



Cleanup Report: Former YMCA – Phase 1A

Former YMCA Building – Phase 1A
480 South 3rd Street
Clinton, Iowa 52732

Prepared for:

City of Clinton	East Central Intergovernmental Association
611 South 3 rd Street	7600 Commerce Park
Clinton, Iowa 52732	Dubuque, Iowa 52002

Prepared by:

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1.0 Introduction

The City of Clinton (City) utilized a United States Environmental Protection Agency (EPA) Brownfields Revolving Loan Fund (RLF) Grant for the abatement of asbestos containing materials at the Former Young Men's Christian Association (YMCA) in Clinton. This project consisted of an emergency separation of the original building (Building A) of the Former YMCA from the remainder of structure and was Phase 1A of a three-phase project. This approach prevented further decay/deterioration of Building A and allows for Building A to be preserved and eventually remodeled into residential units. Asbestos abatement for this project consisted of regulated asbestos containing material (RACM) demolition as a structural engineer determined this portion of the Former YMCA structurally unsound.

As part of the project, an associated draft Analysis of Brownfields Cleanup Alternatives (ABC) report was made available for public comment. The Clinton City Council approved a resolution entering into an agreement with East Central Intergovernmental Association (ECIA) to use the agency's EPA Brownfield RLF funding on August 10, 2021 (Resolution 2021-542). The City then competitively procured Eocene Environmental Group, Inc. (Eocene), formerly known as Impact7G, Inc., for professional environmental services based on a Request for Proposal process. A contract was subsequently signed between the City and Eocene on March 12, 2024. The City later competitively procured RACM demolition (asbestos abatement) services through a public bid process. Dore & Associates, Inc. (Dore) of Bay City, Michigan was the lowest, most responsive bidder and entered into contract with the City on November 26, 2024. Contract documents between the City and Dore are included in Appendix M.

2.0 Background

The Former YMCA (Site) is located on an approximate 0.964-acre parcel at 480 South 3rd Street in downtown Clinton, Iowa. The Site including building additions are shown on a Structure Identification Map in Appendix A. The original building at the Site was built in 1905 with additions in 1961, 1978, and 1980. Up until 2010, the Site operated as a YMCA providing activities and programs for men and boys in the community. The Site was then utilized by the Victory Center, a local non-profit agency, to provide transitional rental housing to area men from 2010 to its closure in 2020. The Site has since remained vacant, deteriorating to become a health and safety threat to the neighborhood. Due to the difficulty finding buyers for the Site based on its size and declining condition, the City voluntarily acquired the Site to assist with the redevelopment process and prevent decay and subsequent demolition of the entire structure.

To accomplish the separation of Building A from the remainder of the structure, Building B1 and the portion of Building C1 immediately adjacent to Building A were removed entirely. The individual buildings associated with the Site are identified on the map in Appendix A. The demolished buildings, Building B1 and the portion of Building C1 immediately adjacent to Building A, are hereinafter referred to as the Project Location.

Utilizing ECIA's EPA Brownfields Assessment Grants, the City had asbestos surveys of all the building materials completed. Asbestos surveys were completed in 2021, 2022, and 2024 by three environmental consultants. The surveys followed OSHA Regulation 1926.1101 and 40 CFR Part 61 – National Emission Standards for Hazardous Air Pollutants (NESHAPs). Collectively, between all the surveys, a total of 407 building materials were analyzed for asbestos from all of the buildings at the Site, of which 71 tested positive. Asbestos containing materials (ACM) from Buildings B1 and C1 included cement board, air handler vibration cloth, roofing components, floor tile mastic, and thousands of square feet of floor tile. The Site has numerous entrances and a deteriorating roof. Even with the City routinely resecuring the Site, it presents a significant exposure pathway to the public and presents a challenge for the City staff to keep trespassers out. To permanently eliminate the potential exposure of asbestos to the public from the Project Location, the City requested and was approved for funding assistance from ECIA's U.S. EPA Brownfields RLF Grant to abate and properly dispose of asbestos containing materials. As the Project Location buildings were determined to be structurally unsound by a structural engineer, the majority of the debris was treated, removed, and disposed of as RACM. Metal components were washed and cleaned of asbestos debris and recycled as scrap.

Following completion of Phase 1A, conditions have mostly stabilized for the remaining structures. Building A is now a standalone structure with a next step of asbestos abatement to assist with renovation activities. The remaining building additions to the west of the Project Location (Buildings B2, B3, C2, and a portion of C1) will be demolished with debris treated as RACM to assist with redevelopment.

3.0 Project Design Development

The City selected its final project design based on a culmination of feedback received during meetings and conference calls with key stakeholders, site visits, and extensive community outreach initiatives. The following bullet points outline the City's detailed approach to gathering input.

- February 4, 2022 – City created a project website (www.cityofclintoniowa.gov/162/Former-YMCA-Brownfields-Cleanup) and distributed a survey to gather feedback from the public on the project.
- February 4, 2022 – City created and launched Site project website and disbursed survey to gather feedback from the public on the project.
- February 9, 2022 – Site revisioning flyers were circulated via email to the City's Choose Clinton Facebook page, LinkedIn website, and the City website.
- February 17, 2022 – The first Clinton Downtown Alliance focus meeting was conducted to update the public and downtown neighbors of the Site on revisioning and to gather feedback.
- February 22, 2022 – The *Clinton Herald* published an article about a focus meeting and upcoming public meetings regarding the site revision plan and site cleanup.

- February 24, 2022 – A second Clinton Downtown Alliance focus meeting was conducted to update the public and downtown neighbors of the Site on revisioning and to gather feedback.
- March 3, 2022 – A final Clinton Downtown Alliance focus meeting was conducted to update the public and downtown neighbors of the Site on revisioning and to gather feedback.
- March 15, 2022 – The City hosted a public meeting at City Hall to share environmental assessment investigation report findings.
- April 12, 2022 – The Community Involvement Plan was reviewed and approved by City Council.
- July 19, 2022 – Open house/public meeting hosted at City Hall to share initial site reuse plans with the public and solicit additional feedback.
- January 24, 2023 – Final plan was presented to the public and the City Council.
- August 12, 2024 – Updated ABCA posted on the City's project website.
- August 14, 2024 – The *Clinton Herald* published an article on the status of the project and notice of an upcoming public meeting.
- August 28, 2024 – City posted on Choose Clinton Facebook and City website project page regarding upcoming ABCA meeting.
- September 5, 2024 – ABCA presentation for the public hosted at City Hall.
- December 9, 2024 – City provided project update to the City's Historic Preservation Commission and solicited feedback.

In addition, the selected project design considered the “Asbestos Containing Materials Inspection” report dated May 24, 2024; final “Analysis of Brownfields Cleanup Alternatives (ABCA)” report dated October 2, 2024; “Data Quality Objectives & Site-Specific Quality Assurance Project Plan Asbestos Containing Materials Abatement and Mold Remediation” dated June 10, 2024; OHSA Safety and Health Standards (29 CFR 1910); and General Construction Standards (29 CFR 1926).

The project included two change orders. Based on the project schedule provided by Dore, additional days of oversight were needed by Eocene that was not covered in the original contract. Eocene provided a change order requesting funding for an additional 50 days of RACM demolition oversight. Dore provided a change order requesting additional funding based on the below project scope modifications:

- Dore to leave basement tank room in place (CREDIT)
 - Retain structural slab, basement walls, and tank
 - Requires minor concrete repair
- Dore to leave majority of basement slab floor in place (CREDIT)
- Dore to leave basement wall in place along hallway and along alleyway (CREDIT)

- Reduced amount of flowable fill required for the basement (CREDIT)
- Dore to brick in the portal and area at the bottom of the basement stairs (DEDUCT)
- Dore to construct exterior walls with 2' x 6' studs and sheathing (DEDUCT)

4.0 Cleanup Contractor Procurement

Plans and specifications for a public bid (Project Manual) were developed for asbestos abatement, consisting of RACM demolition, of Phase 1A of the Former YMCA (see Appendix N). A competitive procurement process was used to hire an asbestos abatement contractor for cleanup work on the Former YMCA. The Project Manual governing the RACM demolition asbestos abatement, which was made a part of a Specifications and Other Contract Documents book, and the proposed contract was on file with the City of Clinton, Office of the City Clerk at 611 South 3rd Street, Clinton, Iowa 52732; phone 563-242-2144. Hard copies of the Project Manual were made available by Eocene at 8951 Windsor Parkway Johnston, Iowa 50313; phone 515-473-6256. An electronic version of the Project Manual was also available from Eocene. Additionally, the Project Manual was available on the City's bidding platform: <https://cityofclintoniowa.ionwave.net>.

A mandatory pre-bid meeting and Site walkthrough was held at 9:00 A.M. on October 29, 2024. Bidders were required to sign an attendance form at the meeting.

Sealed proposals were publicly opened at 2:00 P.M. on November 7, 2024, in the Engineering Department, City of Clinton, 611 South 3rd Street, Clinton, Iowa 52732. Three bids were received, with the contract awarded to Dore, as they were the lowest most responsive bidder. The project bid results are included in Appendix O. Following award of the project, Dore provided the City with a certificate of insurance (see Appendix J).

5.0 RACM Demolition Asbestos Abatement

5.1 Inspection

Environmental Management Services of Iowa, Terracon Consultants, Inc, and Impact7G, Inc., completed Asbestos Containing Materials (ACM) Inspections at the Site between February 18 and March 2, 2021; October 21, 2021 and January 14, 2022; and April 29 and May 17, 2024 , respectively. The purpose of the ACM Inspections was to document the presence of asbestos containing materials within the Site. Collectively, between all the inspections, four hundred and seven (407) samples were collected from various building components within the Site's interior and exterior. Asbestos was detected in seventy-one (71) of the four hundred and seven (407) samples. ACMs from Buildings B1 and C1 include:

- 9" x 9" Floor Tile(s)
- 2' x 2' Cement Board
- Air Handler Vibration Cloth
- Built-Up Roof Layers
- 12" x 12" Floor Tile(s) and Mastic(s)

5.2 RACM Demolition Abatement

Prior to beginning RACM demolition abatement, Dore submitted the required 10-day notification to the Iowa DNR (see Appendix K). Dore's State of Iowa asbestos contractor permit is included in Appendix H and Dore staff State of Iowa Worker and Contractor/Supervisor licenses are included in Appendix I. Dore began the project on January 28, 2025 and completed all work associated with the project on May 15, 2025. Daily worker logs completed by Dore are included in Appendix L. RACM demolition of the Project Location began February 11, 2025 and was completed May 1, 2025. Eocene held a health and safety meeting each morning RACM demolition work was conducted. Signed health and safety forms are included in Appendix D.

In the course of the project, no local landfills were willing to accept metal components as asbestos waste. During a meeting on March 20, 2025, a representative from the Iowa Department of Natural Resources stated they will allow metal components associated with the Project Location to be cleaned of asbestos debris, allowing the waste to be diverted from a landfill and be recycled as scrap. The beams and other metal components were washed and all visible debris removed. An Iowa licensed asbestos contractor/supervisor from Eocene later inspected and signed off that the metal components were sufficiently cleaned. No sampling was conducted as part of the cleaning process. A visual clearance form was completed and signed by Eocene and Dore for documentation purposes. Following cleaning, the top one inch of soil where the metal components were stored and washed was scraped up and disposed of as asbestos waste. The table below shows the asbestos materials which were removed, including the asbestos content, quantity and the removal clearance dates, in addition to the amount of scrap metal recycled.

Asbestos Containing Materials, Quantities and Removal Clearance Date				
Material Description	Material Location	Asbestos Content	Quantity	Removal Clearance Date
9" x 9" Floor Tile	1961 Building – Basement, 1 st Floor, 2 nd Floor	1.2% Chrysotile	4,373 SF	5/1/2025
2' x 2' Cement Board	1961 Building – Basement	18-25% Chrysotile	8 SF	5/1/2025
Air Handler Vibration Cloth	1961 Building – 1 st Floor	20-50% Chrysotile	9 Each	5/1/2025
Built-Up Roof Layers	1961 Building – Roof Flashings	2-10% Chrysotile	520 LF	5/1/2025
12" x 12" Floor Tile(s) and Black Mastic(s)	1980 Building – 1 st Floor	Floor Tile: 2.8-12.2% Chrysotile Mastic: 1.1-3.5% Chrysotile	120 SF	5/1/2025

Asbestos Containing Materials, Quantities and Removal Clearance Date				
Material Description	Material Location	Asbestos Content	Quantity	Removal Clearance Date
RACM Debris	Building B1 and portion of Building C1	1.1-50% Chrysotile	1,272 Yards	5/1/2025
Recycled Metal Components, Quantities and Removal Date				
Scrap Metal	Building B1 and portion of Building C1	None	124,120 Pounds	5/1/2025

5.3 Visual Observation & Air Monitoring

Eocene provided air monitoring services and project observation during RACM demolition asbestos abatement activities that included the collection and analysis of field blanks as required by OSHA. Daily worker logs are included in Appendix C. Area air samples from the edge of the regulated area at the Project Location were collected and analyzed in order to document any potential asbestos fiber releases. These samples were analyzed via the Phase Contrast Microscopy (PCM) method. Due to the RACM demolition nature of the asbestos abatement, no final clearance air samples were collected at the Project Location.

Eocene conducted a final visual clearance survey once all RACM building debris was removed by Dore. The final visual clearance survey was conducted by Sky Delzell – a licensed asbestos inspector and contractor/supervisor – on May 1, 2025. Eocene State of Iowa Contractor/Supervisor licenses of staff who conducted oversight on the project are included in Appendix E. Remaining asbestos materials, dust, or debris were not observed in the areas of RACM demolition asbestos abatement during the final visual clearance. Therefore, the Project Location passed the visual clearance. Visual clearance inspection documentation is included in Appendix F.

Copies of all asbestos air monitoring results are included in Appendix B. Air monitoring consisted of area samples from around the perimeter of the Project Location. Field blank samples were also collected. No collected samples were analyzed above the permissible exposure limit (PEL) for asbestos at 0.1 fiber per cubic centimeter of air as an eight-hour time-weighted average (TWA). One of the area air samples collected on February 25, 2025 (filter damaged), two of the area air samples collected on March 4, 2025 (filters damaged), and one of the area air samples from April 23, 2025 (pump and sample stolen) were not readable. Negative exposure assessments were conducted for Dore workers during the project. Results of the assessments are also included in Appendix B.

ECIA conducted Davis-Bacon labor standards interviews and also reviewed certified payroll records.

6.0 Conclusions

Based on our observations it is our opinion that the identified asbestos containing materials have been removed from the Project Location. A total of 780.64 tons and an additional 136 cubic yards of asbestos containing materials were removed and disposed of as asbestos waste, and 124,120 pounds of metal were recycled as scrap. Waste shipment records are included in Appendix G. Air monitoring was conducted during cleanup and all results were below threshold limits. The Project Location cleanup is protective of human health and the environment and preservation of Building A is more likely since it has been separated from the Project Location. The Site is ready for Phase 1B.

Under Section V. Requirements of EPA Brownfield Cooperative Agreements, the evaluation of cleanup alternatives must consider the resilience of the remedial options to address potential adverse impacts caused by extreme weather events (e.g., sea level rise, increased frequency, and intensity of flooding, etc.). The alternatives may additionally consider the degree to which they reduce greenhouse gas discharges, reduce energy use or employ alternative energy sources, reduce volume of wastewater generated/disposed, reduce volume of materials taken to landfills, and recycle and re-use materials generated during the cleanup process to the maximum extent practicable. Clinton is located in the Midwest, where extreme rain events can occur within the Spring and Summer months. The roof of the Project Location was not intact and allowed precipitation into the building which was connected to Building A. With the Project Location demolished and separated from Building A, accumulation of precipitation is now less likely within Building A. Building A is now more protected from the elements and subsequent damage to the structure. If Building A were still connected to the Project Location, which was determined to be structurally unsound, a weather event such as heavy rain could have caused the Project Location to collapse and potentially affect the structural integrity of Building A. If Building A were to become structurally unsound it would need to be demolished as asbestos waste and the building would not be able to be remodeled into residential units. This would result in increased cost for asbestos debris disposal of the entirety of Building A instead of only the identified ACMs and would result in the loss of potential housing stock in the City.

7.0 Standard of Care

The services performed by Eocene Environmental Group, Inc. on this project have been conducted with a level of care and skill ordinarily exercised by reputable members of the profession, practicing in the same locality under similar budget and time constraints. No other warranty is expressed or implied.

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