

November 19, 2021

Mr. Matt Culp
Solid Waste and Contamination Sites Section
Iowa Department of Natural Resources
502 E. 9th Street
Des Moines, Iowa 50319

Submitted via email: matt.culp@dnr.iowa.gov

**RE: Work Plan for Limited Phase II Environmental Site Assessment
Western Part of John Grieder Motors
South of 13th Street
Belle Plaine, Iowa 52208**

Dear Mr. Culp,

Environmental Works, Inc. (EWI), on behalf of The Overland Group, LLC, is submitting the enclosed Work Plan for the above-referenced Site for your review and comment. The Work Plan outlines the proposed investigation activities for further assessment as requested by the Iowa Department of Natural Resources (IDNR) in their letter dated January 25, 2021. EWI intends to submit the final Limited Phase II ESA report to the IDNR for review with request for a "Deferral Letter" stating additional investigation will not be required at the Site, if the results are favorable.

The objective of the investigation is to evaluate the presence and extent of impacts to soil and groundwater related to the following findings from the August 2021 Phase I ESA.

- A LSI was completed on the Site and east adjoining property (John Grieder Motors property) in June 2020 which identified petroleum impacts to soil and groundwater on the subject property. The potential source of contamination was identified as a historical retail petroleum facility present 50-feet north and cross to up-gradient of the Site from at least 1949 to 1985.
- Following review of the June 2020 LSI, IDNR concluded further assessment should be conducted if and when a decision is made to develop the west part of the Grieder property (Site) and until then, no further assessment was required.
- Additionally, a railroad spur and a portion of an apparent railroad yard are visible on the east portion of the Site from at least 1936 to 1968. The use of the Site as a railroad yard including the potential transportation and/or storage of petroleum products and hazardous substances has not been evaluated.

The Limited Phase II ESA will be performed in general accordance with accepted and established practices including in general accordance with the ASTM Standard Practices for Environmental Site Assessments: Phase II ESA Process: E1903-19. EWI's approach to the project including the sampling locations, frequency, depth, chemical analysis and rationale includes the following:

- The advancement of seven (7) soil borings to approximately 20 feet below ground surface (bgs) is planned. At each of the boring locations, continuous soil cores will be collected with a Geoprobe® direct-push apparatus and Macro-Core or Dual-Tube soil sampler fitted with disposable polyvinyl chloride (PVC) sleeves. The soil cores will be screened for volatile organic compounds (VOCs) with a photoionization detector (PID). All soil cores will be logged and visually



examined to document the presence or absence of suspect contamination and rationale for sample collection. Lithology and soil characteristics will be recorded on boring logs.

- The installation of seven (7) temporary groundwater wells for sample collection is planned. The temporary wells will be co-located with the soil boring locations. The temporary wells will be advanced to shallow groundwater, which is anticipated to be above 20 feet bgs. Static water level measurements will be obtained from the temporary casings prior to the collection of the groundwater samples. Dedicated, disposable polyethylene tubing fitted with check valve or dedicated tubing connected to a peristaltic pump will be utilized to obtain the groundwater samples.
- A map showing the proposed soil boring and temporary groundwater well locations is attached.
- Seven (7) soil samples and seven (7) groundwater samples will be collected for laboratory analysis. Additionally, one trip blank will be analyzed for VOCs. Soil samples will be collected from intervals exhibiting the highest field screening results (PID screening, visual observations, and sampler judgment). If no contamination is indicated, the soil samples will be collected based on sampler judgment or from the interval just above the saturation zone/the bottom of the borings. If no water is encountered in the temporary groundwater wells, an additional soil sample will be collected for laboratory analysis from the bottom of the boring. Samples will be analyzed for the following: VOC by EPA Method 8260, total extractable hydrocarbons (TEH) by Iowa Method OA-2, polycyclic aromatic hydrocarbons (PAH) by EPA Method 8270 SIM, and RCRA 8 metals by EPA Method 6010/7471B.
- EWI will prepare a Limited Phase II ESA report summarizing the site conditions, screening values, lithology, sampling protocols and procedures, and analytical results compared to IDNR standards. A map indicating sampling locations, boring logs and photographic documentation will be presented in the report. A copy of the subcontracted analytical report and Chain of Custody documentation will also be included in the report.

EWI appreciates IDNR's review of this Work Plan prior to the field investigation and thank you in advance for your assistance. Should you have questions or like to discuss our proposed approach to the project, please contact me at (913) 299-5709.

