



September 9, 2021

Mr. David Neste
Wisconsin Department of Natural Resources
625 East County Road Y, Suite No. 700
Oshkosh, WI 54901-9731

Re: Response to Review of Off-Site Liability Exemption Request
Appleton Wire (Former) – Site 2
908 North Lawe Street, Appleton, Wisconsin
BRRTS #: 02-45-587658, 07-45-587874 FID #: 445035910

Dear Mr. Neste:

On behalf of Albany International Corp (Albany), EnviroForensics, LLC (EnviroForensics) submits this response to the Wisconsin Department of Natural Resources' (Department) August 17, 2021, Review of Off-Site Liability Exemption Request letter. The WDNR provided its letter in response to an off-site liability clarification request by Albany regarding the presence of per- and polyfluoroalkyl substances (PFAS) in groundwater at the former Appleton Wire facility located at 908 N. Lawe Street in Appleton, Wisconsin (Site).

The following sections provide the Department's comments and our responses.

WDNR Review

WDNR concluded:

1. Insufficient information has been provided to rule out Albany's current on-site operations as a potential source. More details and information on operations and processes conducted at the Site, as well as details on specific chemicals involved should be presented to rule out current operations as a potential source.

EnviroForensics Response: The statement referring to “current on-site operations” is incorrect. Operations by Appleton Wire, the predecessor of Albany, ceased in 1981. Neither Albany nor Appleton Wire performs any operations at the Site. On June 18, 2021, Luvata, Inc. (Luvata), the current operator of the Site, provided detailed information regarding materials used for its site operations, which is consistent with our understanding of non-PFAS chemical use by Appleton Wire before Luvata acquired the Site.

2. Provide additional data to establish groundwater flow conditions and contaminant fluctuations. Also, provide information as to the distribution of NR 140-compliant wells across the Property and use collected data to develop isoconcentration lines for individual PFAS compounds.

EnviroForensics Response: EnviroForensics previously provided the four (4) attached groundwater flow maps in submittals since implementing remediation in 2019, which included filling in the former basement and removing the groundwater recovery and treatment system. Those maps are attached to this letter for reference and indicate groundwater flow toward the southeast. Other BRRTS sites in the vicinity confirm this flow pattern. EnviroForensics evaluated the PFAS data set to develop isoconcentration maps for individual compounds. There is not a discernable pattern to provide such figures. Our opinion is that the limited data set is insufficient to produce reliable isoconcentration map(s). Be that as it may, the data that is available shows the highest concentrations follow a consistent presence from MW-22 at the northern Site boundary through MW-19R and MW-2 to the south, supporting the conclusion of the existence of an off-site source for which Albany is not responsible.

WDNR Conclusion

The PFAS contamination at the Property must be investigated and remediated, per Wis. Admin. Code chs NR 700-749, under the BRRTS activity number 02-45-587658, as detailed in the Reported Contamination at Appleton Wire (Former) – Site 2 DNR letter dated May 25, 2021 (attached). If you conduct additional investigation of the contamination that clearly demonstrates that the Property does qualify for the Off-Site Liability Exemption, then you can request a letter at that time.

EnviroForensics Response: Albany has made reasonable, good-faith efforts investigating and assessing the potential for PFAS use at the Site. The current data indicates there is not a source on-Site. The compounds detected in groundwater, specifically the relatively high concentrations of PFBA, indicate the PFAS source is unrelated to historical plating operations performed by Albany. According to the National Association of Surface Finishing, the plating industry primarily began its use of PFOS in the 1980s after Appleton Wire ceased operations. Furthermore, the Luvata records do not show PFAS or PFOS use during its operational history. Many of the individual detections at the Site are not source compounds but rather breakdown products from photo-oxidation in the atmosphere, which provides additional evidence for a source originating off-Site or a general background condition. Given the identification of Appvion as a confirmed user of PFAS, it would be irresponsible of Albany to fund these investigative activities



further given that it is statutorily exempt from doing so per § 292.13, Wis. Stats. Until Appvion reports the findings of its investigation, Albany will only continue to pursue closure for the hexavalent chromium release under BRRTS # 02-45-000015.

If you have any questions or require additional information, feel free to contact me at 262-290-4001.

