

**IOWA DEPARTMENT OF NATURAL RESOURCES
FIELD SERVICES AND COMPLIANCE BUREAU
FIELD OFFICE #2 - MASON CITY IOWA**

DATE: **October 27, 2009**

TO: **The Record**

FROM: **Glenn Carper** 

SUBJECT: **United Suppliers – Eldora
Spill # 102609-KAL-1100**

I visited the spill site on the afternoon of October 26th to make sure the spill was contained and that clean up had been initiated. Upon arrival at the facility I met with Jim Michaelson, Loss Control Manager; Dave Hoyt, Chemical Division Commercial Manager and Brent Hallett, Operations Supervisor. We discussed the spill, its causes and the measures to be taken to adequately clean it up.

Brent explained that they had been recirculating the Keystone herbicide in a tank to mix it up. Keystone is an atrazine based broadleaf herbicide and is very viscous. It almost has the appearance of a white latex paint. The tank that they had been recirculating is manifolded together with three other tanks. Unknown to the operator, a valve to a full tank of Keystone had been left open. The open valve caused this tank to overfill and run out of the tank vent. All of these tanks are located inside a building at the west end of the facility. The vent pipe passes through the roof. The Keystone flowed down the roof to the rain gutter and from there down two of the downspouts. The downspouts discharge into plastic collector tile that are tied into a tile line that passes around the north and west sides of the building and discharges to a dry ditch between the facility's storm water pond and the adjacent railroad tracks. From here the ditch proceeds south under a highway overpass and eventually discharges into an unnamed tributary to the South Fork of the Iowa River.

When the operator became aware of the problem, the pump was shut off and facility managers were made aware of the spill. A dike was constructed across the ditch to contain the spilled herbicide. A second dike was constructed upstream and a sump was dug to facilitate pumping of the herbicide out of the ditch. Recovered material was being pumped into 110 gallon totes for storage. One tote had been filled by the time I arrived.

Mr. Hoyt informed me that the recovered herbicide would be sent to a hazardous waste incinerator in Wisconsin for proper disposal. United Suppliers was also proposing to dig contaminated soil from the ditch and stockpile it on site until it could be land applied. Mr. Hoyt also stated that the tile line around the west and north sides of the building was going to be dug up. This tile is perforated so it is unknown if the herbicide exfiltrated out of the tile into the surrounding soil. Mr. Hoyt said that they had decided to go ahead and dig up the tile and the surrounding soil to make sure that all of the herbicide impacted soil was removed.

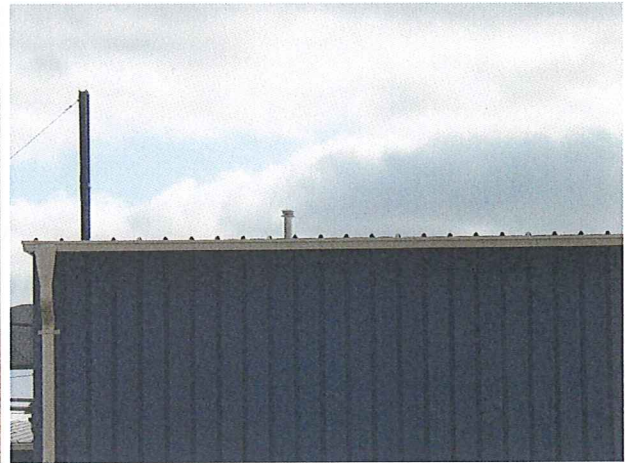
Soil is to be stockpiled north of the railroad tracks on the northwest corner of the facility site. Plastic will be placed on the ground and the soil will also be covered to protect it from rainfall until it can be properly land applied. The soil stockpile area is located on a portion of the plant property that drains to the facility's storm water pond. Mr. Hoyt stated that the soil would be tested to determine a proper application rate. He said that it would be applied at, or below,

agronomic rates. He stated that they would have to find a farmer willing to take the soil. He stated that they were thinking of using a dry manure spreader with beater bars to spread the soil. He also proposed to leave the land applied contaminated soil unincorporated so that the herbicide would quickly break down through evaporation and the action of sunlight. I advised them that these actions all sounded reasonable.

We then visited the spill site. I verified that the dikes had stopped the progress of the spill material and that clean up activities had commenced. The ditch was dry down stream of the first dike. The tile line had been located upstream of the outfall and had been cut and plugged to prevent further discharge. Photos of the ditch, the dikes, tile outfall and building were taken. I also visually checked the potential receiving stream to verify that there had been no impact from the spill in case there was a second unknown tile line. There was no impact on the stream. The water was clear with no odor. I did not observe any tile outfalls. I verified that the spill was contained on United Suppliers property, that there was little likelihood of it spreading further and that properly clean up was underway.



