February 17, 2020

MR KEN BUCHHOLZ
ASSESSMENT EMERGENCY RESPONSE & REMOVAL BRANCH
US EPA REGION VII
11201 RENNER BLVD
LENEXA KS 66219

RE: Clinton Engines in Maquoketa, Iowa

Dear Mr. Buchholz,

The Iowa Department of Natural Resources (Iowa DNR) is referring the former Clinton Engines site in Maquoketa, Iowa to the United States Environmental Protection Agency Region VII for a Time Critical Removal Action to address risk associated with chlorinated solvent contamination from historic releases into the environment. A Request for Federal Action form is enclosed with this letter along with supporting documentation. A brief summary of this site is included below.

Background
The property has been utilized for industrial purposes since approximately 1945. Clinton Engines acquired the property in 1950 from The Maquoketa Company. The site was used for the production of small engines and included a foundry, machine shops, cast and painting operations, as well as underground storage tank(s) for fuel oil. The company officially closed in 1999 and the property was donated to the City in 2000.

A Phase I/II Assessment dated October 15, 1999, was received by the Contaminated Sites Section of the Iowa DNR on March 23, 2005. An Initial Site Screening (ISS) was completed on June 2, 2005 and required additional investigation. The site was enrolled in the voluntary Land Recycling Program (LRP) in April 2008. Since that time, further site assessment has been sporadic. A Site Assessment Report was received in 2013. Groundwater exceeded LRP Statewide Standards (SWS) and remained undefined both vertically and horizontally.

In 2014, the Iowa DNR required vapor sampling in the museum due to elevated Vinyl Chloride concentrations in groundwater. Sub-slab samples collected from the museum in April, July, October 2014 and January 2015 exceeded reporting limits but were not compared to screening levels. However, they exceed current EPA Vapor Intrusion Screening Levels (VISLs) for commercial sub-slab soil gas concentrations. In December 2014, the Iowa DNR required additional assessment. In September 2015, the City presented a workplan that recommended additional sub-slab soil gas and indoor and outdoor vapor sampling. In October 2015 that plan was accepted by the Iowa DNR. At that time, activity at the site stalled.

In September 2017, the Iowa DNR issued a letter to the City requiring information on future plans to address the contamination. In May 2019 the Iowa DNR was given a report documenting indoor air exceedances at the Clinton Engines Museum in March 2018. The following actions took place as a result: chemicals stored in the basement of the museum were relocated, passive turbine vents were installed on the stacks exiting the sump pit, repair of cracks in the basement floor and foundation were initiated, the consultant starts investigation of

air turnover in the building, a sign was posted at every entrance warning women that are pregnant or could be pregnant from entering the building and also included information on chronic and acute risks of TCE exposure.

Currently, the most recent indoor air testing done at the museum is from December 2019. Concentrations of TCE continue to exceed EPA's VISLs indicating more action is needed to address the vapor intrusion. Increasing air turnover at the museum has been suggested but no timeline has been established. Groundwater information from the July 2019 Groundwater Assessment Report indicates a vapor intrusion possibility in the areas surrounding the former Clinton Engines facility. The City has composed a letter to residents in the assumed plume area to notify them of the contamination, ask them to identify any groundwater receptors on their property, and offer to perform sub-slab sampling in the structures on their property.

This site warrants entry into the Superfund Active site inventory for further investigation due to both the documented vapor intrusion occurring onsite and also to the potential for wide-spread vapor intrusion throughout the community as a result of a historic release of chlorinated solvents. Attached are the RFA Form, the December 2019 Indoor Air Sample Results from the Clinton Engines Museum, and July 2019 Groundwater Assessment Report. The Iowa DNR Project Manager for the former Clinton Engines site is Shelly Nellesen. Please contact her at shelly.nellesen@dnr.iowa.gov and (515)725-8372 to keep her updated on Superfund activities or if she can provide information or assistance.

If you have questions about the RFA please contact me at (515)330-8581 or amie.davidson@dnr.iowa.gov.

Sincerely,

Amie Davidson

Amie Davidson
Land Quality Bureau Chief
Iowa Department of Natural Resources

Enc: December 2019 Indoor Air Samples, Clinton Engines Museum
July 2019 Groundwater Assessment Report

REQUEST FOR FEDERAL ACTION

The Iowa Department of Natural Resources requests, pursuant to Section 128(b)(l)(B)(i) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9608(b)(1)(B)(i), the assistance of the United States Environmental Protection Agency, Region 7 (EPA) in the evaluation of site conditions and/or the performance of a response action, for the following site:

Clinton Engines
Site Name

605 East Maple Street
Street Address/Property Description

Maquoketa
City

Jackson
County

Iowa 52060
State

By making this request, the Requesting Agency recognizes that the EPA, or any other entity acting on behalf of the EPA, may use its authorities under CERCLA, the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR Part 300, or any other federal statute, regulation or response program, to respond to and recover costs incurred in response to releases or threats of releases of hazardous substances, pollutants and/or contaminants at or from the site. By making this request, the Requesting Agency waives notice as otherwise required by Section 128(b)(1)(D) ofCERCLA, 42 U.S.C. § 9628(b)(1)(D). The signatory of this request is authorized to make this request on behalf of the Requesting Agency.

Date 2/17/20

Amie Davidson Amie Davidson
Name

Land Quality Bureau Chief
Title

Iowa Department of Natural Resources
Requesting Agency