



July 12, 2022

Polk County Public Works  
Air Quality Division  
5885 NE 14<sup>th</sup> Street  
Des Moines, Iowa 50313

Re: Air Quality Conditional Permit No. 04470  
Polk County Construction Permit #3399  
2022 First Half Semi-Annual Monitoring Report  
LCS Warehouse LLC, Des Moines, Iowa  
Project No.: 143515

Dear Polk County Public Works Air Quality Division:

On behalf of LCS Warehouse LLC (formerly LCS Holdings Inc.), the following information is provided to comply with the requirements of Air Quality Conditional Operating Permit No. 04470. The referenced permit was granted on October 28, 2019 under Polk County Construction Permit #3399, for the installation of a subslab depressurization (SSD) system at 116 Forest Avenue, Building C, Des Moines, Iowa. Continuous operation of the vapor intrusion mitigation system began on May 27, 2020.

The SSD system has been operating on a 24 hour per day basis. When operating, the system was discharging subslab vapors at a rate of approximately 29 standard cubic feet per minute (scfm). The effluent subslab vapor from the SSD system was sampled for total volatile organic compounds (VOCs) during the first half of 2022 on June 15, 2022. The laboratory reported detections of total VOCs at 270  $\mu\text{g}/\text{m}^3$ , well below the permit limitation of 62,756  $\mu\text{g}/\text{m}^3$ . The analytical results for this sample are enclosed with this report.

This information is provided to comply with the requirements of the Air Quality Conditional Operating Permit No. 04470. All rights and obligations related to the 116 Forest Ave. project site, including this air quality emission source permit, were assigned to and assumed by LCS Warehouse LLC via the attached agreement. An entity name change is requested for the Air Quality Conditional Operating Permit 04470 and the Air Quality Emission Source Construction Permit No. 3399 from LCS Holdings, Inc. to LCS Warehouse LLC. Reissuing of a revised permit by the Air Quality Division is also requested to reflect this entity name change.



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Air Quality Division  
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If there are any questions about this project, please contact myself or Bridgette Uhlemann of LCS Warehouse LLC at (515) 875-4563.

Sincerely,

A handwritten signature in blue ink that reads "Chris Hoglund". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Chris Hoglund  
Project Manager  
(816) 800-9248

Attachments:

- Attachment 1 – Laboratory Analytical Report
- Attachment 2 - LCS Warehouse LLC Assignment and Assumption Agreement

cc: Dan Cook - IDNR  
Dan Smith – Barton Solvents, Inc.  
Bridgette Uhlemann – LCS Warehouse LLC  
Brad Goldman – Nautilus Investments, Inc.

**ATTACHMENT 1 – LABORATORY ANALYTICAL REPORT**

6/29/2022

Mr. Chris Hoglund  
Burns & McDonnell  
9400 Ward Parkway

Kansas City MO 64114

Project Name: Barton Solvents Subslab

Project #:

Workorder #: 2206386A

Dear Mr. Chris Hoglund

The following report includes the data for the above referenced project for sample(s) received on 6/16/2022 at Eurofins Air Toxics LLC.

The data and associated QC analyzed by TO-15 are compliant with the project requirements or laboratory criteria with the exception of the deviations noted in the attached case narrative.

Thank you for choosing Eurofins Air Toxics LLC. for your air analysis needs. Eurofins Air Toxics Inc. is committed to providing accurate data of the highest quality. Please feel free to contact the Project Manager: Brian Whittaker at 916-985-1000 if you have any questions regarding the data in this report.

Regards,



Brian Whittaker  
Project Manager

**WORK ORDER #: 2206386A**

Work Order Summary

**CLIENT:** Mr. Chris Hoglund  
Burns & McDonnell  
9400 Ward Parkway  
Kansas City, MO 64114

**BILL TO:** Mr. Chris Hoglund  
Burns & McDonnell  
9400 Ward Parkway  
Kansas City, MO 64114

**PHONE:** (816) 333-9400

**P.O. #** 197787

**FAX:**

**PROJECT #** Barton Solvents Subslab

**DATE RECEIVED:** 06/16/2022

**CONTACT:** Brian Whittaker

**DATE COMPLETED:** 06/29/2022

<u>FRACTION #</u>	<u>NAME</u>	<u>TEST</u>	<u>RECEIPT VAC./PRES.</u>	<u>FINAL PRESSURE</u>
01A	SS06152022	TO-15	5.3 "Hg	10 psi
02A	Lab Blank	TO-15	NA	NA
03A	CCV	TO-15	NA	NA
04A	LCS	TO-15	NA	NA
04AA	LCSD	TO-15	NA	NA

