

October 29, 2015

Board of Directors

**Iowa Comprehensive Petroleum
UST Fund Board**



IOWA UNDERGROUND STORAGE TANK FUND

Douglas M. Beech, *Chairperson*

Dale T. Cira, *Administrator*

Board Members:

Michael L. Fitzgerald

Joseph D. Barry

Jeff. W. Robinson

Karen E. Andeweg

Chuck Gipp

Timothy L. Gartin

Dawn M. Carlson

Patricia J. Beck

N. Kurt Mumm

NOTICE OF PUBLIC MEETING

A public meeting of the Iowa Comprehensive Petroleum Underground Storage Tank Fund Board has been scheduled for 10:00 A.M., Thursday, October 29, 2015. The meeting will be held at the **State Capitol Building, 1005 East Grand Avenue, Room 19, Des Moines, IA 50319.**

The tentative agenda for the meeting is as follows:

10:00 a.m. Call to Order

1. Approval of Prior Board Minutes
2. Closed Session Discussion of Pending and Imminent Litigation (To adjourn by 10:30 am)
3. Public Comment Period
4. Board Issues
 - A. Conceptual Plan for Termination of the Iowa Comprehensive Petroleum Underground Storage Fund
 - B. Fiscal Year 2016, 1st Quarter Legislative Report
 - C. USTCA Closure Contract, Corrective Action on Non-Eligible Sites
 - D. DNR Update
5. Approval of Program Billings
6. Monthly Activity Report and Financials Reviewed
7. Attorney General's Report
8. Claim Payment Approval
9. Contracts Entered Into Since September 24, 2015 Board Meeting
10. Other Issues as Presented
11. Correspondence and Attachments
12. Claim Information

Approval of Prior Board Minutes



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MINUTES

IOWA COMPREHENSIVE PETROLEUM UNDERGROUND STORAGE TANK FUND PROGRAM

SEPTEMBER 24, 2015

STATE CAPITOL BUILDING
1005 EAST GRAND AVENUE, ROOM 19
DES MOINES, IOWA

Doug Beech, Board Chair, called the Iowa UST Fund Board meeting to order at 10:00 A.M. A quorum was present, with the following Board members present:

Joseph Barry
Patricia Beck
Tim Hall (for Chuck Gipp)
Kurt Mumm
Adam Phillips (for Michael Fitzgerald)

Also present were:

Dale Cira, Administrator
James Gastineau, Deputy Administrator
Elaine Douskey, Iowa Department of Natural Resources

APPROVAL OF PRIOR BOARD MINUTES

Mr. Beech inquired if the members had reviewed the minutes and if there were any items for discussion. Mr. Barry motioned to approve the minutes of the August 27, 2015 meeting and Mr. Mumm seconded the motion. The minutes were approved unanimously.

CLOSED SESSION

Mr. Beech noted there were no matters dealing with litigation for discussion in closed session pursuant to Iowa Code Chapter 21.

PUBLIC COMMENT

No public comments were presented.

BOARD ISSUES

A. Aon Contract Renewal

In presenting information for this item, it was noted that Mr. Steward, Department of Justice, provided the proposed contract language to all Board members prior to the meeting. In considering the item, Mr. Beech recalled that during the last renewal of Aon's contract, Aon had voluntarily reduced its compensation and that the proposed agreement would be a 3.5 percent increase based on the reduced compensation rate. Mr. Beech then inquired if there was any discussion.

Mr. Cirra added the previous decrease in compensation resulted from a reduction in the innocent landowner and remedial claims structure which reduced the overall monthly fee. He also noted that for the next extension cycle, it is anticipated that there will be considerable more effort involved to work through the closure of the program, develop positions for possible loss portfolio transfers and complete settlements with claimants. From Aon's perspective, while the claims continue to decline more effort will be needed to work toward the program closure.

Ms. Andeweg joined the meeting in progress at 10:05 a.m.

Mr. Beech added that this renewal would extend the Aon contract to December 31, 2016.

Ms. Beck moved to approve the contract renewal as presented and Mr. Mumm seconded the motion. The motion was approved unanimously.

B. Reauthorization of CRPCA 1007-40: Akron Contractor Agreement

Mr. Gastineau reported this is a request for a contract extension for a State Lead Project involving the City of Akron. The project involves two sites in the City with commingled contaminant plumes in proximity to the municipal water supply wells. He noted that the contamination from the sites is being addressed using an ozone injection system to stimulate biodegradation of the contaminants. The contract, with Geotek Engineering & Testing Services, Inc. has been in effect since 2010 and is currently set to expire in December 2015. Mr. Gastineau noted he is seeking authorization to extend the contract for one final year through December 2016.

Mr. Hall moved to approve the reauthorization of the contractor agreement and Ms. Andeweg seconded the motion. The motion was approved unanimously.

C. DNR Update

Ms. Douskey indicated there was no report this month.

PROGRAM BILLINGS

Mr. Gastineau presented the current monthly billings to the Board for approval.

- 1. Aon Risk Services..... \$97,838.00
 Consulting Services October 2015 -- \$58,838.00
 Claims Processing Services October 2015 -- \$39,000.00

- 2. Iowa Attorney General’s Office..... \$6,201.21
 Services provided for Underground Storage Tank Program
 July-August 2015 (FY 2015) Billing

Ms. Andeweg moved to approve the billings as presented. Mr. Hall seconded the motion. Motion carried unanimously.

MONTHLY ACTIVITY REPORT

Mr. Gastineau provided a brief overview of the Monthly Activities Report. He noted the number of remedial claims declined by one but noted two new NFA reopener project claims. For the financials, he reported nothing of significance and noted that \$1.18 million was paid out in claims for the first two months of the fiscal year.

Mr. Gastineau identified one addition has been made to the Lien Status Update. He explained a letter was sent to an owner where underground storage tanks had been removed by the State Lead Closure contractor. He noted that the Program provides up to \$15,000 for an eligible tank removal however an owner is responsible for anything above that amount. In this case, the owner has agreed to start a payment plan at the rate of \$1,000 per month to pay off the balance due. Mr. Gastineau noted that the payment plan will be complete in January 2016.

ATTORNEY GENERAL’S REPORT

There was no representation from the Attorney General’s office.

CLAIM PAYMENT AUTHORITY

Mr. Gastineau presented the following claim authority requests:

- 1. Site Registration 8600056 – Innovative Ag Services, Luana (3rd Board Report)**

The site is classified high risk for the water line pathway and low risk for the potential vapor pathways. An excavation was completed in October 2014 and appears to have been mostly successful. The concrete has not been replaced but that will be completed this fall. It was noted that some contamination remains however a proposed excavation will remove that and will potentially reclassify the site to a no-action required status. However, if groundwater

concentrations rebound or the soil still exceeds the target levels, a section of water main in proximity to the contamination may need to be replaced before reclassification.

Mr. Gastineau noted the present claim reserve is \$270,000; prior approval for costs up to \$250,000 was previously granted. Total costs incurred to date are \$240,480.18 and projected costs are \$35,000 to \$100,000+ for new activities. Additional authority of \$75,000 was requested for a total authority of \$325,000.

Ms. Andeweg moved to approve the request and Ms. Beck seconded the motion. Motion carried unanimously.

2. Site Registration 8609145 – Almac, Inc., Oskaloosa (1st Board Report)

This is a non-granular bedrock site, low risk for the protected groundwater source pathway. The City of Oskaloosa has a well ordinance but Mahaska County will not sign the DNR required documents to use the ordinance as an institutional control. The consultant is recommending a Tier 3 approach to be used in lieu of the normal bedrock rules in an attempt to reclassify the site using an environmental covenant on the property. The DNR project manager has agreed that this approach may be considered for possible closure.

Mr. Gastineau noted the present claim reserve is \$100,000. Total costs to date are \$71,378.65 and projected costs are \$25,000 to \$50,000+ for further activities. Additional authority was requested for a total authority of \$115,000.

Mr. Mumm moved to approve the request and Ms. Andeweg (?) seconded the motion. Motion carried unanimously.

3. Site Registration 8600318 – Sunrise Service, Des Moines (2nd Board Report)

This site is classified as high risk for the vapor and water line pathways. Free product is also present in an area which was not part of an excavation completed in 2002. The free product plume has recently been delineated using laser induced fluorescence (LIF). The recommended approach to closing this claim is to excavate the area of free product based on the LIF delineation results.

Mr. Gastineau noted the present claim reserve is \$250,000. Total costs to date are \$122,822.90 and projected costs are \$125,000 to \$175,000+ for further activities. Additional authority was requested for a total authority of \$275,000.

Ms. Andeweg moved to approve the request and Mr. Barry seconded the motion. Motion carried unanimously.

CONTRACTS ENTERED INTO SINCE THE AUGUST 27, 2015 BOARD MEETING

No contracts were entered into since the August 27, 2015 Board Meeting.

OTHER ISSUES

Mr. Hall inquired on the plan for the October meeting. Mr. Cira indicated that the Administrator's Office was charged with coming up with a concept towards program closure with certain working assumptions that the Program would wind down by 2018. A plan will be presented towards reducing the number of claims, identifying those claims eligible for possible loss portfolio transfer, those for possible settlement agreements and a process and prediction for "the final countdown" from where we are now and where we may be by or before ending in 2018.

Mr. Gastineau added that he had met with Iowa Finance Authority to start a discussion of options and had invited their legal counsel to the October 29 Board meeting. He also noted his understanding that the Department of Transportation has already started to develop language for a legislative bill in regard to the funding and that discussions have started about setting aside some money for the Iowa Finance Authority for potential future claims and NFA reopener claims. Mr. Gastineau also commented that the draft letter he had sent to the Board members has been reviewed by Mr. Stewart and will be used to prompt the owners of the stalled sites. He surmised that 40 to 50 claims might close after the letters are issued. He also noted that the sites that are closed, along with other sites that are not funded, will require action at some point and as such money should be set aside for that function. Mr. Hall responded that the Department of Transportation is interested in closing down the standing appropriation from the Statutory Allocations Fund that comes to the Board as soon as the EPC collection ends. Mr. Beech stated that the Board needs to be prepared for that discussion and that perhaps stakeholders may have the desire to plan counter legislation following the next Board meeting.

CORRESPONDENCE AND ATTACHMENTS

Mr. Beech indicated the correspondence and attachments could be read after the meeting adjourns.

Mr. Barry motioned to adjourn the meeting at 10:22 A.M. and Mr. Mumm seconded the motion. The measure passed with a unanimous vote.

Respectfully Submitted,



James Gastineau
Deputy Administrator

Closed Session

Discussion of Pending and Imminent Litigation

Public Comment

Board Issues

**A. Conceptual Plan for Termination of the
Iowa Comprehensive Petroleum
Underground Storage Tank Fund**



IOWA UNDERGROUND STORAGE TANK FUND

Douglas M. Beech, *Chairperson*

Dale T. Cira, *Administrator*

Board Members: Michael L. Fitzgerald Joseph D. Barry Jeff. W. Robinson Karen E. Andeweg Chuck Gipp
 Timothy L. Gartin Dawn M. Carlson Patricia J. Beck N. Kurt Mumm

MEMORANDUM

TO: UST Board Members
FROM: Dale Cira
DATE: October 20, 2015
SUBJECT: Conceptual Plan for Termination of Iowa Comprehensive Petroleum
Underground Storage Tank Fund

Attached to this Memorandum are the details of a Conceptual Plan to terminate the current Iowa Comprehensive Petroleum Underground Storage Tank Program Fund. The Board instructed the Administrator to develop and propose a concept plan to bring the program and Fund to termination for consideration by the Board for comment and implementation. This termination is being sought at the direction of the Governor Branstad in his July 2, 2015 veto message to House File 652.

To develop this plan, the Administrator considered the following basic assumptions that are detailed in the plan:

1. The program will be allowed to continue to operate to close claims through Fiscal Year 2017 (June 30, 2017) or Calendar year 2017.
2. The funding to the Board for the program will cease June 30, 2016.
3. Reserves as calculated by the Administrator and outside actuarial review will hold as estimated. The reserve estimate currently is set at \$26,563,234. The current Fund balance is \$36,188,289.
4. The Board will be dissolved at the conclusion of the Fund and program.
5. Termination of the fund requires the closure (through normal process or administrative tools) of the remaining claims – currently estimated to be 498.

Proposed Concepts to Termination

By April 1, 2016, the Administrator estimates 360 claims will remain in the program for closure through continued normal process or administrative means, including settlement and liability portfolio transfer (LPT). Over the next 18 to 24 months, the process to terminate the program is summarized in some detail and includes the steps below:

1. Contact Inactive and Stalled Site Claimants for Participation
2. Establish the date where no further claims will be accepted to the Program
3. Develop a Liability Portfolio Transfer (LPT) with Petroleum Marketers Management Insurance Corp (PMMIC)
4. Identify and Offer Settlement Agreements to Eligible Claimants
5. Establish the requirements of a Liability Portfolio Transfer agreement and identify and engage a third-party Insurance Carrier or Liability Transfer Firm to transfer the bulk of the remaining sites.
6. Establish a state fund and move remaining sites to a default Combined DNR/Iowa Finance Authority (IFA) Program

There are many other important components to the Plan to terminate the Fund and Program and those issues are highlighted in the attached Plan. The concept described in the attached Plan is intended for discussion by the Board and public for input. This process will be further developed and implemented upon the review and authorization of the Board, and where necessary, approval of the Iowa legislature.

