139	2,388,882	0.0000	SE Corner
3	831,136	2,388,770	0.0000	SW Corner
4	831,146	2,388,769	0.0000	NW Corner 1
5	831,146	2,388,785	0.0000	NW Corner 2
6	831,155	2,388,785	0.0000	NW Corner 3

CAP EXTENT AND COMPONENTS -
714 E. HANCOCK STREET

Former Appleton Wire
908 North Lawe Street
Appleton, Wisconsin

Date:	3/22/22
Designed:	EB
Drawn:	EB
Checked:	BK
DWG file:	6486-2672

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Figure
D.2-2

Project
6486

D.3
PHOTOGRAPHS

View of the asphalt portion of the cap, facing north.

View of gravel and concrete portions of the cap, facing north.

View of the grass-covered portion of the cap, facing north.

Overview of the cap, facing west. The north-south extent of the cap is from the curb on the left side of the photograph to the boundary with the 908 N. Lawe Street parcel, which is approximately 3 feet off the building wall on the right side of the photograph.

D.4

CONTINUING OBLIGATIONS INSPECTION AND MAINTENANCE LOG

State of Wisconsin
Department of Natural Resources
dnr.wi.gov

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (2/14)

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: Appleton Wire (Former)

BRRTS No.: 02-45-000015

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?
		☐ monitoring well ☒ cover/barrier ☐ vapor mitigation system ☐ other:	Condition of the cap described and shown in the Cap Maintenance Plan		○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N

Continuing Obligations Inspection and Maintenance Log

{Click to Add/Edit Image}

Date added:

Title:

{Click to Add/Edit Image}

Date added:

Title:

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2984 Shawano Avenue
Green Bay WI 54313-6727

Tony Evers, Governor
Preston D. Cole, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

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

Luvata Appleton LLC
ATTN: Sam Edwards
553 Carter Court
Kimberly, WI 54136
Via Electronic Mail Only to 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

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)	• Residual Soil Contamination • Cover for Soil (Maintenance Required) • Residual Groundwater Contamination • Vapor Intrusion (VI) – Future Concern	May 2, 2022
714 E. Hancock Street	• Residual Soil Contamination • Cover for Soil (Maintenance Required) • Residual Groundwater Contamination	May 2, 2022
Meade Street right-of-way	• Residual Soil Contamination • Residual Groundwater Contamination	Not Applicable

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

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.

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, 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

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 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, 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, 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.

Sincerely,

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

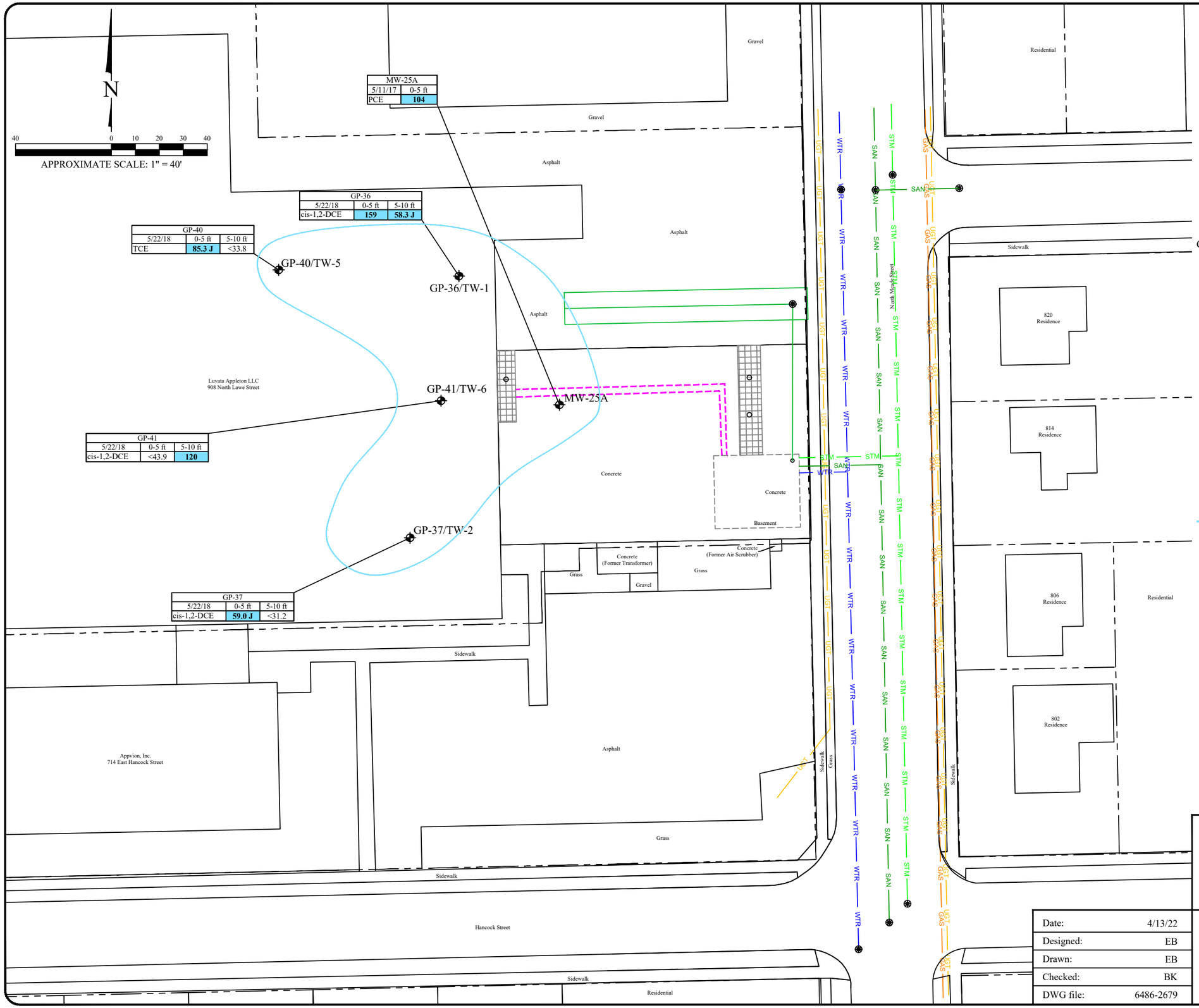
Attachments:

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)
Brian Kappen, EnviroForensics LLC (bkappen@enviroforensics.com)

Additional Resources:
The DNR fact sheets listed below can be obtained by visiting the DNR website at "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
- Underground gas utility line (GAS)
- Underground water utility line (WTR)
- Underground sanitary utility line (SAN)
- Fiber optics line (UGT)
- Underground storm utility line (STM)
- 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	**4.5**	**33,000**	**145,000**
TCE	**3.6**	**1,300**	**8,410**
cis-1,2-DCE	**41.2**	**156,000**	**2,340,000**

Note:
1. Bold shaded blue values exceed WDNR Soil to Groundwater Residual Contaminant Level
2. Results are reported in micrograms per kilogram (µg/kg)
3. PCE = Tetrachloroethene
4. TCE = Trichloroethene
5. cis-1,2-DCE = cis-1,2-Dichloroethene
6. CVOCs = Chlorinated Volatile Organic Compounds
7. RCL = Residual Contaminant Level
8. 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

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

Figure
B.2.b.1

Project
6486

Legend

- Property boundary
- Underground gas utility line
- Underground water utility line
- Underground sanitary utility line
- Fiber optics line
- 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

N

20 10 0 5 10 15 20

APPROXIMATE SCALE: 1" = 20'

Russel Metals, Inc.
975 North Meade Street

Luvata Appleton LLC
908 North Lawe Street

Appvion, Inc.
714 East Hancock Street

Residential

820 Residence

814 Residence

806 Residence

802 Residence

North Meade Street

Sidewalk

Hancock Street

Gravel

Asphalt

Concrete

Concrete (Former Transformer)

Concrete (Former Air Scrubber)

Grass

Storage

GP-35 GP-33 GP-34 GP-16 GP-32 GP-31 GP-20 GP-21 GP-22 GP-30 GP-39/TW-4 GP-41/TW-6 GP-29 GP-2 GP-38/TW-3 GP-7 GP-37/TW-2 GP-15 GP-14 B-2 B-7 B-6 GP-40/TW-5 GP-36/TW-1

