

September 2, 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](#)
Site Assessment Report Workplan for Free Product Delineation**

Dear Mr. Koellner:

The Iowa Department of Natural Resources, Contaminated Sites Section (Iowa DNR), has reviewed the above referenced Site Assessment Report Workplan for Free Product Delineation, which was received on August 26, 2025. The document was submitted on your behalf by Terracon Consultants Inc. The present document was prepared in response to a DNR letter of July 15, 2025 noting that additional work on the site must be completed to define the area of free product (LNAPL) impact. DNR has the following comments:

- The plan for five additional borings is approved as written in the report. Please note that screened intervals for wells installed for LNAPL assessment must intersect the water table. An appropriately long screen may help ensure that the water table does not rise above the screen and preclude the well from inclusion in the assessment.
- Ensure that presence and/or thickness of LNAPL is gauged *before* any other activities during a site visit. Water level gauging and bailing/sample collection should be completed after activities related to LNAPL assessment.
- If LNAPL is encountered in proposed wells 2, 3, 4, or 5, it will be necessary to add step-out wells to fully delineate the area where LNAPL is present.
- The planned timeframe for reporting included in Section 8.0 is approved.
- In the absence of a full cleanup, an [environmental covenant](#) (EC) will be required for eventual site closure. This document can be completed at any time. Please work with DNR to review a draft EC prior to sending or signing any physical documents. The EC needs to include a quality map, and a [Property Interest Form](#).

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:(515)250-1923).

Sincerely,

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

cc: Michael Sullivan
Iowa DNR Land Quality
6200 Park Ave, Suite 200
Des Moines, IA 50321

Iowa DNR Field Office 6

Koadi T. Jacobs
Terracon Consultants Inc
870 40th Ave
Bettendorf, IA 52722