

December 18, 2024

MS DESSIE REDMOND  
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**Re: Reliance Battery (813 22<sup>nd</sup> Avenue, Council Bluffs, IA 51501)  
Contaminated Sites Database Site ID No. 1311  
Additional Site Investigation Work Plan, Risk Evaluation/Response Action Report, and Site Specific  
Cleanup Plan**

Dear Ms. Redmond:

The Iowa Department of Natural Resources, Solid Waste and Contaminated Sites Section (DNR) has reviewed the November 21, 2024 Additional Site Investigation Work Plan for Surrounding Properties (Work Plan)([Doc #42172](#)), the November 21, 2024 Risk Evaluation/Response Action Report (RE/RA)([Doc #42173](#)), and the December 6, 2024 Site Specific Cleanup Plan ([Doc #42177](#)) for the Reliance Battery Site located in Council Bluffs, Iowa. DNR understands that the city intends to achieve a No Further Action Certificate (NFA) for the site in order to redevelop the site for residential use. DNR has the following comments on the documents:

**Work Plan**

- Table 3 – Soil Sampling Plan and Figure 2 – Sample Locations: Table 3 and the associated text describe the designated labels for the proposed sampling locations as B19-B37 while Figure 2 depicts the labels for the proposed sample locations as B1-B19. Please clarify.

**Cleanup Plan**

- 2. Clean-up monitoring of the Property ensuring soil is disposed of according to project specifications: The text describes confirmation sampling frequency and proposes approximately 10 confirmation samples. IAC 137.10(2) specifies:

“Minimum sample numbers for the demonstration of compliance with the background standard for soils (paragraph 137.10(4)“b”) or with the statewide standard when applying subparagraph 137.10(5)“a”(1) shall be based on the volume of soil to which the selected standard is being applied as follows:

- (1) For volumes less than or equal to 125 cubic yards, a minimum of 8 samples.
- (2) For volumes greater than 125 cubic yards, but less than or equal to 3,000 cubic yards, a minimum of 12 samples.
- (3) For each additional volume of less than or equal to 3,000 cubic yards, a minimum of 12 additional samples.
- (4) Additional samples may be required based on site-specific conditions.”

Based on the estimate in the cleanup plan of 4,615 cubic yards of soil to be removed, a minimum of 24 confirmation samples would be required to demonstrate compliance. Please revise to align confirmation sampling with these requirements.

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](mailto:jake.bucklin@dnr.iowa.gov).

Sincerely,

Jake Bucklin  
Environmental Specialist  
Land Quality Bureau

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