



June 22, 2020

Larry Joe Detterman
619 17th Avenue North
Clinton, Iowa 52733

Regarding: Phase II Environmental Assessment of 1525 12th Av. South and 1530 13th Av. South, Clinton, Iowa

Dear Mr. Detterman,

Thank you for the submittal of the Phase I and Phase II reports for the site investigation conducted on the two properties referenced above. The Iowa Department of Natural Resources (Iowa DNR) has reviewed the Phase I report regarding the history of the properties and the soil and groundwater data contained in the Phase II report for evidence suggesting the existence of a hazardous condition. Hazardous conditions 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. The Department's review comments for both properties are summarized below.

1525 12th Avenue South

- Soil:

Lead and Arsenic were detected in soil above regulatory standards. Specifically, lead was detected in soil at 1,180mg/kg. This concentration exceeds the soil standard of 400 mg/kg. Arsenic was also detected in soil at all three sample locations. The maximum arsenic concentration was 8.92 mg/kg. This concentration exceeds the soil standard of 1.9 mg/kg. However, naturally occurring arsenic does occur in the Clinton area at a concentration from 10 to 11 mg/kg which would indicate the concentrations seen on the site are typical of natural levels. However, background soil sampling for arsenic was not conducted for comparison.

Petroleum (as waste oil) was detected in soil at each of the three sample location at concentrations below regulatory standards. However, the fact that waste oil was detected at all three sample locations indicates a potential site-wide presence of waste oil contamination in shallow soil.

- Groundwater

As with soil, petroleum (as diesel fuel), lead and arsenic were also detected in groundwater at concentrations that exceed the regulatory standards. Although contaminated, the shallow groundwater in the vicinity of the site is not used as a source of drinking water and the city has an ordinance prohibiting use of private wells within the city limits so the potential exposure to contaminated groundwater is not considered a potential public health concern.

1530 13th Avenue South

Similar soil and groundwater conditions were detected at this property. Petroleum (as waste oil) was detected in soil at all three sample locations. Arsenic was also detected in soil and groundwater above the regulatory standards and lead was detected above the regulatory standard in groundwater.

Summary:

The shallow groundwater in the vicinity of both of these sites is not used as a source of drinking water and the city has an ordinance prohibiting use of private wells within the city limits so the potential exposure to contaminated groundwater is not considered a potential public health concern. Therefore, remediation of groundwater will be deferred due to lack of potential receptors (wells).

Both properties have contamination in soil that exceed regulatory standards. The Iowa DNR is also aware that both sites are being considered for potential acquisition by the City of Clinton financed with a grant from FEMA for flood mitigation (green space) that will prohibit future development. Since green space is often used by the public as unauthorized recreational space, additional soil testing and disposal of contaminated shallow soil (0-2 ft.) will be required due to contamination from petroleum, lead and arsenic in excess of regulatory standards.

Please contact me if you have any questions at 1-515-725-8337 (office) or 515-822-1732 (cell)

Regards

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