

US EPA ARCHIVE DOCUMENT



STATE OF IOWA

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

DEPARTMENT OF NATURAL RESOURCES
JEFFREY R. VONK, DIRECTOR

December 23, 2005

RECEIVED

Diana Engeman
U. S. Environmental Protection Agency
Region VII
901 North 5th Street
Kansas City, Kansas 66101

JAN 03 2006

SUPERFUND DIVISION

Re: Technical Impracticability Evaluation Report for the Former People's Natural Gas Site, Dubuque, Iowa dated November 2005 (EPA ID# IAD980852578)

Dear Ms. Engeman:

The Iowa Department of Natural Resources, Contaminated Sites Section (Department), has completed the review of the Technical Impracticability (TI) Evaluation Report referenced above. Overall the Department agrees with MidAmerican Energy Company's evaluation of the groundwater plume characteristics, migration potential determination, and the ineffectiveness of recovery efforts relying on vapor extraction for coal tar related DNAPL groundwater contamination. As for the groundwater, the Department feels the development of an environmental covenant along with monitoring groundwater conditions for a specific period of time would be protective of human health.

The Department does have some reservations with leaving the amount of DNAPL impacted soil described in the TI evaluation report in place. Also the Department believes an additional potential remedial strategy should have been added that would demonstrate the feasibility of demolishing/replacing the current City of Dubuque Public Works Garage and temporary removal of the sanitary sewer force main. Maximum source removal should be the primary objective and would create the most affective remedy.

If you have any questions or need further information please feel free to call or e-mail at (515) 281-4171 or dan.cook@dnr.state.ia.us.

Sincerely,

Daniel Cook
Environmental Specialist Senior
Contaminated Sites Section

People's Nat. Gas
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