COMMUNITY RELATIONS PLAN

U.S. EPA Region 7 Brownfields Cleanup Grant
Blum East Site
501 East 15th Street
City of Dubuque, Iowa

Cooperative Agreement No. BF-97756201

JUNE 19, 2017

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APPENDICES

1.0 INTRODUCTION

The City of Dubuque (City) received a U.S. Environmental Protection Agency (EPA) Brownfields Cleanup Grant in 2016 to fund the cleanup of the East Blum site located at 501 East 15th Street in Dubuque, Iowa (site). The City entered into a cooperative agreement with the EPA to evaluate, design, and implement a permanent cleanup remedy for the contaminated soils at the site. Conducting the referenced activities will enable the City to 1) make a sound decision regarding the future use of the site and 2) meet the primary objective of the cleanup remedy. The work will ultimately help protect the environment and mitigate the risk of potential human exposure to the contaminated soils and groundwater.

Cleanup plans include redeveloping the 0.23-acre site into a natural outdoor green space including children's adventure play area, bike trail hub, channel overlook structure and family gathering space, and non-motorized boat ramp launch area.

The purpose of the Community Relations Plan (CRP) is to identify the communication strategies that will address the needs and concerns of the City's citizens. Adjacent property owners directly or potentially affected by the selected cleanup remedy are of particular concern. As such, the City will take special steps to involve these individuals and help them understand the project (see Section 4.2 of this Plan).

This CRP describes how the City has previously involved, and how it will continue to involve, the community, city officials, and local organizations in the decision-making process regarding the environmental remedy for the site. Active participants in the community are essential to the success of the CRP by providing points of contact for disseminating information and soliciting input in each step of the cleanup process.

2.0 BACKGROUND

2.1 What is a Brownfield?

A Brownfield is "real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant." Brownfields are typically former industrial or commercial properties where improper operations may have resulted in soil and/or groundwater contamination. A Brownfield often poses environmental, legal, and financial burdens on communities. The East Blum site satisfies the definition of a Brownfield site.

2.2 Site Description and Background

2.2.1 Site Location and Description

The site is generally located at 501 East 15th Street in the City of Dubuque, Iowa. The site is further located by the approximate latitude and longitude at 42.508918º North and 90.663100º West. Figure 1 within Appendix A is a copy of a Dubuque North USGS 7.5-minute topographic map showing the location of the site. The referenced map shows the site to be flat with an elevation of approximately 600-610 feet above mean sea level.

The East Blum property consists of the following three (3) parcels:

Table 1

Property #	Property Address	PIN	Acres
1	501 East 15th Street	1024284007	0.15
2	East 15th Street	1024284006	0.08

Figure 2 in Appendix A illustrates the site in relationship to the surrounding area.

2.2.2 Site History

The following table outlines previous uses according to available historical records.

Table 2

Date(s)	Source(s)	Property Use(s)
1884-1958	Historical city directories and Sanborn maps	Residential and commercial development • 1884: The western portion of the subject property is a two-story grocery store and saloon while the eastern portion of the subject property is vacant and has an outbuilding. • 1891 and 1909: the western portion of the subject property is a two-story grocery store and saloon while the eastern portion contains multiple two-story dwellings. • 1950: The western portion of the subject property is a two-story flat while the eastern portion contains multiple dwellings. City directories identified the subject property as 501-511 East 15th Street and listed it as multiple individuals in 1954 and 1958.
1963-present	Historical aerial photographs and city directories, Dubuque Assessor's Office website, and the site reconnaissance.	Industrial development Historical Sanborn maps display the following: • 1970: The subject property is depicted as "steel storage" with two two-story buildings and one one-story building. City directories identified the subject property as 501-509 East 15th Street and listed it as "Blum Co Storage" in 1963, 1968, 1973, 1978, 1983, and 1988; unlisted in 1992, 1995, 1999, 2003, 2008, and 2013. Observations made during the site reconnaissance identified an incinerator, staining on the ground and stored material, and hydraulic equipment on the subject property. The subject property currently operates as a scrap yard/recycling business.

No previous cleanup or remediation activities have taken place at the subject property.

2.2.3 Nature of Threat to Human Health and Environment

HR Green, Inc. (HR Green) conducted a Phase II Environmental Site Assessment (ESA) at the East Blum property in December 2015 under the City's Petroleum Assessment Grant. Five (5) borings were advanced on the site to collect soil and groundwater samples for analysis. HR Green compared the results against Iowa Statewide Soil and Groundwater Standards and calculated the cumulative health risks for the detected constituents. The following table summarizes the findings and conclusions:

Table 3

Contaminants Detected Greater than Iowa Statewide Standards		Property Suitable for Redevelopment Based on Preliminary Risk Evaluations?	
Soil	***Groundwater***	***Residential***	***Non-residential***
Benzo(a)pyrene/Arsenic/ Lead	Bis(2-ethylhexyl)phthalate/ Benzo(a)pyrene/Benzo(b)fluoranthene /Dibenz(a,h)anthracene/Indeno(1,2,3-cd)pyrene	No	No

There are twelve wells located within 1,000 feet of the site. These wells include five abandoned wells and one Safe Drinking Water Information System (SDWIS) well and two wells that are labeled as Iowa Geological Survey wells, public wells, and SDWIS wells (accounting for six of the twelve wells within 1,000 feet of the site). The five abandoned wells are not viable pathways of exposure due to their status. The two wells that account for six of the twelve wells have a permit status of inactive reported in the SDWIS database and as such do not appear to be a viable pathway of exposure. The remaining SDWIS well has a reported status of active in the SDWIS database however the reported depth of the well is zero feet and as such does not appear to be a viable exposure pathway.

