

PEPER, MARTIN, JENSEN, MAICHEL AND HETLAGE

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FORT MYERS, FLORIDA 33901

(813) 837-3850

200 N. WOOD RIVER AVENUE

WOOD RIVER, ILLINOIS 62095

(618) 251-4983

RECEIVED
SECTION 77
JUL 19 1984 9:00
ST. LOUIS BRANCH

July 16, 1984

Mr. David Price
Environmental Engineer
United States Environmental
Protection Agency, Region VI
Inter First two Building
1201 Elm Street
Dallas, Texas 75270

Re: Baldor Electric Company and
Industrial Waste Control Site
Fort Smith, Arkansas

Dear Mr. Price:

As you know, my law firm represents Baldor Electric Company of Fort Smith, Arkansas. Baldor Electric Company has been identified by the Environmental Protection Agency as a Potential Responsible Party regarding the Industrial Waste Control Superfund Site located near Fort Smith.

In response to the EPA's Section 104 CERCLA Request, I forwarded to you on February 8, 1984 Baldor's Response stating in part:

Baldor Electric Company has not disposed, treated, or stored any hazardous substance, as defined under Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, or hazardous waste as defined under Section 1004(5) of the Resource Conservation and Recovery Act at the Industrial Waste Control Site in Sebastian County, Arkansas.

On February 9, 1984, I advised you that Baldor would provide the EPA with support for its position that it did not dispose of hazardous waste at the Industrial Waste Control Site. This letter provides such support.

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Page Two
July 16, 1984
Mr. David Price

Baldor's information indicates that it made limited use of the Industrial Waste Control Site during the last half of 1976 and the first part of 1977. Approximately 106 55-gallon drums of liquid waste were pumped into Industrial Waste Control (IWC) tank trucks during those years. Baldor cannot be certain whether or not the waste was taken to the Industrial Waste Control Site near Fort Smith.

Baldor's information indicates that the 106 drums pumped by IWC in 1976 and 1977 contained only machine cutting coolant. Accordingly, Baldor conducted tests to determine whether or not the spent cutting coolant generated at the time was hazardous under federal law.

Under the direction of Baldor's Quality Control Manager, Ken Woodward, the Company purchased a quantity of the cutting coolant generally used at the time in the Fort Smith Plant. Baldor then obtained a sample of spent coolant by running a controlled test at the Fort Smith Plant during March, 1984. The attached Verified Procedure and Custody of Waste Test Samples sets out in detail the procedures used by Baldor to obtain the spent coolant samples and to maintain custody of the samples (Exhibit 1).

The coolant samples were then tested by the Laclede Gas Company Laboratory Division and analyzed by Environmental Consultant Joseph Eigner. The Laclede Gas Company Laboratory Division is an approved testing laboratory located at 4118 Shrewsbury Avenue, St. Louis, Missouri. Joseph Eigner holds a Ph.D. in Chemistry from Harvard and is the principal officer of Joseph Eigner & Co., an environmental consulting service in St. Louis, Missouri. Joseph Eigner concludes that the waste coolant generated at Baldor Electric Company's Fort Smith Plant at the time in issue was not a hazardous substance or hazardous waste as defined by federal environmental laws.

A copy of Joseph Eigner's Analysis of the machine cutting coolant, along with a January 17, 1984 statement of the coolant's components by its manufacturer, and of the Laclede Gas Company's Laboratory Report are attached to this letter (Exhibits 2, 3 and 4).

On June 1, 1984, Baldor representatives, Joseph Eigner and myself met with Mr. Samuel L. Nott and EPA Attorney, Pamela Phillips, and discussed Baldor's status as a Potential Responsible Party. It is Baldor's position that it should not be considered a Responsible Party for investigative or clean-up costs regarding the IWC Superfund Site.

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PEPER, MARTIN, JENSEN, MAICHEL AND HETLAGE

Page Two
July 16, 1984
Mr. David Price

Baldor will continue, however, to fully cooperate with the
EPA's investigation of the Industrial Waste Control Site.

Sincerely,



Richard E. Jaudes

REJ:jks

Encls.

cc: Mr. Samuel L. Nott

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

003565

BEFORE THE
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
DALLAS, TEXAS

VERIFIED PROCEDURE AND CUSTODY
OF WASTE TEST SAMPLES

This verified document describes the procedure used by officials of Baldor Electric Company to obtain samples of waste machine cutting coolant similar to that generated at Baldor's Fort Smith Motor Plant during the relevant time at issue in the present EPA investigation of the Industrial Waste Control Site in Arkansas. This document also sets out the steps followed by Baldor officials to control and maintain custody of the samples of waste coolant.

