



K - PLUS ENGINEERING, LLC

January 7, 2013

Ms. Jo Gayle Simmons, P.E.
Waste Management
1001 Fannin, Suite 4000
Houston, Texas 77002

Re: Phase I Environmental Site Assessment Review
Greenstar Recycling – Des Moines
2742 E Market Street,
Des Moines, Polk County, IA
K-Plus Project No. 22132A

Dear Ms. Simmons

K-Plus Engineering LLC has completed a review of the November 16, 2012 Environmental Site Assessment prepared by TGE Resources, Inc for the Greenstar Recycling facility located in Des Moines, Iowa. In addition to our review of existing prior reports, K-Plus completed a site reconnaissance on December 5, 2012, interviewed key site contacts and reviewed Freedom of Information (FOIA) documents provided by the City of Des Moines City Clerk. Additionally, K-Plus completed a preliminary compliance review for the subject property.

ESA Review and Site Conditions

K-Plus completed a site reconnaissance on December 5, 2012 meeting with the Facility General Manager, Mr. Kelley McReynolds. Mr. McReynolds provided access to all requested areas of the facility with the exception of the roof as there was no easy access available. In general, the site reconnaissance did not identify site features not discussed in the TGE report.

Based on review of historical resources, TGE identified that the subject property was vacant and/or agricultural land until development of a railroad spur along the northern Site limits in the early 1950s. The subject property was developed with Building 2 in the early 1960s and occupied by a railroad trans-loading facility until the mid-1990s. Since at least the mid-1990s, Building 1 has been constructed on the property; and in 1996 the subject property has been primarily operated by various recycling facilities. The Site is currently owned and occupied by Greenstar Recycling – Des Moines, a glass, aluminum, paper, plastic and cardboard recycling facility. In addition, the central portion of the subject building is leased to Crinc, a glass and aluminum recycling facility.

The TGE report identified the following concerns:

- TGE noted that a portion of the Site operated as a railroad trans-loading facility for at least 30 years. In the absence of determining information pertaining to possible historical use of petroleum-based products and/or hazardous materials (and other regulated materials), including that such use may have resulted in a “past release” to the subject property, TGE identified this historical use as a REC in connection with the Site.
- TGE stated that the Site address, under the name Rock Island Motor Garage, formerly operated with at least one diesel UST. Neither the installation date, former location, nor capacity was reported, but it was noted that the tank was associated with a release incident in June 1990. Although information regarding UST removal and/or soil or groundwater sampling/characterization (if any) was not provided to TGE, the Site received closure from the State in January 1998 for the release incident. Therefore, TGE concluded that the listing of the Site as a UST/LUST facility represents a HREC in connection with the subject property.
- The adjacent property to the north was identified as a REC because of its long history in the area since at least the 1930s, its position upgradient from the subject property, and the potential for release of hazardous materials and/or petroleum products.
- The subject property and surrounding properties were previously utilized for agricultural purposes, and legal application of pesticides would have been expected during this time period. TGE noted that such use/application is not anticipated to present material risk to human health or the environment, and therefore, concluded that the former agricultural and pesticide use was considered a *de minimis* condition and did not represent a REC in connection with the subject property.
- TGE identified the neighboring property to the west, Chicago and North Western, as a HREC. This adjacent site formerly contained an 8,000-gallon gasoline UST that was reportedly removed from the ground in November 1987. Following a soil sampling event conducted within the tank pit area (backfill soils), elevated total petroleum hydrocarbon (TPH) was reported, indicating that a release had occurred. However, concentrations reported did not exceed Iowa Department of Natural Resources (IDNR) action guidelines in use at that time. This facility received closure from the State for this UST in August 1988. Based on final State closure with respect to this UST facility, TGE identified this adjoining property west as a HREC in connection with the Site.

Compliance Review

K-Plus completed a preliminary compliance review for the subject property. The facility is subject to several environmental permits or reporting.

K-Plus was provided with an air permit - conditional operating permit Type 2 for the facility – permit number 00459. The permit was issued by Polk County Air Quality Division for the property as operating under the name Greenstar in December 2011. The permit acknowledged the site’s primary activities as “recycling paper, glass and plastic products” and secondary activities as “glass grinding”. No specific emission limits or equipment listing was included in the permit, and at the time of our visit the facility appeared to be in compliance with Polk County. According to a compliance audit within a Phase I report performed for the property by Gannet Fleming, Inc. (GFI) in 2007, employees at the time indicated that shop fans are equipped with particulate filters to capture dust from site operations. The GFI report also indicated that used oil burned in shop heaters is acceptable if there is documentation that it meets federal used oil management standards 40 CFR 279.11. Based on our observations, emissions at the site do not appear to meet the yearly totals which would require an operating permit from the State of Iowa.

K-Plus was provided with a copy of the National Pollutant Discharge Elimination System (NPDES) Permit (Permit Discharge Authorization Number # 0335-0230, effective October 1, 1992) for the Site. The permit was issued by the Iowa Department of Natural Resources for “Storm Water Discharge Associated with Industrial Activity” and is set to provide coverage to Greenstar Recycling through September 2014. In association with the NPDES, a Storm Water Pollution Prevention Plan (SWPPP) was created for the site in 2010. It is recommended that the SWPPP be followed, including all training, testing, and best management practices outlined in the report.

During the inspection K-Plus noted four above ground storage tanks (ASTs) at the site – two fuel tanks measuring approximately 250 gallons in Building 1 and two diesel fuel tanks measuring approximately 500 gallons in Building 2. One of each size was noted to be used by Crinc. K-Plus was provided with a temporary permit from the City of Des Moines Department of Fire Prevention for the storage of combustible fiber, storage of flammable/combustible liquids, and materials used for repair. According to the permit, the site was inspected on August 21, 2012 and found to be in “substantial compliance with the adopted codes and ordinances of the City of Des Moines.” The permit is valid until August 15, 2013. No other storage tank registration appears to be required for the site. Used oil was observed in secondary containment within the southern maintenance area of Building 1. According to property management, used oil from site operations is recycled on-site as fuel for Site space heaters.

Based on the amount of oil stored in containers such as ASTs and 55-gallon drums (above 1,320 gallons), the facility should maintain a Spill Prevention, Control and Countermeasure (SPCC) Plan. No SPCC Plan was available for review during the K-Plus visit.

K-Plus did not observe waste disposal practices that would qualify the site as a RCRA generator of hazardous waste, nor did the 2007 GFI compliance audit.

According to site contacts and K-Plus research, the site does not require a solid waste permit.

K-Plus reviewed an AuditCheck Facility Report provided by Environmental Data Resources (EDR). The AuditCheck report had two records for Greenstar at the subject property address, both related to air emission compliance. Indications are that the State conducted on-site inspections, and the site is listed both as "In Compliance" and in a default classification that actual or potential emissions are above applicable major source thresholds. As noted above, a Polk County air permit is up-to-date for the facility, and annual emissions do not appear great enough to qualify for a requirement for a State Operating permit.

