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September 24, 2008

Office of the Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph Street, Suite 11-500
Chicago, IL 60601

PC 313

Postmarked 9/25/08

Re: Case # AS 08-10

Dear Illinois Pollution Control Board,

I am writing to express my opposition to the Peoria Disposal Company (PDC) request for delisting of electric arc furnace dust. I have reviewed PDC's delisting proposal, the technical report by RMT, the IEPA assessment and PDC's responses to the IPCB's questions. I am extremely concerned about the limited nature and inconclusive results of the testing on which this delisting request is based. I failed to find any evidence at all that conclusively demonstrates the safety of what is being proposed.

1. PDC never developed an unbiased representative sample of the incoming waste stream.

   Although PDC tested multiple samples representing various composites from ten different steel mills, the delisting proposal contains no descriptions of how the sampling protocol was established. EAF furnace dust is highly variable. S. Ramachandra Rao, in R*esource Recovery and Recycling from Metallurgical Waste,* 2006 explains, "The composition of EAF dust varies widely depending on the scrap used, the type of steel being made, the operating conditions and procedures...since the ratio of galvanized scrap used has been increasing, the composition of zinc and lead in the dusts has also been increasing." As U.S. and world steel demand continues to increase and the percentage of recycled steel content in EAF steel processes continues to grow, the scrap steel industry is scrambling to keep pace with supply. PDC has not provided any indication that their sampling protocol actually represents the current and future variability of EAF waste.

   Second, the samples and testing were conducted over a very short time frame – twelve days in December 2007 and a single day in February 2008 with subsequent resampling and retesting over the next ten days (RMT technical documentation page 5-1). PDC has not demonstrated that these abbreviated sampling periods are, in fact, representative of the year-round characteristics of the waste they will be processing. One obvious limitation of this abbreviated sampling is that curing only took place at low temperatures. PDC has provided no evidence that the process remains safe, without volatilization, during the higher temperatures of summer.

   Third, because PDC or its paid agents constructed all the samples, the issue of bias must be raised. Details on the sampling are not open to public scrutiny. The PDC request for nondisclosure explains, "The Appendix B confidential information contains laboratory analytical reports of untreated EAF dust, identified by steel mill." With only four parties (PDC labs, the consultant/technology owner, PDC facility director, and RMT employees) privy to the information, I question how the Illinois EPA could sign off on the delisting. Since the IEPA was not involved in designing or carrying out the sampling, there is no way the IPCB can determine whether sampling bias has skewed the results.

2. PDC included no data whatsoever demonstrating the safety of the undisclosed waste stabilization process reagents.

   The details on the waste stabilization process itself are in the redacted portion of the record. Per the PDC request for nondisclosure, "The Appendix F confidential information describes the manufacturing and industrial processes whereby PDC treats electric arc furnace dust in its waste stabilization facility, in particular, the specific chemicals used and the amounts of same." With only four parties (the consultant/technology owner, PDC facility director, PDC Vice President of Engineering, and RMT employees) privy to the information, I question how the petition could include the information required

by Illinois code 720.122 (i)(5) "A description of the manufacturing processes or other operations and feed materials producing the waste and an assessment of whether such processes, operations, or feed materials can or might produce a waste that is not covered by the demonstration." I also question how it could be effectively assessed by the IEPA.

The RMT technical document (page 3-1) does disclose that the process uses pozzolanic reagents. Wikipedia lists common sources of materials with pozzolanic properties as fly ash from coal-fired power plants (an airborne pollutant captured by scrubbers), silica fume (another coal-combustion byproduct and airborne pollutant), rice husk ash and metakaolin from oil sand operations. With no process information at all open to public scrutiny, I fail to see how the potential for air, land or water discharges can be accurately determined. I fail to understand how PDC's current operating permit issued by the IEPA can effectively regulate a process where the details are redacted from the public record and unavailable even to the IEPA.

3. PDC conducted no assessment whatsoever to determine whether curing waste atop older parts of the PDC #1 facility could potentially damage the liner/leachate collection systems safeguarding the San Koty aquifer.

   This causes me great concern. These containers are large and heavy, moved around with construction machinery, and could stay in place for as long as 60 days. This would be taking place on top of a hazardous waste landfill, portions of which are already in post-closure. PDC has supplied no analysis of the impact these movements and weights have on the underlying ground stability, linter integrity etc. I believe this use of the closed portions of the landfill is a direct circumvention of the IPCB's earlier rulings against expansion of the PDC hazardous waste landfill.