MW-22A MW-25A MW-21A MW-10B MW-1B

B-16 B-15 B-10/MW-10 B-9 B-4 B-5/MW-5 B-3 B-2/MW-2 B-1/MW-1

UB-4 UB-1 UB-2 UB-3

RS-11 RS-12 RS-10 RS-9 RS-8 RS-7 RS-5 RS-6 RS-1 RS-2 RS-3 RS-4

BSS-1 BSS-2 BSS-3 BSS-7 BSS-8 BSS-9 BSS-4 BSS-6 BSS-5 BSS-11 BSS-10

A B C

GP-13 GP-12

Figure	B.2.b.2
Project	6486

RESIDUAL SOIL CONTAMINATION - HEXAVALENT CHROMIUM

Former Appleton Wire
908 North Lawe Street
Appleton, Wisconsin

Date:	4/5/19
Designed:	EB
Drawn:	EB
Checked:	BK
DWG file:	6486-2681

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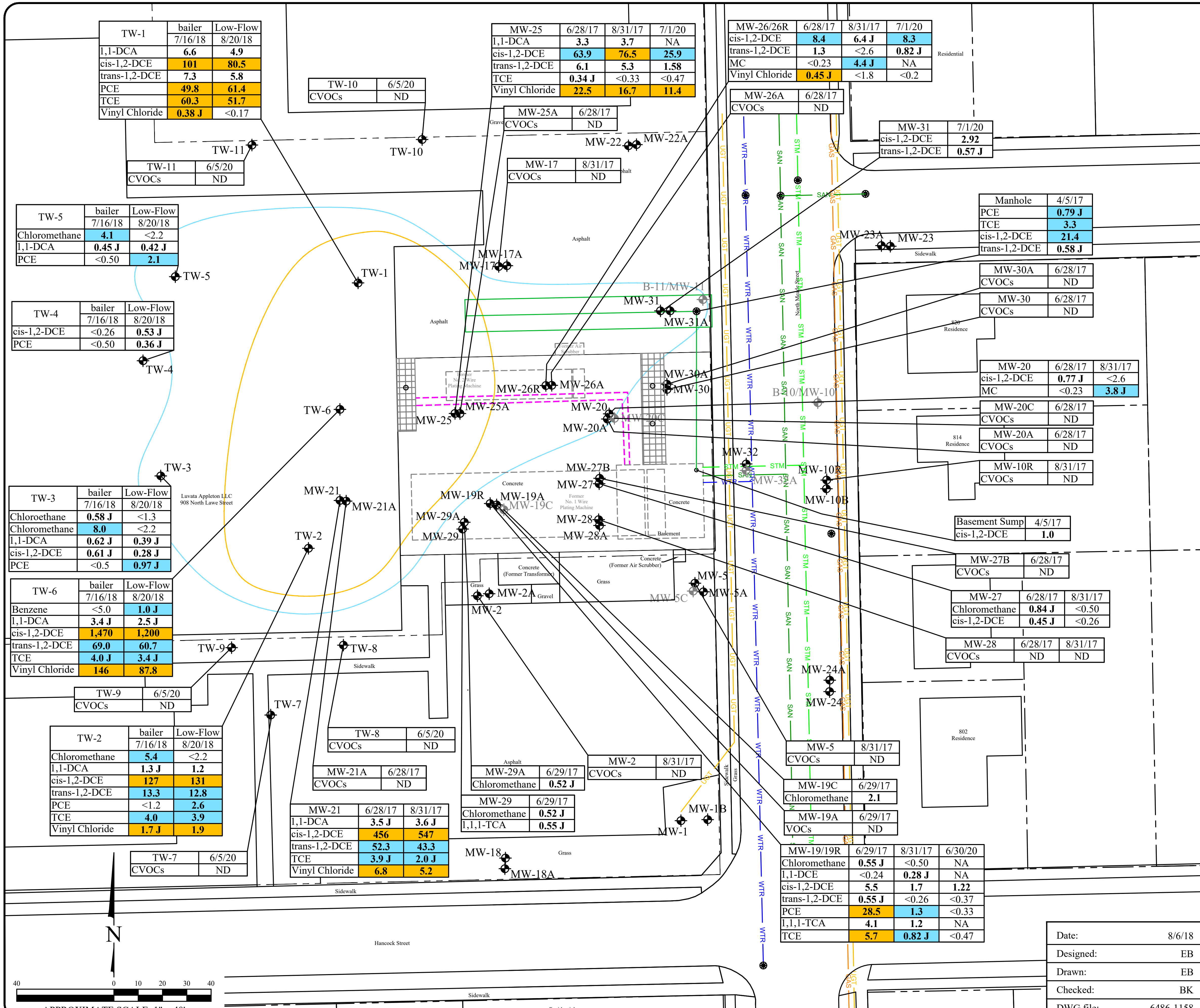
EnviroForensics.com

No.	Date	Revision	Approved
1	7/3/18	Updates	WF



TW-1	bailer 7/16/18	Low-Flow 8/20/18
1,1-DCA	6.6	4.9
cis-1,2-DCE	101	80.5
trans-1,2-DCE	7.3	5.8
PCE	49.8	61.4
TCE	60.3	51.7
Vinyl Chloride	0.38 J	<0.17

TW-10	6/5/20
CVOCs	ND

TW-11	6/5/20
CVOCs	ND

TW-5	bailer 7/16/18	Low-Flow 8/20/18
Chloromethane	4.1	<2.2
1,1-DCA	0.45 J	0.42 J
PCE	<0.50	2.1

TW-4	bailer 7/16/18	Low-Flow 8/20/18
cis-1,2-DCE	<0.26	0.53 J
PCE	<0.50	0.36 J

TW-3	bailer 7/16/18	Low-Flow 8/20/18
Chloroethane	0.58 J	<1.3
Chloromethane	8.0	<2.2
1,1-DCA	0.62 J	0.39 J
cis-1,2-DCE	0.61 J	0.28 J
PCE	<0.5	0.97 J

TW-6	bailer 7/16/18	Low-Flow 8/20/18
Benzene	<5.0	1.0 J
1,1-DCA	3.4 J	2.5 J
cis-1,2-DCE	1,470	1,200
trans-1,2-DCE	69.0	60.7
TCE	4.0 J	3.4 J
Vinyl Chloride	146	87.8

TW-9	6/5/20
CVOCs	ND

TW-2	bailer 7/16/18	Low-Flow 8/20/18
Chloromethane	5.4	<2.2
1,1-DCA	1.3 J	1.2
cis-1,2-DCE	127	131
trans-1,2-DCE	13.3	12.8
PCE	<1.2	2.6
TCE	4.0	3.9
Vinyl Chloride	1.7 J	1.9

TW-7	6/5/20
CVOCs	ND

TW-8	6/5/20
CVOCs	ND

MW-21A	6/28/17
CVOCs	ND

MW-21	6/28/17	8/31/17
1,1-DCA	3.5 J	3.6 J
cis-1,2-DCE	456	547
trans-1,2-DCE	52.3	43.3
TCE	3.9 J	2.0 J
Vinyl Chloride	6.8	5.2

MW-29A	6/29/17
Chloromethane	0.52 J

MW-29	6/29/17
Chloromethane	0.52 J
1,1,1-TCA	0.55 J

MW-2	8/31/17
CVOCs	ND

MW-25	6/28/17	8/31/17	7/1/20
1,1-DCA	3.3	3.7	NA
cis-1,2-DCE	63.9	76.5	25.9
trans-1,2-DCE	6.1	5.3	1.58
TCE	0.34 J	<0.33	<0.47
Vinyl Chloride	22.5	16.7	11.4

MW-25A	6/28/17
CVOCs	ND

MW-17	8/31/17
CVOCs	ND

MW-26/26R	6/28/17	8/31/17	7/1/20
cis-1,2-DCE	8.4	6.4 J	8.3
trans-1,2-DCE	1.3	<2.6	0.82 J
MC	<0.23	4.4 J	NA
Vinyl Chloride	0.45 J	<1.8	<0.2

