

File ID Number: HWCB2016 509

DEQ/DWM/Hazardous Waste Section

NCD/NCR (other) Number: NCO 991 302 542

Facility Name: Chrome East, LLC

Address: 321 Sign Drive City: Concord

County: Cabarrus

File Date Range: April 2007 - April 2010

Document Type (s)

Inspection Reports

*NOV (See Comments)

* Compliance Orders/Settlement Agreement (See Comments)

*(Provide NOV Type, Docket Number and Date of NOV in Comment Section)

Correspondence/Letters

Pictures (Tape to a full sheet of paper)

** Name Change and Date of Change

** (Write Name Change Information in Comment Section)

Sampling Data

Other Information (See Comments)

Comments:

Cd contains pictures

Box ID Number:

EPA ID Number: NC0991302542

Facility Name: CHROME EAST, LLC

Street: 321 SIGN DRIVE

City: CONCORD ZIP: 28027 County: CABARRUS

Contact Name: BOB BROWN Phone#: 704 407-376-7377

EVALUATION DATA New: Change: Delete:

Date: 04/22/2010 Evaluation Type: CEI

Date: / / Evaluation Type:

Inspector ID #: 046

Evaluation Comments:

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (check one):
 a SNC (SNY evaluation) Docket # _____
or
 no longer a SNC (SNN evaluation)

YES/NO CSE ONLY

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

Date Determined: / /

Branch: 01 Person: 046

Return to Compliance: / / / /
Scheduled Actual

Regulation Description: _____

Comment: _____

Hazardous Waste Section File Room Document Transmittal Sheet

I. Identification:

Fill out form completely and accurately before sending it to File Room

Your Name	SEAN MORRIS <small>Print Your Name Above (Last, First)</small>
EPA ID #	N C O 9 9 1 3 0 2 5 4 2
Facility Name	CHROME EAST, LLC <small>Facility's Name as it appears in RCRAInfo</small>

II. Document Type:

Highlight or Circle One Document Type below

General (G) <input type="checkbox"/> Notification 8700 (8700) <input type="checkbox"/> Hazardous Waste Report (HWR) <input type="checkbox"/> Fees/Invoices (F) <input type="checkbox"/> Technical Assistance (TA) <input type="checkbox"/> Compliance Assistance Visit (CAV) <input type="checkbox"/> Correspondences to/from Facility (GC) <input type="checkbox"/> Other (GO)	Permit (P) <input type="checkbox"/> Part A Application (PA) <input type="checkbox"/> Part B Application (PB) <input type="checkbox"/> Notice of Deficiency (NOD) <input type="checkbox"/> Permitting Information (PI) <input type="checkbox"/> Alternative to Post-Closure Permit (APC) <input type="checkbox"/> Correspondences to/from Facility (CP) <input type="checkbox"/> Other (PO)	Corrective Action (A) <input type="checkbox"/> Corrective Action Information (CAI) <input type="checkbox"/> RCRA Facility Assessment (RFA) <input type="checkbox"/> Confirmatory Sampling (CS) <input type="checkbox"/> RCRA Facility Investigation (RFI) <input type="checkbox"/> Interim Measures Study/Plan/Implemented (IM) <input type="checkbox"/> Corrective Measure Plan/Design (CMP) <input type="checkbox"/> Land Use Restriction, Institutional Controls (LUR) <input type="checkbox"/> Remediation System Effective Reports (RSER) <input type="checkbox"/> Corrective Measures Study (CMS) <input type="checkbox"/> HSWA Remedy (HSWA) <input type="checkbox"/> Correspondences to/from Facility (CA) <input type="checkbox"/> Other (AO)
Closure (C) <input type="checkbox"/> Closure Information (CI) <input type="checkbox"/> Closure Plan (CP) <input type="checkbox"/> Closure Report/Certification (CR) <input type="checkbox"/> Correspondences to/from Facility (CC) <input type="checkbox"/> Other (CLO)	Groundwater (W) <input type="checkbox"/> Groundwater Monitoring Report (GMR) <input type="checkbox"/> Comprehensive Monitoring Event (CME) <input type="checkbox"/> Correspondences to/from Facility (CW) <input type="checkbox"/> Other (WO)	
Financial (F) <input type="checkbox"/> Financial Record Review (FRR) <input type="checkbox"/> Mechanisms and instruments (MI) <input type="checkbox"/> Financial statements (FS) <input type="checkbox"/> Balance sheets (BS) <input type="checkbox"/> Tax returns (TR) <input type="checkbox"/> Insurances (I) <input type="checkbox"/> Correspondences to/from Facility (FC) <input type="checkbox"/> Other (FO)	Inspection/Investigation (I) <input type="checkbox"/> Compliant Investigation (CMP) <input checked="" type="checkbox"/> Compliance Evaluation Inspection (CEI) <input type="checkbox"/> Case Development Inspections (CDI) <input type="checkbox"/> Compliance Schedule Evaluation (CSE) <input type="checkbox"/> Focused Compliance Inspection (FCI) <input type="checkbox"/> Emergency Response (EMR) <input type="checkbox"/> Correspondences to/from Facility (CI) <input type="checkbox"/> Other (IO)	Enforcement (E) <input type="checkbox"/> Ticket Notice of Violation (TNOV) <input type="checkbox"/> Notice of Violation (NOV) <input type="checkbox"/> Immediate Action Notice of Violation (IANOV) <input type="checkbox"/> Enforcement Package (EP) <input type="checkbox"/> Compliance Order (CO) <input type="checkbox"/> Administrative Order on Consent (AOC) <input type="checkbox"/> Settlement Agreement (SA) <input type="checkbox"/> Correspondences to/from Facility (EC) <input type="checkbox"/> Other (EO)
Miscellaneous (M)		

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
	<small>Month</small>	<small>Day</small>	<small>Year</small>

V. File Room Use Only:

Date Received			
	<small>Month</small>	<small>Day</small>	<small>Year</small>
Date Scanned			
	<small>Month</small>	<small>Day</small>	<small>Year</small>
Date Returned			
	<small>Month</small>	<small>Day</small>	<small>Year</small>
Scanners Initials			

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. Report:

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. Waste Type:

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

EPA ID Number: NC0991302542

Facility Name: CHROME EAST LLC

Street: 321 SIXN DRIVE

City: CONCORD ZIP: 29027 County: CABARRUS

Contact Name: * SHANNON ERMAN Phone#: _____

EVALUATION DATA New: X Change: _____ Delete: _____

Date: 07/21/2009 Evaluation Type: CPI

Date: / / Evaluation Type: _____

Inspector ID #: 046

Evaluation Comments: _____

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (check one):

a SNC (SNY evaluation) Docket # _____
or
 no longer a SNC (SNN evaluation)

YES / NO CSE ONLY

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

Date Determined: / /

Branch: 01 Person: 046

Return to Compliance: / / / /
Scheduled Actual

Regulation Description: _____

Comment: _____

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
5. **Purpose of Inspection:** 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. Waste Type:

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.

 7/24/09
INSPECTOR (DATE)

(SENT BY US MAIL)
FACILITY CONTACT

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

1030C

Form Approved OMB No. 2050-0039

Please print or type (Form designed for use on 486 (12-pin) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator ID Number NC0991382542	2 Page 1 of 1	3 Emergency Response Phone 310-650-4776	4 Manifest Tracking Number 005215810 JJK	
5 Generator's Name and Mailing Address CHROME EAST, INC 301 SIXTH DRIVE COPPER, NC 28027 Generator's Site Address (if different than mailing address) Generator's Phone: 704 784-3588						
6 Transporter 1 Company Name STAT, INC			U.S. EPA ID Number NC09950799142			
7 Transporter 2 Company Name Midway Environmental Transport			U.S. EPA ID Number 10H000000539			
8 Designated Facility Name and Site Address ENVIRONMENTAL ENTERPRISES INCORPORATED 4330 SPRING BROOK AVENUE DURHAM, NC 27722			U.S. EPA ID Number 08H003327010			
Facility's Phone: (512) 541-1823						
GENERATOR	9a. HAZ	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. UN Hazard Class
	X	1. SOL WASTE CORROSIVE, LIQUID, ACIDIC, INORGANIC, N.O.S., (HYDROFLUORIC ACID), & UN2814, PGII, ERG154, 296610	016	DM	6400	2802
	X	2. SOL WASTE CORROSIVE, LIQUID, ACIDIC, INORGANIC, N.O.S., (COPPER), S, UN2814, PGII, ERG154, 296624	003	DM	1200	XP
	X	3. SOL HAZARDOUS WASTE LIQUID, N.O.S., (SULFURIC ACID), UN2802, PGII, ERG171, 296602	001	DM	400	2802
14. Special Handling Instructions and Additional Information A: 48619-04-04536-35 B: 48624-04536-38 04539 W00#05-110276						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this assignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If equal shipment and I am the Primary Exporter, I certify that the contents of this certification conform to the terms of a signed EPA Acknowledgment of Consent. I certify that the entire manifest and supporting documents are in full compliance with 40 CFR 262.27(a) if I am a large quantity generator or (b) if I am a small quantity generator by volume. Generator's/Offeror's Printed/Typed Name: <i>[Signature]</i> Skehan Month Day Year: 12/5/09						
16. International Shipments <input type="checkbox"/> Import by U.S. <input type="checkbox"/> Export to U.S. <input type="checkbox"/> Export to other country Transporter signature (for exports only): <i>[Signature]</i> Date leaving U.S.: 12/5/09						
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: GARY HAWTZ <i>[Signature]</i> Month Day Year: 12/5/09					
	Transporter 2 Printed/Typed Name: John Gishan <i>[Signature]</i> Month Day Year: 10/2/09					
DESIGNATED FACILITY	18. Emergency 18a. Discrepancy Indication Space: <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection 200 affected discrepancy report Manifest Reference Number: U.S. EPA ID Number:					
	19. Hazardous Waste Report Management Method Codes (e.g., codes for hazardous waste treatment, disposal, and recycling systems) 1. H141 2. H146 3. H161 4.					
	20. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a. Printed/Typed Name: Steve McCollin <i>[Signature]</i> Month Day Year: 12/25/09					

