Shook, Hardy & Bacon L.L.P.
www.shb.com

May 29, 2007

James H. Andreasen

2555 Grand Blvd.
Kansas City
Missouri 64108-2613
816.474.6550
816.421.5547 Fax
jandreasen@shb.com

Via Electronic Mail – kuehl.kori@epa.gov

Kori Kuehl,
Air, RCRA and Toxics Division
U.S. Environmental Protection Agency
Region VII
901 North Fifth Street
Kansas City, KS 66101.

RE: Final SEP Report for CAFO for C&R Plating, RCRA-07-2007-003

Dear Ms. Kuehl,

Please accept this as the Final SEP report called for in the Consent Agreement and Final Order (CAFO) entered between C&R Plating and the U.S. Environmental Protection Agency in resolution of alleged violations of the Resource Conservation and Recovery Act, Matter Number RCRA-07-2007-003. C&R Plating installed and put into operation a sludge dryer for solid waste from its plating operations in connection with the settlement described in the CAFO.

Cost of completed Supplemental Environmental Project. Attached for your information are invoices for labor and materials required for installation of the sludge dryer. As detailed below, C&R expended at least $56,034.59 to install the sludge dryer.

Tab 1 Lanco Corporation invoice for $22,500 for the 180G JWI Sludge Dryer that C&R installed as the SEP in this matter.

Tab 2 Three invoices from Griffin's, the contractor who installed gas, air and water lines for the system.

C&R incurred costs in connection with two separate natural gas installations in connection with the SEP. The facility did not have the capacity to bring in adequate gas to operate the sludge dryer along with the existing natural gas uses. Therefore, C&R was required to increase its natural gas capacity to accommodate the additional gas that is used by the sludge dryer. This work would not have been necessary but for the addition of the sludge dryer. Then, when the sludge dryer was in place, C&R incurred costs to connect the sludge dryer itself to the upgraded plant natural gas system.

RESP RECEIVED
MAY 30 2007

477294
RCRA BARCODE

Geneva
Houston
Kansas City
London
Miami
Orange County
San Francisco
Tampa
Washington, D.C.

The second Griffin's Invoice, number 118011 covers materials and labor to install water service for the fume scrubber that is part of the sludge dryer system. This $14,299.00 invoice, however, also includes other water piping work undertaken in the shop, so the entire amount of this invoice does not relate to the sludge dryer. C&R estimates that between one-fourth and one-half of this invoice, or between $3,574.75 and $7,149.50, relates to the sludge dryer installation.

The third Griffin's Invoice, number 118240 covers materials and labor totaling $7,281.34 to install air lines for the sludge dryer. The total paid to Griffin's in connection with the SEP, using only one-fourth of the water piping invoice, is at least $17,265.25.

Tab 3 Invoice from Brown Machine for $525.00 to repair a blower wheel that was found to require repair during the shakedown period.

Tab 4 Tab 4 contains three invoices from LC Electric. The first invoice totals $962.84 for labor and materials to wire the sludge dryer in to the shop electrical system. During startup, problems were found with the sludge dryer that required additional work from LC Electric. The second invoice totals $415.50 for labor and materials to replace and rewire four motors that were found to be defective during startup. The third invoice totals $628.00 for labor and materials to replace a motor controller in the sludge dryer which was found to be defective during startup. Mid Kansas Winding's invoice totaling $1,738.00 for two Leeson motors that were found to be required during the startup and shakedown of the sludge dryer.

Tab 5 The above costs are summarized as follows:

Lanco Corporation	$22,500.00
Griffin's	$17,265.25 to $20,840.00
Brown Machine	$ 525.00
LC Electric	$ 1,955.84
Total to outside suppliers	**$44,034.59 to $47,609.74**

Additional (in-house) costs. In addition to paying at least $44,034.59 to the contractors and suppliers described above, C&R incurred significant in-house costs. For C&R's inside cost calculations below, C&R calculated labor at its typical shop rate of $75.00. These costs include:

Unloading of the sludge dryer	$ 250.00
Installation of venting	$ 750.00
Venting pipe	$ 500.00
Shakedown and training	$10,500.00
Total	**$12,000.00**

Accordingly, the total cost to C&R of the installation, startup and shakedown of the sludge dryer is **$56,034.59** to **$59,609.74**.

Waste reduction and hazardous waste generation. The anticipated waste reduction from use of the sludge dryer was approximately four-to-one. The actual waste reduction has been approximately five-to-one, resulting in a significant reduction in amounts of waste that require disposal.

I believe this covers the information called for in this report. Please do not hesitate to contact me if you need additional information or have questions.

