CON 12-15
doc # 7532

Ralston Foods ™

Ms. Tami S. Rice
Iowa Department of Natural Resources
Contaminated Sites Section
502 East 9th Street
Des Moines, IA 50319

Re: Soil Contamination Inquiry

Dear Ms. Rice:

In response to the IDNR's June 8, 2006, letter, Ralston Foods has performed a records search to determine the existence of any records relating to fly ash disposal associated with coal combustion. The only records found are included in the enclosed excerpt from a Phase I Environmental Site Assessment report dated August 1993. This report was generated as part of Ralston Purina Company's acquisition of National Oats Company.

IDNR should be aware that the original oat mill was constructed on our property in 1904 and was owned by Pawnee Mill. The mill was sold to National Oats Company in 1910. Ralston Purina Company purchased National Oats Company in October 1993. On April 1, 1994, Ralston Purina Company spun-off a number of its businesses including Ralston Foods, a division of Ralcorp Holdings, Inc., the current operator of the Cedar Rapids, IA, oat mill. As part of the 1993 purchase, Ralston Purina performed the aforementioned Phase I site assessment. No records concerning a former coal fired boiler and disposal of the fly ash generated by it were discovered during the assessment; however, the report does state "Coal ash from the former boiler was disposed on site at one time; however, no associated records could be located. No other information was available (through records or interviews) for waste management practices prior to 25 years ago." Therefore, this statement covers the period from 1968 to 1993. The period of operation of the coal fired boiler is unknown as is the alleged location of the fly ash disposal. We can state that construction projects performed since the 1993 acquisition and involving site excavation have not revealed the existence of fly ash fill material on site. Therefore, the accuracy of the Phase I information gathered through the interview process cannot be verified by Ralston Foods.

If there are additional questions regarding this matter, please contact Randy Manning at 319/368-0259.

Sincerely,

George A. Busha
Plant Manager

Enclosure

cc: Randy Manning, Ralston Foods, Cedar Rapids, IA w/Encl
L. M. Mullen, Ralston Foods, St. Louis, MO w/Encl
K. V. Lensmeyer, Ralcorp Holdings, St. Louis, MO w/Encl

PHASE I ENVIRONMENTAL SITE ASSESSMENT AND COMPLIANCE AUDIT OF THE NATIONAL OATS COMPANY OAT MILL CEDAR RAPIDS, IOWA

RALSTON PURINA CORPORATION ST. LOUIS, MISSOURI

VOLUME I OF II

93-253-4

AUGUST 1993

Burns & McDonnell Waste Consultants, Inc.
Engineers-Geologists-Scientists
Overland Park, Kansas

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EXECUTIVE SUMMARY

The purpose of this Phase I Environmental Assessment and Compliance Audit (audit) is to provide the Ralston Purina Company with an independent, professional opinion regarding the environmental condition and potential environmental risk associated with the National Oats Mill located at 1515 H Avenue NE, in Cedar Rapids, Iowa (Site). The Site, currently operated by National Oats and owned by Curtice Burns Foods, consists of approximately 15.7 acres and is located roughly 1/2 mile east of Cedar Lake and 1 mile from the Cedar River. The primary processes at the Site are related to oatmeal production.

Site visits were made on July 14 and 15, 1993, by Burns & McDonnell Waste Consultants, Incorporated (Burns & McDonnell) personnel. In general, the Site is located in a predominantly residential area along with a few other businesses. A school and a park are also adjacent to the Site. There is no fence around the property. A preliminary identification of surrounding properties was performed. Environmental issues associated with the Site are briefly discussed in the remainder of this Executive Summary.

SOLID AND HAZARDOUS WASTE

On-site records for the ultimate disposal of wastes generated (cradle to grave) were incomplete, and National Oats has not inspected the disposal facilities that receive their waste. Audit findings indicate that National Oats typically leaves the responsibilities of record keeping and inspection of disposal facilities to the various disposal contractors. The Cedar Rapids Landfill, which receives most of National Oats' solid waste, is nearly 30 years old and is approaching closure.

Empty lube oil drums are reconditioned. The drum reconditioner used (R.V. Hopkins of Davenport, IA) has been on the U. S. Environmental Protection Agency's (EPA's) National Priority List (NPL). Other empty drums are either taken home by employees or thrown away.

