

March 19, 2026

BLACKHAWK ENVIRONMENTAL TESTING
OLLIE THURMAN
113 CASTLE LANE, PO BOX 85
DENVER, IA 50622

(EMAIL ONLY: olliethurman@msn.com)

SUBJECT: Single Use PCS Land Application Inspection –
Rhonda Schnitzler Facility – Winneshiek County
Permit No. 09-SDP-09-07P-PCS

Dear Mr. Thurman,

Enclosed you will find a report prepared in reference to an inspection conducted of the single use land application project listed above in Winneshiek County. We believe you will find the report self-explanatory and encourage you to take action on the recommendation listed at the end of this report.

If you have any questions about the inspection or report, please contact Mr. Kehrlie or this office at 563-927-2640.

Sincerely,

Environmental Specialist Senior, Field Office #1

Enclosure(s):

C: IDNR Solid Waste, Des Moines
Efile: 96 SW Decorah Rhonda Schnitzler PCS Land App 031726 ins cek

IOWA DEPARTMENT OF NATURAL RESOURCES SINGLE USE LANDFARM (PCS) PERMIT INSPECTION FORM

Permit No.: 09 -SDP- 09 - 07 P-PCS	County: Winneshiek
Facility Name: Rhonda Schnitzler	Facility Address: 2539 290th Street Ridgeway, IA 52165
Phone Number: 563-419-2133	
Responsible Official: Ollie Thurman Phone Number: 319-984-6600 Person(s) Present: 1) Ollie Thurman (via phone) 2) 3)	Mailing Address: 113 Castle Lane, P.O. Box 85 Denver, IA 50622 (Email: olliethurman@msn.com)
Date of This Inspection: 03/17/2026	Date of Last Inspection: N/A

*Be advised your facility may require, due to either SIC code or onsite management practices, an NPDES General Permit #1 (Stormwater permit).

IAC 567 Chapter 120.6: Petroleum Contaminated Soil (PCS) Analysis		Yes	No	NA		
PCS Analysis	120.6(2)"c"	Was the PCS analyzed for the following constituents: <ul style="list-style-type: none"> BTEX Testing – benzene, toluene, ethylbenzene, and xylene (OA-1) TEH-diesel Testing – total extractable hydrocarbons (OA-2) MTBE Testing – methyl tertiary-butyl ether must be analyzed for unless prior analysis has shown MTBE is not present in soil or groundwater Total RCRA Metals Testing – Resource Conservation and Recovery Act Metals must be analyzed for if the history of the petroleum contaminated site included solvents, batteries, leaded fuel, waste oil, or a gas station in operation prior to 1985 		<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>

Comments: Mr. Thurman stated that they are no longer testing for MTBE in soil within the UST program, only for water for Tier 1 and Tier 2 sites.

IAC 567 Chapter 120.7: Site Exploration and Suitability Requirements		Yes	No	NA		
Site Suitability Requirements	120.7(1)	Does the single use landfarm applicator have written confirmation from the site owner for one of the following: <ul style="list-style-type: none"> That any other landfarm created in the past three years within 15 feet of the proposed operating area has been closed pursuant to rule 567 – 120.12(455B) That no area within 15 feet of the proposed operating area has been used as a landfarm in the past three years <i>(Note: This rule does not apply for a landfarm utilized prior to October 20, 2004)</i>		<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/>
	120.7(2)	Has PCS been stored or landfarmed within 500 feet from a well (including agricultural drainage wells)? <i>(Note: Groundwater monitoring wells installed pursuant to paragraph 120.8(2)"c" and extraction wells as part as a remediation system are exempt from this requirement)</i>		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	120.7(3)	Has PCS been stored or landfarmed within 500 feet of a sinkhole?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	120.7(5)	Has PCS been stored or landfarmed within 200 feet of a stream, lake, pond, wetland, or other surface water of the state? <i>(Note: The setback requirement may be waived if the surface water has been constructed for pollution control purposes)</i>		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IAC 567 Chapter 120.7: Site Exploration and Suitability Requirements (Cont'd)		Yes	No	NA	
Site Suitability Requirements	120.7(6)	Has PCS been stored or landfarmed within 200 feet of a tile line surface intake?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	120.7(7)	Has PCS been stored or landfarmed within 200 feet of an occupied residence, recreational area, child care facility, educational facility, or health care facility?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	120.7(8)	Has PCS been stored or landfarmed within the 100 year flood plain?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	120.7(9)	Has PCS been stored or landfarmed on slopes greater than 5 percent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	120.7(10)"a"(2)	Do the soils in the operating area of the single use landfarm consists one or more of the following: <ul style="list-style-type: none">Clay, sandy clay, sandy clay loam, sandy loam, silty clay, silt clay loam, clay loam, loam, or silt loam as classified by USDA Textural Classification Chart for soils	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	120.7(10)"b"	Are soils in the operating area free of stones and debris larger than 4 inches in diameter?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	120.7(10)"c"	Do soils in the operating area have a pH greater than or equal to 6 and less than or equal to 9?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
120.7(10)"d"	Does the landfarm operating area have a minimum of 6 feet of soil over bedrock?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Comments: Mr. Thurman stated that this site had never been used for landfarming prior to this permit and that he reviewed the NRCS soil maps and no sinkhole was noted on the maps.

