File ID Number: HWCB2016 <u>5709</u>	DEQ/DWM/Hazardous Waste Section
NCD/NCR (other) Number: NCO 991 302	2 542
Facility Name: <u>Chrome East</u> , LLC	
Address: 321 Sign Drive	<u>City: Concord</u>
County: <u>Cabarrus</u>	
File Date Range: April 2007 - A	pril 2010
Document Type (s)	
Inspection Reports	
*NOV (See Comments)	
* Compliance Orders/Settlement Ag	reement (See Comments)
*(Provide NOV Type, Docket Numbe	r and Date of NOV in Comment Section)
Correspondence/Letters	
Pictures (Tape to a full sheet of pape	r)
** Name Change and Date of Change	2
/ ** (Write Name Change Information	in Comment Section)
Sampling Data	
Other Information (See Comments)	
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City: CONCORD		28027	Coun	ty: CABAR	<u>Lus</u>
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. Hazardous Waste Section File Room Document Transmittal Sheet

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🛛 Hazardous Waste Report (HWR)	Part B Application (PB)	RCRA Facility Assessment (RFA)
Fees/Invoices (F)	Notice of Deficiency (NOD)	Confirmatory Sampling (CS)
Technical Assistance (TA)	Permitting Information (PI)	RCRA Facility Investigation (RFI)
Compliance Assistance Visit (CAV)	Alternative to Post-Closure Permit (APC)	Interim Measures Study/Plan/Implemented (IM)
Correspondences to/from Facility (GC)	Correspondences to/from Facility (CP)	Corrective Measure Plan/Design (CMP)
Other (GO)	🛛 Other (PO)	Land Use Restriction, Institutional Controls (LUR)
Closure (C)	Groundwater (W)	Remediation System Effective Reports (RSER)
Closure Information (CI)	Groundwater Monitoring Report (GMR)	Corrective Measures Study (CMS)
Closure Plan (CP)	Comprehensive Monitoring Event (CME)	🗇 HSWA Remedy (HSWA)
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Financial Record Review (FRR)	Compliant Investigation (CMP)	Ticket Notice of Violation (TNOV)
Mechanisms and instruments (MI)	Compliance Evaluation Inspection (CEI)	Notice of Violation (NOV)
Financial statements (FS)	Case Development Inspections (CDI)	Immediate Action Notice of Violation (IANOV)
Balance sheets (BS)	Compliance Schedule Evaluation (CSE)	🛛 Enforcement Package (EP)
Tax returns (TR)	Focused Compliance Inspection (FCI)	Compliance Order (CO)
Insurances (I)	Emergency Response (EMR)	Administrative Order on Consent (AOC)
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III. Description:

Use up to 256 characters to describe the document. Every word below can be used as a searchable index to locate the document

IV. Date of Document: Date when the document generated, the date typed or printed on the front page of document

Date on Document	04	26	2010
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NC DEPT OF ENVIRONMENT & NATURAL RESOURCES DIVISION OF WASTE MANAGEMENT HAZARDOUS WASTE SECTION

RCRA INSPECTION REPORT

1.	Facility Information:	ChromeEast, LLC 321 Sign Drive Concord, NC 28027-6117 NC0991302542
	Owners Address:	Headline Investment, d.b.a. Chrome East, LLC 13024 Ballantyne Corporate Place, Suite 340 Charlotte, NC 28277
2.	Facility Contact:	Mr. Bob Brown, Consultant 407-376-7377 Mr. Shannon Erman, Owner
3.	Survey Participants:	Mr. Bob Brown Mr. Shannon Erman Mr. Sean Morris, Environmental Senior Specialist
4.	Date of Inspection:	April 22, 2010
	Date of Report:	April 26, 2010
5.	Purpose of Inspection:	To determine compliance with 40 CFR 260-279.

6. <u>Report</u>:

ChromeEast, LLC is located in Concord, NC. The facility currently has 3-employees and operates on a limited basis. The facility has ceased their decorative chrome process since the last inspection. The facility is currently in the process of removing equipment associated with that process. The facility is primarily chrome plating exhaust pipes for the trucking industry. Mr. Bob Brown is currently working for ChromeEast as a consultant. The future of the plating operations at the facility is uncertain. The facility does not have a pretreatment system. The facility is approximately 12,000-15,000 square feet in size.

The facility no longer uses cyanides in their plating operations. The facility is notified as a large quantity generator of hazardous waste. Mr. Brown explained that they plan on re-notifying to a small quantity generator if production increases in the future. There were several small containers of cyanide solution on site and Mr. Brown explained that the materials would be sold as product. The facility also no longer conducts any sand blasting operations but does generate a small amount of steel dust from the preparation of steel exhaust pipes for plating (see comments section). The facility is currently operating as a conditionally exempt small quantity generator and has not disposed of any waste since the last inspection conducted on July 21, 2009. Mr. Brown explained that plating solutions that drip from parts after plating are dripped back into each plating bath for reuse. Mr. Brown also explained that their primary waste will be spent sodium hydroxide solution but business has been so slow

that they have not needed to change the solution. During the inspection we reviewed the different hazardous waste generator categories and I provided instructions on changing generator status (see comments section).

7. <u>Waste Type</u>:

D007 – hazardous waste liquid (chromium) D003 – waste cyanide solution (copper cyanide) D002 – waste sodium hydroxide solution

8. Manifests:

The facility has not shipped any hazardous waste since the last inspection.

9. Deficiencies:

None

10. Recommendations / Comments:

- It is strongly recommended that all containers of plating chemicals remain closed except when being used and that all containers be labeled with their contents. It is also strongly recommended that the facility obtain spill kits and over pack containers. All damaged containers must be over-packed to minimize the possibility of a release.
- It is a reminder that if the facility generates more than 220-pounds of hazardous waste per calendar month the facility would be operating as a SQG and would have to comply with all SQG hazardous waste regulations. If the facility generates more than 2,200-pounds in a calendar month the facility must comply with LQG regulations. A SQG regulatory checklist is provided with this report. The facility must submit an updated Hazardous Waste Notification Form, 8700-12.
- It is a reminder that all waste that is generated by the facility must have a hazardous waste determination as required by Title 40 Code of Federal Regulations, Part 262.11. The facility must determine if the steel dust being accumulated in the metal preparation area must have a hazardous waste determination and should be properly labeled after the determination is made. For questions or assistance for any waste determination contact Sean Morris, NC Hazardous Waste Section, at 704-235-2155.

4/26/10 **INSPECTOR (DATE**

(SENT BY US MAIL) FACILITY CONTACT

cc: MRO Files Brent Burch, Western Area Compliance Supervisor Central Office Files Shannon Erman, ChromeEast, LLC

Hazardous Waste Compliance Data Entry Form

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NC DEPT OF ENVIRONMENT & NATURAL RESOURCES DIVISION OF WASTE MANAGEMENT HAZARDOUS WASTE SECTION

RCRA INSPECTION REPORT

1.	Facility Information:	ChromeEast, LLC 321 Sign Drive Concord, NC 28027-6117
	Owners Address:	Headline Investment 5113 Piper Station Dr, Suite 206 Charlotte, NC 28277
2.	Facility Contact:	Mr. Bob Brown, Private Consultant 407-376-7377 Mr. Shannon Erman, Owner
3.	Survey Participants:	Mr. Bob Brown Mr. Sean Morris, Environmental Senior Specialist Mr. Mike Williford, Compliance Branch Head
4.	Date of Inspection:	July 21, 2009
	Date of Report:	July 21, 2009
-	Design of Learner times	To determine compliance with 40 CED 260 270

5. <u>Purpose of Inspection</u>: To determine compliance with 40 CFR 260-279.

6. Report:

Chrome East, LLC is located in Concord, NC. The facility currently has 3-employees and operates on a limited basis. The facility has ceased their decorative chrome process since the last inspection. The facility is currently in the process of removing equipment associated with that process. The facility is currently plating exhaust pipes for the trucking industry. Mr. Bob Brown is currently working for ChromeEast as a consultant. The future of the plating operations at the facility is uncertain.

The facility no longer uses cyanides in their plating operations. The facility is notified as a large quantity generator of hazardous waste. Mr. Brown explained that the facility generated a large shipment of hazardous waste from the dismantling of the decorative chrome line in February 2009. The facility disposed of (69) containers of hazardous waste that month. Since that time the facility has not generated any hazardous waste. Mr. Brown explained that they plan on re-notifying to a small quantity generator if production increases in the future. There were several small containers of cyanide solution on site and Mr. Brown explained that the materials would be sold as product. The facility also no longer conducts any sand blasting operations. The facility is currently operating as a conditionally exempt small quantity generator. During the inspection we reviewed the different hazardous waste generator categories and I provided instructions on changing generator status (see recommendation section).

7. <u>Waste Type</u>:

D007 – hazardous waste liquid (chromium) D003 – waste cyanide solution (copper cyanide)

8. Manifests:

The facility shipped (69) containers of hazardous waste to Environmental Enterprises, Inc (OHD063377010) on February 5, 2009. The facility completed two separate manifests for the shipment. A final manifest copy with the hand written signature of the designated facility was not available at the time of the inspection. On July 22, 2009 Mr. Bob Brown faxed the signed manifests.

9. Deficiencies:

None

10. Recommendations / Comments:

- It is strongly recommended that all containers of plating chemicals remain closed except when being used. It is also strongly recommended that the facility obtain spill kits and over pack containers. All damaged containers must be over-packed to minimize the possibility of a release.
- It is a reminder that if the facility generates more than 220-pounds of hazardous waste per calendar month the facility would be operating as a SQG and would have to comply with all SQG hazardous waste regulations. If the facility generates more than 2,200-pounds in a calendar month the facility must comply with LQG regulations. The facility recently conducted a cleanout that caused the facility to operate as a LQG for one month. If future shipments continue to cause the facility to operate as a LQG then all LQG regulations must be followed. For information on SQG and LQG regulatory information visit: www.wastenotnc.org.

<u>- 7/24/09</u>

(SENT BY US MAIL) FACILITY CONTACT

cc: MRO Files Brent Burch, Western Area Compliance Supervisor Central Office Files Shannon Erman, ChromeEast, LLC

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EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED) 2

HEADLINE GROUP

ENVIRONMENTAL ENTERPRISES, INC. **RESTRICTED WASTE NOTIFICATION & CERTIFICATION**

Manifest Document No 005215810JJK State Manifest No: n/a reperator: CHROME EAST This shipment contains waste(s) restricted from land disposal under 40 CFR Part 268 and OAC Chapter 3745-59. A copy of this notice and all supporting analysis must be kept for three (3) years.

INSTRUCTIONS:

Column 1: List all waste codes that apply to this waste.

Column 2: Mark the appropriate treatability Group that applies to the waste at the point of Generation. Wastewater is <1% total Suspended solids and <1% total organic carbon, NWW (Non-Waste Water) or WW (Waste Water)

Column 3: Enter legend if any for the subcategory that applies to this waste from the subcategory list on page 2 of this form.

Column 4: Enter the letter of the appropriate paragraph from pages 1 & 2 of this form Column 5: If D001-D043, enter the Reference # for All underlying hazardous constituents that may be present in the waste. If F001-F005, enter the Reference # of the constituents of concern from the entached; DET's Restricted Waste Notification & Certificate for Underlying Hazardous Constituent Treatment Standards.

EEI Profilo Number	1. Waste Code	2. Treatsbility Group	3. Subcategory Legend (if any)	4. How Waste must be Managed (A-N)	5. Reference # of hazardous constituents in waste (complete for F001-F005 & D001-D043), Soil & Debris
V6619	D002, D007	NWW		A 1	
V6624	D002	NWW .		A	
V6622	F001	NWW	•	A	

FOR ADDITIONAL PROFILES, USE ATTACHED CONTINUATION FORM.

	ERTIFICATION! (Please sign)
The information provided is true and correct and is blockdon anoty 60012-80018 or on my thorough nowledge of the maste.	lysis of a representative sample of the waste in accordance with EPA guidelines Document SW-846 EPA
	- L COD 2/0/03
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	OW WASTE MUST BE MANAGED

RESTRICTED WASTE REQUIRING TREATMENT TO THE APPROPRIATE TREATMENT STANDARD This shipment contains restricted waste that must be treated to comply with applicable treatment standards and/or prohibitions prior to land disposal.

RESTRICTED WASTE THAT CAN BE LANDFILLED WITHOUT FURTHER TREATMENT B.

This shipment contains a restricted waste that meets the applicable treatment standards and/or prohibition levels and can be landfilled without further treatment. I have attached all available supporting data. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CRF part 268 Subpart D, in Rules 3745-59-40 to 3745-59-44 of the Administrative Code, and all applicable prohibitions set forth in 40 CFR 268.32, and Rules 3745-59-32 of the Administrative Code or Section 3004(d) of RCRA. I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment." Evaluation of this waste is based upon: _____Analysis (attached) _____ Knowledge of waste (materials used/process employed)

RESTRICTED WASTE TREATMENT TO PERFORMANCE STANDARDS

"I certify under penalty of law that I have personally examined and am familiar with the treatment lochnology and operation of the treatment process used to support this certification and that the waste complies with the treatment standards specified in 40 CFR part 268 Subpart D, (and) in Rules 3745-59-32 to 3745-59-44 of the Administrative Code, and all applicable prohibitions set forth in 40 CFR 268.32 and in Rule 3745-59-32 of the Administrative Code or Section 3004(d) of RCRA without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

- RESTRICTED WASTE FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND D. THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY) "I certify under penalty of law that the waste has been treated m accordance with the requirements of 40 CFR 268.42 and rule 3745-59-42 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of times and imprisonment."
- E. CHARACTERISTIC WASTE TREATED TO REMOVE HAZARDOUS CHARACTERISTICS THAT REQUIRES ADDITIONAL TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS (Reference Underlying Hazardous Constituent Form.) "I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This de-characterized waste contains underlying hazardous constituents that require further treatment to meet Universal Treatment Standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

F. LAB PACK QUALIFYING FOR ALTERNATIVE CERTIFICATION UNDER 40 CFR 268. Hazardous waste with the following waste codes may not be placed in lab parks under alternate treatment standards of 168.42 (INCIN) D009, K019, K003, K004, K005, K006, K071, K100, K106, P010, P011, P012, P076, P078, U134 and U151."I certify under penalty of law that I have personally examined and am familiar with

Environmental Enterprises, Inc.

Restricted Waste Notification Form 03

Revised 6/00

- the waste and that the lab pack contains only wastes which have been excluded under Appendix IV to 40 CFR part 268 or solid wastes not subject to regulation under 40 CFR part261. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."
- THIS RESTRICTED DEBRIS HAS BEEN TREATED IN ACCORDANCE WITH 40 CYR 268.45. "I certify under penalty of law that the debris has been G. treated in accordance with the requirements of 40 CFR 268.45. I am aware that there are significant penalties for making false certification, including the possibility of a fine and imprisonment."
- H. THIS LAB PACK DOES NOT CONTAIN ANY WASTE IDENTIFIED AT APPENDIX IV TO PART 263. "I certify under penalty of law that I personally have examined and am familiar with the waste and that the statement above is true and that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification including possibility of fine and imprisonment."
- THIS RESTRICTED WASTE HAS BEEN TREATED TO REMOVE THE HAZARDOUS CHARACTERISTIC. "I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This do-characterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am awate that there are significant penalties for submitting a false certification including possibility of fine and imprisonment."
- THIS RESTRICTED WASTE HAS BEEN TREATED TO REMOVE THE HAZARDOUS CHARACTERISTIC AND BEEN TREATED FOR J. UNDERLYING HAZARDOUS CONSTITUENTS. "I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR. 268.40 to remove the hazardous characteristic and that underlying hazardous constituents, as defined in 268.48 Universal Treatment Standards. I am aware that there are significant penalties for submitting a false certification including possibility of fine and imprisonment."
- THIS RESTRICTED WASTE IS SUBJECT TO AN EXEMPTION FROM LAND DISPOSAL. (Please include the date the waste is subject to the prohibitions К. in Column 4) This waste is subject to an exemption from a prohibition on the type of land disposal method utilized for the waste (such as, but not limited to, a case-by-case extension under 40 CFR 268.5, an exemption under 40 CFR 268.6, or a nationwide capacity variance under 40 CFR 269 Subpart C)
- THIS DECHARACTERIZED WASTE CONTAINS UNDERLYING HAZARDOUS CONSTITUENTS THAT REQUIRE FURTHER TREATMENT TO ¥., MEET UNIVERSAL TREAMENT STANDARDS. "I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristics. I am aware that there are significant penalties for submitting a false certification including possibility of fine and imprisonment,"
- For M, circle the appropriate response for the 3 italicized options:
- M. THIS CONTAMINATED SOIL DOES DOT (CIRCLE ONE) CONTAIN LISTED HAZARDOUS WASTE AND DOES/DOES NOT (CIRCLE ONE) EXHIBIT A CHARACTERISTIC OF HAZARDOUS WASTE AND IS SUBJECT TO/COMPLIES WITH (CIRCLE ONE) THE SOIL TREATMENT STANDARDS. "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 CFR 268.49 without impermissible dilution of the prohibited wastes. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
- N. THIS HAZARDOUS DEBRIS IS SUBJECT TO THE ALTERNATIVE TREATMENT STANDARDS OF 40 CFR 268.45

F001-F005 Spent Solvent Treatment Standards: Please see attached 'EEI's Restricted Waste Notification & Certificate for Underlying Hazardons Constituent ument Standards' for treatment standard

T LESO	tent standalda	for thestment standard			
	F001 & F002		<u>F003</u>	<u>F004</u>	F005
44)	Carbon Tetrach	oride 4)	Acetone	65 & 66) Cresols (m & P	25) Benzene
48)	Chlorobenzene	35)	n-Butyl Alcohol	isomers)	43) Carbon Disulfide
81)	1,2 Dichlorober			64, 65, & 66) Cresylic Acid	144) Isobutanol
	Methylene Chic) Ethyl Acetate	Mixed (o, m, p	158) Methyl Ethyl Ketone
	Tetrachloroethy) Ethyl Bezene	isomers)	206) Pyridine
	1,1,1 Trichlorot			64) O Cresols	219) Tolucno
	1,1,2 Trichloroe			170) Nitrobenzene	
233)	1,1,2 Trichloro-) Methyl Isobutyl Ketone		
	Trifluoroethane) Xylene		
227)	Trichloroethyle	ne			
228)	Trichlorofluoro				
		EEI P	ERMITTED WASTE CODES TH	IAT HAVE SUBCATEGORIES	
Code			Subcategory		· · .
D001		High TOC ignitable liquid			
	DIB		istes except high TOC >10% ignitable liq	ruids	
D003		Reactive Sulfides			
	D3B	Other Reactives			
	D3C	Water Reactive			
	D3D	Reactive Cyanide			
	dje	Explosives			
D006		Cadmium Containing Batt	eries		
D008		Lead Acid Batteries			
D009			cury-Organic Subcategory (≥ 260 PPM t	otal Mercury)	
	D9B	Non-wastewater High Mer	cury-Inorganic Subcategory		
				• • ·	

D9C Non-wastewater that contains < 260 mg/kg total mercury (Low Mercury Subcategory)

Wastes that contain only one or more of the following solvents: carbon disulfide, cyclohexane, and/or methanol F003 F3A F005 F5A Wastes that contain only one or more of the following solvents: carbon disulfide, cyclohoxano, and/or methanol Contains only 2-Nitropropane F1B F5C Contains only 2-Ethoxyethanol K69A Calcium Sulfate (Low Lead) K069 K69B Non-Calcium Sulfate (High Lead) Phenyl mercuric acetate non-wastewaters, regardless of their total mercury content, that are not incinerator residues or are not P092 P92A residues from RMERC

Environmental Enterprises, Inc.

