



February 6, 2019

JOEY CUPP
PILOT TRAVEL CENTERS LLC
5508 LONAS ROAD
KNOXVILLE TN 37909

SUBJECT: Approval of Cessation of Free Product Activities
Eligibility for No Further Action Certificate
Pilot Travel Center #373, 11957 Douglas Ave., Urbandale, Iowa
Registration No. 198606077 LUST No. 9LTP73

Dear Mr. Cupp:

The Department of Natural Resources (DNR) received a report titled *Alternative Free Product Termination Request* for the referenced site on January 23, 2019. Thank you for the submittal. The report included a detailed justification for why all free product activities should cease along with supporting documentation. The site received a no action required classification in June 2013.

Upon review of the report and file information, the DNR accepts the recommendation. Free product activities may cease at the site and the property is now eligible for a No Further Action certificate. The certificate will state that free product persists underneath the site.

Iowa Administrative Code (Chapter 567-39 and Chapter 567-135.12(6)'f') requires plugging of monitoring wells and soil borings that access groundwater. An Abandoned Water Well Plugging Record (DNR Form 542-1226) should be completed for each monitoring well, soil gas well, and soil boring. Contact the designated county agent prior to plugging the wells and borings. Questions pertaining to well-plugging procedures should be directed to the Water Supply Section at 515/725-0282 or the designated county agent.

You may retain monitoring wells at the site for future use. However, if you do so, you must submit a letter to the DNR identifying the monitoring wells to be retained, the reason for retaining the monitoring wells, and a written plan for monitoring well maintenance and security. The monitoring wells must be fitted with lockable protective devices and clearly labeled.

A No Further Action Certificate shall be issued by the DNR pursuant to Iowa Code § 455B.474(1)a(8)(a). However, as residual free product will remain at the site, the No Further Action Certificate will state, "It is acknowledged that residual free product remains at this site." The following must be submitted for the DNR to issue a no further action certificate:

1. A copy of the most recent deed or contract of sale with an accurate and complete legal description.
NOTE: A legal description obtained from a tax form is not acceptable.
2. Copies of the Abandoned Water Well Plugging Records (DNR Form 542-1226) if they have not already been submitted. Please remember to include the LUST number on each Well Plugging Record, and provide the appropriate signatures on each form.

Once the no further action certificate is issued by the DNR, the certificate recipient is responsible for filing this certificate with the Polk County Recorder, pursuant to Iowa Code § 455B.474(1)a(8)(c). Within 30 days of the issue date you must also provide the DNR with a file-stamped copy of the recorded No Further Action Certificate for it to be considered effective.

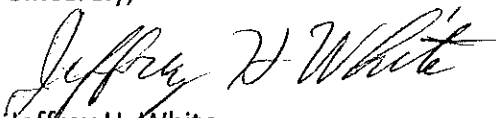
Submit the legal description and well plugging forms to:

LUST Coordinator
Department of Natural Resources
502 East Ninth Street
Des Moines, IA 50319-0034

Thank you for your cooperation with this project. Please contact me at (515) 725-8325 or by e-mail at jeff.white@dnr.iowa.gov if you have questions or concerns.

In all correspondence regarding this project, include the LUST number, which is indicated in the Subject heading of this letter.

Sincerely,



Jeffrey H. White
Environmental Specialist Senior
Underground Storage Tank Section

cc: Field Office 5
Ray Widder, Geode Environmental, PO Box 845, Johnston, Iowa 50131

9LTP73

~~9LTL73~~

Collins, Tom [DNR]

From: rwidder@geode-env.com
Sent: Wednesday, October 21, 2015 10:22 AM
To: Collins, Tom [DNR]; 'Thomas J. Norris'
Cc: 'Mike Chapman'; 'Joey Cupp'; 'Max Burmeister'
Subject: Pilot 373, 8606077
Attachments: 373 10-15 soil sample.PDF

Tom,
Attached you will find the laboratory results for the request soil sample obtained at the above referenced facility on 10/2/15. This sample was taken at your direction as relayed to me by Max Burmeister with ECS. Results indicate a concentration of 6,770 mg/kg diesel. This was the only chemical above minimum target levels. The release occurred between PMW1 and PMW2 associated with the 9LTP73 release which occurred on 4/16/12. This current concentration exceeds the maximum value found during the 9LTP73 investigation. However, the concentration does not exceed pathway target limits for any receptors found in the applicable search radii.

We will complete a closure report associated with the line repairs. We do not believe any additional actions are warranted at this time. Ongoing monthly free product checks will include PMW1 and PMW2. If unusual results are observed, you will be notified.

Ray Widder
Environmental Compliance Services, Inc.

October 13 2015

Ray Widder
Environmental Compliance Services, Inc.
PO Box 845
Johnston, IA 50131

RE: Environmental Sampling
PT-000373

Enclosed are the results of analyses for samples received by the laboratory on 10/02/15 14:10. If you have any questions concerning this report, please feel free to contact me at 1-800-858-5227.