IAC 567 Chapter 120.8(1): Landfarm Design Requirements		Yes	No	NA	
Landfarm Design	120.8(1)"a"	Have PCS storage areas (if any) been constructed in compliance with the following requirements: <ul style="list-style-type: none">Over an impervious surface (e.g., tarp, concrete pad, plastic sheeting)Under a roof or tarp to minimize the infiltration of precipitationIn an area with minimal potential for stormwater run-on	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input checked="" type="checkbox"/>
	120.8(1)"b"	Have the landfarming plots being utilized been flagged pursuant to the following requirement: <ul style="list-style-type: none">Landfarming plots being utilized shall be flagged for one year after land application or until landfarm is closed, whichever is shorter	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Mr. Thurman indicated that no PCS was stored on site. The excavated soil was left on site at the gas station and stored on concrete until it could be directly land applied. Mr. Thurman noted that the area is staked, and he intended on removing the stake in April of this year, once final testing is completed and the landfarm is closed. While on site I observed the area was staked in all four corners. The area where PCS was land applied was approximately 17,750 square feet (90 feet x 195 feet). The submitted map showed a one-acre footprint. A review of the NRCS Custom Soil Resource Report submitted with the application showed 63.3% of the soils proposed to be applied on were greater than 5% slopes, which would be a violation of 567 IAC 107(9). On site observations indicate that the full one acre was not used and the PCS was applied on slopes of 5% or less. Mr. Thurman is reminded that PCS can not be applied on slopes greater than 5% and that these areas should be shaded out and the proposed area be reduced in the submittal to exclude soils with greater than 5 % slopes.

IAC 567 Chapter 120.9: Landfarm Operating Requirements		Yes	No	NA																
120.9(1)	Has only "Standard PCS" been landfarmed (unless a permit amendment is issued) on the plot being utilized as a single use landfarm? <i>(Note: Standard PCS – soil contaminated with gasoline, diesel fuel, kerosene, jet fuel, motor oil, hydraulic fluid, or some combination thereof)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																
120.9(2)	Has PCS that is in a saturated, slurry, or in a flammable condition been landfarmed at the single use landfarm?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>																
120.9(3)	Was PCS stored (if applicable) for seven days or less during landfarm season (April 1 – October 31)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>																
120.9(4)	If PCS was landfarmed outside of landfarming season, was it part of an emergency cleanup supervised by the department or did the following conditions exist: <ul style="list-style-type: none"> The operating area is free of snow The slope of the operating area is less than 3 percent The PCS is incorporated into the soil as soon as site conditions allow 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input checked="" type="checkbox"/>																
120.9(5)	When the landfarming plot was utilized, was only one application of a particular source and type landfarmed? <i>(Note: A single use landfarm may apply a subsequent application of PCS to the previously utilized landfarm plot if the plot has been closed pursuant to subrule 120.12(2).)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																
120.9(6)	Did the PCS application rate comply with the following table? The average concentration of benzene shall be calculated from all soil borings test results within the PCS excavation area. <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>Table 1</caption> <thead> <tr> <th>Average concentration of benzene (mg/kg)</th> <th>Ft² of landfarm area per yd³ of PCS applied</th> <th>Maximum thickness of unincorporated PCS</th> <th>Yd³ of PCS per acre of landfarm</th> </tr> </thead> <tbody> <tr> <td>0 < mg/kg < 10</td> <td>81 ft²</td> <td>4 inches</td> <td>537 yd³</td> </tr> <tr> <td>10 < mg/kg < 20</td> <td>162 ft²</td> <td>2 inches</td> <td>268 yd³</td> </tr> <tr> <td>20 < mg/kg</td> <td>324 ft²</td> <td>1 inch</td> <td>134 yd³</td> </tr> </tbody> </table> <i>(Note: PCS from an emergency cleanup supervised by the department may be land applied at a rate of 2 inches thick or at a rate of 162 ft² of landfarm area per cubic yard of PCS. PCS that is not contaminated with benzene or MTBE, but is contaminated with toluene, ethylbenzene, xylene, TEH-diesel, or some combination thereof, shall be land applied at a rate of 81 ft² of landfarm area per cubic yard of PCS)</i>	Average concentration of benzene (mg/kg)	Ft ² of landfarm area per yd ³ of PCS applied	Maximum thickness of unincorporated PCS	Yd ³ of PCS per acre of landfarm	0 < mg/kg < 10	81 ft ²	4 inches	537 yd ³	10 < mg/kg < 20	162 ft ²	2 inches	268 yd ³	20 < mg/kg	324 ft ²	1 inch	134 yd ³	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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10 < mg/kg < 20	162 ft ²	2 inches	268 yd ³																	
20 < mg/kg	324 ft ²	1 inch	134 yd ³																	
120.9(8)	Has solid waste that is not PCS (e.g., pipe) been removed and properly disposed of? <i>(Note: This includes all rubble, stones, debris larger than 4 inches in diameter, or anything that interferes with incorporating and turning of the PCS)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																
120.9(9)	Was the PCS incorporated into the soil by tilling, disking, or other suitable means within 48 hours after it was land applied or before a precipitation event, whichever was sooner? <i>(Note: PCS must not be incorporated deeper than 12 inches)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																
120.9(10)	After incorporation, was the PCS turned by tilling, disking, or other suitable means at least once per month for the first three months during landfarming season?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																
120.9(11)	Were crops for human or livestock consumption grown within 15 feet from the utilized landfarm plot? <i>(Note: Crops for human and livestock consumption may be grown at a single use landfarm after the landfarm plot is no longer required to be flagged pursuant to subrule 120.9(7).)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>																

