

Ecology and Environment, Inc.
13722 Shoreline Court East, St. Louis, Missouri 63045

Limited Potentially Responsible Party (PRP) Search

R and O Processors, Inc.
Granby, Missouri

Environmental Protection Agency
Technical Assistance at
Hazardous Waste Sites
TAT VII
TDD No. T07-9105-005

Paul Doherty
U.S. EPA Region VII
Deputy Project Officer

May 6, 1991

30491120



Superfund

TABLE OF CONTENT

1.0 INTRODUCTION

1.1	Project Background.....	1.1
1.2	Scope of Work.....	1.2

2.0 SITE HISTORY..... 2.1

3.0 PROPERTY HISTORY

3.1	Introduction and Property Description.....	3.1
3.2	Chain of Ownership.....	3.1
3.3	Summary of Owners and Operators.....	3.1

4.0 POTENTIALLY RESPONSIBLE PARTIES

4.1	Robert W. Moffet.....	4.1
4.2	R and O Processors.....	4.1
4.3	Others.....	4.1

5.0 PRP FINANCIAL INFORMATION

5.1	Robert W. Moffet.....	5.1
5.2	P and O Processors.....	5.2

LIST OF FIGURES

1. Site Location Map
2. Site Location Map-Aerial
3. Plat Map-Property Description

LIST OF ATTACHMENTS

- A. Ecology and Environment, Inc. Report
- B. MDNR 1988 Investigation Report
- C. Limited Title Search for R and O Processors
- D. Deed: Bessy A. Lovelady
TO
Robert W. Moffet
- E. Deed: Robert W. Moffet
TO
R and O Processors
- F. Article of Incorporation
- G. Dunn and Bradstreet Report
- H. Listing of Federal Regulation Violations
- I. Joint Voluntary Petition Through MDNR



ecology and environment, inc.

CLOVERLEAF BUILDING 3, 6405 METCALF, OVERLAND PARK, KANSAS 66202. TEL. 913/432-9961

International Specialists in the Environment

MEMORANDUM

TO: Paul Doherty, EPA/DPO

FROM: Kathleen Wright, E & E/TATM

THRU: Joe Chandler, E & E/TATM *JCC*

DATE: May 28, 1991

SUBJECT: R & O Processors Limited PRP Search Report
Granby, Missouri
TDD#: T07-9105-005
PAN#: EM00944VAA
OSC: Bob Wiggans

1.0 INTRODUCTION

1.1 Project Background

This report presents the results of the Limited Potentially Responsible Party (PRP) search conducted for the R and O Processors site in Granby, Missouri. This PRP search was conducted to support EPA oversight of the site investigation.

R and O Processors, Inc. was a metal finishing business that performed various plating processes, including processes using cyanide. Cyanide facilitated the plating of brass and copper on steel. Processes not using cyanide were mainly zinc, chromium, nickel, and black oxide plating on steel and anodizing of aluminum. According to a Missouri Department of Natural Resources inspection report, tin plating was also done in the past and wastes from this process are still on site. Waste generated from all of these processes include spent stripping solutions bearing cyanide and metals, spent acids and caustics, and rinse solutions.

Spent solutions were either stored in outdoor concrete vats or recycled. MDNR has inspected the vats and the recycling system. According to MDNR, the vats show signs of leakage and the recycling system has been inoperative since approximately October 1987.

The original Articles of Incorporation list two owners; Robert Moffet and Orval K. Taylor, Jr. Although documentation is lacking, ownership has apparently changed and Robert W. Moffet is the sole proprietor. R and O Processors has been in operation at the P.O. Box 351, West Highway 60 site (Figure 1) since 1981.

The facility has a history of compliance discrepancies with MDNR, as described in section 2.0 of this report. Operations were shut down (1990, exact date unknown) due to financial deficiencies. The owners reportedly are planning to file for personal and business bankruptcy.

1.2 Scope of Work

The Ecology and Environment, Inc., (E & E) Technical Assistance Team (TAT) received a Technical Direction Document (TDD# T07-9105-005) to perform a PRP search for R and O Processors. Specific elements for the PRP search included reviews of E & E's Preliminary Removal Assessment Report and MDNR's files, a deed search, and an assessment of the financial capabilities of the identified PRPs. These elements were accomplished through the completion of four basic tasks.

TASK 1: Research Sources of Information

Completion of this task includes the written report from E & E in Attachment A, information from MDNR site investigations in Attachment B, and the Joint Voluntary Petition from MDNR in Attachment I.

TASK 2: Conduct a Title Search

The title search in Attachment C was completed under a subcontract to Newton County Abstract and Title Company of Neosho, Missouri. The chain of ownership, derived from the title search, is presented in 3.0, with the deeds of property in Attachments D and E.

TASK 3: Develop Basic PRP Information

For individuals who were identified as PRP's, basic information, including current addresses and relationship to the facility, was obtained through the Certificate of Incorporation (Attachment F). This information is presented in section 4.0.

TASK 4: Develop PRP Financial Information

For individuals who were identified as PRP's, types and amounts of real estate assets were identified through the Granby County Assessor's office and through the Dunn and Bradstreet Report provided in Attachment G.

2.0 SITE HISTORY

R and O Processors, Inc. was incorporated in Missouri on September 17, 1973. The original location of the facility was Main and Church Street, Granby, Missouri. The two shareholders listed on the original incorporation document (Attachment F) are:

Robert W. Moffet
Orval K. Taylor, Jr.

In 1981, R and O Processors, Inc. relocated. It purchased parcel 8.02 out of Section 10, Township 25, and Range 31 from Robert W. Moffet (Figure 3). During the same year, R and O Processors built a new facility on parcel 8.02. The new address was P.O. Box 351, West Highway 60, Granby, Missouri.

