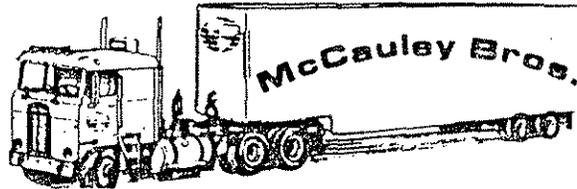


Local &
Long Distance
Moving & Storage



816/283-3939
Office & Residential
Movers

I.C.C.-MC 159915

February 20, 1991

Mr. Phil Lammers
City Manager
City of Cameron Missouri
205 North Main
Cameron, MO 64474

Site:	Rockwool Indus
ID #	
Break:	1.6
Other:	2-20-91

Mr. Lammers;

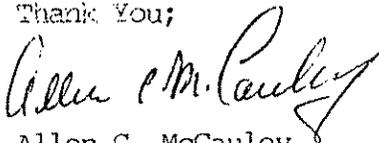
Following a close study of the report issued by the Environmental Evaluations Corp. to the city of Cameron, regarding the Rockwool Industries abandoned manufacturing plant, and appox. 20 acres of land.

Allen C. McCauley and Barbara C. McCauley have decided to postpone the purchase of said property, until Items 1 through 4 Column IV of the conclusions and recommendations, have been corrected by the city of Cameron.

Also, agreements must be reached for a cleanup process of the area, and a deadline for completion of construction now is progress.

Some kind of security needs to be put in place to prevent further damage to other areas of the building not under construction. Such as electrical fixtures, lights, wiring, conduit, overhead door controls, and general structure, until sale of property has been finalized.

Thank You;


Allen C. McCauley

40273970



Superfund

ENVIRONMENTAL EVALUATION
of
ROCKWOOL INDUSTRIES ABANDONED MANUFACTURING PLANT
IN CLINTON COUNTY, MISSOURI

For
The City of Cameron, Missouri

by
ENVIRONMENTAL EVALUATIONS, INC.

March 7, 1990

I. INTRODUCTION AND SUMMARY OF INFORMATION

This report is an environmental evaluation, or environmental site assessment, of an abandoned Rockwool Industries facility near Cameron, Missouri by Environmental Evaluations, Inc. This was basically a Phase I level environmental audit although two soil samples were collected and analyzed.

This evaluation was based on information obtained from the following sources:

1. Visual inspection of the property, February 2, 1990
2. Personal interview with David Mallen, Cameron Director of Public Works, February 2, 1990
3. Personal interview with Mr. Bob Earl, former employee of Rockwool Industries, February 2, 1990
4. Personal interview with Mr. Howard Briggs, Cameron Manager of Industrial Development, February 2, 1990
5. Personal and telephone interviews with Mr. Barry Hart, Manager of Industrial Development for Platte-Clay Electric Power Cooperative, February 2 and 7, 1990
6. Telephone conversation with Richard Bennett, Cameron Assistant Fire Chief, February 2, 1990
7. Telephone conversation with Lloyd Bacon, former owner of the property, February 2, 1990
8. Telephone conversation with Mr. Robert Rasmussen, Susquehanna Corporation, February 9, 1990
9. Telephone conversation with Mr. Al Geek, engineer consultant to Rockwool Industries & Susquehanna Corporation, February 10, 1990
10. Review of abstract records at Cameron Title Company in Cameron, Missouri, February 2, 1990
11. Telephone conversation with Mr. Mike Poland, former Cameron City Attorney, February 2, 1990
12. Written communication with Mrs. Kerry Henderson, U.S. Environmental Protection Agency, February 7, 1990
13. Written communication with Mr. Kevin Kelly, Missouri Department of Natural Resources, February 7, 1990

14. Telephone communication with Mr. Jim VanDyke, Missouri Department of Natural Resources, Division of Geology and Land Survey, February 8, 1990
15. The results of analysis of soil near the transformer and waste slag disposed on site.