4. PDC developed a list of constituents of concern based on convenience rather than concern for human health and safety—specifically it failed to ensure that its process effectively stabilizes hexavalent chromium.

   In its review of Section 104.406(h), Justification of the Proposed Adjusted Standard, IEPA agrees that treated K061 residue does not exhibit the characteristic of toxicity with respect to hexavalent chromium among other constituents of concern. I do not find that PDC's petition demonstrated anything at all with respect to hexavalent chromium. The only constituent of concern listed was chromium, which at various points is shown as total chromium. In other recent permitting activity, specifically the NPDES Permit No. IL0001589 for Citgo Petroleum, IEPA establishes separate discharge limits for total chromium and hexavalent chromium. While the permit allows for discharge with concentrations of up to 1.0 mg/liter of chromium per day, it specifically limits hexavalent chromium to just 0.3 mg/liter per day. I am unclear why this would not be the case for this delisting. The DRAS model includes both chromium and hexavalent chromium so it is unclear why hexavalent chromium, a known component of EAF dust, was not even considered as a constituent of concern.

   There is voluminous literature on the specific risks of hexavalent chromium. NIST, in cooperation with the New Jersey Department of Environmental Protection, and the USEPA, is developing standard reference material to provide traceability for measurements of hexavalent chromium in soil and contaminated waste. The paper explains "The environmental community, including those responsible for promulgating analytical methods, developing policy, enforcing regulations, and interpreting laboratory data, has long known that transition metal chemistry in nonaqueous media involves the actual species present, and not just the total elemental composition. The risk to humans is often dependent upon the form of the metal in the soil or sediment. Chromium (Cr) in the environment exists in two principal oxidation states – Cr-III (trivalent), a micronutrient, and Cr-VI (hexavalent), a known carcinogen. In the presence of inorganic and/or organic matrix components such as sulfide, iron, manganese, and organic carbon, the two species can interconvert from one form to the other. The use of some analytical methods is also known to alter the species distribution, thereby compromising test data designed to evaluate risk assessment." It goes on to state that "Hexavalent chromium litigation and waste-site remediation activities are now common."

   I believe it would be irresponsible of the IPCB to approve this delisting without hexavalent-specific risk analysis and a conclusive demonstration of the ability to control interconversions.

   I am also concerned about the omission of several other constituents of concern brought to light by the IPCB questions to PDC.

Issue 8a addresses the omission of dioxins and furans from the final list of constituents of concern and USEPA Todd Ramaly's comment that "we're not sure of this conclusion and did not yet agree that dioxins and furans are no longer an issue." When asked to describe the resolution with the USEPA, PDC points out that it analyzed each of the originally planned samples. Note that they did not do any dioxin/furan analysis for sample 9, not the original sample, the resample or the re-treatment sample—effectively ignoring the only sample which is at all representative of their process. PDC then goes on to assert that Mr. Ramaly's comment was "merely an informal comment and concurrence by all parties was neither an objective of the agenda nor an outcome of the conference call." To construe IEPA's approval as tacit USEPA approval is contradicted by Mr. Ramaly's statement. This issue is in no way resolved and the IPCB should dismiss the petition accordingly.

Regarding issue 9, the omission of all constituents of concern except for the 14 metals and Mr. Ramaly's request that the summary of the PDC, RMT, IEPA and USEPA conference call be amended to remove the statement "With comparison to TACO screening values and DRAS v.2 values, the results from the SAP implementation provided supports analytical results to exclude additional constituents of concern other than the 14 metals listed in the SAP/QAPP."

When asked to describe the resolution with the USEPA, PDC again claims not to have requested "USEPA-5 concurrence that certain constituents should be eliminated as constituents of concern." Again PDC concludes "Concurrence by all parties was neither an objective of the agenda nor an outcome of the conference call." As with the previous issue, this issue is in no way resolved and the IPCB should dismiss the petition accordingly.

5. PDC provided no rationale for its decisions to rely on DRAS results to establish some TCLP values and to cherry pick other statutes for other TCLP values.