Conceptual Plan for Termination of the Iowa Comprehensive Petroleum Underground Storage Tank Fund

Goal:

To terminate the Iowa Comprehensive Petroleum Underground Storage Tank Fund Program (Fund), UST Fund and UST Fund Board by elimination of liabilities.

The cessation of the UST Fund Program has been an item for discussion for years and was most recently brought forth in Governor Branstad's veto message issued July 2, 2015 in regard to House File 652, in which he stated that the "State of Iowa and the UST Fund Board should work together to complete action on the remaining liabilities of the UST Fund". Following that message, the Board instructed the Administrator to develop and propose a concept plan to bring the program to a close. This paper outlines the concept plan for consideration and comment by the Board, and where appropriate, for implementation.

Background:

The UST Fund program was created in 1989 to assist owners and operators of petroleum underground storage tanks (USTs) comply with State and Federal environmental regulations. The main purpose of the program was to provide financial assistance for the cleanup of pre-existing releases to minimize societal and environmental damage, create a financial responsibility assurance mechanism (insurance) to pay for future releases and to provide loan financing for UST locations.

Through the operation of the program the Legislature has made changes, diverted monies and tasked the Board with projects outside that original scope. One of the earliest changes was a modification of the source of funding. Originally, the UST Fund was to receive the Environmental Protection Charge (EPC) a fee on petroleum diminution. In 1990, the source of monies for the UST Fund was changed to receive portions of the automobile use tax; the EPC was then directed to the Road Use Tax Fund (RUTF). In 2008, following changes to the RUTF, the main source of funding was shifted to the Statutory Allocations Fund (SAF) which derives its monies from driver's license fees, trailer registration fees, etc. In FY 2015, the EPC fee deposits to the RUTF were approximately \$21.6M, while the UST Fund received \$14M from the Statutory Allocations Fund.

The EPC sunset date of June 30, 2016 is fast approaching and while the sunset date does not eliminate funding for the UST Fund Program, the two revenues have long been believed to be tied together and even today, many still believe that the UST Fund receives the dollars generated by the EPC. The ending of the EPC will reduce funding to the RUTF and as the excess monies from SAF are deposited into the RUTF, the two are in a sense linked. It has also been long believed that as the EPC fee sunsets, funding

to the UST Fund program will also cease thus considerations have been in discussion for a number of years on how to end the Program near the sunset date of June 30, 2016.

Conceptual Plan:

To terminate the existing Fund requires closing the remaining claims and limiting new claims that may come to light (prior to a yet to be determined cut-off date) through a mix of the normal closure processes and administrative tools. During the move to cease operations, the base function to provide funding for assessment and corrective action work will continue in an effort to meet the mission of the program and that of the Iowa Department of Natural Resources (IDNR) to ensure protection of human health, public safety, and the environment.

The cessation will require a thorough review of the program liabilities. Current liabilities include open remedial fund (retroactive and remedial) claims, innocent landowner fund claims, and State Lead project claims. A summary of these liabilities is routinely presented for review on the monthly activities report. The estimated liabilities for all claims, as of September 30, 2015 are \$29,056, 511.

Working Assumptions

The Fund receives \$14 million annually from Statutory Allocations Fund (SAF) as provided in Iowa Code section 321.45. It is assumed that funding will continue through FY 2016 with an additional \$10.5 million to be allocated before June 30, 2016. Based on program reserve practices and confirmed by the actuarial study completed in FY 2015, the Fund is predicted to have sufficient resources to address the outstanding claims with projections through 2020. However, consistent with Board direction, the timetable has been moved up to address these outstanding claims before the end of fiscal year 2017.

The UST Fund program provides benefits through several programs. The primary claim programs provide financial assistance directly to claimants for the cleanup of pre-existing releases. Two secondary programs available to claimants provide financial assistance for copayment reimbursements and financial assistance for the removal of underground storage tank systems.

The UST Fund program also provides assistance to the IDNR through three main programs: a State Lead project for funding of work on select eligible and non-eligible UST sites; a community remediation program, and a program to provide funding where work is needed to re-assess a site following the issuance of a No Further Action certificate.

The primary UST Fund program claims are those pertaining to the cleanup of pre-existing releases, including those sites that have been re-opened. The number of primary claims, as of September 30, 2015 totals 498 claims. Since 2000, the number of open claims has steadily declined and it is assumed the number of claims will continue to decline at a rate of approximately 80 claims annually to a point where only a limited number of claims remain. In addition, it is assumed that the number of new claims will continue to be at a low and predictable rate.

Other working assumptions include:

1. Reserves as calculated by the Administrator and outside actuarial review will hold as estimated. The reserve estimate for the primary claims, as of September 30, 2015, is currently at \$26,563,234. The current Fund balance is \$36,188,289.
2. The program will be allowed to continue to operate to close claims through Fiscal Year 2017.
3. Post-program termination activities will be completed by the end of calendar year 2017.
4. The Board will be dissolved by repealing of Iowa Code 455G at the conclusion of the program.

Termination of the UST Fund program requires ending liabilities to the State of Iowa and to the UST Fund. This will require the closure (through normal process or administrative tools) of the remaining primary claims and termination of secondary programs. As discussed in previous workshops and Board meetings, not all claims are actively engaged due to issues such as ownership, access, and uncertainty. Regardless, the goal will be to close out as many claims as possible prior to the Fund termination.

Termination will also require ending the acceptance of any new claims to the UST Fund, including claims for pre-existing releases and claims by governmental entities. Secondary claim programs currently available to claimants may also be terminated. Claim programs provided to the IDNR will need to be terminated, with the one exception of the funding mechanism provided for the re-evaluation of sites issued a No Further Action certificate. This funding will need to be restructured and assigned to the post-closure receiving State program to provide resources to continue as a 'safety-net' for the State.

Claim Information

For an understanding of the claim status, the following information is provided for reference. The data, developed as of September 30, 2015 includes current data from the Iowa DNR and Iowa UST Fund.

	DNR Open LUST Sites	UST FUND Primary Claims	FUND RESERVE BALANCES
Site Classification	766	498	\$ 26,563,234.12
High Risk	431	298	\$ 20,463,568.05
Low Risk	167	108	\$ 2,970,232.69
No Action w/Free Product	67	38	\$ 1,734,143.37
Not Classified	101	18	\$ 671,814.10
No Action Required		31	\$ 568,710.79
Community Projects		5	\$ 154,765.12
Total	766	498	\$ 26,563,234.12
Total (-NAR, CRP)		462	\$ 25,839,758.21

Proposed Concepts to Termination:

Through previous work group sessions and Board meetings, a concept for termination of the program and Fund has been developed and discussed. Below is a detailed summary of the steps and schedule proposed to implement this plan.

By April 1, 2016, the Administrator estimates 360 claims (excluding claims with NAR classification) will remain in the program for closure through continued normal process or administrative means, including settlement and liability portfolio transfer (LPT). These are summarized below. However, depending on the timing and process, some of these claims may also be eligible for closure through settlement of LPT, described further below.

1. Contact Inactive and Stalled Site Claimants for Participation

A challenge to the successful closure of claims has been the inability to locate responsible claimants. Even when identified, a few claimants are not inclined or not able to participate in the program to conduct the required investigation and corrective action activities, despite the availability of funding. To identify and address these inactive or stalled claims, and in an effort to encourage participation, the Administrator drafted and has begun sending letters to individuals of record to seek their involvement with a claim or risk administrative closure of their claim. To date, letters have been issued to the claimants for 35 sites. Letters will continue to be issued through the end of 2015 to all inactive sites including those currently included in the State Lead claim programs. It is estimated that up to 60% (55 claims) will be administratively closed due to non-participation and best efforts at tracking claimants by March 31, 2016.

2. Limited Loss Portfolio Transfer (LPT) with Petroleum Marketers Management Insurance Company (PMMIC)

The Administrator has identified 14 sites where both the Fund and PMMIC share liability over claims on the same site. Third-party evaluations have been completed on these sites however new evaluations are planned for a few other sites to determine appropriate participation levels between the Fund and PMMIC in the sharing of costs. In order to complete a transfer, the Administrator will work with PMMIC to establish an equitable reserve calculation and propose a transfer of liability and reserve funding for those sites to PMMIC. Efforts will be made to quickly determine those participation levels and confirm agreements with PMMIC to achieve closure as quickly as possible. This would effectively terminate UST Fund action on 14 claims and transfer the duty to reimburse to a party that will work to close out the claim through their established processes. It is anticipated that the limited LPT would be complete by April 30, 2016.

3. Identify and Offer Settlement Agreements

The Board has settled individual and groups of claims for claimants in certain circumstances over the history of the program. In exchange for an agreed upon lump sum payment the claimant releases the Board from their duty to reimburse in the future for any and all claims. Based on the Administrator's review of the open claims, it is estimated there are up to 77 claims that are eligible to be consolidated into possible settlement agreements. These claims include those claimants who are active in responding to DNR requirements and have three or more eligible claims. In order to implement this concept, the

Administrator's office will issue letters to the prospective claimants by December 15, 2015 seeking their input on a possible settlement. If interested, we would expect to negotiate terms where a reserve amount will be proposed to the entity to allow them to continue working to properly close the claim to meet the requirements of the IDNR. Each entity will be subject to the terms of the Agreement for continuation of work and closure but with oversight from DNR. Assuming moderate success in this effort, it is estimated 40 claims could be removed from the current claim list.

In addition to those claimants with multiple claims, it is conceivable that owners and operators holding claim for one site may wish to pursue the option of a settlement. While technically feasible, this approach presents several concerns. While a settlement would provide for the closure of a claim for a finite cost, it is a risk that a claimant may not be able to satisfy. While some claimants may close their sites for less than the settlement amount, others may not and would still be responsible to meet IDNR requirements for closure regardless of whether the funds remain or not. Additionally, while it would not be the Board's expectation, there is also the chance that a claimant who settles for a lump sum may not complete the work and just keep the settlement monies. Both of these pose serious downsides for this option in regard to the Board's intent to ensure the funds are provided to meet the DNR's environmental goals.

4. Third-party Insurance or Liability Transfer Firm

The remaining universe of claims, to be determined after using other normal process and administrative tools is currently estimated at 360 claims, although possible exclusions are identified in section 5, below.

The claims remaining for this group will include a combination of all classified and unclassified sites. The claims currently managed by the Fund could be consolidated into a portfolio to be managed by a third-party. This Loss Portfolio Transfer (LPT) approach has been used successfully on a subset of sites in the past with PMMIC. For purposes of this discussion, the remaining sites that qualify for inclusion on such a transfer would then be removed from further responsibility and deemed administratively closed by the Fund. To accommodate this LPT, funding would be transferred to the third-party liability company (an insurance company or other specialized risk-transfer company) to complete the required remediation to the terms of the agreement.

Determining the appropriate terms of the agreement will be a major consideration prior to issuing a Request for Proposal. Considerations will need to include a moral hazard provision to ensure appropriate handling of State Funds to facilitate closure of the claim sites in a manner consistent with the DNR environmental goals and within an appropriate time frame established by the Board. If closure is not attained or if the claims stall, a claw-back provision could be included to have the site addressed by the State at a later date.

Under this scenario the Board would pay a lump sum to the third party who would assume all outstanding liabilities for the claims, as defined in Iowa Code sections 455G.9 and 455G.21, to be transferred. The dollar amount of such a transfer would be a function of outstanding reserves, the perceived risk of change in those reserves over time, and other administration costs. A third-party specialty environmental insurance carrier or transfer firm would respond to claims within defined

parameters and limits. The challenges with this approach will be to provide some level of confidence regarding the number and size of claims that may result; establishing the moral hazard boundary between the interests of the DNR and the availability of coverage; obtaining a bid for an implementable program from the private insurance market or transfer firm.

Exercising this component of the termination plan will be a key component of the Fund sunset and will account for Fund closure of the vast majority of open claims. It will also require transfer of significant funds from the current program that will no longer be available for other sites. A premium will also be calculated into this transaction. Steps necessary to facilitate this LPT will include:

- Review and evaluate the sites eligible for LPT by identifying those with a likely closure date beyond 2016 and confirming the necessary reserves (complete by June 1, 2016).
- Prepare a draft agreement to facilitate the LPT (complete by June 1, 2016).
- Prepare a Request for Proposal (RFP) to solicit interested third-parties (by August 1, 2016).
- Receive and review bids (October – December 2016).
- Negotiate and award the final LPT (by March 15, 2017).

Following a transfer of the claims pursuant to a LPT, the Board would have no further duty to pay for activities on that claim or a duty to maintain a claim file, except as required for State record retention requirements. By June 30, 2017, all records should be transferred to the receiving State entity.

