

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

In the Matter of:)
)
O’Reilly Automotive Inc.,) **Docket No. RCRA-07-2021-0047**
)
Respondent.)

CONSENT AGREEMENT AND FINAL ORDER

PRELIMINARY STATEMENT

The U.S. Environmental Protection Agency (EPA), Region 7 (“Complainant”) and O’Reilly Automotive Inc. (“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 Sections 3001 and 3005 of RCRA, 42 U.S.C §§ 6921 and 6925, and the standards for identification and listing of hazardous waste (40 C.F.R. Part 261 and 262.11) and the standards applicable to generators of hazardous waste (40 C.F.R. § 262).

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 O’Reilly Automotive Inc., a corporation authorized to operate under the laws 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. Parts 261, 262, 273, and 279.

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 “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).

12. 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.

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

14. "Hazardous waste" is defined at 40 C.F.R. § 261.3.

15. 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 or whose act first causes a hazardous waste to become subject to regulation.

16. The regulation at 40 C.F.R. § 260.10 defines "small quantity generator" ("SQG") as a generator who generates the following amounts in a calendar month:

- a. Greater than 100 kilograms but less than 1,000 kilograms of non-acute hazardous waste; and
- b. Less than or equal to 1 kilogram of acute hazardous waste listed in 40 C.F.R. § 261.31 or § 261.33(e); and
- c. Less than or equal to 100 kilograms of any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any acute hazardous waste listed in 40 C.F.R. § 261.31 or § 261.33(e).

17. 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.

18. 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 \$37,500 for violations that occurred before November 2, 2015, and 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

19. Respondent is a corporation and 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).

20. Respondent owns and operates a facility located at 1800 Guthrie Avenue in Des Moines, Iowa ("facility") and known as Ozark Automotive Distributors DC 4. Respondent uses

the facility as an automotive parts distribution center. Respondent employs approximately 150 people at the facility.

21. On or about March 27, 2002, Respondent notified EPA of its generator status as a Small Quantity Generator of hazardous waste pursuant to Section 3010 of RCRA, 42 U.S.C. § 6930.

22. As a result of their initial notification on or about March 27, 2002, the facility was assigned EPA RCRA ID Number IAR000501130.

23. On or about September 17, 2019, an Eastern Research Group inspector, on behalf of the EPA, 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 the inspection by facility personnel, it was determined that Respondent was operating, at the time of the inspection, as a Small Quantity Generator of hazardous waste, a Small Quantity Handler of universal waste lamps, and a used oil generator.

24. At the time of the inspection, the following wastes, among others, were present in the central accumulation area of Respondent's facility. These are solid and hazardous wastes as defined at 40 C.F.R. § 261.2 and 261.3:

- a. One 55-gallon container nearly full of waste aerosol, which is a D001 RCRA characteristic hazardous waste;
- b. One 55-gallon container with approximately 45 gallons of waste paint activator, catalyst, and accelerator, which are D001, D035, F003, and F005 RCRA characteristic and listed hazardous wastes;
- c. One 55-gallon container with approximately 30 gallons of waste paint and paint solvents, which are D001, D035, F003, and F005 RCRA characteristic and listed hazardous wastes;
- d. One 55-gallon container with approximately 11 gallons of waste chem dip, which is a D001 RCRA characteristic hazardous waste;
- e. One 55-gallon container with approximately 20 gallons of waste acetone and paint stripper, which are D001 and U080 RCRA characteristic and listed hazardous wastes;
- f. One 55-gallon container with an unknown quantity of waste flammable liquid which is a D001, D035, F002, F003, and F005 RCRA characteristic and listed hazardous waste; and
- g. One 100-gallon cardboard bin with approximately 50 gallons of miscellaneous damaged waste products from the list above, which are D001, D035, F002, F003, F005, and U080 RCRA characteristic and listed hazardous wastes.

25. At the time of the inspection, one 100-gallon tank half-full of used oil was present in the central accumulation area.

