



REGION 7

LENEXA, KS 66219

Ms. Amie Davidson
Bureau Chief, Land Quality Bureau
Iowa Department of Natural Resources
502 East 9th Street
Des Moines, IA 50319

Letter sent electronically to: amie.davidson@dnr.iowa.gov

RE: Partial Referral of the Elkem Carbide RCRA Facility, Keokuk, Iowa to a Non-RCRA Authority
EPA ID No. IAD005267588

Dear Ms. Davidson:

The U.S. Environmental Protection Agency has determined, based on review of documents and information provided by the State of Iowa facility project manager and the facility owner, the City of Keokuk, that two parcels of the Elkem Carbide RCRA facility have been enrolled in the State of Iowa's Land Recycling Program. These parcels are described in the attachments to this letter, and the EPA has designated a new sub-area of the facility in the RCRAInfo database titled "LRP Parcels" that represents these parcels. Investigation and cleanup, as necessary, of the LRP Parcels under the LRP will satisfy corrective action obligations under the federal Resource Conservation and Recovery Act, as outlined in the EPA's letter to Cole O'Donnell of the City of Keokuk dated September 28, 2023, which is also attached to this letter. Therefore, the LRP Parcels portion of the Elkem Carbide facility is hereby assigned a CA2100T code in the RCRAInfo database, indicating that this portion of the facility has been referred to a non-RCRA authority (the IDNR) for investigation and any necessary future corrective action. If the City of Keokuk subsequently withdraws the LRP Parcels from the LRP, the EPA would consider re-establishing its oversight of the LRP Parcels at that time.

Please contact me with any questions at (913) 551-7324, or via e-mail at Gravatt.dan@epa.gov.

Sincerely,

Daniel Gravatt, P.G.
Permitting and State Partnerships Section
Land, Chemical and Redevelopment Division

Attachments

cc: Pam Broomhall, Community Development Director, City of Keokuk
Shelley Nellesen, IDNR
Mel Pins, IDNR