

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 RENNER BOULEVARD
LENEXA, KANSAS 66219**

In the Matter of:)
)
DCW Casing LLC,) **Docket No. RCRA-07-2021-0052**
)
)
Respondent.)
_____)

CONSENT AGREEMENT AND FINAL ORDER

PRELIMINARY STATEMENT

The U.S. Environmental Protection Agency (EPA), Region 7 (“Complainant”) and DCW Casing LLC (“Respondent”) have agreed to a settlement of this action before the filing of a complaint, and thus this action is simultaneously commenced and concluded pursuant to Rules 22.13(b) and 22.18(b)(2) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (“Consolidated Rules of Practice”), 40 Code of Federal Regulations (“C.F.R.”) §§ 22.13(b) and 22.18(b)(2).

ALLEGATIONS

Jurisdiction

1. This administrative action is being conducted pursuant to Sections 3008(a) and (g) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 (“RCRA”), and the Hazardous and Solid Waste Amendments of 1984, 42 U.S.C. §§ 6928(a) and (g), and in accordance with the Consolidated Rules of Practice.

2. This Consent Agreement and Final Order serves as notice that the EPA has reason to believe that Respondent violated Section 3005 of RCRA, 42 U.S.C § 6925, and the regulations promulgated thereunder.

Parties

3. Complainant is the Chief of the Chemical Branch, Enforcement and Compliance Assurance Division, Region 7, as duly delegated by the Administrator of EPA.

4. Respondent is DCW Casing LLC, a corporation incorporated in the state of Delaware and authorized to operate in the State of Iowa.

Statutory and Regulatory Framework

5. RCRA was enacted to address the volumes of municipal and industrial solid waste generated nationwide in order to protect human health and the environment from potential hazards of waste disposal, conserve energy and natural resources, reduce the amount of waste generated, and ensure that wastes are managed in an environmentally sound manner.

6. RCRA provides guidelines for a waste management program and provides EPA with the authorities found in Sections 3001, 3002 and 3005 of RCRA, 42 U.S.C. §§ 6921, 6922 and 6925, to develop and promulgate specific requirements in order to implement the waste management program. Pursuant to these authorities, EPA promulgated the waste management regulations found at 40 C.F.R. Part 239 through Part 282.

7. Section 3001 of RCRA, 42 U.S.C. § 6921, requires the Administrator to develop and promulgate criteria for identifying the characteristics of hazardous waste, and for listing hazardous waste, which should be subject to the provisions of this subchapter, taking into account toxicity, persistence, and degradability in nature, potential for accumulation in tissue, and other related factors such as flammability, corrosiveness, and other hazardous characteristics.

8. Section 3002 of RCRA, 42 U.S.C. § 6922, requires the Administrator to promulgate regulations establishing such standards, applicable to generators of hazardous waste identified or listed under this subchapter, as may be necessary to protect human health and the environment.

9. Section 3005 of RCRA, 42 U.S.C. § 6925, requires the Administrator of EPA to promulgate regulations requiring each person owning or operating an existing facility or planning to construct a new facility for the treatment, storage, or disposal of hazardous waste identified or listed under this subchapter to have a permit.

10. Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), defines “person” as an individual, trust, firm, joint stock company, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, or any interstate body and shall include each department, agency, and instrumentality of the United States.

11. The regulation at 40 C.F.R. § 260.10 defines “operator” as the person responsible for the overall operation of a facility.

12. The regulation at 40 C.F.R. § 260.10 defines “owner” as the person who owns a facility or part of a facility.

13. The regulation at 40 C.F.R. § 260.10 defines “facility” to include all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste, or for managing hazardous secondary materials prior to reclamation. A facility may consist of several treatment, storage or disposal operational units (e.g. one or more landfills, surface impoundments, or combinations of them).

14. The regulation at 40 C.F.R. § 260.10 defines “treatment” as any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amendable for recovery, amendable for storage, or reduced in volume.