26. At the time of the inspection, one wrapped pallet of universal waste bulbs was present near the maintenance shop.

Violations

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

Count 1

Failure to Maintain Documentation of Hazardous Waste Determinations

28. Complainant hereby incorporates the allegations contained in Paragraphs 19 through 26 above, as if fully set forth herein.

29. Pursuant to 40 C.F.R. § 262.11, a generator of solid waste, as defined in 40 C.F.R. §§ 260.10 and 261.2, must determine if that waste is a hazardous waste using methods prescribed in the regulations and must maintain records supporting its hazardous waste determinations, including records that identify whether a solid waste is a hazardous waste. Records must be maintained for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal.

30. At the time of the inspection, it was determined that the waste streams identified in Paragraph 24 were present and/or regularly generated at Respondent's facility.

31. At the time of the inspection, Respondent could not produce documentation of hazardous waste determinations on any of the solid waste streams described in Paragraph 24 above.

32. Respondent's failure to maintain documentation of hazardous waste determinations on the above-referenced solid waste streams is a violation of Section 3001 of RCRA, 42 U.S.C. § 6921, and 40 C.F.R. § 262.11.

Count 2

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

33. Complainant hereby incorporates the allegations contained in Paragraphs 19 through 26 above, as if fully set forth herein.

34. 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.

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

Generator Requirements

36. The regulation at 40 C.F.R. § 262.16 states that a small quantity generator may accumulate hazardous waste on-site without a permit or interim status, and without complying with the requirements of 40 C.F.R. Parts 124, 264 through 267, and 270, or the notification requirements of 3010 of RCRA, provided that all the conditions for exemption listed in 40 C.F.R. § 262.16 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:

Accumulation

37. A SQG may accumulate hazardous waste on site for no more than 180 days unless in compliance with the accumulation time limit extension or accumulation conditions for exemption in 40 C.F.R. § 262.16(b) through (f).

38. At the time of the inspection, Respondent transported its waste from the facility 200 miles or more for off-site storage, treatment, or disposal. Therefore, pursuant to 40 C.F.R. § 262.16(c), Respondent could accumulate hazardous waste on site for 270 days without a permit or without having interim status if all requirements of § 262.16(b) were met. No other accumulation extensions or exemptions were in effect.

39. At the time of the inspection, the inspector observed one 55-gallon drum of waste paint related material with about 45 gallons inside, dated January 3, 2019; one 55-gallon drum of waste flammable liquids with approximately 30 gallons inside, dated January 3, 2019; and one 55-gallon drum of chem dip with about 11 gallons inside, dated January 3, 2019. Hazardous waste manifests show that all three containers were transported off-site from the facility on October 23, 2019. Therefore, each of the three containers accumulated waste on-site for 293 days, exceeding the 270-day threshold for waste accumulation without a permit or interim status by 23 days for each container.

40. By storing hazardous waste on-site for greater than 270 days, Respondent was operating as a hazardous waste storage facility and subjected itself to the requirements of 40 C.F.R. Parts 264, 265, and the permit requirements of 40 C.F.R. Part 270.

Condition of hazardous waste accumulation containers

41. In order to be conditionally exempt from hazardous waste storage permitting and operating requirements, the regulation at 40 C.F.R. § 262.16(b)(2)(i) states that if a container holding hazardous waste is not in good condition, or if it begins to leak, the SQG must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the conditions for exemption.

42. At the time of the inspection, the inspector observed a hazardous waste storage container that was not in good condition. The hazardous waste container was a 100-gallon cardboard bin in the central accumulation area that held damaged products. The inspector observed that this container held full or partially full waste aerosol cans containing RCRA ignitable hazardous waste (RCRA characteristic hazardous waste code – D001), leaking containers of motor oil (used oil), greases, leaking containers of antifreeze, and other types of products damaged during normal operations. Further, the inspector observed that the container was poorly maintained and broken along the bottom where it was observed that it had been leaking fluid.

Management of containers

43. In order to be conditionally exempt from hazardous waste storage permitting and operating requirements, the regulation at 40 C.F.R. § 262.16(b)(2)(iii)(A) states that a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.