While groundwater concentrations at the site previously exceeded Statewide Standards and calculated risk limits established by IDNR for redevelopment of the site for residential reuse, the City of Dubuque has an ordinance (Section No. 16-11-20) that prevents the installation of private wells unless public water is not available. This requires permit approval by the County's Health Department. Further, no wells may be installed within 500 feet of a Leaking Underground Storage Tank (LUST) site. This ordinance severs the groundwater ingestion pathway for new wells. However, groundwater concentrations at the site had previously exceeded Statewide Standards and calculated risk limits established by IDNR. The previously mentioned groundwater ordinance prevents exposure to concentrations observed. Further, vapor intrusion modeling was completed on the property to determine any exposure risk from soil vapor from groundwater concentrations observed. Results from this modeling effort identified little to no risk associated with vapor intrusion in to an enclosed space or structure.

The City has enrolled the site into the Iowa Land Recycling Program (LRP) in order to receive a No Further Action (NFA) certificate. The Iowa LRP specifies cumulative human health risk criteria that the project must comply with in order to acquire a NFA certificate. Cumulative risk is the summation of cancer and non-cancer risks, determined separately, and based on exposure to multiple contaminants from the same medium and exposure of the same individual to contaminants in multiple media. Evaluation of cumulative risk is conducted using the cumulative risk calculator on the IDNR Contaminated Sites Section website based on the end use of the site (e.g., residential, commercial, industrial, open space, etc.). The cumulative risk calculator assesses risk to potentially exposed parties based on three standard exposure scenarios from multiple contaminants and multiple media (i.e., groundwater, soil, and air).

3.0 CLEANUP PROCESS

The City has enrolled the site in the Iowa LRP to obtain a recordable NFA certificate and to meet the requirements of the EPA Brownfields Cleanup Grant and the Cooperative Agreement between the City and EPA. The LRP has a structured approach to evaluate health risk and to determine the appropriate remedy for implementation at the site. The results of each step of the LRP process, along with the proposed future land use, determine potential remedies for the site.

The goal of the Cleanup Grant and enrollment in the LRP is to further investigate the extent of the contamination, evaluate health risk based on future use, evaluate cleanup alternatives that reduce or eliminate the potential risk to human health and/or the environment, design a cleanup remedy that efficiently and effectively manages the soil and groundwater contamination, implement the appropriate remedy, and demonstrate the effectiveness of the remedy to comply with appropriate standards that will allow for the safe redevelopment of the site.

The proposed investigation requires a Data Quality Objections and Quality Assurance Project Plan (DQO/QAPP) be prepared to address contamination identified at the site and be submitted to EPA for approval. The DQO/QAPP will demonstrate compliance with applicable standards. It is the purpose of the Plan to provide a program of decision that provides data quantity and quality that is sufficiently balanced between the requirements of the EPA Grant and that required by Iowa Administrative Code (IAC) chapter 137 - *Iowa Land Recycling Program and Response Action Standards*.

IDNR requires full delineation of any identified contaminants at the site exceeding Statewide Standards so a limited amount of sampling on the property will be required as part of the LRP enrollment. Any additional sampling that is proposed will be included in the QAPP and the results of previous Phase II ESAs and any additional delineation sampling is presented in the LRP Site Assessment Report. IDNR will notify the adjacent impacted or potentially-impacted property owners of the results of the LRP Site Delineation Sampling.

Data generated from the previous Phase II ESA have been used to evaluate health risks and potential cleanup remedies. Potential corrective remedies are evaluated to determine the most efficient and effective method to manage the soil and groundwater contamination at the site with respect to proposed future land use. This information has been presented in the Analysis of Brownfields Cleanup Alternatives (ABCA) and is available for review as described in Section 5.2 below. The ABCA evaluated three options: 1) no action, 2) removal of structures and capping, and 3) removal of structures and excavation with off-site disposal. A fourth option has since been included: 4) removal of structures and excavation with encapsulation of contaminated soil in an on-site berm. The conclusion of the ABCA and the addition alternative option found that options 2 and 4 are the best options for this property based on effectiveness, ability to implement, impact on climate change, and cost.

