Alex Moon

IDNR

Dear Mr. Moon:

This letter pertains to the former office building and the production building located on the Dico property in Des Moines, Iowa. This letter supersedes the letter EPA previously transmitted to you on June 8, 2017, regarding the potential demolition of the office building. I understand that IDNR is interested in pursuing demolition of these buildings on the Dico property in order to facilitate redevelopment of the property, and EPA supports this objective.

Office Building

The former office building contains no known contamination and is not subject to any EPA decision documents or administrative orders. In the absence of any documentation regarding construction or historic uses of this building, we recommend that IDNR perform an inspection of the building to evaluate the presence of asbestos and any other potential contaminants.

Since other buildings on the site contained PCBs in building insulation, it is possible that the office building contains similar material. The insulation containing PCBs was yellow batt insulation with a foil backing, and the PCBs were believed to be associated with the adhesive used to secure the foil backing onto the insulation. EPA believes it would be prudent for IDNR to determine whether this type of insulation is present within the office building, and if so, to test the insulation prior to disposal.

Given the historic use of other buildings on the property and the documented presence of pesticides and dioxins in concrete building structures on the property, we recommend that IDNR perform limited wipe testing of the office building to document the presence or absence of contamination.

EPA understands that IDNR will work with Dico to test and remove the office building under the direction and oversight of IDNR. EPA approval or oversight is not required for decisions made regarding the office building. EPA is available to assist with the sampling discussed above, if necessary.

Production Building

Like the office building, the former production building is not subject to any EPA decision documents or administrative orders. In 2016, the former production building was sampled to determine whether contamination was present. Sample results from the analysis for total concentrations of pesticides were compared to the TCLP regulatory level in 40 C.F.R. § 261.24. Seven of 15 samples exceeded a 1:1 comparison for endrine and/or heptachlor. None exceeded a 20:1 comparison. Based on this sampling, the former office building contains no hazardous waste characteristics, and therefore may be disposed

of as non-hazardous waste, as follows:

- EPA recommends IDNR perform an inspection of the building to evaluate the presence of asbestos prior to building demolition.
- The 2016 sampling documented low levels of PCBs within the production building, all under 1.5 ppm. IDNR should ensure that, prior to disposal of the PCB insulation within the production building, a bulk sample is collected to determine the PCB concentration of the bulk insulation prior to disposal.

Following demolition of the production building, soil samples should be collected in the location of former TCE degreasing vat, to ensure elevated levels of TCE in soil are not present. Prior soil borings have indicated that the TCE contamination source area is likely below the water table.EPA understands that IDNR will work with Dico to test and remove the production building under the direction and oversight of IDNR. EPA approval or oversight is not required for decisions made regarding the production building. EPA is available to assist with the sampling discussed above, if necessary.

As stated above, EPA approval or oversight is not required for decisions made regarding the office or production building. IDNR or Dico should notify EPA, however, about any debris that will remain on-site following building demolition, as certain on-site disposal restrictions may apply.

Please note that all other buildings remaining on the Dico property are considered part of the Superfund site as they contain varying degrees of contamination and are subject to certain testing and disposal requirements. EPA plans to work with IDNR and Dico regarding the best path forward for demolition of the contaminated buildings in the near future.