



REGION 7

LENEXA, KS 66219

Mr. Andrew Novetzke President
U.S. Nameplate Company, Inc. 2100 Highway 30 West
PO Box 10
Mt. Vernon, Iowa 52314
via email andrew@usnameplate.com

RE: Remedial Evaluation Report, Terracon Project No. 06157079
U.S. Nameplate Facility; Mt. Vernon, Iowa
EPA ID No. IAD054758958

Dear Mr. Novetzke:

The U.S. Environmental Protection Agency Region 7 has reviewed the Remedial Evaluation Report (RER) prepared by Terracon on your behalf and dated January 11, 2023. The referenced report was submitted in accordance with 1990 Administrative Order (Docket No. VII-90-F-0022). Based on a review of the above-referenced document, the EPA is providing the following comments that must be addressed prior to the EPA Approval:

1. Section 5 Corrective Action Objectives

No Corrective Action Objectives (CAOs) are identified. A discussion of many of the components of CAOs were discussed, but specific CAOs were not identified. Per the Resource Conservation and Recovery Act Facilities Investigation Remedy Selection Track, CAOs for remedy selection are medium-specific or unit-specific goals that a cleanup alternative must achieve to protect human health and the environment. These objectives should be as specific as possible, but not so specific that the range of alternatives that can be developed is unduly limited. CAOs should specify the following:

1. The contaminant(s) of concern
2. The exposure route(s) and receptor(s)
3. An acceptable contaminant level or range of levels for each exposure route.

Please reference the Resource Conservation and Recovery Act Facilities Investigation Remedy Selection Track, Tool 7 for additional guidance on corrective action objectives.

2. Section 5.5, Media Cleanup Standards

Per the Regional Screening Levels User's Guide, the target hazard quotient (THQ) table that is generally appropriate for screening multiple chemicals is the THQ=0.1 table. Please provide justification for utilizing the THQ=1.0 tables for the proposed soil cleanup standards with multiple noncancerous constituents of concern.

The EPA RSLs for Arsenic for Industrial Soil is 3 mg/kg. 3 mg/kg is reported in appendix E, but in section 5.5, 17 mg/kg is listed. Please explain this discrepancy. Dichloroethylene, cis 1,2 industrial soil EPA RSL has been adjusted to 370 mg/kg on November 18, 2022. If new information becomes available demonstrating that the cleanup standards in the Remedial Evaluation Report are no longer protective of human health and the environment, the updated MCLs and/or RSL values will be evaluated for incorporation into the remedy.

Several times the compliance point for vapor intrusion (VI) is listed as 6 feet below the slab for petroleum chemicals of concern and sub-slab air for other chemicals of concern. However, the media cleanup standards for VI is listed as the OSHA indoor air standards listed in 40 CFR 1910.1000. Please clarify how compliance with OSHA Air Contaminants will be demonstrated. Indoor air sampling has not been completed. Alternatively, based on the fact that a sub-slab depressurization system has already been installed and Johnson & Ettinger modeling completed, US Nameplate could evaluate vapor intrusion concerns utilizing vapor intrusion screening levels (VISLs) and conducting appropriate modeling (such as Johnson & Ettinger) as part of the long-term monitoring plan. This approach would not utilize a separate point of compliance for VI, but instead utilize the groundwater point of compliance. Groundwater VI constituents of concern would be monitored in a long-term monitoring plan and compared to VISLs. Should an exceedance of VISLs occur, VI modeling can demonstrate the increased VI risk.

3. Section 6.0 Remedial Strategy

Please clarify the following statement: “should an IC not be an available approach, a single well capture system at MW-14D would control/capture the dissolved contamination in this area of concern.” Is the institutional control (IC) in question the LRD Corp land use restriction? Please specify the trigger for pump and treat remediation. Additionally, has a treatability study or investigation into the effectiveness of pump and treat technology at the MW-14D location been conducted? What is the basis for the statement “a single well capture system at MW-14D would control/capture dissolved contamination”?

The RER places heavy emphasis on cost, but there is limited discussion about long-term effectiveness; toxicity, mobility and volume reduction; short-term effectiveness; implementability; community acceptance and state acceptance. The EPA recommends utilizing those balancing criteria when comparing multiple remedies that can achieve the three performance standards: protect human health and the environment; achieve media cleanup objectives; and control the sources of releases. Please provide a detailed analysis including the balancing criteria for each remedy that can achieve the performance standards in accordance with Section II Paragraph 13 and 14 to Attachment 2 of 1990 Administrative Order (Docket No. VII-90-F-0022).

Per OSWER Directive 9200.4-17, the EPA expects source control to be a fundamental component of any MNA remedy. As stated in sections 6.1 through 6.3, the source of the chemicals of concern is not controlled nor defined as those locations are now under buildings. As stated in section 6.0 demolition and excavation of the soils beneath the buildings would be costly and may unnecessarily expose workers to chemicals of concern. However, additional active remediation technologies including in situ chemical oxidation, in situ chemical reduction or in situ thermal treatment were not evaluated as

potential technologies for source control beneath the buildings. Please include an evaluation of these technologies.