On or about June 27, 1985, MDNR personnel responded to a request for assistance involving the possible release of hazardous materials at the R and O Processors Main and Church Streets address, an abandoned business location. Subsequently, on November 26, 1985, a RCRA inspection of the facility revealed several violations including storage of hazardous waste without an interim status permit and allowing cyanide-contaminated wastewater, a listed hazardous waste, to overflow from outside holding tanks onto the ground. A Notice of Violation was issued immediately. On May 27, 1986, an Abatement Order was issued by MDNR to the company and on December 10, 1986, an amendment to the original Abatement Order was issued. Neither the Order nor the Amendment was appealed; however, the company has taken no action to correct the violations cited therein. On March 27, 1987, an inspection of the new facility was performed and the company was again found to be in violation. The matter was referred to the Office of the Missouri Attorney General for legal action. By letter sent on September 23, 1987, the Attorney General advised the company that numerous violations (at the new facility on West Highway 60), including failure to comply with the Abatement Order and the Amendment (1985-86), had been noted. On October 4, 1988, the operating facility was again inspected by MDNR personnel. The inspection results were transmitted to R and O Processors by letter dated November 18, 1988. The inspection disclosed both new and continuing violations, as listed in Attachment H. The company was further advised that the State of Missouri was prepared to file suit against R and O Processors, Inc., but that the state would be willing to negotiate an amicable settlement. Subsequent to the receipt of this notice, the parties engaged in settlement negotiations, which culminated in the terms and conditions set forth in the Settlement Agreement (Attachment I).

The agreement was set up to help implement a schedule to correct the violations of the Missouri Hazardous Waste Law and Regulations occurring at R and O Processors. Although Robert W. Moffet consented and signed the settlement agreement, he has done nothing to effect the agreement.

On January 15, 1991, TAT was tasked by the U.S. Environmental Protection Agency Emergency Planning and Response (EPA/EP&R) Branch to conduct a removal assessment, and to document site conditions, collect and arrange for analysis of samples as necessary to determine, if a need for removal action existed, and to complete a general inventory of hazardous materials at the site (Attachment A). Samples of waste liquids, sludge, soil, and ground water were analyzed for total metals and cyanide. The samples indicated that the site conditions present a threat to public health and the environment.

3.0 PROPERTY HISTORY

3.1 Introduction and Property Description

The R and O Processors, Inc. facility is located at Section 10, Township 25, and Range 31 (Figure 3), described as beginning at the southeast corner of said northeast quarter of the northwest quarter, thence north 300 feet, thence west 180 feet, thence south 300 feet, thence east 180 feet to the point of beginning. The facility also has an easement to access Highway 60 (Attachment C).

Property identification was identified by a title search (Attachment C) and by the Deeds of Property (Attachments D and E).

3.2 Chain of Ownership

In August 1972, Bessy A Lovelady sold Parcel 8, Section 10, Township 25, and Range 31 to Robert W. Moffet and Pauline Moffet, husband and wife. On August 19, 1981, Robert W. Moffet and Pauline Moffet sold Parcel 8.02, Section 10, Township 25, and Range 31 (the property described in section 3.1) to R and O Processors. The remaining property of Parcel 8, Section 10, Township 25, and Range 25 continues to be in the names of Robert W. and Pauline Moffet.

3.3 Summary of Ownership and Operators

PARCEL 8: Bessy A. Lovelady ?--1972
(Attachment D)

PARCEL 8: Robert W. Moffet and 1972--present
(Attachment D) Pauline Moffet, husband and wife.

PARCEL 8
SUB-SECTION 02: Robert W. Moffet and Pauline Moffet
sub-divided their property (Attachment E) and R and O Processors
purchased sub-section 02 in 1981.

R and O Processors is the only owner of the property on which the facility was built and operated (Attachment C).

4.0 POTENTIALLY RESPONSIBLE PARTIES

4.1 Robert W. Moffet

Robert W. Moffet is identified as a Potentially Responsible Party (PRP) as current operator of the facility. He is listed as the sole owner of the company (Attachment F).

4.2 R and O Processors

R and O Processors is identified as a Potentially Responsible Party (PRP) as current property owner (Attachment C).

4.3 Others

Orval K. Taylor, Jr., as past co-owner of the facility, may also be a PRP. Other PRPs may exist (e.g. transporters and disposers of site generated hazardous waste) but due to the limited scope of this task information on Mr. Taylor or other PRPs was not pursued.

5.0 PRP FINANCIAL INFORMATION

5.1 Information was sought from the Newton County Assessor's office and the Dunn and Bradstreet Report concerning the assets of the individuals identified as PRPs.

Robert W. Moffet

Property Description: Commercial Property
Block 11
lots 7,8,9, and N 1/4 of lot 10
Address: Main and Church Street, Granby, Missouri
Value: Assessed \$910.00
Appraised \$2,850.00

