

A. TITLE PAGE

Name: **City of Dubuque**
Hazardous Substances Cleanup Grant- East Blum Property
Final Programmatic Performance Report

Assistance ID#: **BF 97756201**

Project Period: **October 1, 2016 – December 31, 2019**

Date Submitted: **May 3, 2020**

Prepared for: **Ms. Deborah Kennedy, EPA Region 7 Office**
11201 Renner Road
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Mr. Jonathan Harrington, EPA Region 7 Office
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B. REPORT NARRATIVE

1.1 INTRODUCTION

The East Blum property (site) consists of two adjoining parcels generally described as 501 East 15th Street in Dubuque, Iowa. Historical documents dating back to 1884 indicate the 0.23-acre site originally developed with residential homes and commercial uses including a grocery store and saloon. It transitioned to industrial development in 1963, operating as a scrap yard/recycling business until the City of Dubuque (City) acquired the site in 2015.

The City secured an EPA Brownfields Community-Wide Assessment Grant in 2013 to begin to inventory, assess, characterize, and conduct planning and community involvement related to brownfields sites within three targeted areas. The City had a goal of transitioning blighted properties in the Washington Neighborhood, which includes the site, into opportunities for additional housing and small businesses. The former Blum operation was identified as key to advancing the project. Investigations completed on the site under the Assessment Grant identified elevated levels of contamination that required remediation (see Section 1.2 below). The City received a U.S. Environmental Protection Agency (EPA) Brownfields Cleanup Grant in 2016 to evaluate, design, and implement a permanent cleanup remedy for impacted soils at the site.

1.2 Previous Investigations

The City conducted several environmental investigations on the site prior to receiving the EPA Brownfields Cleanup Grant. The following bullet points offer a summary of each report.

- Advanced Environmental Testing and Abatement completed an Asbestos Inspection Report on behalf of the City. This inspection, dated July 30, 2015, identified 4,500 square feet of transite siding, 20 windows with glazing that contained asbestos, 10 square feet of tar sealing a roof vent, and 50 square feet of tar on the flashing of the lean-to structure.
- HR Green, Inc. completed a Phase I ESA on behalf of the City under EPA Brownfields Cooperative Agreement BF-97741401 in accordance with ASTM E 1527-13. The report, dated December 1, 2015, identified several on-and-off-site RECs associated with the site and surrounding properties.
- HR Green, Inc. completed a Phase II ESA on behalf of the City under EPA Brownfields Cooperative Agreement BF-97741401 in accordance with ASTM E 1903-11. The report, dated December 4, 2015, identified shallow soil and groundwater impact. Benzo[a]pyrene at location SB5 was identified at a level above a previously more restrictive statewide standard (SWS) (0.31 mg/kg) but below the current SWS (2.3 mg/kg). Lead and arsenic at locations SB1, SB2, and SB5 were identified at levels above the SWS.

Benzo[a]pyrene, benzo[b]fluoranthene, dibenz(a,h)anthracene, indeno[1,2,3-cd]pyrene, and tetrachloroethene were detected above protected groundwater SWS and below non-protected groundwater SWS. The City 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 Dubuque County's Health Department. Further, no wells may be installed within 500 feet of a LUST site. The County's Health Department prevents the installation of new wells on the site or adjacent properties. This action severs the groundwater ingestion pathway for the site.

The results of the study indicated that the site was not suitable for future residential, commercial, or industrial purposes without remediation of shallow soil. The levels of lead and arsenic contamination detected at SB5 indicated that the surface material covering the slab

indoors would likely need to be managed as hazardous waste and should be mitigated prior to demolition. Lead and arsenic exceedances were noted in several locations around the building footprint. The report stated that Range 1 soil sampling should be conducted once demolition of existing structures is completed.

2.0 RESULTS OF THE BROWNIELDS COOPERATIVE AGREEMENT

EPA Brownfields Cleanup Grant funds allowed the City to enroll the East Blum site in the Iowa Department of Natural Resources (IDNR) Land Recycling Program (LRP) to earn a No Further Action (NFA) certificate. The process required the City to fully assess the extent of soil contamination, complete a risk evaluation, develop response actions, and conduct cleanup work including the excavation of contaminated soils and the backfill and compaction of the referenced area.

2.1 Cooperative Agreement Oversight

Activities completed under the Cooperative Agreement Oversight task focused on satisfying the programmatic requirements of the grant. Specifically, the City accomplished the following during the project period:

- Procured a Qualified Environmental Professional (QEP) through the request for qualifications (RFQ) process
- Developed a Quality Assurance Project Plan (QAPP)
- Completed and submitted 12 quarterly reports to the EPA
- Completed and submitted 3 annual MBE/WBE reports to the EPA
- Completed and submitted a Final Programmatic Performance Report to the EPA within the 90-day period (March 31, 2020) following the expiration date (December 31, 2019) of this grant
- Conducted conference calls on an as-needed basis with its QEP and EPA Project Officers to discuss the City's progress towards completing tasks as outlined in the Cooperative Agreement

2.2 Community Outreach and Involvement

Active participants are essential to the success of any brownfields project. As such, the City made a concerted effort as part of the Community Outreach and Involvement task to involve and empower citizens by disseminating information concerning cleanup options, engaging the public in meaningful dialog about redevelopment, and making all project-related documents readily available for viewing. The City utilized the following outreach methods/tools during the project period:

- **Outreach Campaign.** The City gathered feedback from residents on the types of activities and equipment they thought would best serve the community on the East Blum Site from September 14 to December 15, 2017. The public was asked to vote for their three favorite concepts from a list of twelve options and/or submit their ideas. Through a combination of public events, paper ballots, and online forms, the City received almost 600 responses. Preferred concepts included a natural playscape, climbing opportunities, a bike and scooter playground, access to the water, and outdoor fitness equipment.
- **Community Relations Plan.** The City completed a Community Relations Plan (CRP) during the 4th Quarter of Federal Fiscal Year 2017. It had a stated purpose to "identify the communication strategies that will address the needs and concerns of the City's citizens." The plan described 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.