This evaluation does not address any environmental condition present at the site which was not made known to Environmental Evaluations, Inc. during personal, telephone or written communication, as described above, was not readily apparent during visual observation of the site or was not detected by analysis of samples collected at the site.

II. PROPERTY DESCRIPTION, HISTORY AND STATUS

The property evaluated is located in the SW $\frac{1}{4}$ of Sec 21, T57, R30, Clinton County, Missouri. The complete legal description is provided on the attached site plan and survey (Attachment 1). It is an oddly shaped parcel of 38 acres MOL in two tracts and a building of about 92,000 square feet. The facility was built and operated as a rockwool insulation manufacturing plant from 1974 until it closed in 1981. A major warehouse addition was completed in 1979. Currently the building is unused, although much of the equipment and supplies remain, having been abandoned by Rockwool Industries.

The manufacture of rockwool insulation was accomplished by melting a rock like slag by-product from steel mills and "spinning" it into a fibrous insulation. The raw material, having a high silica and iron content, was a blend of up to six or seven different types of steel mill slag; natural gas was used to melt the slag. A quantity of raw material remains on site and is located in the aggregate storage area at the North end of the property.

Most of the product was bagged, although some bats were manufactured just prior to closing the plant. Manufacture of bat insulation required the use of binding adhesives and asphalt.

Not all of the raw material was converted to insulation, resulting in a waste product called clinkers or waste slag. This material was primarily disposed on the northeast corner of the property and, according to Mr. Bob Earl, a large quantity was moved to Grindstone Quarry west of Cameron for final disposal. Photograph #1 shows part of the waste remaining on site.

Prior to construction of the building, tract 2 was owned by the Burlington-Northern Railroad and tract 1 was owned and farmed by Mr. Lloyd Bacon. All rail lines in the area have been abandoned. The entire area surrounding the site is agricultural, used for

both row crops and pasture. Mr. Bacon has farmed in this area for many years and continues to farm the property just east of the site.

We asked Mr. Bacon if he knew of any train derailments that resulted in chemical spills or of other potential contamination. Mr. Bacon indicated he knew of no derailments or other contamination of the site or surrounding area. Mr. Richard Bennett, the Assistant Fire Chief and Mr. Bob Earl also stated they knew of no derailments causing spills in the area. They also indicated they knew of no spill or fires at the Rockwool Industries facility that required emergency response.

According to Mr. Earl, the property that was not utilized in the manufacturing, shipping and waste disposal operations, primarily the southern section of Tract 1, was not used in any way by the company. A brief inspection of unused areas showed them to be completely vegetated with no indication of spills or site contamination. However, the area was covered with ice and light snow at the time of the inspection.

There are no known abandoned or uncontrolled hazardous waste sites listed in the general area of this property. Copies of letters in this regard from both the DNR and EPA are provided as Attachments 2 and 3.

Stormwater runoff discharges from the site at both the north and south boundaries. Runoff from the southern portion of the property does not come in contact with any of the manufacturing or waste disposal areas of the site. This runoff is discharged toward the southern edge of the property at the public road then flows east. Stormwater which comes into contact with the manufacturing and waste disposal areas discharges from the site at the northeast corner of the property.

The City of Cameron supplied water and sewer services to the facility. It was indicated that only domestic sewage was discharged from the plant to the Cameron sewer.

According to the Missouri Division of Geology and Land Survey, groundwater in the area around Cameron is generally of marginal to poor quality, high in sulfur and minerals. There are some locally producing formations in pre-glacial valleys and areas of glacial drift, but these are not common and recharge rates are generally poor. It is our understanding that there are relatively few domestic wells used for potable water in the area. Considering the nature of the groundwater and the rockwool manufacturing operation, adverse impact on groundwater would not be expected.

