



Weston Solutions, Inc.
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December 5, 2019

Craig Gigglesman
Valeriy Bizyayev
On-Scene Coordinator
United States Environmental Protection Agency, Region VIII
Mail Code: 8SEM-EMR
1595 Wynkoop Street
Denver, CO 80202

Re: Black Hills Plating – Letter Report
Rapid City, Pennington County, South Dakota
TDD: 0001/1909-01
DCN: W0731.1A.02145
WO#: 20408.012.001.0731.00

Dear Mr. Gigglesman

The United States Environmental Protection Agency (U.S. EPA) tasked the Weston Solutions, Inc., (WESTON[®]) Superfund Technical Assessment and Response Team (START) under Technical Direction Document (TDD) 0001/1909-01 to support U.S. EPA's emergency response at the Black Hills Plating site (the Site) in Rapid City, Pennington County, South Dakota (Attachment A, Figure 1). The emergency response was initiated to determine whether a threat to human health and the environment existed due to unknown waste chemicals on the Site.

SITE DESCRIPTION

The Site (44.136706 °North, -103.132784°West) is located at a garage approximately 6 miles from the town of Rapid City, Pennington County, South Dakota. The site is approximately 2.5 acres of residential and commercial land, and is surrounded by commercial, agricultural, and residential use lands (Figure 2). Items of concern inventoried during the walk-through included containers, drums, and bath tanks. These items were found stored in the garage (Attachment B, Photo Log).

BACKGROUND

EPA tasked START to perform an assessment of waste chemicals being stored on the residential property from a former metal plating business, Black Hills Plating and Polishing, LLC. The business previously operated out of 7481 Stagestop Rd., Black Hawk, SD and went out of business in approximately 2014 according to South Dakota Department of Environment and Natural Resources (DENR) staff. The business owner moved the waste chemicals, plating equipment, and process tanks to an unheated garage on a residential property (Attachment A). This document was prepared by Weston Solutions, Inc., expressly for U.S. EPA. It shall not be released or disclosed in whole or in part without the express, written permission of U.S. EPA.



Mr. Giggelman
U.S. EPA

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Black Hills Plating
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During a site visit in August of 2017 by DENR a partial inventory of the waste chemicals were conducted. The following chemicals were identified during this site visit:

- -Drums with Nickel and Cyanide-Copper bath waste;
- -Drums with Chromium bath waste;
- -Drums with Acid Copper bath waste;
- -Several, 5- to 30-gallon drums (polyethylene or steel); and
- -30-gal drum containing sodium cyanide product.

EMERGENCY RESPONSE ACTIVITIES

On September 17, 2019, U.S. EPA On-Scene Coordinators Valeriy Bizyayev and Craig Giggelman, and START members Joe Rudi and Michael Cherny mobilized to the site to perform an assessment of the Site. The assessment included air monitoring for hazardous gases and vapors, and an inventory of the number and condition of chemicals and containers on-site. Photos can be found in the Photo Log (Attachment B).

Air monitoring activities were performed by START staff for volatile organic compounds (VOCs), carbon monoxide (CO), hydrogen sulfide (H₂S), lower explosive limit (LEL), oxygen (O₂), and hydrogen cyanide (HCN). Air monitoring results indicated no concentrations of hazardous gasses or vapors exceeding background concentrations or above any established action levels. LEL and O₂ concentrations were within ranges for safe entry into the building with Level D personal protective equipment (PPE).

START conducted an inventory of waste chemical containers on-site, 70 containers ranging in various sizes (1/2 gallon to 450 gallon) were documented and inventoried. General conditions indicated most containers were in stable condition, but signs of leaking and etching of the concrete floor indicated leaks from containers had been occurring. Drums were mislabeled with hand written labels and stored in haphazardous conditions. Photo documentation may be found in Attachment B, showing initial disposition of containers and drums in the garage. Additional inventory and label information may be found in Table 1 (Attachment C).

START sampled all unknown chemical containers in level B PPE except one container, labeled as Sodium Cyanide, because the drum was believed to be in the original container and appropriately labeled. Table 1 (Attachment C) shows the results of the samples from the Hazard Classification testing performed by START.

DISPOSAL ACTIVITIES



Mr. Giggelman
U.S. EPA

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Black Hills Plating
December 5, 2019

On September 19, 2019, U.S. EPA On-Scene Coordinators Valeriy Bizyayev, Craig Giggelman, START members Joe Rudi, Michael Cherny, and the Emergency and Rapid Response Services (ERRS) contractor began to perform container and drum stabilization.

START conducted further hazard classification, container compatibility testing, and documentation of stabilization activities. All containers smaller than 55 gallons were grouped per the Department of Transportation (DOT) hazard classification and placed in DOT approved over-packs (Attachment B). Drums in poor or compromised condition were over-packed into 95 gallon poly drums. Further information on overpacks and containers can be found in Table 1 (Attachment C).

The drums and over-packs were removed from the garage and moved to a staging area located on the property. Photos can be found in Attachment B.

START demobilized from the site on September 20, 2019. On September 21, 2019 EPA ERRS contractor began scraping the bath tanks and containerizing bath wastes.

All overpacked drums were secured in the staging area until a disposal contract was able to be secured.

EPA and EPA ERRS contractor remobilized to the Site on October 21, 2019 for final transportation and disposal of the waste chemicals. All the over-packs and drums were loaded and removed from the Site by October 22, 2019. Photos may be found in Attachment B.



Mr. Giggelman
U.S. EPA

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Black Hills Plating
December 5, 2019

CONCLUSIONS

As a result of the site activities an estimate of the number and contents of potential hazardous materials removed from Black Hills Plating has been generated, and the overall condition of the site has been documented.

This Letter Report will be the final TDD deliverable, per the request of On-Scene Coordinator Giggelman. If there are any questions or comments regarding this report, please do not hesitate to contact me at joe.rudi@westonsolutions.com or 303-729-6191.

Very truly yours,

WESTON SOLUTIONS, INC.

A handwritten signature in blue ink, appearing to read "Joe Rudi", is positioned above the printed name.

Joe Rudi
START Project Leader



Mr. Giggelman
U.S. EPA

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Black Hills Plating
December 5, 2019

Attachment:

- A – Figures
- B – Photo Log
- C – Tables

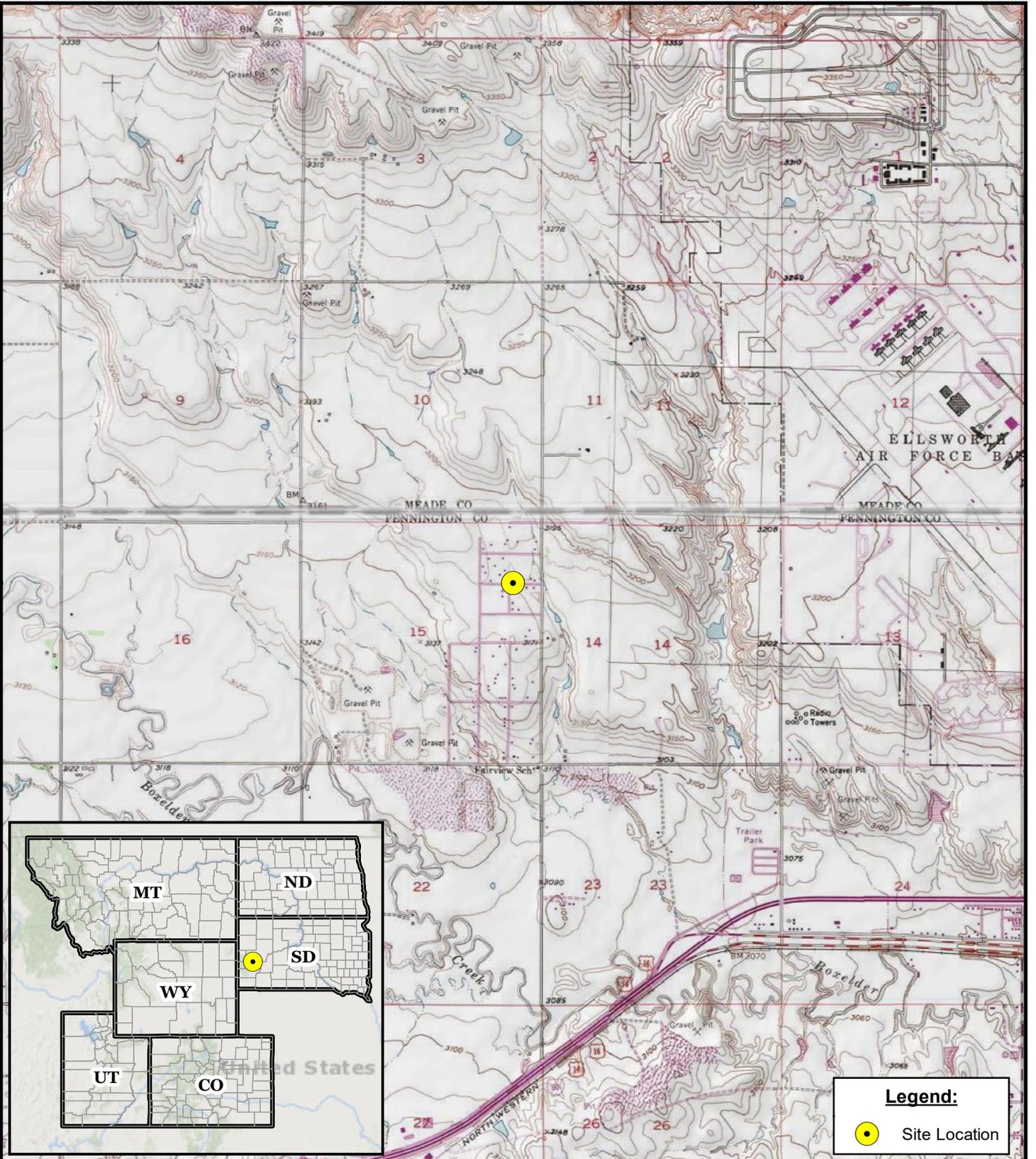
cc: Robert Reed, Project Manager
START DCN File



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Attachment A

Figures



Legend:

 Site Location

Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere
 Projection: Mercator Auxiliary Sphere
 Datum: WGS 1984

Source:
 Background: ESRI USA Topo Maps (2019)



Prepared for:
U.S. EPA - Region 8



Contract: EP-S8-13-01
 TO/TDD: 0001/1909-01

Prepared By:
Weston Solutions, Inc.
 START IV
 Suite 100
 1435 Garrison St.
 Lakewood, CO



**FIGURE 1
 SITE LOCATION MAP
 BLACK HILLS PLATING
 RAPID CITY, PENNINGTON COUNTY,
 SOUTH DAKOTA**

Date: 9/17/2019

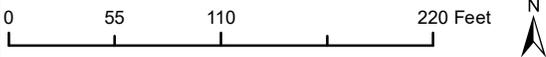


Legend:

 Site Area

Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere
Projection: Mercator Auxiliary Sphere
Datum: WGS 1984

Source:
Background: ESRI World Imagery (2019)



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**FIGURE 2
SITE VICINITY MAP
BLACK HILLS PLATING
RAPID CITY, PENNINGTON COUNTY,
SOUTH DAKOTA**

Date: 9/24/2019



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Attachment B

Photo Log

Project Name: Black Hills Plating	Site Location: 44.136706 °North, -103.132784°West	TDD No. 0001-1909-01
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Photo No. 1	Date: 9/17/19
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Direction Photo Taken: East

Description: Initial view of the containers.
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Photo No. 2	Date: 9/17/19
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Direction Photo Taken: Down

Description: View of the sodium cyanide. This container was not sampled due to the contents.
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Project Name:
Black Hills Plating

Site Location: 44.136706 °North,
-103.132784°West

TDD No.
0001-1909-01

Photo No.
3

Date:
9/17/19

Direction Photo Taken:

Down

Description:

View of various containers packed in the garage.



Photo No.
4

Date:
9/17/19

Direction Photo Taken:

West

Description:

View of the smaller containers.



Project Name: Black Hills Plating	Site Location: 44.136706 °North, -103.132784°West	TDD No. 0001-1909-01
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Photo No. 5	Date: 9/18/19
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Direction Photo Taken:

East

Description:

Sampling drums in Level B PPE.



Photo No. 6	Date: 9/18/19
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Direction Photo Taken:

East

Description:

Sampling drums in Level B PPE. Various substances observed and sampled



Project Name: Black Hills Plating	Site Location: 44.136706 °North, -103.132784°West	TDD No. 0001-1909-01
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Photo No. 7	Date: 9/18/19
Direction Photo Taken: East	

Description:

View of two of the bath tanks after the drums and small containers were removed.



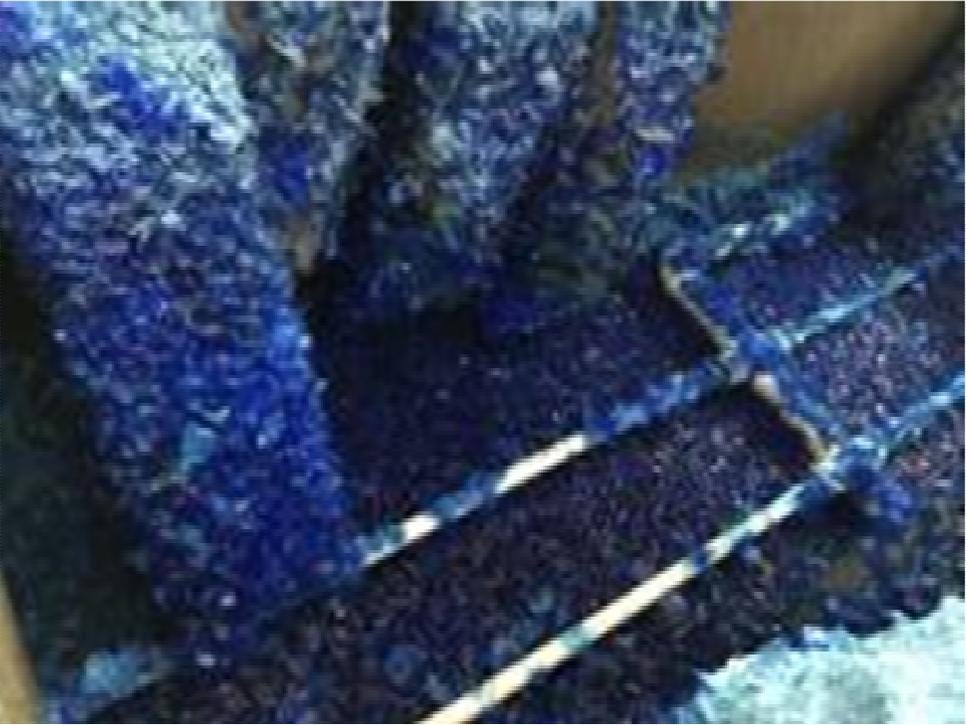
Photo No. 8	Date: 9/18/19
Direction Photo Taken: Down	

Description:

Performing Hazardous Class activities.



Project Name: Black Hills Plating		Site Location: 44.136706 °North, -103.132784°West	TDD No. 0001-1909-01
Photo No. 9	Date: 9/19/19		
Direction Photo Taken: West			
Description: Over packing drums that could not be sealed properly.			

Photo No. 10	Date: 9/20/19	
Direction Photo Taken: Down		
Description: View of the acid copper chemical bath.		

Project Name: Black Hills Plating	Site Location: 44.136706 °North, -103.132784°West	TDD No. 0001-1909-01
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Photo No. 11	Date: 9/20/19
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Direction Photo Taken:

East

Description:

View of the initial staging of the over packs and drums.



Photo No. 12	Date: 9/21/19
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Direction Photo Taken:

Down

Description:

View of a chemical bath being scraped.



Project Name: Black Hills Plating		Site Location: 44.136706 °North, -103.132784°West	TDD No. 0001-1909-01
Photo No. 13	Date: 9/21/19		
Direction Photo Taken: Down			
Description: General view of a chemical bath including coils.			

Photo No. 14	Date: 9/21/19		
Direction Photo Taken: Down			
Description: ERRs loading the chemical bath coils into over packs.			

Project Name: Black Hills Plating		Site Location: 44.136706 °North, -103.132784°West	TDD No. 0001-1909-01
Photo No. 15	Date: 9/21/19		
Direction Photo Taken: Down			
Description: View of a chemical bath being scraped.			

Photo No. 16	Date: 10/7/19	
Direction Photo Taken: Down		
Description: Visible staining in borehole number seven.		

Project Name: Black Hills Plating	Site Location: 44.136706 °North, -103.132784°West	TDD No. 0001-1909-01
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Photo No. 17	Date: 10/22/19
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Direction Photo Taken:

North

Description:

ERRs Loading the over packs and drums.



Photo No. 18	Date: 10/22/19
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Direction Photo Taken:

Down

Description:

Final view of the garage after the removal.





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Attachment C

Tables

Table 1
Black Hills Plating
Chemical Inventory

Container ID	Container Label	Chemical Name	UN #	container Size	Container Material	Physical State	Volume	Color	Comments	PH	HazClass ID	Lab Pack	Proposed Waste Codes
BHP-01	E-Kleen - 173	Sodium Hydroxide - Solid	UN-1823	15 Gallon	fiberglass drum	Solid-Powder	1/4 Full	White		11.5	9	OV-09	D002
BHP-02	Ano Strip	Ammonium Hydroxide	UN-2672	15 Gallon	Poly	Liquid	1/4 Full	Clear		12	9	OV-10	D002
BHP-03	En-Prep 725D	Sodium Hydroxide - Solid	UN-1823	15 Gallon	fiberglass drum	Solid-Powder	3/4 Full	Black	"Corrosive"	8	9	OV-08	D002
BHP-04	Ano-Strip	Sodium Hydroxide - Solid	UN-1823	15 Gallon	Poly	Solid-Chips	1/2 Full	White		14	8B	OV-02	D002
BHP-05	No Label	Sodium Hydroxide - Solid	UN-1823	1 Gallon	Poly	Liquid	3/4 Full	Clear		1	8A	OV-03	D002
BHP-06	En-Prep 725D	Sodium Hydroxide - Solid	UN-1823	15 Gallon	fiberglass drum	Solid-powder	1/2 Full	Green	"Nickel carbonate"	10	5.1B	OV-01	D002
BHP-07	Agate Lacquer	Xylene, Butyl Alcohol, MEK, 2 Butyl Octyl Ethanol, Glycol Ethethyl EB, Isopropanol		5 Gallon	Poly	Liquid	1/2 Full	Translucent Green	"Clear Coat"	10	9	OV-08	Non Haz
BHP-08	Bright Nickel Make Up			5 Gallon	Poly	Liquid	Full	White		3	9	OV-07	D002
BHP-09	Ano-Strip	Sodium Hydroxide - Solid	UN-1823	2 Gallon	Poly	Solid-Chips	3/4 Full	White		14	8B	OV-02	D002
BHP-10	Iron Control Additive			5 Gallon	Poly	Liquid	1/4 Full	Amber		7	9	OV-06	Non Haz
BHP-11	Zodiac ZD-220			5 Gallon	Poly	Liquid	Full	Clear		5	9	OV-06	Non Haz
BHP-12	Bright Nickel Adjuster			5 Gallon	Poly	Liquid	1/4 Full	Clear		4	9	OV-06	Non Haz
BHP-13	Econo-Chrome-300	Chromium Trioxide Anhydrous	UN-1463	7 Gallon	Steel	Solid-Chips	1/2 Full	Red/Black	"Toxic Corrosive Oxidizer"	1	5.2A	OV-05	D002
BHP-14	Cluflex 311			5 Gallon	Poly	Liquid	Full	Clear		3	9	OV-06	D002
BHP-15	Barium Carbonate			7 Gallon	fiberglass drum	Solid-powder	1/4 Full	White		8	9	OV-08	D005
BHP-16	Bright Nickel Make Up			5 Gallon	Poly	Liquid	Full	Green		4	9	OV-07	Non Haz
BHP-17	Muriatic Acid	Hydrochloric Acid		1 Gallon	Poly	Liquid	3/4 Full	Clear		0	8A	OV-06	D002
BHP-18	No Label			1/2 Gallon	Poly	Liquid	Full	Clear	"Do not freeze"	2	8A	OV-03	D002
BHP-19	Bright Nickel Additive	# E3 Grain Refiner		1 Gallon	Poly	Liquid	1/4 Full	Clear		5	9	OV-06	Non Haz
BHP-20	Electro Strip	Sulfuric Acid Solution	UN-1830	5 Gallon	Poly	Liquid	Full	Clear		0	8A	OV-04	D002
BHP-21	Ano Add			1 Gallon	Poly	Liquid	3/4 Full	Clear	"Fume Suppressant Catalyst"	2	8A	OV-03	D002
BHP-22	ENE Brown Dip	Hydrochloric Acid, Selenous Acid		1 Gallon	Poly	Liquid	3/4 Full	Clear		5	5.1A	OV-11	D002
BHP-23	Ano Add			1 Gallon	Poly	Liquid	Full	Clear	"Fume Suppressant Catalyst"	2	8A	OV-03	D002
BHP-24	No Label	Boric Acid		5 Gallon	Poly	Solid-Powder	3/4 Full	White	"Menards"	3	9	OV-05	D002
BHP-25	Bright Nickel Make Up			5 Gallon	Poly	Liquid	Full	Green		4	9	OV-07	Non Haz
BHP-26	Electro Strip	Sulfuric Acid Solution	UN-1830	5 Gallon	Poly	Liquid	Full	Clear	eats paper	0	8A	OV-04	D002
BHP-27	Econo-Chrome-300-BK Catalyst	Potassium Nitrate		5 Gallon	Poly	Liquid	1/2 Full	Clear	"strong Oxidizer"	4	5.1A	OV-11	D002
BHP-28	Electro Strip	Sulfuric Acid Solution	UN-1830	5 Gallon	Poly	Liquid	Full	Clear		0	8A	OV-04	D002
BHP-29	Electro Strip	Sulfuric Acid Solution	UN-1830	5 Gallon	Poly	Liquid	Full	Clear		0	8A	OV-04	D002
BHP-30	Etox P5	Sodium Hydroxide - Solid	UN-1823	2 Gallon	Poly	Solid-Powder	3/4 Full	White		14	8B	OV-02	D002
BHP-31	HCK-843		UN-2922	1 Gallon	Poly	Liquid	3/4 Full	Red	"toxic Corrosive"	1	5.2A	OV-05	D002
BHP-32	Infinity 200 Air Wetter	Chromium Trioxide, Magnesium Fluoro Silicate	UN-2922	5 Gallon	Poly	Liquid	1/2 Full	Clear	Bubbles like Soap	6	9	OV-07	Non Haz
BHP-33	A-5/ZD-100			5 Gallon	Poly	Liquid	1/4 Full	Clear		5	9	OV-06	Non Haz
BHP-34	E-Kleen - 173	Sodium Hydroxide - Solid	UN-1823	15 Gallon	fiberglass drum	Solid	1/2 Full	Yellow/White		12	9	OV-09	D002
BHP-35	No Label	Sulfuric Acid 66 be	UN-1830	20 Gallon	Poly	Liquid	1/2 Full	Clear	"Corrosive"	0	8A	OV-03	D002
BHP-36	CY Copper			55 Gallon	Poly	Liquid	Full	Orange	"Duct Tape Label"	12	6B		F007
BHP-38	CY Copper			55 Gallon	Poly	Liquid	Full	Orange	"Duct Tape Label"	12	6B		F007
BHP-38	DuPont Cyanogran	Sodium Cyanide	UN-1689	20 Gallon	Steel	Solid	Full	unknown	"toxic"	--	--	OV-12	P106
BHP-40	CY Copper			55 Gallon	Poly	Liquid	Full	Orange	"Duct Tape Label"	12	6B		F007
BHP-50	CY Copper			55 Gallon	Poly	Liquid	Full	Orange	"Duct Tape Label"	12	6B		F007
BHP-54	CY Copper			55 Gallon	Poly	Liquid	Full	Clear	"Duct Tape Label"	12	6B		F007
BHP-59	CY Brass			55 Gallon	Poly	Liquid	Full	Clear	"Duct Tape Label"	12	6B		F007
BHP-43	Diox Chlor Max	Sodium Hypochlorite	UN-1791	20 Gallon	Steel	Solid	Full	Clear		14	5.1B	OV-01	D002
BHP-41	No Label			55 Gallon	Steel	Solid	Full	Green		10	5.1B	OV-13	F008
BHP-42	No Label			55 Gallon	Steel	Solid	Full	Dark Amber		4	5.2A	OV-14	F008
BHP-68	--	--	--	95 Gallon	Poly	Solid	Full	Red/brown/Blue	Overpack of tank contents.	1/3	5.2A		F008
BHP-98	--	--	--	55 Gallon	Poly	Solid	Full	Yellow/White/Gray	Contents from T-BHP-66 and T-BHP-67	12	6B		F008
BHP-99	--	--	--	55 Gallon	Poly	Solid	Full	Yellow/White/Gray	Contents from T-BHP-66 and T-BHP-67	12	6B		F008
OV-43	--	--	--	95 Gallon	Poly	Solid	Full	Yellow/White/Gray	Corroded, crystal laden, metal coils from Cyanide tank (T-BHP-66 & T-BHP-67)	12	6B		F008
BHP-36	AC Copper			55 Gallon	Poly	Liquid	3/4 Full	Blue		0	5.1A		D002
BHP-37	Chrome			55 Gallon	Poly	Liquid	1/4 Full	Dark Amber		3	5.2A	OV-37	D002
BHP-39	Nickel			55 Gallon	Poly	Liquid	3/4 Full	Green	"Duct Tape Label"	6	9	OV-11	Non Haz
BHP-40	AC Copper			55 Gallon	Poly	Liquid	Full	Blue	"Duct Tape Label"	1	5.1A		D002
BHP-44	AC Copper			55 Gallon	Poly	Liquid	Full	Blue	"Duct Tape Label"	0	5.1A	OV-15	D002
BHP-46	Chrome			55 Gallon	Poly	Liquid	Full	Dark Amber	"Duct Tape Label"	3	5.2A		D002
BHP-47	Chrome			55 Gallon	Poly	Liquid	Full	Dark Amber	"Duct Tape Label"	3	5.2A		D002
BHP-51	Chrome			55 Gallon	Poly	Liquid	Full	Dark Amber	"Duct Tape Label"	3	5.2A	OV-16	D002
BHP-52	AC Copper			55 Gallon	Poly	Liquid	Full	Blue	"Duct Tape Label"	0	5.1A		D002
BHP-53	AC Copper			55 Gallon	Poly	Liquid	Full	Blue	"Duct Tape Label"	0	5.1A		D002
BHP-55	Nickel			55 Gallon	Poly	Liquid	Full	Green	"Duct Tape Label"	6	9		Non Haz
BHP-56	Nickel			55 Gallon	Poly	Liquid	Full	Green	"Duct Tape Label"	6	9		Non Haz
BHP-57	Nickel			55 Gallon	Poly	Liquid	Full	Green	"Duct Tape Label"	6	9		Non Haz
BHP-63	Electro Strip Additive			1 Gallon	Poly	Liquid	1/4 Full	Clear		5	9	OV-03	Non Haz
BHP-64	--	Nickel Sulfate Hexahydrate		50 lbs	Bag	Solid	3/4 Full	Blue		4	9	OV-06	Non Haz
BHP-65	--	Barium Carbonate		50 lbs	Bag	Solid	Full	White		--	--	OV-08	D005
BHP-58	Nickel			55 Gallon	Poly	Liquid	Full	Green	"Duct Tape Label"	3	9		Non Haz
BHP-70	--	--	--	95 Gallon	Poly	Solid	Full	Green	Overpack of Nickel Tank.	6	9		Non Haz
BHP-57	--	--	--	55 Gallon	Poly	Solid	Full	Various	Copper Mixed waste on rubber lines cut into sections from T-BHP-69	1/3	5.2A		D002
BHP-60	No Label			55 Gallon	Poly	Liquid	Full	Green	Possible Nickel	6	9		Non Haz
BHP-61	Chrome			55 Gallon	Poly	Liquid	Full	Dark Amber	"Duct Tape Label"	3	5.2A	OV-18	D002
OV-39	--	--	--	95 Gallon	Poly	Solid	Full	Red/brown/Blue	Copper and chrome tank mixed waste (T-BHP-68 & T-BHP-69)	1/3	5.2A		D002
OV-40	--	--	--	95 Gallon	Poly	Solid	Full	Green	Nickel tank mixed waste (T-BHP-70)	6	9		Non Haz
OV-41	--	--	--	95 Gallon	Poly	Solid	Full	Red/brown/Blue	Copper and chrome tank mixed waste (T-BHP-68 & T-BHP-69)	1/3	5.2A		D002
OV-42	--	--	--	95 Gallon	Poly	Solid	Full	Red/brown/Blue	Copper and chrome tank mixed waste (T-BHP-68 & T-BHP-69)	1/3	5.2A		D002
BHP-62	Chrome			55 Gallon	Poly	Liquid	Full	Dark Amber	"Duct Tape Label"	3	5.2A		D002
OV-44	--	--	--	95 Gallon	Poly	Solid	Full	Green	Nickel tank mixed waste (T-BHP-70)	6	9		Non Haz
OV-45	--	--	--	95 Gallon	Poly	Solid	Full	Red/Brown/Blue	Copper and chrome tank mixed waste (T-BHP-68 & T-BHP-69)	1/3	5.2A		D002
OV-46	--	--	--	95 Gallon	Poly	Solid	Full	Red/Brown/Blue	Copper and chrome tank mixed waste (liners) (T-BHP-68 & T-BHP-69)	1/3	5.2A		D002
TANKS													
T-BHP-66	--	--	--	200 Gallon	Metal	Sludge	3%	Gray	Bath	12	6B	Bath	Recycle
T-BHP-67	--	--	--	450 Gallon	Metal	Solid	0.03	Yellow/white	Bath	12	6B	Bath	Recycle
T-BHP-68	--	--	--	450 Gallon	Metal	Solid	3%	Red/brown	Bath	3	5.2A	Bath	Recycle
T-BHP-69	--	--	--	450 Gallon	Metal	Solid	0.04	Blue	Bath	1	5.2A	Bath	Recycle
T-BHP-70	--	--	--	450 Gallon	Metal	Solid	1%	Green	Bath	6	9	Bath	Recycle