Restricted Waste Notification Form 03

Revised 6/00

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HEADLINE GROUP

ENVIRONMENTAL ENTERPRISES, INC. **RESTRICTED WASTE NOTIFICATION & CERTIFICATION**

Generator: CHROME EAST Manifest Document No 005215809JJK State Manifest No: n/a This shipment contains waste(s) restricted from land disposal under 40 CFR Part 268 and OAC Chapter 3745-59. A copy of this notice and all supporting analysis must be kept for three (3) years.

EPA ID Number	NCO	991 302 54	.2			
Facility Name: _		CHROME EA	ST.LLC			
Street: <u>32</u>	1 SIGN	DEVE				
City: <u>Conces</u>	-D	ZIP:2	3027	Count	y: CABAFRUS	
Contact Name:	JASO	N SMITH		Phone	#:	89.00
EVALUATION	DATA	New: X Chang	ge: Del	ete:		
Date: c	4/15/20	003	Evaluation 7	Type: <u>CEI</u>	·	
Date: o	7/25/200	8	Evaluation '	Гуре: <u>СS</u> Е		
Inspector	ID #: <u>046</u>					
Evaluation Com	ments:			<u> </u>	<u></u>	
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determinations ar form.)	e SNY/SNN	this evaluation res Vevaluations. The S				
Facility is (check		_ a SNC (SNY ev	valuation)		Docket #	
or		_ no longer a SN	C (SNN eval	uation)		,
===========		================================				
YES/NO Waste Involved	CSE ONLY Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells
			 .			
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Date Determined	l: <u>0 4 /</u>	1 5/2008	:#####################################	CIIVERANAAAA		==##EEE#=#200
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Regulation Desc	ription:	GS 130A-20	94.1 (e)			
Comment:						

REVISED

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Date Determined: <u>o</u> <u>4</u>	115/03		
Branch: <u>01</u>	Person: <u>046</u>		
Return to Compliance: Regulation Description: _		2/02/08 Scheduled 262.N	<u>07/25/08</u> Actual
		<u>. </u>	
Date Determined:			
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Return to Compliance:		Scheduled	// Actual
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Date Determined:			
Branch: <u>01</u>	Person: <u>046</u>		
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Date Determined:	_//	· · ·	
Branch: <u>01</u>	Person: <u>046</u>		
Return to Compliance:		// Scheduled	/// Actual
Regulation Description:			
Comment:			

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NC DEPT OF ENVIRONMENT & NATURAL RESOURCES DIVISION OF WASTE MANAGEMENT HAZARDOUS WASTE SECTION

RCRA RE-INSPECTION REPORT

1. <u>Facilit</u>	y Information:	Chrome East, LLC 321 Sign Drive Concord, NC 28027-6117 NCO 991 302 542
2. <u>Facilit</u>	v Contact:	Mr. Jason Smith, Owner 704-784-8900
3. <u>Survey</u>	<u>y Participants</u> :	Mr. Jason Smith Mr. Brian Polk, DWM Safety Consultant Mr. Sean Morris, Environmental Senior Specialist
4. Date o	f Re-Inspection:	July 25, 2008
Date o	f Report:	July 25, 2008
5. <u>Purpo</u>	se of Inspection:	To determine compliance with Notice of Violation, Docket # 2008-085

6. Report:

On July 3, 2008 Brian Polk and I visited Chrome East, LLC to conduct oversight sampling on used sandblast material and soil that has been excavated from an area outside of the facility. The facility was issued Notice of Violation, Docket # 2008-085 for failure to conduct a hazardous waste determination on the used sandblast material and for failure to properly pay a large quantity generator fee for a hazardous waste shipment of 2310-gallons of hazardous waste on 2/15/08. We met with Mr. Jason Smith at the time of the visit.

The facility has excavated the sandblast material and has placed the used sandblast material/soil into three 100-gallon plastic tubs. The tubs are being stored inside the facility. Mr. Jason Smith collected one soil sample and had the sample analyzed for TCLP and total metal content. The results indicated trace metal concentrations but did not indicate that the used sandblast material was a hazardous waste. During our visit Mr. Polk and I sampled seven locations from the excavation area next to the facility. One sample did indicate a result of 100 ppm. Mr. Smith instructed an employee to excavate the soil and we re-sampled. The result was a non-detect. Mr. Polk also used the XRF to sample each of the three plastic tubs holding excavated used sandblast material/soil. One of the results indicated 125 ppm and the other two were non-detect. Mr. Polk also collected one analytical sample from each of the tubs to be analyzed for TCLP metals through a contracted laboratory.

On 7/16/08 I received the TCLP RCRA metals sample results for the three samples collected by Brian Polk on 6/3/08. The results confirmed that the excavated soil is not a hazardous waste.

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OPY

On 7/25/08 Beverly Metcalf, Pretreatment Coordinator, with the City of Concord and I conducted a complaint investigation at Chrome East. On June 17, 2008 I received a complaint referral from DENR Customer Service Center. An anonymous complainant issued a complaint stating that Chrome East was pouring plating rinse waters down a toilet inside the facility. On 7/15/08 I was contacted by Kevin Lapointe, EPA Criminal Investigation Division. We discussed the complaint specifics and I provided information on prior site visits and operations.

Beverly Metcalf and I met with Jason Smith and conducted a walkthrough of the facility. We checked the toilet areas within the facility. We questioned Mr. Smith on the operation and wastewater discharge operations at the facility. Mr. Smith explained that the facility does not generate any wastewater except for spill residues which are collected in a 30-gallon container. Mr. Smith also explained that he has had various other agencies called in for complaints in the past couple of weeks. The facility will be seeking a discharge permit in the next couple of months when the facility begins operating a new plating line. The facility will be installing a water treatment evaporator that will generate F006 hazardous waste. Based on the information available, at the time of the inspection, there was not any evidence that the complaint was valid. Future inspections will be conducted once the facility begins to operate the new plating line.

7. Site Deficiencies & Corrective Actions:

- GS 130A-294.1 (e) Chrome East, LLC is in violation of this regulation in that the facility has generated more than 1000-kilograms (2,200 pounds) of hazardous waste per calendar month and the facility did not properly notify as a large quantity generator of hazardous waste (LQG) and did not pay the annual fee of \$1000.00. It was determined that Chrome East LLC has operated as a large quantity generator during February 2008 and had not paid an annual fee for the specified periods. The facility manifested 2145-gallons of D007 waste and 165-gallons of D003 waste to Chemtron Corporation, EPA ID Number OHD066060609, on February 15, 2008. Chrome East LLC shall pay the annual fee of \$1000.00 for the year 2008. Payment and notification should be sent to Ms. Helen Cotton at NCDENR-DWM, 1646 Mail Service Center, Raleigh, N.C. 27699-1646. Questions concerning fee payment should be directed to Ms. Cotton at (919) 508-8537. The facility has paid there LQG fee. Violation corrected.
- 40 CFR 262.11 Chrome East, LLC is in violation of this regulation in that there was an area of used sandblast material on the ground outside of the side door on the south side of the property. The sandblast material has been used to fill in a hole. The facility has failed to provide any information to show that a proper hazardous waste determination has been made. Analytical sampling coordinated through Chrome East and samples analyzed by XRF as well as samples collected by the Hazardous Waste Section, did not indicate the presence of a hazardous waste. Violation corrected.

9. <u>Reminders:</u>

• It is a reminder that a generator status determination must be made once the new plating line is operational. The facility must notify to the appropriate generator status using EPA Form 8700-12 and must comply with all Hazardous Waste Regulations with the appropriate generator status.

INSPECTOR (DATE)

SENT US MAIL FACILITY CONTACT

cc: MRO Files Brent Burch, Western Area Compliance Supervisor Central Office Files Jason Smith, Chrome East, LLC



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor William G. Ross Jr., Secretary

June 4, 2008

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT REQUESTED</u>

NOTICE OF VIOLATION DOCKET # 2008-085

Mr. Jason Smith (Owner) Chrome East, LLC 321 Sign Drive Concord, NC 28027

Dear Mr. Smith:

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (Section) was authorized to operate the State Resource Conservation and Recovery Act (RCRA) hazardous waste program under the Solid Waste Management Act (Act), North Carolina General Statute 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program. Chrome East, LLC located in Concord, North Carolina, was found to have operated as a large quantity generator of hazardous waste during the month of February 2008 because of a clean out of hazardous waste. The facility typically operates as a conditionally exempt small quantity generator of hazardous waste. Large quantity generators are subject to the requirements of 40 CFR 262 adopted by reference at 15A NCAC 13A .0107, 40 CFR 265 adopted by reference at 15A NCAC 13A .0110, 40 CFR 268 adopted by reference at 15A NCAC 13A .0112, 40 CFR 273 adopted at 15A NCAC 13A .0119 and 40 CFR 279 adopted by reference at 15A NCAC 13A .0118.

On April 15, 2008 Mr. Sean Morris, Senior Environmental Specialist, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. Mr. Jason Smith, Facility Owner, was present during the inspection. During that inspection, the following violation was noted:

- A. 40 CFR 262.11, adopted by reference at 15A NCAC 13A .0107. Pursuant to this section a person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:
 - (a) He should first determine if the waste is excluded from regulation under 40 CFR 261.4.

1646 Mail Service Center, Raleigh, North Carolina 27699-1646 Phone 919-508-8400 \ FAX 919-715-3605 \ Internet http://wastenotnc.org An Equal Opportunity / Affirmative Action Employer – Printed on Dual Purpose Recycled Paper (b) He must then determine if the waste is listed as a hazardous waste in Subpart D of 40 CFR Part 261.

[Note: Even if the waste is listed, the generator still has an opportunity under 40 CFR 260.22 to demonstrate to the Administrator that the waste from his particular facility or operation is not a hazardous waste].

- (c) For purposes of compliance with 40 CFR Part 268, or if the waste is not listed in Subpart D of 40 CFR Part 261, the generator must then determine whether the waste is identified in Subpart C of 40 CFR Part 261 by either:
 - Testing the waste according to the methods set forth in Subpart C of 40 CFR Part 261, or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or
 - (2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.
- (d) If the waste is determined to be hazardous waste, the generator must refer to Parts 261, 264, 265, 266, 268, and 273 of this chapter for possible exclusions or restrictions pertaining to management of the specific waste.

Chrome East, LLC is in violation of this regulation in that there was an area of used sandblast material on the ground outside of the side door on the south side of the property. The sandblast material has been used to fill in a hole. The facility has failed to provide any information or to demonstrate that a proper hazardous waste determination has been made on the used sandblast material.

COMPLIANCE SCHEDULE

Based upon the foregoing, Chrome East, LLC shall come into compliance with all applicable requirements of 40 CFR Parts 262, 265, 268, 273, and 279 by July 7, 2008

Respondent shall provide a written certification with supporting documentation on company letterhead confirming the noted compliance schedule has been completed. Mail this certification to Mr. Sean Morris, Environmental Senior Specialist at Mooresville Regional Office, 610 East Center Avenue, Suite 301, Mooresville, NC 28115 by the noted compliance date.

Additionally, it was determined that Chrome East LLC had operated as a large quantity generator during February 2008 and had not paid an annual fee for the specified period. The facility manifested 2145-gallons of D007 waste and 165-gallons of D003 waste to Chemtron Corporation, EPA ID Number OHD066060609, on February 15, 2008. Chrome East LLC shall pay the annual fee of \$1000.00 for the state fiscal year 2007-2008. Payment should be sent to Ms. Helen Cotton at NCDENR-DWM, 1646 Mail Service Center, Raleigh, N.C. 27699-1646. Questions concerning fee payment should be directed to Ms. Cotton at (919) 508-8537.

Compliance with this NOV will not divest the Section of its authority to issue an administrative penalty for the violations cited herein. Pursuant to N.C. General Statutes 130A-22(a) and 15A NCAC 13A .0701-.0707, an administrative penalty of up to \$32,500.00 per day may be assessed for violation of the hazardous waste law or regulations.

If you have any questions concerning this matter, you may contact Mr. Sean Morris at (704) 663-1699 at extension 2155.

Sincerely,

aleth W. Cannon

Elizabeth W. Cannon, Chief Hazardous Waste Section

cc: Mike Williford Brent Burch Helen Cotton Sean Morris Central Files





NC DEPT OF ENVIRONMENT & NATURAL RESOURCES DIVISION OF WASTE MANAGEMENT HAZARDOUS WASTE SECTION

RCRA INSPECTION REPORT

1.	Facility Information:	Chrome East, LLC 321 Sign Drive Concord, NC 28027-6117
2.	Facility Contact:	Mr. Jason Smith, Owner 704-784-8900
3.	Survey Participants:	Mr. Jason Smith Mr. Sean Morris, Environmental Senior Specialist
4.	Date of Inspection:	April 15, 2008
	Date of Report:	May 12, 2008
5.	Purpose of Inspection:	To determine compliance with 40 CFR 260-279.

6. Facility Description:

Chrome East, LLC is located in Concord, NC. The facility has around 6-employees. The facility has been in operation at this location for the last 12-months. Facility operations include decorative chrome plating of small motorcycle parts. The facility generates hazardous waste from wastewater plating sludge, waste acids, waste metal solutions, and waste solvents. The facility does use cyanide solutions on occasion. The cyanide-plating bath is equipped with its own secondary containment area so that a release would not come in contact with other plating solutions. The plating area has been equipped with a 6-12 inch berm around the plating tanks.

The facility has changed ownership and changed locations since the last inspection conducted on 4/4/07. The facility was previously located at 744-D Central Drive, Concord, NC 28027. The facility is currently operating as a conditionally exempt small quantity generator (CESQG). The facility generates hazardous waste only during tank clean-outs. All parts are rinsed over the rinse baths so that rinse water is returned to the rinse process tanks. There was not any hazardous waste onsite at the time of the inspection. The facility will generate hazardous waste from the change out of the sulfuric acid/water dip tank (150-gallons) and the nitric acid dip tank (25-gallons). Both tanks are changed out on an approximate annual basis. I explained that if the facility generates more than 220-pounds of hazardous waste in a calendar month the facility must notify to the appropriate generator status. I directed Mr. Smith to the EPA Form 8700-12 and explained the difference in each of the generator statuses at the time of the inspection.

After the Chrome East moved to the current location, it was determined that a large amount of plating solutions could no longer be used and the materials were determined to be a hazardous waste. On 2/15/08 the facility manifested 2145-gallons of D007 waste and 165-gallons of D003 waste to Chemtron Corporation – OHD 066060609. The material was collected and transported by Haz-Mat Transportation & Disposal – NCR000003186. The manifest tracking number is 004128505. The amount of hazardous waste generated shows the facility should have notified as a large quantity generator (LQG) using EPA Form 8700-12, and has failed to pay the \$1000.00 notification fee for a LQG (see deficiency section). A copy of the manifest was obtained at the time of the inspection.

During the inspection an area of sand was observed on the south side of the building near the side entrance and garage door at the facility. Mr. Smith explained that the sand was blast media from an older sandblasting machine. The sand had been used to fill in a drainage hole. The sand was spread over an approximately 10'x10' area and was a few inches deep. There was not any information available to show that a hazardous waste determination had been conducted on the waste sandblast material (see deficiency section). While onsite Mr. Smith explained that the material would be excavated, containerized, and sampled for TCLP metals on the day of the inspection. Mr. Smith contacted a local analytical laboratory to secure arrangements for the sampling. Digital photos were taken of the sandblast waste at the time of the inspection.

7. <u>Waste Type</u>:

D007 – hazardous waste liquid (chromium) D003 – waste cyanide solution (copper cyanide)

8. <u>Site Deficiencies</u>:

GS 130A-294.1 (e) - Chrome East, LLC is in violation of this regulation in that the facility has generated more than 1000-kilograms (2,200 pounds) of hazardous waste per calendar month and the facility did not properly notify as a large quantity generator of hazardous waste (LQG) and did not pay the annual fee of \$1000.00. It was determined that Chrome East LLC has operated as a large quantity generator during February 2008 and had not paid an annual fee for the specified periods. The facility manifested 2145-gallons of D007 waste and 165-gallons of D003 waste to Chemtron Corporation, EPA ID Number OHD066060609, on February 15, 2008. Chrome East LLC shall pay the annual fee of \$1000.00 for the year 2008. Payment and notification should be sent to Ms. Helen Cotton at NCDENR-DWM, 1646 Mail Service Center, Raleigh, N.C. 27699-1646. Questions concerning fee payment should be directed to Ms. Cotton at (919) 508-8537

• 40 CFR 262.11 – Chrome East, LLC is in violation of this regulation in that there was an area of used sandblast material on the ground outside of the side door on the south side of the property. The sandblast material has been used to fill in a hole. The facility has failed to provide any information to show that a proper hazardous waste determination has been made.

