

February 21, 2025

Chad Stobbe, Environmental Specialist Senior
IDNR – Land Quality Bureau
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321



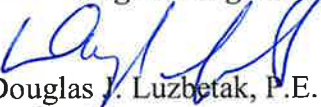
**RE: 2025 PERMIT RENEWAL
POWESHIEK COUNTY TRANSFER STATION
IDNR PERMIT NO. 79-SDP-04-92P XFR
HLW PN 6009-23A.310**

Dear Mr. Stobbe:

The IDNR SDP Permit for the Poweshiek County Transfer Station, IDNR Permit No. 79-SDP-04-92P-XFR, expires on July 18, 2025. On behalf of the South Central Iowa Solid Waste Agency (SCISWA), attached for your review and approval is an Executive Summary, IDNR Form 50B, and other documentation required for the permit renewal for the Transfer Station.

Please let me know if you have any questions.

Respectfully submitted,
HLW Engineering Group


Douglas J. Luzbetak, P.E.
Project Manager

cc: Rick Hurt, Executive Director, SCISWA (electronic copy)

ATTACHMENT A

EXECUTIVE SUMMARY

Summary of Modifications to the approved Plans and Specifications:

A completed IDNR Permit Application Form 50B is included in Attachment B.

General site mapping was included in the 2010 Permit Renewal Documentation (Doc #57497) and is still applicable.

Proof of Ownership was included in the 2010 Permit Renewal Documentation (Doc #57497) and is still applicable.

An Organizational Chart was included in the 2019 Permit Renewal Documentation (Doc #94764) and is still applicable.

Since the facility is permitted for less than 20,000 tons per year, operator certification is not required.

A current scale certificate is included in Attachment C.

A Site Design Plan was included in the 2010 Permit Renewal Documentation (Doc #57497) and is still applicable. Building schematics were also submitted in 1994 (Docs #12329-12335).

A Site Operation Plan was included in the 2022 Permit Renewal Documentation (Doc #102715) and is still applicable.

The Emergency Response and Remedial Action Plan (ERRAP) has been updated. The updated ERRAP is included in Attachment D.

A Closure Plan was included in the 2010 Permit Renewal Documentation (Doc #57497) and is still applicable.

The updated Closure Cost Estimate for the Transfer Station is \$39,369. The balance of the restricted funds for Transfer Station Closure was \$41,422.06 as of December 31, 2024. The Closure Cost Estimate certified by an Iowa licensed Professional Engineer and the fund balance statement are included in Attachment E. The amount reserved for closure of the Transfer Station is greater than the estimated closure cost of the Transfer Station so financial assurance requirements are satisfied.

Summary of each Special Provision of the existing SDP Permit:

1. The Transfer Station participates in the South Central Iowa Solid Waste Agency (SCISWA) Comprehensive Plan. The most recent update of the Comprehensive Plan was approved by IDNR on December 3, 2015. SCISWA is enrolled in the Iowa Solid Waste Management System Environmental Management System program. The permitted service area of the Transfer Station should be revised to match that of the SCISWA Landfill:

**Poweshiek County Transfer Station
2025 SDP Permit Renewal
Executive Summary
Permit No. 79-SDP-04-92P-XFR**

All cities and the unincorporated area in Lucas County; all cities and the unincorporated area in Marion County; all cities and the unincorporated area in Monroe County; all cities and the unincorporated area in Poweshiek County; and the City of Victor in Iowa County.

2. The Site Operation Plan (2022 Permit Renewal Documentation - Doc #102715) and Closure Plan (2010 Permit Renewal Documentation - Doc #57497) are still applicable. An updated Emergency Response and Remedial Action Plan is included as Attachment D of this Permit Renewal Documentation.

Summary of each Permit Amendment:

No amendments to the current SDP Permit have been issued.

Summary of new Permit Amendment Requests:

None at this time.

Summary of Equivalency Review Requests:

None at this time.

Summary of new Variance Requests:

None at this time.

ATTACHMENT B



IOWA DEPARTMENT OF NATURAL RESOURCES
SOLID WASTE TRANSFER STATION
PERMIT APPLICATION FORM 50B



New Permit
 Permit Renewal (permit number) 79 -SDP- 04 -92P XFR

SECTION 1. FACILITY CONTACT INFORMATION

Facility

Name: SCISWA - POWESHIEK COUNTY TRANSFER STATION Phone: 641-528-2801
 Address: 1163 HIGHWAY 6 City, State, Zip: MALCOM, IA 50157
 County: POWESHIEK

Responsible Official for the Facility

Name: RICK HURT Phone: 641-828-8545
 Address: 1736 HIGHWAY T-17 Fax: 641-842-3722
 City, State, Zip: TRACY, IA 50256 E-mail: RHURT@SCISWA.ORG

Owner of Site

Name: SOUTH CENTRAL IOWA SOLID WASTE AGENCY Phone: 641-828-8545
 Address: 1736 HIGHWAY T-17 Fax: 641-842-3722
 City, State, Zip: TRACY, IA 50256 E-mail: RHURT@SCISWA.ORG

Facility Operator

Name: SAME AS FACILITY OWNER Phone: _____
 Address: _____ Fax: _____
 City, State, Zip: _____ E-mail: _____

Financial Assurance Engineer

Name: DOUG LUZBETAK - HLW ENGINEERING Phone: 515-733-4144
 Address: 204 WEST BROAD STREET Fax: 515-733-4146
 City, State, Zip: STORY CITY, IA 50248 E-mail: DLUZBETAK@HLWENGINEERING.COM
 Iowa Engineer License #: 12654 Expiration Date: 12/31/2026

SECTION 2. SITE INFORMATION

This facility is part of the following solid waste comprehensive planning area:
 Planning Area: SO CENTRAL IA SOLID WASTE AGENCY (SCISWA) Date of Last Approved Plan: 12/03/2015 (EMS EXPT)

This facility does not participate in a planning area within the state of Iowa other than its own.
 *A solid waste comprehensive plan must be developed and approved by the department prior to issuance of a sanitary disposal project permit. Please contact the department's Solid Waste Comprehensive Planning staff at (515) 725-8319 for instructions and requirements for completing a comprehensive plan.

Days and hours of operation of the facility: MON-FRI 7:30AM-3:30PM; SAT 8:00AM-11:30AM; SUN CLOSED

Open to the public? Yes No

Service area of the facility and final disposal destination (include unincorporated areas and out of state cities):

Service Area: ALL CITIES AND UNINCORP AREAS OF MARION, MONROE, LUCAS, AND POWESHIEK COUNTIES AND VICTOR, IA
 Disposal Facility: SOUTH CENTRAL IOWA SOLID WASTE AGENCY LANDFILL IN MARION COUNTY IOWA

Type, source and expected weight (tons) of solid waste to be handled per day, week and year at the facility:

per day MSW & SMALL AMOUNTS OF C & D FROM RES., COM., & IND. CUSTOMERS UP TO 70 TONS PER DAY

per week MSW & SMALL AMOUNTS OF C & D FROM RES., COM., & IND. CUSTOMERS UP TO 375 TONS PER WEEK

per year MSW & SMALL AMOUNTS OF C & D FROM RES., COM., & IND. CUSTOMERS UP TO 19,500 TONS PER YEAR

Description of the waste handling process to be used (e.g., *individuals unload trash into one of 3 roll-offs on site. Roll-offs are removed when full and replaced with empties.*):

WASTE IS UNLOADED ONTO TIPPING FLOOR AND PUSHED INTO TRAILERS FOR TRANSPORT TO SCISWA LANDFILL IN MARION COUNTY

Check all other materials accepted/activities at the facility:

Recyclables drop-off - glass, paper, plastic, metal

Scrap Metal Salvaging

Lead Acid Batteries

Appliance Demanufacturing

Used Oil

Electronics Demanufacturing

Antifreeze

Yard Waste Composting

White Goods Collection

Yard Waste Collection

Tires

HHM/RCC

Electronics Collection (including Cathode Ray Tubes)

Other BROWN GOODS

SECTION 3. PERMIT APPLICATION CHECKLIST

Checking the appropriate boxes below certifies that the documents submitted in conjunction with this application form are complete and in compliance with the applicable chapters of the Iowa Administrative Code. While some of the documents below may have been submitted previously, updated copies of each is required to be provided with each permit renewal application, unless a prior document remains current and is identified by Doc ID # below. If an application is found by the department to be incomplete, it may be denied and returned to the applicant.

Required Documents

Section A. Executive Summary (permit renewals only)

- Summary of modifications, if any, to the facility that occurred during the current permit cycle.
- Summary of each special provision of the current permit to determine if it is to remain the same, be revised or be removed.
- Summary of each permit amendment, if any, that occurred during the current permit cycle to determine if it shall be included with the renewed permit, be revised or be removed.
- Provide documentation and certification as required for new permit amendment requests and new waiver requests from Iowa Administrative Code, if any.

Section B. Site Map or Aerial Photograph (IAC 567 106.8(1)“c”)

No Revision Required - See Doc ID#: 57497

Section C. Proof of Ownership/Local Zoning Requirements (IAC 567 106.8(1)“d”)

No Revision Required - See Doc ID#: 57497

Section D. Organizational Chart (IAC 567 106.8(1)“i”)

No Revision Required - See Doc ID#: 94764

Section E. Operator Certification (if permitted for 20,000 tons or more per year) (IAC 567 106.11(1)“d”)

No Revision Required - See Doc ID#: N/A

Section F. IDALS Scale Certificate (IAC 567 106.10(2)“b”)

Section G. Site Design Plan (IAC 567 106.8(1)“j”)

No Revision Required - See Doc ID#: 57497 & 12329-12335

Section H. Site Operation Plan (IAC 567 106.8(1)“k”)

No Revision Required - See Doc ID#: 102715

Section I. Emergency Response and Remedial Action Plan (IAC 567 106.8(1)“m”)

No Revision Required - See Doc ID#: _____

Section J. Site Closure Plan (IAC 567 106.8(1)“l”)

No Revision Required - See Doc ID#: 57497

Section K. Proof of Financial Assurance (IAC 567 106.18)

SECTION 4. APPLICANT CERTIFICATION

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I further certify that the construction and operation of the above described facility will be in accordance with the plans, specifications, reports and related communications accepted by the Iowa Department of Natural Resources and on file in its office; and in accordance with conditions imposed in the permit issued by the Iowa Department of Natural Resources.

Signature of Permit Applicant: _____



Date: FEBRUARY 21, 2025

Printed Name: RICK HURT

Title: EXECUTIVE DIRECTOR

Application for a solid waste transfer station must be accompanied by the plans, specifications and additional information required by the applicable solid waste rules under Iowa Administrative Code 567 Chapter 106.

Send completed application with attached information to:

Iowa Department of Natural Resources
Land Quality Bureau
Solid Waste Section
502 E 9th St
Des Moines, IA 50319-0034

For questions concerning this application please contact the Department at (515) 201-8272.

ATTACHMENT C

POST IN CONSPICUOUS PLACE

NONTRANSFERABLE

STATE OF IOWA
DEPARTMENT OF AGRICULTURE & LAND STEWARDSHIP

DES MOINES

SCALE LICENSE

License No. 7500

SOUTH CENTRAL IA SOLID WASTE
1736 HIGHWAY T17
TRACY IA 50256

SCALE LOCATION

POWESHIEK CO TRANS STATION
1163 HIGHWAY 6
MALCOM IA 50157

IS GRANTED THE ABOVE LICENSE PURSUANT TO SECTIONS 214, CODE OF IOWA. THIS LICENSE SHALL REMAIN IN FULL FORCE FROM THE DATE OF ISSUE UNTIL ITS EXPIRATION DATE, UNLESS REVOKED OR SUSPENDED FOR CAUSE BY THE SECRETARY OF AGRICULTURE FOR NONCOMPLIANCE WITH CHAPTER 214, CODE OF IOWA OR RULES ADOPTED PURSUANT THERETO.

DATE OF ISSUE 10/30/2024

TYPE OF DEVICE --- NUMBER

EXPIRATION DATE
12/31/2025

0 THRU 500 LBS	0
501 THRU 5000 LBS	0
5001 THRU 50000 LBS	0
50001 THRU 120000 LBS	1
OVER 120000 LBS	0
MOISTURE METERS	0
COUNTY	79

This license is non-transferable and non-refundable



SECRETARY OF AGRICULTURE

ATTACHMENT D

Emergency Response and Remedial Action Plan



Poweshiek Transfer Station

1163 Highway 6

Malcom, Iowa 50157

641-528-2801 (phone)

www.sciswa.org

Permit #: 79-SDP-04-92P XFR



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Serving Lucas, Marion, Monroe and Poweshiek Counties

Office & Landfill: 1736 Highway T17 ▪ Tracy, Iowa 50256 ▪ Tel: 641-828-8545 ▪ Fax: 641-842-3722

Poweshiek Transfer Station: 1163 Highway 6 ▪ Malcom, Iowa 50157 ▪ Tel: 641-528-2801

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Attachments

- A. Site Plan/Emergency Assembly Point
- B. Inclement Weather Policy
- C. Emergency Contacts
- D. Nearby Hospitals and Medical Facilities/ Directions from Transfer Station
- E. Iowa Department of Natural Resources (IDNR) Guidelines for Hazardous Reporting
- F. Media Contacts
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R. Hurt, Director

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106.19 Poweshiek Transfer Station Emergency Response & Remedial Action Plans

I. Facility information

A. Permitted Agency

South Central Iowa Solid Waste Agency (Agency) is the 28E agency that owns and operates the Poweshiek Transfer Station.