Accordingly, the procedures used to obtain the waste coolant samples and to maintain custody of the samples are as follows:

1. On February 14, 1984, and at the direction of the Company's Quality Control Manager, Ken Woodward, Baldor ordered a 20-gallon drum of Long Life Universal Coolant from Certified Laboratories in Fort Worth, Texas. Long Life Universal Coolant is the same machine cutting coolant generally used by Baldor at its Fort Smith Plant during the time at issue in the present EPA investigation. The 20-gallon drum of Long Life Universal Coolant was re-

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Exhibit 1

ceived at Baldor's Fort Smith Plant on March 8, 1984.

2. On March 15, 1984, again at the direction of Ken Woodward, Baldor ordered 10 gallons of A. W. Hydraulic 68 Oil from Port City Oil Company in Fort Smith, Arkansas. A. W. Hydraulic 68 Oil is essentially the same oil used in Company machines' hydraulic systems during the time at issue in the present EPA investigation. The 10 gallons of A. W. Hydraulic 68 Oil were received at Baldor's Fort Smith Plant on March 30, 1984.
3. Quality Control Manager, Ken Woodward, took custody of the above-mentioned 20-gallon drum of Long Life Universal Coolant. Baldor's Fort Smith Maintenance Supervisor, Gene Redden, took custody of the A. W. Hydraulic 68 Oil.
4. On Tuesday, March 13, 1984, and at the direction of Ken Woodward, Baldor drained and cleaned a Hitachiseki 4-D Turret Lathe Machine -- identification number 24338. This same machine was used during the time at issue in the present EPA investigation and is representative of the type of machines used at Baldor during the time.
5. After purging the machine, and at the direction

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of Ken Woodward, Baldor poured A. W. Hydraulic 68 Oil into the hydraulic oil reservoir of the Turret Lathe Machine. Mr. Woodward also directed the filling of the coolant reservoir under the Turret Lathe Machine with a mixture of 30 parts water to one part Long Life Universal Coolant. The 30-to-1 ratio of water to coolant is essentially the same ratio used during the time at issue in the present investigation.

6. On the same March 13, 1984, Baldor representatives began normal operation of the Turret Lathe, cutting end plates for electric motors. These end plates were cut from 380 secondary 3% zinc aluminum -- essentially the same type metal used during the time at issue in the present EPA investigation. The Turret Lathe Machine was operated in its normal course -- cutting end plates -- from March 13, 1984 through March 20, 1984. Mr. Ken Woodward observed the machine's operation each day during the period. At present, and during the time at issue in the instant investigation, machine cutting coolant was generally used for one week -- then replaced.
7. On March 20, 1984, Ken Woodward dipped 8 quarts of waste coolant from beneath the Turret Lathe

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Machine using 8 new quart galvanized tin containers. Mr. Woodward locked the samples of waste coolant in his office at Baldor's Corporate Headquarters in Fort Smith, Arkansas.

8. On March 21, 1984, Mr. Woodward took two 1 quart containers of the sample waste coolant from his office and delivered them to Baldor's Fort Smith Warehouse Manager, Mr. Danny Turner. (The other 6 quarts of waste coolant have been retained in a secured and controlled manner by Baldor Electric Company.)
9. Warehouse Manager Turner gave the 2 quart samples of waste coolant to Warehouse Leadman, Tim Moss, who, in turn, delivered the samples to Shipping Clerk, Ronnie Smith. Mr. Smith delivered the 2 quarts of waste coolant to Mr. Euell Jones, an independent truck driver, for transport to Baldor's St. Louis Plant -- Attention: St. Louis Operations Manager, Henry W. Endres. Mr. Jones transported the waste coolant samples on the evening of March 21, 1984, arriving early on the 22nd.
10. St. Louis Operations Manager, Henry Endres, took custody of the 2 quart samples of waste coolant on the morning of March 22, 1984 and locked them

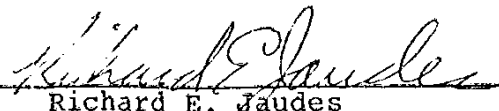
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in his file cabinet in the Company's St. Louis office.

