June 16, 2006

456825

RCRA RECORDS

Kori Kuehl, ARTD/RESP
U.S. Environmental Protection Agency
901 N 5th Street
Kansas City, KS 66101

RE: Request for Information from C&R Plating, Minneapolis, Kansas

Dear Ms. Kuehl:

This letter provides responses to the June 1, 2006 letter from Donald Toensing requesting additional information about the violation cited during the February 7, 2006 RCRA inspection. The violation was failure to make a hazardous waste determination on multiple waste streams. These waste streams include:

No Chrome Tank sludge

- 1a Caustic Soda Tank Sludge
- 1b Muratic Acid Tank Sludge
- 1c Waste Water Treatment Plant Sludge
- 1d Floor Debris
- 1e Rhino Flush Paint Gun Cleaning Waste

Request for information #1 re: Violations 1a, 1b, 1c
Copies of the complete analytical results requested are included as attachments #1, 2, and 3.

Request for information #2 re: 1d Floor Debris
In response to violation 1d, the management at C&R Plating has placed several small waste receptacles at strategic locations where non-hazardous waste is generated. Staff has been instructed to use the receptacles and empty them into trash bins as soon as they are full to eliminate trash on the floor. Floor debris now mainly consists of dust and not trash. A conscious effort is being made to sweep floors more often.

Request for information #3 re: Rhino Flush Paint Gun Cleaning Waste
The MSDS for the RhinoFlush is enclosed as attachment #4.

Request for information #4 re: Waste Streams Management
Waste streams are managed as follows:

1) The caustic soda tank sludge is treated by the on-site waste treatment system.
2) The muratic acid tank sludge is treated by the on-site waste treatment system.
3) The waste treatment plant press sludge is being managed as a hazardous waste (see response to Request for information #5).
4) The floor debris has been determined to be non-hazardous and is placed in waste receptacles then transported to a sanitary landfill by Minneapolis Refuse Service.
5) The experimental plating line has been eliminated and removed.

REC'D
JUN 19 2006
RESP

6) The Rhino Flush Paint Gun Cleaning Waste has been determined to be non-hazardous. It is mixed with kitty litter or floor dry to solidify it and is disposed of in the sanitary landfill.

Request for information #5 re: Management of the Waste Water Treatment Plant Sludge
It has been determined that the sludge produced from the filter press is hazardous due to chromium and must be treated as a RCRA hazardous waste. It is being removed from the filter press and is placed in a 55 gallon barrel. It is labeled as "Hazardous Waste" and dated with the accumulation start date. When a barrel is filled, the lid is secured, and the barrel is moved to the designated on-site storage area with in 72 hours. Weekly inspections are being done at the hazardous waste storage area to assess for any storage problems. EMA, St Louis, a licensed hazardous waste transporter ships the barrels under a hazardous waste manifest within 90 days of filling to a permanent hazardous waste storage facility. The original manifest and the returned copy is stapled and filed together, and will be kept for at least 3 years. C&R Plating plans to sample and test waste water treatment sludge at least annually as long as plating processes do not change. Waste water is not hazardous and is discharged to the local public owned treatment works (POTW). Waste water is tested quarterly to ensure it meets city standards. If waste water is found to be out of compliance, the city of Minneapolis and KDHE will be notified. The management and staff will assess production plating lines to determine the cause of the noncompliance. No waste water will be discharged until the problem is solved. The waste water will be retested to ensure the problem has been corrected.

Request for Information #6 re: Consultants
C&R Plating has consulted with the KDHE, EMA (hazardous waste transporter) and Kansas State University's Small Business Environmental Assistance Program since the February visit. The only written correspondence is from Sherry Davis, K-State's SBEAP and is included as attachment #5.

Kevin Cline

Kevin Cline
C&R Plating

Continental
Analytical Services, Inc.

02/16/2006

Attachment #1

C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Date Received: 02/08/2006
Continental File No.: 5822
Continental Order No.: 17163

Dear Mr. Cline:

This laboratory report consisting of 6 pages contains the analytical results for the following samples:

CAS LAB ID #	SAMPLE DESCRIPTION	SAMPLE TYPE	DATE SAMPLED
06020494	SOAP Sludge	Sludge	2/8/2006

Continental is accredited by the State of Kansas through the National Environmental Laboratory Accreditation Program (NELAP). The results contained in this report were obtained using Continental's Standard Operating Procedures. These procedures are in substantial compliance with the approved methods referenced and the standards published by NELAP unless otherwise noted in the Appendix and Quality Control sections of this report.

The Appendix and Quality Control sections are an integral part of this report and may contain important data qualifiers. The chain of custody and sample receipt form are also included as attachments to this report.

All results are reported on a wet weight basis unless otherwise stated.

Samples will be retained for thirty days unless Continental is otherwise notified.

Thank you for choosing Continental for this project. If you have any questions please contact me at (800)535-3076.

This report may not be reproduced, except in full, without written approval from Continental Analytical Services, Inc.

CONTINENTAL ANALYTICAL SERVICES, INC.

