



October 11, 2021

ALAN RESNIK
DIRECTOR CORPORATE ENVIRONMENTAL MANAGEMENT
CUMMINS INC
500 JACKSON ST
COLUMBUS IN 47201

RE: Review of Statistical Analysis of Groundwater Concentrations – Cummins Filtration, Lake Mills, Iowa

Dear Mr. Resnik,

The Iowa Department of Natural Resources Contaminated Sites Section (Iowa DNR) has reviewed the Report of Statistical Analysis of Groundwater Concentrations for the Land Recycling Program (LRP) site, Cummins Filtration in Lake Mills. The report was received September 24, 2021.

Eight quarters of compliance groundwater monitoring were analyzed to discover existing trends. Mann-Kendall statistical analysis was performed on the groundwater concentrations. Generally, the plume was found to be steady or declining in concentration. One exception was the vinyl chloride concentrations at MW-20, which were trending up. This is expected to continue as the chlorinated solvents breakdown from trichloroethylene to vinyl chloride in the source area.

The draft Environmental Covenant (EC) has been submitted and is being reviewed for legal and technical accuracies. A public notice will be put in the local newspaper, letting the community know the site specifics issues and what has been done to address the risks. Once the public notice period has ended and all public comments have been addressed, the EC can be signed by all parties and recorded with the County. Once all monitoring and protective actions have occurred, a Final Report outlining all past actions should be submitted to the Iowa DNR for review. Once accepted, the site can move forward to obtaining the No Further Action Certificate (NFA).

I will be in contact with your consultant as the process moves forward. If you have questions or concerns please contact me at shelly.nellesen@dnr.iowa.gov or (515)669-5494.

Sincerely,

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

Cc: Michael Sullivan, Supervisor, Solid Waste & Contaminated Sites Section, Iowa DNR
Richard Volpi, Haley & Aldrich, 6500 Rockside Rd., Suite 200, Cleveland, OH 44131

