



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

MAR 05 2020

Mr. Jake Cline
Director of Daily Operations
C&R Plating, Inc.
1120 East 10th Street
Minneapolis, Kansas 67467

RE: C&R Plating, Inc.
Minneapolis, Kansas
RCRA ID No.: KSR000504803

Dear Mr. Cline:

On October 1, 2019, the U.S. Environmental Protection Agency filed a Consent Agreement and Final Order to resolve C&R Plating's violations of the Resource Conservation and Recovery Act. The CAFO required C&R Plating to submit a final compliance report, which was received by the EPA on January 30, 2020.

The EPA has reviewed the final compliance report and determined that it is adequate. However, the EPA offers the following information for your consideration, with no response required:

- Attachment F – Spin line waste – This waste is now hard-piped to the wastewater treatment system. The waste is hazardous for chromium (D007) but may not be F006 listed hazardous waste depending on how it is currently generated. C&R Plating should review and update this waste determination and should consider including a detailed description of how the waste is generated if it is determined not to be F006 listed hazardous waste.
- As was explained throughout the pre-filing process, hazardous chemicals determined to be unusable cannot be treated through the wastewater treatment system. This system is for wastewater management and is not designed as a treatment system for hazardous wastes. Additionally, while hazardous chemicals may be liquid, that does not necessarily mean the hazardous chemicals are wastewater.

Your facility is responsible for maintaining compliance with all applicable hazardous waste regulations. I encourage you to contact the Kansas Department of Health and Environment at 785-296-1600 to obtain a copy of its hazardous waste regulations or to ask any questions you may have regarding the regulations. If you have any questions regarding this letter, please contact Rebecca Wenner, of my staff, at 913-551-7644 or by email at wenner.rebecca@epa.gov.

Sincerely,



for David Cozad
Director
Enforcement and Compliance Assurance Division

cc: Ken Powell, Chief, Compliance and Enforcement, Waste Reduction, and Assistance
Section, KDHE
Ken.Powell@ks.gov
Kansas Department of Health and Environment North Central District Office