Clifford J. Baker
Technical Manager

Brian T. O'Donnell
Project Manager

P.O. Box 3737 - 525 N. Eighth St. - Salina, KS 67402-3737
785-827-1273 800-535-3076 Fax 785-823-7830
KDHE Environmental Laboratory Accreditation No. E-10146

Continental Analytical Services, Inc.

Client: C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Date Sample Rptd: 02/16/2006
Date Sample Recd: 02/08/2006
Continental File No: 5822
Continental Order No: 17163

Lab Number: 06020494
Sample Description: SOAP Sludge

Date Sampled: 02/08/2006
Time Sampled:

Analysis	Concentration	Units	Book/Page
Arsenic, TCLP	0.10	mg/L	6085/6
Barium, TCLP	ND(1.0)	mg/L	6085/6
Cadmium, TCLP	0.30	mg/L	6085/6
Chromium, TCLP	13.7	mg/L	6085/6
Lead, TCLP	ND(0.05)	mg/L	6085/6
Selenium, TCLP	ND(0.10)	mg/L	6085/6
Silver, TCLP	0.40	mg/L	6085/6

Analysis	Date Prepared	Date Analyzed	QC Batch	Inst. Batch	Analyst	Method(s)
Arsenic, TCLP	02/15/2006	02/15/2006	060215-3	2IP2046	MAG	6010B
Barium, TCLP	02/15/2006	02/15/2006	060215-3	2IP2046	MAG	6010B
Cadmium, TCLP	02/15/2006	02/15/2006	060215-3	2IP2046	MAG	6010B
Chromium, TCLP	02/15/2006	02/15/2006	060215-3	2IP2046	MAG	6010B
Lead, TCLP	02/15/2006	02/15/2006	060215-3	2IP2046	MAG	6010B
Selenium, TCLP	02/15/2006	02/15/2006	060215-3	2IP2046	MAG	6010B
Silver, TCLP	02/15/2006	02/15/2006	060215-3	2IP2046	MAG	6010B
TCLP Preparation	02/14/2006		060214-2		CRD	1311
ICP Metals TCLP Preparation Method						3051

Conclusion of Lab Number: 06020494

ND(), where noted, indicates none detected with the reporting limit in parentheses.

APPENDIX

Client: C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Date Sample Rptd: 02/16/2006
Date Sample Recd: 02/08/2006
Continental File No: 5822
Continental Order No: 17163

Preservation by cooling is not required for analyses on this Continental Order.

No analysis with a holding time of seventy-two hours or less was performed in this Continental order.

-Conclusion of Laboratory Report-

Continental Analytical Services, Inc.

Client: C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Quality Control Report
Batch Summary

Date Reported: 02/16/2006
Date Sample Received: 02/08/2006
Continental File No: 5822
Continental Order No: 17163

Test	Testname	QC Batch	Method Blank	LCS	MS Lab No.
SL702	Arsenic, TCLP	060215-3	060215BLK3	060215LCS3	06020496MS
SL703	Barium, TCLP	060215-3	060215BLK3	060215LCS3	06020496MS
SL706	Cadmium, TCLP	060215-3	060215BLK3	060215LCS3	06020496MS
SL708	Chromium, TCLP	060215-3	060215BLK3	060215LCS3	06020496MS
SL728	Lead, TCLP	060215-3	060215BLK3	060215LCS3	06020496MS
SL750	Selenium, TCLP	060215-3	060215BLK3	060215LCS3	06020496MS
SL753	Silver, TCLP	060215-3	060215BLK3	060215LCS3	06020496MS

Lab numbers associated with this batch:
06020494

SL601	TCLP Prep	060214-2	060214BLK2

Lab numbers associated with this batch:
06020494

- Quality Control Report Continued -

Quality Control Report
Method Blank, LCS, MS/MSD Data

Client: C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Date Reported: 02/16/2006
Date Sample Received: 02/08/2006
Continental File No: 5822
Continental Order No: 17163

Analysis	Blank Data	% Rec LCS	Limits	Spike Level	Units	Spiked Sample (% Recovery) MS	MSD	Limits	Spike Level	Units	Spiked Sample Precision Data RPD	Limit
QC Batch: 060215-3	For samples prepared on: 02/15/2006					Spiked sample: 06020496						
Arsenic, TCLP	ND(0.10)	101	90.9-107	5.0	mg/L	MN	MN	91.6-108	5.0	mg/L	**	4.1
Barium, TCLP	ND(1.0)	104	93.6-110	5.0	mg/L	MN	MN	92.2-111	5.0	mg/L	**	5.1
Cadmium, TCLP	ND(0.03)	97.8	89.6-106	5.0	mg/L	MN	MN	88.4-106	5.0	mg/L	**	4.4
Chromium, TCLP	ND(0.10)	102	89.6-109	5.0	mg/L	MN	MN	87.3-111	5.0	mg/L	**	6.2
Lead, TCLP	ND(0.05)	98.1	88.9-108	5.0	mg/L	MN	MN	88.6-107	5.0	mg/L	**	4.4
Selenium, TCLP	ND(0.10)	97.0	85.1-106	5.0	mg/L	MN	MN	84.3-107	5.0	mg/L	**	5.2
Silver, TCLP	ND(0.10)	102	92.5-110	1.0	mg/L	MN	MN	93.5-112	1.0	mg/L	**	4.0

Data Qualifiers:

MN - The MS/MSD sample analyses were not performed on a sample from this Continental order number.

