

Environmental, Health & Safety Management System (EMS)



EDF Emergency Response and Remedial Action Plan

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1. PURPOSE

To facilitate an integrated EMS, this procedure has been written in accordance with ISO 14001, OHSAS 18001, R2:2013 and Iowa EMS standards.

The purpose of this procedure is to establish a process for identifying and responding to Emergency situations. The Commission educates staff on the Waste Commission of Scott County's Environmental Health & Safety (EHS) policies, to motivate and encourage employees to practice environmental stewardship, and safety by raising awareness and sensitivity to environmental issues through Commission policies, regulations, training, and interactive dialogue.

2. SCOPE

This procedure addresses operations and activities that can have a significant impact on the environment, and the health & safety of Commission employees. It applies to Commission employees engaged in Commission-related work activities within the Environmental Health & Safety Management System (EMS) fence line.

3. FACILITY INFORMATION AND CONTACTS

- 3.1 Permitted Agency:
 - Waste Commission of Scott County (Commission)

3.2 DNR Permit Number:

• 82-CRT-01-04-CRP

3.3 Emergency Response Coordinator (ERC) and Contact Information:

Kathy Morris, Director (ERC)
 Waste Commission of Scott County
 11555 110th Avenue
 Davenport, Iowa 52804

Phone: 563-381-1300 Mobile: 563-349-0038 Fax: 563-381-1301

E-mail: kmorris@wastecom.com

• Special Waste Manager:

Bryce Stalcup

Mobile Phone: 563-349-3921

• Operations Manager:

Brian Seals

Mobile Phone: 563-349-7890 Home Phone: 309-737-6651

Special Waste Coordinator:

Spencer Brothersen

Mobile Phone: 563-320-3644

- 3.4 Medical Services
 - Emergency

0 911

Non-emergency

o Company nurse: 888-770-0928

- 3.5 Primary Emergency Equipment Inventory
 - The following major equipment is present and operational at the Electronic Demanufacturing Facility:

Equipment	Description
Solid Tire	Caterpillar 924G
Loader	
Forklift	Komatsu 25
Shredder	SSI Quad
	Shredder

Fire Hydrants and Water Sources

- Southeast corner of the Electronic Demanufacturing property. Cul-de-sac on 59th St. Near the front entrance of the Scott Area Recycling Center.
- Off-Site Equipment Sources (See attachment 1)

3.6 Facility Description:

• The Electronic Demanufacturing Facility (Facility) is located at 1048 East 59th Street, Davenport, Iowa 52807.

3.7 Site and Environs Map:

- See Attachment at end of document for area map
- See EDF Safety Map, for locations of exits, fire extinguishers, spill kits, emergency alarms, air horn, and tornado shelter.

4. EMERGENCY CONDITIONS – RESPONSE ACTIVITIES – REMEDIAL ACTION

4.1 Identifying potential Emergency Situations

Potential Emergencies and accidents are monitored on a continual basis.
 Examples of how this is accomplished is as follows: Hazardous Communication training, Aspects and Impact updates, internal/external/staff audits, JSA review, PPE review, facility walk-throughs, and safety committee exercises.

4.2 Emergency Response Guide

• An Emergency response guide has been created to streamline the action time in the event of an emergency.

4.3 SDS Binders and Website

SDS binders are located at each facility as outlined in the Hazardous
 Communication plan. SDS sheets are managed through SDSbinderworks.com

which is available to all staff at all times. This serves as another reference in the event of an emergency situation.

- 4.4 Procedures for reporting emergencies:
 - Office personnel that receive a message by radio, cell phone, intercom, etc...that an emergency exists should call emergency services 911:
 - Information required when calling 911:
 - Your name and Waste Commission of Scott County.
 - Give a description of the emergency.
 - Location of the emergency (1048 E. 59th Street)
 - How contact can be made at the scene.
 - DO NOT HANG UP, unless instructed to do so or personal safety is jeopardized.
 - Once emergency services have been contacted, office personnel will contact an Emergency Response Coordinator (ERC) if one has not already been notified. Tell him or her about the incident and where it is located.
- 4.5 Emergency Response Coordinator Procedures
 - Maintain the area around the accident site to keep it free from unnecessary personnel and traffic congestion. Post physical barriers if necessary.
 - Position a Commission employee at the entrance to the facility to direct emergency personnel to the area.
 - Setup a command area.
 - Account for all personnel.
 - Obtain SDS, if applicable.
 - Coordinate containment activities if safe to do so until the Fire Department arrives.
 - Assign other duties as needed.
 - At the end of the emergency, notify all appropriate agencies; EPA, DNR, etc...and complete all necessary reports.
 - Once on site the Fire Department's Incident Commander will be in charge of the situation. The ERC will be available for questions or to provide assistance as needed.
 - The Fire Department's Incident Commander will assess the need to notify or evacuate neighboring residents and businesses. The plan for notification and evacuation is the Fire Department's responsibility.
- 4.6 Incident Report Form
 - When an incident occurs an incident report must be filled out in accordance with the Internal Communication Procedure.

