United States Environmental Protection Agency

U.S. EPA Proposes Change to Soil Cleanup Plan

Lammers Barrel Superfund Site
Beavercreek, Ohio June 2023

Read the proposed plan and view a presentation about the proposed plan:
Online at www.epa.gov/superfund/lammers-barrel-factory.

Share your opinion

If you have questions or comments, U.S. EPA invites you to participate in the cleanup process for the Lammers Barrel Superfund site. Your input helps the federal agency determine the best way to clean up the contamination at the site.

You may comment on the proposed plan from June 16 to July 15:

- Send via email to U.S. EPA at palomeque.adrian@epa.gov.
- Online at www.epa.gov/superfund/lammers-barrel-factory
- During the public meeting on June 22 (*see "Public meeting" on back page*.)
- Fill out and mail the enclosed comment form.

Contact information

If you have questions, contact one of these team members:

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Remedial Project Manager
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Call U.S. EPA's Chicago office toll-free at 800-621-8431, 9 a.m. – 5:30 p.m. weekdays.

U.S. Environmental Protection Agency working with Ohio Environmental Protection Agency, is proposing a change to the cleanup plan[1] for the contaminated soil at the Lammers Barrel Superfund site. The site consists of contaminated soil on the site and an area of contaminated groundwater both beneath the site and off the site. The original cleanup plan for the site was selected in 2011 and involved remedies for both the contaminated groundwater and soil. This proposed change is only to the cleanup plan for the contaminated soil. It also does not change any other components to the cleanup plan selected in 2011.

The new plan would address additional contaminated soil and use a method of heating the soil to remove the contamination instead of using soil biological treatment (soil mixing with zero valent iron, portland cement, and water). The changes are in response to information collected during the remedy design. EPA discovered more soil required cleanup than previously anticipated.

It was also determined that the current remedy, an in-situ biological treatment, will require four times more soil to be treated than originally anticipated. This new finding makes the current cleanup plan more difficult to implement and more costly. Instead, EPA is proposing to treat the soil with heat – either electric resistance heating or thermal conductive heating - to extract the contaminants.
(*See detailed descriptions on all the Alternatives on Pages 3 to 5*.)