11. On March 23, 1984, St. Louis Plant Personnel Manager, Royce Sykes, at the direction of Henry Endres, took the 2 quart samples of waste coolant and delivered them by automobile to Mr. William T. Fitzgerald at the Laclede Gas Laboratory Division, 4118 Shrewsbury, St. Louis, Missouri.
12. The Laclede Gas Company Laboratory Division issued its Laboratory Report concerning the sample waste cutting fluid on April 18, 1984.

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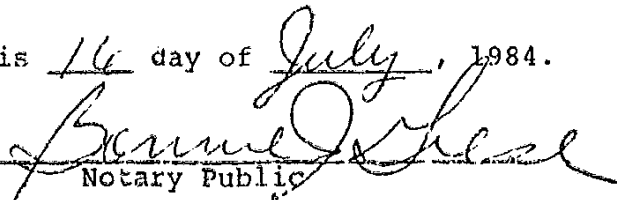
I hereby certify that the facts stated above are true and correct to the best of my knowledge, information and belief.


Richard E. Jaudes

PEPER, MARTIN, JENSEN, MAICHEL
AND HETLAGE
720 Olive Street, 24th Floor
St. Louis, Missouri 63101
(314) 421-3850

Attorneys for Baldor Electric Company

SUBSCRIBED AND SWORN TO before me this 16 day of July, 1984.


Notary Public

My Commission Expires:

BONNIE J. GIESE
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES MAR. 1, 1988
JEFFERSON COUNTY

BEFORE THE
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
DALLAS, TEXAS

TOXICITY OF STARTING MATERIALS

I have examined the components of Long-Life Universal Coolant, as specified in the letter of January 17, 1984 from Mr. C. Richard Stolley of Certified Laboratories to Mr. Ken Woodward of Baldor Electric.

Of the named components, only caustic soda (sodium hydroxide) appears on any federal list of hazardous materials. However, since the coolant also contains borax (sodium borate) and the pH of the concentrate is 9.4 to 9.8 (manufacturer's specification), I conclude that the principal inorganic species in the formulation are sodium ions and borate ions. Hydroxyl ion concentration is well within the nonhazardous range, as defined by the Resource Conservation and Recovery Act (RCRA) regulations, and sodium hydroxide as such does not exist in the formulation.

The named organic species (triethanolamine, ethoxylated tallow amine, azelaic acid and benzotriazole) in Long-Life Universal Coolant do not appear on the lists of toxic or hazardous chemicals in the RCRA, Toxic Substance Control Act or the Federal Water Pollution Control Act regulations.

It is my professional opinion that under all existing statutes these species are nontoxic and that Certified Laboratories Universal Long-Life Coolant is not a hazardous material.

It is also my professional opinion that the A.W. Hydraulic 68 Oil used in the Baldor metal working machines and the metals processed by these machines are nontoxic materials.

HAZARD STATUS OF WASTE COOLANT

I have examined the report by the Laclede Gas Company Laboratory Division, dated April 18, 1984, of the analysis performed on diluted Long-Life Universal Coolant actually run in a Baldor metal working machine (as described in the accompanying "Verified Procedure and Custody of Waste Test Samples").

The report indicates that this waste coolant does not have the RCRA characteristic of EP toxicity since it contained no extractable metal ion in a concentration above the prescribed limits. It does not have the RCRA characteristic of ignitability since its flash point is above the prescribed limit. It does not have the RCRA characteristic of corrosivity because its pH is within the prescribed range for noncorrosivity. It does not have the RCRA characteristic of reactivity since it did not react with water or upon heating and did not produce hydrogen cyanide or hydrogen sulfide.

This waste does not appear on the lists of hazardous wastes from specific or nonspecific sources; it is not a discarded commercial chemical product, manufacturing chemical intermediate or off-specification species.

It is my professional opinion that the waste coolant described in the Laclede Gas Company Laboratory Division report does not meet any definition of a hazardous waste under RCRA and is therefore a nonhazardous waste.

