UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: October 1, 1982

SUBJECT: Preliminary Inspection, American Walnut Company
Kansas City, Kansas

FROM: William J. Keffer
Chief, EP&R/ENSV

TO: Robert L. Morby
Chief, WMBR/ARWM

THRU: John C. Wicklund
Director, ENSV

David A. Wagoner
Director, ARWM

Attached for your records is the preliminary inspection report for the subject facility. No hazardous materials or potential sources of hazardous materials were located during the inspection of the facility and no further actions appear to be necessary.

Attachment

cc: Michael J. Sanderson
Chief, AWCM/ARWM

EPA-ARHM/HAZM
OCT 05 1982
Region VII K.C., MO

AMERICAN WALNUT CO.
Preliminary Site Inspection Report

Prepared by
Gary B. Snodgrass
Emergency Planning and Response Branch

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INTRODUCTION

In May of 1980, EPA overflights indicated possible hazardous waste site or discharge activity at the American Walnut Company on the Kansas River in Kansas City, Kansas. Air and Waste Management Division requested a preliminary hazardous waste site inspection at this location. Emergency Planning and Response Branch determined that because of difficulty in interpretation of photography, it was unknown at the time of the inspection request that two companies are indicated by the photography. A preliminary site investigation was carried out at the American Walnut Company and a brief site visit was made to the Frank Purcell Walnut Lumber Company which is due east of American Walnut Company.

INSPECTION REPORT

Reconnaissance

Inspection activities began on the week of September 6, 1982, and culminated on September 10. Reconnaissance activities included an area physical reconnaissance, discussions with Kansas City Water Pollution Control workers in the area, and review of maps and records.

On Tuesday, September 7, 1982, Emergency Planning and Response Team inspector, Gary B. Snodgrass, and Technical Assistance Team member, Michael Erbaugh, carried out a thorough reconnaissance of the site. Aerial photographs and maps were studied before physical reconnaissance around the southern perimeter of the plant property.

Records were searched at the EPA Region VII Regional Headquarters and no NPDES or RCRA files could be found.

A trip around the southern perimeter of the site was carried out by driving along the U.S. Corps of Engineers Levee.

Approximately 30 drums of an unknown product were noticed at the southwest central area of the plant. The drums were constructed of a fibrous cardboard material and there were two 20-foot high piles of wood chips at the southeast edge of the plant property which had a dark colored liquid pooled around the

edges. One-fourth mile further east, near the levee, there was a link fence which appeared to divide American Walnut Company from other properties. One-eighth mile further east there was another dividing fence and what appeared to be a lumber company. Aerial photographs indicated a lumber mill in this location.

On the southwest edge of the lumber mill property there was a larger holding basin (approximately 10,000 gallon capacity) with standing liquid inside. Connected to the basin was a 3 1/2" - 4" PVC pipe which ran to the south through the Corps of Engineers levee and into the Kansas River.

SITE VISIT

Mr. William Fligg, plant manager, was contacted on the afternoon of September 7, 1982, and agreed to allow us to inspect the plant at 2:00 pm on September 8, 1982.

Upon arrival at the plant at the designated time and date, inspectors credentials and business cards were presented to Mr. Fligg and a discussion followed about the types of processes carried out at the plant.

The American Walnut Company is a privately-owned company which is almost exclusively in the business of supplying gun stocks for the sporting arms industry. There is a small part of the business which supplies walnut lumber for a small number of furniture businesses in the Kansas City Metropolitan Area. Until early 1980, the company sliced and dried veneer for the home improvement industry.

Walnut logs for the manufacture of products are obtained within a 500-mile radius of the Kansas City Metropolitan area.

The first cut gun stocks are prepared from these logs and wood chips and shavings are used in the wood burning unit on the plant. This unit is a "Wellons" 175 HP unit which generates heat and steam for the plant. Steam is

used to supply the kilns for drying the stocks. Wood chips and shavings are stored in the open at the south end of the plant. Rainwater sets in pools in the area and derives a slight color from the chips. The fluid appears much darker viewed from the levee road. No odors were detectable in this liquid and no sample was taken.

The woodburning unit is inspected every year by the Kansas Department of Health and Environment and by Mr. Ray Greliner of the Wyandotte County Air Pollution Control Department. The company received an Environmental Quality Award from the U.S. Environmental Protection Agency for the installation of this unit to stem air pollution from their woodburning process. The company was cited for an air pollution violation in 1975 when they used a "Tee-pee" wood burner. There is approximately 1,000 cubic feet/month of ash waste from the present burner system which is disposed of by Walter Disposal Service in Kansas City, Missouri. A copy of analysis is attached.