The EDR Radius Report (dated October 16, 2012; and found in the TGE, Inc. Phase I ESA of the Property dated November 16, 2012) searched the Emergency Response Notification System (ERNS) database and found no record of incidents involving the Property.

K-Plus was anticipating a review of a Zoning Compliance Report (ZCR) for the site conducted by Millman Zoning; however, as of the date of this report no ZCR had been provided.

K-Plus reviewed records from the City of Des Moines building and zoning departments for any notices or violations related to local regulations. No records regarding non-compliance concerns were noted on file during our investigation. A certificate of occupancy notice was noted at the building department and identified Greenstar Recycling as the current occupant.

During the inspection, K-Plus noted empty plastic totes discarded on the property. Mr. McReynolds did not know what the totes used to contain but stated that they had been on site for a long time. K-Plus did not observe any evidence of odor associated with the containers.

One scale was noted at the facility, south of the main building. Mr. McReynolds indicated that the scale was in good condition; however, no inspection certification was provided to K-Plus.

Wetlands are located just to the southeast of the Subject Property, and may encroach onto the site. According to the USFWS National Wetland Inventory map, the wetlands were identified as Freshwater Forested/Shrub. See Attachment 2 for the USFWS National Wetland Inventory map.

The 1996 construction date of the Properties Building 1 improvements mitigates asbestos concerns. Most ACM were banned from manufacture or were discontinued due to federal regulations passed between 1973 and 1978. However, asbestos-containing building materials (ACBM) (such as vinyl floor finishes, wall/ceiling finishes and thermal insulation materials) may exist at the Property based on the 1960 construction date for Building 2. Visual observation of suspect surfaces by K-Plus did not locate damaged/friable conditions; surfaces were observed to be in generally good condition. Thus, K-Plus recommends that any suspect ACBM should be managed as if it contains asbestos, and if it is removed that it be done so by a licensed, asbestos contractor.

Lead-based paint (LBP) does not represent a significant risk on the Property. No long-term or permanent residential use is made of the Property improvements. Painted surfaces were observed to be in good condition with no significant areas of peeling or chipping.

No concerns regarding mold or persistent water infiltration were reported or observed at the Property. No air quality issues or concerns were reported by Property management.

Buildings at the Property are well-ventilated and did not contain any basements. Therefore, radon did not appear to be a concern for the property and no radon samples were collected.

Summary

Because the TGE report is already on file with Waste Management, it is not attached to this review letter. Any documents provided by facility personnel and through local FOIA request that were relied upon in this letter are included in Attachment 2. K-Plus concurs with identification of 2 RECs, one HREC, and one de minimis condition. K-Plus disagrees with the identification of one REC.

Specifically, K-Plus agrees that the historic use of the site as a railroad trans-loading facility and the adjacent railyard to the north are both considered RECs due to the potential release and migration of contaminants. K-Plus agrees that the adjacent Chicago and North Western property to the west is a HREC for the site and no longer an active environmental concern. K-Plus agrees that the historic, likely use of pesticides on the site is considered a de minimis condition.

K-Plus disagrees with the identification of Rock Island Motor Garage as a REC. According to the historical records researched by TGE, Rock Island Motor Garage was formerly located at the site; however, K-Plus notes that the address given for the UST/LUST incident is 2700 Market Street. K-Plus disagrees with TGE's statement that the site address itself is listed as a UST/LUST site. Based on the listed distance of the UST/LUST incident from the Subject Property, K-Plus does not consider this a REC.

Finally, K-Plus recommends general grounds exterior maintenance where housekeeping needs improvement to prevent and minimize off-site impacts via normal storm water and heavy wind conditions. Scattered plastic, paper and glass scraps and wastes were observed on the northern and eastern portions of the property. These materials, scrap metal, general trash, and other refuse were also evident in the wooded area and in and around the water-filled storm water ditch that exits on the east end of the property.

This evaluation has been performed in conformance with all applicable legal requirements and accepted practices prevailing in the environmental engineering and consulting industries. The personnel who performed the investigation are properly licensed and certified in accordance with the requirements of any federal, state, and local laws, rules and regulations. K-Plus Engineering, its officers, and its employees have no present or contemplated interest in the property or the parties involved. Our employment and compensation for preparing this report are not contingent upon any action or event resulting from the analyses, opinions, observations, or conclusions, in or from the use of, this report. The reported opinions and conclusions are unbiased, professional, and limited only by the reported assumptions, qualifications, and conditions stated herein.

If you have any questions regarding this evaluation please feel free to contact us at your convenience.

Sincerely,
K-PLUS ENGINEERING LLC



Kashif Bazal
Project Scientist



Daniel M. Caplice, P.E.
Principal Engineer

ATTACHMENT 1
PHOTOGRAPHS

PHOTOGRAPHS



Photograph No. 1

Main entrance access to the Property is via driveway located along the side of the East Market Street



Photograph No. 2

Trailer lift and initial hopper and conveyor system

PHOTOGRAPHS



Photograph No. 3
Above ground storage tank



Photograph No. 4
Offices common area in Building 2

PHOTOGRAPHS



Photograph No. 5
View of facility from the southeast



Photograph No. 6
Interior view Building 2

PHOTOGRAPHS



Photograph No. 7
Interior view Building 1



Photograph No. 8
Railroad trans-loading facility north of the Property.

PHOTOGRAPHS



Photograph No. 9

Scattered plastic, paper and glass scraps and wastes were observed on the northern and eastern portions of the property



Photograph No. 10

Materials, scrap metal, general trash, and other refuse were also evident in the wooded area of the Property.

PHOTOGRAPHS



Photograph No. 11
Storage of products at east of the Property



Photograph No. 12
East view of the Property

PHOTOGRAPHS



Photograph No. 13
Typical trailer parking areas west of Building 2



Photograph No. 14
Residential development south of the Property.

ATTACHMENT 2
LOCAL RECORDS

2012

POLK COUNTY - AIR QUALITY DIVISION
CONDITIONAL OPERATING PERMIT - TYPE 2
PERMIT NUMBER 00459

PERMIT HOLDER

Company Name: Greenstar

Facility Contact: Letha Larson
515-265-1208

Facility Address: 2742 E Market St.
Des Moines, Iowa 50317

Responsible Official: Kelley McReynolds

Mailing Address: Same

SOURCE

Principle Activity: Recycling paper, glass and plastic products.

Secondary Activities: Glass grinding.

This permit is granted in accord with Chapter V Article X Polk County Board of Health Rules and Regulations. This permit is issued subject to the conditions which follow.

Brent Blanchard

For the Air Quality Division

December 6, 2011
Date

E. Permit Openings

The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Revisions must be made to this permit to incorporate applicable standards and regulations adopted and shall be treated as a permit renewal.

The permit may be reopened or revised if the department makes a determination that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

The permit may be reopened or revised if the department determines that the permit must be revised or revoked to assure compliance by the source with the applicable requirements.

Other conditions may be specified for each particular facility.

F. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
 3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 4. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.
-

G. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control other than the potential of that equipment for reducing air contaminant emissions.