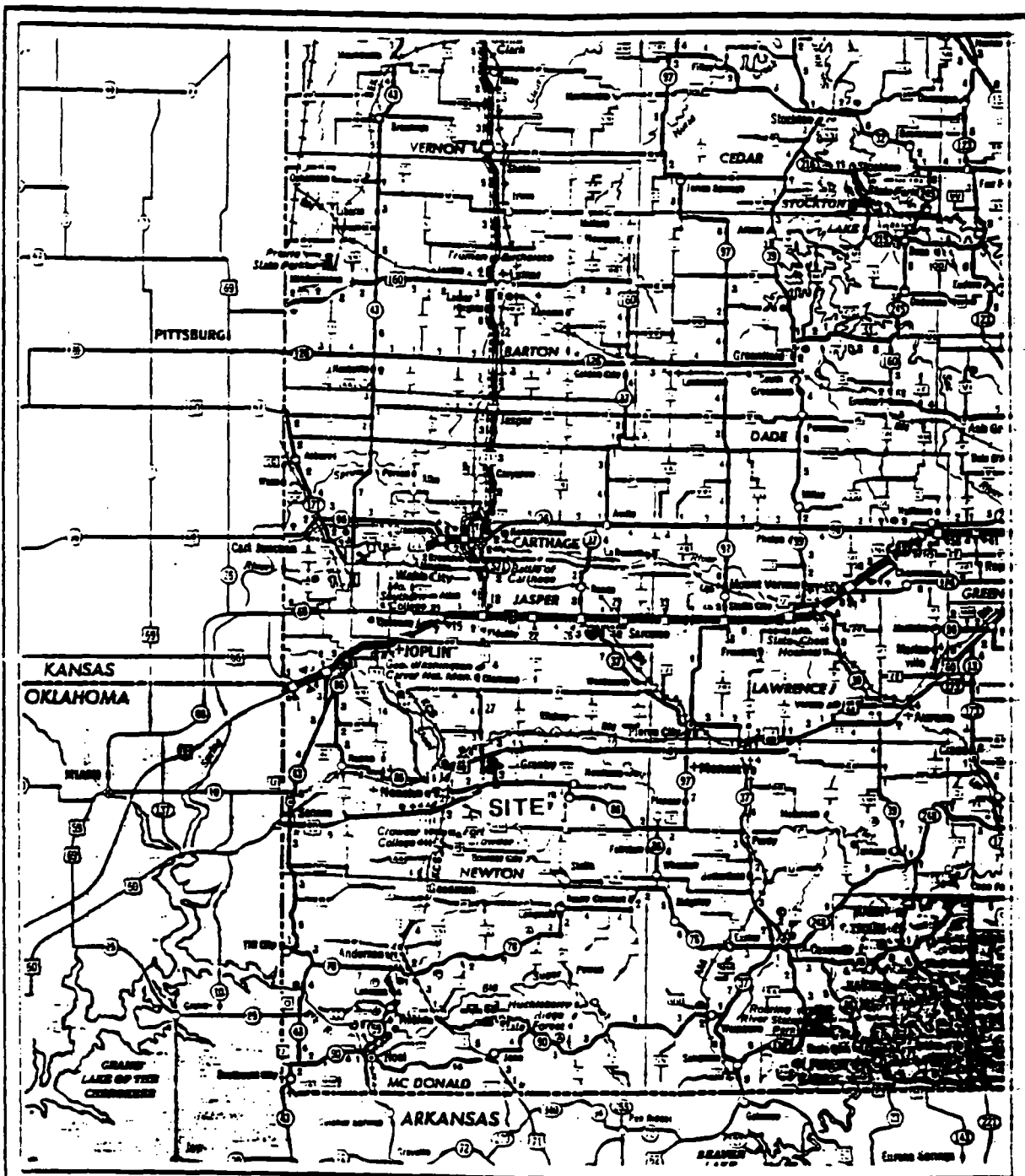
Property Description: Residential Property
Parcel 8
Section 10
Township 25
Range 31
Address: Box 351, W. Highway 60, Granby, Missouri
Value: Assessed \$4,740.00
Appraised \$24,970.00

5.2 R and O Processors

Property Description: Commercial Property
Parcel 8 Sub-section 02
Section 10
Township 25
Range 31
Address: Box 351, W. Highway 60, Granby, Missouri
Value: Assessed: \$35,720.00
Appraised: \$111,630.00

According to the Dunn and Bradstreet Report, as of June 20, 1990, the following information is the "Balance Sheet" for R and O Processors.

CASH	\$1,000.00
ACCTS REC	\$20,000.00
MDSE	\$7,500.00
FIXED ASSETS	\$160,000.00
ACCTS PAY	\$8,000.00
NOTES PAY	\$48,000.00



R and O Processors, Inc.

FIGURE 1



R and O Processors, Inc.

FIGURE 2

ATTACHMENT A
Ecology and Environment, Inc. Report

To: Paul Doherty, EPA/DPO
From: David Kinroth, E & E/TAT
Thru: Joe Chandler, E & E/TATL
Date: April 15, 1991
Subject: Preliminary Removal Assessment - R & O Processors Hwy 60
Facility, Granby, Missouri
TDD: T07-9012-030
FAN: EMO0944SAA
OSC: Bob Wiggans

INTRODUCTION

The Ecology & Environment Technical Assistance Team (E & E/TAT) was tasked by the United States Environmental Protection Agency Emergency Planning and Response Branch (EPA/EP&R) to conduct a removal assessment at the R & O Processors Hwy 60 facility about three miles west of the city of Granby, Missouri. Background information concerning this site was obtained from the Missouri Department of Natural Resources (MDNR) and a health and safety plan was produced prior to the initiation of site work. Site activity included the assessment and documentation of site conditions, the collection and arrangement for analysis of samples as necessary to determine whether there existed a need for removal action, and a general inventory of hazardous materials at the site. Samples of waste liquid and sludge, soil, and groundwater were analyzed for total metals and cyanide. The results showed levels of some inorganics in the soil and groundwater samples which indicate that the site conditions present a threat to public health and the environment.

BACKGROUND

The R & O Processors, Inc. Hwy 60 facility is located about three miles west of the city of Granby, Missouri, and less than a mile from the intersection of Highway Alternate 71 and 60 on Highway 60 in Newton County. The site can be reached by traveling south on Alternate 71 from I-44 to Highway 60, then traveling east on 60 to the site (Attachment A). The facility is on the south side of the highway. The building is light green with dark green trim and is visible from the highway. The site owner, Mr. Robert Moffet, lives on the site in a house just west of the facility. This is a rural area with a few other residences (<20) in the immediate area. These residences receive their water supply from private wells.

