



Iowa Department of Natural Resources
Land Recycling Program Enrollment Application

CASHIERS USE ONLY
0221-542-221A-0570
Organization
Contact Name

Please read the department rule in Chapter 567 Iowa Administrative Code 137 and read the instructions in Iowa Land Recycling Program Guidance Document #1 before completing this form.

PART A: Participant Information

Organization: Iron Mountain Land Company LLC Title: Owner Manager
Contact Name: Dennis Rippentrop Telephone Number: 641-228-3384
Address: 1788 Maple Drive City, State, Zip: Charles City, IA 50616
E-mail Address: dennis@chwilson.biz Fax Number: 641-228-3143

- Attachment A1 - Nature of Participation: Pertaining to the participant identified above, describe the reason(s) for participation in this program, legal relationship to the property being enrolled, and the expected role and scope of participation. Include this information as Attachment A1.
- Attachment A2 - Additional Participants: If there is more than one participant, please attach the above information for each participant and label it as Attachment A2.
- Attachment A3 - Interested Parties: If there are other interested parties, please identify them and describe their relationship to this project. Include this information and label it as Attachment A3.

PART B: Property/Affected Area and Access Information

Property Name: Former Allied Products Corporation - White Farm Equipment Plant Site
Address/Location: 300 Lawler Street City and Zip: Charles City, IA 50616
County: Floyd Parcel Number(s): 006+12-06-301-006-00
Property Owner (fee title holder): Charles City Area Development Corporation
Property Owner Mailing Address: 401 N Main Street, Charles City, IA 50616

I, the fee title holder of the property identified in Part B, grant access/control to that property for the purpose of participating in the Iowa Land Recycling Program.

Signature:  Date: 10.25.2021

- Attachment B1 - Property Access: If access has not been obtained for the property/affected area identified in Part B, please attach an explanation of the efforts taken to obtain access and, if appropriate, the reasons given for refusal. Please label it as Attachment B1 - Property Access.
- Attachment B2 - Additional Property to be Enrolled: If the affected area is known to extend to properties other than the one identified in Part B, then please attach all the information requested under Part B for those additional properties as Attachment B2 - Additional Property to be Enrolled.

PART C: Hazardous Substance Information

- Attachment C1 - Condition to be Addressed: Please attach information documenting the environmental condition which is the subject of this enrollment. Please label it as Attachment C1 - Condition to be Addressed. For information regarding the contents of this attachment, please consult Iowa Land Recycling Program Guidance Document #1.
- Attachment C2 - Other Known Contamination: For contamination other than that covered in Attachment C1, which is known and reportable, please attach relevant information as Attachment C2 - Other Known Contamination. See the Iowa Land Recycling Program Guidance Document #1 for further details.

PART D: Historical Information

- Attachment D - Historical Information: Please give a general description of the current and historical uses of the property or properties identified in Part B, based on a reasonable and diligent inquiry. Identify known or probable sources and locations of hazardous materials which could reasonably be associated with past land use. Please attach this as Attachment D - Historical Information.

PART E: Project Objectives

Attachment E: Please attach a statement of project objectives as Attachment E. This should include the following information, insofar as it is known:

- E1 - Current Setting: A general description of the property and its vicinity, including: current zoning and type of land use (e.g., commercial, industrial, residential).
- E2 - Future Setting: Planned or probable future uses of the property or its vicinity.
- E3 - Time Table: Expected time frame for activities reflected in item E2.
- E4 - Estimate of Project Magnitude: A general description of the nature and magnitude of the environmental contamination to be addressed and the probable means of addressing it.
- E5 - Anticipated Obstacles to Completion: A description of any foreseeable barriers to achieving project objectives, such as: access to property; financing uncertainties; legal actions; allocation of responsibility among parties; etc.

PART F: Other attachments (Attachments F1 through F3 are required only if applicable.)

