

[Entered by Judge Gregory Hulse,
Feb. 19, 2007.]

IN THE IOWA DISTRICT COURT FOR GUTHRIE COUNTY

STATE OF IOWA, ex rel., IOWA)
DEPARTMENT OF NATURAL)
RESOURCES,)
)
Plaintiff,)
)
vs.)
)
DONALD DEAN WILLIAMS d/b/a)
WILLIAMS OIL COMPANY,)
)
Defendant.)

LAW NO. CVCV080614

**CONSENT ORDER, JUDGMENT
AND DECREE**

The Court is presented with Plaintiff's petition seeking civil penalties and injunctive relief pursuant to Iowa Code sections 455B.477(1) and (3). The Court having read the petition and being otherwise advised by the parties finds:

1. The Court has jurisdiction over the parties and the subject matter of this action and the parties have stipulated and agreed to resolve this action in the manner provided by this Consent Order, Judgment and Decree.
2. Defendant Donald Dean Williams d/b/a Williams Oil Company, admits he violated 567 Iowa Admin. Code 135.7(5), 135.7(5)(e), 135.12(3)(d), 135.12(9), Administrative Order No. 95-UT-29, as amended, Order of Default No. 96DNR-28, and the Court's February 8, 1999 Order in *State ex rel. Iowa Dep't of Natural Res. v. Dean Williams*, Guthrie County No. LACV079300.
3. The parties stipulate Defendant will perform corrective action as described in the attached Tier 3 Work Plan (appendices excluded in attachment), and as modified by the attached June 22, 2006, letter issued by Verne Shrunk. (Exhibits A and B).
4. The parties stipulate to the Court imposing a \$20,000.00 civil penalty against Defendant for the violations described herein.

THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

5. Defendant shall pay a civil penalty pursuant to Iowa Code section 455B.477(1) of Twenty Thousand and no/100 Dollars (\$20,000.00) for the violations alleged in the petition. Payment of the civil penalty and interest shall be made to the Clerk of the Iowa District Court for Guthrie County at Guthrie Center, Iowa. Defendant shall pay interest pursuant to Iowa Code section 535.3(1) on any unpaid balance of the civil penalty not paid pursuant to the payment schedule in this Consent Order, Judgment and Decree.

6. Defendant shall carry out the following procedures:

- (a) Defendant shall perform corrective action as described in the attached Tier 3 Work Plan (appendices excluded in attachment), and as modified by the attached June 22, 2006, letter issued by Verne Shrunk. (Exhibits A and B).
- (b) Defendant shall continue corrective action in accordance with 567 Iowa Admin. Code 135.7-135.12 as directed by the DNR to monitor and remove petroleum contamination at the site until corrective action is no longer required by the DNR.

7. Defendant is hereby permanently enjoined from any further violation of 567 Iowa Admin. Code 135.7(5), 135.7(5)(e), 135.12(3)(d), 135.12(9), Administrative Order No. 95-UT-29, as amended, Order of Default No. 96DNR-28, and the Court's February 8, 1999 order in *State ex rel. Iowa Dep't of Natural Res. v. Dean Williams*, Guthrie County No. LACV079300.

8. This Consent Order, Judgment, and Decree is in full compromise and settlement of all violations alleged in the Petition to have been committed by Defendant.

9. Willful failure to comply with the terms of this Order may subject Defendant to punishment for contempt of court as well as other penalties and sanctions provided by law. The Court, therefore, retains jurisdiction over this matter to ensure compliance with the terms of this Order.

10. Costs of this action are taxed to Defendant in the amount of \$ _____ (Clerk to enter).

11. The Clerk of Court shall mail file-stamped copies of this Consent Order, Judgment and Decree to the parties.

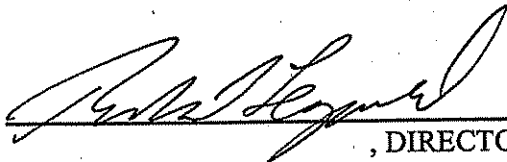
[Feb. 19, 2007]

Dated this _____ day of _____, 2007.