H. Severability

The provisions of this permit are severable and if any circumstance is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding.

INVOICE /Permit #

City of Des Moines
Bureau of Fire Prevention
Temporary Permit

SEP 24 RECD Occupancy No.

T- 52605

28038

Under Fire Prevention Code this certifies a Temporary Permit is issued to:

Business Name Greenstar Phone # 265 1208

Address issued the permit 2742 E Market Zip Code 50317

Contact & mailing address if different than above _____

Permits	Fee
(A-CMBFBR) Store combustible fibers >100 ft. cu.	\$ 45 ⁰⁰
(A-FLMCMB) Store flammable/combustible liquids	45 ⁰⁰
(A-GARAGE) Use for repair	45 ⁰⁰
Total Fees	\$135 ⁰⁰

If this permit is for Pyrotechnics or Fireworks, permittee agrees to comply with the insurance and indemnification requirements specified in Attachment 1 of the Application for this Permit.

Inspector [Signature] Inspection Date 8-21-12 Expiration Date 8-15-13

Received by [Signature] Print Name Letha Larson

9-19-12 Paid on ✓ # 188439

Your location for a temporary permit(s) was inspected on the above listed date and was found to be in substantial compliance with the adopted codes and ordinances of the City of Des Moines. This temporary permit will be **VALID** until the expiration date listed above.

The fees, in whole, must be received by the Des Moines Fire Department prior to the event. Once payment is made, the temporary permit will be released to the business. If payment is not received, the permit is revoked and the business/vendor is subject to double fees up to \$200 per item and/or legal action.

Payment may be made in person at the Fire Prevention Bureau at 900 Mulberry, to the Inspector at the time of inspection (no cash) or mailed to:

Des Moines Fire Department
Attn: Fire Prevention Bureau
900 Mulberry Street
Des Moines, IA 50309

If you have any questions, please contact the Fire Prevention Bureau at 515-283-4240.



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
ROGER L. LANDE, DIRECTOR

DEPARTMENT OF NATURAL RESOURCES
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
NOTICE OF GENERAL PERMIT COVERAGE UNDER
GENERAL PERMIT NO. 1

STORM WATER DISCHARGE ASSOCIATED WITH INDUSTRIAL ACTIVITY

This notice of general permit coverage for a storm water discharge associated with industrial activity is issued pursuant to the authority of section 402 (b) of the Clean Water Act (U.S.C. 1342(b)), Iowa Code 455B.174, and subrule 567--64.4(2), Iowa Administrative Code. A Notice of Intent has been filed with the Iowa Department of Natural Resources that this storm water discharge complies with the terms and conditions of NPDES General Permit No. 1. Authorization is hereby issued to discharge storm water associated with industrial activity as defined in Part VIII of the Iowa Department of Natural Resources NPDES General Permit No. 1 in accordance with the terms and conditions set forth in the permit.

**Owner: GREENSTAR NORTH AMERICA
ATTN: DEBBIE HART
3411 RICHMOND, SUITE 700
HOUSTON TX 77046
(713)965-0005**

Permit Coverage Issued To:

**GREENSTAR RECYCLING
2742 E. MARKET ST.
in DES MOINES, POLK COUNTY
located at**

1/4 Section	Section	Township	Range
SE	1	78N	24W

Coverage Provided Through: 9/30/2014

Standard Industrial Classification Code: 5093

NPDES Permit Discharge Authorization Number: 0335 - 0230

Discharge Authorization Date: 10/1/1992



U.S. Fish and Wildlife Service National Wetlands Inventory

2742 E. Market,
Des Moines, IA

Jan 7, 2013



Wetlands

- Freshwater Emergent
- Freshwater Forested/Shrub
- Estuarine and Marine Deepwater
- Estuarine and Marine
- Freshwater Pond
- Lake
- Riverine
- Other

Status

- Digital
- Scan
- Non-Digital
- No Data

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

User Remarks:

ATTACHMENT 3
EDR AUDITCHECK FACILITY REPORT

GREEN STAR RECYCLING

2742 East Market Street
Des Moines, IA 50317

Inquiry Number: 03467978.1r
December 3, 2012

EDR-AuditCheck™ Facility Report

TABLE OF CONTENTS

The EDR-AuditCheck[®] Facility Report is a comprehensive presentation of government filings on a facility identified in a search of over 4 million government records from more than 600 federal, state and local environmental databases. The report is divided into three sections:

Section 1: Facility Summary Page 3

Summary of facility filings including a review of the following areas: air emissions, water discharges, waste management, waste disposal, multi-media issues, and health & safety issues. Due to inconsistent name and/or locational information, records on the same facility may be listed in separate facility columns.

Section 2: Facility Detail Reports Page 4

All available detailed information from databases where sites are identified.

Section 3: Databases Searched and Update Information. Page 8

Name, source, update dates, contact phone number and description of each of the databases searched for this report.

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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SECTION 1: FACILITY SUMMARY

Due to inconsistent name and/or locational information, records on the same facility may be listed in separate facility columns.

	RECORD 1 GREENSTAR 2742 E MARKET ST DES MOINES, IA 50317 EDR ID #1011936085 EPA #110037594966	RECORD 2 GREENSTAR 2742 E MARKET ST DES MOINES, IA EDR ID #-719153459	TOTAL (YES)
AIR EMISSIONS			
Permitted air emissions (AIRS)	NO	YES - p7	1
Reported emergency releases to air (ERNS/A)	NO	NO	0
Compliance data (AIRS/COM)	NO	YES - p7	1
WATER DISCHARGES			
Permitted waste water discharges (NPDES/PCS)	NO	NO	0
Reported emergency releases to water (ERNS/W)	NO	NO	0
Enforcement actions (NPDES/PCS-ENF)	NO	NO	0
Inactive waste water discharges (NPDES-PCS INACT)	NO	NO	0
Stormwater permit (STORMWATER)	NO	NO	0
WASTE MANAGEMENT			
Generates hazardous waste (RCRA)	NO	NO	0
Treats, stores, or disposes of hazardous waste on-site (RCRA/TSDF)	NO	NO	0
Received Notices of Violations (RCRA/VIOL)	NO	NO	0
Subject to RCRA administrative actions (RAATS)	NO	NO	0
Subject to corrective actions (CORRACTS)	NO	NO	0
Handles PCBs (PADS)	NO	NO	0
Uses radioactive materials (MLTS)	NO	NO	0
Manages registered aboveground storage tanks(AST)	NO	NO	0
Manages registered underground storage tanks(UST)	NO	NO	0
Leaking underground storage tank incidents (LUST)	NO	NO	0
Emergency releases to the soil (ERNS)	NO	NO	0
Hazardous material incidents to DOT (HMIRS)	NO	NO	0
WASTE DISPOSAL			
Superfund Site (NPL)	NO	NO	0
Record of Decision (ROD)	NO	NO	0
A known or suspect abandoned, inactive or uncontrolled hazardous waste site (CERCLIS)	NO	NO	0
Superfund Lien (LIENS)	NO	NO	0
State hazardous waste site (SHWS)	NO	NO	0
Disposed of solid waste on-site (SWF/LF)	NO	NO	0
MULTIMEDIA			
Uses toxic chemicals and has notified EPA under SARA Title III, Section 313 (TRIS)	NO	NO	0
Produces pesticides and has notified EPA under Section 7 of FIFRA (SSTS)	NO	NO	0
Manufactures or imports toxic chemicals on the TSCA list (TSCA)	NO	NO	0
Inspections under FIFRA, TSCA or EPCRA (FTTS)	NO	NO	0
Risk Management Plans database (RMP)	NO	NO	0
Listed in EPA's index system (FINDS)	YES - p5	NO	1
Listed in a county/local unique database (LOCAL)	NO	NO	0
HEALTH AND SAFETY			
Inspected by the Occupational Safety and Health Administration (OSHA)	NO	NO	0
Violations under OSHA (OSHA/VIOL)	NO	NO	0
Facility has had accidents according to the Occupational Safety and Health Administration (OSHA/ACC)	NO	NO	0
TOTAL (YES)	1	2	3

