United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Tuesday, May 6, 2008
From: Anita Boseman

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

Subject: On-going Emergency Removal Action
Ken's Metal Finishing
2333 Emerson Avenue, North, Minneapolis, MN
Latitude: 45.0031000
Longitude: -93.2942000

POLREP No.:	3	**Site #:**	B5NJ
Reporting Period:	4/27/08 to 5/2/08	**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
The detailed site description can be found in POLREP #1.

Current Activities
On April 28, 2008, U.S. EPA's START contractor calibrated and setup Area-RAE and pDR instruments for indoor and perimeter air monitoring. All readings for Area-RAE monitoring, including H2S, HCN, VOC and LEL were below Action Levels. O2 levels were between 20.8% and 21.0%. pDR dust concentrations were below nuisance levels for all locations.

HazCat analysis was completed on the remaining 17 drums for a total of 151 containers tested. Containers were segregated into appropriate hazard classes for consolidation. Vats were prepared for removal of contents and dismantlement. Security was on site from 1730-0700 the following day.

On April 29, 2008, Area-Rae and pDR units were setup at the same locations. No change in concentration levels from the previous day. START used Level C PPE to test bulk waste streams to determine compatibility. These included:

•Cyanide Solids
•Cyanide Liquids
•Acid Liquids
•Acid Solids
•Base Liquids
•Base Solids
•Flammable Liquids

Five containers of base solids were bulked into one cubic yard box. The vats continued to be prepared for large quantity consolidation. Liquid and solid acid drums were staged to facilitate efficient removal from building. Security was on site from 1730-0700 the following day.

On April 30, 2008, monitoring equipment, Area-Rae and pDR units were setup at the same locations. No change in concentration levels from the previous day. START donned Level C PPE to complete test bulking on neutral solids and neutral liquids. Asbestos samples are delivered to EMSL Analytical, Inc. in Plymouth, Minnesota for analysis. Additional samples from containers were collected. Eight composite samples were prepared for waste characterization. Sample parameters included:

•pH
•Total RCRA Metals
•Total Cyanides
•TCLP Volatile Organic Compounds
•TCLP Semi-Volatile Organic Compounds
•Amenable Cyanides

The forklift was delivered for material handling. Acid solids were bulked into one 55-gallon drum. Bulking of base solids into cubic yard box continued. small-container base liquids and neutral liquids were consolidated into separate empty vats for future transfer into a tanker truck, if possible. A containment pad was constructed for staging full 275-gallon totes. U.S. EPA received confirmation that the drum with contaminated wood which was present during the RCRA CEI on June 15, 2006, is inside the building. It will will be disposed of as hazardous waste. Security was on site from 1730-0700 the following day.

On May 1, 2008, Area-Rae and pDR units were setup at the same locations. No change in concentration levels from the previous day. A total of 106 containers located in the Finishing Room were inventoried for lab-packing. Eight waste samples were submitted to TestAmerica Laboratory for analysis. A total of 380 gallons of cyanide liquids were pumped from the facility into two, 275-gallon poly totes with metal-reinforced cages. Totes were placed outside in secondary containment and covered with poly sheeting. Consolidation of base liquids continued for future transfer. Security was on site from 1730-0700 the following day.

On May 2, 2008, heavy rain precluded the necessity for outdoor air monitoring, therefore, monitoring equipment, Area-Rae and pDR units were setup inside the facility only. All levels of contaminants were below Action Levels. A total of 750 gallons of acid liquids were transferred from the facility into three, 275-gallon poly totes with metal-reinforced cages. Totes were placed outside in secondary containment and covered with poly sheeting. OSC Boseman requested START inspect totes on May 3rd and 4th to ensure integrity of these containers stored outdoors. Security was on site from 1730 May 2 until 0700 May 5.

Planned Removal Actions

•Evaluate suspected asbestos containing material (SACM) samples to determine possible removal.
•Safely remove waste from building using overpack drums, cubic yard boxes and totes.
•Pump hazardous liquids from facility using pumps and a tanker truck.
•Perform air monitoring during all indoor and outdoor activities.

Next Steps

•Maintain air monitoring during all indoor and outdoor activities.
•Procure contractor to complete lab-packing on 106 identified containers.
•Profile waste streams for disposal.
•Mobilize tanker truck to transfer waste neutral liquids and possibly cyanide liquids for disposal.
•Deliver roll-off container for hazardous waste debris.
•Dismantle vats and drums for waste disposal.

Key Issues

•Maintain site security with after-hours security firm.
•Ensure safe waste transfers using proper techniques.
•Keep outdoor containers on containment pad and wrapped in poly sheeting to maintain vessel integrity.

response.epa.gov/KensMetalFinishing