IN THE MATTER OF:

Vogel Paint and Wax Company, Incorporated

TO: Vogel Paint and Wax Company, Inc.
c/o Franklin Vogel
615 S. Prairie Street
Orange City, IA 51041

Pursuant to Iowa Code sections 455B.175 and 455B.307, you are hereby notified that the Executive Director of the Iowa Department of Water, Air and Waste Management has determined that Vogel Paint and Wax Company is engaged in studies of the waste disposal site and is committed to full removal and/or treatment, and clean-up of contamination on and off the site. Consultants have determined that more time is necessary to accomplish this result, and the department concurs.

THEREFORE, administrative order 84-WW-09/84-LQ-03 is amended as follows:

1. Contaminant plume containment and removal.
   a. By August 7, 1984, Vogel Paint, through a knowledgeable and experienced consultant with expertise in the area of hydrogeology and underground waste
control and removal, shall conduct the necessary studies to adequately define relevant hydrogeological features in and around the waste disposal site, and the plume or plumes of contaminants migrating from said site, and shall submit to the department a plan of action for containment and removal of contaminant plume(s) by January 5, 1985. A final plan shall be submitted within 2 weeks after comments by the department.

   b. By November 5, 1984, Vogel Paint shall mobilize and begin implementation of the approved plan of containment and removal.

c. By January 5, 1985, Vogel Paint shall have completed implementation of the approved plan, and shall submit a final report of activities by February 18, 1985.

2. Total site security.

   a. By September 7, 1984, Vogel Paint, through a knowledgeable and experienced consultant with expertise in the area of hydrogeology and underground waste control and removal, shall conduct the necessary studies to evaluate options to effect total site security to prevent and rectify any movement of contaminants from the fill area, and shall submit to the department, a plan of action to accomplish this goal by May 15, 1985. A final plan shall be submitted within 2 weeks after comments by the department.

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b. By December 5, 1984, Vogel Paint shall mobilize and begin implementation of the approved plan of action for total site security.

c. By May 15, 1985, Vogel Paint shall fully implement the plan of action for total site security, subject to ongoing monitoring which may be required after such date. A closure report shall be submitted by July 20, 1985.

3. A progress report on all activities shall be submitted and received by the department by the 15th of each month until the final closure report is submitted. If any slippage in the time schedule is anticipated it shall be documented and requested in advance.

4. Quarterly monitoring for contamination shall continue now and after closure, until the department determines that the contamination has been adequately removed. Monitoring locations and constituents shall be at the direction of department staff, based on proposals of Vogel consultants. For now, existing and proposed monitoring locations shall be analyzed for total organic halogens, total organic carbon, methyl ethyl ketone, benzene, ethyl benzene, methyl isobutyl ketone, methylene chloride, n-butonal, iron, manganese, sodium, mercury, lead, zinc, chromium, chloride
sulfate, specific conductance, toluene, xylene, mineral spirits, phenol, and pH.

Stephen W. Ballou
Executive Director

6-27-84 Date