- 4.7 Procedures for emergency evacuation, including type of evacuation and exit route assignments:
 - In the event of an emergency situation requiring evacuation of the Facility, all personnel will travel via the most direct route to:
 - Emergency Assembly Area west of Recycling Center main office parking lot just south of EDF.
 - Always evacuate to a spot upwind from spills or smoke plumes even if the designated meeting location needs to be changed.
 - The Facility Supervisor will determine if any employees should remain to complete critical operations before they evacuate. If required, the Facility Supervisor will instruct employees on critical operations and when to evacuate.
 - For employees performing rescue or medical duties
 - o Concentrate on preventing further damage and/or possibility of harm.
 - o Attempt rescue only if there is no imminent danger.
 - o Summon first-aid equipment and the rescue squad.
 - o If there is imminent danger, evacuate the scene immediately and seal off the area.
 - Fire and chemical alarms are used in the facility as well as cell phones/radios to alert employees of possible dangers.
 - Emergency Equipment at the Facility Includes:
 - o ABC dry chemical fire extinguishers, including office area
 - Spill control and clean-up materials maintained within the warehouse areas
 - o First-aid and basic medical supplies in the break room
 - AED on campus
- 4.8 Procedure for post-accident evaluation
 - The ERC, site managers, and emergency personnel will meet to discuss the incident and next steps.
 - An incident report will be filed by the ERC and action will be taken in accordance with the Internal Communication procedure
- 4.9 Failure of Utilities
 - Short-Term (48 hours or less)
 - With any loss of electrical power, MidAmerican Energy should be contacted at 888-427-5632. Loss of electrical power should be

investigated before contacting the utility company. If an electrical storm is not evident, the largest cause of short-term power loss, Facility staff should attempt to identify the potential cause of the outage. Some possible causes include:

- Downed power lines
- Transformer malfunction
- Circuit breaker tripped (internal and external)
- Power grid failure
- During a short-term power outage collecting Ewaste from customers will continue. Processing of Ewaste will be discontinued until power is restored.
- Upon return of electrical power, the computer weighing system will be checked for integrity and the manual tickets will be entered into the system for billing purposes.
- o Short-term interruption to gas service should not be of major concern.
- Long-Term (over 48 hours)
 - Long-term interruptions in electrical power are unlikely. However, should this occur, a portable generator will be used to provide electrical power.
 All manufacturers' recommendations regarding the safe use of auxiliary generators will be followed until power is restored.

4.10 Weather Related Events

- Tornado
 - Tornadoes are common in Iowa, especially between May and August.
 They generally are associated with severe thunderstorms, which develop along rapidly advancing cold fronts. The funnel associated with tornadoes sometimes remains in the clouds. However, when the funnel dips to the ground, destruction can take place as winds can exceed 300 miles per hour (mph).
 - The National Weather Service issues tornado watches and warnings. A tornado watch means conditions exist for tornadoes to develop. A tornado warning means a tornado has been sighted visually or by weather radar. Because tornadoes move so rapidly (25 to 60 mph), little time may be available to take any action other than seeking cover. Preparations for seeking cover should begin once a tornado watch is issued indicating that the right conditions exist for tornado development.
 - Appropriate action by Facility Supervisor or designee is:
 - When the tornado watch is issued, continue normal operations.
 Listen to the radio to keep track of developments. Alert the Scale Operator, Director, Special Waste Manager and customers using the site that a tornado watch has been issued.

- If a tornado is sighted, seek shelter immediately in the restrooms or the restroom hallway. Wherever you take cover, protect your head and eyes.
- If unable to take shelter indoors, move away at right angles to the path of the tornado. Tornado tracks are almost without exception in an easterly direction.
- Lie flat in the nearest ditch or ravine if there is not time to escape.
 Protect your head with your hands.
- Do not try to outrun a tornado by car or truck.

