

MEMORANDUM

TO: Des Moines TCE Site File
FROM: Mary Peterson
DATE: May 8, 2008
SUBJECT: Trip Report for Dico Building Demolition Follow-up, April 21-22, 2008

This memorandum documents a trip to Iowa during the period April 21-22, 2008. This trip was conducted as a follow-up to a complaint received by the Iowa Department of Health from workers who had been involved with the demolition of several buildings on the Dico property located at 200 SW 16th Street in Des Moines, Iowa. The purposes of the trip included conducting a site visit at the Dico property to inspect the current status of building demolition and to confirm that the concrete foundations remain intact, and to meet with demolition workers and the owner of the demolition company to gain an understanding of the circumstances surrounding the demolition of certain Dico buildings and to hear the concerns of the workers.

Dico Site Inspection:

On April 21, 2008, I traveled to the site in Des Moines, Iowa, and arrived at approximately 11:30 a.m. At the site, I met with Tom Wuehr with the Iowa Dept. of Health. This site inspection was not previously announced to the site owner, so upon arrival, Tom Wuehr called Brian Mills to arrange for access. Also onsite were Todd Campbell and John Frey, OSCs with EPA Region 7, and Sue Casteel with ATSDR. Brian Mills, representing Dico/Titan, met us at the site and provided access after contacting Gazi George, consultant for Titan, to get permission. Contact information for Brian Mills and Gazi George is as follows:

Brian Mills
Environmental Coordinator
Titan Tire Corporation
2345 East Market Street
Des Moines, IA 50317
(515) 265-9363

Gazi George
(217) 221-4791

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Prior to Brian Mills' arrival, Sue Casteel, Tom Wuehr and I walked along the outer east edge of the property and viewed the concrete slabs where buildings 4 and 5 and the maintenance building used to be (see attached site map). We did not observe any loose insulation on the property and the concrete slabs appeared to be intact, as did the seal coat applied to the concrete surfaces during the 1994 removal action. I took photos of the concrete slabs through the fence. Tom informed me that samples of insulation which he had collected from the site last week tested negative for asbestos.

Upon the arrival of Brian Mills, we walked the entire length of the Dico property and observed the general condition of the buildings. Buildings 4 and 5 and the maintenance building have been completely demolished, as well as the northern portion of the production building. The only portion of the Production building that was demolished was the portion constructed of steel beams and siding, which are salvageable materials. It appears that this portion of the Production building was added at a later date than the original concrete structure. Remaining portions of the Production building are constructed of concrete. I took photos of the remaining concrete slabs for each building that had been demolished.

We walked inside the production building and observed the roof. It is constructed differently than buildings 4 and 5 in that the ceiling insulation is not directly visible; it is covered by a panel of some sort (perhaps aluminum). Insulation in the Production building was not sampled during the investigations conducted in the early 1990's. During the site inspection, we did not enter any of the other remaining buildings. All windows are broken and doorways are removed, which could provide a pathway for the release of any remaining contaminants from the buildings to the environment. The site is fenced and site security is present to restrict access. All photos taken during the site inspection are included as attachment 2.

While there were no visible pieces of insulation on the ground during the inspection, it is possible that small pieces of debris and dust generated during demolition activities could have settled onto the concrete slabs and/or the asphalt cap surrounding the buildings. This material could have been carried by surface runoff during rain events to the South Pond, a low lying drainage area on the site.

Brian Mills asked me to send him the photos I took via e-mail. This was done on Monday, April 28, 2008. We left the site at approximately 12:30 p.m. and headed toward Brooklyn, Iowa to meet with two of the demolition workers.

Meeting with Demolition Workers:

At approximately 2:00 p.m. on April 21, 2008, Sue Casteel, Todd Campbell, John Frey, and I met with Velda Crosby and Sandy Beck, two of the demolition workers who had contacted the IDPH after learning that there were PCBs in the building insulation. The meeting took place at the home of Velda Crosby.