15. The regulation at 40 C.F.R. § 260.10 defines “storage” as the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere.

16. The regulation at 40 C.F.R. § 260.10 defines “disposal” as the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.

17. “Solid waste” is defined at 40 C.F.R. § 261.2.

18. “Hazardous waste” is defined at 40 C.F.R. § 261.3.

19. The regulation at 40 C.F.R. § 260.10 defines “generator” as any person, by site, whose act or process produces hazardous waste identified or listed in part 261 of this chapter or whose act first causes a hazardous waste to become subject to regulation.

20. The regulation at 40 C.F.R. § 260.10 defines “large quantity generator” as a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste or greater than 1 kilogram (2.2 pounds) of acute hazardous waste listed in 40 C.F.R. §§ 261.31 or 261.33(e).

21. Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), whenever on the basis of any information the EPA determines that any person has violated or is in violation of any requirement of RCRA, the EPA may issue an order assessing a civil penalty for any past or current violation and/or require immediate compliance or compliance within a specified time period.

22. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), authorizes a civil penalty of not more than \$25,000 per day for violations of Subchapter III of RCRA (Hazardous Waste Management). The Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, 28 U.S.C. § 2461, and implementing regulations at 40 C.F.R. Part 19, increased these statutory maximum penalties to \$76,764 for violations that occur after November 2, 2015, and for which penalties are assessed on or after December 23, 2020. Based upon the facts alleged in this Consent Agreement and Final Order, and upon those factors which Complainant must consider pursuant to Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), the Complainant and Respondent agree to the payment of a civil penalty pursuant to Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), and to take the actions required by the Final Order, for the violations of

RCRA alleged in this Consent Agreement and Final Order.

General Factual Background

23. Respondent is a corporation authorized to conduct business within the State of Iowa. Respondent is a “person” as defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

24. Respondent owns and operates a facility located at 1001 3rd Street NW, Oelwein, Iowa. Respondent is a manufacturer of a blood anticoagulant.

25. On or about August 29, 2019, Respondent notified EPA, pursuant to Section 3010 of RCRA, 42 U.S.C. § 6930, as a Large Quantity Generator (“LQG”) of hazardous waste.

26. On or about February 17, 2020, EPA inspectors conducted a RCRA Compliance Evaluation Inspection (hereinafter “the inspection”) of the hazardous waste management practices at Respondent’s facility. Based on a review of the inspection report and the information provided during, and after, the inspection by facility personnel, it was determined that Respondent was operating, at the time of the inspection, as a LQG of hazardous waste, a Small Quantity Handler of universal waste, and a used oil generator.

27. At the time of the inspection, the following waste, among others, was present and being stored: a tanker truck containing approximately 4,305 gallons of waste ethanol, which is a D001 characteristic hazardous waste. The waste ethanol is a solid and hazardous waste as defined at 40 C.F.R. § 261.2 and 261.3.

28. Based upon a review of the tanker truck log, Respondent generates approximately 11,129 kilograms of waste ethanol per month at the facility.

29. Respondent has been assigned the following EPA RCRA ID Number: IAR000503912.

Violations

30. Complainant hereby states and alleges that Respondent has violated RCRA and the federal regulations promulgated thereunder, as follows:

Count 1

Operating as a Treatment, Storage or Disposal Facility Without a RCRA Permit or RCRA Interim Status

31. Complainant hereby incorporates the allegations contained in Paragraphs 23 through 29 above, as if fully set forth herein.

32. Section 3005 of RCRA, 42 U.S.C. § 6925, and the regulations at 40 C.F.R. Part 270 require each person owning or operating a facility for the treatment, storage, or disposal

of hazardous wastes identified or listed under Subchapter C of RCRA to have a permit or interim status for such activities.