10300

Form Approved OMB No 2050-0039

Provide print or type. (Form designed for use on 12-pitch typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator ID Number NC 0991302542	2 Page 1 of 1	3 Emergency Response Phone 910-680-8776	4 Manifest Tracking Number 005215809 JJK		
5 Generator's Name and Mailing Address CHROME EAST, INC. 521 STEW DRIVE CONCORD, NC 28027			Generator's Site Address (if different than mailing address)				
Generator's Phone 704 704-8900			U.S. EPA ID Number NC 0991302542				
6 Transporter 1 Company Name STANT, INC.			U.S. EPA ID Number OH 00000538				
7 Transporter 2 Company Name Advanced Environmental Transport			U.S. EPA ID Number				
8 Designated Facility Name and Site Address ENVIRONMENTAL ENTERPRISES INCORPORATED 1430 SPRING GROVE AVENUE CONCORD, OH 43022			U.S. EPA ID Number OH 00000538				
Facility's Phone 614 330 5110			OMB # 2050-0039				
HAZ	9a U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10 Containers		11 PGM Quantity	12 Unit Wt./Vol.	13 Waste Codes	
		No	Type				
X	1. LIQ. WASTE HYDROCARBON, LIQUID, N.O.S., (GROSS HYDROCARBON), 3, N.O.S., PGIII, EN00171, W0616	009	DN	3600	6	0002	
X	2. LIQ. HYDROCARBON WASTE, LIQUID, N.O.S., (GROSS HYDROCARBON), 3, N.O.S., PGIII, EN00171, W0616	013	DN	5200	6	0002	
Y	3. LIQ. WASTE CORROSIVE, LIQUID, ACIDIC, INORGANIC, N.O.S., (SODIUM HYDROXIDE, 5, N.O.S., PGII, EN00171, W0616)	015	DN	1000	6	0002	0007
Y	4. LIQ. WASTE CORROSIVE LIQUID, BASIC, INORGANIC, N.O.S., (SODIUM HYDROXIDE, 5, N.O.S., PGII, EN00171, W0616)	017	DN	1000	6	0002	0007
14 Special Handling Instructions and Additional Information 09-0916-24 A: W0616 B: W0616 0462537 W0+03-111296 W0+03-111296							
15 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded and are in all respects in proper condition for transport according to applicable international and national governmental regulations. I am the Primary Exporter. I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste information statements referenced in 40 CFR 262.27(a) (1) are a large quantity generator or (2) (1) are a small quantity generator as true.							
Generator's Name (Printed/Typed Name) Paul Skelton, COO			Signature 		Month Day Year 12/5/09		
16 International Shipment <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit Date leaving U.S.:							
17 Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name GARY NICHOLS			Signature 		Month Day Year 05/07		
Transporter 2 Printed/Typed Name John G. ...			Signature 		Month Day Year 02/09		
18 Discrepancy 18a Discrepancy Indication Codes: <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input checked="" type="checkbox"/> Residual <input type="checkbox"/> Partial Payment <input type="checkbox"/> Full Rejection See attached discrepancy report							
18b Manifest Reference Number							
19 Designated Facility (or Generator) 19a Facility's Name 19b Facility's Phone 19c Signature of Alternate Facility (or Generator) Month Day Year							
20 Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
21 Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Printed/Typed Name: Steve P. ... Signature: Steve P. ... Month Day Year: 09/26/09							

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number # 00991302542	2. Page 1 of 1	3. Emergency Response Phone 712-628-8776	4. Manifest Tracking Number 005215809 JJK		
5. Generator's Name and Mailing Address EUREX EAST, INC 371 SIGN DRIVE COLUMBUS, NC 28027		Generator's Site Address (if different than mailing address)					
Generator's Phone: 704-794-8999							
6. Transporter 1 Company Name				U.S. EPA ID Number			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address ENVIRONMENTAL ENTERPRISES INCORPORATED 4630 SPRING GARDEN AVENUE COLUMBIANA, OH 45822				U.S. EPA ID Number			
Facility's Phone: (513) 541-1823				018083377010			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
1	RD, WASTE HAZARDOUS, LIQUID, N.O.S., STRONTIUM HYDROXIDE), 9, UN3092, PGIII, EM0171, #0616		DM		G	0007	
2	RD, HAZARDOUS WASTE, LIQUID, N.O.S., CHROME, STRONTIUM HYDROXIDE), 9, UN3092, PGIII, EM0171, #0616		DM		G	0007	
3	RD, WASTE CORROSIVE, LIQUID, ACIDIC, IRREGULAR, N.O.S., CHROME, HYDROCHLORIC ACID), 8, UN2534, PGII, EM0154, #0616		DM		G	0002	0007
4	RD, WASTE CORROSIVE LIQUID, BASIC, DENDRATIC, N.O.S., (STRONTIUM HYDROXIDE, CHROME), 8, UN2534, PGII, EM0154, #0616		DM		G	0002	0007
14. Special Handling Instructions and Additional Information A: 0616 C: 0625 B: 0628 D: 0618							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (c) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name: Paul Skelton, COO Signature: [Signature] Month: 12 Day: 5 Year: 09							
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: GARY NANTZ Signature: [Signature] Month: 05 Day: 09 Year: 09 Transporter 2 Printed/Typed Name: Signature: Month: Day: Year:							
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: U.S. EPA ID Number:							
18b. Alternate Facility (or Generator) U.S. EPA ID Number: Facility's Phone:							
18c. Signature of Alternate Facility (or Generator) Month: Day: Year:							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 2. 3. 4.							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name: Signature: Month: Day: Year:							

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NC0991302542	2. Page 1 of 1	3. Emergency Response Phone 910-680-8776	4. Manifest Tracking Number 005215810 JJK		
5. Generator's Name and Mailing Address HEBE ENST, INC 321 STON DRIVE CONCORD, NC 28027				Generator's Site Address (if different than mailing address)			
Generator's Phone: 704-751-8800							
6. Transporter 1 Company Name				U.S. EPA ID Number			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address ENVIRONMENTAL ENTERPRISES INCORPORATED 4650 SPRING BREE AVENUE CINCINNATI, OH 45222				U.S. EPA ID Number OH00053377010			
Facility's Phone: (513) 541-1822							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol.	13. Waste Codes	
		No.	Type				
X	1. RD, WASTE CORROSIVE, LIQUID, ACIDIC, INORGANIC, N.O.S., (HYDROCHLORIC ACID), 8, UN254, PGII, ENH15A, #6619		DN	6	P	D002	R007
X	2. RD, WASTE CORROSIVE, LIQUID, ACIDIC, INORGANIC, N.O.S., (SULFURIC ACID), 8, UN254, PGII, ENH15A, #6624		DN	6	S	R002	
X	3. RD, HAZARDOUS WASTE LIQUID, N.O.S., (METHYLENE CHLORIDE), 9, UN3002, PGIII, ENH171, #6622		DN	6	S	F001	
	4.						
14. Special Handling Instructions and Additional Information A: 6619 C: 6622 B: 6624 D:							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(e) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offetor's Printed/Typed Name <i>[Signature]</i>						Signature <i>[Signature]</i>	
						Month Day Year 2 5 09	
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name GARY NANTZ				Signature <i>[Signature]</i>		Month Day Year 2 5 09	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator)				U.S. EPA ID Number			
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a.							
Printed/Typed Name				Signature		Month Day Year	

ENVIRONMENTAL ENTERPRISES, INC.
RESTRICTED WASTE NOTIFICATION & CERTIFICATION

Generator: CHROME EAST Manifest Document No. 005215810JJK 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.

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 attached: EEL's Restricted Waste Notification & Certificate for Underlying Hazardous Constituent Treatment Standards.

EEL Profile Number	1. Waste Code	2. Treatability 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	
V6624	D002	NWW		A	
V6622	F001	NWW		A	

FOR ADDITIONAL PROFILES, USE ATTACHED CONTINUATION FORM.

CERTIFICATION! (Please sign)

The information provided is true and correct and is based on analysis of a representative sample of the waste in accordance with EPA guidelines Document SW-846 EPA 600/12-80018 or on my thorough knowledge of the waste.

Signature X 

Title X COO

Date X 2/15/09

HOW WASTE MUST BE MANAGED

A. 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.

B. RESTRICTED WASTE THAT CAN BE LANDFILLED WITHOUT FURTHER TREATMENT

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 CFR 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)

C. RESTRICTED WASTE TREATMENT TO PERFORMANCE 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 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."

