

Exhibit 21

Clyne, Gaye

From: Johnson, Mark
Sent: Tuesday, August 18, 2009 1:42 PM
To: Dan Shiel (shiel.daniel@epa.gov); DeAndré Singletary (singletary.deandre@epa.gov)
Cc: Jeff Brown; Gazi George (gazigeorge@gmail.com); inmann@adams.net; Gary Norton (norton@whitfieldlaw.com); Williams, Brian; Johnson, Mark
Subject: Southern Iowa Mechanical Progress Report
Attachments: 010901 Project Status Report 081409.doc

Dan and DeAndré, attached is the site progress report. Please let us know if you have any questions.

Mark

**Project Status Report
PCB Decontamination Activities
Southern Iowa Mechanical Site
3043 Pawnee Drive
Ottumwa, Iowa**

Submitted to



**USEPA Region VII
Iowa/Nebraska Remedial Branch
Superfund Division
901 North Fifth Street
Kansas City, Kansas 66101**

And



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Prepared by



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August 14, 2009

Situation/Site Background

Southern Iowa Mechanical (SIM) operates an industrial maintenance contracting business on the Site located at 3043 Pawnee Drive in Ottumwa, Iowa. The Site is situated on approximately 2.6 acres in an industrial park area where the surrounding land use is predominantly industrial. On May 16, 2008, EPA conducted an assessment at the Site. EPA alleged that it found PCB contamination present in the location of adhesion areas of old insulation on identified areas of the steel beams stockpiled on the property at concentrations exceeding the standards (1) applicable to non-liquid PCB contamination on non-porous surfaces in high occupancy areas per 40 CFR 761.61(a)(4)(ii) of 10 ug/100cm² (the low occupancy area standard is 100 ug/100cm²); and (2) in one sample of site soils under the metal beam stockpile areas in excess of 1 mg/kg designated for high occupancy areas per 40 CFR 761.61(a)(4)(i)(A) (the low occupancy area standard is 25 mg/kg). In EPA's Quality Assurance Project Plan ("QAPP") for the May 16, 2008 assessment, EPA declared that the standards for "low occupancy areas" should be applied to the Site. *(Dico/Titan reserve their position that EPA's choice of the high occupancy standards is incorrect).* In June or July 2008 at the EPA's request, SIM installed a temporary fence to restrict access to the metal beam stockpile areas, which constitutes the only previous action taken at the Site.

Greenleaf Environmental Services, LLC (GES) was engaged by Mark Johnson of Stinson Morrison Hecker LLP, whose clients are Dico, Inc., and Titan Tire Corporation (collectively Dico/Titan), to perform removal actions at the Site in accordance with the Unilateral Administrative Order (UAO) for Removal Response Activities issued by the United States Environmental Protection Agency (EPA) Region VII. GES prepared and submitted the site Work Plan and affiliated documents, receiving EPA approval and authorization to proceed with site activities on June 5, 2009.

Progress/Prior Reporting Period (s) Summary of Activities

Per the site Access Agreement, SIM required 10 day notification prior to accessing the property for implementation of site activities. SIM was provided proper 10 day notification and GES mobilized to site the week of June 22, 2009 to commence set setup and subsequent implementation of site activities. GES personnel completed segregating metal beams from the site stockpiles and visually inspecting the beams for residual insulation or adhesives. To date a total of 2,281 metal beams have been segregated from the site stockpiles and visually inspected to determine that 726 (32%) of the metal beams contained no residual insulation or adhesives and 1,555 (68%) of the metal beams contained visible residual insulation or adhesive and were relocated to the decontamination staging area for subsequent removal of the visible insulation and adhesive residues and decontamination of the portions of the metal beam that contain the visible insulation and adhesive. Metal beam decontamination activities to remove the visible insulation and adhesive residues and decontaminate the portions of the metal beam that contain the visible insulation and adhesive commenced on July 9, 2009 completing decontamination of 1,555 (100%) of the metal beams visually inspected to contain residual insulation or adhesives.

Analytical results from the first site sampling event conducted the week of July 20, 2009 by Independent third party sampling was performed by 21st Century Resources and the EPA. The EPA insisted on biased sampling, that was not according to the Site work plan and/or any EPA guidance document specified in the EPA approved Site work plan. These tests indicated 16 of the 57 metal beams wipe sampled exceeded the 10 ug/100cm² PCB concentration for high occupancy areas established by the EPA as the Site clean up criteria. These 16 metal beams were relocated

to the decontamination staging area for decontamination of the portions of the metal beam that contained any insulation and adhesive. In addition, the other 144 metal beams representing the sample groups of these 16 metal beams were re-inspected and, as determined by visual inspection, relocated to the decontamination staging area for decontamination of the portions of the metal beam that contained any insulation and adhesive.

The second site sampling event was conducted during the week of August 10, 2009. Independent third party sampling was performed by 21st Century Resources and the EPA on 24 of the metal beams which visual inspection revealed no indication of residual insulation or adhesive. The metal beams were sampled to verify PCB concentrations do not exceed 10 ug/100cm² in accordance with 40 CFR 761.123, again using the EPA's biased sampling and recommended wipe method, a "grab" sample was collected from ten (10) percent of the metal beams visually identified not to contain residual insulation or adhesives to verify PCB concentration do not exceed 10 ug/100cm². In addition, the soils beneath the former metal beam stockpile areas were sampled to verify PCBs do not exceed the 1 mg/kg cleanup standard (High Occupancy) for the Site. Each former metal beam stockpile area was divided into equal-sized grids, not exceeding 10 feet by 10 feet. A surface soil sample was collected at each grid point and combined into composite samples as identified in the Site QAPP. A total of 33 composite soil samples were collected and submitted to the laboratory for PCB (Aroclor) analysis.

Anticipated Activities During Subsequent Reporting Periods

Complete site operations to remove visible insulation and adhesive residues and decontaminating portions of the metal beam that contain visible insulation and adhesive. Review site sampling analysis performed by 21st Century Resources and the EPA on the remaining ten (10) percent of the metal beams visually identified not to contain residual insulation or adhesives to verify PCB concentration do not exceed 10 ug/100cm² and site soil analysis to verify PCBs do not exceed the 1 mg/kg cleanup standard (High Occupancy) for the Site.

Problems or Unique Situations Encountered

GES personnel returned to the site the morning of 6/30/09 to find their Fabrication Trailer had been stolen overnight. The Ottumwa police were contact and a police report filled. Site security services were procured for patrol of the site during non-working hours to avoid continued disruptions or delays to site operations caused by theft, vandalism and / or sabotage to site supplies, materials and equipment.

Personnel air monitor sampling results from the metal beam decontamination area continue to be less than reportable detection limits for the NIOSH 5503 analytical method performed by Galson Laboratories. Site activities continued with no OSHA Recordable or Lost Workday incidents.

Estimated Completion Date

August 21, 2009