ANALYTICAL REPORT FOR SAMPLES

Client Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
10-2-15R	1J50154-01	Soil	10/02/15 12:45	10/02/15 14:10

Reported
10/13/15 20:46

FORM: CCR 7-97

Environmental Compliance Services, Inc.
PO Box 845
Johnston, IA 50131

Project: Environmental Sampling
Project Number: PT-000373
Project Manager: Ray Widder

Reported
10/13/15 20:46

10-2-15R

1J50154-01 (Soil)

Date Sampled: 10/2/2015 12:45:00PM

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Keystone Laboratories, Inc. - Newton

Determination of Volatile Petroleum Hydrocarbons

Methyl-1-butyl Ether (MTBE)	ND	0.195	mg/kg	50	1YJ0225	10/05/15	10/06/15 04:52	OA-1 (GC/MS)	
Benzene	0.100	0.097	"	"	"	"	"	"	
Toluene	0.559	0.097	"	"	"	"	"	"	
Ethylbenzene	0.938	0.097	"	"	"	"	"	"	
Xylenes, total	2.83	0.195	"	"	"	"	"	"	
Ethyl-tert-Butyl Ether (ETBE)	ND	0.195	"	"	"	"	"	"	
Di-iso-Propyl Ether (DIPE)	ND	0.195	"	"	"	"	"	"	
tert-Amyl Methyl Ether (TAME)	ND	0.195	"	"	"	"	"	"	
tert-Butyl Alcohol (TBA)	ND	4.87	"	"	"	"	"	"	

Surrogate: 4-Bromofluorobenzene 97.6 % 76-135 " " " "

Determination of Extractable Petroleum Hydrocarbons

TEH, as gasoline	ND	5	mg/kg	1	1YJ0144	10/05/15	10/11/15 04:14	Iowa OA-2	
TEH, as #2 diesel fuel	OVERRANGE	5	"	"	"	"	"	"	
TEH, as waste oil	ND	5	"	"	"	"	"	"	
Total Extractable Hydrocarbons	6770	5	"	"	"	"	"	"	

Surrogate: Pentacosane 123 % 25-135 " " " "

Environmental Compliance Services, Inc.
PO Box 845
Johnston, IA 50131

Project: Environmental Sampling
Project Number: PT-000373
Project Manager: Ray Widder

Reported
10/13/15 20:46

10-2-15R

1J50154-01RE1 (Soil)

Date Sampled: 10/2/2015 12:45:00PM

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Keystone Laboratories, Inc. - Newton

Determination of Extractable Petroleum Hydrocarbons

TEH, as #2 diesel fuel	6770	50	mg/kg	10	1YJ0144	10/05/15	10/12/15 15:16	Iowa OA-2	
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Environmental Compliance Services, Inc.
PO Box 845
Johnston, IA 50131

Project: Environmental Sampling
Project Number: PT-000373
Project Manager: Ray Widder

Reported
10/13/15 20:46

Determination of Volatile Petroleum Hydrocarbons - Quality Control

Keystone Laboratories, Inc. - Newton

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1YJ0225 - EPA 5030B

Blank (1YJ0225-BLK1)

Prepared: 10/05/15 Analyzed: 10/06/15

Methyl-t-butyl Ether (MTBE)	ND	0.200	mg/kg							
Benzene	ND	0.100	"							
Toluene	ND	0.100	"							
Ethylbenzene	ND	0.100	"							
Xylenes, total	ND	0.200	"							
Ethyl-tert-Butyl Ether (ETBE)	ND	0.200	"							
Di-iso-Propyl Ether (DIPE)	ND	0.200	"							
tert-Amyl Methyl Ether (TAME)	ND	0.200	"							
tert-Butyl Alcohol (TBA)	ND	5.00	"							

Surrogate: 4-Bromofluorobenzene 0.0994 " 0.100000 99.4 76-135

LCS (1YJ0225-BS1)

Prepared & Analyzed: 10/05/15

Methyl-t-butyl Ether (MTBE)	11.28	0.200	mg/kg	11.0000		103	72-132
Benzene	5.277	0.100	"	5.00000		106	75-126
Toluene	5.171	0.100	"	5.00000		103	77-125
Ethylbenzene	5.082	0.100	"	5.00000		102	78-125
Xylenes, total	15.26	0.200	"	15.0000		102	77-126
Ethyl-tert-Butyl Ether (ETBE)	11.34	0.200	"	11.2000		101	77-133
Di-iso-Propyl Ether (DIPE)	11.01	0.200	"	10.3600		106	67-127
tert-Amyl Methyl Ether (TAME)	11.06	0.200	"	10.7200		103	75-124
tert-Butyl Alcohol (TBA)	93.32	5.00	"	104.040		89.7	65-133

Surrogate: 4-Bromofluorobenzene 0.101 " 0.100000 101 76-135

Matrix Spike (1YJ0225-MS1)

Source: 1151654-01

Prepared & Analyzed: 10/05/15

Methyl-t-butyl Ether (MTBE)	105.2	1.90	mg/kg	104.563	ND	101	61-134
Benzene	46.52	0.951	"	47.5285	ND	97.9	71-123
Toluene	46.88	0.951	"	47.5285	ND	98.6	67-127
Ethylbenzene	48.56	0.951	"	47.5285	2.573	96.7	61-132
Xylenes, total	148.8	1.90	"	142.586	12.35	95.7	54-142
Ethyl-tert-Butyl Ether (ETBE)	105.0	1.90	"	106.464	ND	98.7	65-138
Di-iso-Propyl Ether (DIPE)	103.3	1.90	"	98.4791	ND	105	58-132
tert-Amyl Methyl Ether (TAME)	102.6	1.90	"	101.901	ND	101	67-133
tert-Butyl Alcohol (TBA)	742.4	47.5	"	988.973	ND	75.1	57-145

Surrogate: 4-Bromofluorobenzene 0.0952 " 0.0950570 100 76-135

Environmental Compliance Services, Inc.
PO Box 845
Johnston, IA 50131

Project: Environmental Sampling
Project Number: PT-000373
Project Manager: Ray Widder

Reported
10/13/15 20:46

Determination of Volatile Petroleum Hydrocarbons - Quality Control

Keystone Laboratories, Inc. - Newton

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1YJ0225 - EPA 5030B

Matrix Spike Dup (1YJ0225-MSD1)