33. At and before the time of the inspection, Respondent did not have a permit or interim status.

Generator Requirements

34. The regulation at 40 C.F.R. § 262.17(a) states that a large quantity generator may accumulate hazardous waste on-site for no more than ninety (90) days without a permit or interim status, and without complying with the requirements of Parts 124, 264 through 267, and 279, or the notification requirements of Section 3010 of RCRA, provided all the conditions for exemption set forth at 40 C.F.R. § 262.17 are met. If a generator fails to comply with any of these conditions, the generator is not allowed to accumulate hazardous waste at its facility for any length of time. Respondent failed to comply with the following conditions:

Failure to have and maintain a RCRA contingency plan and quick reference guide

35. To be conditionally exempt from the hazardous waste storage permitting and operating requirements, the regulation at 40 C.F.R. § 262.17(a)(6) requires that a generator comply with the applicable requirements of Subpart M of 40 C.F.R. Part 262.

36. Pursuant to 40 C.F.R. § 262.260(a), as found in 40 C.F.R. Part 262, Subpart M, a LQG must have a contingency plan for the facility designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste, or hazardous waste constituents to air, soil, or surface water.

37. Pursuant to 40 C.F.R. § 262.262(b), as found in 40 C.F.R. Part 262, Subpart M, a LQG must submit a quick reference guide of the contingency plan to local emergency responders.

38. The inspection revealed that Respondent failed to have a contingency plan and quick reference guide.

Failure to conduct and document personnel training

39. To be conditionally exempt from the hazardous waste storage permitting and operating requirements, a generator must comply with all of the requirements of 40 C.F.R. § 262.17(a).

40. Pursuant to 40 C.F.R. § 262.17(a)(7)(i)(C), a facility must have a training program designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedure, emergency equipment, and emergency systems. Further, pursuant to 40 C.F.R. § 262.17(a)(7)(iv), a facility must keep records that document that the training required under 40 C.F.R. §§ 262.17(a)(7)(i)-(iii) was given to, and completed by, facility personnel.

41. The inspection revealed that Respondent failed to conduct and document such training.

Failure to mark equipment

42. To be conditionally exempt from the hazardous waste storage permitting and operating requirements, the regulation at 40 C.F.R. § 262.17(a)(1)(i) requires that a generator comply with the applicable requirements of Subpart BB of 40 C.F.R. Part 265.

43. Pursuant to 40 C.F.R. § 265.1050(c), as found in 40 C.F.R. Part 265, Subpart BB, an owner or operator of a facility that uses equipment that contains or contacts hazardous waste with organic concentrations of at least 10 percent by weight must mark each piece of equipment to which Subpart BB applies in such a manner that it can be distinguished readily from other pieces of equipment.

44. At and before the time of the inspection, Respondent used equipment such as hoses, pumps, and connectors that contained or contacted hazardous waste with organic concentrations of at least 10 percent by weight, to convey the waste to the tanker truck. Respondent failed to mark such equipment in such a manner that it can be easily distinguished readily from other pieces of equipment.

Failure to record information in the facility operating record relating to 40 C.F.R. Part 265, Subpart BB equipment

45. To be conditionally exempt from the hazardous waste storage permitting and operating requirements, the regulation at 40 C.F.R. § 262.17(a)(1)(i) requires that a generator comply with the applicable requirements of Subpart BB of 40 C.F.R. Part 265.

46. Pursuant to 40 C.F.R. § 265.1064(b)(1), as found in 40 C.F.R. Part 265, Subpart BB, an owner or operator of a facility must record the information required under 40 C.F.R. §§ 265.1065(b)(1)(i)-(vi) in the facility operating record for each piece of equipment to which Subpart BB of Part 265 applies.

47. At and before the time of the inspection, Respondent failed to keep such records for the equipment subject to Subpart BB of Part 265, including hoses, pumps, and connectors that contained or contacted hazardous waste with organic concentrations of at least 10 percent by weight.

Failure to keep records to determine exemptions under 40 C.F.R. Part 265, Subpart BB

48. To be conditionally exempt from the hazardous waste storage permitting and operating requirements, the regulation at 40 C.F.R. § 262.17(a)(1)(i) requires that a generator comply with the applicable requirements of Subpart BB of 40 C.F.R. Part 265.