CERTIFIED BY:



Technical Director

DATE: 06/29/22

Certification numbers: AZ Licensure AZ0775, FL NELAP – E87680, LA NELAP – 02089, NH NELAP - 209221, NJ NELAP - CA016, NY NELAP - 11291, TX NELAP - T104704434-21-17, UT NELAP – CA009332021-13, VA NELAP - 10615, WA NELAP - C935

Name of Accreditation Body: NELAP/ORELAP (Oregon Environmental Laboratory Accreditation Program)

Accreditation number: CA300005-015, Effective date: 10/18/2021, Expiration date: 10/17/2022.

Eurofins Air Toxics, LLC certifies that the test results contained in this report meet all requirements of the NELAC standards

*This report shall not be reproduced, except in full, without the written approval of Eurofins Air Toxics, LLC.*

180 BLUE RAVINE ROAD, SUITE B FOLSOM, CA - 95630

(916) 985-1000 . (800) 985-5955 . FAX (916) 351-8279

**LABORATORY NARRATIVE**  
**EPA Method TO-15**  
**Burns & McDonnell**  
**Workorder# 2206386A**

One 1 Liter Summa Canister sample was received on June 16, 2022. The laboratory performed analysis via EPA Method TO-15 using GC/MS in the full scan mode.

**Receiving Notes**

The Chain of Custody was missing method assignment in the 'Requested Analyses' checkbox for the associated sample. EATL proceeded with the analysis as per the original contract or verbal agreement.

**Analytical Notes**

The TVOC (Total Volatile Organic Compounds) concentration was calculated by taking the total area counts in the sample and quantitating the area based on the response factor of Toluene-d8.

**Definition of Data Qualifying Flags**

Ten qualifiers may have been used on the data analysis sheets and indicates as follows:

B - Compound present in laboratory blank greater than reporting limit (background subtraction not performed).

J - Estimated value.

E - Exceeds instrument calibration range.

S - Saturated peak.

Q - Exceeds quality control limits.

U - Compound analyzed for but not detected above the reporting limit, LOD, or MDL value. See data page for project specific U-flag definition.

UJ- Non-detected compound associated with low bias in the CCV

N - The identification is based on presumptive evidence.

M - Reported value may be biased due to apparent matrix interferences.

CN - See Case Narrative.

File extensions may have been used on the data analysis sheets and indicates as follows:

a-File was requantified

b-File was quantified by a second column and detector

r1-File was requantified for the purpose of reissue

**Summary of Detected Compounds**  
**EPA METHOD TO-15 GC/MS FULL SCAN**

**Client Sample ID: SS06152022**

**Lab ID#: 2206386A-01A**

<b>Compound</b>	<b>Rpt. Limit (ppbv)</b>	<b>Amount (ppbv)</b>	<b>Rpt. Limit (ug/m3)</b>	<b>Amount (ug/m3)</b>
TVOC ref. to Toluene-d8	20	72	77	270



## Air Toxics

Client Sample ID: SS06152022

Lab ID#: 2206386A-01A

### EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	a062306	Date of Collection:	6/15/22 4:00:00 PM
Dil. Factor:	2.04	Date of Analysis:	6/23/22 01:29 PM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
TVOC ref. to Toluene-d8	20	72	77	270

Container Type: 1 Liter Summa Canister

Surrogates	%Recovery	Method Limits
Toluene-d8	111	70-130
1,2-Dichloroethane-d4	98	70-130
4-Bromofluorobenzene	94	70-130



Client Sample ID: Lab Blank

Lab ID#: 2206386A-02A

## EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	a062305	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 6/23/22 11:21 AM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
TVOC ref. to Toluene-d8	10	Not Detected	38	Not Detected

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Toluene-d8	113	70-130
1,2-Dichloroethane-d4	97	70-130
4-Bromofluorobenzene	92	70-130



