

July 22, 2025

HOWARD BRAND
C6-ZERO IOWA LLC
REGISTERED AGENTS INC
315 E 5TH 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
Proposed Groundwater Monitoring Work Plan**

Dear Mr. Brand:

The Iowa Department of Natural Resources (DNR) received the Proposed Groundwater Monitoring Work Plan ([Doc # 42657](#)) submitted on behalf of C6-Zero Iowa LLC (C6-Zero) on May 19, 2025. The work plan was received in response to the Iowa DNR's review of the Site Assessment Addendum ([Doc# 42536](#)). The report proposes installing an additional four wells to bracket the plume. Monitoring will consist of the seven existing wells and the four additional wells for a minimum of two years before further responses will be employed. Samples are proposed to be 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. Annual reporting is proposed. The proposed plan generally meets the requirements set forth in the Iowa DNR review letter; however, some considerations must be incorporated into a revised plan before moving forward:

1. As a reminder, please ensure the laboratory is able to meet the all applicable standards.
2. *Section 3.3 Monitoring Well Location* states that additional wells may be necessary to further bracket any soil, groundwater, or contaminate plume(s) that are identified during field operations. The DNR agrees with this statement. If wells are installed and the plume remains (or becomes) undefined, additional wells may be required.
3. *Section 1.0 Introduction* states that data collected onsite will be utilized to determine if an environmental covenant prohibiting residential use may be required prior to site closure. Please note, the addition of a well installation prohibition is usually included where contamination remains at time of closure.
4. *Appendix A, Exhibit B* is a map depicting proposed monitoring well locations. It is the understanding of the Iowa DNR that the proposed wells are to ensure data collection to prove that the plume is not only stable but also remains on the property. At present, the proposed locations will not serve this purpose. In order to ensure plume stability onsite, installation of wells off property may be required.

- a. MW-13 should be positioned to the east of MW-3 due to past groundwater concentrations and proximity to the property boundary.
- b. MW-10 should be positioned to the west of its current proposed location (in the corner of the property near the former TMW-1 location) in order to monitor groundwater concentrations at the property line.
- c. MW-11 should be positioned north of MW-6 to ensure plume migration is monitored offsite.

Please submit a revised proposed monitoring plan within 45 days. For questions related to groundwater monitoring requirements, please contact Shelly Nellesen with any questions at [\(515\) 669-5494](tel:5156695494) or by email at shelly.nellesen@dnr.iowa.gov.

Sincerely,

Shelly Nellesen
Solid Waste & Contaminated Sites
Land Quality Bureau

cc: Tim Dore
C6-Zero Iowa LLC
Registered Agents, Inc.
315 E 5TH St, Suite 202
Waterloo, IA 50703

Darren Fife
EcoSource, LLC
6424 University Ave
Windsor Heights, IA 50324

Michael Kuehner
Zenor Law Firm, PLC
111 E Grand Ave, Ste 400
Des Moines, IA 50309

David S. Steward
Office of the Attorney General of Iowa
1305 E Walnut St
Des Moines, IA 50319

Iowa DNR Field Office #6, Washington