



JUNE29, 2020

NOEL ANDERSON
PLANNING & ZONING DIRECTOR
CITY OF WATERLOO
715 MULBERRY STREET
WATERLOO, IOWA, 50703

Regarding: Environmental Assessment of former Weissman Steel Site Falls Road, Waterloo.

Dear Mr. Anderson,

This letter is to inform you that the Iowa DNR Contaminated Sites Section has completed review of the Phase II reports conducted by HR Green (2019) and Terracon (2020) for the site referenced above. The results of the Phase II reports confirm metals (lead, arsenic and chromium) contamination in soil above EPA health-based screening benchmarks and/or Iowa Statewide Standards (SWS) In addition, PCBs and several semi-volatile organic compounds (PAHs) have also been detected below SWS.

It is the determination of the Iowa DNR that this contamination is a result of past metal recycling operations by Weissman Steel and some restrictions of future use of the property will be required. The site should not be considered for residential use. To prevent this from occurring an environmental covenant should be placed on the entire property prior to development documenting the contamination and prohibiting any form of residential development.

However, the level of soil contamination at the site does not preclude development for commercial or industrial use providing precautions are taken to prevent the disturbance and spreading of contaminated soil to uncontaminated areas of the site. To address this concern, the Iowa DNR will also require the development of a Soil Management Plan (SMP). Under this plan the developer must describe the plan to monitor, test and if necessary the excavation, remove and properly dispose of any soil contaminated above predetermined soil standards that are first reviewed and approved by the Iowa DNR prior to implementation of the SMP. As part of the review of the Phase II reports a health risk calculation was also conducted using the concentrations of the contaminants already documented on the site. The results indicted the non-cancer risk for site workers and construction workers exposure scenarios to contaminated soil were unacceptable. Therefore, worker protection from exposure to contaminated soil should also be address in the SMP.

Please contact me at 1-515-725-8337 if you have any questions

Regards

A handwritten signature in black ink, appearing to read "Matt Clegg". The signature is written in a cursive, flowing style.

CC: Michelle Sweeney, AECOM Technical Services, Inc. 501 Sycamore Street Suite 222 Waterloo, IA 50703
Dave Cleary, Terracon Consultants, 3105 Capital Way Suite 5, Cedar Falls, IA 50613
Rose Amundson HR Green, Inc., 10 Earhart Lane SW, Cedar Rapids, IA 52404
Iowa DNR Field Office, Manchester, Iowa