Exhibit 25

Final Project 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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1.0 INTRODUCTION

On January 16, 2009, Mark Johnson of Stinson Morison Hecker LLP submitted a written response on behalf of his clients, Dico, Inc. and Titan Tire Corporation (collectively Dico/Titan) (Appendix A, Exhibit 1). This written response addressed: (1) the Unilateral Administrative Order for Removal Response Activities (UAO) issued on December 30, 2008 for the Southern Iowa Mechanical (SIM) Site; (2) the Enforcement Action Memorandum (Action Memo) requesting a Time-Critical Removal Action at the SIM Site, approved by Cecilia Tapia, dated December 30, 2008; and (3) the cover letter for the UAO (Cover Letter) and Action Memo from Ms. Tapia, dated December 30, 2008 (Appendix A, Exhibit 2). In addition to several reasons why Dico/Titan have no liability, this written response indicated that EPA's most appropriate, cost effective remedy for the SIM Site was the TSCA-compliant solvent wash (40 CFR 761.79) previously outlined in Mark Johnson's letter of November 10, 2008. Furthermore, Mr. Johnson indicated that his clients remained willing to negotiate a resolution that would include undertaking that remedy, without admitting liability. Finally in this written response, Mr. Johnson stated that in order to avoid the punitive financial penalties that may be imposed if his clients failed to comply with EPA's mandates, Dico/Titan would comply with the UAO if EPA refused to consider or accept the matters raised in the written response.

Greenleaf Environmental Services, LLC (GES) was engaged by Mark Johnson of Stinson Morrison Hecker LLP, whose clients are Dico/Titan, to investigate various allegations of the EPA in 2007-2009 and to perform removal actions at the Ottumwa Site in accordance with the Unilateral Administrative Order (UAO) for Removal Response Activities issued on December 30, 2008, by the United States Environmental Protection Agency (EPA) Region VII.

2.0 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 isolated industrial park area where the surrounding land use is predominantly industrial.

In March 2008, Greenleaf Environmental Group, Inc. was contracted to perform removal activities at two different locations, Malcolm and Grinnell, Iowa, to locate and remove EPA-alleged PCB insulation that was relocated from the Southern Iowa Mechanical (SIM) site in Ottumwa, Iowa to the personal properties and residences of SIM employees. Although the sample analysis of the insulation indicated PCB concentrations of 1.18mg/kg and 0.57mg/kg respectively (well below the 50mg/kg regulatory threshold), at the direction of EPA, all insulation removed from 1278 Old Six Road in Malcom, Iowa and 755 460th Avenue in Grinnell, Iowa was loaded on permitted DOT HAZMAT 30-yard end-dumps, properly manifested, placarded and transported to US Ecology's Beatty, Nevada landfill (an EPA-approved TSCA landfill, for disposal at a cost of approximately $ 30,375.12, in spite of the fact that TSCA rules acknowledge that this material was non-PCB waste. The Work Summary Report for these activities is included in Appendix B of this report.

On May 16, 2008, the EPA conducted an assessment at the SIM Site and alleged that PCB contamination was present at some points of adhesion areas of old insulation on the structural steel beams stockpiled in an open field on the property. Such points were chosen by EPA on a non-statistical and biased basis. The EPA alleged that certain PCB concentrations exceeded 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/100cm^2 (the low occupancy area standard is 100 ug/100cm^2); 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). Soon thereafter, at the EPA's request, SIM installed high visibility temporary fence to restrict access and identify the three locations where the structural steel beams were stored in an open field.

In the EPA's Quality Assurance Project Plan (QAPP) for the May 16, 2008 assessment, the EPA declared that the standards for "low occupancy areas" should be applied to the Site; but assigned the "high occupancy standards" in the UAO *(Dico/Titan reserves their position that the EPA's choice of the high occupancy standards is incorrect)*. Based on knowledge and experience, GES believes that the EPA erroneously selected high occupancy, rather than low occupancy, cleanup standards for the Site removal action.

3.0 WORK PLAN PREPARATION AND APPROVAL

In a letter dated January 23, 2009, Mr. DeAndré Singletary, the EPA Remedial Project Manager (RPM), informed Mr. Johnson that the UAO was in effect and in order to comply with the submittal deadlines, EPA must receive the following:

(1) Information to identify the Dico/Titan Project Coordinator within five calendar days,
(2) Names and qualifications of contractors retained to perform the work within ten calendar days; and
(3) Work Plan and related documentation submittal within twenty-one calendar days.

