United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Tuesday, April 15, 2008
From: Anita Boseman

To: C. Gebien, U.S. EPA, SFD
T. Branigan, U.S. EPA, ORC
C. Allen, U.S. EPA, OPA

Subject: Initial POLREP
Ken's Metal Finishing
2333 Emerson Avenue, North, Minneapolis, MN
Latitude: 45.0031000
Longitude: -93.2942000

POLREP No.:	1	**Site #:**	B5NJ
Reporting Period:	April 1-12, 2008	**D.O. #:**	0102
Start Date:	4/1/2008	**Response Authority:**	CERCLA
Mob Date:	4/8/2008	**Response Type:**	Emergency
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:	MND 000 510 284	**Contract #**	68-S5-03-06
RCRIS ID #:			

Site Description

Ken's Metal Finishing (KMF) Site is located at 2333 Emerson Avenue North in Minneapolis, Hennepin County, Minnesota. The Site is a former metal electroplating and polishing facility that began operation 1978 in northern Minneapolis. The Site is located in a residential neighborhood with approximately eleven residential properties within 200 feet (ft) of KMF. A crisis & childcare center is located to the southeast; a public school & park is located to the west; and a public elementary school is located approximately 700 ft to the west of the Site. At least four churches and one park are within a 1,000 ft radius of the Site.

A Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection Report completed on June 15, 2006 documented accumulation, improper storage and management of solid and liquid industrial waste; and poor structural integrity of the facility, including a damaged, leaking roof.

On March 14, 2008, Steve Kennedy with the City of Minneapolis, Chief Fruetel of Minneapolis Fire Department and a building inspector assessed the scene at the facility.

On March 17, 2008, the City of Minneapolis through Minnesota Pollution Control Agency (MPCA) requested U.S. EPA respond to releases and threatened releases of plating shop chemicals and wastes at KMF facility located in Northern Minneapolis. The operators failed a number of opportunities and demands to comply with the county, state, and federal waste regulatory programs. The condition of the containers and the building makes the current conditions unsafe for the neighborhood.

On March 19, 2008, the owner signed an consent to access the property to perform a site assessment.

On March 19-20, 2008, U.S. Environmental Protection Agency (U.S. EPA) On-Scene Coordinator (OSC) Anita Boseman, Superfund Technical Assessment and Response Team (START), Weston Solutions, Inc. (WESTON) and their subcontractor, Bay West Inc., met with the property owner to conduct a site assessment of the facility. START documented the conditions at the Site to evaluate the potential threats to human health and the environment posed by the Site. Over 180 containers (i.e. drums, small containers, tanks and vats) of metal processing materials and waste were inventoried and sampled to determine the quantity and type of waste located at the site.

The Site was characterized by uncontrolled access; miscellaneous containers of corrosive, toxic, and flammable materials including oxidizers, solutions and solids with cyanide, acids and caustics; questionable integrity of building structures; and identified waste storage violations, all of which pose an imminent and substantial threat to human health and the environment.

Based on the information gathered during the site assessment, U.S. EPA implemented an emergency removal action to address the Site hazards and to mitigate the imminent and substantial endangerment posed to human health and the environment.

Current Activities

On March 31, 2008, the owner signed another consent to access the property to perform an emergency removal action.

On April 1, 2008, OSC Boseman, Environmental Quality Management (EQM) Environmental Rapid Response Services (ERRS) and WESTON START conducted a site walk of the facility to assess site security issues and waste removal strategies. The following removal activities were discussed:

- Address site security issues including erecting site security fence and changing door locks;
- Conduct pre-removal environmental sampling to evaluate the extent (if any) of contamination to the facility structure;
- Conduct hazard characterization testing (hazcating) of the 180 containers of unknown solid and liquid chemicals (START WESTON) for the purpose of determining waste streams for final waste disposal;
- Create a bulk/composite sample of each compatible waste stream for disposal analysis to an ERRS-procured laboratory;
- Segregate and properly dispose of hazardous and non-hazardous waste streams;
- Possible decontamination and dismantling of process equipment and associated piping;
- START to conduct indoor and outdoor perimeter air monitoring throughout the removal process for nuisance dust and particulates, hydrogen cyanide and atmospheric conditions.
- Site removal activities would begin tentatively on April 14, 2008.

On April 2 through 11, 2008, START-WESTON, sub-contractors Bay West, Inc personnel conducted daily site inspection of the facility.

On April 8, 2008, ERRS Response Manager (RM) and one foreman mobilized to KMF.

From April 9-11, 2008, ERRS conducted site preparation including installation of two site trailers, connection of temporary electrical utilities (generator), staging of sanitary utilities and erecting a chain link fence around the western end of the site (parking lot) for security purposes; site preparation was documented by START-Bay West.

- Based on conclusions from the walk through, START created an Air Monitoring, Sampling and Analysis Plan to describe site-specific tasks that will be performed in support of the air monitoring, dust/particulate, suspected asbestos containing material (ACM) and wipe sampling; identify data collection activities and associated quality assurance/quality control (QA/QC) measures specific to KMF.

Starting April 9, 2008, security was on-site during non-working hours.

Planned Removal Actions

- Evaluate facility structural integrity to mitigate incidents during removal activities and set-up site work zones;
- Conduct pre-removal environmental sampling to evaluate the extent (if any) of contamination to the facility structure including dust/particulate, suspect ACM, and wipe sampling;
- Evaluate and prepare site for indoor and outdoor perimeter air monitoring including setup of air monitoring stations; air monitoring will be for nuisance dust and particulates, hydrogen cyanide (HCN) and atmospheric conditions using personal data Rams (PDRs), AreaRaes with HCN sensors, ToxiRae II hydrogen cyanide meter, and a MultiRae.
- Sample the 180 containers of unknown solid and liquid chemicals and conduct hazard characterization testing (hazcating)for the purpose of determining waste streams for final waste disposal;
- Hazcating activities may occur outside the facility within the site boundary. However, if weather conditions are not favorable for outdoor hazcating, START will perform the task in an area inside the facility with sufficient air flow;
- Document hazcating results in U.S. EPA's Emergency Response Team (ERT) DrumTrak data management database.

Next Steps

- Connection of permanent electrical utilities to site trailers and the building in order to conduct site removal operations;
- On-site mobilization of START Bay West personnel and remaining ERRS crew;
- ERRS will continue mobilization of equipment and supplies prior to the start of site activities.

Key Issues

• Connection of site and facility electrical utilities within the next week to begin pre-removal activities;
• Hazcating activities may occur outside the facility within the site boundary. However, if weather conditions are not favorable for outdoor hazcating, START will need to perform the task in an area inside the facility with sufficient air flow.

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