- A "NO" indicates that no findings were identified based on an exact name, address and/or EPA facility identification number search. Facility information may be available under an alternate name, address and/or EPA identification number.

SECTION 2: FACILITY DETAIL REPORTS

Record 1: GREENSTAR
DES MOINES, IA 50317 (EDR ID# 1011936085)

AIR EMISSIONS

Facility has permitted air emissions NO
Facility has reported emergency releases to air NO
Facility has compliance data NO

WATER DISCHARGES

Facility has permitted waste water discharges. NO
Facility has reported emergency releases to water. NO
Facility has enforcement actions NO
Facility has an inactive waste water permit. NO
Facility has stormwater discharges NO

WASTE MANAGEMENT

Facility generates hazardous waste NO
Facility treats, stores, or disposes of hazardous waste on-site. NO
Facility has received Notices of Violations NO
Facility has been subject to RCRA administrative actions NO
Facility has been subject to corrective actions. NO
Facility handles PCBs. NO
Facility uses radioactive materials. NO
Facility manages registered aboveground storage tank incidents. NO
Facility manages registered underground storage tank incidents. NO
Facility has reported leaking underground storage tank incidents NO
Facility has reported emergency releases on land NO
Facility has reported hazardous material incidents to DOT. NO

WASTE DISPOSAL

Facility is a Superfund site NO
Facility has a Record of Decision on it. NO
Facility has a known or suspect abandoned, inactive, or uncontrolled hazardous waste site NO
Facility has a reported Superfund Lien on it. NO
Facility is listed as a state hazardous waste site. NO
Facility has disposed of solid waste on site NO

MULTI-MEDIA

Facility uses toxic chemicals and has notified EPA under SARA Title III, Section 313. NO
Facility produces pesticides and has notified EPA under Section 7 of FIFRA NO
Facility manufactures or imports toxic chemicals on the TSCA list. NO
Facility has inspections under FIFRA, TSCA or EPCRA NO
Facility is listed in EPA's index system. YES
Facility is in the Risk Management Plans database. NO
Facility is listed in a county/local unique database. NO

HEALTH AND SAFETY

Facility has been inspected by the Occupational Safety and Health Administration NO
Facility has violations cited by the Occupational Safety and Health Administration. NO
Facility has had accidents according to the Occupational Safety and Health Administration. NO

TOTALS (YES) 1

SECTION 2: FACILITY DETAIL REPORTS

...Continued...

MULTIMEDIA

Facility is listed in EPA's index system

DATABASE: Facility Index System (FINDS)

GREENSTAR
2742 E MARKET ST
DES MOINES, IA 50317
EDR ID #1011936085

This site is listed in the Federal FINDS database. The FINDS database may contain references to records from government databases included elsewhere in the report.

Please note: the FINDS database may also contain references to out of date records formerly associated with the site.

Registry ID: 110037594966
Facility Name: GREENSTAR
Facility Address: 2742 E MARKET ST
DES MOINES, IA 50317
Facility County: POLK
Facility URL: http://iaspub.epa.gov/enviro/fii_query_detail.disp_program_facility?p_registry_id=110037594966
FIPS: 19153
Fed Facility: Not reported
Fed Agency: Not reported
Tribal Land: Not reported
Tribal Name: Not reported
Congressional District: 03
Hydrologic Unit Code: 07100008
EPA Region: 07
Site Type: STATIONARY
Date Created: 06-JAN-09
Date Updated: 20-APR-10
U.S-Mexico Border: Not reported
Latitude: 41.586937
Longitude: -93.564068
Conveyor: FRS
Horizontal Collection: ADDRESS MATCHING-HOUSE NUMBER
Horizontal Accuracy: 30
Reference Point: ENTRANCE POINT OF A FACILITY OR STATION
Horizontal Datum: NAD83
Coordinates Source: Not reported
Environmental Interest/Information System

AFS (Aerometric Information Retrieval System (AIRS) Facility Subsystem) replaces the former Compliance Data System (CDS), the National Emission Data System (NEDS), and the Storage and Retrieval of Aerometric Data (SAROAD). AIRS is the national repository for information concerning airborne pollution in the United States. AFS is used to track emissions and compliance data from industrial plants. AFS data are utilized by states to prepare State Implementation Plans to comply with regulatory programs and by EPA as an input for the estimation of total national emissions. AFS is undergoing a major redesign to support facility operating permits required under Title V of the Clean Air Act.

Program System ID: 1915300459
Program Sys. Name: AIRS/AFS
Env. Interest Type: AIR MAJOR
Env. Interest Start Dt.: Not reported
Start Date Qualifier: Not reported
Env. Interest End Dt.: Not reported
End Date Qualifier: Not reported
Data Source: AIRS/AFS
Active Code: Yes

Alternative Name: MIDAMERICAN RECYCLING

Contact Name: KELLEY MC REYNOLDS
Contact Type: COMPLIANCE CONTACT
Contact Title: Not reported
Contact Telephone: (515) 265-1208
Contact Fax: Not reported
Contact email: Not reported
Contact Address: Not reported

SIC Code: 5093(SCRAP AND WASTE MATERIALS)

SECTION 2: FACILITY DETAIL REPORTS

...Continued...

