



November 25, 2019

CON 12-15  
DOC# 36641

JOHN HOLTGREWE  
GREAT WESTERN CASUALTY COMPANY  
PO BOX 94  
SOUTH SIOUX CITY NE 68776

RE: Review of Supplemental Remedial Action Work Plan for Liquid Fertilizer Spill at Fun Pl and Railroad Intersection, Sioux City, Iowa

Dear Mr. Holtgrewe,

The Iowa Department of Natural Resources Contaminated Sites Section (Iowa DNR) received the Supplemental Remedial Action Work Plan on November 19, 2019 with a request for expedited review. This work plan outlines using oxygen releasing compounds (ORC socks) at the upgradient edge of the contaminant plume coupled with groundwater extraction at MW-2 and MW-3 to increase the radius of influence of the ORC. The intention is to increase conversion of ammonia to nitrate. If this is proven successful, nitrate concentrations in groundwater will be targeted in the next step of remediation.

This work plan is approved. Since this plan includes injections, approval will be required from USEPA Region 7 and the Iowa DNR Water Quality Bureau before the work is initiated. Upcoming submittals include the annual monitoring report due on **January 15, 2020**, a remedial action evaluation due August 15, 2020 and the 2020 annual monitoring report on February 15, 2021. If you have questions or comments please contact me at (515)725-8372 or [shelly.nellesen@dnr.iowa.gov](mailto:shelly.nellesen@dnr.iowa.gov).

Sincerely,

Shelly Nellesen  
Environmental Specialist  
Contaminated Sites Section  
Iowa Department of Natural Resources

Cc: Amie Davidson, Supervisor, Contaminated Sites Section, Iowa DNR  
Iowa DNR Field Office 3, Spencer  
Brian Richardson, GHD Services, Inc., 26850 Haggerty Rd, Farmington Hills, MI 48331



Nellesen, Shelly &lt;shelly.nellesen@dnr.iowa.gov&gt;

**RE: Supplemental Remedial Action Work Plan - Fertilizer spill at intersection of Fun Place and UPRR railroad**

1 message

**Brian.Richardson@ghd.com** <Brian.Richardson@ghd.com>  
To: "Nellesen, Shelly" <shelly.nellesen@dnr.iowa.gov>

Mon, Nov 25, 2019 at 10:41 AM

Thank you Shelly

**From:** Nellesen, Shelly <shelly.nellesen@dnr.iowa.gov>  
**Sent:** Monday, November 25, 2019 10:51 AM  
**To:** Brian Richardson <Brian.Richardson@ghd.com>  
**Cc:** Scott P. Selken <SPSELKEN@up.com>; Thomas Kinney <Tom.Kinney@ghd.com>; Jeffrey Coon <Jeffrey.Coon@ghd.com>; Fruchey, Benjamin <bfruchey@fbmjlaw.com>  
**Subject:** Re: Supplemental Remedial Action Work Plan - Fertilizer spill at intersection of Fun Place and UPRR railroad

Brian,

Thank you for the submittal. This work plan outlines using oxygen releasing compounds (ORC socks) at the upgradient edge of the contaminant plume coupled with groundwater extraction at MW-2 and MW-3 to increase the radius of influence of the ORC. The intention is to increase conversion of ammonia to nitrate. If this is proven successful, nitrate will be targeted in the next step of remediation. The work plan is approved (you will also receive a letter in the mail). Upcoming submittals include the annual monitoring report due on January 15, 2020, a remedial action evaluation due August 15, 2020 and the 2020 annual report will be slightly delayed with a submittal date of February 15, 2021 to allow for data evaluation. Please remember to contact Kurt Hildebrandt (Hildebrandt.Kurt@epa.gov) at the EPA Region 7 and Michael Anderson (michael.anderson@dnr.iowa.gov) with Iowa DNR Water Quality Bureau for approval before injection.

Thanks,



Shelly Nellesen | Environmental Specialist  
Iowa Department of Natural Resources  
P 515-725-8372 | F 515-725-8201 | 502 E. 9th St., Des Moines, IA 50319  
[www.iowadnr.gov](http://www.iowadnr.gov)

On Tue, Nov 19, 2019 at 2:33 PM Brian.Richardson@ghd.com &lt;Brian.Richardson@ghd.com&gt; wrote:

Shelly – please find attached the work plan for supplemental remedial action for the Sioux City Iowa fertilizer spill as discussed last week. Can you please review and comment/approve via email? WE are trying to expedite work before the ground freezes.

Call me with any questions (mobile # is best) using the numbers provided below.

Best Regards,

Brian Richardson LG (WA) RG (OR)  
**GHD**

T: +1 248 893 3400 | M: +1 360 831 1167 | E: brian.richardson@ghd.com  
26850 Haggerty Road Farmington Hills MI 48331USA | www.ghd.com

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From: Nellesen, Shelly <shelly.nellesen@dnr.iowa.gov>  
Sent: Monday, April 1, 2019 2:26 PM  
To: Brian Richardson <Brian.Richardson@ghd.com>  
Subject: Re: report transmitted

Got it. Thanks Brian!



Shelly Nellesen | Contaminated Sites  
Iowa Department of Natural Resources  
P 515-725-8372 | F 515-725-8201 | 502 E. 9th St., Des Moines, IA 50319  
www.iowadnr.gov

On Mon, Apr 1, 2019 at 12:27 PM Brian.Richardson@ghd.com <Brian.Richardson@ghd.com> wrote:

Shelly – I sent the report about 15 minutes ago. Let me know if you have not received it yet. We will be shipping two hard copies to you as well.

Brian Richardson LG (WA) RG (OR)  
**GHD**

T: +1 248 893 3400 | M: +1 360 831 1167 | E: brian.richardson@ghd.com  
26850 Haggerty Road Farmington Hills MI 48331USA | www.ghd.com

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