- **Brownfields Website.** The City created a webpage for the site that launched in late August 2017 (<https://www.cityofdubuque.org/1821/Flood-Mitigation-Maint-Facility>). The tool provided a repository of project documents such as the Community Relations Plan, ABCA, Phase I ESA, Phase II ESA, Asbestos Survey, and Smelter Asbestos Report; an overview on the City's plans to redevelop the site along the restored Bee Branch Creek and the related Brownfields cleanup process; a summary of environmental benefits of the cleanup/redevelopment and how the project supported the City's sustainability goals.
- **Public Report Filing System.** The City maintained a repository of all completed brownfields reports, documents, etc. related to the East Blum site at City Hall. The Administrative Record was available for public viewing during normal business hours of 8:00 am to 5:00 pm, Monday through Friday. The Administrative Record included the following:
 - Phase I Environmental Site Assessment, 501 East 15th Street, Dubuque, Iowa, HR Green, Inc., December 1, 2015.
 - Phase II Environmental Site Assessment, Blum East Side Property, 501 East 15th Street, Dubuque, Iowa, HR Green, Inc., December 4, 2015.
 - Analysis of Brownfields Cleanup Alternatives, East Blum Property, 501 East 15th Street, Dubuque, Iowa, HR Green, Inc., December 5, 2015 (Finalized April 24, 2019).
 - Community Relations Plan, Blum East Site, 501 East 15th Street, Dubuque, Iowa, July 28, 2017.
 - East Blum Cleanup Project Data Quality Objectives & Generic Quality Assurance Project Plan, HR Green, Inc., September 19, 2017 (Amendment #1: January 1, 2018 and Amendment #2: April 27, 2018).
 - East Blum Cleanup Project Data Quality Objectives (DQO) and Generic Quality Assurance Project Plan, September 19, 2017, and amendment (March 12, 2018).
 - IDNR LRP Site Assessment Report, East Blum Property, 501 East 15th Street, Dubuque, Iowa, HR Green, Inc., June 5, 2019.
 - IDNR LRP Risk Evaluation & Response Action (RE/RA) Plan, East Blum Property, 501 East 15th Street, Dubuque, Iowa, HR Green, Inc., June 6, 2019.
 - IDNR LRP Remedial Action Implementation Report, East Blum Property, 501 East 15th Street, Dubuque, Iowa, HR Green, Inc., December 12, 2019.
 - East Blum Property Hazardous Substances Cleanup Grant Final Programmatic Performance Report, March 25, 2020.
 - Quarterly Progress Reports #1-13.
- **ABCA Public Comment Period.** The City posted an electronic version of its draft ABCA for review on its brownfields website for a timeframe exceeding two years. Further, the City made all project documents available for review at City Hall including the ABCA, EPA Brownfields Cleanup Grant application, Cooperative Agreement Work Plan, Community Relations Plan, QAPP, and previous environmental investigations to help provide context on the preferred cleanup alternative. City staff did not receive any public input.

The outreach activities educated the community about the Brownfields program, increased the public's awareness of the potential health impacts related to the identified contaminants, provided opportunities for quality public input as it relates to redevelopment, and delivered critical project updates to the public.

2.3 Brownfields Cleanup Activities

The Brownfields Cleanup Alternatives task included budgetary allocation for the City's QEP to prepare the LRP application, participation agreement, work plan, and cleanup specifications with necessary project bid documents for contractors. The City also expended funds on IDNR LRP enrollment fees and coordinating its efforts with IDNR and EPA to ensure the Cleanup Grant actions prevented

exposure of contaminants and protected human health and the environment. Remaining task funds covered costs associated with implementing the cleanup actions.

The City selected Controlled Asbestos Inc. (Controlled Asbestos) to complete asbestos abatement and lead dust removal. The company conducted the work from March 19-22, 2018. Controlled Asbestos filed asbestos notification of demolition and renovation and very small quantity generator certification forms for the asbestos and lead dust abatement, respectively, prior to commencing the work. ACM and lead dust was disposed of at the Dubuque Metropolitan Area Solid Waste Agency's landfill.

The City contracted Tschiggfrie Excavating (Tschiggfrie) to provide excavation, hauling, site grading, backfill, and restoration services. The contractors excavated the top three (3) feet of material from impacted areas on September 18, 2019. Tschiggfrie subsequently hauled 218.67 tons of soil, totaling approximately 156 cubic yards, to the Dubuque Metropolitan Area Solid Waste Agency's landfill for disposal. The landfill treated the soil as non-hazardous material based on analytical results from composite samples. Upon completion of the referenced activities, contractors brought clean backfill and graded the site to meet remedial design specifications. Photographs of cleanup activities are included in Attachment 5. IDNR issued a NFA certificate for the cleanup project on January 7, 2020 (see Attachment 6).

3.0 SCHEDULE SUMMARY

The City satisfied all grant requirements including complying with the cooperative agreement work plan, schedules, terms, and conditions and successfully completed all reporting (e.g. quarterly progress reports, MBE/WBE utilization forms, financial status reports, etc.) in a timely-manner during the project period. City staff requested a six-month extension of its cooperative agreement as an extensive outreach campaign focused on gathering reuse planning feedback for the East Blum site unintentionally delayed the City's ability to coordinate the removal of hazardous materials and demolition of remaining buildings during the expected timeframe. EPA approved the request on March 12, 2018. The City requested a second six-month extension on March 8, 2019. Unexpected circumstances including a transition in the environmental consultant's leadership team, extreme weather conditions, and a federal government shutdown caused delays in project progress. EPA approved the request on March 21, 2019.

