

July 15, 2025

KEVIN KOELLNER
KDRG LLC
1805 STATE STREET SUITE 101
BETTENDORF IA 52722

**Re: Adel Building and QCA Spas Bettendorf (131 12th Street and 208 13th Street, Waterloo, Iowa)
Contaminated Sites Database Site ID [No. 2853](#)
Limited Site Investigation and Additional Requirements**

Dear Mr. Koellner:

The Iowa Department of Natural Resources, Contaminated Sites Section (Iowa DNR), has reviewed the above referenced Limited Site Investigation, along with associated documents (Phase 1 and Geophysical Investigation), which were received on June 24, 2025. The documents were submitted on your behalf by Terracon Consultants Inc. These reports were reviewed in accordance with 567 IAC 133 Rules for Determining Cleanup Actions for Responsible Parties. DNR has the following comments:

- Nine soil borings and five associated temporary monitoring wells were spread across the site(s), which extend over 12 acres on both sides of the railroad tracks east of 12th St and west of Interstate 74 in Bettendorf, Iowa. DNR has reviewed the report(s) as received, but given the large size of the site, DNR comments and requirements will be limited to the areas where samples were collected, and may not reflect conditions in all areas of the property.
- Numerous analytes typically associated with petrochemicals/gasoline/diesel fuels were detected in soil boring B-1. These detections are consistent with known past site use as a filling station. Detections were not noted in soil at other locations. Detections in soil did not exceed published statewide standards.
- Petrochemicals were also detected in groundwater at location B-1. Some analytes exceeded published statewide standards. In addition, light non-aqueous phase liquid (LNAPL) was detected at a thickness of 0.04' in this temporary monitoring well.
- A geophysical study was completed in an effort to identify any remnant underground storage tanks. No tanks were found, though multiple anomalies were found. It remains unknown if these anomalies represent former UST tank pits.

The presence of LNAPL at the site represents a previously unknown hazardous condition, and requires additional investigation. The site will remain with the DNR Contaminated Sites Section, but may also rely on rules and regulations of the DNR Underground Storage Tank Section, since these rules are most applicable to petroleum contamination likely related to a former UST facility.

Additional assessment is required to assess the extent of LNAPL in the vicinity of B-1 in the northeast corner of the site; submit a plan for assessment of extent and thickness of LANPL within 90 days of receipt of this letter.

In addition to assessment, an environmental covenant (EC) will be required for eventual site closure. Despite the low likelihood that shallow groundwater might be used in the future, an EC is required to protect future site users and owners, and guide future site redevelopment needs. Your consultant has been provided guidance on development of ECs, and templates for acceptable language are available on the DNR Contaminated Sites and Solid Waste website. Please ensure that any EC draft is reviewed and approved by DNR Contaminated Sites staff prior to signing by the site owner.

If you have any questions, or if we may be of further assistance, please contact me at matthew.graesch@dnr.iowa.gov or by phone at [\(515\) 250-1923](tel:5152501923).

Sincerely,

Matthew Graesch, P.G.
Environmental Specialist Senior
Land Quality Bureau

cc: Michael Sullivan
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