

Glossary

Damaged or Significantly Damaged Thermal System Insulation ACM

Thermal system insulation ACM on pipes, boilers, tanks, ducts, and other thermal system insulation equipment where the insulation has lost its structural integrity, or its covering, in whole or in part, is crushed, water-stained, gouged, punctured, missing, or not intact such that it is not able to contain fibers. Damage may be further illustrated by occasional punctures, gouges or other signs of physical injury to ACM; occasional water damage on the protective coverings/jackets; or exposed ACM ends or joints. Asbestos debris originating from the ACBM in question may also indicate damage (40 CFR 763.83).

Friable

When referring to material in a building means that the material, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure, and includes previously nonfriable material after such previously nonfriable material becomes damaged to the extent that when dry it may be crumbled, pulverized, or reduced to powder by hand pressure (40 CFR 763.83).

Friable Asbestos Material

Any material containing more than 1 percent asbestos by weight which, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure (40 CFR 763.121(b)).

Key Terms and Definitions for Lead Based Paint

Certified Risk Assessor

An individual who has been trained by an accredited training program, as defined by this section, and certified by U.S. EPA pursuant to 40 CFR 745.226 to conduct risk assessments. A risk assessor also samples for the presence of lead in dust and soil for the purposes of abatement clearance testing (40 CFR 745.223).

Contract for the Purchase and Sale of Residential Real Property

Any contract or agreement in which one party agrees to purchase an interest in real property on which there is situated one or more residential dwellings used or occupied, or intended to be used or occupied, in whole or in part, as the home or residence of one or more persons (40 CFR 745.103).

Deteriorated Paint

Paint that is cracking, flaking, chipping, peeling, or otherwise separating from the substrate of a building component (40 CFR 745.223).

Inspection

For LBP this means (40 CFR 745.103):

1. a surface by surface investigation to determine the presence of LBP as provided in section 302(c) of the *Lead Based Paint Poisoning and Prevention Act* (42 USC 4822)
2. the provision of a report explaining the results of the investigation.

Interim Controls

A set of measures designed to temporarily reduce human exposure or likely exposure to lead-based paint hazards, including specialized cleaning, repairs, maintenance, painting, temporary containment, ongoing monitoring of lead based paint hazards or potential hazards, and the establishment and operation of management and resident education programs (40 CFR 745.223).

Lead-Based Paint Hazard

Any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, or lead contaminated paint that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects as identified by the U.S. EPA or authorized regulatory agency pursuant to TSCA section 403 (40 CFR 745.223).

Owner

Any entity that has legal title to target housing, including but not limited to individuals, partnerships, corporations, trusts, government agencies, housing agencies, Indian tribes, and nonprofit organizations except where a mortgage holds legal title to property serving as collateral for a mortgage loan, in which case the owner would be the mortgagor (40 CFR 745.103).

Paint in Poor Condition

More than 10 ft² of deteriorated paint or exterior components with large surface areas; or more than 2 ft² of deteriorated paint on interior components with large surface areas (e.g., walls, ceilings, floors, doors); or more than 10 percent of the total surface area of the component is deteriorated on interior or exterior components with small surface areas (window sills, baseboards, soffits, trim) (40 CFR 745.223).

Risk Assessment

An onsite investigation to determine and report the existence, nature, severity, and location of Lead-Based Paint (LBP) hazards in residential dwellings, including (40 CFR 745.103):

1. information gathering regarding the age and history of the housing and occupancy by children under the age of 6
2. visual inspections
3. limited wipe sampling or other environmental sampling techniques
4. other activity as may be appropriate
5. provision of a report explaining the results of the investigation.

Visual Inspection for Risk Assessment

The visual examination of a residential dwelling or a child-occupied facility to determine the existence of deteriorated lead-based paint or other potential sources of lead-based paint hazards (40 CFR 745.223).

EPA Identification Number

The 12-digit number assigned to a facility by U.S. EPA upon notification of PCB waste activity under 40 CFR 761.205 (40 CFR 761.3). (MN7210890565) license for PCBs in 1998.

Excluded PCB Products

PCB materials which appear at concentrations less than 50 ppm, including but not limited to (40 CFR 761.3):

1. Non-Aroclor inadvertently generated PCBs as a byproduct or impurity resulting from a chemical manufacturing process.
2. Products contaminated with Aroclor or other PCB materials from historic PCB uses (investment casting waxes are one example).
3. Recycled fluids and/or equipment contaminated during use involving the products described in paragraphs (a) and (b) of this definition (heat transfer and hydraulic fluids and equipment and other electrical equipment components and fluids are examples).
4. Used oils, provided that in the cases of paragraphs (1) through (4) of this definition:
 - a) The products or source of the products containing < 50 ppm concentration PCBs were legally manufactured, processed, distributed in commerce, or used before October 1, 1984.
 - b) The products or source of the products containing < 50 ppm concentrations PCBs were legally manufactured, processed, distributed in commerce, or used, i.e., pursuant to authority granted by U.S. EPA regulation, by exemption petition, by settlement agreement, or pursuant to other Agency-approved programs;
 - c) The resulting PCB concentration (i.e. below 50 ppm) is not a result of dilution, or leaks and spills of PCBs in concentrations over 50 ppm.

