



STATE OF IOWA

THOMAS J. VILSACK, GOVERNOR  
SALLY J. PEDERSON, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES  
JEFFREY R. VONK, DIRECTOR

September 24, 2003

Warren Mueller, Supervisor  
Property Remediation & Emergency Response  
Ameren Services  
P.O. Box 66149  
St. Louis, Missouri 63166-6149

William Barber, Environmental Manager  
Group Environmental Management Company  
4850 East 49<sup>th</sup> Street, MBC3-147  
Cuyahoga Heights, Ohio 44125-1014

Re: MWH Response Letter dated September 8, 2003  
Former Manufactured Gas Plant Site, Keokuk, Iowa

Dear Mr. Mueller and Mr. Barber:

The Iowa Department of Natural Resources, Contaminated Sites Section, (Department) has completed the review of the above referenced letter submitted by Montgomery Watson Harza (MWH). The Department agrees with the majority of the clarifications offered in the letter but adds information to the following.

**Remedial Investigation Report – Volume I Technical Report**

Page 96, 7.1.3, Other Site Contaminants:

The Department uses United States Environmental Protection Agency (EPA) procedures for collecting groundwater samples from monitoring wells and they prefer to collect non-filtered samples for metals. Therefore, the Department agrees with your proposal to use techniques that are designed to minimize the collection of solids in the groundwater sample if the technique is other than filtering. If you feel filtering is the only way to get an accurate lead sample then submit a justification for the Department's review. Another option is to collect filtered and non-filtered samples.

**Iowa Land Recycling Program Determination (Iowa Administrative Code 567-137)**

The Department has reviewed the status of the petroleum leaking underground storage tank site and agrees that the site is not 'subject' to the authority of the Underground Storage Tank Section of the Iowa Department of Natural Resources. The authority has been transferred to the Contaminated Sites Section and therefore the entire site is eligible for enrollment into the Iowa Land Recycling Program (LRP). If you choose to enroll into the LRP you would be required to follow all the appropriate steps as outlined in IAC-567-137 including the Enrollment Application, Participation Agreement, Site

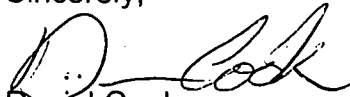
Assessment, Risk Evaluation, and the Response Action. Data previously collected in the remedial investigation along with the proposed additional assessments may satisfy the requirements of the LRP Site Assessment.

The format for the LRP's Risk Evaluation is similar to the EPA's format used for the current risk assessment. The planned Interim soil removal will help make the risk evaluation simpler.

The biggest difference between the LRP and the current consent order is in the LRP's Response Action and the EPA's Feasibility Study. In the feasibility study you were required to submit several alternative remedies and then the most appropriate remedy was chosen. With the LRP, using data from the site assessment and the risk evaluation, you may propose one or more remedies that utilize any combination of the following; source removal, treatment, technological controls, and/or institutional controls. Your proposed remedy would go through Department review, a public comment period, and then become final.

Once again the Department agrees with the majority of your responses and will give priority treatment to submitted documents whether you choose to stay with the current consent order or enroll in the LRP. If you have any questions or need further information please feel free to call or e-mail at (515) 281-4171 or [dan.cook@dnr.state.ia.us](mailto:dan.cook@dnr.state.ia.us).

Sincerely,



Daniel Cook  
Environmental Specialist Senior  
Contaminated Sites Section

c: Randy Kroneman, Montgomery Watson Harza, 11153 Aurora Avenue, Des Moines, Iowa 50322

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