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WM. W. McKINLEY
1926-1981
GEORGE F. NEWMAN
RETIRED

February 8, 1989

Ms. E. Jane Kloeckner
U. S. EPA Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: Coffman and Cunningham
Docket No. VII 88-H-0013

Dear Jane:

Enclosed please find proposed Closure Plan. Enclosed as well are two checks in the amount of $250.00 and a letter I received from Cedar Falls Trust & Savings Bank regarding financial assurances. Please advise if anything further is necessary at this time.

Very truly yours,

REDFERN, McKINLEY, MASON & DIETER

By Bob
Robert J. Dieter

RJD:krs

FEB 13 1989
EPA-CNSL-CERCLA

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FEB 14 1989
IOWA SECTION

R00127723
RCRA RECORDS CENTER

COFFMAN BODY SHOP
1906 STATE ST. PH. 277-3288
CEDAR FALLS, IA 50613

CERTIFIED

12338

$ 250.00

2-8 1989 February 6 1989

72-178/739

The Cedar Falls Trust & Savings Bank

PAY TO THE ORDER OF United States Treasury Dorothy D. Heine Cashier $ 250.00

Two hundred fifty dollars & 00/100 DOLLARS

Cedar Falls Trust & Savings Bank
Cedar Falls, Iowa 50613 A 'BANKS OF IOWA' BANK

FOR Docket # VII 88 H-0013

Connie Coffman

⑈012338⑈ ⑆073901783⑆ 821520100⑈

COFFMAN BODY SHOP
1906 STATE ST. PH. 277-3288
CEDAR FALLS, IA 50613

CERTIFIED

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RECEIVED
FEB 14 1989
IOWA SECTION

Cedar Falls Trust & Savings Bank

A 'BANKS OF IOWA' BANK

February 7, 1989

Robert Dieter
Redfern, McKinley, Mason & Dieter
315 Clay Street
Cedar Falls, IA 50613

RE: Ron Coffman, Estrada Inc. d/b/a Coffman's Body Shop

Dear Mr. Dieter:

We appreciate having the business of Coffman's Body Shop, but simply, are not in a position to underwrite an open letter of credit for financial assurance purposes to the Environmental Protection Agency.

I don't believe that any financial institution or company would undertake that for an entity as small as Coffmans, and accordingly, must deny your request.

Very truly yours,

David G. McDermott

David G. McDermott
Senior Vice President

ph

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IOWA SECTION

222 Washington Street • Cedar Falls, Iowa 50613 • (319) 277-1320

ESTRADA, INC.

d/b/a

COFFMAN BODY SHOP

AND

MEL CUNNINGHAM

d/b/a

BIG WOODS AUTO

CLOSURE PLAN

EPA ID# 1AD981708001

RE: Estrada, Inc. d/b/a
Coffman's Body Shop
E.P.A. I. D. #IIAD981708001
Docket No. VII 88-H-0014

Mel Cunningham d/b/a
Big Woods Auto
Docket No. VII 88-H-0013

RECEIVED
FEB 14 1989
IOWA SECTION

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EXHIBITS

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Cedar Falls, Iowa

B. Aerial Photo with Site Plan - Big Woods Road
Cedar Falls, Iowa

C. Lucite Acrylic Lacquer
Material Safety Data Sheet

D. Lacquer Thinners and Cleaning Solvents
Material Safety Data Sheet

E. Sample Chain of Custody Certification

F. Material Safety Data Sheet dated 10-20-83

G. Material Safety Data Sheet dated 1-14-85

I. INTRODUCTION

On February 3, 1987, EPA Field Inspector, David Whiting visited Coffman's Body Shop at 1906 State Street, Cedar Falls, Iowa, to perform an EPA inspection. He determined that Coffman was a small generator of hazardous waste with the 100-1000 kg per month vategory, by viture of waste paint and paint thinner.