Record 2: GREENSTAR
DES MOINES, IA (EDR ID# I-719153459)

AIR EMISSIONS

Facility has permitted air emissions YES
Facility has reported emergency releases to air NO
Facility has compliance data YES

WATER DISCHARGES

Facility has permitted waste water discharges. NO
Facility has reported emergency releases to water. NO
Facility has enforcement actions NO
Facility has an inactive waste water permit. NO
Facility has stormwater discharges NO

WASTE MANAGEMENT

Facility generates hazardous waste NO
Facility treats, stores, or disposes of hazardous waste on-site. NO
Facility has received Notices of Violations NO
Facility has been subject to RCRA administrative actions NO
Facility has been subject to corrective actions. NO
Facility handles PCBs. NO
Facility uses radioactive materials. NO
Facility manages registered aboveground storage tank incidents. NO
Facility manages registered underground storage tank incidents. NO
Facility has reported leaking underground storage tank incidents NO
Facility has reported emergency releases on land NO
Facility has reported hazardous material incidents to DOT. NO

WASTE DISPOSAL

Facility is a Superfund site NO
Facility has a Record of Decision on it. NO
Facility has a known or suspect abandoned, inactive, or uncontrolled hazardous waste site NO
Facility has a reported Superfund Lien on it. NO
Facility is listed as a state hazardous waste site. NO
Facility has disposed of solid waste on site NO

MULTI-MEDIA

Facility uses toxic chemicals and has notified EPA under SARA Title III, Section 313. NO
Facility produces pesticides and has notified EPA under Section 7 of FIFRA NO
Facility manufactures or imports toxic chemicals on the TSCA list. NO
Facility has inspections under FIFRA, TSCA or EPCRA NO
Facility is listed in EPA's index system. NO
Facility is in the Risk Management Plans database. NO
Facility is listed in a county/local unique database. NO

HEALTH AND SAFETY

Facility has been inspected by the Occupational Safety and Health Administration NO
Facility has violations cited by the Occupational Safety and Health Administration. NO
Facility has had accidents according to the Occupational Safety and Health Administration. NO

TOTALS (YES) 2

SECTION 2: FACILITY DETAIL REPORTS

...Continued...

AIR EMISSIONS

Facility has emitted air emissions

Facility has compliance data

DATABASE: Aerometric Information Retrieval System (AIRS)

GREENSTAR
2742 E MARKET ST
DES MOINES, IA
EDR ID #I-719153459

Compliance and Violation Data Major Sources:

EPA plant ID:	110037594966
Plant name:	GREENSTAR
Plant address:	2742 E MARKET ST DES MOINES, IA 50317
County:	POLK
Region code:	07
Dunn & Bradst #:	Not reported
Air quality cntrl region:	092
Sic code:	5093
Sic code desc:	SCRAP AND WASTE MATERIALS
North Am. industrial classf:	Not reported
NAIC code description:	Not reported
Default compliance status:	IN COMPLIANCE - INSPECTION
Default classification:	ACTUAL OR POTENTIAL EMISSIONS ARE ABOVE THE APPLICABLE MAJOR SOURCE THRESHOLDS
Govt facility:	ALL OTHER FACILITIES NOT OWNED OR OPERATED BY A FEDERAL, STATE, OR LOCAL GOVERNMENT
Current HPV:	Not reported

Compliance and Enforcement Major Issues:

Air program:	SIP SOURCE
National action type:	STATE CONDUCTED FCE / ON-SITE
Date achieved:	090624
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	STATE CONDUCTED FCE / ON-SITE
Date achieved:	100609
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	STATE CONDUCTED FCE / ON-SITE
Date achieved:	100625
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	STATE CONDUCTED FCE / ON-SITE
Date achieved:	110830
Penalty amount:	Not reported

SECTION 3: DATABASES SEARCHED AND UPDATE DATES

To maintain currency of the following federal, state and local databases, EDR contacts the appropriate government agency on a monthly or quarterly basis as required.

Elapsed ASTM days: Provides confirmation that this report meets or exceeds the 90-day updating requirement of the ASTM standard.

FACILITY RELATED DATABASES

AIR EMISSIONS

ERNS: Emergency Response Notification System

Source: National Response Center, United States Coast Guard
Telephone: 202-267-2180

Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 04/02/2012
Database Release Frequency: Annually

Date of Last EDR Contact: 10/02/2012
Date of Next Scheduled Update: 01/14/2013

WATER DISCHARGES

PCS: Permit Compliance System

Source: EPA, Office of Water
Telephone: 202-564-2496

PCS is a computerized management information system that contains data on National Pollutant Discharge Elimination System (NPDES) permit holding facilities. PCS tracks the permit, compliance, and enforcement status of NPDES facilities.

Date of Government Version: 07/14/2011
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 09/18/2012
Date of Next Scheduled Update: 12/31/2012

PCS INACTIVE: Listing of Inactive PCS Permits

Source: EPA
Telephone: 202-564-2496

An inactive permit is a facility that has shut down or is no longer discharging.

Date of Government Version: 07/29/2011
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 11/12/2012
Date of Next Scheduled Update: 01/28/2013

ERNS: Emergency Response Notification System

Source: National Response Center, United States Coast Guard
Telephone: 202-267-2180

Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 04/02/2012
Database Release Frequency: Annually

Date of Last EDR Contact: 10/02/2012
Date of Next Scheduled Update: 01/14/2013

WASTE MANAGEMENT

RCRA-TSDF: RCRA - Treatment, Storage and Disposal

Source: Environmental Protection Agency
Telephone: 703-308-8895

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

Date of Government Version: 03/15/2012
Database Release Frequency: Quarterly

Date of Last EDR Contact: 11/29/2012
Date of Next Scheduled Update: 01/14/2013

SECTION 3: DATABASES SEARCHED AND UPDATE DATES

...Continued...

RCRA-LQG: RCRA - Large Quantity Generators

Source: Environmental Protection Agency
Telephone: 703-308-8895

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

Date of Government Version: 03/15/2012
Database Release Frequency: Quarterly

Date of Last EDR Contact: 11/29/2012
Date of Next Scheduled Update: 01/14/2013

RCRA-SQG: RCRA - Small Quantity Generators

Source: Environmental Protection Agency
Telephone: 703-308-8895

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month.

Date of Government Version: 03/15/2012
Database Release Frequency: Quarterly

Date of Last EDR Contact: 11/29/2012
Date of Next Scheduled Update: 01/14/2013

RCRA-CESQG: RCRA - Conditionally Exempt Small Quantity Generator

Source: Environmental Protection Agency
Telephone: 703-308-8895

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

Date of Government Version: 03/15/2012
Database Release Frequency: Varies

Date of Last EDR Contact: 11/29/2012
Date of Next Scheduled Update: 01/14/2013

RCRA-NonGen: RCRA - Non Generators

Source: Environmental Protection Agency
Telephone: 703-308-8895

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

Date of Government Version: 03/15/2012
Database Release Frequency: Varies

Date of Last EDR Contact: 11/29/2012
Date of Next Scheduled Update: 01/14/2013

BRS: Biennial Reporting System

Source: EPA/NTIS
Telephone: 800-424-9346

The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/2009
Database Release Frequency: Biennially

Date of Last EDR Contact: 11/30/2012
Date of Next Scheduled Update: 03/11/2013

RAATS: RCRA Administrative Action Tracking System

Source: EPA
Telephone: 202-564-4104

RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/1995
Database Release Frequency: No Update Planned

Date of Last EDR Contact: 06/02/2008
Date of Next Scheduled Update: 09/01/2008

SECTION 3: DATABASES SEARCHED AND UPDATE DATES

...Continued...