Sincerely,
EnviroForensics, LLC

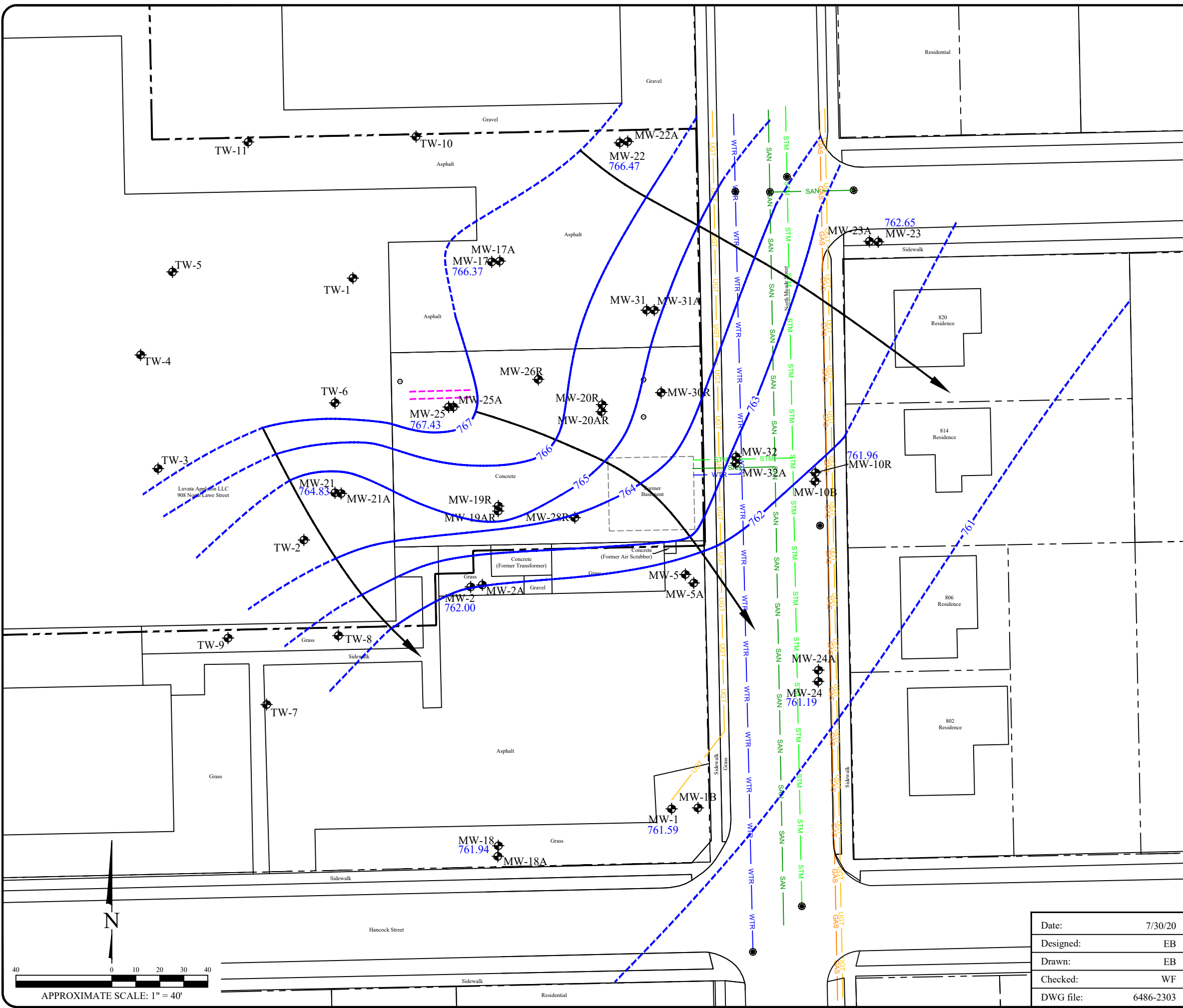
Rob Hoverman, PG
Northern Midwest Regional Director
rhoverman@enviroforensics.com

Attachments

Copy (via email): Joe Gaug, Albany International

Legend

- Property boundary
- GAS Underground gas utility line
- WTR Underground water utility line
- SAN Underground sanitary utility line
- UGT Fiber optics line
- STM Underground storm utility line
- Pipe chase
- Floor drain
- Manhole
- TW-1 Monitoring well
- 764 Groundwater elevation contour
- Dashed boundaries are inferred
- 761.59 Groundwater elevation (feet above mean sea level)
- Approximate groundwater flow direction