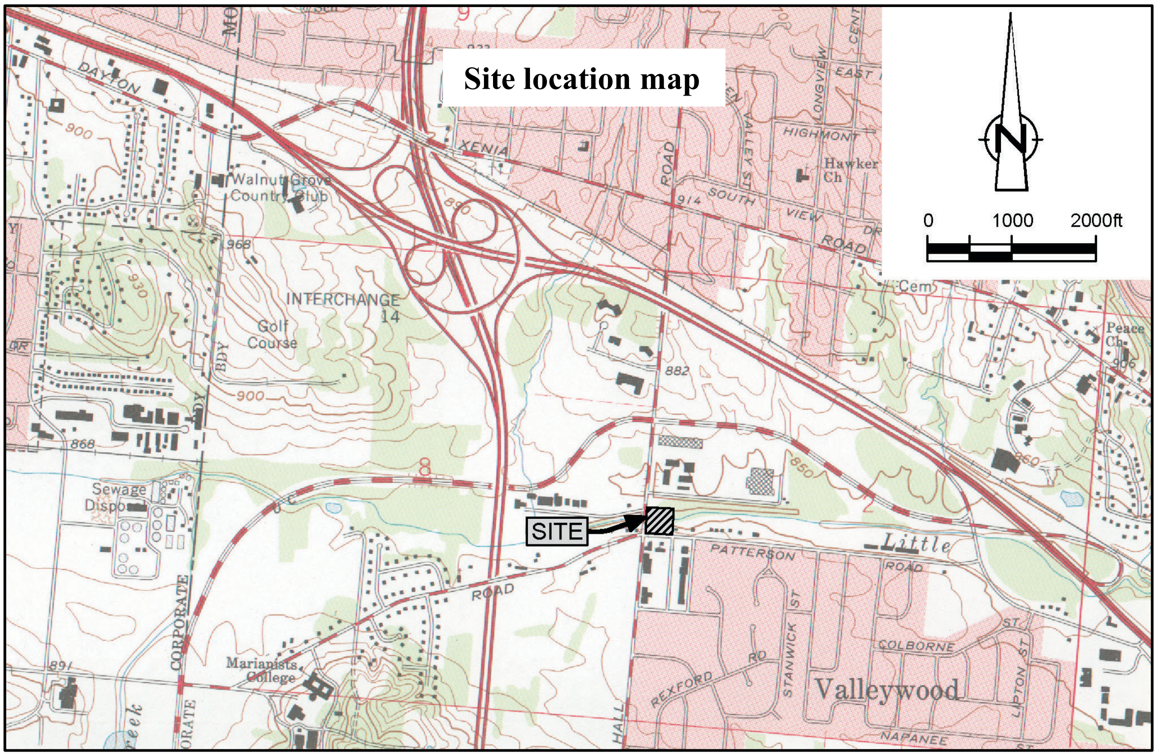
Your comments are needed

U.S. EPA will review all comments received during the public comment period before making a final decision on the proposed change to the soil cleanup plan. (*See box, left, for ways you can participate in the decision-making process*.) The federal agency may modify its proposed change to the cleanup plan or select another option based on new information or public comments, so your opinion is important.

This fact sheet gives you background information, describes the proposed change to the soil cleanup plan and explains U.S. EPA's recommendation. You can find more details in a document called the *Proposed Plan for Amendment to Selected Remedy Lammers Barrel Superfund Site*, available on the web and at the local information repository (*see box, last page*). We encourage you to review and comment on the proposed change to the soil cleanup plan.

U.S. EPA will respond to comments in a document called a "responsiveness summary", which will be included in U.S. EPA's amended "record of decision," or ROD, that describes the final amended cleanup plan. The federal agency will announce the final amended cleanup plan in *The Beavercreek News Current*, and the *Dayton Daily-News*, place a copy in the information repository and post it on the web at www.epa.gov/superfund/lammers-barrel-factory.

[1] *Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) requires publication of a notice of a change to a cleanup plan and a proposed plan amendment document explaining that proposed change. The proposed plan amendment must also be made available to the public for comment. This fact sheet summarizes information contained in documents that can be reviewed at the local repository at the Beavercreek Community Library or online at www.epa.gov/superfund/lammers-barrel-factory.*



Background

The site is the former location of the Dayton-Xenia Railway Co., the Moran Paint Co., the Dayton Oil Co., Lammers Barrel Corp. and the Kohnen and Lammers, Inc. The Dayton-Xenia Railway Co. owned the site property from 1926 to 1944. During that time, they operated a railroad car maintenance and repair facility at the site. The repair facility included an underground maintenance bay beneath the service tracks where repairs could be made to the undercarriages of the cars. The Moran Paint Co. operated at the site from 1948 to 1952. The company reportedly manufactured paint, lacquers, paint removers and esterified tall oil at the site. Subsequently, the Dayton Oil Co. conducted operations at the site beginning in 1952, following the closure of the Moran Paint Co. operations at the site. A solvent recovery business and a barrel reconditioning business operated at the facility at the site between 1953 to 1969 under various company names (e.g., Kohnen and Lammers, Inc., Lammers Barrel Corp.). Chemicals, including volatile organic compounds, or VOCs, and polycyclic aromatic hydrocarbons, or PAHs, were stored in aboveground storage tanks at the site. Historical aerial photographs indicate that operations, including chemical storage, were conducted on both the northern and southern portions of the site.

The solvent recovery facility was destroyed in a fire that began on September 30, 1969. The quantity and specific chemicals released during the fire are unknown. Site restoration activities completed after the fire reportedly included debris removal and placement of an unspecified depth of cover material. In 1985, contamination was discovered in residential drinking water wells above the drinking water standards for VOCs such as vinyl chloride, trichloroethene, tetrachloroethene and cis-1,2-dichloroethane. As a result of these findings, nine residences were connected to an existing water main along East Patterson Road in January 1986. Ohio EPA and U.S. EPA conducted various investigations throughout the 1990s and in 2000, an additional four homes were connected to the county water supply due to well water contamination. From 2000 to 2002, the U.S. Army Corps of Engineers conducted studies at the site to understand the hydrogeologic characteristics. In 2002, U.S. EPA signed a legal agreement with a group of 21 parties considered potentially responsible for the contamination, called PRPs, to conduct a thorough investigation into the contamination at the site, called a remedial investigation. It also required the PRPs to evaluate cleanup options for the site, called a feasibility study. In 2002, U.S. EPA proposed the site be added to the National Priorities List, or NPL, and in 2003, the site was officially added to the NPL. The NPL is a list of sites eligible for investigation and cleanup under the Superfund program.