LPT Groups

During the last two months, questions have been presented to various stakeholders seeking input on how to potentially group claims to provide a distinction in developing more than one LPT. A review of the open claims indicates no significant common thread to allow for a simple grouping. A review of the claim locations, as of September 30, 2015 indicates the claims are located throughout the State, with greater concentrations in eastern Iowa, see below:

CLAIMS BY DNR FIELD OFFICES

FO #	High Risk	Low Risk	NAR-FP	Not Classified	FO –Total
1	82	28	3	3	116
2	34	10	3	3	50
3	26	7	13	2	48
4	47	23	5	5	80
5	44	14	4	1	63
6	65	26	10	4	105
Total	298	108	38	18	462

The data table provides information on the location of 462 Open Claims, excluding the 31 claims associated with sites classified No Action Required and the 5 State Lead CRP claims. It is conceivable that the claims could be divided on a geographical basis in a north (FO 1-3) to south (FO 4-6) grouping

with 214 and 248 claims respectively. However, given the significant variations among the claim sites, it is recommended one group of all open and active claims as of June 1, 2016 be considered for the LPT.

5. Default Combined DNR/Iowa Finance Authority (IFA)

In addition to claims closed by an administrative measure, there are additional claims that may be deemed unqualified for a LPT, either to protect the interests of the State or the interests of the LPT bidder. Claims that fall into this group may include:

- a) Claims unlikely to close due to insufficient funding, which may include: claims anticipated to exceed the \$1 million statutory funding cap and claims partially funded pursuant to a settlement agreement or partial denial of funding (estimated 15 claims).
- b) Claims classified No Action Required where free product remains. This category may be considered for exemption due to planned rule modifications which may allow the DNR greater flexibility to closing such sites (estimated at 15 claims).
- c) Claims classified No Action Required, where only final well closure and payment of outstanding invoices remain (estimated at 30 claims).

The Administrator will maintain a file of the claims closed by administrative means during the termination process. For many of the claims, the identity of the responsible party is not known thus the IDNR may have no one to hold accountable to address the UST contamination. The sites associated with these claims, in addition to other non-funded sites may remain open as an environmental concern for an indefinite timeframe.

Funds remaining following normal closure, LPTs, and settlement agreements could be transitioned to the Iowa Finance Authority for management under the supervision and implementation of the IDNR. Additional funding, if any, provided to the UST Fund after June 30, 2016 could also be segregated for this purpose. This would be an extension, albeit much smaller in scope and financial demand, than the current Fund. Funds for this category could also be transferred from the current Fund as a foundation to manage the State Lead program claims for site re-opened following issuance of a No Further Action certificate, claims closed by administrative means, and other non-funded sites. Some of the same challenges exist with this approach: establishing the moral hazard boundary between the interests of the IDNR and the availability of funds; and securing a continuing source of funding to address developing and future claims.

Legislative and Rule Making Implications

The Iowa UST Program, UST Fund, and UST Fund Board were created in HF 447 (Petroleum Underground Storage Tank Act of 1989). The program is codified in Iowa Code 455G and rules are adopted in Iowa Administrative Code chapter 591. In order to terminate the Program liabilities, several modifications will be required including, but not limited to, the following:

- Iowa Code 455G.3 provides for the creation of the UST Fund and allows for the creation of individual accounts used for the distinct purposes, such as the remedial account, the loan guarantee account, and the marketability fund for the funding of innocent landowner claims.

If a separate fund is created to provide funding for the Department it is recommended that a fund be created that can be separate from the General Fund potentially to be managed by the Treasurer of the State, as provided in 455G.3 in regard to the UST Fund.

- Iowa Code 455G.3 provides for non-claim related program liabilities including annual appropriations to the DNR for technical reviews (\$200,000), to the Department of Agriculture and Land Stewardship for fuel quality inspections (\$250,000), and for administration of a reimbursement program to provide owners with UST operator training (\$250,000). A determination is needed as to the necessity of these liabilities and if to be continued, a mechanism to fund the liabilities must be determined.
- Iowa Code 455G.6(17) and Iowa Administrative Code (591) Chapter 9 provides the structure for the Board to transfer all or a portion of the liabilities through a loss portfolio transfer (LPT). Pursuant to the regulations, the Board's duty to reimburse a claimant is terminated following the transfer of the claim through a LPT.
- Iowa Code 455G.9 provides the duty for monies in the remedial account to pay for any eligible claim made under that section. Unless repealed or modified, the Board may have a statutory obligation to provide for payment of any claims made pursuant to Iowa Code 455G.9 and 455G.21 not transferred or for those claims made after a loss portfolio transfer. Claims provided under this section include:
 - Remedial (governmental) claims including claims for contamination encountered during repair or improvement of a utility or public improvement, claims for properties acquired by tax deed, or claims for properties acquired by eminent domain.
 - Tank closure claims that provide up to \$15,000 for the removal of an underground storage tank system.
 - Innocent Landowner claims including late filed remedial claims, acquired property claims, and pre-regulation claims. New claims in this series can be terminated by a change of rule.
- Iowa Code 455G.9(1)(k) as currently written requires an agreement between the Board and IDNR in order to provide funds for the assessment and corrective action activities required to re-evaluate a site following the issuance of a No Further Action certificate. This provision was created to provide a 'safety-net' for owners, operators, and the IDNR to ensure that funding is available to assist the IDNR should an unforeseeable event occur at a closed UST site. This provision should be rewritten to ensure the safety-net remains viable for the future.

- Iowa Code 455G.13 provides the cost recovery enforcement. Liens have been filed on properties throughout the State as a means of attaining the recovery of funds paid for corrective action work on non-eligible sites. A determination must be made on the disposition of the liens.

Impacts on Reserves and Available Funds

As of September 30, 2015, the available balance of the Iowa UST Fund is \$36,188,289. The reserve for the primary claims is \$26,563,234, while total liability for all claims types is \$29,056,511. For the remainder of fiscal year 2016, it is anticipated additional revenues to the UST Fund will be approximately \$10.6 million and expenditures for claims and administrative costs will approach \$10.0 million, thus indicating an ending balance near \$36.6 million.

Based on the analysis of the stalled claims for which activities are currently being pursued, the estimated reserves will be reduced by approximately \$1.5 million. Changes will continue to be noted for the remaining and ending liabilities are estimated to be approximately \$22.0 million at the end of FY 16.

The following table provides information on the reserves for each claim type currently in use:

Claim Type	
Retroactive Claims (26 claims)	\$1,356,648.54
Remedial (346 claims)	\$19,153,769.66
Innocent Landowner (113 claims)	\$5,811,717.41
Global Settlement (73 claims)	\$360,573.48
NFA Re-Opener (13 projects)	\$241,098.51
State Lead Closure Contract (73 claims)	\$1,830,746.71
Tank Closure (31 claims)	\$301,957.00
	\$29,056,511.31

Other Considerations

The Iowa UST Program has historically provided benefits to UST owners and operators, landowners, and to State entities. The legislative intent identified in the preamble of HF 447 was to assist UST owners and operators, especially small businesses, comply with Federal technical and financial responsibility standards. HF 447 also recognized the importance that the UST Fund Program be an interim measure, be available to minimize societal costs and environmental damage, and be available to maintain Iowa's rural petroleum distribution network. Upon cessation of the UST Fund Program, many benefits created to advance these measures may be lost.

As an alternative to closing of the UST Fund Program in its entirety, the State of Iowa may choose an alternate approach to maintain a Fund and a State Program. Program administration could be maintained using an independent entity or may be transferred to a State entity, such as the Iowa DNR and/or Iowa Finance Authority. If internalized as a State function, the receiving State entity would likely require additional administration costs for added staffing and facilities. If administration remains

outsourced, administrative costs should decrease considerably as the claims are reduced although such costs cannot be eliminated. Benefits of maintaining administration by an independent party would include reducing the need to retain additional State staff and it may provide greater transparency on identifying overall program costs.

As sufficient funds appear to exist based on the current reserves and as supported by the actuarial review, maintaining a State Fund may allow the continuation of both the primary and secondary programs to the benefit the State and UST owners and operators, potentially reducing the effects of the stalled claims on society. If no additional funding is provided, the proposed changes to curtail non-claim related liabilities identified in Iowa Code 455G.3 and to restrict new claims would likely need to be considered.

Records Retention

The Iowa UST Program has been in existence for more than 26 years and as a result has accumulated various records documenting the history of the Program. The State of Iowa requires certain records to be maintained indefinitely while other records may be disposed of following an approved schedule. Prior to the cessation of the UST Fund program, a determination must be made as to the final disposition of all written and electronic records of the Program. It may be necessary to allocate a period of time to provide for the transfer of documents and the establishment of a pool of funds to pay for continued storage and for the final disposal of the program records.

B. FY 2016, 1st Quarter Legislative Report

UST Fund Program Status Areas 1Q FY2016 (Sept 30, 2015)

1. Financial Balances

	9/30/2015	6/30/2015	6/30/2014	6/30/2013	6/30/2012
Revenue Fund	\$4,042,658	\$538,282	\$524,210	\$14,470,480	\$16,326,235
Unassigned Revenue Fund	\$8,930,574	\$9,417,609	\$11,681,366	\$8,133,085	\$745,123
Remedial Fund	\$15,675,514	\$16,834,688	\$8,681,846	\$4,347,071	\$3,510,808
Marketability Fund	\$797,863	\$787,670	\$755,308	\$742,024	\$730,433
Innocent Landowner Fund	\$6,741,677	\$7,110,415	\$8,604,467	\$2,176,164	\$2,963,372
Loan Guarantee Fund	\$ -0-	\$ -0-	\$ -0-	\$ -0-	\$277,723
Capital Reserve Funds	\$ -0-	\$ -0-	\$ -0-	\$ -0-	\$ -0-
Total Fund Balances	\$36,188,289	\$34,668,664	\$30,247,200	\$29,868,825	\$24,553,694

Previous and Pending Transfers

FY2007--\$3.5 million
 FY2008--\$6.5 million
 FY2009--\$4.9 million
 FY2011--\$26.4 million
 FY2012--\$3 million

Paid on Claims

\$ 6.6 million FY2012
 \$ 7.6 million FY 2013
 \$10.1 million FY 2014
 \$ 7.6 million FY 2015

2. Operational Changes

- Claim counts trending downward
- Actively pursuing claimants seeking their participation toward attainment of a no action required status.
- Focus on remaining mission to complete action on pre-existing liabilities using available funds

Expected Results

- Continued reduction of claim count
- Determination of options to conclude program liabilities

3. Results - - Iowa DNR LUST Sites / Risk Classifications in relation to Open UST Fund claims

Iowa DNR / Iowa UST Site Data (as of 9/30/15)	DNR LUST Sites	Remedial CRP/NFA claims	Retroactive claims	Innocent Landowner	Total Claims
Total LUST Sites	6615				
Total Active LUST Sites	766	359	26	113	498
Sites "Not Classified"	101	3	0	15	18
Low Risk sites	167	80	5	23	108
High Risk sites	431	229	18	56	303
No Action with free product sites	67	27	2	9	38
No Action Required	5729	20	1	10	31

4. Results - - UST Fund Open Claims / Liabilities

	Sept. 30, 2015	Sept 30 2015	June 2015	June 2014	June 2013	June 2012	June 2011	June 2010
Retroactive Claims	\$ 1.4 million	26	26	31	36	39	44	54
Remedial/CRP/ NFA Claims	\$ 19.4 million	359	375	414	481	532	609	712
Innocent Landowner Claims	\$ 5.4 million	115	120	140	153	162	187	206
Totals *	\$ 26.4 million	498	521	585	733	840	972	1,045

*does not include State Lead and tank closure claims

**C. USTCA Closure Contract, Corrective
Action on Non-Eligible Sites**



IOWA UNDERGROUND STORAGE TANK FUND

Douglas M. Beech, *Chairperson*

Dale Cira, *Administrator*

Board Members: Michael L. Fitzgerald Joseph D. Barry Jeff. W. Robinson Karen E. Andeweg Chuck Gipp
 Timothy L. Gartin Dawn M. Carlson Patricia J. Beck N. Kurt Mumm

MEMORANDUM

TO: UST Board Members
FROM: James Gastineau
DATE: October 20, 2015
SUBJECT: USTCA Closure Contract – Corrective Action on Non-Eligible Sites

Background

The Board and Department have entered multiple 28E agreements since the mid-1990's to conduct activities at sites where there is no responsible party able to pay, the responsible party cannot be found, or the responsible party is recalcitrant in undertaking the corrective action measures. The 2010 agreement also allows work to be performed on fund eligible sites and allows for limited corrective action work to be completed.

Currently, 62 sites have been identified for the Closure Contract. Forty-seven (47) are eligible. Several sites have closed with limited work however some are determined to have high or low risk conditions. Corrective actions, such as excavations and water line replacement, have been completed on a few of the fund eligible sites. Following work, costs are transferred to the fund eligible claims in order to preserve the funding limit authorized by the Board for the USTCA project.

