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

BEFORE THE ADMINISTRATOR

IN THE MATTER OF)
) Docket No. CWA-07-2017-0134
)
Schildberg Construction Company, Inc.)
)
)
) FINDINGS OF VIOLATION AND
) ADMINISTRATIVE ORDER FOR
) COMPLIANCE ON CONSENT
Desmandant)
Respondent,)
)
Proceeding under Sections 309(a)(3) of the)
Clean Water Act, $33 \text{ U.S.C. } \{1319(a)(3)\}$)
)

I. Preliminary Statement

1. The FINDINGS OF VIOLATION are made and ORDER ON CONSENT (Order) is issued by the U.S. Environmental Protection Agency (EPA) to the Schildberg Construction Company, Inc. (Respondent), pursuant to the authority vested in the Administrator of EPA by Section 309(a) of the Clean Water Act (CWA), 33 U.S.C. § 1319(a), as amended. This authority has been delegated by the Administrator of EPA to the Regional Administrator of EPA, Region 7, and further delegated to the Director of Region 7's Water, Wetlands, and Pesticides Division.

2. EPA, together with the Respondent, enter into this Section 309(a)(3) Order for Compliance on Consent in order to carry out the goals of the CWA, 33 U.S.C. § 1251 *et seq.*, to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters."

3. It is the parties' intent through this agreement to address violations of the NPDES permits issued to Respondent pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

4. By entering into this Order, Respondent (1) consents to and agrees not to contest EPA's authority or jurisdiction to issue or enforce this Order; (2) agrees to undertake all actions required by the terms and conditions of this Order; and (3) consents to be bound by the requirements set forth herein. Respondent also waives any and all remedies, claims for relief and

otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this Order on Consent, including, but not limited to, any right of judicial review under Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706; provided, however, that Respondent neither admits nor denies the factual allegations contained in this Order on Consent.

II. Statutory and Regulatory Framework

5. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants except in compliance with, *inter alia*, Section 402 of the CWA, 33 U.S.C. § 1342. Section 402 of the CWA provides that pollutants may be discharged only in accordance with the terms of a National Pollutant Discharge Elimination System (NPDES) permit issued pursuant to that Section.

6. The CWA prohibits the "discharge" of "pollutants" from a "point source" into a "navigable water" of the United States, as these terms are defined by Section 502 of the CWA, 33 U.S.C. § 1362.

7. Section 402(p) of the CWA requires, in part, that a discharge of stormwater associated with an industrial activity must conform with the requirements of a NPDES permit issued pursuant to Sections 301 and 402 of the CWA.

8. To implement Section 402 of the CWA, EPA promulgated regulations codified at 40 C.F.R. Part 122. Under 40 C.F.R. Part 122.1, a NPDES permit is required for the discharge of pollutants from any point source into waters of the United States.

9. Section 309(a)(3) of the CWA, 33 U.S.C. § 1319(a)(3), authorizes the EPA to issue administrative orders to require persons to take those actions necessary to comply with the requirements of the CWA including the terms and conditions of a permit issued pursuant to Section 402 of the CWA. Section 402(p) of the CWA, 33 U.S.C. § 1342(p), sets forth requirements for the issuance of NPDES permits for the discharge of stormwater.

10. Pursuant to Section 402(p) of the CWA, the EPA promulgated regulations setting forth the NPDES permit requirements for stormwater discharges at 40 C.F.R. § 122.26.

11. 40 C.F.R. §§ 122.26(a)(1)(ii) and 122.26(c) require dischargers of stormwater associated with industrial activity to apply for an individual permit or to seek coverage under a promulgated stormwater general permit.

12. 40 C.F.R. § 122.26(b)(14)(iii) defines "stormwater discharge associated with industrial activity," in part, as discharges from facilities involved in active or inactive mining operations, including Standard Industrial Classification (SIC) 1422 (Limestone Mining).

13. Section 309(g) of the CWA provides for the assessment of civil penalties for violations of conditions or limitations in a permit issued pursuant to Section 402 of the CWA.