44. At the time of the inspection, the inspector observed the 100-gallon cardboard bin in the central accumulation area that held damaged products, including D001 RCRA characteristic hazardous waste, was not closed.

Labeling and marking of containers

45. In order to be conditionally exempt from hazardous waste storage permitting and operating requirements, the regulation at 40 C.F.R. § 262.16(b)(6)(i)(A-C) states that the SQG must mark or label its containers with the following:

- a. The words “Hazardous Waste”;
- b. An indication of the hazards of the contents; hazard communication consistent with Department of Transportation requirements; a hazard statement or pictogram consistent with Occupational Safety and Health Administration Hazard Communication Standard; or a chemical hazard label consistent with the National Fire Protection Association; and
- c. The date upon which each period of accumulation begins clearly visible for inspection on each container.

46. At the time of the inspection, the following containers were not appropriately labeled or marked:

- a. One 55-gallon drum in the central accumulation area containing waste acetone and waste paint stripper, which are D001 characteristic and U080 listed hazardous wastes, was not labeled “Hazardous Waste;” and
- b. The 100-gallon cardboard bin in the central accumulation area holding miscellaneous damaged waste products from the list above, which are D001, D035, F002, F003, F005, and U080 RCRA characteristic and listed hazardous waste, was not labeled “Hazardous Waste.”

Emergency Procedures: Required aisle space

47. In order to be conditionally exempt from hazardous waste storage permitting and operating requirements, the regulation at 40 C.F.R. § 262.16(b)(8)(v) states that the SQG must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

48. At the time of the inspection, the EPA inspector observed insufficient aisle space in the central accumulation area of the facility. Specifically, several containers for hazardous waste were blocked by totes and other containers containing product that made it impossible to access the hazardous waste containers.

49. Because Respondent failed to comply with the generator requirements as set forth in Paragraphs 36 through 48 above, Respondent was not authorized to accumulate hazardous waste at its facility for any length of time, 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

50. 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.

51. 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.

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

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

54. Respondent consents to receiving an electronic copy of the filed Consent Agreement and Final Order at the following email address: *jbounds2@oreillyauto.com*.

Penalty Payment

55. Respondent agrees that, in settlement of the claims alleged herein, Respondent shall pay a civil penalty of nineteen thousand seven hundred and ninety-three dollars (\$19,793) as set forth below.

56. 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>.

57. 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

Kate Reitz, Attorney
reitz.katherine@epa.gov.

58. 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 penalty from the date of delinquency until such civil 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).

Effect of Settlement and Reservation of Rights

59. 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.

60. 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.

61. 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.

62. 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.

63. 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.

64. 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.

65. 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.

66. Nothing contained in 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

67. 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.

68. 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.

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

70. 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.

71. 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.

72. 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 above.

COMPLAINANT:

U.S. ENVIRONMENTAL PROTECTION AGENCY

Date

Candace Bednar
Chemical Branch Chief
Enforcement and Compliance Assurance Division

Date

Kate Reitz
Attorney Advisor
Office of Regional Counsel

RESPONDENT:

O'REILLY AUTOMOTIVE INC.

5-6-21
Date


Signature

John Bounds
Printed Name

Corporate EHS Manager
Title

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 Borromeo
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:

Kate Reitz, Attorney Advisor
reitz.katherine@epa.gov

Kevin Snowden, Case Review Officer
snowden.kevin@epa.gov

Copy via Email to Respondent:

John Bounds
Environmental Health & Safety Manager
jbounds2@oreillyautoparts.com

Copy via Certified Mail, Return Receipt Requested to Respondent:

John Bounds
Environmental, Health, & Safety Manager
O'Reilly Auto Parts - Risk Management Department
233 S. Patterson
Springfield, MO 65802

Copy via Email to the State of Iowa:

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

Mike Sullivan, Chief (e-copy)
Contaminated Sites Section
Iowa Department of Natural Resources
michael.sullivan@dnr.iowa.gov

Dated this _____ day of _____, 2021.

Signed