49. Pursuant to 40 C.F.R. § 265.1064(k)(3), as found in 40 C.F.R. Part 265, Subpart BB, an owner or operator of a facility that uses equipment that contains or contacts hazardous waste with organic concentrations of at least 10 percent by weight must record in its operating log an up-to-date analysis and the supporting information and data used to determine whether the equipment is subject to the requirements of 40 C.F.R. §§ 265.1052 through 265.1060, or whether it is exempt from such requirements pursuant to 40 C.F.R. § 265.1052(b)(3)(e).

50. At and before the time of the inspection, Respondent failed to keep records documenting whether equipment, including hoses, pumps, and connectors that contained or contacted hazardous waste with organic concentrations of at least 10 percent by weight, is subject to the requirements of 40 C.F.R. §§ 265.1052 through 265.1060, or whether it is exempt from such requirements pursuant to 40 C.F.R. § 265.1052(b)(3)(e).

51. Because Respondent failed to comply with the conditions for exemption from hazardous waste storage permitting and operating requirements as set forth in Paragraphs 34 through 50 above, Respondent was not authorized to store hazardous waste at the facility, and therefore was operating a hazardous waste storage facility without a permit in violation of Section 3005 of RCRA, 42 U.S.C. § 6925.

CONSENT AGREEMENT

52. For the purpose of this proceeding, as required by 40 C.F.R. § 22.18(b)(2), Respondent:

- (a) admits the jurisdictional allegations set forth herein;
- (b) neither admits nor denies the specific factual allegations stated herein;
- (c) consents to the assessment of a civil penalty, as stated herein;
- (d) consents to the issuance of any specified compliance or corrective action order;
- (e) consents to any conditions specified herein;

- (f) consents to any stated Permit Action;
- (g) waives any right to contest the allegations set forth herein; and
- (h) waives its rights to appeal the Final Order accompanying this Consent Agreement.

53. Respondent consents to the issuance of this Consent Agreement and Final Order and consents for the purposes of settlement to the payment of the civil penalty specified herein.

54. Respondent and EPA agree to the terms of this Consent Agreement and Final Order and Respondent agrees to comply with the terms specified herein.

55. Respondent and EPA agree to conciliate this matter without the necessity of a formal hearing and to bear their respective costs and attorneys' fees.

56. Respondent consents to receiving an electronic copy of the filed Consent Agreement and Final Order at the following email addresses: *thadden@dcwcasing.com* and *mschwartz@dcwcasing.com*.

Penalty Payment

57. Respondent agrees that, in settlement of the claims alleged herein, Respondent shall pay a civil penalty of Eighty Thousand Five Hundred Sixty-Two Dollars and Zero Cents (\$80,562.00).

58. Respondent shall pay the penalty within thirty (30) days of the effective date of the Final Order. Such payment shall identify Respondent by name and docket number and shall be by certified or cashier's check made payable to the "United States Treasury" and sent to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
PO Box 979077
St. Louis, Missouri 63197-9000

or by alternate payment method described at <http://www.epa.gov/financial/makepayment>.

59. A copy of the check or other information confirming payment shall simultaneously be emailed to the following:

Regional Hearing Clerk
R7_Hearing_Clerk_Filings@epa.gov; and

Britt Bieri, Attorney
bieri.britt@epa.gov.

60. Respondent understands that its failure to timely pay any portion of the civil penalty may result in the commencement of a civil action in Federal District Court to recover the full remaining balance, along with penalties and accumulated interest. In such case, interest shall begin to accrue on a civil or stipulated penalty from the date of delinquency until such civil or stipulated penalty and any accrued interest are paid in full. 31 C.F.R. § 901.9. Interest will be assessed at a rate of the United States Treasury Tax and loan rates in accordance with 31 U.S.C. § 3717. Additionally, a charge will be assessed to cover the costs of debt collection including processing and handling costs, and a non-payment penalty charge of six (6) percent per year compounded annually will be assessed on any portion of the debt which remains delinquent more than ninety (90) days after payment is due. 31 U.S.C. § 3717(e)(2).