MW-26A	6/28/17
CVOCs	ND

MW-31	7/1/20
cis-1,2-DCE	2.92
trans-1,2-DCE	0.57 J

Manhole	4/5/17
PCE	0.79 J
TCE	3.3
cis-1,2-DCE	21.4
trans-1,2-DCE	0.58 J

MW-30A	6/28/17
CVOCs	ND

MW-30	6/28/17
CVOCs	ND

MW-20	6/28/17	8/31/17
cis-1,2-DCE	0.77 J	<2.6
MC	<0.23	3.8 J

MW-20C	6/28/17
CVOCs	ND

MW-20A	6/28/17
CVOCs	ND

MW-10R	8/31/17
CVOCs	ND

Basement Sump	4/5/17
cis-1,2-DCE	1.0

MW-27B	6/28/17
CVOCs	ND

MW-27	6/28/17	8/31/17
Chloromethane	0.84 J	<0.50
cis-1,2-DCE	0.45 J	<0.26

MW-28	6/28/17	8/31/17
CVOCs	ND	ND

MW-5	8/31/17
CVOCs	ND

MW-19C	6/29/17
Chloromethane	2.1

MW-19A	6/29/17
VOCs	ND

MW-19/19R	6/29/17	8/31/17	6/30/20
Chloromethane	0.55 J	<0.50	NA
1,1-DCE	<0.24	0.28 J	NA
cis-1,2-DCE	5.5	1.7	1.22
trans-1,2-DCE	0.55 J	<0.26	<0.37
PCE	28.5	1.3	<0.33
1,1,1-TCA	4.1	1.2	NA
TCE	5.7	0.82 J	<0.47

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-5C — Abandoned monitoring well
- Dairy tile floor

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

Note:

1. Bolded and orange shaded values exceed the Public Health Enforcement Standard
2. Bolded and blue shaded values exceed the Public Health Preventive Action Limit
3. Bolded values are above detection limits
4. J = Analyte concentration less that laboratory detection limits
5. Samples analyzed using EPA SW-846 Method 8260
6. All results reported in units of micrograms per liter (µg/L)
7. PCE = Tetrachloroethene
8. TCE = Trichloroethene
9. 1,1-DCA = 1,1-Dichloroethane
10. cis-1,2-DCE = cis-1,2-Dichloroethene
11. trans-1,2-DCE = trans-1,2-Dichloroethene
12. 1,1,1-TCA = 1,1,1-Tichloroethane
13. MC = Methylene Chloride
14. CVOCs = Chlorinated Volatile Organic Compounds
15. ND = Not detected above laboratory detection limits
16. 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

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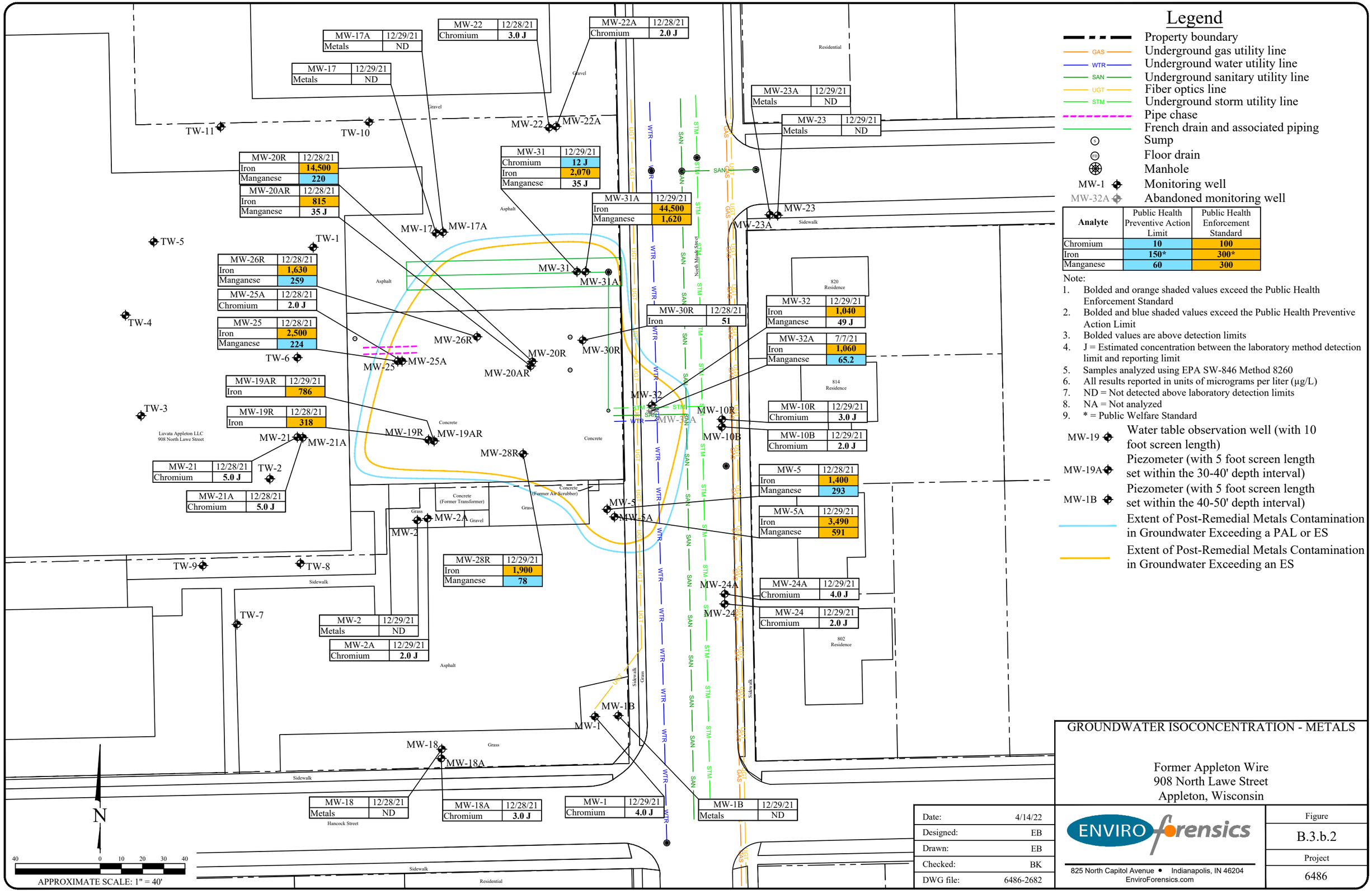
EnviroForensics.com

Figure	Project
B.3.b.1	6486



Legend

- Property boundary
- Underground gas utility line
- Underground water utility line
- Underground sanitary utility line
- Fiber optics line
- 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:

1. Bolded and orange shaded values exceed the Public Health Enforcement Standard
2. Bolded and blue shaded values exceed the Public Health Preventive Action Limit
3. Bolded values are above detection limits
4. J = Estimated concentration between the laboratory method detection limit and reporting limit
5. Samples analyzed using EPA SW-846 Method 8260
6. All results reported in units of micrograms per liter (µg/L)
7. ND = Not detected above laboratory detection limits
8. NA = Not analyzed
9. * = 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

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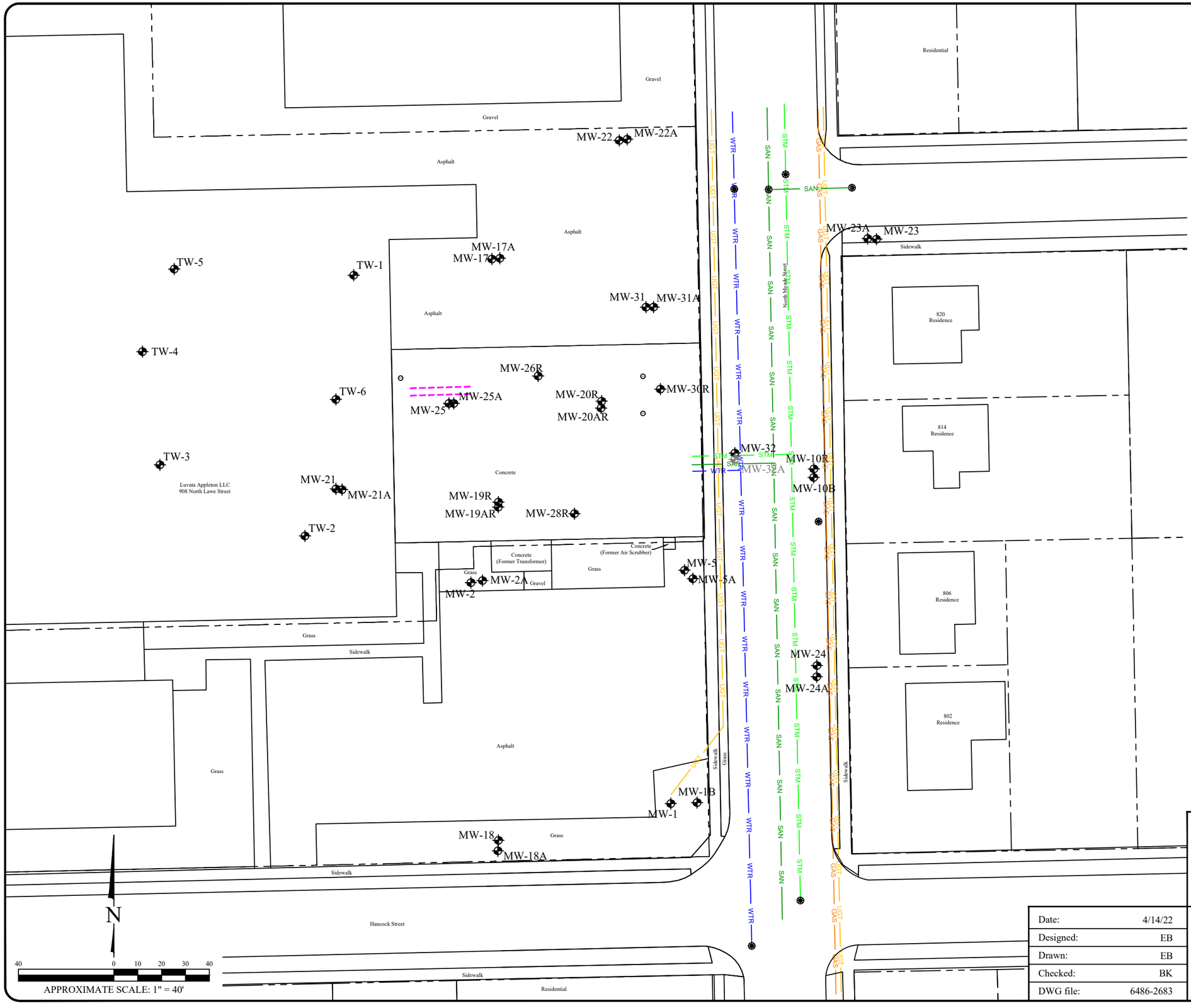
825 North Capitol Avenue • Indianapolis, IN 46204
EnviroForensics.com

