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DELISTING, INTERIM STATUS, AND SAMPLING ISSUES AT U.S. NAMEPLATE COMPANY

FEB 25 1987

Harvey E. Henjum
President
IFS Investors Services, Inc.
7800 Metro Parkway
Suite 100
Minneapolis, Minnesota 55420

Dear Mr. Henjum,

This letter is in response to your October 20, 1986 letter to Ms. Marcia Williams, in which you requested information about discharges generated by the U.S. Nameplate Company (Nameplate) and the possibility of ground water contamination at its facility in Mt. Vernon, Iowa. I am sorry that our response has been so long in coming, but the Agency has only recently been able to address the issues of concern to you.

We are aware of two types of waste management units at the Nameplate site: a drainage field and a waste lagoon. Prior to 1979, Nameplate's liquid wastes were treated in septic tanks and discharged to an on-site drainage field which flowed into a nearby creek. These acidic wastes were generated from Nameplate's metal etching operations, and wastes such as these typically contain high concentrations of several metals.

As a result of the discharge from the drainage field, Nameplate was proposed in October 1984 to be included in the National Priorities List (NPL) for future clean-up under the provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, or "Superfund"), based on the potential for copper, zinc, and fluoride to reach ground water. This site remains in proposed status until the Agency implements its final policy for listing sites on the NPL that are still regulated under the authority of the Resource Conservation and Recovery Act (RCRA).

After a number of citizen complaints to the State of Iowa about the drainage field, Nameplate constructed a waste lagoon

to treat the wastes. The State subsequently determined that the lagoon was treating hazardous wastes and requested Nameplate to file a Part A permit applications for the lagoon as a hazardous

waste management unit. The Part A permit application was submitted in February 1981, but the lagoon did not receive interim status from the State, and has, therefore, been operating as a non-permitted hazardous waste treatment unit. In 1982, after a State inspection noted several deficiencies, the State of Iowa determined that the lagoon was leaking, based on high fluoride levels in ground water at the Nameplate site.

Nameplate petitioned the Agency in December 1984 for an exclusion ("delisting") to exempt its lagoon from compliance with the federal hazardous waste program. Samples of lagoon sludges taken by EPA Region VII personnel in July 1985 indicated the presence of trichloroethylene (TCE) in Nameplate's sludge at concentrations of up to 95 parts per million (ppm). TCE was also detected, as well as barium, lead, chromium and nickel, at elevated levels in the ground water, although the data was insufficient to make any statistically valid determination about the ground water contamination at Nameplate's facility. Nameplate did not indicate in its petition that TCE was used in its process. In addition, the Agency has knowledge that highly corrosive wastes ($\text{pH} < 2$) were allowed to enter the lagoon from 1982 to 1983, which created conditions amenable to increased leaching of metals from the waste into the ground water.

Based on the Agency's findings, Nameplate's petition for its lagoon was proposed to be denied by the Agency (51 FR 26417, July 23, 1986) due to the unaccounted presence of TCE in the lagoon, the preliminary indications of ground water contamination, and the documented past management history of the lagoon. The etching processes at Nameplate have stopped, and the lagoon is no longer accepting hazardous waste.

In response to a request by Nameplate, Agency Headquarters personnel visited the Nameplate site in August 1986 in order to take 45 additional lagoon sludge samples and two ground water samples for analysis. Nameplate had retreated the lagoon sludge by mixing (which aerated the waste) prior to the Agency's visit in order to reduce possible levels of volatile organic constituents such as TCE. Tce levels in the sludge were found to be lower

than the levels previously documented by Region VII. TCE contamination in the ground water, however, was shown to be at levels higher than previously reported. The agency has prepared a Notice of Availability which will provide an opportunity for interested parties to review and comment upon the analytical laboratory report on the Nameplate site. Publication of this notice in the Federal Register is expected to occur during the week of February 22, 1987.

This summary represents the body of information presently available concerning Nameplate. Some additional technical information on Nameplate's drainage field can be obtained from the Regional docket at the U.S. EPA Region VII Library, 726 Minnesota Avenue, Kansas City, Kansas, 66101. As more information becomes available to the Agency, this information will be made available to the public. If you have any questions please do not hesitate to contact the Agency or EPA Region VII.

Sincerely yours,

Suzanne Rudzinski
Branch Chief
Assistance Branch