B. DNR Permit Number

The Poweshiek Transfer Station operates under DNR Permit # 79-SDP-04-92P XFR.

C. Facility Description

The Poweshiek Transfer Station sits on 8 acres adjacent to U.S. Highway 6 and U.S. Highway 63 north of Malcom, Iowa. The legal description is SE ¼ of Section 11, T80N, R15W, Poweshiek County, Iowa. The street address is 1163 Hwy 6, Malcom, Iowa 50157.

The Transfer Station site is fenced. It houses a scale house, a small storage shed for waste oil, storage boxes for waste tire and electronics recovery, and a large building for the transfer of solid waste. As of early 2012, Transfer Station is also a satellite drop-off facility for household hazardous wastes (HHW) and hazardous wastes from conditionally exempt small quantity generators.

The Poweshiek Transfer Station serves the residents of Poweshiek County and is open Monday through Friday, 7:30 a.m. to 3:30 p.m., and Saturday 8 a.m. to 11:30 a.m. The Transfer Station is permitted to handle 19,500 tons of solid waste per year. Annual deliveries have historically been less than this permit limit.

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www.sciswa.org

D. Responsible Official & Contact Information

Rick Hurt, Director
 South Central Iowa Solid Waste Agency
 1736 Highway T-17
 Tracy, Iowa 50256
 Office phone (641) 828-8545 Cell phone (641) 871-0201
 Fax (641) 842-3722
 E-mail: rhurt@sciswa.org

Contact information for Agency Senior Staff is listed in Table 1.

**Table 1
 Agency Senior Staff Contact Information**

Name	Location	Number
Agency Offices (primary)	Office	(641) 828-8545
	Shop	(641) 828-8505
Darrah, Dustin- Operator	Cell	(641) 990-1241
Dean, Daedrian – Scale Operator	Cell	(641) 990-6602
Dunsmoor, Tony – Operator	Cell	(641) 990-8711
Hurt, Rick - Director	Cell	(641) 871-0201
Jack, Scott -- Operator	Cell	(641) 990-1214
Maschmann, Partner – Lead Operator	Cell	(641) 990-5163
McCammant, Dale -- Operator	Cell	(641) 521-4593
McVey, Rita – Scale Operator	Cell	(641) 275-2793
Murphy, Jennifer – Program Coor.	Cell	(641) 216-3106
Sedlock, Leslie – Business Manager	Cell	(641) 891-3368

E. Site & Environs Map

An aerial photo of the site and site map are included at the end of this report. This is included as *ATTACHMENT A*.

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II. Regulatory Requirements

A. Iowa Code

The purpose of the ERRAP is to meet the requirements established in Iowa Code Section 455B.306(6) "d:"

"An emergency response and remedial action plan including established provisions to minimize the possibility of fire, explosion, or any release into the air, land or water of pollutants that could threaten human health and the environment, the identification of possible occurrences that may endanger human health and environment."

The ERRAP will be updated as required by this Chapter and the requirements of Iowa Administrative Code 567—106.19(455B).

B. Permit Provisions

An updated ERRAP will be submitted at the time of each permit renewal application if a review indicates that revisions are needed. The ERRAP is intended to be flexible and will also be revised as operations or facilities change.

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Poweshiek Transfer Station: 1163 Highway 6 ▪ Malcom, Iowa 50157 ▪ Tel: 641-528-2801

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III. Emergency Conditions, Response Activities, Remedial Action

A. Failure of Utilities

(1) Liquid Propane (LP)

There are two (2) LP tanks on site that are used for heating the Scale House and Transfer Station building. They are located:

1. Adjacent to the Scale House on the north side of the building.
2. Adjacent to the Transfer Station building on the east side of the building.

a) LP Supply Failure – Short Term & Long Term

In the event that Transfer Station facilities are without propane supply and propane odor is not present contact the Agency Director: Rick Hurt, 641-828-8545; cell phone: 641-871-0201.

b) Propane Leak – Actions to Take

1. Try to shut off the propane by turning the shut-off valve on the tank.
 - Do not attempt to locate gas leaks. Open doors and windows.
 - Do not turn lights on or off or unplug electrical appliances.
 - Do not use telephones in or around the building or office.
 - Do not attempt any other repairs to the gas systems.
2. Leave the building where the odor is identified. Go to the Emergency Assembly Point outside the front gate. Account for landfill personnel, guests, contractors, etc.
3. Using a cell phone contact the Liquid Propane Company: Key Cooperative, 800-469-1040.
4. Notify Agency Director: Rick Hurt, 641-828-8545; cell phone: 641-871-0201.

(2) Electricity Failure

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a) Short Term (48 hours or less)

The Poweshiek Transfer Station has been equipped with a 30 kW Kohler diesel generator to provide power in the event of an electrical failure. The generator is wired directly into the scale house and transfer building and starts automatically in the event of a power failure. This ensures the continued operation of scale, lights in the scale house and transfer building, and the overhead doors providing building access.

During the day if the weather is good, the draw on the generator will be lessened by leaving overhead doors open and using natural light to replace or supplement the interior lights.

The generator will remain in use until electricity is restored.

Diesel fuel is available from the Poweshiek County Malcom Shop located immediately west of the Poweshiek Transfer Station.

b) Long Term (over 48 hours)

If the electrical outage is projected to continue longer than two working days (or more than 48 hours), staff will continue to use the emergency generator and bring operations back to near-normal as quickly as possible.

(3) Water Failure

a) Short Term (48 hours or less)

The Transfer Station is supplied with water for an emergency shower and portable power washer. Additionally, the scale house is supplied with potable water and a shower. A short-term outage would be an inconvenience but the Transfer Station would be able to continue operations. Operators will bring their own potable water as needed. Staff will arrange for a tank of water to be held on site during the outage so that toilets may be flushed and other minor needs addressed.

a) Long Term (over 48 hours)

Water is needed to wash the Transfer Station walls and floor on a weekly basis. If water is unavailable from an on-site supply when this cleaning is to be completed, an area fire department or other local carrier will be contacted to deliver water or Agency staff will arrange to haul a tanker-load of water to the Transfer Station for use during the outage.

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www.sciswa.org

(4) Telephone Service

a) Short-Term (48 hours or less)

Transfer Station operations will continue. Operators will stay in contact with the Agency and other off-site entities via cellular phones or radio until land-based service can be restored. The ability to transfer data from the Transfer Station accounting system to the Agency accounting system via modem will be lost until telephone service is restored. However, the data can be stored within the Transfer Station computer system until that time.

b) Long-Term (over 48 hours)

Transfer Station operations will continue. Operators will stay in contact with the Agency and other off-site entities via cellular phone or radio until service can be restored. Scale records will be transferred electronically each night to a computer at the Agency Landfill. Because site security and the fire detection system is linked to service contractor via telephone, the contractor and local fire and law enforcement officials will also be notified of the outage.

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B. Weather-Related Events

The Agency has adopted an Inclement Weather Policy that provides guidance to staff regarding weather-related events during which the Director may close Agency facilities. This is included as *ATTACHMENT B*. The haulers to be contacted in the event of a decision to close the Transfer Station for inclement weather are listed in *ATTACHMENT C*, as well as additional Emergency Management numbers.

(1) Tornado

First and foremost, Agency staff will protect the health and safety of themselves and all customers on site.

In the event a tornado warning is issued or an actual tornado sighted, employees will direct all customers to the lowest level of the transfer station for shelter. After determining all customers have been notified, employees will place a sign in the window of the scale house identifying the shelter location and themselves seek shelter in this location.

After the warning has been lifted or threat of additional damage and injury has passed, employees will contact medical assistance as needed. Those able to do so will then inspect the site for damage requiring immediate attention (fire, flooding, downed power lines) and contact 1) the appropriate emergency response teams and 2) a member of the Agency's senior staff.

(2) Windstorms

Depending on the severity of the winds, responses by Transfer Station staff may range from closing all Transfer Station doors except as needed for temporary staff or customer access to the major step of temporarily suspending operations. In the event of a major windstorm, staff and customers will seek appropriate shelter until the storm has passed.

After the warning has been lifted or threat of additional damage and injury has passed, employees will contact medical assistance as needed. Those able to do so will then inspect the site for damage requiring immediate attention (fire, flooding, downed power lines) and contact 1) the appropriate emergency response teams and 2) a member of the Agency's senior staff or, in their absence, a Board member.

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(3) Intense Rainstorms & Erosion

Heavy rains will have little effect on the operations of the Transfer Station as all waste unloading and loading occurs indoors. However, it may affect the ability of employees to safely pull loads to the Landfill. This may require checking with the Iowa DOT or local law enforcement officials to determine if the normal route between the Transfer Station and Landfill remains open.

If in route between facilities, driver/operators will use good judgment in determining when heavy rain has impacted visibility and/or road conditions to an extent that they cannot safely proceed. Driver/operators will park and wait until conditions have improved before continuing. If at all possible they should use a cell phone or radio to make either the Transfer Station or Landfill aware of their decision.

Some areas of the Poweshiek Transfer Station may be vulnerable to erosion. These include:

- The north-facing slope on the west side of the Transfer Station
- A channel across the driveway to the white goods and scrap metal areas

Staff will monitor these areas for erosion caused by any rain event and make repairs as needed.

(4) Icy Roads

Icy roads will affect Transfer Station operations, the ability of customers to reach the Transfer Station, and the ability of employees to safely pull loads to the Landfill. The Director will follow the Agency's Inclement Weather Policy to determine whether the facility should close. If the facility remains open, loads will be pulled only as absolutely necessary until road conditions improve. Waste can and will be held within the Transfer Station for up to 48 hours, in the event of extended poor road conditions.

When a load must be pulled over icy roads, driver/operators will use good judgment in proceeding. If road conditions deteriorate while traveling to/from Agency facilities, driver/operators will park and wait until conditions have improved before continuing. If at all possible they should use a cell phone or radio to make either the Transfer Station or Landfill aware of their decision.

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(5) Lightning Strikes

If lightning hits the Transfer Station site, it is most likely to cause a fire and/or disrupt electrical service up to and including knocking out the scale and computer systems.

After threat of additional damage and injury has passed, employees will first contact medical assistance and emergency services as needed, then a member of the Agency's senior staff or, in their absence, a Board member.

For the duration of an electrical outage, the Transfer Station will follow the procedures listed above for failure of utilities – electrical.

If the scale system and/or computer have been damaged by a lightning strike, contact the Agency Business Manager immediately for short term assistance. If the scale monitor is working but the computer is no, manually record incoming and outgoing weights and calculate fees accordingly. If the scale monitor is not functional, staff will estimate charges based on vehicle and load size using the Agency's guidelines for estimating load weights and charges.

(6) Flooding

The Poweshiek Transfer Station is located high above any drainage ditch or creek. The closest river is more than 15 miles to the southwest so flooding is very unlikely. However, if the site were to experience flooding as a result of intense rain, the Transfer Station will be closed until access can be re-established and the site and buildings inspected for structural soundness.

Employees present on-site at the time of the flooding incident will as soon as possible notify 1) appropriate emergency response teams and 2) a member of the Agency's senior staff or, in their absence, a Board member.

If driver/operators encounter flooded areas on a trip between Agency facilities, they will re-route to a safer, passable road and notify either the Transfer Station or the Landfill of this change.

(7) Event & Post-Event Conditions

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A complete assessment of damages to the facility will be completed within 48 hours of the incident. The Agency will determine and implement appropriate steps to ensure proper waste handling and disposal for waste typically handled via the Transfer Station.

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C. Fire & Explosions

Notifications- Fires/Explosions

Fire Department: 911

Agency Director: Rick Hurt, 641-828-8545; cell 641-871-0201

Any other emergency contacts as needed found in *ATTACHMENT C*.

Basic Fire Safety

- Check that maintenance has been done for fire extinguishers, smoke detectors, etc.
- Avoid using extension cords whenever possible, especially small-wired cords used with high-wattage appliances. Extension cords should not be run under rugs or hooked over nails.
- If a fuse blows (or breaker trips), find the cause. Remove excess appliances (lamps, stereo components, space heaters, etc.) for a breaker circuit that frequently “trips.”

(1) Waste Materials Fires

The Poweshiek Transfer Station does not accept explosives and checks loads for compliance. A fire or explosion as a result of these materials is very unlikely. Burning municipal solid waste and hot loads are prohibited from delivery. In the event that something is accepted, it will be segregated in the area designated for hot load tipping and a determination made as to whether operators can safely suppress the fire or require assistance from an area fire department.

