



November 3, 2017

Alice Erland
4067 South Federal Avenue
Mason City, Iowa 50401

CON 12-15
DOC# 33678

Dear Ms. Erland,

This letter is to inform you that the Iowa Department of Natural Resources (Iowa DNR) has completed the review of the Additional Soil and Groundwater Assessment Report for the A1 Security Self Storage facility located at 4067 South Federal Avenue Mason City, Iowa. The Iowa DNR initial review of the Phase II report found evidence of a potentially hazardous condition as defined by Iowa Administrative Code (IAC) 567: Chapter 131. The origin of the contamination was determined to likely be from the historic fuel storage located at the site.

The soil and groundwater samples collected during the October 2017 Additional Soil and Groundwater Assessment were analyzed for the same volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) and the results compared to the Iowa Department of Natural Resources Land Recycling Program Statewide Standards (SWS). The results are summarized below.

The Iowa DNR notes very high PID VOC screening readings on the well log for new monitoring well MW-6. These readings are likely reflective of the benzene and 1, 3, 5-trimethyl-benzene at concentrations of 355ug/L and 136ug/L respectively detected in that monitoring well. Both of these compounds exceed their respective protected groundwater standard of 5ug/L and 70ug/L and also exceeds the non-protected groundwater standard for benzene of 64ug/L.

It was stated in the report that the presumed direction of groundwater flow in the shallow aquifer (which is where the contamination has been detected) is to the northeast. The accumulated contaminant concentration data supports this assumption as the observed concentration of benzene has declined to 355ug/L at MW-6 compared to the presumed source area level of 1,850ug/L of benzene. Although this is an encouraging declining trend, the Iowa DNR in the letter of August 25, 2017 directed you to complete the determination of the extent of the groundwater contamination that was not adequately defined by the sampling conducted during the Phase II assessment. At this time the extent of groundwater contamination down gradient from MW-6 remains undetermined to the level of non-protected groundwater (64ug/L), which is minimum that can be accepted by the Iowa DNR.

Therefore, based on the results of the review discussed above, additional groundwater assessment will again be required north (downgradient) of MW-6 to provide the necessary additional data to characterize the extent of the groundwater contamination at the A 1 Security Self Storage site. As prescribed in Iowa Administrative Code (IAC) 567: Chapter 133, please submit a short amended work plan to the DNR for review and approval within 45 days of receipt of this notification letter.

Review of Risk Evaluation:

The Iowa DNR notes the results and discussion in Section 6.0: Limited Risk Screening, and concurs with the conclusions of incomplete exposure pathways for surface water, soil and vapor intrusion for nonresidential use. The use of the property could be considered if the building were retrofitted with an air handling system to mitigate the potential vapor exposure. Also, based on the Iowa DNR review, it is the determination of the Iowa DNR that there is still a potentially completed exposure pathway to drinking water (the onsite well) at risk from contaminants and the onsite well should either be abandoned in favor of a public water supply or be subject to long-term (annual) monitoring for potential VOC contamination.

Feel free to contact me if there are any questions, comments, or concerns at 1-515-725-8337.

Sincerely,



Matt Culp
Senior Environmental Specialist
Contaminated Sites Section
Iowa Department of Natural Resources

CC: Dave Cleary, Terracon 3105 Capital Way, Suite 5 | Cedar Falls, Iowa 50613
Amie Davidson Section Supervisor Solid Waste and Contaminated Sites Section DNR
Iowa DNR Field Office, Mason city, Iowa