

June 12, 2025

SCOTT MOORMAN
OPERATIONS MANAGER
BESSER QUINN MACHINE & FOUNDRY
1518 12TH STREET
BOONE IA 50036
smoorman@besser.com

Re: Besser Quinn Machine & Foundry – Boone Pit
DNR ID #08-BUD-08-99
June 4, 2025 Responses to DNR Water Quality Reporting Deficiencies Letter

Dear Mr. Moorman:

The Iowa Department of Natural Resources (DNR) has completed its review of your responses to our comments on deficiencies that we noted in recent water quality reports. These responses ([Doc #113201](#)) were hand delivered to DNR during our June 4, 2025 meeting. We continued the numbering system utilized in our initial April 18, 2025 letter ([Doc #112885](#)). Specifically, we are commenting on pages 15 through 18 of the PDF linked above, and for ease of reference, we are using the same numbering system from the submittal.

A. Revised First Semi-Annual 2023 Groundwater Sampling Report (dated July 2023)

- 1) Although inclusion of data and statistics for all parameters will be done going forward, as noted at our meeting, a discussion of exceedances and statistics, along with recommendations, must also be included in the Annual Water Quality Report (AWQR), starting with the 2024 report.
- 2) It is understood that the sand sampling would be used to request a reduction in sampling parameters. However, as discussed at our meeting, it is recommended to defer sampling and testing of the sand until a sufficient quantity of quality groundwater samples are obtained, analyzed, and reported.
- 3) Without proper documentation of the sampling process, the DNR cannot determine if quality samples are being obtained. A [link to the forms](#) was provided in the meeting notes ([Doc #113239](#)). Please use these forms starting with the 2024 AWQR.
- 4) As discussed at our meeting, it appears that semi-annual/sampling event reports were being submitted. However, a complete AWQR had not been submitted for 2023. Considering the time that has passed and that the 2024 AWQR is in process, the DNR agreed to not require submittal of the 2023 AWQR. Further, it was acknowledged that going forward, only an AWQR shall be submitted, and it shall be submitted by March 1st of each year, starting with the 2025 AWQR.

- 5) The DNR acknowledges that quality issues will be resolved in future reports, starting with the 2024 AWQR.
- 6) As discussed at the meeting, obtaining quality groundwater samples is the foundation for the analysis, reporting, and future decision-making. **Suggestions on sampling methods and procedures to improve sample quality were discussed at our meeting and have been included in the meeting notes.**
- 7) No response was provided regarding the validity of monitoring well QN due to the chloride detection. Please provide a response in the 2024 AWQR.
- 8) The DNR acknowledges that a site map will be provided in future reports starting with the 2024 AWQR.

B. First Semi-Annual 2024 Groundwater Sampling Report (dated August 2024)

- 1) See A.4. response above.
- 2) We acknowledge the potential causes of the high TSS. Suggestions on sampling methods and procedures to improve sample quality were discussed at our meeting and included in the meeting notes. Please provide the requested detailed sampling procedure(s) with a focus on obtaining quality samples as an attachment to the 2024 AWQR.
- 3) No response was provided regarding the background data quality. Once a sufficient number of quality samples (minimum of 2) have been obtained and analyzed, please compare them to the current background data set. If it is determined that prior data is not of sufficient quality to be used as the background data set, a new background data set will need to be developed to perform statistics. To expedite this data gathering, quarterly sampling shall be conducted. Please include a schedule for these steps in the 2024 AWQR.
- 4) No response was provided, but the DNR assumes that a site map will be provided in future reports, as noted in A.8. response above.

C. December 2024 Groundwater Sampling Summary

- 1) As discussed at our meeting, we want to ensure that the 2024 AWQR contains the information needed for the DNR to review. Therefore, we requested that you hold off completing the 2024 AWQR until we respond to this submittal. **Please submit the complete 2024 AWQR to the DNR on or before July 31, 2024.**
- 2) No response was provided. However, it was acknowledged in our meeting that going forward, only an AWQR shall be submitted, and it shall be submitted by March 1st of each year, starting with the 2025 AWQR.

D. Additional Comments

- 1) No response was provided regarding the requested receptor survey. Please include this survey in the 2024 AWQR.
- 2) Although the DNR believes progress on these items was made at our meeting, if future AQWR submissions fail to include the required sampling, lab analysis, statistical evaluation, and reporting

conducted on all parameters, it will be determined to be materially deficient, returned to the permit holder, and may result in escalated enforcement by the DNR.

We anticipate and appreciate your continued cooperation in resolving these issues. If you have any questions, please contact me at [\(515\) 537-4051](tel:5155374051) or Chad Stobbe at [\(515\) 201-8272](tel:5152018272).

Sincerely,

Brian L. Rath, P.E.
Environmental Engineer Senior
Land Quality Bureau

cc: Scott Kennedy, VP of Pipe and Precast, Besser Quinn
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