Fluorescent Light Ballast

A device that electrically controls fluorescent light fixtures and that includes a capacitor containing 0.1 kg or less of dielectric (40 CFR 761.3).

Generator of PCB Waste

Any person whose act or process produces PCBs that are regulated for disposal under Subpart D of 40 CFR 761, or whose act first causes PCBs or PCB Items to become subject to the disposal requirements of Subpart D of 40 CFR 761, or who has physical control over the PCBs when a decision is made that the use of the PCBs has been terminated and therefore is subject to the disposal requirements of Subpart D of 40 CFR 761. Unless another provision of 40 CFR 761 specifically requires a site-specific meaning, "generator of PCB waste" includes all of the sites of PCB waste generation owned or operated by the person who generates PCB waste (40 CFR 761.3).

High Concentration PCBs

PCBs that contain 500 ppm or greater PCBs, or those materials which the U.S. EPA requires to be assumed to contain 500 ppm or greater PCBs in the absence of testing (40 CFR 761.123).

Double Wash/Rinse

A minimum requirement to cleanse solid surfaces (both impervious and nonimpervious) two times with an

appropriate solvent or other material in which PCBs are at least 5 percent soluble (by weight). A volume of PCB-free fluid sufficient to cover the contaminated surface completely must be used in each wash/rinse. The wash/rinse requirement does not mean the mere spreading of solvent or other fluid over the surface, nor does the requirement mean a once-over wipe with a soaked cloth. Precautions must be taken to contain any runoff resulting from the cleansing and to dispose properly of wastes generated during the cleansing (40 CFR 761.123).

Manifest

The shipping document U.S. EPA form 8700-22 and any continuation sheet attached to U.S. EPA form 8700-22, originated and signed by the generator of PCB waste in accordance with the instructions included with the form and Subpart K of 40 CFR 761 (40 CFR 761.3).

Municipal Solid Wastes

Garbage, refuse, sludges, wastes, and other discarded materials resulting from residential and non-industrial operations and activities, such as household activities, office functions, and commercial housekeeping wastes (40 CFR 761.3).

PCB Household Waste

PCB waste that is generated by residents on the premises of a temporary or permanent residence for individuals (including individually owned or rented units of a multi-unit construction), and that is composed primarily of materials found in wastes generated by consumers in their homes. PCB household waste includes unwanted or discarded non-commercial vehicles (prior to shredding), household items, and appliances or appliance parts and wastes generated on the premises of a residence for individuals as a result of routine household maintenance by or on behalf of the resident. Bulk or commingled liquid PCB wastes at concentrations of ≥ 50 ppm, demolition and renovation wastes, and industrial or heavy duty equipment with PCBs are not household wastes (40 CFR 761.3).

Porous Surface

Any surface that allows PCBs to penetrate or pass into itself including, but not limited to, paint or coating on metal; corroded metal; fibrous glass or glass wool; unglazed ceramics; ceramics with a porous glaze; porous building stone such as sandstone, travertine, limestone, or coral rock; low-density plastics such as styrofoam and low-density polyethylene; coated (varnished or painted) or uncoated wood; concrete or cement; plaster; plasterboard; wallboard; rubber; fiberboard; chipboard; asphalt; or tar paper. For purposes of cleaning and disposing of PCB remediation waste, porous surfaces have different requirements than non-porous surfaces (40 CFR 761.3).

Residential/Commercial Areas

Those areas where people live or reside, or where people work in other than manufacturing or farming industries. Residential areas include housing and the property on which housing is located, as well as playgrounds, roadways, sidewalks, parks, and other similar areas within a residential community. Commercial areas are typically accessible to both members of the general public and employees and include public assembly properties, institutional properties, stores, office buildings, and transportation centers (40 CFR 761.123).

Responsible Party

The owner of the PCB equipment, facility, or other source of PCBs or his/her designated agent (e.g., a facility manager or foreman). (40 CFR 761.123).

Spill

Both intentional and unintentional spills, leaks, and other uncontrolled discharges where the release results in any quantity of PCBs running off or about to run off the external surface of the equipment or other PCB source, as well as the contamination resulting from those releases. This policy applies to spills of 50 ppm or greater PCBs. The concentration of PCBs spilled is determined by the PCB concentration in the material spilled as opposed to the concentration of PCBs in the material onto which the PCBs were spilled. Where a spill of untested mineral oil occurs, the oil is presumed to contain greater than 50 ppm, but less than 500 ppm PCBs and is subject to the relevant requirements of this policy (40 CFR 761.123).