Joseph Eigner

Joseph Eigner, Ph.D.
President
Joseph Eigner & Co., Inc.
Environmental Consultants

003572



LABORATORIES SOLUTIONS ARE OUR BUSINESS

January 17, 1984

Mr. Ken Woodward
Baldor Electric
Wheeler and O Street
Fort Smith, Arkansas 72901

Dear Mr. Woodward:

I received your request for the breakdown of our product, LONG-LIFE UNIVERSAL COOLANT. We do not usually give percentages; however, I will give them to you in this instance in a range. I trust that you will hold this information to be proprietary.

The ingredients of CHEM-COOL 1 are as follows: water (50-60%), triethanolamine (20-25%), ethoxylated tallow amine (1-5%), azelaic acid (5-10%), borax (1-5%), benzotriazole (less than 1%), caustic soda (1-5%), fragrance (less than 1%), and color (less than 1%).

We trust the above information to be correct. If you have further questions or require additional information, please do not hesitate to contact me at extension 0670.

Sincerely,

CERTIFIED LABORATORIES

C. Richard Stolley
C. Richard Stolley
Technical Service Chemist

103573

- P O Box 2493 Fort Worth, Texas 76101
- P O Box 5, Mountain View, Calif. 94040
- 8383 Wilshire Blvd., Beverly Hills, Calif. 90211
- P O Box 26909 Indianapolis, Indiana 46226
- Division of NCH Corporation

REPLY TO

- 1775 The Exchange, Suite 305, Atlanta, Ga. 30339
- 1350 E Touhy Ave., Suite 170W, Des Plaines, Ill. 60016
- Division of NCH Corporation

- P O Box 5006 Kendall Park, N.J. 08824
- P O Box 731 Paramus, N.J. 07652
- Division of NCH Corporation of N.J.

Exhibit 3

LACLEDE GAS COMPANY

Laboratory Division

4118 SHREWSBURY
ST. LOUIS, MISSOURI 63119
(314) 644-8577

April 18, 1984

Baldor Electric Co.
Attn: Mr. Charles Eubanks
3560 Scarlet Oak Blvd.
St. Louis, Mo. 63122

Dear Mr. Eubanks:

On March 23, 1984 a waste was received for laboratory analysis. This sample was examined for the following: ignitability, corrosivity, reactivity and EP toxicity. Methods for analysis were taken from the Federal Register 40 CFR part 261 "Methods for the Identification of Hazardous Wastes."

The test results are as follows:

<u>TEST PARAMETER</u>		<u>RESULTS</u>
Arsenic	mg/l	0.030
Barium	"	*0.4
Cadmium	"	*0.03
Chromium	"	*0.1
Lead	"	*0.1
Mercury	"	0.0030
Selenium	"	0.045
Silver	"	*0.06
Solids	%	2.5
Volatiles 100°C	"	97.5
" 600°C	"	99.85
Flash point (closed cup)	°F	above 140

to continue

CHEMICAL ANALYSIS - CONSULTING - ENVIRONMENTAL STUDIES

Exhibit A

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Mr. Charles Eubanks
Page 2

<u>TEST PARAMETER</u>		<u>RESULTS</u>
Total cyanide	mg/l	*0.02
Oil & grease	"	581.5
pH	units	9.2
Reactivity data:		
Reaction 125°C @ 5 min.		no reaction
H2S(g)	ppm	*5.0
HCN(g)	"	*5.0
Reaction to H2O		none

If there are any questions, please feel free to call.

*less than

Sincerely,

William T. Fitzgerald
William T. Fitzgerald

WTF:eb

cc: Eigner & Co., Inc.
Dr. Jos. Eigner
6802 Waterman Ave.
St. Louis, Mo. 63130

103575



DeSoto, Inc.

ADMINISTRATIVE AND RESEARCH CENTER
1700 SOUTH MOUNT PROSPECT ROAD, DES PLAINES, ILLINOIS 60018 TELEPHONE 312-391-9000

RECEIVED
REGION VI

1984 JUL 16 AM 10:46

OFFICE AND BRANCH

LAW DEPARTMENT

July 10, 1984

Douglas O. Smith
Warner & Smith
P. O. Box 1626
Ft. Smith, AR 72902

Re: Industrial Waste Control Site
Ft. Smith, Arkansas

Dear Doug:

DeSoto is one of the companies which used the IWC site to dispose of its waste materials during the operation of the Ft. Smith furniture facilities. Many of the other companies in Ft. Smith, such as Baldor, Rheem and Whirlpool, also used the site. We have met with the USEPA in Dallas and are attempting to form a group of generators to work with the EPA in studying the site and formulating an acceptable remedial plan.

