

September 13, 2024

HOWARD BRAND
C6-ZERO IOWA LLC
REGISTERED AGENTS INC
315 E 5TH ST SUITE 202
WATERLOO IA 50703

Re: C6-Zero Iowa LLC (810 E South St, Marengo, IA 52301)
Contaminated Sites Database Site ID No. 2733
EPA Final Report Review and Continuing State Requirements

Dear Mr. Brand:

The Iowa Department of Natural Resources (DNR) received the Final Report submitted on behalf of C6-Zero Iowa LLC (C6-Zero) to the United States Environmental Protection Agency (U.S. EPA) on June 15, 2024 ([Doc #41861](#)). DNR received U.S. EPA approval of the report on July 10, 2024 ([Doc #41862](#)) and transfer of regulatory authority to the DNR was completed thereafter. DNR has now resumed its oversight as lead agency at this site. The purpose of this review is to ensure that DNR requirements have been satisfied in accordance with Emergency Order No. 2022-HC-02/2022-AQ-25/2022-SW-20/2022-WW-32 ([Doc #40237](#)).

Up to this point, soil removal has been the main focus of the work at the site. At this time, additional actions are required to document groundwater concentrations, establish plume boundaries, and ensure no offsite impacts to groundwater. Please submit a supplemental site assessment plan in accordance with [567 IAC 133.4\(3\)](#) by **November 15, 2024**. While reviewing past submittals to EPA, the following issues were noted and need to be incorporated into the supplemental assessment activities:

1. Additional groundwater monitoring is required to establish the source area dynamics and delineate boundaries of the contaminant plumes. Please design the monitoring scheme to ensure plume definition and source location can be monitored for stability. Additional well installation may be required to define the plumes to protected groundwater source (PGWS) standards. Past onsite analyses show both VOC and PFAS in soil and groundwater. Please include EPA Methods 8260 and 1633 and Iowa Method OA-2 in the sampling plan. Soil samples will be required at any future monitoring well locations.
2. The Removal Site Assessment submitted to the EPA ([Doc #41369](#)) reads, "As stated earlier, according to the IDNR Facility Explorer database, there is one (1) water well located within 1,000 feet of the site. IDNR Well No. 61838 is reportedly located 267 feet from the subject site and is relatively shallow (reported at 37 feet deep). The actual well location was not identified as part of this assessment." Please conduct a pedestrian well survey within 300 feet of the source area. Please sample existing wells found within this radius to ensure there has been no impact from the release.
3. Many of the soil comparison criteria used during the Removal Investigation were based on worker exposure. It is the understanding of DNR that the site is currently industrial; however, in order to use non-residential standards an environmental covenant prohibiting residential use will be required before the site can be

closed. Please note that the use of an environmental covenant restricting well installation/groundwater use may also assist closure if the groundwater plume is found to be onsite and stable.

There are also Solid Waste requirements that remain outstanding. As outlined in Emergency Order No. 2022-HC-02/2022-AQ-25/2022-SW-20/2022-WW-32, DNR determined that the shingles onsite were not being legitimately recycled pursuant to Iowa Code section [455D.4A](#) and were subject to solid waste regulations. Under Section V.4 of the Emergency Order, C6-Zero was ordered to, "... properly dispose of all shingles, remaining shingle components, and all related solid waste." A DNR compliance inspection was performed on August 26, 2024 at which time the shingles were documented to remain onsite along with other miscellaneous solid waste on the exterior of the building. The shingles and all other miscellaneous solid waste onsite needs to be properly disposed of in accordance with the Emergency Order No. 2022-HC-02/2022-AQ-25/2022-SW-20/2022-WW-32 once the stay has been lifted.

Again, please submit a supplemental site assessment plan by **November 15, 2024**. For questions related to the groundwater assessment, please contact Shelly Nellesen with any questions at [\(515\) 669-5494](tel:5156695494) or by email at shelly.nellesen@dnr.iowa.gov. If you have questions related to shingle disposal, and disposal of all other solid waste, please contact me at [\(515\) 360-1671](tel:5153601671) or by email at mike.sullivan@dnr.iowa.gov.

Sincerely,

Michael Sullivan
Solid Waste and Contaminated Sites Supervisor
Land Quality Bureau

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