Sincerely,



Ms. Gracie Tiffany
Operations Manager-Due Diligence

Attachment – Proposed Sampling Locations Map
January 25, 2021, Letter from INDR to Bell Automotive Properties LLC



<p>NORTH</p>	<p>CHECKED BY: G. TIFFANY</p>	<p>SCALE IN FEET</p> <p>0 50 100</p> <p>APPROXIMATE</p>	<p>ENVIRONMENTAL WORKS</p>	<p>Kansas City Location: 1731 Locust Street Kansas City, MO 64108 Phone: (816) 285-8410</p>	<p>PROPOSED SAMPLE LOCATIONS</p>	<p>FIGURE</p> <p>1</p>
	<p>NOV. 2021</p>				<p>WORK PLAN - LIMITED PHASE II ESA WESTERN PART OF JOHN GRIEDER MOTORS BELLE PLAINE, BENTON COUNTY, IOWA</p>	



January 25, 2021

Via Email (jonbell@jonbell.com)

JON BELL
BELL AUTOMOTIVE PROPERTIES LLC
2835 ROSEBAY CT
CEDAR RAPIDS IA 52411-4701

SUBJECT: Limited Site Investigation – John Grieder Motors, 409 13th Street, Belle Plaine, Iowa

Dear Mr. Bell:

This letter is in response to receipt of a Phase 1 Environmental Site Assessment (Phase 1) and Limited Site Investigation (LSI) reports for the referenced property were received by the Department of Natural Resources (DNR) Underground Storage Tank Section on January 14, 2021. Thank you for the submittals.

Underground storage tank (UST) regulations are found in Iowa Administrative Code [IAC] 567.135, Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks. These UST regulations are managed by the DNR UST Section. They specifically cover assessment, monitoring, and cleanup of contamination resulting from releases from regulated UST systems and have established target levels (Tier 1) for benzene, toluene, ethylbenzene, xylenes and total extractable hydrocarbons as diesel and waste oil. Chapter 567.135 regulations do not cover spills or releases from above ground storage (e.g. barrels, above ground storage tanks) or other site activities not directly related to releases from UST systems, which may be covered under other regulations managed by the DNR Contaminated Sites Section.

The April 2020 Phase 1 identified multiple Recognized Environmental Conditions (RECs) including, but not limited to, a former filling station (former Gryp Oil, UST 198600805) located across 13th Street to the north of the referenced property at 402 13th Street in Belle Plaine. DNR Records for UST 198600805 indicate two registered gasoline underground storage tanks were filled with inert material in June 1985.

The June 2020 LSI indicated the former Gryp Oil property is in a presumed cross-gradient location to the subject property. Soil and groundwater sampling were conducted at B3/TMW3 installed on the west side of the Grieder Motors property, northwest of a “machine shed” on subject property and approximately 50 feet south of the former Gryp Oil property.

Soil results for B3 found detectable concentrations of volatile organic compounds (VOCs) including ethylbenzene and xylenes but concentrations were below Tier 1 levels. Gasoline was also detected in the B3 soil sample; however, there is currently no Tier 1 or statewide standard for total extractable hydrocarbons as gasoline in soil. Detectable concentrations of total extractable hydrocarbons as diesel and waste oil were not identified.

Groundwater results for TMW3 show detectable concentrations of benzene and ethylbenzene above Tier 1 levels; toluene and xylenes were detected below Tier 1 levels. The benzene and ethylbenzene concentrations detected in the TMW3 sample exceed the Tier 1 level for groundwater ingestion- actual (drinking water wells). Gasoline was also detected in the TMW3 groundwater sample; however, there is currently no Tier 1 or statewide standard for total extractable hydrocarbons as gasoline in groundwater. The total extractable hydrocarbons as diesel and waste oil concentrations at TMW3 were below detection limits and Tier 1 levels.

John Grieder Motors

January 25, 2021

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As noted in the January 13th letter from DNR Contaminated Sites, soil and groundwater impact identified at B3/TMW3 on the Grieder Motors property, which includes some volatile organic compounds (VOCs) regulated at leaking underground storage sites, warrants further assessment regardless of the source(s) of contamination. Further assessment of soil and groundwater should be conducted only if and when a decision is made to develop the west part of the Grieder site as mentioned in the LSI (Phase II) report. Until that time, no further assessment is required.

Thank you for your cooperation in providing the 2020 Phase 1 ESA and LSI reports. Please contact me by e-mail at ruth.hummel@dnr.iowa.gov or by phone at (515) 725-8328 or , if you have questions or concerns with this letter. In all correspondence regarding this project, include the LUST number, which is indicated in the Subject heading of this letter.

Sincerely,

A handwritten signature in purple ink that reads "Ruth Hummel". The signature is fluid and cursive, with the first name "Ruth" and last name "Hummel" clearly distinguishable.

Ruth Hummel

Environmental Specialist Senior

Underground Storage Tank Section

C: DNR Field Office 1, Manchester
Matt Culp, DNR Contaminated Sites (email)
Daniel Green, Terracon Consultants(email)