

Chosen Valley Testing, Inc.

Geotechnical Engineering and Testing • Environmental Consulting • 1410 Seventh Street NW • Rochester, MN 55901 • Telephone (507) 281-0968

March 13, 2026

Jake Bucklin
Land Quality Bureau
Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, IA 50321

Site Assessment Report Work Plan

Jay Bros. Truck Stop
3065 220th Street
Hamilton County PID # 40892333400004
Williams, IA 50271
Contaminated Sites Database Site ID #2881

Dear Jake Bucklin:

Chosen Valley Testing, Inc. (CVT) is pleased to submit this site assessment report work plan for the above-referenced site. The work plan was prepared in response to Iowa Department of Natural Resources (IDNR) correspondence dated February 18, 2026. The IDNR correspondence required a work plan to be submitted with proposed scope to further evaluate petroleum contamination observed on the property on November 10, 2025 and November 22, 2025.

If you have questions or comments pertaining to the material presented herein, please contact CVT at either of the undersigned.

Sincerely,

Chosen Valley Testing, Inc.



Catharine McCook
Staff Environmental Consultant
507-281-0968



Mark Gretebeck
Environmental Manager
608-782-5505

A. Background

The property is an approximately 9.5-acre parcel located at 3065 220th Street in Williams, Hamilton County, IA. The property has operated as a truck stop and is currently under redevelopment.

On November 10 and November 22, 2025, CVT personnel visited the site to collect additional samples. The purpose of the site visit was to collect soil from beneath the gasoline and diesel dispensers prior to their removal, screen the soil headspace of the samples, and analyze them for petroleum contaminants. At the time of these visits, the gasoline and diesel dispenser piping had been excavated to allow for collection of soil. A hand auger was used to collect soil from between 1 and 2 feet below ground surface near each of the dispensers and along the piping at a midpoint between dispensers. Soils collected during the site visit were screened with a PID and delivered to Eurofins Scientific for laboratory analysis.

A total of eight soil samples were collected from beneath the gasoline dispensers and piping. The highest PID reading was 3,035 ppm collected from beneath a gasoline dispenser, and each of the samples collected from beneath the gasoline dispensers and piping returned PID readings above 1,000 ppm.

A total of twenty-two soil samples were collected from beneath the diesel dispensers and piping. Most samples from this dispenser island returned PID readings between 100 and 500 ppm, except for three samples from near the center of the island that were below 100 ppm and one sample from near the northeast corner of the island which was above 500 ppm. During the site visits, the trenches along the diesel piping were saturated with water; while the field screenings appear indicative of a diesel release, the presence of water may have caused contamination to spread and so it is unclear which dispensers caused the most significant leaks. The highest concentrations of petroleum contaminants were 9,550 mg/kg gasoline from the gasoline dispensers (sample G-3) and 20,800 mg/kg diesel from the diesel dispensers (sample D-15).

B. Site Assessment

CVT is fully committed to maintaining the safety of all employees. In support of this commitment and consistent with our safety culture, CVT will develop a site-specific health and safety plan for personnel conducting field services. Prior to beginning on-site activities, CVT will hold a meeting to review the health and safety requirements specific to this project.

At this time, fieldwork is expected to be conducted under Environmental Protection Agency (EPA) Level D personal protective equipment (PPE), which includes hard hats, hearing protection, safety glasses, protective gloves, and steel-toed boots. If petroleum or chemical constituents are encountered in soil or groundwater during drilling or sampling activities that present a higher risk of personal exposure, the level of protection may be upgraded as necessary. The site-specific health and safety plan will be prepared prior to implementation of the field activities described in the work plan and will be followed by all CVT personnel and subcontractors.

This work plan outlines the proposed scope of work for conducting additional investigation within the site boundaries based on currently available information. Off-site investigation is not included currently. However, CVT recognizes that the results of this investigation may indicate the need for additional off-site evaluation, including in the down-gradient direction, which is not currently included in this work plan.