A final consideration is the legal status of the building and property. The facility is owned by the City of Cameron and leased

under an IDB lease to Rockwool Industries (Susquehanna Corporation). The lease ends in 1993 and control of the property will revert to the city unless Rockwool Industries exercises its option to purchase the property. Considering the ownership/lease arrangement, it is possible that the city would be liable for any cleanup or remediation costs that might be incurred as a result of mandated state or federal actions.

III. PROPERTY ENVIRONMENTAL EVALUATION

A. Underground Storage Tanks, Below Grade Piping

According to sources interviewed who have knowledge of the site, no one was aware of the existence of any underground storage tanks. However, one underground storage tank was located during the visual inspection of the site on February 2, 1990. This tank is located on the west side of the building adjacent to the gasoline pump. See photo #2.

Several "stand pipes" were located on the property, one on the east side of the building to the immediate south of the propane tank foundation supports, one on the west side of the building north of the underground storage tank and adjacent to a concrete slab, and two in the center of the original production building. These "stand pipes" did not appear to be a part of any underground storage tank system, however, this could not be confirmed.

Federal underground storage tank regulations require owners/operators to notify the state of the location of their underground storage tanks, while the state of Missouri requires a registration fee of \$100 per tank to be paid.

Assuming the tank was installed between the years of 1970 to 1974, at the earliest, the tank is required to be upgraded with a release detection system by December 22, 1991. Cathodic protection and spill and overflow prevention equipment is required by December 22, 1998.

In the event the tank is not upgraded, the tank is required to be closed in accordance with applicable state and federal requirements.

B. Asbestos

The building was thoroughly inspected for the presence of asbestos type insulation. Based on the visual inspection there appears to be no installed asbestos insulation on pipes or tanks on the property. This should be confirmed if insulation is disturbed.

Several small asbestos valve packing/gasket materials were found in the parts storage area, Garloc brand. These unused packing materials were, however, not in a "friable" state. Asbestos containing materials most likely exist in installed valve packings and gaskets. If these areas are disturbed by dismantling, the packing/gasket material would be considered "friable".

In the event any valve packing/gasket material is disturbed, the material should be handled by qualified personnel and as a small scale short-duration renovation or maintenance task.

If the packing/gasket materials were not disturbed during renovation where workers would not be exposed to asbestos, such personnel qualified for asbestos abatement would not be necessary. Personnel should, however, be instructed that asbestos does exist and be informed of the potential locations it could be found.

C. PCB's

Electrical equipment containing dielectric fluid present on the property consists of transformers located in a substation to the east of the building and a building transformer located immediately adjacent to the east side of the building (see Attachment 1). The substation and building transformer are owned and maintained by Platte-Clay Electric Cooperative and NW Electric Power Cooperative.

The substation transformers are labeled non-PCB while the building transformer is labeled PCB contaminated. Platte-Clay Electric Coop. indicates the PCB concentration of the building transformer is 55 ppm but that it has been retrofilled to reclassify the transformer to a non-PCB item. Reclassification has not been completed.

According to Platte-Clay Electric Coop. there have been no spills or releases of dielectric fluid from the building or substation electrical equipment. Results of analysis on a soil sample taken in the immediate vicinity of the building transformer near the drain valve supports that no spills have occurred from the building transformer. This analysis is presented as part of Attachment 4.

D. Solid Waste

Solid waste that was generated from the production of the rockwool insulation was primarily waste slag. As indicated in the site description section, the majority of this material was removed from the site and disposed off-site in a quarry west of town, Grindstone Quarry. A large amount of waste slag remains on the site located at the northeast corner of the

property and covering an area of approximately two acres (see Photograph #1). Quantities of waste slag were also found at the north and northwest areas of the site.

According to Mr. Bob Earl, the waste slag material was evaluated in late 1978 by the Missouri Department of Natural Resources prior to disposal of the slag off-site at the quarry. Apparently, the state found no problem with the material restricting disposal of the slag in the quarry.

Mr. Robert Rasmussen indicated that samples of the slag had been evaluated against hazardous waste criteria within the last year or so and were determined to be non-hazardous. Results of analysis for a sample collected from the site on February 2, 1990 confirmed this (see Attachment 4). Analysis of the sample was for EP Toxicity-metals only.