9. <u>Reminders:</u>

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• It is a reminder that a generator status determination must be made. If the facility generates more than 220-pounds of hazardous waste during any calendar month the facility must notify to the appropriate generator status using EPA Form 8700-12.

(SENT BY CERTIFIED MAIL) FACILITY CONTACT

cc: MRO Files Brent Burch, Western Area Compliance Supervisor Central Office Files Jason Smith, Chrome East, LLC



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North Carolina

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PO Box 29622 Raleigh, NC 27626-0622 (919)807-2000

Date: 4/18/2008

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Corporation Names

Name	Name Type
NC ChromeEast, LLC	Legal
mited Liability Company In	formation
SOSID:	1015345
Status:	Current-Active
Date Formed:	12/5/2007
Citizenship:	Domestic
State of Inc.:	NC
Duration:	Perpetual
egistered Agent	
Agent Name:	Bernath, Lonny
Registered Office Address:	5113 Piper Station Drive Suite 206 Charlotte NC 28277
Registered Mailing Address:	5113 Piper Station Drive Suite 206 Charlotte NC 28277
Principal Office Address:	5113 Piper Station Drive Suite 206 Charlotte NC 28277
	5113 Piper Station Drive Suite 206

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NC DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES DIVISION OF WASTE MANAGEMENT HAZARDOUS WASTE SECTION ACTIVITY REPORT

Date: _ч	15/08	Reported by:	SEAN	MORAS		-
Subject: _	CHROM	E EAST , LI Name of Company or pers	-C. on in violation			_
Location:	321 510	Site address	0 N COZD	NC 2802	2-6117	
Mailing Ac	idress:	If Different than location		<u> </u>		
City:		County: <u>Cas</u>	ARR25	Zip Code: _		
Contact Po	erson:3 אין	らの) らんパイト (Owner, Operator, Manage	er, other)	L OSIAY	BERNATH -	<u>Re</u> gistern RGENT
Owner Ad	dress: <u>5113</u>	Cannot be same as Location	DR.	<u>Suite 20</u>	6	
City: <u></u>	ARLOTTE	County: MECKL	ENBUR-6	Zip Code: _	28277	
Reason fo	r Visit: <u>حصم</u>	DLIANCE INSP	EUTON			
	JIM, ADDRESS	ALPEADY HAS	AN_	EPA ID NO	20 991 302	<u>2 5</u> 42.

Activity type: (Circle One) Complaint (04) Technical Assistance (CAV) Comprehensive evaluation (CEI) Case development (CDI)

Used oil (UOI) Sampling (SPL) Compliance schedule (CSE)

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	UNIFORM HAZARDOUS WASTE MANIFEST	2. Page 1 of	3. Eme	rgency Response <u>4- '</u> 784	-870	$0 \begin{vmatrix} 4. \text{ Manifest} \\ 0 \end{vmatrix}$		2850	5 J .	JK
	5. Generator's Name and Mailing Address (704-267-4-336) 321 Sign Drive Generator's Site Address (if different than mailing address) Generator's Site Address (if different than mailing address) Generator's Site Address (if different than mailing address)									
	6. Transporter 1 Company Name HAZ-MAT Transporter 2 Company Name							0003,	186	
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	8. Designated Facility Name and Site Address (440-937-6348) Chemtron Cl 35850 Schn AVON, OHic	Orpor. Leider	tio	N urt				606		9
	9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazaro Class, ID Number,	<u> </u>	FO	10. Contair	1	11. Total	12. Unit		Waste Code	
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	3. /				-					
	4.									
	14. Special Handling Instructions and Additional Information									
	9.A ERG#171 9.B ERG#157									
	 GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this i marked and labeled/placarded, and are in all respects in proper condition for transport acco Exporter, I certify that the contents of this consignment conform to the terms of the attached 	ording to applica	able inte	mational and natio						
	I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large Generator's/Offeror's Printed/Typed Name	e quantity gene Sign		(b) (if I am a sme	Il quantity ge	nerator) is true.		Mont	h Day	Year
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	18a. Discrepancy Indication Space Quantity Type		C	Residue		Partial Reje	ection	C	- Full Reje	ction
Ŀ.	18b. Alternate Facility (or Generator)	<u> </u>	Ma	inifest Reference	Number:	U.S. EPA ID N	umber			
FACIL	Facility's Phone:				-	1				
DESIGNATED FACILITY	18c. Signature of Alternate Facility (or Generator)							Mon	th Day	Year
ESIG	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatm 1. 12.	nent, disposal, 3.	and recy	rcling systems) -	•	• 4.				
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered Printed/Typed Name	l by the manife Signa	· · ·	t as noted in Item	18a		····	Mont	h Day	Year
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:PA	Form 8700-22 (Rev. 3-05) Previous editions are obsolete.	DE	SIGN	ATED FAC	ILITY T	O DESTINA	TION	STATE (I	F REQU	JIRED)

Division of Waste Management Hazardous Waste Section <u>Complaint Information</u>

Cor	npliant:
	DISPOSING OF PLATING PINSE SOLUTIONS
	IN TOILET.
*	COMPLAINT INVESTIGATION INCLUDED W/ CSE REPORT
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	CONCORD INC
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	Caller Information
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Pho	ne: (H)(W)
Rec	eived by: <u>S. MOPRIS</u> Date: <u>Gli7/08</u>
Refe	erred To: <u>BEVERLY METCOLF - WSACL PRE-TRENT</u> Date:
cc:	Brent Burch or Ted Cashion

7/25/08

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BEVERLY METCONF

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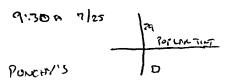
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Subject: Chrome East complaint. From: Brent Burch <Brent.Burch@ncmail.net> Date: Mon, 23 Jun 2008 14:38:56 -0400 To: Sean Morris <sean.morris@ncmail.net>

B. METCALF - 788-4164 × 12

Sean,

Spoke to Mike. He agreed with our plan. You or the city can contact the complainant and see if he/she can tell them when the discharge may happen and we will hold off until they can get a sample. If he/she is not able to do so, go ahead to the facility with Brian and XRF the sandblast debris and conduct the discharge complaint investigation....Brent

Brent Burch < Brent.Burch@ncmail.net>

Western Area Compliance Supervisor

NCDENR - Hazardous Waste Section

Glialog - Spoke ~ IBEVERLYK METCRIF UI CABAPRUS COUNTY PRE-TREATMENE. EXPLAINED COMPLAINT. SHE IS GOING TO CHECK WI CITY TO SEE IF THEY CAN SAMPLE. FROM POTW.

- 107/1/03 LEFT MESSAGE FOR B. METCALE AND GAVE HER THE COMPLAINANT PHONE #. TOLD HER COMPLAINANT WANTS TO STAY ANONIMOUS. SORE
 - 7/15/08 XEVIN LADOWTE / EPA CO) CALLED TO DISCUSS COMPLANT. HE WAS CONTACTED BY BEVERLOY METCALF. MR. LADONTE WAS NOT GOING TO INVESTIGATE UNLESS WE FIND MORE EVIDENCE.

Subject: Complaint concerning improper disposal of electroplating waste liquid containing potentially hazardous substances in Concord, NC (Cabbarus County)

From: David Hance <david.hance@ncmail.net>

Date: Tue, 17 Jun 2008 15:47:15 -0400

To: Elizabeth Cannon <Elizabeth.Cannon@ncmail.net>, Sean Morris <Sean.Morris@ncmail.net>, Rob Krebs <Rob.Krebs@ncmail.net>

CC: Edythe McKinney <e dythe.mckinney@ncmail.net>

Hello,

At 11:39 AM today the NC DENR Customer Service staff recieved a compliant concerning improper disposal of liquid wastes at an electroplating and metals finishing operation. This email is being sent to the Division of Waste Management - Hazardous Waste Section staff to determine if any violations of laws and rules have occurred and to address any improper waste handling issues. This email is also being sent to the Division of Water Quality - Surface Water Protection staff to determine if there are any issues related to NPDES discharge limits, pretreatment requirements, surface water standards, or other environmental impacts to surface waters. It has been sent to both regional and central office staffs.

The person making the complaint wants to remain anonymous.

The complainant stated to me that Chrome East LLC of 321 Sign Drive in Concord, NC (Phone: 704-784-8900) is disposing of electroplating rinse tank water in a manner inconsistent with best management and environmental rules. The location of this business in inside the City Limits of Concord, NC. This facility does metal finishing and electroplating mostly for car parts. According to the USEPA Environfacts Data Warehouse, the Handler Number for a facility identified in that database as Chrome East is NCS000000526 and the Facility Registry System shows this site to be under ID Number 110031422306. The manager of this facility was identified under the name of "Jason Smith".

According to the complaint, Chrome East LLC is taking rinse water used in washing electroplated parts and discharging that to a rinse tank. The complainant stated that they are using a siphonage device on this rinse tank and sending the rinse water down into a commode. The water then proceeds through the building sewers and out into the disposal system. This rinse water may contain pesticides, chrome, copper, and nickel from plating operations - depending on recent operations at the facility. The person making the complaint estimated that an average of two to three "heavy duty truck beds" of this liquid is being discharged per month with a maximum of five truck beds per month and the rinse water is completely emptied out of the rinse tank every time this is done. When asked, the person making the complaint does not know of any pretreatment wastewater treatment operations at this facility.

It is requested that the Division of Waste Management staff look into this matter to determine if there are any violations of its rules, permit conditions, and if subsequent actions are needed. It is requested that the Division of Water Quality-Surface Water Protection staff look into the impacts of discharges on waste water treatment and surface waters in the Concord, North Carolina area.

I have the contact information for the person making the complaint and if you need to discuss this with me, call me at my phone number below.

David Hance Env. Spec. DENR Customer Service 919-733-0493

COMPLANANT

BEVERNEY 12 704.788.4164 x @

Date: $\frac{7/3/08}{500}$ Site Name: CM80M2 EAST Address: County: CADDRESS County: CADDRESS Contact / Phone #: Contact #: Cont	Date: $\frac{7/3/08}{5000}$ Site Name: CHRONG EAST Address: County: CAPPORENS Contact / Phone #: Participants: BRIAN PALK Show Palk Weather Conditions: Notes: K CHRONG X SARIAN HYDRAW X SA			Inspection No.	***		6/2/08 991 702
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NC DWQ-Aquifer	Protection

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Inspection Notes

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Site Drawing:

Referrals:

NC DWQ-Aquifer Protection	
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Solid Waste Section	
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Complaint Form

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SAMPLES COLLECTER BY BRIAN POLK

Mr. Brian Polk NCDENR-Division of Waste Mgmt. 401 Oberlin Rd. Suite 150 Raleigh NC 27605 Report Number: G443-515

Client Project: Chrome East

Dear Mr. Polk:

Enclosed are the results of the analytical services performed under the referenced project. The samples are certified to meet the requirements of the National Environmental Laboratory Accreditation Conference Standards. Copies of this report and supporting data will be retained in our files for a period of five years in the event they are required for future reference. Any samples submitted to our laboratory will will be retained for a maximum of thirty (30) days from the date of this report unless other arrangements are requested.

If there are any questions about the report or the services performed during this project, please call SGS at (910) 350-1903. We will be happy to answer any questions or concerns which you may have.

Thank you for using SGS Environmental Services for your analytical services. We look forward to working with you again on any additional analytical needs which you may have.

Sincerely, SGS Environmental Services, Inc.

7/16/09) Date Lori Lockamy



List of Reporting Abbreviations and Data Qualifiers

- B = Compound also detected in batch blank
- BQL = Below Quantitation Limit (RL or MDL)
- DF = Dilution Factor
- Dup = Duplicate
- D = Detected, but RPD is > 40% between results in dual column method.
- E = Estimated concentration, exceeds calibration range.
- J = Estimated concentration, below calibration range and above MDL
- LCS(D) = Laboratory Control Spike (Duplicate)
- MDL = Method Detection Limit
- MS(D) = Matrix Spike (Duplicate)
- PQL = Practical Quantitation Limit
- RL/CL = Reporting Limit / Control Limit
- **RPD = Relative Percent Difference**
- mg/kg = milligram per kilogram, ppm, parts per million
- ug/kg = micrograms per kilogram, ppb, parts per billion
- mg/L = milligram per liter, ppm, parts per million
- ug/L = micrograms per liter, ppb, parts per billion
- % Rec = Percent Recovery
- % soilds = Percent Solids

Special Notes:

- 1) Metals and mercury samples are digested with a hot block, see the standard operating procedure document for details.
- 2) Uncertainty for all reported data is less than or equal to 30 percent.



Client Sample ID: Client Project ID: Lab Sample ID: Lab Project ID: Batch ID:	t Project ID: Chrome East Sample ID: G443-515-4 Project ID: G443-515					DCP 7/3/2008 00:00 7/8/2008 Leachate
Metals TCLP	Result	RL	DF	Units	Method	Date Analyzed
Arsenic	BQL	0.200	1	MG/L	6010B	7/15/2008
Barium	BQL	5.00		MG/L	6010B	7/15/2008
Cadmium	BQL	0.100	1	MG/L	6010B	7/15/2008
Chromium	BQL	0.100	1	MG/L	6010B	7/15/2008
Lead	0.195	0.100	1	MG/L	6010B	7/15/2008
Mercury	BQL	0.000570	1	MG/L	7470	7/10/2008
Selenium	BQL	0.200	1	MG/L	6010B	7/15/2008
Silver	BQL	0.100	1	MG/L	6010B	7/15/2008

Comments

BQL = Below Quantitation Limits DF = Dilution Factor J = Between MDL and RL B= Amount in Prep Blank > MDL







.

Client Sample ID:	tub 2				Analyzed By:	DCP	
Client Project ID:	Chrome Ea	ast			Date Collected:	7/3/2008 00:00	
Lab Sample ID:	G443-515-	-5			Date Received:	7/8/2008	
Lab Project ID:	G443-515				Matrix:	Leachate	
Batch ID:	11843 118	45					
Metals	Result	RL	DF	Units	Method	Date	
TCLP						Analyzed	
Arsenic	BQL	0.200	1	MG/L	6010B	7/15/2008	
Barium	BQL	5.00	1	MG/L	6010B	7/15/2008	
Cadmium	BQL	0.100	1	MG/L	6010B	7/15/2008	
Chromium	BQL	0.100	1	MG/L	6010B	7/15/2008	
	Duc						
Lead	BQL	0.100	1	MG/L	6010B	7/15/2008	

1

1

MG/L

MG/L

6010B

6010B

7/15/2008

7/15/2008

Comments

Selenium

Silver

BQL = Below Quantitation Limits DF = Dilution Factor J = Between MDL and RL B= Amount in Prep Blank > MDL

.

• :

BQL

BQL

0.200

0.100







Client Sample ID:	tub 3				Analyzed By:	DCP
Client Project ID:	Chrome Ea	ast			Date Collected:	7/3/2008 00:00
Lab Sample ID:	G443-515-	6			Date Received:	7/8/2008
Lab Project ID:	G443-515				Matrix:	Leachate
Batch ID:	11843 118	45				
	Desult		Dr	11		Dete
Metals TCLP	Result	RL	DF	Units	Method	Date Analyzed
						Analynou
Arsenic	BQL	0.200	1	MG/L	6010B	7/15/2008
Barium	BQL	5.00	1	MG/L	6010B	7/15/2008
Cadmium	BQL	0.100	1	MG/L	6010B	7/15/2008
Chromium	BQL	0.100	1	MG/L	6010B	7/15/2008
Lead	BQL	0.100	1	MG/L	6010B	7/15/2008
Mercury	BQL	0.000570	1	MG/L	7470	7/10/2008
Selenium	BQL	0.200	1	MG/L	6010B	7/15/2008
Silver	BQL	0.100	1	MG/L	6010B	7/15/2008

Comments

BQL = Below Quantitation Limits DF = Dilution Factor J = Between MDL and RL B= Amount in Prep Blank > MDL





Client Sample ID:	Lab Blank	Analyzed By:	PSW
Client Project ID:		Date Collected:	
Lab Sample ID:	pb11845	Date Received:	
Lab Project ID:		Matrix:	Leachate
Batch ID:	11845		

Metals TCLP	Result	RL	DF	Units	Method	Date Analyzed
Arsenic	BQL	0.200	1	MG/L	6010B	7/15/2008
Barium	BQL	5.00	1	MG/L	6010B	7/15/2008
Cadmium	BQL	0.100	1	MG/L	6010B	7/15/2008
Chromium	BQL	0.100	1	MG/L	6010B	7/15/2008
Lead	BQL	0.100	1	MG/L	6010B	7/15/2008
Selenium	BQL	0.200	1	MG/L	6010B	7/15/2008
Silver	BQL	0.100	1	MG/L	6010B	7/15/2008

Comments

BQL = Below Quantitation Limits DF = Dilution Factor J = Between MDL and RL B= Amount in Prep Blank > MDL







Client Sample ID: Client Project ID: Lab Sample ID:	Lab Blank pb11843				Analyzed By: Date Collected: Date Received:	DCP
Lab Project ID: Batch ID:	11843				Matrix:	Leachate
Metals TCLP	Result	RL	DF	Units	Method	Date Analyzed
Mercury	BQL	0.000570	1	MG/L	7470	7/10/2008

Comments BQL = Below Quantitation Limits DF = Dilution Factor J = Between MDL and RL B= Amount in Prep Blank > MDL





METALS Results for LCS/LCD

.