Source: H51654-01

Prepared: 10/05/15 Analyzed: 10/06/15

Methyl-t-butyl Ether (MTBE)	106.4	1.92	mg/kg	105.769	ND	101	61-134	1.17	23	
Benzene	47.79	0.962	"	48.0769	ND	99.4	71-123	2.69	26	
Toluene	46.75	0.962	"	48.0769	ND	97.2	67-127	0.282	29	
Ethylbenzene	48.48	0.962	"	48.0769	2.573	95.5	61-132	0.153	30	
Xylenes, total	148.6	1.92	"	144.231	12.35	94.5	54-142	0.126	30	
Ethyl-tert-Butyl Ether (ETBE)	107.3	1.92	"	107.692	ND	99.6	65-138	2.11	24	
Di-iso-Propyl Ether (DIPE)	102.8	1.92	"	99.6154	ND	103	58-132	0.468	24	
tert-Amyl Methyl Ether (TAME)	103.5	1.92	"	103.077	ND	100	67-133	0.878	21	
tert-Butyl Alcohol (TBA)	781.2	48.1	"	1000.38	ND	78.1	57-145	5.10	30	

Surrogate: 4-Bromofluorobenzene 0.0974 " 0.0961538 101 76-135

Environmental Compliance Services, Inc.
PO Box 845
Johnston, IA 50131

Project: Environmental Sampling
Project Number: PT-000373
Project Manager: Ray Widder

Reported
10/13/15 20:46

Determination of Extractable Petroleum Hydrocarbons - Quality Control

Keystone Laboratories, Inc. - Newton

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1YJ0144 - 3545 OA-2 PFE

Blank (1YJ0144-BLK1)

Prepared: 10/05/15 Analyzed: 10/08/15

TEH, as gasoline	ND	5	mg/kg							
TEH, as #2 diesel fuel	ND	5	"							
TEH, as waste oil	ND	5	"							
Total Extractable Hydrocarbons	ND	5	"							

Surrogate: Pentacosane	1.95		"	2.51400		77.5	25-135			
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LCS (1YJ0144-BS1)

Prepared: 10/05/15 Analyzed: 10/08/15

TEH, as #2 diesel fuel	292.4	5	mg/kg	427.400		68.4	45-106			
Surrogate: Pentacosane	2.49		"	2.51400		99.2	25-135			

Matrix Spike (1YJ0144-MS1)

Source: 11S2006-04

Prepared: 10/05/15 Analyzed: 10/08/15

TEH, as #2 diesel fuel	272.6	5	mg/kg	424.640	ND	64.2	12-116			
Surrogate: Pentacosane	2.96		"	2.49776		118	25-135			

Matrix Spike Dup (1YJ0144-MSD1)

Source: 11S2006-04

Prepared: 10/05/15 Analyzed: 10/11/15

TEH, as #2 diesel fuel	253.5	5	mg/kg	425.697	ND	59.5	12-116	7.28	30	
Surrogate: Pentacosane	2.56		"	2.50398		102	25-135			

Reference (1YJ0144-SRM1)

Prepared: 10/05/15 Analyzed: 10/11/15

Surrogate: Pentacosane	2.89		mg/kg	2.51400		115	25-135			
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Certified Analyses Included in This Report

Method/Matrix	Analyte	Certifications
Iowa OA-2 in Soil	Total Extractable Hydrocarbons	SIA1X
OA-1 (GC/MS) in Soil	Methyl-t-butyl Ether (MTBE)	SIA1X
	Benzene	SIA1X
	Toluene	SIA1X
	Ethylbenzene	SIA1X
	Xylenes, total	SIA1X

Environmental Compliance Services, Inc.
PO Box 845
Johnston, IA 50131

Project: Environmental Sampling
Project Number: PT-000373
Project Manager: Ray Widder

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10/13/15 20:46

Code	Certifying Authority	Certificate Number	Expires
KS-KC	Kansas Department of Health and Environment-KC	E-10110	09/30/2015
KS-NT	Kansas Department of Health and Environment (NELAP)	E-10287	10/31/2015
MO-KC	Missouri Department of Natural Resources	140	04/30/2015
SIAIX	Iowa Department of Natural Resources	95	02/01/2016

Environmental Compliance Services, Inc.
PO Box 845
Johnston, IA 50131

Project: Environmental Sampling
Project Number: PT-000373
Project Manager: Ray Widder

Reported
10/13/15 20:46

Notes and Definitions

O-11A OVERRANGE

DET Analyte DETECTED

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

dry Sample results reported on a dry weight basis

RPD Relative Percent Difference

Environmental Compliance Services, Inc.
PO Box 845
Johnston, IA 50131

Project: Environmental Sampling
Project Number: PT-000373
Project Manager: Ray Widder

Reported
10/13/15 20:46

Sue Thompson

Sue Thompson
Project Manager II

TIER 2 DATA BEFORE MODELING

example

9LTP73

Free Product Present? Yes	Groundwater encountered? Yes	SCR conversion? No
TEH-diesel required? Yes	TEH-waste oil required? No	Bedrock: No,

Analytical Data							
Groundwater Maximums				Soil Maximums			
	Date	B/MW #	Concentration (ug/L)		Date	B/MW #	Concentration (mg/kg)
B	11/01/2012	PMW4	71.4	B	10/21/2015	TEST	1.
T	08/20/2012	PMW3	55.9	T	10/21/2015	TEST	1.
E	11/01/2012	PMW4	42.6	E	10/21/2015	TEST	1.
X	08/20/2012	PMW3	94.5	X	08/15/2012	PMW3	1.64
TEH d	11/01/2012	PMW4	127,000.	TEH d	10/21/2015	TEST	6,770.
TEH wo	11/01/2012	PMW4	<38,000.	TEH wo	10/25/2012	PMW4	<780.