(2) Buildings & Site Fires

The Poweshiek Transfer Station scale house and transfer building are linked via a fire/heat detection system to A-Tech, Inc. and from there to Poweshiek County’s emergency services dispatch. If an incident is noted during non-working hours, emergency services will be alerted and can contact necessary responders. If during the day an incident occurs, staff will contact emergency services by calling 911.

(3) Household Hazardous Materials Building & Area Fires

The satellite hazardous waste storage building has a 2-hour fire rating and is equipped with a dry chemical fire suppression system. SCISWA personnel are not trained as hazardous material responders. Should fire suppression systems be activated, employees are directed to contact emergency services by calling 911, establish a 300’

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perimeter around the storage building and deny entry to anyone other than emergency responders.

(4) Equipment Fires

Loaded transfer trailers are not to be stored inside the Transfer Station, except potentially during the coldest days of the winter. This is part of a plan to minimize the potential for fire in the transfer equipment to affect buildings. If a trailer were to burn outside, emergency services will be contacted for fire containment. The Agency operates four trailers and can continue hauling with those or with one or more contracted units in the event of damage as a result of fires or explosions.

Similarly, arrangements have been made to access other equipment (semi-tractors, loaders) that may be needed to continue operations after an on-site fire or explosion.

(5) Fuel Fires

Diesel fuel storage is located behind the transfer station building. In the event of fire, if possible turn off the pump or the nozzle distributing flammable liquid. Evacuate area of all customers and unnecessary personnel. Stay well clear of the fuel storage tank in case of explosion and go to the Emergency Assembly Point.

Two 1,000 gallon LP tanks sit east of the Transfer Station. They are away from haul roads and buildings and should vent into the open air if breached.

(6) Utilities Fires

Liquid Propane Tank

Evacuate the area immediately. Go to the Emergency Assembly Point outside the front gate, making sure it is a safe distance away. Use a cellular phone to call the Fire Department: 911, and notify Agency Director: Rick Hurt, 641-828-8545; cell: 641-871-0201. Caution: Exploding tanks may eject pieces of the tank several hundred feet. These pieces can be lethal.

Electrical

Electricity enters from the south off a pole on the west side of the scale/driveway. Buried electrical lines run to the scale house and Transfer Station. There is no electrical service to the used oil storage shed or satellite HHW facilities.

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Water

The scale house and Transfer Station are served by rural water, which enters through a main running along the south side of the property.

Telephone

Telephone cable exits a pedestal on the south edge of the property, west of the driveway. From that location it runs underground to the scale office and the Transfer Station.

(7) Facilities Fires

Restrooms and a shower room are located in the scale house. An emergency shower and eye wash station are located on the west wall of the Transfer Station.

(8) Working Area Fires

The Transfer Station tipping floor is the primary working area. Burning loads and loads found to contain hot or prohibited materials are tipped outside the building and segregated until emergency services can be contacted.

The Transfer Station and the scale house are equipped with fire extinguishers for addressing minor fires. However, employees are instructed to prioritize personal and customer safety over combating a fire.

(9) Hot Loads

The Poweshiek Transfer Station does not knowingly handle hot loads; however, if found, they are segregated outside the building until extinguished.

(10) Waste Gases

The Poweshiek Transfer Station does not accept waste gases except spent propane tanks. These are stored outside and collected for processing by the white goods contractor.

(11) Evacuation Procedures

Employees will ensure that all customers leave dangerous areas, then themselves leave those areas. Individuals on-site at the time of a fire or explosion will gather:

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- In the scale house if the event is in the Transfer Station
- Outside the front gate beside the Transfer Station sign if the event is in the scale house

D. Regulated Waste Spills & Releases

Regulated materials are those banned from land disposal or whose disposal is regulated by Federal or State rules or laws. Regulated materials do not include those considered to be hazardous under the Federal EPA Resource Conservation and Recovery Act. Regulated materials could include, but not limited to, waste oil, fuels, refrigerants, agricultural chemicals, etc.

See *ATTACHMENT C* for Emergency Management numbers.

(1) Waste Materials Spills/Releases

Transfer Station staff will inspect all incoming loads. Upon observing regulated materials, staff will immediately:

- Identify the waste hauler – driver name, company name, vehicle number or license plate. Contact the scale house to record needed information on the appropriate scale ticket, thus also retaining the time the load arrived on site, the time the vehicle spent on-site, and the net weight of the delivery.
- Determine, if possible, the type, name, or nature of the waste. Work with the hauler/driver/transporter to identify the generator, if different. Note the color, odor, and quantity of material.
- If possible, segregate the material from other waste in the Transfer Building.
- Contact the scale house to hold other customers away from the Transfer Building until the situation can be resolved. If needed, ask them to return at a later time.
- If the waste has an odor or is identified to be explosive, immediately evacuate all customers and employees from the Transfer Station and call 911 to activate trained responders.
- Eliminate ignition sources, including lights and vehicles with their engines running. Shut down electrical power in the building if necessary.

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- If the waste is a liquid and does not pose threat through explosion, ignition, or inhalation, place berms or absorbent material around the waste to contain it. If necessary, use a drier waste as an absorbent material but keeping contaminated waste separate from uncontaminated waste.
- Contact the Director
- Contact DNR Field Office #5 to report the spill
- After receiving authorization from the Director, DNR field office or other trained responders move the spilled material and any other contaminated waste into a temporary storage container or segregated outdoor holding area.
- All contaminated waste will also be handled as a regulated waste.
- If needed to determine the nature of the waste, contact a chemist or HAZMAT responder to assist in the identification and procedures for the clean-up.
- Take photos of the waste and the site to document conditions for the insurance companies or for litigation purposes if required

(2) Wash Water

- Transfer Station wash water is collected in a holding tank, which is pumped into an Agency tanker and delivered to the Des Moines Metropolitan Wastewater Reclamation Facility for treatment.
- If wash water is spilled on the ground during loading, use dirt or other absorbent material to absorb the spill.
- Contact the Director and DNR Field Office #5 to notify them of the spill.
- With approval of the field office, use the loader to excavate the contaminated soil and work with the Poweshiek County Engineer or Agency equipment to haul the contaminated soil to the Landfill for additional treatment.
- Any contaminated absorbents must be handled as regulated waste.

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- Record the time, date, operator, and approximate quantity of the spill on the Daily Record.
- Take photos of the waste and the site to document conditions for the insurance companies or for litigation purposes if required.

(3) Waste Gases Releases

- The Transfer Station holds waste for a minimal amount of time prior to transferring it to the Landfill, thus preventing the production of waste gases.
- The Transfer Station is one of the routine quarterly points for gas monitoring at the adjacent, closed Poweshiek County Landfill.

(4) Waste Storage Facilities Spills

Spills from municipal solid waste loads being received at the site will be collected by operators and moved into the Transfer Station.

Recycling areas will be kept organized in their designated areas. Operators will straighten and tidy these areas as part of their daily work routine.

(5) Waste Transport Systems Spills/Releases

Waste collected at the Poweshiek Transfer Station is hauled to the Agency’s Landfill in eastern Marion County.

If a driver/operator spills or discharges waste from the transfer trailer during a trip to the Landfill, he/she will immediately stop and notify the Director. The transfer vehicle will not move until all waste has been removed from the roadway and/or arrangements made for it to be collected and loaded onto a vehicle that will deliver it to the Landfill or Transfer Station, whichever is closer. Collection and delivery of the spilled waste may happen in a vehicle other than the trailer from which the waste was spilled.

The driver/operator shall notify the sheriff of the county in which the spill occurred with the details of the incident, to ask for traffic assistance as needed, and to provide plans for removing the spilled waste:

- Poweshiek County Sheriff(641) 623-5679
- Mahaska County Sheriff(641) 673-4322

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- Marion County Sheriff.....(641) 828-2220

The Director will notify the Department at (515) 725-8694 and DNR Field Office #5 at (515) 725-0268 with the details of the incident and to provide plans for removing the spilled waste.

(6) Litter & Airborne Particles

Control of litter and dust are ongoing activities at the Transfer Station. Litter is controlled by:

- The Agency’s tarping policy, which requires incoming loads to be tarped and secured
- Dumping loads inside the Transfer Station, where it is more protected from wind
- Regular litter-picking by staff

Airborne particles (dust) are controlled by:

- Watering or treating the on-site access road during dry weather
- Routine maintenance in the Transfer Station

(7) Site Drainage Systems Spills/Releases

Spills will be handled as described above under item 4 (2) Wash Water.

(8) Off-Site Releases

Off-site releases of waste during transport will be handled as described above under (4)5 Waste Transport Systems.

If an Agency vehicle has a fuel release while in transit, the driver shall immediately notify law enforcement or emergency response officials with jurisdiction for that location and follow their directions for response. The driver’s second call will be to the Agency Director.

If an off-site release by another party affects the ability of customers to access the Transfer Station for more than two working hours, the Agency will use the Emergency Contact List (Attachment C) to notify major customers and the media of the delay. Those customers that must dump within the period without access will be re-directed to the Agency Landfill.

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If the lack of access appears likely to continue past the end of one working day, staff will work with local law enforcement and emergency response officials to designate a safe, alternate access route to the Transfer Station. If this is not possible, customers will continue to be directed straight to the Agency Landfill. Agency staff assigned to the Landfill, led by the Director, will adjust operating hours and accounting procedures as needed to accommodate the emergency traffic.

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E. Hazardous Material Spills & Releases

Hazardous materials are those regulated by federal law (RCRA, SARA, CERCLA) and generally include:

- Explosive, flammable, corrosives, oxidizing, toxic, infectious, and radioactive materials and wastes
- Materials/wastes that may place the public in immediate danger due to exposure, contact, inhalation, or ingestion

(1) General Cautions- Hazardous Spills/Releases

- See *ATTACHMENT E* for State Guidelines for Reporting Hazardous Conditions.
- Do not smoke. Do not create sparks.
- Be aware of the wind and avoid inhaling hazardous materials.
- Use caution operating near hazardous materials. The material should be considered hazardous even if the suspected material has not yet been confirmed hazardous by a professional.
- Do not let people or equipment make contact with liquids, dusts or fumes of hazardous materials.
- Only trained professionals should attempt to clean up the hazardous materials.
- Do not come into contact with the hazardous material.
- Some hazardous materials can react violently with other chemicals and other materials- use extreme caution.

In the event of a hazardous materials spill/release, assess the type and amount of spilled materials to determine if outside assistance is required. If assistance is needed, evacuate area of all personnel and customers.

If assistance is not needed, shut off all ignition sources and ventilate the area. Stop the flow of material: If possible, correct the situation- e.g., close the valve, set container upright, plug the leak, etc. To contain the spill, using proper equipment (i.e., respirator, *Hazardous Materials Spills & Releases, continued*

plastic shovel, broom), clean up the spill. Place the waste in a plastic bag and pack in proper waste stream. Equipment needed to clean up the spill is located in the building

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or in the storage building located adjacent to the building. Keys to the building are located at the Scale House.

Contact the Agency Director: Rick Hurt: 641-828-8545; cell: 641-871-0201. In the event of a major spill, call Haz Mat – 911. See *ATTACHMENT C* for additional Emergency Management numbers.

(2) Hazardous Materials in Loads

Transfer Station staff will inspect all incoming loads. Upon observing hazardous materials mixed with municipal solid waste, staff will immediately:

- Determine, if possible, the type, name, or nature of the waste. Work with the hauler/driver/transporter to identify the generator, if different. Note the color, odor, and quantity of material.
- If the hazardous material is containerized and can be safely segregated and handled, staff should follow the procedures outlined in the Satellites Operations Plan.
- If the hazardous material is not containerized or is in a leaking or compromised container, staff will remain upwind from and out of contact with the material at all times.
- If possible without placing the operator in jeopardy, use the loader to segregate the material from other waste in the Transfer Building.
- Contact the scale house to hold other customers away from the Transfer Building until the situation can be resolved. If needed, ask them to return at a later time.
- If the waste is identified as flammable, toxic, volatile, or explosive, or is in a leaking or compromised container (dented, punctured, bulging) marked as such, immediately evacuate all customers and other employees from the Transfer Station and call 911 to activate trained responders.