** - RPD cannot be calculated.

-Conclusion Quality Control Report-

Quality Control Report
Continuing Calibration Verification Data Summary

Client: C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Date Reported: 02/16/2006
Date Sample Received: 02/08/200
Continental File No: 5822
Continental Order No: 17163

Analysis	Date of Analysis	Instrument Batch ID	Amount in Standard	Amount Detected	Units	Percent Recovery
Barium	02/15/2006	No data qualifiers present for this analysis.				
Chromium	02/15/2006	No data qualifiers present for this analysis.				

- Quality Control Report Conclusion -

Continental Analytical Services, Inc.

Attachment #2

Client: C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Date Sample Rptd: 02/16/2006
Date Sample Recd: 02/10/2006
Continental File No: 5822
Continental Order No: 17227

Lab Number: 06020727
Sample Description: Acid Sludge

Date Sampled: 02/09/2006
Time Sampled:

Analysis	Concentration	Units	Book/Page
Arsenic, TCLP	ND(0.10)	mg/L	6085/6
Barium, TCLP	ND(1.0)	mg/L	6085/6
Cadmium, TCLP	0.10	mg/L	6085/6
Chromium, TCLP	0.80	mg/L	6085/6
Lead, TCLP	0.15	mg/L	6085/6
Selenium, TCLP	ND(0.10)	mg/L	6085/6
Silver, TCLP	ND(0.10)	mg/L	6085/6

Analysis	Date Prepared	Date Analyzed	QC Batch	Inst. Batch	Analyst	Method(s)
Arsenic, TCLP	02/15/2006	02/15/2006	060215-2	2IP2046	MAG	6010B
Barium, TCLP	02/15/2006	02/15/2006	060215-2	2IP2046	MAG	6010B
Cadmium, TCLP	02/15/2006	02/15/2006	060215-2	2IP2046	MAG	6010B
Chromium, TCLP	02/15/2006	02/15/2006	060215-2	2IP2046	MAG	6010B
Lead, TCLP	02/15/2006	02/15/2006	060215-2	2IP2046	MAG	6010B
Selenium, TCLP	02/15/2006	02/15/2006	060215-2	2IP2046	MAG	6010B
Silver, TCLP	02/15/2006	02/15/2006	060215-2	2IP2046	MAG	6010B
TCLP Preparation	02/14/2006		060214-1		CRD	1311
ICP Metals TCLP Preparation Method						3051

Conclusion of Lab Number: 06020727

ND(), where noted, indicates none detected with the reporting limit in parentheses.

Quality Control Report
Method Blank, LCS, MS/MSD Data

Client: C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Date Reported: 02/16/2006
Date Sample Received: 02/10/2006
Continental File No: 5822
Continental Order No: 17227

Analysis	Blank Data	% Rec LCS	Limits	Spike Level	Units	Spiked Sample (% Recovery) MS	MSD	Limits	Spike Level	Units	Spiked Sample Precision Data RPD	Limit
QC Batch: 060215-2	For samples prepared on: 02/15/2006					Spiked sample: 06020727+						
Arsenic, TCLP	ND(0.10)	100	90.9-107	5.0	mg/L	99.6	98.5	91.6-108	5.0	mg/L	1.1	4.1
Barium, TCLP	ND(1.0)	101	93.6-110	5.0	mg/L	101	101	92.2-111	5.0	mg/L	0.0	5.1
Cadmium, TCLP	ND(0.03)	99.4	89.6-106	5.0	mg/L	99.8	97.3	88.4-106	5.0	mg/L	2.5	4.4
Chromium, TCLP	ND(0.10)	100	89.6-109	5.0	mg/L	102	101	87.3-111	5.0	mg/L	1.0	6.2
Lead, TCLP	ND(0.05)	99.7	88.9-108	5.0	mg/L	100	99.1	88.6-107	5.0	mg/L	0.9	4.4
Selenium, TCLP	ND(0.10)	98.4	85.1-106	5.0	mg/L	99.8	97.9	84.3-107	5.0	mg/L	1.9	5.2
Silver, TCLP	ND(0.10)	102	92.5-110	1.0	mg/L	103	101	93.5-112	1.0	mg/L	2.0	4.0

+ - The MS/MSD sample analyses were performed on this sample from this Continental order number.

-Conclusion Quality Control Report-

Quality Control Report
Continuing Calibration Verification Data Summary

Client: C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Date Reported: 02/16/2006
Date Sample Received: 02/10/2006
Continental File No: 5822
Continental Order No: 17227

Analysis	Date of Analysis	Instrument Batch ID	Amount in Standard	Amount Detected	Units	Percent Recovery
Barium	02/15/2006	No data qualifiers present for this analysis.				
Chromium	02/15/2006	No data qualifiers present for this analysis.				