In accordance with paragraph 26 of the UAO, Mark Johnson Esq. submitted Mr. Jeff Brown, CHMM, of GES as the Dico/Titan Project Coordinator on January 27, 2009 and, in accordance with paragraph 24 of the UAO, submitted the GES contractor qualification package to the EPA on January 29, 2009.

On February 10 2009, Mr. Johnson submitted the Site Work Plan and affiliated documents (Appendix C) prepared by GES in accordance with Section X of the UAO. GES received notification from the EPA on March 23, 2009 disapproving the Site Work Plan submission in part and requesting that the submission be modified (Appendix A, Exhibit 3). The EPA comments and revisions were addressed and the modified Site Work Plan was re-submitted to the EPA on April 1, 2009. GES received notification from the EPA on May 4, 2009 approving the submittal with the exception of the Quality Assurance Project Plan (QAPP), which the EPA disapproved and directed GES to modify (Appendix A, Exhibit 4). GES issued a response on May 8, 2009 to address the comments outlined in the EPA's review of the QAPP (Appendix A, Exhibit 5), receiving email notification on May 22, 2009 that the QAPP was sufficient and only required the following changes: (1) addition of a signature line on the title page for the EPA Quality Assurance Manager and, (2) Reference 40 CFR § 761.123 in Section 5.1 regarding Metal Surface Sampling (Appendix A, Exhibit 6).

GES prepared and submitted the final site Work Plan and affiliated documents (Appendix C) on May 28, 2009. EPA approved and authorized GES to proceed with Site activities on June 5, 2009 (Appendix A, Exhibit 7) and to coordinate Site mobilization activities with the RPM, Mr. Singletary.

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4.0 SUMMARY OF ACTIVITIES

After receiving EPA approval and authorization to proceed with Site activities on June 5, 2009 (Appendix A, Exhibit 7) and providing SIM proper 10 day notification for Site access, GES coordinated Site mobilization activities with Mr. Singletary and prepared for Site mobilization the week of June 22, 2009 to commence setup and subsequent implementation of Site removal activities.

4.1 Site Mobilization and Setup

A partial crew consisting of four GES personnel mobilized to the SIM Site on Monday, June 22, 2009 to commence installation and setup of the temporary facilities to support the response action. Once mobilized to the Site, GES performed a thorough Site review to identify Site staging areas for metal beam segregation and decontamination operations.

To overcome inclement weather and heavy rains that frequently hampered Site set up activities and limited Site access, GES personnel received and placed numerous loads of gravel to construct a Site access road, staging areas for decontamination equipment and placement pads for the office trailer, equipment trailers and storage containers. Once gravel placement was completed, the office trailer was placed and connected to the Site generator and support zone (SZ) setup was continued with the placement of fabrication and equipment trailers and the storage container on the gravel entrance to the exclusion zone (EZ).

A twelve yard trash dumpster was delivered to the Site and placed in the support zone for discard of general refuse and portable toilets setup for the GES crew. Concurrently with gravel placement, GES personnel repaired and reinstalled the damaged high visibility temporary fence previously installed by SIM to restrict Site access, properly demarcate the exclusion zone and identify the three locations where the structural steel beams were stored on the west side of the property. In addition, GES personnel cleared vegetation inside the exclusion zone for the Site staging areas identified for metal beam segregation and decontamination operations and from around the stockpile areas to provide access to segregate the metal beams. Once the identified staging areas were cleared, containment areas were constructed with 6-mil polyethylene sheeting to place the metal beams segregated from the Site stockpiles.

GES personnel, in liaison with Dico/Titan and Mark Johnson Esq., insured that the east side of the property still being operated by SIM was excluded from all operations. Previous observations supported by photographs indicated the presence of a large dirt pile filled with scrap metal and sitting adjacent to capacitors, old oil-filled transformers and unlabelled drums full of unknown chemicals. Since the structural metal beams were already stockpiled on the west side of the property, GES did not have to conduct any activities and/or sampling on the east side of the property to fully perform all removal actions in accordance with the Unilateral Administrative Order for Removal Response Activities (UAO) issued on December 30, 2008 for the SIM Site.