Hazardous Materials in Loads, continued

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- If the waste is a liquid, place berms or absorbent material around the waste to contain it. If necessary, use a drier waste as an absorbent material but keep contaminated waste separate from uncontaminated waste.
- Eliminate ignition sources, including lights and vehicles with their engines running. Shut down electrical power in the building if necessary.
- Evacuate any remaining employees from the building and wait for emergency responders to arrive.
- While outside the Transfer Station, identify the waste hauler – driver name, company name, vehicle number or license plate. Contact the scale house to record needed information on the appropriate scale ticket, thus also retaining the time the load arrived on site, the time the vehicle spent on-site, and the net weight of the delivery.
- Contact the Director
- See *ATTACHMENT E* for State Guidelines for Reporting Hazardous Conditions.
- All contaminated waste will also be handled as a hazardous waste. Removal of hazardous wastes and clean-up of the building will commence after authorization from emergency responders.
- Take photos of the waste and the site to document conditions for the insurance companies or for litigation purposes if required

(3) Mixed Waste Deliveries

If staff becomes aware of a load of waste being delivered mixed with hazardous waste, it will be assumed the entire load is hazardous until testing documents otherwise. If a mixed load of hazardous and regular waste is received and detected by staff, the following will be followed:

- Staff will attempt to determine the hazardous nature of the waste and its threat to health

Mixed Waste Deliveries, continued

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- If appropriate due to the toxicity, instability, or flammability, personnel and customers will be evacuated from the area
- If necessary, staff will contact emergency personnel for assistance
- If the load can be safely isolated from the rest of the waste, the staff may attempt to do so.
- Containerized wastes will be handled per the Satellite Operations Plan
- If necessary, dirt berms or absorbents will be used to contain any run-off from the load
- DNR Field Office #5 will be notified in the event of leaking or spilled hazardous wastes
- If appropriate, a sample will be taken to determine if the load is hazardous or can be safely landfilled
- Photos will be taken to document the situation
- The generator/hauler will be contacted for information regarding the generator of the waste and responsibility of the clean up
- Cleanup will depend upon the materials involved and the directions from DNR.

(4) Fuels & Oils Spills/Releases

Response by staff to the spillage of fuels will include:

- Use of-site absorbent material to prevent any run-off and to contain the spill. Use the loader and/or tractor and blade to construct earthen berms around outdoor spills.
- Prevent any spilled fuel from leaving the site or entering surface water.
- If the spill of fuel occurs from a hauler's vehicle or due to an accident, take photos to document the site condition.
- Notify the Director

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- After contained, Transfer Station and Landfill staff will work to excavate the contaminated soils, transfer them to the Landfill, and place them in the Landfill's designated area for petroleum contaminated soil. The Agency's procedures for testing, handling, and treating contaminated soils will be followed.
- IDNR will be notified if the quantity spilled is reportable according to the IDNR "Guidelines for Reporting Hazardous Conditions".

(5) Waste Gases Releases

Waste is not retained on site long enough to decompose and generate methane or similar gases. However, if gases are received in the waste or an unacceptable odor is detected, staff will evacuate the building, cordon off the area to prevent exposure to employees and customers, ventilate any affected building as appropriate, and call trained HAZMAT services to provide for removal and cleanup of the waste.

Spent propane tanks and white goods are stored outside away from the areas of heaviest traffic flow to prevent inadvertent damage that may cause a release. If a tank or white good is struck, venting of any remaining gases will occur into the open air rather than into the enclosed transfer building. Transfer Station staff will block customer access to the white goods storage area if they notice a smell or sound indicative of a leak. Contact emergency responders to contain the release as necessary.

The Transfer Station is monitored quarterly for gas releases from the neighboring, closed Poweshiek County Landfill.

(6) Site Drainage Systems Spills/Releases

Hazardous waste spills or releases from hazardous waste dropped on the tipping floor or the concrete pad outside the Transfer Station will be contained in the wash water management system. Collected wash water will be treated through the Agency's contractor for wastewater treatment or other steps as necessary for the actual levels of contamination recorded in sampling conducted after containment of the spill.

(7) Off-Site Releases

Practices outlined above should keep hazardous wastes off transfer trailer and thus prevent an off-site release by an Agency vehicle.

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If an Agency vehicle has a fuel release while in transit, the driver shall immediately notify law enforcement or emergency response officials with jurisdiction for that location and follow their directions for response. The driver's second call will be to the Agency Director.

If a Transfer Station employee is made aware of an off-site release of hazardous materials from a customer vehicle, the employee will assist in notifying the law enforcement or emergency response officials with jurisdiction for that area. Transfer Station employees will not contact and will not use Agency equipment to segregate spilled waste. They may, at the request of emergency responders, use Agency equipment to aid in creating earthen berms.

See *ATTACHMENT E* for Reporting Hazardous Conditions to the state.

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F. Mass Movement of Land & Waste

(1) Earthquakes

Employees and customers will take cover within a doorway or out-of-doors until tremors have ceased. Emergency services and building contractor personnel will be contacted as needed thereafter.

Operators will check the levels of wash water in the storage tank after a seismic event to determine if there has been a release and follow the procedures outlined above as needed.

(2) Slope Failure

Not applicable.

(3) Waste Shifts

Not applicable.

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G. Emergency & Release Notifications & Reporting

(1) Federal Agencies

The Environmental Protection Agency (EPA) and Federal Emergency Management Administration (FEMA) will be notified of any incident over which they have jurisdiction.

EPA 1-800-424-8802
 FEMA (Iowa Emergency Management) 1-515-281-3231

(2) State Agencies

The Iowa departments of Natural Resources and/or Emergency Management will be notified of any incident over which they have jurisdiction.

Iowa DNR (Central office) 1-515-725-8694
 Iowa DNR (Field office 5) 1-515-725-0268
 Iowa Department of Emergency Management 1-515-281-3231

See *ATTACHMENT E* for reporting Hazardous Conditions

(3) County & City Agencies

The Poweshiek County Sheriff’s Office may be notified depending on the nature of the incident. This is done by calling 911 or (641) 623-5679.

The City of Malcom may be contacted depending on the nature of the incident. This is done by calling the city clerk at (641) 528-4245.

(4) News Media

The Agency has adopted a media notification policy for facility closings due to inclement weather and other incidents.

KGRN Radio 1-641-236-6106

All other media contacts will be handled through the Director:

Agency administrative office 1-641-828-8545

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Director cell 1-641-871-0201

See *ATTACHMENT F* for a listing of 4-County Media Fax/Phone numbers.

(5) Public & Private Facilities with Special Populations within Five Miles

There are no special populations (e.g., schools, prisons, etc.) within five miles of the Transfer Station. The Poweshiek County’s Sheriff’s Office will handle additional notification of populations within five miles of the Transfer Station via personal contact or vehicle-mounted public address systems.

(6) Emergency Response Agencies & Contact Information

EPA	1-800-424-8802
FEMA (Iowa Emergency Management)	1-515-281-3231
Iowa DNR (Central office)	1-515-725-8200
Iowa DNR (Field office 5)	1-515-725-0268
Iowa Department of Emergency Management	1-515-281-3231
Poweshiek County Sheriff’s Office	911 or (641) 623-5679
IOSHA (workplace safety)	1-877-242-6742
Iowa Department of Transportation (spills)	1-515-281-8793
Poweshiek County Engineer	1-641-623-5435
Grinnell Regional Medical Center	1-641-236-7511
Metro Waste Authority Regional Collection Center	515-967-5512
Norm Wrigley	515-333-4439 or 515-447-0014
Kyle Fischer	515-333-4431 or 515-238-0783

(7) Reporting Requirements & Forms

See *ATTACHMENT E* for reporting information.

Following notification by the Agency, each responding agency will be responsible for provision of their individual reports and for identifying the party responsible for completion. The Agency will respond as needed to comply with applicable regulations.

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H. Emergency Waste Management Procedures

(1) Communications

The primary communications channel is via land-based telephone lines.

Secondary communications are via cellular phone, depending on the individuals/agencies to be contacted.

(2) Temporary Discontinuation of Services

Short-Term

The Transfer Station is permitted to hold waste for up to two days. If the discontinuation of services is less than that, the initial decision may be to continue accepting wastes and to hold the materials collected on the tipping floor and in trailers to the extent either is accessible.

If neither the tipping floor nor the transfer trailers are operational, commercial delivery vehicles may temporarily be directed to direct haul to the Agency Landfill.

Long-Term

If the discontinuation of services is likely to exceed two days, commercial delivery vehicles will be directed to direct haul to the Agency Landfill until an alternative can be arranged. A roll-off box or other container will be provided at the Transfer Station for small, individual loads in the interim. The Agency will use existing equipment or lease additional equipment or contract for services as needed to provide ongoing service.

(3) Facilities Access & Rerouting

The only road leading to the Transfer Station is U.S. 6; however, U.S. 6 is accessible by several different routes including U.S. 63 from the north; and “old Highway 6” which intersects with U.S. 63 two miles west of the Station. If the portion of U.S. 6 directly in front of the Transfer Station were closed to traffic for longer than two working days, the Agency would make arrangements with Poweshiek County and/or the DOT to reroute drivers while maintaining access.

(4) Waste Acceptance

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If waste cannot be accepted at the Transfer Station because of an incident, damage, or emergency, delivery vehicles can, for the short term, be redirected to the Agency Landfill.

(5) Wastes In Process

Wastes in process are those tipped on the floor or loaded into the transfer trailers within the Transfer Station. To the extent that building and site conditions allow, wastes on the tipping floor will be loaded and the full semi-trailers delivered to the Agency Landfill.

If damage to the building or site prevents loading or removal of the trailer from the Station, the Agency will work with emergency services or contractors as needed to return the facility to operating mode as quickly as possible.

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I. Primary Emergency Equipment Inventory

(1) Major Equipment

Major equipment on-site consists of:

- End-loader (2)
- Semi-tractors (4)
- Extended cab pick-up (1)
- Live-bottom trailers (4)
- Scissors lift (1)

(2) Fire Hydrants & Water Sources

There are no fire hydrants located on-site. The main source of water would be through the Malcom Fire Department, which has a 2,500 gallon tanker truck, or via the Agency's 6,000 gallon tanker.

(3) Off-Site Equipment Resources

The Poweshiek County Malcom Shop is located adjacent to the Transfer Station. In the event of an emergency, arrangements may be made to access additional equipment.

The Agency has a variety of large equipment located approximately 57 miles away and could, if needed, supply a machine temporarily.

The Agency also has working relationships with a variety of area equipment dealers and can, as needed, temporarily rent a replacement unit.



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J. Emergency Aid

See *ATTACHMENT C* for Emergency Contacts.

The Agency Director should be notified of any injury: Rick Hurt: 641-828-8545; cell phone: 641-871-0201.

Any time a staff administers CPR or First Aid, they will complete a report to be kept on file at the Agency Landfill.

(1) Responder Contacts

Contact 911 for medical emergencies at the Poweshiek Transfer Station.

(2) Medical Services

East Poweshiek Ambulance Service, Brooklyn, is the primary responder to the Poweshiek Transfer Station. For major medical emergencies, ambulance services would also be provided via Mid-West Ambulance, Grinnell.

Directions to the Hospital are located in *ATTACHMENT D*.

(3) Contracts & Agreements

The Agency does not currently have response contracts or equipment loan agreements in place with other governmental agencies or contractors. However, the nature of the Transfer Station purchase arrangement between the Agency and Poweshiek County makes it advantageous for both parties to provide aid as needed to the Transfer Station.

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K. ERRAP Training Requirements

(1) Training Providers

All training on the ERRAP is at this time provided by Agency staff. Alternate contracts may be brought in as needed for training on items such as safety, first aid response, personnel issues, and so forth.

(2) Employee Orientation

All Agency employees, including those assigned to the Transfer Station, receive an orientation about their job prior to beginning work.

(3) Annual Training Updates

Annual training is completed to maintain and add to this awareness.

(4) Employee Orientation

A record of all training is held in employee files by the Agency Program Coordinator.



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Attachment A Site Map/ Emergency Assembly Point: Poweshiek Transfer Station



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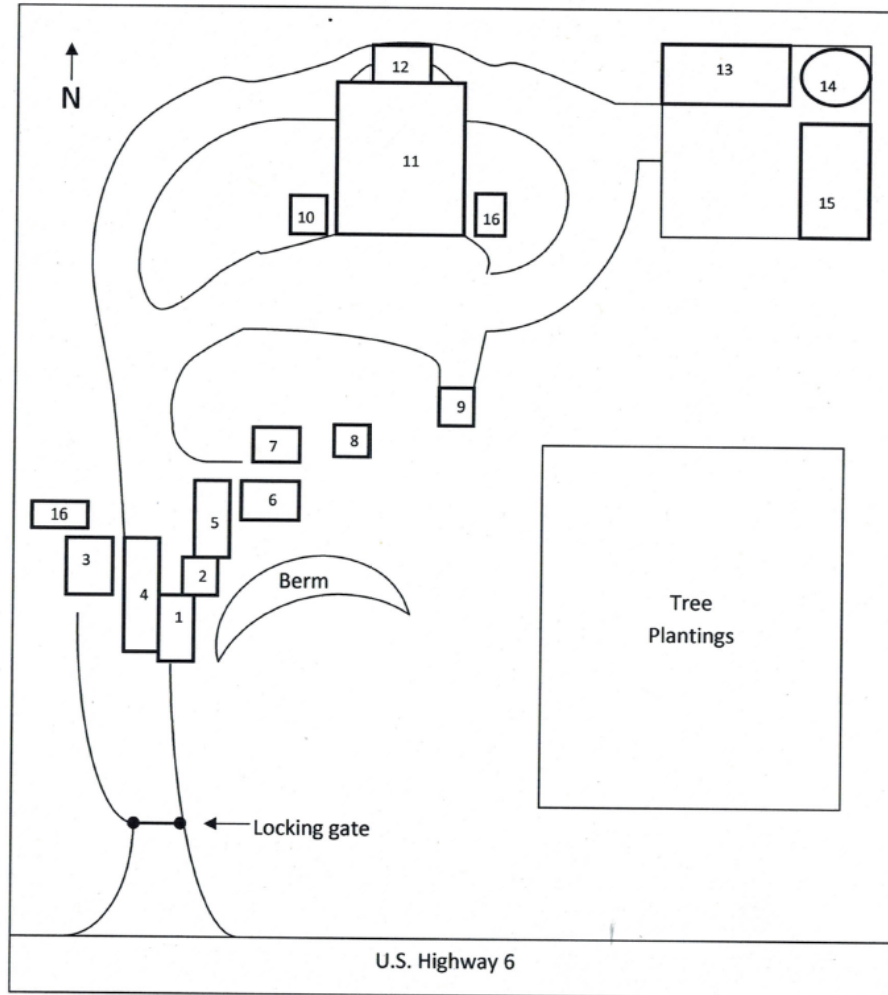


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- 1- Electronics Recycling
- 2- Lead Acid Battery Storage
- 3- Scale House
- 4- 70' Truck Scale
- 5- Recycling Drop-offs
- 6- Household Hazardous Waste Storage
- 7- Tire Recycling
- 8- Waste Oil Storage Shed with Containment
- 9- Hot Ash Unloading
- 10- Generator
- 11- Transfer Station
- 12- Washwater Storage (Confined Space)
- 13- White Goods and LP Tank Storage
- 14- Scrap Metal Recycling
- 15- Shingle Recycling
- 16- LP Tanks

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Attachment B

Inclement Weather Policy

Weather conditions occasionally create situations that are dangerous to staff and customers or unacceptable according to the sanitary disposal permits issued for facilities owned and operated by the South Central Iowa Solid Waste Agency. At these times, it may be appropriate for one or more Agency facilities to close to the public.