The question now presented is should the Fund pay for corrective actions at non-eligible sites? Historically, the Board has been paid for such action when contamination is commingled with an eligible claim or at the Department's specific request. Cost recovery is pursued if a responsible party owns the site; in most cases, the landowner is not the responsible party for the contamination causing the risk.

Site Consideration

The Department has requested limited corrective action on a site assessed under the State Lead Closure Contract. The location is the current Casey's site in Afton, IA (LUST # 9LTM39).

This site has a long UST history; the original tank system installed in the 1960's was removed in 1988, with new tanks installed the same year. Casey's acquired the site in 2005 then removed the existing USTs before installing the newest tank system.

Contamination was discovered in 1990, excavated then given a no action required letter. In 2005 contamination was discovered following the removal of the tanks initiating the assessment requirements. Following the investigation, it was determined that the source of the risks emanated from the original pre-1990 tank system thus the current landowner is not the responsible party for the release. The site does not qualify as a NFA re-opener since the original release and closure pre-dates the NFA certificate process. The site was added to the closure contract to assess the extent of contamination and if possible, remove the risks.

The State Lead consultant for the project has provided an estimate for the requested work which is to remedy the risk to the water lines in the site area. Projected costs for an excavation and water line replacement are estimated at \$180,000. It is requested the Board authorize costs up to \$200,000 for this work and for post-excavation monitoring.

D. DNR Update

Approval of Program Billings



IOWA UNDERGROUND STORAGE TANK FUND

Douglas M. Beech, *Chairperson*

Dale T. Cira, *Administrator*

Board Members: Michael L. Fitzgerald Joseph D. Barry Jeff. W. Robinson Karen E. Andeweg Chuck Gipp
 Timothy L. Gartin Dawn M. Carlson Patricia J. Beck N. Kurt Mumm

MEMORANDUM

TO: UST Board Members
FROM: James Gastineau
DATE: October 21, 2015
SUBJECT: Summary of Bills for Payment

NOTICE

The following is a summary of UST bills requiring Board approval for payment:

1. Aon Risk Services \$97,838.00
 Consulting Services November 2015 -- \$58,838.00
 Claims Processing Services November 2015 -- \$39,000.00

2. Aon Risk Services \$97,838.00
 Consulting Services December 2015 -- \$58,838.00
 Claims Processing Services December 2015 -- \$39,000.00

3. Iowa Attorney General's Office \$6,485.98
 Services provided for Underground Storage Tank Program
 September 2015 Billing

Iowa Comprehensive Petroleum

Invoice No. 9500000122731

Iowa Comprehensive Petroleum
Underground Storage Tank Fund
2700 Westown Pkwy, #320
West Des Moines IA 50266 USA

Aon Risk Services Central, Inc
Aon Risk Insurance Services Central, Inc
West Des Moines IA Office
CA License # 0D04043
2700 Westown Parkway, Suite 320
West Des Moines IA 50266
(515) 267-9101 FAX (515) 267-9045



Client Account No.	Invoice Date	Currency	Account Executive
10756349	Sep-15-2015	US DOLLAR	James Gastineau

Named Insured	Service Term	Trans. Eff. Date	Description	Amount
Iowa Comprehensive Petroleum	Jan-01-2015 - Jan-01-2016	Nov-01-2015	Renewal - Service Fee	
Comments			Service Fee	58,838.00
Installation 11 of 12 Monthly Fee			Consulting Expense	39,000.00
Payment due 21 days after Transaction Effective Date.				
Thank you for your business!				
			TOTAL INVOICE AMOUNT DUE	97,838.00

**TO AVOID POTENTIAL DISRUPTION IN YOUR COVERAGE, PAYMENT IS DUE UPON RECEIPT.
Please Make Payable to Aon Risk Services**

FATCA Notice: Please go to Aon.com/FATCA to obtain the appropriate W-9.

Please see reverse side for statement regarding Aon compensation.

Page 1 of 2

Please detach here. Top portion is for your records, bottom portion to be returned with your payment.

Client Account No.	Invoice No.	Invoice Date	Currency	Amount Due
10756349	9500000122731	Sep-15-2015	US DOLLAR	97,838.00

Iowa Comprehensive Petroleum
Underground Storage Tank Fund
2700 Westown Pkwy, #320
West Des Moines IA 50266 USA

Remit to:

Aon Risk Services Central, Inc.
Aon Risk Services Companies, Inc.
75 Remittance Drive - Suite 1943
Chicago IL 60675-1943

Iowa Comprehensive Petroleum

Invoice No. 9500000123259

Iowa Comprehensive Petroleum
Underground Storage Tank Fund
2700 Westown Pkwy, #320
West Des Moines IA 50266 USA

Aon Risk Services Central, Inc.
Aon Risk Insurance Services Central, Inc
West Des Moines IA Office
CA License # 0D04043
2700 Westown Parkway, Suite 320
West Des Moines IA 50266
(515) 267-9101 FAX (515) 267-9045

Client Account No.	Invoice Date	Currency	Account Executive
10756349	Oct-15-2015	US DOLLAR	James Gastineau

Named Insured	Service Term	Trans. Eff. Date	Description	Amount
Iowa Comprehensive Petroleum	Jan-01-2015 - Jan-01-2016	Dec-01-2015	Renewal - Service Fee	
Comments			Service Fee	58,838.00
Installment 12 of 12 Monthly Fee			Consulting Expense	39,000.00
Payment due 21 days after Transaction Effective Date.				
Thank you for your business!				
			TOTAL INVOICE AMOUNT DUE	97,838.00

TO AVOID POTENTIAL DISRUPTION IN YOUR COVERAGE, PAYMENT IS DUE UPON RECEIPT.
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Please see reverse side for statement regarding Aon compensation.

Page 1 of 2

Please detach here. Top portion is for your records, bottom portion to be returned with your payment.

Client Account No.	Invoice No.	Invoice Date	Currency	Amount Due
10756349	9500000123259	Oct-15-2015	US DOLLAR	97,838.00

Iowa Comprehensive Petroleum
Underground Storage Tank Fund
2700 Westown Pkwy, #320
West Des Moines IA 50266 USA

Remit to:

Aon Risk Services Central, Inc.
Aon Risk Services Companies, Inc.
75 Remittance Drive - Suite 1943
Chicago IL 60675-1943

IOWA ATTORNEY GENERAL'S OFFICE
Hoover State Office Bldg - 2nd Floor
Des Moines, Iowa 50319-0141



Invoice Date: 10/08/15

Buyer: Aon Risk Services
2700 Westown Pkwy, Ste 320
West Des Moines, IA 50266
Attn: Dale Cira

Seller: Iowa Attorney General's Office
Hoover State Office Bldg - 2nd Floor
Des Moines, IA 50319-0141

Services For: Assistant Attorneys General
Period of Service: September FY16

Please use the following accounting information for (IET) transfer/payment:

Document Number	Account Coding					Description	Amount
	Fund	Agency	Org	Sub Org	Rev Source		
112AG100815042	0001	112	2301		0302		\$ 6,485.98

Please direct billing questions to Vicki Bahe at 515-281-0853

**Iowa Attorney General's Office
Invoiced Services**

Billing Period:	SEPT 2015
Billing Total:	\$6,485.98
DSS @ 22%	\$1,434.59
RCH @10%	\$364.25
CLJ @12%	\$435.84
Pay period ending: 8/27/15	\$2,234.68
DSS @ 22%	\$1,161.97
RCH @10%	\$285.82
CLJ @12%	\$315.30
Pay period ending: 9/10/2015	\$1,763.09
DSS @ 22%	\$1,434.59
RCH @10%	\$364.25
CLJ @12%	\$435.84
Pay period ending: 9/24/2015	\$2,234.68
Worker's Comp Annual Billing (FY 2016)	\$253.53
DSS (September 2013)	
	\$6,485.98

DSS = David Steward **22%**

Dave is our Asst Attorney General who provides the Board with legal counsel, drafts agreements and settlements with other State agencies and claimants.

RCH = Richard Heathcote **10%**

Rich is a PhD hydrogeologist who consults for the Board by reviewing claim files and DNR records to assist in the determination of technologies used at sites. Rich reviews site files for the usage of RBCA Tier 3 reports; he also reviews proposals for CRP's or special projects.

CLJ = Cindy Jacobs **12%**

Cindy is a legal secretary for the Environmental/UST Division of the Attorney General's Office located in the Lucas Building. Cindy completes status reports and maintains appeal files for UST claimants with regard to their UST Fund benefits' eligibility.

Monthly Activity Report and Financials Reviewed

A. September 2015 Activities Report

Sep-15

	Open Claims		Open Claims		Open & Closed	
Claims	Aug 2015 Ending	Monthly Net Changes	Aug 2015 Ending	Totals since Inception		
RETROACTIVE						
number	26	0	26	447		
reserve	\$1,389,259.88	(\$32,611.34)	\$1,356,648.54	\$1,356,648.54		
paid	\$6,083,601.78	\$32,611.34	\$6,116,213.12	\$17,973,776.53		
total	\$7,472,861.66	\$0.00	\$7,472,861.66	\$19,330,425.07		
REMEDIAL						
number	353	(7)	346	4,457		
reserve	\$19,251,447.30	(\$97,677.64)	\$19,153,769.66	\$19,153,769.66		
paid	\$71,081,126.13	(\$559,822.36)	\$70,521,303.77	\$214,657,002.55		
total	\$90,332,573.43	(\$657,500.00)	\$89,675,073.43	\$233,810,772.21		
INNOCENT LANDOWNER						
number	115	(2)	113	1,132		
reserve	\$5,874,933.27	(\$63,215.86)	\$5,811,717.41	\$5,811,717.41		
paid	\$10,654,817.73	(\$25,784.14)	\$10,629,033.59	\$31,531,755.66		
total	\$16,529,751.00	(\$89,000.00)	\$16,440,751.00	\$37,343,473.07		
GLOBAL OPT-IN						
number	75	(2)	73	1,303		
reserve	\$375,770.60	(\$15,197.12)	\$360,573.48	\$360,573.48		
paid	\$645,542.85	(\$12,802.88)	\$632,739.97	\$9,777,787.90		
total	\$1,021,313.45	(\$28,000.00)	\$993,313.45	\$10,138,361.38		
UNASSIGNED REVENUE FUND PROJECTS						
number	67	6	73	292		
reserve	\$1,865,135.71	(\$34,389.00)	\$1,830,746.71	\$1,830,746.71		
paid	\$610,864.29	\$43,389.00	\$654,253.29	\$3,135,322.43		
total	\$2,476,000.00	\$9,000.00	\$2,485,000.00	\$4,966,069.14		
NFA RE-EVALUATIONS						
number	13	0	13	58		
reserve	\$229,127.95	\$11,970.56	\$241,098.51	\$241,098.51		
paid	\$370,872.05	\$8,029.44	\$378,901.49	\$1,169,899.93		
total	\$600,000.00	\$20,000.00	\$620,000.00	\$1,410,998.44		
TANK PULLS						
number	29	2	31	409		
reserve	\$288,342.00	\$13,615.00	\$301,957.00	\$301,957.00		
paid	\$0.00	\$9,385.00	\$9,385.00	\$4,534,213.34		
total	\$288,342.00	\$23,000.00	\$311,342.00	\$4,836,170.34		

Corrective Action Meetings (9/15)	
Scheduled:	6
Completed:	1,271
MOA's	488

UST Operator Training	
UST Operators (A / B)	3,070
A/B (FY2011-16)	\$296,220.00

2015 Discretionary Incentive Goal	115	Net Closed (thru 9/30)	70
Claims closed: AUG (RT, RM, ILO, NFA)	10	Re-Open <30 days	1
Claims closed YTD	83	Re-Open YTD <30 d	13

RT Claims	#
New	0
Reopened	0
Closed	0

RM Claims	#
New	0
Reopened	0
Closed	7

ILO Claims	#
New	1
Reopened	0
Closed	3

GS Claims	#
New	0
Reopened	0
Closed	2

USTCA	#
New	7
Reopened	1
Closed	2

NFA Re-Eval	#
New	0
Reopened	0
Closed	0

Tank Pull	#
New	7
Reopened	1
Closed	4

DNR @ 9-30-15	
Total LUST	6615
OPEN LUST	766
High Risk	431
Low Risk	167
NAR-FP	67
Not Class.	101