D. RESTRICTED WASTE FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)

"I certify under penalty of law that the waste has been treated in 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 fines 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 packs 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

- 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 part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."
- G. **THIS RESTRICTED DEBRIS HAS BEEN TREATED IN ACCORDANCE WITH 40 CFR 268.45.** "I certify under penalty of law that the debris has been 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 268.** "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."
- I. **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 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 possibility of fine and imprisonment."
- J. **THIS RESTRICTED WASTE HAS BEEN TREATED TO REMOVE THE HAZARDOUS CHARACTERISTIC AND BEEN TREATED FOR 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."
- K. **THIS RESTRICTED WASTE IS SUBJECT TO AN EXEMPTION FROM LAND DISPOSAL.** (Please include the date the waste is subject to the prohibitions 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)
- L. **THIS DECHARACTERIZED WASTE CONTAINS UNDERLYING HAZARDOUS CONSTITUENTS THAT REQUIRE FURTHER TREATMENT TO MEET UNIVERSAL TREATMENT 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/DOES NOT* (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 Hazardous Constituent Treatment Standards' for treatment standard

F001 & F002	F003	F004	F005
44) Carbon Tetrachloride	4) Acetone	65 & 66) Cresols (m & p isomers)	25) Benzene
48) Chlorobenzene	35) n-Butyl Alcohol	64, 65, & 66) Cresylic Acid Mixed (o, m, p isomers)	43) Carbon Disulfide
81) 1,2 Dichlorobenzene	68) Cyclohexanone	64) O Cresols	144) Isobutanol
157) Methylene Chloride	121) Ethyl Acetate	150) Methanol	158) Methyl Ethyl Ketone
214) Tetrachloroethylene	122) Ethyl Benzene	159) Methyl Isobutyl Ketone	206) Pyridine
225) 1,1,1 Trichloroethane	124) Ethyl Ether	238) Xylene	219) Toluene
226) 1,1,2 Trichloroethane	150) Methanol		
233) 1,1,2 Trichloro-1,2,2 Trifluoroethane	159) Methyl Isobutyl Ketone		
227) Trichloroethylene	238) Xylene		
228) Trichlorofluoromethane			

EEI PERMITTED WASTE CODES THAT HAVE SUBCATEGORIES

Codes	Legend #	Subcategory
D001	D1A	High TOC ignitable liquids. $\geq 10\%$ TOC
	D1B	Ignitable characteristic Wastes except high TOC $> 10\%$ ignitable liquids
D003	D3A	Reactive Sulfides
	D3B	Other Reactives
	D3C	Water Reactive
	D3D	Reactive Cyanide
	D3E	Explosives
D006	D6A	Cadmium Containing Batteries
D008	D8A	Lead Acid Batteries
D009	D9A	Non-wastewater High Mercury-Organic Subcategory (≥ 260 PPM total Mercury)
	D9B	Non-wastewater High Mercury-Inorganic Subcategory
	D9C	Non-wastewater that contains ≤ 260 mg/kg total mercury (Low Mercury Subcategory)
F003	F3A	Wastes that contain only one or more of the following solvents: carbon disulfide, cyclohexane, and/or methanol
F005	F5A	Wastes that contain only one or more of the following solvents: carbon disulfide, cyclohexane, and/or methanol
	F5B	Contains only 2-Nitropropane
	F5C	Contains only 2-Ethoxyethanol
K069	K69A	Calcium Sulfate (Low Lead)
	K69B	Non-Calcium Sulfate (High Lead)
P092	P92A	Phenyl mercuric acetate non-wastewaters, regardless of their total mercury content, that are not incinerator residues or are not residues from RMERC

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 991 302 542
None

Facility Name: CHROME EAST, LLC

Street: 321 SIGN DRIVE

City: CONROE ZIP: 28027 County: CASHERUS

Contact Name: JASON SMITH Phone#: 704-784-8900

EVALUATION DATA New: Change: Delete:

Date: 04/15/2008 Evaluation Type: CEI

Date: 07/25/2008 Evaluation Type: CSE

Inspector ID #: 046

Evaluation Comments:

LONG FORM NOW ISSUED.

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (check one):

a SNC (SNY evaluation)

Docket # _____

or

no longer a SNC (SNN evaluation)

YES / NO CSE ONLY

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

Date Determined: 04/15/2008

Branch: 01

Person: 046

Return to Compliance: 07/07/08

Scheduled

07/25/08

Actual

Regulation Description: GS 130A-294.1 (e)

Comment: _____

Date Determined: 04 / 15 / 08

Branch: 01

Person: 046

Return to Compliance:

07 / 07 / 08
Scheduled

07 / 25 / 08
Actual

Regulation Description: 40 CFR 262.11

Comment: _____

Date Determined: ___ / ___ / ___

Branch: 01

Person: 046

Return to Compliance:

___ / ___ / ___
Scheduled

___ / ___ / ___
Actual

Regulation Description: _____

Comment: _____

Date Determined: ___ / ___ / ___

Branch: 01

Person: 046

Return to Compliance:

___ / ___ / ___
Scheduled

___ / ___ / ___
Actual

Regulation Description: _____

Comment: _____

Date Determined: ___ / ___ / ___

Branch: 01

Person: 046

Return to Compliance:

___ / ___ / ___
Scheduled

___ / ___ / ___
Actual

Regulation Description: _____

Comment: _____

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

RCRA RE-INSPECTION REPORT

- 1. Facility Information: Chrome East, LLC
321 Sign Drive
Concord, NC 28027-6117
NCO 991 302 542
- 2. Facility Contact: Mr. Jason Smith, Owner
704-784-8900
- 3. Survey Participants: Mr. Jason Smith
Mr. Brian Polk, DWM Safety Consultant
Mr. Sean Morris, Environmental Senior Specialist
- 4. Date of Re-Inspection: July 25, 2008
Date of Report: July 25, 2008
- 5. Purpose 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.

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. Reminders:

- 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.

 7/25/03
INSPECTOR (DATE)

SENT US MAIL
FACILITY CONTACT

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

Sean



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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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.

- (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:
- (1) 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

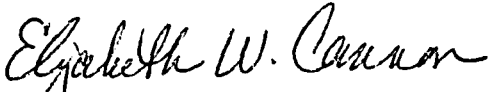
Respondent shall provide a written certification with supporting documentation on company letterhead confirming the noted compliance schedule has been completed. Mail this certification to Mr. Sean Morris, Environmental Senior Specialist at Mooresville Regional Office, 610 East Center Avenue, Suite 301,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

A handwritten signature in cursive script that reads "Elizabeth W. Cannon".

Elizabeth W. Cannon, Chief
Hazardous Waste Section

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

7007 1490 0004 4506 5358

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MAY 13 2008

To Mr. Jason Smith
 Chrome East
 321 Sign Dr.
 Concord NC 28027-6117

HW-SM

WILLE NC

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. **Waste Type:**

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

8. **Site Deficiencies:**

- **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. Reminders:

- 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.

 5/12/08
INSPECTOR (DATE)

(SENT BY CERTIFIED MAIL)
FACILITY CONTACT

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



Elaine F. Marshall
Secretary

North Carolina
**DEPARTMENT OF THE
SECRETARY OF STATE**

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

CORPORATIONS

Date: 4/18/2008

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Corporation Names

Name	Name Type
NC ChromeEast, LLC	Legal

Limited Liability Company Information

SOSID:	1015345
Status:	Current-Active
Date Formed:	12/5/2007
Citizenship:	Domestic
State of Inc.:	NC
Duration:	Perpetual

Registered 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
Principal Mailing Address:	5113 Piper Station Drive Suite 206 Charlotte NC 28277

LINKS & LEGISLATION

- KBBE B2B Annual Reports
- SOSID Number Correction
- 2001 Bill Summaries
- 1999 Senate Bills
- Annual Reports 1997
- Corporations 1997
- Register for E-Procurement
- Dept. of Revenue

ONLINE ORDERS

- Start An Order
- New Payment Procedures

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

Date: 4/15/08 Reported by: SEAN MORRIS

Subject: CHROME EAST, LLC
Name of Company or person in violation

Location: 321 SIGN DRIVE, CONCORD, NC 28027-6117
Site address

Mailing Address: _____
If Different than location

City: _____ County: CABARRUS Zip Code: ~~28027~~

Contact Person: JASON SMITH LONNY BERNATH - REGISTERED
(Owner, Operator, Manager, other) AGENT

Owner Address: 5113 PIPER STATION DR. SUITE 206
Cannot be same as Location

City: CHARLOTTE County: MECKLENBURG Zip Code: 28277

Reason for Visit: COMPLIANCE INSPECTION

Report: JIM, ADDRESS ALREADY HAS AN EPA ID NCD 991 302 542.

Activity type:
(Circle One)

- Complaint (04)
- Technical Assistance (CAV)
- Comprehensive evaluation (CEI)
- Case development (CDI)

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

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CESQG	2. Page 1 of 1	3. Emergency Response Phone 704-784-8900	4. Manifest Tracking Number 004128505 JJK	
5. Generator's Name and Mailing Address Chrome East 321 Sign Drive CONCORD, N.C. 28027			Generator's Site Address (if different than mailing address)			
Generator's Phone: 704-267-4336 704-784-8900						
6. Transporter 1 Company Name HAZ-MAT Transportation & Disposal				U.S. EPA ID Number NCRC00003186		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address Chemtron Corporation 35850 Schneider Court AVON, OHIO 44011				U.S. EPA ID Number OHDC66060609		
Facility's Phone: (440-937-6348)						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. "RQ" Hazardous Waste, Liquid, N.O.S., (Chromium), 9, NA3082, PG III (D007)	039	DF	2145	G	D007
X	2. "RQ" Waste, Cyanide Solution, N.O.S., (Copper Cyanide), 6.1, UN1935, PG II (D003)	003	DF	0165	G	D003
14. Special Handling Instructions and Additional Information 9.A ERG# 171 9.B ERG# 157						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offeror's Printed/Typed Name X Jason Smith				Signature X [Signature]		Month Day Year X 02 15 08
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name Clifton Workman				Signature Clifton Workman		Month Day Year 02 15 08
Transporter 2 Printed/Typed Name				Signature		Month Day Year
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number:						
18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator)						Month Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) -						
1.	2.	3.	4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name				Signature		Month Day Year

Division of Waste Management
Hazardous Waste Section
Complaint Information

Complainant:

DISPOSING OF PLATING RINSE SOLUTIONS
IN TOILET.