Coffman's stored the waste materials on site in 55 gallon drums and had a sixteen month accumulation of waste located there. Prior to that time, Coffman's had done business at another location and had removed its waste containing drums to a location on Big Woods Road, Cedar Falls, Iowa, owned by Mel Cunningham. Estrada, Inc. d/b/a Coffman's Body Shop, Ron Coffman it's operations officer, and Mel Cunningham, d/b/a Big Woods Auto were cited for exceeding permitted storage terms. Both Coffman's and Cunningham have agreed to implement a clean closure plan to demonstrate that no spillage of waste paint or thinner took place, or in the alternative, if any contamination is found, to take appropriate action in light of the findings and the threat posed to environment or to human health. No known spillage has taken place at either location. Cunningham was a mere accomodation party on behalf of Coffman's uin providing a temporary storage location. Accordingly Coffman's Body Shop has taken the responsibility for implementing closure at both locations.

II. CLOSURE PLAN

Closure activities consist of implementation of the soil sampling plan to determine if spillage of waste paint thinner (designation F003) occurred at either the 1906 State Street or the Big Woods location and, if so, whether the levels exceed an action level.

A. Determination of an action level will be by reference to the soil sampling plan and comparison of the analysis results at each location to the background levels established by U. S. Soil Conservation Service, EPA, and Iowa State University.

B. No Action Level. If the comparison of analysis results demonstrates that the levels do not pose a contamination or potential harm to the environment or to human health, the closure plan shall be deemed to have been fully implemented with no further maintenance or controls subsequent to the completion of closure activities and closure certification shall proceed accordingly.

C. Action Level. In the event the analysis results demonstrate levels of contaminants which pose a potential harm to the environment or to human health, action must be taken to meet the closure plan performance standard. For the purpose of this closure plan, the "closure plan performance standard" is defined to mean that all soil at the location designated must be decontaminated to analytic concentrations found in a background control sample taken at that location, or decontaminated to an EPA approved health-based standard.

D. Action Plan. If soil contamination at or above the action level is identified, a subsequent and more extensive soil sampling program will define the vertical and horizontal extent of the contamination and will be used to define the area of contamination. A site map will be developed after engineering review of the data, for use by excavation crews to perform their work. The area will be carefully staked out and all contaminated soils will be excavated and transported in accordance with all EPA rules and regulations including disposal at approved hazardous waste sites. Subsequent testing of remaining soil will confirm that the closure plan performance standard has been achieved.

E. Certification of Closure. Certification of closure will be accomplished by Coffman's report of closure activities appropriate to the implementation of the

closure plan, including the certification of the supervising engineer, the sampling plan, the chain of custody log, the laboratory results, appropriate manifests and evaluation of decontamination.

F. Post-Closure Plan. If the closure plan performance standard cannot be achieved, a post-closure plan will be developed based on the analysis and impediments encountered in achieving the closure plan performance standard.

III. PERFORMANCE STANDARD

The closure plan is considered to be the minimal effort to be undertaken by the owner. The goal and performance standard to be achieved are determination that no concentrations of volatile organic compounds or heavy metals are present at any level which pose a threat to the environment or to human health.

The testing and analysis must be accomplished in accordance with the material safety data sheets attached hereto as Exhibits C and D, which identify the metals and substances at which this hazardous waste activity and determination is directed.

SOIL SAMPLING PLAN

IV. SITES.

This soil sampling plan shall be conducted at two (2) locations.

A. 1. The Coffman Site is 1906 State Street, Cedar Falls, Iowa. Exhibit A attached is an aerial photograph depicting the site with accompanying sketch depicting the location of sample sites. The five samples taken at the Coffman site will be designated in accordance with the location of each sample as depicted on Exhibit A and will be labeled accordingly as Samples C-1, C-2, C-3, C-4 and C-5.

2. The Coffman site is hard packed gravel, dirt, sand and stone. It is flat.

3. The Coffman site is selected as the proposed sampling location because it is the exact location of the barrels observed by the EPA field inspector on February 3, 1987, and if spillage occurred would be the location of the spillage. The purpose of this sampling plan is to determine if spillage occurred at this location.

B. 1. The Cunningham Site is Big Woods Road, Cedar Falls, Iowa. Exhibit B attached is an aerial photograph depicting the site with accompanying sketch depicting the location of sample site. The five samples taken at the Big Woods Road site will be designated in accordance with the location of each sample as depicted on Exhibit B and will be labeled accordingly as Samples BW-1, BW-2, BW-3, BW-4 and BW-5.

