



November 3, 2023

DEREK P SCHMIDT COO/CFO
FLEXSTEEL INDUSTRIES INC
385 BELL ST
DUBUQUE IA 52001

**Re: Land Recycling Program - Flexsteel Industries, (3400 Jackson St, Dubuque, IA 52001)
Contaminated Sites Database Site ID No. 1698
Review of Soil Excavation Report**

Dear Mr. Schmidt:

This letter is in response to the submittal of the Soil Excavation Report submitted October 4, 2023 outlining excavation efforts conducted on the property located at 3400 Jackson St, Dubuque, IA. This site has been part of the Land Recycling Program (LRP) since 2020. Flexsteel vacated the site in 2019 and all but two buildings have demolished. The Site Assessment was accepted in December 28, 2020 ([Doc #37644](#)). A Groundwater Sampling Plan was submitted and accepted in 2021 ([Doc #38827](#)). The Risk Evaluation/ Response Action (RE/RA) was received and approved in February 2023 ([Doc #40792](#)). The RE/RA report outlined a plan to address risk at the site that included additional groundwater sampling, soil excavation and/or capping and an Environmental Covenant (EC) to restrict site use. Both the Groundwater Monitoring Report and the Soil Excavation Workplan were accepted in August 2023 ([Doc #40824](#)). Groundwater monitoring has ceased. The excavation report outlines a remedial action that occurred in August 2023 and targeted the Heating Oil and Lacquer Spraying Area in order to address unacceptable lead concentrations in soil.

The excavation was conducted to remove lead-contaminated soil that posed an unacceptable risk for Site Workers (in the top two feet of the profile). Confirmation sampling showed no exceedances of the non-residential lead standard of 1,100 mg/kg. Submission of a draft EC is expected to be the next step towards closure. Likely elements of a draft EC for this site will include (but are not limited to) prohibiting residential use, prohibiting groundwater access, use of a soil management plan if soil disturbance is necessary, cap installation and maintenance over areas with remaining soil contamination, and future structures incorporating vapor barriers.

It is the understanding of the DNR that Buildings 41 and 42 are planned to be demolished. Please notify the DNR when these buildings are removed. If they remain onsite and are in areas of VOC contamination, additional investigation may be required to ensure vapor intrusion has been properly evaluated.

Please submit a draft EC within 45 days. Once the EC is approved by the DNR, a public comment period will be announced in the local paper. Any comments received will be addressed. A final report will be required that will include elements listed in [567 IAC 137.10\(8\)](#) and the final recorded version of the EC. Once reviewed and approved, a No Further Action (NFA) certification can be considered for the site.

Please contact me if there are any questions at [\(515\) 669-5494](tel:515-669-5494) or by email at shelly.nellesen@dnr.iowa.gov.

Sincerely,

Shelly Nellesen
Environmental Specialist Senior
Land Quality Bureau

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