4. Section 6.4.1 Lagoon Decommissioning

This section mentions two options were considered for lagoon decommissioning, but only one is presented. Please clarify the two options in this section or explain why only one is applicable. Section 8.4 identifies the recommended remediation strategy.

The EPA reviewed the fluid and sludge sampling conducted in accordance with the 2016 QAPP and Work Plan for Impoundment and Sump Sampling dated September 21, 2022. The sampling was reviewed in accordance with the June 22, 1990 Administrative Order. The EPA is providing acceptance of the sampling with the following conclusion:

Based on the most recent surface impoundment sampling the fluid and sludge in the surface impoundment does not exhibit the toxicity characteristic of hazardous waste. Based on this fact and the F006 delisting in 53 FR 37761, the project to close the surface impoundment may proceed as described in the referenced RER prior to final acceptance of this RER. The EPA recommends a work plan including solidification specifications, cap design, drainage operation, monitoring and maintenance plan, and project schedule be submitted for acceptance to the EPA.

Following approval of the RER, EPA will issue a Statement of Basis and Final Decision that addresses all SWMUs at the facility and ensures CAOs are met. Following public comment, EPA will select a final remedy and issue a Final Decision/Response to Comments. In selecting a final remedy EPA will take into account the circumstances present on the property, including any construction activities taken by the facility up to that point. EPA cannot approve corrective actions taken without following the RCRA corrective action process.

5. Section 7.1, Environmental Covenants for Soil and Groundwater

US Nameplate will be responsible for negotiating with LRD Corp for the environmental covenant. Failure to reach an agreement could result in a re-evaluation of the cleanup standards.

6. Section 7.3 VIMS for Air

The existing HVAC system (modified in 2012) was deemed sufficient by an HVAC contractor to prevent inhalation risks in each building except for the lower levels of addition 2 through positive indoor air pressure. HVAC systems typically vary operation temporally. Please describe the mechanism that will maintain positive pressure in building 1, addition 1 and addition 3 anytime an individual is present. Alternatively, US Nameplate could consider the monitoring and contingent modeling approach presented in section 2.

Please note if the VIMS installed in November 2019 is part of the final remedy selected by the EPA, it will be subject to operation, monitoring and maintenance plan (OMMP) which will require the EPA approval.

7. Section 7.7 and Section 8.3, Natural Attenuation Monitoring

Per the Technical Protocol for Evaluating Natural Attenuation of Chlorinated Solvents in Ground Water and OSWER Directive 9200.4-17, at least one of three lines of evidence should be utilized to justify monitored natural attenuation can achieve corrective action objectives in a reasonable timeframe. OSWER Directive 9200.4-17 line of evidence number 1 seems to be the most applicable line of evidence because microcosm studies and natural attenuation processes have not been identified. Please add a discussion of the “clear and meaningful trend of decreasing contaminant mass and/or concentration over time.” that makes monitored natural attenuation the appropriate remedial action approach for this site.

Per OSWER Directive 9200.4-17, the EPA recommends evaluating the need for contingency remedies when employing MNA. Based on the January 25, 2022, Well Installation and Groundwater Monitoring Report and the Remedial Evaluation Report, statistically certain conclusions cannot be drawn on the groundwater concentrations though a generally decreasing trend does exist. When uncertainty exists, OSWER Directive 9200.4-17 recommends evaluating contingency remedies and establishing triggers for those contingency remedies. Please provide a discussion on contingency remedies in accordance with OSWER Directive 9200.4-17 and provide triggers for the contingency remedies.

Acceptance of the RER will not constitute approval of the number and location of monitoring wells that will be considered as part of the monitoring natural attenuation well network, or frequency of submitting the data to the EPA. Further refinement of the monitoring well network and reporting requirements will be conducted during development of the Corrective Measures Implementation Work Plan. Contingency remedies and/or additional monitoring should be considered in the work plan as well as any proposal to abandon wells. The EPA does not support the closure of any of the monitoring wells prior to statistically significant trends being established. Please note MW-13, as recently as the January 25, 2022 Well Installation and Groundwater Monitoring Report, exceeded the MCL for TCE and likely will need continued monitoring.

8. General Comments

The EPA Region 7 will require annual remedy performance reports and five-year corrective measures performance evaluation (CMPE). The CMPE will document the effectiveness and performance of the selected remedy. It will include a discussion of the effectiveness of the corrective measures in protecting human health and the environment; a discussion on progress toward attaining site-specific media cleanup goals; and proposed modifications to the corrective measures to meet the goals of the approved remedy. Please provide a section on reports that will be included with the recommended remedy.

If you have any questions about the information in this letter, please contact me at (913) 551-7631 or by email at Herstowski.Ken@epa.gov. The EPA appreciates your continued cooperation in this matter.

Sincerely,

Kenneth Herstowski
Project Manager
Corrective Action Branch
Land Chemical & Redevelopment Division
Permitting and Partnership Section

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