C. Scope of Work

This Site assessment work plan was developed to investigate the maximums identified during the line and pump islands sampling. The objective of the site assessment plan is to study a contamination situation to determine the types, amounts, and sources of contaminants present, hydrogeological characteristics of the site, and the vertical and horizontal extent of contamination, with a goal of developing an adequate remedial action plan. CVT is proposing the following scope of work for the site assessment of the above referenced property. This initial scope may not define the previously identified impact.

- Ten geoprobe soil borings (GB-01 through G-05 and D-06 through D-10), to a depth of 20 feet below ground surface (bgs) or until first groundwater, whichever is shallower, to assess soil and groundwater conditions beneath the site for detectable petroleum contaminants. Soil borings should be installed near the center and around the two dispenser islands on the property.

The borings will be advanced using a geoprobe push-probe drill rig to facilitate the collection of soil and groundwater beneath the site. Geoprobe tubes will be advanced from the ground surface to the terminus of the boring to collect soil samples. An onsite geologist will examine the soil samples for visual and olfactory signs of contamination and generate a boring log of the encountered soils. Samples from each interval will be screened onsite using a photoionization detector (PID) and a sample for laboratory analysis will be collected from the interval exhibiting the highest PID reading, or from the deepest interval if no PID readings are above detectable levels. The soil samples will be analyzed for OA1 petroleum compounds and OA2 petroleum compounds. A total of nine (9) soil samples will be collected for laboratory analysis, two of which will have an additional analysis of RCRA metals.

Upon completion of each boring, a slotted PVC screen will be inserted into the boring to create a temporary well. The groundwater elevation from each well will be collected and a groundwater surface elevation will be developed from the data. A grab sample of the groundwater within the boring will be collected using a peristaltic pump. The groundwater samples will be analyzed for RCRA metals, OA1, and OA2. Up to four (4) groundwater samples will be collected for laboratory analysis, taken from the two borings center of the dispenser islands and in downgradient borings if groundwater recharge is sufficient. The approximate depth to groundwater beneath the property has not been identified at the time of this proposal. If groundwater is not encountered during drilling, groundwater samples will not be taken.

An ex-situ slug test will be performed on the three monitoring wells that are not located within fill areas.

An instantaneous volume of water will be removed from each monitoring well. A data logger will be used to measure the recovery of the monitoring well. The data will be collected until 80% of the initial water table level has recovered. The Bower and Rice method will be used to calculate a hydraulic conductivity for each monitoring well.

Upon completion of the borings, CVT will backfill the holes with bentonite chips.

D. Data Evaluation

Collected data will be evaluated and compiled to characterize current environmental conditions within the subsurface soil and groundwater at the property. Soil and groundwater analytical results will be summarized in tables and compared to the applicable standards outlined in the Iowa Administrative Code (IAC) Chapter 137 Soil and Water Standards (SWS) and/or the U.S. Environmental Protection Agency (EPA) Maximum Contaminant Levels (MCLs). This evaluation will consider site-specific hydrogeologic conditions and potential receptors. Plume maps illustrating reported and interpreted concentrations of individual chemicals of concern (COCs) exceeding the SWS and/or MCLs will be developed and included in the Site Assessment Report (SAR).

The IDNR has established SWS under IAC Chapter 133, which will be used as action levels for comparison with soil and groundwater analytical results. For site evaluation and monitoring purposes, CVT will compare analytical results to SWS criteria for both protected groundwater sources (PGWS) and non-protected groundwater sources (NPGWS).

In addition, Tier 1 Action Levels established under IAC Chapter 135 may be applied in the evaluation of applicable COCs, depending on the concentrations detected and the presence of identified exposure pathways or receptors.

E. Receptor Survey

CVT will use the receptor distances from IAC Chapter 135 to gather information about potential receptors for the Site. CVT will use the Tier 1 and Chapter 133 action levels to develop further assessment and remedial actions.