To begin the meeting, I provided some background information about the history of the Des Moines TCE site and the buildings, and shared historical site maps with the workers. From the Dico site maps, the workers identified the buildings they had worked on. I explained to the workers about the PCBs that were found in the building insulation back in the early 1990s, and I explained the removal action that was conducted in the buildings in 1994 to address pesticides and PCBs in the buildings.

I then asked a series of questions and noted their responses. The women indicated that they were employed by Southern Iowa Mechanical (SIM) as temporary employees during the demolition project. Velda had only worked for SIM for a few months performing duties on two jobs (Dico and Cargill). Sandy has worked for SIM on and off for the past 4 years on numerous projects. No health care coverage is provided by SIM. Field supervisors during demolition included Manny Martincz and someone named Darrell. The owner of SIM is Jim Hughes, who was not on site much during demolition. His son, Adam, worked at the site quite a bit.

Velda and Sandy indicated that between 30-50 people worked on the demolition project, some only on weekends. Workers were not provided any protective clothing or respirators. Some workers wore basic work gloves. Sandy and Velda worked mainly in short-sleeved shirts due to the heat. Neither Sandy nor Velda had performed building demolition activities before the Dico project. When asked what they were told about the buildings or the property prior to beginning work at the site, they replied "nothing". The workers indicated that the demolition was conducted by hand without the use of special equipment or machinery.

The workers described the demolition process as follows:

- The outer metal roof was removed and dropped over the side of the building.
- The first layer of insulation was rolled up, dropped over the side of the building, and taken to the production building for storage.
- This first layer of insulation did not have foil backing on it and seemed to be in good condition, so it was set aside for potential reuse.
- The second roof was then removed.
- The inside layer of insulation (with the foil backing) could not be rolled up since it was installed in large squares or bats. These squares of foil-backed insulation were removed by hand and placed into large hoppers or dumpsters with other debris and taken to a landfill by trucks marked "Waste Management". The workers estimated that about 100 truck loads went to the landfill.
- Aluminum siding was then removed and taken to a recycler.
- The steel beams were dismantled and taken to Ottumwa for future use by SIIM.

The workers indicated that the foil-backed pieces generally remained intact during removal, and that they did not notice a sticky substance on the insulation. Velda worked at the site for about two months; Sandy for about three months. Both women indicated that they spent almost 100% of their time handling the insulation. They said that no dust suppression measures were taken during demolition. Near the end of the project, they had to stop work until a permit was issued. The demolition took place between mid August and mid November.

The workers indicated that they were allowed to take insulation home for personal use. However, only the top layer of insulation from the roof was used for this purpose; none of the foil-backed insulation was taken for personal use. Sandy had two large truck loads transported to her property and placed in a shed for storage. A small amount had been placed in her attic bedroom where her son sleeps. Kent Gunderson, a friend of Sandy's, hauled the insulation from Des Moines to Brooklyn. As payment, she allowed Mr. Gunderson to take some insulation for his personal use.

At some point, Sandy was contacted by Gazi George and told that the insulation needed to be removed from her home and someone would be coming to get it. A semi truck lined with black plastic came from Illinois and trucks marked "Hydroclean" came from Des Moines to conduct the removal. Workers wore respirators, tyvek suits, and gloves (level C). They indicated to Sandy that there were PCBs in the insulation and they provided to her copies of lab reports showing low levels of PCBs. Sandy took photos of the removal and provided copies to me. The photos are included as attachment 3 to this report.

After learning of the PCBs in the insulation, Velda contacted the IDPH and sent to them the lab report provided by the removal company. Velda and Sandy are concerned about exposures to PCBs during the demolition project. When asked about any health problems since the demolition work, the women indicated that they did not develop a skin rash, but did experience itching, probably due to handling fiberglass material. Both women experienced runny noses all throughout the demolition work, and Velda indicates that her voice is "raspier" than it used to be. The women indicated that they showered immediately after arriving home from working with the insulation, and that this helped alleviate the itching, but did not resolve it completely.