To that end, we have written to all known users at the site. A copy of that letter is enclosed. We were unable to locate three entities, formerly located in Ft. Smith, to send them this communication. I am enclosing their copies of the letter. May we enlist your help in locating these folks? If necessary, a "skip-tracer" could be used or perhaps one of your more energetic summer clerks. Any information you could supply on these folks would be appreciated.

If you do obtain new addresses, please send the enclosed letters to them and advise us of their new location. If they cannot be located, please inform us of that so we may contact USEPA. I trust this request can be accomplished in accord with your other more pressing concerns and thank you in advance for your help.

Sincerely,

W. J. Fitzpatrick
Assistant Corporate Counsel

WJF:cr

cc: K. A. Walanski
A. L. Gardner, USEPA ✓

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DeSoto, Inc.

ADMINISTRATIVE AND RESEARCH CENTER

1700 SOUTH MOUNT PROSPECT ROAD, DES PLAINES, ILLINOIS 60018 TELEPHONE 312-391-9000

LAW DEPARTMENT

July 2, 1984

TO: Industrial Waste Control (IWC)
Superfund Site Participants

Your company has been identified as a Potential Responsible Party (PRP) at the IWC site near Ft. Smith, Arkansas. Some of you have already been in contact with USEPA, Region VI, Dallas and most have received and responded to the EPA's Section 104 CERCLA request (42 U.S.C. 9604(e)(1)). Representatives of DeSoto, Inc. met with USEPA Region VI on June 27, 1984.

The EPA has authorized an initial expenditure of approximately \$610,000.00 for a subsurface/groundwater study (RI/FS). This work is currently being performed by the EPA zone contractor, CH2M Hill and their subcontractors, including Ecology & the Environment. These anticipated costs do not include laboratory analytical work necessary to identify and quantify the alleged contaminants in the subsurface or which may be leaking from the site clay caps in extreme wet weather conditions. The phased approach adopted by EPA at this Site is approaching a milestone. EPA expects the initial report from the RI/FS contractor to be available by September 1, 1984.

USEPA will seek reimbursement for these expenses, along with future expenses incurred at the Site, from generators, haulers, owners and others who may be deemed liable under CERCLA. The subsurface contractor's report expected by September 1, will contain findings, data, conclusions and recommendations as to further study or initial remedial actions. These actions may involve the expenditure of considerable sums of money in the identification of further problems at the Site or addressing alleged environmental threats.

It would appear prudent, to actively participate in the further development of the data base for this Site and to be included in the process of developing findings, conclusions and recommendations as to further study and future remedial efforts. This can only be accomplished through a coordinated approach to USEPA using our combined technical and other expertise, and the benefit of pooled resources. Additionally, it would appear essential, that a coordinated effort be made now, to identify all potential site participants, secure their involvement in voluntary efforts designed to coordinate with EPA toward feasible remedial

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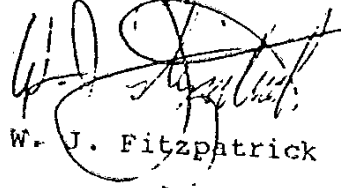


DeSoto, Inc.

actions at the Site. Review and funding mechanisms on our part should be established now so as to minimize our review time for EPA contractor-generated documents and recommendations and maximize group effort toward voluntary remedial action.

To this end, we solicit your participation in an initial organizational effort in the form of a meeting to be held the week of July 23-26 in Ft. Smith, Arkansas, or such other times or location as may be more convenient. Please call me as soon as possible at 312-391-9603 or write me at the above address to indicate your participation and to finalize the details of our first meeting. A tentative agenda is enclosed. Please supply additions or suggestions.

Sincerely,



W. J. Fitzpatrick

WJF:cr

Enclosure

Sent to the following entities:

- \ Baldor Electric
- \ Ball Plastics
- \ Champ Hinton Pontiac
- \ Crain Industries
- \ Dale Crampton Co.
- \ Fort Smith Barrel & Drum
- \ General Electric Co.
- \ General Tire & Rubber Co.
- \ Georgia Pacific Corp.
- \ Gould Battery
- \ Industrial Roofing & Sheet Metal Co.
- \ Industrial Roofing & Sheet
- \ Manhattan Construction Co.
- \ Motive Parts Warehouse
- \ Parker Solvents Co.
- \ Plastic Research & Development
- \ Rheem Mfg. Co.
- \ St. Edward Mercy Medical Center
- \ Southwest Glass Co.
- \ Southwest Rebuilders
- \ Whirlpool Corp.

