

November 12, 1999

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Mr. John Vedder  
Iowa Department of Natural Resources  
Contaminated Sites Section  
900 E. Grand Street  
Des Moines, Iowa

DEPT. OF  
NATURAL RESOURCES

**Subject: Request for Confirmation**  
**McCleery - Cumming Company, Inc.**  
**915 E. Tyler Street**  
**Washington, Iowa**  
**LAW Project No. 60260-9-1600 Phase 4 Task 5**

Dear Mr. Vedder

Law Engineering and Environmental Services, Inc. (LAW) performed Environmental Site Assessments (ESAs) at the McCleery - Cumming Company, Inc. facility located at 915 E. Tyler Street in Washington, Iowa. Three areas of potential concern were identified during the Phase I ESA including an abandoned heating oil underground storage tank (UST), light industrial (printing) use, and the use and storage of potentially hazardous chemicals, materials and/or waste. Other areas of concern identified by LAW during the Phase I ESA included stained floor drains, a former hydraulic baler, former chemical storage in the boiler rooms, and the reported prior presence of free product, chloroform, and cis-1,2-dichloroethene in groundwater. Based on LAW conducted a limited Phase II ESA (attached), and identified the presence of petroleum hydrocarbons that may be related to a former unregulated UST, and the heavy metals arsenic, barium, chromium and lead that may be related to chemical use and storage on-site.

A 6,000 gallon heating oil UST was abandoned in place around 1994 by filling the UST with a concrete slurry; however, according to the UST regulations (Environmental Protection [567] Chapter 135.2 (455B) Definitions), it is LAW's understanding that heating oil USTs are unregulated. Although the UST may be unregulated, based on a conversation with Mr. Cal Limbergh and Jim Humeston from the Iowa Department of Natural Resources (IDNR), and based on Environmental Protection [567] Chapter 135, it is LAW's understanding that petroleum contamination resulting from the unregulated UST would be reportable to IDNR. Furthermore, any corrective actions would be based on Action Levels established under the Iowa Underground Storage Tank (UST) Regulations (Environmental Protection [567] Chapter 135). Based on LAW's interpretation of these regulations and the associated appendices, the petroleum constituents identified at the

subject site do not appear to exceed the Action Levels established by the State of Iowa and as such no further action appears necessary.

- **LAW requests confirmation from IDNR that no further action is necessary pertaining to potential impacts identified at the site in the vicinity of the heating oil UST.**

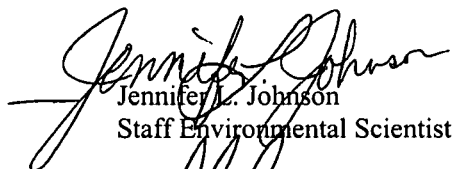
Non UST-related contaminants (i.e. metals) were identified in soil and/or groundwater at other locations onsite (i.e. vicinity of the waste storage shed, former chemical storage area, under the floor in the Pre-Press Room, and the groundwater sump). The groundwater sump discharges into a four cubic yard bed of gravel and enters the ground surface (as opposed to the sanitary sewer system). With the potential exception of lead in soil underlying the Pre-Press Room, it is LAW's opinion that the detected concentrations of heavy metals in soil are indicative of background ranges.

- **LAW requests confirmations from the IDNR that no further action is necessary pertaining to the detected concentrations of heavy metal in soil.**
- **With respect to potential contaminants identified in groundwater (barium and lead) in the vicinity of the chemical storage shed and the groundwater sump, LAW requests confirmation that the detected levels are indicative of background concentrations, and that no additional site assessment is required.**

In order to bring closure to these outstanding issues, LAW respectfully requests your written confirmation opinion to the questions presented herein. If you have any questions please call the undersigned at (606) 581-6031. Thank you for your assistance.

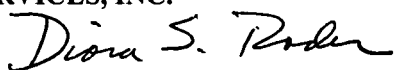
Sincerely,

**LAW ENGINEERING AND ENVIRONMENTAL SERVICES, INC.**

  
Jennifer L. Johnson  
Staff Environmental Scientist

  
Jeff Marie  
Senior Geologist

Attachment: Phase II ESA

  
**SIGNED WITH PERMISSION**  
Diana S. Rader  
Principal Geologist  
Assistant Vice President

CC: McCleery-Cumming, Co., Mr. William Blackburn  
Bemrose Corporation, Plc – c/o Ms. Bridget Hust, Faegre & Benson  
Norwood Promotional Products – c/o Mr. R. Steven Morton, Jenkins & Gilchrist

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