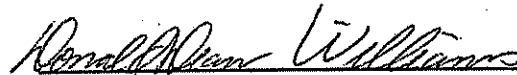
[Judge Gregory Hulse]

Judge, Fifth Judicial District of Iowa


Approved as to form:



, DIRECTOR
DEPARTMENT OF NATURAL RESOURCES




DONALD DEAN WILLIAMS
DEFENDANT



DAVID S. STEWARD, AT0007551
Assistant Attorney General
321 E. 12th, Room 18
Des Moines, Iowa 50319

ATTORNEY FOR PLAINTIFF



MARK C. FELDMANN, PK0001554
321 E. Walnut, Suite 200
Des Moines, IA 50309

ATTORNEY FOR DEFENDANT

TIER 3 WORK PLAN

at

Williams Oil
1403 Front Street
Stuart, IA

LUST Registration No. 8602666
LUST No. 8LTV09

Prepared by:

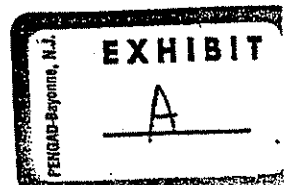
SENECA ENVIRONMENTAL SERVICES, INC.
4140 NE 14TH STREET
DES MOINES, IOWA 50313

Susan Frett
Project Manager, Certified Groundwater Professional #1990

Susan K Frett

Mr. Dean Williams
Williams Oil Company
Responsible Party

Dean Williams



Tier 3 Work Plan
Williams Oil,
1403 Front Street, Stuart, Iowa

GENERAL

The site has been classified as High Risk based upon the discoveries made in completing the 2004 Site Monitoring Report and RBCA Tier 2 Report. These reports determined that the site has one (1) high risk receptor within the Groundwater Ingestion and Soil Leaching to Groundwater Ingestion pathways, thirteen (13) high risk receptors within the Groundwater Vapor pathway, three (3) high risk receptors within the Groundwater to Plastic Water Line and Soil Leaching to Plastic Water Line pathways, seventeen (17) high risk receptors within the Soil Leaching to Groundwater Vapor pathway, fifteen (15) high risk receptors within the Soil Vapor pathway and two (2) high risk receptors within the Soil Vapor to Plastic Water Line pathway that may require Corrective Action using an excavation or elimination using a Tier 3 Report. *Approach*
These receptors are listed in Appendix 1: Tier 2 Receptor Summary.

Summary of High Risk Conditions at the site:

The following Table 1 lists the High Risk Receptors that exist at the site, the lowest SSTLs that apply at the Source, and the proposed actions to remove the High Risk Conditions at these receptors:

Table 1. High Risk Conditions at the site:

Pathway	Receptor (SSTL)	Proposed Action to be Utilized to Remove High Risk Classification
Groundwater Ingestion Groundwater Sources: MW2 (59,000 ppb benzene) MW4 (170,000 ppb toluene) MW4 (1,400,000 ppb TEH-Diesel)	Benzene: City Well (6,575 ppb) Well 1 -NDWW (2,284 ppb) Toluene: Well 1 (52,050 ppb) TEH-Diesel: City Well (239,947 ppb) Well 1 (355,700 ppb)	Quarterly groundwater monitoring to meet steady and declining then use actual plumes and aquifer separation to reclassify risk to the City Well. Well 1 is a non drinking water well and it has been plugged, appropriate documentation will be submitted to reclassify to no risk.
Groundwater Vapor to Confined Space Residential	Benzene: B1 (7,379 ppb) B2 (9,246 ppb) B3 (20,803 ppb) B4 (37,380 ppb) Toluene: B1 (119,936 ppb) B2 (85,277 ppb)	Soil Over Excavation, Post OE Groundwater Sampling
Groundwater Vapor to Confined Space Non Residential	Benzene: B15 (60,071 ppb)	Soil Over Excavation, Post OE Groundwater Sampling
Groundwater Vapor to Sanitary Sewer Residential	Benzene: SS1 (3,140 ppb) SS2 (24,523 ppb) SS3 (26,861 ppb) SS4 (51,579 ppb) SS5 (93,713 ppb) SS6 (41,344 ppb) SS7 (4,627 ppb) Toluene: SS1 (53,130 ppb) SS7 (47,973 ppb)	Soil Over Excavation, Post OE Groundwater Sampling