In addition to the waste slag, a quantity of municipal or sanitary landfill type waste is present on the site in the same areas as the waste slag.

Both the waste slag and municipal type wastes are solid wastes subject to the Missouri Solid Waste Management Law and Regulations. Solid wastes are required to be stored or disposed in "permitted" solid waste storage/disposal facilities. Waste material at the Rockwool site would need to be removed to a permitted off-site solid waste facility or approval provided by the state to close the solid waste storage facility in its approximate present location.

E. Wastewater and Site Runoff

Wastewater that was generated at the facility consisted only of domestic sewage according to information obtained from interviews. Initially, it was indicated, an on-site septic system was used to treat and dispose of domestic sewage while later the city of Cameron provided municipal sewer service.

No process wastewater was indicated during interviews or observed to have been generated. It is possible that wastewater may have been generated from the water treatment equipment, primarily water softening, in the boiler room. According to persons interviewed about site operations, it is unclear whether this equipment was ever used.

Site runoff from the property discharges from the northeast and southeast areas. Runoff generated from the south portion of the property does not come into contact with any of the industrial or production areas of the site or building. Site runoff discharged from the northeast portion of the site comes into contact with the building, aggregate storage area and the waste slag storage area.

A wastewater discharge permit is required for the site as runoff is discharged from the facility which does contact industrial raw material and waste storage areas. This permit system is under the authority of the state of Missouri and is referred to as the National Pollution Discharge Elimination System or NPDES.

F. Nonused Stock Materials, Material in Tanks, Hazardous Waste

A quantity of nonused stock material in containers and tanks along with several used items are present at the Rockwool Industry site. Photograph #3 shows an example of the type of items found. An inventory of materials present was taken on February 2, 1990 and is provided as Attachment 5. This inventory represents only an approximate general description and quantity of material remaining at the site. Item descriptions are only general as no samples were taken for analysis and as tanks and containers were not labeled descriptively. A number of empty drums and drums which could not be determined to have contents (primarily drums located in a pit under machinery in the older portion of the building) are present at the site.

The used or discarded items included several paint cans and lead acid batteries at the waste slag storage area and four 55 gallon drums located outside the northeast end of the building. The four drums could not be opened or determined to have contents as they were frozen in the ground.

According to state and federal hazardous waste regulations the lead acid batteries are a hazardous waste while the paint wastes could potentially be hazardous if they fail one of the hazardous waste criteria. Due to the presence of such items, and other municipal type solid waste in the slag waste storage area, it is very likely that small quantities of hazardous wastes have been disposed in the waste slag storage area over the operating life of the facility.

Nonused stock materials present in containers and tanks could, by definition, be considered a solid waste according to state and federal regulations as they have been basically abandoned. Being a solid waste and due to their chemical nature, a large portion would be hazardous wastes. All petroleum products including asphalt, solvents, wax emulsion and grease would be hazardous waste in Missouri as waste oil. Several items would be corrosive hazardous wastes, e.g. aqua ammonia and hydrochloric acid. The pentachlorophenol is a listed hazardous waste, while items such as the marking ink, solvents and paint would likely fail the ignitability hazardous waste criteria.

Items present at the site, as discussed above, are solid wastes or hazardous wastes subject to state and federal regulation. A large number of the items being hazardous wastes have been improperly disposed, e.g. lead acid batteries, or are being improperly stored. It should be noted that if the unused items could be removed from the site and returned to the supplier or used as a resource, hazardous waste regulations would not apply.

