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STATE OF IOWA

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DEPARTMENT OF NATURAL RESOURCES
JEFFREY R. VONK, DIRECTOR

March 1, 2005

Mr. Amrish Mahajan
16540 S. Halsted Street
Harvey, Illinois 60426

Subject: Review of the Phase II Site Assessment Report, Addendum to Site Assessment Report and Response Action Completion Report for the Clarion Hotel site in Davenport, Iowa.

Dear Mr. Mahajan:

The Contaminated Sites Section of the Iowa Department of Natural Resources (IDNR) has reviewed the above-mentioned reports for the Clarion Hotel site in Davenport, Iowa. A general comment common to all reports is presented below, followed by specific comments, conclusions and a recommendation.

General Comment: According to all three reports, soil samples were collected based on field screening using a Photoionization Detector (PID). According to the reports, the PID was calibrated for volatile organic compounds (VOCs), however the main contaminants of concern at the site are semi-volatile organics (SVOCs). Field screening equipment and procedures must match the contaminants of concern, otherwise the sampling results are random and the extent of contamination has not been determined.

To use the PID screening results for SVOCs, proof will have to be provided that the PID would have adequately detected SVOCs, including make and model of PID, PID lamp used, calibration logs, and laboratory sample verification.

Specific Comments:

Response Action Completion Report, Section 4.0 (Site Assessment), Pages 11 and 12: The calculated background standards for Arsenic and Benzo (a) pyrene are incorrect, as samples from the affected area were included. 567 I.A.C. 137.4(2) states that "Background sampling locations shall be outside the influence of any possible contamination associated with release occurring on the property in which the enrolled site is located." Background samples must be collected outside of the affected areas, so as not to be influenced by onsite contamination.

Response Action Completion Report, Section 5.1 (Soil Contamination Risk Evaluation), August 2004 Investigation, Page 16: The first paragraph states that 10 soil samples were collected and analyzed for lead from sample locations GP-15 through GP-24. However, the analytical results on Table 1 in Appendix 2 shows "NA" for lead concentrations for sample locations GP-15, GP-16, GP-21, GP-22, GP-23, and GP-24. Please clarify.

Conclusions: Unless the PID field screening can be verified for use for SVOCs, the horizontal and vertical extent of SVOC soil contamination has not been determined, either onsite or offsite. In addition, the calculated background standards for Arsenic and Benzo (a) pyrene are incorrect and true background

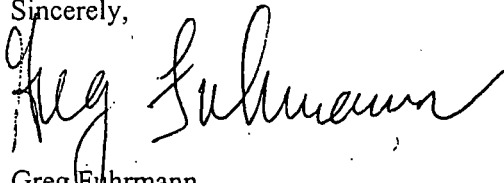
samples will have to be collected and analyzed and a new background standard calculated for each contaminant of concern to be valid.

The source of groundwater contamination appears to be offsite, so no additional groundwater investigative activities are needed. However, because groundwater contamination does flow onto your property, your proposal for a institutional control as presented in Section 5.3.2 of the Response Action Completion Report would be appropriate.

Recommendation. I would suggest that I meet with you and your consultant in person or by conference call and discuss this site. If a No Further Action Certificate is not required, this site could be dealt with under 567 I.A.C. 133, which would not require further sampling and you would receive a "comfort" letter for this site.

Please feel free to call me with any questions at 515/242-5241.

Sincerely,

A handwritten signature in cursive script that reads "Greg Fuhrmann". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Greg Fuhrmann
Geologist
Land Recycling Program
Contaminated Sites Section

cc: Robert L. Mankowski, Environmental Protection Industries
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