Spill Area

The area of soil on which visible traces of the spill can be observed plus a buffer zone of 1 foot beyond the visible traces. Any surface or object (e.g., concrete sidewalk or automobile) within the visible traces area or on which visible traces of the spilled material are observed is included in the spill area. This area represents the minimum area assumed to be contaminated by PCBs in the absence of precleanup sampling data and is thus the minimum area which must be cleaned (40 CFR 761.123).

Standard Wipe Test

For spills of high-concentration PCBs on solid surfaces, a cleanup to numerical surface standards and sampling by a standard wipe test to verify that the numerical standards have been met. This definition constitutes the minimum requirements for an appropriate wipe testing protocol. A standard-size template (10 centimeters (cm) x 10 cm) will be used to delineate the area of cleanup; the wiping medium will be a gauze pad or glass wool of known size which has been saturated with hexane. It is important that the wipe be performed very quickly after the hexane is exposed to air. U.S. EPA strongly recommends that the gauze (or glass wool) be prepared with hexane in the laboratory and that the wiping medium be stored in sealed glass vials until it is used for the wipe test. Further, U.S. EPA requires the collection and testing of field blanks and replicates (40 CFR 761.123).

TSCA

The Toxic Substances Control Act (15 U.S.C. 2601 et seq.) (40 CFR 761.3).

TSCA PCB Coordinated Approval

The process used to recognize other federal or state waste management documents governing the storage, cleanup, treatment, and disposal of PCB wastes. It is the mechanism under TSCA for accomplishing review, coordination, and approval of PCB waste management activities which are conducted outside of the TSCA PCB approval process, but require approval under the TSCA PCB regulations at 40 CFR 761 (40 CFR 761.3).

Unit

A particular building, structure, or cell used to manage PCB waste (including, but not limited to, a building used for PCB waste storage, a landfill, an industrial boiler, or an incinerator) (40 CFR 761.3).

ACBM Asbestos-Containing Building Material

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AHERA The Asbestos Hazard Emergency Response Act of 1986

ATSDR Agency for Toxic Substances and Disease Registry

CFR Code of Federal Regulations

MAG Magnesium Based Insulation

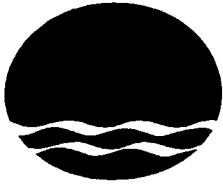
MDH Minnesota Department of Health

MPCA Minnesota Pollution Control Agency

PCBs Polychlorinated Byphenyls

Appendix A

**Minnesota Pollution Control Agency Letter To Finlandia LLC
Requesting Asbestos Survey Information and MPCA Asbestos Inspection Report**



Minnesota Pollution Control Agency

July 15, 2003

CERTIFIED MAIL NO. 7002 0510 0001 9397 5290
RETURN RECEIPT REQUESTED

Ms. Nora Rottier
Finlandia, LLC
1501 University Avenue Southeast No. 306
Minneapolis, MN 55414

RE: Request for Information - Finlandia LLC (Air Force Base) Superfund Site

Dear Ms. Rottier:

On April 2, 2002, the Minnesota Pollution Control Agency (MPCA) conducted an inspection of the Finland Air Force Base, located in Finland, Minnesota, owned by Finlandia LLC (Company). During the time of the inspection, MPCA staff observed numerous buildings with suspect asbestos-containing (ACM) material in poor condition. Suspect ACM included floor tile, wrapped boiler and piping, etc.

The MPCA is requesting the information below pursuant to Minn. Stat. § 116.07, subd. 9, Minn. Stat. § 116.091, subd. 1, and Section 114 of the Clean Air Act, 42 U.S.C. Section 7414. The state of Minnesota has been delegated Section 114 authority by the United States Environmental Protection Agency. The MPCA requests the following information.

1. Has an asbestos survey been conducted on any of the buildings on site? If so, please provide a copy.
2. Has any asbestos abatement been conducted? If so, when did it occur and who performed the abatement? Please include names, addresses, and phone numbers of all parties that may have done any ACM removal from any of the buildings.
3. What types of ACM was removed and from which buildings? Please provide copies of any documentation that the Company received from the people or companies that did asbestos removal prior to, during or after the abatement, including any written reports and waste shipment records.
4. What are the current plans for the site, i.e., are buildings scheduled to be renovated or demolished? Does the Company have anyone contracted to do renovation or demolition? If so, please provide a copy of all contracts with any contractors doing work on any of the buildings.