Windstorms

- Windstorms are common in Iowa and may or may not be associated with an approaching storm. High winds can be as dangerous as tornadoes.
 Safety precautions during high wind events should be as during a tornado event.
- o High winds during the winter have additional concerns including:
 - Reduced wind chills
 - Blowing and drifting snow
 - Taking precautions to limit skin exposure
 - Regular plowing/snow clearing

Intense Rainstorms and Erosion

 Intense rainstorms and erosion are not a concern at the Facilities since all operations take place under a canopy or indoors.

Lightning Strikes

- Besides causing fires, lightning strikes are dangerous due to the chance of severe or fatal electric shock. The danger is highest just before rainfall begins. The following safety rules should be obeyed if lightning threatens:
 - Stay indoors. Do not venture out into exposed areas.
 - Stay away from open doors, windows, chimneys, metal pipes, sinks, and plugged in electrical devices.
 - Do not use plug-in equipment and appliances such as air conditioners, trouble lights, welders, and two-way radios.
 - Do not use the telephone except for emergencies.
 - Do not work on metal objects outside such as containers and vehicles.
 - Do not handle flammable materials.
 - If caught in rubber-tired vehicles, stay in the vehicle with all metal parts (such as loader buckets) lifted off the ground.
 - If caught in a metal wheeled or tracked vehicle, shut down the engine and dismount; seek shelter in buildings, low areas, or rubber-tired vehicles.

- If there is not a shelter nearby, find a low spot and assume the safety position. The safety position consists of squatting down as low as possible while keeping only the soles of the shoes in contact with the ground. The safety position minimizes ground contact area and lowers one's profile. Stay twice as far away from trees as the trees are high.
- If you feel a tingling sensation or if your hair stands on end, immediately assume the safety position.
- Personnel struck by lightning must be handled safely. If the person is unconscious or appears dead, do not move the person unless the person is in an exposed area. Apply appropriate firstaid. Contact the Fire Department (911); be sure to tell the dispatcher that the victim has been struck by lightning.

Flooding

Not Applicable

4.11 Fires and Explosions

- Discarded CRT Materials and Other Potential Fire Hazards
 - The potential fire hazard is a 250 gallon diesel tank that is located on the southwest corner, approximately 50 feet from the building. It is secured and locked with a hydrant nearby. There are no potential ignition sources with the diesel tanks outdoor location. No flammable materials inventoried. Any materials of combustible nature would be extinguished by either handheld fire extinguishers or the sprinkler system in the building.
 - CRTs are not regarded as a flammable material. However, fire prevention activities will be provided by Commission employees. Fire extinguishers are located throughout the building. These extinguishers can be effectively used on small fires at the Facility. All Facility personnel receive periodic fire extinguisher training. The Facility Supervisor is responsible for maintaining equipment to prevent or control sources of ignition or fires; and
 - All employees are informed of fire hazards along with fire prevention during HazCom training, fire extinguisher training and ERRAP training.
 - All employees should be on the alert for any indication that a load of CRTs are smoldering and about to ignite. If a smoking or smoldering load is observed after being unloaded, the CRTs should immediately be extinguished and/or removed from the Facility, if possible, and isolated for evaluation.
 - Evaluate the situation, only if safe to do so, for what is on fire, size
 of fire and any other conditions that may affect the situation.

- If appropriate, first attempt to detain the fire with a water hose or fire extinguisher. If fire becomes too large to detain quickly, contact the fire department and evacuate.
- If deemed unsafe immediately evacuate the area. Use all means necessary including, but not limited to, pulling the fire alarm.
- Notify the office by radio, cell phone, or intercom and inform them about the fire and where the fire is located.
- All waste that is coming in for disposal while the fire is being detained should be redirected to the landfill or recycling center for safe and secure storage.
- o If safe to do so, help injured Commission employees or customers:
 - Employees helping victims and/or administering first aid should protect themselves against direct contact with blood, chemicals or contaminated clothing or material.
 - If chemicals are involved, discard all chemical-soaked clothing. If contaminated, flush eyes or skin with water for fifteen minutes. Do not attempt to neutralize materials in the eyes or skin, as this will compound the problem. If injuries appear to be due to chemical exposure, identify the chemicals that are involved and review the appropriate material safety data sheets if available.
 - Protect victims from exposure to the elements.
 - Evacuate casualties to a medical facility as soon as possible. Notify the medical facility of the casualty's condition and the chemicals involved if any. Offer MSDS information if needed.
- Office personnel that receive a call will follow: Section C. "Reporting Emergencies"
- Burnt residential electronic waste will be evaluated for proper disposal/recycle.
- Commission personnel meet with local fire department officials to discuss fire protection issues. The meetings should be used to discuss needs and establish/reconfirm the agreed upon protocol for the fire protection support, facility access, call procedures, and methods for controlling any fires.
- Buildings and Site
 - Structural Sites
 - Regardless of the size of the fire, always take the following actions:
 - Call the Fire Department (911). Give the dispatcher the location of the fire and type of fire, if known. If you are unable to call, get someone else to call.
 - Try to put the fire out with extinguishers.
 - Close all doors and windows to prevent drafts.

