



February 19, 2024

MR TROY BATZEL
KWIK TRIP, INC.
1626 OAK STREET
P.O. BOX 2107
LA CROSSE, WISCONSIN 54602

**Re: Kwik Trip #1700 Webster City (505 Fair Ave, 601 Fair Ave, and 1539 2nd St, Webster City, Iowa 50595)
Contaminated Sites Database Site ID No. 2789
Limited Site Investigations**

Dear Mr. Batzel:

The Iowa Department of Natural Resources, Solid Waste and Contaminated Sites Section (DNR) has reviewed the February 7, 2023 Phase I Environmental Site Assessment (ESA) ([Doc #41300](#)), the March 8, 2023 Limited Site Investigation (LSI) Report ([Doc #41302](#)), the October 7, 2023 Phase I ESA ([Doc #41301](#)), and the October 26, 2023 LSI ([Doc #41303](#)) for the Site located in Webster City, Iowa. The DNR understands that the intent with this site is to redevelop it as a gas station.

The reports detail recognized environmental conditions (RECs) at the location, as well as soil and groundwater samples collected to investigate those RECs. Historical uses of the site and surrounding properties includes single-family and multi-family residences as well as various commercial businesses including gas stations, auto repair shops, and a tool and die facility. The site currently contains an apartment building, an auto service building and associated salvage yard, two garages, and a machine shop/tool and die facility. Various small containers of used motor oil, concrete staining at multiple locations, and a strong fuel odor in the soil of the salvage yard area were reportedly observed on site during the Phase I ESA. Additionally, records indicate that the site historically contained two USTs as well as multiple operations that have the potential to have released hazardous substances to the environment.

To investigate these RECs, twelve borings were advanced on the property and a soil sample was collected from each boring at the depth interval posing the highest potential for contamination based on field observations and photo-ionization detector (PID) readings. Following the collection of a soil sample, a temporary groundwater monitoring well was installed and a groundwater sample was collected from each boring.

Multiple volatile organic compounds (VOCs), total extractable hydrocarbons (TEH) as waste oil and gasoline, and multiple resource conservation and recovery act (RCRA) metals were detected above laboratory reporting limits in both soil and groundwater. Of the detected constituents in soil, arsenic was the only one that exceeded its applicable Tier 1 target level and/or statewide standard (SWS). Your consultant has suggested that the levels of arsenic detected are consistent with background levels expected in this area, and in this instance and for the intended site use DNR agrees with this suggestion. Multiple VOCs were detected above applicable Tier 1 target levels and/or SWS in groundwater. However, due to the fact that no wells exist on the site and the city of Webster City has an institutional control in place to prevent the installation of new wells, this exposure route is severed and does warrant further consideration at this time.

DNR has reviewed the risks associated with the chemicals and associated detected concentrations at the site. These calculations suggest that the risks associated with known concentrations of contaminants in soil are not zero, but are unlikely to present a significant risk to Site Workers or Construction Workers. *No additional work is required at this time based on the known test results and assumed future uses.*

Despite the possibility that the arsenic found is naturally occurring, it was still found to be in excess of the Iowa SWS. This fact may be an important consideration when planning future development of the site. Should the need arise to remove soil from this site for grading or other development and dispose of the soil offsite, guidance should be obtained from DNR or your consultant. Soils known to be elevated above a health standard cannot be removed and reapplied elsewhere without a plan. Additionally, DNR concurs with the consultant's recommendation that if contaminated soil and/or petroleum products are encountered during site work, the workers should immediately contact Kwik Trip, their consultant, and alert DNR. Additionally, please note that although your consultant stated so in the reports, the DNR has **not** made it a policy not to regulate arsenic concentrations that appear to be similar to background levels and will consider each site on a case by case basis.

The site information and reports have been reviewed as part of the Initial Site Screening (ISS) program. The site has been assigned a **Priority 3**, which constitutes a low level of concern.

If you have any questions or if we may be of further assistance, please contact me at [\(515\) 415-0889](tel:5154150889) or jake.bucklin@dnr.iowa.gov.

Sincerely,

Jake Bucklin
Environmental Specialist
Land Quality Bureau

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