   Page 4-6 of the RMT technical document waives away the fact that "benzo(b)flouranthesne and benzo(a)pyrene were above the DRAS-generated TCLP screening level" and instead compares the results to the Illinois Tiered Approach for Corrective Action (TACO) soil remediation standards. PDC provides no evidence as to why the TACO standards represent a better benchmark for monitoring semivolatile organic compounds.

   Page 4-7 dismisses the dioxin risk "slightly greater than the conservative 1 x 10-4 target risk" and suggests the observed dioxin TEQ concentrations (at twice the target risk) are consistent with nationwide background fish tissue concentrations. PDC provides no evidence as to why, after dismissing the DRAS model, it also finds the USEPA supplied spreadsheet unusable

   Page 4-8 similarly dismisses the potential for reactivity based on sulfide levels. Despite the fact that "total sulfide was reported at 700 mg/kg on a qualified sample," RMT uses what seem to be limitations in the testing methodologies – cumulative data on poor spike recoveries – to extrapolate that the amount of total sulfide is below a level that would exhibit reactivity. The details on this, and the PDC testing procedure to determine reagent reactivity, are not disclosed.

   The lack of a clear methodology for establishing TCLP values, coupled with the fact that the process itself is closed to public scrutiny, should be warning flags to the IPCB. There is clearly no way to assure that such a process adequately protects public health and safety.

6. PDC failed to demonstrate that DRAS is an appropriate model for predicting the behavior of stabilized wastes in the presence of MGPs, PCBs and industrial waste streams.

   Page 3-15 of the RMT document describes the Indian Creek landfill as accepting only "municipal solid waste and non-hazardous industrial waste" including ... MGP waste, PCBs, other delisted wastes, asbestos, foundry wastes, other industrial waste and remediation wastes. There is no evidence that DRAS accounts for anything beyond traditional municipal wastes. The underlying model is described by the USEPA as a "worst-case" scenario, but nothing in the DRAS software manual or associated model documentation suggests that it factors in industrial waste streams such as those accepted by Indian Creek. The only inputs required in the DRAS software related to the waste disposal site are the volume of waste to be deposited and the active life of the delisting petition. PDC and RMT have not provided any details to suggest that MGP wastes, PCBs or asbestos are factored into the DRAS calculations. Because of the special wastes, not typical of a municipal landfill, already present at Indian Creek, I am unconvinced that the levels of protection derived from a generic model are sufficient. PDC

included no assessment of these complex synergistic interactions or risks to the underlying Mahomet aquifer for Indian Creek or the other landfills targeted for disposal. Without a clear consensus that DRAS is an effective model for predicting stabilized waste behavior in the presence of MGPs and PCBs, the IPCB should take the conservative position and deny the delisting.

7. With no evidence justifying a deviation from earlier safeguards, PDC is proposing TCLP levels significantly less protective than previous delistings.

   In reviewing PDC's proposal, I found it curious that the Super Detox delisting contained TCLP levels considerably different than those PDC is requesting – significantly lower for 12 of the 14 constituents of concern. The Super Detox concentrations expressed as PPM, which for aqueous solutions, are equivalent to the milligrams per liter PDC uses in its petition. To me this inconsistency, coupled with the inconsistency between the delisting levels in PDC's F006 delisting where four of five levels are considerably more protective than what PDC proposes today, suggests the IPCB should deny this petition.

   Similarly, I am curious why PDC included the Nucor Steel delisting as support for its efforts when that delisting limits total mercury to 1 mg/kg. PDC, in response to IPCB issue 15b, the request to comment on the appropriateness of including a delisting level for total mercury, admits its total mercury concentrations to be 1.5 mg/kg. It outlines the relationship of total mercury to the provisional DRAS v.3 results and the TCLP limit, but does not examine why a six-year old delisting would have a much more stringent total mercury standard. If PDC cannot provide specific justification as to why it cannot meet the protective levels established in earlier petitions, IPCB should just deny the delisting altogether.

8. PDC failed to demonstrate even the most rudimentary control of the waste stabilization process. PDC's own analysis showed a first-pass failure rate of 63.5%.

