

**Re: FW: Marion Lofts- Follow-up**

1 message

**Cook, Dan** <dan.cook@dnr.iowa.gov>

Thu, Oct 24, 2019 at 11:29 AM

To: Sam Rogers &lt;srogers@twgdev.com&gt;

Cc: "Tiedemann, Melissa" &lt;TiedemannMelissa@stanleygroup.com&gt;, John Sullivan &lt;jsullivan@twgdev.com&gt;, Tom Treharne &lt;ttreharne@cityofmarion.org&gt;

Thanks for the information, there are multiple concerns with the 2010 Phase II as noted in the following:

- The data is 9 years old with potentially contaminated soil stored on the western section of the site since the phase II testing.
- The cumulative risk calculator is intended for sites enrolled in the Iowa Land Recycling Program and it was not calculated correctly.
- Bleeker 3 groundwater sample location failed for waste oil.
- Bleeker 3 and Bleeker 5 groundwater sample locations failed for diesel.
- Bleeker 5 was only tested for petroleum products.
- No attempt was made to identify what was stored in the large storage tank noted in REC 4.
- No samples were collected for metals.

And, with VOCs impacting the site a vapor intrusion study will need to be completed. The main vapor concern is for trichloroethylene and 1,2,4-trimethylbenzene.

The Bleeker Property Phase II is a good starting point but additional environmental work is needed to clear the site for residential use. I am available for meetings if you want to discuss further.

Dan

**Daniel Cook** | Environmental Specialist Senior

Iowa Department of Natural Resources

Contaminated Sites Section

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[www.iowadnr.gov](http://www.iowadnr.gov)

On Thu, Oct 24, 2019 at 9:37 AM Sam Rogers <srogers@twgdev.com> wrote:

Dan-

Thank you very much for the response. Below is an excerpt from the Phase II that was performed in September 2010 for the City of Marion showing the areas that were tested on the Bleeker property and the recommendations of the Environmental Consultant.



Below is the conclusions and recommendations from that report.

## 5.0 FINDINGS AND CONCLUSIONS

The results of the Phase II investigation are provided in this document. The findings and conclusions are summarized as follows:

- Benzo[a]pyrene was found above Statewide Standards in Range 1 soil. The cumulative cancer and non-cancer health risk for a site worker and site resident were below regulatory limits.
- No analytes were detected above the Statewide Standards in Range 2 soil.
- Hexachlorobutadiene was found above Statewide Standards in groundwater samples from Bleeker-6. The cumulative cancer and noncancer health risk for a site worker and site resident were below regulatory limits.

## 6.0 RECOMMENDATIONS

One compound was detected in Range 1 soil above the Statewide Standard in the borings at the Bleeker Property. Therefore, this report should be provided to IDNR. However, the cumulative cancer and non-cancer health risks were below regulatory limits. A letter from IDNR stating no action appears warranted should be requested.

It appears that from the image above as it compares to the map you provided, the areas in question (shingle area and machine shop) were tested and were below cumulative cancer and noncancer risk regulatory limits for both a site worker and a site resident. Additionally, the consultant did recommend providing this report to the IDNR for review and a request for a No Further Action Letter. Attached, please find a letter dated November 11, 2011 stating that no follow-up action is required based on the Phase II findings. I also wanted to add some more commentary on the two areas mentioned in the IDNR letter:

Bleeker-2 (soil) – The location of this sample is on land still owned by the City.

Bleeker-6 (groundwater) – While the location of this sample is on our site, that section of the parcel will have 3' of imported fill and will have the concrete parking lot on top of that area.

We feel that adding 2' to 3' feet of soil to the site as well as the concrete pad and parking area of the redevelopment plans will serve as a barrier over any contaminated media that will also mitigate exposure to potential receptors. As such, and based on the findings of the Phase II and the attached letter from the IDNR, it would appear that the site is acceptable to move forward with the development of our project.

Please let me know your thoughts. I am happy to get on a call to discuss.

Thanks,

Sam

Sam Rogers  
Development Director  
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**From:** Cook, Dan <[dan.cook@dnr.iowa.gov](mailto:dan.cook@dnr.iowa.gov)>  
**Sent:** Wednesday, October 23, 2019 11:50 AM  
**To:** Sam Rogers <[srogers@twgdev.com](mailto:srogers@twgdev.com)>  
**Cc:** Tiedemann, Melissa <[TiedemannMelissa@stanleygroup.com](mailto:TiedemannMelissa@stanleygroup.com)>; John Sullivan <[jsullivan@twgdev.com](mailto:jsullivan@twgdev.com)>; Tom Treharne <[ttreharne@cityofmarion.org](mailto:ttreharne@cityofmarion.org)>  
**Subject:** Re: Marion Lofts- Follow-up

Hi Sam

There is no confusion over the site location, I have attached a 2010 aerial image showing mounds of roofing shingles and processed shingles on the property in question. Plus it was the location of the machine shop that processed the shingles. The site will need additional soil and groundwater assessment prior to construction.

I am in the office all day today if you would like to call,

Dan



**Daniel Cook** | Environmental Specialist Senior

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On Wed, Oct 23, 2019 at 9:57 AM Sam Rogers <[srogers@twgdev.com](mailto:srogers@twgdev.com)> wrote:

Dan-

Hope all is well. I have been speaking with Melissa Tiedemann, our Environmental Consultant on our Marion Lofts Project, and from those discussions, I think there may be some confusion about our site boundaries in relation to the testing that has occurred to date and I just wanted to bring those to light for discussion. I have attached a map showing the sites of previous investigation (yellow areas) and how they compare to the site TWG Development, LLC has purchased (red area) and is planning to redevelop as we discussed on the phone. I have also attached a copy of our re-development site plan.

From our discussion a few weeks ago, there were two overall concerns that you had about the site and I wanted to address those as they pertain to the attached maps:

1. **2274 5<sup>th</sup> Avenue (Lacey Property)**– The two northern boring samples (SB-1/MW-1 and SB-2) currently exceed Statewide Standards. As you can see from the attached map, those two borings are outside of the footprint of our property/redevelopment and are part of what the City is using for the right-of-way for the 6<sup>th</sup> Avenue Extension.
2. **2218 5<sup>th</sup> Avenue (Bleeker Property)** – The Phase II ESA called out some potential hazardous materials on the site, however, those materials were identified in the report as being in the northern part of the project and are also contained in the City owned right-of-way.

That said, TWG is committed to the following overall General Development characteristics/procedures:

1. The current site will need approximately 2'-3' of clean fill brought onto the site to match the proposed elevation of the new 6th Avenue currently under development along the north side of the redevelopment site.
2. The proposed development will not have any basements.
3. Sediment excavated for the footings will be sampled and disposed of properly off-site. A soil management plan can be developed for the entire redevelopment, if that is amenable to the Iowa DNR. The area of the former Lacey property is proposed to be the driveway/parking lot for the redevelopment and the areas of concern for the Bleeker property is contained to the north of our project and not onsite.

Please let me know your thoughts. We are ready to proceed with the redevelopment of the site. Please let us know how we can progress with this redevelopment. I am more than happy to get on a call to discuss.

Thank you for your assistance with this important redevelopment project for the City of Marion.

Sincerely,

Sam

Sam Rogers

Development Director

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