

**United States Environmental Protection Agency
Region V
POLLUTION REPORT**

Date: Friday, May 16, 2008

From: Anita Boseman

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

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

POLREP No.:	5	Site #:	B5NJ
Reporting Period:	5/10/2008-5/16/2008	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

The detailed site description can be found in POLREP #1.

Current Activities

On May 12, 2008, Area-RAE and pDR instruments were calibrated and setup at 4 different site locations 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%. pDR dust concentrations were below nuisance levels for all locations.

Preliminary analytical results were received from TestAmerica Laboratories on waste characterization samples submitted 5/1/2008. See the "Analytical Results for Waste Characterization of Composite Samples" document for details. Waste previously labeled as neutral liquids are now classified as heavy metal liquids. Four 55-gallon drums of CN solid waste were containerized and 550 gallons of CN liquids were transferred to poly totes staged outside on secondary containment pads. Empty vats continued to be cut into three-foot by three-foot pieces required for disposal. Security was on site from 1730-0700 the following day.

On May 13, 2008, Area-RAE and pDR instruments were calibrated and setup at 4 identified site locations 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%. pDR dust concentrations were below nuisance levels for all locations. A 20 cubic yard roll-off container was delivered and lined with a 6-mil poly liner. RCRA empty, non-hazardous drums, waste PPE and debris were placed into the roll-off for disposal. Six 55-gallon drums of CN solid waste were containerized. Vats continued to be cut into three-foot by three-foot section for disposal. Security was on site from 1730-0700 the following day.

On May 14, 2008, Area-RAE and pDR instruments were calibrated and setup at 4 identified site locations 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%.

A Multi-RAE PID was utilized in the Exclusion Zone(EZ) for CO monitoring while a gasoline-powered saw was in operation. CO measurements with the Multi-RAE PID indicated intermittent levels between 20-50ppm. Operations stopped and the EZ ventilated before crews were allowed to re-enter. pDR dust concentrations were below nuisance levels for all locations.

Vats continued to be cut into three-foot by three-foot sections for disposal. The 20 cubic yard roll-off was filled with RCRA empty, non-hazardous drums, waste PPE and debris. Allied Waste of Eden Prairie,

Minnesota transferred the waste to Pine Bend Landfill in Inver Grove Heights, Minnesota. Four 55-gallon drums of CN solids were containerized. The remaining 50 gallons of CN liquids were pumped into 275-gallon poly totes. Security was on site from 1730-0700 the following day.

On May 15, 2008, Area-RAE and pDR instruments were calibrated and deployed to the 4 site locations 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%. The pDR dust concentrations were below nuisance levels for all locations. A Multi-RAE PID was utilized in the EZ for CO monitoring while operating gasoline-powered saw. CO levels were elevated during short time periods, prompting work in the EZ to stop until levels dropped to 0-5ppm.

Vats continued to be cut into three-foot by three-foot sections for disposal. About 100 gallons of acidic residue were scraped from the Main Plating Room floor. One additional drum of CN solids was containerized. Security was on site from 1730-0700 the following day.

On May 16, 2008, Area-RAE and pDR instruments were calibrated and positioned to the 4 site locations for indoor and perimeter air monitoring. A Multi-RAE PID was utilized in the Exclusion Zone (EZ) for CO 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%. CO levels were 0ppm. pDR dust concentrations were below nuisance levels for all locations.

An inventory was conducted of waste containers in the facility. See waste stream summary for details. Vats located in the Main Plating Room continued to be cut into three-foot by three-foot sections. PVC piping from the Basement and Main Plating Room was dismantled and staged for disposal.

A plastic tarp was placed over all outdoor poly totes for protection from the elements. Security was on site from 1400 05/16/08 through 0700 05/19/08.

Planned Removal Actions

- Safely remove remaining CN solid waste from building.
- Pump remaining heavy metal liquids (originally neutral liquids) from facility using a tanker truck.
- Maintain air monitoring during all indoor and outdoor activities.
- Remove cut apart vats from facility for disposal in hazardous waste roll-off box.
- Lab-pack 106 containers for disposal.

Next Steps

- Procure contractor to complete lab-packing of 106 identified containers.
- Arrange for transfer and disposal of generated waste.
- Deliver roll-off container for hazardous waste debris.

Key Issues

- Maintain site security during non-working hours.
- Ensure safe waste transfers using proper techniques due to close public proximity.
- Keep outdoor containers on containment pad and wrapped in plastic sheeting.
- Maintain proper ventilation in facility while operating CO producing equipment.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
Acid Liquids	750 Gallons		PSC Environmental; Detroit, MI
Acid Solids	330 Gallons		PSC Environmental; Detroit, MI
Base Solids	2 Cubic Yard Boxes		PSC Environmental; Detroit, MI
Cyanide Solids	1,430 Gallons (Twenty six, 55 gal. drums)		PSC Environmental; Detroit, MI
Cyanide Liquids	1,025 Gallons (Four, 275 gal. totes)		PSC Environmental; Detroit, MI
Heavy Metal Liquids (previously Neutral	2,500 Gallons, (one		EQ; Belleville, MI

Liquids)	tanker truck)		
Lab-Pack Small Quantity Containers(flammables,solvents,chemicals)	UNKNOWN		PSC Environmental; Detroit, MI
RCRA Empty Containers, Solid Waste	20 Cubic Yards (One roll-off box)	NH-01	Pine Bend Landfill; Inver Grove Heights, MN
Hazardous Waste Debris	40 Cubic Yards, (2 roll-off boxes)		EQ; Belleville, MI

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