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4.2 Metal Beam Stockpile Segregation

From June 26, 2009 to August 18, 2009, GES personnel segregated the metal beams from the Site stockpiles utilizing rubber-track crawler loader forklifts and thoroughly inspected the beams for residual insulation and/or adhesive residues per the EPA-approved Work Plan. Each metal beam was numbered consecutively to create a unique identification system for Site tracking, testing and documentation purposes. If visual inspection revealed no indication of residual insulation or adhesive residues, the metal beam was transported from the existing stockpile and placed on the 6-mil polyethylene sheeting in the designated segregation and sampling areas.

If a metal beam contained residues of visible residual insulation or adhesive residues, the beam was relocated to the decontamination/staging area and placed on 6-mil polyethylene sheeting for subsequent removal of the visible insulation and adhesive residues and decontamination of the portions of the metal beam that contained the visible insulation and adhesive according to the approved EPA-approved Work Plan.

As indicated in the Inspection and Decontamination Summary Spreadsheet (Appendix D), a total of 2,281 metal beams were segregated from the Site stockpiles and visually inspected. It was determined that 726 (32%) metal beams contained no residual insulation or adhesive residues and the remaining 1,555 (68%) metal beams required minimal removal of visible insulation or adhesive residues and decontamination of the portions of the metal beams according to the EPA-approved Work Plan. The following table illustrates the material handling dilemmas and obstacles associated with the size of the metal beams encountered in the stockpiles at the SIM Site.

Metal Beam Size	Approximate Number of Beams	Representative Percentage of Total Beams
35' - 45' Length Roof Trusses	60	3 %
25' Length H Pile Roof Truss Column Supports	150	7 %
10' – 12' Length Roof Truss Column Supports & Tails	32	1 %
12' – 25' Length Girts & Purlins	2,039	89 %

Inclement weather and above normal, heavy rainfalls hampered metal beam stockpile segregation activities by causing long delays during the workdays and even several all day Site shutdowns throughout the course of the project.

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4.3 Metal Beam Decontamination Activities

Following the July 4th holiday weekend, GES mobilized additional crew members to the Site to commence metal beam decontamination activities. GES personnel constructed a metal beam decontamination area, in accordance with the EPA-approved Work Plan, by placing two layers of 6-mil polyethylene sheeting on the ground and covering it with gravel prior to erecting a tent structure, as a shelter from adverse weather conditions, with additional poly sheeting to enclose the whole metal beam decontamination area to mitigate the spread of potentially contaminated dust and other particulate matter resulting from mechanical grinding. The inclement weather, above normal heavy rainfalls and high winds required the mobilization of two additional storage containers that were placed on each side of the constructed decontamination area to provide a wind break and prevent additional costly delays to rebuild the decontamination area.

Additional engineering controls were implemented by utilizing a Vac-Pac® High Performance H.E.P.A Vacuum/Drumming System designed to support the Pentek line of dustless surface decontamination equipment for vacuum recovery and immediate containerization of dust and particulate matter resulting from the metal beam decontamination activities (Appendix E - Vac-Pac® High Performance H.E.P.A Vacuum/Drumming System specifications). All wastes generated from the above decontamination activities were accumulated in DOT compliant containers for offsite disposal and labeled as PCB waste scheduled for incineration.

As indicated in the Inspection and Decontamination Summary Spreadsheet (Appendix D), a total of 1,555 (68%) metal beams required minimal removal of visible insulation or adhesive residues and decontamination (using the Vac-Pac® **system)** of the portions of the metal beams, in accordance with the EPA-approved Work Plan, to meet the requirements set in 40 CFR 761.79 for non-porous surfaces in contact with non-liquid PCBs (including non-porous surfaces covered with a porous surface, such as paint), to Visual Standard No. 2, Near-White Blast Cleaned Surface Finish, of the National Association of Corrosion Engineers (NACE). Metal beam decontamination activities to remove any visible insulation and adhesive residues commenced on July 7, 2009 and were completed the week of August 17, 2009 in coordination with and under the observation of the EPA on-site representatives.