Both women are interested in having their blood tested for PCBs. Sue explained that all people have a certain blood PCB level due to various environmental exposures. A blood test can be done and the results will be compared to a national average. A result higher than the national average can not be linked back to the Dico project; a result lower than the national average may provide some comfort regarding exposures experienced during demolition work. Sue further explained that once PCBs are in the body, there is no way to get them out completely. All we can do is try to limit future exposures and also limit activities that are known to be hard on the liver (alcohol consumption and certain medications).

Sue indicated that she would look into how we can get the blood testing done. The women indicated that they know of others who have similar health concerns and may want to have their blood tested as well. Sue suggested that we might have an availability session inviting all the demolition workers once we find a way to get the testing done.

We left Velda's home at about 4:15 p.m. Sue had to return to Kansas City Monday evening. Todd Campbell and John Frey returned to Des Moines for an inspection scheduled for Tuesday morning. I traveled to Newton, Iowa for the night, planning on meeting with Jim Hughes on Tuesday morning.

Meeting with Jim Hughes, owner of SIM:

Jim Hughes, Owner
Southern Iowa Mechanical
3043 Pawnee Drive
Ottumwa, IA 52501
(641) 799-4392

At approximately 10:15 a.m. on Tuesday, April 22, 2008, I met with Jim Hughes at the McDonalds restaurant in Ottumwa, Iowa. Mr. Hughes indicated that he is an honest, church-going man and did not intend to cause any harm. He indicated that he was not told anything about the history of the buildings, but he was told not to damage the asphalt cap as it was covering up something. His main contact was Don Brown. No contact information was provided for Don Brown.

Mr. Hughes indicated that he had been speaking with Titan for the past year or so about taking down the buildings. He thought someone was interested in purchasing the property and that Titan was anxious to remove the buildings in order to make the property more attractive for a developer.

Concrete blocks, wood, and insulation went to the landfill. The transporter was Waste Management. Mr. Hughes had attempted to get records from Waste Management regarding the loads of insulation and other debris they hauled to the landfill, but the company said they could not provide all records, only a few. Mr. Hughes provided to me copies of a few invoices and tickets from Waste Management, which are included as attachment 4. Scrap steel and aluminum went to Alters, a recycling facility. Jim was not aware of anyone other than Sandy Beck who had taken insulation from the site.

Mr. Hughes said that he did not know he needed a permit to do the demolition. At a certain point in the project, someone from the city came by and said they needed a permit and that the sewer line had to be closed. Jim billed Titan for the work, but Titan came back and said that Jim had to pay for the sewer closure (approximately \$5,000-\$6,000).

Mr. Hughes took ownership of SIM in October 2004 and continued jobs for Titan and others. In general, SIM performs pipefitter work, millwright work (mechanical

installation), concrete and electrical work. SIM is not in the business of building demolition. SIM was interested in the Dico buildings because of the steel support beams that he could re-erect at another location. He paid Titan \$140,000 for the steel. He does not recall signing any contract or papers for this transaction. He did not know that there were two roofs when he agreed to do the work.

