

April 2, 2025

CITY OF KEOKUK
C/O PAM BROOMHALL
501 MAIN ST
KEOKUK IA 52632

Re: **Elkem Parcel D, 365 Carbide Ln., Keokuk, IA 52632**
Contaminated Sites Database ID No. 2842
Land Recycling Program Enrollment Application and Participation Agreement

Dear Ms. Broomhall:

The Iowa Department of Natural Resources, Solid Waste and Contaminated Sites Section (Iowa DNR) received the Land Recycling Program (LRP) Enrollment Application and Participation Agreement (PA) on February 28, 2025. The site is approved for enrollment. It is understood the focus of this enrollment is to evaluate risk associated with soil and groundwater contamination existing at a portion (Parcel D) of the Elkem facility. Enrollment information indicates future site use as industrial/commercial. The information related to assessment has not been formally reviewed at this time. This letter is focused on the enrollment information provided for the LRP. It is understood that the 'site' is defined by source area (not parcels), as discussed during previous meetings with the City and consultants. The following comments were noted during review of the enrollment material:

- 1) Please note, Attachment E4 incorrectly states excavated soil from remedial efforts will be disposed of at the onsite closed landfill. This issue was discussed with your consultant and it was understood that this is not approved. Any excavated soil will need to be properly disposed of.
- 2) Attachment E4 indicates 33,150 cubic yards of soil are expected to be excavated at this site. The same volume is noted in the enrollment application for the adjoining Plat 1 site. It is unclear if this volume is expected to be removed from each site or if the estimated volume is a combination of the two sites.
- 3) Attachment E2 indicates a geothermal system will be considered in future redevelopment. Obtaining a permit to construct these systems in areas of contaminated groundwater is often difficult and requires close examination to ensure the borings do not pose a risk of impacting additional aquifers.
- 4) Please note, eight quarters of groundwater monitoring is required after remedial efforts are complete in accordance with [567 IAC 137.10\(3\)](#). This requirement was not included as part of Attachment E3 of the Enrollment Application, nor the updated Section V of the Participation Agreement. While these documents are not required to be updated and resubmitted, please note that the No Further Action (NFA) date of January 2026 will likely be delayed in order to meet all requirements of the program.
- 5) As with any site, if further review indicates additional chemicals of concern (COCs) pose a risk at the site, those COCs will be required to become part of the assessment and remedial efforts.

Please include a cover letter with your next submittal that addresses or acknowledges each comment. Jake Bucklin will be the Iowa DNR Project Manager for this site. It is understood that the assessment has already taken place. As such, the next step in the LRP process is to submit the site assessment within 45 days. I would

encourage you to reach out to him to discuss the site specifics issues. You can contact him at [515-415-0889](tel:515-415-0889) or by email at jake.bucklin@dnr.iowa.gov.

Sincerely,

Shelly Nellesen
Environmental Specialist Senior
Solid Waste & Contaminated Sites Section
Iowa Department of Natural Resources
Shelly.Nellesen@dnr.iowa.gov
[\(515\) 669-5494](tel:515-669-5494)

ATCH: Signed LRP Enrollment Application and Participation Agreement

cc: Michael Sullivan
Iowa DNR Solid Waste
6200 Park Ave Suite 200
Des Moines, IA 50321

Iowa DNR Field Office #6, Washington