ICP Batch: 11845 HG Batch: 11843 Other: Matrix: WATER Units: MG/L

						Li	mit		
Analyte	TRUE Value	LCS	LCS %REC	LCD	LCD %REC	Lower	Upper	RPD	RPD Limit
Arsenic	4.00	4.05	101	4.07	102	80	120	0.493	20
Barium	20.0	19.8	99.0	19.5	97.5	80	120	1.53	20
Cadmium	4.00	3.93	98.3	3.92	98.0	80	120	0.255	20
Chromium	4.00	3.97	99.3	3.94	98.5	80	120	0.759	20
Lead	4.00	3.92	98.0	3.88	97.0	80	120	1.03	20
Mercury	0.0142	0.0137	96.5	0.0134	94.4	80	120	2.21	20
Selenium	4.00	3.91	97.8	3.93	98.3	80	120	0.510	20
Silver	4.00	3.83	95.8	3.83	95.8	80	120	0	20

Comments

*=Out of Limits

NA = Not applicable, due to sample concentration greater than three times spike concentration

Reviewed By:





MS/MSD Results for METALS

Lab ID: G443-515-4 MS Lab ID: G443-515-4 MSD Lab ID: G443-515-4 ICP Batch: 11845 HG Batch: 11843 Other: 1530 Analyzed By: DCP Matrix: Leachate Units: MG/L

					_			Li	mit		
Analyte	Sample Result	SA MS	MS Result	MS %REC	SA MSD	MSD Result	MSD %REC	Lower	Upper	RPD	RPD Limi
Arsenic	BQL	4.00	3.98	99.5	4.00	4.09	102	75	125	2.73	20
Barium		20.0	20.1	101	20.0	20.1	101	75	125	0	20
Cadmium	BQL	4.00	3.94	98.5	4.00	4.01	100	75	125	1.76	20
Chromium	BQL	4.00	3.97	99.3	4.00	3.98	99.5	75	125	0.252	20
Lead	0.195	4.00	3.99	94.9	4.00	4.02	95.6	75	125	0.749	20
Mercury	BQL	0.0142	0.0138	96.8	0.0142	0.0136	95.8	85	115	1.46	20
Selenium	BQL	4.00	3.70	92.5	4.00	3.90	97.5	75	125	5.26	20
Silver	BQL	4.00	3.81	95.3	4.00	3.85	96.3	75	125	1.04	20

Comments

*=Out of Limits

1

NA = Not applicable, due to sample concentration greater than three times spike concentration

Reviewed By: 202



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• Ohio • Maryland
• New Jersey • North Carolina
• West Virginia

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Brian INVOICE TO:	Polk		8281 22				C= COMP G= GRAB	3	, /		' /		/ /	/ /		' 	/ /				
2 Linda LAB NO.	Cul peoples SAMPLE IDENTII			TIME	MATRIX	N E R S		R	Ĭ/							/		REMAF	RKS		
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5 Collected/Re	linquished By:(1)	Date	Time	Received	By:	Date	Time) Shi	pping C	arrier:				Sarr	ples R	eceive	d Cold? (C	irc(e) Y	EŚ ,	10	┥
Bun	Afr	57/3		Apr		7/8/08	1010	Shi	pping 1	icket N	10:			Tem	peratu	re [C:_	55	de T_			
Relinquished	1 By: (2)	Date	Time 🧹	Received	Ву:	Date	Time		ecial De	liverat	ole Req	luireme	ents:	Cha INT	~	ustodi	y Seal: (Cir BROKEN	·	A	BSENT	
Relinquished	t By: (3)	Date	Time	Received	By:	Date	Time	Spe	ecial In:	structio	ons:			<u></u>				κ.			
Relinquished	I By: (4)	Date	Time	Received	By:	Date	Time		RUS				e Needa	ed		- /	STD				

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White - Retained by Lab Yellow - Returned with Report Pink - Retained by Sampler



Pace Analytical Services, Inc. 9800 Kincey Ave. Suite 100 Huntersville, NC 28078 (704)875-9092

June 18, 2008

Mr. Jason Smith Chrome East 321 Sign Drive Concord, NC 28027 TOTAL METAL SCAN

RE: Project: CHROME EAST - BLAST MEDIA

Pace Project No.: 9219155

Dear Mr. Smith:

Enclosed are the analytical results for sample(s) received by the laboratory between May 13, 2008 and June 11, 2008. The results relate only to the samples included in this report. Results reported herein conform to the most current NELAC standards, where applicable, unless otherwise narrated in the body of the report.

Inorganic Wet Chemistry and Metals analyses were performed at our Pace Asheville laboratory and Organic testing was performed at our Pace Huntersville laboratory unless otherwise footnoted. All Microbiological analyses were performed at the laboratory where the samples were received.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Brend Pathanmarky

Brenda Pathammavong

brenda.pathammavong@pacelabs.com Project Manager

Enclosures

REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: CHROME EAST - BLAST MEDIA Pace Project No.: 9219155

Charlotte Certification IDs

Florida/NELAP Certification Number: E87627 Kansas Certification Number: E-10364 Louisiana/LELAP Certification Number: 04034 North Carolina Drinking Water Certification Number: 37706 North Carolina Wastewater Certification Number: 12

Asheville Certification IDs

Florida/NELAP Certification Number: E87648 Louisiana/LELAP Certification Number: 03095 New Jersey Certification Number: NC011 North Carolina Drinking Water Certification Number: 37712 North Carolina Wastewater Certification Number: 40 North Carolina Bioassay Certification Number: 9 North Carolina Field Services Certification Number: 5342 South Carolina Certification Number: 990060001 South Carolina Bioassay Certification Number: 990060003 Tennessee Certification Number: 04010 Virginia Certification Number: 00213

Pennsylvania Certification Number: 68-03578 South Carolina Certification Number: 99030001 South Carolina Bioassay Certification Number: 99030002 Tennessee Certification Number: 2980 Virginia Certification Number: 00072

Eden Certification IDs

North Carolina Drinking Water Certification Number: 37738 Virginia Drinking Water Certification Number: 00424 North Carolina Wastewater Certification Number: 633

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SAMPLE ANALYTE COUNT

Project: CHROME EAST - BLAST MEDIA Pace Project No.: 9219155

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
9219155001	BLAST MEDIA	EPA 6010	SHB	29	PASI-A
		EPA 7470	EWS	1	PASI-A
9219155002	Blast Media - Total Run	ASTM D2974-87	TNM	1	PASI-C
		EPA 6010	JMW	29	PASI-A
		EPA 7471	EWS	1	PASI-A

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ANALYTICAL RESULTS

Project: CHROME EAST - BLAST MEDIA

Pace Project No.: 9219155

Sample: BLAST MEDIA	Lab ID: 9219	155001	Collected: 05/13/08	3 08:30	Received: 0	5/13/08 09:30	Matrix: Solid	
Results reported on a "wet-weight	" basis							
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qua
6010 MET ICP, TCLP	Analytical Meth	od: EPA 6	010 Preparation Metho	od: EP/	A 3010			
Aluminum	ND mg	/L	0.50	1	05/20/08 09:20	05/21/08 01:0	9 7429-90-5	
Antimony	ND mg	/L	0.025	1	05/20/08 09:20	05/21/08 01:0	9 7440-36-0	
Arsenic	ND mg	/L	0.025	1	05/20/08 09:20	05/21/08 01:0	9 7440-38-2	
Barium	0.029 mg	′L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-39-3	
Beryllium	ND mg	/L	0.0050	1	05/20/08 09:20	05/21/08 01:09	9 7440-41-7	
Boron	0.74 mg		0.050	1	05/20/08 09:20	05/21/08 01:0	9 7440-42-8	
Cadmium	ND mg		0.0050	1	05/20/08 09:20	05/21/08 01:0	7440-43-9	
Calcium	2.4 mg		0.50	1	05/20/08 09:20	05/21/08 01:09	9 7440-70-2	
Chromium	ND mg		0.025	1	05/20/08 09:20	05/21/08 01:0	7440-47-3	
Cobalt	ND mg		0.025	1	05/20/08 09:20	05/21/08 01:09	3 7440-48-4	
Copper	ND mg		0.025	1		05/21/08 01:09		
Iron	0.30 mg		0.25	1		05/21/08 01:09		
Lead	ND mg		0.025	1		05/21/08 01:09		
Magnesium	ND mg		0.50	1		05/21/08 01:09		
Manganese	0.031 mg		0.025	1		05/21/08 01:09		
Molybdenum	ND mg		0.025	1		05/21/08 01:09		
Nickel	ND mg		0.025	1		05/21/08 01:09		
Potassium	ND mg		25.0	1		05/21/08 01:09		
Selenium	ND mg		0.050	1		05/21/08 01:09		
Silica	1.9 mg		1.0	1		05/21/08 01:09		
Silicon	0.87 mg		0.50	1		05/21/08 01:08		
Silver	ND mg		0.025	1		05/21/08 01:09		
Sodium	563 mg/		25.0	1		05/21/08 01:09		
Strontium	ND mg		0.025	1		05/21/08 01:09		
Thallium	-							
	ND mg		0.050	1		05/21/08 01:09		
Tin Filonium	ND mg/		0.025	1		05/21/08 01:09		
Titanium (apadium	ND mg		0.025	1		05/21/08 01:09		
Vanadium	ND mg/		0.025	1		05/21/08 01:09		
Zinc	0.078 mg/		0.050	1		05/21/08 01:09	7440-66-6	
470 Mercury, TCLP	Analytical Metho	od: EPA 74	470 Preparation Metho	d: EPA	7470			
Mercury	ND ug/l	-	0.20	1	05/20/08 10:35	05/20/08 14:21	7439-97-6	
amples Blact Modia Total Dur	Lab ID: 0040	55000	Collected 05140100	09.20	Desekverk, Of	144/00 40:00		
Sample: Blast Media - Total Run Results reported on a "dry-weight"	Lab ID: 9219 <i>' basis</i>	199002	Collected: 05/13/08	08:30	Received: 06	011/08/10:28	Matrix: Solid	
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qua
6010 MET ICP	Analytical Metho	d: EPA 60	D10 Preparation Metho	d: EPA	3050	— <u>—</u>		
Numinum	, 7.2 mg/		5.4			06/17/08 11:51	7429-90-5	
Antimony	ND mg/	-	0.27			06/17/08 11:51		
Arsenic	ND mg/		0.27			06/17/08 11:51		
Barium	ND mg/		0.27			06/17/08 11:51		
Populium	ND mg/	•	0.27		00/10/00 10:05	00/11/00 11:01	1440-38-3	

Date: 06/18/2008 10:10 AM

Beryllium

Boron

REPORT OF LABORATORY ANALYSIS

0.054

0.54

1

1

ND mg/kg

0.84 mg/kg

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06/16/08 16:05 06/17/08 11:51 7440-41-7

06/16/08 16:05 06/17/08 11:51 7440-42-8

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ANALYTICAL RESULTS

Project: CHROME EAST - BLAST MEDIA

Pace Project No.: 9219155

Sample: Blast Media - Total Run	Lab ID: 92191	55002	Collected: 05/	13/08 08:	30	Received: 06	5/11/08 10:28	Matrix: Solid	
Results reported on a "dry-weight"	basis								
Parameters	Results	Units	Report Lin	it DF		Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical Method	l: EPA 60'	10 Preparation	Method: E	EPA 3	050			
Cadmium	ND mg/kg	3	0.0	54 1	0	6/16/08 16:05	06/17/08 11:51	7440-43-9	
Calcium	59.2 mg/kg	3	5	.4 1	0	6/16/08 16:05	06/17/08 11:51	7440-70-2	
Chromium	0.29 mg/kg	3	0.	27 1	0	6/16/08 16:05	06/17/08 11:51	7440-47-3	
Cobalt	ND mg/kg	J	0.:	27 1	0	6/16/08 16:05	06/17/08 11:51	7440-48-4	
Copper	ND mg/kg	3	0.:	27 1	0	6/16/08 16:05	06/17/08 11:51	7440-50-8	
Iron	38.7 mg/kg	J	2	.7 1	00	6/16/08 16:05	06/17/08 11:51	7439-89-6	
Lead	0.52 mg/kg	3	0.	27 1	0	6/16/08 16:05	06/17/08 11:51	7439-92-1	
Magnesium	13.1 mg/kg	3	5	.4 1	00	6/16/08 16:05	06/17/08 11:51	7439-95-4	
Manganese	0.61 mg/kg	}	0.:	27 1	00	6/16/08 16:05	06/17/08 11:51	7439-96-5	
Molybdenum	ND mg/kg		0.:	27 1	00	6/16/08 16:05	06/17/08 11:51	7439-98-7	
Nickel	ND mg/kg	J	0.:	27 1	06	6/16/08 16:05	06/17/08 11:51	7440-02-0	
Potassium	ND mg/kg	,	20	i 69	06	6/16/08 16:05	06/17/08 11:51	7440-09-7	
Selenium	ND mg/kg)	0.9	64 1	06	6/16/08 16:05	06/17/08 11:51	7782-49-2	
Silica	77.8 mg/kg]	1	.1 1	06	6/16/08 16:05	06/17/08 11:51	7631-86-9	
Silicon	36.4 mg/kg)	5	.4 1	06	6/16/08 16:05	06/17/08 11:51	7440-21-3	
Silver	1.4 mg/kg	1	0.3	.7 1	06	6/16/08 16:05	06/17/08 11:51	7440-22-4	
Sodium	ND mg/kg	1	20	i9 1	06	6/16/08 16:05	06/17/08 11:51	7440-23-5	
Strontium	ND mg/kg	I	0.3	7 1	06	6/16/08 16:05	06/17/08 11:51	7440-24-6	
Thallium	ND mg/kg	ļ	0.9	4 1	06	6/16/08 16:05	06/17/08 11:51	7440-28-0	
Fin	ND mg/kg	1	2	.7 1	06	6/16/08 16:05	06/17/08 11:51	7440-31-5	
Fitanium	1.1 mg/kg	1	0.2	7 1	06	6/16/08 16:05	06/17/08 11:51	7440-32-6	
/anadium	ND mg/kg	1	0.2	7 1	06	6/16/08 16:05	06/17/08 11:51	7440-62-2	
Zinc	2.1 mg/kg	1	0.5	4 1	06	6/16/08 16:05	06/17/08 11:51	7440-66-6	
471 Mercury	Analytical Method:	EPA 747	1 Preparation N	lethod: E	PA 74	471			
Mercury	ND mg/kg		0.003	5 1	06	5/13/08 13:30	06/13/08 15:12	7439-97-6	H1
Percent Moisture	Analytical Method:	ASTM D	2974-87						
Percent Moisture	ND %		0.1	01			06/12/08 16:18		

Date: 06/18/2008 10:10 AM

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

	ROME EAST 9155	- BLAST MEDIA						
QC Batch: M	ERP/1482		Analysis M	ethod:	EPA 7470			
QC Batch Method: EF	PA 7470		Analysis De	escription:	7470 Mercury To	CLP		
Associated Lab Samples	: 9219155	001						
METHOD BLANK: 116	517							
Associated Lab Samples	92191550	001						
– .			Blank	Reporting				
Parameter		Units	Result	Limit	Qualifiers	_		
Mercury		ug/L	ND	0.2	20			
LABORATORY CONTRO	DL SAMPLE:	116518				·		
			Spike	LCS	LCS	% Rec		
Parameter		Units	Conc.	Result	% Rec	Limits	Qualifiers	
Mercury		ug/L	2.5	2.8	111	80-120		
MATRIX SPIKE SAMPLE		116519					·····	
			9219196002	2 Spike	MS	MS	% Rec	
Parameter		Units	Result	Conc.	Result	% Rec	Limits	Qualifiers
Mercury		ug/L	i	ND 2.5	2.6	103	75-125	
SAMPLE DUPLICATE:	116520					·····		
			9219448007	Dup				
Parameter		Units	Result	Result	RPD	Qualifiers		
Mercury		ug/L	ND	.091	J 9,	4 R3		

Date: 06/18/2008 10:10 AM

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: Pace Project No.:	CHROME EAST - BLAST MEDIA 9219155		
QC Batch:	MPRP/2371	Analysis Method:	EPA 6010
QC Batch Method:	EPA 3010	Analysis Description:	6010 MET TCLP
Associated Lab Sa	mples: 9219155001		

METHOD BLANK: 116670

Associated Lab Samples: 9219155001

Parameter	Units	Blank Result	Reporting Limit	Qualifiers
Arsenic	mg/L	ND	0.025	
Barium	mg/L	ND	0.025	
Cadmium	mg/L	ND	0.0050	
Chromium	mg/L	ND	0.025	
Lead	mg/L	ND	0.025	
Selenium	mg/L	ND	0.050	
Silver	mg/L	ND	0.025	

116672

LABORATORY CONTROL SAMPLE: 116671

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Arsenic		2.5	2.6	105	80-120	
Barium	mg/L	2.5	2.3	94	80-120	
Cadmium	mg/L	2.5	2.4	96	80-120	
Chromium	mg/L	2.5	2.4	98	80-120	
Lead	mg/L	2.5	2.3	93	80-120	
Selenium	mg/L	2.5	2.7	107	80-120	
Silver	mg/L	1.2	1.2	97	80-120	

MATRIX SPIKE SAMPLE:

Parameter	Units	9219146001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Arsenic	mg/L	ND	2.5	2.6	105	75-125	
Barium	mg/L	0.29	2.5	2.6	92	75-125	
Cadmium	mg/L	ND	2.5	2.4	96	75-125	
Chromium	mg/L	ND	2.5	2.5	98	75-125	
Lead	mg/L	ND	2.5	2.3	93	75-125	
Selenium	mg/L	ND	2.5	2.7	107	75-125	
Silver	mg/L	ND	1.2	1.2	97	75-125	

SAMPLE DUPLICATE: 116673

Parameter	Units	9219146002 Result	Dup Result	RPD	Qualifiers
Arsenic		ND	ND	200	
Barium	mg/L	0.42	0.42	0	
Cadmium	mg/L	ND	.0032J	12	
Chromium	mg/L	ND	.0023J	38	
Lead	mg/L	ND	ND	0	

Date: 06/18/2008 10:10 AM

REPORT OF LABORATORY ANALYSIS

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Pace Analytical Services, Inc. 9800 Kincey Ave. Suite 100 Huntersville, NC 28078 (704)875-9092