R & O Processors, Inc. was a metal finishing business that performed various plating processes, including processes using cyanide. Cyanide processes included brass and copper plating on steel. Processes not using cyanide included zinc, chromium, nickel, and black oxide plating on steel and anodizing of aluminum. According to an MDNR

inspection report (October, 1988) tin plating has also been done in the past and wastes from this are still on site. Waste generated from these processes included spent stripping solutions bearing cyanide and metals, spent acids and caustics, and rinse solutions.

Storage of spent solutions was done in an outdoor concrete vat at the south end of the building that is divided into three 20'x10'x4' compartments. The west and center vats stored spent acids and rinses from noncyanide processes and the east vat stored cyanide bearing fluids that were treated with sodium hypochlorite. The partition walls creating the compartments have gaps between them and the south outer wall; therefore all three compartments are interconnected. In October, 1988, an MDNR inspection revealed two leaks in the south outer wall and the soil was saturated next to the tanks on a dry day. At that time it was noted that no waste shipment had been made since the previous 1987 MDNR inspection and that the vat levels had decreased six to seven inches (~2000 gallon decrease). The vats were open to precipitation so this loss could not be attributed to evaporation and it was suspected that a large quantity of liquid had leaked from the vats.

A well outside the north end of the facility was used as a water source for the make up of the solutions. In the past, much of the spent solution was recycled. The spent solutions were drained from the process tanks into channels in the floor that ran to a collection sump in the waste treatment room. At the time of the last MDNR inspection this sump was full of sludge and any liquid entering it was overflowing directly into the outside storage vats. The recycling process involved pH adjustment with sulfuric acid or caustic soda, addition of a flocculating agent, and settling in a 5000 gallon tank. The liquid was then decanted in a 10,000 gallon reclaimed water storage tank. The sludge bottoms were centrifuged and the resulting water also decanted in the reclaimed water tank. The solids were to be drummed and shipped as a RCRA waste (F006). According to the MDNR report this system has not operated since about October, 1987. This report is included as Attachment B.

The owners of the facility had previously signed a consent agreement with MDNR that would have accomplished a corrective action at the facility, but the required work has not been completed. The owners now feel they are financially incapable of completing the work. Their attorney has indicated that the owners are planning to file personal and business bankruptcy. No further work on the part of the owners is anticipated at this site.

SITE ACTIVITY

On January 15, 1991, David Kinroth and Hieu Vu (E & E/TAT) met with Mr. Moffet on site. The facility was monitored with a Foxboro 128 organic vapor analyzer, an HCN monitox, and a Miniram particle monitor prior to a tour of the building led by Mr. Moffet. No readings above background levels were noted. The building was open to outside air and most of the liquids in the tanks were frozen at that time.

During the tour Mr. Moffet informed TAT of what each of the

tanks contained or was used for and the tanks were labeled with markers. A sketch of the facility was later produced and is included as Attachment C. Mr. Moffet informed TAT that no solvents to speak of were used on site in the 19 years of operation other than those in a small parts cleaner. This was in agreement with results from samples collected previously by MDNR that showed no notable levels of volatile organic compounds in the wastes on site. There was an estimated 30,000 gallons of liquid on site in the waste storage vats and process tanks and over 12,000 gallons of sludge.

The entire facility was very disorderly. Most of the tanks in the process lines were corroded and several were leaking. The pH of these solutions ranged from less than one to greater than twelve. Drums of sludge, caustic material, waste liquids, and product (acids, caustic solids, etc.) were stored throughout the facility as well as outside the facility. Incompatible materials such as acids and NaCN were stored in close proximity to each other. An unsuccessful attempt to plug the leaks in the outside storage tanks with fiberglass patching material had been made and leakage continued from the east compartment. There was no vegetation present in the drainage pathway from the area of the leak south of the building for approximately 100 feet. This drainage pathway was observed to eventually run into a ditch that flowed east from the site. Mr. Moffet said that this ditch probably eventually flowed into Shoal Creek. Plywood covers had also been constructed in an attempt to cover the compartments from precipitation however these were not effective.

Following the site tour, TAT collected a sample of well water from the Moffet residence well for total metals and cyanide analysis. According to Mr. Moffet this well is about 230 feet deep and probably from the same water table as the well north of the facility that had been used to make up the plating solutions. The well volume was calculated, the average flow rate from the tap was determined, and the well was purged for fifteen minutes to provide greater than three purge volumes in accordance with the SOP for sampling residential wells. TAT then tried to contact several residents north of the site in an attempt to collect a background well water sample. A suitable well could not be located at that time. TAT then left site to find a motel and refine the site sketch and plans for further sample collection.

On the following morning, January 16, 1991, TAT returned to the site to complete the sampling effort. Following the completion of sample collection on site, the site conditions were photodocumented. The photographic record is presented as Attachment D. TAT then left site to collect a background well water sample from a residence about one-half mile north of the site. This sample was also collected in accordance with the SOP for sampling of residential wells. A background soil sample was also collected from a wooded area northeast of the intersection of Highway 60 and Alternate 71. Table 1 summarizes all samples collected during this assessment effort. Refer to the site sketch for on site sample locations. All liquid samples were collected in cubitainers and solid samples in eight ounce jars. Liquid samples were preserved with HNO_3 for metals analysis and NaOH for cyanide analysis except on the samples from the cyanide rinse tank and the

H₂SO₄ tank, due to their extreme pH levels. Standard field documentation, including sample tags, field sheets, and chain-of-custody procedures were followed. Samples were then packed on ice in a cooler and shipped to GP Environmental Services in Gaithersburg, Maryland, for analysis.