- Quality Control Report Conclusion -

Continental Analytical Services, Inc.
525 N. 8th Street, Salina, KS 67401
(785)827-1273 (800)535-3076 Fax (785)823-7830
www.cas-lab.com

CHAIN OF CUSTODY RECORD

Continental Shipping Order Number: 17227

Form 02/10/06

Client/Reporting Information	Invoice Information
Company Name: C+R Plating	Company Name:
Address:	Address:
City: State: Zip:	City: State: Zip:
Contact: Bevin E-mail:	Contact: E-mail:
Phone Number: Fax Number:	Phone Number: Fax Number:

Sampler's Name:(Printed) | Sampler's Name:(Signature) | Purchase Order Number:

Project Number: | Project Name:

SAMPLE IDENTIFICATION (30 Characters or less)	Matrix (Sample Type)	Regulatory Program	Date Sampled	Time Sampled	C-Composite G-Grab	Total Containers	Number of Preserved Bottles: HCL	NaOH	HNO3	H2SO4	NONE	OTHER:	PARAMETERS/CONTAINER TYPE: TCLP Metals - NO Hg	COMMENTS
Acid Sludge			02/09/06										X	Need Results by 2/15/06

Discrepancies See C/S RF 2-10-06

Regulatory Program: N=NPDES, R=RCRA, D=Drinking Water, SL=503 Sludge, O=Other

(Please note if non-standard turnaround. Rush & Emergency subject to additional charge)
Standard TAT: (15 working days) Rush TAT: (5 working days) Emergency TAT: (3 working days)

Matrix (Sample Type): DW=Drinking Water, GW=Ground Water, WW=Waste Water, W=Wipe, S=Solid/Soil, SL=Sludge, A=Air, OL = Oil/Organic Liquid, O=Other

RELINQUISHED BY:	DATE:	TIME:	RECEIVED BY:	DATE:	TIME:
RELINQUISHED BY:	DATE:	TIME:	RECEIVED BY:	DATE:	TIME:
RECEIVED AT LAB BY:	DATE: 2-10-06	TIME: 1045	SHIPPED VIA: AIRBILL:	SEAL #: SEAL DATE:	

COC/MISC1.XLS/BLANK/4/29/2004

Continental Analytical Services, Inc.
Cooler / Sample Receipt Form

File No.: SE22 Order No.: (7227)
Date/Time Received: 2/10/06 10:45

Client Name: C&R Plating
Sample ID: See COC

Cooler Identification: CAS Cooler #:_____/Client's Cooler/Box/Letter/Hand Delivered
Other _____

Cooler Size: Small / Medium / Large / NA

Delivered By: UPS/FedX/DHL/ASAP/Land Air Exp/Field Svcs/Mail/Walk-In/Other_____
Air Bill Number: _____

Custody Seal: Present (Intact or Broken) Absent Seal No: _____
Seal Name: _____ Seal Date: _____
Seal matches Chain of Custody: Yes / No / NA

Type of Packing Material: Blue Ice/Ice/Bubble/Foam/Paper/Peanuts/Vermiculite/NA

Cooler Temperature (°C): Original Reading 23 °C Corrected Reading 21-25 °C
Temp. By: Temp. Blank _____ Poured _____ Surface G P M
Thermo. ID No.: 154 Thermo. Correction Factor (°C): ±2

Sample Receipt Discrepancies: ☐ No ☒ Yes (See detail below)

- ☐ Chain of Custody not present
  - ☐ Information obtained from: Purchase Order/Letter received with samples
- ☐ Container label absent
- ☒ Chain of Custody incomplete
  - ☒ Chain of Custody missing time sampled
    - ☐ Time sampled obtained from container label
  - ☐ Chain of Custody missing date sampled
    - ☐ Date sampled obtained from container label
- ☐ Sample excluded from Chain of Custody:
- ☐ Broken or Leaking Containers:
- ☐ Sample listed on Chain of Custody, not received:
- ☐ Sample description on container label different from Chain of Custody:
- ☐ Air bubbles in VOA vials: _____

Completed By: PC Detailed Description/Comments: no relinquished signature

Did CAS inform client regarding receipt conditions? Yes / No
How Informed: Phone / Fax / Mail / E-mail
Who was contacted: Kevin
Temperature Authorization on file?: Yes / No
Sent Test Assignment Review Sheets? Yes / No
Remarks:

Reviewed by: JML Date: 02/10/06

Continental
Analytical Services, Inc.

02/16/2006

Attachment #3

C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Date Received: 02/08/2006
Continental File No.: 5822
Continental Order No.: 17164

Dear Mr. Cline:

This laboratory report consisting of 6 pages contains the analytical results for the following samples:

CAS LAB ID #	SAMPLE DESCRIPTION	SAMPLE TYPE	DATE SAMPLED
06020495	Filter Press	Solid	2/8/2006

Continental is accredited by the State of Kansas through the National Environmental Laboratory Accreditation Program (NELAP). The results contained in this report were obtained using Continental's Standard Operating Procedures. These procedures are in substantial compliance with the approved methods referenced and the standards published by NELAP unless otherwise noted in the Appendix and Quality Control sections of this report.