QUALITY CONTROL DATA

Project: CHROME EAST - BLAST MEDIA

Pace Project No.: 9219155

SAMPLE DUPLICATE: 116673					
Parameter	Units	9219146002 Result	Dup Result	RPD	Qualifiers
Selenium	mg/L	ND	ND	200	
Silver	mg/L	ND	ND	16	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

· · · •	HROME EAST - BLA 219155	ST MEDIA						
	PMST/1721 ASTM D2974-87 les: 9219155002		Analysis Meth Analysis Desc			D2974-87 ight/Perce	ent Moisture	
SAMPLE DUPLICATE		11-11-	9219155002	Dup		RPD	Qualifiers	
Paramet Percent Moisture		Units	Result ND	Result	 ND	20		

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REPORT OF LABORATORY ANALYSIS

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Pace Analytical Services, Inc. 9800 Kincey Ave. Suite 100 Huntersville, NC 28078 (704)875-9092

QUALITY CONTROL DATA

/1531	Analysis Me	ethod:	EPA 7471			<u> </u>
471	Analysis De	escription:	7471 Mercury			
9219155002						
9219155002						
	Blank	Reporting				
Units	Result	Limit	Qualifiers	_		
mg/kg	ND	0.005	54			
AMPLE: 126993	<u></u> _					
Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers	
mg/kg	.067	0.056	84	80-120	<u> </u>	
126994		···				
			MS	MS	% Rec	
Units	Result	Conc.	Result	% Rec	Limits	Qualifiers
mg/kg	I	ND .069	0.065	9	4 75-12	5 H1
995					- <u></u>	
	9221012001	Dup				
Units	Result	Result	RPD	Qualifiers	;	
mg/kg	0.061	0.1	2 6	2 01		
	9219155002 Units mg/kg AMPLE: 126993 Units mg/kg 126994 Units mg/kg 995 Units	5 2/1531 Analysis Me 471 Analysis De 9219155002 9219155002 9219155002 9219155002 9219155002 Blank Result mg/kg ND AMPLE: 126993 Spike Units Conc. mg/kg .067 126994 9219155002 Units Result 9295 9221012001 Result	5 2/1531 Analysis Method: 471 Analysis Description: 9219155002 9219155002 9219155002 9219155002 9219155002 Units Result Limit mg/kg ND 0.005 AMPLE: 126993 Units Conc. Result mg/kg .067 0.056 126994 9219155002 Spike Conc. Result CS Conc. Result 0.056	5 V1531 Analysis Method: EPA 7471 Analysis Description: 7471 Mercury 9219155002 9219155002 9219155002 9219155002 Units Result Limit Qualifiers MD 0.0054 AMPLE: 126993 Units Conc. Result % Rec mg/kg .067 0.056 84 126994 9219155002 Spike MS Result Conc. Result % Rec 9219155002 Spike MS Result Result Rep 995 995	5 7/1531 Analysis Method: EPA 7471 Analysis Description: 7471 Mercury 9219155002 9219155002 9219155002 9219155002 9219155002 9219155002 9219155002 MMPLE: 126993 AMPLE: 126993 Units Spike LCS LCS % Rec Units Conc. Result % Rec Limits mg/kg .067 0.056 84 80-120 126994 9219155002 Spike MS MS Result Conc. Result % Rec 126994 9219155002 Spike MS MS Result Conc. Result % Rec 126994 9219155002 Spike MS MS Result Conc. Result % Rec 126994 9219155002 Spike MS MS 9219155002 Spike MS MS 92	5 V1531 Analysis Method: EPA 7471 Aralysis Description: 7471 Mercury 9219155002 9219155002 9219155002 Units Result Limit Qualifiers mg/kg ND 0.0054 AMPLE: 126993 Units Conc. Result % Rec LCS % Rec Units Conc. Result % Rec Limits Qualifiers mg/kg .067 0.056 84 80-120 126994 9219155002 Spike MS MS % Rec Limits mg/kg ND .069 0.065 94 75-12 995 9221012001 Dup Result RPD Qualifiers

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REPORT OF LABORATORY ANALYSIS

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Pace Analytical Services, Inc. 9800 Kincey Ave. Suite 100 Huntersville, NC 28078 (704)875-9092

QUALITY CONTROL DATA

Project: CHROME EAST - BLAST MEDIA

Pace Project No .:	9219155				
QC Batch:	MPRP/2530	Analysis Method:	EPA 6010		_
QC Batch Method:	EPA 3050	Analysis Description:	6010 MET		
Associated Lab Sam	ples: 9219155002	•		•	

METHOD BLANK: 128451

Associated Lab Samples: 9219155002

		Blank	Reporting	.
Parameter	Units	Result	Limit	Qualifiers
Aluminum	mg/kg	ND	10.0	
Antimony	mg/kg	ND	0.50	
Arsenic	mg/kg	ND	0.50	
Barium	mg/kg	ND	0.50	
Beryllium	mg/kg	ND	0.10	
Boron	mg/kg	ND	1.0	
Cadmium	mg/kg	ND	0.10	
Calcium	mg/kg	ND	10.0	
Chromium	mg/kg	ND	0.50	
Cobalt	mg/kg	ND	0.50	
Copper	mg/kg	ND	0.50	
Iron	mg/kg	ND	5.0	
Lead	mg/kg	ND	0.50	
Magnesium	mg/kg	ND	10.0	
Manganese	mg/kg	ND	0.50	
Molybdenum	mg/kg	ND	0.50	
Nickel	mg/kg	ND	0.50	
Potassium	mg/kg	ND	500	
Selenium	mg/kg	ND	1.0	
Silica	mg/kg	11.7	2.1	
Silicon	mg/kg	ND	10.0	
Silver	mg/kg	ND	0.50	
Sodium	mg/kg	ND	500	
Strontium	mg/kg	ND	0.50	
Thallium	mg/kg	ND	1.0	
Tin	mg/kg	ND	5.0	
Titanium	mg/kg	ND	0.50	
Vanadium	mg/kg	ND	0.50	
Zinc	mg/kg	ND	1.0	

LABORATORY CONTROL SAMPLE: 128452

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Aluminum	mg/kg	500	477	95	80-120	
Antimony	mg/kg	50	54.1	108	80-120	
Arsenic	mg/kg	50	49.1	98	80-120	
Barium	mg/kg	50	49.0	98	80-120	
Beryllium	. mg/kg	50	48.9	98	80-120	
Boron	mg/kg	50	51.8	104	80-120	
Cadmium	mg/kg	50	49.5	99	80-120	
Calcium	mg/kg	500	506	101	80-120	

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REPORT OF LABORATORY ANALYSIS

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Pace Analytical Services, Inc. 9800 Kincey Ave. Suite 100 Huntersville, NC 28078 (704)875-9092

QUALITY CONTROL DATA

Project: CHROME EAST - BLAST MEDIA

Pace Project No.: 9219155

LABORATORY CONTROL SAMPLE: 128452

		Spike	LCS	LCS	% Rec	
Parameter	Units	Conc.	Result	% Rec	Limits	Qualifiers
Chromium	mg/kg	50	49.8	100	80-120	
Cobalt	mg/kg	50	48.9	98	80-120	
Copper	mg/kg	50	49.5	99	80-120	
Iron	mg/kg	500	492	98	80-120	
Lead	mg/kg	50	49.8	100	80-120	
Magnesium	mg/kg	500	484	97	80-120	
Manganese	mg/kg	50	49.7	99	80-120	
Molybdenum	mg/kg	50	52.7	105	80-120	
Nickel	mg/kg	50	49.4	99	80-120	
Potassium	mg/kg	500	454J	91	80-120	
Selenium	mg/kg	50	48.9	98	80-120	
Silica	mg/kg		555			
Silicon	mg/kg	250	259	104	80-120	
Silver	mg/kg	25	26.3	105	80-120	
Sodium	mg/kg	500	491J	98	80-120	
Strontium	mg/kg	50	49.8	100	80-120	
Thallium	mg/kg	50	46.7	93	80-120	
Tin	mg/kg	50	54.6	109	80-120	
Fitanium	mg/kg	50	54.1	108	80-120	
Vanadium	mg/kg	50	49.6	99	80-120	
Zinc	mg/kg	50	49.2	98	80-120	

MATRIX SPIKE SAMPLE:

128453

Parameter	Units	9219155002 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Aluminum	mg/kg	7.2	321		95	75-125	
Antimony	mg/kg	ND	32.1	34.1	106	75-125	
Arsenic	mg/kg	ND	32.1	31.0	96	75-125	
Barium	mg/kg	ND	32.1	30.9	96	75-125	
Beryllium	mg/kg	ND	32.1	30.7	96	75-125	
Boron	mg/kg	0.84	32.1	33.1	101	75-125	
Cadmium	mg/kg	ND	32.1	31.0	97	75-125	
Calcium	mg/kg	59.2	321	379	100	75-125	
Chromium	mg/kg	0.29	32.1	31.6	98	75-125	
Cobalt	mg/kg	ND	32.1	30.7	96	75-125	
Copper	mg/kg	ND	32.1	31.4	97	75-125	
Iron	mg/kg	38.7	321	341	94	75-125	
Lead	mg/kg	0.52	32.1	31.5	97	75-125	
Magnesium	mg/kg	13.1	321	320	96	75-125	
Manganese	mg/kg	0.61	32.1	31.6	96	75-125	
Molybdenum	mg/kg	ND	32.1	33.1	103	75-125	
Nickel	mg/kg	ND	32.1	31.1	97	75-125	
Potassium	mg/kg	ND	321	297J	92	75-125	
Selenium	mg/kg	ND	32.1	30.8	96	75-125	
Silica	mg/kg	77.8		520			
Silicon	mg/kg	36.4	160	243	129	75-125 F	1 1
Silver	mg/kg	1.4	16	18.0	103	75-125	

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REPORT OF LABORATORY ANALYSIS

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Pace Analytical Services, Inc. 2225 Riverside Dr. Asheville, NC 28804 (828)254-7176 Pace Analytical Services, Inc. 9800 Kincey Ave. Suite 100 Huntersville, NC 28078 (704)875-9092

QUALITY CONTROL DATA

Project: CHROME EAST - BLAST MEDIA

Pace Project No.: 9219155

MATRIX SPIKE SAMPLE:	128453						_
Parameter	Units	9219155002 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Sodium	mg/kg	ND	321	452	97	75-125	
Strontium	mg/kg	ND	32.1	31.4	98	75-125	
Thallium	mg/kg	ND	32.1	29.6	92	75-125	
Tin	mg/kg	ND	32.1	35.4	105	75-125	
Titanium	mg/kg	1.1	32.1	34.8	105	75-125	
Vanadium	mg/kg	ND	32.1	31.1	97	75-125	
Zinc	mg/kg	2.1	32.1	32.2	94	75-125	

SAMPLE DUPLICATE: 128454

Parameter	Units	9221185001 Result	Dup Result	RPD	Qualifiers
Aluminum	mg/kg		ND	2	
Antimony	mg/kg	ND	ND	200	
Arsenic	mg/kg	ND	ND	200	
Barium	mg/kg	ND	.024J	10	
Beryllium	mg/kg	ND	ND	38	
Boron	mg/kg	2.13 ug/g	2.4	14	
Cadmium	mg/kg	ND	ND	56	
Calcium	mg/kg	19.5 ug/g	22.2	13	
Chromium	mg/kg	ND	.077J	27	
Cobalt	mg/kg	4.20 ug/g	4.1	2	
Copper	mg/kg	ND	.11J	73	
Iron	mg/kg	4.47 ug/g	5.0	12	
Lead	mg/kg	0.705 ug/g	0.81	14	
Magnesium	mg/kg	ND	.8J	10	
Manganese	mg/kg	ND	.051J	14	
Molybdenum	mg/kg	ND	.062J	45	
Nickel	mg/kg	ND	ND	.1	
Potassium	mg/kg	ND	1.8J	2	
Selenium	mg/kg	ND	ND	0	
Silica	mg/kg	49.9 ug/g	61.2	20	
Silicon	mg/kg	23.3 ug/g	28.6	20	
Silver	mg/kg	ND	ND	48	
Sodium	mg/kg	ND	22.1J	4	
Strontium	mg/kg	ND	.081J	2	
Thallium	mg/kg	ND	ND	200	
Tin	mg/kg	ND	1.1J	7	
Titanium	mg/kg	ND	.11J	23	
/anadium	mg/kg	ND	ND	200	
Zinc	mg/kg	ND	.34J	33	

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REPORT OF LABORATORY ANALYSIS

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Pace Analytical Services, Inc. 9800 Kincey Ave. Suite 100 Huntersville, NC 28078 (704)875-9092

QUALIFIERS

Project: CHROME EAST - BLAST MEDIA Pace Project No.: 9219155

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to changes in sample preparation, dilution of the sample aliquot, or moisture content.

ND - Not Detected at or above adjusted reporting limit.

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

S - Surrogate

1,2-Diphenylhydrazine (8270 listed analyte) decomposes to Azobenzene.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

Pace Analytical is NELAP accredited. Contact your Pace PM for the current list of accredited analytes.

LABORATORIES

PASI-A Pace Analytical Services - Asheville

PASI-C Pace Analytical Services - Charlotte

ANALYTE QUALIFIERS

- H1 Analysis conducted outside the EPA method holding time.
- R1 RPD value was outside control limits.
- R3 RPD value was outside control limits due to uncertainty of values at or near the PRL.

Date: 06/18/2008 10:10 AM

REPORT OF LABORATORY ANALYSIS

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CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Section A Section	-		Section C		Page: of
	Project Information:		Invoice Information: Attention;		1178467
Address: 221 CET Copy To:	Typon 5	mit			
SCI SCA VI			Company Name:	REGULATORY	AGENCY
Concord NC 20027			Address:	I NPDES I	GROUND WATER J DRINKING WATER
Email To: Purchase	Order No.:		Pace Quote Reference:		RCRA COTHER
Pbege: 4 - 7 B Fax: Project N	ame:		Pace Project Manager:	Site Location	
Requested Due Date/TAT: Project N	lumber:		Pace Profile #: 2295	- / STATE:	
				Requested Analysis Filtered	1 (Y/N)
Section D Matrix Codes Required Client Information MATRIX / CODE	(eu) WP)	COLLECTED	Preservatives	1 NIA	
Drinking Water DW Water WT Waste Water WW Product P SolitSolid Si	(G=GRAB C=COMP)	DSITE COMPOSITE RT ENDIGRA8	COLLECTION COLLECTION	Dref	
SAMPLE ID Oil OL Wipe WP (A-Z, 0-97,-) Air AR Sample IDs MUST BE UNIQUE Tissue TS Other OT	ATRIX CODE		sample TemP AT COLLECTION # OF CONTAINERS Unpreserved H2SO4 HCI NaOH NaOH NaOH Na2S ₂ O3 Methanol Other	Analysis Test Nxfx(((2))	Pace Project No./ Lab I.D.
	- DAIL				Pace Project No./ Lab I.D.
1 blast medig	5 13 2	€ <u>a</u> 8:?>	╼╉╼┼┽┼┽┽┽		
2		┼──┼──┤	╼┨╼┽┽┼┽┼┽┼		┽┽┽╂╬╶╾┈╸
3	┨━┼╺┼┈╾╸	╉╌╼╾┨╼╼╾╾┨	╼╉╼╀┼┼┽┼┽┼┼	┋╔╾╏╌╏╼╎╶┥╴╏╸	╉┽┼╂╉┈╾╌╾╶┥
	┨─┤─┼───	┼╾╼┼╼╾┼╍╾╴┼	╶╂╾┼┽┼┼┽┼┼	┨┊╏╾╂╾╂╶╂╼╂╶╂╼╂╶╂╼	╉╉╋
5	╂━┼╺┼───	╞──┼──┼	╼╂╼╂┾╉┿╋	╏┈╏╾┨╼┨╼┨╼┨╼┨╼┨╼	┽┼┽╉╌╂╼╴╼╴╼╴╼╴╼
7	┨╼┼╶┼───┊	┼╾╼┼╼╌┼┈╼┤	╾╊╾┼┼┽┼┽┼┽┼╸		
8		┼╍╍┼╍╍┼╸╼┼	╼╂╾┼┽┽┽┼┼┼	╏┊┊╞╾┼╾╁╾┼╾┼╼┼╶┼╴┼	┽╾┽╶┼╾┨╺┨╸╴╼╸╴╸╴╸╸╸╸
9	╉╌┼╾┼╼╌╼	┼╼╼┼╼╼┼	╼╂╾┞┽┼┽┼┽┼┽	<mark>╽┊╽╾┧┈┧╾┧╺╁╶┟╼┼╶┼╸</mark> ┼╸	╉╍╪╾╞╼╂╶╂╾╴╼╴╴╼╴╴╴╴╴
10	╬╌┼╾┼╼╾┷	┟──┼──┽	╶╼╂╼╾┧╼┼╾┼╾┽╶┼╌╁╍┧╼╆┈		╉╂╤┨╼╢╼╴╼╴╼╴╴╴
11	╂╌┼╌┾───	┼╌╼┼╼╌┼╴╌┤	╾╂╾┼╾┼┼┼╾┼╌┼╾		
12	╂╾┼╾┼╼╼╸	┼╸──┼───┼	╶╊╌┽┾┽┾┽┾╸	┫╴┟╾┼╾┼╶┼╾┼╴┼╾┽╼┼╌┽╾	
ADDITIONAL COMMENTS	RELINQUISHED BY	/ AFFILIATION DATE	TIME	D BY / AFFILIATION DATE	TIME SAMPLE CONDITIONS
	Ll. L	12 5/17/0	r 9:3-1 1/MTh	101- \$131-BE	2:JO NATO- NO 441
					2^{-1} $N = 12$ 4^{-1}
	· · · · · · · · · · · · · · · · · · ·				
		SAMPLER NAME AND SIGNAT	TURE		
OR	RIGINAL	PRINT Name of SAMPI	LER:		Temp in *C Temp in *C Custody Coustody Seated Cooler (Y/N) Samples Intacl
		SIGNATURE of SAMPI	LER:	DATE Signed (MM/DD/YY):	Temp in *C Received on Ice (Y/N) Sealed Cooler (Y/N) Samples Intact (Y/N)

*Important Note: By signing this form you are accepting Pace's NET 30 day payment terms and agreeing to late charges of 1.5% per month for any invoices not paid within 30 days.