4.0 BUDGET SUMMARY

The City made minor modifications to the task budgets during the project period including the following:

- The City transferred \$608 from Task 2 (Community Outreach and Involvement) and \$39,503 from Task 3 (Brownfields Cleanup Activities) to Task 1 (Cooperative Agreement Oversight) during QTR3 of FY17. All of the referenced funds involved the contractual (cost share) portion of the budget.
- The City transferred \$750 in personnel budget from Task 3 to "other" budget in Task 3 to cover the LRP enrollment fee in QTR1 of FY18. The referenced funds involved the cost share portion of the budget.
- The City added \$16,000 in cost share funds to the contractual portion of Task 2 to cover public involvement activities associated with re-use planning activities for the East Blum site during QTR1 of FY18.
- The City transferred its remaining Task 3 contractual budget (\$48,561.34) to the contractual portions of Task 1 and Task 2 in QTR 2 of FY20. Unforeseen scope changes in the East Blum cleanup project, such as the discovery of less impacted soil than predicted, caused the City to draw down considerably less grant funds than originally anticipated. The City also transferred \$1,000 from the Task 1 travel budget to the cost share contractual portion of Task 2. EPA

approved the action during a phone conference on May 1, 2020.

Refer to Attachment #1 for copies of the City's Summary of Quarterly Expenses by Task and for a Summary of Quarterly Expenses by Category.

C. REPORT ATTACHMENTS

Attachment 1: Table 1 – Summary of Quarterly Expenses by Task

Table 2 – Summary of Quarterly Expenses by Category

Attachment 2: Annual Financial Status Report (SF-425)

Attachment 3: MBE/WBE Utilization (EPA Form 5700-52A)

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Attachment 5: Project Photographs

Attachment 6: No Further Action (NFA) Certificate

ATTACHMENT 1

TABLE 1: SUMMARY OF QUARTERLY EXPENSES BY TASK
TABLE 2: SUMMARY OF QUARTERLY EXPENSES BY CATEGORY

Attachment 1

**East Blum Property Cleanup Grant
BF 97756201**

October 1, 2016 – December 31, 2019

Table 1 - Summary of Grant Total Expenses through December 31, 2019

Work Plan Tasks	Approved Work Plan Budget	Previously Expended	Expenses this Quarter	Total Cumulative Expenses
Task 1 – Cooperative Agreement Oversight	\$12,000	\$53,344.41	\$2,638.09	\$55,982.50
Task 2 – Community Outreach & Involvement	\$10,000	\$22,879.17	\$40.00	\$22,919.17
Task 3 – Brownfields Cleanup Activities	\$255,000	\$144,032.98	\$79,441.61	\$223,474.59
<i>Total Cumulative Expenses</i>	<i>\$277,000</i>	<i>\$220,256.56</i>	<i>\$82,119.70</i>	<i>\$302,376.26</i>

Table 2 - Summary of Grant Expenses by Category – Total Grant Expenditures through December 31, 2019

	Task 1 – Cooperative Agreement Oversight		Task 2 – Community Outreach & Involvement		Task 3 – Brownfields Cleanup Activities		Total	
	Federal	Cost Share	Federal	Cost Share	Federal	Cost Share	Federal	Cost Share
Personnel		\$6,496.80		\$2,962.30		\$21,581.91		\$31,041.01
Fringe Benefits		\$2,242.19		\$900.24		\$7,772.82		\$10,915.25
Travel								
Equipment								
Supplies				\$40.00!		\$5,866.36		\$5,906.36
Contractual	\$47,243.51 HRG \$47,243.51		\$1,317.83 HRG \$1,317.83	\$17,564.84 HRG \$1,619.18 IIW \$4,943.96 Ken Saiki Design \$10,001.70 Brownfield Conf. \$1,000	\$151,344.04 HRG \$64,512.76 Controlled Asbestos \$31,990.00 Test America \$2,856.89 BGS \$7,175.44 Tschiggfrie Excavation \$44,808.95	\$36,064.84 Sealmaster Foam \$18,000.00 Tschiggfrie Excavation \$13,764.84 Blackstone \$4,300.00	\$199,905.38	\$52,629.68
Other				\$133.96^	\$94.62#	\$750.00*	\$94.62	\$883.96
SUBTOTAL	\$47,243.51	\$8,738.99	\$1,317.83	\$21,601.34	\$151,438.66	\$72,035.93	\$200,000	\$102,376.26
TOTAL	\$55,982.50		\$22,919.17		\$223,474.59		\$302,376.26	

* IDNR Land Recycling Program Application Fee (\$750)

Legal notice fees (\$94.62)

^ Sign rental (\$133.96)

! Professional photograph (\$40.00)

ATTACHMENT 2

ANNUAL FINANCIAL STATUS REPORT
(SF-425)

FEDERAL FINANCIAL REPORT

(Follow form instructions)

1. Federal Agency and Organizational Element to Which Report is Submitted	2. Federal Grant or Other Identifying Number Assigned by Federal Agency (To report multiple grants, use FFR Attachment)			Page	of
				1	pages

3. Recipient Organization (Name and complete address including Zip code)

4a. DUNS Number	4b. EIN	5. Recipient Account Number or Identifying Number (To report multiple grants, use FFR Attachment)	6. Report Type	7. Basis of Accounting
			<input type="checkbox"/> Quarterly	<input type="checkbox"/> Cash
			<input type="checkbox"/> Semi-Annual	<input type="checkbox"/> Accrual
			<input type="checkbox"/> Annual	
			<input type="checkbox"/> Final	