Ethanol, carbon tetrachloride, petroleum ether, and acetone are stored near the lab. Annual quantities of spent solvents and inks were not known by the facility, and there is no knowledge of an EPA identification number and/or reporting requirements for hazardous waste generators. Safety Kleen records indicate that National Oats is a conditionally exempt, small quantity generator; however, this is only based upon wastes (waste oil, solvents, and ink) handled by Safety Kleen, and does not include other Site hazardous wastes.

Coal ash from the former boiler was disposed of on site at one time; however, no associated records could be located. No other information was available (through records or interviews) for waste management practices prior to 25 years ago.

MISCELLANEOUS OILS

Sufficient quantities of oils, requiring a Spill Countermeasure and Control (SPCC) Plan, are stored throughout the facility; however, National Oats does not have an SPCC Plan for the Site. There was significant oil staining in the air compressor room and adjacent lube oil storage room, small areas in the basements of Buildings A and B, waste oil storage area, and around some of the mechanical equipment on the operating floors (wooden floors). Waste oil may have been used for dust suppression in the past.

UNDERGROUND STORAGE TANKS (USTS) AND LEAKING USTS (LUSTS)

Excavation and removal of four USTs occurred at the Site in April 1989 after National Oats purchased the property of Lloyd's Skelly Station on the corner of E Avenue and 16th Street. Iowa Department of Natural Resources (IDNR) was contacted by National Oats and Howard R. Green Company on April 6, 1989, concerning the discovery and removal of the USTs and contaminated soil. Data bases searched show six UST/LUST sites to be located on, adjacent to, or hydraulically upgradient from the Site.

HERBICIDES/PESTICIDES

Site personnel apply pesticides and herbicides to the property grounds, railcars or trucks, and bins on a regular basis. A sanitarian was hired 2

years ago to oversee the application program. The plant sanitarian was not aware of the application practices performed prior to his employment. Pesticide application records appear to be in order, and storage areas are properly maintained and secured. Fumicel phostoxin and methyl bromide are two restricted-use pesticides applied at the Site. A small bottle of insect growth regulator is kept locked in the sanitarian's office. The Cedar Rapids fire department is notified prior to the methyl bromide fumigation activity.

POLYCHLORINATED BIPHENYLS (PCBS)

Iowa Electric has two pole-mounted and three pad-mounted transformers on the property. All of these were labeled "Non-PCB." Approximately 8 years ago, National Oats replaced and disposed of all internal PCB transformers and capacitors. No records were found indicating PCB releases from equipment during use or disposal.

ASBESTOS

An asbestos removal program has been initiated, but it is not near completion. Economy Solar Corporation (ESCORP) assisted National Oats by performing an asbestos inspection and removing some of the identified asbestos piping insulation. ESCORP disposed of the asbestos insulation at the Cedar Rapids Landfill, Linn County Landfill, and the Upper Rock Island County Landfill (East Moline, IL). However, only limited disposal documentation listing the Upper Rock Island County Landfill was found. Asbestos was identified and removed from the roof of Buildings H-1, G, D, and part of Building A by Howard R. Green Company. Not all roofs were sampled. Asbestos is potentially present in the boiler area insulation, on a portion of the main steam line, in an underground utility tunnel, and on various hard to reach pipes throughout the facility.

Iowa Occupational Safety and Health Administration (IOSHA) was notified of potential asbestos exposure by a Site employee. IOSHA issued a citation, and an appeal for dismissal was filed by National Oats. No record of the final decision was located during the Site visit.

The ceramic shop (Lot 18) was probably constructed in the 1940s, and may contain asbestos. Floor tile, measuring 9 inches by 9 inches, and attic insulation were encountered. Houses located on National Oats property were not entered but may also contain asbestos.

LEAD

Due to its age, portions of the facility may have been coated with lead-based paint at one time. Additionally, lead solder may be present in water pipes located in the mill and the adjacent houses. Lead and heavy metals such as chromium can be present in the fluids generated from battery washing. Concrete floors in both battery washing areas were pitted and discolored near the floor drains; this may be due to battery acids.

Leaded gasoline was probably stored and distributed at the former gas station; however, no soil or groundwater samples were collected for lead analysis during UST removal.

AIR

The Site has a total of 24 baghouse filters to control dust emissions. The truck loading area located southwest of Building H-1 emitted a considerable amount of dust during truck loadout.

Many complaints from neighbors, mostly from 10 to 20 years ago, relating to dust problems were found in the Linn County Health Department - Air Quality file. Additionally, several notices of violation were found. Periodic inspections are performed by Health Department personnel.

RADON

IDNR recently (1992) published a survey that found an average radon level for this area to be approximately 4.3 pCi/L. Values ranged between 0.1 pCi/L and 24.3 pCi/L. Radon is of greater concern for facilities with basements, such as this one.

