ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

INDEX

Franklin Manufacturing Co

St. Cloud, MN 55101

Visual Site Inspection

Note book

10/15/[illegible]
10:15 am
Recorded
by: Br[illegible] Ross
PRA

[illegible] Meeting
at MPCA

[illegible] Kjute-Franklin Lane
Deline [illegible] - White
[illegible] - MPCA
Ka[illegible] - MPCA
George Johnson 4-MPCA
Steve ~~[illegible]~~ 4-PACE
Vanderboom
BAR

[illegible] Marcus
Discussed [illegible]:
[illegible]

based [illegible]

#1 [illegible]
Bring
[illegible]
[illegible]

#2 [illegible] Test for [illegible] ~~[illegible]~~
PACE [illegible] Oct. 16, '9[illegible]

#3 [illegible] Chromium test
Sept [illegible] 74

On Borings for [illegible] Expansion

18" to 24" deep.

- in this report, [illegible] no [illegible] done

#4. stockpile of material
letter from St [illegible] Cardill

#5 MPCA [illegible] approving
disposal of settling pond
material

#6. Note card on impoundment
Mr. Marcus [illegible] [illegible]
have [illegible] copy

#7 Two complaints [illegible] in
1/8", mentioning "landfill"

They want to see information.

Mr. Marcus interviewed
employees on 15/4/85
at Franklin

He found no [illegible] of a
landfill at Franklin

Mr Marcus states:
Only ~~[illegible]~~ evidence of a landfill is
the [illegible] response a typo

demolition Debr. → [illegible]
constituent [illegible]

He reiterates that No [illegible]
[illegible] He interviewed people
[illegible] had been at Franklin 35 years.
1946 – Franklin [illegible] the site
and began [illegible]

Keown states that incinerator [illegible]
was store [illegible] site.
Mr Clate: Dean the years
solvent carried out by ~~[illegible]~~ Phillips System RAR

#8 Preliminary [illegible] MPCA
- Follow up [illegible]
G.W. Contamination Report.
- They [illegible]

#9. [illegible]
Should only [illegible]
surface [illegible]
#10. [illegible] provisions

~~#11~~

Chemical analysis from PACK Lagoon is the only analysis they have.

- Mr. Marcus did provide more analysis

- Lagoon only received the paint and phosphatizer. Did not recieve any barrels of solvents, etc.

Up to 1973 - the barreled wastes went to St. Augusta Landfill. Franklin [illegible] in RP

- ~~They~~ Mr. Clute states that there was a program in place to handle wastes. They had final policies.

- Amount removed from lagoon was an average of two feet from calculations Mr. Marcus made

Take depth [illegible] excavated to [illegible] the depth of Cr analysis found contamination

- They feel they removed the contamination [illegible], they state they have a clean lagoon.

- 5ppm on [illegible]

- Franklin tested [illegible] water of [illegible] of employees done 1979

Cr
Hardness
Mg
COD

- employees lived [illegible]
- They evidently have some info on GW flow

Kevin Veach —
Cr contaminated soil not a hazardous MPCA realizes that Cr^{+3} is immobile.

[illegible] release to the environment has occur (i.e. Cr).

Mr. Marcus:

- They have no objections to the VSI, looking at the files, getting additional information.

- They want insurance on myself who I come on the site. They want to see an insurance certificate.

⇒ Other information available:
- [illegible] of [illegible] (provided)
- [illegible] of [illegible] (provided)
- [illegible] Flow (will provide)
-

[illegible] - Waste Reserves [illegible] Wisconsin
- Files - waste [illegible]

- should look at supervised for St. Augusta Landfill
can have all available [illegible]
- Franklin has

C[illegible] meeting at 11:50 am

11/[illegible]/86

Recorded by Brian A. R[illegible]
Franklin USI Pope B[illegible] Associates

Arrive at Franklin Lobby at 10:20

Meet w/ Dick Clute and proceeded to the conference room.

10:45 Discussion w/ Mr Clute

In Attendance: D. L. Clute ~~[illegible]~~ BAR (Franklin)

George John[illegible] MPCA
Dawn Horsted Pope-Reed
Kevin Veach MPCA

Explained the RFA process to Mr. Clute

- Mr. Clute had questions about if the RFA process would release Franklin from past processes.

I responded that the RFA process is designed to identify and force facilities to cleanup past releases.

Franklin originally came into the system because of Fool and System Residuals

EPA delisted this waste as a group.

When ~~[illegible]~~ BAR the waste became delisted, Franklin withdrew their Part A notification

The facility still has wastes store for over 90 days.

They are trying to get rid of their wastes of BAR ~~[illegible]~~ isocyanate

- Sent 3 5 gallon containers to Rollins in Baton Rouge, LA this summer; now they have to repackage the wastes. ~~The~~ BAR Rollins may not even take it then.

They are looking at other alternatives, for ~~[illegible]~~ BAR solvent disposal especially.

MDI is the isocyanate that they use.
From filter cleaning, drain lines, etc.

We begin discussing the attachment to USI notification letter at 11:15

They have known common knowledge of ground water flow in the area. It is generally to the NE.

He is not sure how many private ~~[illegible]~~ wells just north of 8th Street. Probably several very shallow (sand point) wells.

Fate of Empty Product Drums

75% { - Some are returned to vendor
- sell some drums
- sell some for scrap metal
- some collect waste
- Thermomastic material drums are sold for scrap

most solvent drums

⇒ Handling methods for wastes

- solvents - up to 1973 - hauled to St. Augusta LF.
- at 1973 Midway Iron took solvents and fed through their incinerator till 1979. Solvents then went to Waste Reclaim in Eau Claire Wis.