<p>Groundwater to Plastic Water Line Groundwater Sources: MW2 (59,000 ppb benzene) MW4 (170,000 ppb toluene) MW4 (8,600 ppb ethylbenzene) MW4 (1,400,000 ppb TEH-Diesel)</p>	<p>Benzene: PVC 1 (319 ppb) PVC 2 (3,730 ppb) PVC 3 (12,180 ppb)</p> <p>Toluene: PVC 1 (7,524 ppb) PVC 2 (71,604 ppb)</p> <p>Ethylbenzene: PVC 1 (3,721 ppb)</p> <p>TEH-Diesel: PVC 1 (75,000 ppb) PVC 2 (459,883 ppb) PVC 3 (1,348,219 ppb)</p>	<p>Quarterly monitoring of the static water levels in MW5, MW10, MW13, MW15, and MW16 to prove separation between groundwater and plastic water lines to the north of the site.</p> <p>Soil Over Excavation and Post OE Groundwater Sampling will address the southern plastic water line receptors.</p>
<p>Soil Leaching to Groundwater Ingestion – Drinking Water Wells</p> <p>Soil Leaching Monitoring Well: MW2 (52,064 ppb benzene) MW 4 (76,795 ppb toluene)</p> <p>Soil Source: MW10 (88.6 ppm benzene) MW2 (409 ppm toluene)</p>	<p>Benzene (groundwater): City Well (4,086 ppb)</p> <p>Benzene (soil): City Well (6.96 ppm)</p>	<p>Soil Over Excavation and quarterly groundwater monitoring to meet steady and declining then use actual plumes to document non-expanding plumes and aquifer separation to reclassify risk to the City Well.</p>
<p>Soil Leaching to Groundwater Ingestion – Non Drinking Water Wells</p>	<p>Benzene (groundwater): Well 1 (1,046 ppb)</p> <p>Benzene (soil): Well 1 (1.78 ppm)</p> <p>Toluene (groundwater): Well 1 (49,727 ppb)</p> <p>Toluene (soil): Well 1 (265 ppm)</p>	<p>Well 1 is a non drinking water well and it has been plugged, appropriate documentation will be submitted to reclassify to no risk.</p>
<p>Soil Leaching to Groundwater Vapor – Confined Space Residential</p>	<p>Benzene: B1 (9,413 ppb groundwater) (16 ppm soil) B2 (2,013 ppb groundwater) (3.43 ppm soil) B3 (4,736 ppb groundwater) (8.06 ppm soil) B4 (9,687 ppb groundwater) (16 ppm soil) B10 (35,178 ppb groundwater) (60 ppm soil) B11 (44,966 ppb groundwater) (77 ppm soil)</p>	<p>Direct Push Study to document soil plume definition (vertically and laterally). This should indicate that the extent of the soil contamination does not extend to these receptors. Soil Over Excavation</p>
<p>Soil Leaching to Groundwater Vapor – Confined Space Non Residential</p>	<p>Benzene: B15 (16,116 ppb groundwater) (27 ppm soil)</p>	<p>Direct Push Study to document soil plume definition (vertically and laterally). This should indicate that the extent of the soil contamination does not extend to these receptors. Soil Over Excavation</p>

Soil Leaching to Groundwater Vapor - Sanitary Sewer Residential	<p>Benzene: SS1 (24,033 ppb groundwater) (41 ppm soil) SS2 (10,172 ppb groundwater) (17 ppm soil) SS3 (5,425 ppb groundwater) (9.24 ppm soil) SS4 (11,885 ppb groundwater) (20 ppm soil) SS5 (25,594 ppb groundwater) (44 ppm soil) SS6 (9,107 ppb groundwater) (16 ppm soil) SS7 (3,606 ppb groundwater) (6.14 ppm soil) SS8 (46,743 ppb groundwater) (80 ppm soil) SS10 (45,862 ppb groundwater) (78 ppm soil) Toluene: SS1 (41,475 ppb groundwater) (221 ppm soil) SS7 (62,283 ppb groundwater) (332 ppm soil)</p>	Direct Push Study to document soil plume definition (vertically and laterally). Samples will be collected at a depth of one foot below the receptor and at high PID to prove that the receptor is separated from the contamination. Soil Over Excavation
Soil Leaching to Groundwater to Plastic Water Line	<p>Benzene: PVC 1 (297 ppb groundwater) (1.8 ppm soil) PVC 2 (787 ppb groundwater) (1.8 ppm soil) PVC 3 (3,624 ppb groundwater) (6.17 ppm soil) Toluene: PVC 1 (8,224 ppb groundwater) (120 ppm soil)</p>	Direct Push study consisting of 13 direct push sampling locations along the PVC line on Gaines Street. Samples will be collected at a depth of one foot below the receptor and at high PID to prove that the receptor is separated from the contamination.
Soil Vapor to Confined Space Residential	<p>Benzene: B1, B2, B3, B4, B7, B8 (1.16 ppm) Toluene: B1, B2, B3 (48 ppm)</p>	Direct Push Study to document soil plume definition (vertically and laterally). This should indicate that the extent of the soil contamination does not extend to these receptors. Soil Over Excavation
Soil Vapor to Confined Space Non Residential	<p>Benzene: B15 (2.19 ppm) Toluene: B15 (75 ppm)</p>	Direct Push Study to document soil plume definition (vertically and laterally). This should indicate that the extent of the soil contamination does not extend to these receptors. Soil Over Excavation
Soil Vapor to Sanitary Sewer Residential	<p>Benzene: SS1, SS2, SS3, SS4, SS5, SS6, SS7 (2.32 ppm) Toluene: SS1, SS2, SS3, SS4, SS6, SS7 (96 ppm)</p>	Direct Push Study to document soil plume definition (vertically and laterally). Samples will be collected at a depth of one foot below the receptor and at high PID to prove that the receptor is separated from the contamination. Soil Over Excavation
Soil Vapor to Plastic Water Line	<p>Benzene: PVC 1, PVC 2 (1.8 ppm) Toluene: PVC 1 (120 ppm)</p>	Direct Push study consisting of 13 direct push sampling locations along the PVC line on Gaines Street. Samples will be collected at a depth of one foot below the receptor and at high PID to prove that the receptor is separated from the contamination.