CORRACTS: Corrective Action Report

Source: EPA

Telephone: 800-424-9346

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 08/19/2011
Database Release Frequency: Quarterly

Date of Last EDR Contact: 11/12/2012
Date of Next Scheduled Update: 02/25/2013

PADS: PCB Activity Database System

Source: EPA

Telephone: 202-566-0500

PCB Activity Database. PADS Identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 11/01/2010
Database Release Frequency: Annually

Date of Last EDR Contact: 10/19/2012
Date of Next Scheduled Update: 01/28/2013

MLTS: Material Licensing Tracking System

Source: Nuclear Regulatory Commission

Telephone: 301-415-7169

MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 06/21/2011
Database Release Frequency: Quarterly

Date of Last EDR Contact: 09/05/2012
Date of Next Scheduled Update: 12/24/2012

IA AST: Aboveground Storage Tank Sites

Source: Department of Public Safety

Telephone: 515-281-5821

Bulk fuel facilities, commercial fuel operations, private farm sites, and any other storage facility that meets the Department of Public Safety's registration criteria. They register any class I, II or III petroleum product (gas, diesel and oil) above 1,100 gallons.

Date of Government Version: 10/02/2012
Database Release Frequency: Varies

Date of Last EDR Contact: 09/24/2012
Date of Next Scheduled Update: 01/07/2013

IA UST: Underground Storage Tank Data

Source: Department of Natural Resources

Telephone: 515-281-6001

Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 09/06/2012
Database Release Frequency: Quarterly

Date of Last EDR Contact: 09/05/2012
Date of Next Scheduled Update: 12/24/2012

IA LUST: Leaking Underground Storage Tank Data

Source: Department of Natural Resources

Telephone: 515-281-6001

Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 09/06/2012
Database Release Frequency: Quarterly

Date of Last EDR Contact: 09/05/2012
Date of Next Scheduled Update: 12/24/2012

ERNS: Emergency Response Notification System

Source: National Response Center, United States Coast Guard

Telephone: 202-267-2180

Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 04/02/2012
Database Release Frequency: Annually

Date of Last EDR Contact: 10/02/2012
Date of Next Scheduled Update: 01/14/2013

SECTION 3: DATABASES SEARCHED AND UPDATE DATES

...Continued...

HMIRS: Hazardous Materials Information Reporting System

Source: U.S. Department of Transportation

Telephone: 202-366-4555

Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 04/01/2012
Database Release Frequency: Annually

Date of Last EDR Contact: 10/02/2012
Date of Next Scheduled Update: 01/14/2013

WASTE DISPOSAL

NPL: National Priority List

Source: EPA

Telephone: Not reported

National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version: 06/07/2012
Date Made Active at EDR: 09/18/2012
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 07/05/2012
Elapsed ASTM Days: 75
Date of Last EDR Contact: 10/11/2012

PROPOSED NPL: Proposed National Priority List Sites

Source: EPA

Telephone: Not reported

A site that has been proposed for listing on the National Priorities List through the issuance of a proposed rule in the Federal Register. EPA then accepts public comments on the site, responds to the comments, and places on the NPL those sites that continue to meet the requirements for listing.

Date of Government Version: 06/07/2012
Date Made Active at EDR: 09/18/2012
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 07/05/2012
Elapsed ASTM Days: 75
Date of Last EDR Contact: 10/11/2012

DELISTED NPL: National Priority List Deletions

Source: EPA

Telephone: Not reported

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 06/07/2012
Date Made Active at EDR: 09/18/2012
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 07/05/2012
Elapsed ASTM Days: 75
Date of Last EDR Contact: 10/11/2012

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System

Source: EPA

Telephone: 703-412-9810

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 12/27/2011
Date Made Active at EDR: 03/12/2012
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 02/27/2012
Elapsed ASTM Days: 14
Date of Last EDR Contact: 11/28/2012

CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned

Source: EPA

Telephone: 703-412-9810

Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

Date of Government Version: 12/28/2011
Database Release Frequency: Quarterly

Date of Last EDR Contact: 11/28/2012
Date of Next Scheduled Update: 03/11/2013

SECTION 3: DATABASES SEARCHED AND UPDATE DATES

...Continued...

RODS: Records Of Decision

Source: EPA

Telephone: 703-416-0223

Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 02/27/2012

Database Release Frequency: Annually

Date of Last EDR Contact: 09/12/2012

Date of Next Scheduled Update: 12/24/2012

NPL LIENS: Federal Superfund Liens

Source: EPA

Telephone: 202-564-4267

Federal Superfund Liens. Under the authority granted the USEPA by CERCLA of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner received notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Date of Government Version: 10/15/1991

Date Made Active at EDR: 03/30/1994

Database Release Frequency: No Update Planned

Date of Data Arrival at EDR: 02/02/1994

Elapsed ASTM Days: 56

Date of Last EDR Contact: 08/15/2011

IA HWS: Registry of Hazardous Waste or Hazardous Substance Disposal Sites

Source: Department of Natural Resources

Telephone: 515-281-8801

State Hazardous Waste Sites. State hazardous waste site records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. Available information varies by state.

Date of Government Version: 12/31/2011

Database Release Frequency: Annually

Date of Last EDR Contact: 10/22/2012

Date of Next Scheduled Update: 02/04/2013

IA LF: Permitted Solid Waste Management Facilities

Source: Department of Natural Resources

Telephone: 515-281-8801

Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 09/10/2012

Database Release Frequency: Quarterly

Date of Last EDR Contact: 09/11/2012

Date of Next Scheduled Update: 12/24/2012

MULTIMEDIA

TRIS: Toxic Chemical Release Inventory System

Source: EPA

Telephone: 202-566-0250

Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Date of Government Version: 12/31/2009

Database Release Frequency: Annually

Date of Last EDR Contact: 11/28/2012

Date of Next Scheduled Update: 03/11/2013

SSTS: Section 7 Tracking Systems

Source: EPA

Telephone: 202-564-4203

Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 12/31/2009

Database Release Frequency: Annually

Date of Last EDR Contact: 11/01/2012

Date of Next Scheduled Update: 02/11/2013

SECTION 3: DATABASES SEARCHED AND UPDATE DATES

...Continued...

TSCA: Toxic Substances Control Act

Source: EPA

Telephone: 202-260-5521

Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/2006
Database Release Frequency: N/A

Date of Last EDR Contact: 06/29/2012
Date of Next Scheduled Update: 01/07/2013

FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

Source: EPA/Office of Prevention, Pesticides and Toxic Substances

Telephone: 202-566-1667

FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 04/09/2009
Database Release Frequency: Quarterly

Date of Last EDR Contact: 11/26/2012
Date of Next Scheduled Update: 03/11/2013

FTTS INSP: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

Source: EPA

Telephone: 202-566-1667

A listing of FIFRA/TSCA Tracking System (FTTS) inspections and enforcements.