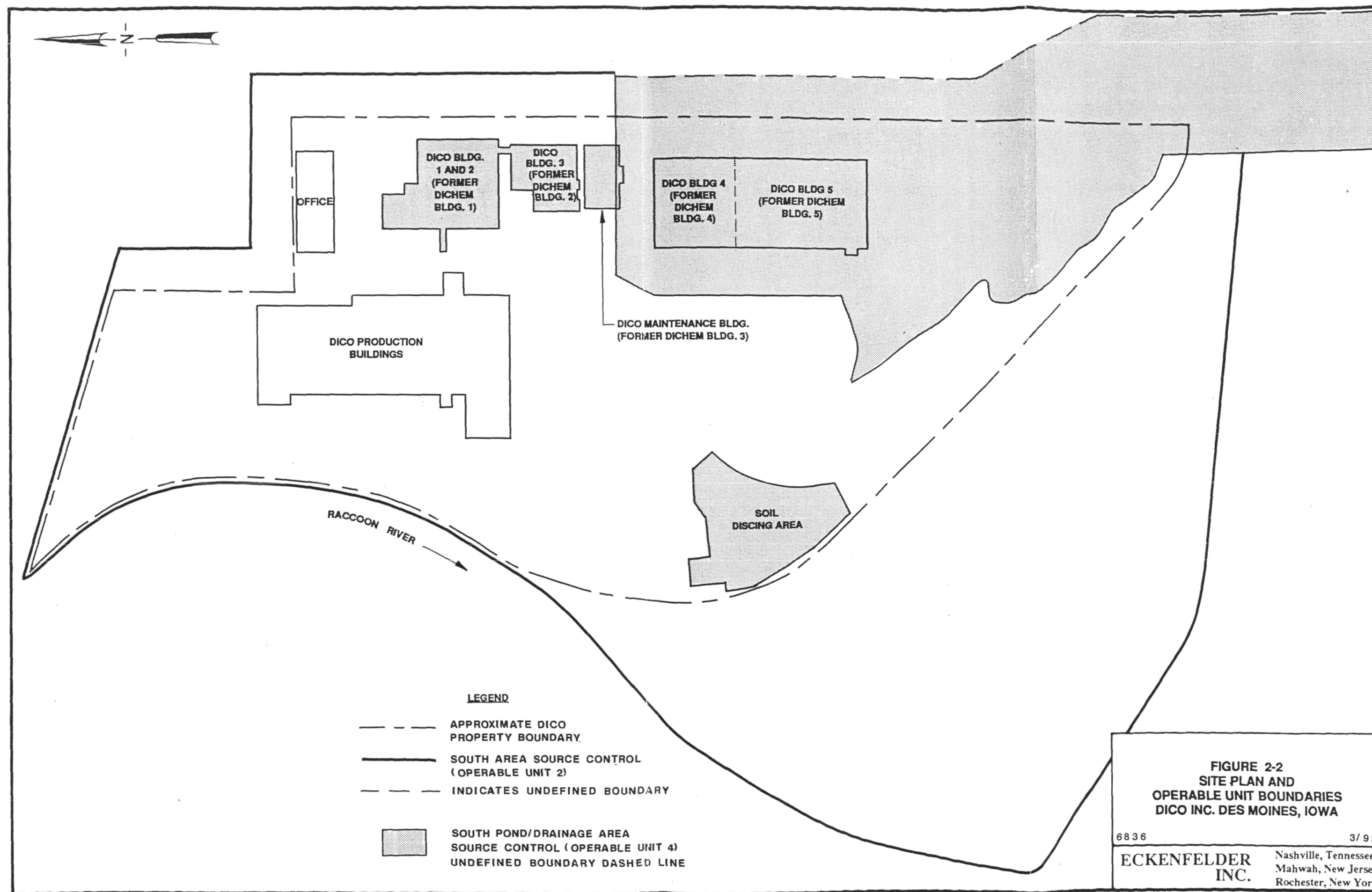
Mr. Hughes indicated that Doug Pospisil and Bill Campbell with Titan were involved in the building demolition project. According to Mr. Hughes, Bill Campbell is president of Titan Tire in Des Moines. Contact information for Doug Pospisil is provided below. Contact information for Bill Campbell is unknown.

Doug Pospisil
Manufacturing Services Manager
Titan Tire Corporation
2345 E. Market Street
Des Moines, IA 50317
(515) 265-9420

I informed Mr. Hughes that he would likely receive an information request letter from EPA, asking for documents related to the demolition project and the workers. I gave him my business card and told him to call me if he has questions or concerns about the letter. The meeting concluded at approximately 11:30 a.m. and I returned to Kansas City.

