February 11, 2026

BRIAN SCHMIDT
CITY OF BETTENDORF PUBLIC WORKS
4403 DEVIL'S GLEN ROAD
BETTENDORF IA 52722

Re: Devil's Glen Park (4403 Devil's Glen Road, Bettendorf, IA 52722)
Contaminated Sites Database Site ID No. 2879
Discovery of Free Product

Mr. Schmidt:

The Iowa Department of Natural Resources (DNR) received notification on October 15, 2025 that free product was observed in multiple monitoring and remediation wells at the above referenced site during well closure activities. Monitoring wells MW2A (2.28') and MW16 (2.40') along with remediation wells ISOC 1 (8.01') and ISOC 2 (7.61') were discovered to contain free product of unknown composition but believed to be diesel fuel. The site received a Leaking Underground Storage Tank (LUST) No Further Action classification in June of 2025 (LUST# 8LTB06). It decided that additional free product assessment and monitoring would be handled under the Solid Waste and Contaminated Sites Section if the product was determined to be diesel fuel due to the presence of diesel above ground storage tanks onsite. Forensic analysis utilizing gas chromatography completed in December 2025 confirmed the product was a middle distillate such as diesel fuel.

Where free product is encountered, recovery must be initiated by bailing or installation of passive skimming equipment. 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.

Free product recovery must be completed monthly, and reports must be submitted to the department quarterly on DNR forms 542-1424. The reports must be received by the department within 15 days following the reporting month. The signed free product report cover sheet must also be included. Please send copies of the Free Product Recovery Assessment Report and quarterly recovery reports electronically to my email listed below. The first quarterly free product recovery report is due by **April 15, 2026**.

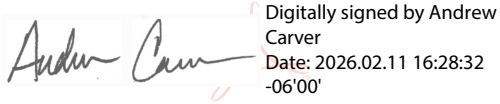
Additionally, by **April 15, 2026**, submit a **Free Product Recovery Assessment Report** that provides the following information:

1. The name of the certified groundwater professional 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 on a format consistent with the department'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 the recovery operation and where this discharge will be located (if applicable);
6. A schematic and narrative description of the treatment system, and effluent quality expected from any discharge (if applicable);
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 department (if applicable);
8. Disposition of the recovered free product;
9. Free product plume definition and map. Show all wells/borings checked for free product, indicate whether or not free product was observed, and note the thickness of free phase product observed. The map must also show the location of the present or former UST system (tanks, dispensers, and product lines) and other pertinent site features. The extent of free product in the subsurface must be assessed. The number, location, and separation distance of wells used to define the free product plume must be based on receptors present and site hydrology/geology. A minimum of five monitoring wells are required to construct the plume map; and
10. The estimated volume of free product present, how the volume was calculated, recoverable volume and estimated recovery time.

Please contact me with any questions at (515) 721-7024 or by email at andrew.carver@dnr.iowa.gov.

Sincerely,



Andrew Carver, CGP
Environmental Specialist
Land Quality Bureau

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