

May 6, 2025

HOWARD BRAND  
C6-ZERO IOWA LLC  
REGISTERED AGENTS INC  
315 E 5<sup>TH</sup> ST SUITE 202  
WATERLOO IA 50703

**Re: C6-Zero Iowa LLC (810 E South St, Marengo, IA 52301)  
Contaminated Sites Database Site ID No. 2733  
Supplemental Site Assessment and Addendum**

Dear Mr. Brand:

The Iowa Department of Natural Resources (DNR) received the Supplemental Site Assessment ([Doc #42522](#)) submitted on behalf of C6-Zero Iowa LLC (C6-Zero) on April 25, 2025 and a Supplemental Site Assessment Addendum ([Doc #42536](#)) submitted on May 1, 2025. The assessment generally follows the environmental investigation proposed in the Site Assessment Workplan ([Doc #42143](#)). The six onsite wells were sampled during the March 2025 fieldwork and an additional eight soil borings with permanent and temporary monitoring wells were installed and sampled. The offsite drinking water well was also sampled as part of the assessment. Samples were analyzed for semi-volatile organic compounds (sVOCs) via EPA Method 8270, volatile organic compounds (VOCs) via EPA Method 8260, per- and polyfluoroalkyl substances (PFAS) via EPA Method 1633, and Total Extractable Hydrocarbons (TEH) via Iowa Method OA-2.

The following issues were noted during review.

- 1) *Section 3.5 Groundwater Sampling* states 'Prior to groundwater sampling, the depth to water level measurements were collected from each monitoring well using a Geotech® water meter probe that is accurate to +/- 0.1 feet according to the manufacturer.' However groundwater data on the Monitoring Well Construction Diagram is reported to 0.01 ft. Please clarify which is accurate and if correction is needed on diagrams please include that in the next report.
- 2) *Sections 3.2 Soil Borings and Soil Sampling* and *3.5 Groundwater Sampling* do not state that PFAS-free water and equipment were used for sampling. Since PFAS is part of the investigation at this site, PFAS-free water and sampling equipment must be used. Please be sure to use PFAS-free water and equipment in the future when working on this investigation and include this detail in future reports.
- 3) Groundwater concentrations listed in *Table 3 Groundwater Analytical Results, Appendix A-Exhibit C Chemical Concentration Map, and Appendix D-Exhibit B Groundwater Analytical Data Table* of the Supplemental Site Assessment do not reflect the concentrations listed in the lab reports. This was corrected in the Supplemental Site Assessment Addendum.
- 4) The reporting limits for some chemicals of concern were higher than applicable standard. In the future, please ensure the laboratory is able to meet appropriate reporting limits.

Additional groundwater monitoring is required to fully delineate the plume and establish plume dynamics. The monitoring network needs to be expanded to include permanent perimeter wells to the east, north, and northwest of the plume area. At a minimum, two years of semi-annual groundwater monitoring is required to

demonstrate a stable/declining plume. If, after two years, the plume area is delineated onsite and a stable/declining plume can be documented, an environmental covenant restricting well installation and property use may be considered as a path towards closure as mentioned in *Section 6.0 Conclusions and Recommendations*.

There are also Solid Waste requirements that remain outstanding. As outlined in Emergency Order No. 2022-HC-02/2022-AQ-25/2022-SW-20/2022-WW-32 (Emergency Order), DNR determined that the shingles onsite were not being legitimately recycled pursuant to Iowa Code section 455D.4A and were subject to solid waste regulations. Under Section V.4 of the Emergency Order, C6-Zero was ordered to, "... properly dispose of all shingles, remaining shingle components, and all related solid waste."

During an April 14, 2025 meeting with EcoSource, LLC, DNR determined that the following items remain outstanding in order to demonstrate compliance with the solid waste disposal requirements of the Emergency Order:

- Approximately 3,500 gallons of rinse/contact water from tank cleaning activities remains on-site. EcoSource indicated that they were working toward completion of this item by May 1, 2025, but DNR requires verification.
- One (1) 15,000 gallon steel tank with approximately 1,500 gallons of diesel product remains on-site.
- Three (3) 12,000 gallon tanks of oil contact water remain on-site.
- Soybean oil tanks remain on-site.
- Bags and other miscellaneous solid waste remains on-site.
- The waste shingles are no longer on-site, but DNR has not been made aware of where they were moved to and if they were properly disposed of. Documentation is required from C6-Zero to verify that the shingles were properly disposed of in compliance with the Emergency Order.

Please promptly submit a proposed monitoring plan. Additionally, please immediately complete the remaining solid waste disposal requirements and provide documentation of proper disposal. For questions related to the environmental assessment or future monitoring requirements, please contact Shelly Nellesen with any questions at [\(515\) 669-5494](tel:5156695494) or by email at [shelly.nellesen@dnr.iowa.gov](mailto:shelly.nellesen@dnr.iowa.gov). If you have questions related to shingle disposal, and disposal of all other solid waste, please contact me at [\(515\) 360-1671](tel:5153601671) or by email at [mike.sullivan@dnr.iowa.gov](mailto:mike.sullivan@dnr.iowa.gov).

Sincerely,

Michael Sullivan  
Solid Waste and Contaminated Sites Supervisor  
Land Quality Bureau

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