

August 7, 2025

BEN WORRELL  
CITY OF CEDAR RAPIDS  
500 15TH AVE SW  
CEDAR RAPIDS IA 52404

**Re: Cedar Lake South Forebay Site Investigation Work Plan  
Cedar Lake Complex, Cedar Rapids, Iowa**

Dear Mr. Worrell:

The Iowa Department of Natural Resources, Solid Waste and Contaminated Sites Section (DNR) received a document titled "Cedar Lake South Forebay Site Investigation Work Plan" on July 29, 2025. Terracon Consultants Inc. has prepared and submitted the workplan on behalf of the City of Cedar Rapids in preparation for a water quality improvement project at the Cedar Lake Complex.

Several known contaminated sites are located in the immediate vicinity of the Cedar Lake Complex, and the review of the present report takes into cumulative account this fact, and the various types of contamination known to exist. As with previous workplans submitted for work involving soil excavation or movement in the area, DNR reiterates that lake sediment does not have specific chemical standards in the manner that water and soil do. Disposal of offsite movement of sediment should be considered carefully, and previously approved methods for handling soil from the Cedar Lake area should be followed. Curtains should be used as necessary to prevent spreading contaminants found in lake sediments if they are disturbed to other areas of the lake.

The present workplan notes that a 10.6ev lamp will be used for field screenings, please be aware that 10.6ev is sufficient for VOCs and petrochemicals, but is not sufficient for screening soil for chlorinated solvents, PAHs, and other less volatile chemicals. An 11.7ev lamp is strongly preferred for sites where potential chemicals go beyond VOCs and petroleum (such as Cedar Lake).

Polyaromatic hydrocarbons (PAHs) are not listed among the chemicals in Section 5.0 "Laboratory Analytical Methods". PAH contamination has been a theme at Cedar Lake-related sites in the past, and should either be included in the suite of chemicals to be tested, or a reasoned explanation of why it is not included should be submitted with future anticipated reporting of findings.

Section 8.0 "Reporting" lists the documents that will be generated based on the present workplan sampling. Not included in this list is a report detailing the soil management plan that will be followed in order to safely handle soil/sediment at the site should removal commence with final disposal off-

site. Movement of soil/sediment off site should be pre-approved with a soil management plan *if* results of testing indicate that exceedances of an applicable standard are present.

If you have any questions, or if we may be of further assistance, please contact me at [matthew.graesch@dnr.iowa.gov](mailto:matthew.graesch@dnr.iowa.gov) or by phone at [\(515\)250-1923](tel:(515)250-1923).

Sincerely,

Matthew Graesch, P.G.  
Environmental Specialist Senior  
Land Quality Bureau

cc: Michael Sullivan  
Iowa DNR  
6200 Park Ave, Suite 200  
Des Moines, IA 50321  
[mike.sullivan@dnr.iowa.gov](mailto:mike.sullivan@dnr.iowa.gov)

DNR Field Office 1, Manchester  
[ted.petersen@dnr.iowa.gov](mailto:ted.petersen@dnr.iowa.gov)

Dan Green  
Terracon Consultants Inc.  
2640 12<sup>th</sup> St SW  
Cedar Rapids, IA 52404  
[Dan.Green@terracon.com](mailto:Dan.Green@terracon.com)