IOWA DEPARTMENT OF NATURAL RESOURCES

GOVERNOR KIM REYNOLDS
DIRECTOR KAYLA LYON

October 31, 2024

ND XLIV LLC
MARTIN HUANG
9090 SKILLMAN ST #182A-269
DALLAS TX 75243

Re: ESCP Corporation (1833 W 2nd St, Davenport, IA 52802)
Contaminated Sites Database Site ID No. 2670
Additional Site Assessment Report Response

Dear Mr. Huang:

The Iowa Department of Natural Resources (DNR) has reviewed Land Recycling Program (LRP) Additional Site Assessment Report received on September 18, 2024 by Hyde Environmental, Inc (HEI) (Doc# 42011) on behalf of ESCP Corporation (ESCP). Sampling was requested by DNR to investigate any possible offsite contaminate migration and delineate contamination plumes.

The additional site assessment resulted in HEI installing of three (3) new monitoring wells (wells) for a total of seven (7) wells onsite. Groundwater samples were collected from all seven (7) wells. Five (5) soil gas samples were also collected along the south and southeast property boundary. Groundwater results indicate the plume may be leaving the property; however, offsite access was denied.

During the April 2024 sampling events elevated levels of cis-1,2-dichloroethene (cis-1,2-DCE) were observed in MW-2 (0.0212 mg/L) and MW-7 (0.234 mg/l) above the Iowa DNR Statewide Standard (SWS) for protected groundwater (SWS PGWS) of 0.07 mg/L. Trichloroethene (TCE) was above SWS PGWS of 0.005 mg/L in MW-2 (0.0768 mg/L), MW-3 (0.00479), MW-6 (0.0319 mg/L), and MW-7 (0.00753 mg/L). MW-4, at a concentration of 0.0729 mg/L, was above SWS for non-protected groundwater (NPGWS) for TCE of 0.061 mg/L. The previously sampled wells MW-1, MW-2, MW-3 showed a decrease in concentrations from the previous sample event in July 2022.

During the April 11, 2024 soil gas sample SG-001 was above the U.S. Environmental Protection Agency's vapor intrusion screening level (EPA VISL) for 1,3-Butadiene of 13.6 µg/m^3 with a concentration of 15 µg/m^3. Sample SG-002 exceeded the EPA VISL for carbon tetrachloride of 68 µg/m^3 with a concentration of 4100 µg/m^3, chloroform (EPA VISL 17.8 µg/m^3) with a concentration of 370 µg/m^3, and TCE (EPA VISL 29.2 µg/m^3) at a concentration of 5000 µg/m^3.

Indoor air samples were collected in August 2021 and March 2022 in areas with elevated soil vapor concentrations. These samples showed elevated levels of chloroform, TCE, tetrachloroethene (PCE), and naphthalene. While elevated none exceeded US EPA commercial air screening levels (CASLs), the

Iowa DNR LRP Cumulative Risk Calculator (CRC) results should be included as part of the Risk Evaluation/Response Action (RE/RA).

The assessment is accepted. The RE/RA (outlined in 567 IAC 137.9) is due January 30, 2025. Aside from all required components outlined in the rule, please additionally include evidence that offsite access was denied.

Please remember, as part of the LRP a minimum of two (2) years of quarterly groundwater sampling data is required to ensure groundwater concentrations are stable or declining. Please begin the quarterly monitoring of all available wells and submit the first annual monitoring report by November 15, 2025. The previous April, 2024, sample event can be included as one of the quarterly requirements.

If you have any questions or need further information please feel free to contact me at 515-415-1331 or by email at brad.davison@dnr.iowa.gov.

Sincerely,

Digitally signed by
Bradley Davison
Date: 2024.10.31
11:41:48 -05'00'

Brad Davison
Environmental Specialist
Land Quality Bureau

cc: Jim Lindemann
Hyde Environmental, Inc
W175 N11163 Stonewood Dr Ste 110
Germantown, WI 53022
jclindemann@hyde-env.com

Michael Sullivan
Iowa DNR
6200 Park Ave, Suite 200
Des Moines, IA 50321
michael.sullivan@dnr.Iowa.gov

Iowa DNR Field Office #6, Washington
kurt.levetzow@dnr.iowa.gov