14. The Iowa Department of Natural Resources (IDNR) is the state agency with the authority to administer the federal NPDES program in Iowa pursuant to Section 402 of the CWA, 33 U.S.C. § 1342. The Missouri Department of Natural Resources (MDNR) is the state agency with the authority to administer the federal NPDES program in Missouri pursuant to Section 402 of the CWA, 33 U.S.C. 1342. EPA maintains concurrent enforcement authority with authorized state NPDES programs for violations of NPDES permits.

III. EPA Findings

Findings of Fact and Law

15. Respondent is a person as that term is defined by Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

16. Respondent is and was at all times relevant to this action the owner and/or operator of a facility operating under the name Schildberg Construction Company, Inc., located at 1605 218th Avenue, Osceola, Iowa 50213, operating under SIC code 1422 (the "Osceola Facility") as well as a facility located at 34466 Elkhorn Trail, Graham Missouri 64455, also operating under SIC code 1422 (the "Graham Facility" and collectively with the Osceola Facility, the "Facilities").

17. Stormwater, snow melt, surface drainage and runoff water leave Respondent's Osceola Facility and discharge into unnamed tributaries of South Squaw Creek. Stormwater, snow melt, surface drainage and runoff water leave Respondent's Graham Facility and discharge into the East Branch of Elkhorn Creek. The runoff and drainage from Respondent's Facilities is "stormwater" as defined by 40 C.F.R. § 122.26(b)(13).

18. Stormwater from the Facilities contains "pollutants" as defined by Section 502(6) of the CWA, 33 U.S.C. § 1362(6).

19. Each of Respondent's Facilities has "stormwater discharges associated with industrial activity" as defined by 40 C.F.R. § 122.26(b)(14)(x), and is a "point source" as defined by Section 502(14) of the CWA, 33 U.S.C. § 1362(14).

20. The East Branch of the Elkhorn Creek and the unnamed tributaries to South Squaw Creek are "waters of the United States" as defined by Section 502(7) of the CWA, 33 U.S.C. § 1362(7), and its implementing regulation, 40 C.F.R. § 122.2.

21. Stormwater runoff from Respondent's industrial activity results in the addition of pollutants from a point source to waters of the United States, and thus is the "discharge of a pollutant" as defined by CWA Section 502(12), 33 U.S.C. § 1362(12).

22. Respondent's discharge of pollutants associated with an industrial activity, as defined by 40 C.F.R. § 122.26(b)(14)(iii), requires a permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

23. IDNR implemented General Permit #3 for the discharge of stormwater under the NPDES, on October 1, 2007. The permit governs stormwater discharges associated with industrial activity from asphalt plants, concrete batch plants, rock crushing plants and construction sand and gravel facilities. Respondent applied for and was issued NPDES permit coverage under the general permit described above, which will expire on October 1, 2017, for the Osceola Facility.

24. IDNR also implemented General Permit #5 for discharge of wastewater from mining and processing facilities. Respondent applied for and was issued NPDES permit coverage under this general permit, which will expire on July 19, 2021, for the Osceola Facility.

25. MDNR issued NPDES Permit No. MOG490202 for Respondent's Graham Facility on November 01, 2011.

26. Respondent's NPDES permits authorize Respondent to discharge pollutants only from specified point sources, identified in the NPDES permits as one or more "outfalls," to specified waters of the United States, subject to the limitations and conditions set forth in the NPDES permits.

27. Respondent has operated under the Permits at all times relevant to this Complaint.

28. On July 22, 2009, EPA performed an Industrial Stormwater Compliance Evaluation Inspection of Respondent's Osceola Facility under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to evaluate Respondent's compliance with its NPDES permit and the CWA. During this inspection, EPA's Inspector identified several violations of Schildberg's NPDES permit. EPA subsequently issued a Letter of Warning to Schildberg, notifying Schildberg of its noncompliance.

29. On May 5 and 6, 2015, EPA performed an Industrial Stormwater Compliance Evaluation Inspection (hereafter "the 2015 Inspection") of Respondent's Osceola Facility under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to evaluate Respondent's compliance with its NPDES permit and the CWA.