Invoice Type Totals	AUG	FYTD	Program to Date
Aon - Admin	\$ 59,881.12	\$ 58,838.00	
Aon - Claims	\$ 39,000.00	\$ 78,000.00	
Government	\$ 18,170.90	\$ 135,859.50	
2004 Tank Pull	\$ -	\$ -	\$ 1,761,823.44
2010 Tank Pull	\$ 41,068.88	\$ 238,850.11	\$ 4,620,831.85
American Soils	\$ -	\$ -	\$ 5,678,422.58
AST Removal	\$ -	\$ -	\$ 3,306,435.24
AST Upgrade	\$ -	\$ -	\$ 7,911,496.87
CADR Charges	\$ 21,811.76	\$ 28,277.75	\$ 4,621,939.53
Corrective Action			\$ 52,423,154.11
Expenses / OT	\$ 500.00	\$ 3,400.00	\$ 296,420.00
Free Prod Recover	\$ 106,232.71	\$ 205,691.33	\$ 11,435,206.40
Monitoring	\$ 124,501.57	\$ 396,635.39	\$ 31,269,714.75
Operations/Maint	\$ 23,340.49	\$ 74,972.63	\$ 10,266,717.34
Over-excavation	\$ 147,070.10	\$ 300,562.94	\$ 32,599,718.48
Water Lines	\$ 1,011.65	\$ 112,253.77	\$ 2,662,206.98
Post RBCA Evals	\$ 1,592.92	\$ 6,362.92	\$ 236,975.91
RBCA	\$ 23,756.50	\$ 136,052.38	\$ 26,631,584.19
Remed Imp/Const.	\$ 6,684.68	\$ 132,479.74	\$ 29,215,650.28
SCR Charges	\$ -	\$ -	\$ 54,217,410.26
Site Check	\$ -	\$ -	\$ 142,486.32
Soil Disposal	\$ -	\$ -	\$ 738,386.66
Tank (UST) Pull			\$ 3,979,734.25
Tank (UST) Upgrade	\$ -	\$ -	\$ 3,440,849.83
Tier III	\$ 500.00	\$ 2,605.00	\$ 1,368,371.40
Utilities	\$ 6,504.88	\$ 22,771.94	\$ 2,117,994.52
Well Closure	\$ 18,274.73	\$ 44,794.71	\$ 3,912,808.54
Total Invoice Types	\$ 522,850.87	\$ 1,705,710.61	\$ 293,906,044

Remediation Budgets Approved to Date		
last month (Sep '15)	4	\$418,701
Trailing 12 mos	44	\$3,066,647
Prev Trail 12 mos	47	\$3,271,616
Total Since Jan 2003	1,190	\$50,551,836

Project Contracts	Open	Closed	Pending
CRP's	5	40	0
NFA Re-Opener	2	0	2
Tank Closure	2	5	0
Plastic Water Line	0	2	0

B. September 2015 Financial Report

**IOWA COMPREHENSIVE PETROLEUM UNDERGROUND STORAGE TANK FUND
STATEMENT OF FUND BALANCES
FOR THE MONTH ENDING SEPTEMBER 30, 2015**

0471 - UST REVENUE FUND (Bonding)

<hr/>		
Balance of Fund, September 1, 2015		\$541,405.50
 Receipts:		
Motor Vehicle Use Tax (IDOT - vehicle registration)	\$3,500,000.00	
Intra State Fund Transfers Received	\$0.00	
Interest Income	\$1,253.41	
	<hr/>	\$3,501,253.41
 Disbursements:		
Bond Interest Payment	\$0.00	
Bond Principal Payment	\$0.00	
EPC Charges	\$0.00	
Adjustments	\$0.00	
Transfer to General Fund	\$0.00	
Transfer to Unassigned Revenue Fund (0450)	\$0.00	
Transfer to Innocent Landowner Fund (0485)	\$0.00	
Transfer to Remedial Non-Bonding Fund (0208)	\$0.00	
	<hr/>	\$0.00
Balance of Fund, September 30, 2015		<hr/> \$4,042,658.91 <hr/>

0450 - UST UNASSIGNED REVENUE FUND (Non-Bonding)

<hr/>		
Balance of Fund, September 1, 2015		\$9,084,404.57
 Receipts:		
Copying/Filing Fees	\$0.00	
Fines & Penalties	\$0.00	
Refund/Overpayment	\$0.00	
Transfer From UST Revenue Fund (0471)	\$0.00	
Interest Income	\$7,470.81	
	<hr/>	\$7,470.81
 Disbursements:		
UST Administrator's Fees	\$98,991.12	
Adjustment	\$0.00	
Attorney General's Fees	\$0.00	
Attorney's Fees: Cost-Recovery Administration	\$0.00	
Cost Recovery Expense (i.e. Lien Filing, Overpayment Refund)	\$0.00	
Actuarial Fees	\$0.00	
Auditor of the State Fees	\$0.00	
Claim Settlement	\$0.00	
Department of Revenue EPC Collection Fees	\$0.00	
Department of Inspection & Appeals Service Fees	\$0.00	
Environmental Protection Charge Refunds	\$0.00	
Iowa Finance Authority Expenses	\$0.00	
Legal and Professional Fees	\$0.00	
Postage / Printing / Miscellaneous	\$0.00	
Professional Services - Owner/Operator Training	\$500.00	
Rebate	\$0.00	
Special Project Claims - Closure Contract Project	\$45,054.00	
Travel Expenses-UST Board Members	\$0.00	

**IOWA COMPREHENSIVE PETROLEUM UNDERGROUND STORAGE TANK FUND
STATEMENT OF FUND BALANCES
FOR THE MONTH ENDING SEPTEMBER 30, 2015**

Warrant Float Expense	\$0.00	
28E Agreement - DNR RBCA Model Revision	\$0.00	
Statutory Transfer to DNR (Admin match)	\$0.00	
Statutory Transfer to DNR (tech review - recurring & carry over)	\$0.00	
Statutory Transfer to IDAL (fuel inspections - recurring & carry over)	\$0.00	
Appropriation 2015	\$0.00	
Appropriation 2016	\$18,170.90	
Offset of Funds to/from Innocent Land Owners (0485)	\$0.00	
Offset of Funds to/from Remedial Fund (0208)	(\$1,415.00)	
		\$161,301.02
Balance of Fund, September 30, 2015		\$8,930,574.36
 0208 - UST REMEDIAL NON-BONDING FUND		
Balance of Fund, September 1, 2015		\$16,027,317.02
Receipts:		
Remedial Refunds	\$0.00	
Misc. Income (i.e. eligibility settlements)	\$0.00	
Interest Income	\$0.00	
Transfer From UST Revenue Fund (0471)	\$0.00	
		\$0.00
Disbursements:		
Retroactive Claims	\$32,611.34	
Remedial Claims	\$311,161.48	
28E Agreement - NFA Claims	\$8,029.44	
Adjustment	\$0.00	
Offset of Funds to/from ILO/GS Fund	\$0.00	
Offset of Funds to/from Unassigned Revenue Fund (0471)	\$0.00	
Balance of Outdated Warrants & Cancelled Warrants	\$0.00	
		\$351,802.26
Balance of Fund, September 30, 2015		\$15,675,514.76
 0478 - UST MARKETABILITY FUND		
Balance of Fund, September 1, 2015		\$795,068.34
Receipts:		
Interest	\$2,795.22	
Use Tax	\$0.00	
		\$2,795.22
Disbursements:		
Intra State Fund Transfer	\$0.00	
Transfer to Innocent Landowners Fund	\$0.00	
		\$0.00
Balance of Fund, September 30, 2015		\$797,863.56
 0485 - UST INNOCENT LANDOWNERS FUND		
Balance of Fund, September 1, 2015		\$6,874,714.67
Receipts:		
Cost Recovery (i.e. lien settlements)	\$1,105.00	
ILO Refunds	\$0.00	
Transfer From UST Revenue Fund (0471)	\$0.00	
Transfer From Loan Gaurantee Fund (0238)	\$0.00	

**IOWA COMPREHENSIVE PETROLEUM UNDERGROUND STORAGE TANK FUND
STATEMENT OF FUND BALANCES
FOR THE MONTH ENDING SEPTEMBER 30, 2015**

Outdated Warrants	\$0.00	
Miscellaneous Income	\$0.00	
		\$1,105.00
Disbursements:		
Cost Recovery Reimbursement	\$0.00	
Cost Recovery Global Settlement	\$0.00	
Adjustment	\$0.00	
Intra State Fund Transfers Paid (to Unassigned Revenue)	\$0.00	
Other Contractual Services	\$1,015.00	
Global Settlement Claims	\$7,576.70	
Innocent Landowner Claims	\$119,332.91	
Transfer to Remedial Fund (0208)	\$0.00	
Transfer to/from Unassigned Revenue Fund (0471)	\$0.00	
Balance of Outdated Warrants	\$6,217.20	
		\$134,141.81
Balance of Fund, September 30, 2015		\$6,741,677.86
 0238 - UST LOAN GUARANTEE FUND (Non-Bonding)		
		\$0.00
Balance of Fund, September 30, 2015		\$0.00
 0614 - UST CAPITAL RESERVE FUNDS (Bonding)		
		\$0.00
Balance of Fund, September 30, 2015		\$0.00
 Combined UST Capital Reserve Fund Balances, September 30, 2015		 \$0.00
TOTAL FUND BALANCES, September 30, 2015		\$36,188,289.45

FOOTNOTES:

Note 1: Funds labeled "Bonding" were created as a result of the issuance of UST Revenue Bonds. Disbursements from these funds are restricted by the Revenue Bond indenture.

Funds labeled "Non-Bonding" are funds not restricted as to use by the Revenue Bond indenture.

C. Year-to-Date Financials as of September 30, 2015

**IOWA COMPREHENSIVE PETROLEUM UNDERGROUND STORAGE TANK FUND
STATEMENT OF FUND BALANCES
FISCAL YEAR TO DATE ENDING SEPTEMBER 30, 2015**

		FISCAL 2016 BUDGET
0471 - UST REVENUE FUND (Bonding)		
Balance of Fund, July 1, 2015	\$538,281.87	\$538,281.87
Receipts:		
Motor Vehicle Use Tax (IDOT - vehicle registration)	\$3,500,000.00	\$14,000,000.00
Intra State Fund Transfers Received	\$0.00	
Interest Income	\$4,377.04	\$50,000.00
	\$3,504,377.04	\$14,050,000.00
Disbursements:		
Bond Interest Payment	\$0.00	\$0.00
Bond Principal Payment	\$0.00	\$0.00
EPC Charges	\$0.00	\$0.00
Adjustments	\$0.00	\$0.00
Transfer to General Fund	\$0.00	\$0.00
Transfer to Unassigned Revenue Fund (0450)	\$0.00	\$0.00
Transfer to Innocent Landowner Fund (0485)	\$0.00	\$0.00
Transfer to Remedial Non-Bonding Fund (0208)	\$0.00	\$9,000,000.00
	\$0.00	\$9,000,000.00
Balance of Fund, September 30, 2015	\$4,042,658.91	\$5,588,281.87
0450 - UST UNASSIGNED REVENUE FUND (Non-Bonding)		
Balance of Fund, July 1, 2015	\$9,417,609.04	\$9,417,609.04
Receipts:		
Copying/Filing Fees	\$0.00	\$0.00
Fines & Penalties	\$0.00	\$0.00
Refund/Overpayment	\$0.00	\$0.00
Transfer From UST Revenue Fund (0471)	\$0.00	\$0.00
Interest Income	\$26,800.80	\$50,000.00
	\$26,800.80	\$50,000.00
Disbursements:		
UST Administrator's Fees	\$196,829.12	\$1,100,000.00
Adjustment	\$0.00	\$0.00
Attorney General's Fees	\$5,775.24	\$50,000.00
Attorney's Fees: Cost-Recovery Administration	\$0.00	\$0.00
Cost Recovery Expense (i.e. Lien Filing, Overpayment Refund)	\$12.00	\$150.00
Actuarial Fees	\$0.00	\$0.00
Auditor of the State Fees	\$5,715.38	\$5,100.00
Claim Settlement	\$0.00	\$0.00
Department of Revenue EPC Collection Fees	\$1,027.43	\$25,000.00
Department of Inspection & Appeals Service Fees	\$0.00	\$500.00
Environmental Protection Charge Refunds	\$0.00	\$0.00
Iowa Finance Authority Expenses	\$0.00	\$0.00
Legal and Professional Fees	\$0.00	\$0.00
Postage / Printing / Miscellaneous	\$0.00	\$500.00
Professional Services - Owner/Operator Training	\$3,400.00	\$50,000.00
Rebate	\$0.00	\$0.00
Special Project Claims - Closure Contract Project	\$183,255.21	\$800,000.00
Travel Expenses-UST Board Members	\$0.00	\$700.00

**IOWA COMPREHENSIVE PETROLEUM UNDERGROUND STORAGE TANK FUND
STATEMENT OF FUND BALANCES
FISCAL YEAR TO DATE ENDING SEPTEMBER 30, 2015**