The Appendix and Quality Control sections are an integral part of this report and may contain important data qualifiers. The chain of custody and sample receipt form are also included as attachments to this report.

All results are reported on a wet weight basis unless otherwise stated.

Samples will be retained for thirty days unless Continental is otherwise notified.

Thank you for choosing Continental for this project. If you have any questions please contact me at (800)535-3076.

This report may not be reproduced, except in full, without written approval from Continental Analytical Services, Inc.

CONTINENTAL ANALYTICAL SERVICES, INC.

Clifford J. Baker
Technical Manager

Brian T. O'Donnell
Project Manager

P.O. Box 3737 - 525 N. Eighth St. - Salina, KS 67402-3737
785-827-1273 800-535-3076 Fax 785-823-7830
KDHE Environmental Laboratory Accreditation No. E-10146

Continental Analytical Services, Inc.

Client: C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Date Sample Rptd: 02/16/2006
Date Sample Recd: 02/08/2006
Continental File No: 5822
Continental Order No: 17164

Lab Number: 06020495
Sample Description: Filter Press

Date Sampled: 02/08/2006
Time Sampled:

Analysis	Concentration	Units	Book/Page
Arsenic, TCLP	ND(0.10)	mg/L	6085/6
Barium, TCLP	ND(1.0)	mg/L	6085/6
Cadmium, TCLP	0.74	mg/L	6085/6
Chromium, TCLP	110.	mg/L	6085/6
Lead, TCLP	0.70	mg/L	6085/6
Selenium, TCLP	ND(0.10)	mg/L	6085/6
Silver, TCLP	ND(0.10)	mg/L	6085/6

Analysis	Date Prepared	Date Analyzed	QC Batch	Inst. Batch	Analyst	Method(s)
Arsenic, TCLP	02/15/2006	02/15/2006	060215-3	2IP2046	MAG	6010B
Barium, TCLP	02/15/2006	02/15/2006	060215-3	2IP2046	MAG	6010B
Cadmium, TCLP	02/15/2006	02/15/2006	060215-3	2IP2046	MAG	6010B
Chromium, TCLP	02/15/2006	02/15/2006	060215-3	2IP2046	MAG	6010B
Lead, TCLP	02/15/2006	02/15/2006	060215-3	2IP2046	MAG	6010B
Selenium, TCLP	02/15/2006	02/15/2006	060215-3	2IP2046	MAG	6010B
Silver, TCLP	02/15/2006	02/15/2006	060215-3	2IP2046	MAG	6010B
TCLP Preparation	02/14/2006		060214-2		CRD	1311
ICP Metals TCLP Preparation Method						3051

Conclusion of Lab Number: 06020495

ND(), where noted, indicates none detected with the reporting limit in parentheses.

APPENDIX

Client: C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Date Sample Rptd: 02/16/2006
Date Sample Recd: 02/08/2006
Continental File No: 5822
Continental Order No: 17164

Preservation by cooling is not required for analyses on this Continental Order.

No analysis with a holding time of seventy-two hours or less was performed in this Continental order.

-Conclusion of Laboratory Report-

Continental Analytical Services, Inc.

Client: C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Quality Control Report
Batch Summary

Date Reported: 02/16/2006
Date Sample Received: 02/08/2006
Continental File No: 5822
Continental Order No: 17164

Test	Testname	QC Batch	Method Blank	LCS	MS Lab No.
SL702	Arsenic, TCLP	060215-3	060215BLK3	060215LCS3	06020496MS
SL703	Barium, TCLP	060215-3	060215BLK3	060215LCS3	06020496MS
SL706	Cadmium, TCLP	060215-3	060215BLK3	060215LCS3	06020496MS
SL708	Chromium, TCLP	060215-3	060215BLK3	060215LCS3	06020496MS
SL728	Lead, TCLP	060215-3	060215BLK3	060215LCS3	06020496MS
SL750	Selenium, TCLP	060215-3	060215BLK3	060215LCS3	06020496MS
SL753	Silver, TCLP	060215-3	060215BLK3	060215LCS3	06020496MS

Lab numbers associated with this batch:
06020495

SL601	TCLP Prep	060214-2	060214BLK2

Lab numbers associated with this batch:
06020495

- Quality Control Report Continued -

Quality Control Report
Method Blank, LCS, MS/MSD Data

Client: C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Date Reported: 02/16/2006
Date Sample Received: 02/08/2006
Continental File No: 5822
Continental Order No: 17164