Sincerely,

James H. Andreasen

Attachments

cc: Kelley Hickman (via electronic mail – hickman.kelley@epa.gov)
Kevin Cline

TAB 1

LANCO CORPORATION

Invoice

DATE 1/3/2007 **REVISION** _____ **SALESMAN** Randy

SOLD TO:

C & R Plating
1120 E. 10th St.
Minneapolis, KS 67467

PHONE 785-392-2626
FAX 785-392-3344
CONTACT Mr. Kevin Cline

QTY.	DESCRIPTION	INV #	PRICE	TOTAL
1	180G JWI Sludge Dryer	SL1015	$22,500.00	$22,500.00
	Serial Number JC0208			
	Natural Gas Fired			
	Total Investment			$22,500.00

TAB 2

GRIFFIN'S
HEATING - AIR - ELECTRICAL - PLUMBING - GENERAL CONSTRUCTION

GRIFFIN'S CONTRACTING, INC.
703 E TENTH ST
P O BOX 313
MINNEAPOLIS, KS 67467

Invoice

Date	Invoice #
8/30/2006	117652

PAID

Bill To	Ship To
C & R PLATING 320 E 10TH ST MINNEAPOLIS, KS 67467	C & R PLATING 320 E 10TH ST MINNEAPOLIS, KS 67467

P.O. Number	Terms	Due Date	Ship	Project
	Due on receipt	8/30/2006	8/30/2006	

Quantity	Item Code	Description	Price Each	Amount
2	MISC	20 FT. LENGTHS 2 X 1 X 14G STEEL	35.25	70.50
1	BK 20091	2" BLACK 90 ST ELBOW	12.29	12.29
1	MISC	2" IRON BODY GAS COCK	60.40	60.40
1	BK 20065	2" BLACK UNION	11.84	11.84
2	BK 20076	2" X 4" BLACK NIPPLE	5.28	10.56
2	BK 20077	2" X 4 1/2" BLACK NIPPLE	5.94	11.88
3	BK 20090	2" BLACK 90 ELBOW	7.03	21.09
3	BK 20050	2" BLACK TEE	9.71	29.13
1	MISC	2" X 2" X 1" BLACK TEE	18.73	18.73
2	BK 20010	2" BLACK CAP	3.75	7.50
1	BK 20012	2" BLACK PLUG	3.78	3.78
1	MISC	2" X 10" BLACK NIPPLE	27.80	27.80
2	BK 20080	2" X 6" BLACK NIPPLE	5.66	11.32
1	BK 20001	2" X 1 1/2" BLACK RED COUPLING	5.74	5.74
1	BK 15001	1 1/2" X 1 1/4" BLACK RED COUPLING	7.26	7.26
1	MISC	1 1/2" ALL THREAD NIPPLE	2.52	2.52
1	BK 12591	1 1/4" BLACK 90 ST ELBOW	7.19	7.19
3	MISC	2" EXTRA HEAVY BLACK COUPLING	27.34	82.02
3	MISC	1" X 6" BLACK NIPPLE	1.91	5.73
1	BK 20002	2" X 1 1/4" BLACK RED COUPLING	6.55	6.55
1	BK 12551	1 1/4" X 1 1/4" X 1" BLACK RED TEE	10.46	10.46
1	MISC	1 1/4" X 1" X 1" BLACK RED TEE	6.00	6.00
4	BK 1050	1" BLACK TEE	2.81	11.24
7	BK 1090	1" BLACK 90 ELBOW	1.88	13.16
5	BK 1091	1" BLACK 90 ST ELBOW	3.63	18.15
1	BK 1010	1" BLACK CAP	2.74	2.74
1	MISC	36' X 3/8" ALL THREAD ROD	12.73	12.73
210	BK 100STP	1" BLACK PIPE	2.59438	544.82

We appreciate the opportunity to serve you.

VISA, M/C, Discover, American Express are accepted for payment on your account.