IV. CONCLUSIONS AND RECOMMENDATIONS

In general, we found no significant problems which would likely present long term liability for the City of Cameron. However, there are environmental concerns that should be resolved prior to the city regaining full control of the property and building. These concerns are summarized as follows:

1. All unused materials and solid and liquid wastes should be removed from the facility for recycling or proper disposal. This would include all material in drums, carboys, cans, tanks, bags, bottles or other containers that could be classified as either solid or hazardous waste.
2. The waste slag, spent batteries, and small quantities of domestic type wastes in the landfill area must be permitted for disposal, removed to a permitted facility, or otherwise dealt within a manner acceptable to Missouri's Solid Waste Management Program. (Note that spent batteries are considered a hazardous waste and must be recycled or disposed accordingly).
3. The underground storage tank does not meet current state requirements. It is recommended that the tank be removed.
4. State and federal regulations do require NPDES permits for stormwater runoff from industrial facilities. The DNR should be contacted to determine if such a permit is required. Future plans for the building and disposition of waste slag should be considered in this regard.
5. Asbestos appears to be a relatively minor concern at this facility. However, it is likely there is asbestos valve packing and gasket material in the facility. Any material such as this should be considered friable and handled accordingly if disturbed. Although pipe and other insulation appeared to be non-asbestos, this should be confirmed prior to disturbance.

6. As discussed in Section II, it is possible that the city, as owner of the facility, could be liable for any remediation or cleanup costs that might be incurred as a result of mandated state or federal action. It is recommended that the city consider having a qualified environmental attorney evaluate their liability in this regard. Also, if permitted under the lease, the city should require Rockwool Industries (Susquehanna Corporation) to eliminate any environmental liabilities identified in this report or otherwise.

ENVIRONMENTAL EVALUATIONS, INC.

3330 Suzanne Circle
Springfield, MO 65810
(417) 885-3802

Principals:
Jerry E. Bindel
Charles S. Means, P.E.

March 7, 1990

Mr. Howard Briggs
Manager of Industrial Development
City of Cameron Missouri
205 North Main
Cameron, MO 64429

Dear Mr. Briggs,

Enclosed is our report on the environmental evaluation of Rockwool Industries' abandoned manufacturing plant near Cameron. I apologize for the delay in submitting this report. It has been essentially complete for some time, however, the sample analysis took about 10 days longer than expected.

Considering the nature of this facility, we found it to be in relatively good environmental condition. However, as summarized in the report's final section, there are certain liabilities that should be addressed prior to the city taking full control of the property and buildings.

Thank you very much for the opportunity to work for the City of Cameron. If we can be of further assistance in this regard or with other environmental issues, or if you have any questions regarding our report or enclosed invoice, please do not hesitate to call.

Sincerely,


Charles S. Means, P.E.

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

FEB 23 1990

Charles S. Means, P.E.
Environmental Evaluations, Inc.
3330 Suzanne Circle
Springfield, Missouri 65810

Dear Mr. Means:

Re: Freedom of Information Act Request
Number (7)RIN 90-333

This is in response to your Freedom of Information Act request for a CERCLIS listing for Clinton County, Missouri.

Please be advised that review of our CERCLIS database reveals no Superfund sites in Clinton County, Missouri.

The fees incurred in processing your request were less than \$25.00; therefore, there is no charge.

Sincerely yours,

A handwritten signature in cursive script that reads "David A. Wagoner".

David A. Wagoner, Director
Waste Management Division

Enclosure



JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176
Jefferson City, MO 65102

February 20, 1990

Mr. Charles S. Means, P.E.
Environmental Evaluations, Inc.
3330 Suzanne Circle
Springfield, MO 65810

Dear Mr. Means:

RE: Two adjoining tracts in SW 1/4, Sec. 21, T 57, R 30
Clinton County, Missouri

Thank you for your inquiry requesting information regarding the locations of hazardous waste sites in Missouri. All of the known potential and confirmed contaminated sites are listed on two tracking records and maintained by the Missouri Department of Natural Resources (MDNR) and the U.S. Environmental Protection Agency (USEPA).

The MDNR tracking record, the Registry Log, lists all the sites which have been proposed or confirmed for the Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites in Missouri. The USEPA tracking record, CERCLIS, lists all of the sites which are suspected of having had a release of a hazardous substance on the property. Neither of these tracking records list any contaminated sites in the county(s) subject to your inquiry.