8. Project/Grant Period From: (Month, Day, Year)	To: (Month, Day, Year)	9. Reporting Period End Date (Month, Day, Year)
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10. Transactions	Cumulative
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(Use lines a-c for single or multiple grant reporting)

Federal Cash (To report multiple grants, also use FFR Attachment):

a. Cash Receipts	
b. Cash Disbursements	
c. Cash on Hand (line a minus b)	

(Use lines d-o for single grant reporting)

Federal Expenditures and Unobligated Balance:

d. Total Federal funds authorized	
e. Federal share of expenditures	
f. Federal share of unliquidated obligations	
g. Total Federal share (sum of lines e and f)	
h. Unobligated balance of Federal funds (line d minus g)	

Recipient Share:

i. Total recipient share required	
j. Recipient share of expenditures	
k. Remaining recipient share to be provided (line i minus j)	

Program Income:

l. Total Federal program income earned	
m. Program income expended in accordance with the deduction alternative	
n. Program income expended in accordance with the addition alternative	
o. Unexpended program income (line l minus line m or line n)	

11. Indirect Expense	a. Type	b. Rate	c. Period From	Period To	d. Base	e. Amount Charged	f. Federal Share
					g. Totals:		

12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation:

13. Certification: By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and intent set forth in the award documents. I am aware that any false, fictitious, or fraudulent information may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

a. Typed or Printed Name and Title of Authorized Certifying Official <i>Steven Sampson Brown - Project Manager</i>	c. Telephone (Area code, number and extension)
	d. Email address
b. Signature of Authorized Certifying Official <i>St. S. Brown</i>	e. Date Report Submitted (Month, Day, Year)
	14. Agency use only:

Standard Form 425 - Revised 6/28/2010
OMB Approval Number: 0348-0061
Expiration Date: 10/31/2011

Paperwork Burden Statement

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is 0348-0061. Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0061), Washington, DC 20503.

ATTACHMENT 3

MBE/WBE UTILIZATION FORM
(EPA FORM 5700-52A)

**U.S. ENVIRONMENTAL PROTECTION AGENCY
 MBE/WBE UTILIZATION UNDER FEDERAL GRANTS
 AND COOPERATIVE AGREEMENTS**

PART I. (Reports are required even if no procurements are made during the reporting period.)

1A. FEDERAL FISCAL YEAR (Oct. 1-Sep 30) 20_____	1B. REPORTING PERIOD (Check ALL appropriate boxes) <input type="checkbox"/> 1 st (Oct-Dec) <input type="checkbox"/> 2 nd (Jan-Mar) <input type="checkbox"/> 3 rd (Apr-Jun) <input type="checkbox"/> 4 th (Jul-Sep) <input type="checkbox"/> Semi-Annual (Oct-Mar) <input type="checkbox"/> Semi-Annual (Apr-Sep) <input type="checkbox"/> Annual <input type="checkbox"/> Check if this is the last report for the project (Project completed).		
1C. REVISION OF A PRIOR REPORT? Y or N Year: _____ Quarter: _____	BRIEFLY DESCRIBE THE REVISIONS YOU ARE MAKING:		
2A. EPA FINANCIAL ASSISTANCE OFFICE ADDRESS (ATTN: DBE Coordinator)		3A. RECIPIENT NAME AND ADDRESS	
2B. EPA DBE COORDINATOR Name: E-mail:	2C. PHONE: Fax:	3B. RECIPIENT REPORTING CONTACT: Name: E-mail:	3C. PHONE: Fax:
4A. FINANCIAL ASSISTANCE AGREEMENT ID NUMBER (SRF State Recipients, refer to Instructions for Completion of blocks 4A, 5A and 5C.)		4B. FEDERAL FINANCIAL ASSISTANCE PROGRAM TITLE or CFDA NUMBER:	
5A. TOTAL ASSISTANCE AGREEMENT AMOUNT (SRF State Recipients, refer to Instructions for Completion of blocks 4A, 5A and 5C.) EPA Share: \$_____ Recipient Share: \$_____	5B. If NO procurement and NO accomplishments were made this reporting period (by the recipients, sub-recipients, loan recipients, and prime contractors), CHECK and SKIP to Block No. 7. (<u>Procurements</u> are all expenditures through contract, order, purchase, lease or barter of supplies, equipment, construction, or services needed to complete Federal assistance programs. <u>Accomplishments</u> , in this context, are procurements made with MBEs and/or WBEs. <input type="checkbox"/>		
5C. Total Procurements This Reporting Period (Only include amount not reported in any prior reporting period)			
Total Procurement Amount \$_____ (Include total dollar values awarded by recipient, sub-recipients and SRF loan recipients, including MBE/WBE expenditures .)			
5D. Were sub-awards issued under this assistance agreement? Yes _____ No _____ Were contracts issued under this assistance agreement? Yes _____ No _____			
5E. MBE/WBE Accomplishments This Reporting Period Actual MBE/WBE Procurement Accomplished: (Include total dollar values awarded by recipient, sub-recipients, SRF loan recipients and Prime Contractors.)			
Construction \$ MBE : _____	Equipment \$ WBE : _____	Services _____	Supplies _____
Total _____			
6. COMMENTS: (If no MBE/WBE procurements were accomplished during the reporting period, please explain what steps you are taking to achieve the MBE/WBE Program requirements specified in the terms and conditions of the Assistance Agreement.)			
7. NAME OF RECIPIENT'S AUTHORIZED REPRESENTATIVE		TITLE	
8. SIGNATURE OF RECIPIENT'S AUTHORIZED REPRESENTATIVE		DATE	

ATTACHMENT 4

LOBBYING AND LITIGATION CERTIFICATION FORM
(EPA FORM 5700-53)



LOBBYING AND LITIGATION CERTIFICATION FOR GRANTS AND COOPERATIVE AGREEMENTS*

INSTRUCTIONS:

*At project completion, complete this form pursuant to the 2001 Department of Veterans Affairs and Housing and Urban Development, and Independent Appropriations Act, Public Law 106-377, Section 424 and 2000 Department of Veterans Affairs and Housing and Urban Development, and Independent Appropriations Act, Public Law 106-74, Section 426 and any other subsequent Appropriation Act requirements.