Analysis	Blank Data	% Rec LCS	Limits	Spike Level	Units	Spiked Sample (% Recovery) MS	MSD	Limits	Spike Level	Units	Spiked Sample Precision Data RPD	Limit
QC Batch: 060215-3	For samples prepared on: 02/15/2006					Spiked sample: 06020496						
Arsenic, TCLP	ND(0.10)	101	90.9-107	5.0	mg/L	MN	MN	91.6-108	5.0	mg/L	**	4.1
Barium, TCLP	ND(1.0)	104	93.6-110	5.0	mg/L	MN	MN	92.2-111	5.0	mg/L	**	5.1
Cadmium, TCLP	ND(0.03)	97.8	89.6-106	5.0	mg/L	MN	MN	88.4-106	5.0	mg/L	**	4.4
Chromium, TCLP	ND(0.10)	102	89.6-109	5.0	mg/L	MN	MN	87.3-111	5.0	mg/L	**	6.2
Lead, TCLP	ND(0.05)	98.1	88.9-108	5.0	mg/L	MN	MN	88.6-107	5.0	mg/L	**	4.4
Selenium, TCLP	ND(0.10)	97.0	85.1-106	5.0	mg/L	MN	MN	84.3-107	5.0	mg/L	**	5.2
Silver, TCLP	ND(0.10)	102	92.5-110	1.0	mg/L	MN	MN	93.5-112	1.0	mg/L	**	4.0

Data Qualifiers:
MN - The MS/MSD sample analyses were not performed on a sample from this Continental order number.
** - RPD cannot be calculated.

-Conclusion Quality Control Report-

Continental Analytical Services, Inc.
Cooler / Sample Receipt Form

File No.: 5822 Order No.: 17164
Date/Time Received: 2/8/06 11:02

Client Name: C&R
Sample ID: See COC

Cooler Identification: CAS Cooler #:_____/Client's Cooler/Box/Letter/Hand Delivered
Other _____

Cooler Size: Small / Medium / Large / NA

Delivered By: UPS/FedX/DHL/ASAP/Land Air Exp/Field Svcs/Mail/Walk-In/Other_____
Air Bill Number: _____

Custody Seal: Present (Intact or Broken) Absent Seal No: _____
Seal Name: _____ Seal Date: _____
Seal matches Chain of Custody: Yes / No / NA

Type of Packing Material: Blue Ice/Ice/Bubble/Foam/Paper/Peanuts/Vermiculite/NA

Cooler Temperature (°C): Original Reading 23 °C Corrected Reading 21-25 °C
Temp. By: Temp. Blank _____ Poured _____ Surface G P M
Thermo. ID No.: 154 Thermo. Correction Factor (°C): +2

Sample Receipt Discrepancies: ☐ No ☒ Yes (See detail below)

- ☐ Chain of Custody not present
  - ☐ Information obtained from: Purchase Order/Letter received with samples
- ☐ Container label absent
- ☒ Chain of Custody incomplete
  - ☒ Chain of Custody missing time sampled
    - ☐ Time sampled obtained from container label
  - ☐ Chain of Custody missing date sampled
    - ☐ Date sampled obtained from container label
- ☐ Sample excluded from Chain of Custody:
- ☐ Broken or Leaking Containers:
- ☐ Sample listed on Chain of Custody, not received:
- ☐ Sample description on container label different from Chain of Custody:
- ☐ Air bubbles in VOA vials: _____

Completed By: [signature] Detailed Description/Comments: _____

Did CAS inform client regarding receipt conditions?: Yes / No
How Informed: Phone / Fax / Mail / E-mail
Who was contacted:

Temperature Authorization on file?: Yes / No
Sent Test Assignment Review Sheets?: Yes / No
Remarks:

Reviewed by: [signature] Date: 2/9/06

Quality Control Report
Continuing Calibration Verification Data Summary

Client: C & R Plating
Attn: Kevin Cline
1120 E. 10th Street
Minneapolis, KS 67467

Date Reported: 02/16/2006
Date Sample Received: 02/08/2006
Continental File No: 5822
Continental Order No: 17164

Analysis	Date of Analysis	Instrument Batch ID	Amount in Standard	Amount Detected	Units	Percent Recovery
Barium	02/15/2006	No data qualifiers present for this analysis.				
Chromium	02/15/2006	No data qualifiers present for this analysis.				

- Quality Control Report Conclusion -

Continental Analytical Services, Inc.

525 N. 8th Street, Salina, KS 67401
(785)827-1273 (800)535-3076 Fax (785)823-7830
www.cas-lab.com

CHAIN OF CUSTODY RECORD

Continental Shipping Order Number: 17164 KB 2-9-06

Client/Reporting Information	Invoice Information
Company Name: C&R Plating	Company Name: SAME
Address: 1120 E 10th ST	Address:
City: Minneapolis State: KS Zip: 67467	City: State: Zip:
Contact: Kevin Cline E-mail:	Contact: E-mail:
Phone Number: 785-392-2626 Fax Number: 785-392-3344	Phone Number: Fax Number:
Sampler's Name:(Printed) Kevin Cline Sampler's Name:(Signature) Kevin Cline	Purchase Order Number:
Project Number: Project Name:	