TABLE 1

Sample #	Medium	Location	pH	Analyses
NVX01001	water	Moffet residence well	--	total metals, CN
NVX01002	water	background well	--	" " "
NVX01003	water	composite, waste vats	9	" " "
NVX01004	sludge	center waste vat	--	" " "
NVX01005	water	cyanide rinse tank	12	" " "
NVX01006	water	waste treatment sump	11	" " "
NVX01007	sludge	waste treatment sump	--	" " "
NVX01008	water	H ₂ SO ₄ tank, black oxide	<1	total metals, BNA
NVX01009	water	duplicate NVX01003	9	total metals, CN
NVX01010	soil	by waste vat leakage	--	" " "
NVX01011	soil	background soil	--	" " "

THREAT

Sample results were received following review of the data by the TAT Analytical Services Group. The package received is presented as Attachment E. The results from the two process tanks sampled, the cyanide rinse tank in the copper/brass line (NVX01005) and the sulfuric acid tank in the black oxide line (NVX01008), show that process fluids remaining in the tanks on site range from pH>12 with high levels of cyanide and metals to pH<1 with high metal levels. The BNA results from the sulfuric acid tank sample indicated the presence of several acid-extractable semivolatile organic compounds at low levels, however the sample could not be adjusted to pH>11 due to the nature of the sample so no base/neutral analysis could be performed. Table 2 presents an overview of the levels of contaminants of concern present in the waste liquid and sludge samples, the soil sample near the leak from the waste storage vat, and the background soil sample.

TABLE 2

	<u>Waste Storage Vat</u>		<u>Waste Treatment Sump</u>		<u>Soil</u>	
	liquid NVXO1003	sludge NVXO1004	liquid NVXO1006	sludge NVXO1007	near leak NVXO1010	background NVXO1011
CN	31000	60	58000	23000	7.1	ND
Cd	440	24000	3900	200	690	2.4
Cr	3200	9800	2200	3800	490	19
Cu	9300	11000	16000	13000	8200	34
Ni	3700	190000	2000	17000	15000	13
Zn	1600	55000	4400	42000	16000	110

units for liquids ug/L

units for solids mg/Kg

Cyanide was not present at detectable levels in either the on-site or the background well water samples. Several metals were present at levels of concern in the well water sample collected from the Moffet residence that were not present at detectable levels in the background sample. These metal levels are compared against regulatory levels in Table 3 which were obtained from the EPA Office of Drinking Water document "Drinking Water Regulations and Health Advisories", dated April, 1990. According to OSWER directive 9360.1-01, "Interim Guidance on Removal Action Levels at Contaminated Drinking Water Sites", the action level for non-volatile, non-carcinogens, like cadmium and chromium, equals the Drinking Water Equivalent Level (DWEL).

TABLE 3

<u>Metal</u>	<u>Estimated Value</u>	<u>Regulatory Level</u>
Cadmium	14,000 ug/L	20 ug/L DWEL ¹
Chromium	5,800 ug/L	200 ug/L DWEL
Copper	6,500 ug/L	1300 ug/L MCL ²
Zinc	32,000 ug/L	5 mg/L SMCL ³

1. Drinking Water Equivalent Level.
2. Maximum Contaminant Level.
3. Secondary Maximum Contaminant Level.

The health effects of cadmium include the biochemical replacement of zinc in enzymes etc., high blood pressure, kidney damage, the destruction of testicular tissue and red blood cells, and toxicity to aquatic organisms. Chromium is an essential trace element, however hexavalent chromium is a possible carcinogen. While copper and zinc

are also essential trace elements and are not believed to pose significant health threats to humans, both are toxic to plant life at high levels. The possibility of synergistic/antagonistic relationships exists when metals are present in combination (Manahan, 1984).

Threats to the environment from this site include surface contamination and potential groundwater contamination. The drainage pathway from the leakage of the waste storage vat flows south toward a ditch. As mentioned before, the drainage area is lacking vegetation probably due to surface contamination. Soil samples collected by MDNR from the southeast property corner showed cyanide and high levels of metals, confirming that surface contamination had spread at least that far (see attachment B). From examination of the USGS 7.5 minute topographic quadrangle map of Granby, Missouri, it appears that the drainage ditch at the south property boundary runs east for approximately one mile before joining with Dry Branch Creek, which eventually flows into Shoal Creek to the north. Additional sampling around the drainage pathway south of the waste storage vats and in the drainage ditch would be required to fully delineate the extent of contaminant migration.

Because of the karst topography features in this region, which provides little natural filtration of contaminants as surface water quickly percolates through the ground, the surface contamination on site places the groundwater quality at risk. Contamination has been indicated by the results from the well water sample collected from the residence on site. Other residential wells in the area may also be at risk and sampling of these wells would be required to delineate the extent of groundwater contamination. Mining activity in this region will have to be considered in the evaluation of metal levels in these samples.

A threat also exists on this site due to the storage of incompatible materials in close proximity to each other which promotes the possibility of the release of toxic vapors. There are no fences surrounding the site and the building is open on two sides permitting unrestricted access to the building. This could place the local population at risk, especially any children that might live in the area.

Evaluation Of The Potential For A Removal Action

Any removal action must be done in accordance with 40 CFR 300.415 Subsection (b)(2) which lists factors to be considered in determining the appropriateness of a removal action. Cadmium and chromium were detected in the groundwater sample collected on site at orders of magnitude greater than the respective 20 ug/L and 200 ug/L DWEL levels, and high levels of copper and zinc were also detected. In addition to these factors, the site conditions meet criteria listed in 40 CFR 300.415 Subsection (b)(2) as follows:

- (i) Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or foodchain;

(ii) Actual or potential contamination of drinking water supplies or sensitive ecosystems;

(iii) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

(iv) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.

(v) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released...