Air Toxics

Client Sample ID: CCV

Lab ID#: 2206386A-03A

EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	a062302	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 6/23/22 09:31 AM

Compound	%Recovery
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TVOC ref. to Toluene-d8	100
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Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Toluene-d8	112	70-130
1,2-Dichloroethane-d4	100	70-130
4-Bromofluorobenzene	95	70-130

Client Sample ID: LCS

Lab ID#: 2206386A-04A

## EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	a062303	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 6/23/22 09:55 AM

Compound	%Recovery	Method Limits
TVOC ref. to Toluene-d8	Not Spiked	

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Toluene-d8	112	70-130
1,2-Dichloroethane-d4	102	70-130
4-Bromofluorobenzene	95	70-130



## Air Toxics

Client Sample ID: LCSD

Lab ID#: 2206386A-04AA

### EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	a062304	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 6/23/22 10:19 AM

Compound	%Recovery	Method Limits
TVOC ref. to Toluene-d8	Not Spiked	

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Toluene-d8	113	70-130
1,2-Dichloroethane-d4	100	70-130
4-Bromofluorobenzene	94	70-130



**ATTACHMENT 2 – LCS WAREHOUSE LLC ASSIGNMENT AND ASSUMPTION  
AGREEMENT**

## ASSIGNMENT AND ASSUMPTION AGREEMENT

This Assignment and Assumption Agreement (the "**Agreement**"), effective as of December 29, 2021 (the "**Effective Date**"), is by and between LCS Holdings, Inc., an Iowa corporation ("**LCSH**"), and LCS Warehouse LLC, an Iowa limited liability company ("**LCS Warehouse**").

**WHEREAS**, LCSH adopted a Plan of Liquidation and Dissolution, dated as of November 2, 2021 (the "**Plan of Liquidation**"), pursuant to which, among other things, LCSH has agreed to assign all of its rights, title and interests in, and LCS Warehouse has agreed to assume all of LCSH's duties and obligations under and related to the following ("**Warehouse Matters**"):

- The Weitz Corporation Split-Off Agreement and Plan of Reorganization dated January 19, 1995;
- Administrative Order, Iowa Department of Natural Resources dated March 20, 1995;
- Settlement Agreement Between LCS Holdings, Inc. and Essex Meadows, Inc. for the LCS Warehouse dated July 20, 2020;
- Release, Settlement and Assignment of Rights Agreement dated October 15, 1996; and
- All other rights, obligations and other matters related to the ownership and operation of the property governed by the above that LCSH may have.

**WHEREAS**, in connection with the Plan of Liquidation, LCSH has assigned the Warehouse Matters to LCS Warehouse and hereby desires to document such assignment, effective as of the Effective Date.

**NOW, THEREFORE**, in consideration of the mutual covenants, terms and conditions set forth herein, and for other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the parties agree as follows:

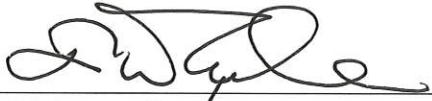
1. Assignment and Assumption. As of the Effective Date, LCSH hereby sells, assigns, grants, conveys and transfers to LCS Warehouse all of LCSH's right, title and interest in and to the Warehouse Matters. LCS Warehouse hereby accepts such assignment and assumes all of LCSH's duties and obligations under or related to the Warehouse Matters and agrees to pay, perform and discharge, as and when due, all of the obligations of LCSH under or related to the Warehouse Matters.

2. Governing Law. This Agreement shall be governed by and construed in accordance with the internal laws of the State of Iowa without giving effect to any choice or conflict of law provision or rule (whether of the State of Iowa or any other jurisdiction).

3. Counterparts. This Agreement may be executed in counterparts, each of which shall be deemed an original, but all of which together shall be deemed to be one and the same agreement. A signed copy of this Agreement delivered by facsimile, email or other means of electronic transmission shall be deemed to have the same legal effect as delivery of an original signed copy of this Agreement.

IN WITNESS WHEREOF, the parties have executed this Agreement intending it to be effective as of the date first above written.

LCS HOLDINGS, INC.

By   
Name: Rick W. Exline  
Title: Executive Vice President

LCS WAREHOUSE LLC

By   
Name: Jason C. Victor  
Title: Senior Vice President/Treasurer