IAC 567 Chapter 120.9: Landfarm Operating Requirements (Cont'd)		Yes	No	NA			
Landfarm Operating Requirements	120.9(13)	<p>Has PCS been removed from a single use landfarm before the landfarm was closed or the following conditions were met:</p> <ul style="list-style-type: none"> • One sample from each 2,500 ft² (e.g., 50 foot x 50 foot area) of landfarm plot is analyzed pursuant to subparagraphs 120.6(2) "c" (1), (2), (3). A minimum of one sample per landfarm plot shall be obtained. All samples shall be obtained from between the top 2 to 6 inches of soil. • The results of the tests in paragraph 120.12(1) "a" demonstrate that petroleum constituent concentrations for benzene, toluene, ethylbenzene, TEH-diesel, and MTBE are below the detection limits required by 567 - Chapter 135. • Records of the lab results, amount of PCS removed, and the exact final location of the PCS shall be maintained by the landfarm. 			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>				
		<input type="checkbox"/>	<input type="checkbox"/>				
		<input type="checkbox"/>	<input type="checkbox"/>				

Comments: Mr. Thurman indicated that the soil was disked within 24 hours of land application and was applied October 6th, after the crop was harvested. Before crops are planted in the spring of 2026 he believes this site will be closed. It was noted that a disk was on site adjacent to the PCS soil and there was evidence the PCS soil had been disked.

IAC 567 Chapter 120.10 and 120.11: ERRAP Requirements		Yes	No	NA			
Reporting & Record-Keeping Requirements	120.10(1)	Is an Emergency Response and Remedial Action Plan (ERRAP) readily available? <i>(Note: Single use landfarm applicators shall have employees carry a copy of the ERRAP document to each site where operations are taking place)</i>			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	120.10(3)	At a minimum, have all employees received annual training sufficient to understand and utilize ERRAP documents?			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	120.11(1) "a" and "b"	Has a complete Landfarming and Storage Notification Form(s) been submitted to the department central office as well as the department field office with jurisdiction over the landfarm before receipt of PCS for storage and land application events?			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	120.11(2)	<p>Has the single use landfarm agency maintained records of all information related to compliance with this chapter and the permit throughout the life of the landfarm and for three years after landfarm closure?</p> <ul style="list-style-type: none"> • Permit application information • PCS analysis and characterization • Site suitability information • Specific design requirements • Operation information • ERRAP documents • Reports that were submitted to IDNR • Closure information 			<input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

IAC 567 Chapter 120.12: Single Use Landfarm Closure		Yes	No	NA
Landfarm Closure	120.12(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<p>If a landfarm is considered closed by the landfarming agency, has it been 3 years after the PCS was land applied or at least 6 months and the following was documented:</p> <ul style="list-style-type: none"> One sample from each 10,000 ft² (e.g., 100 x 100 foot area) of a landfarm plot is analyzed pursuant to subparagraphs 120.6(2) "c" (1), (2), and (3) (BTEX, TEH-diesel, MTBE). A minimum of one sample per landfarm plot shall be obtained. All samples shall be obtained from between the top 2 to 6 inches of soil. The results from the previous paragraph demonstrate that petroleum constituent concentrations are less than 0.54 mg/kg for benzene, 42 mg/kg for toluene, 15 mg/kg for ethylbenzene, 3800 mg/kg for TEH-diesel and 0.02 mg/kg for MTBE. 	<input type="checkbox"/>	<input type="checkbox"/>	

Comments:

Summary of Requirements:	Compliance Date:
1)	
2)	
3)	
4)	
5)	

Summary of Reminders:
1) Do not land apply PCS on slopes greater than 5%.
2)
3)
4)
5)

Inspector Environmental Specialist	Reviewer Environmental Specialist Senior
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