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**CON 12-15**  
**Doc #17660**

Iowa Department of Natural Resources  
Environmental Protection Division  
Attention: Susan Dixon, Section Supervisor  
Henry A. Wallace Building  
502 East 9<sup>th</sup> Street  
Des Moines, IA 50319-0034

RE: Wilson Concrete Company

Dear Ms. Dixon:

This firm represents Wilson Concrete Company ("Wilson Concrete"). Wilson Concrete operates ready mix concrete facilities in Council Bluffs, Missouri Valley, and Mapleton, Iowa, among other locations, and a concrete product fabrication and ready mix facility in Washington, Iowa.

On May 17, 2000, Wilson Concrete entered into an agreement with Hydro Conduit Corporation of Houston, Texas ("Hydro") to sell the company in a merger transaction. This transaction was substantially completed on or about June 2, 2000. The company will continue to be known as Wilson Concrete Company. In connection with this transaction, Hydro conducted environmental site assessments, including limited soil and groundwater sampling, at Wilson Concrete's Iowa facilities. The purpose of this letter is to report to the Department certain sampling results from the Hydro environmental site assessments. These results are summarized below:

Council Bluffs, Iowa

Wilson Concrete operates a ready mix concrete facility at 1201 South 16<sup>th</sup> Street in Council Bluffs. During its environmental site assessment, Hydro obtained a soil and groundwater sample in the northeast corner of the site near a washout area for ready mix concrete trucks. The laboratory analytical results of the soil sample indicated a concentration of 4.7 mg/kg of arsenic in the soil, but the concentration of arsenic in groundwater was below detection limits. The soil sample was obtained at a depth of 4 to 8 feet, and the groundwater was sampled at an approximate depth of 12 feet below ground surface. The laboratory analytical reports of the soil and groundwater samples (identified as P-1) are attached to this letter as Attachments 1 and 2, respectively.

The ground water sample obtained at P-1 also was analyzed in the field for pH. The result of the field analysis indicated a finding of 12.26 for pH at that location. Wilson Concrete understands that the IDNR does not have regulatory levels for pH in groundwater.

#### Missouri Valley, Iowa.

Wilson Concrete operates a concrete ready mix facility at 116 East Erie Street (Highway 30) in Missouri Valley. During the CSR Hydro environmental site assessment, groundwater samples were obtained at a depth of 12 to 15 feet in three locations, identified as P-1, P-3 and P-4. The sample at P-1 was obtained south of conveyer equipment at the facility; the sample at P-3 was obtained near an above ground storage tank; and the sample at P-4 was obtained along the south portion of a building where there is a storage area of several waste oil drums. The laboratory analytical results for these groundwater samples indicated concentrations of total extractable hydrocarbons-diesel (THE-diesel) of 1500 ug/l at P-1, 3600 ug/l at P-3, and 1200 ug/l at P-4. The analytical reports for these sample results are attached to this letter as Attachments 3, 4 and 5, respectively.

#### Mapleton, Iowa

Wilson Concrete operates a concrete ready mix facility at 600 West Ring Road in Mapleton. The environmental site assessment included analysis of a soil and groundwater sample obtained near the location of a current on-site diesel above ground storage tank and a former, closed petroleum underground storage tank. The laboratory analytical results indicated a concentrations of benzene in soil of 7.9 mg/kg and of ethylbenzene in soil of 27.1 mg/kg at this location (identified as S-1). The analytical results for the groundwater sample (identified as TW-1) showed a benzene concentration of 13 ug/l. The analytical report for the soil sample, which was obtained at a depth of 15 to 20 feet, is attached to this letter as Attachment 6. The analytical report for the groundwater sample, obtained at a depth of approximately 16 feet, is attached to this letter as Attachment 7.

#### Washington, Iowa

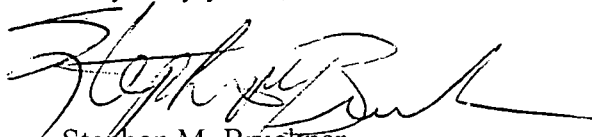
Wilson Concrete operates a concrete ready mix and concrete product fabrication facility at 1027 East 4<sup>th</sup> Street in Washington, Iowa. During the environmental assessment of this site, soil and groundwater samples were obtained in the vicinity of a concrete truck washout area (identified as TW-3) and south of a concrete batch plant in another truck washout area (identified as TW-5). The laboratory analytical results for the soil samples from TW-3 and TW-5 indicated concentrations of arsenic in soil of 3.8 and 4.6 mg/kg, respectively, at those locations. (See Attachments 8 and 9, respectively). Groundwater was not observed while drilling, although soils were logged as wet from 4 to 8 feet below ground surface. One set of laboratory analytical results for the groundwater samples indicated a chromium concentration of 189 ug/l at TW-3 (See Attachment 10) and an arsenic concentration of 64 ug/l at TW-5 (See Attachment 11),

although another set of analytical results for the same sample obtained at TW-5 indicated both chromium and arsenic concentrations were below detection limits at that location. (See Attachment 12).

Groundwater samples from the site also were analyzed for petroleum hydrocarbons. Laboratory analytical results for a groundwater sample from a location identified as TW-2, east of the facility's boiler room, indicated total extractable hydrocarbon-diesel (THE-diesel) concentrations of 58,000 ug/l. (See Attachment 13). A petroleum sheen also was observed on the surface of this groundwater sample location. Analytical reports for groundwater sample at location TW-3 (near a concrete truck washout area) and at TW-5 (also a truck washout area) indicated THE-motor oil concentrations of 1700 ug/l and 2600 ug/l, respectively. (See Attachments 14 and 15).

You may contact the undersigned at the above address or telephone number concerning the conditions described in this letter. This letter is not an admission of any violation of law, and Wilson Concrete reserves all legal rights with respect to these matters.

Very truly yours,



Stephen M. Bruckner  
FOR THE FIRM

SMB/sac  
Enclosures  
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