Date of Government Version: 04/09/2009
Database Release Frequency: Quarterly

Date of Last EDR Contact: 11/26/2012
Date of Next Scheduled Update: 03/11/2013

FINDS: Facility Index System/Facility Registry System

Source: EPA

Telephone: Not reported

Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 10/23/2011
Database Release Frequency: Quarterly

Date of Last EDR Contact: 09/11/2012
Date of Next Scheduled Update: 12/24/2012

RMP: Risk Management Plans

Source: Environmental Protection Agency

Telephone: 202-564-8600

When Congress passed the Clean Air Act Amendments of 1990, it required EPA to publish regulations and guidance for chemical accident prevention at facilities using extremely hazardous substances. The Risk Management Program Rule (RMP Rule) was written to implement Section 112(r) of these amendments. The rule, which built upon existing industry codes and standards, requires companies of all sizes that use certain flammable and toxic substances to develop a Risk Management Program, which includes a(n): Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases; Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g the fire department) should an accident occur.

Date of Government Version: 05/08/2012
Database Release Frequency: Varies

Date of Last EDR Contact: 11/01/2012
Date of Next Scheduled Update: 02/11/2013

STORMWATER: Storm Water General Permits

Source: Environmental Protection Agency

Telephone: 202-564-0746

A listing of all facilities with Storm Water General Permits.

Date of Government Version: 06/02/2005
Database Release Frequency: Quarterly

Date of Last EDR Contact: 09/06/2012
Date of Next Scheduled Update: 12/24/2012

SECTION 3: DATABASES SEARCHED AND UPDATE DATES

...Continued...

ENG CONTROLS: Engineering Controls Sites List

Source: Environmental Protection Agency
Telephone: 703-603-0695

A listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

Date of Government Version: 07/18/2012
Database Release Frequency: Varies

Date of Last EDR Contact: 11/05/2012
Date of Next Scheduled Update: 12/24/2012

INST CONTROL: Sites with Institutional Controls

Source: Environmental Protection Agency
Telephone: 703-603-0695

A listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

Date of Government Version: 07/18/2012
Database Release Frequency: Varies

Date of Last EDR Contact: 11/05/2012
Date of Next Scheduled Update: 12/24/2012

INDIAN LUST R1: Leaking Underground Storage Tanks on Indian Land

Source: EPA Region 1
Telephone: 617-918-1313

A listing of leaking underground storage tank locations on Indian Land.

Date of Government Version: 04/12/2012
Database Release Frequency: Varies

Date of Last EDR Contact: 11/01/2012
Date of Next Scheduled Update: 02/11/2013

RADINFO: Radiation Information Database

Source: Environmental Protection Agency
Telephone: 202-343-9775

The Radiation Information Database (RADINFO) contains information about facilities that are regulated by U.S. Environmental Protection Agency (EPA) regulations for radiation and radioactivity.

Date of Government Version: 10/02/2012
Database Release Frequency: Quarterly

Date of Last EDR Contact: 10/02/2012
Date of Next Scheduled Update: 01/21/2013

LUCIS: Land Use Control Information System

Source: Department of the Navy
Telephone: 843-820-7326

LUCIS contains records of land use control information pertaining to the former Navy Base Realignment and Closure properties.

Date of Government Version: 12/09/2005
Database Release Frequency: Varies

Date of Last EDR Contact: 11/15/2012
Date of Next Scheduled Update: 03/04/2013

US CDL: Clandestine Drug Labs

Source: Drug Enforcement Administration
Telephone: 202-307-1000

A listing of clandestine drug lab locations. The U.S. Department of Justice ("the Department") provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

Date of Government Version: 07/11/2012
Database Release Frequency: Quarterly

Date of Last EDR Contact: 09/05/2012
Date of Next Scheduled Update: 12/17/2012

IA ALLSITES: Contaminated Sites Tracking Database

Source: Department of Natural Resources
Telephone: 515-281-4171

All the sites included in the Contaminated Sites Tracking Database. The database includes several regulatory compliance programs and actions.

Date of Government Version: 09/10/2012
Database Release Frequency: Quarterly

Date of Last EDR Contact: 12/03/2012
Date of Next Scheduled Update: 02/04/2013

SECTION 3: DATABASES SEARCHED AND UPDATE DATES

...Continued...

IA DEL SHWS: Delisted Contaminated Sites Listing

Source: Department of Natural Resources
Telephone: 515-281-8801
A listing of sites delisted from the Contaminated Sites Listing.

Date of Government Version: 12/31/2010
Database Release Frequency: Annually

Date of Last EDR Contact: 10/22/2012
Date of Next Scheduled Update: 02/04/2013

IA LIENS: Liens Filed Listing

Source: Department of Natural Resources
Telephone: 515-281-5523
A listing of liens filed with the Iowa Comprehensive Petroleum Underground Storage Tank Fund.

Date of Government Version: 08/08/2012
Database Release Frequency: Varies

Date of Last EDR Contact: 08/07/2012
Date of Next Scheduled Update: 02/11/2013

IA SPILLS: Spills Database

Source: Department of Natural Resources
Telephone: 515-281-4367
Spill reporting data that is collected during the initial report of an incident.

Date of Government Version: 09/10/2012
Database Release Frequency: Annually

Date of Last EDR Contact: 09/11/2012
Date of Next Scheduled Update: 12/24/2012

IA INST CONTROL: Sites with Institutional Controls

Source: Department of Natural Resources
Telephone: 515-242-5818
Sites currently enrolled in the Land Recycling Program that have Institutional Controls.

Date of Government Version: 07/23/2012
Database Release Frequency: Varies

Date of Last EDR Contact: 10/23/2012
Date of Next Scheduled Update: 02/04/2013

IA VCP: Land Recycling Program Sites

Source: Department of Natural Resources
Telephone: 515-242-5818
Sites currently enrolled in the Land Recycling Program.

Date of Government Version: 09/10/2012
Database Release Frequency: Varies

Date of Last EDR Contact: 12/03/2012
Date of Next Scheduled Update: 02/04/2013

IA DRYCLEANERS: Iowa Drycleaner List

Source: Department of Natural Resources
Telephone: 515-242-5100
A listing of drycleaners in Iowa.

Date of Government Version: 02/26/2009
Database Release Frequency: Varies

Date of Last EDR Contact: 10/22/2012
Date of Next Scheduled Update: 02/04/2013

IA BROWNFIELDS: Brownfields Site Listing

Source: Department of Natural Resources
Telephone: 515-281-8489
Brownfields are abandoned, idled, or under-used industrial and commercial facilities where expansion or redevelopment is complicated by real or perceived environmental contamination.

Date of Government Version: 09/10/2012
Database Release Frequency: Quarterly

Date of Last EDR Contact: 12/03/2012
Date of Next Scheduled Update: 02/04/2013

IA NPDES: List of NPDES Permittees

Source: Department of Natural Resources
Telephone: 515-281-4736
The files listed below contain information on facilities that hold NPDES permits, or those that are authorized to discharge wastewater to surface waters in Iowa.

