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August 1, 2023

Iowa Department of Natural Resources
502 East 9th Street
Des Moines, Iowa 50319

Attn: Mr. Matthew Graesch, P.G.
P: (515) 725-8331
E: matthew.graesch@dnr.iowa.gov

Re: Site Assessment Work Plan for Indoor Ambient Air Sampling
Quality Products
1901 21st Street, Eldora, Hardin County, Iowa
Terracon Project No. 08237122

Dear Mr. Graesch:

Terracon Consultants, Inc. (Terracon) is pleased to provide this Site Assessment Work Plan (Work Plan) for the above referenced site. In correspondence dated June 29, 2023, the Iowa Department of Natural Resources (IDNR) requested assessment of the vapor intrusion pathways in reference to soil and groundwater impacts identified onsite during due diligence activities completed by others. The additional assessment has been requested by the IDNR to evaluate the risk to site workers. This Work Plan provides the proposed methods and procedures for completion of assessment activities for the site.

1.0 INTRODUCTION

The subject property consists of three parcels totaling 10.97-acres located at 1901 21st Street in Eldora, IA and operates as Quality Products which is owned by H.D. Hudson Manufacturing Co. The subject property is located in the Eldora Industrial Park in the southwest portion of the city of Eldora. A Phase I Environmental Site Assessment (ESA) completed by Allender Butzke Engineers Inc. (ABE) identified the onsite operations and the regulatory investigation of the offsite Dayco Products (Parker Hannifen Corp.) facility as recognized environmental conditions (RECs). These RECs were evaluated through the soil and groundwater sampling presented in the ABE Phase II ESA which indicated concentrations exceeding the IDNR Tier 1 target levels and/or statewide standards (SWS). Terracon summarized the findings of the ABE reports in correspondence dated June 6, 2023, which lead to the IDNR's request for additional vapor intrusion assessment.

2.0 FIELD ACTIVITIES

Terracon has a 100% commitment to the safety of all its employees. As such, and in accordance with our *Incident and Injury Free®* safety culture, Terracon will prepare a site-specific safety plan for use by our personnel during field services. Prior to commencement of onsite activities, Terracon will hold a meeting to review health and safety needs for this specific project. At this time, we anticipate performing fieldwork in an Environmental Protection Agency (EPA) Level D work uniform consisting of hard hats, safety glasses, protective gloves, and steel-toed boots. It may become necessary to upgrade this level of protection during drilling or sampling activities in the event that petroleum or chemical constituents are encountered in soils or groundwater that present an increased risk for personal exposure. The site-specific health and safety plan will be generated prior to Work Plan field activities and will be utilized by Terracon personnel and subcontractors.

2.1 Indoor Ambient Air Sampling

Indoor ambient air samples are proposed within the existing site building for volatile organic compounds (VOCs) analysis. The samples will be collected from the lowest level in the building which is assumed to be the first floor since the building is an apparent slab-on grade warehouse and manufacturing facility. Three indoor ambient air samples are proposed within building (warehouse and office spaces) and one exterior ambient air sample will be collected from the outside of the building to serve as a control sample (4 total). One blind duplicate will be collected from inside the building according to quality assurance/quality control (QA/QC) protocols. Refer to the attached Exhibit 1 for the proposed air sample locations.

The indoor ambient air samples will be collected using batch-certified, laboratory-supplied 6-liter summa canisters with time-weighted regulators set for 8-hour tests for the building (commercial/light industrial use). The cannisters will be set up in the lowest occupiable level away from areas of increased air movement such as vents, fans, windows, and/or outside doors. The cannisters will be placed at a height that would simulate the breathing zone of occupants in the specific room (approximately 3 feet above the floor). The exterior ambient air sample will be collected using a batch-certified, laboratory-supplied 6-Liter Summa canister with time-weighted regulator set for an 8-hour test. The exterior ambient air cannister will be set up at a location upwind of localized sources of vapors such as building vents, passive vapor mitigation system vents, and/or vehicles as determined on the day of sampling. The indoor and exterior ambient air sample collection procedures will generally adhere to "*Terracon Soil Gas Investigation Guidance Document Version 1.0*" dated August 7, 2013.

The indoor and exterior ambient air samples will be secured with a custody seal and relinquished to a State of Iowa certified analytical laboratory under typical chain-of-custody procedures for standard analytical turnaround (10 business days). Summa canister vacuums

will be recorded upon initiation of sample collection, following sample collection, and after receipt at the laboratory. In addition, the start and end time of the samples will be recorded on the chain-of-custody form(s).

3.0 LABORATORY ANALYTICAL METHODS

The indoor ambient air, exterior ambient air, and blind duplicate samples will be analyzed for VOCs according to EPA Method TO-15.

4.0 DATA EVALUATION

The indoor ambient air, exterior ambient air, and blind duplicate samples will be tabulated and compared to the Occupational Safety and Health Administration (OSHA) Permissible Exposure Limits (PELs) 8-hour Time Weighted Average (TWA) and/or evaluated using the IDNR Cumulative Risk Calculator for Site and Construction Worker using the highest reported, individual concentrations of each analyte that exceeds a method reporting limit.

5.0 REPORTING

Once field activities are complete and laboratory results have been received, a Site Assessment Report (SAR) will be prepared to present the obtained data. The SAR will include the following information and be submitted to the IDNR Contaminated Sites Section for review:

- Description and documentation of field activities and techniques
- Scaled site diagram with investigatory sampling locations and other pertinent exhibits
- Tabulated analytical results
- Laboratory reports
- Comparison of laboratory results to OSHA PELs
- Risk analysis using the IDNR Cumulative Risk Calculator, if applicable
- Conclusions and Recommendations

6.0 SCEHDULE

The following is a tentative schedule for implementing the Work Plan:

- Complete field activities – August 2023
- Submit SAR – September 2023

Please note this schedule is tentative and will be dependent upon Terracon personnel availability, timing of laboratory results, weather, etc. Terracon will provide updates during the activities as needed, including schedule, to the IDNR, HD Hudson, Honigman LLP, and Nyemaster Goode PC.