The Risk Evaluation and Response Action (RE/RA) plan will detail the implementation of the ABCA-approved selected remedy. The Site Delineation Sampling and Phase II ESA results will be used to evaluate carcinogen and non-carcinogen risk potential as it relates to current and future land uses. The RE/RA will calculate health risks and then discuss

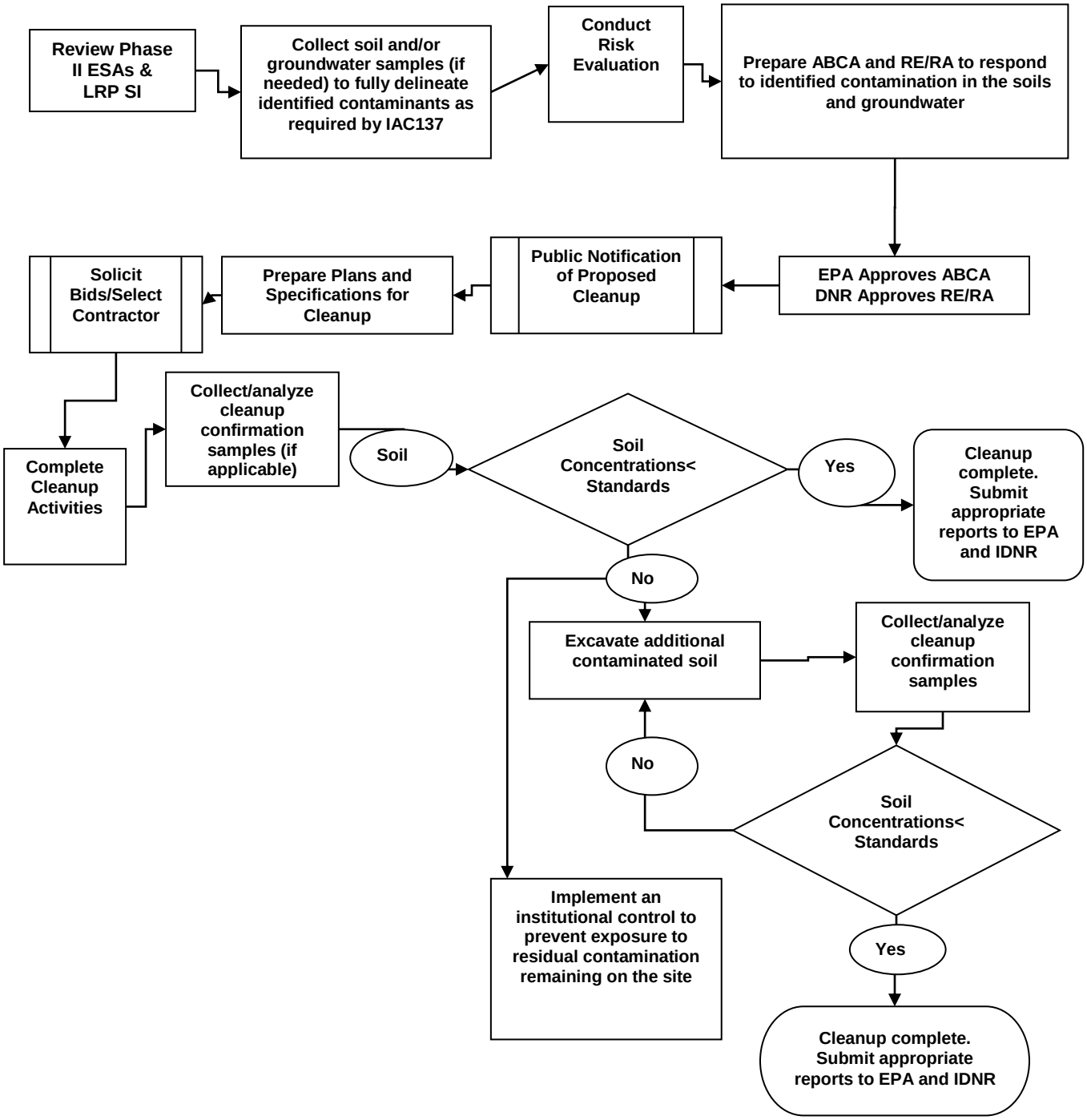
how the selected remedy will alleviate that potential risk of human exposure and impact to the environment to allow for redevelopment of the site while protecting the public and environment. The RE/RA will be submitted to IDNR for approval and to EPA for its records.

A public notification and comment period intended to inform the community of the findings and recommendation for the implementation of the corrective remedy begins after approval of the RERA. Upon addressing public comments, the RE/RA will be finalized and the Administrative Record will be updated and recorded.

At this point in the cleanup process, bid documents are prepared for the implementation of the response action remedy (cleanup). The City will solicit costs and qualifications to implement the response action (RA) remedy. Upon the City selecting a cleanup contractor, implementation of the RA will begin. Any contaminated soils found to require excavation and off-site disposal will be tested for hazardous waste potential and beneficial reuse potential to determine the appropriate disposition. At the completion of the RA, compliance samples are collected and analyzed to demonstrate the effectiveness of the RA. Compliance samples will be collected in accordance with the approved QAPP and the number of samples will be collected per the requirements of IAC 137. The results of the RA will be documented in the RA implementation report that is submitted to EPA and IDNR for review.

Upon achieving the compliance standards approved in the RE/RA and finalizing any institutional control documentation (environmental covenants, etc.), a Final Report is prepared documenting the entire LRP process. The Final Report is submitted to IDNR for approval and issuance of a NFA certificate. Figure 1 on the following page is a schematic flow chart of the EPA/IDNR cleanup process.