WASTEWATER

The facility is connected to the city's sanitary sewer system, with all inside floor drains believed to be connected to this system. Waste streams that appear to discharge to sanitary sewers include oils leaking from the air compressor room, corrosive liquids from the battery charging/washing area (may also contain heavy metals), suspended solids from washing baghouse filter socks, and some laboratory wastes. Cedar Rapids Water Pollution Control had no complaints or problems on file regarding the plant wastewater, and no sampling had been required due to the fact that the water was believed to be mainly sanitary discharge.

STORM WATER

No storm water discharge application has been filed by National Oats for the Site. Main storm sewer outfalls are believed to be located along E Avenue and from the vicinity of the Packaging Building (Building X).

* * * * *

2.0 SITE BACKGROUND

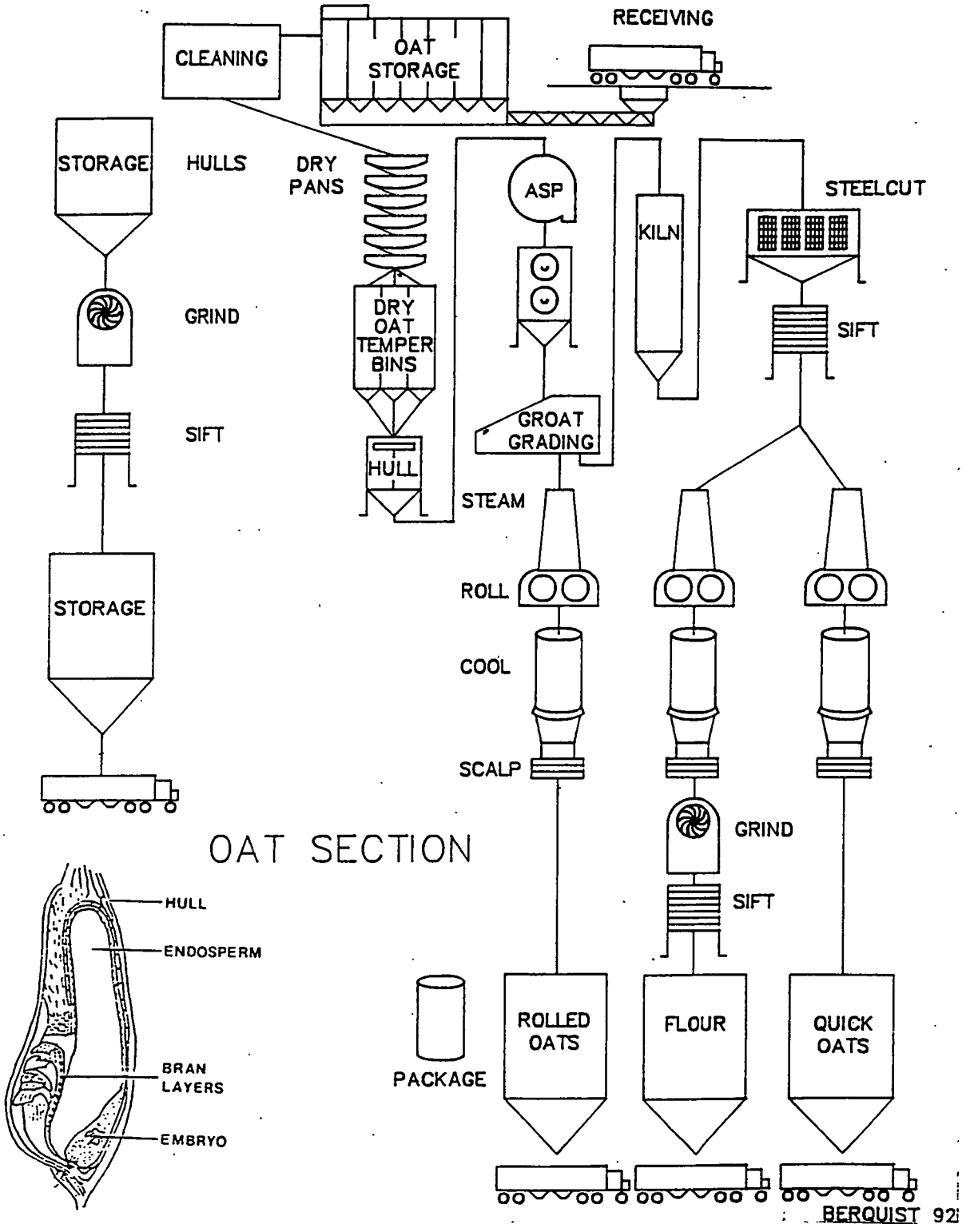
The Standard Industrial Classification (SIC) code for the Site is 2043, and it is zoned for industrial use (I2-A). Operations at the Site include the cleaning, drying, and dehulling of oats for the production of oatmeal. Oatmeal is packaged in tubes and bulk bags on Site in the new packaging building. (A facility process flow diagram is provided as Figure 2-1.) Since this is a completely dry process, limited wastes result from it. Oat hulls are sold as animal feed and the remaining wastes are managed as discussed in Section 3.0 of this report. Photos 1 through 8 show the Site from all sides and provide close-ups of some of the buildings.

