



STATE OF WISCONSIN  
DEPARTMENT OF JUSTICE

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December 19, 2005

Jean A. Sage  
W8016 Provimi Road  
Watertown, WI 53098

Re: Watertown Tire Recyclers, LLC

Dear Ms. Sage:

When I met with you and other concerned citizens in Watertown on November 28, we all agreed that you would be the person I should contact with information to be communicated to others in attendance at that meeting. At that meeting, I promised to provide a copy of the attendance list, and I enclose a copy of that list. At that meeting, I also promised to obtain answers to questions regarding operations on the Watertown Tire Recyclers property pursuant to Mr. Springer's collection and transportation license. Specifically, people wanted to know about the Department's monitoring of the site, the number of trailers that may be kept on the site, and the length of time the trailers may stay on the site.

As for monitoring, in addition to the formal inspections that have been regularly conducted since the fire, Department of Natural Resources staff are more frequently taking note of the status of the site as they drive through the area. As explained below, the key provisions of the collection and transportation license relate to the trailers once they are filled with tires.

Under the collection and transportation license, the Springer operation accepts tires from smaller vehicles, transfers them into larger vehicles, and transports them off-site in the larger vehicles, or trailers. The operation can only move tires into the larger trailers that are being filled up with tires to be hauled off-site. There are on the site anywhere from 2 to 5 of these larger trailers that are filling up with tires. Once one of these trailers fills up with tires, the filled trailer must leave the site within 24 hours of its being filled, unless the trailer is leak proof and with an impermeable top. Under the applicable regulations, a tire-filled trailer that is leak proof and with an impermeable top may be kept on-site for a longer period, so long as that period is temporary and does not constitute a permanent storage or disposal scenario.

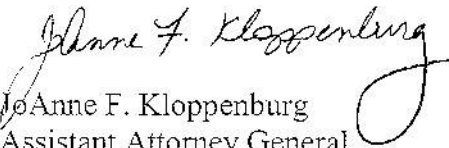
As I noted at the meeting, there were at that time 2 trailers containing tires called by the Department the "Roaster trailers," which the Department has directed Mr. Springer to remove, and which are part of the enforcement referral.

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These answers relate only to what is encompassed by the authority of the Department of Natural Resources under state law. The Department does not regulate trailers per se. There are no Department regulations that restrict the number of trailers that do not have tires in them on this site. You may want to consult the County or Town to see if there are additional provisions that are relevant to your questions about trailers.

Thank you.

Sincerely,

  
JoAnne F. Kloppenburg  
Assistant Attorney General

JFK:drm

Enclosure

c w/o enc.: Pam Kober  
Barb Palecek  
Gene Mitchell