



## REGION 7

LENEXA, KS 66219

Shelly Nellesen  
Environmental Specialist Sr.  
Solid Waste and Contaminated Sites Section  
Iowa Department of Natural Resources  
6200 Park Ave  
Des Moines, Iowa 50321

Dear Ms. Nellesen:

The U.S. Environmental Protection Agency has begun discussions with Iowa Department of Natural Resources (IDNR) to transfer the White Farm Equipment Co. Dump superfund site to the state for long-term Operation & Maintenance (O&M). Allied Products Corporation filed for bankruptcy in 2000, and the EPA received a settlement of \$16,000.00 in 2003 to cover future remedial costs. The EPA has been the lead agency for the past 21 years and has spent \$55,544.93 for remedial at the site. A Superfund State Contract with the State of Iowa was not completed; therefore, the state has not been paying a 10% cost share for remedial activities for the site. The Comprehensive Environmental Response, Compensation and Liability Act, Section 104(c)(6), provides the statutory basis for the transfer of ground water and surface water restoration projects from the EPA to State O&M. The National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40CFR§300.435(f)(3), states, "for fund-financed remedial actions involving treatment or other measures to restore ground water or surface water quality to a level that assures protection of human health and the environment, the operation of such treatment or other measures for a period up to ten years after the remedy becomes operational and functional (O&F) will be considered part of the remedial action. Activities required to maintain the effectiveness of such treatment or measures following the ten-year period, or after the remedial action is complete, whichever is earlier, shall be considered O&M." The EPA defines the ten-year period between the O&F determination and the start of O&M as a long-term response action (LTRA) and federal funding is still provided as it was for the remedial action. If cleanup goals have not been achieved upon completion of the 10 years, the remedy transitions into O&M to be conducted by the State. Federal funds cannot be used to conduct O&M. Following is a summary of the site and important response actions.

The White Farm Equipment Co. Dump superfund site is located along the northern edge of Charles City in Floyd County, Iowa. The site occupies approximately 20 acres at the southeast corner of Kellogg Avenue and Rotary Park Road. The site is covered by a vegetated soil cap and is sloped to provide runoff. Current land use of the property is a hay field. The site drains to the wetlands northwest and south of the site and ultimately the Cedar River. The Cedar River is approximately 2,200 feet west-southwest of the site. Site maps showing the limits of the cap and locations of monitoring wells are provided in enclosed figures (ClearPath Consultants, 2023).

White Farm Equipment Company operated the disposal site on this property, which it leased from H. E. Construction Company in 1971. White Farm Equipment Company began disposing of foundry sand, bag house dust and other industrial wastes at the site. Disposal activities ended in 1985 with an estimated 650,000 cubic yards of wastes disposed on the site.

The following monitoring wells are associated with the site: WFE-5A, WFE-5B, WFE-6B, WFE-7AR and WFE-7BR. The monitoring wells were last sampled in June 2023 by ClearPath Consultants. The groundwater was analyzed for VOCs, semi-volatiles and metals. Based on groundwater sampling data, there are no detections of groundwater COCs above their respective MCL values. In agreement with IDNR, the site will be sampled once every 10 years and will coincide with a Five-Year Review.

ClearPath Consultants inspected the landfill cap in 2023. During the inspection, no erosional features were observed, the site was completely vegetated, and no bare soil areas were observed. An environmental covenant is in place to maintain the cap to prevent direct contact with the landfill materials, to reduce infiltration and leaching of contaminants and to minimize runoff transport of contaminants.

#### Response Actions:

- 1984 - IDNR required the White Farm Equipment Company to install monitoring wells for assessing whether environmental impacts from disposal activities had occurred.
- 1985 - EPA performed a Preliminary Assessment of the site. The EPA found wastes in contact with ground water at a depth of five to 10 feet below ground surface.
- 1990 - The site was added to the National Priorities List.
- 1990 - The remedial investigation, feasibility study and risk assessment were to identify the nature and extent of contamination at the site.
- 9/28/1990 - A Record of Decision was signed.
- 1992 - An Explanation of Significant Differences was signed.
- 10/5/1992 - A restrictive covenant for the property was recorded and filed in Floyd County.
- July 1994 to June 1995 - Remedial action construction activities consisted of installing a compacted cap, constructing ditches and a sedimentation basin, vegetating the cap, installing the perimeter fencing and instituting deed restrictions.
- 9/8/1995 - Construction completion was achieved when the Site Closeout Report was issued.
- 2000 - Allied Products Corporation filed for bankruptcy.
- 10/30/2000 – Site was deleted from the National Priorities List.
- 10/16/2009 - The restrictive covenant was replaced by an environmental covenant.
- 2023 - ClearPath Consultants conducted a site inspection of the landfill cap and replaced monitoring wells.

If you have any questions, I can be reached at (913) 551-7242 or [pfannenstiel.stephanie@epa.gov](mailto:pfannenstiel.stephanie@epa.gov).

Sincerely,

Stephanie Pfannenstiel  
Remedial Project Manager  
Site Remediation East Section  
Superfund Emergency Management Division

Enclosures: Figures

Figure 1-1 Site Location Map



Figure 3-1 Monitoring Well Locations