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
- FD — 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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EnviroForensics.com

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.).

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

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

D.2
FIGURES

N

20 0 5 10 15 20

APPROXIMATE SCALE: 1" = 20'

Gravel

Gravel

GP-33

GP-34

MW-22A

GP-16

Asphalt

GP-32

B-16

B-15

Asphalt

GP-20

GP-21

GP-22

GP-31

RS-11

RS-12

UB-1

BSS-2

BSS-1

C

BSS-3

Asphalt

GP-30

RS-10

RS-9

RS-8

GP-36/TW-1

A

RS-7

B-10/MW-10

GP-1

MW-25A

BSS-7

BSS-8

BSS-9

GP-29

GP-2

RS-5

RS-6

Concrete

GP-41/TW-6

B

BSS-4

GP-7

GP-13

MW-21A

RS-1

BSS-6

GP-12

BSS-11

BSS-10

Storage

BSS-5

RS-2

RS-3

RS-4

Concrete
(Former Air Scrubber)

Concrete
(Former Transformer)

B-4

Sidewalk

Grass

B-9

MW-10B

North Meade Street

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
- B-1 — Soil boring (STS)
- GP-1 — Soil boring (Badger)
- MW-1 — Monitoring well (STS)
- MW-18 — Monitoring well (McMahon)
- 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
- 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

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

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

Luvata Appleton LLC
908 North Lawe Street

Concrete

Former
No. 1 Wire
Plating Machine

Storage

Basement

Sidewalk

Grass

Concrete
(Former Transformer)

Concrete
(Former Air Scrubber)

Grass

Gravel

Grass

Sidewalk

Asphalt

Appvion, Inc.
714 East Hancock Street

N

30 0 10 20 30

APPROXIMATE SCALE: 1" = 30'

North Meade Street

Sidewalk

820
Residence

814
Residence

806
Residence

802
Residence

Sidewalk

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

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

ENVIRO forensics
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EnviroForensics.com

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

State of Wisconsin
Department of Natural Resources
dnr.wi.gov

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (2/14)

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: Appleton Wire (Former)

BRRTS No.: 02-45-000015

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?
		☐ monitoring well ☒ cover/barrier ☐ vapor mitigation system ☐ other:	Condition of the cap described and shown in the Cap Maintenance Plan		○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N

Continuing Obligations Inspection and Maintenance Log

{Click to Add/Edit Image}

Date added:

Title:

{Click to Add/Edit Image}

Date added:

Title:

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2984 Shawano Avenue
Green Bay WI 54313-6727

Tony Evers, Governor
Preston D. Cole, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

November 30, 2022

City of Appleton Public Works
ATTN: Paula Vandehey
100 North Appleton Street
Appleton, WI 54911
Via Electronic Mail Only to paula.vandehey@appleton.org

SUBJECT: Notice of Closure Approval with Continuing Obligations for Right-of-Way Holder for North Meade Street adjacent to 908 N. Lawe Street
Case Closure for Appleton Wire (Former), 908 N. Lawe Street, Appleton, WI 54911
BRRTS #: 02-45-000015, FID #: 445035910

Dear Ms. Vandehey:

The Wisconsin Department of Natural Resources (DNR) recently approved the completion of the response actions conducted at the site identified above (the Site). This letter describes how that approval applies to the right-of-way (ROW) for North Meade Street adjacent to 908 N. Lawe Street, Appleton, Wisconsin. As the ROW holder, you are responsible for complying with continuing obligations for any work you conduct in the ROW.

State law—Wisconsin Statute (Wis. Stat.) ch. 292— directs parties responsible for the discharge of a hazardous substance or environmental pollution to take necessary actions to restore the environment to the extent practicable and minimize harmful effects from the discharge to the air, lands or waters of this state. The law allows some contamination to remain in the environment if it does not pose a threat to public health, safety, welfare, or the environment.

On May 5, 2022, you received information from EnviroForensics LLC about the metals contamination from the Site remaining in the soil and groundwater in the North Meade Street ROW, and about the continuing obligations necessary to limit exposure to remaining contamination.

APPLICABLE CONTINUING OBLIGATIONS

The continuing obligations that apply to this ROW are described below and are consistent with Wis. Stat. § 292.12 and Wisconsin Administrative Code (Wis. Admin. Code) chs. NR 700 to 799.

ADDRESS (Appleton, WI)	COS APPLIED
Meade Street right-of-way	• Residual Soil Contamination • Residual Groundwater Contamination

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 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 in the Meade Street right-of-way, as indicated on the enclosed map (Figure B.2.b.2, Residual Soil Contamination – Hexavalent Chromium, April 4, 2022). 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.

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 are present in the Meade Street right-of-way as shown on the enclosed map (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 monitoring wells MW-10R, MW-10B, MW-23, MW-23A, MW-24, MW-24A, and MW-32 that remain in the right-of-way are being retained by Albany International Corporation and Luvata Appleton LLC for continued monitoring for another site undergoing environmental cleanup, Appleton Wire (Former) – Site 2 BRRTS # 02-45-587658. 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.

OTHER CLOSURE REQUIREMENTS

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, 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 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."

ADDITIONAL 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 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, search "RR submittal portal." Questions on using this portal can be directed to the Project Manager below or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search "RR contacts" and select the EPA tab.

If you have questions or concerns regarding this letter, please contact the DNR project manager, David Neste at (920) 362-2072 or David.Neste@wisconsin.gov.

Sincerely,

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

Attachments:

- Figure B.2.b.2, Residual Soil Contamination – Hexavalent Chromium, April 5, 201922
- Figure B.3.b.2, Groundwater Isoconcentration – Metals, April 14, 2022
- Case Closure with Continuing Obligations letter, dated November 30, 2022

cc: Joe Gaug, Albany International Corp. (Joseph.Gaug@albint.com)
Sam Edwards, Luvata Appleton LLC (Sam.Edwards@luvata.com)
Rob Hoverman, EnviroForensics LLC (rhoverman@enviroforensics.com)
Brian Kappen, EnviroForensics LLC (bkappen@enviroforensics.com)

Legend

- Property boundary
- Underground gas utility line
- Underground water utility line
- Underground sanitary utility line
- Fiber optics line
- 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

N

20 10 0 5 10 15 20

APPROXIMATE SCALE: 1" = 20'

Russel Metals, Inc.
975 North Meade Street

Luvata Appleton LLC
908 North Lawe Street

Appvion, Inc.
714 East Hancock Street

Residential

820 Residence

814 Residence

806 Residence

802 Residence

North Meade Street

Sidewalk

Hancock Street

Gravel

Asphalt

Concrete

Concrete (Former Transformer)

Concrete (Former Air Scrubber)