Please mail this form to your EPA Grant Specialist within 90 days of project completion. DO NOT send this information to the Office of Management & Budget.

Assistance Agreement Number(s):

I hereby certify that none of these funds have been used to engage in the lobbying of the Federal Government or in litigation against the United States unless authorized under existing law.



Signature of the Chief Executive Officer

Date

Print Name

Burden Statement - The annual public reporting and record keeping burden for this collection of information is estimated to average 5 minutes per respondent. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Regulatory Information Division, U.S. Environmental Protection Agency, Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Mail Code 3213A, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Include the EPA ICR number and OMB control number in any correspondence.

ATTACHMENT 5
PROJECT PHOTOGRAPHS



Photo 1 – View looking northwest at the subject property prior to demolition and cleanup activities.



Photo 2 – View looking west at the subject property prior to demolition and cleanup activities.

**EAST BLUM PROPERTY:
BROWNFIELDS CLEANUP PROJECT**

THE CITY OF
DUBUQUE
Masterpiece on the Mississippi



Photo 3 – View looking northwest at the subject property prior to demolition and cleanup activities.



Photo 4 – Hazardous materials storage with associated staining in the subject property prior to removal.

**EAST BLUM PROPERTY:
BROWNFIELDS CLEANUP PROJECT**





Photo 5 – Hazardous materials storage with associated staining in the subject property prior to removal.



Photo 6 – Hazardous materials storage with associated staining in the subject property prior to removal.

**EAST BLUM PROPERTY:
BROWNFIELDS CLEANUP PROJECT**

THE CITY OF
DUBUQUE
Masterpiece on the Mississippi



Photo 7 – Hazardous materials storage with associated staining in the subject property prior to removal.



Photo 8 – Battery storage area in the subject property prior to removal.

**EAST BLUM PROPERTY:
BROWNFIELDS CLEANUP PROJECT**

THE CITY OF
DUBUQUE
Masterpiece on the Mississippi



Photo 9 – View looking north at the subject property following hazardous materials abatement and prior to demolition.



Photo 10 – View looking east at the subject property following hazardous materials abatement and prior to demolition.

**EAST BLUM PROPERTY:
BROWNFIELDS CLEANUP PROJECT**

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Masterpiece on the Mississippi



Photo 11 – View looking northwest at the subject property following demolition during over-excavation cleanup.



Photo 12 – View looking southwest at the subject property following demolition during over-excavation cleanup.

**EAST BLUM PROPERTY:
BROWNFIELDS CLEANUP PROJECT**





Photo 13 – View looking west/southwest across the subject property following cleanup and grading activities.



Photo 14 – View looking northeast across the subject property following cleanup and grading activities.

**EAST BLUM PROPERTY:
BROWNFIELDS CLEANUP PROJECT**

THE CITY OF 
DUBUQUE
Masterpiece on the Mississippi



Photo 15– Signage highlighting the redevelopment project.



Photo 16 – Signage highlighting the redevelopment project.

**EAST BLUM PROPERTY:
BROWNFIELDS CLEANUP PROJECT**

**THE CITY OF
DUBUQUE**
Masterpiece on the Mississippi

ATTACHMENT 6
NO FURTHER ACTION (NFA) CERTIFICATE



JANUARY 7, 2020

STEVE SAMPSON BROWN
CITY OF DUBUQUE
50 WEST 13th STREET
DUBUQUE, IOWA 52001

Dear Mr. Brown,

Please find enclosed the signed and notarized No Further Action Certificate for the Blum East site located at 501 East 15th Street in Dubuque, Iowa. With this certificate, the site has successfully completed the voluntary Iowa Land Recycling Program with all associated liability protections.

Please contact me at 1-515-725-8337 if you have any questions.

Regards

Matt Culp
Senior Environmental Specialist
IDNR Contaminated Sites Section

CC:  Rose Amundsen, HR Green 8710 Earhart Lane SW Cedar Rapids, Iowa 52404 ✓
Amie Davidson, Supervisor, Iowa DNR Solid Waste and Contaminated Sites Section



**IAWA DEPARTMENT OF NATURAL RESOURCES
LAND RECYCLING PROGRAM**



**NO FURTHER ACTION CERTIFICATE
For
BLUM EAST
501 East 15th Street
Dubuque IA, Dubuque County, Iowa**

This document certifies that all or a portion of the property described herein has satisfied regulatory standards qualifying the area for a No Further Action classification under Iowa's Land Recycling Program (LRP) in accordance with the administrative rules contained in chapter 567 Iowa Administrative Code (IAC) 137. A No Further Action classification generally means that voluntary participants in the LRP have identified and assessed certain contaminants of concern and sufficiently addressed those contaminants such that the risk to human health, safety and the environment from those contaminants is deemed acceptable according to standards adopted by the Iowa Department of Natural Resources.

Pursuant to Iowa Code § 455H.304, a classification of No Further Action relieves protected parties from certain future environmental liabilities due to environmental claims resulting from the presence of hazardous substances at, or the future release of hazardous substances from, all or a portion of the property. The scope of the liability protection generally corresponds to the scope of the environmental condition(s) that qualifies for the No Further Action classification.

