



November 20, 2023

TIFFANY AYER  
THE MOSAIC COMPANY  
13830 CIRCA CROSSING DR  
LITHIA FL 33547

**Re: Fmr. AGRICO Chemical Company (335<sup>th</sup> Ave. and 200<sup>th</sup> St., Fort Madison, IA 52658)  
Contaminated Sites Database Site ID No. 77  
Review of Annual Compliance Inspection and Determination of Site Status**

Dear Ms. Ayer:

The Iowa Department of Natural Resources (DNR) received the 2022 Annual Compliance Inspection Report in March 2023. Thank you for the submission. The report summarizes wetland/cooling pond pH values collected in 2022 and gypsum stack inspection/maintenance actions completed throughout the year. In addition to the Inspection Report, the DNR attended a site visit along with members of Mosaic and TRC Environmental Corp. in July 2023. A site history and remedial action summary were provided during a tour of the facility, which included inspections of the cooling pond and gypsum stacks. The facility was well maintained and

During the site visit, the cooling pond area was mostly dry outside of a seep zone near Gypsum Stack 1. When water is present in the pond, pH values at multiple locations have been collected and found to be lower than the 6.5 standard outlined in Iowa Administrative Code ([IAC 567.61](#)). In 2020, the DNR accepted a request to cease groundwater monitoring for chemicals of concern (COCs) in accordance of [IAC 567.133](#) due to stable or declining contaminant trends. As routine monitoring for COCs is no longer required at the site, overview of the site pH values falls outside the purview of the DNR Contaminated Sites Section and would be better handled by Water Quality/NPDES. At this time, the Contaminated Sites Section has no additional requirements for the wetland/cooling pond but please defer to NPDES and/or the Army Corps of Engineers for any alternate requirements due to pH levels.

Regarding the gypsum stacks, establishing an Environmental Covenant (EC) on the stack portion of the property is likely the best long-term solution for moving the site towards closure. The EC would require the current or any future property owner/responsible party to protect the cap in perpetuity and complete biennial engineering inspections on the cap. As the EC would allow for continued maintenance of the stacks, additional remedial efforts would no longer be required. With establishment of the EC, the site may move towards closure with no reporting requirements outside of the biennial engineering inspection.

Feel free to contact me with any questions at [\(515\) 721-7024](tel:5157217024) or by email at [andrew.carver@dnr.iowa.gov](mailto:andrew.carver@dnr.iowa.gov).

Sincerely,

Andrew Carver, CGP# 2106  
Environmental Specialist  
Land Quality Bureau

cc: Iowa DNR Field Office #6  
Washington, IA

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