Grass

Storage

GP-35 GP-33 GP-34 GP-16 GP-32 GP-31 GP-20 GP-21 GP-22 GP-30 GP-39/TW-4 GP-41/TW-6 GP-29 GP-2 GP-38/TW-3 GP-7 GP-37/TW-2 GP-15 GP-14 B-2 B-7 B-6 GP-40/TW-5 GP-36/TW-1

MW-22A MW-25A MW-21A MW-10B MW-1B

B-16 B-15 B-10/MW-10 B-9 B-4 B-5/MW-5 B-3 B-2/MW-2 B-1/MW-1

UB-4 UB-1 UB-2 UB-3

RS-11 RS-12 RS-10 RS-9 RS-8 RS-7 RS-5 RS-6 RS-1 RS-2 RS-3 RS-4

BSS-1 BSS-2 BSS-3 BSS-7 BSS-8 BSS-9 BSS-4 BSS-6 BSS-5 BSS-11 BSS-10

A B C

GP-13 GP-12

Figure	B.2.b.2
Project	6486

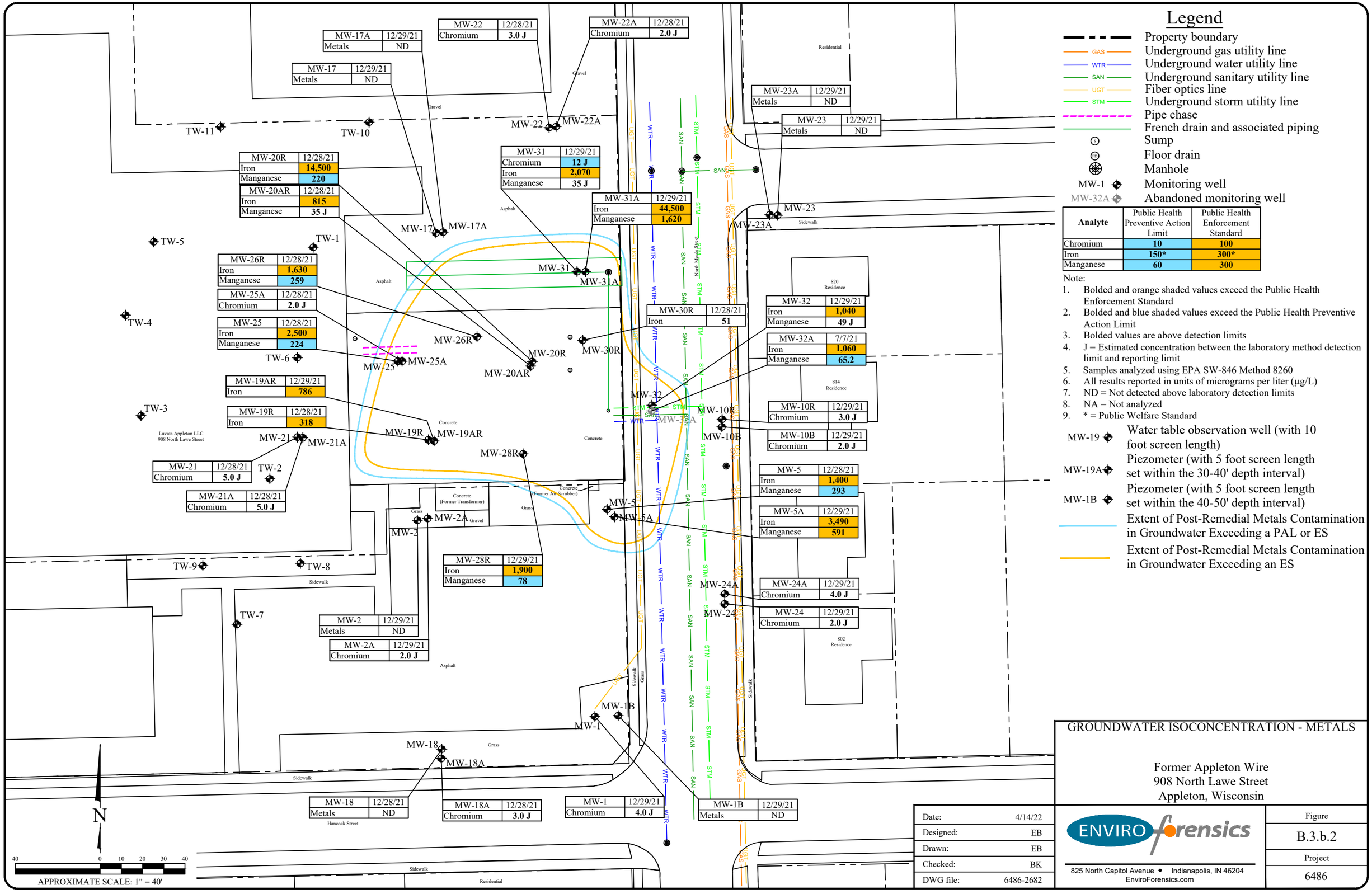
RESIDUAL SOIL CONTAMINATION - HEXAVALENT CHROMIUM

Former Appleton Wire
908 North Lawe Street
Appleton, Wisconsin

Date:	4/5/19
Designed:	EB
Drawn:	EB
Checked:	BK
DWG file:	6486-2681

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

No.	Date	Revision	Approved
1	7/3/18	Updates	WF



Legend

- Property boundary
- Underground gas utility line
- Underground water utility line
- Underground sanitary utility line
- Fiber optics line
- 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:

1. Bolded and orange shaded values exceed the Public Health Enforcement Standard
2. Bolded and blue shaded values exceed the Public Health Preventive Action Limit
3. Bolded values are above detection limits
4. J = Estimated concentration between the laboratory method detection limit and reporting limit
5. Samples analyzed using EPA SW-846 Method 8260
6. All results reported in units of micrograms per liter (µg/L)
7. ND = Not detected above laboratory detection limits
8. NA = Not analyzed
9. * = 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

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

Figure
B.3.b.2

Project
6486

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2984 Shawano Avenue
Green Bay WI 54313-6727

Tony Evers, Governor
Preston D. Cole, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

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

Luvata Appleton LLC
ATTN: Sam Edwards
553 Carter Court
Kimberly, WI 54136
Via Electronic Mail Only to 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

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)	• Residual Soil Contamination • Cover for Soil (Maintenance Required) • Residual Groundwater Contamination • Vapor Intrusion (VI) – Future Concern	May 2, 2022
714 E. Hancock Street	• Residual Soil Contamination • Cover for Soil (Maintenance Required) • Residual Groundwater Contamination	May 2, 2022
Meade Street right-of-way	• Residual Soil Contamination • Residual Groundwater Contamination	Not Applicable

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

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.

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, 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

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 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, 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, 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.