Recommendations

The conditions existing at the R & O Processors - Hwy 60 facility indicate that a removal recommendation is warranted. Cadmium and chromium were detected in the groundwater sample collected on site at orders of magnitude greater than their respective action levels. High levels of copper and zinc were also detected in the groundwater. These metals were not present in detectable levels in the background sample collected. Contaminated soil also exists on site. Additional sampling of soil, creek sediment, and groundwater would be necessary to fully delineate the extent of contaminant migration and the scope of a removal action fully determined. Initial actions should address the leaking waste storage vat to mitigate the release of the contaminated liquid. The liquids remaining in the process tanks will have to be hazard categorized prior to bulking to determine any incompatibilities.

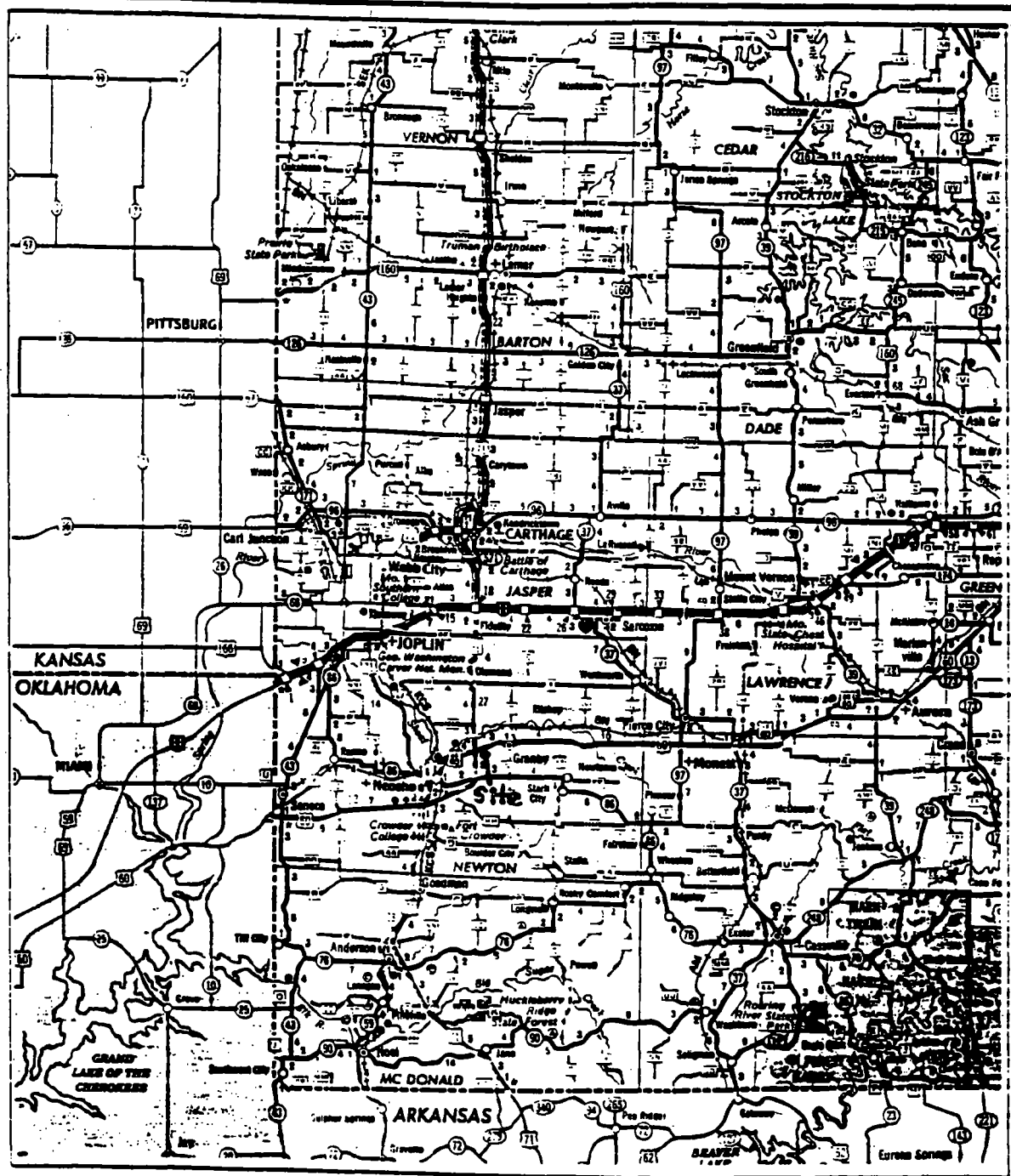
On site treatment options may be feasible and could reduce costs of shipping and disposal of hazardous waste. A treatment process for the destruction of cyanide in water has already been demonstrated to be cost effective at another site. Bench tests to determine the cost effectiveness of the treatment of sludge contaminated with cyanide and metals could begin before removal actions are initiated at this site.

References

- Alderson, Larry. 1988. Report of Sampling Investigation - R & O Processors, Inc. Unpublished report - Missouri Dept. of Nat. Res.
- Judge, Thomas. 1988. Hazardous Waste Compliance Inspection Report - R & O Processors, Inc. Unpublished report - Missouri Dept. of Nat. Res.
- Manahan, Stanley E. 1984. Environmental Chemistry. PWS Publishers. Boston, Ma. 612 pp.