EXHIBITS:

Exhibit A provides a description of the enrolled property. A topographic map showing the location of the site in Dubuque, Iowa and an aerial view of the enrolled property is provided in Exhibit A, Figure 1 (Site Vicinity Map) and Figure 2 (Site Location Map). This No Further Action classification applies to soil only in the areas within the enrolled property defined as the Affected Areas. An aerial view of the outline of the Affected Areas within the enrolled property is provided in Exhibit A, Figure 3.

Exhibit B includes a brief narrative summary of the activities undertaken to address contaminated soil on the enrolled property and the regulatory process that has resulted in this No Further Action classification.

Exhibit C contains a list of the contaminants of concern in soil that were addressed and were identified during site assessment activities. The No Further Action classification applies only to the contaminants of concern in soil that are listed in Exhibit C.

AFFECTED AREAS:

The Affected Areas exist within the parcel legally described in Exhibit A, Figure 3.

ENROLLED PROPERTY OWNER:

City of Dubuque
50 West 13th Street
Dubuque Iowa 52404

LRP ENROLLED PARTICIPANT:

City of Dubuque
1/2 Steve Sampson Brown
50 West 13th Street

Dubuque, Iowa 52404

DNR FILE REFERENCE:

CON: 12-15 Blum East Site Property
Site ID# 2349 (Contaminated Sites Section Database)

CONDITIONAL NO FURTHER ACTION CLASSIFICATION:

The conditional No Further Action classification does not apply to this site for soil in the Affected Area since remediation (removal) achieved conditions acceptable to residential standards.

INSTITUTIONAL CONTROLS:

No institutional controls apply to this site as a result of the remedial action taken for soil in the Affected Area which no longer contains levels of contamination that exceed the LRP residential Statewide Standard for soil.

TECHNOLOGICAL CONTROLS:

No technological controls are required.

PUBLIC NOTICE:

IN ACCORDANCE WITH IOWA CODE CHAPTER 455H AND IOWA DEPARTMENT OF NATURAL RESOURCES ADMINISTRATIVE RULES, PARTICIPANTS IN THE LAND RECYCLING PROGRAM MAY NOT HAVE BEEN REQUIRED TO IDENTIFY AND ADDRESS ALL KNOWN OR SUSPECTED RELEASES OF CONTAMINANTS IN ORDER TO QUALIFY FOR A NO FURTHER ACTION CLASSIFICATION. FOR THE AFFECTED AREA IDENTIFIED IN THIS CERTIFICATE OR THE REAL ESTATE AFFECTED BY THIS RECORDED DOCUMENT, INTERESTED PARTIES MAY CONTACT THE DEPARTMENT TO OBTAIN FURTHER INFORMATION.

This certificate does not constitute a warranty or a representation of any kind to any person as to the environmental condition, marketability or value of the above-referenced property other than providing the certification required by Iowa Code §§ 455H.301, *et seq.* Interested parties should not rely solely on the representations contained in this certificate and should contact the Iowa Department of Natural Resources to obtain more information on the environmental conditions assessed within the Affected Areas and any potential environmental concerns not specifically addressed or associated with areas outside the Affected Areas.

Kayla Sy

KAYLA LYON, DIRECTOR

IOWA DEPARTMENT OF NATURAL RESOURCES

STATE OF IOWA)
)
COUNTY OF POLK)

Signed or attested before me on this 23rd day of December, 2019, by

Kelli Barber Book, My Commission Expires 2-23-2022
NOTARY PUBLIC, STATE OF IOWA

7-23-2022

EXHIBITS

EXHIBIT A: LEGAL DESCRIPTION OF THE BLUM EAST SITE (See Figures 1 through 3)