The remedial investigation began in 2003 and was completed in 2008. In 2008, the legal agreement requiring the PRPs to conduct the remedial investigation and feasibility study was amended to add 21 additional parties increasing the number of PRPs to 41. In 2011, U.S. EPA approved the feasibility study. In September 2011, U.S. EPA selected the final cleanup remedies for the site. The selected remedy for impacted soils was in-situ biological treatment. The selected remedy for the groundwater was in-situ groundwater treatment using enhanced reductive dichlorination, or ERD. Institutional controls were also part of the overall remedy to prohibit development of the site for residential use and prohibit installation of drinking wells on the site.

Summary of site risks

As part of the investigations at the site, U.S. EPA evaluated the current and future risks to human health and the environment from contaminants at the site in what is called a human health assessment (for people) and an ecological risk assessment (for the environment). The results of the human health assessment indicated that under current site conditions, there is little potential for exposure to site-related contaminants because the site is vacant, fenced and zoned for industrial use. The human health assessment further concluded that no unacceptable non-cancer hazards or cancer risks exist under current conditions, even in the assumed scenario of an unauthorized trespasser entering onto the property. However, U.S. EPA believes active measures, such as those proposed in this change to the soil cleanup are necessary to protect public health or welfare or the environment from actual or threatened releases of hazardous substances into the environment in the future.

Summary of cleanup alternatives

U.S. EPA evaluated three soil cleanup alternatives - no action, in-situ biological treatment (the current remedy), and in-situ thermal treatment to address the potential risks associated with contaminated soil and perched water (saturated soil above the groundwater table) at the site. The Agency developed these alternatives and evaluated each option in detail against the selection criteria established by federal law (*see the table at the bottom of Page 6 for an explanation of the evaluation criteria*).

Common elements

All of the alternatives except "no-action" would include placing a 2-foot soil cover over the treated material to eliminate potential exposure to the contaminants. Following placement of the soil cover, restrictions on certain uses at the site will be established thereby eliminating the potential exposure to contaminants in the subsurface soil. All the alternatives except "no-action" would also require institutional controls, such as an easement or covenant, to limit the use of the property and to ensure that groundwater is not used for drinking water purposes. In addition, monitoring to ensure the effectiveness of the remedy is a component of all except the "no-action" alternative.

Alternative 1 – No action

The "no action" alternative is evaluated to establish a baseline for comparison. Under this alternative, U.S. EPA would take no action to clean up the soil or perched water contamination. Additionally, this alternative would not include implementing land use restrictions or any measures to control exposure to the contamination. Existing fencing that restricts access would not be maintained. The potential for people, plants and animals to be exposed to the contamination would not be addressed. Contamination on the site would remain in place.

Estimated Cost: $0
Estimated Construction Timeframe: 0 months

Alternative 2 – In-situ biological treatment (ISBT) (Current remedy)

In-situ biological treatment will involve the mixing of contaminated soil in place with zero valent iron and Portland cement to immobilize the contamination. The iron and the cement will be mixed with water to form a slurry prior to the biological treatment. This slurry will be added to the contaminated soil in place, which will result in an increase in the total volume of the soil mixture. As soil within the treatment areas includes very dense clay with low moisture content, a significant amount of water needs to be added to the slurry to make the clay workable. A soil treatability study conducted indicated that the treatment would cause an increase of approximately 55 percent in volume of the soil mixture. This increase in volume, in addition to the increase in volume of soil requiring treatment that was discovered during the design process, is expected to lead to an overall treated soil volume that is almost four times that was anticipated in the 2011 cleanup plan. Two options are being considered to address the additional volume of treated soil: on-site containment that would entail construction of retaining structures along the creek to retain the additional volume of soil (Alternative 2A), and a combination of on-site containment with off-site disposal (Alternative 2B). Should biological treatment be selected as the final remedy, the management of additional soil volume will be addressed in detail in the 95 percent design document. In-situ biological treatment mixing will result in a block of immobilized soil that minimizes leaching and migration of contaminants in the subsurface soil.