30. On March 8 and 10, 2016, EPA performed an Industrial Stormwater Compliance Evaluation Inspection (hereafter "the 2016 Inspection") of Respondent's Graham Facility under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to evaluate Respondent's compliance with its NPDES permit and the CWA.

31. During the Inspections, the EPA inspector reviewed Respondent's records related to the NPDES permits, observed the Facilities and the receiving streams to which stormwater is discharged. As described below, EPA's inspector identified NPDES permit violations at both Facilities.

32. Based on Respondent's pattern of noncompliance at the Osceola Facility and the Graham Facility, EPA has reason to believe that Respondent may have violations of stormwater requirements at its additional facilities.

Findings of Violation

33. The facts stated above, are herein incorporated.

Count One (Failure to Properly Operate and Maintain)

34. Both of Respondent's Permits (General Permit #3 and #5) issued by IDNR require that Respondent properly operate and maintain all facilities and systems of treatment and control.

35. During the EPA inspection of the Osceola Facility, EPA's Inspector observed multiple instances of pollution control structures that were not properly operated and maintained as described below:

- Lime had spilled over and through the gravel berm that was constructed to prevent lime from entering the nearby creek due to the height of the accumulated lime pile and the multiple breaches in the gravel berm;
- Breaches in the berm surrounding the stormwater sedimentation basin allowed stormwater to bypass the settling basin and discharge directly into the creek;
- Poor maintenance of the berm on the settling basins for the active quarry; and
- Poor maintenance of the rock check dams allowed stormwater to flow around and/or through the dams into the nearby tributary.

36. Respondent's General Permit issued by MDNR requires the permittee to provide sediment and erosion control sufficient to prevent pollution to waters of the state.

37. During the EPA inspection of the Graham Facility, EPA's Inspector observed multiple instances of deficient pollution control measures as described below:

- Rock check dams 7 and 8 were ineffective in preventing soil erosion along the discharge pathway, resulting in soil in the receiving stream;
- Rock check dams 1-8 were poorly constructed and/or maintained; and
- Split in the discharge hose, resulting in erosion along outfall 002 drainage pathway.

38. The EPA finds that each of Respondent's violations described above, is a violation of the terms and conditions of Respondent's NPDES permit, implementing Sections 301(a) and 308 of the CWA, 33 U.S.C. §§ 1311(a) and 1318, and as such, is a violation of a permit condition established pursuant to Section 402 of the Act and EPA's implementing regulations

Count Two (Inadequate Inspections)

39. Respondent's General Permit #3 issued by IDNR requires the facility to perform visual inspections of stormwater management measures and pollution prevention measures to ensure that the measures are operating correctly.

40. The 2015 Inspection referenced above revealed that Respondent failed to adequately identify the poor maintenance of the BMPs described above, despite completing daily inspections of pollution controls.

41. Respondent's failure to properly conduct inspections is a violation of the terms and conditions of Respondent's NPDES permit, implementing Sections 301(a) and 308 of the CWA, 33 U.S.C. §§ 1311(a) and 1318, and as such, is a violation of a permit condition established pursuant to Section 402 of the Act and EPA's implementing regulations.

<u>Count Three</u> (Failure to Conduct Inspections)

42. Respondent's General Permit issued by MDNR requires the permittee to develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that, among other things, includes a schedule for monthly inspections for the purpose of observing and evaluating of BMP effectiveness, deficiencies, and corrective measures that will be taken. The permit requires that the facility keep documentation of such inspections. The SWPPP requires monthly inspections, annual Comprehensive Site Compliance Evaluations, and daily visual inspections of the area exposed to stormwater.

- 43. EPA's inspection of the Graham Facility revealed that the Respondent failed to:
 - Conduct monthly inspections from December 2011 through April 2012;
 - Conduct monthly inspections from June 2012 through February 2016;
 - Conduct daily visual inspections of the areas exposed to stormwater; and
 - Conduct Annual Comprehensive Site Compliance Evaluations in 2012, 2013, and 2014.