It should be noted that a tract of land cannot be certified as free of a hazardous substance without extensive sampling and testing. MDNR does not routinely sample property upon request. The department may take enforcement action, to include sample collection, where there is strong evidence that a hazardous waste or substance is present on the property. The Consulting Engineers Council of Missouri may be able to assist you in locating a firm capable of sampling a tract and determining the presence or absence of a hazardous substance. They can be contacted at 205 East Dunklin, Jefferson City, Missouri 65101, (314) 634-4080.

Mr. Charles S. Means
February 20, 1990
Page Two

I hope you find this information useful. Please contact the Waste Management Program at (314) 751-3176 if you require further information.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY



Kevin A. Kelly
Environmental Specialist
Waste Management Program

KAK:pkm

01
of

ACZ Laboratories, INC.

ORGANICS ANALYSIS DATA SHEET

Client: Environmental Evaluations Lab Sample ID: 0026-008
 Sample ID: Cam. 2 Lab File ID: GC301090
 Matrix: Soil Date Received: 02-06-90
 Sample Date: 02-02-90 Date Extracted: 02-14-90
 Report Date: 03/02/90 Date Analyzed: 02-15-90
 DF: 1.65

Method ID: PCB's BY EPA 8080 GC/ECD

CONC. UNITS: ug/Kg

CAS NO.	COMPOUND	CONCENTRATION
12674-11-2	Arochlor-1016	132
11104-28-2	Arochlor-1221	132
11141-16-5	Arochlor-1232	132
53469-21-9	Arochlor-1242	132
12672-29-6	Arochlor-1248	132
11097-69-1	Arochlor-1254	264
11096-82-5	Arochlor-1260	50

FORMAT: "U" Indicates compound not detected.
 "J" Indicates compound detected < method detection limit.
 "B" Indicates that compound was also found in the daily blank

COMMENTS:

APPROVED: Russell V. Karch Kelt

Client : Environmental Evaluations, Inc.
Address : 3330 Suzanne Circle
Springfield, MO 65810
Attn. : Mr. Jerry Bindel
Project :

Sample Matrix: Soil
Sample ID: Cam. 1
Sample Date Time: 02/02/90
Lab No. : 90-S1/00090
Date Received: 02/06/90

Parameters

Arsenic (EP)	.006	mg/l of Ex
Barium (EP)	.34	mg/l of Ex
Cadmium (EP)	.049	mg/l of Ex
Chromium (EP)	-.01	mg/l of Ex
Lead (EP)	.13	mg/l of Ex
Mercury (EP)	-.0002	mg/l of Ex
Selenium (EP)	.001	mg/l of Ex
Silver (EP)	.08	mg/l of Ex

Analysis performed following EPA SW-846, 3rd Ed Protocols.

Remarks:

Note: Negative sign "-" denotes that the value is less than "<"

Frank E. Polniak, Inorganic Lab Supervisor

ATTACHMENT 5

INVENTORY OF MATERIALS IN CONTAINERS

<u>ITEM</u>	<u>LOCATION</u>
1. One, one quarter full 55 gallon drum of oil	outside, west side of bldg. north of asphalt unloading area
2. Twelve full drums, two half full drums Mulrex 90 wax emulsion	northwest corner of bldg. near boiler room and storage area near center of bldg. along west side
3. Quart containers of household ammonia	northwest corner of bldg. near boiler room
4. Five gallon can with solvent or paint	(same area as 3.)
5. Five gallon can of oil	(same area as 3.)
6. One full and one partially full 55 gallon drum of caustic soda	boiler room
7. Stack of bagged water softener chemicals	boiler room
8. One 55 gallon drum $\frac{1}{2}$ full of oil	maintenance room
Six gallon can grease	(same area as 8.)
10. Misc. small cans of paint	(same area as 8.)
11. One quart can pentachlorophenol	(same area as 8.)
12. One 55 gallon drum and one 40 gallon drum one quarter full of oil	northeast side of bldg.
13. Two 55 gallon drums blue marking ink	storage area near center of bldg. along west side
14. One 55 gallon drum of solvent	south end of old bldg.
15. Approx. fifteen 25 gallon carboys hydrochloric acid	northeast corner of new bldg.
16. Five gallons degreasing compound	new bldg.
17. Three 55 gallon drums of oil, one full, two half full	new bldg.
18. Four 55 gallon drums aqua ammonia	new bldg.