   Page 4-2 of the RMT technical document outlines the problems encountered, "Some initial sample results showed exceedences of the anticipated delisting levels." Also, "the initial sampling program did not fully demonstrate PDC's procedure to verify that the anticipated delisting levels would be achieved through additional curing time and/or retreatment prior to disposal." Later in the document (page 5-3), RMT discloses that "a few of the samples collected during the first eight sampling events exhibited TCLP cadmium and zinc concentrations above their anticipated delisting levels." Still later (page 6-2), it is disclosed that, using an acidic extraction fluid, TCLP concentrations of cadmium greater than screening levels were found in four of the first eight samples and TCLP concentrations of zinc greater than screening levels were found in four samples as well. In all, five of the eight samples (62.5%) leached cadmium or zinc in an acid environment.

   An additional sample was taken in early February and exhibited TCLP concentrations above the screening level for both cadmium and mercury. The document notes that the sample was also analyzed for three additional parameters (silver, cyanide and sulfide) "since the data validation process indicated these tests had failed quality control standards during the initial phase of analyses" (page 4-4).To demonstrate that retreatment could fix the problem of leaching cadmium and mercury in an acid environment, over a sixteen-day period (including time for lab results to come back per page 4-4) the stabilized material was resampled and retreated before passing its test. RMT explains that the "IEPA agreed these additional data could replace previous data for cadmium and zinc exceeding the LDR treatment levels in the risk analysis." The only proof of concept offered in this document (page 6-2) to offset all the variability in the test results is the statement "The efficacy of additional curing time and re-treatment when necessary is demonstrated by PDC's experience and knowledge of the waste-reagent chemical reactions and verified by additional trials designed to demonstrate this additional treatment." With a 62.5% failure rate in the original eight samples, I would expect more than a single test of retreatment. I fail to see how this how this wildly out-of-control proof of process demonstrates anything even close to production-ready. I urge the IPCB to deny this petition on the basis of these test results alone.

   Page 5-2 of the RMT technical document provides additional insight into PDC's process control, "PDC contacted the consultant who developed the new treatment regimen, who assured PDC that no particular addition sequence or quantity of water was needed for the treatment to be effective." I am uncomfortable with such laxity in what has repeated been characterized as a tightly controlled process. There appear to be no standardized procedures and no records of what reagents are added to what

volume or water and in what order. This is especially troubling in light of the fact that the process specifics remain secret and the main proof offered for the efficacy of additional curing time and retreatment is "PDC's experience and knowledge of the waste-reagent chemical reactions."

Section 8, the conclusion of the RMT technical document, summarizes the earlier results, ignoring PDC's inability to treat the majority of samples to acceptable delisting levels on the first pass. Instead, based on a single sample's short-term (16 day) results, it proposes a "conditional" exclusion allowing additional treatment in the form of increased reaction time and, if required, re-treatment. They boldly state that the conditional exclusion creates a fail-safe system. Based on a single sample result, PDC's characterization of the overall effort as fail-safe is overreaching. PDC has failed to present data meeting even the minimum requirements of four samples specified by the USEPA. I urge the IPCB to dismiss this petition altogether.

9. PDC conducted no field testing whatsoever. Not a single ounce of stabilized waste was tested on-site at Indian Creek or any other municipal waste landfill.

   I am concerned that the entire modeling and laboratory analysis methodology are insufficient tools for determining long-term safety. PDC presented no evidence demonstrating that their analysis produced results reproducible under even the most abbreviated field testing situations. I believe the IPCB should deny the petition on this omission alone.

10. PDC conducted no real-time testing whatsoever. The tests were conducted beginning in December 2007 and ending in February 2008—nothing even remotely approximating permanent disposal.

    I am also troubled that there appears to be nothing more than laboratory analysis to ensure that the waste meets delisting limits. I don't expect PDC to study the process for 50 years, but I do think it is reasonable to expect that they would provide at least a full year's test results. I believe the IPCB should deny the petition on this omission alone.

In proposing this delisting, the burden is on PDC to demonstrate the long-term safety, both of the stabilization process itself and of the stabilized waste it produces. After a careful read of the petition and supporting documents, I believe PDC has done neither. I also find the IEPA remiss in approving a proposal with so many deficiencies in the testing methodology. Please keep EAF dust listed as a hazardous waste and in a hazardous waste landfill where it belongs.

Sincerely,

Tracy Meints Fox

Rick Fox
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Chillicothe, IL 61523

September 24, 2008

Office of the Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph Street, Suite 11-500
Chicago, IL 60601

PC 314

Partmailed 9/25/08

Re: Case # AS 08-10

Dear Board Members,

I am writing to ask that you deny Peoria Disposal's request to delist electric arc furnace dust. I have two major concerns with what is proposed. First, there is no economic justification for taking this action. Second, Peoria Disposal asks for far too much authority to operate without oversight from the IEPA or any other agency.