- Evacuate any occupied structure in accordance with the evacuation plan.
- Remove vehicles from the building before closing it up, if time allows, and if it is safe to do so.

Field and Brush Fires

- Call the Fire Department (911). Give the dispatcher the location of the fire and type of fire, if known. If you are unable to call, get someone else to call.
- Try to put the fire out with extinguishers.

Equipment

- Vehicle Chassis Fires
 - The occurrence of vehicle fires can be minimized by proper preventative maintenance and cleanliness. If a fire occurs, take the following actions:
 - Call the Fire Department (911) or contact the main office to do so.
 - Activate the automatic extinguishing system (if so equipped); evacuate the vehicle after putting on the emergency brake and turning off the ignition and battery disconnect switch.
 - Use the fire extinguisher mounted on the vehicle and attempt to put out the fire.
 - Move all nonessential vehicles and individuals away from the burning vehicle and seal off the area. Have someone stationed at the entrance to direct fire fighters to the scene of the fire.
 - Use water or other fire equipment to put out the fire and keep it from spreading.
- o If personnel are trapped or unconscious in the vehicle:
 - Concentrate on preventing the fire from spreading to the cab.
 - Attempt rescue only if there is no danger of a fuel explosion.
 - Summon first-aid equipment and the rescue squad.
 - If there is imminent danger of a fuel explosion, evacuate the fire scene immediately and seal off the area.
- Fuels (including oil, grease and other liquids)
 - Use fire extinguishers or a hose with fog nozzle to put out the fire. Do not use a stream of water (such as a hose without a nozzle), which can spread the fire
 - o If using an extinguisher, aim at the base of the fire.
 - o If using a fog nozzle, try to smother the fire by aiming above it.
 - Concentrate on keeping the fire from spreading to other liquids, welding tanks, vehicles, and buildings.

Utilities

- Electrical Fires:
 - Shut off the power.
 - Use dry-type extinguishers only. DO NOT USE WATER on electrical fires.
 - Do not try to pick up and move wires or electrical devices involved in the fire.
 - Do not touch metal objects in contact with wires or electrical devices involved in the fire.

Propane

- Fires involving propane are very dangerous. If a fire involving propane is detected, take the following precautions:
 - Evacuate the area. Propane tanks can explode.
 - Contact the Fire Department by dialing 911.
 - Under NO circumstances try to extinguish the fire or turn off the gas supply. Leave that to the properly trained responders.

Working Area

See section Fires and Explosions – Discarded CRT Materials

Evacuation

- In the event of an emergency situation requiring evacuation of the Facility, all personnel will travel via the most direct route to the Scott Area Recycling Center main office parking lot on island, just south of EDF.
- 4.12 Regulated Waste and Hazardous Material Spills and Releases.
 - A Commission employee that recognizes that a chemical emergency exists will do the following:
 - Evaluate the situation, only if safe to do so, for what has spilled, how much has spilled and any other conditions that may affect the situation
 - o Immediately evacuate the area if a chemical spill has occurred. Use all means necessary including but not limited to pulling the fire alarm.
 - o Immediately call a trained spill response staff member to evaluate the situation unless emergency personnel are needed, then call 911.
 - Notify the office by cell phone, radio, etc....and inform them about the emergency and where the emergency is located.
 - If safe to do so help injured Commission employees or customers.
 - Employees helping victims and/or administering first aid should protect themselves against direct contact with blood, chemicals or contaminated clothing or material.
 - If chemicals are involved, discard all chemical-soaked clothing. If contaminated, flush eyes or skin with water for fifteen minutes.
 Do not attempt to neutralize materials in the eyes or skin, as this

- will compound the problem. If injuries appear to be due to chemical exposure, identify the chemicals that are involved and review the appropriate material safety data sheets if available.
- Protect victims from exposure to the elements.
- Evacuate casualties to a medical facility as soon as possible. Notify the medical facility of the casualty's condition and the chemicals involved if any. Offer MSDS information if needed.
- Office personnel that receive a call will follow: Section C. "Reporting Emergencies"

