



FEBRUARY 9, 2021

Will Anderson  
River Point West, LLC,  
233 Park Avenue South, Suite 201,  
Minneapolis, MN 55415-1132

Regarding: Environmental Assessment Gray's Landing Parcel F, located at the SW Corner of Tuttle Street and SW 11th Street, Des Moines, Iowa

Dear Mr. Anderson,

Thank you for the submittal of the Phase I and Phase II Site Investigation report conducted by Terracon Environmental for the property referenced above. The Phase II soil and groundwater data was reviewed along with current and historic information about the property for potential sources of contamination and sensitive receptors in the vicinity that might constitute a hazardous condition (as defined in 567 Iowa Administrative Code (IAC) Chapter 131. A Soil and Groundwater Management Plan (SGWMP) has also been submitted to the Iowa DNR for review. The plan describes how soil and groundwater contamination will be addressed in the event that it is encountered during re-development.

A summary of the contamination detected on Parcel F includes:

**Arsenic in Soil:**

Elevated arsenic was detected in soil and the maximum arsenic soil concentration was 78.4 mg/kg. That concentration exceeds the statewide standard and was used to conduct a risk calculation by the Iowa DNR. The resulting risk calculation determined that based on that concentration, the site failed for the cancer and non-cancer risk for the residential soil exposure scenario. However, it passed for the site worker and site construction worker exposure scenarios. The arsenic in soil has been attributed to either past weed control along the RR right-of-way or from the former Pitt Des Moines Steel site that previously occupied this site and was closed under the Iowa LRP.

**Diesel Fuel in Groundwater:**

The maximum groundwater contamination from diesel fuel was 132,000ug/L. That concentration exceeds the statewide standard for both protected groundwater of 2,200ug/L and the non-protected groundwater standard of 44,000ug/L as well as the UST/LUST program Tier 1 standard of 75,000ug/L for contaminated ground water to water line. This contamination has also been attributed to the former Pitt Des Moines Steel site that previously occupied this site and was closed under the Iowa LRP.

Due to the aforementioned detection of arsenic and diesel fuel, the Iowa DNR will require the submittal of a final SGWMP Implementation Report upon completion of the site redevelopment that describes observations during site work and what corrective action(s) (if any) that were necessary during site development.

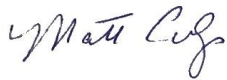
It is also noted that that a former 12 inch water main transverses the site. As such, future buried public utilities related to development (water lines etc.) in this area should try to observe the established Iowa DNR separation distance from sources of contamination (both soil and groundwater) and if necessary, the use of petroleum-resistant gaskets and/or non-gasket water line construction.

It is the opinion of the Iowa DNR that the contamination observed on parcel F is likely the result of past activity at the former Pitt/Des Moines Steel facility. That facility was assessed and remediated and issued No Further Action Certificate under the Iowa DNR Land Recycling Program in July 2013. Although contamination from arsenic in soil and diesel fuel in groundwater were detected on Parcel F in excess of screening standards, the Iowa Department of Natural Resources (Iowa DNR) has not found evidence suggesting the existence of a hazardous condition, and therefore will defer further assessment.

The decision to defer further assessment is based on currently available information provided in the Phase I and Phase II and historic data from the Pitt Des Moines site. This means that the Iowa DNR could require re-evaluation the site if new information or soil and groundwater data is received that warrants further investigation. The Iowa DNR also does not offer an opinion as to the appropriate use of Parcel F. If such an endorsement is sought, the property may be enrolled in the Iowa Land Recycling Program (LRP), which would involve further investigation and assessment of risk associated with possible uses of the property.

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

cc: Mike Sullivan, Supervisor, Contaminated Sites and Solid Waste Section Iowa DNR  
Bob Lund of River Point West, LLC 233 Park Avenue South, Suite 201, Minneapolis, MN 55415-1132  
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