2.1 SITE HISTORY

The original mill (the Pawnee Mill) was constructed in 1904 and purchased by National Oats in 1910. Although complete chain of ownership information has not been received, it is believed that the current office building at 1515 H Avenue was formerly a stove factory before becoming property of National Oats in the 1920s or early 1930s. A circular storage bin, originally an oil storage tank in Oklahoma, was re-constructed on Site somewhere between 1913 and 1949. A new 16,000-square-foot concrete warehouse was constructed in 1976, and a new truck unloader was installed in 1978. In 1990, a steel frame maintenance building and a packaging building were constructed; an addition was made to the office building in 1991. Aerial photographs taken in 1975, 1980, 1985, and 1990 are provided in Appendix E. A current Site map, showing the property line and sewer pipes, is provided in Appendix F.

Sanborn Maps were obtained for the years 1910, 1913, 1949, and 1970 (See Appendix G). The 1913 map indicated that there had been a covered water reservoir, presumably used for water feed to the boiler. The reservoir was located south of the existing Building O (Maintenance). A gasoline station was located on the corner of 16th Street and E Avenue on the 1949 maps. Two underground gasoline tanks were present, along with an indication of a grease garage or storage area. A building south identified as "MILL BUILDING" on the Site plan provided by National Oats was part of The Hamilton Company, a

NATIONAL OATS COMPANY MILLING FLOW



OAT SECTION

Burns & McDonnell Waste Consultants, Inc.

Figure 2-1

NATIONAL OATS FLOW DIAGRAM

distributor of wholesale feeds, seeds, and implements. According to the Site plan, the property line longitudinally intersects this building.

2.2 ADJACENT PROPERTIES

In general, the Site is located in a predominantly residential area along with a few other businesses. A school and a park are adjacent to the Site. There is no fence around the property. A preliminary identification of surrounding properties was performed. Many of the buildings, along the railroad tracks south of the main mill, appear to be vacant. Properties include a facility that manufactured banking equipment (Le Febure Corporation), a motor freight station, and The Hamilton Company buildings. Each of these properties is owned by individuals at this time. North of the office building, across H Avenue, CedaRapids Raytheon manufactures parts for forklifts. Photos 9 through 22 show the perimeter of the Site and some surrounding properties.

2.3 SITE GEOLOGY AND HYDROGEOLOGY

This section describes the physical setting of the Site in terms of geology, hydrogeology, and the associated potential for migration of contaminants in the subsurface, should a release occur.

2.3.1 Geology

Topography in the Site vicinity is generally of low relief since the Site is situated on the valley floor of the Cedar River. The eastern valley wall is located approximately 1/2 mile east of the Site. Topsoil in the Site area is underlain by Kansan age glacial drift (Prior, 1976) and Devonian age bedrock.

Topsoils within the city limits of Cedar Rapids have not been assigned to a soil association. Soils in this area generally belong to the Loamy Alluvial Land-Sparta-Spillville association. These topsoils are nearly level to moderately sloping soils on bottom lands and stream benches. Sparta soils of this association are excessively drained, and other areas are prone to flooding. These soils consist primarily of sand and clayey sand. Engineering classifications have not been assigned to this soil association (Schermerhorn and Highland, 1975).

Underlying the topsoil is a mixture of clay, silt, sand, gravel, and boulders that were deposited by a glacier. Devonian age bedrock of the Wapsipinicon Formation underlies the unconsolidated materials at the Site. The formation contains limestone, dolomitic limestone, gypsum, and sandy shale (Hershey, 1969).

