

Exhibit 2

WHITFIELD & EDDY P.L.C.

317 Sixth Avenue, Suite 1200
Des Moines, IA 50309-4195
Telephone 515-288-6041
Facsimile 515-246-1474
www.whitfieldlaw.com

ATTORNEYS AND COUNSELORS AT LAW

Gary Gately	Thomas S. Reavely	Stephen E. Doohen	Ankeny:	West Des Moines:	Of Counsel:
David L. Phipps	Gary A. Norton	Drew J. Gentsch	Mark R. Gray	John A. Templer, Jr.	Harley A. Whitfield
Benjamin B. Ullem	Frank M. Grenard	Kara M. Sinnard	David D. Nelson	Greg A. Naylor	Wendy Carlson
Robert L. Fanter	Brian L. Campbell	Jon E. Kramer		Maurcen Roach Tobin	Ron Adams
Bernard L. Spaeth, Jr.	Mark V. Hanson	B. MacPaul Stanfield	Mt. Pleasant:	Jeffrey D. Stone	George H. Frampton
William L. Fairbank	G. Mark Rice	Maria Ruhtenberg	Philip McCormick	Stephen D. Marso	Denise M. Hill
Robert G. Bridges	Richard J. Kirschman	Robert W. Hancock, Jr.	Danny L. Cornell	Stephen W. Tyler	
Jaki K. Samuelson	John F. Fatino	Nicholas O. Cooper	Alanson F. Elgar	T. Ryan Lamb	Retired:
Kevin M. Reynolds	Jason M. Casini	Erik S. Fisk	Retired		John. C. Eddy
Thomas H. Burke	J. Campbell Helton	John H. Moorlach			A. Roger Witke
Thomas Henderson	Sally A. Reavely	Kimberly S. Bartosh			Timothy J. Walker
Megan M. Antenucci	Anjela A. Shutts	Nicholas S.J. Olivencia			

Direct Line/E-Mail
(515) 246-5582
grenard@whitfieldlaw.com

June 9, 2008

Mary Peterson
United State Environmental Protection Agency, Region VII
901 North 5th Street
Kansas City, KA 66101

Re: Response to Request for Information
Dico Property ("Property")

Dear Ms. Peterson:

As indicated in my telephone conference, our firm has been retained by Southern Iowa Mechanical, L.L.C. ("Southern") in connection with the above matter. At the onset, I think you have a misapprehension of what Southern was doing at the Property. Southern did not consider its activities as demolishing a building, instead, it consider the activities the disassembling of a movable storage structure to be rebuilt on property owned by Southern in Ottumwa. That intent is evident by the fact that Southern purchased the steel structure from Titan Wheel Corporation ("Titan") and agreed, as part of that purchase, to disassemble the building and remove it from the Property.

As will be evident by the answers provided later, Southern was never told that there was any environmental issue involving not only the Property but also the structures it purchased. Further, when you visited the property in September and saw the disassembly in process, neither you nor anyone with your agency informed Southern or any of its employees that there was any restriction on removal. Southern was not told by Titan or any person at Titan of any restrictions with respect to the building and, as I am sure you would agree, had there been any communication with respect to such restrictions, it would have been evident in the purchase agreement drafted by Titan that was signed by Southern. In email correspondence this January which has been provided to you, Titan, itself, acknowledged an internal communications error which resulted in the building sale/disassembly.

Also with Offices: 110 N. Jefferson, Suite 101, Mt. Pleasant, Iowa 52641 • 319-385-9522
213 N. Ankeny Blvd., Suite 100, Ankeny, Iowa 50023 • 515-964-3633
3737 Woodland Avenue, Suite 437, West Des Moines, Iowa 50021 • 515-558-0111

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While it may be true that on March 4, 1994, the EPA issued an order to Dico, Southern was not a party to that order and had no knowledge of the order nor has it received any notice of such an order from any person until your agency sent a copy of on May 29, 2008.

In short, Southern was not aware of any asbestos in the building. Southern was not aware of any polychlorinated biphenyls ("PCB") in the structure. Southern was not aware of any requirement for encapsulation. Southern was not aware that any of the materials that were removed from the structures that it purchased required any special handling of any sort. All of that would have been information uniquely known by Titan, Dico and the EPA, not Southern.

With respect to your information request, please consider the following Southern's responses:

1. Describe the nature of Southern Iowa Mechanical, L.L.C.'s business activities, including previous experience in building demolition and in handling and disposal of PCBs and other hazardous substances.

ANSWER: Southern is not in the demolition business nor is it in the business of handing and disposing of hazardous substances. It is, instead, in the business of industrial maintenance contractor. Repair equipment, changing out equipment, working with pipelines in plant, and working on mechanical systems.

