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Tami Quam
Superfund Preremedial Coordinator
Iowa Department of Natural Resources
502 E. 9th St.
Des Moines, Iowa 50319-0034

Re: Charles City Lodge No. 1011 Loyal Order of Moose
1116 South Grand Avenue
Charles City, Floyd County, Iowa

Dear Ms. Quam:

I represent the Charles City Lodge No. 1011 Loyal Order of Moose in Charles City, Iowa. This letter is a request for a comfort letter from the IDNR indicating that no further action is necessary on the subject property. Enclosed with this cover letter is the October 1, 2012 Limited Site Investigation for this site (Tab A) and four pages from the EPA's Final Fourth Five-Year Review Report for the LaBounty Site in Charles City (Tab B) for an adjacent site. This EPA report is only provided to show the relative configuration of the LaBounty Site with the subject Moose Lodge Property.

As background, the Lodge has recently sought to sell its lodge at 1116 South Grand Avenue in Charles City, Iowa ("Moose Lodge Property"). The Lodge purchased this property in 1948 and it has been used as a meeting hall since that time. The potential buyer retained Terracon to conduct a Phase I of the property in compliance with ASTM E1527-05. The resulting August 24, 2012 Phase I report concluded that there were a number of recognized environmental conditions associated with the real estate. For your reference, the Moose Lodge is upgradient from and shares a property line with the former NPL-listed LaBounty Site in Charles City, Iowa. The LaBounty Site was deleted from the NPL in 1993 after the LaBounty Site PRP agreed to undertake certain response actions. The LaBounty Site still contains a clay-capped landfill and the LaBounty site is still protected from the infiltration of groundwater with a subsurface diversion wall (partially on the Moose Lodge Site) and includes at least one LaBounty site monitoring well on the Moose Lodge Site property.

In response to the recognized environmental conditions in the Phase I, Terracon was engaged by the potential buyer to conduct a Phase II involving the installation of three new borings or temporary wells and the sampling of an existing well already on the site. That investigation resulted in an October 1, 2012 Limited Site Investigation ("Phase II") report.

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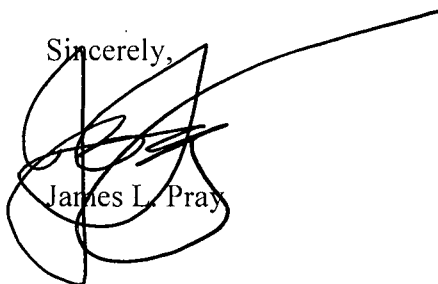
Soil and groundwater samples were obtained from four wells or borings on the Moose Lodge Property. Only one of the borings hit groundwater. The other two borings encountered shallow limestone at approximately five to seven feet below the surface. None of the soil samples were found to contain any contaminants in excess of any action level or IDNR Statewide Standard. Those soil results included Toluene at .0105 mg/kg (the IDNR Statewide Standard is 3.2 mg/kg) in TMW-2. TEH and TEH for waste oil were reported at levels ranging between 20.8 and 26.9 mg/kg in TMW-1, TMW-2, and TMW3 (IDNR Statewide Standard is 3,800 mg/kg). The TEH patterns were described by the Test America lab manager as a "poor chromatographic match" because the patterns were so small. I assume that this is indicative of an old, degraded release.

Groundwater samples were obtained from two wells, one new boring, TMW-1 in the northwest corner of the Moose Lodge property near the road, and an existing LaBounty monitoring well on the north central part of the Moose Lodge property. The sampling of those two wells resulted in no groundwater contamination in the LaBounty monitoring well (M0179R). Acetone and TEH were found in TMW-1. The Acetone contaminated was 10.2 ug/L (Lab RL is 10 ug/L and the IDNR Statewide Standard is 6,300 ug/L) in TMW-1. The laboratory detection limit was 10 ug/L for Acetone. TEH was 2,710 (OA-2 for Motor Oil was 2,280 and for diesel fuel was 431 ug/L) in TMW-1. The statewide standard is 1,200. TMW-1 is directly upgradient from the LaBounty subsurface diversion wall and LaBounty monitoring well M0179R which was non-detect for both Acetone and TEH. TMW-1 is 220 feet downgradient from Charles City Granite Works at 1109 S. Grand Avenue (UST registration No. 198914144) just across the road to the west. It should be noted that no VOCs other than Acetone were discovered in any groundwater. TMW-1 is cross-gradient from the adjacent Comprehensive Systems to the south at 1200 S. Grand Avenue (UST registration No. 198609986).

I believe that a comfort letter is warranted for this site given the following facts:

- The site has already been tested for a number of years due to the presence of the adjacent and downgradient LaBounty Site; and
- Although TEH was found above the IDNR statewide standard, the test results do not show any hydrocarbon chemical constituents in soil or groundwater above any action levels or IDNR statewide standards; and
- The Acetone in the groundwater sample was detected at a level that is barely above the laboratory's detection limit and far below any action level or IDNR statewide standard.

If you have any questions, please let me know. The closing is awaiting a favorable response to this request from the IDNR.

Sincerely,

James L. Pray

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cc: E. Beeny (w/enclosure)
D. Stewart
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