Soil Gas	Benzene		Toluene		Ethylbenzene		TEH d	
	Sampled Soil Gas	Result	Sampled Soil Gas	Result	Sampled Soil Gas	Result	Sampled Soil Gas	Result
Soil Source	No		No		No		No	
Groundwater Source	No		No		No		No	

Initial Receptor Evaluation		
Ingestion-Actual	Water supply well survey within 1,000 ft? Yes	
	Drinking water wells within 1,000 ft? No	
	Non-drinking water wells within 1,000 ft? No	
Ingestion-Potential	Protected groundwater source? No	Maximum K: 0.2347 (0.2347) m/d
	Institutional control within 1,000 feet? Yes	Minimum TDS: () mg/L
Vapors	Explosive vapor levels within 500 ft? No	
	Institutional control within 500 feet? GW Sources: No Soil Sources: No	
Plastic water lines	Shallowest depth to groundwater? 5.12 (5.12) feet	
	Plastic water line within 200 feet of source? Yes	
Surface water	Designated use segment within 500 feet? No	Designation(s):
	Any surface water within 200 feet? No	Pass visual inspection? N/A

example

Tier 2 Soil Analytical Data (mg/kg), V-3.00, 9LTP73													
Boring/ Well #	Date Sampled	Elevations(ASL)			Group 1				Group 2		Naph.	TPH	
		Ground	Sample	SWL	B	T	E	X	TEH-D	TEH-WO			
PMW1	08/14/2012	972.56	966.56	966.6	<0.31	<0.31	<0.31	<0.93	743.	<170.	N	139	
PMW2	08/14/2012	972.46	965.46	965.9	<0.28	<0.28	<0.28	<0.85	238.	<78.	N	54.20	
PMW3	08/15/2012	972.53	966.53	966.73	<0.28	0.233	0.556	1.64	1,790.	<400.	N	323	
PMW4	10/25/2012	972.53	965.53	965.5	0.0853	<0.21	0.592	1.11	2,860.	<780.	N	N	
PMW5	10/25/2012	972.32	965.32	967.2	<0.18	<0.18	<0.18	<0.54	180.	<40.	N	N	
PMW6	10/25/2012	972.77	964.77	966.81	<0.0034	<0.0034	<0.0034	<0.01	12.8	<7.9	N	N	
PMW7	04/01/2013	972.44	964.44	965.57	<0.097	<0.097	<0.097	<0.195	3,280.	<5.	N	N	
PMW8	04/01/2013	971.8	964.8	966.22	<0.03	<0.03	<0.03	<0.06	177.	<5.	N	N	
PMW9	04/01/2013	971.96	962.96	966.6	<0.005	<0.005	<0.005	<0.01	23.	<5.	N	N	
PMW10	04/01/2013	972.44	964.44	965.39	<0.03	<0.03	0.056	0.075	1,300.	<5.	N	N	
TEST	10/21/2015	972.	10.	966.	1.	1.	1.	1.	6,770.	1.	N	N	

Soil Plume Contours: TEH-D(mg/kg)

V-3.00, 9LTP73

example

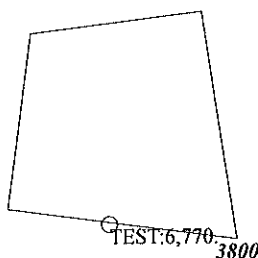
10500 (mg/kg) greater than maximum interpolated value.

PMW10:1,300.

PMW4:2,860.

PMW3:1,790.

PMW2:238.



PMW1:743.

1 inch = 170 feet



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

June 19, 2013

JOEY CUPP
PILOT TRAVEL CENTERS LLC
5508 LONAS DR
KNOXVILLE TN 37909

SUBJECT: No Action Required Classification – Pilot Travel Center #373, 11957
Douglas Avenue, Urbandale, Iowa
Registration No. 198606077

LUST No. 9LTP73

Dear Mr. Cupp:

The Department of Natural Resources (DNR) received the Tier 2 Site Cleanup Report (SCR) for the referenced site June 4, 2013. Thank you for the submittal. We have performed a completeness review of the report as described in Subrule 567-135.10(11) of the Iowa Administrative Code. We are accepting the Tier 2 SCR and are relying on Ray Widder, Iowa Certified Groundwater Professional (CGWP) number 1624 for accuracy and compliance with the DNR's rules and guidance.

Your CGWP has recommended the site be classification no action required because either the data do not exceed the applicable Tier 1 and Tier 2 target levels or the pathways by which a chemical of concern may reach an actual or potential receptor are incomplete. Upon review of the report and file information, the DNR is accepting the recommendation and is assigning the site a "No Action Required" classification. We will update our records to show the change in status.

FREE PRODUCT

A request for a no further action certificate cannot be made until free product recovery and inspection, as described in Subrule 567 – 135.7(5) of the Iowa Administrative Code, are complete for the site.

The DNR must be informed of any changes in ownership or responsible party. You are also required to inform us immediately of any changes at the site (i.e., appearance of free product, water well installation, construction, development, etc.) which could affect site risk classification.

Thank you for your cooperation with this site. If you have any questions or if we may be of further assistance please feel free to contact me at Lee.Osborn@dnr.iowa.gov or by phone at 515-281-8135. In all correspondence regarding this project, please include the LUST number, which is indicated in the subject heading of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee Osborn". The signature is fluid and cursive, with the first name "Lee" and last name "Osborn" clearly distinguishable.