Alternative 2A – In-situ biological treatment plus on-site containment/construction of retaining structure along the creek to retain the additional volume of soil

One option for managing the additional volume of treated soil is via on-site containment. For the biologically treated area north of Little Beaver Creek, Area A (*see area in green on diagrams on Page 5*), concrete blocks will line the perimeter of the treatment area. These concrete blocks would extend above the surface to contain the treated bulked material, thus increasing the site grade by 2 feet. An additional 2 feet of soil cover (*as described under "common elements"*) will be placed over the biologically treated material for a total grade increase of 4 feet. For the biologically treated areas south of Little Beaver Creek, a 21 feet deep sheet pile wall (12 feet below ground and 9 feet above ground, subject to engineering design) will be installed along all treatment area perimeters raising site grade in treated areas by 9 feet, which will include the elevation change from the bulking from the treatment along with the additional 2 feet of soil cover.

Estimated Cost: $7.74 million
Estimated Construction Timeframe: 12 months

Alternative 2B – In-situ biological treatment (ISBT) plus a combination of on-site containment with off-site disposal

A second option for managing the additional volume of treated soil is a combination of off-site disposal and on-site containment. For this option, all treatment areas will be pre-excavated to a depth of 3 feet and the excavated material will be disposed of at a licensed off-site facility prior to the biological treatment. Then concrete blocks will be used to line the perimeter of treatment areas to contain the bulked treated material causing an increase in grade from 2 to 4 feet depending on the area. The additional 2 feet of soil cover (*see "common elements", Page 3*) and associated concrete blocks will be placed over the biologically treated material for a total grade increase of 4 to 6 feet.

Estimated Cost: $7.42 million

Estimated Construction Timeframe: 12 months

Alternative 3 – In-situ thermal treatment (ISTT) – (Proposed change to the remedy)

U.S. EPA's recommended change

U.S. EPA is proposing to use in-situ thermal treatment to clean up contaminated soil on the site using either electric resistance heating, or ERH (Alternative 3A), or thermal conductive heating, or TCH (Alternative 3B). In-situ thermal treatment is the process by which heat is applied to the subsurface using one of several heat delivery methods to cause the contaminants to turn to vapor, become mobile and be released allowing them to be captured. This will increase contaminant recovery rates. While the increased mobility and vaporization of contaminants enhances recovery rates, the nature of this process also presents some inherent risks. The risks of enhanced vapor migration, and the subsequent potential effects, such as vapor intrusion, on nearby properties, will be evaluated and addressed during the pre-design and design process. Vapor intrusion is the process by which contaminated vapors can move through the soil and seep through cracks in basements or foundations, sewer lines and other openings of buildings. Design elements to monitor and address these hazards might include items such as vapor barriers, site boundary vapor recovery trenches and perimeter air monitoring.

Site contaminants are highly responsive to thermal treatment at temperatures from 90 to 95 degrees Celsius, which can be achieved by using either thermal conductive heating (TCH) or electric resistance heating (ERH) technologies. Both technologies have also been successful in both unsaturated (above the water table) and saturated (groundwater) zones.

In addition, a wellfield will be installed using a grid of both heater and extraction wells that encompasses the target treatment area. Energy in the form of steam injection, electricity, or natural gas burners will be applied to the heater wells, and the extraction wells will remove soil vapor, steam, liquids through induced vacuum and pumping.

Regardless of heating technology used both ERH and TCH technologies will heat the site to a target temperature range of 90 to 95 degrees Celsius. This high temperature could damage the PVC monitoring wells and/or injection wells within the thermal treatment area. In addition, if ERH is selected, there is a possibility the wells could "short circuit." Therefore, the wells will either be abandoned or replaced before and/or after the treatment as needed.