The area where the fibrous drums were stored was inspected next. These drums contain a wax product which is used to coat stocks and furniture boards for shipment. The wax is actually petrolatum 250, a Phillips Petroleum Company product and is an innocuous compound which is approved by the FDA for use in the food preparation industry. An invoice and toxicty reference for the product are included with this report.

There is no plant wastewater generated by any process on the plant and thus no treatment of wastes of any kind. There is a discharge of plant runoff water directly into the Kansas River. The drainage used to accumulate on the property and sometimes flood it. Since the Army Corps of Engineers built the levee system, the water has been gathered in a holding basin on the north side of the levee and pumped periodically into the River. Approximately one and one-half years ago, the company decided to collect the plant runoff in an 8,000 gallon steel holding tank and pump to the river as before. This was done primarily to keep debris out of the water pumped to the river and for insect control on the plant. Visual inspection of this runoff fluid indicates that it is, in fact, rainwater runoff. A sample was not collected at this location or any other location on site.

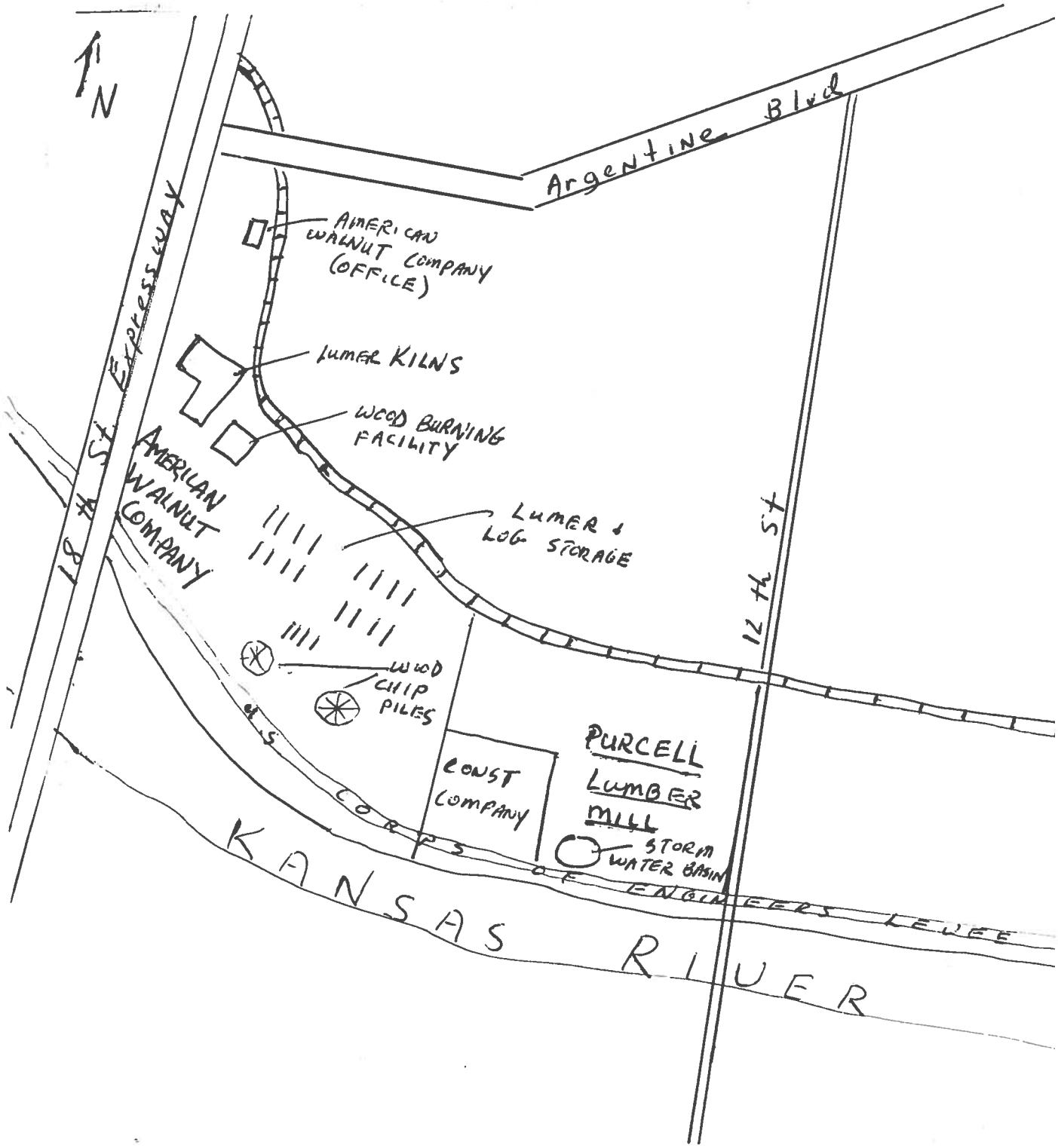
Mr. Fligg was asked about the pipe and open basin at the east end of the levee that was indicated in the aerial photography. He informed us that the subject basin and pipe was probably on the Frank Purcell Lumber Company Property which is located due east of American Walnut.