OBJECTIVE

The main purpose of the Tier 3 work plan is to prove the separation between the contamination and the high risk plastic water lines and soil vapor receptors and to show through quarterly sampling that steady and declining conditions and lack of plume migration can reclassify the high risk City Well. If these objectives are accomplished, the DWW, soil vapor receptors and plastic water line may be No Risk. Documentation showing that NDWW-1 was plugged will be submitted within the Tier 3 report as well. Soil Over Excavation will be performed to reduce the contaminants and potentially reclassify the high risk groundwater vapor receptors. The extent of the Soil Over Excavation may be increased to include the soil source areas if the Direct Push Study does not succeed in reclassifying the high risk soil vapor receptors.

WORK PLAN

In order to accomplish the objectives set forth in this document, we plan the following activities for completion of the Tier 3 Report.

Direct Push Study

A Direct Push study will be completed to ensure that the plastic water lines, confined spaces and sanitary sewers are not being impacted by the soil contamination that has been noted on site. Since contaminated soil does not ascend, if soil contamination can be documented as being located at a greater depth than the plastic water line and sanitary sewers, these can be reclassified to no risk for the soil pathways. Historic bore logs (MW10, MW13, & MW5 (please reference Appendix 3) in the area near the water line and sewers suggest that contamination is deeper than 8' bgs in this area. The plastic water line and sewers are noted at 5' bgs which is greater than 3' above the depth of the contamination. The Direct Push study will also further define the soil contamination plume and may show that the confined space receptors are no risk as well.

To complete this soil study several borings will need to be completed along the west side of the plastic water line and sanitary sewer at 10' intervals. The borings will begin at the end of the proposed excavation and will be placed to the north every 10' until contamination is no longer noted. Three soil samples will be taken from each boring, one will be taken directly beneath the plastic water line, and the other two will be taken based on field screening with a MiniRAE 2000. Approximately thirteen borings will need to be completed between the edge of the proposed over-excavation and MW13. Approximately eight soil samples will be sent to Test America for comparison. Attached is a map with the proposed locations of the borings. ok

Groundwater to Plastic Water Line

The groundwater flow direction at this site has been noted to the North. Onsite static water levels are noted at between 2.4' bgs to 8.6' bgs. However, the monitoring wells to the north of the site (MW10, MW12, and MW13), have had groundwater levels between 5' and 7' bgs in the spring and between 9' and 10' bgs in the fall/winter. The static water levels in the monitoring wells to the north of the site remain below the depth of the plastic water line throughout the year. (Please reference Appendix 4 for a table showing the groundwater levels in MW5, MW10, MW13, MW15 and MW16.) The same rules apply for the groundwater pathways as the soil pathways. If a separation can be proven between the groundwater and the receptor, the pathway can be reclassified. To prove this separation, static water levels in the north wells will need to be taken quarterly to ensure that the static water level remains below the depth of the receptors during all seasons. If the results are favorable, the plastic water line can be reclassified. The wells chosen for the static water level separation investigation are MW5, MW10, MW13, MW15, and MW16. Soil over excavation and post over excavation groundwater sampling should reduce the risk for the southern plastic water lines. ok

also document non-expansion of plume. Not just in direction of City Well
also is to address SW vapor to enclosed spaces & SS.

