

**CON12-15**
DOC# 36301

AUGUST 6, 2019

Mr. TROY BATZEL
KWIK TRIP, INC.
1626 OAK STREET
PO BOX 2107
La CROSSE, WI 54602-2107

Dear Mr. Batzel,

Thank you for the submittal of the Phase I and Phase II reports for the site investigations conducted on the properties referred to as Proposed Kwik Trip #394 in Marshalltown, Iowa. The Iowa Department of Natural Resources (Iowa DNR) has reviewed the Phase I for historical references and the soil and groundwater data in the Phase II report for evidence suggesting the existence of a hazardous condition, which are required to be reported to the Iowa DNR (567 IAC Chapter 131). The Iowa DNR evaluated the Phase II report along with other generally available information about the properties. Iowa DNR review comments are summarized below.

Multiple volatile organic compounds (VOCs) were detected below the statewide standards (SWS). Specifically, slight exceedance of the SWS for protected groundwater for Benzene (5ug/L) in groundwater at 10.2ug/L and 54.2ug/L were observed at soil boring B-1 and B-2 respectively and an exceedance of SWS for protected groundwater (5ug/L) for TCE (17.5ug/L) was at soil boring B-3. In addition, a risk calculation for potential exposure to indoor air (soil vapor) was conducted by the Iowa DNR utilizing the EPA Vapor Intrusion Screening Level (VISL) model. The highest VOC groundwater contaminant concentrations for the nine observed VOCs listed were screened to produce calculated indoor air concentrations that were then entered into the Iowa DNR Cumulative Risk Calculator (CRC) for potential exposure scenarios to indoor air. The results of that screening indicate that the site passes both the cancer and non-cancer site worker exposure scenario and the residential cancer risk scenario but fails for the residential non-cancer exposure scenario. Since the site is being developed as a gas and convenience store an environmental covenant will not be required to address the failure for potential non-cancer residential soil vapor exposure. However, any consideration of this site in the future for residential use will require this condition be addressed either through remediation, mitigation and/or an environmental covenant.

With consideration of the conditions noted above, it is the determination of the Iowa DNR follow-up action will not be required. This determination should not be construed to mean that a site is contaminant free nor does not constitute an endorsement by the Iowa DNR as to the appropriate proposed use of the property. If such an endorsement is sought, the property may be enrolled in the Iowa DNR Iowa Land Recycling Program (LRP), which would involve additional site investigation and assessment of risks associated with possible uses of the property.

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

Sincerely,



Matt Culp
Contaminated Iowa Department of Natural Resources

CC: Jenifer Harkin, Terracon Consultants, 600 SW 7th St Ste M Des Moines, IA 50309-4508
Amie Davidson, Supervisor, Solid Waste and Contaminated Sites Section Iowa DNR
Iowa DNR Field Office Des Moines, Iowa