Figure 1 EPA Brownfields Cleanup Process



4.0 COMMUNITY INVOLVEMENT

4.1 Community Profile

Located on the banks of the Mississippi River, Dubuque is Iowa's oldest city. Dubuque was established as a fur-trading post and mining community, and later flourished as a manufacturing hub. Railroads connected Dubuque to metropolitan areas across the country in the mid-1800s. At the turn of the 20th Century, Dubuque's downtown millwork district was the backbone of the regional economy.

The city's proximity to a major commercial waterway made the area convenient for a variety of industrial uses, including shipbuilding and repair, railroads, bulk petroleum and coal storage operations, food processing, farm machinery production, and lead mining activity. Manufacturing reigned in Dubuque until the mid-1900s. As Dubuque's retail and industrial sectors moved to the western suburbs or fled completely, the downtown deteriorated and fell into disrepair. With the collapse of the farm economy in the 1980s, the community watched as the Dubuque Packing Company closed up shop, and then as John Deere – then the city's largest employer – reduced its workforce by three-quarters of its peak. At the time, Dubuque lost 10 percent of its population and had the highest unemployment in the nation.

Over the last 100 years, Dubuque has seen its economy shift from manufacturing along its riverbank to the retail, health care, education, publishing, and financial service sectors. Dubuque now serves as the employment center for the tri-state region of Iowa, Illinois and Wisconsin. Dubuque is currently underway on an ambitious effort to revitalize its downtown, including the Washington Neighborhood. The Washington Neighborhood is a 128-acre, low-income community containing the city's oldest housing stock. Economic disinvestment in the downtown and job flight to the suburbs significantly impacted the Washington Neighborhood. In 2004, the City launched a campaign to spur economic development and improve residents' quality of life in this distressed area. Restoration efforts include daylighting the buried Bee Branch Creek, creating a linear park and installing green infrastructure to reduce the risk of flood damage to 1,155 properties. In 2012, the City received EPA Community-Wide Brownfields Assessment funding to characterize properties in the Washington Neighborhood to encourage their reuse. In 2013, Dubuque was honored with an EPA National Award for Smart Growth Achievement for its focused Washington Neighborhood redevelopment activities.

The impacted Washington Neighborhood is currently host to multiple gas stations, body shops, dry cleaners, metal finishing companies, and fuel yards. Railroad tracks define the eastern edge of the Washington Neighborhood. U.S. 61/151 is a major transportation route that lies just north of the Blum property. Alliant Energy owns and operates the coal-fired Dubuque Generating Station several blocks from the targeted property. The Washington Neighborhood also borders Dubuque's Historic Millwork District, a 43-acre former industrial area containing over 1 million square feet of warehouse space.

Table 4

	State of Iowa	City of Dubuque	**Census Tract 1**
Total Population	3,093,526	58,409	**2,891**
Percent Minority	8.8%	9.1%	**27.8%**
Individuals Under 5 Years of Age	6.4%	5.9%	**8.1%**
Per Capita Income	$27,950	$24,937	**$17,828**
Median Household Income	$53,183	$47,450	**$23,814**
Did not Graduate High School	11.1%	6.1%	**18.1%**
Households that receive Food Stamps and SNAP Benefits	11.7%	12.6%	**26.4%**
No Vehicles Available	2.2%	3.0%	**15.1%**

All information in the table above obtained from the U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates.

Residents of the target area, as defined by Census Tract 1 in Dubuque County, display considerably different demographic characteristics than those within the City of Dubuque and the State of Iowa. This situation includes a much higher concentration of sensitive populations who are often disadvantaged when contrasted with peer groups.

Census Tract 1 contains a higher proportion of minority residents when compared to the State of Iowa (8.8%) and the City of Dubuque as a whole (9.1%). In the target area, 27.8% of the population falls under the non-white category. The target area also has a slightly elevated percentage of another sensitive population. 8.1% of the residents living in Census Tract 1 are less than 5 years old. This figure is higher than both the City of Dubuque (5.9%) and the State of Iowa (6.4%) rates.

The area surrounding the former Blum Properties, Inc. is also economically disadvantaged when compared to the City of Dubuque as a whole and the State of Iowa. The per capita income for the target area ($17,828) is 28.5% less than the City of Dubuque ($24,937) and 36.2% less than the State of Iowa ($27,950) figures respectively. The median household income figure ($23,814) is also 49.8% less than the City of Dubuque ($47,450) and 55.2% less than the State of Iowa ($53,183). The significant financial disparity between the target area and the city/state is a key indicator of the poor living conditions surrounding the former Blum Properties, Inc. site.

4.2 Community Involvement

The following table summarizes the community involvement activities completed to date:

Table 5

Date	Description
Dec. 04, 2016	City published notice of its intent to apply for an EPA Brownfields Grant within the Dubuque *Telegraph Herald*.
Dec. 04, 2016	City published notice of its intent to apply for an EPA Brownfields Grant in the Dubuque *Telegraph Herald* and requested comments.
Dec. 15, 2016	City hosted a public open house at Crescent Community Health Center (1789 Elm Street) at 6:00 p.m. to discuss the draft grant proposal. This meeting provided an opportunity for the public to ask questions and provide input on the project.
Late Fall/Early Winter 2016	City updated its project website devoted to brownfields revitalization efforts (http://www.cityofdubuque.org/2108/Brownfields).
Sept. 2013	City created an informal repository at City of Dubuque Engineering Department to all interested citizens to obtain information relating to the City's brownfields project. This now includes documents related to the cleanup.