* COMPLAINT INVESTIGATION INCLUDED W/ CSE REPORT

Location:

CHROME EAST
321 SIGN DRIVE
CONCORD, NC

Directions:

Caller Information

Name: ANONYMOUS - RECEIVED BY DENR CALL CENTER
Address
Phone: (H) (W)

Received by: S. MORRIS Date: 6/17/08

Referred To: BEVELLY METCALF - WSACL PRE-TREATMENT Date:

cc: Brent Burch or
Ted Cashion

7/25/08

BEVERLY METCALF

EVAPORATOR SYSTEM

(1) 30-Gallon container
LIQUID / SLUDGE FROM
FLOOR AREA.

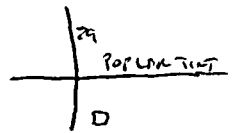
LEAKS AROUND
CHROME RINSE

* NC DOL COMPUTER IMPROVEMENTS A WEEK
CONDUCTED AIR MONITORING.

LAYS UPSTAIRS
LAYS W NEW LINE ROOM

* EVAPORATION SYSTEM
GOING TO BE
INSTALLED.

9:30 AM 7/25



PUNCHY'S

B. METCALF - 788-4164 x 12

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>

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

6/19/08 - spoke w / BEVERLY METCALF w / CATAWBA COUNTY PRE-TREATMENT. EXPLAINED COMPLAINT. SHE IS GOING TO CHECK W/ CITY TO SEE IF THEY CAN SAMPLE FROM POTW.

7/1/08 - LEFT MESSAGE FOR B. METCALF AND GAVE HER THE COMPLAINANT PHONE #. TOLD HER COMPLAINANT WANTS TO STAY ANONYMOUS.
~~2008~~

7/15/08 - KEVIN LAPORTE / EPA CID / CALLED TO DISCUSS COMPLAINT. HE WAS CONTACTED BY BEVERLY METCALF. MR. LAPORTE 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 <edythe.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 is 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

~~COMPLAINANT~~

BEVERLY

704.788.4164 x 12 @

Inspection Notes

* NCO

6/2/08
991 302 542
LOG

Date: 7/3/08 Site Name: CHROME EAST

Address: County: CADDOUS

Contact / Phone #:

Participants: BRIAN POLK
JASON SMITH

Weather Conditions:

Notes:	* ALUM	* STEEL
	* CLEAN	* CLEAN
	* SODIUM HYDROXIDE	ACTIVATE - SULFURIC 1%
	* ACID DEPOSIT RINSE	RINSE
	* ED. ZINC RINSE	BRIGHT MICKEL
	* MICKEL RINSE	CHROME
	* SPRAY & BACK WASH	RINSE
	* RINSE	

* SPRINKLER

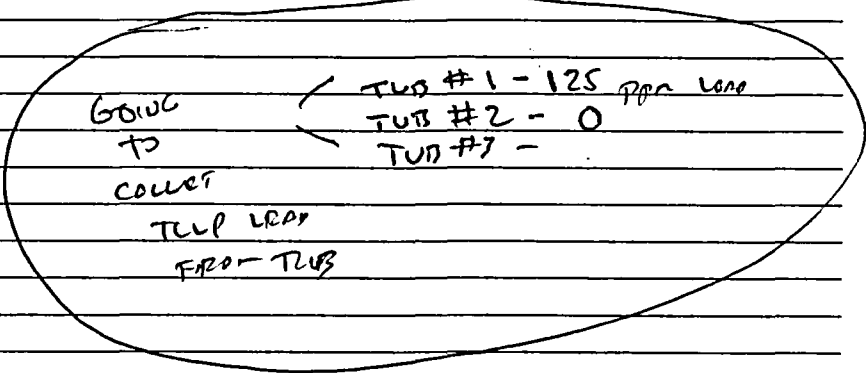
* TRIPLE PLATE CATALYST
USE CYANIDE
* COPPER

COMPLETION 100 ppm lead



3 PLASTIC TUBS 100-GALLON
EACH - w/ SOIL / SAND TRAP

HAZ MAT IS
SHAOWN TO
CONTAIN



Photographs (time and locations): _____

Documents Copied: _____

Site Drawing: B. METCALF spoke w/ complainant.

* COMPLAINANT SAID WORKED 8-MONTHS - DURING 20-25 THUS
EX-EMPLOYEE WAS FIRM FOR TELLING TO STOP. OWNER
HAS STATED ITS TOO EXPENSIVE TO DISPOSE OF HAZ-WASTE

Referrals:

- NC DWQ-Aquifer Protection _____
- NC DWQ-Surface Water Protection _____
- NC DAQ _____
- Solid Waste Section _____
- EPA _____
- County Agency _____
- Other _____

Inspection Notes

Date: 4/15/09 Site Name: CHROME EAST LLC

Address: 321 SIGN DRIVE, CONCORD, NC 28027-6117 County: CABARRUS

Contact / Phone #: JASON SMITH
~~XXXXXXXXXX~~

Notes: CHROME PLATING OPERATION

- NO RINSE WASTE GENERATED

• SULFURIC / WATER CHANGE ANNUALLY - ~~400~~ 150-GALLONS

• NITRIC ACID ANNUALLY - 25-GALLON

- GOING CYANIDES

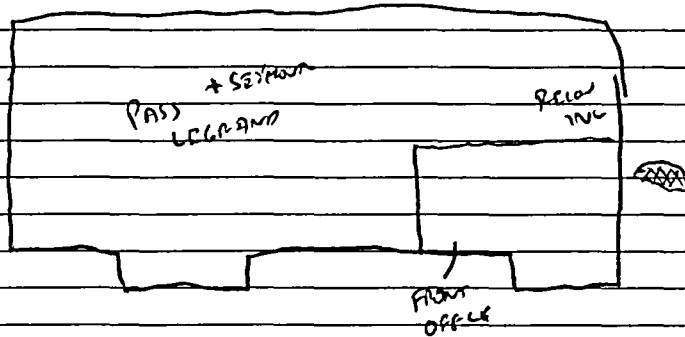
RINSE OVER TOP OF TANKS BACK INTO TANKS

• NO WASTE QUOTE AT TIME OF INSPECTION.

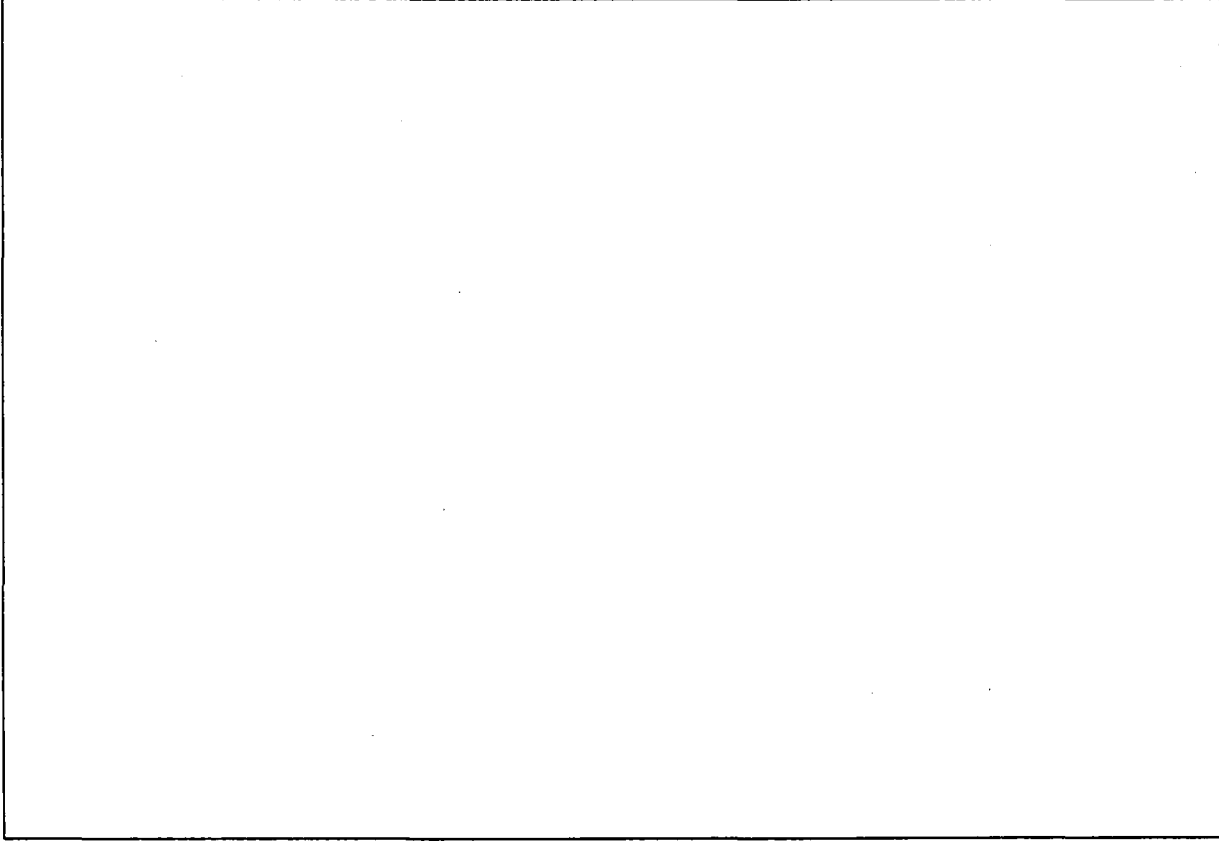
HAZ-MATE

• AREA OUT BACK - BEAD BLAST MATERIAL ON GROUND BESIDE SIDE DOOR

• NON-NOTIFICATION



Site Drawing:



Referrals:

NC DWQ-Aquifer Protection _____

NC DWQ-Surface Water Protection _____

NC DAQ _____

Solid Waste Section _____

EPA _____

County Agency _____

Other _____

Complaint Form

Date: 10/15/07 Site Name: CHROME EAST

Address: _____ County: CONCORD, NC

Owner: _____ Owner Contact # 704-453-7432

Owner's Address: _____

Anonymous: Y/N Complainant Name/Phone: _____
* RISHI - PROPERTY OWNER
818-522-0915

Complaint Description: JASON →

* CHROMIC ACID - OVER-FILLED, SECONDARY CONTAINMENT TANK. PUMPED INTO STORAGE TANK.
SPILED
* PLAIN WATER WAS ~~SPILLED~~ ON OUTSIDE OF CONTAINMENT
* BROKEN VALVE ON WATER LINE TO CHROMIC ACID TANK.
TALKED TO CHUCK BAUMOHL ON 10/15/07 - PHONE

* REFERRED FROM DWQ.
* TALKED TO RISHI BY PHONE 10/15/07. HE WANTED SOMEONE TO
LOOK AT VISIT SITE. I REFERRED TO (Use Back if Needed)
BRUCE PARRISH.

Directions to Facility or Property:
* TALKED w/ JIM SELLS 10/16/07 - GAVE DETAILS OF
SPILL

Referrals:
NC DWQ-Aquifer Protection _____
NC DWQ-Surface Water Protection _____
NC DAQ _____
Solid Waste Section _____
EPA _____
County Agency - JIM SELLS - CONCORD EMERGENCY MANAG.
Other INSB - TALKED w/ BRUCE PARRISH

Additional Notes: _____

Action Taken: _____



SAMPLES COLLECTED
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

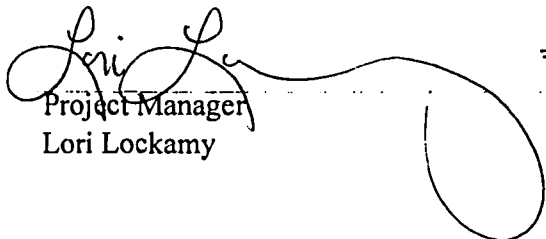
Dear Mr. Polk:

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 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.


Project Manager
Lori Lockamy

7/14/08
Date



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

% solids = 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.



Results for Metals

Client Sample ID: tub 1
Client Project ID: Chrome East
Lab Sample ID: G443-515-4
Lab Project ID: G443-515
Batch ID: 11843 11845

Analyzed By: DCP
Date Collected: 7/3/2008 00:00
Date Received: 7/8/2008
Matrix: 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	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	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

Reviewed By: 
METALS.XLS



Results for Metals


Client Sample ID: tub 2
Client Project ID: Chrome East
Lab Sample ID: G443-515-5
Lab Project ID: G443-515
Batch ID: 11843 11845

Analyzed By: DCP
Date Collected: 7/3/2008 00:00
Date Received: 7/8/2008
Matrix: 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	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

Reviewed By: 
METALS.XLS



Results for Metals

Client Sample ID: tub 3
Client Project ID: Chrome East
Lab Sample ID: G443-515-6
Lab Project ID: G443-515
Batch ID: 11843 11845

Analyzed By: DCP
Date Collected: 7/3/2008 00:00
Date Received: 7/8/2008
Matrix: 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	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

Reviewed By: 
METALS.XLS



Results for Metals

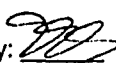
Client Sample ID: Lab Blank
Client Project ID:
Lab Sample ID: pb11845
Lab Project ID:
Batch ID: 11845

Analyzed By: PSW
Date Collected:
Date Received:
Matrix: 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	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

Reviewed By: 
METALS.XLS



Results for Metals

Client Sample ID: Lab Blank
Client Project ID:
Lab Sample ID: pb11843
Lab Project ID:
Batch ID: 11843

Analyzed By: DCP
Date Collected:
Date Received:
Matrix: Leachate

Metals	Result	RL	DF	Units	Method	Date Analyzed
TCLP						
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

Reviewed By: 
METALS.XLS



METALS Results for LCS/LCD

ICP Batch: 11845
HG Batch: 11843
Other:

Matrix: WATER
Units: MG/L

Analyte	TRUE Value	LCS	LCS %REC	LCD	LCD %REC	Limit		RPD	RPD Limit
						Lower	Upper		
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

Analyte	Sample Result	SA MS	MS Result	MS %REC	SA MSD	MSD Result	MSD %REC	Limit		RPD	RPD Limit
								Lower	Upper		
Arsenic	BQL	4.00	3.98	99.5	4.00	4.09	102	75	125	2.73	20
Barium	BQL	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

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

Reviewed By:



CHAIN OF CUSTODY RECORD
SGS Environmental Services Inc.

Locations Nationwide
 • Alaska • Hawaii
 • Ohio • Maryland
 • New Jersey • North Carolina
 • West Virginia
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089



1 CLIENT: NC Division of Waste Management
 CONTACT: Brian Polk PHONE NO: 919 270-3003
 PROJECT: Chrome East SITE/PWSID# :
 REPORTS TO: Brian Polk E-MAIL: brian.polk@ncdwm.net
 INVOICE TO: Linda Culpepper QUOTE #
 P.O. NUMBER Contract

SGS Reference: G443-515

PAGE 1 OF 1

LAB NO.	SAMPLE IDENTIFICATION	DATE	TIME	MATRIX	No CONTAINERS	SAMPLE TYPE C= COMP G= GRAB	Preservatives Used										REMARKS
							Analysis Required										
	<u>tab 1</u>	<u>7-3</u>		<u>soil</u>			<u>TCLP</u>										<u>All PCBs metals</u>
	<u>tab 2</u>	<u>7-3</u>		<u>soil</u>													
	<u>tab 3</u>	<u>7-3</u>		<u>soil</u>													

5 Collected/Relinquished By: (1) Brian Polk Date 7/13 Time
 Relinquished By: (2) Date Time Received By: [Signature] Date 7/18/08 Time 1010
 Relinquished By: (3) Date Time Received By: Date Time
 Relinquished By: (4) Date Time Received By: Date Time

4 Shipping Carrier: Samples Received Cold? (Circle) YES NO
 Shipping Ticket No: Temperature (C): 5.5°C
 Special Deliverable Requirements: Chain of Custody Seal: (Circle) INTACT BROKEN ABSENT
 Special Instructions:
 Requested Turnaround Time: RUSH STD
 Date Needed

N.C. CERTIFICATION #481

SGS ENVIRONMENTAL SERVICES, INC.

10 of 10



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

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

June 18, 2008

TOTAL
METAL
SCAN

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 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,

Brenda Pathammavong

brenda.pathammavong@pacelabs.com
Project Manager

Enclosures

REPORT OF LABORATORY ANALYSIS

Page 1 of 14

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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

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

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

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

REPORT OF LABORATORY ANALYSIS

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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

REPORT OF LABORATORY ANALYSIS

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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-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, TCLP		Analytical Method: EPA 6010 Preparation Method: 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	1	05/20/08 09:20	05/21/08 01:09	7439-96-5	
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	1	05/20/08 09:20	05/21/08 01:09	7631-86-9	
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	1	05/20/08 09:20	05/21/08 01:09	7440-23-5	
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	1	05/20/08 09:20	05/21/08 01:09	7440-28-0	
Tin	ND	mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-31-5	
Titanium	ND	mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-32-6	
Vanadium	ND	mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-62-2	
Zinc	0.078	mg/L	0.050	1	05/20/08 09:20	05/21/08 01:09	7440-66-6	

7470 Mercury, TCLP

Analytical Method: EPA 7470 Preparation Method: EPA 7470

Mercury	ND	ug/L	0.20	1	05/20/08 10:35	05/20/08 14:21	7439-97-6	
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Sample: **Blast Media - Total Run** Lab ID: **9219155002** Collected: 05/13/08 08:30 Received: 06/11/08 10:28 Matrix: Solid
Results reported on a "dry-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP		Analytical Method: EPA 6010 Preparation Method: EPA 3050						
Aluminum	7.2	mg/kg	5.4	1	06/16/08 16:05	06/17/08 11:51	7429-90-5	
Antimony	ND	mg/kg	0.27	1	06/16/08 16:05	06/17/08 11:51	7440-36-0	
Arsenic	ND	mg/kg	0.27	1	06/16/08 16:05	06/17/08 11:51	7440-38-2	
Barium	ND	mg/kg	0.27	1	06/16/08 16:05	06/17/08 11:51	7440-39-3	
Beryllium	ND	mg/kg	0.054	1	06/16/08 16:05	06/17/08 11:51	7440-41-7	
Boron	0.84	mg/kg	0.54	1	06/16/08 16:05	06/17/08 11:51	7440-42-8	

Date: 06/18/2008 10:10 AM

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

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

Sample: Blast Media - Total Run Lab ID: 9219155002 Collected: 05/13/08 08:30 Received: 06/11/08 10:28 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP		Analytical Method: EPA 6010 Preparation Method: EPA 3050						
Cadmium	ND	mg/kg	0.054	1	06/16/08 16:05	06/17/08 11:51	7440-43-9	
Calcium	59.2	mg/kg	5.4	1	06/16/08 16:05	06/17/08 11:51	7440-70-2	
Chromium	0.29	mg/kg	0.27	1	06/16/08 16:05	06/17/08 11:51	7440-47-3	
Cobalt	ND	mg/kg	0.27	1	06/16/08 16:05	06/17/08 11:51	7440-48-4	
Copper	ND	mg/kg	0.27	1	06/16/08 16:05	06/17/08 11:51	7440-50-8	
Iron	38.7	mg/kg	2.7	1	06/16/08 16:05	06/17/08 11:51	7439-89-6	
Lead	0.52	mg/kg	0.27	1	06/16/08 16:05	06/17/08 11:51	7439-92-1	
Magnesium	13.1	mg/kg	5.4	1	06/16/08 16:05	06/17/08 11:51	7439-95-4	
Manganese	0.61	mg/kg	0.27	1	06/16/08 16:05	06/17/08 11:51	7439-96-5	
Molybdenum	ND	mg/kg	0.27	1	06/16/08 16:05	06/17/08 11:51	7439-98-7	
Nickel	ND	mg/kg	0.27	1	06/16/08 16:05	06/17/08 11:51	7440-02-0	
Potassium	ND	mg/kg	269	1	06/16/08 16:05	06/17/08 11:51	7440-09-7	
Selenium	ND	mg/kg	0.54	1	06/16/08 16:05	06/17/08 11:51	7782-49-2	
Silica	77.8	mg/kg	1.1	1	06/16/08 16:05	06/17/08 11:51	7631-86-9	
Silicon	36.4	mg/kg	5.4	1	06/16/08 16:05	06/17/08 11:51	7440-21-3	
Silver	1.4	mg/kg	0.27	1	06/16/08 16:05	06/17/08 11:51	7440-22-4	
Sodium	ND	mg/kg	269	1	06/16/08 16:05	06/17/08 11:51	7440-23-5	
Strontium	ND	mg/kg	0.27	1	06/16/08 16:05	06/17/08 11:51	7440-24-6	
Thallium	ND	mg/kg	0.54	1	06/16/08 16:05	06/17/08 11:51	7440-28-0	
Tin	ND	mg/kg	2.7	1	06/16/08 16:05	06/17/08 11:51	7440-31-5	
Titanium	1.1	mg/kg	0.27	1	06/16/08 16:05	06/17/08 11:51	7440-32-6	
Vanadium	ND	mg/kg	0.27	1	06/16/08 16:05	06/17/08 11:51	7440-62-2	
Zinc	2.1	mg/kg	0.54	1	06/16/08 16:05	06/17/08 11:51	7440-66-6	
7471 Mercury		Analytical Method: EPA 7471 Preparation Method: EPA 7471						
Mercury	ND	mg/kg	0.0035	1	06/13/08 13:30	06/13/08 15:12	7439-97-6	H1
Percent Moisture		Analytical Method: ASTM D2974-87						
Percent Moisture	ND	%	0.10	1		06/12/08 16:18		

QUALITY CONTROL DATA

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

QC Batch: MERP/1482 Analysis Method: EPA 7470
QC Batch Method: EPA 7470 Analysis Description: 7470 Mercury TCLP
Associated Lab Samples: 9219155001

METHOD BLANK: 116517

Associated Lab Samples: 9219155001

Parameter	Units	Blank Result	Reporting Limit	Qualifiers
Mercury	ug/L	ND	0.20	

LABORATORY CONTROL SAMPLE: 116518

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	2.5	2.8	111	80-120	

MATRIX SPIKE SAMPLE: 116519

Parameter	Units	9219196002 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	ND	2.5	2.6	103	75-125	

SAMPLE DUPLICATE: 116520

Parameter	Units	9219448007 Result	Dup Result	RPD	Qualifiers
Mercury	ug/L	ND	.091J	94 R3	

QUALITY CONTROL DATA

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

QC Batch: MPRP/2371 Analysis Method: EPA 6010
QC Batch Method: EPA 3010 Analysis Description: 6010 MET TCLP
Associated Lab Samples: 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	

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: 116672

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	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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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	

QUALITY CONTROL DATA

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

QC Batch: PMST/1721 Analysis Method: ASTM D2974-87
QC Batch Method: ASTM D2974-87 Analysis Description: Dry Weight/Percent Moisture
Associated Lab Samples: 9219155002

SAMPLE DUPLICATE: 126983

Parameter	Units	9219155002 Result	Dup Result	RPD	Qualifiers
Percent Moisture	%	ND	ND	20	

QUALITY CONTROL DATA

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

QC Batch: MERP/1531 Analysis Method: EPA 7471
QC Batch Method: EPA 7471 Analysis Description: 7471 Mercury
Associated Lab Samples: 9219155002

METHOD BLANK: 126992

Associated Lab Samples: 9219155002

Parameter	Units	Blank Result	Reporting Limit	Qualifiers
Mercury	mg/kg	ND	0.0054	

LABORATORY CONTROL SAMPLE: 126993

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	.067	0.056	84	80-120	

MATRIX SPIKE SAMPLE: 126994

Parameter	Units	9219155002 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	ND	.069	0.065	94	75-125	H1

SAMPLE DUPLICATE: 126995

Parameter	Units	9221012001 Result	Dup Result	RPD	Qualifiers
Mercury	mg/kg	0.061	0.12	63	R1

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 Samples: 9219155002

METHOD BLANK: 128451
Associated Lab Samples: 9219155002

Parameter	Units	Blank Result	Reporting 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	

QUALITY CONTROL DATA

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

LABORATORY CONTROL SAMPLE: 128452

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% 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	
Titanium	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	311	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 R1	
Silver	mg/kg	1.4	16	18.0	103	75-125	

QUALITY CONTROL DATA

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

MATRIX SPIKE SAMPLE: 128453		9219155002	Spike	MS	MS	% Rec	
Parameter	Units	Result	Conc.	Result	% 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	Dup	RPD	Qualifiers
		Result	Result		
Aluminum	mg/kg	ND	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	
Vanadium	mg/kg	ND	ND	200	
Zinc	mg/kg	ND	.34J	33	

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.



CHAIN-OF-CUSTODY / Analytical Request Document

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

Page: of
1178467

Section A
Required Client Information:

Company: **Chrom East**
 Address: **321 Sign Dr. Concord, NC 28027**
 Email To:
 Phone: **704-789-8900**
 Requested Due Date/TAT:

Section B
Required Project Information:

Report To: **Jason Smith**
 Copy To:
 Purchase Order No.:
 Project Name:
 Project Number:

Section C
Invoice Information:

Attention:
 Company Name:
 Address:
 Pace Quote Reference:
 Pace Project Manager:
 Pace Profile #: **2295-1**

REGULATORY AGENCY
 NPDES GROUND WATER DRINKING WATER
 UST RCRA OTHER _____
 Site Location
 STATE: _____

ITEM #	Section D Required Client Information	SAMPLE ID (A-Z, 0-9 / -) Sample IDs MUST BE UNIQUE	Matrix Codes MATRIX / CODE	MIXTURE CODE (see valid codes to left)	SAMPLE TYPE (G=GRAB C=COMP)	COLLECTED				SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives							Analysis Test ↓ Analysis Test ↓ Metals (13) - Metal	Requested Analysis Filtered (Y/N)										Residual Chlorine (Y/N)	9219155 Pace Project No./ Lab I.D. 9219155001																							
						COMPOSITE START		COMPOSITE END/GRAB				Unpreserved	H ₂ SO ₄	HNO ₃	HCl	NaOH	Na ₂ S ₂ O ₃	Methanol		Other																																		
						DATE	TIME	DATE	TIME																																													
1		blast media						5/13/08	9:30																																													
2																																																						
3																																																						
4																																																						
5																																																						
6																																																						
7																																																						
8																																																						
9																																																						
10																																																						
11																																																						
12																																																						

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS		
	Andy L. L.	5/13/08	9:30	Kim Tran	5/13/08	9:30	NA	N	Y

ORIGINAL

SAMPLER NAME AND SIGNATURE

PRINT Name of SAMPLER:
 SIGNATURE of SAMPLER: _____

DATE Signed (MM/DD/YY): _____

Temp in °C: _____
 Received on Ice (Y/N): _____
 Custody Sealed Cooler (Y/N): _____
 Samples Intact (Y/N): _____



Sample Condition Upon Receipt

Client Name: Chrono East Project # 9219155

Courier: Fed Ex UPS USPS Client Commercial Pace Other _____

Custody Seal on Cooler/Box Present: yes no Seals intact: yes no

Packing Material: Bubble Wrap Bubble Bags None Other _____

Thermometer Used T060 Type of Ice: Wet Blue None Samples on ice, cooling process has begun

Cooler Temperature: NA Biological Tissue is Frozen: Yes No N/A
Temp should be above freezing to 6°C

Optional:
Proj. Due Date: N/A
Proj. Name: N/A

Date and Initials of person examining contents: KEF 5/13/08

Chain of Custody Present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	1.
Chain of Custody Filled Out:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	2.
Chain of Custody Relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	3.
Sampler Name & Signature on COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	4.
Samples Arrived within Hold Time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	5.
Short Hold Time Analysis (<72hr):	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	6.
Rush Turn Around Time Requested:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	7.
Sufficient Volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	8.
Correct Containers Used:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	9. <u>2iploc</u>
-Pace Containers Used:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Containers Intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	10.
Filtered volume received for Dissolved tests	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	11.
Sample Labels match COC:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	12. <u>no id on 2iploc</u>
-Includes date/time/ID/Analysis Matrix: <u>DT</u>		
All containers needing preservation have been checked.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	13.
All containers needing preservation are found to be in compliance with EPA recommendation.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
exceptions: VOA, coliform, TOC, O&G, WI-DRO (water)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Initial when completed
Samples checked for dechlorination:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	14.
Headspace in VOA Vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	15.
Trip Blank Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	16.
Trip Blank Custody Seals Present	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Pace Trip Blank Lot # (if purchased):	N/A	

Client Notification/ Resolution: _____ Field Data Required? Y / N / N/A
Person Contacted: _____ Date/Time: _____
Comments/ Resolution: _____

Project Manager Review: SP Date: 5/13/08

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)



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

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

May 29, 2008

TCLP
"DEGRAS"
RESULTS

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,

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

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

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

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

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 Kinsey Ave. Suite 100
Huntersville, NC 28078
(704)875-9092

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

REPORT OF LABORATORY ANALYSIS

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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-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, TCLP		Analytical Method: EPA 6010 Preparation Method: 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	1	05/20/08 09:20	05/21/08 01:09	7439-96-5	
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	1	05/20/08 09:20	05/21/08 01:09	7631-86-9	
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	1	05/20/08 09:20	05/21/08 01:09	7440-23-5	
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	1	05/20/08 09:20	05/21/08 01:09	7440-28-0	
Tin	ND	mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-31-5	
Titanium	ND	mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-32-6	
Vanadium	ND	mg/L	0.025	1	05/20/08 09:20	05/21/08 01:09	7440-62-2	
Zinc	0.078	mg/L	0.050	1	05/20/08 09:20	05/21/08 01:09	7440-66-6	
7470 Mercury, TCLP		Analytical Method: EPA 7470 Preparation Method: EPA 7470						
Mercury	ND	ug/L	0.20	1	05/20/08 10:35	05/20/08 14:21	7439-97-6	

QUALITY CONTROL DATA

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

QC Batch: MERP/1482 Analysis Method: EPA 7470
QC Batch Method: EPA 7470 Analysis Description: 7470 Mercury TCLP
Associated Lab Samples: 9219155001

METHOD BLANK: 116517
Associated Lab Samples: 9219155001

Parameter	Units	Blank Result	Reporting Limit	Qualifiers
Mercury	ug/L	ND	0.20	

LABORATORY CONTROL SAMPLE: 116518

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	2.5	2.8	111	80-120	

MATRIX SPIKE SAMPLE: 116519

Parameter	Units	9219196002 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	ND	2.5	2.6	103	75-125	

SAMPLE DUPLICATE: 116520

Parameter	Units	9219448007 Result	Dup Result	RPD	Qualifiers
Mercury	ug/L	ND	.091J	94 R3	

QUALITY CONTROL DATA

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

QC Batch: MPRP/2371 Analysis Method: EPA 6010
QC Batch Method: EPA 3010 Analysis Description: 6010 MET TCLP
Associated Lab Samples: 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	

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: 116672

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	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: 05/29/2008 12:54 PM

REPORT OF LABORATORY ANALYSIS

Page 6 of 8

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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	

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.



CHAIN-OF-CUSTODY / Analytical Request Document

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

Page: of
1178467

Section A Required Client Information:		Section B Required Project Information:		Section C Invoice Information:	
Company: <i>Chrom East</i>		Report To: <i>Jason Smith</i>		Attention:	
Address: <i>321 Sign Dr. Concord, NC 28027</i>		Copy To:		Company Name:	
Email To:		Purchase Order No.:		Address:	
Phone: <i>704-781-8900</i> Fax:		Project Name:		Pace Quote Reference:	
Requested Due Date/TAT:		Project Number:		Pace Project Manager:	
				Pace Profile #: <i>2295-1</i>	
				REGULATORY AGENCY	
				<input type="checkbox"/> NPDES <input type="checkbox"/> GROUND WATER <input type="checkbox"/> DRINKING WATER <input type="checkbox"/> UST <input type="checkbox"/> RCRA <input type="checkbox"/> OTHER _____	
				Site Location	
				STATE: _____	

ITEM #	Section D Required Client Information	Matrix Codes MATRIX / CODE	MATRIX CODE (see valid codes to left)	SAMPLE TYPE (G=GRAB C=COMP)	COLLECTED				SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives								Analysis Test ↓ Y/N ↓	Requested Analysis Filtered (Y/N)	Residual Chlorine (Y/N)	Pace Project No. / Lab I.D.			
					COMPOSITE START	COMPOSITE END/GRAB	Unpreserved	H ₂ SO ₄			HNO ₃	HCl	NaOH	Na ₂ S ₂ O ₃	Methanol	Other									
1	<i>blast media</i>				DATE	TIME	DATE	TIME																<i>9219155</i>	
2																									
3																									
4																									
5																									
6																									
7																									
8																									
9																									
10																									
11																									
12																									

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS				
	<i>Andy L...</i>	<i>5/13/08</i>	<i>9:30</i>	<i>Kim...</i>	<i>5/13/08</i>	<i>9:30</i>	NA	A	A	Y	I

ORIGINAL

SAMPLER NAME AND SIGNATURE		Temp in °C	Received on Ice (Y/N)	Custody Sealed Cooler (Y/N)	Samples Intact (Y/N)
PRINT Name of SAMPLER:					
SIGNATURE of SAMPLER:					
DATE Signed (MM/DD/YY):					

*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.



Sample Condition Upon Receipt

Client Name: Chrono East Project # 9219155

Courier: Fed Ex UPS USPS Client Commercial Pace Other _____

Custody Seal on Cooler/Box Present: yes no Seals intact: yes no

Optional:
Proj. Due Date: N/A
Proj. Name: N/A

Packing Material: Bubble Wrap Bubble Bags None Other _____

Thermometer Used T060 Type of Ice: Wet Blue None Samples on ice, cooling process has begun

Cooler Temperature: NA Biological Tissue is Frozen: Yes No N/A

Temp should be above freezing to 6°C Comments: Date and Initials of person examining contents: SAF 5/13/08

Chain of Custody Present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	1.
Chain of Custody Filled Out:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	2.
Chain of Custody Relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	3.
Sampler Name & Signature on COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	4.
Samples Arrived within Hold Time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	5.
Short Hold Time Analysis (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	6.
Rush Turn Around Time Requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	7.
Sufficient Volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	8.
Correct Containers Used:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	9. <u>2ipl^oc</u>
-Pace Containers Used:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Containers Intact:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	10.
Filtered volume received for Dissolved tests	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	11.
Sample Labels match COC:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	12. <u>no id on 2ipl^oc</u>
-Includes date/time/ID/Analysis Matrix:	<u>DT</u>	
All containers needing preservation have been checked.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	13.
All containers needing preservation are found to be in compliance with EPA recommendation.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
exceptions: VOA, coliform, TOC, O&G, WI-DRO (water)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Initial when completed
Samples checked for dechlorination:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	14.
Headspace in VOA Vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	15.
Trip Blank Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	16.
Trip Blank Custody Seals Present	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Pace Trip Blank Lot # (if purchased):	<u>N/A</u>	

Client Notification/ Resolution: _____ Field Data Required? Y / N / N/A

Person Contacted: _____ Date/Time: _____

Comments/ Resolution: _____

Project Manager Review: SAF Date: 5/13/08

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 category. 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 Kinsey 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

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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 Kinsey 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.

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Facility Name: CHROME EAST, INC City: CONCORD, NC

EVALUATION DATA New: Change: Delete:

Mo. Day Yr. Type:
Date: 04/04/07 C E I
Date: 06/20/07 C S E

Inspector ID #: 046 Reason:

Evaluation Comments:
SITE REFERRED FROM CITY OF CONCORD. IANOV ISSUED.
VIOLATIONS CORRECTED

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one)
- a SNC (SNY evaluation) Docket #
or
- no longer a SNC (SNN eval.)

YES / NO CSE ONLY

Waste Involved	Volume	Exposure Media (a, giv, siv, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells
0007, 0002 PLATING WASTE	275-GALLONS	POTENTIAL FOR ALL	< 200'	AT LEAST 6	NONE	UNK.

1 Type: Date Determined 04/04/07 Class:

Priority: Branch: 01 Person: 046

Return to Compliance 05/12/07 06/20/07
Scheduled *Actual*

Reg. Type: SR Reg. Description: ISA NCM ISA. 0109(a)

Comment:

2 Type: GPT Date Determined: 04/04/07 Class:

Priority: Branch: 01 Person: 046

Return to Compliance: 05/12/07 06/20/07
Scheduled *Actual*

Reg. Type: SR Reg. Description: 40 CFR 262.11

Comment:

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. **Purpose of Inspection:** 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. Reminders:

- 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.

 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



Sean

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.
- 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.

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

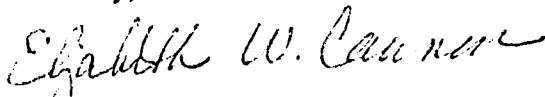
You must comply with each requirement of this Immediate Action Notice of Violation (IANOV); however, compliance will not divest the Section of its authority to issue an

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,

A handwritten signature in cursive script that reads "Elizabeth W. Cannon".

Elizabeth 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. **Survey Participants:** 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. **Purpose of Inspection:** 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. **Waste Type:**

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. **Reminders:**

- 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

Facility Name: CHROME EAST

Date: 6/20/07

Address: _____

Contact: _____

704-453-9432
704-784-8900

CONDUCTED FACILITY WALK THROUGH - ALL EQUIPMENT AND CHEMICALS HAVE BEEN REMOVED.

15,700 SQ FT

NEW BUILDING

* DECORATIVE CHROME

NCP 042 507 018

TRANSPORT:

HAZ-MAT TRANSPORT + DISPOSAL

- NCR 000 003 186

TSD:

DRTREX CORPORATION

- NCD 049 773 245

1-DR

WASTE CORR LIQUID (NITRIC ACID)

55-GALLONS - D002

WASTE CORR LIQUID (CHROME + WATER)

4-DR 220-GALLONS
D002 / D007



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

Waste Management and Remediation Administration
 Hazardous Waste Management
 Waste Management Section

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. Fees Requirements: 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		
TOTAL AMOUNT DUE			

C. Who is Required to Pay? 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.

- 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 thereof, 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.)
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704-375-7193

Please Refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resources Conservation and Recovery Act).	APPLICATION FOR PROVISIONAL ID NUMBER N. C. Department of Environment and Natural Resources Division of Waste Management Hazardous Waste Section 401 Oberlin Rd, Suite 150 Raleigh, NC 27605	For Official Use only
		Application Date
		Effective Date
		Expiration Date

I. INSTALLATION'S EPA ID NUMBER (Mark and "X" in the appropriate box)

A. First Notification
 B. Subsequent Notification
 Provisional EPA ID Number NC P042507018

II. GENERATOR (Include company and specific site name)

NAME: Chrome East, LLC SIC CODE NUMBER _____

III. LOCATION OF INSTALLATION (Physical address, NOT P. O. Box or Route Number)

Street : 788-D Central Drive
 City : CONCORD, NC Zip Code: 28027
 County : Cabarrus

Contact Name: (last) X Baumohl (first) X Chuck
 Contact Job Title: X VP Contact Phone 704-784-8900

Contact Address: 788-D Central Drive
CONCORD, N.C. 28027

IV. OWNERSHIP (Include the property owner. See instructions) *Property Owner, Church Street Partners LLC*

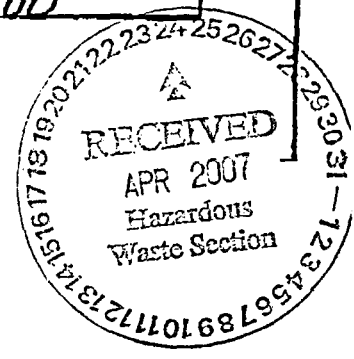
Name of Installation's Legal Owner: X Chrome East LLC by Charles Baumohl VP Member
 Mailing Address: X 788-D Central Dr
Concord, NC 28027

Phone Number: X 704-784-8400 Land Type Owner Type

V. TRANSPORTER

Company Name: HAZ-MAT Transportation & Disposal EPA ID: NCR000003186
 Mailing Address: P.O. Box 37392 - 221 Dalton Ave.
Charlotte, N.C. 28237

Contact Name: Cliff Workman Phone Number: 704-332-5600



VI. DISPOSER

Company Name: Haz. Matt EPA ID: NCR000003186
 Mailing Address: P.O. Box 37391
Charlotte, NC 28237
 Contact Name: Cliff Workman Phone Number: 704 332-5600
704 363 0296

VII. DESCRIPTION OF HAZARDOUS WASTE(S)

Check all that apply
 1. Ignitable 2. Corrosive 3. Reactive 4. Toxicity

List any additional specific EPA Hazardous Waste Numbers:
DO02

Number of Gallons 990 or Pounds _____ or Kilograms _____ to be disposed.

Name of this substance Nitric Acid - Nickel Rinse

How was this hazardous waste generated? Chrome Plating

What other wastes (hazardous or non-hazardous) do you generate? NO

Have you generated hazardous waste in the past? Yes

Will you generate hazardous waste in the future? Yes

VIII. CERTIFICATION

I certify that the information supplied is accurate and correct to the best of my knowledge and belief, and that this is a one-time handling of any kind of hazardous waste. I do not and will not generate any hazardous waste of any quantity.
 I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment.

X Charles A. Baumh VP Member X 4/23/07
 Signature Date Signed

Charles A. Baumh Vice President/Member
 Name and Official Title (type or print)



North Carolina Department of Environment and Natural Resources

James R. Melton, Director

Division of Waste Management

Michael F. Easley, Governor
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

North Carolina Department of Environment and Natural Resources
Hazardous Waste Section
1646 Mail Service Center
Raleigh, NC 27699-1646
phone: 919-508-8400

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

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D. Verify Contact Information, make correction(s) and sign: (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, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties 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 & E-mail Address	

E. Hazardous Waste Contact:

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?

- Rules, Regulations and the General Statutes at the NC Hazardous Waste Rules web page:
<http://www.wastenotnc.org/HWHOME/WEBRules/NCHWRule.html>
- 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:

- Hazardous Waste Requirements for Large Quantity Generators (EPA: 530-F-96-032):
<http://www.epa.gov/epaoswer/hazwaste/gener/lqgpdf.pdf>
- Compliance Manual for Generators of Hazardous Waste (Compliance Branch, Hazardous Waste Section):
<http://www.wastenotnc.org/hwhome/LQGCOMPLIANCEMANUAL.pdf>
- 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

Facility Name: CHROME EAST

Date: 4/12/07

Address: _____

(204) 784-8900

(704) 784-8918 -FAX

Contact: JASON SMITH
CHUCK BAUMHL

* GOING TO MOVE TO NEW FACILITY. NO
PLATING ~~ALLOWED~~ ALLOWED AT THIS
LOCATION.

* GOING TO OBTAIN PROVIS. #.
PRINTED & PROVIS. APPLIC. AT TIME OF INSPECTION.

* GOING TO SHIP AT LEAST (6) CONTAINERS OF
WASTE. CURRENTLY LOOKING AT PRICES.

* WILL CONDUCT A FINAL WALK THROUGH.

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 Holyfield <Doug.Holyfield@NCmail.net>

WSRO

NC DENR

Sean Morris wrote:

Inspection Notes

Facility Name: CHROME EAST

Date: 4/4/07

Address: 788(D) CENTRAL DR.
CONCORD, NC 28027

Contact: JASON SMITH
CHUCK BAUMOHL

1028 LEE-ANN PR. NE
SUITE 215
CONCORD 28025
CHURCH STREET PARTNERS
POWER PARTNERS
WHITKAL
TIM ARBY
704-782-6800

* FACILITY BEEN IN OPERATION FOR 18 MONTHS

4 CONTAINERS 55-GALLON MURATIC ACID. UNUSED.
CAVIT USE

(6) CONTAINERS 55-GALLONS
• 4 - FOOD SLUDGE
• 2 - CHROME SLIP
• 1-1/2 30-GALLON WASTE
FROM FIRE WASTE NICKEL

* DECOUPLER 6-EMPLOYEE
CHROME

CYANIDE FOR COPPER PLATING.

* SMALL MOTOR CYCLE PARTS MOTOR
STEEL + ALUM PARTS

* RIMS + RUMBER
SENT TO CA
FOR PLATING.

* ELECTRIC CONTROLLER BOX STARTED FIRE IN SUNDAY.

EVALUATE TANK ID TAG SECONDARY CONTAIN SYSTEM.

* PAINT STRIPPER NEEDS TO BE MOVED AWAY
FROM OTHER PLATING CHEMICALS

* POWER HAS BEEN OFF SINCE ~~REPAIR~~ FIRE.
HEARING ON JUNE 19 - ZONING ISSUE MAY
CLOSE BUSINESS. ASKING FOR VARIANCE.

* ALARM SYSTEM - SPRINKLER

STOP BY FOR FOLLOW-UP

788(D) - PLATING
(C) - STORAGE
PROB.

SUBMITTED TO J. EDWARDS
VIA EMAIL ON 4/4/07



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

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
Site address

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: 2/2/07 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 MANAGEMENT
704-920-5528
980-521-0126

Complaint Description: _____
* FIRE AT LOCATION, SPILLS OCCURED IN BUILDING DURING FIRE.
NO MATERIAL LEFT ANY SECONDARY CONTAINMENT AREA.
FACILITY APPEARS TO BE WELL RUN. SOME INDICATION
THAT FACILITY MAY HAVE FINANCIAL PROBLEMS.
OWNER
MR. SELLS NOTED 55-GALLON CONTAINERS BUT THE
OWNER INDICATED NO WASTE WAS ON SITE.

(Use Back if Needed)

Directions to Facility or Property:

Referrals:

NC DWQ-Aquifer Protection _____
NC DWQ-Surface Water Protection _____
NC DAQ _____
Solid Waste Section _____
EPA _____
County Agency _____
Other _____

610 East Center Avenue, Suite 301
 Mooresville, North Carolina 28115
 Telephone: 704-663-1699
 Fax: 704-663-6040

DENR
Mooresville Regional Office

Fax

To: JIM SELLS From: S. MORRIS
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