

March 12, 2025

TIM RYPMA
THE DISTRICT DEVELOPER LLC
350 E LOCUST ST STE 500
DES MOINES IA 50309

Re: Scrap Processors Warehouse (306 SE 5th St, Des Moines, IA 50309)
Contaminated Sites Database Site ID [No. 2836](#)
Limited Site Investigation and Supplemental Investigation Reports; PCB Detections

Dear Mr. Rypma:

The Iowa Department of Natural Resources, Solid Waste and Contaminated Sites Section (DNR) received three documents related to your property: a Phase I Environmental Site Assessment Report ([Doc #42355](#)), a Limited Site Investigation Report ([Doc #42356](#)), and a Supplemental Investigation Report ([Doc #42358](#)). The reports were completed in 2018, and received on February 28, 2025. Terracon Consultants Inc. has prepared and submitted the reports on behalf of 306 SE 5th Street, LLC. The property is intended for potential redevelopment into multi-family dwellings.

The Phase I Environmental Site Assessment Report notes several recognized environmental conditions, and recommends further investigation to assess possible impacts to groundwater and soil related to use of the site and surrounding properties for industrial activities, including processing scrap metal, which was ongoing for many years. The Limited Site Investigation Report details findings in soil and shallow groundwater that are consistent with use of the property for scrap metal processing; metals, heavy petroleum, polyaromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs). Of the detected contaminant types, all but petroleum compounds exceeded statewide standards for soil in at least one location. Detections, but no exceedances were noted in shallowest encountered groundwater samples.

Petroleum, metal, and PAH contaminants will be handled by DNR. Since they are Toxic Substances Control Act (TSCA) listed chemicals, all PCB detections exceeding a standard must be reported to EPA Region 7. DNR reported the occurrence to Annah Murray, EPA Region 7 PCB Coordinator on March 3, 2025. Your consultant was copied on the communication, and a subsequent response was received from EPA providing information regarding what is required related to PCBs. Coordinating with EPA on PCB removal actions will be especially important given that future site use is intended to be residential.

The Supplemental Investigation states, "If a hazardous condition exists, the owner/operator is required to report it. The soil concentrations for this investigation exceed the SWS; however, Terracon does not believe that a hazardous condition exists." DNR seeks to clarify in this correspondence that a hazardous

condition does exist at this site and this should have been reported to DNR in 2018 when this report was generated. If, in the future, there are questions as to whether sample results indicate whether a hazardous condition exists, or not, the Terracon and/or the owner/operator should consult with DNR.

The site no longer has a fence surrounding it preventing direct contact between people and (contaminated) soil. In addition, it appears that there may have been some disturbance of the soil on site. Disturbance of contaminated soil constitutes a "generation event", and the site owner will need to make a RCRA waste determination regarding the soil. Please refrain from any additional activities that disturb or move soil (potentially containing PCBs) until a determination has been made. Please contact Susan Johnson (DNR), who is copied on this communication regarding how to make a RCRA waste determination.

DNR will review the reports for non-PCB contaminants, and will issue a letter regarding requirements related to these analytes and risks. The PCB contaminants will be handled by EPA Region 7, and DNR should be copied on communications related on PCBs. The site will remain in "open" status until EPA requirements are satisfied, and the site has been fully transferred back to DNR. EPA will likely require additional sampling to better define the volume and location(s) of soil exceeding a standard for PCBs. It may be most efficient and/or cost effective to work with DNR to decide what additional testing should be done at the same time for non-PCB contaminants. This is especially true if EPA requires active soil remediation (such as an excavation). If you wish to consider enrolling this site in the DNR Land Recycling Program and a No Further Action Certificate, please contact the DNR project manager for more information.

If you have any questions, or if we may be of further assistance, please contact me at matthew.graesch@dnr.iowa.gov or by phone at [\(515\)250-1923](tel:5152501923).

Sincerely,

Matthew Graesch, P.G.
Environmental Specialist Senior
Land Quality Bureau

cc: Michael Sullivan
Iowa DNR
6200 Park Ave, Suite 200
Des Moines, IA 50321
mike.sullivan@dnr.iowa.gov

Susan Johnson
Iowa DNR
6200 Park Ave, Suite 200
Des Moines, IA 50321
susan.johnson@dnr.iowa.gov

DNR Field Office 5, Des Moines
ted.petersen@dnr.iowa.gov

Annah Murray
EPA Region 7 PCB Coordinator
11201 Renner Blvd.
Lenexa, KS 66219
Murray.Annah@epa.gov