

STATE OF IOWA

THOMAS J. VILSACK, GOVERNOR SALLY J. PEDERSON, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES

JEFFREY R. VONK, DIRECTOR

CON 12-15 Doc # 7225

May 28, 2003

Mr. Mike Koch Public Works Director City of Dubuque 50 W. 13<sup>th</sup> Street Dubuque, IA 52001

Dear Mr. Koch,

This letter is to inform you that the IDNR Contaminated Sites section has reviewed the Phase I/Phase II Environmental Assessment for the US 20/University Avenue Extension Project located in Dubuque, Iowa. As we discussed in our telephone discussion on Tuesday, May 27, 2003 I also discussed the site with Nina Koger of the IDNR Solid Waste Section regarding the fate of solid waste that is evident in the Phase II report photos and that may be exhumed during excavation and grading.

The following review comments are provided.

- The IDNR has determined that the highway extension site will not be considered for further assessment under the CERCLA (super fund program) but will require further oversight under state authority. Although the cumulative risk to public health and environment from this site is low, additional assessment is required in the dump/fill area to determine the degree of contamination from that feature. Therefore, resampling of soil and (filtered) ground water for RCRA metals in the vicinity of monitoring wells #2 and #3 near the dump area will be required.
- A soil cap over contaminated soil is an acceptable remedy, however, caution is recommended during grading so that contaminated soil is not spread over a larger area.

- The responsibility for proper removal and disposal of demolition (building) waste or other solid waste on the surface or waste found during grading operations or exhumed during excavation to prepare the right-of-way should be resolved between the city and the current landowner prior to any site work.
- Since there is potential for a wide range of (buried) solid waste at this site (in the dump area) the Contaminated Sites Section recommends that IDNR (field office) staff be present to observe initial grading and excavation.

Please contact me at 1-515-242-5087 if you have any questions.

Sincerely

Matthew Culp

**IDNR** 

CC: Nina Koger, Solid Waste Section, IDNR

IDNR Field Office, Manchester, Iowa Cynthia, Quast, Howard R. Green