Out of business

003578

TENTATIVE AGENDA

Identification of all Potential Responsible Parties

Involvement of site owners, operators, haulers,
insurers

Review of all available documents

Use of outside consultants (geologists, hydrologists,
chemists)

Liason with USEPA

Administrative Fund formation

003579

PEPER, MARTIN, JENSEN, MAICHEL AND HETLAGE

ATTORNEYS AT LAW

WESTE FOURTH FLOOR

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ST. LOUIS, MISSOURI 63101

JOHN P. H. JOHNSON 19850

TELEX: 484267

David P.
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Er. Corleap

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WASHINGTON, D.C. 20006
(202) 628-4949

SUITE 205

1375 JACKSON STREET
FORT MYERS, FLORIDA 33901
(813) 837-8850

200 N. WOOD RIVER AVENUE

WOOD RIVER, ILLINOIS 62006
(618) 251-4988

June 4, 1984

Mr. Samuel L. Nott
United States Environmental
Protection Agency, Region VI
InterFirst Two Building
1201 Elm Street
Dallas, Texas 75270

Re: Industrial Waste Control Site
Fort Smith, Arkansas
Baldor Electric Company

Dear Mr. Nott:

This letter will acknowledge our meeting with you and Ms. Pamela Phillips on Friday, June 1, 1984, regarding my client, Baldor Electric Company, and the EPA's investigation of the Industrial Waste Control Site near Fort Smith, Arkansas.

As stated at our June 1 meeting, it is the position of Baldor Electric Company that it did not dispose of any hazardous substance or waste, as defined under Environmental Laws at the Industrial Waste Control Site. Thus, Baldor is not liable for any investigative or cleanup costs regarding the Site.

As promised at our meeting, Baldor will present written documentation supporting its position that it did not dispose of hazardous substances or waste at the Industrial Waste Control Site. I intend to have our documentation package to you before July 15, 1984.

003500

PEPER, MARTIN, JENSEN, MAICHEL AND HETLAGE

Page Two
June 4, 1984
Mr. Samuel L. Nott

If you have any questions regarding Baldor Electric Company, or the Industrial Waste Control Site investigation, please contact me.

Sincerely,



Richard E. Jaudes

REJ:jks

cc: Mr. David Price
Mr. R. S. Boreham, Jr.
Mr. William T. Kirkpatrick
Mr. William O. Parris
Mr. Orville Dodson
Mr. Kenneth G. Woodward
Joseph Eigner, Ph.D.

003581

YOU CAN BUY ON



LABORATORIES

SOLUTIONS ARE OUR BUSINESS

January 17, 1984

Mr. Ken Woodward
Baldor Electric
Wheeler and O Street
Fort Smith, Arkansas 72901

Dear Mr. Woodward:

I received your request for the breakdown of our product, LONG-LIFE UNIVERSAL COOLANT. We do not usually give percentages; however, I will give them to you in this instance in a range. I trust that you will hold this information to be proprietary.

The ingredients of CHEM-COOL 1 are as follows: water (50-60%), triethanolamine (20-25%), ethoxylated tallow amine (1-5%), azelaic acid (5-10%), borax (1-5%), benzotriazole (less than 1%), caustic soda (1-5%), fragrance (less than 1%), and color (less than 1%).

We trust the above information to be correct. If you have further questions or require additional information, please do not hesitate to contact me at extension 0670.

Sincerely,

CERTIFIED LABORATORIES

C. Richard Stolley
Technical Service Chemist

205500

- P O Box 2493, Fort Worth, Texas 76101
- P O Box 5, Mountain View Calif 94040
- 8383 Wilshire Blvd, Beverly Hills Calif 90211
- P O Box 26909 Indianapolis, Indiana 46226
- Division of NCH Corporation

REPLY TO

- 1775 The Exchange, Suite 305, Atlanta, Ga 30339
- 1350 E Touhy Ave, Suite 170W, Des Plaines Ill 60016
- Division of NCH Corporation

- P O Box 5006, Kendall Park NJ 088
- P O Box 731 Paramus NJ 07652
- Division of NCH Corporation of