2. What buildings or portions of buildings did Southern Iowa Mechanical demolish at the Dico Property and over what time period was each building demolished? Please refer to the Site Map enclosed with this letter as Attachment B for building nomenclature.

ANSWER: Southern did not consider its activities on the Property to be demolition. Instead, as indicated earlier, it thought it was disassembling buildings that were intended and designed to be disassembled and removed them to its property for later use. The structures were purchased from Titan as movable steel buildings.

3. Describe the actions taken to prepare for the building demolition, including:

- a. Were any samples collected for chemical analysis of the insulation or structural components in contact with or close proximity to the insulation?**
- b. Were certain materials identified for special handling and disposal?**
- c. Was a health and safety plan prepared?**
- d. Was an asbestos inspection completed prior to demolition of the buildings?**

ANSWER: No actions were taken to prepare for building removal, therefore, none of the items indicated in paragraph 3 a – e was accomplished by Southern because it had no knowledge that there was any asbestos or chemical involvement with the property since it was not informed of that by Titan or any other person.

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4. Provide copies of all permit applications filed with any local, state or federal agency in connection with the demolition activities and copies of any permits that were issued for the demolition.

ANSWER: No permits were required to Southern's knowledge.

5. Provide copies of all documents relating to actions taken to verify that the disposal facility to which the building insulation was to be sent complied with the acceptability requirements of 40 CFR 300.440.

ANSWER: Southern has no documents that are responsive at this time.

6. Provide copies of all photographs or video recordings taken of the demolition activities.

ANSWER: Southern has no photographs or video recordings of the disassembly of the structure or any activity by Southern at the Property.

7. What information was provided to Southern Iowa Mechanical regarding the presence of contamination in the buildings to be demolished, including PCBs in the building insulation, or the need for any special handling or disposal of any materials? Who provided this information?

ANSWER: Southern was not provided any information by any person with respect to PCBs, asbestos, or any requirement for special handling of materials from the Structures. The only direction given to Southern with respect to the Property was an instruction not to puncture the asphalt under or surrounding the Structures. In January, 2008, it received communications from Titan's environmental consultant (which has been provided) which, for the first time, indicated there was an environmental concern.

8. Describe the terms under which Southern Iowa Mechanical performed the building demolition, including:

- a. Who were the parties to the agreement under which the demolition work was conducted?
- b. Who paid Southern Iowa Mechanical to perform the demolition work?
- c. Who did Southern Iowa Mechanical pay for any salvaged materials?
- d. Under the agreement, who was responsible for providing any notifications to local, state or federal authorities with respect to the work?
- e. Under the agreement, who was required to secure any permits for the demolition?

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- f. **Did the agreement provide for any testing to determine appropriate storage, handling or disposal procedures for any of the demolition debris?**
- g. **Who arranged for transportation and disposal of demolition debris?**

ANSWER: As indicated before, Southern did not enter into an agreement to demolish buildings. Instead, it entered into an agreement to purchase the steel Structures for disassembly as evidenced by Exhibits A and B. Consequently, no payment was made to Southern in connection with the "demolition work" and, instead, Southern paid Titan for the personal property it removed. Since Southern did not consider its activity demolition, no notifications were required and permits were not necessary under the Des Moines Building Code. There were no further agreements other than the agreement that is attached to this response. Materials that were removed from the buildings were disposed of through Waste Management.

9. Identify, by providing the information specified in the enclosed Instructions, each individual Southern Iowa Mechanical officer or employee who participated in making the arrangements to conduct the building demolition and describe the nature of that participation.

ANSWER: Please see attached Exhibit B (previously submitted).

10. Identify, by providing the information specified in the enclosed Instructions, each individual Southern Iowa Mechanical dealt with on behalf of Dico, Inc., Titan Tire, or Titan International in making the arrangements to conduct the building demolition and describe the nature of each individual's involvement in this process.

ANSWER: The only persons involved in the removal of the Structures were employees of Southern.

11. When did the building demolition begin and when was it completed?

ANSWER: The first building that was removed was removed in 2004 and was reinstalled at Southern's site as its shop building. Removal of the additional four structures began on or about June 17, 2007 and was completed by December, 2008.

12. Describe how the buildings were taken down and how the insulation was removed and stored on-site.

ANSWER: The first structure removed in 2004 had no insulation. The other four buildings did have insulation which was removed and stored in the structures until it was removed from the site either by Waste Management or by employees for their own use. The buildings were taken down using scissor lifts, fork lifts, cutting torches and chop saws.

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13. Who transported the materials off-site and who selected the transporter(s)?

ANSWER: The Structures which was purchased by Southern were transported to Southern's property by Southern and DRS Trucking of Oskaloosa, IA. Waste material was removed by Waste Management.

14. Where was the insulation disposed of and who selected the disposal facility(ies)?

ANSWER: Insulation was placed in receptacles provided by Waste Management and was disposed of by Waste Management. Some rolled insulation was removed by Southern Iowa employees for use at their property.