SAMPLE IDENTIFICATION (30 Characters or less)	Matrix (Sample Type)	Regulatory Program	Date Sampled	Time Sampled	C-Composite G-Grab	Total Containers	Number of Preserved Bottles: HCL	NaOH	HNO3	H2SO4	NONE	OTHER:	PARAMETERS/CONTAINER TYPE: TCLP Metals - No Hg	COMMENTS
SOAP Sludge			2-8-06										X	RUSH TAT
Filter press			2-8-06										X	
Filter press-A			2-8-06										X	

Discrepancies See C/S RF

Regulatory Program: N=NPDES, R=RCRA, D=Drinking Water, SL=503 Sludge, O=Other

(Please note if non-standard turnaround. Rush & Emergency subject to additional charge)
Standard TAT: (15 working days) Rush TAT: (5 working days) Emergency TAT: (3 working days)

Matrix (Sample Type): DW=Drinking Water, GW=Ground Water, WW=Waste Water, W=Wipe, S=Solid/Soil, SL=Sludge, A=Air, OL = Oil/Organic Liquid, O=Other

RELINQUISHED BY:	DATE:	TIME:	RECEIVED BY:	DATE:	TIME:
Kevin Cline					
RELINQUISHED BY: Kevin Cline	DATE:	TIME:	RECEIVED BY:	DATE:	TIME:
RECEIVED AT LAB BY: M. Craddock PETRA M. CRADDOCK	DATE: 02/08/06	TIME: 1102	SHIPPED VIA: AIRBILL:	SEAL #: SEAL DATE:	

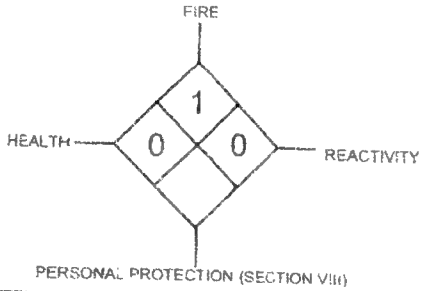
Rhino Linings

Attachment #4

MATERIAL SAFETY DATA SHEET

Part No.: 50010

PRODUCT NAME: RHINOFLUSH



HMIS HAZARD RATING
LEAST---0 SLIGHT---1
MODERATE---2 HIGH---3
EXTREME---4

SECTION 1 - MANUFACTURER IDENTIFICATION

MANUFACTURER'S NAME: Rhino Linings USA, Inc.

ADDRESS: 9151 Rehco Road. San Diego, CA, 92121

INFORMATION PHONE: 858-450-0441

EMERGENCY CONTACT: (CHEMTREC): 800-424-9300

DATE: April 20, 2001

SUPERSEDES: March 21, 1998

SECTION 2 - HAZARDOUS INGREDIENTS

This product is not hazardous as defined in 29 CFR 1910.1200

SECTION 3 – PHYSICAL DATA

Appearance and Odor: Clear liquid, mild odor.
Boiling Point: Greater than 482° F
Vapor Pressure, mmHg: < 0.001 @ 68° F, 1 @ 392° F
Specific Gravity: 0.97 @ 68° F
Specific Gravity of Vapor (1 ATM (Air = 1)): Less than 0.1
Viscosity of Liquid (cSt @ °F): 102 @ 68° F.
Density: 8.1 lbs/gal @ 68° F
Solubility in Water (Weight % @ °F): Insoluble.
Freezing/Melting Point: - 54° F Pour point.

SECTION 4 – HAZARD SUMMARY

POTENTIAL HEALTH EFFECTS:
Eye Contact: Slightly irritating but does not injure eye tissue.
Skin Contact: Low order of toxicity. Frequent or prolonged contact may irritate skin.
Inhalation: Negligible hazard at ambient temperature (- 18° C to 38° C, 0° F to 100° F).
Ingestion: Minimal toxicity.

SECTION 5 – FIRST AID MEASURES

Eye Contact: Flush eye with large amounts of water until irritation subsides. If irritation persists, get medical attention.
Skin Contact: Flush with large amounts of water, use soap if available.
Inhalation: Using proper respiratory protection, immediately remove the affected victim form exposure. Administer artificial respiration if breathing is stopped. Keep at rest. Call for prompt medical attention.
Ingestion: First aid is normally not required.

SECTION 6 – FIRE FIGHTING MEASURES

Flashpoint: 415° F **Method:** PMCC
Flammable Limits: Not available.
Autoignition Temperature: > 500° F
General Hazards: Low hazard, liquid can burn upon heating to temperatures at or above the flashpoint. "Empty" containers retain product residue (liquid and/or vapor) and can be dangerous. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, static electricity, or other sources of ignition: they may explode and cause injury or death. Empty drums should be completely drained, properly bunged and promptly returned to a drum reconditioner, or properly disposed of.
Fire Fighting: Use water spray to cool fire exposed surfaces and to protect personnel. Isolate "fuel" supply from fire. Use foam, dry chemical, or water spray to extinguish fire. Avoid spraying water directly into storage containers due to danger of boilover.
Decomposition Products Under Fire Conditions: Not unusual.