		FISCAL 2016 BUDGET
Warrant Float Expense	\$0.00	\$0.00
28E Agreement - DNR RBCA Model Revision	\$3,633.75	\$92,000.00
Statutory Transfer to DNR (Admin match)	\$0.00	\$200,000.00
Statutory Transfer to DNR (technical review - recurring & carry over)	\$0.00	\$361,110.00
Statutory Transfer to IDAL (fuel inspections - recurring & carry over)	\$0.00	\$440,382.07
Appropriations Prior Fiscal Year	\$50,684.73	\$30,000.00
Appropriations Current Fiscal Year	\$72,657.62	\$0.00
Offset of Funds to/from Innocent Land Owners (0485)	(\$7,740.00)	(\$150,000.00)
Offset of Funds to/from Remedial Fund (0208)	(\$1,415.00)	(\$150,000.00)
	<u>\$513,835.48</u>	<u>\$2,855,442.07</u>
Balance of Fund, September 30, 2015	\$8,930,574.36	\$6,612,166.97
0208 - UST REMEDIAL NON-BONDING FUND		
Balance of Fund, July 1, 2015	\$16,834,687.68	\$16,834,687.68
Receipts:		
Remedial Refunds	\$0.00	\$0.00
Misc. Income (i.e. eligibility settlements)	\$0.00	\$0.00
Interest Income	\$0.00	\$0.00
Transfer From UST Revenue Fund (0471)	\$0.00	\$9,000,000.00
	<u>\$0.00</u>	<u>\$9,000,000.00</u>
Disbursements:		
Retroactive Claims	\$167,446.35	\$700,000.00
Remedial Claims	\$972,860.63	\$5,750,000.00
28E Agreement - NFA Claims	\$18,865.94	\$500,000.00
Adjustment	\$0.00	\$0.00
Offset of Funds to/from ILO/GS Fund	\$0.00	\$150,000.00
Offset of Funds to/from Unassigned Revenue Fund (0471)	\$0.00	(\$80,000.00)
Balance of Outdated Warrants	\$0.00	
	<u>\$1,159,172.92</u>	<u>\$7,020,000.00</u>
Balance of Fund, September 30, 2015	\$15,675,514.76	\$18,814,687.68
0478 - UST MARKETABILITY FUND		
Balance of Fund, July 1, 2015	\$787,669.61	\$787,669.61
Receipts:		
Interest	\$10,193.95	\$35,000.00
Use Tax	\$0.00	
	<u>\$10,193.95</u>	<u>\$35,000.00</u>
Disbursements:		
Intra State Fund Transfer	\$0.00	\$0.00
Transfer to Innocent Landowners Fund	\$0.00	\$0.00
	<u>\$0.00</u>	<u>\$0.00</u>
Balance of Fund, September 30, 2015	\$797,863.56	\$822,669.61
0485 - UST INNOCENT LANDOWNERS FUND		
Balance of Fund, July 1, 2015	\$7,110,415.34	\$7,110,415.34
Receipts:		
Cost Recovery (i.e. lien settlements)	\$1,315.00	\$25,000.00
ILO Refunds	\$0.00	\$0.00
Transfer From UST Revenue Fund (0471)	\$0.00	\$0.00
Transfer From Loan Gaurantee Fund (0238)	\$0.00	\$0.00

**IOWA COMPREHENSIVE PETROLEUM UNDERGROUND STORAGE TANK FUND
STATEMENT OF FUND BALANCES
FISCAL YEAR TO DATE ENDING SEPTEMBER 30, 2015**

		FISCAL 2016 BUDGET
Outdated Warrants	\$0.00	\$0.00
Miscellaneous Income	\$0.00	\$0.00
	\$1,315.00	\$25,000.00
Disbursements:		
Cost Recovery Reimbursement	\$0.00	\$0.00
Cost Recovery Global Settlement	\$0.00	\$0.00
Adjustment	\$0.00	\$0.00
Intra State Fund Transfers Paid (to Unassigned Revenue)	\$0.00	\$0.00
Other Contractual Services	\$1,015.00	\$0.00
Global Settlement Claims	\$10,642.07	\$80,000.00
Innocent Landowner Claims	\$350,655.41	\$2,000,000.00
Transfer to/from Remedial Fund (0208)	\$0.00	\$0.00
Transfer to/from Unassigned Revenue Fund (0471)	\$7,740.00	\$150,000.00
Balance of Outdated Warrants	\$0.00	\$0.00
	\$370,052.48	\$2,230,000.00
Balance of Fund, September 30, 2015	\$6,741,677.86	\$4,905,415.34
0238 - UST LOAN GUARANTEE FUND (Non-Bonding)		
Balance of Fund, September 30, 2015	\$0.00	\$0.00
0614 - UST CAPITAL RESERVE FUNDS (Bonding)		
Combined UST Capital Reserve Fund Balances, September 30, 2015	\$0.00	\$0.00
TOTAL FUND BALANCES, September 30, 2015	\$36,188,289.45	\$36,743,221.47

FOOTNOTES:

Note 1: Funds labeled "Bonding" were created as a result of the issuance of UST Revenue Bonds. Disbursements from these funds are restricted by the Revenue Bond indenture. Funds labeled "Non-Bonding" are funds not restricted as to use by the Revenue Bond indenture. **All bond funds are \$0.00 8/31/08**

D. Liens Filed

Iowa Underground Storage Tank Fund Liens Filed

(Updated 10-21-2015)

Lien #	County	Site #	Claim #	Site Address	Property Owner	Owner Address	Cost Recovery Letter	Cost Rec. Ltr - ticker date	Lien Fee Requested	Mld Notice & Fee	Lien Amount	Lien Filed Date	Book & Page	Request Release Fee	Lien Settlement
0310004	Palo Alto	8916647	13007	510 Inman Ave, Mallard	Theodore J and Norma J Larson	510 Inman Ave, Mallard 50562	10/1/2003		10/2/2003	10/24/2003	\$59,055.50	10/30/2003 ; renewed 10/30/2013			
0404009	Butler	8608131	12039	12682 Highway 3, Dumont	Dave Dohlman	11794 195th St, Dumont 50625-7504	1/20/2004		3/24/2004	4/12/2004	\$13,650.00	4/14/2004; renewed 3/17/2014	2004-1676, 2014-		
0404010	Ida	8710293	73001 & 73013	Hwy 59 & 175, Ida Grove	Robin Hill Trust, %Vernus Wunschel	Box 113, Ida Grove 51445			4/19/2004	4/29/2004	\$330,131.40	4/30/2004; renewed 6/24/14	6-349		
0605012	Keokuk	8609694	73040 / 11003	407 South Barnes St, What Cheer	Melvin & Karen Foubert	601 N. Barnes St, What Cheer 50268	2/2/2006	3/31/2006	4/24/2006	5/15/2006	\$82,373.75	5/16/2006	2006-0962		
0610017	Jefferson	8601629	11023 / 14009	206 West Main St, Lockridge	Richard & Connie Richardson	206 West Main St, Lockridge 52635-9705	7/13/2006	8/30/2006	10/13/2006	10/24/2006	\$35,202.00	10/25/2006	2006-2472		
0611018	Taylor	300033	13053 /15001	NE Corner Adams & 3rd St, Gravity	Terry J Smith	PO Box 133, Gravity IA 50848	7/6/2006	8/15/2006	10/18/2006	11/7/2006	\$52,090.00	11/9/2006	6-265,266		
0611019	Clay	8915566	15012	502 North Main St, Everly	Roger Ginger	Box 347, Everly, IA 51338	5/26/2006		10/18/2006	11/7/2006	\$14,932.00	11/13/2006	2006-3529		
0701022	Van Buren	8600890	11032 / 14002	SW Corner Hwy. 1 & 180th St., Keosauqua	Henry Robbins	102 Greenvale Drive, Mansfield, TX 76063-5556	10/20/2006	11/30/2006	12/22/2006	1/16/2007	\$32,980.90	1/19/2007	136-856		
0702023	Montgomery	8607574	15013	Tenville IA	Marvin G. Shipley	2048 Tenville Avenue, Villisca	10/30/2006	11/30/2006	1/23/2007	2/13/2007	\$2,795.00	2/16/2007	302-663,664		
0704025	Tama	9017159	14005	IJ's Gas & Bait, 100 Jacobs St., Chelsea	Tony J. & Christie Jacobi	2772 370th Street, Chelsea, IA 52215	12/7/2006	1/30/2007	4/25/2007	5/15/2007	\$17,839.00	5/17/2007	43-474		
0706029	Woodbury	9217516	73002	29 Deer Run Trail, Climbing Hill	Pat Benjamin	7 Merville Blacktop, PO Box 25, Climbing Hill 51501	3/27/2007	4/30/2007	6/1/2007	8/1/2007	\$14,400.00	8/7/2007	692 - 10744, 10745		
0801030	Cass	8608073	82102	802 Main St., Griswold, IA	Griswold Custom Classics LC	Clifford Speck, 802 Main St., Griswold, IA 51535	10/12/2007	11/30/2007	1/11/2008	1/31/2008	\$5,945.00	2/1/2008	2008 - 223		Payment plan started 9/2013
1506031	Monroe	8607257	17022	300 Highway 34 West, Albia	Stop&Shop/Eddyville Oil Co.	210 15th Ave W., Albia, IA	3/5/2015	4/20/2015	6/17/2015	7/16/2015	\$16,397.00	7/20/2015	2015 - 1053		
150732	Webster	8605779	16041	1406 A St. Ft Dodge, IA	David & Elaine Killian	1005 River Forest Ct., Ft. Dodge, IA	7/27/2015	9/20/2015			\$5,893.50				Payment plan started 8/2015

Attorney General's Report

Claim Payment Approval

**IOWA UNDERGROUND STORAGE TANK PROGRAM
THIRD BOARD REPORT
OCTOBER 19, 2015
GILLOTTI CONSTRUCTION
1405 SE 1ST STREET
DES MOINES
SITE REGISTRATION NUMBER: 8601716
LUST NUMBER: 8LTK56**

RISK CLASSIFICATION:

HIGH LOW NAR-FP

PRESENT CLAIM RESERVE: \$ 325,000.00

PREVIOUS BOARD APPROVAL: \$ 300,000.00
Number and Date of each previous Board Report: 1st: March 9, 2010, 2nd: August 27, 2015

PREVIOUS COSTS INCURRED: \$ 90,468.03

COSTS INCURRED SINCE LAST BOARD APPROVAL:

1. Excavation in progress

TOTAL COSTS INCURRED TO DATE: \$ 90,468.03

PROJECTED COSTS:

❖ Free Product Recovery ❖ Completion of an over-excavation

TOTAL PROJECTED COSTS: \$ 235,000.00 to 285,000.00+

ADDITIONAL AUTHORITY RECOMMENDED:

TOTAL AUTHORITY:* \$ 350,000.00

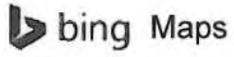
COMMENTS:

The site is classified as no action required with free product. The USTs were removed in 1991. The site consists of a shop building and a large parking lot. Free product by hand bailing has been ongoing for many years. The consultant recommended an excavation in an attempt to remove the free product and end recovery. The excavation began on October 11th and became larger than an anticipated due to a larger volume of contamination. Additional authority is being sought to cover costs that have already been incurred. The excavation should allow for the closure of this claim following post-excavation monitoring for free product.

*Previous approval + additional recommended

Site Timeline

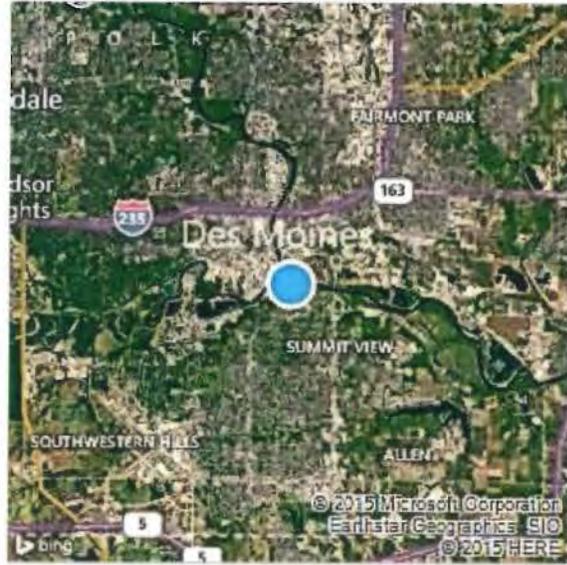
- 1991 - Contamination was discovered during a tank removal in January of 1991.
- 1994 – Free product is discovered and hand bailing begins.
- 1995 - SCR completed and accepted as high risk. CADR due in 120 days.
- 1996 – The DNR accepts a recommendation for high risk monitoring in lieu of corrective action.
- 2000 - Tier 2 submitted. DNR issues 'not accepted' letter on November 3, 2000.
- 2001 - Revised Tier 2 submitted and accepted as low risk.
- 2008 – Site is reclassified to 'no action required' with free product.
- 2009 to present – Monthly hand bailing of free product has occurred.
- 2015 – Overexcavation of the free product area began on Monday, October 11th.



1. SE 1st St, Des Moines, IA 50309

My Notes

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 Bird's eye view maps can't be printed, so another map view has been substituted.