Broken CRTs

- A Commission employee that recognizes a broken CRT spill will do the following
 - Evaluate the situation, only if safe to do so, for what has spilled, how much has spilled and any other conditions that may affect the situation.
 - Immediately begin spill cleanup procedures if trained and comfortable. If not comfortable notify the supervisor.
 - Put on proper PPE
 - Pick up broken pieces of CRT glass and place in a tote with a lid or in an outbound CRT Gaylord.
 - The area can then be wiped with a damp cloth, wet mopped or vacuumed using a vacuum containing a HEPA filter.
 - Place cloth/mop/material in a designated container
 - If the broken tube is small enough, place in a tote prior to demanufacturing to prevent release or place on the conveyor if contained.
 - If the broken tube is large and can be safely contained (i.e. broken glass has fallen inside the tube), place the broken tube on the conveyor belt/roller line.
 - If the broken tube is large and cannot be safely contained, place tube into an outbound CRT Gaylord and ship whole, or put on contained conveyor.

Failure of Dust Collection System

- A Commission employee that recognizes a failure of the lead dust system will do the following:
 - Evaluate the situation, only if safe to do so, for what has spilled, how much has spilled and any other conditions that may affect the situation.

- Immediately sound the dust spill Air horn located near the bag house only if safe to do so
 - Staff is trained to immediately evacuate the building when the air horn is sound.
 - Notify trained personnel
- Trained personnel will follow proper procedures and dawn required PPE.
- PPE includes: glasses, gloves, respirator, Tyvek
- Use the vacuum with HEPA filter to clean up the dust
- Once all the dust is vacuumed, remove bag and place in lead dust drum
- For small spills use a wet wipe to clean the area. For large spills use lead soap, water and absorbent pads.

4.13 Angry, potentially escalating situation.

- If an angry, potentially escalating situation occurs do the following:
 - Signal a co-worker/or other persons of a problem and the need for assistance.
 - Stay calm. Attempt to treat the individual with respect and dignity.
 - o Listening is the key. The angry person wants to be heard.
 - Agree where appropriate. Tell them you understand why they are upset, and you will try to help get things resolved.
 - No bystanders. Give the angry person "special attention" by taking them to a quiet, private place.
 - Keep to the subject. Let the primary complaint/subject be the topic of discussion.
 - Speak in a clear, slow, steady, soft voice. Avoid glaring, staring, etc.., the angry person will mirror you.
 - Ask questions. Let them do most of the talking.
 - If nothing helps, and the situation escalates, excuse yourself for a moment, notify a supervisor or manager or call for emergency help.
 - Report the incident immediately to the ERC verbally, followed up by a written incident report within one day of the incident.

4.14 Waste Services in the event of an Emergency

- Communications
 - During an emergency, internal communication via cell phones and on-site radios will be conducted as normal. External communication with news media, Board Members and the public-in-general (not customers) will be conducted by the Director or designee. Requests for comment or information from the media shall be directed to the Director or designee.
- Temporary Discontinuation of Waste Services Short and Long-Term

- Temporary discontinuation of services could occur due to improper disposal and handling of hazardous waste. Should this occur, signs will be posted at the gate informing customers of the temporary closure.
- Contact with customers shall be conducted at the direction of the Director. The Director shall contact Board Members and the media.
- Facilities Access and Re-routing
 - During an emergency on-site traffic will be kept at a minimum. Direction will be given by Commission personnel or the incident commander.

Waste Acceptance

 Depending on the nature of the emergency, waste acceptance may be prohibited. The respondents to the incident and the Director, WCSC will determine the nature and extent of the emergency and the ability for the site to accept wastes. Notification to customers will be essential to minimize further environmental mishap. Signs will be posted at the site informing customers of an alternative disposal site.