Ms. Nora Rottier
Finlandia, LLC
Page 2

It has come to the MPCA staff's attention that some of the buildings on site will be demolished in the near future. Be advised that Title 40 Code of Federal Regulation (CFR) 61.145 (a) states, in part "... the owner or operator of a demolition or renovation activity and prior to the commencement of the demolition or renovation, thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable ACM..." In addition to the asbestos survey, abatement will be required to be conducted by a Minnesota Department of Health licensed abatement contractor. Enclosed is a copy of 40 CFR Part 61 which covers the asbestos and demolition requirements for regulated facilities such as the Finland Air Force Base.

Please submit the information requested above within ten days of the receipt of this letter. If you have any questions regarding this matter, please contact me at (651) 297-5518.

Sincerely,



Jacqueline M. Deneen
Asbestos Program Coordinator
Metro Region
Regional Environmental Management Division

JMD:dac

cc: Ann Cohen, Attorney General's Office
Kathleen Winters, Attorney General's Office
Stephen B. Scallen, Owner
Dan Peña, MDH St. Paul Office
Curt Gadazc, Solid Waste Officer, Lake County
Chacke Y. Scallen, Vice President, Juno Investment Corporation
Jim Gumtow, Manager, Look Out Village, Finland, MN
Heidi Kroening, MPCA Duluth Office
Jane Mosel, MPCA Duluth Office
Asbestos File

July, 2002

**CERTIFIED MAIL NO.
RETURN RECEIPT REQUESTED**

Steve Scallen, Owner

Finland, Minnesota 5

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Sincerely,

Jacqueline M. Deneen
Asbestos Program Coordinator
Metro Region
Regional Environmental Management Division

cc: Chacke Scallen, Vice President, Juno Investments
Heidi Kroening, MPCA Duluth Office
Jane Mosel, MPCA Duluth Office
Dan Pena, MDH Duluth Office
Curt Gadazc, Solid Waste Officer, Lake County
Jim Guntow, Manager, Look Out Village, Finland, MN
Asbestos File

Appendix B

MPCA asbestos inspection reports September 2003, and December 2003



Minnesota Pollution Control Agency

ASBESTOS DEMOLITION & RENOVATION INSPECTION FIELD DATA COLLECTION CHECKLIST

I. General Information:

Contractor Name: NA

Contractor Address: _____

Telephone Number:() _____ Fax Number () _____

Facility/Site Name: Finlandia LLC/ Lookout Mtn. Village

Facility Site Address: Finland Air Base

Telephone Number: () _____ Fax Number () _____

Date of Inspection: 12/4/03 Time of Inspection: 9:00am-11:30am

Inspection Team (Case Lead and all other members of the inspection team) CLH, JMD

Reason For Inspection: (check all that apply)

- | | |
|---|-----------------------------------|
| 1. Routine Compliance Inspection: _____ | 2. Citizen Complaint: _____ |
| 2. Suspected Non-Notifier: _____ | 4. Joint: _____ |
| 5. Order/Consent Decree: _____ | 6. Other: <u>X-Superfund site</u> |

Site Activity at Time of Inspection: no activity

II. Pre-Entry Observations and Building Information:

Building Occupied: Yes: X (residential) No: X (non-residential)

Use: Old Airforce Barracks-residential; Old AirForce operations-vacant

Age: _____ Square Feet: unknown-multiple buildings

Is the worksite in an area of high population density or otherwise likely to impact on a sensitive receptor(describe): Yes-residents live nearby in an isolated area; Already contamination issues on-site.

Land use surrounding Site: Wooded/ undeveloped

III. Remote Observations:

	Yes	No
Visible Emissions to the Outside Air	_____	_____ <u>X</u> _____
Suspect RACM debris observed outside removal area:	<u>X</u> _____	_____
If yes, describe: <u>MPCA staff observed and documented RACM debris on the floor in</u>		
<u>Building #205; #112; #211; #214</u>		

IV. Entry To Site:

List Each Person, by name, title, and company to whom credentials were presented:

Jim Gumtoe-Site Manager for Finlandia LLC

Was entry granted: X _____

If entry was refused identify the person by name, title, and company who denied entry:

V. Contractors and other Operators involved in the Site:

A. Asbestos Abatement Contractor

Name of Abatement Project Supervisor: N/A

Is the Supervisor licensed by MN as an asbestos abatement site supervisor:

Number of Employees on-site: _____

B. Facility Owner

Name and title of on-site representative: Jim Gumtoe, Site Manager

C. Environmental Consulting/Air Monitoring Firm

Company Name: NA

Address: _____

Telephone Number: _____

Identify the Hygienist by name and title: _____

Determine how often the hygienist is present in the actual areas where asbestos is being removed:

VI. Activity Description

Actual Asbestos Disturbance Start Date: unknown-prior to 9/2003

Start Date as listed on the notification: N/A

Describe changes/modifications to notification: Many non-residential buildings from AirForce Base are falling apart and contain friable asbestos and lead-based paint deterioration is prevalent.