The Director, with input from the site foreman and such other resources as may be needed, has responsibility for determining to close any or all facilities. In the event that one or more facilities will be closed, the Director will give as much advance notice as reasonable given weather conditions.

Continued staff operations during such a closure shall be at the discretion of the Director with input from the site foreman. If the Landfill is closed due to inclement weather after the normal start of the working day:

- Hourly employees will be paid for a minimum of two hours of work if sent home by the Director or Landfill foreman less than two hours after beginning their work day.
- Hourly employees will be paid for time worked if sent home by the Director or Landfill foreman more than two hours after beginning their work day.
- In some situations, the Director or Landfill foreman may deem it appropriate to close the Landfill but have staff continue working. Staff members have the option to leave at the time the Landfill is closed. However, those that choose to leave when others remain shall be paid only for time worked or the two hour minimum, whichever is more. Those staff may choose to accept an abbreviated work week (i.e. be paid for less than 40 hours) or to use vacation time to cover the time not worked.

Inclement weather conditions that may lead to temporary closure to the public include, but are not limited to:

- Wind gusts in excess of 40 miles per hour
- Average wind speeds of 25 miles per hour or greater for one hour – calculated on 10 minute intervals
- Flooding on or near the facility
- Sustained heavy rain or snow that limit visibility and vehicle mobility
- Those identified as dangerous for travel by the Iowa Department of Transportation or National Weather Service

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If facilities are to be closed due to inclement weather conditions, major customers and media outlets shall be notified by telephone at the numbers listed on Attachment 1 (Landfill) and Attachment 2 (Transfer Station).

Amended by the Agency this 13th day of September 2006.

Effective upon approval.

Roger Schletzbaum, Chairman

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Attachment C

Emergency Contacts

Fire		
Fire Department / Rescue / Haz Mat		911
Medical/Hospitals		
Ambulance		911
Grinnell Regional Medical Center		(641) 236-7511
Pella Regional Health Center		(641) 628-3150
Spills/Hazardous Waste		
IDNR Spill Response (24 Hour)		(515) 281-8694
MWA Regional Collection Center		1-888-603-CREW
Kyle Fisher	Office	(515) 333-4431
	Cell	(515) 238-0783
Norm Wrigley		(515) 333-4439
Clean Harbors		(515) 262-2638
Federal - EPA		
Region 7		(800) 223-0425
EPA ID #IAD 098376111		
Engineer of Record		
H/LW Engineering, Inc.	Office	(515) 733-4144
Doug Luzbetak P.E.	Cell	(515) 290-0247
Glenn Hunter	Cell	(515) 290-1766
State of Iowa		
IDNR Field Office 5- Des Moines		(515) 725-8200
Mick Leat- DNR Engineer/permitting		(515) 725-8345
Sue Johnson- DNR Special Wastes		(515) 725-8317
Laurie Rasmus - DNR comprehensive planning		(515) 474-4921
IDOT Motor Carrier Division		(515) 237-3110
IDOT Hazardous Waste Information		(515) 237-3247

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Poweshiek County

Emergency Management

Brian Paul	Office	(641) 623-4357
Engineer		
Lyle Brehen, P.E.	Office	(641) 623-5435
Sheriff		
Thomas Kriegel	Office	(641) 623-5679
Sanitarian		
	Office	(641) 623-3762
Malcom Township Fire Dept		
	Office	(641)-528-4245

Leachate Treatment

Des Moines Wastewater Recovery Facility	Office	(515) 248-6310
---	--------	----------------

Utilities

Telephone	Windstream	(877) 901-4692
Water	Poweshiek Co Rural Water	(641) 842-3304
Electricity	Alliant Energy	(800) 255-4268
Propane	Key Cooperative	(800) 469-1040
Generator	Lowry Electric	(641)-623-3170

Staff

Transfer Station Office	Main	(641) 528-2801
Landfill Office	Main	(641) 828-8545
Director		
Rick Hurt	Cell	(641) 871-0201
Business Manager		
Leslie Sedlock	Cell	(641) 891-3368
Program Coordinator		
Jennifer Murphy	Cell	(641) 216-3106
Landfill Site Foreman		
Pat Flattery	Cell	(641) 895-1275
Landfill Operators:		
John Lee	Cell	(641) 891-4207
Nick Clark	Cell	(641) 218-9743
Shane Spaulding	Cell	(641) 2891-2896

Document Number: 006.C-200HS-003
 Original Issue Date: 1/13/17
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 PAST Review Dates:
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 PAST Revision Dates:

Issued By: Callie Rhoads
 Reviewed By:
 Approved By: Rick Hurt



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 Office & Landfill: 1736 Highway T17 ▪ Tracy, Iowa 50256 ▪ Tel: 641-828-8545 ▪ Fax: 641-842-3722
 Poweshiek Transfer Station: 1163 Highway 6 ▪ Malcom, Iowa 50157 ▪ Tel: 641-528-2801
www.sciswa.org

Joe Reed	Cell	(641) 891-24965
----------	------	-----------------

Transfer Station Lead Operator

Partner Maschmann	Cell	(641) 990-5163
-------------------	------	----------------

Transfer Station Operators:

Dustin Darrah	Cell	(641) 990-1241
---------------	------	----------------

Dunsmoor, Tony	Cell	(641) 990-8711
----------------	------	----------------

Jack, Scott	Cell	(641) 990-1214
-------------	------	----------------

Scale Operators:

McKim, Leslie (Landfill)	Cell	(641) 777-0158
--------------------------	------	----------------

Randy Puyear (Landfill)	Cell	(641) 780-5149
-------------------------	------	----------------

Dadrian Dean (Transfer Station)	Cell	(641) 990-6602
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McVey, Rita (Transfer Station)	Cell	(641) 275-2793
--------------------------------	------	----------------

Agency Board of Directors

Larry Davis, Chair	Lucas Co.	(641) 203-0810
--------------------	-----------	----------------

Steve McCombs	Marion Co.	(641) 891-1277
---------------	------------	----------------

Mike Beary	Monroe Co.	(641) 799-5797
------------	------------	----------------

Jason Roudabush, Vice	Poweshiek Co.	(641) 990-5268
-----------------------	---------------	----------------

Transfer Station Inclement Weather Notification List

Audas Sanitation	Office Steve cell	(641) 623-5691 (641) 990-2962
Craig Weir	Office	(641) 236-5278
Dodd's Sanitation	Office	(641) 791-9195
Gralnek Dunitz	Office	(641) 792-1484
Grinnell College	Office	(641) 269-3300
Grinnell Public Service	Office Dave Popp cell	(641) 236-2632 (641) 990-7519
Lyle Tompkins Property	Office	(641) 623-3934
Poweshiek County Conservation	Office	(641) 623-3191
S&J Sanitation	Office Doug cell	(319) 642-3325 (319) 981-9213
Sam Berman & Sons	Richard	(641) 236-5696

Document Number: 006.C-200HS-003

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Landfill Inclement Weather Notification List

Poweshiek Transfer Station		(641) 528-2801
Rathbun Transfer Station	Office	(641) 437-7279
	Rodger's cell	(641) 895-1408
ABS Sanitation	Office	(641) 842-5331
	Jody cell	(641) 891-4282
Audas Sanitation	Office	(641) 623-5691
	Steve cell	(641) 990-2962
Bennett Waste & Recycling	Monte cell	(515) 918-3711
Brown Town & Country	Office	(641) 842-4170
Carter Miller	Office	(641) 724-3673
	Jim cell	(641) 777-8461
Country Trash	Office	(641) 947-6000
	Jason cell	(641) 891-5556
Cowden Building	Home	(515) 848-3731
	Brad cell	(515) 971-2112
Craig Weir	Office	(641) 236-5278
Dodd's Trash & Recycling	Office	(641) 791-9195
Gralnek Dunitz	Office	(641) 792-1484
Grinnell College	Office	(641) 269-3300
Grinnell Public Service	Office	(641) 236-2632
	Dave Popp cell	(641) 990-7519
Lyle Tompkins Property	Office	(641) 623-3934
Midwest Sanitation	Office	(641) 628-2610
	Bryan cell	(641) 780-5610
	Matt cell	(641) 629-0481
Poweshiek County Conservation	Office	(641) 623-3191
S&J Sanitation	Office	(319) 642-3325
	Doug cell	(319) 981-9213
Sam Berman & Sons	Richard	(641) 236-5696
Waste Connections	Randy cell	(515) 729-4864
Waste Management	Dispatch	(515) 299-2588

Document Number: 006.C-200HS-003
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Attachment D

Nearby Hospitals & Medical Facilities

Grinnell Regional Medical Center: SCISWA Designated Healthcare Provider
(641) 236-7511

210 4th Ave, Grinnell, IA 50112

Estimated Drive Time: 13 minutes (9 miles)

Directions to Hospital/Clinic:

Start out going west on Hwy 6 to Grinnell, continue to follow for 9 miles.

Turn left onto Reed St.

Take the 2nd right onto 4th Ave. Hospital is on the left.

Pella Regional Health Center: SCISWA Designated Healthcare Provider
(641) 628-3150

404 Jefferson St, Pella, IA 50219

Estimated Drive Time: 50 minutes (41 miles)

Directions to Hospital/Clinic:

Start out going east on Hwy 6.

Turn right onto Hwy 63 South, continue to follow for 25 miles.

Stay straight to go onto Hwy IA-102, continue to follow for 2.6 miles.

Take slight right onto Hwy 102, continue to follow for 2 miles.

Turn left onto Hwy 102/Galeston Ave, continue to follow for 1 mile.

Turn right onto Hwy 102/140th St, continue to follow for 3.2 miles.

Turn left onto Hwy 102, continue to follow for 6.7 miles.

Stay straight to go onto Vermeer Rd, continue to follow for 1 mile.

Turn right onto Hazel St.

Turn left onto Jefferson St, hospital is on the right.

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Approved By: R. Hurt, Director



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www.sciswa.org

Attachment E

Iowa Department of Natural Resources (IDNR)

Guidelines for Hazardous Reporting

Document Number:	006.F-19OHS-002	Issued By:	SCISWA Board
Original Issue Date:	1/13/17	Reviewed By:	J. Frampton, Pro. Coordinator
Last Review Date:	3/5/19	Approved By:	R. Hurt, Director
PAST Review Dates:			
Last Revision Date:	3/5/19		
PAST Revision Dates:			



IOWA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL SERVICES DIVISION
FIELD SERVICES & COMPLIANCE BUREAU

Iowa Administrative Code Chapter 131 Notification of Hazardous Conditions

24 hour number for release reporting
515/725-8694

Summary of Key Points and Definitions

Definitions

“Hazardous Condition” means any situation involving the actual, imminent or probable spillage, leakage, or release of a hazardous substance onto the land, into a water of the state or into the atmosphere which, because of quantity, strength and toxicity of the hazardous substance, its mobility in the environment and its persistence, creates an immediate or potential danger to the public health or safety or to the environment.

