



Jolly, Becky <becky.jolly@dnr.iowa.gov>

Re: Besser Quinn 2023 first half semi annual monitoring report

1 message

Rath, Brian <brian.rath@dnr.iowa.gov>

Mon, Jan 22, 2024 at 11:03 AM

To: Donn Stone <stoneconsultinginc@gmail.com>

Cc: "Stobbe, Chad" <chad.stobbe@dnr.iowa.gov>, Donn Stone <dstone@stoneenviro.com>, Becky Jolly <becky.jolly@dnr.iowa.gov>

Don,

As the engineer who will be reviewing the report you are preparing, I want to make sure we are on the same page. As noted in Chad's original email, we requested a meeting to discuss our comments. Without a meeting and further discussion to date, we are concerned that your responses and/or the report may not meet what we requested, which would continue to hinder a proper evaluation of the site. Further, if our concerns are not addressed, the facility may unnecessarily perform monitoring and analysis that limits moving the facility in a direction where we could consider reducing or terminating monitoring.

Based on the limited information that is currently available, additional monitoring and analysis beyond what is currently being conducted could be required. In similar circumstances, we have seen this trigger corrective action or remediation. However, as noted in our comments, we are concerned that the elevated test results may not be indicative of actual groundwater conditions at the site. If actual groundwater test results were found to be sufficiently lower than current data, additional monitoring and analysis along with corrective action or remediation may not be necessary and we could consider moving the facility towards terminating monitoring.

So in closing, we continue to recommend a meeting with you and your client before completing the report and submitting it to us for review.

Thanks,
Brian

Brian Rath, P.E.**Environmental Engineer Senior**

Solid Waste and Contaminated Sites Section

Iowa Department of Natural Resources

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On Fri, Jan 19, 2024 at 8:45 AM Donn Stone <stoneconsultinginc@gmail.com> wrote:

Chad:

I am hoping to complete the semi-annual report next week. With the submittal of the report, I plan to provide a response to the questions presented earlier.

One thing that I have thinking about is that the foundry sand deposited at the site was tested yearly for TCLP metals, but not for several of the metals that are noted as high with respect to the groundwater standards. We anticipate

testing the deposited sand for those metals to determine if the sand is the source of the metals such as manganese and molybdenum, or if they are naturally occurring in the glacial soils that underly the site.

Donn

Donn Stone, P.E.

President

Senior Environmental Engineer



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dstone@stoneenviro.com, www.stoneenviro.com

From: Stobbe, Chad <chad.stobbe@dnr.iowa.gov>

Sent: Friday, January 19, 2024 6:38 AM

To: Donn Stone <dstone@stoneenviro.com>

Cc: Brian Rath <brian.rath@dnr.iowa.gov>

Subject: Re: Besser Quinn 2023 first half semi annual monitoring report

Melissa and Donn -

I just wanted to touch base regarding this prior correspondence. To-date, the DNR has not received any reply. We're quickly approaching the March 1st due date for the next AWQR and we want to ensure these issues are addressed/incorporated within the next submission. At your convenience. Thanks

Chad A. Stobbe

Environmental Specialist Senior

Solid Waste and Contaminated Sites Section

Department of Natural Resources

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On Wed, Dec 6, 2023 at 11:01 AM <dstone@stoneenviro.com> wrote:

Donn is out doing Environmental Site Assessments today in SE Iowa. I will make sure he looks at this when he gets back later today or tomorrow.

Thanks,

Melissa

From: Stobbe, Chad <chad.stobbe@dnr.iowa.gov>
Sent: Wednesday, December 6, 2023 10:53 AM
To: Donn Stone <stoneconsultinginc@gmail.com>
Cc: Brian Rath <brian.rath@dnr.iowa.gov>; Jolly, Becky <becky.jolly@dnr.iowa.gov>
Subject: Re: Besser Quinn 2023 first half semi annual monitoring report

Donn -

The DNR has completed its review of the Spring 2023 Semi-Annual Groundwater Sampling Report ([Doc #107384](#), received 7-26-23) and has identified multiple items that require further clarification/action. Rather than draft a formal comment letter, I thought an email outlining the issues and then setting up a meeting with you to discuss them in more detail would be the best course of action.

Points of clarification:

- Matt Graesch has taken a different position within the DNR, so Brian Rath, Senior Environmental Engineer, will be reviewing these water quality reports moving forward.
- While semi-annual groundwater sampling is required, Special Condition 9(h) of the executed Beneficial Use Determination ([Doc #95772](#)) does not require semi-annual reporting. I've included the wording for your reference below:

"The End-User shall submit an Annual Water Quality Report (AWQR) to the DNR, certified by a qualified groundwater scientist, detailing the status of the Groundwater Monitoring Program for the reclamation project (e.g., sampling locations and results, assessments), summarizing key actions completed, describing any problems encountered, discussing actions to resolve the problems (e.g., results of corrective action remedies to address SSLs), if any, and key project activities for the upcoming year. This report shall include a site map that delineates all monitoring points where water quality samples were taken, and plume(s) of contamination, if any. The report shall contain a narrative explaining and interpreting all of the data collected during the previous year, and shall be submitted to the DNR by March 1st each year."