2. The Big Woods site is light sandy loam soil with a covering of indigenous native grasses. It is flat.

3. The Big Woods site is selected as the proposed sampling location because it is the exact location of the storage barrels observed by the EPA field inspector on February 3, 1987, and if spillage occurred would be the location of the spillage. The purpose of this sampling plan is to determine if spillage occurred at this location.

C. SAMPLING METHODOLOGY.

1. Engineering Supervision and Chain of Custody Assurance.

Supervision of the sampling procedure will be accomplished by the City Engineer's office of the City of Cedar Falls, Iowa. The Supervisor is a professional engineer (P.E. designation) with emphasis in civil engineering. The engineer will certify that samples were taken in accordance with this plan including certification of each sample site, use of sample methodology according to this plan, sample labeling according to this plan, and delivery of the samples to the laboratory.

The engineer must maintain each sample in his possession and custody from the extraction of the sample until delivery of the samples to the laboratory and must certify a chain of custody of samples consisting of the Engineer and the laboratory and excluding any other person.

2. Sample Size.

Each sample shall consist of a uniform soil core or "plug" not less than two inches in diameter. Each sample core shall extend from the ground surface to a depth of six inches.

3. Sampling Tools, Usage and Decontamination.

Each soil sample shall be extracted by use of a clean new steel cylinder having a diameter of not less than two inches and a length of not less than six inches. Each steel cylinder shall be used to extract one soil sample only and shall not be reused. The application of manual power to each cylinder when placed in an upright position at each sample location will assure the soil sample core or "plug" obtained is of uniform diameter and depth and is representative of each soil sample location. Each soil core cylinder well be appropriately labeled after extraction (ex. C-1, C-2) and the labeled steel cylinder with soil core contents will be sealed into a new ziplock plastic container.

The sealed container, steel cylinder and soil core sample contents will be delivered to the laboratory by the supervising engineer and held pending test results and analysis.

In the event that the testing and analysis indicates hazardous wastes are present and have contaminated the sampling tools, the tools will be decontaminated at the Coffman, 1906 State Street site using a detergent cleaner. The cleaner will be added to Coffman's liquid hazardous waste storage and will be manifested offsite by Coffman's regular licensed EPA hazardous waste hauler.

4. Soil Sample Holding Time.

Both soil sampling sites, all personnel and the laboratory are venued in Cedar Falls, Iowa. No travel or shipment is required in excess of fifteen statute miles. The soil sample holding time will be measured in hours from obtaining the sample until delivery to the laboratory. The laboratory testing and analysis procedures must not exceed ten days. The entire soil sample holding period will be in accordance with EPA Publication SW-846 and must not exceed fourteen days.

5. Soil Samples Field Preservation.

After extraction all soil samples must be transported and stored in insulated containers with a temperature not exceeding four degrees celsius in compliance with EPA SW-846.

6. Soil Sample Testing and Report Schedule.

Soil sampling must be accomplished not later than 30 days after the EPA approval of the closure plan, provided the soil sampling shall not take place until and unless the outside air temperature exceeds 40 degrees fahrenheit and the soil sample locations are not frozen.

Laboratory testing and analysis reports must be furnished to the EPA not later than fourteen days after soil sampling.

7. Site Coordination and Safety.

The project coordination will be provided by the company management in interface with the supervising engineer, the EPA and the laboratory.

The health and safety of the project participants must be observed as paramount. Risk from extremes of weather, mechanization, contamination, or any other risk unforeseen may cause cessation, postponement, and rescheduling of said sampling in the consensus of the participants or the company safety officer.

D. Testing and Analysis.

The laboratory performing the testing and analysis is:

National Environmental Testing, Inc.
1922 Main Street
P.O. Box 625
Cedar Falls, Iowa 50613

Test methods must be in accordance with EPA publication SW-846. "Test methods for Evaluating Solid Waste", and the laboratory shall so certify in its analysis report.

V. CLOSURE COST ESTIMATE

The estimated cost of closure is the following:

A.	Materials for sampling -	$ 100.00
B.	Laboratory Testing -	$1,200.00
C.	Certification -	$ 100.00
D.	Contingency for Action level -	$2,000.00
	Total	$3,400.00