“Hazardous Substance” means any substance or mixture of substance that presents a danger to the public health or safety and includes, but is not limited to, a substance that is toxic, corrosive, or flammable, or that is an irritant or that, in confinement, generates pressure through decomposition, heat, or other means. The following are examples of substances which, in sufficient quantity, may be hazardous: acids; alkalis; explosives; fertilizers; heavy metals such as chromium, arsenic, mercury, lead, and cadmium; industrial chemicals; paint thinners; paints; pesticides; petroleum products; poisons; radioactive materials; sludges; and organic solvents. “Hazardous substances” may include any hazardous waste identified or listed by the administrator of the United States Environmental Protection Agency under the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act of 1976, or any toxic pollutant listed under Section 307 of the federal Water Pollution Control Act as amended to January 1, 1977, or any hazardous substance designated under Section 311 of the federal Water Pollution Control Act as amended to January 1, 1977, or any hazardous material designated by the secretary of transportation under the Hazardous Materials Transportation Act (49 CFR 172.101)

Key Points

Who is Required to Report Hazardous Conditions. Any person manufacturing, storing, handling, transporting, or disposing of a hazardous substance shall notify the department at (515) 725-8694 and the local police department or the office of the sheriff of the affected county of the occurrence of a hazardous condition as soon as possible but not later than six hours after the onset of the hazardous condition or the discovery of the hazardous condition. A sheriff or police chief who has been notified of a hazardous condition shall immediately notify the department. Reports made pursuant to this rule shall be confirmed in writing as provided in 131.2(2).

Reporting Subsequent Findings. All subsequent finding and laboratory results should be reported and submitted in writing to the department as soon as they become available.

Reminder ~ VERBAL REPORTS ARE REQUIRED WITHIN 6 HOURS OF
INCIDENCE OCCURRENCE OR DISCOVERY.

REV. 1/2019



Guidelines for Reporting Hazardous Conditions Verbal Reporting

24 hour number for release reporting
515/725-8694

Report the Condition if:

- The hazardous substance has the potential to leave the property by run-off, sewers, tile lines, culverts, drains, utility lines, or some other conduit, or,
- The hazardous substance has the potential to reach a water of the state – either surface water or groundwater or,
- The hazardous substance can be detected in the air at the boundaries of the facility property by the senses (sight and smell) or by monitoring equipment or,
- There is a potential threat to the public health and safety or,
- Local officials (Fire department, law enforcement, Hazmat, public health, and emergency management) respond to the incident or,
- The release exceeds a Federal Reportable Quantity (RQ).

~ If in Doubt, Report It ~

IDNR REQUIRES VERBAL REPORTS WITHIN 6 HOURS OF
INCIDENCE OCCURRENCE OR DISCOVERY

- It is recommended that all spills be cleaned up although a particular spill may not be reportable. A series of small spills over time can result in one big cleanup.
- Department rules stress the immediate or potential danger that a spill may cause.
- A written report of the Hazardous Condition is required within 30 days of the verbal notification.

*In general, Iowa reporting requirements are more stringent than Federal reporting requirements. However, the **time limit** for reporting at the Federal level is more immediate.*



Guidelines for Reporting Hazardous Conditions Written Report Requirements

24 hour number for release reporting
515/725-8694

The Iowa Department of Natural Resources
Requires a written report of any Hazardous Condition.
(VERBAL REPORT REQUIRED WITHIN 6 HOURS)

Written Report. The written report of such a hazardous condition shall be submitted to the department within 30 days and contain the following information:

- a. The exact location of the hazardous condition.
- b. The time and date of onset or discovery of the hazardous condition.
- c. The name of the material, the manufacturer’s name, and the volume of each material involved in the hazardous condition in addition to contaminants within the material if they by themselves could cause a hazardous condition.
- d. The medium (land, water, or air) in which the hazardous condition occurred or exists.
- e. The name, address, and telephone number of the party responsible for the hazardous condition.
- f. The time and date of the verbal report to the department of the hazardous condition.
- g. The weather conditions at the time of the hazardous condition onset or discovery.
- h. The name, mailing address, and telephone number of the person reporting the hazardous condition.
- i. The name and telephone of the person closest to the scene of the hazardous condition who can be contacted for further information and action.
- j. Any other information, such as the circumstances leading to the hazardous condition, visible effects, and containment measures taken that may assist in the proper evaluation by the department.

The written report should include the IDNR Spill Number (assigned at the time of the verbal report) and be addressed to the duty officer responding to the spill. Reports can be sent via mail, fax, or electronic mail to the addresses listed below.

Mail	Fax	E-Mail
Iowa DNR Field Services Emergency Response 502 E. 9th Street Des Moines, IA 50319-0034	515/281-7229	Emergency_Response@dnr.iowa.gov



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Poweshiek Transfer Station: 1163 Highway 6 ▪ Malcom, Iowa 50157 ▪ Tel: 641-528-2801
www.sciswa.org

Attachment F

Media Contacts

Radio	
KNIA (Marion County)	(641) 842-3161
KELR (Lucas County)	(641) 774-8494
KIIC (Monroe County)	(641) 932-2112
KGRN (Poweshiek County)	(641) 236-6106

Newspapers	
Knoxville Journal Express	(641) 842-2155
Pella Chronicle	(641) 628-3882
Chariton Newspapers	(641) 774-2137
Albia Newspapers	(641) 932-7121
Poweshiek County CR	(641) 623-5116

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www.sciswa.org

Attachment G

At Risk Populations within 5 Miles

PCSA Shooting Range		
Clay Prior	President	(641) 990-1193
Randy Henschell	Trap Chair	(641) 751-7501

Document Number: 006.G-200HS-001

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J. Frampton, Pro. Coordinator

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Last Revision Date: 1/23/19

Approved By:

R. Hurt, Director

PAST Revision Dates: 3/2/15

ATTACHMENT E

2025 Closure Cost Estimate

Facility: Poweshiek Co Transfer Station
 Permit No.: 79-SDP-04-92P-XFR

Section K - Financial Assurance

Closure Cost per IAC 567-106.18(4)*

	Closure Cost
a. Disposal - Twice Maximum Transfer Station Storage Capacity	\$ 23,380
b. Cleaning - Facility Building & Washwater Disposal	\$ 12,410
c. Cost for Maintaining Financial Assurance	\$ -
Contingency 10%	\$ 3,579
Total Estimated Cost of Closure	\$ 39,369

Note:

* Task Items based on the list from IAC 567-106.18(4) Calculations are shown below

a. Disposal - Twice Maximum Transfer Station Storage Capacity

Assumptions:

1. Daily maximum storage rate per design and permit limit = 167
 Twice Transfer Station Storage Capacity 334
 19,500 tons/yr divided by 260 days/year
2. Based on SCISWA's existing operations and tipping fee.
 Transfer Station tipping fee \$70.00 per ton
 This includes costs of loading, transportation and landfill tipping fee
 The current MSW tip fee at the SCISWA landfill is \$42.50 per ton

Total Cost - Disposal	\$23,380	lump sum
------------------------------	-----------------	-----------------

b. Cleaning - Facility Building & Washwater Disposal

Assumptions:

b1. Transfer Station Building

1. Estimate building pressure wash cleaning at \$0.40/SF surface area and approx. 28,000 SF of interior surfaces
 Power Wash Transfer Station Building Cost = \$ 11,200

Total Cost - Cleaning Building	\$ 11,200	per event
---------------------------------------	------------------	------------------

b2. Washwater Disposal

1. Conservatively Estimate full tanker load for washwater volume = 6,000 gallons
2. Based on Des Moines wastewater charges, estimate disposal rates at
 Sanitary Waster Disposal Rate = \$0.10 per gallon
 Analytical Testing Fee = \$10.00 per load
 Tanker haul rate (estimate) = \$0.10 per gallon

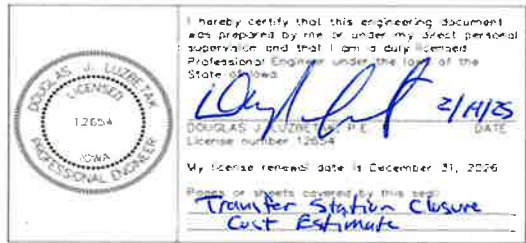
Total Cost - Washwater Disposal	\$ 1,210	per event
--	-----------------	------------------

c. Maintaing Financial Assurance

Identify costs, if any to maintain financial assurance pursuant to any other provisions of 567-Chapters 100 to 123, in accordance with subrule 106.18(3), 106.18(5) Acceptable financial assurance instruments.

SCISWA does not occur costs to maintain the financial assurance instrument

Total Cost - Maintaining FA	\$ -	per item
------------------------------------	-------------	-----------------





18700 N Hayden Road, Suite 255
Scottsdale, AZ 85255
800-821-5100

TS-FA

Brokerage Account Statement

* 0005178 01 AV 0.545 01 TR 00018 X108PD01 000000

SOUTH CENTRAL IOWA SOLID WASTE
AUTHORITY - POWESHIEK STATION
1736 HIGHWAY T17
TRACY IA 50256-8529



Scan for
Online Access



December 1, 2024 - December 31, 2024
Account Number: 73U-198915

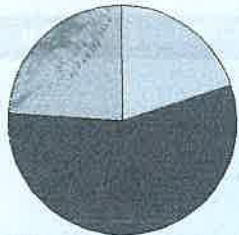
Your Financial Professional:
JOSEPH CONRAD CUNNINGHAM
(641) 820-0283

Portfolio at a Glance

	This Period
BEGINNING ACCOUNT VALUE	\$41,966.49
Dividends, Interest and Other Income	100.06
Net Change in Portfolio¹	-644.49
ENDING ACCOUNT VALUE	\$41,422.06
Estimated Annual Income	\$1,041.25

¹ Net Change in Portfolio is the difference between the ending account value and beginning account value after activity.

Asset Summary



Asset Type	Last Period	This Period
Cash, Money Funds, and Bank Deposits	8,145.09	8,245.15
Mutual Funds	23,489.20	23,054.66
Exchange-Traded Products	10,332.20	10,122.25
Account Total (Pie Chart)	\$41,966.49	\$41,422.06

Please review your allocation periodically with your Financial Professional.

Client Service Information

Your Financial Professional: CVY

JOSEPH CONRAD CUNNINGHAM
305 E MAIN
KNOXVILLE IA 50138

Contact Information

Business: (641) 820-0283
Fax: (641) 828-7840



Your Account Information

TAX LOT DEFAULT DISPOSITION METHOD

Default Method for Mutual Funds: First In First Out
 Default Method for Stocks in a Dividend Reinvestment Plan: First In First Out
 Default Method for all Other Securities: First In First Out

BOND AMORTIZATION ELECTIONS

Amortize premium on taxable bonds based on Constant Yield Method: Yes
 Accrual market discount method for all other bond types: Constant Yield Method
 Include market discount in income annually: No

ELECTRONIC DELIVERY

You have **not** enrolled any documents for electronic delivery. The following documents are available for electronic delivery:

Statements and Reports	Notifications	Tax Documents
Trade Confirmations	Prospectus	Proxy/Shareholder Communications

Please log in to your account or contact your Financial Professional to make any changes to your electronic delivery preferences.

Activity Summary *(All amounts shown are in base currency)*

	Credits This Period	Debits This Period	Net This Period	Credits Year-to-Date	Debits Year-to-Date	Net Year-to-Date
Securities						
Securities Deposited	0.00	0.00	0.00	10,232.45	0.00	10,232.45
Total Securities	\$0.00	\$0.00	\$0.00	\$10,232.45	\$0.00	\$10,232.45
Dividends and Interest	\$100.06	\$0.00	\$100.06	\$820.90	\$0.00	\$820.90
Totals	\$100.06	\$0.00	\$100.06	\$11,053.35	\$0.00	\$11,053.35

Transactions by Type of Activity

Process/ Settlement Date	Activity Type	Description	Quantity	Price	Accrued Interest	Amount	Currency
Dividends and Interest							
12/02/24	CASH DIVIDEND RECEIVED SGVIX	ALLSPRING GOVERNMENT SECURITIES FUND INSTITUTIONAL CLASS FOR ACCRUAL PERIOD ENDING 11/29/24				66.79	USD
12/05/24	CASH DIVIDEND RECEIVED TIP	95 SHRS ISHARES TR TIPS BD ETF RD 12/02 PD 12/05/24				18.04	USD
12/23/24	CASH DIVIDEND RECEIVED TIP	95 SHRS ISHARES TR TIPS BD ETF RD 12/18 PD 12/23/24				15.23	USD
Total Dividends and Interest - U.S. DOLLARS					0.00	100.06	

Transactions by Type of Activity (continued)

Process/ Settlement Date	Activity Type	Description	Quantity	Price	Accrued Interest	Amount	Currency
Total Value of Transactions						0.00	100.06 USD

The price and quantity displayed may have been rounded.

