NOV 0 3 2016

Mr. Douglas S. Arnold
Partner and Co-Chair
Alston & Bird LLP
Environmental, Energy & Natural Resources Practice Group
1201 West Peachtree Street
Atlanta, Georgia 30309-3424

RE: Former Electrolux Facility
601 East Central Street, Jefferson, Iowa
EPA ID No. IAD047055140

Dear Mr. Arnold:

The U.S. Environmental Protection Agency considers the following documents to comprise the Resource Conservation and Recovery Act Facility Investigation Report for the subject facility.

1. Site Investigation Information dated 5/13/11 from Golder Associates to the EPA
2. Site Bore Logs dated 5/13/11
3. Electrolux Site Information dated 5/13/11
4. Letter from IDNR to John Heer with Electrolux dated 8/30/11 regarding the Phase II Environmental Site Assessment
5. The EPA Toxicologist Screening Level Assessment dated 9/9/11
6. Iowa Secretary of State Information dated 9/21/11
7. The EPA Request for Information Letter to John Heer with Electrolux dated 10/13/11
8. The EPA letter to John Heer with Electrolux dated 10/13/11 proposing Statement of Work
9. Letter from John Heer with Electrolux to the EPA dated 10/26/11 requesting a meeting with the EPA
10. Letter from IDNR to John Heer with Electrolux dated 10/28/11, stating that the EPA has offered to serve as lead agency for this site
11. Greene County Iowa Assessor Information dated 11/29/11
12. Email from the EPA to John Heer with Electrolux dated 11/29/11 regarding a meeting
13. Electrolux 12/5/11 response to the EPA Request for Information letter
14. Work Plan for Supplemental Soil and Groundwater Assessment dated January 2012 from Golder Associates to the EPA
15. Comments from the USCOE to the EPA dated 3/8/12 regarding Electrolux Work Plan for Supplemental Soil and Groundwater Assessment dated January 2012
16. Email from the EPA to Doug Arnold representing Electrolux dated 3/23/12 regarding Electrolux Work Plan for Supplemental Soil and Groundwater Assessment dated January 2012
17. The EPA Memo dated 3/26/12 regarding EPA QAPP comments on Electrolux Work Plan for Supplemental Soil and Groundwater Assessment dated January 2012
18. Email from the EPA to Doug Arnold representing Electrolux dated 3/27/12, regarding the EPA QAPP comments on Electrolux Work Plan for Supplemental Soil and Groundwater Assessment dated January 2012

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CONCURRENCES		
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19. Email from Doug Arnold representing Electrolux to the EPA dated 4/24/12, transmitting response to the EPA comments
20. Letter from the EPA to Doug Arnold representing Electrolux dated 6/8/12, regarding moving forward with work at the site
21. Letter from Doug Arnold representing Electrolux to the EPA dated 6/21/12, regarding work at the site
22. Supplemental Soil and Groundwater Assessment dated 9/2012, from Golder Associates to the EPA
23. Letter from the EPA to Doug Arnold representing Electrolux dated 3/5/13, stating that this facility is part of the 2020 corrective action universe
24. Email from Doug Arnold dated 3/15/13, stating that Electrolux does not agree that the facility is part of the 2020 corrective action universe.
25. Supplemental Soil and Groundwater Assessment Addendum dated 5/2013, from Golder Associates to the EPA
26. Jefferson Groundwater Investigation dated 12/2013
27. Soil and Groundwater Assessment Addendum NO. 2 dated January 2014 from Golder Associates to the EPA
28. Test America analytical results dated 5/6/14
29. Test America analytical results dated 7/24/14
30. Test America analytical results dated 7/31/14
31. Test America analytical results dated 10/20/14
32. Test America analytical results dated 10/21/14
33. Test America analytical results dated 10/22/14
34. Test America analytical results dated 10/24/14
35. Email transmitting analytical results dated 2/2/15
36. Email transmitting analytical results dated 4/24/15
37. Email transmitting meeting Agenda dated 6/13/15
38. Webinar Discussion Material dated 8/26/15
39. Email with well information dated 9/14/15
40. Proposed Monitoring Well Location Map dated 9/15/15
41. Well Information Records dated 10/15/15
42. Chris Jump, with the EPA, field notes dated 10/21/15
43. Email from Doug Arnold transmitting analytical results dated 11/30/15
44. Site Bore Logs dated 12/9/15
45. Electrolux Site Information dated 4/5/16
46. Jefferson Municipal Water Supply Well analytical results dated 10/6/16
47. Telephone Conversation Record by Brian Mitchell, with the EPA, documenting who is served by the municipal water supply system dated 10/6/16
48. Site Summary Report from Golder Associates to the EPA dated October 2016

The above listed documents are hereby approved by the EPA, with the following exception. An example of such exception can be found on page 30 of the Site Assessment Summary Report which was submitted to the EPA via email on October 21, 2016. A sentence on page 30 reads "There are no receptors such as public drinking water supply wells, streams or rivers, public use areas, or occupied buildings (i.e., vapor intrusion concerns) near the Site." The EPA disagrees with and does not approve this statement and all similar statements contained in any document submitted to the EPA regarding the subject facility. There are several municipal drinking water supply wells located within one mile of the subject facility and in fact a map provided to the EPA by Mr. Tom Schilling, Water Operator for the City of Jefferson Iowa, shows the 10 year capture zone for these municipal water supply wells to be adjacent to the subject facility. Thus, the subject facility would likely fall in the 15 year capture zone.

Additionally, there are several homes located within ¼ of a mile of the subject facility. The EPA considers these potential receptors to be near the subject facility, and understands that Electrolux intends to further evaluate potential pathways for these receptors as part of the next step to identify an appropriate site remedy.

Please contact me if you have any questions. I can be reached directly at (913) 551-7633.

Sincerely,

Brian Mitchell
RCRA Corrective Officer
Waste Remediation and Permitting Branch
Air and Waste Management Division