Appropriate personnel air monitoring was implemented according to the Health and Safety portion of the EPA-approved Work Plan during all metal beam decontamination activities to ensure proper selection of engineering/administrative controls, work practices, and/or PPE to protect workers from any potential particulate and/or PCB concentrations at levels that might be at or above permissible exposure limits (PEL). This continuous monitoring for all workers involved in grinding activities showed that air monitoring sampling results were below reportable detection limits according to NIOSH 5503 analytical method performed by Galson Laboratories (Appendix F).

4.4 Site Sampling Activities

Advance notification of Site sampling activities was provided to coordinate schedules with 21st Century Resources, an independent third party sampling contractor, and the EPA on-site personnel, Site sampling activities (Appendix G - PCB Sampling Activities Report) consisted of:

1) Wipe sampling for greater than or equal to 10% of the metal beam population that visual inspection revealed no indications of insulation or adhesive residues to verify that PCB concentrations did not exceed 10 µg/100 cm^2 designated for high occupancy areas (40 CFR 761.61(a)(4)(ii)) and erroneously assigned by EPA Region VII as the Site cleanup standard.
2) Sampling soils beneath the existing metal beam stockpile areas to verify PCBs did not exceed 1 mg/kg designated for high occupancy areas (40 CFR 761.61(a)(4)(i)(A) and erroneously assigned by EPA Region VII as the Site cleanup standard.

4.4.1 Metal Beam Sampling

In accordance with the EPA-approved QAPP, the wipe sampling method was to collect indiscriminate "grab" samples from ten (10%) percent of the metal beams visually identified not to contain insulation or adhesives residues in order to verify that total PCB concentration do not exceed the imposed concentration of 10 µg/100 cm^2 designated for high occupancy areas. Of the 726 metal beams that contained no insulation or adhesives residues, 81 (approximately 11%) were selected for wipe sampling and verification, exceeding the 10% sampling requirement in the EPA-approved work plan and QAPP.

The 81 numbered metal beams were visually inspected again to ensure the absence of any insulation or adhesive residues; they were transported from the existing site stockpiles and placed on the 6-mil polyethylene sheeting in the metal beam sampling area where they were labeled with an alphabetic number to indicate the top (T), bottom (B), right (R) and left (L) sides of each beam to establish the unique sample identification location on each beam, as indicated in the EPA-approved QAPP.

In an August 20, 2009 letter, (Appendix A, Exhibit 8) Mark Johnson Esq. of Stinson Morrison Hecker LLP, notified the EPA Region VII that the biased site sampling enforced by EPA site personnel was not in accordance to the EPA-approved Work Plan and QAPP, which specified an indiscriminate "grab" sample was the specified method for sampling. The EPA on-site personnel conducted abundant biased sampling by selecting the metal beam sampling locations in non-statistical, non-representative, non-Work Plan and non-QAPP compliant zones, including, but not limited to, small corner locations and incorporating beam edges that did not preserve the necessary EPA required sampling zone of 10 x 10 cm linear measurements.

Upon consultation with Mark Johnson Esq., 21st Century Resources, the independent third party sampling contractor, complied with EPA directives and sampled the metal

beams at the EPA-enforced locations. GES firmly believes that such directives by the EPA were arbitrary, capricious and resulted in:

(1) Distortion of the overall Work Plan, causing confusion among Site workers.
(2) Biased sampling results that included non-statistical, non-representative and non-area compliant zones on the beams.
(3) Violation of the express terms of the EPA-approved Work Plan and Quality Assurance Project Plan (QAPP).
(4) Increased costs in labor, effort and excessive processing of beams that would have, otherwise, passed if properly sampled under the EPA Region VII approved Work Plan and QAPP.
(5) Creation of a clear deviation in the unique sampling numerical identification as established in the EPA-approved QAPP. GES and 21st Century Resources conferred with EPA to resolve the confusion by the addition of an "E" in the sample identification number to indicate that the 100cm^2 wipe sample area incorporated an edge of the metal beam being sampled.