Portfolio Holdings

Opening Date	Quantity	Account Number	Activity Ending	Opening Balance	Closing Balance	Accrued Income	Income This Year	30-Day Yield	Current Yield
CASH, MONEY FUNDS AND BANK DEPOSITS 20.00% of Portfolio									
Cash Balance				8,145.09	8,245.15				
TOTAL CASH, MONEY FUNDS AND BANK DEPOSITS				\$8,145.09	\$8,245.15	\$0.00	\$0.00		

Date Acquired	Quantity	Unit Cost	Current Cost Basis	Market Price	Market Value	Unrealized Gain/Loss	Estimated Annual Income	Estimated Yield	
MUTUAL FUNDS 56.00% of Portfolio									
ALLSPRING GOVERNMENT SECURITIES FUND INSTITUTIONAL CLASS Open End Fund Dividend Option: Cash; Capital Gains Option: Cash Security Identifier: SGVIX CUSIP: 949917579									
03/27/09 ³	371.3900	10.7300	3,985.14	9.5500	3,546.77	-438.37	123.28	3.47%	
Total Noncovered	371.3900		3,985.14		3,546.77	-438.37	123.28		
01/08/14 ³	2,042.7110	10.7300	21,918.29	9.5500	19,507.89	-2,410.40	678.03	3.47%	
Total Covered	2,042.7110		21,918.29		19,507.89	-2,410.40	678.03		
Total	2,414.1010		\$25,903.43		\$23,054.66	-\$2,848.77	\$801.31		
TOTAL MUTUAL FUNDS			\$25,903.43		\$23,054.66	-\$2,848.77	\$801.31		

Date Acquired	Quantity	Unit Cost	Current Cost Basis	Market Price	Market Value	Unrealized Gain/Loss	Estimated Annual Income	Estimated Yield	
EXCHANGE-TRADED PRODUCTS 24.00% of Portfolio									
ISHARES TR TIPS BD ETF Dividend Option: Cash; Capital Gains Option: Cash Security Identifier: TIP CUSIP: 464287176									
07/25/12 ³	95.0000	121.3000	11,523.50	106.5500	10,122.25	-1,401.25	239.94	2.37%	
TOTAL EXCHANGE-TRADED PRODUCTS			\$11,523.50		\$10,122.25	-\$1,401.25	\$239.94		



Portfolio Holdings (continued)

	Current Cost Basis	Market Value	Unrealized Gain/Loss	Accrued Interest	Estimated Annual Income
Total Portfolio Holdings	\$45,672.08	\$41,422.06	-\$4,250.02	\$0.00	\$1,041.25

* Noncovered under the cost basis rules as defined below.

Generally, securities acquired before 2011, in retirement accounts or held by Non-U.S. entities are not subject to the cost basis reporting rules set forth in the Internal Revenue Code of 1986, as amended by the Emergency Economic Stabilization Act of 2008, and are marked as "noncovered". Securities marked as "covered", were identified as securities potentially subject to the cost basis reporting rules and may be reported to the IRS on form 1099-B for the applicable tax year in which the securities are disposed.

Note: In the event where we cannot easily determine the taxability of an account, we may mark the account as noncovered. However, if the account does not receive a 1099B, the cost basis will not be reported to the IRS.

³ The cost basis of this security has been provided to us by you or your introducing firm and Pershing makes no representation as to the accuracy of this information.

Portfolio Holdings Disclosures

Pricing

This section includes the net market value of the securities in your account on a settlement date basis, including short positions, at the close of the statement period. The market prices, unless otherwise noted, have been obtained from independent vendor services, which we believe to be reliable. In some cases the pricing vendor may provide prices quoted by a single broker or market maker. Market prices do not constitute a bid or an offer, and may differ from the actual sale price. Securities for which a price is not available are marked "N/A" and are omitted from the Total.

THE AS OF PRICE DATE ONLY APPEARS WHEN THE PRICE DATE DOES NOT EQUAL THE STATEMENT DATE.

Estimated Annual Figures

The estimated annual income (EAI) and estimated annual yield (EAY) figures are estimates and for informational purposes only. These figures are not considered to be a forecast or guarantee of future results. These figures are computed using information from providers believed to be reliable; however, no assurance can be made as to the accuracy. Since interest and dividend rates are subject to change at any time, and may be affected by current and future economic, political, and business conditions, they should not be relied on for making investment, trading, or tax decisions. These figures assume that the position quantities, interest and dividend rates, and prices remain constant. A capital gain or return of principal may be included in the figures for certain securities, thereby overstating them. Refer to www.pershing.com/disclosures for specific details as to formulas used to calculate the figures. Accrued interest represents interest earned but not yet received.

Reinvestment

The dollar amount of Mutual Fund distributions, Money Market Fund dividend income, Bank Deposit interest income, or dividends for other securities shown on your statement may have been reinvested. You will not receive confirmation of these reinvestments. Upon written request to your financial institution, information pertaining to these transactions, including the time of execution and the name of the person from whom your security was purchased, may be obtained. In dividend reinvestment transactions, Pershing acts as your agent and receives payment for order flow.

Option Disclosure

Information with respect to commissions and other charges incurred in connection with the execution of option transactions has been included in confirmations previously furnished to you. A summary of this information is available to you promptly upon your written request directed to your introducing firm. In order to assist your introducing firm in maintaining current background and financial information concerning your option accounts, please promptly advise them in writing of any material change in your investment objectives or financial situation. Expiring options which are valuable are exercised automatically pursuant to the exercise by exception procedure of the Options Clearing Corporation. Additional information regarding this procedure is available upon written request to your introducing firm.



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Portfolio Holdings Disclosures (continued)

Foreign Currency Transactions

Pershing will execute foreign currency transactions as principal for your account. Pershing may automatically convert foreign currency to or from U.S. dollars for dividends and similar corporate action transactions unless you instruct your financial organization otherwise. Pershing's currency conversion rate will not exceed the highest interbank conversion rate identified from customary banking sources on the conversion date or the prior business day, increased by up to 1%, unless a particular rate is required by applicable law. Your financial organization may also increase the currency conversion rate. This conversion rate may differ from rates in effect on the date you executed a transaction, incurred a charge, or received a credit. Transactions converted by agents (such as depositories) will be billed at the rates such agents use.

Proxy Vote

Securities not fully paid for in your margin account may be lent by Pershing to itself or others in accordance with the terms outlined in the Margin Agreement. The right to vote your shares held on margin may be reduced by the amount of shares on loan. The Proxy Voting Instruction Form sent to you may reflect a smaller number of shares entitled to vote than the number of shares in your margin account.

Variable Rate Securities

Interest rate data for certain complex and/or variable rate securities is provided to Pershing by third-party data service providers pursuant to contractual arrangements. Although we seek to use reliable sources of information, the accuracy, reliability, timeliness, and completeness of interest rate data may vary sometimes, particularly for complex and/or variable rate securities and those with limited or no secondary market. As a result, we can offer no assurance as to the accuracy, reliability, timeliness, or completeness of interest rate data for such securities. Pershing may also occasionally make interest rate updates and adjustments based on its reasonable efforts to obtain accurate, reliable, timely, and/or complete interest rate data from other data sources, but we can similarly provide no assurance that those rates or adjustments will be accurate, reliable, timely, or complete.

When updated interest rate data is received from a third-party data service provider or adjusted by Pershing, the updated data will be reflected in various sources where interest rate data is used or viewed, including both paper and electronic communications and data sources. Prior use or communication of interest rate-related data will not be revised. Since variable interest rates may be subject to change at any time and are only as accurate as the data received from third-party data service providers or otherwise obtained by Pershing, interest rate data should not be relied on for making investment, trading, or tax decisions. All interest rate data and other information derived from and/or calculated using interest rates are not warranted as to accuracy, reliability, timeliness, or completeness and are subject to change without notice. Pershing disclaims any responsibility or liability to the fullest extent permitted by applicable law for any loss or damage arising from any reliance on or use of the interest rate data or other information derived from and/or calculated using interest rates in any way. You should request a current valuation for your securities from your financial adviser or broker prior to making a financial decision or placing an order or requesting a transaction in these securities.

Structured Products

Structured products in this section are complex products and may be subject to special risks, which may include, but are not limited to: loss of initial investment; issuer credit risk; limited or no appreciation; risks associated with the underlying reference asset(s); no periodic payments; call prior to maturity (a redemption could affect the yield represented); early redemption fees or other applicable fees; price volatility resulting from issuer's and/or guarantor's credit quality; lower interest rates and/or yield compared to conventional debt with a comparable maturity; unique tax implications; concentration risk of owning the related security; limited or no secondary market; restrictions on transferability; conflicts of interest; and limits on participation in appreciation of underlying asset(s). To review a complete list of risks, please refer to the offering documents for the structured product. For more information about the risks specific to your structured products, you should contact your financial institution or advisor. Certain structured products are designed to make periodic distributions to you and any such structured product distributions you receive will be listed in the Transactions section of your statement. Structured product distributions may be listed there as "Bond Interest Received"; however, this description is not intended to reflect a determination as to either the asset classification of the product or the U.S. tax treatment of such distributions.

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Clearing through Pershing LLC, a wholly owned subsidiary of The Bank of New York Mellon Corporation (BNY Mellon)
Pershing LLC, member FINRA, NYSE, SIPC



Income and Expense Summary

	Current Period		Year-to-Date	
	Taxable	Non Taxable	Taxable	Non Taxable
Dividend Income				
Other Dividends	100.06	0.00	820.90	0.00
Total Income	\$100.06	\$0.00	\$820.90	\$0.00

Messages

The Estimated Annual Income, Estimated Yield and Accrued Interest columns in your Portfolio Holdings section will not display values for variable rate securities. The optional Estimated Annual Income and Accrued Interest fields in the Portfolio at a Glance section of your statement will not include values for these securities.

Although a money market mutual fund (money fund) seeks to preserve the value of your investment at \$1 per share, it is possible to lose money by investing in a money fund. Shares of a money fund or the balance of a bank deposit product held in your brokerage account may be liquidated upon request with the proceeds credited to your brokerage account. Please see the money fund's prospectus or the bank deposit product's disclosure document or contact your advisor for additional information. Pursuant to SEC Rule 10b-10(b)(1) confirmations are not sent for purchases into money funds processed on the sweep platform. Pursuant to applicable regulation, account statements will be produced monthly or quarterly. Balances in Federal Deposit Insurance Corporation (FDIC)-insured bank deposit sweep products are not protected by Securities Investor Protection Corporation (SIPC).

Please note the following information for Pershing's IRS Form 1099 (B, DIV, INT, MISC and OID): Your Form 1099 will be delivered in the first months of the year, beginning January 31. By February 14, you will be mailed either your Form 1099 or a special Pending 1099 Notice. The Pending 1099 Notice will be sent if we have not received and processed final information from issuers and trustees of securities that you hold by the as of date of the February 14 Form 1099 delivery. You will also be sent the notice if your information is still being reviewed and finalized. The notice will inform you of the securities that are pending final reporting and provides the anticipated delivery date of your 1099. Your 1099 will be delivered no later than March 14.

Effective January 1, 2025, there will be a change to the \$1.50 per transaction Paper Surcharge - Trade Confirmation fee. For clients who have not elected to receive electronic delivery of account statements, trade confirmations, prospectuses, proxy/shareholder communications, and other account notices, you will continue to receive such documents by mail and the new fee will be \$4.50 per quarter, per account, charged in arrears at the end of the quarter. You can eliminate this fee by signing up for electronic delivery by contacting your Financial Professional or go to equipt.osaic.com. The new 2025 fee schedule can be found at osaic.com/disclosures. DirectChoice accounts are exempt from the fee.

Important Information and Disclosures

The Role of Pershing

- **Pershing LLC, member FINRA, NYSE, carries your account as clearing broker pursuant to a clearing agreement with your financial institution.** Pershing is not responsible or liable for any acts or omissions of your financial institution or its employees and it does not supervise them. Pershing provides no investment advice nor does it assess the suitability of any transaction or order. Pershing acts as the agent of your financial institution and you agree that you will not hold Pershing or any person controlling or under common control with it liable for any investment losses incurred by you.
- Pershing performs several key functions at the direction of your financial institution. It acts as custodian for funds and securities you may deposit with it directly or through your financial institution or that it receives as the result of securities transactions it processes.
- Your financial institution is responsible for adherence to the securities laws, regulations and rules which apply to it regarding its own operations and the supervision of your account, its sales representatives and other personnel. Your financial institution is also responsible for approving the opening of accounts and obtaining account documents; the acceptance and, in certain instances, execution of securities orders; the assessment of the suitability of those transactions, where applicable; the rendering of investment advice, if any, to you and in general, for the ongoing relationship that it has with you.
- Inquiries concerning the positions and balances in your account may be directed to the **Pershing Customer Service Department at (201) 413-3333**. All other inquiries regarding your account or activity should be directed to your financial institution. Your financial organization's contact information can be found on the first page of this statement.
- For a description of other functions performed by Pershing please consult the Disclosure Statement provided to you upon the opening of your account. This notice is not meant as a definitive enumeration of every possible circumstance, but as a general disclosure. If you have any questions regarding this notice or if you would like additional copies of the Disclosure Statement, please contact your financial institution.