- Attachment F1 - General Environmental Regulatory Actions and Permits: Attach a list of all known permits or regulatory actions and directives associated with environmental conditions at the site as Attachment F1 – General Environmental Regulatory Actions and Permits.
- Attachment F2 - Federal Environmental Regulatory Actions: Attach an explanation of any federal regulatory corrective action directives, administrative orders or judicial actions associated with environmental conditions at the site as Attachment F2 - Federal Environmental Regulatory Actions.
- Attachment F3 - Proof of Federal Notification: Submit written proof that the federal regulatory agency, associated with responses to F1 or F2, has been notified regarding the intent to enroll the site in the Iowa Land Recycling Program.

Attach the \$750 application fee payable to the Iowa Department of Natural Resources and mail along with the form to:

Department of Natural Resources
Contaminated Sites
502 E 9th St
Des Moines, IA 50319

Applicant signature:  Date: 25 Oct. 2021

For DNR office use:
Reviewed by:  Date: November 4, 2021

Review Action: ☒ Approved ☐ Denied ☐ Withdrawn

Explanation attached if denied or withdrawn

PART A – PARTICIPANT INFORMATION

Attachment A1 – Nature of Participation

As a prospective purchaser of the above referenced property, Iron Mountain Land Company LLC (Iron Mountain) intends on obtaining regulatory no further action (NFA) on the impacted property. The site resides between the Canadian National Railway (CN) and the Canadian Pacific Railway Company (CP) and provides a unique opportunity to access both rail networks. The site includes Floyd County Parcel 006+12-06-301-006-00 as shown on the attached topographic map. The attached drawing (Concept 4a) shows the initial phases of the project with connections to the CP (north side) and CN (south side). The planned use for the property is as a manifest level transload facility focusing initially on liquid propane and bio-oils. Expansion may include movement of renewable diesel products and grain transport related to a crushing facility. The site is relatively flat, without a significant grade variation. The proposed construction of the site will work to minimize excavation by placing new rail and storage facilities as close to current grades as possible, minimizing disturbance of the underlying soils. The elevated area identified as “The Hill” located near the southeast portion of the site will not be included in the proposed development and will not be evaluated as part of this application. A survey is being performed to identify this area. Concept Site Plans of the proposed development are attached.

Iron Mountain has retained Terracon Consultants, Inc. (Terracon) of Cedar Falls, Iowa to perform additional site characterization activities, risk analysis, and provide a feasibility study / engineering cost estimate, if requested.

Attachment A2 – Additional Participants

No other participants at this time.

Attachment A3 – Interested Parties

No other interested parties at this time.

PART B – PROPERTY / AFFECTED AREA AND ACCESS INFO

Attachment B1 – Property Access

No access problems are foreseen, Charles City Area Development Corp (CCADC) is currently the owner of the site. Terracon provided an Access Agreement to CCADC on 10/21/21 for environmental services at the site and CCADC authorized the Access Agreement on 10/21/21.

Attachment B2 – Additional Property Access to be Enrolled

None at this time.

PART C – HAZARDOUS SUBSTANCE INFORMATION

Attachment C1 – Condition to be Addressed

Terracon completed a Phase I Environmental Site Assessment (Terracon Project 13157747) for the site dated January 26, 2016. In addition, the following reports have been made available from the Iowa Department of Natural Resources (IDNR) Contaminated Sites Database.

- **Soil and Groundwater Quality Assessment Report**
Allied Products Facility
Dated: December 15, 1999
Prepared by: Pendergast Sarni Itell (PSI)
For: Allied Products Incorporated
- **Targeted Brownfields Assessment**
Phase II Assessment Work Plan Results
Allied Products Corporation
Dated: January 2005
Prepared by: Iowa Department of Natural Resources (IDNR)
- **Targeted Brownfields Assessment**
Phase II Assessment Work Plan Addendum Results
Allied Products Corporation
Dated: March 2005
Prepared by: IDNR
- **Phase II Site Assessment Work Plan Addendum Results and Future Site Use:**
Former Allied Products Corporation / White Farm Equipment Plant Site
Dated: March 29, 2005
Prepared by: IDNR

Based on these findings of the Phase II Site Assessment Work Plan and Addendum, the IDNR provided a summary of the department's comments on appropriate considerations that should be reviewed by the Charles City Area Development Corporation (CCADC) in the context of future land use and redevelopment.