Date of Government Version: 07/29/2012
Database Release Frequency: Varies

Date of Last EDR Contact: 11/19/2012
Date of Next Scheduled Update: 03/04/2013

SECTION 3: DATABASES SEARCHED AND UPDATE DATES

...Continued...

IA AIRS: Minor and Title V Sources Listing

Source: Department of Natural Resources
Telephone: 515-281-8468
A listing of Minor and Title V sources.

Date of Government Version: 09/14/2012
Database Release Frequency: Varies

Date of Last EDR Contact: 09/14/2012
Date of Next Scheduled Update: 12/31/2012

IA TIER 2: Tier 2 Information Listing

Source: Department of Natural Resources
Telephone: 515-725-0302
A listing of facilities which store or manufacture hazardous materials and submit a chemical inventory report.

Date of Government Version: 12/31/2011
Database Release Frequency: Annually

Date of Last EDR Contact: 09/24/2012
Date of Next Scheduled Update: 01/07/2013

IA COAL ASH: Coal Ash Disposal Site Listing

Source: Department of Natural Resources
Telephone: 515-281-8308
A listing of coal combustion residue landfill locations.

Date of Government Version: 09/10/2012
Database Release Frequency: Quarterly

Date of Last EDR Contact: 09/11/2012
Date of Next Scheduled Update: 12/24/2012

IA FINANCIAL ASSURANCE: Financial Assurance Information Listing

Source: Department of Natural Resources
Telephone: 515-242-5086
A listing of financial assurance information for underground storage tank facilities. Financial assurance is intended to ensure that resources are available to pay for the cost of closure, post-closure care, and corrective measures if the owner or operator of a regulated facility is unable or unwilling to pay.

Date of Government Version: 09/06/2012
Database Release Frequency: Quarterly

Date of Last EDR Contact: 09/05/2012
Date of Next Scheduled Update: 12/24/2012

HEALTH AND SAFETY

OSHA: Occupational Safety and Health Administration

Source: DOL, OSHA, Office of Mgmt Data
Telephone: 202-693-1700
Specific inspection, violation and fatality/catastrophe information regarding inspections of interest.

Date of Government Version: 12/31/2010
Database Release Frequency: Annually

Date of Last EDR Contact: 09/24/2012
Date of Next Scheduled Update: 01/07/2013

ATTACHMENT 4

RESUMES



Title: Senior Project Manager

SUMMARY OF EXPERIENCE

Education:

*BS, Electrical Engineering,
Northern Illinois University*

*BS, Civil Engineering,
University of Illinois*

*OSHA 40-hour HazMat
Training*

*OSHA 8-hour On-site
Management &
Supervisor Training*

Mr. Bazal has over 6 years of extensive experience as a project manager working with REA Environmental and Bazal Properties. As a project manager, Mr. Bazal, has managed projects nationwide of over 300 Phase I Environmental Site Assessments. Mr. Bazal has managed and acquired the following:

- Responsible for ensuring district compliance with Federal, State, and Local regulations related to hazardous materials.
- Projects performed for governmental agencies, private property owners, non-profit organizations, lending institutions, schools/universities, hotels and others.
- Updating and delivering employee training programs related to hazardous materials and waste.
- Supervising work of outside contractors involved in removing or testing hazardous materials.
- Keeping informed of current and proposed regulations related to program areas assigned.
- Performing related fieldwork as required. Including sampling hazardous and/or industrial waste and bulk sampling of material suspected of containing lead or asbestos.
- Maintaining operation and inspection logs (O&M's).
- Submitting clear and concise written reports based on field inspections.
- Recommending and coordinating the development of programs needed to comply with hazardous materials regulations. Analysis and litigation support for petroleum hydrocarbon contaminated and UST sites. Providing coordination with regulatory agencies; concerning hazardous materials.



K-PLUS ENGINEERING, LLC

Education:

*MM, Finance and
Managerial Economics,
J.L. Kellogg Graduate
School of Management,
Northwestern University*

*MPH, Industrial Hygiene
and Safety Engineering,
University of Illinois at
Chicago*

*BS, Civil Engineering,
University of Illinois,
Urbana, IL*

Licenses/Certifications:

*Professional Engineer:
IL, IN, IA, FL, KY, LA, MI,
MN,MO, NC, OH, PA,SC,
TX, and WI,*

*AHERA Building Inspector:
IL and IN*

*LUST Site Assessor:
WI and IN*

*OSHA 40 Hour HazMat
Training*

*OSHA 8-hour On-site
Management &
Supervisor Training*

*HM-126F Safe HazMat
Transportation Training*

Radon Detection Services

*Corrective Actions for
Ground Water
Contamination*

DANIEL M. CAPLICE

Mr. Caplice is a licensed professional engineer in multiple states with 30 years of engineering and consulting experience. He has an in-depth understanding of local, state and federal regulations and has performed projects in accordance with CERCLA, RCRA, CWA/Oil Pollution Act, CAA, TSCA, and FIFRA requirements. His specialized areas of expertise are evaluation of contaminated properties, assessment of risk and endangerment, regulatory compliance and permitting, hazardous waste management, industrial processes, Brownfield development, and site management including investigation, remediation, construction management, and monitoring.

Currently, a Partner at K-Plus Engineering, a 20 year-old, full service, engineering and consulting company with offices in Illinois, Indiana, Wisconsin, North Carolina, and California. At K-Plus, Mr. Caplice is responsible for managing and directing the company in addition to his ongoing work as an expert in environmental matters.

For the past 25 years, he has served as a consulting environmental expert for numerous private, public, and non-profit institutions. His responsibilities have included designing and directing various projects, particularly voluntary cleanups of contaminated soil and ground water sites, underground storage tank remediations, and NPL evaluations, investigations, and cleanups. Mr. Caplice has worked extensively on the investigation and cleanup of numerous active and abandoned industrial facilities, landfills, and other waste sites. He has also served as the project manager or senior technical advisor on hundreds of Phase I and Phase II Environmental Assessments at a multitude of sites, from small, undeveloped parcels of property to multi-location industrial facilities. Finally, Mr. Caplice has served as a technical expert on numerous State and Federal cases pertaining to the investigation and cleanup of contaminated properties as well as industrial hygiene and safety related issues pertaining to the investigation and remediation of contaminated property.

Mr. Caplice also has experience in the regulatory analysis of projects for compliance with federal and state environmental regulations, guidance, protocols, and procedures. His environmental regulatory experience includes evaluating compliance of private party actions, reviewing and preparing comments on proposed environmental laws and administrative rules, reviewing site documents and preparing detailed comments, and serving as a technical expert in various environmental cases. Mr. Caplice is also regular speaker at environmental conferences and seminars.

Prior to joining K-Plus, Mr. Caplice served in several capacities for the USEPA, Region 5, including Manager of a Superfund unit responsible for sites in Illinois and Indiana, and Manager of the Pre-Remedial Unit that was responsible for the investigation and assessment of abandoned waste sites (CERCLIS sites) for possible inclusion on the Superfund National Priorities List. While at the USEPA, he also regularly represented the Agency at the International Joint Commission on Water Quality in the Great Lakes.