Although semi-annual reporting is not required, the DNR is providing our review comments regarding the Spring 2023 Semi-Annual Groundwater Sampling Report to provide clarification on the expectations for future sampling and reporting.

- 1) Special Condition 9(e) of the executed BUD states, *"Groundwater samples shall be field analyzed for temperature, specific conductance, and pH whenever a sample is withdrawn from a monitoring well. Furthermore, groundwater samples shall not be field-filtered prior to analysis by a laboratory certified by the DNR."* However, Page 14 (March 2023 lab report) of the submittal states, *"Samples were filtered in the field prior to preservation for metals analysis."* Please discontinue field filtering of all samples as this does not allow for proper analysis of the site's groundwater condition. If the field sampling did not occur and the note was an error, please provide written clarification of what occurred.
- 2) MW QW was noted as dry (since December 2022) on pages 5 and 7 of the submitted report. Please continue to discuss this in future reports, including whether or not this well should be replaced to obtain an adequate sample.
- 3) Page 5 of the report submittal states in part, *"Groundwater samples are typically obtained on two semi-annual occasions with the most recent event taking place on June 19, 2023."* While this report references June 2023 samples within the narrative and in the associated Tables, the referenced lab report is from the March 2023 sampling event. Please provide the June 2023 lab report.
- 4) With regard to Table 2 on page 6 of the report submission, only six parameters are noted when sampling for all Appendix D parameters was completed in March 2023. Further, there should be the March 2023 and June 2023 data for all Appendix D parameters in this and other report tables. Please revise and resubmit Table 2 and other applicable tables.
- 5) Pages 7-8 of the report submittal state in part, *"Table 3 notes manganese concentrations exceeded the State of Iowa non-protected groundwater standard in MW QS and QNW. Cobalt concentrations exceeded the standard in MWs QNW, QS, and Q. Nickel exceeded the standard in MW QS."* Table 3 states that the results are for March 2023, but the analytics are only from the June 2023 sampling. Please update the Table 3 title accordingly. Also, only the Cobalt exceedance of the non-protected groundwater standard was noted in monitoring well QS. Please reconcile and revise the narrative statement above with the results in Table 3.
- 6) As was noted above, the Table 4 title indicates the results are from March 2023. However, the results are only from the June 2023 sampling. Please update Table 4 to include both sampling events and ensure all report tables and date references regarding sampling events are accurate.
- 7) Page 8 of the report submittal states in part, *"Table 4 notes that the listed metals; manganese and molybdenum, were detected at concentrations that exceeds the State of Iowa protected groundwater standard. The exceedances are highlighted in yellow. The June 2023 sampling noted all of the six monitoring wells exceeded the manganese standard. One MW exceeded the molybdenum standard, QN."* Per the 2023 results, Cobalt was also detected at concentrations that exceeded the protected GW standard in 5 monitoring wells. Further, since MW-QW was dry, there are only 5 monitoring points that could have had exceedances. Please reconcile and resubmit Table 4 and the narrative statement above.
- 8) Page 44 of the report submission states in part, *"For the most current data, there are no site prediction limit exceedances. Using intrawell comparisons with insufficient background, there are no control limit exceedances."* These conclusions appear to be based upon an incomplete number of parameters being analyzed - s versus all Appendix D parameters. Also, as noted above, statistics are only required as part of the Annual Water Quality Report submission. Please ensure the upcoming March 1st AWQR submission includes discussion on the findings of the required statistical analysis. As noted in the Beneficial Use Determination, statistics should commence when 4 data points are available, and the DNR requests this be expanded up to 8 as those become available.
- 9) Total Suspended Solid (TSS) results in the attached March 2023 sampling exceeds our unofficial trigger for concern of 100 mg/L. As such, this very likely impacts the total metals lab results. However, this conflicts with the field filtering notation that was discussed above. Please provide a detailed discussion of your sampling procedures.

In addition, please provide a discussion comparing TSS values to metals and make recommendations for changing sampling procedures as necessary to reduce TSS during future sampling events.

10) Field forms do not provide sufficient detail regarding your field procedures. Please start using the forms on our [website](#) or ensure sufficient information is included on your forms for future sampling events.

We anticipate and appreciate your cooperation in addressing these issues. As noted above, we request a meeting to discuss the above items. We'd like to hold this meeting yet in December if possible. Please contact me to schedule. Meanwhile, feel free to contact me if you have any questions. Thanks

Chad A. Stobbe
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On Wed, Jul 26, 2023 at 10:40 AM Donn Stone <stoneconsultinginc@gmail.com> wrote:

Chad:

Attached is the semi-annual report for the Besser Quinn site.

Regards.

Donn

Donn Stone, P.E.

President

Senior Environmental Engineer



[1631 NW 30th Court, Ankeny, IA 50023](#)

Cell 515-689-7701

1/22/24, 12:21 PM

State of Iowa Mail - Re: Besser Quinn 2023 first half semi annual monitoring report

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