March 7, 2024

TRAVIS VERACKA
DIRECTOR – GLOBAL ENVIRONMENTAL PROGRAMS
SEALED AIR CORPORATION
2415 CASCADE POINTE BOULEVARD
CHARLOTTE NC 28208

Re: Bi-annual Groundwater Monitoring Report
Former Cryovac Facility located at 1125 Wilson Ave SW, Cedar Rapids, Iowa

Mr. Veracka:

The Iowa Department of Natural Resources (Iowa DNR) has reviewed the Bi-annual Groundwater Monitoring Report dated March 1, 2024. The report outlines post-remedial groundwater sampling events completed in May and November of 2023, as well as bi-weekly free product recovery.

Injections were completed in 2020 in an attempt to limit down-gradient movement of chemicals of concern on the north side of the site (both shallow and deep groundwater generally flow to the northwest) and for treating an area of free product. Post-remedial groundwater sampling has been required on a semi-annual basis. In 2021, DNR noted that after initial injection events, additional actions may be required to address remaining risk pending sampling results (Document 38472).

Groundwater samples were analyzed for volatile organic compounds (VOCs) by EPA Method 8260. Select monitoring wells were sampled for total extractable hydrocarbons (TEH) by Iowa Method OA-2 and 1,4-dioxane by EPA Method 8260B SIM. Data tables contained in the present report note detections and exceedances for a number of industrial chemicals in groundwater.

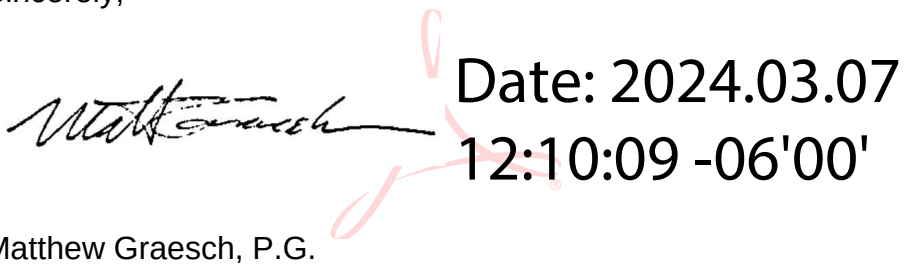
At this time, the plume does not appear to be stable as evidenced by highly variable concentrations of certain chemicals on both sides of the injected barrier. In some cases, it is unclear whether these chemicals are primary constituents, or are daughter products resulting from breakdown of chlorinated solvents.

An examination of plume stability for chemicals exceeding statewide standards is required. Use of statistical analysis techniques such as Mann-Kendall or confidence intervals is suggested. In addition, vapor sampling will be required to assess current soil gas and/or vapor intrusion risk to homes on the north side of Wilson Avenue post-remediation. The viability of vapor sampling point VP-1 is uncertain, and installation of a new vapor point, or use of existing wells such as MW-14, 15, 19, and 24 is suggested. Sealing the wellheads to prevent escape of gas prior to sampling for vapor will be necessary if existing wells are used. **Please submit a workplan for addressing vapor intrusion concerns in residential areas north of the site, and analyzing plume stability by May 10, 2024.**

Free-product recovery efforts have not yielded meaningful results since late 2021. **Free-product recovery may cease at this time**, though could be required in the future if site conditions change, or a new source of NAPL is discovered.

If you have any questions, or if we may be of further assistance, please contact me at matthew.graesch@dnr.iowa.gov or by phone at 515-250-1923.

Sincerely,



Matthew Graesch, P.G.
Environmental Specialist Senior
Land Quality Bureau

cc: Michael Sullivan
Iowa DNR
502 E 9th St
Des Moines, IA 50319
michael.sullivan@dnr.iowa.gov

Daniel Green, CGP
Terracon Consultants
2640 12th St
Cedar Rapids, IA 52404
Dan.Green@terracon.com