Water Well Receptors

73 Currently at risk are the NDWW-1 and City Well-Jordan. City Well-Jordan is currently a standby well for the City of Stuart. This well was located during the preparation of the Post Tier 2 Evaluation Worksheet. Completion of a Tier 3 documenting steady and declining conditions, aquifer separation and lack of plume migration (in the direction of the well) can be proven through Tier 3 monitoring. A trend analysis on the groundwater concentrations would be able to show the overall declining concentrations at this site. Monitoring wells (source well, transition well, guard well) will need to be assigned for the quarterly requirements out at this site.

ok (1) The non-drinking water well has been noted as plugged; therefore to remove the risk of the well appropriate documentation regarding the well plugging will need to be sent to the IDNR within the Tier 3 implementation report. Either the well owner or the well plugging company should have the information required.

Over-Excavation

(1) Over-excavation in the groundwater source and free product area is suggested as a cost-effective way of removing the soil and groundwater contamination mass at this site. Soil lithology at the site is silty to dense clay, and the site is not considered a protected groundwater source. It has been noted that groundwater adheres to the clay particles, so that upon removal of soil the contaminated groundwater will also be removed. Further excavation should be completed to the south of the previous excavation to MW3 and to the west near free product well MW8. Please see the enclosed map for the location that is outlined for over-excavation. The size of the over-excavation at this time is 1,445 cubic yards. This will be divided into two separate areas with dimensions of 30'x 30'x 20' and 70'x 15'x 20'. According to IAC, Chapter 25, Section 135, Part 11; at minimum soils must be screened with a Photo-ionization detector every 100 square feet of the base and the side wall. Soil samples must be collected every 400 square feet or a minimum of one sample per sidewall and the base. In addition, and according to IDNR guidance, if there are elevated field screening locations (>10 ppm), other than the pre-designated sample locations may be sampled also. Soil samples collected will be analyzed according to Iowa OA1/MTBE methodologies. The excavation will be backfilled with granular material and asphalt and or concrete will be placed at the surface (current conditions). It should be noted that expanding this area may be recommended if the direct push study does not succeed in reclassifying the Soil Leaching to Groundwater Vapor and Plastic Water Line pathways and Soil Vapor to Confined Space and Plastic Water Line pathways. After the over-excavation, monitoring wells MW2, MW3, MW4, MW7, and MW8 will need to be reinstalled. Monitoring wells MW7 and MW8 are not in the monitoring plan that is being requested, however, the wells will need to be continually checked for free product. 135

Groundwater Monitoring Well Sampling

Groundwater sampling has not been completed at MW4 since the previous over-excavation took place in January of 2000. This well is source well for Toluene, Ethylbenzene, Xylenes, TEH-Diesel, and TEH-Waste Oil. The wells within the excavation (MW1 & MW4) area have not been redrilled; therefore the effects of the previous over-excavation on the groundwater are unknown. The IDNR has stated that MW1 will not need to be redrilled, therefore only MW4 will be redrilled after the proposed over excavation is completed. Groundwater sampling was not completed in 2005, therefore current concentrations are not known. Seneca suggests that monitoring wells MW2, MW3, MW4, MW5, MW6, MW10, MW12, and MW13 be sampled quarterly after the over-excavation for a period of 1 year for OA1/OA2/MTBE. Monitoring wells MW2, MW7 and MW8 will be checked monthly for Free Product levels. This information is necessary in determining steady and declining factors and static water levels for the Tier 3 analysis of the plastic water line, sanitary sewer line and City drinking water well. For the City well, if the groundwater analytical data indicates concentrations are steady and declining, actual plumes may be used which may be able to reclassify the risk of the DWW receptor. ok

CONCLUSION

If the Tier 3 Work Plan is accepted by IDNR, Seneca will proceed with the Tier 3 implementation. If all of the above objectives are accomplished, the site may potentially be reclassified to low risk. The following schedule for implementation of the Tier 3 is suggested:

Submittal of Tier 3 Workplan by Seneca to DNR and Williams Oil: June 16, 2006 → rec'd 6-16-2006

Review and Approval or Rejection by DNR: June 30, 2006 *Tr. 2006*

Approval of budget by Williams Oil: June 30, 2006

Direct-Push-Study and-First Round of Static Water Level Information: July 31, 2006.

