



September 16, 2020

Bill Carrig,
Stanley Consultants
2658 Crosspark Road
Unit 100
Coralville, Iowa 52241

Dear Mr. Carrig

This letter is to inform you that the Iowa Department of Natural Resources (Iowa DNR) has completed the review of the Phase I and Phase II Environmental Site Assessment reports for the McKee Button factory site located at 1000 Hershey Avenue in Muscatine, Iowa. The Iowa DNR reviewed the reports for evidence of a hazardous condition as defined by Iowa Administrative Code (IAC) 567: Chapter 131. The result of that review has identified evidence of soil and groundwater contamination representing a potential hazardous condition.

Soil and groundwater samples collected during the Phase II were analyzed for metals, VOCs and SVOC and PCBs. and the results compared to the Iowa Department of Natural Resources Land Recycling Program Statewide Standards (SWS). The results are summarized below.

Soil Results:

Metals were detected in soil samples collected from every sample location. The only compound that exceeded statewide standards was arsenic. The samples that exceeded the SWS of 1.9 mg/kg were at soil sample location BH1 and BH3. However samples from locations BH2 and BH5 had MDLs above the SWS. These samples are considered exceedances because the MDLs exceed the Iowa DNR SWS. As such, additional neutral (off site) location background soil samples will be required for comparison to the detected levels. SVOCs were generally not detected in soil with the exception of sample location BH2 which had multiple significantly elevated detects of PAH compounds the exceed the SWS for soil. **Additional sampling of soil in the vicinity of boring BH2 will be required to determine the extent of soil contamination.**

Groundwater Results:

Extremely elevated levels of several metals were detected in groundwater that exceed the SWS for protected groundwater. It is the understanding of Iowa DNR that the groundwater samples for metals contained significant sediment which required dilution and re-acidification prior to analysis. **The Iowa DNR will require resampling of the groundwater for metals. To control sediment interference, the new samples should be filtered in the field to remove sediment in order to determine the actual dissolved metals concentrations for evaluation.**


VOC and Semi-Volatile Organic Compounds:

The Iowa DNR noted in the Phase II report that some VOCs and all SVOCs in groundwater were reported as non-detects. However, these detections were based on MDLs that were higher than the SWS concentrations used for evaluating groundwater. As such the Iowa DNR cannot make a determination regarding VOC and SVOC impacts in groundwater at this site based on the data provided. It is the understanding of the Iowa DNR that the reason for the MDLs is because a lab method 8270E, as administered, could not attain MDLs low enough for comparison to SWS. **Therefore, the Iowa DNR will require that groundwater be resampled for VOC and SVOCs and that the samples be analyzed by a method(s) capable of a better comparison of SWS to field concentrations.**

Based on the results discussed above, additional soil and groundwater assessment is required at the McKee Button site. The additional assessment will provide the necessary additional data to characterize the extent of the soil and groundwater contamination.

Feel free to contact me if there are any questions at 1-515-725-8337 or 1-515-255-4699.

Sincerely,



Matt Culp
Senior Environmental Specialist
Contaminated Sites Section
Iowa Department of Natural Resources

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