F-ALL-Q-020rev.07, 15-May-2007

	mple. Sondition Upon Receipt
Face Analytical Client Nar	me: Chrone East Project # 9219155
Custody Seal on Cooler/Box Present: Uyes	Proj Name - N/A
	e Bags None Other
Thermometer Used T060	Type of Ice: Wet Blue None Samples on ice, cooling process has begun Biological Tissue is Erozoff you have Date and Initials of person examining
Cooler Temperature	Biological Tissue is Frozen: Yes No N/A Comments:
Chain of Custody Present:	Thres DNO DN/A 1.
Chain of Custody Filled Out:	□Y288-□N0 □N/A 2.
Chain of Custody Relinquished:	Difes DNO DN/A 3.
Sampler Name & Signature on COC:	DYes DNG DN/A 4.
Samples Arrived within Hold Time:	Thres DNO DN/A 5.
Short Hold Time Analysis (<72hr):	DYes DNO DN/A 6.
Rush Turn Around Time Requested:	DYes DHO DN/A 7.
Sufficient Volume:	TYes DNO DN/A 8.
Correct Containers Used:	DYes ANO DN/A 9. Zinla
Pace Containers Used:	
Containers Intact:	Dies DNO DN/A 10.
Filtered volume received for Dissolved lests	DYes DNO DNIA 11.
Sample Labels match COC:	DYes DNO DN/A 12. AD id on riploc
-Includes date/time/ID/Analysis Matrix:	DT NO IN II
All containers needing preservation have been checked.	UYes DNO DATA 13.
All containers needing preservation are found to be in compliance with EPA recommendation.	DYes DNO DHIA
exceptions: VOA, coliform, TOC, O&G, WI-DRO (water)	Yes ONO Initial when completed
Samples checked for dechlorination:	YesNO14
Headspace in VOA Vials (>6mm):	DYes DN0 DNA 15.
Trip Blank Present:	DYes DNO DIVIA 16.
Trip Blank Custody Seals Present	DYes DNO DNA
Pace Trip Blank Lot # (if purchased): N/A	·
Client Notification/ Resolution: Person Contacted:	Field Data Required? Y / N / N/A Date/Time:
Comments/ Resolution:	
Project Manager Review:	Date: 5/13/08

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Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office (i.e. out of hold, incorrect preservative, out of temp. incorrect containers)

ace Analvtica.

Pace Analytical Services, Inc. 9800 Kincey Ave. Suite 100 Huntersville, NC 28078 (704)875-9092

May 29, 2008

PESUTS

Mr. Jason Smith Chrome East 321 Sign Drive Concord, NC 28027

RE: Project: CHROME EAST (BLAST MEDIA Pace Project No.: 9219155

Dear Mr. Smith:

Enclosed are the analytical results for sample(s) received by the laboratory on May 13, 2008. The results relate only to the samples included in this report. Results reported herein conform to the most current NELAC standards, where applicable, unless otherwise narrated in the body of the report.

Inorganic Wet Chemistry and Metals analyses were performed at our Pace Asheville laboratory and Organic testing was performed at our Pace Huntersville laboratory unless otherwise footnoted. All Microbiological analyses were performed at the laboratory where the samples were received.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Brende Pathammarky

Brenda Pathammavong

brenda.pathammavong@pacelabs.com Project Manager

Enclosures

REPORT OF LABORATORY ANALYSIS

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Pace Analytical Services, Inc. 9800 Kincey Ave. Suite 100 Huntersville, NC 28078 (704)875-9092

CERTIFICATIONS

Project: CHROME EAST - BLAST MEDIA Pace Project No.: 9219155

Charlotte Certification IDs

Florida/NELAP Certification Number: E87627 Kansas Certification Number: E-10364 Louisiana/LELAP Certification Number: 04034 North Carolina Drinking Water Certification Number: 37706 North Carolina Wastewater Certification Number: 12

Asheville Certification IDs

Florida/NELAP Certification Number: E87648 Louisiana/LELAP Certification Number: 03095 New Jersey Certification Number: NC011 North Carolina Drinking Water Certification Number: 37712 North Carolina Wastewater Certification Number: 40 North Carolina Bioassay Certification Number: 9 North Carolina Field Services Certification Number: 5342 South Carolina Certification Number: 990060001 South Carolina Bioassay Certification Number: 990060003 Tennessee Certification Number: 04010 Virginia Certification Number: 00213

Pennsylvania Certification Number: 68-03578 South Carolina Certification Number: 99030001 South Carolina Bioassay Certification Number: 99030002 Tennessee Certification Number: 2980 Virginia Certification Number: 00072

Eden Certification IDs

North Carolina Drinking Water Certification Number: 37738 Virginia Drinking Water Certification Number: 00424 North Carolina Wastewater Certification Number: 633

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SAMPLE ANALYTE COUNT

Project: Pace Project No	CHROME EAST - BLAST MEDIA 0.: 9219155				
Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
9219155001	BLAST MEDIA	EPA 6010	SHB	29	PASI-A
		EPA 7470	EWS	1	PASI-A

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Pace Analytical Services, Inc. 9800 Kincey Ave. Suite 100 Huntersville, NC 28078 (704)875-9092

ANALYTICAL RESULTS

Project: CHROME EAST - BLAST MEDIA

Pace Project No.: 9219155

Sample: BLAST MEDIA	Lab ID: 9219155001	Collected: 05/13/08	08:30	Received: 05	/13/08 09:30	Matrix: Solid	
Results reported on a "wet-w	eight" basis						
Parameters	Results Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, TCLP	Analytical Method: EPA	6010 Preparation Method	d: EPA	3010			
Aluminum	ND mg/L	0.50	1	05/20/08 09:20	05/21/08 01:09	7429-90-5	
Antimony	ND mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-36-0	
Arsenic	ND mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-38-2	
Barium	0.029 mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-39-3	
Beryllium	ND mg/L	0.0050	1	05/20/08 09:20	05/21/08 01:09	7440-41-7	
Boron	0.74 mg/L	0.050	1	05/20/08 09:20	05/21/08 01:09	7440-42-8	
Cadmium	ND mg/L	0.0050	1	05/20/08 09:20	05/21/08 01:09	7440-43-9	
Calcium	2.4 mg/L	0.50	1	05/20/08 09:20	05/21/08 01:09	7440-70-2	
Chromium	ND mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-47-3	
Cobalt	ND mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-48-4	
Copper	ND mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-50-8	
Iron	0.30 mg/L	0.25	1	05/20/08 09:20	05/21/08 01:09	7439-89-6	
Lead	ND mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7439-92-1	
Magnesium	ND mg/L	0.50	1	05/20/08 09:20	05/21/08 01:09	7439-95-4	
Manganese	0.031 mg/L	0.025		05/20/08 09:20			
Molybdenum	ND mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7439-98-7	
Nickel	ND mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-02-0	
Potassium	ND mg/L	25.0	1	05/20/08 09:20	05/21/08 01:09	7440-09-7	
Selenium	ND mg/L	0.050	1	05/20/08 09:20	05/21/08 01:09	7782-49-2	
Silica	1.9 mg/L	1.0		05/20/08 09:20			
Silicon	0.87 mg/L	0.50	1	05/20/08 09:20	05/21/08 01:09	7440-21-3	
Silver	ND mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-22-4	
Sodium	563 mg/L	25.0		05/20/08 09:20			
Strontium	ND mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-24-6	
Thallium	ND mg/L	0.050		05/20/08 09:20			
Tin	ND mg/L	0.025		05/20/08 09:20			
Titanium	ND mg/L	0.025		05/20/08 09:20			
Vanadium	ND mg/L			05/20/08 09:20			
Zinc	0.078 mg/L			05/20/08 09:20			
7470 Mercury, TCLP	Analytical Method: EPA 7	470 Preparation Method	: EPA	7470			
Mercury	ND ug/L	0.20	1 (05/20/08 10:35	05/20/08 14:21	7439-97-6	

Date: 05/29/2008 12:54 PM

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Pace Analytical Services, Inc. 2225 Riverside Dr. Asheville, NC 28804 (828)254-7176

QUALITY CONTROL DATA

Project: Pace Project No.:	CHROME EAST 9219155	- BLAST MEDIA						
QC Batch: QC Batch Method: Associated Lab Sam	MERP/1482 EPA 7470 pples: 9219155	5001	Analysis Me Analysis De		EPA 7470 7470 Mercury To	CLP		·
METHOD BLANK:	116517		<u> </u>	<u></u>			<u></u>	
Associated Lab Sam	nples: 9219155	001						
Param	neter	Units	Blank Result	Reporting Limit	Qualifiers			
Mercury		ug/L	ND	0.2	0	-		
LABORATORY CON	ITROL SAMPLE:	116518						
Param	ieter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers	
Mercury		ug/L	2.5	2.8	111	80-120		
MATRIX SPIKE SAM		116519						
Param	eter	Units	9219196002 Result	2 Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Mercury		ug/L		ND 2.5	2.6	103	75-125	
SAMPLE DUPLICAT	E: 116520							
Param	eter	Units	9219448007 Result	- Dup Result	RPD	Qualifiers		
Mercury	<u>-</u>	ug/L	ND	.091	J9	4 R3		

Date: 05/29/2008 12:54 PM

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Pace Analytical Services, Inc. 9800 Kincey Ave. Suite 100 Huntersville, NC 28078 (704)875-9092

QUALITY CONTROL DATA

Pace Project No.:	9219155			
QC Batch:	MPRP/2371	Analysis Method:	EPA 6010	-
QC Batch Method:	EPA 3010	Analysis Description:	6010 MET TCLP	
Associated Lab San	nples: 9219155001			

METHOD BLANK: 116670

Associated Lab Samples: 9219155001

Parameter	Units	Blank Result	Reporting Limit	Qualifiers
Arsenic	mg/L	ND	0.025	
Barium	mg/L	ND	0.025	
Cadmium	mg/L	ND	0.0050	
Chromium	mg/L	ND	0.025	
Lead	mg/L	ND	0.025	
Selenium	mg/L	ND	0.050	
Silver	mg/L	ND	0.025	

116672

LABORATORY CONTROL SAMPLE: 116671

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Arsenic	mg/L	2.5	2.6	105	80-120	
Barium	mg/L	2.5	2.3	94	80-120	
Cadmium	mg/L	2.5	2.4	96	80-120	
Chromium	mg/L	2.5	2.4	98	80-120	
Lead	mg/L	2.5	2.3	93	80-120	
Selenium	mg/L	2.5	2.7	107	80-120	
Silver	mg/L	1.2	1.2	97	80-120	

MATRIX SPIKE SAMPLE:

Parameter	Units	9219146001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Arsenic	mg/L	ND	2.5	2.6	105	75-125	····
Barium	mg/L	0.29	2.5	2.6	92	75-125	
Cadmium	mg/L	ND	2.5	2.4	96	75-125	
Chromium	mg/L	ND	2.5	2.5	98	75-125	
Lead	mg/L	ND	2.5	2.3	93	75-125	
Selenium	mg/L	ND	2.5	2.7	107	75-125	
Silver	mg/L	ND	1.2	1.2	97	75-125	

SAMPLE DUPLICATE: 116673

Parameter	Units	9219146002 Result	Dup Result	RPD	Qualifiers
Arsenic	mg/L	ND	ND -		· · · · · · · · · · · · · · · · · · ·
Barium	mg/L	0.42	0.42	0	
Cadmium	mg/L	ND	.0032J	12	
Chromium	mg/L	ND	.0023J	38	
Lead	mg/L	ND	ND	0	

Date: 05/29/2008 12:54 PM

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QUALITY CONTROL DATA

Project: CHROME EAST - BLAST MEDIA Pace Project No.: 9219155

SAMPLE DUPLICATE: 1160	573				
		9219146002	Dup		
Parameter	Units	Result	Result	RPD	Qualifiers
Selenium		ND	ND	200	
Silver	mg/L	ND	ND	16	

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QUALIFIERS

Project: CHROME EAST - BLAST MEDIA Pace Project No.: 9219155

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to changes in sample preparation, dilution of the sample aliquot, or moisture content.

ND - Not Detected at or above adjusted reporting limit.

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

S - Surrogate

1,2-Diphenylhydrazine (8270 listed analyte) decomposes to Azobenzene.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

Pace Analytical is NELAP accredited. Contact your Pace PM for the current list of accredited analytes.

LABORATORIES

PASI-A Pace Analytical Services - Asheville

ANALYTE QUALIFIERS

R3 RPD value was outside control limits due to uncertainty of values at or near the PRL.

Date: 05/29/2008 12:54 PM

REPORT OF LABORATORY ANALYSIS

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CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Section A	Section B	1						s	iectio	n C												P	age:			of	
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Phone: 4 - 7 BT Fax:	Project Nan	ne:						P	ace Pri lanage	oject								SI	te Lo	cation							
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	ORI	GIN	JAI	ŀ		_	me of SAMP							4 <i>6 1</i>		1.1.1.1.1	100							Temp in °C	Received on Ice (Y/N)	Custody Sealed Cooler (Y/N)	Samples Intact (Y/N)
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				1		SIGNATU	RE of SAMP	PLER:									M/DD/Y							- I	œ	Š	Sa

*Important Note: By signing this form you are accepting Pace's NET 30 day payment terms and agreeing to late charges of 1.5% per month for any invoices not paid within 30 days.

F-ALL-Q-020rev.07, 15-May-2007

	ALL DE ATTENDE ALL DE LE LE LE	n Upon Receipt	
Face Analytical Client Nan	ne: Chrone	- Ealt Proje	ct # <u>9219155</u>
Courier: Courier: Fed Ex CUPS USPS		Pace Other	Optional
Custody Seal on Cooler/Box Present: yes			Proj. Due Date: «N/A Proj. Name: N/A
Packing Material: 🔲 Bubble Wrap 🛛 🗌 Bubble	Bags None	Other	
Thermometer Used T060	Type of Ice: We		les on ice, cooling process has begun
Cooler Temperature	Biological Tissue		ate and Initials of person examining contents: $(\zeta - \zeta + $
Chain of Custody Present:	TTES DNO DNIA	1.	
Chain of Custody Filled Out:		2.	
Chain of Custody Relinquished:	DYES DNO DN/A	3.	
Sampler Name & Signature on COC:		4.	
Samples Arrived within Hold Time:	Dires ONO ON/A	5.	
Short Hold Time Analysis (<72hr):	DYes DNO DN/A	6.	
Rush Turn Around Time Requested:	UYes THO DNIA	7	·
Sufficient Volume:	EYes DNO DN/A	+	
Correct Containers Used:	DYes DNO DN/A	9. 2in (> ~	
-Pace Containers Used:	DYes DHO DN/A		
Containers Intact:	Dies DNO DN/A	10	
Filtered volume received for Dissolved tests	DYES DNO DNA		
Sample Labels match COC:	DYES INO DNA	12. no id on	riplac
-Includes date/time/ID/Analysis Matrix:		10 10	<i>u</i>
All containers needing preservation have been checked.	DYES DNO DNA	13.	
All containers needing preservation are found to be in compliance with EPA recommendation.	OYes ONO OHTA		
exceptions: VOA, coliform, TOC, O&G, WI-DRO (water)	□Yes □No	Initial when completed	
Samples checked for dechlorination:	DYES DNO DINIA	14	
Headspace in VOA Vials (>6mm):	DYes DNO DNIA	15	
Trip Blank Present:	DYes DNO . DNA	16.	
Trip Blank Custody Seals Present	DYES DNO DNIA		
Pace Trip Blank Lot # (if purchased): N/A			
Client Notification/ Resolution: Person Contacted: Comments/ Resolution:	Date/		Data Required? Y / N / N/A
Project Manager Review:	P	1	Date: 5/13/08

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Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office (i.e. out of hold, incorrect preservative, out of temp. incorrect containers)

Subject: Re: Sample condition form From: "Brenda Pathammavong" <Brenda.Pathammavong@pacelabs.com> Date: Wed, 25 Jun 2008 08:54:38 -0500 To: "Sean.Morris@ncmail.net" <sean.morris@ncmail.net>

Hi Sean,

I did not collect or help with collection of the sample; I just picked it up since I live in that direction. I met Jason Smith outside in front of the building and he handed me the sample already in a ziploc. Since I was in front of the building I did not see where the sample came from or the actual sandblast pile. Since sandblast material can be different in consistency (coloring, how coarse, size, etc), you could say it fell into the consistency catagory. However, my first impression when I saw the sample was that of sand you would put in a child's sandbox.