F. Reporting

Following completion of field activities and receipt of laboratory analytical results, a SAR will be prepared to summarize and present the data collected during the investigation. The SAR will include the following information and will be submitted to the Iowa Department of Natural Resources (IDNR) for review:

- Description and documentation of field activities and methodologies
- A scaled site map showing investigative sampling locations and other relevant details
- Tables summarizing analytical results, including free product observations, if applicable
- Plume maps illustrating concentrations of elevated COCs in soil and groundwater
- Soil boring logs and laboratory analytical reports
- Discussion of potential receptors and exposure pathways
- Conclusions and recommendations

Please note that CVT recognizes that the findings of the SAR may indicate that additional site assessment or delineation activities, not currently included in this work plan, could be necessary (e.g., off-site investigation or additional downgradient delineation). If further investigation appears warranted, CVT will notify the IDNR at that time.

G. Schedule

The following is a tentative schedule for implementing this work plan assuming IDNR approval before March 16, 2026:

- Complete SAR field activities – Mar 23 or Mar 30, 2026
- Submit SAR – May 2026

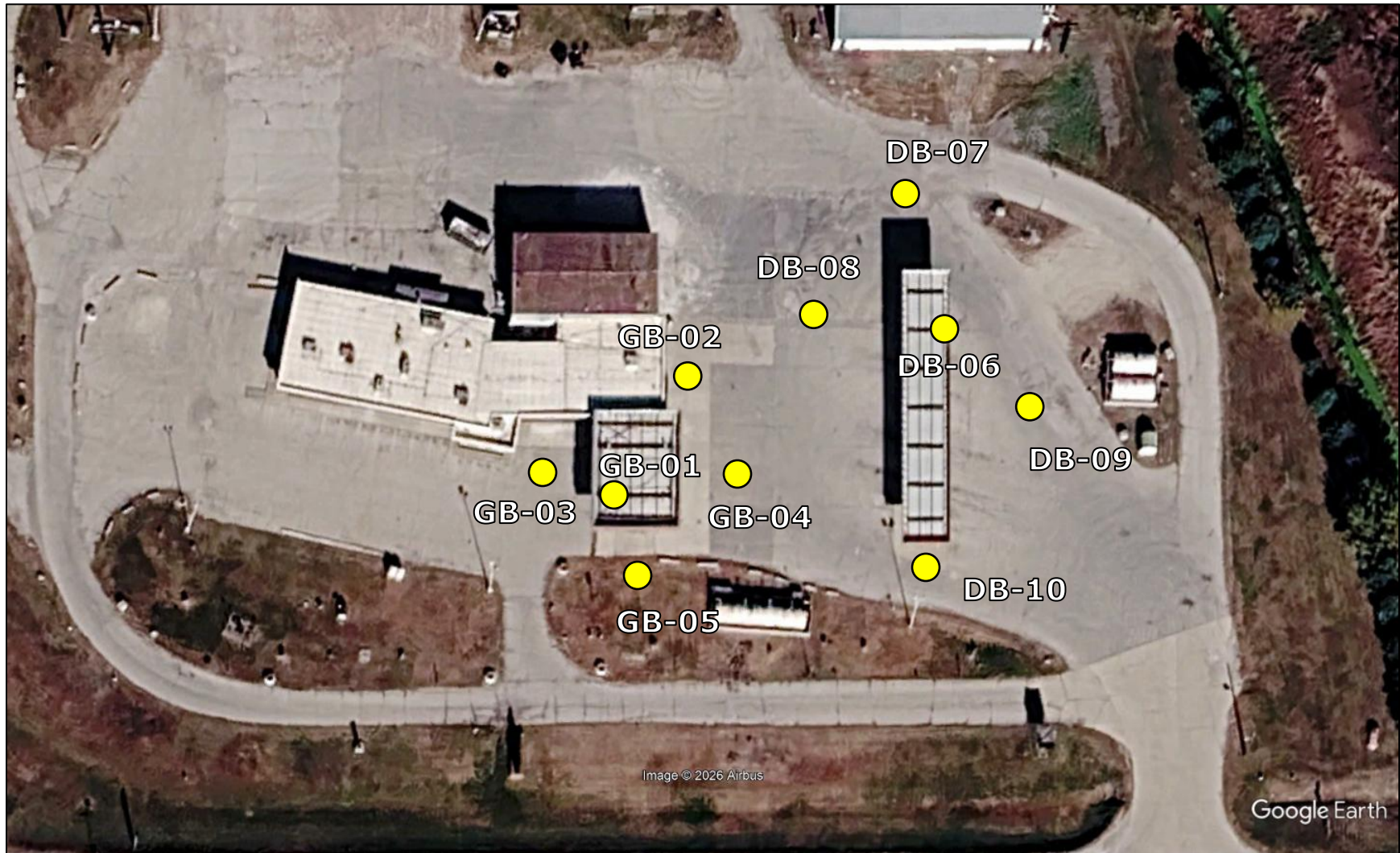
Please note that this schedule is tentative and may be influenced by several factors, including the availability of drilling equipment and personnel, laboratory turnaround times, and weather conditions. The timeline will also depend on the timing of IDNR approval of this work plan and whether additional delineation is required based on the results of the proposed investigation. CVT will provide updates to the IDNR and the client as needed throughout the project, including any revisions to the schedule.

