Sandra Cline
<cline729@yahoo.com>
07/27/2006 04:33 PM

To Kori Kuehl/ARTD/R7/USEPA/US@EPA
cc C & R Plating <crplating@nckcn.com>
bcc
Subject C&R Plating (Minneapolis, KS) Email Response to 7/25/06 Email

History: This message has been forwarded.

Dear Ms. Keuhl,

This email is in response to your emails of July 25, 2006 and July 18, 2006 regarding the EPA site visit dated February 7, 2006. The blue colored notes are our prior correspondence.

This was our response of July 20th to your July 18th, 2006 email.
" *Response to question #1 of email dated July 18, 2006.*
This response is relating to #4 (1) of letter dated June 16, 2006. We want to clarify that sludge is generated only by the wastewater treatment system. Prior to entering the wastewater treatment system, what we have termed as "sludge" is better described as slurry. Periodically, (approximately 3-6 months) the caustic soda tanks are pumped out to storage tanks. Two to three inches of slurry are left in the bottom of the tank. This slurry is pumped to the wastewater treatment system where it is run through a clarifier and filter press. The generated sludge cake is dumped into the hazardous waste barrels and disposed of as described in the June 16, 2006 letter. This process was started approximately February 17, 2006 when lab results showed the waste to be hazardous. "

466937
RCRA RECORDS

Response to July 25, 2006 email questions.

There are four temporary storage tanks (ST) at the facility:
Caustic Soda: ST-1 (720 gallons), Line 1; ST-2, Line 2 (1200 gallons)
Muratic Acid: ST-3 (720 gallons), Line 1; ST-4, Line 2 (1200 gallons)

1. ST-1 (720 gal) and ST-2 (1200 gal) are tanks that are normally used as rinse tanks in the plating process. The rinse tanks are drained to the WWTP before being used as temporary storage tanks.
2. ST-1 and ST-2 are directly west of the caustic soda tanks on each line.
3. Caustic soda solution is temporarily stored in ST-1 and ST-2 while caustic slurry is being pumped to the WWTP. The caustic soda solution stored in ST-1 and ST-2 is not combined with any other plating process solution.
4. The caustic soda solution is transferred back to the caustic soda tank by a portable submersible pump.
5. The caustic soda solution is stored in ST-1 and ST-2 for 1-2 hours while the caustic soda process tank is being cleaned of the remaining slurry.
6. ST-1 and ST-2 are both hard-piped to the WWTP.
7. The caustic soda solution temporarily stored in ST-1 and ST-2 is returned to the plating

process tank to be reused.

8. No analytical tests are done because the caustic soda solution is reused in the plating process.
9. (Will address later in this email since it does not pertain to the above.)
10. The caustic soda tanks on each line are deslurried at different intervals according to need.

Response to email dated July 18, 2006

"Response relating to #4 (2) of letter dated June 16, 2006. Periodically, (approximately 3-6 months) the muratic acid tanks are pumped out to storage tanks. Two to three inches of slurry left in the bottom of the tank. This slurry is pumped to the wastewater treatment system where it is run through a clarifier and filter press. The generated sludge cake is dumped into the hazardous waste barrels as described in the June 16, 2006 letter. This process was started approximately February 17, 2006 when lab results showed the waste to be hazardous."

Response to July 25, 2006 email questions.

1. **ST-3 (720 gal) and ST-4 (1200 gal) are tanks that are normally used as rinse tanks in the plating process. The rinse tanks are drained to the WWTP before being used as temporary storage tanks.**
2. ST-3 and ST-4 are directly west to the muratic acid tanks on each line.
3. The muratic acid solution is temporarily stored in ST-3 and ST-4 while muratic acid slurry is being pumped to the WWTP. The muratic acid solution stored in ST-3 and ST-4 is not combined with any other plating process solution.
4. The muratic acid solution is transferred back to the muratic acid tank by a portable submersible pump.
5. The muratic acid solution is stored in ST-3 and ST-4 for 1-2 hours while the muratic acid process tank is being cleaned of the remaining slurry.
6. ST-3 and ST-4 are both hard-piped to the WWTP.
7. The muratic acid solution temporarily stored in ST-3 and ST-4 is returned to the plating process tank to be reused.
8. No analytical tests are done because the muratic acid solution is reused in the plating process.
9. (Will address later in this email since it does not pertain to the above.)
10. The muratic acid tanks on each line are deslurried at different intervals according to need.

Response to question #9 of email dated July 25, 2006. All experimental plating line process solutions were pumped to the existing production plating lines and reused by February 28, 2006. The muratic acid, caustic soda and zinc rinses were run through the WWTP.

If have further questions, please call me.

Kevin Cline, Owner
C&R Plating
1120 E 10th Street

Minneapolis, KS 67467
785-392-2626

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