Sincerely,

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

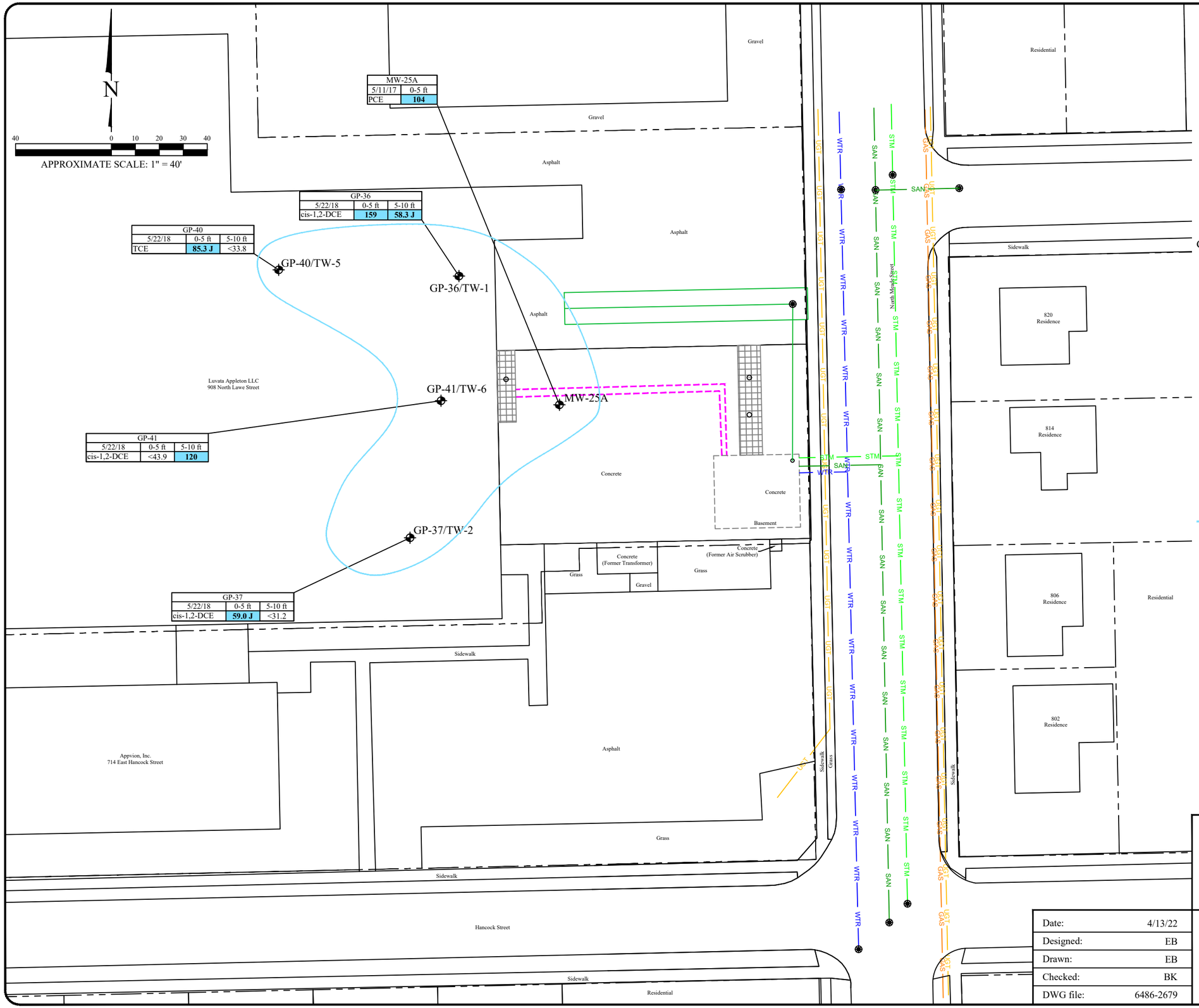
Attachments:

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)
Brian Kappen, EnviroForensics LLC (bkappen@enviroforensics.com)

Additional Resources:
The DNR fact sheets listed below can be obtained by visiting the DNR website at "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
- Underground gas utility line (GAS)
- Underground water utility line (WTR)
- Underground sanitary utility line (SAN)
- Fiber optics line (UGT)
- Underground storm utility line (STM)
- 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	**4.5**	**33,000**	**145,000**
TCE	**3.6**	**1,300**	**8,410**
cis-1,2-DCE	**41.2**	**156,000**	**2,340,000**

Note:
1. Bold shaded blue values exceed WDNR Soil to Groundwater Residual Contaminant Level
2. Results are reported in micrograms per kilogram (µg/kg)
3. PCE = Tetrachloroethene
4. TCE = Trichloroethene
5. cis-1,2-DCE = cis-1,2-Dichloroethene
6. CVOCs = Chlorinated Volatile Organic Compounds
7. RCL = Residual Contaminant Level
8. 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

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EnviroForensics.com

Figure
B.2.b.1

Project
6486

Legend

- Property boundary
- Underground gas utility line
- Underground water utility line
- Underground sanitary utility line
- Fiber optics line
- 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

N

20 10 0 5 10 15 20

APPROXIMATE SCALE: 1" = 20'

Russel Metals, Inc.
975 North Meade Street

Luvata Appleton LLC
908 North Lawe Street

Appvion, Inc.
714 East Hancock Street

Residential

820 Residence

814 Residence

806 Residence

802 Residence

North Meade Street

Sidewalk

Hancock Street

Gravel

Asphalt

Concrete

Concrete (Former Transformer)

Concrete (Former Air Scrubber)

Grass

Storage

GP-35 GP-33 GP-34 GP-16 GP-32 GP-31 GP-20 GP-21 GP-22 GP-30 GP-39/TW-4 GP-41/TW-6 GP-29 GP-2 GP-38/TW-3 GP-7 GP-37/TW-2 GP-15 GP-14 B-2 B-7 B-6 GP-40/TW-5 GP-36/TW-1

MW-22A MW-25A MW-21A MW-10B MW-1B

B-16 B-15 B-10/MW-10 B-9 B-4 B-5/MW-5 B-3 B-2/MW-2 B-1/MW-1

UB-4 UB-1 UB-2 UB-3

RS-11 RS-12 RS-10 RS-9 RS-8 RS-7 RS-5 RS-6 RS-1 RS-2 RS-3 RS-4

BSS-1 BSS-2 BSS-3 BSS-7 BSS-8 BSS-9 BSS-4 BSS-6 BSS-5 BSS-11 BSS-10

A B C

GP-13 GP-12

Figure	B.2.b.2
Project	6486

RESIDUAL SOIL CONTAMINATION - HEXAVALENT CHROMIUM

Former Appleton Wire
908 North Lawe Street
Appleton, Wisconsin

Date:	4/5/19
Designed:	EB
Drawn:	EB
Checked:	BK
DWG file:	6486-2681

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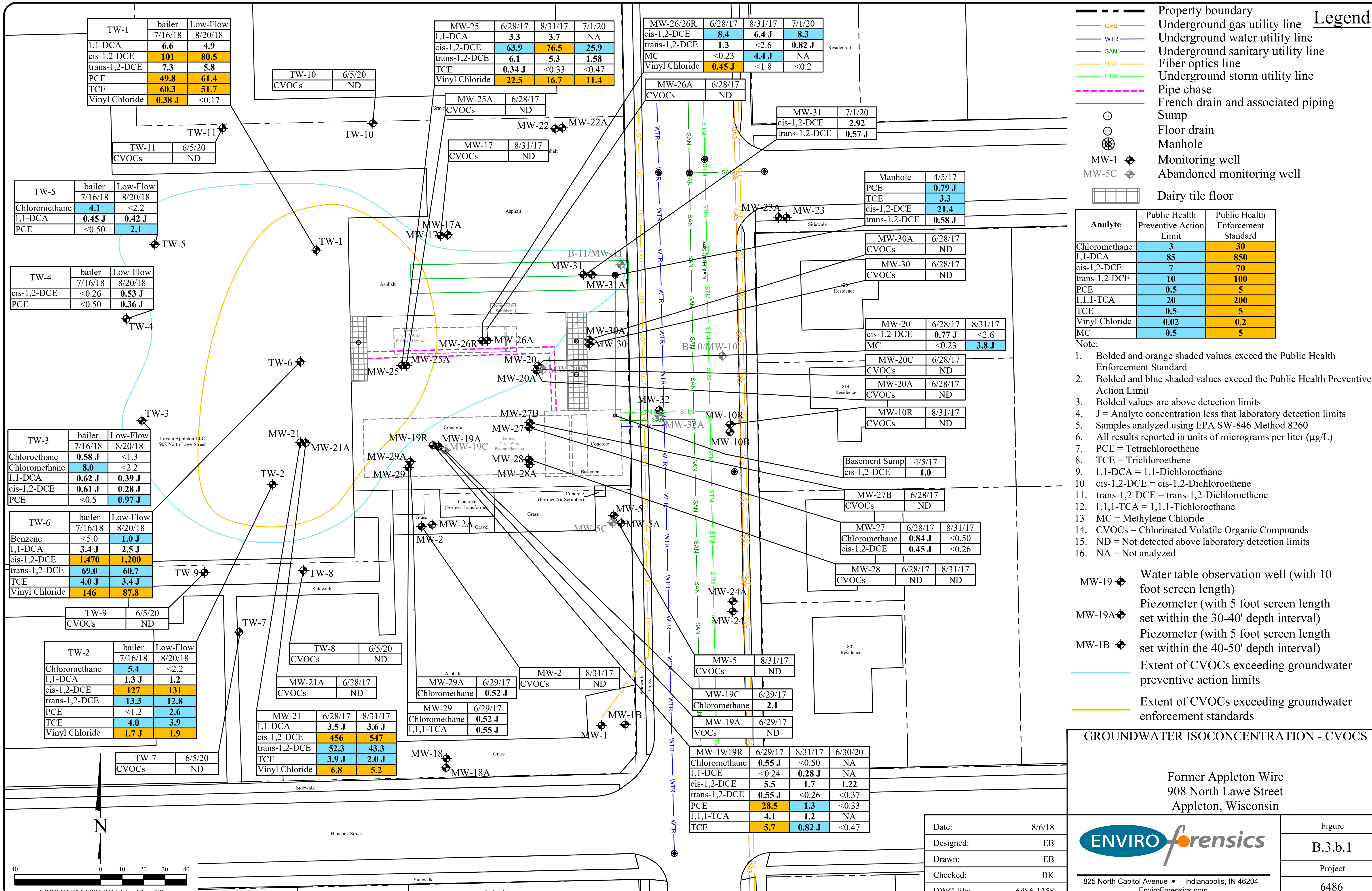
No.	Date	Revision	Approved
1	7/3/18	Updates	WF