4.4.2 Wipe Sampling Event (July 14, 2009)

Independent third party sampling was performed by 21st Century Resources and the on-site EPA personnel on 6 of the metal beams that visual inspection revealed the absence of insulation or adhesive residues. This preliminary wipe sampling event included the collection of six biased wipe samples for the purpose of verifying the efficiency of metal beam segregation, visual inspection and decontamination techniques. All sampling locations were selected by Mr. William Gresham (EPA, Environmental Scientist, RPM SUPR/IANE). Sample identification designation for this event was inadvertently in feet and not by grid number (Appendix G - PCB Sampling Activities Report). Analytical results from this sampling event indicated that 2 of the 6 metal beams wipe sampled exceeded the 10 µg/100 cm^2 PCB concentration for high occupancy areas erroneously established by the EPA as the Site cleanup standard. The 2 metal beams were relocated to the decontamination staging area for grinding of the EPA-directed "hot areas" marked on the metal beam containing any insulation or adhesive residue.

4.4.3 Wipe Sampling Event (July 21, 2009)

At the request of the EPA site personnel, the first site sampling event was scheduled to be conducted during the week of July 13, 2009; however, this was delayed until the week of July 20, 2009, per the request of EPA, resulting in additional costs, to ensure the presence of adequate EPA representation at this event (Appendix A, Exhibit 9). Analytical results from this biased sampling event indicated that 16 of the 57 metal beams wipe sampled exceeded the 10 µg/100 cm^2 PCB concentration for high occupancy areas. Eventually, the 16 metal beams were relocated to the decontamination staging area for grinding of the EPA-directed "hot areas" marked on the metal beam containing any insulation or adhesive residue. In addition, the corresponding 144 metal beams representing the "failing" 16 sample groups of the corresponding 16 sampled metal beams were visually re-inspected and, as determined by visual inspection, relocated to the decontamination

staging area where they were processed individually to meet the near white metal surface requirement as specified for POROUS surfaces in spite of EPA Region VII assignment of "Non Porous" surfaces standards throughout the Work Plan. (Appendix G - PCB Sampling Activities Report)

4.4.4 Wipe Sampling Event (August 11, 2009)

Independent third party sampling was performed by 21st Century Resources and the on-site EPA personnel on 24 of the metal beams that visual inspection revealed the absence of insulation or adhesive residues. The analytical results indicated that none of the 24 metal beams sampled exceeded the 10 µg/100 cm^2 PCB concentration designated for high occupancy areas. (Appendix G - PCB Sampling Activities Report).

4.4.5 Site Soil Sampling (August 12, 2009)

Soils beneath the former metal beam stockpile areas were sampled to verify PCBs did not exceed the 1 mg/kg designated for high occupancy areas (40 CFR 761.61(a)(4)(i)(A) and erroneously assigned by EPA Region VII as the site cleanup standard. Each of the three (3) former metal beam stockpile areas was identified by the capitalized alphabetic letters A, B and C, respectively. The former metal beam stockpile areas were then divided into equal-sized grids that did not exceed the 10 feet by 10 feet dimension. In the presence of EPA Region VII representatives, a surface soil sample (0" to 1" depth) was collected at each grid point and combined into composite samples for laboratory submission and subsequent PCB testing, as identified in the EPA-approved QAPP.

A total of 33 composite soil samples and 4 background soil samples were collected by 21st Century Resources, as observed by the EPA. These were submitted to the laboratory for total PCB (Aroclors) analysis. The analytical results indicated that none of the 33 composite soil samples or the 4 background samples exceeded the 1.0 mg/kg PCB designated for high occupancy areas (40 CFR 761.61(a)(4)(i)(A). (Appendix G - PCB Sampling Activities Report).

4.5 Conclusion of Site Activities

At an earlier date (May 16, 2008), the EPA conducted an unannounced and secret Site assessment at the property and alleged that one sample of Site soils under the metal beam stockpile areas, tested in excess of 1.0 mg/Kg designated for high occupancy areas per 40 CFR 761.61(a)(4)(i)(A). Conversely, the analytical results from the independent third party sampling, witnessed by EPA personnel, of Site soils indicated that none of the 33 composite soil samples or the 4 background soil samples exceeded the 1.0mg/kg PCB designated for high occupancy areas (40 CFR 761.61(a)(4)(i)(A). (Appendix G - PCB Sampling Activities Report). Therefore, the Site soil sampling conducted in accordance with 40 CFR 761.283(b)(3) and 40 CFR 761.289 provide **no** analytical evidence to support the EPA allegations that the stockpiled metal beams have had any impact on the Site soils within or around the former stockpile areas. This was confirmed in the EPA's Results of Lab Analysis dated October 7, 2009 (Appendix A, Exhibit 10) from the split

samples taken by the EPA during the Site removal action. The results show that none of the EPA samples exceeded the 1 PPM PCB standard. Even below the standard, none of the EPA samples found any Aroclor 1260 while they found some Aroclor 1248 and/or Aroclor 1254.