The City has designated Communications Specialist Kristin Hill to inform the community of future actions and to respond to any inquiries (see Section 6.0). The Communications Specialist will use a wide array of tools to keep affected citizens and the entire community familiar with the status of the project. Moreover, many of these methods will offer citizens the chance to ask questions, offer suggestions, and provide comments. The following is a list of the current or planned outreach initiatives.

- Online Presence
  An online presence will be created for the Blum East Site project. A webpage titled "Maintenance Facility and Greenway Center" will be created under the heading "Infrastructure Improvements" on the Bee Branch Watershed Flood Mitigation Project's website: **www.cityofdubuque.org/beebranch**. This webpage will include a repository of project information. When appropriate, project updates and other information will be shared on the Bee Branch Project's Facebook page, Twitter account, and via Nextdoor.com. This online presence will serve as a source of news and information regarding the site and its status.

- Fact Sheet
  The City of Dubuque will prepare a project fact sheet and post it on the Bee Branch Project website mentioned above. The fact sheet will be updated throughout the cleanup program. The purpose of the fact sheet will be to notify the public of planned activities, project milestones, and completion dates.

- Direct Mail Newsletter
  The City of Dubuque will include information regarding the cleanup program in the Bee Branch Watershed Flood Mitigation Project newsletter. The newsletter is mailed three times per year to every property in the Bee Branch Watershed. This is nearly 13,000 addresses including homes, schools, churches, non-profit organizations, and businesses.

- Project Signs
  Signs will be posted at the 501 E. 15th Street site to direct residents to sources of project information including City representatives and the Bee Branch Project website.

- Public Inquiries and Comments
  A Notice of a 20-day Public Comment Period on the results of the ABCA and RE/RA will be published in the local paper by the City. The City will accept written comments on the Cleanup Plan. The City will prepare a written response to significant concerns.

- Informational Meetings
  The City plans to host one or more public information meetings regarding the cleanup program. City representatives and/or consultants will be present to fully answer the community's questions.

- Meeting Notices and Email Updates
  When applicable, public meeting announcements, including date, time, place, and purpose of the public meetings will be submitted by press release to appropriate media outlets, including the *Telegraph Herald*, the local daily newspaper. To notify residents of public meetings and share information regarding project updates, the City will also utilize its existing email and/or text notification system called NotifyMe. The Bee Branch Project NotifyMe has 507 subscribers while the News Releases NotifyMe has 822 subscribers.

- If an environmental covenant is required, IDNR will prepare a public notice discussing the risk assessment findings, completed response action, extents of contamination, and the proposed environmental covenant that will be placed on the site. A public comment period will follow where IDNR will accept written comments prior to issuing an NFA certificate.

All future communication efforts will be consistent with the requirements of the National Contingency Plan to ensure that all actions taken relative to cleanup and redevelopment planning would provide ample public review and comment.

4.3 Key Community Concerns

Dubuque residents live among many former and existing manufacturing sites, which includes the Washington Neighborhood.

The area is highly monitored by EPA for air pollution, hazardous waste and toxic releases. According to EPA's Envirofacts system, 178 facilities are regulated in the Dubuque region, including: 51 stationary sources of air pollution; 5 entities in the Hazardous Waste Report; 2 Superfund sites; 28 permitted dischargers of wastewater; 111 hazardous waste handlers; 18 businesses that use chemicals included on the Toxic Releases Inventory; and 3 companies dealing with chemicals such as polychlorinated biphenyls, asbestos and lead-based paint covered by the Toxic Substances Control Act. Dubuque's air quality is also approaching EPA non-attainment levels. Fine particles (PM 2.5) represent the greatest concern for the region, measuring just under the acceptable standard. EPA's EJSCREEN tool shows Washington Neighborhood residents in the 62nd percentile in proximity to Treatment Storage and Disposal Facilities, the 68th

percentile in proximity to a major direct water discharger, the 70th percentile in proximity to a Risk Management Plan facility, the 81st percentile for lead paint indicators, the 81st percentile for traffic proximity and volume, and the 95th percentile for proximity to a National Priority List site. In addition, a 2012 American Cancer Society study found an elevated incidence of all cancers in the Dubuque region (476.2 per 100,000).
Environmental contamination also poses a risk to aquatic life in the Mississippi River. Cleaning up brownfields near the river will safeguard fish and fowl, and protect vulnerable populations within Dubuque who depend upon the Mississippi River for sustenance.

