

Exhibit 19



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October 17, 2008

VIA FACSIMILE AND U.S. MAIL

Kathleen Montalte
Freedom of Information Officer
EPA, Region 7
901 North 5th Street
Kansas City, Kansas 66101

Re: Southern Iowa Mechanical Site, Ottumwa, Iowa -- Freedom of Information Act Request

Dear Kathleen:

Please consider this letter to be a formal Freedom of Information Act request. Attached is a letter I sent to Dan Shiel this afternoon, in which I requested various matters as a follow-up to previous requests I have made on October 2 and 6, 2008, relating to the Southern Iowa Mechanical Site in Ottumwa, Iowa.

To summarize the FOIA requests I have made in the attached letter to Mr. Shiel, we are requesting the following:

- With respect to "soil sample number 9" in the May 30, 2008, Transmittal of Sample Analysis Results for ASR #: 3867 (Project ID: MP072504; "Project Description: Des Moines TCE Site Insulation and wipe sampling") (the "laboratory report"), from Daksha Datal to Mary Peterson, please produce any photographs or documents depicting or describing the size, shape, appearance and/or location of the material reported as "soil sample number 9," including any photographs or documents that depict or describe the sampled material, what it looked like, how large it was (by volume, area and/or weight), and where it was located.
- With regard to the same laboratory report, please produce all applicable laboratory procedures, protocols or guidelines that explain why the lab values generated from the GC/EC analyses of the 100-square-centimeter wipe samples conducted for this report were purportedly reported in values per square centimeter, and why those values had to be multiplied by 100 in order to reflect the results for an analysis of a standard 100 square centimeter wipe sample.

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File Correspondence 758803-0032

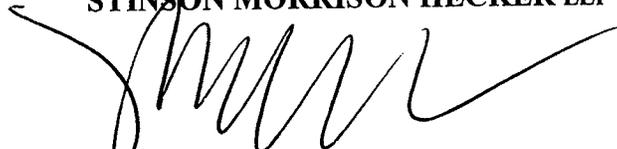
Kathleen Montalte
October 17, 2008
Page 2

You are authorized by this request to send me the above up to a maximum of \$100. If it appears that this request will exceed \$100, please call me for authorization.

Please let me know if you have any questions. Thank you.

Sincerely,

STINSON MORRISON HECKER LLP

A handwritten signature in black ink, appearing to read 'Mark E. Johnson', written over the printed name below.

Mark E. Johnson

Enclosure

cc: Daniel J. Shiel
Frank Grenard
Gary Norton

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