On August 21, 2009 the GES Project Coordinator, Mr. Jeff Brown, sent a voicemail and email notification (Appendix A, Exhibit 11) to the EPA Remedial Project Manager, Mr. DeAndré Singletary, that all the Site soil sample results were well below the 1 mg/kg PCB cleanup criteria arbitrarily enforced on the Site soils. Mr. Singletary returned Mr. Brown's call later that evening to acknowledge that no Site excavation would be required due to the 100% pass rate of Site soil samples and agreed to meet Mr. Brown at the Site on Tuesday, August 25, 2009 for a final site evaluation and demobilization task review. However, after mobilizing to the SIM Site on Monday, August 24, 2009, Mr. Brown received a courtesy call from Mr. Singletary stating that he was not mobilizing to the SIM site and there was no need for a final site evaluation or demobilization task review.

In addition, Mark Johnson Esq. of Stinson Morrison Hecker sent a confirmatory written notification (Appendix A, Exhibit 12) to the EPA Remedial Project Manager, Mr. DeAndré Singletary, requesting EPA authorization to commence demobilization activities. On Monday, August 24, 2009, the EPA acknowledged receipt of the demobilization request (Appendix A, Exhibit 13) and GES personnel completed Site demobilization on Friday, August 28, 2009.

Dico/Titan have fully performed all removal actions in accordance with the Unilateral Administrative Order for Removal Response Activities (UAO) issued on December 30, 2008 for the SIM Site. Therefore, the submittal of this Final Report in accordance with paragraphs 46 and 76 of the UAO should result in issuance of the completion notice by the EPA.

5.0 TRANSPORTATION AND DISPOSAL

In direct coordination with the on-site EPA representatives and in compliance with the approved Work Plan, GES managed and coordinated transportation and disposal (T&D) services for all wastes generated during removal activities at the Site, including, but not limited to, soil, insulation and adhesive backing foils, solids recovered in decontamination, as well as the PPE utilized during the removal operations. Waste materials classified as PCB waste that might exceed 500mg/Kg such as the grindings from the Vac-Pac® system were properly stored in approved containers, shipped via EPA licensed TSCA haulers and disposed of at Clean Harbors TSCA incinerator in Aragonite, Utah which was deemed acceptable by the EPA to receive CERCLA off site, TSCA waste (Appendix A, Exhibit 14). Other wastes that tested Non-TSCA/Non-RCRA regulated were properly disposed of at the Subtitle D, Metro Park East Sanitary Landfill in Mitchellville, Iowa, deemed acceptable by the EPA to receive CERCLA off site, non-hazardous wastes. All disposal profile sample analysis results collected by 21st Century Resources, Inc. are provided in the PCB Sampling Activities Report, Appendix G of this report. The T&D cost for all wastes generated during removal activities at the Site totaled $ 9,833.73. All completed waste disposal information is provided in Appendix H and summarized in the table below:

Description	Disposal Facility	Quantity Transported for Disposal
Soil & Debris (<1ppm PCB)	Metro Park East Sanitary Landfill, 12181 NE University Avenue, Mitchellville, IA 50169.	15.9 Tons
PCB Debris & Insulation (PCB > 50 ppm)	Clean Harbors, Aragonite, P.O. BOX 22890 Salt Lake City, UT 84122 EPA ID # UTD981552177	4 drums
Soil & Debris (<50 PPM PCB)	Metro Park East Sanitary Landfill, 12181 NE University Avenue, Mitchellville, IA 50169	4 drums

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6.0 HEALTH AND SAFETY

Appropriate personnel air monitoring was implemented and maintained during metal beam decontamination activities to ensure proper selection of engineering/administrative controls, work practices, and/or PPE to insure that workers were not exposed to PCB concentrations at levels that exceeded permissible exposure/dose limits or published exposure levels. All personnel air monitoring sampling results from the metal beam decontamination area were less than reportable detection limits for the NIOSH 5503 analytical method performed by Galson Laboratories (Appendix F).