Current Site Conditions

In consideration of the analytical results of soil and groundwater samples collected to date, and in review of the current use of the site (vacant, with no evident use, occupancy, or ongoing contact with the site) an immediate hazardous condition does not exist on the site. However, as noted in the Phase II addendum, soil contamination above the Iowa Department of Natural Resources' (IDNR's) SWS for lead, antimony, and cadmium exist in the foundry sand fill areas on the east end of the site. The soil contamination does not appear to be leaching into groundwater. Also, groundwater contamination in excess of LRP Statewide Standards for volatile organic compounds (VOCs) was found on site, but subsequent groundwater testing off-site, has shown that no sample exceeded the SWS. As such, no significant future impact to off-site groundwater is anticipated.

- **Limited Site Investigation:**
Former Allied Products Corporation / White Farm Equipment Plant Site
Dated: January 29, 2021
Prepared by: Terracon

The objectives of the LSI was to explore/confirm the potential presence of lead, antimony and cadmium compounds in soil as a result of historical on activities and compare concentrations of chemicals of concern (COCs) to current standards and the Phase II Site Assessment Work Plan Addendum Results dated March 2005 prepared by the IDNR. The IDNR investigations were limited to screening with an XRF, not by laboratory analysis. Terracon resampled 12 duplicate points that the IDNR screened with an XRF. Based on the analysis, Terracon concluded the following:

- Laboratory analysis did not measure antimony to exceed a method detection limit with the exception of one sample. This sample was less than 50% of the SWS. Therefore, antimony would not be considered a chemical of concern for the site.
- Laboratory analysis for cadmium exceeded the method detection limit in four samples. However, the highest reported concentration is less than 50% of the SWS. Terracon concludes that the elevated XRF readings were likely due to soil matrix interferences and not the analyte of concern. Therefore, cadmium would not be considered a chemical of concern for the site.
- Terracon concluded that XRF readings for lead that recorded 600 or above had a close correlation with laboratory results. To the contrary, XRF readings less than 600 did not correlate well. Therefore, using an XRF correlation to the laboratory, an XRF reading of 500 would correlate with a laboratory result of 400 mg/kg using the XRF correlation of 500, Terracon has outlined areas of concern on Exhibit A-3 of the report. These areas of concern will require special management during future development planning.

- **IDNR Response to Limited Site Investigation dated January 29, 2021**
Former Allied Products Corporation / White Farm Equipment Plant Site
Dated: February 12, 2021
Prepared by: IDNR

The Iowa Department of Natural Resources, Solid Waste & Contaminated Sites Section, (Iowa DNR) has reviewed the above referenced limited site investigation report submitted by Terracon Consultants, Inc. on behalf of the Charles City Area Development Corporation. Iowa DNR acknowledges the difference in soil sample results for antimony and cadmium and the similarities in the lead results. Both this limited site investigation and the 2005 Iowa DNR report indicate the need for proper soil management during any future site development activities.

Regardless of the difference between this report and the 2005 Iowa DNR report, Iowa DNR agrees with the overall findings of the limited site investigation including Section 7.0, Recommendations. As noted in Section 7.0, a soil and groundwater management plan will need to be submitted to Iowa DNR prior to any demolition/construction activities at the Former Allied Products Corporation / White Farm Equipment Plant Site. It is recommended that any additional metals sampling include all eight of the RCRA priority metals.

