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Des Moines, Iowa

P.O. Box 3360
Des Moines, Iowa
50316

4140 E. 14th Street
Des Moines, Iowa 50313
Phone: 515-262-5000
Toll-Free: 800-369-5500
Fax: 515-262-4951

CON 12-15
Doc # 22702

April 20, 2010

Mr. Hilton Jackson
Environmental Specialist Senior, Contaminated Sites Section
Iowa Department of Natural Resources
Wallace State Office Building
Des Moines, IA 50319

Subject: Submittal of the Work Plan for Barker Company/Hill Phoenix Facility Located at
703 Franklin Street in Keosauqua Iowa. *in Bureau 6781*

Dear Mr. Jackson:

Seneca Environmental Services is submitting the enclosed work plan on behalf of our client, 703 Franklin LLC per your letter dated March 16, 2010.

If you have any questions regarding the accompanying Work Plan, please call me at 515-261-7723

Sincerely,
Seneca Environmental Services

Blaine Kussatz
Project Manager

cc: Tim McMahon – 703 Franklin LLC
Chuck Becker – Belin McCormick, P. C.
File: Seneca Environmental Services, Des Moines, IA

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Branch Locations

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April 20, 2010

Mr. Hilton Jackson
Environmental Specialist Senior, Contaminated Sites Section
Iowa Department of Natural Resources
Wallace State Office Building
Des Moines, IA 50319

Subject: Submittal of the Work Plan for Barker Company/Hill **Phoenix** Facility Located at
703 Franklin Street in Keosauqua Iowa.

Dear Mr. Jackson:

Seneca Environmental Services is submitting the enclosed work plan on behalf of our client, 703 Franklin LLC per your letter dated March 16, 2010.

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WORK PLAN

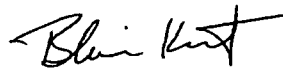
**Barker Company/Hill Phoenix Facility
703 Franklin Street
Keosauqua, Iowa**

Prepared for:

**703 Franklin LLC
703 Franklin Street
Keosauqua, IA 52565**

Prepared by:

**Seneca Companies
4140 NE 14th Street
Des Moines, Iowa 50313**



**Blaine Kussatz
Seneca Project Manager**

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**Work Plan
Barker Company/Hill Phoenix Facility
703 Franklin Street
Keosauqua, Iowa**

Introduction

Scope and purpose

703 Franklin LLC has retained Seneca Environmental Services, Inc. (Seneca) to complete site assessment activities at the above referenced site per the letter dated March 16, 2010 from the Iowa Department of Natural Resources (IDNR). Hill Phoenix purchased the business from Barker Company in 2009. Barker Company, Limited is the current owner of the Property at the present time. The agreement between the Barker Company and Hill Phoenix required Barker Company to sample in the area of the former zinc plating area. The initial investigation was conducted in February 2010 and the results were provided to the IDNR in March 2010. IDNR correspondence dated March 16, 2010 requests that the nature and extent of the contamination be defined, establish the groundwater flow direction and hydraulic conductivity and identify actual and potential receptors. This Work Plan is intended to summarize the nature and scope of the activities that Seneca believes will provide an accurate evaluation of the present risk posed to human health and the environment.

Site History

The subject property is located at 703 Franklin Street in Keosauqua, Iowa. Based on discussions with Jake Syfert, Barker Co./Hill Phoenix, the site was utilized for the Civilian Conservation Corp in the 1930's. Mr. Syfert is unaware of how the property used from the time when the Civilian Conservation Corp left the property until the time Barker Wire occupied the Property. Barker Wire occupied the Property from the mid 1960s to the mid to late 1970s and during that time produced galvanized wire baskets utilizing a zinc plating process to coat the wire baskets. The City of Keosauqua's fire station and city shop were located on the Property from the Late 1970's through the early 1980's. Mr. Syfert recalls an aboveground storage tank on the property but did not know what was stored in it or where it was exactly located. Barker Company took over the property in 1982. Barker Co. shared the Property with the City of Keosauqua for approximately one (1) year. Barker Company did not use zinc at any time during its ownership or operation of the property. At the end of 2009, Hill Phoenix purchased the Barker Company business but has not purchased the Property at this time. A Phase I ESA was completed in October of 2009 by Environmental Technologies Group of Stillwater, Oklahoma. Based on the recommendations of the Phase I ESA, a limited subsurface investigation was completed in January 2010 to evaluate the presence of VOCs, SVOCs, and heavy metals in the soil and groundwater in the former area of the zinc plating process. A Limited Subsurface Investigation Report was submitted to the IDNR in March of 2010.