Dubuque's Washington Neighborhood suffers from serious health inequities. The City seeks EPA funding to address the following health threats at the Blum site:

- ***Lead***: Lead interferes with a variety of body processes and is toxic to many organs and tissues, including the heart, bones, intestines, kidneys, and reproductive and nervous systems.
    - *Sensitive populations:* Children's bodies absorb more lead than adults and their brains and nervous systems are more sensitive to lead's effects. Even very low levels of lead in the blood of children can result in permanent damage to the brain and nervous system, leading to behavior and learning problems, hearing problems, slowed growth, and anemia. Ingestion by children can cause seizures, comas and even death. The Washington Neighborhood has a high concentration of kids under 5 year old (7.4% of Census Tract 1's population is under 5, compared to 5.6% citywide). Pregnant women are also highly vulnerable to lead exposure, which can result in miscarriage, reduced fetus growth and premature birth. Females between 15-50 years old in the Washington Neighborhood had 83 births per 1,000 women, compared to a national rate of 54 births per 1,000.
- ***Arsenic*****:** The International Agency for Research on Cancer has classified arsenic and arsenic compounds as carcinogenic to humans. Long-term exposure to inorganic arsenic, mainly through drinking of contaminated water, eating of food prepared with this water and eating food irrigated with arsenic-rich water, can lead to chronic arsenic poisoning. Skin lesions and skin cancer are the most characteristic effects.
    - *Sensitive populations:* Evidence suggests that inhaled or ingested inorganic arsenic can injure pregnant women and their unborn babies. The Blum site poses an arsenic contamination risk to the Washington Neighborhood's significant population of pregnant women.
- ***PAHs (including benzo[a]pyrene, benzo[b]fluoranthene, chrysene, dibenz(a,h)anthracene, indeno[1,2,3-cd]pyrene, and pyrene)*****:** Exposure to PAHs may cause harmful health effects. Individuals exposed by breathing or skin contact for long periods to mixtures that contain PAHs and other compounds can also develop cancer.
    - *Sensitive populations:* High prenatal exposure to PAH is associated with lower IQ and childhood asthma. The Center for Children's Environmental Health states that exposure to PAH pollution during pregnancy is related to adverse birth outcomes, including low birth weight, premature delivery and heart malformations. Cord blood of babies exposed to PAH pollution has been linked to cancer. PAHs pose a significant risk to kids and pregnant women in the Washington Neighborhood.

- ***Tetrachloroethene*:** EPA considers tetrachloroethylene "likely to be carcinogenic to humans by all routes of exposure." Tetrachloroethene exposure may harm the nervous system, liver, kidneys, and reproductive organs. Exposure to tetrachloroethylene may lead to a higher risk of getting bladder cancer, multiple myeloma or non-Hodgkin's lymphoma.
    - o *Sensitive populations:* Tetrachloroethylene may have effects on pregnancy and unborn children, a particular concern for the Washington Neighborhood residents.
- ***Asbestos*:** Asbestos exposure may increase the risk of lung cancer and mesothelioma. There is also an association between asbestos and gastrointestinal and colorectal cancers, as well as an elevated risk for cancers of the throat, kidney, esophagus, and gallbladder. Asbestos exposure may also increase the risk of asbestosis and other nonmalignant lung and pleural disorders.
    - o *Sensitive populations:* Children's exposure to asbestos is especially concerning because early and long-term exposure increases the risk of developing lung disease and cancer. The Washington Neighborhood has one of Dubuque's highest concentrations of children under 5 years old.
- ***Mercury*:** Exposure to mercury can impair neurological development, as well as damage the gastrointestinal tract, the nervous system and the kidneys.
    - o *Sensitive populations:* Washington Neighborhood children exposed to methylmercury while in the womb can have impacts to their cognitive thinking, memory, attention, language, fine motor skills, and visual spatial skills.

Brownfields, along with other identified cumulative environmental issues, disproportionally impact the Washington Neighborhood. A health needs assessment conducted by the City identified the Washington Neighborhood (a designated Medically Underserved Area) as "high risk." According to the Dubuque County Health Portrait 2014, age-adjusted deaths from all cancer in Dubuque County are 180.47 per 100,000, compared to 175.03 for Iowa. The contaminated Blum property exacerbates the risk of cancer and non-cancer mortality for nearby low-income households, including higher concentrations of pregnant women and children under 5. Contaminated sites like the Blum property also create a negative psychological impact on Washington Neighborhood residents. These brownfields cause blight, attract vandalism and crime, and scare away new development.

As demonstrated in Table 4 above, the Washington Neighborhood (Census Tract 1) is economically challenged, and suffers from serious income inequality. Census Tract 1, which is 27.8% minority as compared to 9.1% for the City, experiences much higher poverty rates (31.8%) and significantly lower median household incomes ($23,814) than Dubuque (16.2%, $47,450), and the State of Iowa (12.5%, $53,183). Education levels in Census Tract 1 are lower than the State and City averages; 18.4% of residents in the area have less than a high school degree, compared to 6.1% in Dubuque and 11.1% for Iowa. Transit, walking and means of transportation other than a personal vehicle are also more important to Washington Neighborhood residents in Dubuque. More than 15.1% of Census Tract 1 workers 16 years and older commute by transit, walking, biking, and other alternative transportation modes, compared to 3.0% citywide.