- 1990 - Claim filed by Frohein Stores, Inc. on February 21, 1990. Contamination exceeding the target levels was not documented, and the DNR did not open a LUST number. Claim closed.
- 1990 - Casey's removed the remaining USTs on October 10, 1990. DNR issues a LUST number for the documented release. A claim was not filed.
- 1994 - The SCR is submitted and accepted as high risk by the IDNR in a letter dated January 13, 1995, with a CADR due in 120 days.
- 1994-1999 – Annual monitoring completed. CADR submitted recommending high risk monitoring only.
- 2000 - Tier 2 submitted and accepted as high risk by the IDNR in a letter dated May 26, 2000.
- 2003 – An SMR recommending site reclassification to low risk is not accepted
- 2003 – 2008 – Annual high risk monitoring completed.
- 2008 – present – Site classified as low risk in SMRs, not reviewed by the IDNR.
- 2013 – Free product discovered and free product recovery by hand-bailing begins.
- 2013 – Casey's submits an eligible ILO (late filed remedial) claim on October 17, 2013. Past costs, subject to copay requirement, are reimbursed.
- 2015 – Consultant completes a large excavation to potentially close the claim.

Google Maps 13210 US-65



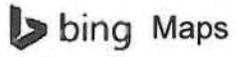
Imagery ©2015 DigitalGlobe, Kucera Intl./Story County, USDA Farm Service Agency, Map data ©2015 Google 200 ft



13210 US-65
Zearing, IA 50278

Site Timeline

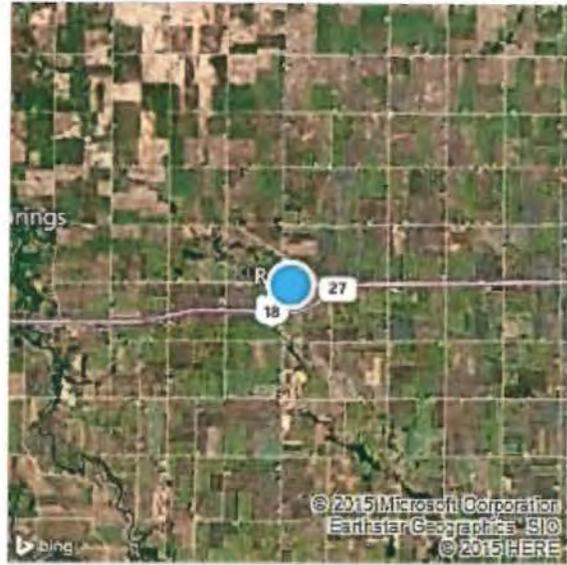
- 1989 - Contamination is discovered in a sniffer well in the tank pit for a 500 gallon diesel UST used to fuel the school buses.
- 1990 - The 500 gallon UST is removed from the site on 10/01/90. All fuel dispensing activities end.
- 1990 - A retro claim is submitted on 10/30/90. The claim is denied as the filing deadline was missed.
- 1995 - SCR (non-funded) is accepted as high risk. DNR accepts a monitoring approach.
- 1996 - GAB Robins notifies the school that they may be eligible for the late-filed retro claim thru the newly passed ILO program.
- 1999 - An ILO claim is filed and is determined to be eligible.
- 2000 - RBCA Tier 2 is submitted and accepted as high risk. CADR due in 120 days.
- 2005 - First corrective action teleconference held on 12/20/05 to discuss this site and an adjacent site owned by Floyd County (7LTI75). Agreed on additional investigation of the receptors for both sites before determining if corrective action was necessary.
- 2005 – 2015 – Overall declining concentrations and long periods without measurable free product have delayed corrective action activities.
- 2015 - Tier 3 recommending reclassification to NAR (with free product) is accepted pending addressing risk to water line.



4. Floyd St, Rudd, IA 50471

My Notes

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 Bird's eye view maps can't be printed, so another map view has been substituted.

Google Maps 172 Railroad St



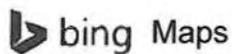
Imagery ©2015 DigitalGlobe, USDA Farm Service Agency, Map data ©2015 Google 200 ft



172 Railroad St
New Albin, IA 52160

Site Timeline

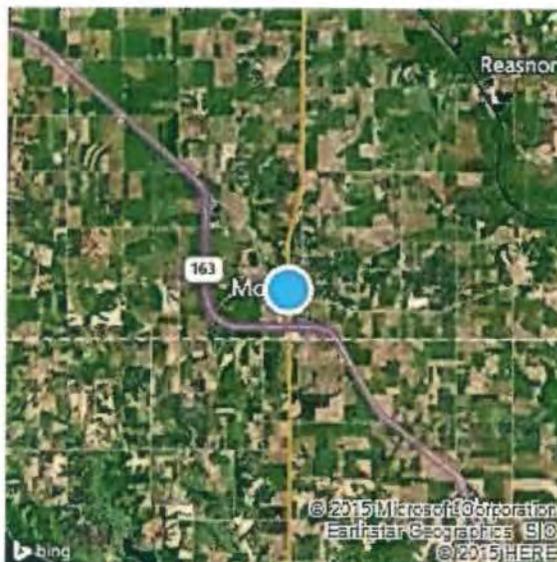
- 1990 - Contamination discovered during a site check in September of 1990. A remedial claim is filed by Brodersen Oil Co.
- 1993 - SCR submitted and accepted as low risk. Annual monitoring is required.
- 2000 - RBCA Tier 2 accepted as high risk on January 10, 2000. CADR due in 120 days.
- 2001 - Free product discovered during monitoring activities. Monthly hand bailing begins.
- 2003 - Casey's Marketing Co. takes over the benefits for this site.
- 2010 - Tanks removed in February. Site ceases to operate as a gas station.
- 2013 - A corrective action teleconference is scheduled, but then cancelled when the consultant informs the DNR that a budget for an expedited excavation will be submitted to Casey's and the fund.
- 2015 - After many delays, an excavation proposal is received by Cunningham Lindsey on 10/15/15.



1 S Monroe St, Monroe, IA 50170

My Notes

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 Bird's eye view maps can't be printed, so another map view has been substituted.

**IOWA UNDERGROUND STORAGE TANK PROGRAM
 THIRD BOARD REPORT
 OCTOBER 21, 2015
 WOODBURY CENTRAL SCHOOLS
 79 DEER RUN TRAIL
 CLIMBING HILL
 SITE REGISTRATION NUMBER: 8811618
 LUST NUMBER: 7LTV89**

RISK CLASSIFICATION:

HIGH

LOW

UNDETERMINED

PRESENT CLAIM RESERVE: \$ 600,000.00

PREVIOUS BOARD APPROVAL: \$ 565,000.00

Number and Date of each previous Board Report: 1st: July 26, 1995, 2nd: December 2, 2009

PREVIOUS COSTS INCURRED: \$ 538,704.20

COSTS INCURRED SINCE LAST BOARD APPROVAL:

1. Site monitoring reports	26,165.51
2. Corrective action teleconference	315.00

TOTAL COSTS INCURRED TO DATE: \$ 565,183.71

PROJECTED COSTS:

- ❖ Site Monitoring Report
- ❖ Water line / Corrective action?

TOTAL PROJECTED COSTS: \$ 35,000.00 to 50,000.00 +

ADDITIONAL AUTHORITY RECOMMENDED:

\$ 50,000.00

TOTAL AUTHORITY:*

\$ 615,000.00

COMMENTS: The site is high risk for the groundwater ingestion pathway. The water table is deep (~30 ft) and contamination appears to have spread over some distance. Corrective action was completed in 1995 (excavation) and in 2003 with the installation of two private association wells to serve multiple affected parties, and one public well for the use of a local restaurant. Due to siting requirements, the public well was placed on private land with a 10-year lease, with an option to renew for an additional 10-yr period. The lease expired in 2013 with no action taken by the lessee. The landowner is now asking the well to be removed and thus the lessee will soon no longer have access to a source of potable water.

Since installation of the well was considered corrective action and as the lessee cannot install a well on his property, a new water source is needed. The best option is to install a new water main to connect to the East Association well, then install a new well next year. Authority is requested to provide for the water line and new well; costs will be shared with the claim for site # 9217516 – Pat Benjamin / Tuff Luk, Inc. Affected population less than 100.

*Previous approval + additional recommended

Site Timeline

1990 – Petroleum contamination identified during removal of one 500 gal gas tank used for school buses.

1992 – Site investigation completed to assess area and investigate source of contamination affecting nearby water wells.

1995: Excavation completed to remove soil contamination in former tank basin.

1996-2003: Monitoring completed as required.

2000: Forced into State Lead project due to commingled contaminant plumes. Multiple discussions held on options to address area contamination; due to lack of a governing body, lack of a public water supply nearby, and lack of options to treat contamination at depth, the decision was made to install two private water supply wells for the property owners in the area and a public water supply well for the local restaurant. Several public meetings in the community were held to discuss the options and present the plan.

2003 - The East and West Association wells and one public drinking water well were installed; the private wells were designed to serve no more than 25 individuals per well. Due to poor water quality, all residents connected to the East Association well were offered and most were provided water softeners and iron removal systems.

2004 - Several of the previously impacted or threatened drinking water wells were plugged; property owners were told all remaining wells could only be used for non-potable water.

2005 – present – Annual monitoring of this site has been completed. The claimant at some point chose to disconnect from the East Association well and reconnect his owned properties to one or more of the pre-existing water wells; one of which is considered to be a high risk receptor.

**IOWA UNDERGROUND STORAGE TANK PROGRAM
 THIRD BOARD REPORT
 OCTOBER 21, 2015
 PAT BENJAMIN / TUFF LUCK, INC
 29 DEER RUN TRAIL
 CLIMBING HILL
 SITE REGISTRATION NUMBER: 9217516
 LUST NUMBER: 8LTU14**

RISK CLASSIFICATION:

HIGH

LOW

UNDETERMINED

PRESENT CLAIM RESERVE: \$ 515,000.00

PREVIOUS BOARD APPROVAL: \$ 500,000.00

Number and Date of each previous Board Report: 1st: December 2, 2009, 2nd: January 14, 2015

PREVIOUS COSTS INCURRED: \$ 464,520.68

COSTS INCURRED SINCE LAST BOARD APPROVAL:

1. Site monitoring reports 1,464.30

TOTAL COSTS INCURRED TO DATE: \$ 465,984.98

PROJECTED COSTS:

- ❖ Site Monitoring Report
- ❖ Water line / Corrective action?

TOTAL PROJECTED COSTS: \$ 35,000.00 to 50,000.00 +

ADDITIONAL AUTHORITY RECOMMENDED:

\$ 50,000.00

TOTAL AUTHORITY:*

\$ 515,000.00

COMMENTS: The site is high risk for the groundwater ingestion pathway. The water table is deep (~30 ft) and contamination appears to have spread over some distance. Corrective action was completed in 2003 with the installation of two private association wells to serve multiple affected parties, and one public well for the use of a local restaurant. Due to siting requirements, the public well was placed on private land with a 10-year lease, with an option to renew for an additional 10-yr period. The lease expired in 2013 with no action taken by the lessee. The landowner is now asking the well to be removed and thus the lessee will soon no longer have access to a source of potable water.

Since installation of the well was considered corrective action and as the lessee cannot install a well on his property, a new water source is needed. The best option is to install a new water main to connect to the East Association well then install a new well next year. Authority is requested to provide for the water line and new well; costs will be shared with the claim for site # 8811618 – Woodbury County School District. Affected population less than 100.

*Previous approval + additional recommended

Site Timeline

1986 - The claimant / current property owner purchased this property and had the USTs removed.

1992 – An evaluation of the site area was initiated after detection of contamination in one or more private drinking water wells. The initial investigation was funded by an Iowa DNR LUST Trust investigation

1992 – 1997: Site investigation activities were completed to identify plume location and evaluate corrective action options. The site was determined to be a high risk based on a 1996 pre-RBCA SCR. DNR determined corrective action not feasible due extent of contamination and proximity to receptors.

1997 - 2003: Site investigation activities were completed through a State Lead Community Remediation Project started. In 1997, water treatment units were installed due to the detection of benzene in two private wells. In 1999, two additional private wells were found to be contaminated requiring installation of treatment units.

2000 – 2003 – Multiple discussions held on options to address area contamination; due to lack of a governing body, lack of a public water supply nearby, and lack of options to treat contamination at depth, the decision was made to install two private water supply wells for the property owners in the area and a public water supply well for the local restaurant. Several public meetings in the community were held to discuss the options and present the plan.

2003 - The East and West Association wells and one public drinking water well were installed; the private wells were designed to serve no more than 25 individuals per well. Due to poor water quality, all residents connected to the East Association well were offered and most were provided water softeners and iron removal systems.

2004 - Several of the previously impacted or threatened drinking water wells were plugged; property owners were told all remaining wells could only be used for non-potable water.

2005 – present – Annual monitoring of this site has been completed. The claimant at some point chose to disconnect from the East Association well and reconnect his owned properties to one or more of the pre-existing water wells; one of which is considered to be a high risk receptor.