DIRECTION OF GROUNDWATER FLOW
JUNE 30, 2020

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

Date:	7/30/20
Designed:	EB
Drawn:	EB
Checked:	WF
DWG file:	6486-2303








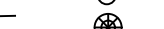



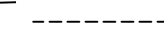




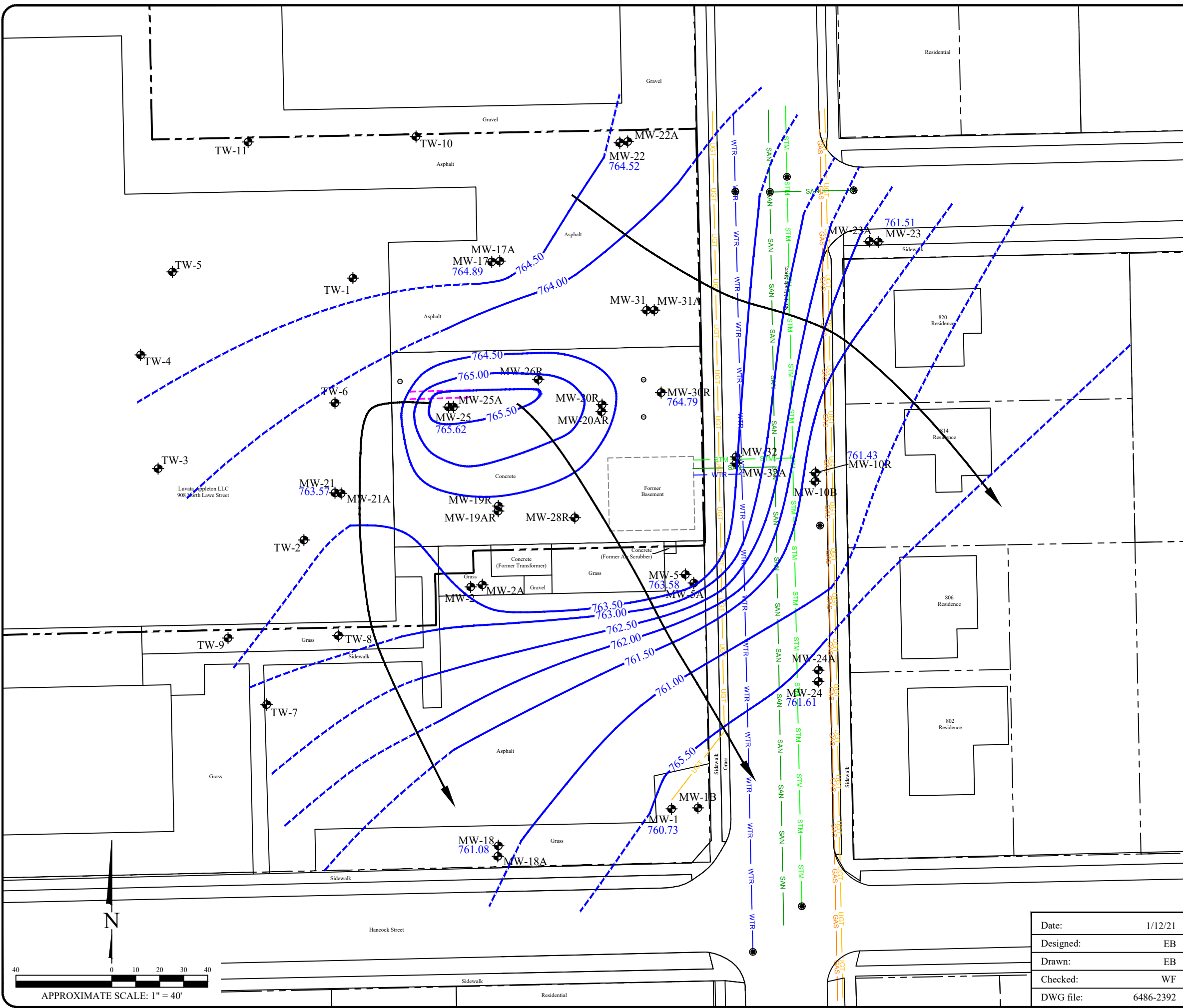
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Figure	1
Project	6486

APPROXIMATE SCALE: 1" = 40'

Legend

-  Property boundary
-  GAS Underground gas utility line
-  WTR Underground water utility line
-  SAN Underground sanitary utility line
-  UGT Fiber optics line
-  STM Underground storm utility line
-  Pipe chase
-  Floor drain
-  Manhole
-  TW-1 Monitoring well
-  763.00 Groundwater elevation contour
-  Dashed boundaries are inferred
-  760.73 Groundwater elevation (feet above mean sea level)
-  Approximate groundwater flow direction