The thermal treatment will involve installation of the network of heater and extraction wells, construction of a temporary thermal and vapor retarding barrier that will cover both the north and south treatment areas, and installation of both an above-grade fluid piping system and a fluid treatment system. Both technologies will require a small utility and pipe bridge that will join the north and south treatment areas to the treatment system. Finally, both technologies will require electrical service to be provided by the local power utility, as well as drinking water and sanitary sewer connections to the Greene County Sanitary Engineering Department (GCSED) collection system. The GCSED was contacted to discuss the nature of the project and any specific requirements for discharge. GCSED noted that the project would require an application for an industrial wastewater discharge permit for a new industrial user, and pretreatment discharge standards would be determined after review of the permit and the expected operating conditions. After construction of the thermal treatment system is complete and acceptance testing has been performed, both technologies are expected to require approximately six months of active heating. After the treatment is complete, the site will have reduced VOC concentrations by an anticipated 95% or more. Soil sampling will be conducted following the treatment to verify the effectiveness.

Additional steam injection wells may be installed in the soil south of Little Beaver Creek. The extent to which supplemental steam injection is necessary to treat this area will depend in part upon the thermal technology that is selected during design. It is likely to be required if the TCH method is selected but may not be necessary if ERH is used.This decision will be made during the design phase based on the results of thermal modelling.

Alternative 3A – In-situ thermal treatment (ISTT) using electric resistance heating (ERH)

With Alternative 3A, the subsurface will be heated with electrodes that are connected to a power delivery system. The power delivery system will induce an electric current through the soil both between adjacent electrodes as well as from each electrode to adjacent extraction wells. Electrodes will be spaced on approximately 18 to 20-foot centers though this value may vary based on the electrical profile of the site. The ability of the site soil and perched water to conduct electricity, will be measured during a pre-design test. This will govern the amount of electrical energy (heat) that can be successfully delivered to the subsurface. Heating is often highly effective in fine-grained soils such as those at the site.

Estimated Cost: $6.09 million

Estimated Construction Timeframe: 12 months

Alternative 3B – In-situ thermal treatment (ISTT) using thermal conductive heating (TCH)

With Alternative 3B, the subsurface will be heated using resistive heater rods or natural gas-fired heaters. In the case of the resistive heater rods, power delivery units supply electricity to the rods, which in turn increase in temperature and will heat the well casings to a high temperature. If gas-fired heaters are used, each heater well will be fitted with an individual burner assembly. The high-temperature well casings thermally conduct the heat outward through soil particle to particle contact. This heating approach can be highly effective in lower permeability soils such as those at the site. TCH heater wells are typically spaced on 12 to 15-foot centers but this may vary based on the results of a pre-design test and thermal modelling to be conducted during design.

