State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

WISCONSIN
DEPT. OF NATURAL RESOURCES

Scott McCallum, Governor
Darrell Bazzell, Secretary
Scott A. Humrickhouse, Regional Director

West Central Region Headquarters
1300 W. Clairemont Avenue
PO Box 4001
Eau Claire, Wisconsin 54702-4001
Telephone 715-839-3700
FAX 715-839-6076
TTY 715-839-2786

June 29, 2001

Mr. Timothy J. Anderson, Director
Environmental Health & Safety – Global
Rayovac Corporation
601 Rayovac Drive
Madison, WI 53711

Subject: Department of Natural Resources Review and Conditional Approval of the *Phase I Environmental Site Assessment* and *Phase II Subsurface Investigation Work Plan* for the Rayovac Corporation Facility located at 503 Vine Street, Wonewoc, Wisconsin submitted under the Voluntary Party Remediation and Exemption from Liability Statute (s. 292.15, Wis. Stats.)

Dear Mr. Anderson:

The Wisconsin Department of Natural Resources ("the Department") has recently reviewed the *Phase I Environmental Site Assessment* and *Phase II Subsurface Investigation Work Plan* for the Rayovac Corporation facility located at 503 Vine Street, Wonewoc, Wisconsin. You have applied to the Department for the Voluntary Party Liability Exemption under s. 292.15, Wis. Stats., for real property summarily described as a Replat of Lot 1, Certified Survey Map #2259, located in Block 4 of Fisk's Addition and the Southeast Quarter of the Southwest Quarter of Section 26, Block 3 Original Addition and the Northeast Quarter of the Northwest Quarter of Section 35, all in Township 14 North, Range 2 East, Village of Wonewoc, Juneau County, Wisconsin, referred to hereafter as "the Property" (see Juneau County Certified Survey Map #2259 and Surveyor's Certificate and legal description attached hereto and made a part hereof as Attachment A).

The *Phase I Environmental Site Assessment* and *Phase II Subsurface Investigation Work Plan* were prepared by Residuals Management Technology, Inc. ("RMT") on behalf of the Rayovac Corporation for purposes of complying with ss. 292.11(3) and 292.15 (2)(a), Wis. Stats., under the Hazardous Substance Spills statute and Voluntary Party Remediation and Exemption from Liability statute, in response to the potential release of hazardous substances on the Property. Mae Willkom, Hydrogeologist, and Loren A. Brumberg, Waste Management Specialist, in the Department's Remediation & Redevelopment Program, conducted a review of the following reports:

- *Phase I Environmental Site Assessment, Rayovac Corporation, 503 Vine Street, Wonewoc, Wisconsin* prepared by Residuals Management Technology, Inc. and dated May 2001.

- *Phase II Subsurface Investigation Work Plan, Rayovac Corporation, 503 Vine Street, Wonewoc, Wisconsin* prepared by Residuals Management Technology, Inc. and dated May 2001.

Based upon the submitted documents and information obtained during a site visit to the Property on May 10, 2001, the Department has concluded that the environmental site assessment activities for the Property, performed to date, are adequate to identify areas of potential contamination and constitute an adequate Phase I Environmental Site Assessment. The Department has also concluded that the work plan for assessment of these identified areas through the collection and analysis of soil and groundwater samples should be adequate to determine the nature of environmental contamination that may be present on the Property and to identify areas that will require further investigation, and possible remediation, provided that the conditions listed below are satisfied. The Department believes that the conditions listed below are needed to ensure that the Phase II environmental assessment will be adequate and will be conducted in accordance with standard practices.

1.) Provide justification in the Phase II Environmental Site Assessment report where no sampling is recommended at locations where recognized environmental conditions were identified in the Phase I Environmental Site Assessment.

2.) Analytical parameters for environmental media collected at Recognized Environmental Condition #2 should include volatile organic compounds ("VOCs") and semi-volatile organic compounds ("SVOCs").

3.) Analytical parameters for environmental media collected at Recognized Environmental Condition #6 should include petroleum volatile organic compounds ("PVOCs"), naphthalene and diesel range organics ("DRO").

This conditional approval is based solely on information as provided to the Department prior to the date of this letter. The Department may require additional site assessment work on the Property in the event that new information becomes available that indicates to the Department that further site assessment work is needed. After the Phase II Environmental Site Assessment described in the Work Plan is completed in compliance with the three conditions described above, your consultant will need to compile the results into a Phase II Environmental Site Assessment report and submit it to the Department for approval. The next step after the Phase II Environmental Site Assessment will be to conduct a Site Investigation for any areas of concern that are identified in the Phase II Environmental Site Assessment, to define the degree and extent of the contamination in accordance with Chapter 716, Wis. Adm. Code.

If you have any questions or concerns regarding the environmental investigation and cleanup of the Property or the Voluntary Party Liability Exemption Program, please call me at 715-839-3770.

Sincerely,

Loren A. Brumberg

Loren A. Brumberg
Waste Management Specialist
Remediation & Redevelopment Program

LAB:lb

C: Darsi Foss/Michael Prager – RR/3
Linda Meyer – LS/5
BE ~~Bill Evans~~/Mae Willkom – WCR ← To:
Kristopher D. Krause, Residuals Management Technology, Inc., P.O. Box 8923, Madison, WI 53708
William Huebel, Wonewoc Development Corporation, W9354 State Road 33, Wonewoc, WI 53968
Kevin Olson, MSA Professional Services, Inc., 1230 South Boulevard, Baraboo, WI 53913