

Komatsu Mining Corp
Brenna Bellmer – Sr. Env. Spec.
Komatsu Mining Corp
401 E Greenfield Ave
Milwaukee, WI 53204

January 11, 2024

Riley D. Neumann
Wisconsin Department of Natural Resources – Spills
Coordinator – Southeastern Region

Re: Komatsu Mining Corp, South Harbor Facility SERTS ID 20231206SE41-1

Dear Riley Neumann:

Komatsu is following up to summarize activities performed in response to the release at their South Harbor facility, located at 311 E. Greenfield Avenue in Milwaukee, that occurred on 12/4/2023, and was subsequently reported to the WDNR Spills Hotline.

On 12/4/2023 an approximate 6' x 10' portion of grass immediately adjacent to the manufacturing facility compressor room, where the compressor room condensate line discharges, was observed to have been impacted. It was apparent that compressor oil along with condensate water had been discharged through the compressor condensate line onto the grass outside the compressor room. The condensate from the building's compressors is collected in a sump crock, which automatically discharges when the water level in the sump raises the float and activates the pump. Further investigation into the cause of the release revealed that a malfunction with the compressor's oil-water separator filter bags had allowed compressor oil into the condensate line, which was then released onto the grass. Based on observations of the condensate sump pit, no more than one gallon of compressor oil was released. In the compressor room, the discharge line from the condensate sump was re-routed to discharge into a 330-gallon tote, thereby eliminating the outside discharge of condensate water.

Komatsu contacted Veolia ES Technical Solution's Emergency Response Division (Veolia) immediately to initiate a response. Komatsu provided Veolia with a site map, subsurface utility map, compressor oil SDS, and details regarding the subsurface soil profile that covers the manufacturing facility surface. The facility has a 24" clean soil cap overlying historically impacted native soils, which needs to have the integrity maintained.

On 12/5/2023 Veolia contractor North Shore Environmental (North Shore) mobilized to the site for initial evaluation. Any free-standing condensate water with oil was absorbed using granular absorbents, a shallow dike was dug around the impacted area and filled with absorbent socks, and the area was covered with a plastic sheet to protect from potential precipitation until response activities could be completed.

On 12/6/2023, out of an abundance of caution, Komatsu reported the release to the WDNR Spills Hotline. The incident was assigned SERTS ID 20231206SE41-1. North Shore mobilized to the South Harbor facility and met with a private utility locator to scan the impacted area for subsurface utilities.

On 12/8/2023 North Shore mobilized to the South Harbor site with an excavator and a waste roll off bin. The impacted grass area was excavated and visual, olfactory and PID readings were used to determine the extent of excavation. The excavation was completed at less than one foot of depth. The excavated soil was placed into the lined roll off bin. A representative from Veolia collected a sample of the soil for waste profiling purposes. After excavation was complete, clean

backfill was brought onsite and used to fill the excavated area back to level with the surrounding grade. The roll off bin was covered and was to remain onsite until the waste profile was completed, and the soil was accepted to a disposal facility.

On 12/21/2023 Veolia completed the waste profile for the soil and received acceptance from a landfill for disposal.

On 12/27/2023 North Shore transported the roll off bin from the South Harbor facility to Waste Management's Orchard Ridge RDF landfill for disposal.

A site location map, showing the facility and location of the spill, is attached. The soil waste profile, and the landfill disposal manifest are also attached. Finally, a photo log documenting the response efforts is provided.

Based on the above-described field activities, the extent of the compressor oil spill has been sufficiently remedied. Komatsu is requesting that the WDNR close the spill and no further action is required.

If you have any questions or would like additional information, please reach out to me directly.