Attachments:

1. Dico site map showing location and names of buildings
2. Photos of concrete slabs remaining following demolition of buildings on Dico property
3. Photos provided by Sandy Beck regarding the removal of insulation from her property in Brooklyn, Iowa
4. Invoices and tickets from Waste Management provided by Jim Hughes
5. Information protected by Privacy Act



Attachment 2

Photos from 4-21-08 Dico site inspection



Maintenance Building slab; view from outside fence looking west



Building 5 slab; view from outside fence looking south



Building 4 slab; view from outside fence looking north



Building 4/5 slab; view from inside fence looking south

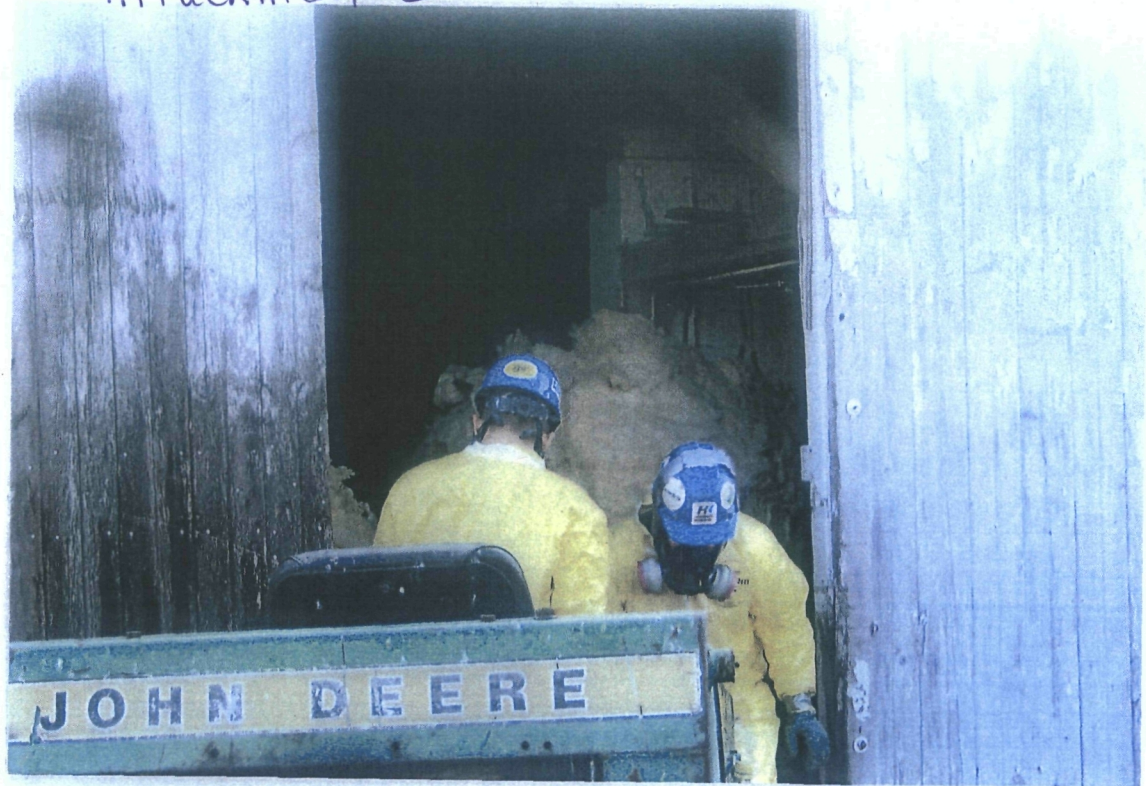


Maintenance Building slab; view from inside fence looking north



North end of Production Building; view from inside fence looking west

Attachment 3

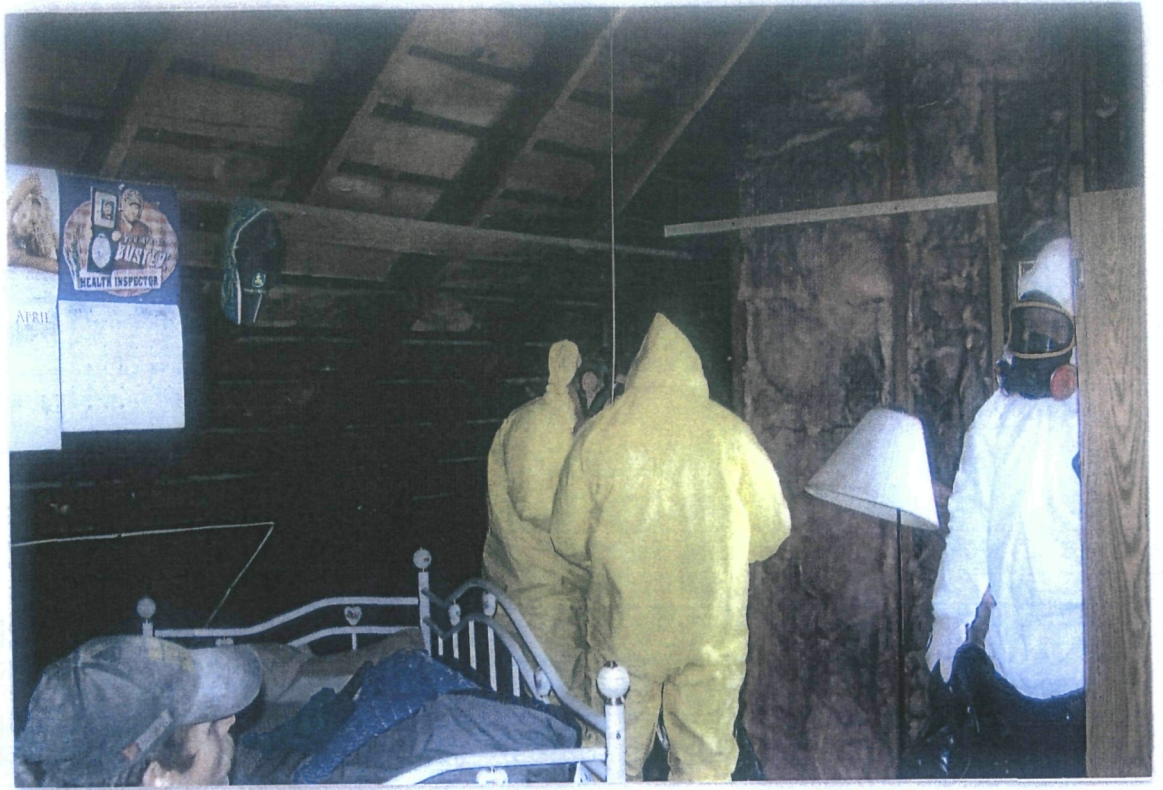








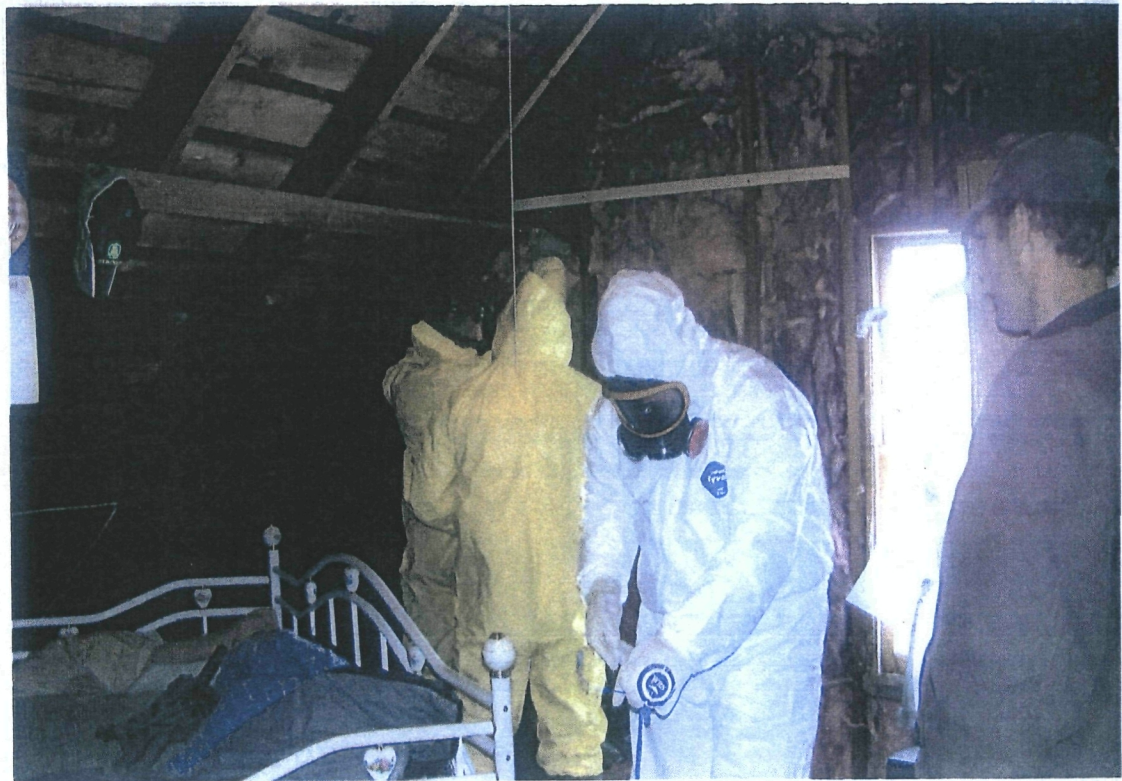












Attachment 4



Waste Management Customer Service Center
10050 Naples Street NE
Blaine, MN 55449
Ph (800) 777-8408 • Fax (763) 783-5477

Fax

To: Jim Hughes

From: Mona

Fax: 641-682-8314

Pages: 7

Phone:

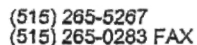
Date: 4/21/08

Re:

CC:

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

• **Comments:**



Page 1

Customer:	SOUTHERN IOWA MECHANICAL
Account Number:	494-0053294-0516-0
Invoice Date:	03/01/2008
Invoice Number:	0000000-0516-5
Due Date:	Due Upon Receipt
WM ezPay Account ID:	00007-25551-93006

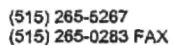
Current Invoice Amount	Total Amount Due
0.00	432.21

Description	Amount
Previous Balance	438.69
Total Credits and Adjustments	6.48
Total Payments Received	0.00
Total Current Charges	0.00
Total Amount Due	432.21
Total Amount Past Due	432.21
Service Period: FEB 2011	
Description	Amount
Roll-Off	0.00
Total Current Charges	0.00

Please be advised that in order to deliver the quality of service you expect, as well as to cover rising costs such as environmental compliance, insurance, CPI increases and to maintain a satisfactory margin, this bill may reflect a modest rate increase.

If full payment of the invoiced amount is not received within 30 days of the invoice date, you will be charged a monthly late fee of 1.5% of the unpaid amount, with a minimum monthly charge of \$3.00, or such lesser late fee allowed under applicable law, regulation or contract.

Current Due	Over 30	Over 60	Over 90	Over 120	Total Due
0.00	0.00	0.00	432.21	0.00	432.21



Please detach and enclose this portion with your payment - do not send cash.

Due Date	Total Due	Amount Paid
Upon Receipt	432.21	

Waste Management introduces WM ezPay!!
Pay your WM bill on-line at www.wm.com.
To pay your invoice by phone, call 866-WMI-2PAY or 866-964-2729.

Learn how we Think Green at
www.wm.com/thinkgreen

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JD516061

SOUTHERN IOWA MECHANICAL
3043 PAWNEE DR
OTTUMWA IA 52501-5902

Please make **WASTE MANAGEMENT OF IOWA**
Check **PO BOX 9001054**
Payable To: **LOUISVILLE KY 40290-1054**

*From everyday collection to environmental protection,
Think Green. Think Waste Management.*

FOR CHANGE OF ADDRESS OR ANY SERVICE ISSUES CONTACT NUMBER ABOVE



NOTICE By sending your check, you are authorizing Waste Management to use information on your check to make a one-time electronic debit to your account at the financial institution indicated on your check. This electronic debit will be for the amount of your check and may occur as soon as the same day we receive your check. If you have questions regarding this check conversion process only, please call 866-701-0454. For any other unrelated issues, please contact the phone number listed on the front of your invoice.