Type of Abatement Occurring:

- 1. Renovation: Scheduled _____ Emergency _____
- 2. Demolition Scheduled X Ordered _____

VII. Inspection Observations

**(Building #112: friable RACM on floor in unsecured building; #205: broken floor tile from abatement in basement closet; #211: broken floor tile from abatement in boxes in upstairs room; #212: ceiling tile on floor in bathroom; #214: TSI from pipe salvaging in first floor bathroom)*

Types of Suspect RACM

Insulation

Pipe insulation (felt, air cell, preform, mag) mag (Building #214)

Block Insulation: _____ Asbestos-Containing Paper: _____

Surfacing Materials

Plaster: _____ Plaster: _____ Stucco: _____

Joint Compound: _____ Spray-on (acoustical, decorative, or insulative): _____

Miscellaneous

Ceiling Tiles: X Acoustical Tiles: _____

(Building #212)

Category I Nonfriable ACM

Packings: _____ Gaskets: _____ Asphalt Roofing Products: _____

Resilient Floor Coverings (vinyl asbestos tile, asphalt asbestos tile, linoleum) X

Will the Category I ACM be disturbed by the Demo/Reno? Yes

Is the Category I ACM in good condition: No

Will the Category I ACM be made regulated (describe removal methods used): Yes
Building #205; Building #108; Building #112; Building #211; Building #212; Building
#213; Building #214

Category II Nonfriable ACM

Extrusion Panels: _____ Clapboards/Shingles: _____ Millboard: _____
 Vinyl Wallpaper: _____ Pegboard: _____ Putties: _____
 Sealants: _____ Adhesives (mastics): X Paints and coatings: _____
 Asbestos cement, sheeting or piping: _____ Textiles: _____

Will the Category II ACM be disturbed by the Demo/Reno? Yes

Is the Category II ACM in good condition: _____ No

Will the Category II ACM be made regulated (describe removal methods used): Yes-
materials are in bad condition so any method would make it regulated

VIII. Emission Control Procedures

	YES	NO	NA
ACM not discovered until after demo/reno commenced:	___	___	<u>X</u>
Unit/Section removal:	___	<u>X</u>	___
If yes, is RACM wet whenever exposed:	___	<u>X</u>	___
Is the unit being removed carefully lowered to the floor without dropping, throwing, sliding, damaging, or otherwise disturbing the RACM:	___	<u>X</u>	___
Owner/Operator granted a variance from wetting: (if temp <32 degrees is the reason, examine temp records)	___	<u>X</u>	___

IX. Evaluation of Wetting

Is there a water or wetting agent nearby: _____ X

If "yes" what equipment is used to apply it: _____

Is water or a wetting agent observed being sprayed on RACM: _____ X

Is there visible dust (airborne or settled), or dry suspect RACM in the immediate vicinity of the operation: X _____

Explain: Dry suspect debris covered the floor in numerous buildings.

Is RACM awaiting containerization adequately wet: X

Are the containers leak-tight: X

Are there any open or damaged containers: X

How many:

Are the contents of these containers adequately wet:

Are there any visible emissions:

X. Waste Control

YES NO NA

1. Visible Emissions to the outside Air: X

2. Is there any suspect ACM on the ground: X

3. Is the Owner/Operator choosing to properly label and seal ACWM in leak-tight containers as an alternative to the "No Visible Emission" Standard (if yes, answer the questions below): X

YES NO NA

a. Adequately wet and placed in leak-tight containers: X

b. Is ACWM labeled with the OSHA warning label: X

c. Is the ACWM labeled with the Waste Generator Label: X

4. Are vehicles/containers used in the transport of ACWM labeled during loading and unloading: X

5. Is all ACWM being deposited at a site operating in accordance with the provisions of 61.154: X

XI. Waste Manifests: the following information may not be available on-site

There was no active abatement done at the site yet.

1. For all ACWM transported off the Facility site maintain WSR with the following info:

a. Name, address, & phone # of the Waste generator:

b. Name & address of the MPCA:

c. Quantity of ACWM listed in cubic meters or yards:

d. Name & phone # of the disposal site operator:

e. Name & physical site location of the disposal site:

f. The date transported:

- g. A certification that the ACWM is accurately described: ___ ___ ___
2. Are copies of WSR being maintained for two years: ___ ___ ___

XII. Sample(s):

**Second set of numbers indicate building # where sample taken*

Sample #	Picture #	Time	Sample Type
1-101		900-1130 am	Floor tile with mastic
2-212		900-1130 am	Ceiling tile
3-214		900-1130 am	TSI debris
4-214		900-1130 am	TSI debris
5		900-1130 am	
6		900-1130 am	
7		900-1130 am	

XIII. Comments:

Comments should include recommendations/discussions with Owner/Operator as well as a description of removal methods, packaging procedures and any observations made involving the project.

See violation section and other sections for asbestos comments.