5. EMERGENCY AND RELEASE NOTIFICATIONS AND REPORTING

5.1 **Federal Agencies**

Environmental Protection Agency, Region 7

901 North 5th Street Kansas City, KS 66101

Phone: 913-281-0991

National Pesticide Telecommunication Network

Phone: 800-858-7378

National Response Center

U.S. Coast Guard Headquarters 2100 2nd Street, SW, Room 2611 Washington, DC 20593-0001

Phone: 202-267-2675 Phone: 800-424-8802

• Emergency Planning and Community Right-to-Know Information Hotline (EPCRA)

EPCRA Information Hotline Booz Allen & Hamilton, Inc. 8283 Greensboro Drive McLean, Virginia 22102

Phone: 703-412-9810 Phone: 800-535-0202 Phone: 800-553-7672 (TDD)

United States Department of Transportation (DOT)

Phone: 202-366-4000

United States Environmental Protection Agency (EPA)

Office of Solid Waste Phone: 800-223-0425

5.2 State Agencies

• Iowa Department of Natural Resources

Spill Notification
Wallace State Office Building
502 E. 9th Street
Des Moines, Iowa 50319
Phone ending June, 2015: 515-281-8694

Phone effective July, 2015: 515-725-8694

• Iowa Department of Natural Resources

Field Office No. 6 1023 W Madison Washington, Iowa 52353-1623

Phone: 319-653-2135

5.3 County and City Agencies

• Law Enforcement

Scott County Sheriff Department

Emergency: 911 Non-Emergency Phone: 563-326-8625

Medical Emergency

Genesis Medical Center 1227 E. Rusholme Street Davenport, IA 52803 Emergency: 911 Non-Emergency

Phone: 563-421-1100

MidAmerican Energy

Gas Emergencies

Phone: 888-427-5632 Electrical Emergencies Phone: 888-427-5632

• City of Davenport - Public Works

Phone: 563-326-7923

Fire Marshall

Emergency: 911 Non-Emergency Phone: 515-725-6145 Fire Emergency: 911

• Scott County Health Department

Phone: 563-326-8618

After hours phone: 563-388-3661

5.4 Emergency Response Agencies and Contact Information

• Scott County Emergency Management

Phone: 563-484-3050

5.5 News Media

- The Director or designee, will review the situation, evaluate the options, and recommend who should be contacted.
- 5.6 Public and Private Facilities with Special Populations within Five Miles
 - None
- 5.7 Reporting Requirements and Forms
 - Emergency and release notifications are processed through the Commission
 Director or designee. The forms may vary depending on the emergency and/or
 release reporting requirements. Employees are directed to the appropriate plan
 regarding specific emergencies and releases or consult the Director where no
 specific plan is evident.

6. ERRAP Training Requirements

 ERRAP training will be conducted annually. Training and updates will be conducted as needed by qualified instructors. On-site records will record the dates of training and updates and attendees, along with the use of an electronic training records system

- Training Providers:
 - Conducted by qualified in-house employees or outside contractors familiar with waste operations.
- Employee orientation:
 - All new employees at the facility as part of their training will be trained in the ERRAP requirements.
- Annual Training Updates:
 - Training and updates will be conducted as needed, but no less than annually. Emergency drills will be conducted randomly throughout the year covering topics such as fire drills, tornado drills and spills.
- Training Completion and Record Keeping:
 - On-site records will record the dates of training and updates and attendees, along with the use of the electronic training records system.

7 CHANGE HISTORY

12/7/2017 – Removed references to Intelex

Attachment 1 Off-Site Equipment Sources

A-1 Rental Center

2411 W Central Park Avenue Davenport, Iowa 52804-2501 Phone: 563-386-0178

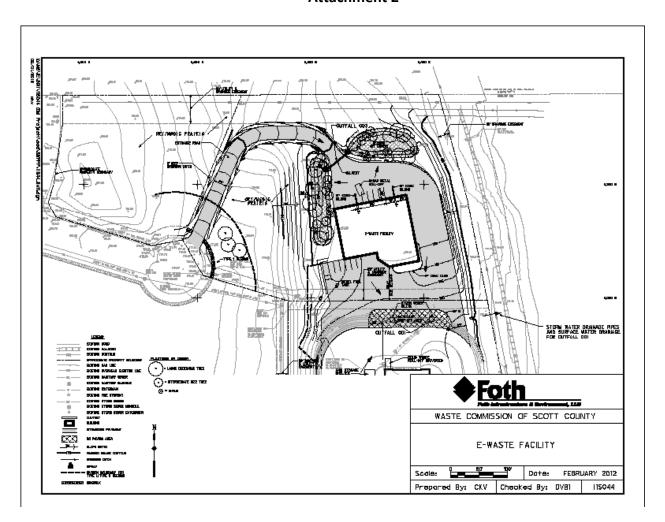
Altorfer, Inc.

4712 Buckeye Street Davenport, Iowa 52802-2313 Phone: 563-324-1935

Mid-Land Equipment Company

3136 W 76th Street Davenport, Iowa 52806-1024 Phone: 563-386-0400

Attachment 2



See Doc. No. 01292 for Internal Facility Map