DIRECTION OF GROUNDWATER FLOW
DECEMBER 28, 2020

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



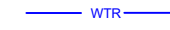

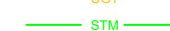








Date:	1/12/21
Designed:	EB
Drawn:	EB
Checked:	WF
DWG file:	6486-2392

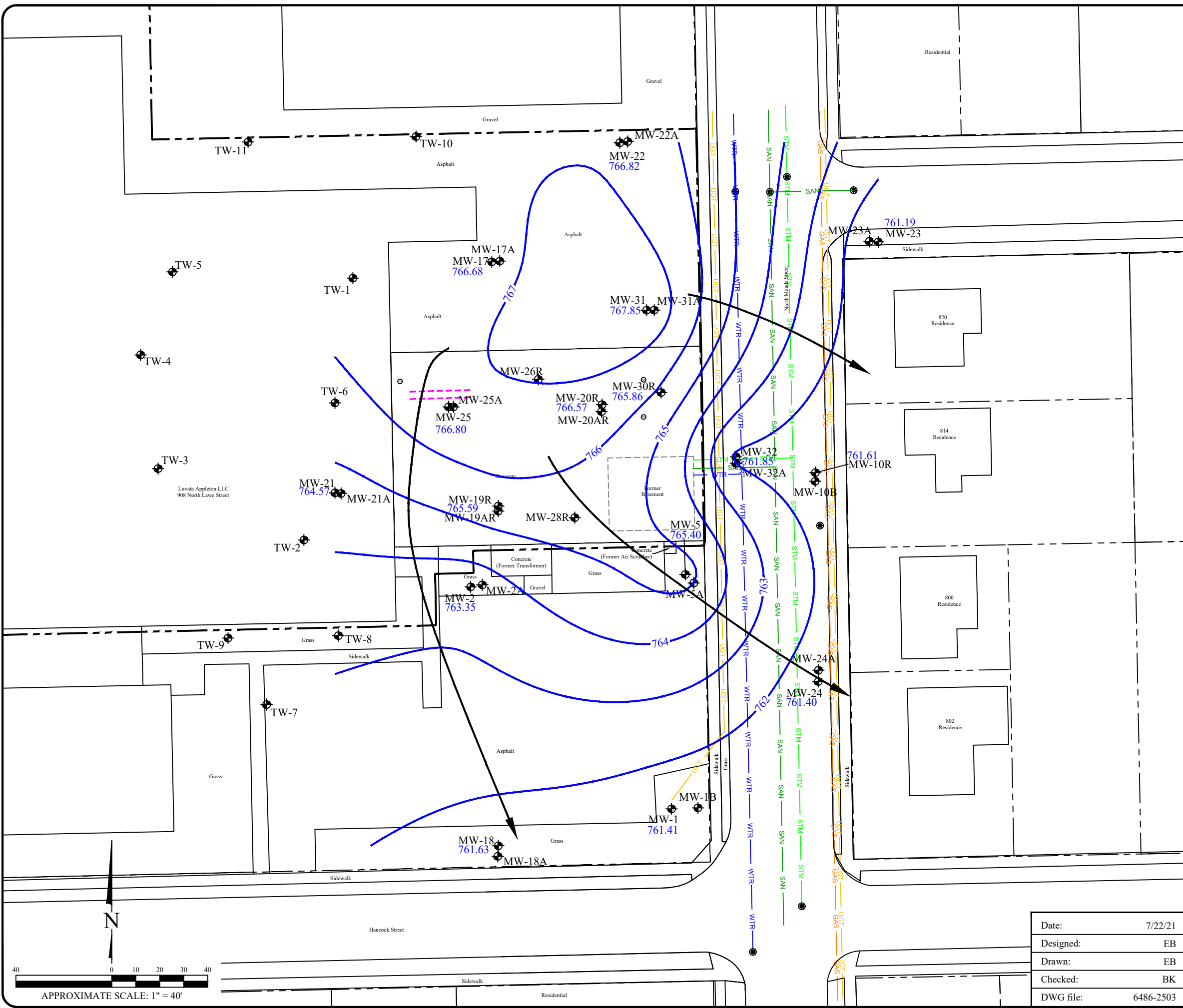


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Figure	3
Project	6486

Legend

-  Property boundary
-  GAS Underground gas utility line
-  WTR Underground water utility line
-  SAN Underground sanitary utility line
-  UGT Fiber optics line
-  STM Underground storm utility line
-  Pipe chase
-  Floor drain
-  Manhole
-  TW-1 Monitoring well
-  764 Groundwater elevation contour
-  761.41 Groundwater elevation (feet above mean sea level)
-  Approximate groundwater flow direction



WATER TABLE CONTOUR MAP
JULY 6, 2021

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

Date:	7/22/21
Designed:	EB
Drawn:	EB
Checked:	BK
DWG file:	6486-2503



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Figure	4
Project	6486