Building #101: 1 exterior paint sample; 1 sample of floor tile with mastic; 1 sample of 1x1 ceiling tile

Building #107: 2 exterior paint samples

Building #108: Floor tile in bad condition, fluorescent lights and ballasts

Building #112: Still unsecured since September 2003; Took 4 paint samples from floor

Building fire #7500: Processing smoked fish in the building; Floor tile in bad condition-renters going to remove the tile.

Building #205: Floor tile abated from multiple points in the building-broken and piled in a closet in the basement (1 sample of floor tile with mastic from closet).

Building #211: Floor tile removed from first floor and upstairs; Floor tile from abatement stacked in boxes in upstairs room-took one sample of floor tile.

Building #212: Ceiling tile broken up in bathroom (1 sample); Floor tile in bad condition (upstairs)

Building #213: Floor tile in bad condition throughout building

Building #214: Pipe salvaged from first floor bathroom (2 samples)

Violation(s):

List violation citation and a short description of the violation

Asbestos in poor condition in all building inspected. Possible violations for improper abatement of floor tile in Buildings #205 and #211. Pipe salvaging in Building #214 disturbed TSI.

Lead-based paint in poor condition-flaking off walls and substrate and covering floor in all accessible buildings.

All buildings need to be secured to avoid exposure to residents. Clean-up and abatement of RACM and LBP need to occur prior to renovation or demolition. An asbestos and lead survey need to occur as well.

Inspector Signature

Date



Minnesota Pollution Control Agency

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III. Remote Observations:

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Suspect RACM debris observed outside removal area:	<u> X </u>	_____
If yes, describe: <u> MPCA staff observed and documented RACM debris on the floor in Building #112; Building #101; Building #107; Building #203. *Some building not accessible. </u>		

IV. Entry To Site:

List Each Person, by name, title, and company to whom credentials were presented:
 Jim Gumtoe-Site Manager for Finlandia LLC; Steve Scanlon-woner of Juno (co-owner/manager with Finlandia LLC)

Was entry granted: X _____

If entry was refused identify the person by name, title, and company who denied entry:

V. Contractors and other Operators involved in the Site:

A. Asbestos Abatement Contractor
Name of Abatement Project Supervisor: N/A
Is the Supervisor licensed by MN as an asbestos abatement site supervisor:
Number of Employees on-site: _____

B. Facility Owner
Name and title of on-site representative: Jim Gumtoe, Site Manager

C. Environmental Consulting/Air Monitoring Firm
Company Name: NA
Address: _____

Telephone Number: _____
Identify the Hygienist by name and title: _____
Determine how often the hygienist is present in the actual areas where asbestos is being removed:

VI. Activity Description

Actual Asbestos Disturbance Start Date: unknown-prior to 9/2003

Start Date as listed on the notification: N/A

Describe changes/modifications to notification: Many non-residential buildings from AirForce Base are falling apart and contain friable asbestos and lead-based paint deterioration is prevalent.

Building #107 is the first building scheduled to be demolished.

Type of Abatement Occurring:

1. Renovation: Scheduled _____ Emergency _____

2. Demolition Scheduled X Ordered _____

VII. Inspection Observations

**(Building #107: TSI on pipes; Building #203: mag falling off boilers; Building #207: aircell on pipes sticking out of building; Building #112: mag, perform, aircell; Building #101: TSI on boilers)*

Types of Suspect RACM

Insulation

Pipe insulation (felt, air cell, preform, mag) mag, perform, aircell

Block Insulation: _____ Asbestos-Containing Paper: _____

Surfacing Materials

Plaster: _____ Plaster: _____ Stucco: _____

Joint Compound: _____ Spray-on (acoustical, decorative, or insulative): _____

Miscellaneous

Ceiling Tiles: X Acoustical Tiles: _____

(Building #101)

Category I Nonfriable ACM

Packings: X Gaskets: _____ Asphalt Roofing Products: _____

Resilient Floor Coverings (vinyl asbestos tile, asphalt asbestos tile, linoleum) X

Will the Category I ACM be disturbed by the Demo/Reno? Yes

Is the Category I ACM in good condition: No

Will the Category I ACM be made regulated (describe removal methods used): Yes

Building #101; Building #112; Building #203

Category II Nonfriable ACM

Extrusion Panels: X Clapboards/Shingles: _____ Millboard: _____

Vinyl Wallpaper: _____ Pegboard: _____ Putties: _____

Sealants: _____ Adhesives (mastics): X Paints and coatings: _____

Asbestos cement, sheeting or piping: X Textiles: _____

Will the Category II ACM be disturbed by the Demo/Reno? Yes

Is the Category II ACM in good condition: No

Will the Category II ACM be made regulated (describe removal methods used): Yes-

materials are in bad condition so any method would make it regulated

VIII. Emission Control Procedures

	YES	NO	NA
ACM not discovered until after demo/reno commenced:	_____	_____	<u>X</u>
Unit/Section removal:	_____	<u>X</u>	_____
If yes, is RACM wet whenever exposed:	_____	<u>X</u>	_____
Is the unit being removed carefully lowered to the floor without dropping, throwing, sliding, damaging, or otherwise disturbing the RACM:	_____	<u>X</u>	_____
Owner/Operator granted a variance from wetting: (if temp <32 degrees is the reason, examine temp records)	_____	<u>X</u>	_____