Compliance Actions

61. Respondent shall take the following actions within the time periods specified, according to the terms and conditions specified below.

62. Within one hundred twenty days (120) of the Effective Date of this Consent Agreement and Final Order, Respondent shall submit documentation to EPA, in accordance with Paragraph 64 below, to demonstrate Respondent's compliance with 40 C.F.R. § 265.1064(b)(1). Respondent shall submit the portion of its facility operating record which must contain the following for each piece of equipment to which Subpart BB of Part 265 applies:

- i. Equipment identification number and hazardous waste management unit identification;
- ii. Approximate locations within the facility (e.g., identify the hazardous waste management unit on a facility plot plan);
- iii. Type of equipment (e.g., a pump or pipeline valve);
- iv. Percent-by-weight total organics in the hazardous waste stream at the equipment;
- v. Hazardous waste state at the equipment (e.g., gas/vapor or liquid); and
- vi. Method of compliance with the standard (e.g., "monthly leak detection and repair" or "equipped with dual mechanical seals"). If the equipment contains or contacts hazardous waste with an organic concentration of at least 10 percent by weight for less than 300 hours per calendar year, Respondent may state that such equipment is excluded from the requirements of §§ 265.1052 through 265.1060 of subpart BB of Part 265, provided such equipment is identified, as required by 40 C.F.R. § 265.1064(g)(6).

63. Within one hundred twenty days (120) days of the Effective Date of this Consent Agreement and Final Order, Respondent shall submit documentation to EPA, in accordance with Paragraph 64 below, pursuant to 40 C.F.R. § 265.1064(k)(3), for use in determining exemptions as provided in the applicability section of subpart BB of Part 265. Respondent shall submit the log that is kept in the facility operating record which must contain the following:

The number of hours each piece of equipment has contained or contacted

hazardous waste with an organic concentration of at least 10 percent by weight during the first ninety (90) days following the Effective Date of this Consent Agreement and Final Order.

64. Respondent shall submit all documentation generated to comply with the requirements as set forth in the immediately preceding paragraphs to the following email address:

Kevin Snowden, ECAD/CB/RCRA
snowden.kevin@epa.gov.

Effect of Settlement and Reservation of Rights

65. Full payment of the penalty proposed in this Consent Agreement shall only resolve Respondent's liability for federal civil penalties for the violations alleged herein. Complainant reserves the right to take any enforcement action with respect to any other violations of RCRA or any other applicable law.

66. The effect of settlement described in the immediately preceding paragraph is conditioned upon the accuracy of Respondent's representations to the EPA, as memorialized in paragraph directly below.

67. Respondent certifies by the signing of this Consent Agreement and Final Order that to the best of its knowledge, it is presently in compliance with all requirements of RCRA, 42 U.S.C. § 6901 *et. seq.*, its implementing regulations, and any permit issued pursuant to RCRA.

68. Full payment of the penalty proposed in this Consent Agreement shall not in any case affect the right of the Agency or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law. This Consent Agreement and Final Order does not waive, extinguish or otherwise affect Respondent's obligation to comply with all applicable provisions of RCRA and regulations promulgated thereunder.

69. Notwithstanding any other provision of this Consent Agreement and Final Order, EPA reserves the right to enforce the terms and conditions of this Consent Agreement and Final Order by initiating a judicial or administrative action under Section 3008 of RCRA, 42 U.S.C. § 6928, and to seek penalties against Respondent in an amount not to exceed Sixty One Thousand Eight Hundred Twenty Dollars (\$61,820) per day, per violation, pursuant to Section 3008(c) of RCRA, for each day of non-compliance with the terms of this Consent Agreement and Final Order, or to seek any other remedy allowed by law.