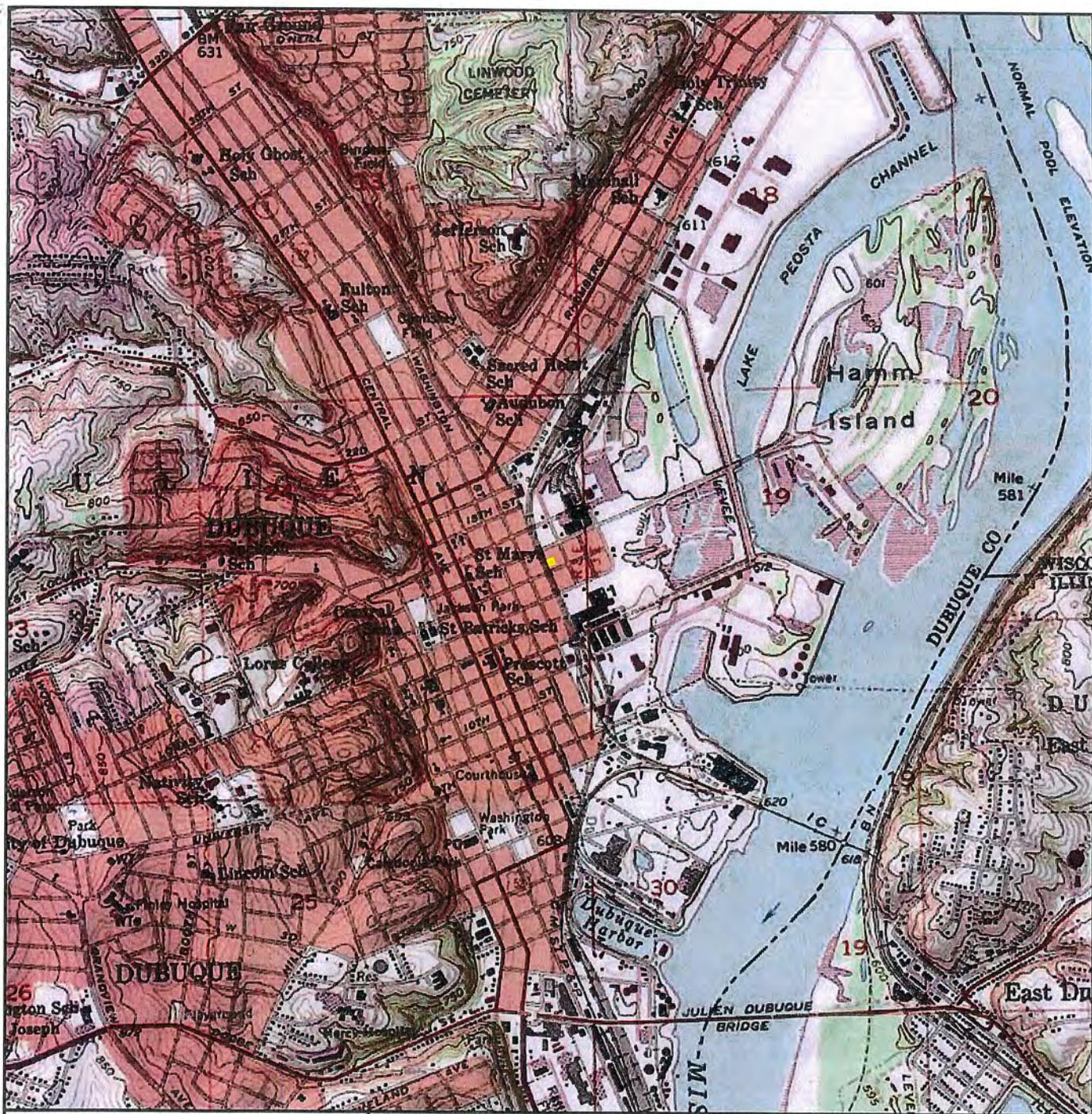
PIN	Address	Acres	Legal Description
1024284007	501 East 15 th Street	0.15	S 15'-255 & LOT 256 EAST DUBUQUE NO. 2 501-509 E 15TH ST
1024284006	E 15 th Street	0.08	N 35'- LOT 255 EAST DUBUQUE NO. 2
1024283901	501 East 15 th Street	N/A	W 65'-221 EAST DUBUQUE ADD "BLDG ON LEASED LAND"

EXHIBIT B: Narrative summary of the activities undertaken on the enrolled property and the regulatory process that has resulted in this No Further Action classification.

- Site Enrollment: The site was enrolled into the Land Recycling Program in July 2017 to assess and mitigate polycyclic-aromatic hydrocarbons (PAHs) and heavy (RCRA) metal contamination in soil.
- Site Assessment: A Site Assessment Report was completed in June 2019 and included a total of twenty-nine (29) soil borings were advanced on or surrounding the site to achieve horizontal and vertical delineation of the RCRA metals and to further investigation possible presence of PAHs. Although PAH concentrations were not previously reported above Statewide Standards (SWSs), they were included to verify that they were not present beneath existing structures at unacceptable concentrations in previously inaccessible locations. All PAH- analyzed samples were below SWSs and thus not included in the RE/RA. Horizontal and vertical delineation for the RCRA metals exceedances (arsenic and lead) was successful. The delineated extent of arsenic and lead is included Figure 3.
- A Risk Evaluation and Response Action (RERA) Plan: The RERA, also completed in June, 2019 was developed to evaluate the arsenic and lead contamination detected above SWSs in soil in order to determine health risks and to present possible response actions to address the risk in accordance with the IDNR LRP. All risks were acceptable with the exception of the Range 1 (shallow) soil exposure to a site resident. Public Notice of the RE/RA approval was published in the Dubuque Telegraph Herald on June 28, 2019.
- Response Action: The RA was implemented in September, 2019 and involved removal of the top three feet of soil from the affected area that exceeded SWSs. The affected area covered a total area of approximately 2,750 square feet for a total of 8,250 cubic feet of soil. Confirmation soil sampling for lead and arsenic was conducted throughout the excavation area along the side walls and floor (Figure 3).

EXHIBIT C:

- Contaminants of Concern: arsenic and lead in shallow soil.



