



CON 12-15  
Doc #16357

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CON 12-15 Purethane Facility  
Initials RD

STATE OF IOWA

THOMAS J. VILSACK, GOVERNOR  
SALLY J. PEDERSON, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES  
JEFFREY R. VONK, DIRECTOR

Janaury 31, 2005

Mr. Ronald L Christensen  
Bailey & Christensen Partnership  
122 North Westminster St.  
Iowa City, IA 52245-3834

Larry Bailey  
Bailey & Christensen Partnership  
1716 Baker Ave.  
West Branch, IA 52358-8636

RE: Bailey & Christensen Purethane Building Partnership  
Former West Branch, Iowa Facility (Former Purethane Facility)

Dear Mr. Christensen and Mr. Bailey:

In my letter dated December 8, 2003, to Mr. Robert Brod with Hyde Environmental, Inc., I indicated that sampling of water should be conducted from the city water main that passes through the contaminant plume, if the water line is made of plastic. The April 6, 2004 report on municipal water main sampling from Hyde Environmental, Inc. presents results from sampling of the plastic water line. No evidence of contaminants entering the water line was discovered.

In the December 8, 2003 letter, I stated that if the two additional rounds of sampling, as proposed in the November 2003 Closure Report from Hyde Environmental, Inc., showed stable or improving conditions and no other problems were subsequently identified, we would send out a letter indicating no additional action is required at the Former Purethane Facility. The November 9, 2004 memorandum from Hyde Environmental, Inc. presents a summary of groundwater monitoring results, including the two additional rounds of sampling. Groundwater monitoring results in the November 9, 2004 memorandum support the conclusions of the November 2003 Closure Report.

It is our assessment that there is only a small (primarily on-site) area on the east side of the Former Purethane Facility where contaminants exist in groundwater above the statewide standards for a nonprotected groundwater source (i.e., groundwater that is not likely to be used for water supply due to its low yield potential). The groundwater monitoring results lead us to conclude that ongoing contaminant releases are not occurring and that substantial naturally occurring reduction of contaminant levels is taking place in the original contaminant source area. Therefore, we expect contamination conditions to generally improve with time.

The Iowa Department of Natural Resources (IDNR) concludes that the contamination associated with the Former Purethane Facility poses a low risk to existing and likely future environmental receptors. Therefore, the IDNR does not require further action to address the existing volatile organic compound (VOC) contamination at the Former Purethane Facility. The determination that no further action is required is based on the information available to us at this time, as indicated in the documents cited above. This decision is subject to change should new information become available that indicates substantially different conditions.

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January 31, 2005  
Mr. Christensen and Mr. Bailey

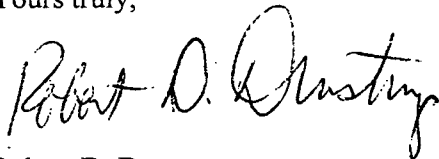
The monitoring wells at the Former Purethane Facility should be abandoned unless there is a plan for their future use and maintenance. We assume that abandonment of the monitoring wells will involve pulling the well casings and filling the holes with bentonite. This method will comply with the department's well abandonment rule 567 IAC 39.8. Please inform us if you would like to use another method. Also please fill out a well abandonment form for each closed well and send it to me. Well abandonment forms can be obtained at the following Internet address:  
<http://www.iowadnr.com/water/wells/index.html>

In the unlikely event that a need for additional action with respect to the existing VOC contamination is deemed necessary in the future, the department will consider the Bailey & Christensen Purethane Building Partnership or its successors to be the party responsible for conducting such action. If the Bailey & Christensen Purethane Building Partnership (or its successors) is no longer viable at such time, the department could require the property owner at that time to conduct additional investigations and develop a cleanup plan. However, per the March 29, 1995 decision No. 305/93-807 by the Supreme Court of Iowa known as "Blue Chip", subsequent property owners will not be liable for the cost of cleanup actions, unless they have contributed to the contamination.

This letter of no further action does not include liability protections that would be available to a limited degree through participation in the Iowa Land Recycling Program (567—Chapter 137, Iowa Administrative Code). This letter also does not constitute a warranty or a representation of any kind to any person as to the environmental condition, marketability, or value of the Former Purethane Facility. Interested parties should contact this department to obtain more information on the environmental conditions assessed at the Former Purethane Facility.

This department commends the Bailey & Christensen Purethane Building Partnership for actions to address contamination at the former Purethane facility. Please contact me at (515) 281-8900 or by e-mail at [bob.drustrup@dnr.state.ia.us](mailto:bob.drustrup@dnr.state.ia.us) if you have any questions or concerns.

Yours truly,



Robert D. Drustrup  
Environmental Engineer  
Contaminated Sites Section

cc: Bill Gardner, Plastic Products Company  
Ty Doermann, City of West Branch  
Bob Brod, Hyde Environmental, Inc.  
Cal Lundberg, Supervisor, Iowa DNR Contaminated Sites Section  
INDR Field Office 6