Attachments:

- Proposed boring locations
- IDNR letter – Feb 18, 2026

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Proposed Boring Locations for site assessment of former Jay Bros. Truck Stop

Williams, IA

February 18, 2026

MR MICHAEL PUREWAL
WILLIAMS LLC
PO BOX 3130
KENT WA 98089
PUREWAL.MICHAEL@GMAIL.COM

**Re: Jay Bros Truck Stop (3065 220th Street, Williams, Iowa 50271)
Contaminated Sites Database Site ID No. 2881
Pre-Excavation Dispenser Soil Sampling Report**

Dear Mr. Purewal:

The Iowa Department of Natural Resources, Solid Waste and Contaminated Sites Section (DNR) has reviewed the January 14, 2026 Pre-Excavation Dispenser Soil Sampling Report ([Doc #43269](#)) for the Jay Bros Truck Stop Site located near Williams, Iowa. The report summarized soil samples collected from the areas around/beneath the gasoline and diesel dispensers at the site prior to their removal.

To investigate the potential for contamination around the dispensers and piping, a total of seven soil samples were collected in October 2025 and an additional 30 soil samples were subsequently collected in November 2025 after piping had been removed and the consultant could get better access to the soil. The samples were all analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX) via EPA Method 8260 and total extractable hydrocarbons (TEH) via Iowa Method OA-2. Analytical results indicate that BTEX as well as TEH as gasoline, diesel, and waste oil are all present in soils collected at the site suggesting that contamination may be present in soil and groundwater.

Please note that if any soil excavation is planned or has occurred, DNR requires confirmation sampling in accordance with [567 IAC 135 - Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks](#): "At a minimum, one soil sample must be taken for field screening every 100 square feet of the base and each sidewall. Soil samples must be taken for laboratory analysis at least every 400 square feet of the base and each sidewall of the excavated area to confirm that remaining concentrations are below Tier 1 levels. If the base or a sidewall of the excavation is less than 400 square feet, a minimum of one sample must be analyzed for each sidewall and the base."

Based on the information presented by the report, DNR has determined the presence of a potentially hazardous condition (as defined in Iowa Administrative Code (IAC) [567 IAC 131 - Notification of Hazardous Conditions](#)) at the site. As such, **additional assessment is required** under [567 IAC 133 - Rules for Determining Cleanup Actions and Responsible Parties](#). Pursuant to [567 IAC 133.4\(3\)"a"](#) the owners of the site must perform an environmental site assessment using a DNR-approved site assessment plan created in accordance with [567 IAC 133.2](#).

The Site Assessment Plan will be due by **March 31, 2026**. If you have any questions or if we may be of further assistance, please contact me at [\(515\) 415-0889](tel:515-415-0889) or jake.bucklin@dnr.iowa.gov.

Sincerely,

Jake Bucklin
Environmental Specialist
Land Quality Bureau

cc: Catharine McCook
Chosen Valley Testing, Inc
1410 7th Street NW
Rochester, MN 55901
cmccook@chosenvalleystesting.com

Michael Sullivan
Iowa DNR
6200 Park Avenue, Suite 200
Des Moines, IA 50321
michael.sullivan@dnr.iowa.gov

Iowa DNR Field Office #2, Mason City
trent.lambert@dnr.iowa.gov