44. Respondent's failure to conduct inspections is a violation of the terms and conditions of Respondent's NPDES permit implementing Sections 301(a) and 308 of the CWA, 33 U.S.C. §§ 1311(a) and 1318, and as such, is a violation of a permit condition established pursuant to Section 402 of the Act and EPA's implementing regulations.

IV. Compliance Order on Consent

45. Based on the Findings of Fact and Law and Findings of Violation set forth above, and pursuant to Section 309(a)(3) of the CWA, 33 U.S.C. § 1319(a)(3), EPA hereby ORDERS, and the Respondent hereby AGREES to take, the actions described below:

46. Respondent shall immediately take whatever actions are necessary to correct the deficiencies and eliminate and prevent recurrence of the violations cited above, and to come into compliance with all the applicable requirements of its Permits.

47. Third-Party Audit and Implementation of Third-party's Recommendations

a. Respondent agrees to retain, at its expense, a third-party contractor to conduct a comprehensive audit of Respondent's compliance with the requirements set forth in its NPDES permits. Respondent shall require that the Third-party act independently and objectively when performing all activities related to assessing the Respondent's compliance with this settlement. Respondent shall provide the Third-party with full access to its facilities, and provide or otherwise make available any necessary personnel and documents to fully perform all necessary audit activities.

b. Respondent shall identify a Third-party to conduct the audit as set forth below and certifies by signature of this Order that such Third-party will conduct the audit independent of any influence by Respondent.

c. EPA will notify the Respondent in writing whether it approves of the proposed Thirdparty. Within ten (10) days of EPA approval, Respondent shall retain such Third-party to perform the audit activities set forth in this Order. Defendant shall ensure that all audit personnel who conduct or otherwise participate in audit activities shall certify that they satisfy the conditions set forth in this document before receiving any payment from Respondent.

If EPA rejects a proposed Third-party, within thirty (30) days of receipt of EPA's notification Respondent shall submit to EPA for approval another proposed Third-party that meets the qualifications set forth above. EPA will review the proposed replacement in accordance with this Paragraph.

d. The Third-party shall perform the following activities and document Respondent's compliance with Respondent's NPDES permits at each of Respondent's facilities listed in Appendix A (collectively, the "Audit Facilities").

- i. Assessment of each facility's SWPPP to ensure the plan is specific to, and appropriate for, each individual facility;
- ii. Assessment of each facility's installed stormwater best management practices;
- iii. Assessment of each facility's self-inspection reports;
- iv. Assessment of each facility's SWPPP map complete with flow direction, stormwater BMPs, adjacent stormwater MS4 inlets or conveyances, stormwater outfalls, location of the nearest water course, etc.;
- v. Assessment of each facility's training program;
- vi. Assessment of each facility's good housekeeping program;
- vii. Assessment of each facility's sampling program, sampling location, sample collection procedures, etc.;
- viii. Assessment of each facility's material storage areas; and
- ix. Assessment of any other areas within each facility's footprint that could contribute to a discharge of pollutants.

e. Within seven (7) months of EPA's approval of the Third-party, the Third-party shall concurrently submit the audit reports (Audit Report) to EPA and Respondent. In addition, the Respondent shall ensure that the Third-party concurrently shares any draft or preliminary findings or reports in any format (electronic or paper) with EPA and Respondent.

- i. The Audit Report shall include all findings and monitoring results of the Third-party.
- ii. The Third-party shall provide copies of all documents reviewed and identify all Facility personnel interviewed in support of the Audit Report.
- iii. Respondent shall require the Third-party to include in any Audit Report submitted to EPA pursuant to this Order a certification that the Third-party has remained in compliance with all of the conditions set forth in this paragraph, including that the Third-party conducted the audit independent from any influence by Respondent.

f. The Audit Report, or any information developed or findings of the Third-party, shall not be subject to any privilege or protection, excluding any protections that may be asserted by the Respondent as necessary to protect any Confidential Business Information (CBI) pursuant to the procedures specified by 40 CFR Part 2, Subpart B. In the event Respondent seeks to protect any CBI, Respondent will notify the Third-party of any CBI at the time of the onsite visit to each facility by Third-party.