LEE OSBORN
ENVIRONMENTAL SPECIALIST
UNDERGROUND STORAGE TANK SECTION

c: Field Office 5
PMMIC
Ray Widder, Pangean-CMD Associates, Inc., PO Box 845, Johnston, IA 50131

Osborn, Lee [DNR]

From: Collins, Tom [DNR]
Sent: Wednesday, February 06, 2013 2:11 PM
To: Osborn, Lee [DNR]
Subject: FW: UST# 8606077, Pilot #373. Urbandale, IA

9LTP73

From: Max Burmeister [<mailto:mburmeister@pangean-cmd.com>]
Sent: Wednesday, February 06, 2013 2:04 PM
To: Collins, Tom [DNR]
Cc: Chip Hughes; Geode Environmental
Subject: UST# 8606077, Pilot #373. Urbandale, IA

Good Afternoon Tom,

We have an unusual operating condition at the referenced facility. Pilot called out service techs because dispenser #25 appeared to be dispensing air. The line between the main dispenser and the satellite has fail to hold pressure during two air tests. They are now performing a precision test to try to isolate the issue. No fuel leaks have been observed. I will send you another update as soon as we have more information or confirm exactly what is going on with the system. Please let me know if you have any questions.

Thanks,

Max Burmeister
Pangean-CMD Associates, Inc.
9874 Main Street Suite 100
Woodstock, GA 30188
Office: (770) 926-8883 ext. 126
Cell: (770) 355-5094



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

August 21, 2012

CERTIFIED MAIL

JOEY CUPP
PILOT TRAVEL CENTERS LLC
5508 LONAS DR
KNOXVILLE TN 37909

91 7199 9991 7031 0885 6301

SUBJECT: Petroleum Free Product Recovery - Pilot Travel Center, 11957 Douglas Avenue,
Urbandale, Iowa
Registration No. 198606077

LUST No. 9LTP73

Dear Mr. Cupp:

We were recently informed by Ray Widder, Iowa Certified Groundwater Professional Number 1624, that free product has been discovered at the referenced site.

The DNR is requiring free phase product recovery begin immediately. Due to the occurrence of free phase petroleum we are requiring that a Tier 2 Site Cleanup Report (SCR), rather than a Tier 1 Report, be submitted by **October 30, 2012**.

The DNR is requiring free phase product recovery by bailing or installation of passive skimming equipment begins immediately. The frequency of bailing or maintenance of the skimming equipment must be based on the recharge rate of the product. The authority to require the removal activity is contained in Subrule 567--135.7(5) of the Iowa Administrative Code. Select a certified groundwater professional (CGWP) to perform or supervise free product recovery and to prepare the following reports (Subrule 567-134).

Within 45 calendar days of receipt of this letter, submit a Free Product Recovery Assessment Report that provides at least the following information:

1. The name of the CGWP responsible for implementing the free product removal measures.
2. The estimated quantity, type and thickness of the free product present in the monitoring wells, borehole and excavations, the recharge rate in all affected monitoring wells and a detailed description of the procedures used to determine the recharge rate.
3. A detailed justification for the free product removal technology proposed for the site. Base the justification narrative on professional judgment considering the characteristics of the free product plume (i.e., estimated volume, type of product, thickness, extent), an assessment of cost effectiveness based on recharge rates compared to alternative methods, site hydrology and geology, when the release event occurred, pilot or pump testing conducted to verify design assumptions and the potential for petroleum vapors or explosive conditions to occur in enclosed spaces. Proposals for removal systems other than hand bailing or passive skimming systems must be completed and submitted in a format consistent with the DNR's Corrective Action Design Report.
4. A schematic and narrative description of the free product recovery system used.

5. Whether any discharge will take place on-site during recovery operations and where this discharge will be located.
6. A schematic and narrative description of the treatment system, and effluent quality expected from any discharge.
7. The steps that have been or are being taken to obtain necessary permits/approvals for any discharge. No discharges of treated material shall occur until the treatment process is approved by the DNR.
8. Disposition of the recovered free product.
9. Free product plume definition and map. The extent of free product in groundwater must be assessed. The number and location of wells and separation distance between the wells used to define the free product plume must be based on the receptors present and the site hydrology and geology. A minimum of five monitoring wells are required to construct the plume map.
10. The estimated volume of free product present, how the volume was calculated, recoverable volume and estimated recovery time.

Free Product Recovery Reports must be submitted to the DNR monthly on DNR forms 542-1424 and 542-1425. The reports must be received by the DNR within 15 days following the reporting month. The signed Free Product Recovery Report cover sheet must also be included.

Thank you for your cooperation with this site. If you have any questions or if we may be of further assistance please feel free to contact me at Lee.Osborn@dnr.iowa.gov or by phone at 515-281-8135. In all correspondence regarding this project, please include the LUST number, which is indicated in the subject heading of this letter.

Sincerely,



LEE OSBORN
ENVIRONMENTAL SPECIALIST
UNDERGROUND STORAGE TANK SECTION

c: Field Office 5
PMMIC
Ray Widder, Pangean-CMD Associates, PO Box 845, Johnston, IA 50131



Date Produced: 08/27/2012

STATE OF IOWA

The following is the delivery information for Certified Mail™ item number 7199 9991 7031 0885 6301. Our records indicate that this item was delivered on 08/24/2012 at 01:21 p.m. in KNOXVILLE, TN, 37909. The scanned image of the recipient information is provided below.