Building where spill occurred
Note: tote of recovered product



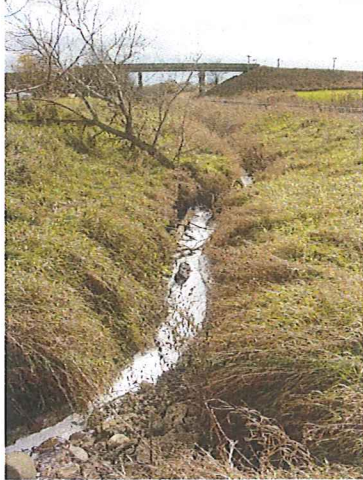
Vent on top of building (looks like a furnace vent)



Downspout discharge to tile



Tile outfall



Discharge to ditch



Dike to stop flow in ditch



Dike stopping the flow of spilled material



Dry ditch downstream of the dike



Sump area for pumping up spilled material



Pump



Locating the tile line closer to the building
and plugging it



Proposed area for stockpiling soil



Potential receiving stream



Water in stream is clear

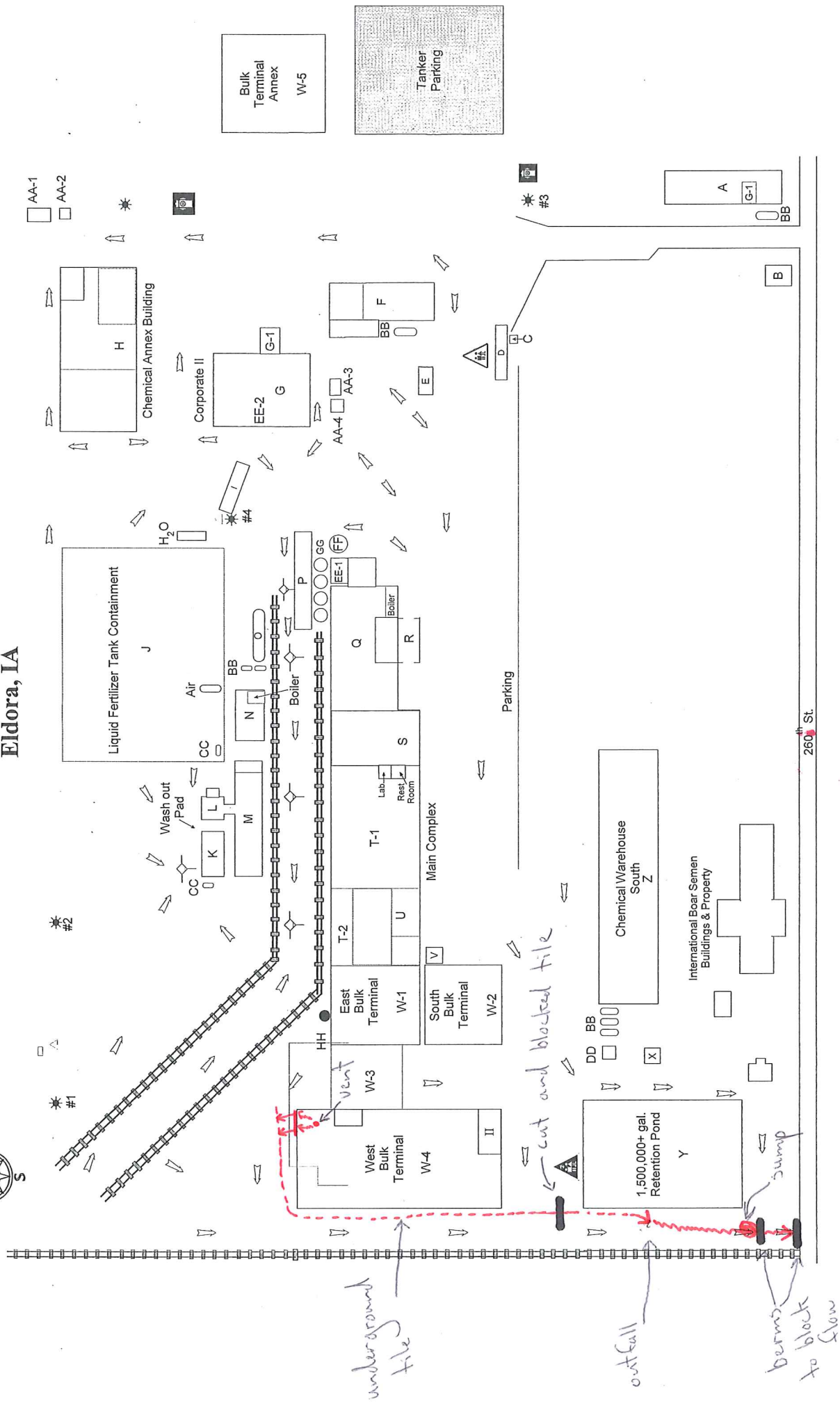
c: Emergency Response

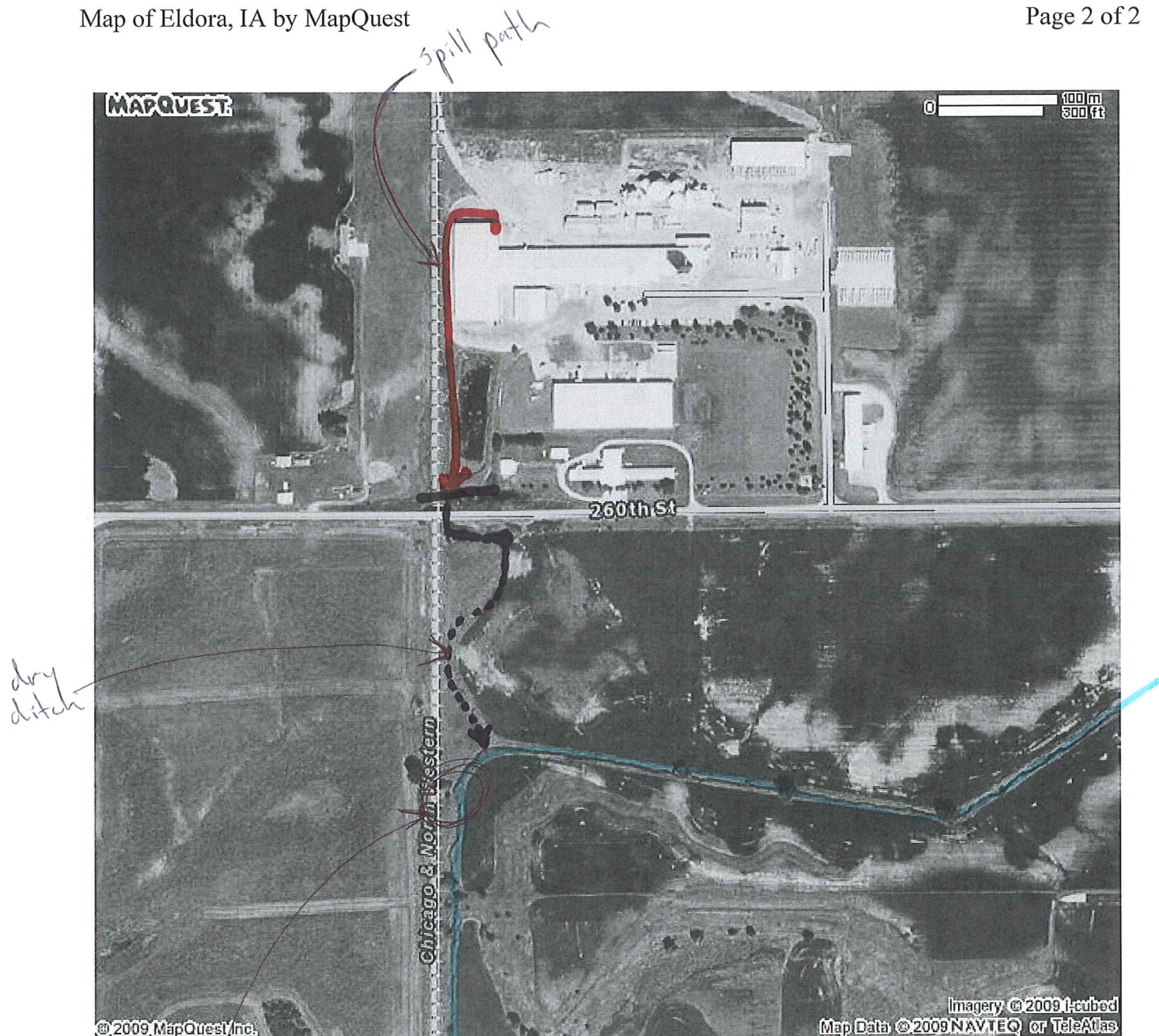
March, 2009

SITE MAP

United Suppliers, Inc.

Eldora, IA





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observed
potential receiving
stream at
this location