Attachments

- A) Site Location Map
- B) MDNR Hazardous Waste Compliance/Sampling Investigation Reports
- C) Facility Sketch
- D) Photographic Record
- E) Sample Results



R & O PROCESSORS - HWY 60 FACILITY

GRANBY, MISSOURI
TDD#: T07-9012-030
PAN#: EMO0944SAA

ATTACHMENT B
MDNR 1988 Investigation Report

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176
Jefferson City, MO 65102

Division of Energy
Division of Environmental Quality
Division of Geology and Land Sur.
Division of Management Services
Division of Parks, Recreation
and Historic Preservation

December 6, 1990

Mr. Paul Doherty, Chief
Site Investigation Section
U. S. Environmental Protection
Agency, Laboratory
25 Funston Road
Kansas City, KS 66101

WVX 51

RE: Potential Removal Action, R&O Processors

Dear Mr. Doherty:

Enclosed please find a copy of the Waste Management Program's file on R&O Processors, Granby, Missouri. This facility is actually located about three miles west of the City of Granby on Highway 60, and is a newer location of the same business within the City of Granby. The owners had previously signed a consent agreement with the Department of Natural Resources that would have accomplished a corrective action at the facility. However, the owners have failed to complete the required work and apparently feel they are now financially incapable of completing it. The owners have indicated through their attorney that they will file personal and business bankruptcy. At this point, no further work is anticipated on the part of the owners.

We request that Environmental Services review this situation as a potential removal action. If you need further information or want to discuss this matter, please contact Mr. John Madras or me at (314) 751-3176. We appreciate your help in this matter.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY

Jim Belcher

Jim Belcher, Acting Chief
Superfund Section
Waste Management Program

JB:jmh

Enclosure

cc: Mr. Doug Edwards, Laboratory Services Program
Mr. Greg Reesor, U. S. Environmental Protection Agency

Hand - Do you wish to assign this to someone in the jurisdiction of Oregon? Write-in with sampling?

HAZARDOUS WASTE COMPLIANCE INSPECTION REPORT

R&O Processors, Incorporated
P.O. Box 351, W. Highway 60
Granby, Missouri 64844
EPA I.D. #MOD980687073
MDNR I.D. #03522

INTRODUCTION:

On October 4, 1988, an inspection was conducted at R&O Processors, Inc. of Granby in Newton County, Missouri. This inspection was to determine the facility's compliance with the Missouri Hazardous Waste Management Law and Regulations. The Missouri Department of Natural Resources (MDNR) was represented at this inspection by Mr. Tom Judge of the Division of Environmental Quality's Waste Management Program. The facility was represented by Mr. Robert Moffet, President of the company, and by Mr. Daniel Moffet, Operation/Maintenance/Environmental Supervisor of the plant. Also present during parts of the inspection were Mr. Nylen (Lee) Allphin, Mr. Michael T. Chapman, and Mr. Mark D. Smith, acting as consultants to R&O Processors, Inc. on business and technical matters. Mr. Allphin was the principal spokesman for the facility. Also on site for MDNR on this day were Mr. Larry Alderson of the Laboratory Services Program and Mr. Gale Roberts of the Springfield Regional Office who were conducting a sampling investigation which will be separately reported. R&O Processors, Inc. is a metal finishing plant with various plating processes. The company has seven employees including both Messrs. Moffet. Items plated are machine parts and stampings done on purchase orders. Processes using cyanide include brass plating on steel and copper plating on steel. Processes not using cyanide include zinc plating on steel, chromium plating on steel, black oxide plating on steel, nickel plating on steel, and anodizing aluminum. Tin plating has been done in the past and tin plating fluids are currently stored on-site.

The plating processes consist of a series of fiberglass vats used for cleaning, pickling, plating, various rinses, and bright dipping. Metal parts are contained in small perforated polypropylene barrels and various racks and baskets which rotate or are dipped in the vats. The barrels, racks, or baskets are moved by hand from vat to vat. There are five lines which include the brass/copper line (also used for nickel), the zinc line, the black oxide line, the aluminum anodizing line, and the chrome line. The brass/copper line consists of vats for alkaline cleaner, water rinse, HCl acid, cyanide strip/rinse, brass cyanide plating solution, final rinse, dryer (oven). Other vats contain nickel plating solution (nickel sulfate, nickel chloride, boric acid) and copper cyanide plating solution. The chromic acid tank is used for bright dip in the brass line. The zinc line consists of vats for alkaline cleaner, water rinse, HCl acid, alkaline zinc plating solution, water rinse, water rinse, bright dip (patented solution called blue bright), water rinse, water rinse. The black oxide basket line includes cleaning by hand then vats for water rinse, alkaline black oxide solution, water rinse. The anodized aluminum rack line consists of vats for: alkaline etch cleaner, water rinse, low pH patented desmut solution, water rinse, nitric acid, water rinse, sulfuric acid, water rinse, water rinse. The chrome line consists of a chromic acid tank and a rinse tank. The vats in the various lines are not strictly used in sequence, with some vats such as acid pickling and rinsing used several times alternatively before going to a plating vat. No plating or processing was observed taking place during the inspection.

Interim storage of spent acids and rinse is done in an outdoor, uncovered, large concrete-walled tank that has two concrete wall partitions dividing the tank into three equal compartments with measurements of 20' x 10' x 4' each. The west partition wall had collapsed and has been set back in place, leaving a visible gap. The east partition wall had pulled away from the south outer wall leaving a one-inch gap. All three compartments of the tank were therefore interconnected. The sludge/liquid levels in all three parts of the tank were equal and provided about two feet of freeboard. The concrete tank appeared to be leaking at the southeast corner from a crack extending the visible height of the wall, and at the southwestern corner of that same tank another crack extended the visible height of the wall. Both cracks exhibited significant moisture and staining (see attached photo), and the ground at the southeast corner appeared saturated. Fluids are routinely added to this tank; nothing has been removed since at least 1985 and the tank levels have declined approximately 6" from the levels reported for 1987's inspection.