Sincerely,

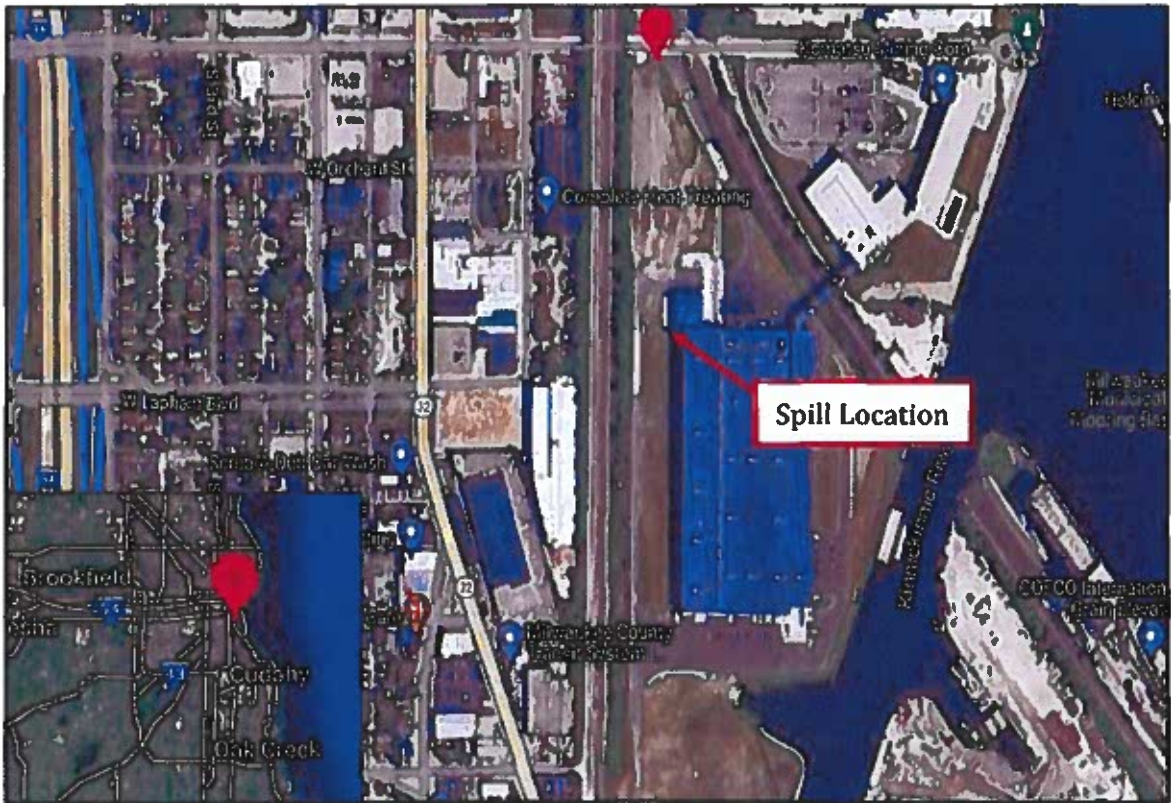


Brenna Bellmer
Senior Environmental Specialist

Attachment 1

Site Location Map

Komatsu South Harbor
311 E. Greenfield Ave.
Milwaukee, WI 53204



**Komatsu Mining Corporation Emergency Response Project Location
311 E Greenfield Avenue, Milwaukee, WI 53204**

43.06573, -87.91952

Attachment 2
Waste Disposal Documentation



EZ Profile™

Requested Facility: Orchard Ridge RDF, Metro RDF Unsure Profile Number: 140261WI
 Multiple Generator Locations (Attach Locations) Request Certificate of Disposal Renewal? Original Profile Number: _____

A. GENERATOR INFORMATION (MATERIAL ORIGIN)

- Generator Name: Komatsu Mining
- Generator Site Address: 311 East Greenfield Ave
(City, State, ZIP) Milwaukee WI 53204
- County: Milwaukee
- Contact Name: Alan Kountz
- Email: alan.kountz@veolia.com
- Phone: (262) 255-6655 7. Fax: (262) 255-7890
- Generator EPA ID: WIR000180075 N/A
- State ID: _____ N/A