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Important Information and Disclosures (continued)

The Role of Pershing (continued)

- Pershing is a member of the Securities Investor Protection Corporation (SIPC®). Please note that SIPC does not protect against loss due to market fluctuation. In addition to SIPC protection, Pershing provides coverage in excess of SIPC limits. For more detailed information please visit: www.pershing.com/about/strength-and-stability.
- This statement will be deemed conclusive. You are advised to report any inaccuracy or discrepancy (including unauthorized trading) promptly, but no later than ten days after receipt of this statement, to your financial organization and Pershing. Please be advised that any oral communication should be re-confirmed in writing to further protect your rights, including your rights under the Securities Investor Protection Act.
- Your financial organization's contact information can be found on the first page of this statement. Pershing's contact information is as follows: **Pershing LLC, Legal Department, One Pershing Plaza, Jersey City, New Jersey 07399; (201) 413-3330**. Errors and Omissions excepted.

Important Arbitration Disclosures

- All parties to this agreement are giving up the right to sue each other in court, including the right to a trial by jury, except as provided by the rules of the arbitration forum in which a claim is filed.
- Arbitration awards are generally final and binding; a party's ability to have a court reverse or modify an arbitration award is very limited.
- The ability of the parties to obtain documents, witness statements and other discovery is generally more limited in arbitration than in court proceedings.
- The arbitrators do not have to explain the reason(s) for their award, unless, in an eligible case, a joint request for an explained decision has been submitted by all parties to the panel at least 20 days prior to the first scheduled hearing date.
- The panel of arbitrators will typically include a minority of arbitrators who were or are affiliated with the securities industry.
- The rules of some arbitration forums may impose time limits for bringing a claim in arbitration. In some cases, a claim that is ineligible for arbitration may be brought in court.
- The rules of the arbitration forum in which the claim is filed, and any amendments thereto, shall be incorporated into this agreement.

Important Arbitration Agreement

Any controversy between you and Pershing LLC shall be submitted to arbitration before the Financial Industry Regulatory Authority. No person shall bring a putative or certified class action to arbitration, nor seek to enforce any predispute arbitration agreement against any person who has initiated in court a putative class action, who is a member of a putative class who has not opted out of the class with respect to any claims encompassed by the putative class action until; (I) the class certification is denied; (II) the class is decertified; or (III) the client is excluded from the class by the court. Such forbearance to enforce an agreement to arbitrate shall not constitute a waiver of any rights under this agreement except to the extent stated herein. The laws of the State of New York govern.

Pershing's contact information is as follows: **Pershing LLC, Legal Department, One Pershing Plaza, Jersey City, New Jersey 07399; (201) 413-3330**.

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TERMS AND CONDITIONS

GENERAL INFORMATION

- WHENEVER YOU ARE INDEBTED TO PERSHING LLC ("BNY PERSHING") FOR ANY AMOUNT, ALL SECURITIES HELD BY IT FOR YOU IN ANY ACCOUNT IN WHICH YOU HAVE ANY INTEREST SHALL SECURE ALL YOUR LIABILITIES TO BNY PERSHING, AND BNY PERSHING MAY IN ITS DISCRETION AT ANY TIME, WITHOUT TENDER, DEMAND OR NOTICE TO YOU, CLOSE OR REDUCE ANY OR ALL OF YOUR ACCOUNTS BY PUBLIC OR PRIVATE SALE OR PURCHASE OR BOTH OF ALL OR ANY SECURITIES CARRIED IN SUCH ACCOUNTS; ANY BALANCE REMAINING DUE BNY PERSHING TO BE PROMPTLY PAID BY YOU.
- WHENEVER YOU ARE INDEBTED TO BNY PERSHING FOR ANY AMOUNT, ALL SECURITIES CARRIED FOR YOUR ACCOUNT ARE OR MAY BE, WITHOUT FURTHER NOTICE TO YOU, LOANED OR PLEDGED BY BNY PERSHING, EITHER SEPARATELY OR UNDER CIRCUMSTANCES WHICH WILL PERMIT THE COMMINGLING THEREOF, WITH OTHER SECURITIES FOR ANY AMOUNT LESS THAN, EQUAL TO OR GREATER THAN YOUR LIABILITIES TO BNY PERSHING, BUT NOT UNDER CIRCUMSTANCES FOR AN AMOUNT PROHIBITED BY LAW.
- BNY PERSHING MAY TRADE FOR ITS OWN ACCOUNT AS A MARKET MAKER, SPECIALIST, ODD LOT DEALER, BLOCK POSITIONER, ARBITRAGEUR, OR INVESTOR. CONSEQUENTLY, AT THE TIME OF ANY TRANSACTION YOU MAY MAKE, BNY PERSHING MAY HAVE A POSITION IN SUCH SECURITIES, WHICH POSITION MAY BE PARTIALLY OR COMPLETELY HEDGED.
- IF AVERAGE PRICE TRANSACTION IS INDICATED ON THE FRONT OF THIS STATEMENT YOUR FINANCIAL INSTITUTION OR BNY PERSHING MAY HAVE ACTED AS PRINCIPAL, AGENT, OR BOTH. DETAILS AVAILABLE UPON REQUEST.
- A FINANCIAL STATEMENT OF BNY PERSHING IS AVAILABLE FOR YOUR PERSONAL INSPECTION AT BNY PERSHING'S OFFICES. A COPY OF IT WILL BE MAILED UPON YOUR WRITTEN REQUEST OR YOU CAN VIEW IT ONLINE AT www.bny.com/pershing.
- FOR BUSINESS CONTINUITY AND ADDITIONAL DISCLOSURES: www.bny.com/pershing/us/en/disclosures.html
- THIS STATEMENT SHOULD BE RETAINED FOR YOUR RECORDS.

TRANSACTIONS

- ALL ORDERS AND TRANSACTIONS SHALL BE SOLELY FOR YOUR ACCOUNT AND RISK SHALL BE SUBJECT TO THE CONSTITUTION, RULES, REGULATIONS, CUSTOMS, USAGES, RULINGS AND INTERPRETATIONS OF THE EXCHANGE OR MARKET AND THE CLEARING FACILITY, IF ANY, WHERE THE TRANSACTIONS ARE EXECUTED AND/OR SETTLED, OR IF APPLICABLE, OF THE FINANCIAL INDUSTRY REGULATORY AUTHORITY AND TO ALL APPLICABLE LAWS AND REGULATIONS.
- TITLE TO SECURITIES SOLD TO YOU, WHERE BNY PERSHING HAS ACTED AS PRINCIPAL, SHALL REMAIN WITH BNY PERSHING UNTIL THE ENTIRE PURCHASE PRICE IS RECEIVED OR UNTIL THE SETTLEMENT DATE, WHICHEVER IS LATER.
- YOU MAY HAVE RECEIVED CONFIRMATIONS FOR TRANSACTIONS WHICH DO NOT APPEAR ON YOUR STATEMENT. IF SO, THE TRANSACTIONS WILL APPEAR ON YOUR NEXT PERIODIC STATEMENT. SUCH TRANSACTIONS MUST BE CONSIDERED BY YOU WHEN COMPUTING THE VALUE OF YOUR ACCOUNT. THIS IS ESPECIALLY TRUE IF YOU HAVE WRITTEN OPTIONS WHICH HAVE BEEN EXERCISED.

FREE CREDIT BALANCES: ANY FREE CREDIT BALANCE CARRIED FOR YOUR ACCOUNT REPRESENTS FUNDS PAYABLE UPON DEMAND WHICH, ALTHOUGH PROPERLY ACCOUNTED FOR ON BNY PERSHING'S BOOKS OF RECORD, ARE NOT SEGREGATED AND MAY BE USED IN THE CONDUCT OF ITS BUSINESS.

DEBIT BALANCES: INTEREST CHARGED ON DEBIT BALANCES IN YOUR ACCOUNT APPEARS ON THE STATEMENT. THE RATE OF INTEREST AND PERIOD COVERED ARE INDICATED. THE RATE MAY CHANGE FROM TIME TO TIME DUE TO FLUCTUATIONS IN MONEY RATES OR OTHER REASONS. INTEREST IS COMPUTED AS DESCRIBED IN MATERIAL PREVIOUSLY FURNISHED TO YOU. PLEASE CONTACT YOUR FINANCIAL INSTITUTION IF YOU DESIRE ADDITIONAL COPIES.

MARGIN INFORMATION: IF YOU MAINTAIN A MARGIN ACCOUNT, THIS IS A COMBINED STATEMENT OF YOUR GENERAL ACCOUNT AND A SPECIAL MEMORANDUM ACCOUNT MAINTAINED FOR YOU UNDER REGULATION T OF THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM. THE PERMANENT RECORD OF THE SEPARATE ACCOUNT AS REQUIRED BY REGULATION T IS AVAILABLE FOR YOUR INSPECTION UPON REQUEST.

TAX INFORMATION

- AFTER YEAR END, BNY PERSHING IS REQUIRED TO PROVIDE TAX INFORMATION TO THE INTERNAL REVENUE SERVICE AND OTHER GOVERNMENTAL AUTHORITIES. AT THAT TIME BNY PERSHING WILL PROVIDE THAT INFORMATION ON THE ANNUAL TAX INFORMATION STATEMENT TO YOU; USE THAT STATEMENT TO PREPARE YOUR TAX FILINGS. THE TAX STATEMENT ALSO INCLUDES OTHER USEFUL INFORMATION TO ASSIST IN ACCUMULATING THE DATA TO PREPARE YOUR TAX RETURNS.
- DIVIDENDS, INTEREST AND OTHER DISTRIBUTIONS SHOWN ON THIS STATEMENT WERE CLASSIFIED AS TAXABLE OR NONTAXABLE BASED ON CERTAIN INFORMATION KNOWN AS OF THE DISTRIBUTION DATE. THIS CLASSIFICATION IS SUBJECT TO CHANGE AND IS SOLELY INTENDED FOR USE AS GENERAL INFORMATION.

- BNY PERSHING DOES NOT PROVIDE TAX, INVESTMENT OR LEGAL ADVISORY SERVICES AND NO ONE ASSOCIATED WITH BNY PERSHING IS AUTHORIZED TO RENDER SUCH ADVICE. DO NOT RELY UPON ANY SUCH ADVICE, IF GIVEN. INVESTORS ARE ENCOURAGED TO CONSULT THEIR TAX ADVISORS TO DETERMINE THE APPROPRIATE TAX TREATMENT OF THEIR BUSINESS.

PAYMENT FOR ORDER FLOW AND ORDER ROUTING POLICY DISCLOSURES (REGULATION NMS – RULE 607 (A) (1) – (2))

BNY PERSHING SENDS EQUITY AND OPTION ORDERS TO EXCHANGES, OR BROKER-DEALERS AS MARKET MAKERS OR AUTOMATED TRADING SYSTEMS (ATSS). CERTAIN OF THESE VENUES PROVIDE PAYMENTS TO BNY PERSHING OR CHARGE ACCESS FEES TO BNY PERSHING DEPENDING UPON THE CHARACTERISTICS OF THE ORDER AND ANY SUBSEQUENT EXECUTION. THE DETAILS OF THESE PAYMENTS AND FEES ARE AVAILABLE UPON WRITTEN REQUEST. COMPENSATION IS GENERALLY IN THE FORM OF A PER SHARE OR PER OPTION CONTRACT CASH PAYMENT. IN ADDITION, BNY PERSHING EXECUTES CERTAIN TRANSACTIONS IN EQUITY PREFERRED SECURITIES AND FRACTIONAL SHARES AS PRINCIPAL. BNY PERSHING ALSO ROUTES CERTAIN EQUITY ORDERS TO ITS AFFILIATE, BNY MELLON CAPITAL MARKETS, LLC, FOR EXECUTION AS PRINCIPAL.

BEST EXECUTION: NOTWITHSTANDING THE PREVIOUS PARAGRAPH REGARDING PAYMENT FOR ORDER FLOW, BNY PERSHING SELECTS CERTAIN MARKET CENTERS TO PROVIDE EXECUTION OF OVER-THE-COUNTER AND EXCHANGE-LISTED SECURITIES TRANSACTIONS WHICH AGREE TO ACCEPT ORDERS, TRANSMITTED ELECTRONICALLY UP TO A SPECIFIED SIZE, AND TO EXECUTE THEM AT OR BETTER THAN THE NATIONAL BEST BID OR OFFER (NBBO). IN CERTAIN SECURITIES THAT ARE NOT ELECTRONICALLY QUOTED, BNY PERSHING DIRECTLY CONTACTS MARKET CENTERS TO OBTAIN AN EXECUTION. THE DESIGNATED MARKET CENTERS TO WHICH ORDERS ARE AUTOMATICALLY ROUTED ARE SELECTED BASED ON THE CONSISTENT HIGH QUALITY OF THEIR EXECUTIONS AND THEIR ABILITY TO PROVIDE OPPORTUNITIES FOR EXECUTIONS AT PRICES SUPERIOR TO THE NBBO. BNY PERSHING ALSO REGULARLY REVIEWS REPORTS FOR QUALITY OF EXECUTION PURPOSES.

IF ANY OF THE ABOVE TERMS AND CONDITIONS ARE UNACCEPTABLE TO YOU, PLEASE NOTIFY BNY PERSHING IMMEDIATELY IN WRITING BY CERTIFIED MAIL TO ONE PERSHING PLAZA, JERSEY CITY, NJ 07399, ATTN: LEGAL DEPT



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