2.3.2 Hydrogeology

Regional groundwater may be obtained from shallow unconsolidated deposits, deep unconsolidated deposits, and bedrock. The shallow unconsolidated deposits are arbitrarily limited to a maximum depth of 100 feet and consist of sand, gravel, silt, and weathered glacial tills. Wells screened in these deposits generally have low yields and are used mainly for low-production private wells. Localized areas where sand and gravel deposits are present may produce moderate amounts of water to wells (Iowa Natural Resources Council, 1955).

Groundwater in the deep unconsolidated deposits is generally highly mineralized and typically are not used for water supply (Iowa Natural Resources Council, 1955).

The Devonian age bedrock are excellent producers of fresh water and are considered to be the most important aquifers in the area. Groundwater from these limestone formations may supply water for industrial and municipal purposes; however, the city of Cedar Rapids obtains the majority of its drinking water from the Cedar River.

Generally, groundwater in the Site vicinity is assumed to flow to the southwest, discharging into Cedar Lake which is located approximately 1/2 mile southwest of the Site. This assumption is based upon Site topography rather than actual groundwater flow data.

* * * * *

status. It was believed by manufacturing and purchasing personnel that accounting may keep copies of Safety Kleen receipts; however these have not been located as of this report. There are three parts washers present in the Maintenance Building O.

The on-Site boiler is no longer used (Photo 33). Originally, this was a coal-fired boiler; it was later converted to a natural gas-fired boiler. According to employees, coal ash from the boiler was disposed of on Site at one time; however, no associated records could be located.

No information was available (through records or interviews) about waste management practices prior to 25 years ago (tenure of the interviewed employee with the most experience at the plant). Representatives of the Linn County Health Department were interviewed regarding National Oats' solid and hazardous waste management records. They could not locate any records of solid or hazardous waste issues related to the Site. No special solid waste disposal permits are required for the plant.

3.2 MISCELLANEOUS OILS

Oils used at the facility include lube oils, air compressor oils, vehicle maintenance oils, hydraulic fluids, and various gear oils and greases. Sufficient quantities of oils, requiring the facility to have a Spill Prevention, Control, and Countermeasures (SPCC) Plan, are stored throughout the facility, with bulk storage in the Maintenance building (Building O) and in the air compressor area (Building E-1). National Oats does not have an SPCC Plan for this facility.

Waste oils are collected and stored outside in drums located along the southwest wall of Building P (Storage). None of the drums were labeled. Although there was an overpack storage container to allow for contained and covered storage of two waste oil drums, four other waste oil barrels were located beside the overpack, one without a bung hole cover. There was oil staining on the concrete, and storm water runoff from this area would enter a storm sewer system (Photos 34 and 35). National Oats relies on Safety Kleen to notify them of a needed waste oil pick-up.

5.0 SUMMARY OF ASSESSMENT FINDINGS

Based on the information collected and observations made during the Site survey, the findings of the audit are listed below.

SOLID AND HAZARDOUS WASTE

- On-Site records for the ultimate disposal of wastes generated (cradle to grave) were incomplete, and National Oats has not inspected the disposal facilities that receive their waste. Audit findings indicate that National Oats typically leaves the responsibilities of record keeping and disposal facility inspection to various disposal contractors.