TANKS WITH MATERIAL (VOLUME UNKNOWN)

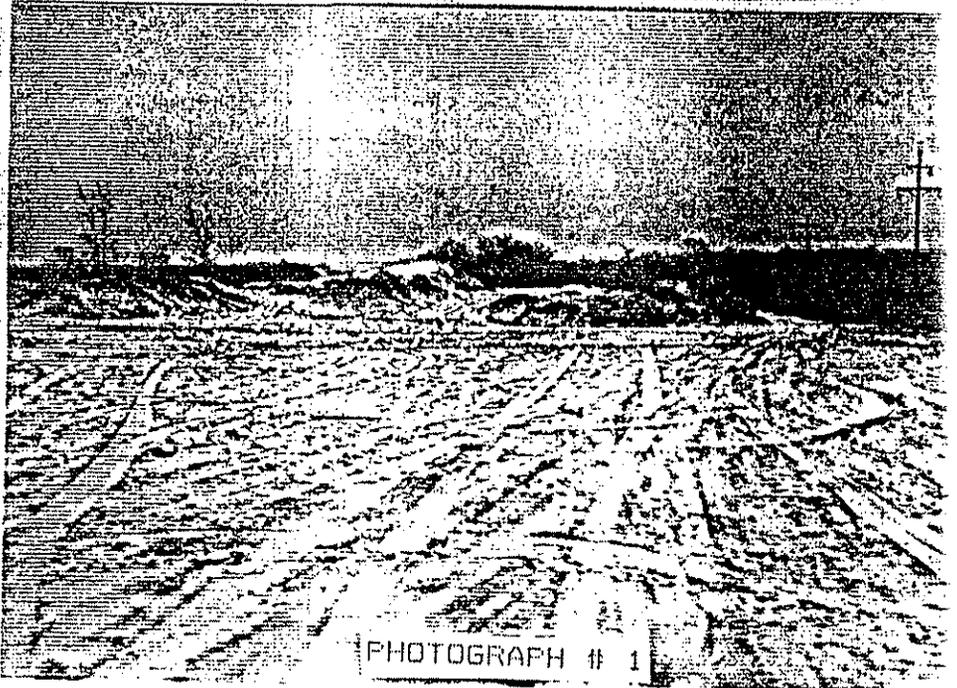
1. Four large tanks, approx. 30 feet by 8 feet with unknown material; possibly ethylene glycol or a binder resin "Reax"
2. One asphalt tank