IX. Evaluation of Wetting

Is there a water or wetting agent nearby:	_____	_____	<u>X</u>
If "yes" what equipment is used to apply it: _____			
Is water or a wetting agent observed being sprayed on RACM:	_____	_____	<u>X</u>
Is there visible dust (airborne or settled), or dry suspect RACM in the immediate vicinity of the operation:	<u>X</u>	_____	_____

Explain: Dry suspect debris covered the floor in numerous buildings.

Is RACM awaiting containerization adequately wet: X

Are the containers leak-tight: X

Are there any open or damaged containers: X

How many:

Are the contents of these containers adequately wet:

Are there any visible emissions:

X. Waste Control

YES NO NA

1. Visible Emissions to the outside Air: X

2. Is there any suspect ACM on the ground: X

3. Is the Owner/Operator choosing to properly label and seal ACWM in leak-tight containers as an alternative to the "No Visible Emission" Standard (if yes, answer the questions below): X

YES NO NA

a. Adequately wet and placed in leak-tight containers: X

b. Is ACWM labeled with the OSHA warning label: X

c. Is the ACWM labeled with the Waste Generator Label: X

4. Are vehicles/containers used in the transport of ACWM labeled during loading and unloading: X

5. Is all ACWM being deposited at a site operating in accordance with the provisions of 61.154: X

XI. Waste Manifests: the following information may not be available on-site

There was no active abatement done at the site yet.

1. For all ACWM transported off the Facility site maintain WSR with the following info:
- a. Name, address, & phone # of the Waste generator:
 - b. Name & address of the MPCA:
 - c. Quantity of ACWM listed in cubic meters or yards:
 - d. Name & phone # of the disposal site operator:
 - e. Name & physical site location of the disposal site:
 - f. The date transported:

- g. A certification that the ACWM is accurately described: ___ ___ ___
2. Are copies of WSR being maintained for two years: ___ ___ ___

XII. Sample(s):

**All samples taken from Building #112*

Sample #	Picture #	Time	Sample Type
1		1030-1130 am	Backer board debris-floor
2		1030-1130 am	Preform debris along wall
3		1030-1130 am	Preform debris along wall
4		1030-1130 am	Transite debris on floor
5		1030-1130 am	Transite debris on floor
6		1030-1130 am	12" pipe mag debris
7		1030-1130 am	12" pipe mag debris
8		1030-1130 am	9x9 green floor tile-poor condition
9		1030-1130 am	Aircell-bathroom pipe
10		1030-1130 am	Aircell-bathroom pipe

XIII. Comments:

Comments should include recommendations/discussions with Owner/Operator as well as a description of removal methods, packaging procedures and any observations made involving the project.

See violation section and other sections for asbestos comments.

Building #107 (scheduled for demo first): PCB's still there; unknown drums; LBP flaking; pipe runs with friable RACM

Building #203: Pipes sticking out on top-ACM?; uncovered drums outside that supposed to contain floor tile asbestos; disturbed mag on boilers

Building #207: Not accessible; Aircell on pipes coming out of building

Building #208: Not accessible

Building #112: Took 10 asbestos samples; Worst condition of all building-disturbed asbestos covering the floor; flaking lead-based paint all over the floor—whole building should go as ACM contaminated

Building #108: Not accessible

Building #101: RACM on boilers, ceiling tile, floor tile -some disturbed; Building appears unsafe

Sample #1 (Backer board-floor) result as 30% Chrysotile asbestos.

Sample #2 (Preform debris along wall) result as 5% Chrysotile asbestos.

Sample #3 (Preform debris along wall) result as 5% Chrysotile asbestos.

Sample #4 (Transite debris on floor) result as non-detect.

Sample #5 (Transite debris on floor) result as non-detect.

Sample #6 (12" pipe mag debris) result as 15% Amosite asbestos.

Sample #7 (12" pipe mag debris) result as 15% Amosite asbestos.

Sample #8 (9x9 green floor tile-poor condition) result as 5% Chrysotile in floor tile and 10% Chrysotile asbestos in mastic.

Sample #9 (Aircell-bathroom pipe) result as 2% Chrysotile asbestos.

Sample #10 (Aircell-bathroom pipe) result as 2% Chrysotile asbestos.