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Address of Recipient:

5008 Lonesome Lane

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,

United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: 2895861 21641170

Osborn, Lee [DNR]

From: Geode Environmental [geode-enviro@mchsi.com]
Sent: Monday, August 20, 2012 11:15 AM
To: Osborn, Lee [DNR]
Cc: 'Tom J. Norris'; 'Chip Hughes'; 'Max Burmeister'
Subject: Pilot #373 Urbandale LUST #9LTP73/Reg#8606077

Lee,

As a follow up to our phone conversation, the following conditions were found: 0.02' of free product was found in PMW3 during initial monitoring at 10 am today. The well was completed on 8/15/02. The well is located NW of suspected release point dispenser 17. Two additional monitoring wells were gauged and did not indicate product. The three wells are the only wells present at this time.

A plastic water main is located to the north of this area. Given the distance and limited thickness of product, no immediate concerns are present. Previous investigations of the site indicate limited receptors. Further product plume definition should be completed on the north side of the diesel canopy.

Sincerely,
Pangean-CMD Associates, Inc.
Ray Widder

PO Box 845
Johnston, IA 50131
Ph: 515-309-2183
Cell: 515-975-9026
Fax: 515-309-1914

Osborn, Lee [DNR]

From: Osborn, Lee [DNR]
Sent: Thursday, May 10, 2012 1:46 PM
To: 'Geode Environmental'
Cc: 'Max Burmeister'; 'Tom J. Norris'; Schrunck, Verne [DNR]; Collins, Tom [DNR]; Douskey, Elaine [DNR]
Subject: RE: Pilot #373, 9LTP73

Ray,

Ensure an accurate and complete Tier 1/Tier 2 is provided. The approach described appears to be consistent with DNR rules and guidance.

Agreed, there have been previous investigations performed in the vicinity. However, referencing information included in a previous report or submittal for another LUST situation will not be acceptable; provide a complete report that can stand alone.

For K testing-using data and results from previous investigations will be considered, along with a CGWPs adequate justification the results are representative. If previous K data and results are to be considered, they must be included in the report submittal for this LUST site, diagrams provided, field data provided, and testing locations depicted on a site plan map.

Regarding plastic water lines, one needs to clarify the type of plastic. A complete water line evaluation is required.

Lee E. Osborn

IOWA DEPARTMENT OF NATURAL RESOURCES / 502 EAST 9TH STREET / DES MOINES, IOWA 50319-0034
EMAIL LEE.OSBORN@DNR.IOWA.GOV PHONE 515-281-8135 WEBSITE WWW.IOWADNR.GOV/UST

From: Geode Environmental [<mailto:geode-enviro@mchsi.com>]
Sent: Thursday, May 10, 2012 12:04 PM
To: Osborn, Lee [DNR]
Cc: 'Max Burmeister'; 'Tom J. Norris'
Subject: Pilot #373, 9LTP73

Lee,

The information below the bar is what was reported for the release at the above referenced facility. Given that this is a localized event, am I correct in assuming that Tier 1 approach may be initially limited to the following:

- Soil and water sampling as close to the source (dispenser 17) as feasible.
- Down gradient soil and water
- cross gradient soil and water for triangulation
- Tier 1 document to follow if applicable (not above water lines limits). Additional Tier 2 definition and reporting as needed.

Does this sound appropriate?

The site has been investigated under two previous LUST #'s, most recently 9LTN28. A summary of findings during that investigation:

- Known plastic water lines are located west and north of the diesel dispensers. West is general flow direction (downgradient) and the cross gradient location could be positioned in the direction of the north line. Also a cast iron (assumed rubber gasket) at the maintenance building.
 - No drinking or non-drinking water wells, not a PGWS
 - Surface water not a factor.
-

-Diesel release, vapors most likely not a factor. No basements, maintenance building (Wing Foot) would be nearest sanitary.

May we avoid further K testing given the 5 past tests performed over the previous two investigations?

Thanks

Ray Widder

Pangean-CMD Associates

Yesterday evening around 6:45 pm, the Class B Operator identified a leaking flex line beneath the shear valve at pump number 17. The pump is shut down and crews are working on the repairs. An estimate on the amount of fuel released has not yet been determined; however, this site does not have under dispenser containment. We are awaiting additional details from the site. Please let me know if you have any questions. Ray will be handling any required investigatory work at this site for Pangean; however, he is out of the office for the next couple of days. Please give me a call back when you get a chance.



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
ROGER L. LANDE, DIRECTOR

April 19, 2012

CERTIFIED MAIL

Joey Cupp
Pilot Travel Centers, LLC
5508 Lonas Drive
Knoxville, TN 37909

91 7108 2133 3938 8999 9392

SUBJECT: Petroleum Contamination – Pilot Travel Center, 11957 Douglas Avenue,
Urbandale, Iowa
Registration No. 198606077

LUST No. 9LTP73

Dear Mr. Cupp:

The Department of Natural Resources (DNR) was informed April 17, 2012, of petroleum contamination at the referenced facility. As a result of the contamination, the DNR under Subrule 135.9 of the Iowa Administrative Code (IAC) is requiring that you take the following actions:

1. **Within 30 calendar days** after receipt of this letter, submit in writing the name of the certified groundwater professional (CGWP) you have retained for this project and your intent to follow the schedule contained in this letter. We strongly suggest selecting a CGWP who can commit to the schedule for report submittal.
2. **Within 90 calendar days** after receipt of this letter, submit the Tier 1 Report. Guidance for the report has been provided to CGWPs. Incomplete Tier 1 Reports and Tier 1 Reports not submitted in the format required by the guidance will be rejected. Contact the department (515-281-6010) if you want a copy of the guidance documents.

Please be aware that Chapter 134 of the IAC requires a person who provides subsurface soil contamination and groundwater consulting services or who contracts to perform or supervise remediation or corrective action services at leaking underground storage tank sites be a CGWP. Ensure that the consultant and/or contractor you select is certified as a groundwater professional by the department. A list of CGWPs is attached.