USED OR DISCARDED ITEMS

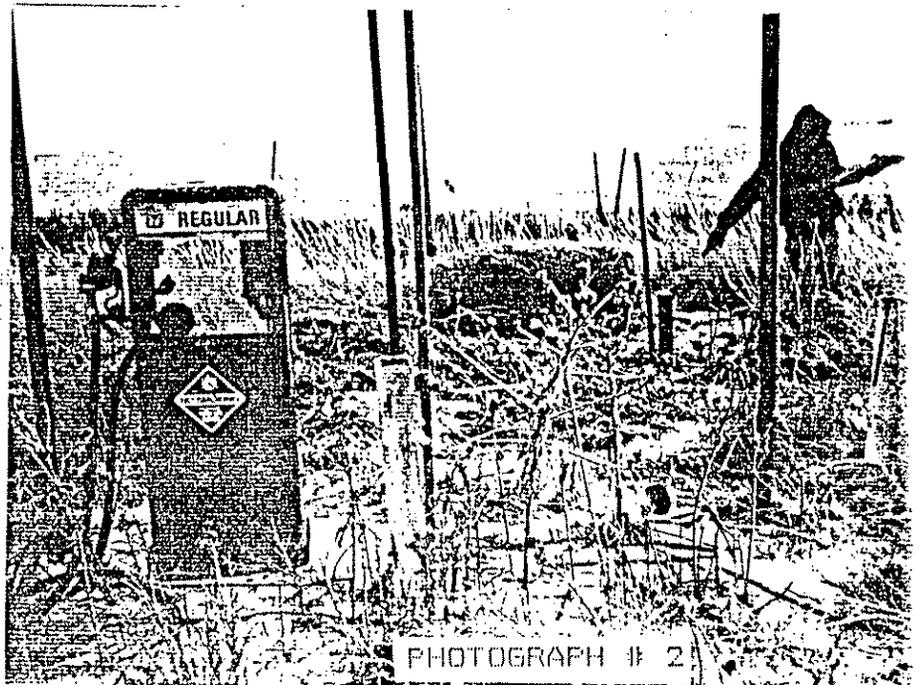
ITEM

LOCATION

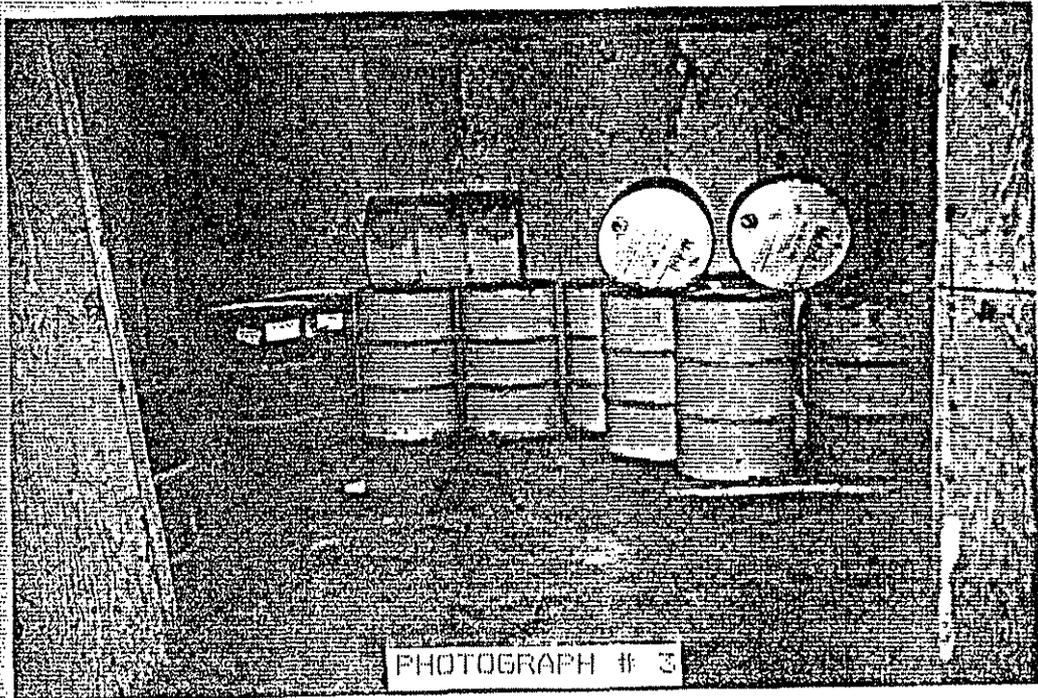
- | | |
|----------------------------|-----------------------------|
| 1. Old paint cans | at waste slag storage area |
| 2. Old lead acid batteries | at waste slag storage area |
| 3. Four 55 gallon drums | outside, northeast of bldg. |



PHOTOGRAPH # 1



PHOTOGRAPH # 2



PHOTOGRAPH # 3