Violation(s):

List violation citation and a short description of the violation

Asbestos in poor condition and covering the floor of Building #112; #101; #203 (disturbed boilers)-see Section VII for details

Lead-based paint in poor condition-flaking off walls and substrate and covering floor in all accessible buildings.

All buildings need to be secured to avoid exposure to residents. Clean-up and abatement of RACM and LBP need to occur prior to renovation or demolition. An asbestos and lead survey need to occur as well.

Multiple horizontal lines for additional violation entries.

Inspector Signature

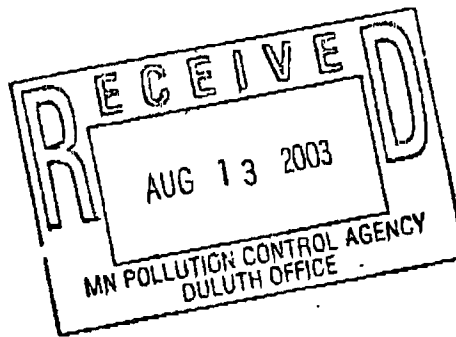
Date

Appendix C

**Finlandia LLC/Juno Investments
Letter to the Minnesota Pollution Control Agency**

JUNO INVESTMENT CORPORATION

1501 UNIVERSITY AVENUE SE, MINNEAPOLIS, MINNESOTA 55414
TELEPHONE (612) 623-0335
FAX (612) 623-0646



August 11, 2003

**Jane Mosel
MPCA
525 Lake Avenue South Suite 400
Duluth, MN 55802**

Dear Ms. Mosel:

We are reporting on progress at our project in Finland, Minnesota.

First, I need to mention that all the debris shown on the enclosed photographs, which were represented to me as the current condition, had already been removed at the time of your visit. Since the other photographs, all of which were not labeled, were not known to us, we cannot comment on many of them.

Second, the transformers were tested by CLP for PCB's, and all the transformers containing PCB's were removed. I enclose the paperwork on the removal. We paid all the cost of the removal, although we believe that CLP owned the transformers. CLP has promised that the other transformers, which involve no PCB's and no violation of any kind, would be removed by them by today. They have not been removed yet and we have contacted them today about this. Today they said that they would be removed by the end of August.

Third. The gate has been installed and security improved. Most of the open buildings have been secured.

Fourth. We have completed negotiations with an asbestos abatement contractor for removal of the asbestos in the garage building. We expect this work to proceed in accordance with MPCA procedures shortly.

Fifth. We are contacting lead abatement contractors regarding the garage building and we will let you know how those discussions come out.

Sixth. The sewage treatment plant update project has been completed and the plant is operating.

Seventh. The management has been after residents to clean up their yards, with very nice results. There are two or three problem yards remaining, including _____ and we are working on those.

We are concerned with MPCA's interest in several issues which seem unrelated to the sewage treatment plant or the TCE project by the US government. We wish you would put more effort into getting the Air Force to clean up the mess they created. We do not understand why part of the visiting team comes and says "nothing has changed in five years" or why photographs are shown of conditions that no longer remain, as if they did remain. We want to cooperate with you and your agency in all parts of the environmental agenda, and we thank you for coming to Minneapolis to meet with me.

Sincerely,

Chacke' Y. Scallen

Chacke' Y. Scallen

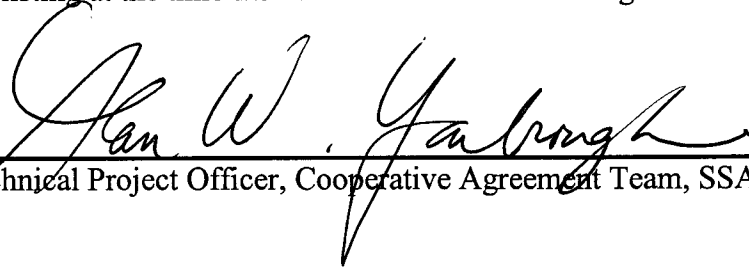
Vice President





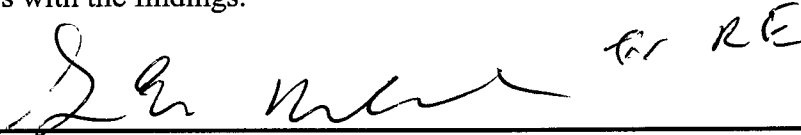
Certification

This Finland Radar Station (Lookout Mountain Village) Health Consultation was prepared by the Minnesota Department of Health under a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ATSDR). It is in accordance with approved methodology and procedures existing at the time the health consultation was begun.



Technical Project Officer, Cooperative Agreement Team, SSAB, DHAC, ATSDR

The Division of Health Assessment and Consultation, ATSDR, has reviewed this public health consultation and concurs with the findings.



Team Leader, Cooperative Agreement Team, SSAB, DHAC, ATSDR