If you are unable to meet the Tier 1 Report submittal schedule, notify the department in writing as quickly as possible. Provide a detailed reason for the delay and a firm date by which the report will be submitted.

If you elect to prepare a Tier 2 Site Cleanup Report (SCR) instead of a Tier 1 Report, the department must be notified in writing prior to the expiration of the Tier 1 Report submittal deadline. The Tier 2 SCR must be submitted within 180 calendar days after receipt of this letter. Your groundwater professional can assist you in determining whether a Tier 2 assessment is necessary.

Pursuant to Iowa Code 455B.474(1) "e", a site cleanup report (Tier 1 or Tier 2), proposed site classification, and/or corrective action design report must be accepted by the Department within 90 days of receipt, unless the Department identifies inaccurate or incomplete material information in the report such that a risk classification for the site cannot be determined.

Thank you for your cooperation with this site. If you have any questions or if we may be of further assistance please feel free to contact me at Lee.Osborn@dnr.iowa.gov or by phone at 515-281-8135. In all correspondence regarding this project, please include the LUST number, which is indicated in the subject heading of this letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lee Osborn".

LEE OSBORN
ENVIRONMENTAL SPECIALIST
UNDERGROUND STORAGE TANK SECTION

Attachments: Certified Groundwater Professional List

c: Field Office 5
PMMIC
Ray Widder, Pangean-CMD Associates, Inc., PO Box 845, Johnston, IA 50131



Date: 04/24/2012

COLLEEN ZELIADT:

The following is in response to your 04/24/2012 request for delivery information on your Certified Mail(TM) item number 7108 2133 3938 8999 9392. The delivery record shows that this item was delivered on 04/23/2012 at 10:56 AM in KNOXVILLE, TN 37909. The scanned image of the recipient information is provided below.

Signature of Recipient:

Delivery Section
Signature
Leah Huahett
Address
Leah Huahett

Address of Recipient:

Delivery Section
Address
5508 Conns Dr

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

Iowa Department of Natural Resources
PRELIMINARY LUST REPORT

LUST #: 9LTP73

Registration # 8606077

Start Date: 4-18-12
(Date LUST # was entered
on the computer)

LUST RECORDER / REPORTER

RECORDED BY:		SUSPECTED RELEASE REPORTED BY:	
Name: <u>Collins</u>		Reporter Name: <u>Max Burmeister</u>	
Location: <u>Field Office</u>		Business: <u>Pangean-CMD Associates, Inc.</u>	
<input type="checkbox"/> LUST Date: <u>4/18/2012</u>		Address: <u>9874 Main Street Suite 100</u>	
<input checked="" type="checkbox"/> UST		City: <u>Woodstock</u>	
<input type="checkbox"/> Other		State: <u>GA</u> Zip: <u>30188</u>	
TANK LOCATION:		Telephone: <u>: (770) 926-8883 ext. 126</u>	
Site Name: <u>Pilot Travel Center 373</u>		Date Reported: <u>4.17.2012</u> Time: _____	
Address: <u>11957 Douglas Ave.</u>		Date Discovered: <u>4.16.2012</u> Time: _____	
Address2: _____		Date Occurred: <u>4.16.2012</u> Time: _____	
City: <u>Urbandale</u> Zip: <u>50322</u>			
LEAK CONTACT:		EMERGENCY RESPONSE:	
Name: <u>Joey Cupp</u>		Spill No.: _____	
Address: <u>Pilot Travel Centers LLC</u>		ER Date: _____	
Address2: <u>5508 Lonas Drive</u>		MEMO:	
City: <u>Knoxville</u>		<u>Chip Hughes</u>	
State: <u>TN</u> Zip: <u>37934</u>		<u>Pilot Travel Center</u>	
Telephone: <u>865.588.7488</u>		<u>11957 Douglas Avenue</u>	
		<u>Urbandale, IA 50322</u>	
DESCRIPTION:			
Lead: <input type="checkbox"/> LUST Trust Fund Staff: _____			
<input type="checkbox"/> Responsible Party			
<input type="checkbox"/> State Fund			
Coordinator: <u>VKS</u>			

FO #: 5 County #: 77 Field Office Contact Name: _____

LUST #: _____

LUST OWNER / RESPONSIBLE PARTY

RESPONSIBLE PARTY:	TANK OWNER INFORMATION:
Name: <u>Joey Cupp</u>	Name: <u>Ibid.</u>
Company: <u>Pilot Travel Centers, LLC</u>	Company: _____
Address: <u>5508 Lonas Drive</u>	Address: _____
Address2: _____	Address2: _____
City: <u>Knoxville</u>	City: _____
State: <u>TN</u> Zip: <u>37934</u>	State: _____ Zip: _____
Telephone: <u>865.588.7488</u>	Telephone: _____
Fax: _____	Fax: _____
PROPERTY OWNER:	Owner Type:
Name: <u>Ibid.</u>	<input checked="" type="checkbox"/> Private/Corporate <input type="checkbox"/> School
Address: _____	<input type="checkbox"/> County <input type="checkbox"/> Municipal
Address2: _____	<input type="checkbox"/> Federal <input type="checkbox"/> State
City: _____	<input type="checkbox"/> Indian Trust Lands <input type="checkbox"/> Unknown
State: _____ Zip: _____	
Telephone: _____	
MEMO:	TANK OPERATOR:
	Name: <u>Ibid.</u>
	Company: _____
	Address: _____
	Address2: _____
	City: _____
	State: _____ Zip: _____
	Telephone: _____

