One Titan
Titan International, Inc.
Mr. Michael Troyanovich
Corporate Secretary and General Council
201 Spruce Street
Quincy, Illinois 62301

Re: Administrative Order, Docket No. 86-F0011
DICO Ecological Risk Assessment OU4, October 2015
Des Moines TCE Site, Des Moines Iowa

Dear Mr. Troyanovich:

The U.S. Environmental Protection Agency (EPA) finalized the Ecological Risk Assessment for Operable Unit 4 at the Des Moines TCE Site (Site). The report is attached for your review. The assessment determined that direct exposure to sediment and soil at the South Pond Area presents an ecological risk. The risks identified in the South Pond Area include, but are not limited to:

- Significant ecological risk due to Dieldrin contamination.
- Potential risk due to Chlordane for soil invertebrates and benthic macroinvertebrates, but not for wildlife receptors.
- Probable risks to soil invertebrates and benthic invertebrates due to Aroclor 1260.

As stated in the 2013 Five-Year Review, the protectiveness statement for the Site was deferred and was to be made once the Ecological Risk Assessment was completed. Due to the ecological risk in the South Pond Area, the deferred protectiveness statement for the Site will be changed to not protective in a Five-Year Review Addendum. This determination was made by following the guidelines set forth in an EPA memorandum dated September 13, 2012, clarifying the use of protectiveness determinations for Comprehensive Environmental Response, Confirmation, and Reliability Act Five-Year Reviews (https://semspub.epa.gov/work/11/174829.pdf). Additional work will be necessary to address the ecological risk and to determine if a potential risk exists for human health in the South Pond Area.

If you have any questions concerning this matter, please contact me at (913) 551-7977.

Sincerely,

Erin S. McCoy, P.G.
Remedial Project Manager
Iowa/Nebraska Remedial Branch
Superfund Division

Cc: Mr. Brian Mills, Consultant, DICO
Mr. Gazi George, Consultant, DICO
Mr. Ty Steinman, DICO
Mr. Hylton Jackson, INDR