70. Except as expressly provided herein, nothing in this Consent Agreement and Final Order shall constitute or be construed as a release from any claim (civil or criminal), cause of action, or demand in law or equity by or against any person, firm, partnership, entity, or corporation for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous constituents,

hazardous substances, hazardous wastes, pollutants, or contaminants found at, taken to, or taken from Respondent's facility.

71. Notwithstanding any other provisions of the Consent Agreement and Final Order, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 U.S.C. § 6973, or other statutory authority, should EPA find that the handling, storage, treatment, transportation, or disposal of solid waste or hazardous waste at Respondent's facility may present an imminent and substantial endangerment to human health and the environment.

72. Nothing contained in the Final Order portion of this Consent Agreement and Final Order shall alter or otherwise affect Respondent's obligation to comply with all applicable federal, state, and local environmental statutes and regulations and applicable permits.

General Provisions

73. By signing this Consent Agreement, the undersigned representative of Respondent certifies that he or she is fully authorized to execute and enter into the terms and conditions of this Consent Agreement and has the legal capacity to bind the party he or she represents to this Consent Agreement.

74. This Consent Agreement shall not dispose of the proceeding without a final order from the Regional Judicial Officer or Regional Administrator ratifying the terms of this Consent Agreement. This Consent Agreement and Final Order shall be effective upon the filing of the Final Order by the Regional Hearing Clerk for EPA, Region 7. Unless otherwise stated, all time periods stated herein shall be calculated in calendar days from such date.

75. The penalty specified herein shall represent civil penalties assessed by EPA and shall not be deductible for purposes of Federal, State and local taxes.

76. This Consent Agreement and Final Order shall apply to and be binding upon Respondent and Respondent's agents, successors and/or assigns. Respondent shall ensure that all contractors, employees, consultants, firms, or other persons or entities acting for Respondent with respect to matters included herein comply with the terms of this Consent Agreement and Final Order.

77. The headings in this Consent Agreement and Final Order are for convenience of reference only and shall not affect interpretation of this Consent Agreement and Final Order.

78. The provisions of this Consent Agreement and Final Order shall be deemed satisfied upon a written determination by Complainant that Respondent has fully implemented the actions required in the Final Order.

RESPONDENT:

DCW CASING LLC

5/13/2021
Date


Signature

Phil Schwartz
Printed Name

President & CEO
Title

COMPLAINANT:

U.S. ENVIRONMENTAL PROTECTION AGENCY

Date

Candace Bednar
Chemical Branch Chief
Enforcement and Compliance Assurance Division

Date

Britt Bieri
Office of Regional Counsel

FINAL ORDER

Pursuant to Sections 3008(a) and (g) of RCRA, 42 U.S.C. §§ 6928(a) and (g), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits, 40 C.F.R. Part 22, the foregoing Consent Agreement resolving this matter is hereby ratified and incorporated by reference into this Final Order.

Respondent is ORDERED to comply with all of the terms of the Consent Agreement. In accordance with 40 C.F.R. § 22.31(b), the effective date of the foregoing Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk.

IT IS SO ORDERED.

Karina Borroneo
Regional Judicial Officer

Date

CERTIFICATE OF SERVICE

I certify that that a true and correct copy of the foregoing Consent Agreement and Final Order was sent this day in the following manner to the addressees:

Copy via Email to Complainant:

bieri.britt@epa.gov

Copy via Email to Respondent:

thadden@dcwcasing.com

and

mschwartz@dcwcasing.com.

Copy via Email to the State of Iowa:

Ed Tormey, Acting Administrator
Environmental Services Division
Iowa Department of Natural Resources
ed.tormey@dnr.iowa.gov

Mike Sullivan, Chief
Contaminated Sites Section
Iowa Department of Natural Resources
michael.sullivan@dnr.iowa.gov

Dated this _____ day of _____, _____.

Signed