g. Respondent shall remedy and/or correct all findings identified in the Audit Report as expeditiously as possible but no later than sixty (60) days from receipt of the Audit Report or as otherwise agreed to by EPA.

h.Within thirty (30) days of the submission of the Audit Report to Respondent and EPA, Respondent shall submit to EPA a response to all findings set forth in the Audit Report. In the response, Respondent shall describe each completed or proposed action to correct each finding identified in the Audit Report submitted to EPA, including the date(s) that such corrections occurred or are scheduled to occur. The Respondent's response to the Audit Report shall include a timeline of events that have occurred to complete these actions. The timeline must identify the date of starting the assessment, each date each facility was assessed, date of identified finding, date of submission of report to Respondent and EPA, date of corrective actions, date of completion of assessment, etc.

i. Nothing in the Audit Report, including any findings, the observations or assessment by the Third-party, or any subsequent response(s) by Respondent shall be used as an admission against Respondent. However, to the extent that the Audit Report identifies noncompliance with Respondent's NPDES permits, or Respondent fails to correct such noncompliance as indicated in Respondent's response to the Audit Report, EPA reserves the right to take action to require correction of the findings and nothing in this Order, including this subparagraph, shall affect EPA's authority under the CWA or other applicable law. EPA shall consider Respondent's agreement to the retention of the Third-party and preparation of the Audit Report and any good-faith efforts to correct such

potential findings in determining any potential EPA enforcement response and any potential penalty assessed. Respondent does not admit any liability and reserves all rights and defenses it has with respect to the findings and any underlying facts identified in the Audit Report.

48. The Respondent shall at all times comply with requirements established by the State of Missouri and Iowa regarding repair, construction and operation of facilities associated with the Respondent's Facilities, including, but not limited to, any requirements for work to be performed by certified or licensed professional engineers, submission and approval of plans and specifications, and construction and operation permitting. In developing plans and schedules required by this Order, the Respondent shall allocate adequate time and resources to comply with applicable State requirements.

49. The Respondent shall provide on its website a listing of permits that govern the Respondent's Facilities, with a link to such permits as well as a statement in the section relating to the Respondent's stormwater permits indicating the Respondent is required to have in place a SWPPP, plus an indication that for the relevant fiscal year (July 1 - June 30) the Company has conducted its annual comprehensive site compliance evaluation for each of the Facilities.

Certification

50. All submissions made by the Respondent or the Third-party to the EPA pursuant to the requirements of this Order shall contain the following certification signed by an authorized official, as described at 40 C.F.R. § 122.2:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing submissions of false information.

Submittals

51. All documents, including certifications, required to be submitted to EPA by this Order, shall be submitted by electronic mail to:

Delia Garcia, PhD or her successor U.S. Environmental Protection Agency – Region 7 Water, Wetlands and Pesticides Division 11201 Renner Boulevard Lenexa, Kansas 66219. Garcia.delia@epa.gov Electronic submissions will be deemed submitted on the date they are transmitted electronically. Any report, notification, certification, or other communication that cannot be submitted electronically shall be submitted in hard-copy to the address provided in this Paragraph.

V. General Provisions

Effect of Compliance with the Terms of this Order

52. Compliance with the terms of this Order shall not relieve the Respondent of liability for, or preclude the EPA from, initiating an administrative or judicial enforcement action to recover penalties for any violations of the CWA, or to seek additional injunctive relief for any such violations, pursuant to Section 309 of the CWA, 33 U.S.C. § 1319.

53. The Respondent shall comply with all other applicable laws, regulations, standards, and requirements contained in any applicable local, state and federal pretreatment laws, regulations, standards, and requirements including any such laws, regulations, standards, or requirements that may become effective during the term of this Order.

54. This Order does not constitute a waiver or a modification of any requirements of the CWA, 33 U.S.C. § 1251 et seq., all of which remain in full force and effect. The EPA retains the right to seek any and all remedies available under Sections 309(b), (c), (d) or (g) of the CWA, 33 U.S.C. § 1319(b), (c), (d) or (g), for any violation cited in this Order. Issuance of this Order shall not be deemed an election by the EPA to forgo any civil or criminal action to seek penalties, fines, or other appropriate relief under the CWA for any violation whatsoever.