15. EPA has information that not all the insulation was transported to a disposal facility, e.g., that demolition workers took some of the insulation for personal use. What locations other than a disposal facility identified in response to question 14) received insulation from the Dico Property? Identify each individual, including demolition workers, who received any of the insulation.

ANSWER: Sandy Beck (identified in the attached Exhibit) took some insulation. It is also possible Anthony Heisdorffer took some but Southern is not sure of that nor is it aware of anyone else who removed insulation materials.

16. Were certain types of materials salvaged rather than being sent for disposal? If so, what materials were salvaged and how and where were these materials segregated from other materials and what is the current location of these materials? What is the intended disposition of these salvaged materials?

ANSWER: As indicated, the intended purpose of the removal of the structures was to use the steel Structures at Southern's property in Ottumwa, consequently the steel Structures were taken to that property.

17. Was a representative of the property owner present on-site while the demolition work was being conducted? If so, identify, by providing the information specified in the enclosed Instructions, each such representatives and the dates each representative was present on the site.

ANSWER: Various individuals who worked with and for Titan were on the property periodically however that information would have to be obtained from Titan since they were not employees of Southern. There were guards at the gate. Doug Pospisel and Don Brown were also on the site periodically during the removal activities.

18. Provide a list of the names, addresses and telephone numbers of each Southern Iowa Mechanical employee, including part time and temporary employees, who participated in

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the building demolition work on the Dico Property, along with the approximate number of days each person worked at the site.

ANSWER: Please see response to Question 10 and see Exhibit B (previously provided).

19. Provide copies of all documents, including e-mail communications and other documents in electronic form, relating to the building demolition on the Dico Property, including the following:

- a. **information provided by Dico relating to the contamination present in the buildings**
- b. **all contracts with Dico pertaining to the demolition**
- c. **all contracts with Waste Management, Inc. and any other parties relating to transporting the insulation and other demolition debris off the Dico property**
- d. **documents indicating payments received or made in connection with the demolition, such as canceled checks, receipts, electronic bank statements**
- e. **all manifests, weight tickets and other documents indicating when materials were taken off the property, where these materials were taken, how much material was taken, and identify who took the materials.**

ANSWER: Emails and written documents which Southern has have been provided.

20. Describe the instructions provided by Southern Iowa Mechanical to its employees as to how to conduct the demolition activities, especially any special handling procedures for the insulation.

ANSWER: Southern's employees were instructed to remove tin to be loaded and sent to a junk yard, to remove all structural steel to be sent to Southern's property, to roll up insulation and put it in the building until a decision was made as to how to proceed with it, and to put all loose pieces of insulation in dumpsters to be sent by Waste Management to an appropriate facility.

21. Identify, by providing the information specified in the enclosed Instructions, each of Southern Iowa Mechanical's on-site supervisors and the date(s) they were present at the site.

ANSWER: The initial Southern site supervisor was Dirl Carnes. Manny Martinez was present during the balance of the project. Jim Hughes who owns the company stop in and out to check on progress at various times.

22. The two Waste Management Roll Off Dispatch Closed Ticket Displays you provided on April 22, 2008, to Mary Peterson, EPA's Remedial Project Manager for the Des Moines

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TCE Site, appear to identify the individual who requested the pickup as Adam. Copies of these Dispatch Tickets are enclosed as part of Attachments C for your reference. Identify Adam, by providing the information specified in the enclosed Instructions, and describe his responsibilities for demolition work on the Dico Property

ANSWER: Adam" is Adam Hughes. He was an employee of Southern who worked on the project and had a company cell phone so he was instructed to make the phone calls.

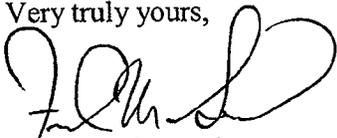
There are very few documents in connection with this matter since it was considered to be a moving of Structures that had been purchased.

No information was provided to Southern by Titan or any other person or entity as to any environmental condition or restriction with respect to the Property, the buildings, or any restrictions on either being imposed as a result of any environmental conditions other than a statement that the asphalt under and around the Structures was not to be removed or damaged.

As you are aware, the information contained above is not certified by me as the attorney for the responding party but is, instead, certified below.

Please feel free to contact me should you have any questions.

Very truly yours,



Frank M. Grenard

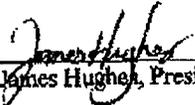
Southern Iowa Mechanical L.L.C. hereby represents that it has reviewed the above information and that the same is accurate and correct.

James Hughes, President

((Please see attached telefaxed signature from James Hughes on behalf of Southern))

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Southern Iowa Mechanical L.L.C. hereby represents that it has reviewed the above information and that the same is accurate and correct.


James Hughes, President