Please send all bankruptcy correspondence to 2421 W. Peoria Ste 210 Phoenix AZ 85029.
(This language is in compliance with 11 USC 342(c)(2) of the bankruptcy Code)



WASTE MANAGEMENT OF IOWA
PO BOX 756
DES MOINES IA 50303-0756

INVOICE

Page 3

Customer: SOUTHERN IOWA MECHANICAL
Account Number: 494-0053294-0516-0
Invoice Date: 03/01/2008
Invoice Number: 0000000-0516-5
Due Date: Due Upon Receipt
WM ezPay Account ID: 00007-25551-93006

Service Location: 494-53294 SOUTHERN IOWA MECHANICAL 200 SW 16TH ST DES MOINES IA 50309

Date	Ticket	Description	Quantity	U/M	Rate	Amount
Total Current Charges						0.00

Credit and Adjustments Detail

02/27/2008		REVERSE LATE PAYMENT FEE				6.48-
Total Credits and Adjustments						6.48-

9:41 AM Roll Off Dispatch Closed Ticket Display 4/21/2008
Opened by RHARDING

494-53294 SOUTHERN IOWA MECHANICAL

200 SW 16TH ST DES MOINES IA 50309

Ticket 463209 Driver code DRDIL Requested by CUSTOMER-ADAM

Dump Info: Site DMC Tkt# 232933 Tons 5.47 Tax .00 Cost 178.87

Load type DNR Equipment code 494 - 451 Points 85

Status Code * Additional comments exist for this ticket *

	Date	Time		Time
Dispatched:	11/28/2007	14:45	Arrived at customer:	15:15
Loaded / Drop off:		15:30	Stop Ticket:	
Restart Ticket:			Arrived at landfill:	16:00
Finished at landfill:		16:10	Ticket completed:	16:10

Svc	Quantity	Price	Special Description	Job #	Tax T/P
DTE	5.47	39.00	CORELL REC		T
300	1.00	190.00	FINAL		T

Bottom

F3=Exit F12=Previous F13=Additional Comments F17=Top F18=Bottom

9:41 AM Roll Off Dispatch Closed Ticket Display 4/21/2008
Opened by RHARDING

494-53294 SOUTHERN IOWA MECHANICAL

200 SW 16TH ST DES MOINES IA 50309

Ticket 463207 Driver code DRDIL Requested by CUSTOMER-ADAM

Dump Info: Site TAY Tkt# 057728 Tons 11.62 Tax .00 Cost 395.08

Load type DNR Equipment code 494 - 451 Points 56

Status Code * Additional comments exist for this ticket *

	Date	Time		Time
Dispatched:	11/28/2007	12:37	Arrived at customer:	12:49
Loaded / Drop off:		12:54	Stop Ticket:	
Restart Ticket:			Arrived at landfill:	13:04
Finished at landfill:		13:11	Ticket completed:	13:11

Svc	Quantity	Price	Special Description	Job #	Tax T/P
DTE	11.62	39.00	CORELL REC		T
300	1.00	190.00	FINAL		T

F3=Exit F12=Previous F13=Additional Comments F17=Top F18=Bottom

Bottom

9:44 AM Customer Payment Inquiry 4/21/2008
 Customer: 494-53294
 SOUTHERN IOWA MECHANICAL 200 SW 16TH ST

	Current	3/31/2008	2/29/2008	1/31/2008	12/31/2007	Total Due	
	.00	.00	.00	.00	.00	.00	
Item #	Date	Misc	Type	Code	Debit	Credit	Balance
1806747	02/01/08	FIN CHRG	Fin.Chrg.	FIN	68.48		4633.58
1787842	02/04/08	6757	Payment	SLB		4132.89	500.69
1806747	02/19/08	FIN	Adjustmnt	RFC		68.48	432.21
1812097	02/27/08	FIN	Adjustmnt	RFC		6.48	425.73
1812097	03/01/08	FIN CHRG	Fin.Chrg.	FIN	6.48		432.21
1793189	03/11/08	OTP-ACH	Payment	SLB		432.21	.00
			Total				.00

F1=Switch Modes F3=Exit F5=Refresh F12=Previous F13=Start At Date
 F18=Bottom Print=Print Detail