Current Site Conditions

Site Owner and Usage

The subject property is presently owned by Barker Company, Limited and is operated as Barker Specialty Products by Hill Phoenix. The facility designs and manufactures many lines of

refrigerated, non-refrigerated and hot display cases for the supermarket, convenience store and food service industries.

Proposed Activities

Land Use and Receptor Surveys

Seneca personnel will conduct visual land use surveys and/or personal communication with landowners to determine the nature of activities presently conducted on adjacent properties. Seneca will determine the presence and designated use of water wells and/or surface water bodies within 500 feet of the contaminant source(s) at the Property. Seneca will also request that the Iowa Geological Survey Bureau to complete a one (1)-mile radius water well search utilizing all applicable databases at their disposal.

Soil and Groundwater Plume Definition

The proposed site assessment activities are designed to determine the current risk to human health and environment, if any, posed by the former zinc plating process conducted at the site by defining the soil and groundwater parameters and determining the lateral extents of the contaminant plume migration. The topographic site map suggests that groundwater flow is to the south/southeast for the southern half of the building and northeasterly for the northern half of the building (both towards the Des Moines River). Seven (7) monitoring well locations are proposed to surround the building to evaluate if the contamination is migrating off the Property (Appendix A). Well installation will be accomplished via a truck or trailer mounted hydraulic drill rig equipped with 8.25 inch diameter hollow stem augers. Monitoring wells will be constructed using two (2)-inch diameter Schedule 40 PVC screen and two (2)-inch diameter PVC riser. A sand pack will be set around the well screen and the upper portion of the well will be sealed with bentonite clay. The monitoring wells will be finished as above ground wells with securable flush mounts.

Hydraulic Conductivity Testing

Seneca will perform bail down tests on three (3) wells to determine the hydraulic conductivity of the unconsolidated soils at the site. Monitoring wells with high recharge rates will be tested utilizing an electronic data logger capable of measuring well recovery in very short intervals.

Sampling and Analytical Procedures

Soil samples will be collected using a five (5)-foot core barrel and field screened every twelve (12) inches for volatile organic carbons (VOC) utilizing a photo-ionization detector (PID). A soil sample will be collected at the depth with the highest VOC reading and, if applicable, the depth of previously identified contamination. Soil samples will be packed into a four (4)-ounce glass jar. Groundwater samples will be obtained using clean disposable bailers, poly string, and disposable nitrile gloves. Monitoring well purging and sampling processes were adopted from U.S. EPA protocols for groundwater sampling and monitor well purging. The utilized methodology assures minimum risk of cross-contamination and allows for collection of groundwater that is representative of the surrounding geologic medium. Well purging will consist of three (3) casing volumes or until dry; groundwater will be allowed to recover following purging. Groundwater samples will then be obtained using clean disposable bailers, poly string, and disposable nitrile gloves. Groundwater samples will be visually inspected for the presence of emulsions or chemical sheens. Soil and groundwater samples will then

transferred to laboratory cleaned containers, iced, and shipped to Test America Laboratories, Inc. under full chain of custody (COC) for analysis. VOC concentrations will be determined using Method 8260B, SVOC concentrations by Method 8270 C, Total Extractable Hydrocarbons by Iowa Method OA-2, and the CWA Priority Pollutants Metals by 7060A, 6010B, 7471A, 7091, and 7841.

Special Terms and Conditions

The proposed scope of work is based on the reported results of environmental testing conducted by previous consultants and Seneca at the subject property. The current scope of work will be testing for OA2 hydrocarbon, VOC, SVOCs, and CWA Priority Pollutants Metals.

Data Compilation and Reporting

All data from the sampling activities, along with the historic soil and groundwater data will be compiled and summarized in the Site Assessment Report. The Site Assessment Report is intended to summarize the nature and scope of the contamination remaining at the site and provide the Iowa DNR with an accurate evaluation of the present risk posed to human health and environment by soil and/or groundwater contamination discovered during the Phase I/II site investigations. The reporting stage of the project will be completed subsequent to the soil and groundwater sampling.

Appendix 1
Scaled Site Map/Proposed Boring Location Map

Appendix 2
Topographic Site Map



Seneca Environmental Services	Seneca Job# 6353144	Date: April 19, 2010
Barker Co./Hill Phoenix 703 Franklin Street Keosauqua, IA	Approx. Scale: Unknown	Topo Map