- **Soil and Groundwater Management Plan**
Former Allied Products Corporation / White Farm Equipment Plant Site
Revised Date: July 26, 2021
Prepared by: Terracon

The purpose of this Plan is to serve as a risk management advisory to developers and contractors and assist in protecting human health and the environment by providing a proposed approach for managing known and potential environmental conditions at the property. This Plan is intended to inform the developer, construction contractors and site workers of conditions of potential and documented environmental impacts. This Plan documents the suggested approach for managing known environmental impacts as well unknown conditions that may be encountered during the redevelopment of the property. This Plan presents proposed methods and actions to be taken in the event of impacted material discovery and controls that will be implemented to manage the impacts. The Plan identifies work practices that should be used to reduce the potential for exposure to documented environmental impacts or minor concentrations of residual chemicals in environmental media at the site. If stormwater or groundwater collects in excavations or trenches and is in contact with impacted soils, dewatering of excavations or trenches may require special handling for proper disposal.

This Plan proposes response actions outlined in Section 9.0 through 14.0 to allow for the proper management and handling of impacted environmental media that may be displaced during the Project.

This Plan includes the following:

- A description of known or suspected contaminants that could be encountered;
- A description of methods to be used to segregate apparently impacted soil from unimpacted soil at the property;
- A description of soil management procedures to be followed to facilitate the proper disposition of impacted soils removed from the property;
- A description of the site safety responsibilities and contingency actions to be implemented, if necessary, at the property;
- A description of management practices for potentially impacted groundwater or stormwater that requires treatment or disposal;
- Hazard recognition procedures when working with environmentally impacted media; and hazard response procedures, if needed, when working with environmentally impacted media.

Attachment C2 – Other Known Contamination

No other environmental contamination is known at this time.

ATTACHMENT D – HISTORICAL INFORMATION

Terracon performed a Phase I ESA (Terracon Report 13157747 dated January 26, 2016). We understand that the site is relatively unchanged since that time. Based on review of historical information, The Hart Parr Company originally built on the site to manufacture farm equipment in 1901 and owned the site until 1929, followed by the Oliver Farm Equipment Company until 1960; the White Motor Company purchased the property and operated the plant until 1985 followed by Allied Products Corporation with manufacturing ceasing in 1993. The structures were razed in 1993 leaving the concrete floor slabs and pavements in place. The primary production throughout the operations history of the plant was manufacturing of farm equipment consisting of agricultural tractors. Activities performed to produce the farm equipment included foundry, plating, quenching, chemical washing, painting, and assembly operations.

PART E - PROJECT OBJECTIVES

Attachment E1 – Current Setting

LRP Enrollment Attachment

Former Allied Products Corporation ■ Charles City, Iowa

October 25, 2021 ■ Terracon Project No. 13217090



The fenced site consists of approximately 62.40± acres located at 300 Lawler Street in Charles City, Floyd County, Iowa. The site consists of concrete pavement, former floor slabs and vacant land overgrown with trees of various sizes. The south east corner of the site known as “The Hill” and reportedly was historically used to landfill baghouse dust, foundry sand, slag and scrap pile. No above grade structures are currently located on the site. A railroad spur is located around the south, east and northern portions of the site.

Attachment E2 – Future Setting

The planned use for the property is as a manifest level transload facility focusing initially on liquid propane and bio-oils. Expansion may include movement of renewable diesel products and grain movement related to a crushing facility.

- Expected through-put volumes include:
 - Initial Phase:
 - LP – 25 million gallons per year. Forty to 50 cars per week during peak periods
 - Bio-oils – 25 cars per week.
- The attached drawing (Concept 4a) shows the initial phases of the project with connections to the CP (north side) and CN (south side). Facility will have an interconnection between CN and CP, sized to accommodate around 150 to 200 cars per week with daily manifest service.
- In addition, this project can be a steppingstone to a potential unit train facility east of the site.

Attachment E3 – Time Table

Description	Start	Completion
ILRP Application	October 2021	October 2021*
QAPP / Work Plan	November 2021	November 2021*
Investigation Fieldwork / Report	November 2021	December 2021
Risk Evaluation / Remedial Action Report (RE/RA)	January 2022	February 2022
Site Closure	Spring 2022	To be determined

*Based on IDNR acceptance

Attachment E4 – Estimated Project Magnitude

The site currently has an IDNR reviewed Soil and Groundwater Management Plan. With this application, additional soil definition and groundwater analysis for current conditions is proposed. Terracon proposes to offset soil failures, perform additional assessment to confirm Terracon's LSI assumptions and conclusions, and perform additional groundwater analysis for current conditions. Terracon's proposed approach will be outlined in a QAPP with Sampling Plan, and a detailed Work Plan. The QAPP/Sampling Plan will be included as part of the Work Plan.