Estimated Cost: $6.61 million

Estimated Construction Timeframe: 12 months

Diagram of Alternative 3A

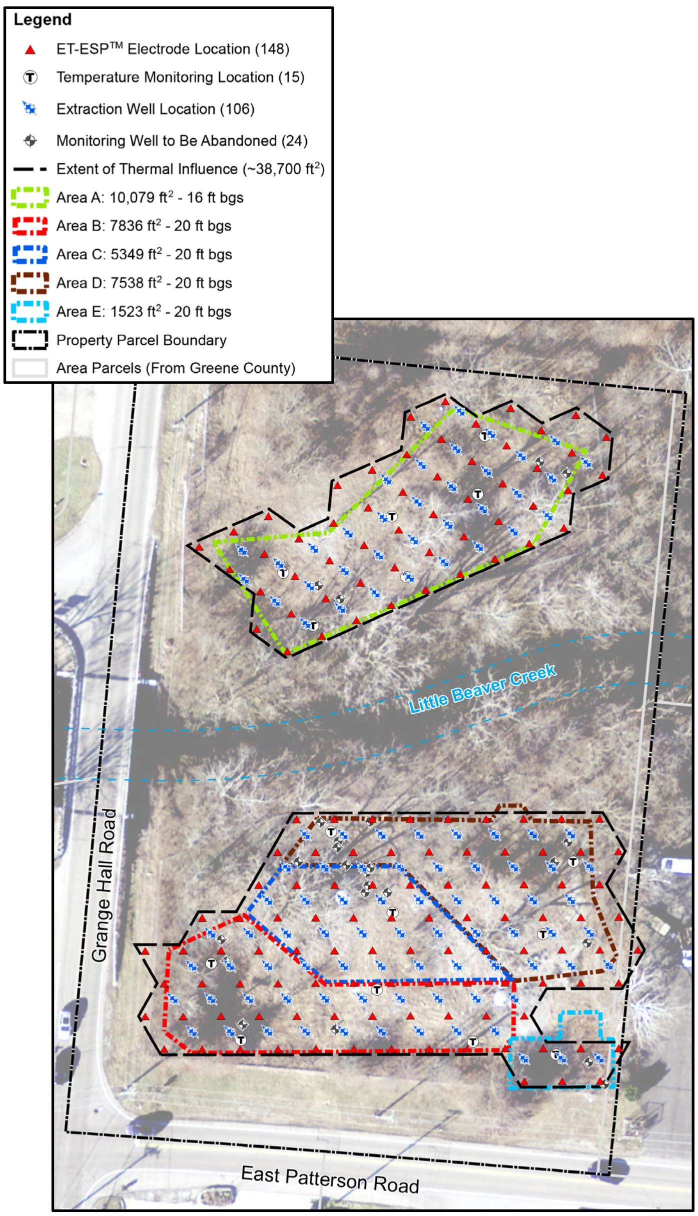
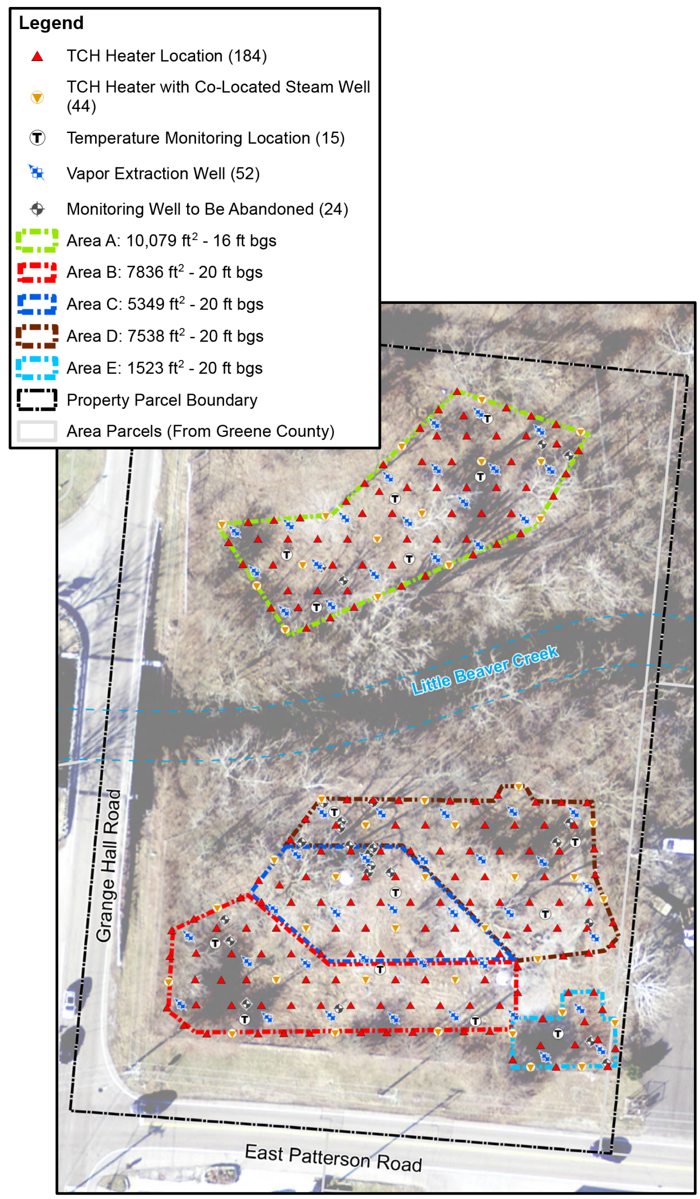


Diagram of Alternative 3B



Summary of the evaluation of the alternatives

The evaluation criteria are used to help compare how the alternatives will meet cleanup goals. The table on this page compares each alternative against the nine criteria explained in the box below.