Subtotal	
Sales Tax (7.3%)	
Total	

GRIFFIN'S
HEATING - AIR - ELECTRICAL - PLUMBING - GENERAL CONSTRUCTION

GRIFFIN'S CONTRACTING, INC.
703 E TENTH ST
P O BOX 313
MINNEAPOLIS, KS 67467

Invoice

Date	Invoice #
8/30/2006	117652

PAID

Bill To	Ship To
C & R PLATING 320 E 10TH ST MINNEAPOLIS, KS 67467	C & R PLATING 320 E 10TH ST MINNEAPOLIS, KS 67467

P.O. Number	Terms	Due Date	Ship	Project
	Due on receipt	8/30/2006	8/30/2006	

Quantity	Item Code	Description	Price Each	Amount
63	BK 125STP	1 1/4" BLACK PIPE	3.39286	213.75
130	BK 200STP	2" BLACK PIPE	5.436	706.68
2	MISC	8' GALVANIZED ANGLE IRON	15.22	30.44
9	MISC	1 1/4" CONDUIT STRAPS	0.37	3.33
1	MISC	PINT OF REAL TUFF PIPE DOPE	21.45	21.45
9	MISC	CAST IRON CEILING PLATES X 3/8" THREAD	1.18	10.62
3	MISC	2" AUTO GRIP PIPE HANGER	0.69	2.07
5	MISC	1" AUTO GRIP PIPE HANGER	0.64	3.20
3	MISC	1" CONDUIT HANGER WITH BOLT	0.64	1.92
2	MISC	RED/WHITE 2" BALL VALVE	49.63	99.26
4	MISC	RED/WHITE 1" BALL VALVE	16.17	64.68
1	MISC	BRASS 1" GAS COCK	25.27	25.27
4	BK 1012	1" BLACK PLUG	1.43	5.72
1	MISC	4' X 1 1/4" B STRUT	12.64	12.64
83.5	NON TAX LABOR	LABOR	50.00	4,175.00

We appreciate the opportunity to serve you.

VISA, M/C, Discover, American Express are accepted for payment on your account.

Subtotal	$6,409.16
Sales Tax (7.3%)	$0.00
Total	$6,409.16

GRIFFIN'S
HEATING - AIR - ELECTRICAL - PLUMBING - GENERAL CONSTRUCTION

GRIFFIN'S CONTRACTING, INC.
703 E TENTH ST
P O BOX 313
MINNEAPOLIS, KS 67467

Invoice

Date	Invoice #
2/13/2007	118011

Bill To	Ship To
C & R PLATING 320 E 10TH ST MINNEAPOLIS, KS 67467	C & R PLATING 320 E 10TH ST MINNEAPOLIS, KS 67467

P.O. Number	Terms	Due Date	Ship	Project
	Due on receipt	2/13/2007	2/13/2007	

Quantity	Item Code	Description	Price Each	Amount
40	MISC	1" L COPPER	4.83075	193.23
500	MISC	2" L COPPER	11.228	5,614.00
2	MISC	2" PRO PRESS TEE	29.06	58.12
10	MISC	1" BALL VALVE THREADED	12.641	126.41
4	MISC	3/4" BALL VALVE THREADED	8.355	33.42
10	MISC	2" X 2" X 1" PROPRESS TEE	29.89	298.90
4	MISC	2" X 3/4" PROPRESS REDUCER	15.8775	63.51
20	MISC	2" PROPRESS COUPLING	12.005	240.10
2	MISC	2" COPPER X IP MALE PROPRESS	31.90	63.80
20	MISC	1" COPPER X IP MALE PROPRESS	5.39	107.80
24	MISC	2" COPPER 90 ELBOW PROPRESS	26.55833	637.40
4	MISC	2" COPPER 90 STREET ELBOW PROPRESS	26.755	107.02
4	MISC	1" IRON PLUG	3.20	12.80
2	MISC	3/4" IRON PLUG	3.20	6.40
500	MISC	FT. OF 2 1/8" SLIP JOINT INSULATION	3.85	1,925.00
30	MISC	2 1/8" SLIP JOINT ELBOW COVERS	3.08	92.40
2	MISC	ROLLS OF VINYL INSULATION TAPE	12.30	24.60
	MISC	OVERSIZED SJ INSULATION FOR TEES.....N/C	0.00	0.00T
40	MISC	FT. OF 4" PVC PIPE FOR INSULATION SLEEVES	3.86	154.40
20	MISC	4" PIPE STRAPS	2.40	48.00
	MISC	WIRE TIES (EXTRA HEAVY)	30.00	30.00
	MISC	MISC. BOLTS, SAND CLOTH, OFFSET HANGERS	50.00	50.00
4	MISC	3/4" COPPER X IP MALE PROPRESS	2.94	11.76
20	MISC	1" COPPER 90 ELBOW SWEAT	4.0015	80.03
	MISC	PROPRESS TOOLS.....NO CHARGE	0.00	0.00
	NON TAX LABOR	LABOR	4,320.00	4,320.00

We appreciate the opportunity to serve you.

VISA, M/C, Discover, American Express are accepted for payment on your account.

Subtotal	$14,299.10
Sales Tax (7.3%)	$0.00
Total	$14,299.10

This is for hot water line ran to the plating line.