4.4 Benefits to the Community

Reuse plans for the subject property include constructing a bike trail, bike pavilion, and playground equipment to serve the adjoining Bee Branch Creek daylighting project. The trail will provide important connectivity to the national Mississippi River Trail. The creation of open space in the Washington Neighborhood is welcomed by residents, and aligns with local planning efforts. In 2004, the City and the Washington Neighborhood Association initiated the “Washington: Revitalize!” improvement program, which led to the creation of the Washington Neighborhood Plan. This Plan addresses both physical improvements to enhance livability, and programs necessary to provide less-advantaged citizens with the capacity to “access the ladder of economic opportunity that leads out of poverty.” Redevelopment of the Blum property into a pocket park supports that vision and encourages further revitalization of the Washington Neighborhood.

5.0 CONTACTS and ADMINISTRATIVE RECORD

5.1 Contacts

The City spokesperson for this project is Kristin Hill, Communications Specialist who may be contacted at:

City Hall
50 West 13th Street
Dubuque, IA 52001
khill@cityofdubuque.org
(563) 690-6068 Phone
http://www.cityofdubuque.org/

The IDNR Land Recycling Program Project Officer is Matt Culp, who may be contacted at:

Land Recycling Program
Contaminated Sites Section
Wallace Building
502 East 9th Street
Des Moines, Iowa 50319-0034
Matt.Culp@dnr.iowa.gov
(515) 725-8337 Phone
http://www.iowadnr.gov/Environmental-Protection/Land-Quality/Contaminated-Sites/Land-Recycling-Program-LRP

The U.S. EPA Region 7 Project Officer is Mr. Brad Eaton, who may be contacted at:

Brownfields and Land Revitalization
Region 7 EPA
11201 Renner Blvd
Lenexa, KS 66219
Eaton.Brad@epa.gov
(913) 551-7265 Phone
http://www.epa.gov/region07/

The environmental consultant assisting with this project is Mr. Scott Mattes, of HR Green, Inc., who may be contacted at:

HR Green, Inc.
5525 Merle Hay Road, Suite 200
Des Moines, IA 50131
smattes@hrgreen.com
(515) 278-5277 Phone
www.hrgreen.com

5.2 Administrative Record

The Administrative Record is located in the Engineering Department of the City of Dubuque at 50 W. 13th Street, City Hall, Dubuque, Iowa. Individuals can request and view the document during normal business hours 8:00 AM – 5:00 PM Monday through Friday. A set of documents will also be available at this location during this project, including the 20-day comment period.

The Administrative Record may include but is not limited to:

- Phase I Environmental Site Assessment, December 1, 2015.
- Phase II Environmental Site Assessment, December 4, 2015.
- Analysis of Brownfields Cleanup Alternatives, December 4, 2015.
- EPA documents which include, but are not limited to, quarterly and annual reports.

6.0 CITIZENS GLOSSARY OF ENVIRONMENTAL TERMS

This glossary defines some terms associated with Iowa's Brownfields Cleanup Program.

Administrative Record
A record of all documents (hard copies, electronic files, briefing charts, files, photographs, or other documents and records) relied upon in preparing an EPA document. The administrative record documents the proponent's consideration of all relevant and reasonable factors and should include evidence of diverging opinions and criticisms of the proposed action or its reasonable alternatives.

Analysis of Brownfields Cleanup Alternatives (ABCA)
An analysis of various alternative environmental cleanups for the site that meet the targeted cleanup levels.

Beneficial reuse
A use for the property that benefits the community and is the highest, best use of the property.

Brownfield
An abandoned, idled, or under-used property where the expansion or redevelopment is complicated by real or perceived environmental contamination. Brownfields are typically former industrial or commercial properties where improper operations may have resulted in soil and/or groundwater contamination.

Cleanup
Actions taken to deal with a release or threat of release of a hazardous substance that could affect humans and/or the environment. The term "cleanup" is sometimes used interchangeably with the terms remedial action, removal action, response action, or corrective action.

Compliance
Refers to systems to comply with relevant laws and regulations.

Contamination
Introduction into water, air, and soil of microorganisms, chemicals, toxic substances, wastes, or wastewater in a concentration that makes the medium unfit for its next intended use. Also applies to surfaces of objects, buildings, and various household and agricultural use products.

Data Quality Objectives/Quality Assurance Project Plan (DQO/QAPP)
Data Quality Objectives, or DQOs are qualitative and quantitative statements that specify the quality of data required from a particular activity to support specific decisions. A Quality Assurance Project Plan, or QAPP, is a written document outlining the procedures a monitoring project will use to ensure the data it collects and analyzes meets project requirements and/or DQOs.

Exposure
The amount of pollutant present in a given environment that represents a potential health threat to living organisms.

Hazardous waste
By-products of society that can pose a substantial or potential hazard to human health or the environment when improperly managed. Possesses at least one of four characteristics (ignitability, corrosivity, reactivity, or toxicity), or appears on special EPA lists.