Economic Justification

Illinois code 104.406 requires that PDC's petition include "A description of the efforts that would be necessary if the petitioner was to comply with the regulation of general applicability. All compliance alternatives, with the corresponding costs for each alternative, must be discussed. The discussion of costs must include the overall capital costs as well as the annualized capital and operating costs."

PDC, based on current waste disposal volumes, will run out of landfill capacity some time in 2009. Basically, PDC wants to repurpose its waste stabilization facility, built 19 years ago, to process delisted waste because it has been unable to gain Peoria County Board siting approval to expand its hazardous waste facility. In an attempt to provide a discussion of costs of compliance alternatives, it compares the costs of transporting and disposing of stabilized EAF dust in the Roachdale Indiana hazardous waste landfill to the costs of transporting and disposing the dust in the Hopewell Illinois municipal landfill.

This comparison greatly oversimplifies the situation. In the motion to expedite the IPCB ruling, PDC claims the Roachdale landfill is 220 miles away. Mapquest shows it to be 187 miles. PDC assumes the municipal landfill target is Hopedale, 29 miles away, rather than Clinton which is 67 miles away or Baylis which is 117 miles away. PDC compares the cost of disposal in a competitor's hazardous waste landfill (Roachdale) to disposal in a landfill that is part of its operations, raising the question of whether the $20 per ton for disposal at Indian Creek is really on a comparative basis with the $98 per ton claimed for Roachdale. Also, the PDC figures assume the waste is only stabilized once. Based on the test results, it is clear the majority of waste will have be stabilized at least two or more times.

Additionally, the lost annual revenues of $12.5 million are just that ... revenues. There is no indication what portion of these gross receipts would be needed to cover the costs of stabilization reagents and treatment materials, licensing fees for the treatment technology, operation of the stabilization facility, testing and reporting, the multiple treatments that seem to be required to meet delisting levels, and other administrative costs. Certainly it is not reasonable to believe that the entire treatment process, would add zero cost to the process.

Furthermore, there is no reason to believe that the transportation and disposal costs in and of themselves put PDC at a competitive disadvantage in operating its waste stabilization plant for its entire customer base. Routings from Sterling, Illinois, Muscatine, Iowa and Wilton, Iowa with a stop at PDC for stabilization would add less than five miles to the overall distance traveled as dust from all three locations would travel to Indiana along I-74. In these instances, and perhaps others, there is no reason why PDC could not effectively compete with Roachdale as a stabilization alternative.

PDC claims no capital costs and fails to provide operational costs. Instead it attempts to pass off lost revenues as operating costs and boldly asserts the loss, 17% of its overall annual revenues based on its

Waste Age ranking, would be "an unbearable hardship for PDC." It further asserts the costs would be an "unbearable cost burden for its K061-generating customers in the Midwest, many of which have no feasible or economically viable alternative. No data whatsoever was presented on geographic locations of these customers, distances to other landfills, reasons these mills could not sell their EAF dust to Horsehead Industries in Calumet for recycling, or reasons these mills could not pursue implementation of an on-site SuperDetox treatment program to treat their own wastes. The IPCB should not accept this weak analysis. It is PDC's responsibility to provide economic justification and it has not done so.

In the RMT technical document, PDC claims "The reduced transportation and associated costs will allow PDC to continue to offer its cost-effective services to its steel manufacturing customers. These steel manufacturers are vital to the economy and strategic in the security of Illinois and the United States. The domestic steel industry is subject to intense international competition from companies that do not necessarily have the same cost burdens resulting from the strict environmental and labor regulations present in the Untied States. Competition from these foreign producers makes it imperative that U.S. steel companies constantly improve productivity and efficiency while reducing costs in all aspects of their operations, including waste management. Granting the requested delisting Adjusted Standard exclusion will help in this effort."