Legend

Subject Property



Figure 1
Site Vicinity Map

501 East 15th Street

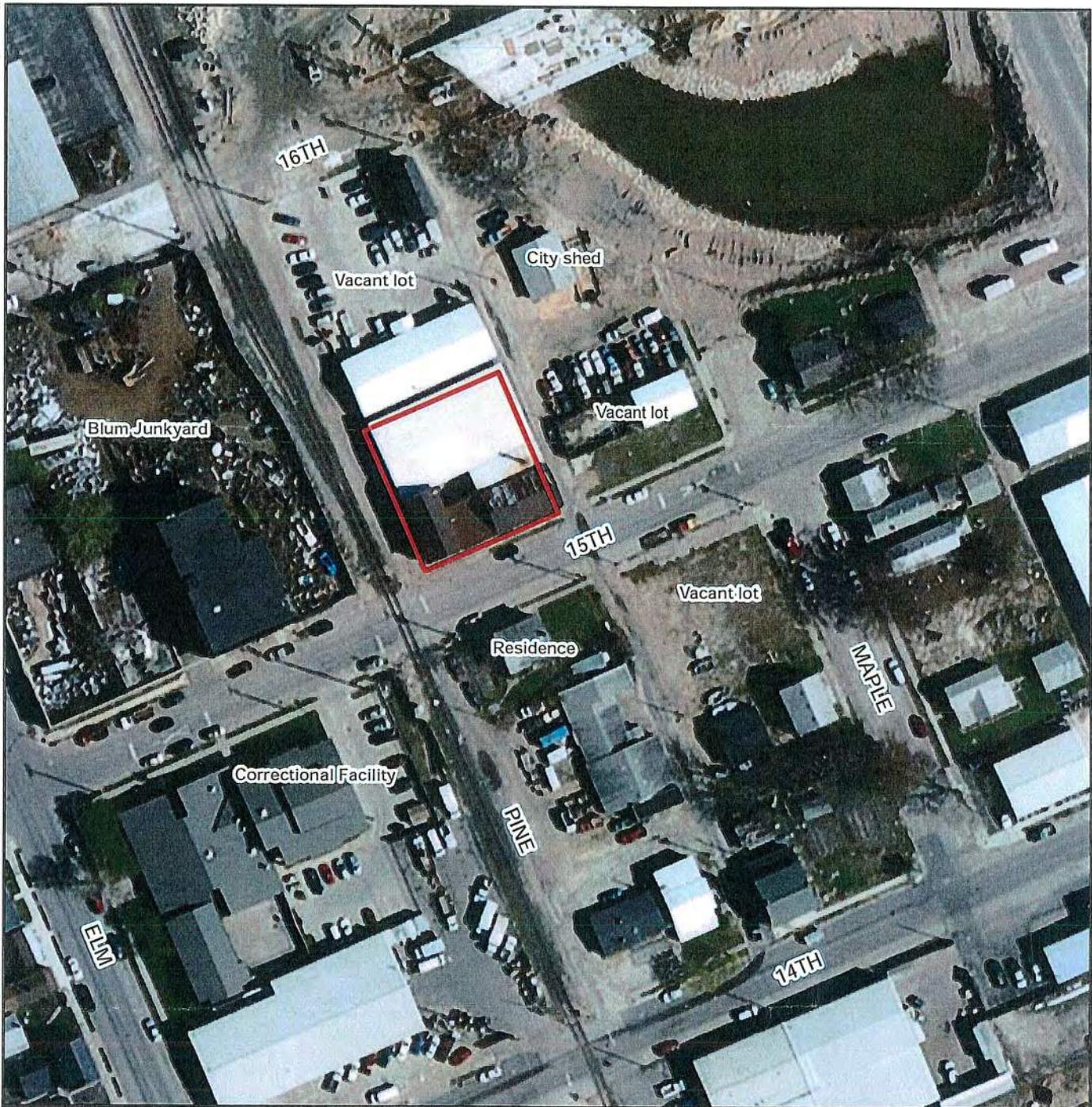
City of Dubuque
Dubuque County, Iowa



0 1,000 2,000
Feet

1 inch = 2,000 feet





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

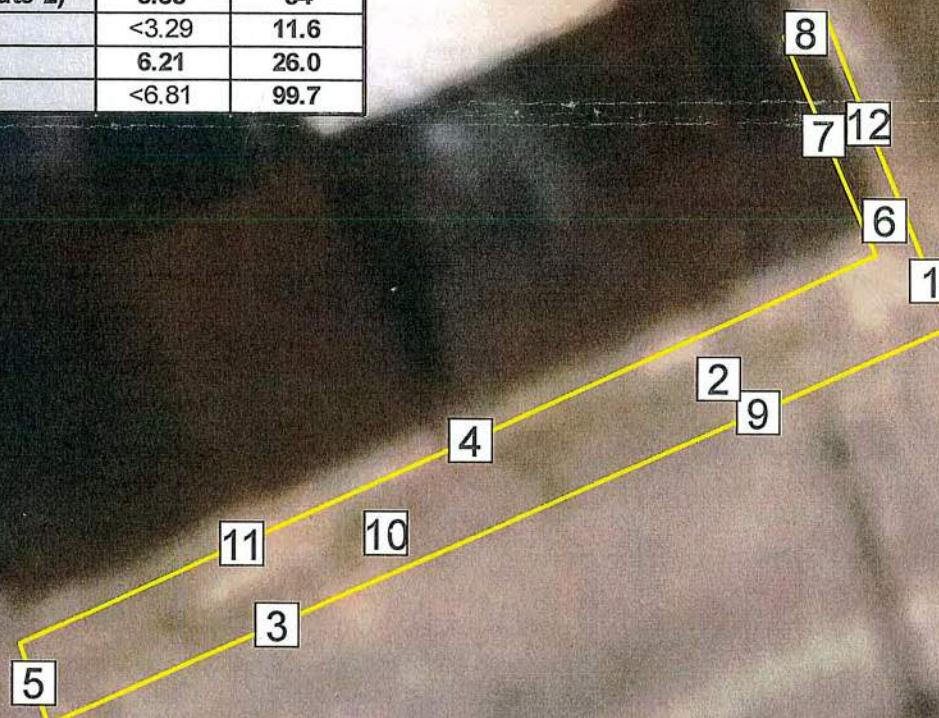


0 50 100 Feet

1 inch = 100 feet

HRG
HRGreen

Parameter	Arsenic	Lead
SWS	17	400
1	7.65	11.1
2 (Duplicate 1)	<3.60	18.2
3	<3.47	33.2
4	9.24	12.2
5	7.62	26.1
6	3.39	66.4
7	<3.38	5.12
8	<3.42	55.8
9 (Duplicate 2)	5.88	84
10	<3.29	11.6
11	6.21	26.0
12	<6.81	99.7



Legend

- Confirmation Sample Location
- Final Delineation Extent

THE CITY OF
DUBUQUE
Masterpiece on the Mississippi

Figure 3

Confirmation Sample Location Map

East Blum Property
501 East 15th Street

City of Dubuque
Dubuque County, Iowa



0 10 20
1 inch = 20 feet

HRG
HRGreen