All Site activities were completed without an OSHA Recordable or Lost Workday incident.

7.0 PROBLEMS AND RESOLUTION

a. GES personnel returned to the Site on the morning of 6/30/09 to find the Fabrication Trailer had been stolen overnight. The Ottumwa police were contacted and a police report filled out. 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, samples and equipment.

b. In an August 20, 2009 letter (Appendix A, Exhibit 8), Mark Johnson, Esq. of Stinson Morrison Hecker LLP informed the EPA that the biased site sampling ordered by the EPA was not accordance with the EPA-approved Work Plan and QAPP, which specified indiscriminate "grab" sample was the specified method for metal beam sampling. The EPA conducted biased sampling by selecting the metal beam sampling locations and directing 21st Century Resources, the independent third party sampling contractor, to sample the metal beams at the specified locations, which, as discussed in Section 4.5 of this report is in clear violation of the Site Work Plan and QAPP approved and implemented by EPA.

c. Inclement weather, high winds and above normal heavy rainfalls hampered metal beam stockpile segregation activities by causing long delays during the workdays and even several all day Site shutdowns throughout the course of the project. However, GES personnel implemented additional Site stabilization measures to minimize and prevent additional costly workday delays and Site shutdowns, including:

- Receiving and placing gravel to construct a Site access road, staging areas for decontamination equipment and placement pads for the office trailer, equipment trailers and storage containers.
- Mobilizing of two additional storage containers that were placed on each side of the constructed decontamination area to provide a wind break and prevent additional delays to rebuild the decontamination area.

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8.0 PROJECT FINANCIAL SUMMARY

In the Written Response to Order for Removal Activities dated January 16, 2009 (Appendix A, Exhibit 1), Mark Johnson, Esq. of Stinson Morrison Hecker LLP informed the EPA that his clients, Dico and Titan Tire, reserved all of their rights to challenge the EPA's administrative actions in this matter, including the UAO and the selected remedy, and to seek restitution or reimbursement for all monies paid to comply with the EPA's investigation directives and the mandates under the UAO, and any other remedies available to them in equity or at law. Any definitive final Site costs will be provided by Mark Johnson, Esq. of Stinson Morrison Hecker LLP; however, the following is a summary of the estimated costs for all work associated with the Southern Iowa Mechanical Site:

Contractor	Description	Estimated Costs
Greenleaf Environmental Services, LLC.	UAO Removal Contractor	$ 466,816.05
21st Century Resources	Independent third party sampling	$ 36,961.41
Fibertec Environmental Services	PCB Sample Analysis	$ 7,145.00
Payment and Performance Bond	Surety cost for the performance bond issued on behalf of Dico/Titan	$ 11,625.00
Stinson Morrison Hecker LLP	Attorney fees and expenses	$ 200,000.00
GTS, Inc.	Consultant fees and expenses (Related to EPA-directed collection and analysis of insulation in Malcolm and Grinnell, Iowa ("Dico Insulation Project"), trips to Des Moines and Ottumwa, Site work on behalf of Dico and Titan Tire; and related expenses)	$ 19,000.00
Greenleaf Environmental Group, Inc.	Dico Insulation Project costs before commencement of cleanup at SIM Site	$ 30,375.12
Total Site Costs		$ 771,922.58

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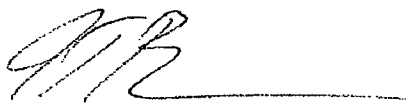
9.0 FINAL REPORT CERTIFICATION

Under penalty of law, I certify to the best of my knowledge, after appropriate inquiries of all relevant persons involved in the preparation of the Final Report, that Dico/Titan have completed the action required by the Order for Removal Response Activities on this Twelfth day of October, 2009, and that Dico/Titan have complied with such Order.

Under penalty of law, I certify that to the best of my knowledge, after appropriate inquiries of all relevant persons involved in the preparation of this Final Report, the information submitted is 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 violations.



Report Preparer Signature

Printed Name: **Jeffrey T. Brown, CHMM**
Title: **Principal, GES**

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