



December 4, 2020

Steve Sampson Brown
City of Dubuque
50 W. 13th Street
Dubuque, IA 52002

RE: Request for comfort letter regarding environmental conditions for planned Comiskey Park Expansion in Dubuque, Iowa

Dear Mr. Brown,

The Iowa DNR has received a request from the City of Dubuque via Emily Smart at Blackstone Environmental, to provide a comfort letter to the city regarding the recreational expansion and redevelopment of Comiskey Park. That plan would include seven former residential lots located west of and formerly owned by the Morrison Brothers Company. These lots are also identified (in the 2016 HR Green report) as parcels MBR1, MBR2, MBR3, MBR4, MBR5, MBR6 and MBR7.

The Iowa DNR has reviewed the available groundwater monitoring data provided by Seneca Environmental (2018-2020) for the Morrison Brothers site that includes monitoring wells MW-6, 7 and 8 located on lots now owned by the city, as well as the shallow (Range 1) and deeper (Range 2) soil data and groundwater data provided by HR Green in 2016 for the seven city owned lots referenced above. The following review comments on those data are provided below.

Review of Soil Conditions:

Review of the HR Green soil data indicates isolated detection of lead and benzo(a) pyrene (a polycyclic aromatic hydrocarbon) on lots MBR-6 and MBR-7 in shallow (Range 1) soil from 0-2 feet that exceed the Statewide Standards (SWS) for these compounds. These exceedances can be addressed by the City through excavation of contaminated soil and confirmation sampling to demonstrate clean conditions.

Volatile organic compounds (VOCs) and diesel fuel were also detected in soil at levels below SWS on lots MBR-2, 3, 4, 5 and 6 in the deeper Range 2 soil samples from 8-12 feet. However, these detections in deep soil do not pose an exposure concern with recreational use but could pose an exposure risk to deep excavations associated with installing buried utility or future construction projects.

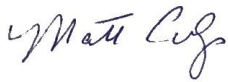
Review of Groundwater Conditions:

Review of the Seneca groundwater data indicates no impairment of groundwater in monitoring wells #6, 7 or 8 located on city property. Review of HR Green data for groundwater indicates detections of diesel fuel above SWS on lots MBR-3, 4, and 6 and the detection of a volatile organic compound methylnaphthalene above SWS on lots MBR3 and 4. The detections in groundwater generally do not pose an exposure risk with recreational use but may be addressed through prohibition of the use of groundwater through existing city ordinance(s) and/or an environmental covenant on the entire Comiskey Park development.

This letter is an evaluation of existing conditions and outlines risks and response options for the city to consider in redeveloping these lots for intended recreational use. This letter should not be considered an endorsement by the Iowa DNR as to the appropriate use of the property, or that the site is considered contaminant free. If such an endorsement is sought, the property may consider enrolling the site in the Iowa DNR Iowa Land Recycling Program (LRP), which would involve more in depth site investigation and assessment of risks associated with possible uses of the property.

Please contact me at 1-515-725-8337 if you have any questions.

Regards

A handwritten signature in dark ink, appearing to read "Matt Culp". The signature is fluid and cursive, with the first name "Matt" and last name "Culp" clearly distinguishable.

Matt Culp
Senior Environmental Specialist
IDNR – Contaminated Sites Section

CC:

- Mike Sullivan, Section Supervisor Solid Waste and Contaminated Sites Section, Iowa DNR
- Emily Smart, Blackstone Environmental, 22 Fairview Knoll NE Iowa City, IA 52240
- Marie L. Ware, Leisure Services Manager City of Dubuque 2200 Bunker Hill Road Dubuque, IA 52001
- Abbie Moilien, Saiki Design 1110 S. Park Street Madison, Wisconsin 53715
- Charles Glab, (Morrison Brothers) 570 East 7th Street, Dubuque IA, 52001