Evaluation Criteria	Alternatives 1	2A	2B	3A*	3B*
Overall Protection of Human Health and the Environment	□	◆	◆	◆	◆
Compliance with ARARs	N/A	◆	◆	◆	◆
Long-Term Effectiveness and Permanence	□	❖	❖	◆	◆
Reduction of Toxicity, Mobility and Volume through Treatment	□	◆	◆	◆	◆
Short-Term Effectiveness	N/A	◆	◆	◆	◆
Implementability	◆	❖	❖	◆	◆
Cost	$0	$7.74 million	$7.42 million	$6.09 million	$6.61 million
State Acceptance	To be evaluated after the public comment period				
Community Acceptance	To be evaluated after the public comment period				

◆ = Meets criterion ❖ = Partially meets criterion □ = Does not meet criterion

N/A = Not applicable * U.S. EPA recommended alternative

U.S. EPA is recommending thermal treatment for on-site soil using either ERH (Alternative 3A) or TCH (Alternative 3B).

Overall protection of human health and the environment

The "no action" alternative is not protective of human health or the environment. The remaining alternatives are protective of human health and the environment.

Compliance with ARARs

Alternatives 2A, 2B, 3A and 3B all comply with federal, state and tribal requirements known as *Applicable or Relevant and Appropriate Requirements*, or ARARs. Since nothing would be done with the "no action" alternative, ARARs would not apply.

Long-term effectiveness and permanence

Alternative 1 would not be effective in the long-term because it does nothing to reduce the contamination or potential exposure to the contamination. Alternatives 2A, 2B, 3A and 3B will reduce contaminant concentrations. However, Alternatives 3A and 3B are anticipated to reduce the concentrations by 95 percent or more. In addition, some removal of other site contaminants such as PAHs and PCBs will also occur through heating with Alternatives 3A and 3B making them more effective. The potential for leaching will be reduced for Alternatives 3A and 3B because the concentration of contaminants will be reduced to a great extent. While the potential for leaching will be reduced with Alternatives 2A and 2B, the long-term effectiveness of Alternatives 2A and 2B depends on the success of the soil mixing. If the contaminant concentrations are not sufficiently reduced, it may not fully eliminate the potential for soil contamination leaching into the groundwater. Furthermore, the biological treatment will add a significant amount of soil moisture, as well as volume, that will affect precipitation run-off. For Alternatives 2A, 2B, 3A, and 3B, the direct exposure route will be addressed with the 2-foot cover. The long-term effectiveness of thermal treatment remedies on VOCs is typically considered to be very high due to the high reduction in contaminants. U.S. EPA also evaluated the potential impact of climate change on the Beavercreek area.

Explanation of evaluation criteria

U.S. EPA compares each cleanup option or alternative with these nine criteria established by federal law:

1. Overall protection of human health and the environment examines whether an option protects living things. This standard can be met by reducing or removing pollution or by reducing exposure to it.

2. Compliance with applicable or relevant and appropriate requirements (ARARs) ensures options comply with federal, state and tribal laws.

3. Long-term effectiveness and permanence evaluates how well an option will work over the long-term, including how safely remaining contamination can be managed.

4. Reduction of toxicity, mobility or volume through treatment determines how well the option reduces the toxicity, movement and amount of pollution.

5. Short-term effectiveness compares how quickly an option can help the situation and how much risk exists while the option is under construction.

6. Implementability evaluates how feasible the option is and whether materials and services are available in the area.

7. Cost includes not only buildings, equipment, materials and labor but also the cost of maintaining the option for the life of the cleanup.

8. State acceptance determines whether the state environmental agency (in this case Ohio EPA) accepts an option. U.S. EPA evaluates this criterion after receiving public comments.

9. Community acceptance considers the opinions of nearby residents and other stakeholders about the proposed cleanup plan. U.S. EPA evaluates this standard after a public comment period.

Reduction of toxicity, mobility and volume through treatment

Alternative 1 would not reduce contamination in the soil since no treatment would be implemented. Alternatives 2A and 2B will reduce the contamination in the soil by approximately 57% to 98%. In addition, the mobility of the contaminants will be reduced by the soil treatment. However, there will be an approximately 55% increase in volume of the soil containing contaminants because of the soil treatment. Alternatives 3A and 3B are expected to result in 95% or more physical mass removal of the contaminants through the thermal treatment. In addition, the heating of the subsurface increases the breakdown of contaminants, which will result in a longer-term reduction in toxicity.