Hope this was helpful - Brenda

Brenda Pathammavong Project Manager Pace Analytical Services 9800 Kincey Ave., Ste 100 Huntersville, NC 28078 704-875-9092 ext. 241 704-875-9091 (fax) brenda.pathammavong@pacelabs.com

>>> "Sean.Morris@ncmail.net" <sean.morris@ncmail.net> 6/25/2008 9:24 AM >>> Brenda,

I noticed that you picked up the second sample. Did you collect or help with the collection of the sample? Did you see the facility sample from the pile of sandblast material or did they just hand you a ziplock bag. Also, did you happen to notice if the samples looked consistent with sandblast material. Any information you can provide would be greatly appreciated. Thanks, Sean

This email has been scanned by the MessageLabs Email Security System. For more information please visit <u>http://www.messagelabs.com/email</u>

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Subject: Re: [FWD: Blast Media 9219155] CHROME EAST From: Sean Morris <Sean.Morris@ncmail.net> Date: Tue, 27 May 2008 10:22:57 -0400 To: jason.smith@chromeeast.com

Jason,

I left a message last week but wanted to follow-up with an email. You need to take another sample to Pace and have them analyze it for metals (totals). You can try calling them because they may have enough of the first sample left over to run the analysis without you having them bring a new one. The levels on Barium were low but we need to make sure that the totals level is below clean-up regulations. Let me know when you receive the sample results. Thanks, Sean

jason.smith@chromeeast.com wrote:

Jason Smith Chrome East LLC. 321 Sign Dr. Concord NC 28027 Office: 704-784-8900 Fax: 704-784-8918 jason.smith@chromeeast.com <mailto:jason.smith@chromeeast.com>

www.chromeeast.com <http://www.chromeeast.com>

----- Original Message ------Subject: Blast Media 9219155 From: "Kevin Herring" <Kevin.Herring@pacelabs.com> Date: Thu, May 22, 2008 5:57 am To: <jason.smith@chromeeast.com> Cc: "Brenda Pathammavong" <Brenda.Pathammavong@pacelabs.com> Kevin Herring Project Manager Pace Analytical 9800 Kincey Ave. Suite 100 Huntersville, NC 28078 704-875-9092 ext. 236 704-875-9091 fax kevin.herring@pacelabs.com <mailto:kevin.herring@pacelabs.com> Have you tried PacePort yet? Custom formatted data spreadsheets are now at your fingertips! Data as soon as it is final, 24/7. Let me know if you want to register for this handy Data Management System. In an effort to help the environment, Pace Analytical is doing its part by going to a paperless reporting system. This process will help decrease paper waste and will allow Pace to continue to offer competitive pricing. The email and documents accompanying this transmission contain confidential information belonging to the sender who is legally privileged. The information is intended only for the use of the individual(s) or entity(ies) named herein. If you are not the intended recipient, you are hereby notified that any disclosure, copying distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. If you

have received this in error, please immediately notify us by telephone (1.888.990.PACE) to arrange for return of the original

documents.

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YES / NO	CSE ONLY					
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Involved		Media	Residences	People	On-site	Off-site
		(a, gw, sw, s)		involved	wells	wells
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NC DEPT OF ENVIRONMENT & NATURAL RESOURCES DIVISION OF WASTE MANAGEMENT HAZARDOUS WASTE SECTION

RCRA RE-INSPECTION REPORT

1.	Facility Information:	Chrome East, Inc 321 Sign Drive Concord, NC 28027
2.	Facility Contact:	Mr. Chuck Baumohl, Owner
3.	Survey Participants:	Mr. Chuck Baumohl Mr. Jason Smith, Manager Mr. Sean Morris, Environmental Senior Specialist
4 .	Date of Re-Inspection:	June 20, 2007
	Date of Report:	June 20, 2007
5.	<u>Purpose of Inspection</u> :	To determine compliance with Immediate Action NOV, Docket # 2007-094

6. Facility Description:

On June 20, 2007 I conducted a follow-up inspection at Chrome East located in Concord, NC. I met with Mr. Jason Smith and Mr. Chuck Baumohl at the time of the inspection. The purpose of the inspection was to confirm compliance with Immediate Action Notice of Violation (IANOV), Docket # 2007-094.

Chrome East has moved operations since the initial inspection conducted on April 4, 2007. The facility has moved out of the building located at 744 D Central Drive, Concord NC and into a building located at 321 Sign Drive, Concord NC. A walkthrough of both facilities was conducted. The building at 744 D Central Drive has been cleaned and there were no containers of hazardous waste in the building. All containers of plating waste, noted on the IANOV, have been properly disposed. The facility disposed of 275-gallons of plating waste (D002/D007). Manifests were available and the waste was sent to Detrex Corp – NCD 049 773 245. Chrome East was issued an EPA Provisional ID # of NCP 042 507 018, for the shipment. The facility has complied with the requirements cited in the IANOV.

During the follow up inspection a walkthrough was also conducted at the facility's new location. The facility has not yet started plating operations and are still in the process of setting up equipment. I provided technical assistance with small quantity generator regulations and provided a compliance checklist.

7. Site Deficiencies:

- 15A NCAC 13A .0109(a) Chrome East, Inc is in violation of this regulation in that the facility was not able to demonstrate the amount of time that hazardous waste plating waste has been stored on site. The facility is operating as a storage facility without a permit. The facility is no longer storing hazardous waste. Violation has been corrected.
- 40 CFR 262.11 Chrome East, Inc is in violation of this regulation in that there were (6) 55-gallon containers and (1) 30-gallon container of waste plating waste being stored on site and a proper waste determination had not been made. The facility has made the proper waste determinations. Violation has been corrected.

9. <u>Reminders:</u>

• Once the facility returns to operation a generator status determination must be made. If the facility generates more than 220-pounds of hazardous waste during any calendar month the facility must notify as a small quantity generator and comply with all applicable requirements.

a Mh 6/21/07 **INSPECTOR** (DATE

(SENT BY US MAIL) FACILITY CONTACT

cc: MRO Files Brent Burch, Western Area Compliance Supervisor Central Office Files Chuck Baumohl, Chrome East, Inc

North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor William G. Ross Jr., Secretary

April 10, 2007

CERTIFIED MAIL RETURN RECEIPT REQUESTED

IMMEDIATE ACTION NOTICE OF VIOLATION Docket # 2007-094

Mr. Chuck Baumohl, Owner Chrome East, Inc. 788 D Central Drive Concord, NC 28027

Dear Mr. Baumohl:

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (Section) was authorized to operate the State Resource Conservation and Recovery Act (RCRA) Hazardous Waste Program under the Solid Waste Management Act (Act), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules), in lieu of the federal RCRA program.

On April 2, 2007 Mr. Jim Sells, with City of Concord Emergency Management, issued a site inspection referral for Chrome East, Inc. Mr. Sells reported that the fire department had responded to a fire at the facility and that he noticed various containers of chemicals around the facility. The fire started at an electric controller box on one of the nickel-plating baths. The damage to the facility was minimal and all plating solutions were contained in secondary containment areas around the plating baths. Mr. Sean Morris, Senior Environmental Specialist, and Mr. Mark Burnette, Senior Environmental Specialist, conducted an investigation at Chrome East, Inc. on April 4, 2007. Mr. Chuck Baumohl and Mr. Jason Smith, Facility Manager, were present during the investigation.

Statement of Facts Related to Respondent's Management of Hazardous Waste

During the investigation there were (6) 55-gallon containers and (1) 30-gallon container of material identified as plating waste, being stored on site. The waste materials consist of waste plating sludge, waste acid solutions, and waste solvents. The waste materials have been accumulating since the facility began operations 18 months ago.

Statutory and Regulatory Background

- A. 40 CFR 261.1(a), adopted by reference at 15A NCAC 13A .0106(a), identifies those solid wastes which are subject to regulation as hazardous wastes under Parts 262 through 265 and Parts 270, 271, and 124 of this Chapter and which are subject to the notification requirements of Section 3010 of RCRA.
- B. 40 CFR 261.2(b), adopted by reference at 15A NCAC 13A .0106(a), states that materials are solid waste if they are abandoned by being [1] disposed of; or [2] burned or incinerated; or [3] accumulated, stored, or treated (but not recycled) before or in lieu of being abandoned by being disposed of, burned, or incinerated.
- C. 40 CFR 261.3(a), adopted by reference at 15A NCAC 13A .0106(a), states that a solid waste, as defined in Section 261.2 is a hazardous waste if:
 - 1. It is not excluded from regulation as a hazardous waste under Section 261.4(b); and
 - 2. It meets any of the following criteria:
 - i. It exhibits the characteristics of hazardous waste identified in Subpart C.
 - ii. It is listed in Subpart D and has not been excluded from the lists in Subpart D under Sections 260.20, and 260.22 of this chapter.
 - iii. It is a mixture of solid waste and hazardous waste that is listed in Subpart D solely because it exhibits one or more of the characteristics of hazardous waste identified in Subpart C, unless the resultant mixture no longer exhibits any characteristic of hazardous waste identified in Subpart C.
 - iv. It is a mixture of solid waste and one or more hazardous wastes listed in Subpart D and has not been excluded from this paragraph under Sections 260.20 and 260.22 of this chapter.
- D. NCGS 130A-290(6), defines "Disposal" as the discharge, deposit, injection, dumping, spilling, leaking or placing of any solid waste into or on any land or water so that the solid waste or any constituent part of the solid waste may enter the environment or be emitted into the air or discharged into any waters, including groundwater.
- E. 40 CFR 124.2, adopted by reference at 15A NCAC 13A .0105(a) defines "Owner" or "Operator" as the owner or operator of any "facility or activity" subject to regulation under the RCRA program.
- F. NCGS 130A-290(22), defines "Person" as an individual, corporation, company, association, partnership, unit of local government, State agency, federal agency or other legal entity.

G. NCGS 130A-290(41), defines "Storage" as the containment of solid waste, either on a temporary basis or for a period of years, in a manner which does not constitute disposal.

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H. 40 CFR 260.10, adopted by reference in 15A NCAC .0102(b), defines a "generator" as "any person, by site, whose act or process produces hazardous waste identified or listed in part 261 or whose act first causes a hazardous waste to become subject to regulation." The EPA has long recognized that, in the event of a violation of RCRA and the hazardous waste rules, "co-generators" of hazardous waste can be jointly and severally liable for improper management of hazardous waste. 45 FR 72024, 72026 (October 30, 1980).

Violations Requiring Immediate Action

- I. It is the determination of the Section that the containers of waste plating materials located at Chrome East, Inc., located at 788 D Central Drive, Concord, NC constitute storage of solid/hazardous waste subject to all applicable requirements of 40 CFR Part 261 through Part 265 and Part 270, incorporated by reference in 15A NCAC 13A .0106 -- .0110 and .0113. Specifically, for the containers of waste plating materials on said property:
 - 1. 40 CFR 262.11, adopted by reference at 15A NCAC 13A .0107(a), requires that a person who generates a solid waste, as defined in 40 CFR 261.2, must determine if the waste is a hazardous waste using the following method:
 - a. He should first determine if the waste is excluded from regulation under 40 CFR 261.4.
 - b. He must then determine if the waste is listed as a hazardous waste in Subpart D of 40 CFR Part 261.
 - c. If the waste is not listed as a hazardous waste in Subpart D of 40 CFR Part 261, he must determine whether the waste is identified in Subpart C of 40 CFR Part 261 by either:
 - i. Testing the waste according to the methods set forth in Subpart C of 40 CFR Part 261, or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or
 - ii. Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

Chrome East, Inc. is in violation of 40 CFR 262.11, adopted by reference at 15A NCAC 13A .0107(a), in that a solid waste was generated on the property as defined in 40 CFR 261.2 and a determination was not made by the generator whether that waste was a hazardous waste.

2. 15A NCAC 13A .0109(a), requires that any person who treats, stores, or disposes of hazardous waste shall comply with the requirements set forth in this section. The treatment, storage or disposal of hazardous waste is prohibited except as provided in 40 CFR Parts 264 and 265, adopted by reference in 15A NCAC 13A .0109 -- .0110.

Chrome East, Inc. is in violation of 15A NCAC 13A .0109(a), in that hazardous waste has been stored without complying with the requirements set forth in 40 CFR Parts 264 and 265, adopted by reference in 15A NCAC 13A .0109 and .0110.

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COMPLIANCE SCHEDULE

Within 30 days from receipt of this notice, Chrome East, Inc. shall comply with the following requirements:

- 1. Comply with 40 CFR 262.11, adopted by reference at 15A NCAC 13A .0107(a). An immediate determination of hazardous characteristics must be completed for all containers being used to store waste plating materials.
- 2. Comply with 40 CFR 262.12, adopted by reference at 15A NCAC 13A .0107(a). Prior to shipment of any hazardous waste, an EPA Identification Number must be obtained for this site. You may contact Mr. Jim Edwards with this office at (919) 508-8539 to make provisions for obtaining the I.D. number.
- 3. Comply with 15A NCAC 13A .0109(a). Chrome East, Inc. shall no longer store hazardous waste without full compliance with this section. Pending shipment of hazardous waste for proper disposal, Chrome East, Inc. must comply with 40 CFR 262.34(a), adopted by reference at 15A NCAC 13A .0107(c), which states that:
 - a. If the waste is placed in containers the generator must comply with Subpart I of 40 CFR Part 265 or if the waste is placed in tanks, the generator must comply with Subpart J of 40 CFR Part 265, except 265.197(c) and 265.200. No waste piles are allowed.
 - b. The date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container.
 - c. While being accumulated on-site, each container and tank must be labeled or marked clearly with the words, "Hazardous Waste"; and
 - d. The generator must comply with the requirements for owners or operators in Subparts C and D in 40 CFR Part 265, Section 265.16 and 268.7(a)(4).

Potential Consequences of Failure to Comply

You must comply with each requirement of this Immediate Action Notice of Violation (IANOV); however, compliance will not divest the Section of its authority to issue an

administrative penalty for the violations cited in this IANOV and additional violations cited in a subsequent Compliance Order with Administrative Penalty. In accordance with NCGS 130A-22(a), the penalty shall not exceed twenty-five thousand dollars (\$25,000.00) per day in the case of a first violation. Each day of a continuing violation shall constitute a separate violation.

Pursuant to NCGS 130A-18, a violation of any provision of the Act or the Rules may also result in the Section initiating an action for injunctive relief. If an injunction is obtained, you will be subject to both the civil and criminal contempt powers of the North Carolina General Courts of Justice.

If you should have questions concerning the issuance of this IANOV, you may contact Mr. Sean Morris at 704-663-1699 ext. 2155.

Sincerely,

Elaberth W. Caunar

Elízabeth W. Cannon, Chief Hazardous Waste Section

cc: Central Files Doug Holyfield Sean Morris David Troutman, Cabarrus County Health Dept.

NC DEPT OF ENVIRONMENT & NATURAL RESOURCES DIVISION OF WASTE MANAGEMENT HAZARDOUS WASTE SECTION

RCRA INSPECTION REPORT

1.	Facility Information:	Chrome East, Inc 788 D Central Drive Concord, NC 28027
2.	Facility Contact:	Mr. Chuck Baumohl, Owner
3.	<u>Survey Participants</u> :	Mr. Chuck Baumohl Mr. Jason Smith, Manager Mr. Mark Burnette, Senior Environmental Specialist Mr. Sean Morris, Senior Environmental Specialist
4.	Date of Inspection:	April 4, 2007
	Date of Report:	April 5, 2007

5. <u>Purpose of Inspection</u>: To determine compliance with 40 CFR 260-279.

6. Facility Description:

On April 2, 2007 Jim Sells with City of Concord Emergency Management contacted me. Mr. Sells reported that the fire department had responded to a fire at the facility and that he noticed various containers of chemicals around the facility. The fire started at an electric controller box on one of the nickel-plating baths. The damage to the facility was minimal and all plating solutions were contained in secondary containment areas around the plating baths. The facility is currently not in an area zoned for plating operations.

Chrome East, Inc is located in Concord, NC. The facility has around 6-employees. The facility has been in operation at this location for the last 18-months. Facility operations include decorative chrome plating of small motorcycle parts. The facility generates hazardous waste from wastewater plating sludge, waste acids, waste metal solutions, and waste solvents. The facility does use cyanide solutions when plating with a copper base. The cyanide-plating bath is equipped with its own secondary containment area so that a release would not come in contact with other plating solutions.

There were (6) 55-gallon containers and (1) 30-gallon container of plating waste in storage at the facility. The containers were not properly labeled or dated at the time of the inspection. A notification form was left with the facility at the time of the inspection. The facility has not shipped any hazardous waste off-site since beginning

operations 18 months ago. A follow-up generator inspection will be conducted once the facility is back to operation. A small quantity generator compliance checklist was left at the facility at the time of the inspection. Example documents for emergency arrangements and weekly inspections were also left at the facility.

7. <u>Waste Type</u>:

Waste plating sludge Waste acids Waste solvents

8. Site Deficiencies:

- 15A NCAC 13A .0109(a) Chrome East, Inc is in violation of this regulation in that the facility was not able to demonstrate the amount of time that hazardous waste plating waste has been stored on site. The facility is operating as a storage facility without a permit.
- 40 CFR 262.11 Chrome East, Inc is in violation of this regulation in that there were (6) 55-gallon containers and (1) 30-gallon container of waste plating waste being stored on site and a proper waste determination had not been made.
 - * Above violations were addressed on an Immediate Action Notice of Violation.

9. <u>Reminders:</u>

• Once the facility returns to operation a generator status determination must be made. If the facility generates more than 220-pounds of hazardous waste during any calendar month the facility must notify as a small quantity generator and comply with all applicable requirements.

INSPECTOR (DATE)

(SENT BY CERTIFIED MAIL) FACILITY CONTACT

cc: MRO Files Jesse Wells, Western Area Compliance Supervisor Central Office Files Chuck Baumohl, Chrome East, Inc

Inspection Notes

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North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor William G. Ross Jr., Secretary

April 27, 2007

Charles Baumohl Chrome East LLC 788 D Central Drive Conover, NC 28027

Re: Provisional EPA ID Number NCP042507018

Dear Mr. Baumohl:

The above Provisional ID Number has been assigned to your facility as handler of hazardous waste. This number is to be used for the hazardous waste activity as described on the application. Specifically, the Provisional ID Number, issued to your facility is for the shipment of hazardous waste from the site identified on the application. This number is effective for a period of ninety (90) days only.

Effective January 1, 1986, all handlers of hazardous waste were required by N.C.G.S. 130A-294.1 to pay an annual fee G.S. 130-294.1 (e) requires that a person who generates greater than 1,000 kilograms (2,200 lbs) of Hazardous Waste in any calendar month during the year shall pay an annual fee of one thousand dollars (\$1,000.00).

In addition, N.C.G.S. 2-3512 states that a processing fee of \$25.00 will be charged for returned checks.

If you have any questions concerning this fee, please call Jim Edwards at (919)508-8539.

Sincerely,

Helen Cotton Programs Branch Head Hazardous Waste Section

Cc: Central Files (General) Sean Morris



INVOICE

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a a fine shele States.