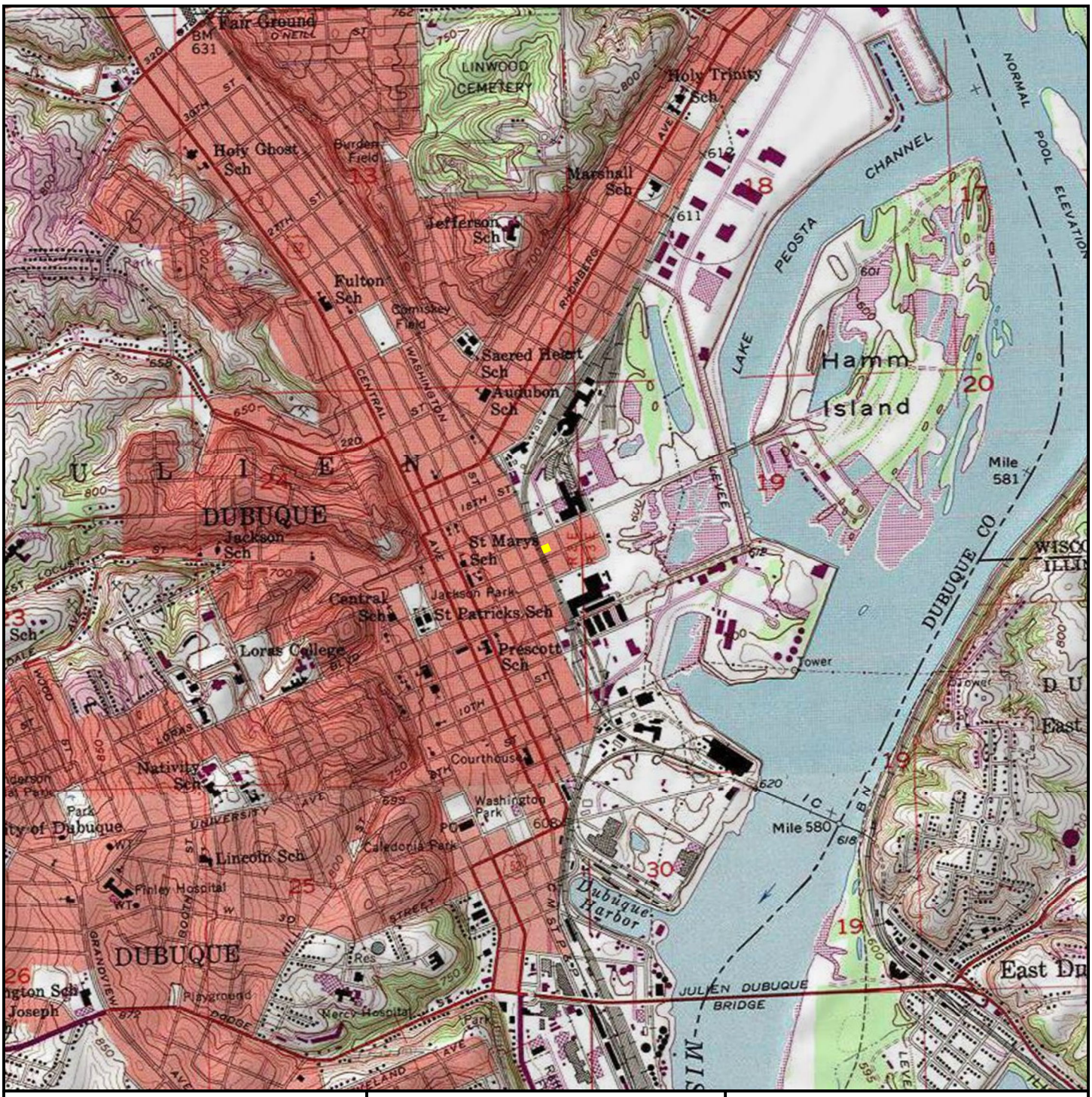
Institutional control
A legal or administrative action or requirement imposed on a property to limit or prevent property owners or other people from coming into contact with contamination on the property. Institutional controls may be used to supplement a cleanup (by limiting contact with residual contamination), or may be used instead of conducting a cleanup.

Land Recycling Program (LRP)
The Land Recycling Program (LRP) allows owners or other stakeholders of a property to voluntarily assess and implement remedial actions at a site that is contaminated or is perceived to be contaminated. The assessment of the property must address the severity of the contamination problems and the risks associated with the contamination. The Department will provide a No Further Action Certificate for the site following assessment and implementation of appropriate cleanup activities and/or other remedies to assure the protection of public health and the environment. This certificate shall provide limited liability protection from further regulatory action relative to the problem(s) addressed.

Risk Evaluation and Response Action (RE/RA) plan
Qualitative and quantitative evaluation of the risk posed to human health and/or the environment by the actual or potential presence and/or use of specific pollutants and how that risk can be resolved.

Standards
Values, which represent concentrations of contaminants in groundwater and soil for which normal, unrestricted exposure is considered unlikely to pose a threat to human health.

APPENDIX A



Legend

Subject Property

THE CITY OF DUBUQUE
Masterpiece on the Mississippi

Figure 1

Site Vicinity Map

501 East 15th Street

City of Dubuque
Dubuque County, Iowa

N
W E
S

0 1,000 2,000 Feet

1 inch = 2,000 feet

HRGreen

Legend

Subject Property

THE CITY OF DUBUQUE
Masterpiece on the Mississippi

Figure 2

Site Location Map

501 East 15th Street

City of Dubuque
Dubuque County, Iowa

N
W E
S

0 50 100 Feet

1 inch = 100 feet

HRGreen