TW-1	bailer 7/16/18	Low-Flow 8/20/18
1,1-DCA	6.6	4.9
cis-1,2-DCE	101	80.5
trans-1,2-DCE	7.3	5.8
PCE	49.8	61.4
TCE	60.3	51.7
Vinyl Chloride	0.38 J	<0.17

TW-10	6/5/20
CVOCs	ND

TW-11	6/5/20
CVOCs	ND

TW-5	bailer 7/16/18	Low-Flow 8/20/18
Chloromethane	4.1	<2.2
1,1-DCA	0.45 J	0.42 J
PCE	<0.50	2.1

TW-4	bailer 7/16/18	Low-Flow 8/20/18
cis-1,2-DCE	<0.26	0.53 J
PCE	<0.50	0.36 J

TW-3	bailer 7/16/18	Low-Flow 8/20/18
Chloroethane	0.58 J	<1.3
Chloromethane	8.0	<2.2
1,1-DCA	0.62 J	0.39 J
cis-1,2-DCE	0.61 J	0.28 J
PCE	<0.5	0.97 J

TW-6	bailer 7/16/18	Low-Flow 8/20/18
Benzene	<5.0	1.0 J
1,1-DCA	3.4 J	2.5 J
cis-1,2-DCE	1,470	1,200
trans-1,2-DCE	69.0	60.7
TCE	4.0 J	3.4 J
Vinyl Chloride	146	87.8

TW-9	6/5/20
CVOCs	ND

TW-2	bailer 7/16/18	Low-Flow 8/20/18
Chloromethane	5.4	<2.2
1,1-DCA	1.3 J	1.2
cis-1,2-DCE	127	131
trans-1,2-DCE	13.3	12.8
PCE	<1.2	2.6
TCE	4.0	3.9
Vinyl Chloride	1.7 J	1.9

TW-7	6/5/20
CVOCs	ND

TW-8	6/5/20
CVOCs	ND

MW-21A	6/28/17
CVOCs	ND

MW-21	6/28/17	8/31/17
1,1-DCA	3.5 J	3.6 J
cis-1,2-DCE	456	547
trans-1,2-DCE	52.3	43.3
TCE	3.9 J	2.0 J
Vinyl Chloride	6.8	5.2

MW-29A	6/29/17
Chloromethane	0.52 J

MW-29	6/29/17
Chloromethane	0.52 J
1,1,1-TCA	0.55 J

MW-2	8/31/17
CVOCs	ND

MW-25	6/28/17	8/31/17	7/1/20
1,1-DCA	3.3	3.7	NA
cis-1,2-DCE	63.9	76.5	25.9
trans-1,2-DCE	6.1	5.3	1.58
TCE	0.34 J	<0.33	<0.47
Vinyl Chloride	22.5	16.7	11.4

MW-25A	6/28/17
CVOCs	ND

MW-17	8/31/17
CVOCs	ND

MW-26/26R	6/28/17	8/31/17	7/1/20
cis-1,2-DCE	8.4	6.4 J	8.3
trans-1,2-DCE	1.3	<2.6	0.82 J
MC	<0.23	4.4 J	NA
Vinyl Chloride	0.45 J	<1.8	<0.2

MW-26A	6/28/17
CVOCs	ND

MW-31	7/1/20
cis-1,2-DCE	2.92
trans-1,2-DCE	0.57 J

Manhole	4/5/17
PCE	0.79 J
TCE	3.3
cis-1,2-DCE	21.4
trans-1,2-DCE	0.58 J

MW-30A	6/28/17
CVOCs	ND

MW-30	6/28/17
CVOCs	ND

MW-20	6/28/17	8/31/17
cis-1,2-DCE	0.77 J	<2.6
MC	<0.23	3.8 J

MW-20C	6/28/17
CVOCs	ND

MW-20A	6/28/17
CVOCs	ND

MW-10R	8/31/17
CVOCs	ND

Basement Sump	4/5/17
cis-1,2-DCE	1.0

MW-27B	6/28/17
CVOCs	ND

MW-27	6/28/17	8/31/17
Chloromethane	0.84 J	<0.50
cis-1,2-DCE	0.45 J	<0.26

MW-28	6/28/17	8/31/17
CVOCs	ND	ND

MW-5	8/31/17
CVOCs	ND

MW-19C	6/29/17
Chloromethane	2.1

MW-19A	6/29/17
VOCs	ND

MW-19/19R	6/29/17	8/31/17	6/30/20
Chloromethane	0.55 J	<0.50	NA
1,1-DCE	<0.24	0.28 J	NA
cis-1,2-DCE	5.5	1.7	1.22
trans-1,2-DCE	0.55 J	<0.26	<0.37
PCE	28.5	1.3	<0.33
1,1,1-TCA	4.1	1.2	NA
TCE	5.7	0.82 J	<0.47

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-5C — Abandoned monitoring well
- Dairy tile floor

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

Note:
1. Bolded and orange shaded values exceed the Public Health Enforcement Standard
2. Bolded and blue shaded values exceed the Public Health Preventive Action Limit
3. Bolded values are above detection limits
4. J = Analyte concentration less that laboratory detection limits
5. Samples analyzed using EPA SW-846 Method 8260
6. All results reported in units of micrograms per liter (µg/L)
7. PCE = Tetrachloroethene
8. TCE = Trichloroethene
9. 1,1-DCA = 1,1-Dichloroethane
10. cis-1,2-DCE = cis-1,2-Dichloroethene
11. trans-1,2-DCE = trans-1,2-Dichloroethene
12. 1,1,1-TCA = 1,1,1-Tichloroethane
13. MC = Methylene Chloride
14. CVOCs = Chlorinated Volatile Organic Compounds
15. ND = Not detected above laboratory detection limits
16. 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

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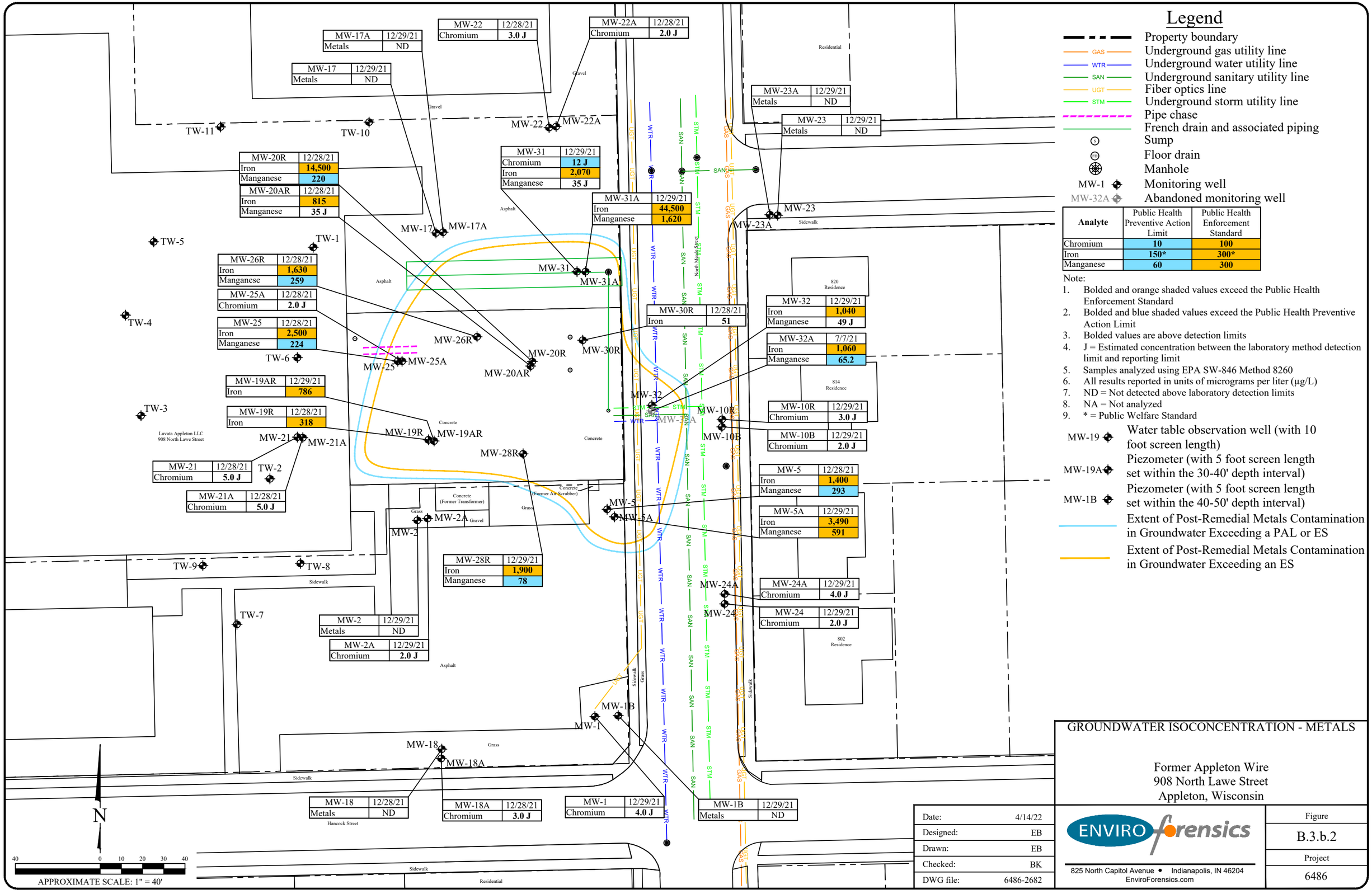
Figure	B.3.b.1
Project	6486