**Contracts Entered Into
Since September 24, 2015 Board Meeting**



IOWA UNDERGROUND STORAGE TANK FUND

Douglas M. Beech, *Chairperson*

Dale T. Cira, *Administrator*

Board Members: Michael L. Fitzgerald Joseph D. Barry Jeff. W. Robinson Karen E. Andeweg Chuck Gipp
 Timothy L. Gartin Dawn M. Carlson Patricia J. Beck N. Kurt Mumm

MEMORANDUM

TO: UST Board Members
FROM: Dale Cira
DATE: October 21, 2015
SUBJECT: Contracts Entered Into Since September 25, 2015 Board Meeting

The Board entered into two contracts since the September 24, 2015 meeting:

- 1) A contract with Aon Risk Services Central, Inc. for the administration of the Program for calendar year 2016.
- 2) A contract with Geotek Engineering & Testing Services, Inc. for continued services on CRPCA 1007-40: Akron through December 2016.

Other Issues as Presented

Correspondence and Attachments

Notes of Fifth Corrective Action Conference Iowa Department of Natural Resources (DNR)

Held: Friday, September 18, 2015 at 9:30 in room 5W of the Wallace Building
Site: Valley Restaurant/Sierp Oil in Villisca, Iowa
LUST No. 7LTY50
Status: This was the fifth conference; no further conferences are scheduled.
Synopsis: Groundwater sampling has determined the former Valley Restaurant site is the source of the groundwater contamination that has reached City Water Well #8 via a diving plume. At the last conference, all participants agreed that a new DWW (drinking water well) will be needed to replace Well #8 that is currently treated by a temporary system. The certified groundwater professional (CGP) provided a report titled *Drinking Well Test Borings & Pumping Test Results-Teleconference Report* which stated that four test borings were drilled. For Test Boring #4, "Pumping test data is still being evaluated at this time but the hydrogeologist has verbally reported that the test well was able to produce at least 60 gpm. At this time water quality data is still being analyzed by the laboratories." These results are encouraging.
There was much discussion of how to expedite a lease from the land owner, further testing, the DWW permit, running pipe, etc., with the aim of having a replacement DWW on line by 4/15/16. Well #8 would be retained in case it is needed. The CGP proposed a Tier 3 monitoring plan and the next site monitoring report (SMR) submittal by 12/31/15.

Participating

RP: Kyle Kruidenier, attorney with Sullivan and Ward, for Sierp Oil (in person)
Funding: Steve Reinders of Cunningham Lindsey and James Gastineau of Aon (by telephone)
CGP: Adam Davison of Seneca Environmental (in person)
DNR: Shelly Nellesen, Project Manager; Elaine Douskey, Section Supervisor; Jeff White, Conference Facilitator, all of Underground Storage Tank (UST) Section (in person)
Keith Wilken and Jessica Montana of DNR Field Office 4 (FO4) (in person)
Taroon Bidar and Ann Lynam of DNR Water Supply Section (WS) (in person)
City of Villisca: Chad James, Utilities Superintendent and Trisha Owen, City Clerk (in person), Austin Smith, City Engineer with Garden & Associates (Engineer) (in person)

Funding Report by Steve Reinders of Cunningham Lindsey (CL)

- \$729,348 has been reimbursed to date; another \$35,000 will be billed soon.
- Settlement between Fund and RP determined that 3% of costs are attributable to aboveground storage tanks (ASTs) and must be covered by RP.
- The site received spending authority to \$1,000,000 at a recent UST Fund Board meeting.

Background by Adam Davison, CGP

- Test Borings #1, 2, and 3 were drilled in August with unfavorable results.
- Test Boring #4, located approximately 2,000 feet north of the site, was acceptable; a test well was installed and a pumping test run.
- The *Drinking Well Test Boring & Pumping Test Results-Teleconference Report* indicates the test was encouraging: the test well was able to produce at least 60 gpm. Water quality data is still being analyzed by the laboratories.
- We have looked into modeling the risk to the well field. However, this is very expensive and might not be very reliable. Instead we propose a network of monitoring wells screened within the deep aquifer to monitor how/if the plume is moving. Monitoring on a quarterly or semi-annual basis will help evaluate if the plume is shrinking and/or mobile.

- We should leave #8 hooked up but not pumped. If the contamination plume is seen to move farther into the well field, DWW #8 could be run to serve as an interceptor or control well.
- I recommend we move forward with the installation of a new city water well and begin the Tier 3 monitoring.

Discussion

FO4: Can we get 200 feet of control around a proposed new well, as is required?

City: It is likely that we can get control. The property owner likes this well location better than the others.

Water Supply: Get the permit form to us as soon as possible. It normally takes 60 days, but we can do it in less.

FO4: The next step is to do a site survey; we will conduct this once we receive a request from WS.

Engineer: If everything goes well, we could drill and install the water well in December.

City: We will call the new DWW City Well #12. Do we need to be concerned about the anhydrous problem at the UFMC coop?

FO4: They are an active station and were a LUST site. I will find out about a possible nitrate plume.

City: We will need additional water wells after this one. There are potential well locations to the north of this proposed well.

DNR: The permit from Water Supply for the temporary air stripper treatment system expires at the end of September. Could that be extended through October?

Water Supply: Perhaps. We will need a letter requesting an extension before we would grant one.

CGP: If we could leave it on until the end of October we might be able to collect some samples while DWW-8 is pumping.

DNR: There are several high risk receptors. Most will likely be taken care of through monitoring onsite; groundwater concentrations are fairly low. Seneca has proposed a Tier 3 approach to evaluate the risk to the city wells. We will work out the details of this plan via email. Tier 3 site monitoring reports (SMRs) will be required semi-annually. Well #8 could be used to capture the plume if it looks like the plume is moving toward an active well.

Engineer: Yes, we should keep #8, but it can be disconnected from the city water system.

CGP: Maybe we could designate it as a non-drinking water well with a higher target level.

Selected Actions and Schedule

- DNR sends out conference notes by 9/24/15.
- By 9/25/15, CGP sends out a proposal and budget.
- CL evaluates the proposal and budget by 10/2/15.
- CGP installs new monitoring/piezometer wells and samples monitoring wells by December 2015.
- City well #12 is drilled and installed by December 2015. If possible, piping to the city water system is installed before winter.
- CGP provides a site monitoring report (SMR) by 12/31/15.
- City water well #12 is pumping and piped to the city water system by 4/15/16.

Everyone agreed to this approach and schedule.

Shelly Nellesen, DNR Project Manager

Jeff White, Conference Facilitator

Note: These notes are generalizations of ideas and comments made by participants in the meeting. They were not recorded verbatim or transcribed. If you have any questions or suggestions, please contact Shelly Nellesen at the UST Section of the DNR.

**Notes of Sixth Corrective Action Conference
Iowa Department of Natural Resources (DNR)**

Held: Tuesday, October 6, 2015 at 11:00 in room 5W of the Wallace building
Site: Former Ivy's Liquor (Nguyen Liquor), Sioux City
LUST No. 7LTP71
Status: Sixth conference; no further conferences are scheduled.
Synopsis: The site is classified high risk for soil with free product historically in multiple wells across the site, primarily in area of the former tank basin on the northeast corner of the site. A multi-phase extraction (MPE) system has operated at the site since 2008 with surfactant injection in 2013 and two laser-induced fluorescence (LIF) events. In 2016 the Iowa Dept. of Transportation (DOT) is scheduled to widen the adjacent highway and plug and destroy several of the monitoring and remediation wells.
The certified groundwater professional (CGP) will provide a site monitoring report (SMR) by 10/9/15 and focus remediation on areas of free product. He will conduct system maintenance and prepare to move the remediation trailer.

Participating

RP: Did not participate.
Owner/Fund Benefit Recipient: Kent Frohock
Funding: Steve Reinders of Cunningham Lindsey (CL) (by phone)
CGP: Dan Ruppert of Northwest Environmental (by phone)
DNR: Ruth Hummel, Project Manager, & Jeff White, Facilitator (in person)

Funding Report by Steve Reinders of Cunningham Lindsey (CL)

- \$511,476 spent to date.
- The site has spending authority to \$600,000 with a spending cap of \$1,000,000.
- We might have to go to the UST Fund Board for additional spending authority.

Questions and Statements by Ruth Hummel, DNR Project Manager

- The latest SMR is due here this week.
- We have made good progress here, but MW-7 and MW-28 still have free product. Product reappeared in MW-7 after the MPE system was shut down for several months in 2015.
- It appears DOT is going to need to destroy many of the monitoring and remediation wells, including MW-7. What can we do to maximize treatment of the free product before?
- Sioux City installed a new sanitary sewer main in the street. Where is it located? How big and how deep? We will evaluate remaining risk after the free product is addressed.

Discussion

CGP: The new sanitary sewer main is 27 feet deep and 24 inches in diameter. I'll find out the exact location and provide it in the SMR. I was there during the trenching and took soil samples for PID evaluation. PID readings were very low to nondetect and we did not otherwise see any evidence of contamination in the soil removed during the trenching. Based on the screening results soil samples were not submitted for lab analysis and soil did not need to be disposed of due to contamination.

If the weather is good in January 2016, DOT they could start work on the intersection. They will likely want to plug the wells first thing.

DNR: It is our understanding that DOT will let bids in November. They would prefer not to have wells in the new paved roadway, but we might get to re-install some wells. What can we do before the work starts?

CL: The system used to discharge 12,000 gallons per month, but in the last 9 months has discharged only 11,000 gallons. What's wrong?

CGP: We need to do some long-delayed maintenance on the remediation system right away, including pipe and air stripper cleaning and replacing a float valve on the separator. I'll get a proposed cost into the Fund very soon. This will speed up the treatment system.

DNR: According to the table in the latest report, the drop tube in RW-13, near MW-7, is set at 27.5 feet. The LIF data shows the contamination starts at 34 or 35 feet deep. RW-13 is only about 36 feet deep, but you should put the drop tube as deep as possible to remove as much free product as possible.

CGP: Most of the recovery wells get sand and gunk in them, so I don't know how deep we can go. We could clean them out with a vac truck as part of the maintenance; I think we still have some funds for that.

MW-28 is being treated with soil vapor extraction (SVE) only. We will hook it up with a drop tube.

DNR: Since we will likely lose MW-7, you need to hit that well hard right away. Rehab the system and focus on treating RW-13. Also accelerate treatment of MW-28, but it looks like you can continue to treat MW-28 after the other wells are plugged. What other wells do you recommend using for treatment?

CGP: We can focus right away on monitoring well MW-7 by increasing treatment in RW-13. We will install a drop tube in MW-28. Other recovery wells such as RW-1, RW-2, and RW-3 should get additional treatment, too. It looks like we will likely need to move the remediation system equipment enclosure too. We might be able to move it closer to the building but it would be tight. It looks like we may lose some of the remediation system wells and piping to the south if they need to dig deeper than 3-4 feet as part of the construction. If we can get a copy of the DOT bid package it would help us better understand the extents of the proposed highway work.

DNR: We will send a memo to DOT explaining the situation and asking for re-installation of monitoring wells and remediation wells in the construction area that are still being used for free product recovery or monitoring. Of those in the proposed construction area the most important wells appear to be the free product compliance monitoring well, MW7, and nearby recovery wells RW13, MW35, and MW29, but the other monitoring and remediation wells may be needed too based on conditions at shutdown and after site stabilization. Also note that the remediation system is still needed so if it is in the way of construction it would have to be relocated so it can continue to run.

Selected Corrective Actions and Schedule

- DNR provides notes of the conference and a memo for DOT by 10/9/15.
- CGP provides an SMR by 10/9/15.
- CGP conducts needed maintenance on the remediation system by 10/16/15.
- CGP will focus immediate treatment on the areas of MW-7 and MW-28.
- CGP will keep everyone updated on project status.

Everyone agreed to this approach and schedule.

Ruth Hummel, Project Manager
Jeff White, Conference Facilitator

Note: These notes are generalizations of ideas and comments made by participants in the meeting. They were not recorded verbatim or transcribed. If you have any questions or suggestions, please contact Ruth Hummel at the UST Section of the DNR.

Claim Information



IOWA UNDERGROUND STORAGE TANK FUND

Douglas M. Beech, *Chairperson*

Dale T. Cira, *Administrator*

Board Members: Michael L. Fitzgerald Joseph D. Barry Jeff. W. Robinson Karen E. Andeweg Chuck Gipp
 Timothy L. Gartin Dawn M. Carlson Patricia J. Beck N. Kurt Mumm

MEMORANDUM

TO: UST Board Members
FROM: Dale Cira
DATE: October 21, 2015
SUBJECT: Claims Information

The following is a list of claimants with 3 or more open claims:

<u>Claimant</u>	<u># Claims</u>
Casey's Marketing Co.	23
Krause Gentle Corp. (etc.)	12
Kwik Trip, Inc.	8
Country Stores	5
Bulk Petroleum Co.	4
Fauser Oil or Fauser Transport	4
Kwik Shop	4
Midway Oil (Gary's Realty)	4
Molo Oil Co.	4
Elliott Oil Co.	3
Mulgrew Oil Co.	3
Total Petroleum, Inc.	<u>3</u>
	77

Summary of claims by claimant

Claimants with 3+ claims (12)	77
Claimants with two claims (27)	54
Claimants with one claim	318
No further action re-opener sites	<u>13</u>
	462 claims