GRIFFIN'S
HEATING - AIR - ELECTRICAL - PLUMBING - GENERAL CONSTRUCTION

GRIFFIN'S CONTRACTING, INC.
703 E TENTH ST
P O BOX 313
MINNEAPOLIS, KS 67467

Invoice

Date	Invoice #
3/2/2007	118240

Bill To	Ship To
C & R PLATING 320 E 10TH ST MINNEAPOLIS, KS 67467	C & R PLATING 320 E 10TH ST MINNEAPOLIS, KS 67467

P.O. Number	Terms	Due Date	Ship	Project
	Due on receipt	3/2/2007	3/2/2007	

Quantity	Item Code	Description	Price Each	Amount
360	PVC 200PLP40	2" PVC SCH80 PIPE	2.54	914.40
100	PVC 100PLP80	1" PVC SCH80 PIPE	1.18	118.00
8	MISC	2" X 2" X 1" PVC SCH. 80 TEE	22.97	183.76
10	MISC	2" PVC SCH. 80 COUPLING	5.81	58.10
10	MISC	2" PVC SCH. 80 X IP MALE	20.54	205.40
14	MISC	2" PVC SCH. 80 90 DEGREE ELBOW	7.48	104.72
6	MISC	2" PVC SCH. 80 TEE	26.62	159.72
18	MISC	1" PVC SCH. 80 TEE	7.34	132.12
24	MISC	1" PVC X 1/2" THREAD BUSHING	1.28	30.72
8	MISC	1" PVC SCH. 80 CAP	6.59	52.72
6	MISC	2" BALL VALVES	39.34	236.04
24	MISC	1/2" BALL VALVES	9.25	222.00
24	MISC	1/2" X 3" BRASS NIPPLES	4.24	101.76
8	MISC	6 FT. LONG PIECES OF PERFORATED ANGLE IRON	15.00	120.00
36	MISC	PIPE HANGER PLATES	1.31	47.16
30	MISC	3/8" REDI ROD	1.79	53.70
30	MISC	1" AUTO GRIP HANGERS	0.68	20.40
10	MISC	2" AUTO GRIP HANGERS	0.80	8.00
40	MISC	2-HOLE RIGID CONDUIT STRAPS	0.66	26.40
12	MISC	BEAM CLAMP WITH 3/8" ROD HOLE	3.00	36.00
	MISC	NUTS, BOLTS, SCREWS, ETC.	30.00	30.00
	MISC	MISC. MATERIAL, DRILL BITS, ETC.	100.00	100.00
6	MISC	PINTS OF PVC GLUE	14.19	85.14
6	MISC	PINTS OF PURPLE CLEANER	9.02	54.12
	MISC	LESS	-279.04	-279.04
	NON TAX LABOR	LABOR	4,460.00	4,460.00
		THIS IS INVOICE FOR AIR LINE INSTALLATION		

We appreciate the opportunity to serve you.

VISA, M/C, Discover, American Express are accepted for payment on your account.

Subtotal	$7,281.34
Sales Tax (7.3%)	$0.00
Total	$7,281.34

TAB 3

BROWN MACHINE
204 S. 2nd Ave.
Minneapolis, KS 67467
Phone 785-392-2828
FAX 785-392-6070

INVOICE

№ 003569

Bill To: C & R

Date: 2-5-07

P.O. #	Part #	Quantity	Description	Unit Price	Amount
		15 hrs	machine Blower Wheel Repair Shaft & asemble	35.00	525.00

We appreciate your business!

Total $525.00

TAB 4

LC Electric

729 e 7th Minneapolis,ks

INVOICE

DATE:2/1/07

SOLD TO:	C&R PLATING

DESC. OF WORK:			
Wire equipent into main panel			

PARTS:	576.82
LABOR:	386.02
TOTAL:	962.84

THANK YOU FOR YOUR BUSINESS.

LC Electric

729 e 7th Minneapolis,ks

INVOICE

DATE:2/13/07

SOLD TO:	C&R PLATING

DESC. OF WORK:			
Replace and rewire 4 electric motors on sludge dryer			

PARTS:	40
LABOR:	325.5
TOTAL:	415.5

THANK YOU FOR YOUR BUSINESS.

LC Electric

729 e 7th Minneapolis,ks

INVOICE

DATE:2/13/07

SOLD TO:	C&R PLATING

DESC. OF WORK:			
Replace motor controler in equipment			

PARTS: 426

LABOR: 202

TOTAL: 628

THANK YOU FOR YOUR BUSINESS.

TAB 5

Mid Kansas Winding

Invoice

Date	Invoice #
4/23/2007	20000

Bill To
C & R Plating 1120 E. 10th St. Minniapolis, KS. 67467

	Description	Amount
Leeson, Cat# 108019, 3/4 hp		1,394.00
Leeson Cat# 110112, 1 hp		344.00
Sales Tax		0.00
	Total	$1,738.00