LRP Enrollment Attachment

Former Allied Products Corporation ■ Charles City, Iowa
October 25, 2021 ■ Terracon Project No. 13217090



An anticipated scope may include up to twelve soil borings and six temporary monitoring wells. Soil borings will offset areas of confirmed impact and monitoring wells would be placed in areas of former known groundwater impact as outlined from historical investigations.

Following the additional assessment, remedial alternatives will be presented in the RE/RA to address on-site soils management, potential off-site disposal and environmental covenants to address chemicals of concern that may exceed 567-IAC-137 standards.

Attachment E5 – Anticipated Obstacles to Completion

Presently, No anticipated obstacles to completion are foreseen. The IDNR will be notified should an obstacle develop.

PART F - OTHER ATTACHMENTS**Attachment F1 – General Environmental Regulatory Actions and Permits**

No known permits or regulatory actions and directives associated with environmental conditions at the site.

Attachment F2 – Federal Environmental Regulatory Action

No known federal regulatory corrective action directives, administrative orders or judicial actions associated with environmental conditions at the site.

Attachment F3 – Proof of Federal Notification

Since the site is not under federal environmental regulatory programs, federal notification has not been performed.

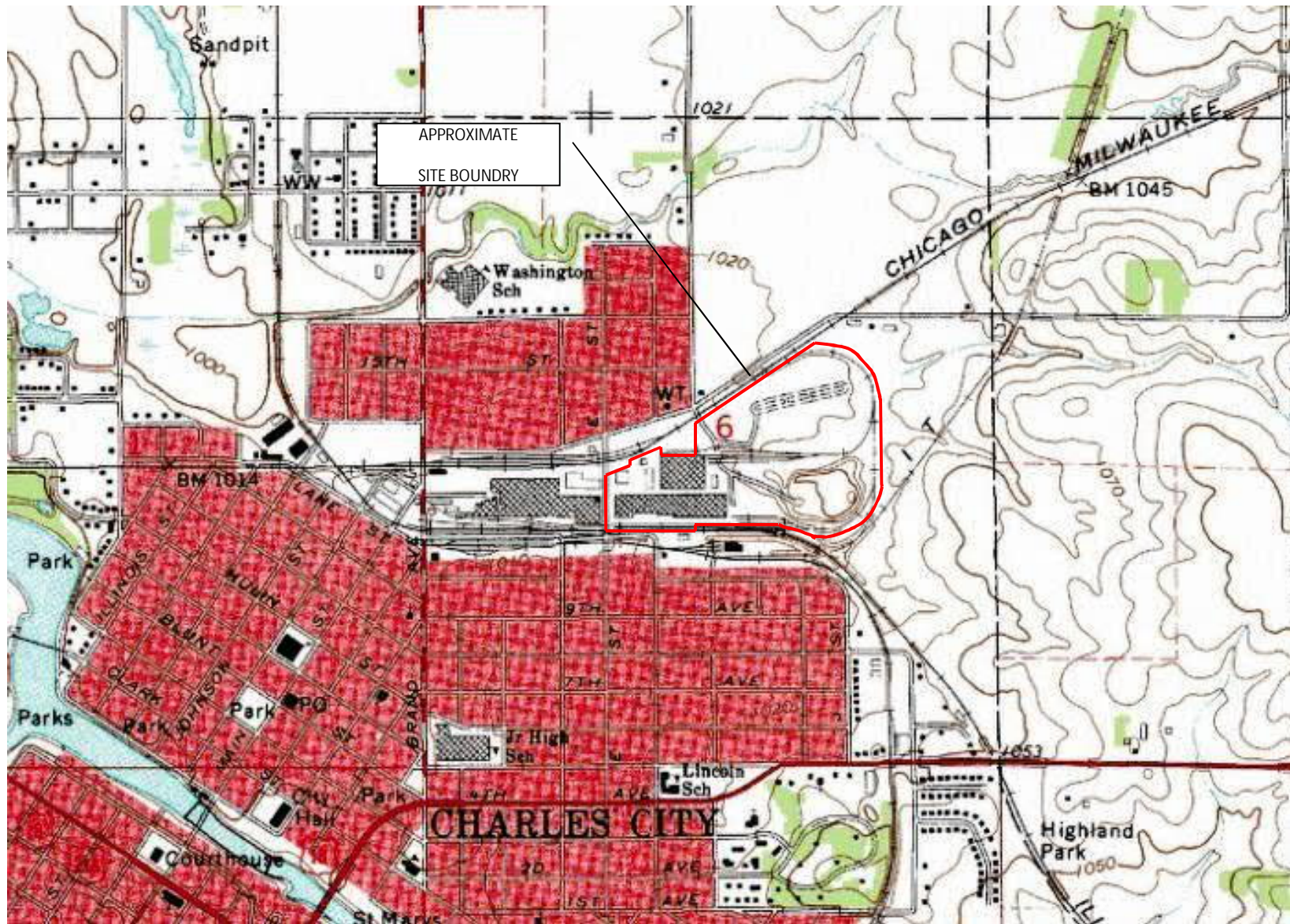


DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

Project Manager:	DCC	Project No.	131217090
Drawn by:	DCC	Scale:	N.T.S.
Checked by:	DCC	File Name:	
Approved by:	DCC	Date:	10/25/2021

Terracon
Consulting Engineers & Scientists

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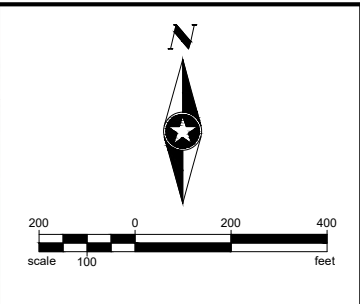
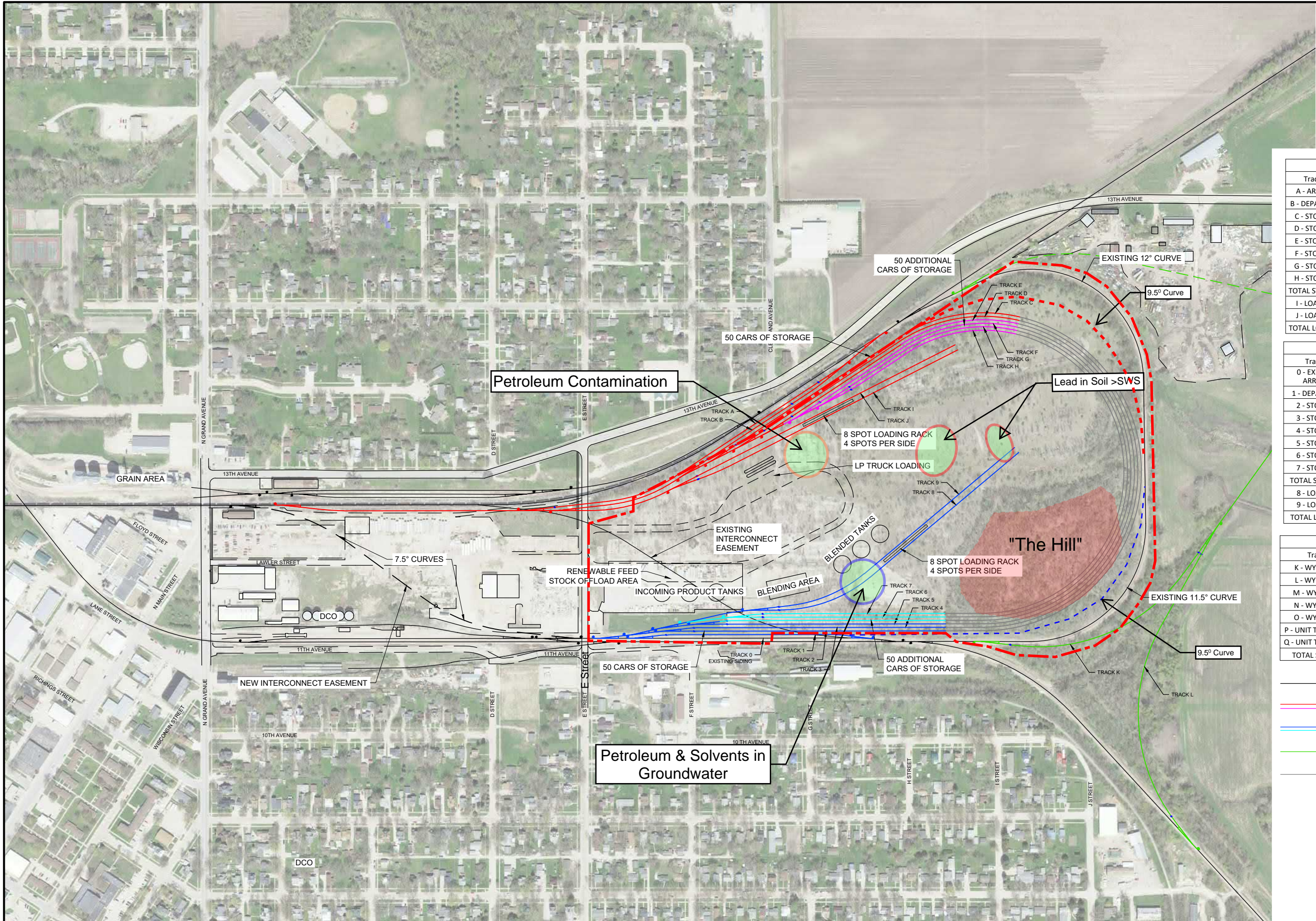
SITE MAP

