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DEPARTMENT OF NATURAL RESOURCES
JEFFREY R. VONK, DIRECTOR

April 27, 2006

Donald Duncan, Corporate Counsel
Alamo Group, Inc.
1502 E. Walnut
Sequin, TX 78155

Subject: Final Groundwater Investigation and Risk Assessment Report -
LRP- Herschel Site, Indianola

Dear Mr. Duncan:

Thank you for the submittal on the above-referenced site. The department has reviewed the report and would like to make a few comments on the report.

Exposure Point Concentration

- (a) *Groundwater*: According to the report, arithmetic mean was used in the determination of the exposure point concentration (EPC). The DNR guidance also recommends the use of arithmetic mean. However, the procedure adopted for choosing the monitoring wells and sampling events in the determination of the arithmetic mean for each contaminant of potential concern (COPC) was not described in the report. Current department guidance for the determination of EPC recommends the computation of the mean based on up-to-eight most recent samples from the most contaminated monitoring well, if contaminant level is stable or declining. If contaminant level is not stable or declining, and is assured of remaining so in the future, a prediction of future concentration must be made in accordance with subrule 567 IAC 137.9(4) which involves the use of numerical predictive models. Please clarify how you determined the EPC values in the groundwater medium.
- (b) *Soil*: The department recommends that soil samples be area-weighted for averaging purposes and the maximum area over which soil sample results may be averaged is $\frac{1}{4}$ acre for a site resident or future site resident or 1 acre for a site worker. Please determine if your soil sampling for the various targets (receptors) in the investigation conform to this guidance.

Determination of Cumulative Risk

Cumulative risk for each potentially exposed individual should be a sum of the risk for the individual for all the different mediums in which that individual is exposed to COPCs. This should be done for cancer risk and non-cancer risk. Thus, portions of the section on Risk Characterization and Table 6 should be changed to include cumulative risk values as described above. The Cumulative Risk Calculator guidelines by the

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department are available on the web at
<http://www.iowadnr.com/land/consites/riskcalc.html>.

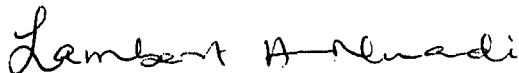
Additional Steps in the LRP Process

- (a) *Final Document*: The information presented thus far indicates the site will require institutional or technological control(s). After approval by the department of the site report and risk characterization to demonstrate compliance, the next step in the LRP process is preparation of the final report, which should include institutional control. In 2005 the legislature passed the "Uniform Environmental Covenants Act" which took effect on July 1, 2005. The department has drafted an interim model environmental covenant for use in the LRP. Pending adoption of the rules, the "Interim LRP Covenant" and supporting forms and guidance may be used. This document may be viewed on the web at <http://www.iowadnr.com/land/ust/envirocovntindex.html>. Please contact Dave Wornson for any legal questions on the uniform covenant.
- (b) *Public Notification*: The department shall prepare a public notice prior to approval of a no further action classification. The public notice will describe the results of the risk assessment conducted at the Herschel, Indianola (Alamo Group – Iowa Facility) site and the proposed institutional control as described in the "interim LRP covenant."

The DNR Records section is converting from paper file system to web applications where electronic files may be accessed from the Internet. The link to Contaminated Sites Section is: <http://programs.iowadnr.com/contaminatedsites/pages/search.aspx>
For all future documents, please submit one paper copy and one electronic copy as a searchable PDF or as a word processing document. The electronic copy may be sent by email to lambert.nnadi@dnr.state.ia.us.

If you have any question or comments, please contact me at 515-281-4117 or email at lambert.nnadi@dnr.state.ia.us.

Sincerely,



Lambert A. Nnadi
Environmental Specialist Sr., Contaminated Sites Section

cc: Bill Stuckert, General Manager, Alamo Group- Iowa
David Wonder, Shaw Environmental, Inc., Indianola
Cal Lundberg, Supervisor, Contaminated Sites Section