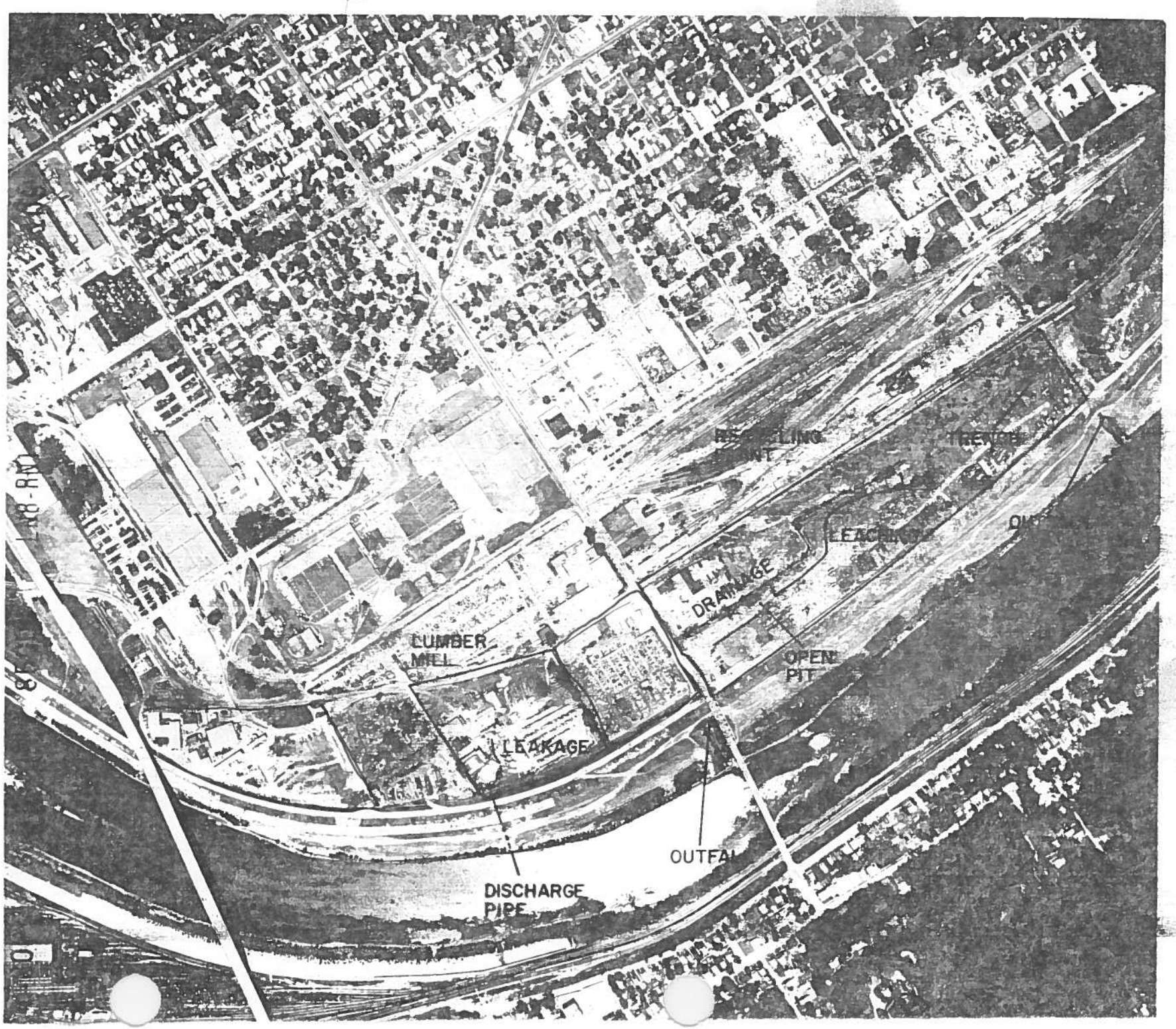
A short visit was made to the Frank Purcell Lumber Company on Thursday, September 9, 1982. Mr. Robert Chronister, plant superintendent, met inspectors at the front office. ID and business cards were shown to Mr. Chronister and he was then interviewed. He informed inspectors that the holding basin at the southwest corner of the lumber mill was to collect rainwater and plant runoff. The pipe that was connected to the basin was a

3 1/2" plastic pipe and was approved to run through the levee by the U.S. Corps of Engineers. This runoff is periodically discharged to the River. The discharge used to be under the NPDES system, a Kansas Department of Health and Environment (KDHE) program; however, KDHE has discontinued monitoring this effluent. Mr. John Metzler is the KDHE contact regarding the discharge at this Company and the American Walnut facility.