Invoice Number	Invoice Date	Your EPA ID #	Amount Due	Due Date	Show Amount Paid Here
HW9720	04/27/2007	NCP042507018	\$ 1,000.00	05/28/2007	\$

Make checks payable to N.C. Hazardous Waste Section and include your facility name and EPA ID number on your check.

CHROME EAST LLC Attn: CHUCK BAUMOHL or Current Facility Hazardous Waste Contact 788D CENTRAL DRIVE CABARRUS, NC 28027

REMIT To: N.C. Hazardous Waste Section 1646 Mail Service Center Raleigh, NC 27699-1646 phone: 919-508-8400

PLEASE RETURN THE TOP PORTION OF THIS INVOICE WITH PAYMENT

A. <u>Fees Requirements</u>: Pursuant to North Carolina General Statute 130A-294.1 you are required to pay fee(s) based on your hazardous waste management activities. The fee(s) are used to support government programs that ensure the safe management of hazardous waste. Failure to pay the required hazardous waste fee could result in an enforcement action with a penalty.

B. Explanation of Invoice Amount is Based on Your Current Generator Status:

CATEGORY	FEE	FACILITY STATUS	AMOUNT DUE
Large Quantity Generator	\$1000.00	Yes	\$1,000.00
		SUBTOTAL DUE	\$1,000.00
Waste Received	\$ 1.75/Ton		
Waste Generation	\$ 0.50/Ton		
· · · · · · · · · · · · · · · · · · ·	7	TOTAL AMOUNT DUE	······································

- C. <u>Who is Required to Pay?</u> You are required BY LAW to pay the fee(s) if your company notified that it is a generator, transporter, treater, storer or disposer of hazardous waste as defined below.
- 1. Large Quantity Generator (\$1000.00) : A facility who generates one kilogram or more of acute hazardous waste or 1,000 kilograms or more of hazardous waste in any calendar month during the year beginning July 1 and ending June 30. Large Quantity Generators are also required to pay an additional fee of \$0.50 per ton, or any part there of, for hazardous waste generated during the calendar year, up to a maximum of 25,000 tons. (Note: Large Quantity Generators must determine how much waste was generated, in tons rounded to the next highest ton, in the calendar year of 2004 and enter the calculated tonnage under the "Facility Status" column on the Waste Generation row in the above table. To calculate the amount due, multiply the amount generated by \$0.50 and enter that amount in the "Amount Due" column for Waste Generation. Total all the numbers in the "Amount Due" column for a Total Amount Due.)
- Small Quantity Generator (\$125.00): A facility who generates 100 kilograms or more of hazardous waste in any calendar month during the year beginning July 1 and ending June 30 but less than 1000 kilograms of hazardous waste in each calendar month during that year.
- 3. Transporter (\$600.00): A facility that transports hazardous waste.
- 4. <u>Treater, Storer or Disposer</u> (\$1,200.00): A treatment, storage, disposal facility shall pay an annual activity fee for each activity. (Note: A commercial hazardous waste storage, treatment, or disposal facility is also required to pay an additional fee of \$1.75 per ton, or any part thereof of hazardous waste stored, treated, or disposed of at the facility.)

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Please Refer to the Instructions for Filing Notification before completing this form,	APPLICATION FOR NUM		For Official Use only
The information requested here is required	N. C. Department of Environ	ment and Natural Resources	Application Date
by law (Section 3010 of the Resource	Division of Wass Hazardous W		
Conservation and Recovery Act).	401 Oberlin F Raicign, N	ld, Suite 150	Effective Date
			Expiration Date
LINSTALLATIONS	EPA ID NUMBER (Mark and "X" in	the appropriate box)	
A. First Notification	B. Subsequent Netification	Provisional EPA ID Number	6.P0425070 18
I. GENERATOR IN	ade company and specific site name		
NAME: Chrome	East, LLC	STC CODE NUM	BER
III. LOCATION OF IN	STALLATION Physical address. NO	TP. O. Nor or Routs Number)	
street : <u>788-/</u>	Central Drive		
city : CONC	ord	NC Zip Code: 2	8027
County : C. 2631	<u>ти5</u>		
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Contact Job Title:)	Contect Phone 70478	4-8900
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VI. DISPOSER Company Name:Ma	1140
$\frac{2}{2} \frac{1}{2} \frac{1}$	EPA ID: <u>NCR00003186</u>
Mailing Address: P.O. Box 37391	
Charlete M. 18357	
Contact Name: Cliff Workman Phone	Number: 207.332.5600
	707 363 0296
VIL DESCRIPTION OF HAZARDOUS WASTERS	
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	l_J
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DOOZ	
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Name of this substance Nitric acid - Nickel	
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Have you generated hazardous waste in the past?	
Will you generate hazardous waste in the future?	
VIII. CERTIFICATION	
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s have personally examined and an furnities with the information submitted in this and all same immediately responsible for obtaining the information, I believe that the submitted information	hed documents, and the based on my inquiry of those individuals is true, accuming, and complete. I am aways that there are significant
ponulties for submining alectoromation including the possibility of fines and imprisonment.	ulas hz
X March VP Menter X	<u>T/ 43/0 /</u>
	Signed
(Charles A Baunch/ Vice Piesidan	All Member

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Horth Carolina Department of Environment and Natural Resources

/ search, Mistupews, Director

Division of Waste Management

Michael F. Easiey, Governio William G. Ross Jr., Secretary

May 1, 2007

Charles Baumohl Chrome East LLC 788 D Central Drive Conover, NC 28027

Re: Provisional EPA ID Number NCP042507018

Dear Mr. Baumohl:

The above Provisional ID Number has been assigned to your facility as handler of hazardous waste. This number is to be used for the hazardous waste activity as described on the application. Specifically, the Provisional ID Number, issued to your facility is for the shipment of hazardous waste from the site identified on the application. This number is effective for a period of ninety (90) days only.

Effective January 1, 1986, all handlers of hazardous waste were required by N.C.G.S. 130A-294.1 to pay an annual fee G.S. 130-294.1 (e) requires that a person who generates greater than 1,000 kilograms (2,200 lbs) of Hazardous Waste in any calendar month during the year shall pay an annual fee of one thousand dollars (\$1,000.00).

In addition, N.C.G.S. 2-3512 states that a processing fee of \$25.00 will be charged for returned checks.

If you have any questions concerning this fee, please call Jim Edwards at (919)508-8539.

Sincerely,

Helen Cotton Programs Branch Head Hazardous Waste Section

Cc: Central Files (General) ∨Sean Morris



INVOICE

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an an the straight deviation

Invoice Number	Invoice Date	Your EPA ID #	Amount Due	Due Date	Show Amount Paid Here
HW9720	04/27/2007	NCP042507018	\$ 1,000.00	05/28/2007	\$

Make checks payable to N.C. Hazardous Waste Section and include your facility name and EPA ID number on your check.

CHROME EAST LLC Attn: CHUCK BAUMOHL or Current Facility Hazardous Waste Contact 788D CENTRAL DRIVE CONOVER, NC 28027 REMIT To: N.C. Hazardous Waste Section 1646 Mail Service Center Raleigh, NC 27699-1646 phone: 919-508-8400

PLEASE RETURN THE TOP PORTION OF THIS INVOICE WITH PAYMENT

A. <u>Fees Requirements</u>: Pursuant to North Carolina General Statute 130A-294.1 you are required to pay fee(s) based on your hazardous waste management activities. The fee(s) are used to support government programs that ensure the safe management of hazardous waste. Failure to pay the required hazardous waste fee could result in an enforcement action with a penalty.

B. Explanation of Invoice Amount is Based on Your Current Generator Status:

CATEGORY	FEE	FACILITY STATUS	AMOUNT DUE
Large Quantity Generator	\$1000.00	Yes	\$1,000.00
		SUBTOTAL DUE	\$1,000.00
Waste Received	\$ 1.75/Ton		
Waste Generation	\$ 0.50/Ton		
	7	TOTAL AMOUNT DUE	

C. <u>Who is Required to Pay?</u> You are required **BY LAW** to pay the fee(s) if your company notified that it is a generator, transporter, treater, storer or disposer of hazardous waste as defined below.

- 1. Large Quantity Generator (\$1000.00): A facility who generates one kilogram or more of acute hazardous waste or 1,000 kilograms or more of hazardous waste in any calendar month during the year beginning July 1 and ending June 30. Large Quantity Generators are also required to pay an additional fee of \$0.50 per ton, or any part there of, for hazardous waste generated during the calendar year, up to a maximum of 25,000 tons. (Note: Large Quantity Generators must determine how much waste was generated, in tons rounded to the next highest ton, in the calendar year of 2004 and enter the calculated tonnage under the "Facility Status" column on the Waste Generation row in the above table. To calculate the amount due, multiply the amount generated by \$0.50 and enter that amount in the "Amount Due" column for Waste Generation. Total all the numbers in the "Amount Due" column for a Total Amount Due.)
- Small Quantity Generator (\$125.00): A facility who generates 100 kilograms or more of hazardous waste in any calendar month during the year beginning July 1 and ending June 30 but less than 1000 kilograms of hazardous waste in each calendar month during that year.
- 3. <u>Transporter</u> (\$600.00): A facility that transports hazardous waste.
- 4. <u>Treater, Storer or Disposer</u> (\$1,200.00): A treatment, storage, disposal facility shall pay an annual activity fee for each activity. (Note: A commercial hazardous waste storage, treatment, or disposal facility is also required to pay an additional fee of \$1.75 per ton, or any part thereof of hazardous waste stored, treated, or disposed of at the facility.)

D. <u>Verify Contact Information, make correction(s) and sign</u>: (Note: EPA identification numbers are site specific, if you changed your physical location you must apply for a new number. Use EPA Form 8700-12 to apply for the identification number. See item F.2 below.)

	Company's Current Status	Corrections
Contact	CHUCK BAUMOHL	
Company Name	CHROME EAST LLC	
Mailing Address	788D CENTRAL DRIVE	
City, State & Zip	CONOVER, NC 28027	
Generator Status	Large Quantity Generator	
Transporter	No	
Treater	No	
Storer	No	
Disposer	No	

Certification: I certify under penalty of law that the above revisions were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalities for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Authorized Person	Print Name	Print Title	Date
Facility Contact (Regarding Fee Invoice)	Company Phone Number	Company Facsimile Number Number 8	E-mail Address

E. <u>Hazardous Waste Contact:</u>

1. Questions about billing process:

Phillystine Spinks at (919)508-8561 or Phillystine.Spinks@ncmail.net Larry Wilson at (919)508-8573 or Larry.Wilson@ncmail.net

2. Questions about the Regulations and Technical Assistance:

Ann Preston at (919)508-8559 or Ann.Preston@ncmail.net Doug Roberts at (919)508-8560 or Doug.Roberts@ncmail.net Lebeed Kady at (919)508-8546 or Lebeed.Kady@ncmail.net

F. Where Can I obtain?

- 1. Rules, Regulations and the General Statutes at the NC Hazardous Waste Rules web page: http://www.wastenotnc.org/HWHOME/WEBRules/NCHWRule.html
- 2. EPA Hazardous Waste notification of regulated waste activity (Form 8700-12): http://www.epa.gov/epaoswer/hazwaste/data/form8700/forms.htm

G. Useful Publications on the Internet:

- 1. Hazardous Waste Requirements for Large Quantity Generators (EPA: 530-F-96-032): http://www.epa.gov/epaoswer/hazwaste/gener/lqgpdf.pdf
- 2. Compliance Manual for Generators of Hazardous Waste (Compliance Branch, Hazardous Waste Section): http://www.wastenotnc.org/hwhome/LQGCOMPLIANCEMANUAL.pdf
- 3. Managing Your Hazardous Waste: A Guide for Small Businesses (EPA: 530-K-01-001): http://www.epa.gov/epaoswer/hazwaste/sqg/handbook/k01005.pdf

H. Where Can I Take my Waste?

Various Lists of Hazardous Waste Services: http://www.wastenotnc.org/HWHOME/Services_List_files/Services_List.htm

Inspection Notes

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Contact		D JASON	SMITH		(704)-7	84-89	18 -FAX	
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Subject: Re: Chrome East From: Doug Holyfield <Doug.Holyfield@ncmail.net> Date: Wed, 04 Apr 2007 13:49:14 -0400 To: Sean Morris <sean.morris@ncmail.net>

Afternoon.....I would suggest an IANOV (you can eliminate the Generator Closure requirements since there was no release(s) due to the fire). An IANOV would provide the push and severity of the situation due to their non-notification, get things labeled, dated, etc. and specify they were operating without a permit. I agree 110% that they need their power back on, or I would possibly push for an immediate removal action by the RPs and possibly EPA. Keep pushing for an answer on that part with Concord......Thanks.

Doug Holyfield NC DENR Winston-Salem Regional Office Division of Waste Management, Hazardous Waste Section 585 Waughtown Street Winston-Salem, NC 27107 Voice: (336) 771-5355 FAX: (336) 771-4631

On 4/4/2007 1:08 PM, Sean Morris wrote:

Doug,

Wanted to run a complaint I received by you to see if you agree with issuing a Long NOV. I received the complaint through Concord E.M. The facility caught fire last weekend, only minimal damage. The cause was a heater on one of the plating baths. They are a chrome plater. They have more than 2200 lbs of haz-waste on site, so they are currently a non-notified SQG. They have been open for 18 month. I was going to issue a NOV to address notification and SQG requirements. They may operate as a CESQG in the future. No releases to the environment resulted form the fire. The city has turned off their power because the building they are in is not zoned for a plating operation. They have a hearing on Jun19. I made a call to Concord EM because there are a lot of plating chemicals: acids, cyanides, solvents on site and it seems it would be a safer environment if the facility had power. No response yet. The business looks to be well run and the owners stated their intent to comply.

Doug Holyf	ield < <u>Dou</u> g	.Holyfield@N	ICmail.net>
WSRO	52.61	Morris wrote:	
NC DENR		i	· · · ·

Ang syaste on site, to use fine content of a leytas going to issue a NOV to address notified. I SON in the infine, is the use for

Inspection Notes

1028 LER. ANN Pt. NE 1028 LER. ANN LS LONGAN 28025 CHURNA STREET Facility Name: CHROME EAST Date: 4/4/07 Address: 788(D) rental DE. CONCOMPINE 28027 TIM NZEY -782-6800 Furth Contettes JASON SMITH CHUCK BAUMOHL-Contact: * FACILITY DEEN IN OPERATION FOR 18 MONTH'S 55-GALLON MURATIL ALLO. UNUSED. 4- CONTRINERS CAN'T USP (6) CONTRIVERS 55-GALLONS · 4 - FOOG SLUDGE · 2- CHRONE STRIP · 1-1/2 30.6 miss noiste From FIM WASTE NICKEL * DECROTUR G. EPPLOYER CHASAR WANDE For LOPPER TLATING. * FINS + BUMBERS * SMALL MOTON LYCLE PARTS MONTH SENT TO (A STEPL + Alun PAMS PLOTNG. For * ELECTRIC CONTROLED TON STORTED FIFT ON SUNDOY. clanger TAN- 10 HAG SECONDAW CONTAM STSTEM-MALL & PAUT STEMPER NEEDS TO BE MOVED AWA! FROM OTHER PLATING CHEMICALS * POWER HAS DEFN OFF SINKE THE FIFE. HEARING ON JUNE 19 - ZONING ISSUE MAY CLOSE BUSINESS, ASKING FOR VAMENCE. * ALARM SYSTEM - Sprink Eight to stop the content of



NC DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES DIVISION OF WASTE MANAGEMENT HAZARDOUS WASTE SECTION ACTIVITY REPORT

SUBMITTED TO J. EDWARDS

VIA EMAL ON 4/4/07

Date: 4/4/07 Reported by: Sean Morris

Subject: Chrome East, Inc

Name of Company or person in violation

Location: 788 D Central Drive, Concord, NC 28027

Mailing Address: _

If Different than location

City: Concord County: Cabarrus Zip Code: 28027

Contact Person: Chuck Baumohl, Owner (Owner, Operator, Manager, other)

Owner Address: 1028 Lee-Ann Drive NE Cannot be same as Location

City: Concord County: Cabarrus Zip Code: 28028

Reason for Visit: Site referral from City of Concord Emergency Management

Report:

Activity type: (Circle One) Complaint (04) Technical Assistance (CAV) Comprehensive evaluation (CEI) Case development (CDI) Used oil (UOI) Sampling (SPL) Compliance schedule (CSE)

Complaint Form

Date: 4/2/07 Site Name: CHROME EAST
Address: 788 CENTRAL DRIVE, CONCORD County: CABARRUS
Owner:Owner Contact #
Owner's Address:
Anonymous: Y N Complainant Name/Phone: JM SELLS - CONCORD EMERGENCY MANAG
Complaint Description: 980 - 521 - 0126
* FIPE AT LOCATION, SPILLS OCCUPED IN BUILDING DURING FIRE.
NO MOTERIAL LEFT AN SECONDARY CONTRINMENT AREA.
FACILITY APPEARS TO BE WELL PUN JOME INDILATION
THAT FACILITY MAY HAVE FINANCIAL PROPLEMS.
MR. SELLS NOTED SS-GALLON CONTAINERS TOUT THE
OWNER INDICATED NO WASTE WAS ONSTTE .
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(Use Back if Needed)
Directions to Facility or Property:
Referrals:
C DWQ-Aquifer Protection
C DWQ-Surface Water Protection
IC DAQ
SPA
County Agency
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610 East Center Avenue, Suite 301 Mooresville, North Carolina 28115 Telephone: 704-663-1699 Fax: 704-663-6040



TO: JIM SELLS	From: S. MORPIS
Fax: 704 - 782 - 3488	Pages: 6
Phone:	Date: 4 5/07
Re:	CC:

□ Urgent □ For Review □ Please Comment □ Please Reply □ Please Recycle

JIM.

ATTACHED IS THE NOTICE WE ISSUED TO CHROME EAST. ADDITIONAL INSPECTIONS WILL BE CONDUCTED IN THE FUTURE. LET ME KNOW WHAT THE CITY DECIDES ON THE POWER ISSUE. THANKS, SEAN