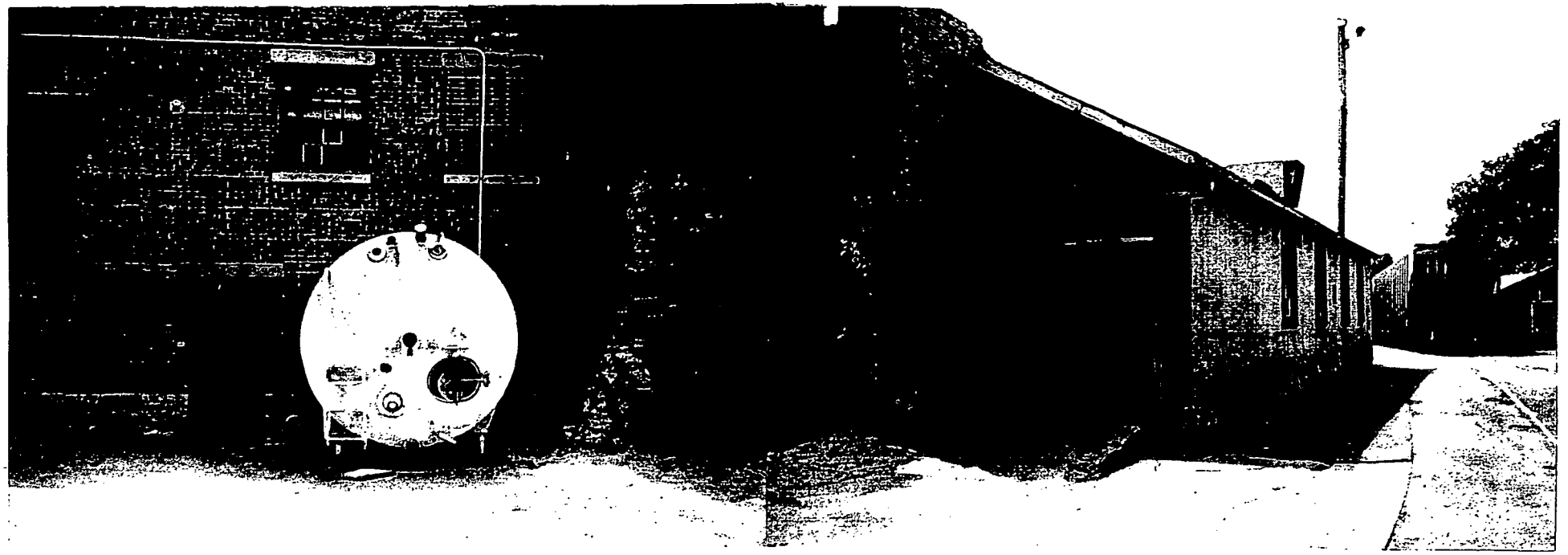
- Cedar Rapids Landfill is nearly 30 years old and is approaching closure.

- Empty lube oil drums are reconditioned. Other empty drums are either taken home by employees or thrown away.

- Ethanol, carbon tetrachloride, petroleum ether, and acetone are stored near the lab.

- Annual quantities of spent solvents and inks were not known by the facility, and there is no knowledge of an EPA identification number and/or reporting requirements for hazardous waste generators. Safety Kleen records indicate that National Oats is a conditionally exempt, small quantity generator; however, this is only based upon wastes (waste oil, solvents, and ink) handled by Safety Kleen and does not include other Site hazardous wastes.

- Coal ash from the former boiler was disposed of on Site at one time; however, no associated records could be located. No other information was available (through records or interviews) about waste management practices prior to 25 years ago.



NORTH SIDE OF FORMER BOILER HOUSE. PHOTO ALSO SHOWS A NO LONGER USED WASTEWATER TANK AND THE FORMER BOILER STACK LOCATION.

FORMER BOILER INSIDE BOILER HOUSE.

Photo 33

PHASE I ENVIRONMENTAL SITE ASSESSMENT AND COMPLIANCE AUDIT OF THE NATIONAL OATS COMPANY OAT MILL CEDAR RAPIDS, IOWA

RALSTON PURINA CORPORATION ST. LOUIS, MISSOURI

VOLUME II OF II

93-253-4

AUGUST 1993

Burns & McDonnell Waste Consultants, Inc.
Engineers-Geologists-Scientists
Overland Park, Kansas

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DATE: 3-31-83

TO: MR. GREG SLAGER AIR POLLUTION CONTROL OFFICER

FROM: MR. ROBERT WILLIAMS PLT. ENGR. NATIONAL OATS CO.

SUBJECT: REPORT OF EXCESS EMISSION

A. EMISSION ORIGIN: BLACK SMOKE EMITTING FROM MURRAY BOILER SMOKE STACK.

B. ESTIMATED QUANITY: UNKOWN.

C. TIME AND DURATION: 10 TO 12:00AM 3-28-83 12 TO 2PM 3-24-83

D. CAUSE OF EMISSION: IMPROPER AIR & NATURAL GAS MIXTURE FOR EFFICIENT COMBUSTION.

E. REMEDY STEPS: REPAIR DRAFT DAMPER & CHECK OUT GAS REGULATOR. CALLED B. G. BRECKE CO. TO MAKE REPAIRS 3-24-83 & 3-28-83

F. STEPS TO LIMIT EXCESS EMISSION: NATIONAL OATS BOILERMAN MANUALLY ADJUSTED DAMPER AND GAS REGULATOR UNTIL EXCESS EMISSION STOPPED & CONTRACTOR ARRIVED.

G. MALFUNCTION DOCUMENTATION: CONTRACTOR COULD FIND NOTHING WRONG AFTER INSPECTING DAMPER ASSEMBLY AND GAS REGULATING TRAIN. SUSPECT GAS LINE PRESSURE FLUCTUATION OR BUMPING OF DRAFT DAMPER ASSEMBLY .