CONCLUSION

Inspection at the American Walnut Company on September 8, 1982, focused on a discharge identified by aerial photography. Additional information on plant process and wastes was gathered at the time of the inspection. It was determined that the subject discharge was actually from the Frank Purcell Lumber Company and this discharge is rainwater runoff from the plant property. American Walnut has a similar discharge but the discharge is hidden from aerial photography by the 19th Street Expressway. There is very little waste generated by the plant and no process discharge. There are no stains or varnishes on site and no hazardous materials. No sample was collected at either the American Walnut or the Frank Purcell Lumber Company rainwater discharge systems because the Kansas Department of Health and Environment has monitoried the Purcell discharge and determined that an insignificant level of pollutant concentrations are detectable. Photographs were taken at American Walnut and the soil survey for the pertinent section of Wyandotte County has been included with this report.


N
Argentine Blvd
18th St Expressway
12th St
AMERICAN WALNUT COMPANY (OFFICE)
LUMER KILNS
WOOD BURNING FACILITY
AMERICAN WALNUT COMPANY
LUMER & LOG STORAGE
WOOD CHIP PILES
CONST COMPANY
PURCELL LUMBER MILL
STORM WATER BASIN
U.S. CORPS OF ENGINEERS LEVEE
KANSAS RIVER


LUMBER MILL
LEAKAGE
DISCHARGE PIPE
OUTFAL
DRAINAGE
OPEN PIT

EPA

POTENTIAL HAZARDOUS WASTE SITE
FINAL STRATEGY DETERMINATION

REGION	SITE NUMBER
VII	000010159

File this form in the regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force *(EN-335)*; 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME	B. STREET	
American Walnut Company	18th & Argnetine Blvd	
C. CITY	**D. STATE**	**E. ZIP CODE**
Kansas City	Kansas	66106

II. FINAL DETERMINATION

Indicate the recommended action*(s)* and agency*(ies)* that should be involved by marking 'X' in the appropriate boxes.

RECOMMENDATION	MARK 'X'	ACTION AGENCY: EPA	STATE	LOCAL	PRIVATE
A. NO ACTION NEEDED		XXX			
B. REMEDIAL ACTION NEEDED, BUT NO RESOURCES AVAILABLE *(If yes, complete Section III.)*					
C. REMEDIAL ACTION *(If yes, complete Section IV.)*					
D. ENFORCEMENT ACTION *(If yes, specify in Part E whether the case will be primarily managed by the EPA or the State and what type of enforcement action is anticipated.)*					

E. RATIONALE FOR FINAL STRATEGY DETERMINATION

According to preliminary site investigation, very little waste is generated by American. No hazardous materials are stored on the site; no plant waste-water generated by plant processes; discharge pipe detected on air photos belonged to Purcell Lumber Co. just east of American. This pipe which is connected to an open basin discharges runoff rainwater that is collected in the basin. American has a similar system for collecting and discharging runoff from the plant area into the Kansas River.

F. IF A CASE DEVELOPMENT PLAN HAS BEEN PREPARED, SPECIFY THE DATE PREPARED *(mo., day, & yr.)*	G. IF AN ENFORCEMENT CASE HAS BEEN FILED, SPECIFY THE DATE FILED *(mo., day, & yr.)*

H. PREPARER INFORMATION

1. NAME	2. TELEPHONE NUMBER	3. DATE *(mo., day, & yr.)*
WMBR/SPFD Sec. J. Patrick Costello	374-6531	October 12, 1982

III. REMEDIAL ACTIONS TO BE TAKEN WHEN RESOURCES BECOME AVAILABLE

List all remedial actions, such as excavation, removal, etc. to be taken as soon as resources become available. See instructions for a list of Key Words for each of the actions to be used in the spaces below. Provide an estimate of the approximate cost of the remedy.

A. REMEDIAL ACTION	B. ESTIMATED COST	C. REMARKS
Based upon all available information on file, no further action appears to be necessary concerning this site.	$	
	$	
	$	
	$	
	$	
	$	
	$	
D. TOTAL ESTIMATED COST	$	

EPA Form T2070-5 (10-79)

Continue On Reverse