This is an outdated assertion. *Illinois Business Journal* in August 2008 characterizes the steel industry as "booming." Mike Fitch CEO of Alton Steel explains that demand is outstripping supply, foreign imports have dwindled to a trickle and dumping is a thing of the past. He further points to rapidly growing demand in China, India, Brazil and Eastern Europe, the steel demands of all facets of the highly profitable oil industry and the weak U.S. dollar. "The value of the dollar has deteriorated on the global market relative to other currencies to the point that products manufactured in the United States are a real deal," said Fitch. "The steel industry has not enjoyed this type of economy since 1946." On June 1, 2008 the San Diego Union-Tribune reported "Buoyed by sharply reduced employee costs, soaring global demand, dramatic consolidation that has tamped down cutthroat competition and a weakened dollar that has made imports less attractive, steel prices have tripled in the past five years." If there ever was a time for the steel industry to step up and make an investment in greener manufacturing practices, that time is now. By granting this delisting, I believe the IPCB would actually be jeopardizing the long-term viability of the U.S. steel sector.

Lack of Oversight

In its proposal PDC asks for the ability to extend the scope of the delisting whenever it pleases following bench-scale tests. It argues "It is important to PDC's viability as an ongoing business enterprise to have flexibility to add additional generators as market conditions change and future opportunities arise without re-petitioning the board."

This is absurd. PDC failed to demonstrate that the delisting itself is critical to its financial survival, let alone its ongoing viability. No information whatsoever on future market conditions or customer requirements was provided. The IPCB should deny this request.

PDC also asks for the ability to extend the scope of the delisting whenever it decides to change the underlying chemistry of its treatment process. "It is PDC's experience that the availability of specific chemicals from specific sources is subject to change over time. Further, even like chemicals from different sources can vary markedly in their specific chemical make-up. As technologies evolve and improve, and the availability of chemicals and sources inevitably change, re-petitioning the Board would not be required under the proposed adjusted standard language, provided PDC follows the qualifying procedure set forth therein."

This too is absurd. PDC contends its process is proprietary and cannot be disclosed. It asks us to trust that its test results will guarantee our health and safety even though the very MSDS sheets on the reagent chemicals cannot be revealed. Now it is asking for free license to vary its secret process with no justification whatsoever, just the bland assertion that things change over time. The IPCB should deny this request.

In the IPCB's questions to PDC, IPCB proposes several notifications including one that PDC notify the IEPA when it transports an initial load of treated waste to a particular disposal facility:

PDC agrees to give 15 days calendar notice, but specifically indicates such reporting is "not for review and pre-approval." I find this greatly overstepping as the permit barely mentions either the Clinton or Pike

County landfills and no details on controls in place at either facility are part of the record. I urge the IPCB to accept only considerably more stringent language here.

IPCB also proposes that PDC notify the IEPA when it significantly changes its process and include the bench-scale treatability test results. Again PDC specifically indicates such reporting is "not for review and pre-approval of the demonstration." It further believes it would be acceptable to conduct no tests at all—to simply rely on MSDS, product spec sheets, supplier process knowledge and lab results provided by the supplier as the sole means of identifying potential constituents of concern. It goes on to reserve the right to redact confidential information from its 15-day notice to the IEPA.

PDC's attempt to equate requirements for evaluating the safety of off-spec, unused or discarded chemicals with the chemicals it mixes in unknown quantity and sequence, subject to change as PDC sees fit, should be dismissed. Using an MSDS to make a determination about a chemical isolated in its own container, not handled by workers or having ongoing potential to impact waste stabilization facility emissions is not an equivalent situation at all.

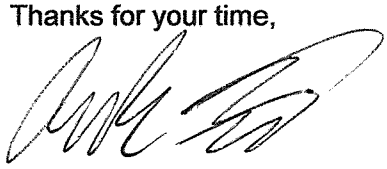
PDC's belief that this constitutes a fail-safe process is truly frightening. I urge the IPCB to accept only considerably more stringent language here or, more reasonably, deny the petition altogether.

Finally, I am dismayed to realize that PDC's petition does not include any reopener language. I hope this is boilerplate text included in all IPCB delistings. With all the confusion over which constituents of concern to monitor, dioxins and furans and mercury TCLPs versus total mercury, I feel it is absolutely necessary.

Conclusion

There are numerous reasons for denying PDC's delisting request. I urge the IPCB in making its decision to weigh carefully the weak nature of PDC's economic against the risks to public health and safety. PDC's unwillingness to accept even minimal oversight on how it can apply the delisting once granted speaks volumes about that risk. I urge the IPCB to avoid the risk altogether and deny the delisting petition.

Thanks for your time,



Rick Fox