LUST #: _____

LUST INITIAL RELEASE CONDITIONS

LEAK DISCOVERED THROUGH:	RESOURCES:	Threatened:	Contaminated:
Discovered During: <input type="checkbox"/> Monitoring <input type="checkbox"/> Closure Sampling <input type="checkbox"/> Site Investigation <input checked="" type="checkbox"/> Other (see memo)	Soil <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Groundwater <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
# of Tanks Removed: _____	Actual - Drinking Water Well <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
# of Tanks Filled In Place: _____	Potential - Nondrinking Water Well <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Potential - Protected Groundwater <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Surface Water <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Toxic Vapors <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Explosive Vapors <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Other <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CAUSE OF RELEASE: (check all that apply)	PRODUCT:		
<input checked="" type="checkbox"/> Failure of flex connector	Gasoline <input type="checkbox"/> Diesel <input checked="" type="checkbox"/>		
<input type="checkbox"/> Fuel deposit in groundwater monitoring well	Waste Oil <input type="checkbox"/> Kerosene <input type="checkbox"/>		
<input type="checkbox"/> Line corrosion	Fuel Oil <input type="checkbox"/> Hydraulic Oil <input type="checkbox"/>		
<input type="checkbox"/> Line joint corrosion failure	Other Petroleum <input type="checkbox"/> Unknown <input type="checkbox"/>		
<input type="checkbox"/> Puncture of line during construction	Non-Petroleum Chemical (see memo) <input type="checkbox"/>		
<input type="checkbox"/> Spill	OFFICIALS ON SITE:		
<input type="checkbox"/> Stress crack in line	Health <input type="checkbox"/> Law Enforcement <input type="checkbox"/> Fire <input type="checkbox"/>		
<input type="checkbox"/> Stress crack in tank	None <input type="checkbox"/> Unknown <input checked="" type="checkbox"/> Other (see memo) <input type="checkbox"/>		
<input type="checkbox"/> Tank corrosion (perforations) bare steel tank	NON-REGULATED TANKS:		
<input type="checkbox"/> Tank corrosion Strip tank	AST <input type="checkbox"/> UST <input type="checkbox"/>		
<input type="checkbox"/> Tank overfill	INITIAL LEAK STATUS:		
<input type="checkbox"/> Other (see memo)	<input type="checkbox"/> Continuing <input checked="" type="checkbox"/> Stopped <input type="checkbox"/> Unknown		
<input type="checkbox"/> Unknown			
Quantity Released: _____ gallons			

LUST COST ADMINISTRATION

Tank Owner Identified:	Responsible Party Found:	Responsible Party Found Date:	Tank Owner Broke:
<input type="checkbox"/> Yes	<input type="checkbox"/> Yes		<input type="checkbox"/> Yes
<input type="checkbox"/> No	<input type="checkbox"/> No		<input type="checkbox"/> No
<input type="checkbox"/> Unknown	<input type="checkbox"/> Unknown		<input type="checkbox"/> Unknown

MEMO: Release discovered 4.16.2012 around 6:45 P.M. The Class B Operator identified a leaking flex line beneath the shear valve at diesel dispenser 17. Dispenser is shut down and crews were working on the repairs. An estimate on the amount of fuel released has not yet been determined. No UDC present. Ray Widder will be handling investigatory work at this site for Pangean.

Collins, Tom [DNR]

From: Max Burmeister [mburmeister@pangean-cmd.com]
Sent: Wednesday, April 18, 2012 8:02 AM
To: Collins, Tom [DNR]
Cc: Geode Environmental; Chip Hughes
Subject: RE: Pilot Travel Center #373 - UST Reg #8606077

Sorry Tom, Its diesel.

Thanks,

Max

From: Collins, Tom [DNR] [<mailto:Tom.Collins@dnr.iowa.gov>]
Sent: Wednesday, April 18, 2012 9:01 AM
To: Max Burmeister
Cc: Geode Environmental; Chip Hughes
Subject: RE: Pilot Travel Center #373 - UST Reg #8606077

By the way, is this gasoline or diesel?

From: Collins, Tom [DNR]
Sent: Wednesday, April 18, 2012 7:56 AM
To: 'Max Burmeister'
Cc: Geode Environmental; Chip Hughes
Subject: RE: Pilot Travel Center #373 - UST Reg #8606077

Max: site will be assigned new LUST ID, and required to do a Tier 1. In the meantime, please provide a site map with the location of the source (dispenser), and documentation of repairs. Work done beneath the shear valve will require secondary containment, i.e., UDC.

Thanks. Tom

From: Max Burmeister [<mailto:mburmeister@pangean-cmd.com>]
Sent: Tuesday, April 17, 2012 11:58 AM
To: Collins, Tom [DNR]
Cc: Geode Environmental; Chip Hughes
Subject: Pilot Travel Center #373 - UST Reg #8606077
Importance: High

Tom,

I left a voice mail for your regarding a release at the above referenced facility. The information we currently have is below.

Yesterday evening around 6:45 pm, the Class B Operator identified a leaking flex line beneath the shear valve at pump number 17. The pump is shut down and crews are working on the repairs. An estimate on the amount of fuel released has not yet been determined; however, this site does not have under dispenser containment. We are awaiting additional details from the site. Please let me know if you have any questions. Ray will be handling any required investigatory work at this site for Pangean; however, he is out of the office for the next couple of days. Please give me a call back when you get a chance.

Thanks,

Max Burmeister
Pangean-CMD Associates, Inc.
9874 Main Street Suite 100
Woodstock, GA 30188
Office: (770) 926-8883 ext. 126
Cell: (770) 355-5094