Short-term effectiveness

Short-term effectiveness is not relevant to Alternative 1 as no treatment is implemented. With Alternatives 2A and 2B the estimated timeframe to complete is approximately 12 months. Alternatives 2A and 2B have potential for short-term impacts to human health and the environment during construction and implementation. Construction workers may be exposed to contaminants during soil mixing and excavation activities. These risks could be addressed through dust control and proper use of personal protective equipment. While the treatment of Alternative 2A is completed entirely in-place, Alternative 2B requires some off-site disposal of impacted soils. This presents a potential short-term risk to the community from increased truck traffic. With Alternatives 3A and 3B, the estimated timeframe to complete is approximately 12 months and the impact to the surrounding community will be generally low during this period. While heat can potentially cause a short-term impact in increased leaching potential of contaminants to shallow groundwater, this will be addressed with a robust extraction system that will be part of the implementation.

Implementability

Alternative 1 poses no implementability issues as it requires no action to implement. Alternatives 2A and 2B have several design obstacles that need to be overcome before implementing this remedy successfully due to the increased volume of soil needed to be managed onsite as well as issues with the site grade changes. The adverse effect on grades and associated limitations on site reuse options were not anticipated in the 2011 cleanup decision. However, these impediments can be resolved during design. An obstacle for Alternative 3A is that all conductive materials must be removed prior to the start of treatment activities due to the potential for short circuiting. While this can be addressed in the design process and is rarely an ongoing concern, unidentified conductive materials can cause performance issues. An implementation challenge for Alternative 3B is the presence of saturated materials, such as the perched zone that exists on the south side of Little Beaver Creek. In these cases, cool perched water can limit successful heating of the zone. Challenges associated with heat loss in the higher permeability sands will be addressed during the design process. An additional challenge for Alternatives 3A and 3B is that the existing groundwater monitoring wells located within the treatment zone may need to be removed and replaced with monitoring wells that are constructed of materials that can withstand the high temperatures generated by the thermal treatment systems.

Cost, state acceptance and community acceptance

See the table on Page 6 for a cost comparison. EPA will evaluate acceptance by Ohio EPA and the community after the public comment period.

Summary of U.S. EPA's recommended alternative (Alternative 3) against the evaluation criteria

U.S. EPA believes the proposed change to the soil cleanup provides the best balance of tradeoffs among the alternatives. U.S. EPA expects the recommended change to be protective of human health and the environment; comply with ARARs; be cost-effective, use permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable; and satisfy the preference for treatment. It also provides long-term and permanent protection against exposure to site-related contaminants by the combination of soil treatment and land-use restrictions.

Public meeting

U.S. EPA will hold a public meeting to explain the proposed change to the soil cleanup plan. The presentation will be followed by an opportunity to ask questions about the cleanup as well as make an oral comment. Written comments can also be submitted at the meeting.

Date:	June 22
Time:	6 p.m.
Location:	Beavercreek City Council Chambers 1368 Research Park Drive Beavercreek

For more information

You may review site-related documents at:

Beavercreek Community Library
3618 Dayton Xenia Road
Beavercreek

Or on the web at:
www.epa.gov/superfund/lammers-barrel-factory

United States
Environmental Protection
Agency
Region 5
Community Involvement and
Outreach Section (RE-19J)
77 W. Jackson Blvd.
Chicago, IL 60604-3590

LAMMERS BARREL SUPERFUND SITE:
U.S. EPA Proposes Change to Soil Cleanup Plan

Public Comment Sheet

Use this space to write your comments

U.S. EPA is interested in your comments on the proposed change to the cleanup plan for contaminated soil at the Lammers Barrel Superfund site. You may use the space below to write, fold, stamp and mail your comments. Comments must be postmarked by July 15. If you have questions, contact Adrian Palomeque at 312-353-2035, or toll-free at 800-621-8431, Ext. 32035, 9 a.m. – 5:30 p.m., weekdays. Written comments may also be sent via the web at www.epa.gov/superfund/lammers-barrel-factory. Comments will also be accepted at the public meeting on June 22.

Name: ______________________

Affiliation: ______________________

Address: ______________________

City: ______________________

State: ____________ Zip: ________

Lammers Barrel Superfund Site – Comment Sheet

Fold on dashed lines, staple, stamp, and mail

Name ______________________________
Address ______________________________
City ______________________________
State ______________ Zip ________

Adrian Palomeque
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