SECTION 7 – ACCIDENTAL RELEASE MEASURES

Land Spill: Eliminate sources of ignition. Prevent additional discharge of material, if possible to do so without hazard. For small spills implement cleanup procedures; for large spills implement cleanup procedures and, if in public area, keep public away and advise authorities. Also, if this product is subject to CERCLA reporting (see Section 11 REGULATORY INFORMATION) notify The National Response Center. Prevent liquid from entering sewers, watercourses, or low areas. Contain spilled liquid with sand or earth. Recover by pumping or with a suitable absorbent. If liquid is too viscous for pumping, scrape up. Consult an expert on disposal of recovered material and ensure conformity to local disposal regulations.
Water Spill: Remove form surface by skimming or with suitable absorbents. If allowed by local authorities and environmental agencies, sinking and/or suitable dispersants may be used in non-confined waters. Consult an expert on disposal of recovered material and ensure conformity to local disposal regulations.

SECTION 8 – STORAGE AND HANDLING

Storage Temperature: Ambient. **Storage/Transport Pressure, mmHg:** Atmospheric
Storage and Handling: Keep container closed. Handle and open containers with care. Store in a cool, well ventilated place away from incompatible materials. DO NOT handle or store near an open flame, heat or other sources of ignition. Protect material from direct sunlight. This material is not a static accumulator. Use proper bonding and/or grounding procedures. DO NOT pressurize, cut, heat, or weld containers. Empty product containers may contain product residue. DO NOT reuse empty containers without commercial cleaning or reconditioning.

SECTION 9 – EXPOSURE CONTROL/PERSONAL PROTECTION

Exposure Controls: The use of local exhaust ventilation is recommended to control process emissions near the source. Laboratory samples should be handled in a lab hood. Provide mechanical ventilation of confined spaces. See respiratory protection recommendations.
Personal Protection: For open systems where contact is likely, wear safety glasses with side shields, long sleeves, and chemical resistant gloves. Where contact may occur, wear safety glasses with shields. Where concentrations in air may exceed the limits given in this Section and engineering, work practice or other means of exposure reduction are not adequate. NIOSH/MSHA approved respirators may be necessary to prevent overexposure by inhalation. Natural rubber, butyl rubber and vinyl are not suitable protective materials, neoprene is recommended.
Workplace Exposure Guidelines
Rhino Linings Recommends the Following Occupational Exposure Limits: A TWA of 5 mg/m3 for alkyl phthalates (C6-C12).

SECTION 10 – STABILITY AND REACTIVITY

Stability: Stable. **Conditions to Avoid:** Not applicable.
Hazardous Polymerization: Will not occur. **Conditions to Avoid (Hazardous Polymerization):** Not applicable.
Materials and Conditions to Avoid (Incompatibility): Oxidizing agents.
Hazardous Decomposition Products: None.

SECTION 11 – REGULATORY INFORMATION

TSCA: This product is listed on the TSCA Inventory as a UVCB (Unknown, Variable Composition or Biological) Chemical at CAS Registry Number 68515-48-0.
CERCLA: If this product is accidentally spilled, it is not subject to any special reporting under the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). We recommend you contact local authorities to determine if there may be other local reporting requirements.
SARA TITLE III: Under the provisions of Title III, Section 311/312 of the Superfund Amendments and Reauthorization Act, this product is classified into the following hazards categories: Not hazardous.
Department of Transportation (DOT): This product is not DOT regulated.

SECTION 12 - DISCLAIMER

Disclaimer: The data set forth in this sheet are based on information provided by the suppliers of the raw materials and chemicals used in the manufacture of the aforementioned product. Rhino Linings USA, Inc. makes no warranty with respect to the accuracy of the information provided by their suppliers, and disclaims all liability of reliance thereof.

C & R Plating

Attachment #5

From: "Sherry J. Davis" <sbd@ksu.edu>
To: <crplating@nckcn.com>
Sent: Tuesday, February 14, 2006 5:11 PM
Subject: some wording

Okay Kevin,
when making a hazardous waste determination on the Rhino paint gun flush:

1. The Rhino coating is a two-part coating applied using a spray gun that mixes the two materials at the gun tip. Consequently the two-part coating never becomes a waste because the two delivery lines don't have to be emptied, so the raw materials of the Rhino material don't become a waste. (however, using the MSDS for each component, I have determined that neither component would be a hazardous waste due to flashpoint or toxicity, and neither have U or P-listed ingredients).The Rhino flush has a flashpoint of 415 degree fahrenhiet and contains no materials (as listed on the MSDS) that would make it a hazardous waste.
2. Floor debris: state what you'll do with the triple rinse. Then say that you are going to buy a secondary container made of compatible materials for storage of the chromic acid raw materials, in order to avoid such contamination in the future.
3. Bath chemicals: when the chemical baths are exhausted you will submit samples to the laboratory for TCLP analysis of regulated metal minus mercury. If results are above the regulatory limits, the materials will be disposed of as a hazardous waste through a permitted hazardous waste treatment, storage, and disposal facility.

Sherry
p.s. the manual is in the mail!

--
Sherry J. Davis
Pollution Prevention Institute
133 Ward Hall
Manhattan, KS 66506-2508
Phone: 1-800-578-8898

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