C. MATERIAL INFORMATION

- Common Name: Condensate (spiked soil)
Describe Process(es) Generating Material: See Attached
Condensate spill on virgin soil (quin syn is part of condensate)
- Material Composition and Contaminants: See Attached

1. Soil	95-100 %
2. Condensate	0-5 %
3.	
4.	
Total comp. must be equal to or greater than 100% <input checked="" type="checkbox"/> ≥100%	
- State Waste Codes: _____ N/A
- Color: brown/black
- Physical State at 70°F: Solid Liquid Other: _____
- Free Liquid Range Percentage: _____ to _____ N/A
- pH 4 _____ to 10 _____ N/A
- Strong Odor Yes No Describe: _____
- Flash Point <140°F 140°-199°F ≥200° N/A

E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION

- Analytical attached Yes
Please identify Lab Report(s) and list specific representative Sample ID#s:
023L0349 Final 20231220 R PT 01 is a representative sample of soil
- Other Information attached (such as SDS)? Yes

G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)

By signing this Waste Management ("WM") Profile, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that all relevant information necessary for proper material characterization and to identify known and suspected hazards has been provided. Any analytical data attached was derived from a sample that is representative as defined in 40 CFR 261 - Appendix 1 or by using an equivalent method. All changes occurring in the character of the material (i.e., changes in the process or new analytical) will be identified by the Generator and be disclosed to WM prior to providing the material to WM. I am aware that there are significant penalties for knowingly submitting false information.

- I am authorized to sign on behalf of the Generator and I have confirmed with the Generator that information contained in this profile, as well as supporting documents provided, are accurate and complete.
- I am a duly authorized employee of Generator holding a position of technical responsibility with direct knowledge of the waste stream and the information contained in this profile, and confirm that information contained in this profile, as well as supporting documents are accurate and complete.

B. BILLING INFORMATION SAME AS GENERATOR

- Billing Name: Veolia - ES Technical Solutions
- Billing Address: W124 N9451 Boundary Road
(City, State, ZIP) Menomonee Falls WI 53051
- Contact Name: Alan Kountz
- Email: alan.kountz@veolia.com
- Phone: (262) 255-6655 6. Fax: (262) 255-5794
- P.O. Number: _____
- Payment Method Credit Account Cash Credit Card at Gate

D. REGULATORY INFORMATION

- EPA Hazardous Waste? Yes* No
Code: _____
- State Hazardous Waste? Yes No
Code: _____
- Is this material non-hazardous due to Treatment, Delfisting, or an Exclusion? Yes* No
- Contains Underlying Hazardous Constituents? Yes* No
- Does the material contain benzene? Yes* No
- Facility remediation subject to 40 CFR 63 GGGGG? Yes* No
- CERCLA or State-mandated clean-up? Yes* No
- NRC, State-regulated, NORM or TENORM waste? Yes* No
*If Yes, see Addendum (page 2) for additional questions and space.
- Contains PCBs? → If Yes, answer a, b and c. Yes No
a. Regulated by 40 CFR 761? Yes No
b. Remediation under 40 CFR 761.61? Yes No
c. Were PCBs imported into the US? Yes No
- Regulated and/or Untreated Medical/Infectious Waste? Yes No
- Contains Asbestos? Yes No
→ If Yes: Non-Friable Non-Friable - Regulated Friable
- Contains Dioxins? (If Yes, please attach analysis) Yes No

F. SHIPPING AND DOT INFORMATION

- One-Time Event Repeat Event/Ongoing Business
- Estimated Annual Quantity/Unit of Measure: 20
 Tons Yards Drums Gallons Other _____
- Container Type and Size: 20 yard rolloff
- USDOT Proper Shipping Name _____ N/A
- Estimated Start Date 12/08/2023
- Transportation Needed? Yes* No