Former Allied / White Site
300 Lawler Street
Charles City, Iowa

Exhibit

1

Save: 5/4/2021 9:44 AM ctrak Plot: 5/5/2021 11:22 AM X:\AEC\CCRTL\160059\5-final-dsgn\51-drawings\10-Civil\cadwg\exhibit\CC160059EX4.dwg



LP TRACKS		
Track #	Clear Length	Capacity @ 60' Cars
A - ARRIVAL	1280	21
B - DEPARTURE	433	7
C - STORAGE	1382	23
D - STORAGE	1235	20
E - STORAGE	1088	18
F - STORAGE	942	15
G - STORAGE	788	13
H - STORAGE	776	12
TOTAL STORAGE	6211	101
I - LOADING	1247	20
J - LOADING	1248	20
TOTAL LOADING	2495	40

RENEWABLE FEED STOCK TRACKS		
Track #	Clear Length	Capacity @ 60' Cars
0 - EXISTING ARRIVAL	733	12
1 - DEPARTURE	733	12
2 - STORAGE	1083	18
3 - STORAGE	1083	18
4 - STORAGE	940	15
5 - STORAGE	940	15
6 - STORAGE	786	13
7 - STORAGE	786	13
TOTAL STORAGE	5618	92
8 - LOADING	1260	21
9 - LOADING	1245	20
TOTAL LOADING	2505	41

UNIT TRAIN TRACKS		
Track #	Clear Length	Capacity @ 70' Cars
K - WYE TRACK	3264	46
L - WYE TRACK	1220	17
M - WYE TRACK	1743	24
N - WYE TRACK	3587	51
O - WYE TRACK	1214	17
P - UNIT TRAIN LOOP	8640	123
Q - UNIT TRAIN LOOP	8558	122
TOTAL STORAGE	17198	245

- EXISTING TRACK
- PROPOSED LP TRACK
- PROPOSED RENEWABLE FEED STOCK TRACK
- PROPOSED UNIT TRAIN TRACK
- FUTURE TRACK