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HI-MILL MANUFACTURING CO.

FABRICATORS OF TUBE PRODUCTS AND GENERAL LIGHT MANUFACTURING
1704 HIGHLAND ROAD – HIGHLAND, MICHIGAN 48031
TELEPHONE: 887-4191

September 10, 1987

Oakland County Health Div.
Dept. of Institutional & Human Services
1200 N. Telegraph Road
Pontiac, MI 48053-1082

Re: MID005341714

Dear Mr. Frick:

To follow up on our possible exclusion of the chromium waste suggested as an option in your letter of July 1, 1987, we are enclosing an analysis of the wastes generated by our pickling process. This analysis is dated August 27, 1987.

We have also analysed our pickling operation from January 1, 1984 through August 31, 1987. Our average disposal of waste water during this period has been 667 gallons per month.

Also during this period our purchases of the materials used in our pickling operation has averaged as follows:

Nitric Acid	382 lbs per month
Sulphuric Acid	222 lbs per month
Caustic Soda	216 lbs per month
Sodium Bichromate	32 lbs per month
Total	852 lbs per month

The metric equivalent of 852 pounds would be 387 kilograms.

Since the nitric and sulphuric acids are neutralized to PH6 by the caustic soda, the only hazardous material left is the chromium from the sodium bichromate and our purchases of the sodium bichromate averaged 32 pounds or 14.5 kilograms per month.

After reviewing the above, please let us know if the chromium can be excluded from regulation.

Sincerely,

HI-MILL MANUFACTURING CO.

Herbert E. Hotchkiss, Jr.
Accountant

WASTE COMPLIANCE SERVICES

Specialists in Industrial Waste Analysis

12255 WORMER • REDFORD, MI 48239 • (313) 255-9600

REPORT OF ANALYSIS

August 27, 1987

SAMPL SUBMITTED BY:	Hi-Mill Manufacturing ATTN: Robert Beard/Norm Clark
DATE RECEIVED:	August 17, 1987
PROJECT NUMBER:	P-3537
REPORT NUMBER:	R-3537
ANALYSIS REQUESTED:	Hexavalent Chromium (Cr^{+6}), Trivalent Chromium (Cr^{+3}) and Cyanide analysis
METHOD OF ANALYSIS:	EPA test procedures
RESULTS:	Expressed in mg/kg (ppm) on the sample labeled, "Hi-Mill Chromic Waste", (S-9899)

PARAMETER	SAMPLE RESULT	DETECTION LIMIT
Chromium (Trivalent Cr^{+3})	523	0.10
Chromium (Hexavalent Cr^{+6})	369	0.10
Cyanide (CN^-)	$<$ 0.10	0.10

WASTE COMPLIANCE SERVICES
Analysis by Vishu Peketi
Vishu Peketi
Chemist

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REPORT OF ANALYSIS

August 27, 1987

SAMPLE SUBMITTED BY: Hi-Mill Manufacturing Co.

ATTN: Robert Beard/Norm Clark

DATE RECEIVED: August 17, 1987

PROJECT NUMBER: P-3537

REPORT NUMBER: R-3537

ANALYSIS REQUESTED: As, Ba, Cd, Cr, Pb, Hg, Se, Ag, Cu, and Zn analysis on the EP Filtrate

METHOD OF ANALYSIS: EPA test procedures, Federal Register Vol. 45 Part 261

RESULTS: Expressed in ug/ml (ppm) on the sample labeled: "Hi-Mill Chromic Waste Sample", (S-9899)

EPA HAZARDOUS WASTE NUMBER	CONTAMINANT	EP TOXIC LEVELS	SAMPLE RESULT (Filtrate)
D004	Arsenic-As	5	0.061
D005	Barium-Ba	100	1.4
D006	Cadmium-Cd	1	0.075
D007	Chromium-Cr	5	345
D008	Lead-Pb	5	$<$ 0.050
D009	Mercury-Hg	0.2	$<$ 0.002
D010	Selenium-Se	1	$<$ 0.050
D011	Silver-Ag	5	0.10
001D	Copper-Cu	100	980
003D	Zinc-Zn	500	18

1. Ignitability -----Non-ignitable (Flash Point: Greater than 140°F)
2. Reactivity -------Non-reactive
3. Corrosivity ------Non-corrosive
4. pH ---------- 2.2

NOTE: Thsi sample was filtered through 0.45 um membrane filter and the filtrate was analyzed for the above contaminants.

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Analysis by Vishu Peketi
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Chemist