Name (Print): Brenna Bellmer
Title: Sr. Environmental Specialist
Company: Komatsu Mining
Date: 12/21/2023
Certification Signature

Brenna Bellmer

QUESTIONS? CALL 800 963 4776 FOR ASSISTANCE

Revised February 20, 2023 © 2023 WM Intellectual Property Holdings, L.L.C



NON-HAZARDOUS MANIFEST ³¹⁰⁰⁵

NON-HAZARDOUS MANIFEST		1. Generator's US EPA ID No. WI R 000180075	Manifest Doc No.	2. Page 1 of 1
2. Generator's Mailing Address: Komatsu Mining 311 East Greenfield Ave Milwaukee, WI 53024		Generator's Site Address (if different than mailing): Same		A. Manifest Number Komatsu001
4. Generator's Phone		B. State Generator's ID		
5. Transporter 1 Company Name North Shore Environmental Construction, Inc		6. US EPA ID Number	C. State Transporter's ID	
7. Transporter 2 Company Name		8. US EPA ID Number	D. Transporter's Phone	
9. Designated Facility Name and Site Address Orchard Ridge Landfill N96W13073 County Line Rd Menomonee Falls, WI 53051		10. US EPA ID Number	E. State Transporter's ID	
			F. Transporter's Phone	
			G. State Facility ID	
			H. State Facility Phone	
G E N E R A T O R	11. Description of Waste Materials		I. Containers	
	a. Condensate Impacted Soil		no.	Type
	WM Profile # 140261WM		01	CM
	b. WM Profile #			
	c. WM Profile #			
d. WM Profile #				
e. WM Profile #				
J. Additional Descriptions for Materials Listed Above		K. Disposal location		
15. Special Handling Instructions and Additional Information		Cell	Level	
		Grid		
Purchase Order #		EMERGENCY CONTACT / PHONE NO.:		
16. GENERATOR'S CERTIFICATE: I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.				
Printed Name: [Signature]		Printed Name or Title: [Signature]		Month: 12 Day: 15 Year: 13
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature: [Signature]		Month: Day: Year:
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature:		Month: Day: Year:
19. Certificate of Final Treatment/Disposal I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.				
20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest		Signature:		Month: Day: Year:



Orchard Ridge RDF
 W124 N9355 Boundary Road
 Menomonee Falls, WI, 53051
 Ph: (262) 253-8620

Reprint
 Ticket# 2253269

Customer Name VEOLIAESBOUNDARY VEOLIA ES TE Carrier NORTSHOREENV NORTSHORE ENV
 Ticket Date 12/27/2023 Vehicle# 43 Volume
 Payment Type Credit Account Container
 Manual Ticket# Driver
 Hauling Ticket# Check#
 Route Billing # 0004384
 State Waste Code A-24-33 Gen EPA ID
 Manifest NA
 Destination Grid
 PO
 Profile 140261WI (CONDENSATE IMPACTED SOIL)
 Generator 136-KOMATSUMINING KOMATSU MINING CORP GROUP

	Time	Scale	Operator	Inbound	Gross	54760 lb
In	12/27/2023 12:16:42	inbound	jgindt		Tare	38340 lb
Out	12/27/2023 12:32:08	Outbound	jgindt		Net	16420 lb
					Tons	8.21

Comments

Product	LD#	Qty	UOM	Rate	Tax	Amount	Origin
1 Dredged Sedi Soil-	100	8.21	Tons				WI

Total Tax
 Total Ticket

Driver's Signature

Attachment 3

Photo Log

Komatsu South Harbor

Photo Log

SERTS ID 20231206SE41-1



Mid-Project: Hydrophobic absorbent booms placed inside trench surrounding perimeter of release area.



Mid-Project: Removing impacted soil with a mini-excavator.



Mid-Project: Pressure washing the impacted wall and concrete slab following the detergent application.



Mid-Project: Grading the backfilled topsoil following the excavation.



Post-Project: Covering the excavation area following the backfilling with topsoil.