



September 5, 2025

Mr. Kale Horton Hazardous Waste Program Manager United States Department of Agriculture Farm Services Agency 1000 W Wall St Harrisonville MO 64701

Re: UDSA Former Adaza Grain Storage Site (IA-601) Contaminated Sites Database ID No. 2860 Site Specific Work Plan

Dear Mr. Horton,

The Iowa Department of Natural Resources, Contaminated Sites Section (Iowa DNR), has reviewed the above referenced *Site Specific Work Plan* for the the Adaza Former Grain Storage Site (IA-601) (Doc # 42844). This work plan was reviewed in accordance with 567 IAC 133 *Rules for Determining Cleanup Actions for Responsible Parties*. Please see comments below.

1. Section 1.0 indicates 'In 2020, the Iowa Department of Natural Resources (IDNR) requested that the CCC/USDA conduct groundwater sampling at several sites to confirm the presence or absence of contamination in the shallow groundwater underlying the former facilities and whether the site could be reclassified to 'No Further Action (NFA).' Please note, site closure can be achieved under the current regulatory program (567 IAC 133); however, a true No Further Action classification only applies to sites that enroll in the voluntary clean-up program known as the Iowa DNR Land Recycling Program. The grain bin sites will not be receiving a No Further Action classification or certificate at the time of closure.

Please incorporate the changes noted above into the field work planned for this site. Please include a cover letter with the site assessment acknowledging the comment. If you have any questions or need further information please feel free to contact me at <u>515-669-5494</u> or by email at <u>shelly.nellesen@dnr.iowa.gov</u>.

Sincerely,

Shelly Nellesen Environmental Specialist Senior Land Quality Bureau

c: Mike Sullivan, Iowa DNR Solid Waste and Contaminated Sites Supervisor Iowa DNR Field Office #4, Atlantic