

State of Vermont
Department of Environmental Conservation
Waste Management & Prevention Division
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(802) 828-1138

AGENCY OF NATURAL RESOURCES

Energizer Holdings, Inc
c/o Steve Buss
401 Gage Street
Bennington, Vermont 05201

August 28, 2025

Notice of Approved Corrective Action Plan for Energizer Degreasing Facility

Energizer Degreasing Facility
401 Gage Street
Bennington, Vermont
SMS Site #2006-3509

Dear Steve Buss:

The Sites Management Section (SMS) reviewed the supplemental Groundwater Corrective Action Plan (CAP), dated February 25, 2025 and revision dated July 16, 2025. The supplemental CAP was prepared by ERM Consulting and Engineering, Inc. for Energizer Degreasing Facility, which is located at 401 Gage Street, Bennington, Vermont. The CAP was prepared for the owner, Energizer Holdings, Inc. The CAP dated July 16, 2025 meets all the requirements of § 35-603 and § 35-606 of the IRULE. Public notice was conducted from July 22, 2025 until August 21, 2025. No comments were received during the public comment period.

Summary of the Nature of Contamination and Components of the Correction Action Plan

Phase I ESA, Site Investigation, and supplemental site investigations have been performed at the Site. Site investigations and Evaluation of Corrective Action Alternatives indicate perchloroethylene (PCE) and perfluorinated and polyfluorinated alkyl substances (PFAS) concentrations are present in groundwater and downgradient of the site exceeding the Vermont Groundwater Enforcement Standards (VGES).

This CAP addresses potential human health risks at the site related to PCE and PFAS in groundwater. The CAP details the combination of long term monitoring and institutional controls to protect human health at the site, which consists of:

- Long term monitoring includes annual monitoring of eight (8) monitoring wells in the shallow aquifer using low flow techniques (ERM-8, ERM-11S, ERM-12, ERM-13, ERM-16, MW-102, MW103, and MW-104), as well as the five compliance points included in the previous CAP.
- Samples will be analyzed for chlorinated ethenes via USEPA Method 8260C and PFAS via USEPA Method 1633 by a certified laboratory and results will be submitted to VTDEC within annual long term monitoring reports.
- Five year reviews of the long term monitoring plan (or more frequently if data permits), will be completed to determine if sampling modifications are necessary.
- A groundwater reclassification order to Class IV (not suitable as a source of potable water) includes the site and potential downgradient receptors, was finalized on November 2, 2021, which prevents the installation of new

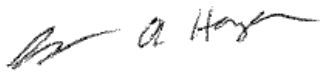
water supply wells. This institutional control serves as an institutional control to protect current and future off-site residents and workers from ingestion of site-impacted groundwater. Additional institutional controls include an institutional control plan for soil and groundwater management for future site activities.

The SMS has determined that the supplemental groundwater Corrective Action Plan for Energizer Degreasing Facility, SMS Site #2006-3509 is **approved for implementation**. The approved Corrective Action Plan must be implemented within 90 days of the date of this approval or based on an approved alternate schedule.

You are required to file this “*Notice of Approved Corrective Action Plan for Energizer*” in the Bennington Land records within 15 days of receipt of this notice. **Please confirm that this was recorded by sending a copy of the book and page number indicating where this document was recorded.**

If I can be of assistance, please contact me at (802) 461-6918 or kristi.herzer@vermont.gov.

Sincerely,



Kristi Herzer, Site Manager
Sites Management Section
Brownfields Response Program

CC:
Kasey Kathan, VT DEC
Aubrey Bayley, ERM
Michael Pettit, ERM
Zachary Reynolds, ERM
Khrista Baran, ERM
Bennington Town Clerk
(all submitted electronically)