UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

AUG 2 2 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Kevin Cline
C & R Plating
1120 East Tenth Street
Minneapolis, Kansas 67467

Dear Mr. Cline:

Re: Pre-Filing Negotiations for Resource Conversation and Recovery Act Violations

The Environmental Protection Agency, Region VII ("EPA") conducted a Compliance Evaluation Inspection at C & R Plating ("C & R") on February 7, 2006, to determine C & R's compliance status with the Resource Conservation and Recovery Act ("RCRA"). Based on information gathered during this inspection, violations of Section 3005 of RCRA and its underlying regulations have been documented. Enclosed to this letter is a list of regulatory violations for which EPA proposes to seek penalties.

Prior to initiating any formal penalty action, EPA would like to provide C & R an opportunity to discuss and hopefully resolve the violations documented during the inspection without the need for litigation.

Please contact me at (913) 551-7110 no later than seven (7) days after you receive this letter. If I do not hear from you by this time, I will assume that you are not interested in pre-filing negotiations and EPA will proceed with an enforcement action to address the violations at C & R.

Thank you for your attention.

Sincerely,

Kelley Hickman

Kelley Hickman
Assistant Regional Counsel

Enclosure

467185

RCRA RECORDS

GLOBE 100 RECYCLED % FIBER

PENALTY COMPUTATION WORKSHEET Company Name: C & R Plating RCRIS ID: KSR000504803	
COUNT 1 Failure to make a hazardous waste determination: KAR 28-31-4(b)	
1. Gravity Based Matrix Value (value from matrix table) (a) Potential for Harm: Major (b) Extent of Deviation: Moderate	$67,800.00
2. Multi-day Matrix Value (value from matrix table) (a) Potential for Harm: N/A (b) Extent of Deviation: N/A	0
(c) Days of Noncompliance: 0	0
(d) Multi-day Penalty TOTAL	0
INITIAL PENALTY TOTAL	$67,800.00
3. Adjustment Factors (+/- 25% adjustment allowed on each factor) [note: use () to denote negative numbers] (a) Good Faith: N/A	0
(b) Willfulness/Negligence: N/A	0
(c) History of Noncompliance: N/A	0
(d) Ability to Pay: N/A	0
(e) Environmental Projects: N/A	0
(f) Other Unique Factors: N/A	0
% AMOUNT OF PENALTY ADJUSTMENT	0
$ AMOUNT OF PENALTY ADJUSTMENT	$0.00
4. Economic Benefit	$0.00
TOTAL PENALTY AMOUNT FOR COMPLAINT-COUNT 1	$67,800.00
TOTAL PENALTY AMOUNT FOR COMPLAINT	$74,300.00

PENALTY COMPUTATION WORKSHEET Company Name: C & R Plating RCRIS ID: KSR000504803	
COUNT 2 Failure to Manifest Hazardous Waste Shipments: KAR 28-31-4(m)(2)	
1. Gravity Based Matrix Value (value from matrix table) (a) Potential for Harm: Moderate (b) Extent of Deviation: Moderate	$6,500.00
2. Multi-day Matrix Value (value from matrix table) (a) Potential for Harm: N/A (b) Extent of Deviation: N/A	0
(c) Days of Noncompliance: 0	0
(d) Multi-day Penalty TOTAL	0
INITIAL PENALTY TOTAL	$6,500.00
3. Adjustment Factors (+/- 25% adjustment allowed on each factor) [note: use () to denote negative numbers] (a) Good Faith: N/A	0
(b) Willfulness/Negligence: N/A	0
(c) History of Noncompliance: N/A	0
(d) Ability to Pay: N/A	0
(e) Environmental Projects: N/A	0
(f) Other Unique Factors: N/A	0
% AMOUNT OF PENALTY ADJUSTMENT	0
$ AMOUNT OF PENALTY ADJUSTMENT	$0.00
4. Economic Benefit	$0.00
TOTAL PENALTY AMOUNT FOR COMPLAINT-COUNT 2	$6,500.00
TOTAL PENALTY AMOUNT FOR COMPLAINT	$74,300.00