

June 2, 2021

**VIA EMAIL- (David.Neste@wisconsin.gov)**

Mr. Dave Neste  
Hydrogeologist  
Wisconsin Department of Natural Resources

Re: Reported Contamination at Appleton Wire (Former) - Site 2, 908 N. Lawe Street, Appleton, WI  
BRRTS Case No. 02-45-587658

Dear Mr. Neste:

Our firm represents Albany International in connection with the above matter. This responds to the Department's May 25, 2021 Responsible Party ("RP") letter issued pursuant to Ch. 292.11 Wis. Stats and Chp. NR 700 Wis. Admin. Code.

On May 20, 2021, Albany International issued a request for a liability clarification letter concerning an offsite source of PFAS detections, which are the contaminants of concern addressed in the Department's May 25, 2021 correspondence. Our May 20, 2021 correspondence and its enclosures are incorporated herein by this reference.

For the reasons stated in that submittal, Albany International is not a party that bears responsibility for the discharge of these PFAS substances under Section 292.11(3) Wis. Stats. That is because Albany International neither possesses nor controls the PFAS discharged (Albany International is a former owner of the site) nor did Albany International's operation cause the discharge of the compounds at issue. As such, Albany does not bear responsibility for these compounds under §292.11(3) and indeed is statutorily exempt therefrom pursuant to the operation of § 292.13, Wis. Stats.

Given the forgoing, Albany International will not be submitting a site investigation workplan or undertaking any other investigation or response pursuant to the NR 700 series concerning the compounds that are issue in the May 25, 2021 correspondence and the subject of the above caption BRRTS case number.

Thank you for your attention to this matter.

Very truly yours,

**MICHAEL BEST & FRIEDRICH LLP**



David A. Crass

Cc: Albany International  
EnviroForensics