Access and Requests for Information

55. Nothing in this Order shall limit the EPA's right to obtain access to, and/or to inspect the Respondent's facility, and/or to request additional information from the Respondent, pursuant to the authority of Section 308 of the CWA, 33 U.S.C. § 1318 and/or any other authority.

Severability

56. If any provision or authority of this Order, or the application of this Order to the Respondent, is held by federal judicial authority to be invalid, the application to the Respondent of the remainder of this Order shall remain in full force and effect and shall not be affected by such a holding.

Effective Date

57. This Order shall be effective upon receipt by the Respondent of a fully executed copy hereof. All time periods herein shall be calculated therefrom unless otherwise provided in this Order.

Termination

58. This Order shall remain in effect until a written notice of termination is issued by an authorized representative of the EPA.

Signatories

59. The undersigned for each party has the authority to bind each respective Party to the terms and conditions of this Order. The Order may be signed in part and counterpart by each Party.

For the Complainant, United States Environmental Protection Agency, Region 7:

Issued this <u>13</u> day of <u>JUNE</u>, 2017.

Jeffery Robichaud

Acting Director Water, Wetlands and Pesticides Division U.S. Environmental Protection Agency – Region 7

for

Elizabeth Huston Senior Counsel Office of Regional Counsel U.S. Environmental Protection Agency – Region 7

For the Respondent:

Mark A Schilderig 4/7/17 Signature Date Date

Resolent Title

CERTIFICATE OF SERVICE

I certify that on the date noted below I hand delivered the original and one true copy of this Administrative Order for Compliance on Consent to the Regional Docket Clerk, United States Environmental Protection Agency, 11201 Renner Boulevard, Lenexa, Kansas 66219.

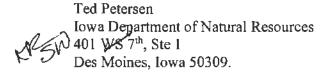
I further certify that on the date noted below I sent a copy of the foregoing Order for Compliance on Consent by certified mail, return receipt requested, to:

> Mark A. Schildberg P.O. Box 358 Greenfield, Iowa 50849

and by first class mail to:

Paul Dickerson Chief, Water Pollution Compliance and Enforcement Section Missouri Department of Natural Resources P.O. Box 176 Jefferson City, Missouri 65102-0176;

and



0/20/17

Kathylovinso

Date

APPENDIX A Schildberg Construction Facilities

Name	Address	County
Corning Quarry	1816 Brooks Road, Corning, IA 50849	Adams
Decatur Quarry	17411 State Highway 2, Decatur, IA 50067-4536	Decatur
Monarch Quarry	1773 - 115th Street, Earlham, IA 50072	Madison
Grand River Quarry	13004 135th St., Grand River, IA 50108	Decatur
Lewis Quarry	1/2 Mile North of 560th Lane and Park Road, Lewis, IA	Cass
Macedonia Quarry	11910 - 385th Street, Macedonia, IA 51549	Pottawattamie
Menio Quarry	1288 Orange Ave., Menlo, IA 50164	Adair
Osceola	1605 218th Ave., Osceola, IA 50213	Clarke
Atlantic Mine	2301 SW 7th Street, Atlantic, IA 50022	Cass
Daggett Quarry	1698 Pitzer Road, Winterset, IA 50072	Madison
Malvern Quarry	30565 Lytle Avenue, Malvern, IA 51551	Mills
Thayer Quarry	2118 Willow Road, Thayer, IA 50254	Union
Crescent Quarry	15786 Lime Kiln Rd., Crescent, IA 51526	Pottawattamie
Shambaugh Quarry	3093 Teak Ave., Shambaugh, IA 51631	Page
Stennett Quarry	1423 J Ave., Red Oak, IA 51566	Montgomery
Watterson Quarry	3150 County Highway P46, Mount Ayr, IA 50854	Ringgold
Winterset Quarry	2449 State Highway 92, Winterset, IA 50273-8185	Madison

Missouri

Name	Address	County
Forcade Quarry	34466 Elkhorn Trail, Graham, MO 64455	Nodaway