Terracon appreciates the opportunity to provide this Work Plan. We look forward to meeting the IDNR requirements for the site and assisting our client with the site assessment activities. If you have any questions or comments pertaining to the material presented herein, please contact the undersigned at (515) 244-3184 or by email at jake.haden@terracon.com.

Sincerely,
Terracon Consultants, Inc.

Jake A. Haden
Environmental Group Manager

Jesse M. Nelson, REM, CGP
Senior Scientist

Attachment: Exhibit 1

Copies: Mr. Ken Vermeulen – Honigman LLP (emailed)
Mr. Ken Recor – HD Hudson (emailed)
Mr. Ron Dorf – HD Hudson (emailed)
Ms. Hallie Still-Caris – Nyemaster (emailed)

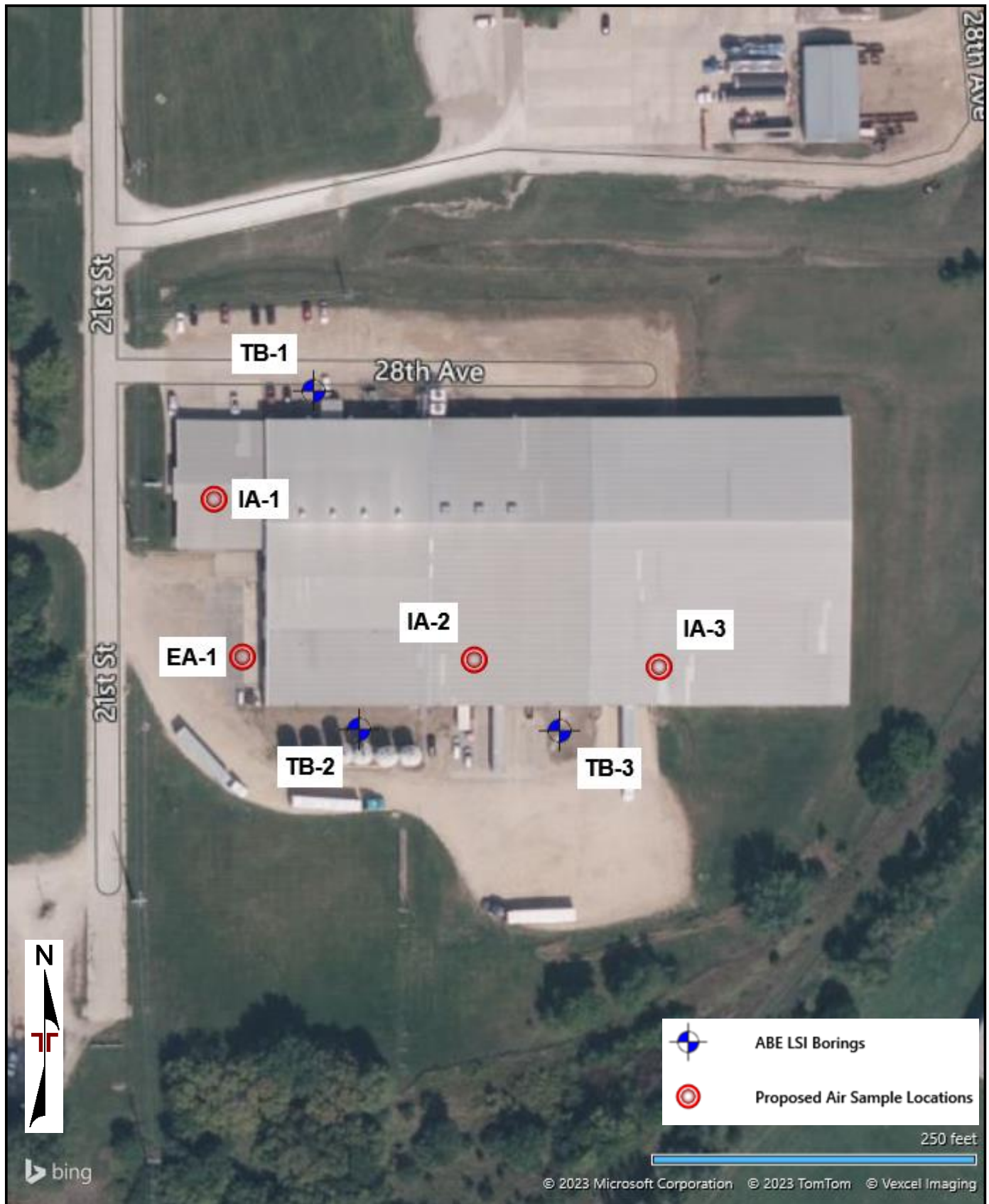


DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

AERIAL PHOTOGRAPHY PROVIDED BY MICROSOFT BING MAPS

Project Manager: JAH	Project No. P08237203	 600 SW 7th St, Ste M Des Moines, IA 50309-4508	Proposed Air Sample Locations	Exhibit
Drawn by: JAH	Scale: AS SHOWN		Indoor Ambient Air Sampling	1
Checked by: JMN	File Name: EX1		Quality Products	
Approved by: JMN	Date: 7/17/23		1901 21 st Street, Eldora, IA	