- Resins - up to '73 - St Augusta LF
  Midway Iron incinerated then till 1980. - BPR
  In 1980 started sending resins to LDI in Michigan
  In '81 - Indiana Jones Chem.
  Quite shipping till '85
  '85 started using Rollins

- Incinerator Ash - to St Augusta LF (from to 1980 a lead-based paint was used) till 1981

Waste lube Oils - are stored in non-flammable storage area

PCB containing transformers were stored in warehouse ~~EM~~ BAR

- These transformers ~~were~~ BAR went out in 1978 were shipped in 3 months

12 PCB capacitors - out of service stored them in transformer vaults

- Clean-up / maintenance waste If hazardous are treated as hazardous and shipped offsite

- Mineral Spirits - ad

- Photo Stripper Solids - not generated anymore, but was sent to LA The lines were cleaned with ~~ASK~~ BAR methylene chloride

Ammonium hydroxide - mixed with sawdust and used to neutralize

BAR isocyantes → not use any more. Know used Tergetal™ to neutralize isocynate
- ammonia hydroxide 10 gals was sent offsite

- Disturbed area south of the Former Lagoon -
Mr. Clute provided a 1970 photo that showed the the disturbed area BAR was a gravel parking lot

Broke for Lunch at 12:10

Returned at 1:20 and began discussion

Flammable Hazadous Waste Container Storage Area
A room in the paint system wastes are removed to recieving dock for shipment

1972 - BAR First began storing wastes BAR there

Officially designated as a HW area in 1980.

Non-Flammable Hazardous Waste Storage Area.
Roped off storage area inside

They determine Flammable and Non-Flammable wastes ~~are determined by~~ BR by DOT standards

Former Wastewater Lagoon

Wastewaters from paint system #4 and discharge from Binderite System Clute states that they "Never detected solvents in wastewater from the paint booth"
~~However th~~ BAR
I asked him if he could provide the data to back this up.

He provided analysis of the Paint Sludge which indicated <0.1% solvents

He also provided analysis of waste water from Bonderite Storage Line #4 having data on chlorinated solvents that showed 5.2 ppb MED and detected Trichloro fluoromethane, Chloroform Bromodichloromethane, ~~TCE~~ BAR Toluene, Tetrachloroethane, and Tetrachloroethylene at ppb level.

The above analysis probably did not contain an appreciable amount of wastewater from the Paint Booth.

Blu-Surf Incinerator

The ash is separated out by a cheese cloth filter

Ash is store next to incinerator

Process Sewers

Probably put in when the Paint System building was built in 1953

Probably clay tile of 8 to 10 inch thickness estimated

Non-contact cooling water and #2 Bonderite system discharge to line #12 which discharges to municipal sewer line at ~~33rd~~ BAR Ave.

Waste Bonderite Storage Tanks
Doesn't really handle waste, but is part of the process of Bonderite applications

Paint Booth Wastewater Tanks
Discharge from this tank is weekly
This is a process tank that handles wastewater from paint booth over-spray.

~~Former Container~~ BAR
Drum Storage Area behind the Paint System Building.
This is for storage of empty drums

Former Hazardous Waste Material storage area
To Mr. Clute's knowledge the area was never used to store wastes.

This area was a proposed area for storage of paint sludge.

BAR storage of Midway iron incinerator ash was along the fence line behind the propane tanks

2:35 PM we begin the plant tour

Photo 1 looking west
Shows Bentonite discharge line for Bentonite System #2
Photo 2 Bentonite Storage BAR
Photos BAR 3 4 5 are of the Paint Booth #2 looking west
Photo #4 shows

the discharge line to the
[illegible] Creek

Just installed a new system to
better get the paint particles
out of the wastewater

Photo #~~8~~ 6 BAR shows the vault
for ~~PCB~~ BAR spent PCB capacitor
storage looking west

Photo #~~9~~ 7 BAR looking N
Empty Drum Storage Area

Photo #~~9~~ 8 BAR looking W these are mainly recycled drums
Empty Drum
Storage Area

Photo #~~10~~ 9 BAR looking W
Location of Incinerator, the storage
No evidence of vegetation damage

Photo #~~10~~ 10 BAR look N.
Old Wastewater Lagoon
location

Photo # 11 BAR
Tank for looking at
Plant South #4

Photo # 12 Flammable Waste
Storage Area looking South
Only solvents are stored here

Photo # 13 looking Southeast
at Flammable Waste Storage
Area

Floor drains are plugged
but can be removed
Area is surrounded by 4" curb

Photo # 14
Taken looking E Blu-Shot Incinerator

Photo #15 shows where
incinerator ash is collected.
taken looking E

Photo #16 & 17
Drums of Incinerator Ash next
Blu-Shot Incin looking south

Photo #18 drain for Bondente System #4 looking W

Photo #19 looking E at BAR warehouse ~~[illegible]~~ where wastewater Lagoon was located

Photo #20 looking E at location of Wastewater Lagoon

Photo #21 looking at [illegible] disturbed area or the construction debris landfill

Photo #22 looking E at Non-Flammable HW Storage Area waste MEK on right No containment area other than concrete floor

Photo #23 looking E into hazardous waste cage

The area is covered by a roof and area slopes to a BAR plugged floor drain

~~left the~~

Left the manufacturing area at 4:00 pm.

I Conduct a short exit interview

I told Mr. Clute that we will have to get a format from Region 5 then produce a REA report that will have conclusions and recommendations. I also said that any sampling or further investigation would have to take place next spring. He would be notified of any future work if it takes place

Clute mention they just received an NPDES permit for two outfalls –

Paint System 2
Paint System 4

They only ~~mentioned~~ BAT analyze for Cr and now have removed Cr from Chromate System

E

Left Franklin Property at 4:30

ATTACHMENT D

PHOTOGRAPH LOG