Soil Over Excavation Completed: October 1, 2006 ~ *08.29.06*

Quarterly Groundwater Sampling (including re-installation of MW2, MW3, MW4, MW7 and MW8) begins: January 1, 2007 and continues for one year sampling MW2, MW3, MW4, MW5, MW6, MW10, MW12 and MW13 for OA1/OA2/MTBE

Submittal of 1st Tier3 SMR and Soil Over Excavation Report: April 30, 2007

Submittal of 2nd Tier 3 SMR: October 30, 2007

6-27-06 - phone call to SF -

GW sampling done on Jan 1st 7 Ms.

- GW sampling should begin 6 months Time Frame -

June 22, 2006

CERTIFIED MAIL

Donald Williams
Williams Oil Co.
219 S Division Street
Stuart, IA 50250

SUBJECT: Tier 3 Work Plan Review – Williams Oil Company
201 West Front Street, Stuart, Iowa
Registration No. 8602666

LUST No. 8LTV09

Dear Mr. Williams:

The DNR received the Tier 3 Work Plan for the referenced site June 16, 2006. The Tier 3 Work Plan submittal is one item-of-agreement from the Corrective Action Teleconference held April 18, 2006. We have evaluated the work plan in accordance with Subrule 567 - 135.11(455B) of the Iowa Administrative Code.

In general the Tier 3 Work Plan is acceptable.

We have the following specific comments:

City Drinking Water Well Portion

The conceptual approach regarding the City Drinking Water well is to document the 'whole' of the plume is not expanding, not just the non-expansion of the plume in the general direction of the City Well. As such, the monitoring plan for this portion of the T3 must be altered. We note the Work Plan monitoring plan for the OE portion of the Corrective Action includes such a scheme. Inclusion/use of these wells for the City Drinking Water well monitoring scheme is necessary.

Corrective Action Monitoring Plan

Groundwater monitoring to address the OE, City Drinking water well, and groundwater vapor to enclosed spaces (basements) portions include monitoring wells MW2, MW3, MW4, MW5, MW6, MW12, and MW14. Monitoring to address the groundwater vapor and soil to plastic water line portions (measuring static water levels) include MW5, MW10, MW13, MW15, and MW16. Monitoring wells MW7 and MW8 will be re-installed to check for the presence of free product.

Implementation

The Implementation Schedule also must be adjusted. The Soil Over-excavation (OE), OE report, and T2 revisions regarding the soil pathways must be submitted no later than October 1, 2006. A date-certain by which OE will begin needs to be provided. Notification via E-mail, or in writing must be made to DNR within 10 days from the start of OE activities.

Implementation Schedule

Submittal of Tier Work Plan by Seneca – June 16, 2006 with DNR receipt June 16, 2006
DNR approval of Tier 3 Work Plan – June 22, 2006
Approval of budget by Williams Oil – June 30, 2006
Direct Push Study and First Round of Static Water Level Information – July 31, 2006



Schedule specifying when OE activities will occur (date) and a date by which OE report/soil pathway T2 revisions (date cannot be later than October 1, 2006) will be submitted – August 1, 2006

Soil Over-excavation Completed – October 1, 2006. *OE report/soil pathway T2 revisions submitted.*

Submittal of 1st Tier 3 SMR – April 30, 2007

Submittal of 2nd T3 SMR – October 30, 2007

The semi-annual T3 Site Monitoring reports must be submitted no later than thirty (30) days following the appropriate quarterly sampling event. A full T3 report, with all appropriate sections completed/included must be submitted. Be advised, unless the T3 monitoring wells were/are identical with those of the accepted T2 SCR, relying/using the SMR software as 'the' evaluation 'tool' to determine the progress and success or failure for the T3 approach is neither appropriate nor acceptable. The expectation is the CGWP will 'process' any and all information in providing a written assessment for progress toward T3 goals.

In all correspondence regarding this project, please include the LUST number, which is indicated in the Subject heading of this letter. If you have questions or we may be of assistance, please contact me (515-281-6704).

Sincerely,

VERNE SCHRUNK
ENVIRONMENTAL SPECIALIST
UNDERGROUND STORAGE TANK SECTION

8v09T3wrkplnrev.doc

C: Field Office 6
GAB Robins
Seneca Environmental Services, P.O. Box 3360, Des Moines, IA 50313