

May 12, 2025

JACOB WALLEN
VITERRA USA GRAIN LLC
1331 CAPITOL AVE
OMAHA NE 68102

**Re: Gavilon Grain/Viterra (635 E Commercial St., Dubuque, IA 52001)
Contaminated Sites Database Site ID No. 2781
Review of Site Assessment Report**

Dear Mr. Wallen:

The Iowa Department of Natural Resources (IDNR) has reviewed the Site Assessment (SA) Report ([Doc# 41920](#)) and SA Addendum Report ([Doc# 41921](#)) for the Gavilon Grain/Viterra Site at 635 E Commercial Street, Dubuque, IA 52001. Thank you for the submissions. The SA Report details soil and groundwater investigation completed at the Site between May and June 2024 as part of the IDNR Land Recycling Program (LRP) assessment.

Based on the SA Report, the site has been used for both dry fertilizer and grain storage historically, but recently dry fertilizer storage has been discontinued at the facility. Strong ammonia odors were observed during demolition activities in 2023. Soil samples were collected at the time which indicated shallow surface ammonia contamination, but at levels under the Iowa Statewide Standard (SWS). Groundwater samples were later collected which confirmed ammonia standards exceedance within site property boundaries. Additional contaminant plume delineation and site lithology investigation was recommended.

2024 assessment activities included completion of twelve direct push borings to depths ranging between 72-93' bgs. A hydraulic profiling tool and an electrical conductivity sensor were used in the borings to gather hydrogeological data for the site. Eight (8) soil samples were collected and analyzed only for nitrate/nitrite (N-N) as ammonia sampling was completed during initial investigation activities in 2023. Soil N-N concentrations were found to be less than standards. In total, 32 groundwater samples were collected from multiple depths to vertically and horizontally delineate the ammonia and N-N plumes. The Protected Groundwater Source (PGWS) standards for ammonia and nitrate were exceeded at all four sample depth zones, excluding nitrate at the 18-22' interval. Nitrite concentrations exceeded the PGWS standard at only one location, GW-8B (38-42' bgs). The recommendation to begin evaluating remedial options, including pilot testing, was approved by the DNR via email correspondence in November 2024.

Additionally, the SA Addendum Report provides an overview of identified receptors and possible risk pathways associated with the site. The primary risk pathway is ammonia and nitrogen compounds present in on-site soils leaching to groundwater. While groundwater is contaminated at the site, contaminant plumes appear to be confined to within the site boundaries and drinking water wells in the vicinity do not appear to be at risk.

Please proceed with pilot testing to determine the remedial action to be utilized. Additionally, please provide a list of adjacent property owners with mailing address. The DNR will send the first public notice once those are received. Contact me with any questions at [\(515\) 721-7024](tel:5157217024) or by email at andrew.carver@dnr.iowa.gov.

Sincerely,

Andrew Carver, CGP
Environmental Specialist
Land Quality Bureau

cc: Iowa DNR Field Office #1,
Manchester, IA

Michael Sullivan
Iowa DNR
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