Legend

- Property boundary
- Underground gas utility line
- Underground water utility line
- Underground sanitary utility line
- Fiber optics line
- 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:

1. Bolded and orange shaded values exceed the Public Health Enforcement Standard
2. Bolded and blue shaded values exceed the Public Health Preventive Action Limit
3. Bolded values are above detection limits
4. J = Estimated concentration between the laboratory method detection limit and reporting limit
5. Samples analyzed using EPA SW-846 Method 8260
6. All results reported in units of micrograms per liter (µg/L)
7. ND = Not detected above laboratory detection limits
8. NA = Not analyzed
9. * = 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

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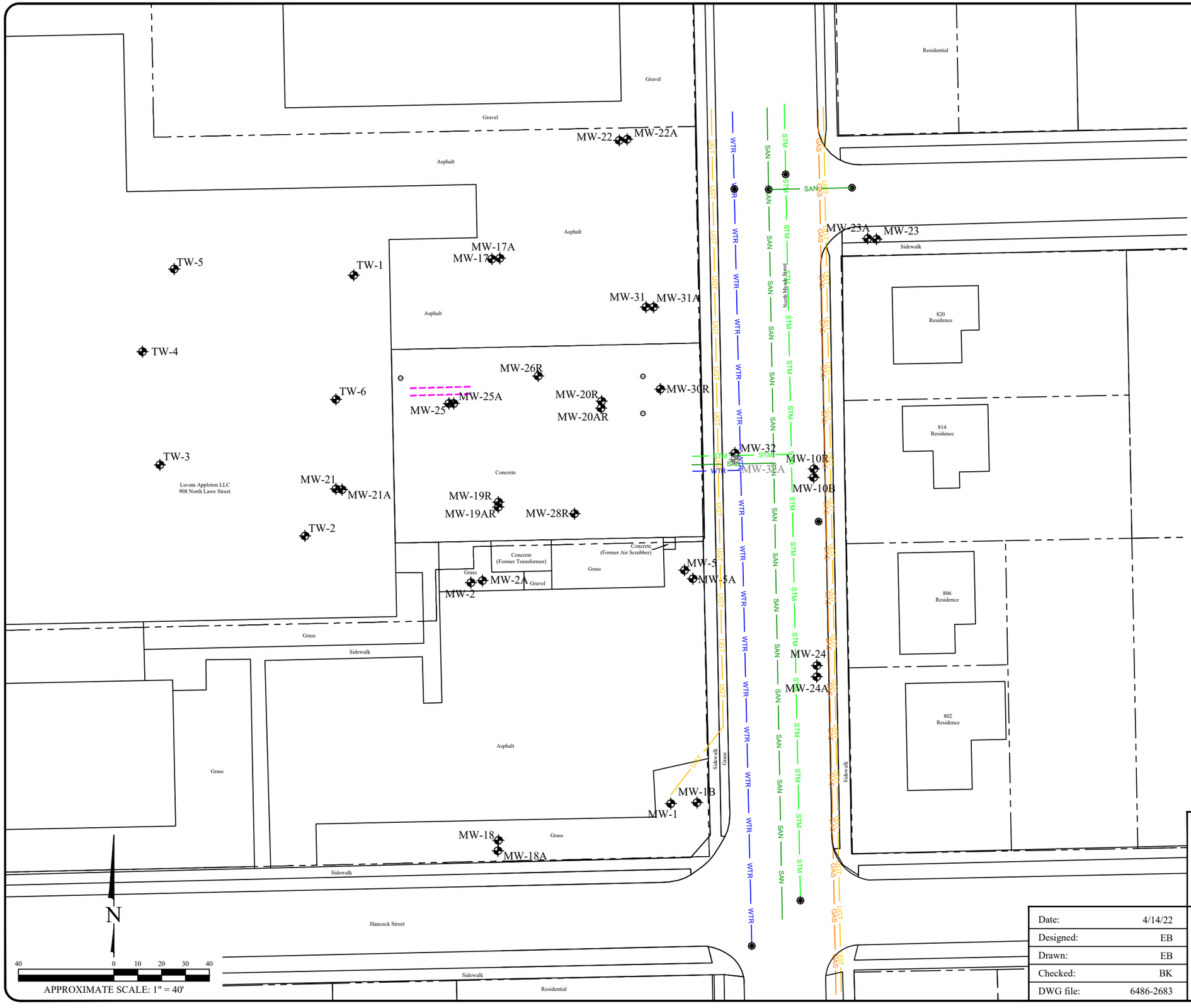
825 North Capitol Avenue • Indianapolis, IN 46204
EnviroForensics.com

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
- FD — 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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EnviroForensics.com

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.).

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

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

D.2
FIGURES

N

20 0 5 10 15 20

APPROXIMATE SCALE: 1" = 20'

Gravel

Gravel

GP-33

GP-34

MW-22A

GP-16

Asphalt

GP-32

B-16

B-15

Asphalt

GP-20

GP-21

GP-22

GP-31

RS-11

RS-12

UB-1

BSS-2

BSS-1

C

BSS-3

Asphalt

GP-30

RS-10

RS-9

RS-8

GP-36/TW-1

A

RS-7

B-10/MW-10

GP-1

MW-25A

BSS-7

BSS-8

BSS-9

GP-29

GP-2

RS-5

RS-6

Concrete

GP-41/TW-6

B

BSS-4

GP-7

GP-13

MW-21A

RS-1

BSS-6

GP-12

BSS-11

BSS-10

Storage

BSS-5

RS-2

RS-3

RS-4

Concrete
(Former Air Scrubber)

Concrete
(Former Transformer)

B-4

Sidewalk

Grass

B-9

MW-10B

North Meade Street

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
- B-1 — Soil boring (STS)
- GP-1 — Soil boring (Badger)
- MW-1 — Monitoring well (STS)
- MW-18 — Monitoring well (McMahon)
- 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
- 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

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

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

Luvata Appleton LLC
908 North Lawe Street

Concrete

Former
No. 1 Wire
Plating Machine

Storage

Basement

Sidewalk

Grass

Concrete
(Former Transformer)

Concrete
(Former Air Scrubber)

Grass

Gravel

Grass

Sidewalk

Asphalt

Appvion, Inc.
714 East Hancock Street

N

30 0 10 20 30

APPROXIMATE SCALE: 1" = 30'

North Meade Street

Sidewalk

820
Residence

814
Residence

806
Residence

802
Residence

Sidewalk

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

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

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

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

State of Wisconsin
Department of Natural Resources
dnr.wi.gov

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (2/14)

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: Appleton Wire (Former)

BRRTS No.: 02-45-000015

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?
		☐ monitoring well ☒ cover/barrier ☐ vapor mitigation system ☐ other:	Condition of the cap described and shown in the Cap Maintenance Plan		○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N

Continuing Obligations Inspection and Maintenance Log

{Click to Add/Edit Image}

Date added:

Title:

{Click to Add/Edit Image}

Date added:

Title: