Exhibit 9

Clyne, Gaye

From: Johnson, Mark
Sent: Monday, November 10, 2008 2:29 PM
To: 'Shiel.Daniel@epamail.epa.gov'
Cc: Peterson.Mary@epamail.epa.gov; Grenard, Frank (grenard@whitfieldlaw.com); Gary Norton (norton@whitfieldlaw.com); 'Gazi George'; Johnson, Mark; Williams, Brian
Subject: Southern Iowa Mechanical Site
Attachments: Untitled.PDF; Sample Collection Field Sheets.PDF

Dan, attached is my letter regarding this Site along with the enclosures. I also will send them to you by U.S. Mail. Please let me know if you have any questions.

Mark

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November 10, 2008

Daniel J. Shiel
Office of Regional Counsel
US EPA Region VII
901 North 5th Street
Kansas City, KS 66101

Re: Matters Relating to Southern Iowa Mechanical Property in Ottumwa, Iowa, and EPA's Response to FOIA Requests

Dear Dan:

We have reviewed the materials EPA provided to us on October 30, 2008, pursuant to our Freedom of Information Act requests dated October 6 and October 17, 2008. These documents have confirmed our previously stated belief that EPA has erroneously multiplied by 100 the laboratory results of the samples taken at the Southern Iowa Mechanical ("SIM") property in Ottumwa, Iowa, on May 16, 2008. It is only by reason of this erroneous 100-fold increase that the reported results exceed the applicable action levels. These erroneously manipulated laboratory results provide no valid basis for any administrative action in connection with the SIM property. I formally request that you include this letter and each of the attached exhibits in the administrative record for this matter, and that EPA consider this letter and each of the attached exhibits before taking any administrative action with regard to this matter.

This conclusion is based on the following findings from your FOIA response.

(1) First, the "Sample Collection Field Sheet" for each of the wipe samples numbered 109 through 121 states that the "wipe area" for each sample was 100 square centimeters (copies of each of these Sample Collection Field Sheets were produced by EPA last week in response to our FOIA request, and are attached to this letter as Exhibits 1 through 13).

(2) Similarly, in the May 30, 2008, report of sample analysis results for ARS # 3867 at the SIM property (the "EPA report"), page 3 of 11 states, in the column headed "Location Description," that the "sample area" for the wipe samples numbered 109 through 121 was 100 square centimeters.

(3) Wipe samples are taken over a 100 square centimeter area because the TSCA action level for PCBs is 10 micrograms per 100 square centimeters.

(4) Pages 8 through 11 of the EPA report state the detected quantities (if any) of various PCB Aroclors in the various wipe samples, numbered 109 through 121. These pages state that each of the samples were analyzed by "GC/EC" (gas chromatography/electron capture) – a process by which the sampled compounds are extracted from the wipe sampling cloth, and injected into the GC port. A GC/EC device does not "know" – and is not concerned with – the size of area from which sampled compounds were collected. A GC/EC device merely reports a laboratory value for the concentration of a particular compound extracted from the wipe cloth. That reported value of concentration is for the total area over which the sampling cloth was wiped – regardless of whether the sampled area was 1 square centimeter, 100 square centimeters, or 1,000 square centimeters.

(5) The erroneous manipulation of the laboratory results appears to have originated in communications between Lorraine Iverson and Mary Peterson, which is reflected, at least in part, in Ms. Iverson's May 27, 2008, email to Ms. Peterson, which EPA produced to us last week in response to our FOIA request. A copy of this email is attached to this letter as Exhibit 14. In this email, Ms. Iverson states:

"Our LIMS [laboratory information management system] system accepts results for wipe samples in only micrograms per square centimeter. If you require the results in micrograms per 100 square centimeters, I'll be happy to put those results in the comments section of the LIMS report. It will be a simple calculation of multiplying the LIMS results in micrograms/cm2 by 100."

(6) Ms. Iverson's statement that EPA's "LIMS system accepts results for wipe samples in only micrograms per square centimeter," is confusing and unclear. First, it is confusing why EPA – which is responsible for enforcing TSCA limits which are stated in concentrations per 100 square centimeters – purportedly uses a system which reports results in concentrations per square centimeter. Nonetheless, if Ms. Iverson's statement meant that she believes that the EPA's system reports all of the compounds collected from whatever size sample area as if it were concentrated into one square centimeter, then the correct calculation for determining the true distribution of the compound over the total sampled area would be to **divide** the reported value by the total area sampled.

(7) However, if what Ms. Iverson meant by her statement was merely that the LIMS system is programmed to print the unit for all reported values as micrograms per one square centimeter, regardless of the actual sampling area from which the tested compounds were collected, then the proper "correction" would have been to state that the reported results were collected from 100-square-centimeter sample areas. We

> believe this interpretation of Ms. Iverson's statement is most likely, in part because we asked, in our October 17, 2008 FOIA request, that EPA provide us with the applicable laboratory procedures, protocols or guidelines that explain why lab values for 100-square-centimeter wipe samples were purportedly reported in values per square centimeter, and had to be multiplied by 100 in order to reflect the results for a standard 100 square centimeter sample. In its October 30, 2008, response to our FOIA request, EPA did not produce any such laboratory procedures, protocols or guidelines. We think it would be highly unlikely that EPA would routinely manipulate reported laboratory results without clearly stated guidelines or protocols.

For each of these reasons, we believe that EPA erroneously multiplied by 100 each of the GC/EC analysis results of the wipe samples. If EPA had not erroneously manipulated this data, none of the reported results would have been above the TSCA action levels. Consequently, we believe that any administrative actions based on this erroneous and manipulated data would be without basis and arbitrary and capricious.

Furthermore, as I have explained in my previous letters to you on this matter, there is no factual or legal basis for concluding that either Dico, Inc. ("Dico") or Titan Tire Corporation ("Titan Tire") acting on behalf of Dico, incurred any liability as a "covered person" under section 107(a) of CERCLA, 42 U.S.C. § 9607(a), by selling various Dico buildings to SIM for the purpose of disassembling the buildings, re-locating them to SIM's property in Ottumwa, and re-assembling them as commercial buildings on SIM's property. During our conference call on October 16, 2008, you stated that EPA understands that SIM purchased the various Dico buildings for the purpose of re-assembling the buildings on the SIM property. As stated in my October 2 and October 17, 2008, letters to you, by selling these commercially-useful buildings to SIM for more than $150,000, Dico and/or Titan Tire acting on behalf of Dico, did not arrange for the disposal of any hazardous substance.

After SIM purchased and disassembled the Dico buildings at various times between 2004 and 2007, neither Dico nor Titan Tire has had any control over, or access to, the buildings which SIM relocated to its property in Ottumwa. The only indirect access which Dico has had was on October 8, 2008, when SIM agreed to permit me and my consultants access to the property for the purpose of conducting our own sampling and site investigation. Other than EPA's representatives in May 2008, and SIM's employees, we do not know whether anyone else has had any access to the building components since they were removed from Dico's property, or what changes have been made to the former Dico buildings since they have been disassembled and re-located to the SIM property.

Given the lack of any credible or valid evidence to support the EPA's position with respect to the SIM property, I am not at liberty to provide to you copies of any of the reports or laboratory results prepared by my consultants with regard to their investigation of the SIM property. Nonetheless, as I have previously stated, my clients remain fully willing to cooperate with EPA in negotiations relating to the SIM property. To that end, and without waiving any of the attorney-client and/or work product privileges protecting my consultants' work on my behalf, I will summarize their findings as follows.

Just as the EPA found in the sampling it conducted in May 2008, numerous soil samples taken by my consultants demonstrated that there has been no release of PCBs into the soil beneath or surrounding the structural steel beams in the three staging areas where they are awaiting re-assembly. In fact, there is no evidence of a release of any hazardous substances into the air, water or soil at the SIM property from any of these building components, and no evidence of any threatened release of any hazardous substance.

During our inspection, we observed a small quantity of tape-backing to insulation either attached to, or among the steel beams. The total quantity of tape-backing is estimated to be small enough to fit inside a five-gallon container. The tape-backing was attached to the unpainted surface of a small number of steel beams. Some PCBs were found in samples of this tape-backing and in wipe samples from the non-porous, unpainted beam areas where the tape had been removed. However, the Aroclors found in these samples were different from the Aroclors reported by Eckenfelder in 1992 from sampling conducted in certain Dico buildings.[1]

Based upon these sampling results and our observations of the limited amount of tape-backing to insulation found among the structural steel beams on the SIM property, we believe that the remediation process contemplated by the EPA's proposed administrative settlement agreement is excessive, unwarranted, and dangerous. EPA wants to subject all of the structural steel beams to a scarification process, which is comparable to sand-blasting. This process is very expensive, and releases large quantities of dust and contaminant particles into the air. Given the very small areas in which any PCBs have been detected – none of which are above action levels in the EPA report, but for the erroneous manipulation of the data by 100-fold – there is no justification for such an expensive and potentially hazardous remedy when an equally effective remedy is available which is far less expensive and much safer, both to the environment and to the people who might be exposed to the remediation process.

The EPA tests show that a beam cleanup is not required or necessary. But, in the interest of resolving this matter, we believe that the most appropriate remedy would be the following:

(1) All tape and attached, non-metallic materials found within the three piles of beams would be carefully removed and packed into a suitable PCB container that would be labeled accordingly and manifested for incineration in a TSCA-licensed and EPA-approved incinerator;

(2) Each beam should be individually lifted, inspected, and all areas that display tape residues should be highlighted for subsequent cleaning with an appropriate solvent wash;

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[1] This discrepancy between the PCB Aroclors reportedly detected in Dico buildings in 1992, and the PCB Aroclors identified in both the 2008 EPA sampling results and my consultant's sampling results of tape-backing to insulation found among the steel beams on the SIM property, shows that the chemical "DNA" of the materials found in these two different locations does not match. As you know, PCBs are highly stable compounds which do not change from one Aroclor to another over time. Since the chemical "DNA" does not match, we have serious concerns that the small quantities of tape-backing to insulation found among the steel beams on the SIM property in Ottumwa did not come from the buildings sold by Dico in Des Moines.

(3) Identified and highlighted portions of beams which have been previously in contact with liquid PCBs in the adhesive backing or tape attaching insulation to the beams would be decontaminated in compliance with the standards and procedures specified in 40 C.F.R. § 761.79 for non-porous surfaces previously in contact with liquid PCBs. Although no decontamination is required in this case because the EPA tests show results below the TSCA threshold, 761.79 decontamination procedure would be utilized to remove, using solvent washing, any residual PCBs;

(4) Decontamination of identified portions of beams would be conducted with a suitable solvent (such as kerosene) on a specially-lined location to capture all solvents and removed PCBs, and to avoid spills;

(5) Although unnecessary because the EPA tests show results below the TSCA threshold, all solvent residues and cloths used in the decontamination process would be commingled with the tape material, labeled as PCB waste > 50 PPM, and shipped for incineration to a TSCA-licensed and EPA-approved incinerator;

(6) A detailed report would be issued to EPA by the contractor performing the decontamination, including verification of all site activities and copies of all manifests for incineration.

We believe that the solvent wash process described above is most appropriate in this case because the unpainted portions of the beams which have been in contact with the adhesive tape residue are non-porous surfaces, within the meaning of the TCSA regulations. The PCBs of concern were apparently part of the liquid or viscous formulation of the adhesive backing to the tape which may have been sprayed on the insulation in order to attach it to the unpainted beams. Consequently, the decontamination standard and procedures for non-porous surfaces previously in contact with liquid PCBs specified in 40 C.F.R. § 761.79(b)(3) is most applicable. Approved procedures under 40 C.F.R. § 761.79(b) include "the use of abrasives or solvents ... to remove or separate PCB ... from non-porous surfaces." Use of these approved procedures would be more efficient and cost-effective than scarification, and would reduce the risk of releasing PCBs into the atmosphere which would be presented by scarification. Furthermore, the solvent washing process is also authorized as an alternative method under 40 C.F.R. § 761.79(c).

We look forward to discussing these matters with you. Please let me know if you have any questions.

Sincerely,

STINSON MORRISON HECKER LLP

Mark E. Johnson

cc: Frank Grenard
Gary Norton

Sample Collection Field Sheet
US EPA Region 7
Kansas City, KS

ASR Number: 3867 **Sample Number:** 109 **QC Code:** __ **Matrix:** Waste **Tag ID:** 3867-109-__

Project ID: MP072504 **Project Manager:** Mary Peterson
Project Desc: Des Moines TCE Site Insulation and wipe sampling
City: Des Moines **State:** Iowa
Program: Superfund
Site Name: 0725 DES MOINES TCE - SOUTH POND/DRAINAGE AREA **Site ID:** 0725 **Site OU:** 04

Location Desc: Wipe sample (wipe area: 100 unit: CM^2)

External Sample Number: _____

Expected Conc: (or Circle One: (Low) Medium High) **Date** **Time(24 hr)**

Latitude: 41.66982 **Sample Collection: Start:** 5/16/8 12:25
Longitude: 92-46237 **End:** 5/16/8 15:47

Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	14 Days	1 PCBs in Wipe Samples by GC/EC

Sample Comments:
(N/A)

Sample Collected By: MP/TC

Exhibit 1

Sample Collection Field Sheet
US EPA Region 7
Kansas City, KS

ASR Number: 3867 **Sample Number:** 110 **QC Code:** __ **Matrix:** Waste **Tag ID:** 3867-110-__

Project ID: MP072504 **Project Manager:** Mary Peterson
Project Desc: Des Moines TCE Site Insulation and wipe sampling
City: Des Moines **State:** Iowa
Program: Superfund
Site Name: 0725 DES MOINES TCE - SOUTH POND/DRAINAGE AREA **Site ID:** 0725 **Site OU:** 04

Location Desc: Wipe sample (wipe area: 100 unit: CM^2)

External Sample Number: _____

Expected Conc: (or Circle One: Low Medium High)

			Date	Time(24 hr)
Latitude:	41.06982	**Sample Collection: Start:**	5/16/E	12:36
Longitude:	92-40237	**End:**	5/16/E	15:47

Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	14 Days	1 PCBs in Wipe Samples by GC/EC

Sample Comments:
(N/A)

Sample Collected By: MP/TC

Exhibit 2

D0460

Sample Collection Field Sheet
US EPA Region 7
Kansas City, KS

ASR Number: 3867 **Sample Number:** 111 **QC Code:** __ **Matrix:** Waste **Tag ID:** 3867-111-__

Project ID: MP072504 **Project Manager:** Mary Peterson
Project Desc: Des Moines TCE Site Insulation and wipe sampling
City: Des Moines **State:** Iowa
Program: Superfund
Site Name: 0725 DES MOINES TCE - SOUTH POND/DRAINAGE AREA **Site ID:** 0725 **Site OU:** 04

Location Desc: Wipe sample (wipe area: 100 unit: CM^2)

External Sample Number: _____

Expected Conc: (or Circle One: Low Medium High)

			Date	Time(24 hr)
Latitude:	41.06982	**Sample Collection: Start:**	5/16/E	12:49
Longitude:	92-46237	**End:**	5/16/8	15:37

Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	14 Days	1 PCBs in Wipe Samples by GC/EC

Sample Comments:
(N/A)

Sample Collected By: MP/TC

Exhibit 3

D0461

Sample Collection Field Sheet
US EPA Region 7
Kansas City, KS

ASR Number: 3867 **Sample Number:** 112 **QC Code:** __ **Matrix:** Waste **Tag ID:** 3867-112-__

Project ID: MP072504 **Project Manager:** Mary Peterson
Project Desc: Des Moines TCE Site Insulation and wipe sampling
City: Des Moines **State:** Iowa
Program: Superfund
Site Name: 0725 DES MOINES TCE - SOUTH POND/DRAINAGE AREA **Site ID:** 0725 **Site OU:** 04

Location Desc: Wipe sample (wipe area: 100 unit: cm²)

External Sample Number: _____

Expected Conc: (or Circle One: (Low) Medium High)

			Date	Time(24 hr)
Latitude:	41.06982	**Sample Collection: Start:**	5/16/E	12:53
Longitude:	92.40237	**End:**	5/16/E	15:37

Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	14 Days	1 PCBs in Wipe Samples by GC/EC

Sample Comments:

(N/A)

Sample Collected By: MP/TC

Exhibit 4

D0462

Sample Collection Field Sheet
US EPA Region 7
Kansas City, KS

ASR Number: 3867 **Sample Number:** 113 **QC Code:** __ **Matrix:** Waste **Tag ID:** 3867-113-__

Project ID: MP072504 **Project Manager:** Mary Peterson
Project Desc: Des Moines TCE Site Insulation and wipe sampling
City: Des Moines **State:** Iowa
Program: Superfund
Site Name: 0725 DES MOINES TCE - SOUTH POND/DRAINAGE AREA **Site ID:** 0725 **Site OU:** 04

Location Desc: Wipe sample (wipe area: 100 unit: cm^2)

External Sample Number: _____

Expected Conc: (or Circle One: Low Medium High)

			Date	Time(24 hr)
Latitude:	41.06982	**Sample Collection: Start:**	5/16/2	13:02
Longitude:	92.46237	**End:**	5/16/6	15:37

Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	14 Days	1 PCBs in Wipe Samples by GC/EC

Sample Comments:

(N/A)

Sample Collected By: MP/TC

Exhibit 5

Sample Collection Field Sheet
US EPA Region 7
Kansas City, KS

ASR Number: 3867 **Sample Number:** 114 **QC Code:** __ **Matrix:** Waste **Tag ID:** 3867-114-__

Project ID: MP072504 **Project Manager:** Mary Peterson
Project Desc: Des Moines TCE Site Insulation and wipe sampling
City: Des Moines **State:** Iowa
Program: Superfund
Site Name: 0725 DES MOINES TCE - SOUTH POND/DRAINAGE AREA **Site ID:** 0725 **Site OU:** 04

Location Desc: Wipe sample (wipe area: 100 unit cm^2)

External Sample Number: _____

Expected Conc: (or Circle One: Low Medium High)

			Date	Time(24 hr)
Latitude:	41.06982	**Sample Collection: Start:**	5/16/E	13:09
Longitude:	92.40237	**End:**	5/16/E	15:31

Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	14 Days	1 PCBs in Wipe Samples by GC/EC

Sample Comments:

(N/A)

Sample Collected By: MP/TC

Exhibit 6

D0464

Sample Collection Field Sheet
US EPA Region 7
Kansas City, KS

ASR Number: 3867 **Sample Number:** 115 **QC Code:** __ **Matrix:** Waste **Tag ID:** 3867-115-__

Project ID: MP072504 **Project Manager:** Mary Peterson
Project Desc: Des Moines TCE Site Insulation and wipe sampling
City: Des Moines **State:** Iowa
Program: Superfund
Site Name: 0725 DES MOINES TCE - SOUTH POND/DRAINAGE AREA **Site ID:** 0725 **Site OU:** 04

Location Desc: Wipe sample (wipe area: 100 unit: CM^2)

External Sample Number: _____

Expected Conc: (or Circle One: (Low) ~~Medium~~ High)

			Date	Time(24 hr)
Latitude:	41.06982	**Sample Collection: Start:**	5/16/E	13:17
Longitude:	92.40237	**End:**	5/16/E	15:37

Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	14 Days	1 PCBs in Wipe Samples by GC/EC

Sample Comments:
(N/A)

Sample Collected By: MP/TC

Exhibit 7

D0465

Sample Collection Field Sheet
US EPA Region 7
Kansas City, KS

ASR Number: 3867 **Sample Number:** 116 **QC Code:** __ **Matrix:** Waste **Tag ID:** 3867-116-__

Project ID: MP072504 **Project Manager:** Mary Peterson
Project Desc: Des Moines TCE Site Insulation and wipe sampling
City: Des Moines **State:** Iowa
Program; Superfund
Site Name: 0725 DES MOINES TCE - SOUTH POND/DRAINAGE AREA **Site ID:** 0725 **Site OU:** 04

Location Desc: Wipe sample (wipe area: 100 unit: cm^2)

External Sample Number: _____

Expected Conc: (or Circle One: ~~Low~~ Medium High)

			Date	Time(24 hr)
Latitude:	41.06982	**Sample Collection: Start:**	5/16/12	13:25
Longitude:	92.48237	**End:**	5/16/12	15:37

Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	14 Days	1 PCBs in Wipe Samples by GC/EC

Sample Comments:
(N/A)

Sample Collected By: MP/TC

Exhibit 8

D0466

Sample Collection Field Sheet

US EPA Region 7
Kansas City, KS

ASR Number: 3867 **Sample Number:** 117 **QC Code:** __ **Matrix:** Waste **Tag ID:** 3867-117-__

Project ID: MP072504 **Project Manager:** Mary Peterson
Project Desc: Des Moines TCE Site Insulation and wipe sampling
City: Des Moines **State:** Iowa
Program: Superfund
Site Name: 0725 DES MOINES TCE - SOUTH POND/DRAINAGE AREA **Site ID:** 0725 **Site OU:** 04

Location Desc: Wipe sample (wipe area: 100 unit: CM^2)

External Sample Number: _____

Expected Conc: (or Circle One: Low Medium High)

			Date	Time(24 hr)
Latitude:	41.06902	**Sample Collection: Start:**	5/16/E	13:24
Longitude:	92.40237	**End:**	__/__/__	__:__

Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	14 Days	1 PCBs in Wipe Samples by GC/EC

Sample Comments:

(N/A)

Sample Collected By: MP/TC

Exhibit 9

D0467

Sample Collection Field Sheet
US EPA Region 7
Kansas City, KS

ASR Number: 3867 **Sample Number:** 118 **QC Code:** __ **Matrix:** Waste **Tag ID:** 3867-118-__

Project ID: MP072504 **Project Manager:** Mary Peterson
Project Desc: Des Moines TCE Site Insulation and wipe sampling
City: Des Moines **State:** Iowa
Program: Superfund
Site Name: 0725 DES MOINES TCE - SOUTH POND/DRAINAGE AREA **Site ID:** 0725 **Site OU:** 04

Location Desc: Wipe sample (wipe area: 100 unit: CM^2)

External Sample Number: _____

Expected Conc: (or Circle One: Low Medium High)

			Date	Time(24 hr)
Latitude:	41.06982	**Sample Collection: Start:**	5/16/6	13:45
Longitude:	92.40237	**End:**	5/16/6	15:37

Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	14 Days	1 PCBs in Wipe Samples by GC/EC

Sample Comments:
(N/A)

Sample Collected By: MP/TC

Exhibit 10

D0468

Sample Collection Field Sheet
US EPA Region 7
Kansas City, KS

ASR Number: 3867 **Sample Number:** 119 **QC Code:** __ **Matrix:** Waste **Tag ID:** 3867-119-__

Project ID: MP072504 **Project Manager:** Mary Peterson
Project Desc: Des Moines TCE Site Insulation and wipe sampling
City: Des Moines **State:** Iowa
Program: Superfund
Site Name: 0725 DES MOINES TCE - SOUTH POND/DRAINAGE AREA **Site ID:** 0725 **Site OU:** 04

Location Desc: Wipe sample (wipe area: 100 unit: CM^2)

External Sample Number: _____

Expected Conc: (or Circle One: Low Medium High)

		Date	Time(24 hr)
Latitude: 41.06482	**Sample Collection: Start:**	5/16/12	13:52
Longitude: 92.46237	**End:**	5/16/12	15:37

Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	14 Days	1 PCBs In Wipe Samples by GC/EC

Sample Comments:
(N/A)

Sample Collected By: MP/TC

Exhibit 11

D0469

Sample Collection Field Sheet
US EPA Region 7
Kansas City, KS

ASR Number: 3867 **Sample Number:** 120 **QC Code:** __ **Matrix:** Waste **Tag ID:** 3867-120-__

Project ID: MP072504 **Project Manager:** Mary Peterson
Project Desc: Des Moines TCE Site Insulation and wipe sampling
City: Des Moines **State:** Iowa
Program: Superfund
Site Name: 0725 DES MOINES TCE - SOUTH POND/DRAINAGE AREA **Site ID:** 0725 **Site OU:** 04

Location Desc: Wipe sample (wipe area: 100 unit: cm^2)

External Sample Number: _____

		Date	Time(24 hr)
Expected Conc:	(or Circle One: Low Medium High)		
Latitude: 41.06982	**Sample Collection: Start:**	5/16/E	14:03
Longitude: 92.40237	**End:**	5/16/E	15:37

Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
1 - 8 oz glass	4 Deg C	14 Days	1 PCBs in Wipe Samples by GC/EC

Sample Comments:
(N/A)

Sample Collected By: MP/TC

Exhibit 12

D0470

Sample Collection Field Sheet

US EPA Region 7
Kansas City, KS

ASR Number: 3867 **Sample Number:** ~~101~~ 121 **QC Code:** __ **Matrix:** Waste **Tag ID:** 3867-~~101~~ 121-__

Project ID: MP072504 **Project Manager:** Mary Peterson
Project Desc: Des Moines TCE Site Insulation and wipe sampling
City: Des Moines **State:** Iowa
Program: Superfund
Site Name: 0725 DES MOINES TCE - SOUTH POND/DRAINAGE AREA **Site ID:** 0725 **Site OU:** 04

Location Desc: Wipe sample (wipe area: 100 unit: cm^2)

External Sample Number: _____

Expected Conc: (or Circle One: Low Medium High)

			Date	Time(24 hr)
Latitude:	41.06962	**Sample Collection: Start:**	5/16/E	14:22
Longitude:	92.40237	**End:**	5/16/E	15:37

Laboratory Analyses:

Container	Preservative	Holding Time	Analysis
2 - 8 oz glass	4 Deg C	14 Days	1 PCBs in Wipe Samples by GC/EC

Sample Comments:
(N/A)

2 = Extra jars for MS/MSD. m 5/19 108.m

Sample Collected By: MP/TC

Exhibit 13

D0471

Lorraine Iverson/R7/USEPA/US
05/27/2008 02:06 PM

To Mary Peterson/SUPR/R7/USEPA/US@EPA
cc
bcc
Subject Re: Fw: ASR 3867 PCBs

It is, of course, not your fault that the instrument couldn't handle the sample extracts! I only hope everyone handling that insulation was wearing gloves.

I will get the data to you as quickly as I can, but I have informed my boss that it will likely be Friday before I have usable results.

Lorraine

Mary Peterson/SUPR/R7/USEPA/US

Mary Peterson/SUPR/R7/USEPA/US
05/27/08 12:30 PM

To Lorraine Iverson/R7/USEPA/US@EPA
cc
Subject Re: Fw: ASR 3867 PCBs

Thanks Lorraine. I understand the conversion, but I am trying to avoid confusion with the responsible party we are dealing with and the public as well. Since the TSCA levels we will be comparing these results with are expressed in ug/100 cm2, it would be best to have the results expressed in the same units. Whatever you can do to report results in these units would be really helpful. Obviously, for the soil samples and the insulation sample (#9), mg/kg is the appropriate reporting unit. Thanks for all your help on this. Sorry for blowing your instrument. I did not expect to find the beams covered with insulation; nor did I expect to find actual bulk insulation at the site.
Mary

Lorraine Iverson/R7/USEPA/US

Lorraine Iverson/R7/USEPA/US
05/27/2008 12:22 PM

To Mary Peterson/SUPR/R7/USEPA/US@EPA
cc Daksha Dalal/R7/USEPA/US@EPA
Subject Re: Fw: ASR 3867 PCBs

Our LIMS system accepts results for wipe samples in only micrograms per square centimeter. If you require the results in micrograms per 100 square centimeters, I'll be happy to put those results in the comments section of the LIMS report. It will be a simple calculation of multiplying the LIMS results in micrograms/cm2 by 100.

I'll check to see if there is a more formal and tabular way to report your results the way you requested.

Lorraine

Mary Peterson/SUPR/R7/USEPA/US

Exhibit 14