The west portion and center portion of the concrete tank are used to store spent acids and rinses from all non-cyanide processes except chrome plating. Fluids are dumped into grated open channels in the concrete floor of the plating building. These flow into the center compartment of the outside concrete tank. The open channels were clear at the time of inspection. This compartment had about two feet of freeboard, and the remaining two feet contained sludge. The adjacent west compartment appeared to contain two to three inches of water over 1.75 feet of sludge. The east compartment of the concrete tank is used to store cyanide-bearing fluids (F007, F009) which have been treated with sodium hypochlorite. This tank contains about a foot of supernatant above a foot of sludge. No shipment of this F007/F009 waste has ever been made and additions to tank contents have taken place continuously since 1985, in quantities subject to the amount of plating activity.

It cannot be documented that any wastewater has ever been treated by the equipment in place, and no shipment of treatment sludge has ever been made from the facility. The wastewater treatment system has not been operated nor permitted under NPDES during the past year. All makeup water has been from the deep well on the site. At the time of inspection, Mr. Robert Moffet estimated that approximately 200 gallons of sludge and wastewater have been discharged to the system each month for the past year. The proposed process water recovery system would have used pH adjustment with sulfuric acid or caustic soda, addition of flocculating agent, settling in the 5000-gallon settlement tank with the decanted liquid going to the 10,000-gallon reclaimed water tank and bottoms going to the centrifuge. Centrifuged liquid would go to the reclaimed water tank and solids drummed and shipped as F006. Since the water recovery system has not operated in the past year and the floor drains empty directly into a 5' x 3' x 4' sump adjacent to the water treatment machinery, the sump has become brim-full of sludge and anything discharged to it is overflowing directly to the outside tanks. It should be carefully noted that until this unit receives a discharge permit for compliance with Clean Water laws, any operation of this unit would constitute treatment of hazardous waste without a permit. (Please see 40 CFR 265.1(c)(10) and 40 CFR 260.10 - "wastewater treatment unit".)

The other registered waste stream was F009 spent stripping solution bearing cyanide from stripping zinc and copper from steel parts. A 24-drum shipment of this spent stripper (listed as F009, D001, D006, D008 as the result of testing) containing 1,320 gallons was made on September 15, 1986, to Chemical Waste Management in Sulfur (Cariyss), Louisiana. At the time of inspection none of this waste was in storage, except as mixed into the outside tank contents.

UNSATISFACTORY FEATURES: Federal regulations cited have been adopted by reference.

1. Releases of hazardous waste to the environment not addressed. 40 CFR 265.15(c), 40 CFR 265.31, 40 CFR 265.194(c), and 40 CFR 265.196
2. Storage of hazardous waste without a permit or interim status. 40 CFR 270.1(c) and 40 CFR 262.34
3. No waste analysis plan and no program of regular or routine waste analysis being conducted. 40 CFR 265.13
4. No restricted access sign at entry to tank walkway or at doorway to Wastewater Treatment Room. 40 CFR 265.14(c)
5. Facility inspections are not adequate and not documented. 40 CFR 265.15 and 40 CFR 265.195(c)
6. No personnel training plan or documentation. 40 CFR 265.16
7. The tank storage area did not possess internal or external communication devices or spill control equipment. 40 CFR 265.32
8. No contingency plan or emergency procedures available at the time of the inspection. 40 CFR Part 265 Subpart D
9. No operating record for the facility. 40 CFR 265.73
10. No biennial reports filed by the facility. 40 CFR 265.75
11. No closure plan for the facility. 40 CFR 265.112
12. No financial assurance for closure of the facility. 40 CFR 265.143
13. No financial assurance of liability coverage for the facility. 40 CFR 265.147
14. Failure to have the condition of existing storage tanks assessed and documented by an independent registered professional engineer. 40 CFR 265.191

COMMENTS:

The inspection began with a facility tour which started at the outdoor storage tanks on the south exterior of the process building (see attached diagram). Mr. Nylen (Lee) Allphin was spokesman for the company and was present during all points of the inspection. Although no waste shipments had been made since the last inspection nor any processing of tank contents, tank contents appeared to have decreased 2,000 gallons or more by dropping 6"-7". These tanks are open to rainwater, so attributing the decline to evaporation is not reasonable. In addition, Mr. Moffet estimated during questioning that he has discharged 200 gallons/month to the tanks in the last year. As two large cracks and leaks in the outer wall of the tanks are highly visible (see photos and diagram) and soil was saturated next to the tanks on a dry day, it may be suspected that fairly large quantities of liquids have been leaking from the tanks and continue to do so. This apparent chronic release of hazardous waste is in addition to past documented overflows from the tanks. The outdoor tanks are now behind fencing and have been labeled.

The inspection then proceeded to the main production floor. No processing was observed taking place at the time of inspection. The problem of overflowing floor drains and gutters and waste mixing and mingling on the shop floor that had been observed at previous inspections was not observed on this occasion. The inspection proceeded to the Chrome Room where it was observed that neither the door giving access to the walkway above the outside tanks nor its vicinity contained the required sign restricting access with the words "Danger-Unauthorized Personnel Keep Out".

The Wastewater Treatment Room was next inspected. The wastewater treatment system has not been used in the last year, and all waste discharged to the gutters and floor drains from process units passes through a sump and overflows into the outside tanks. The sump was observed to be 5' x 3' in area and was said by Mr. Moffet to be 4' in depth. At the time of the inspection, the sump was observed to be absolutely full of sludge, with little or no supernatant. The 10,000 gallon "flocculation tank" appeared empty. As the 5,000 gallon "settling tank" could not be readily inspected, it was not determined if this tank contained any raw or unprocessed waste. No plant personnel questioned knew if this tank contained waste at the time of the inspection. As storage of hazardous waste is taking place in the Wastewater Treatment Room sump, the facility should at least provide restricted access signs as described above. Further deficiencies noted were the lack of any communication or spill control equipment in proximity to the indoor or outdoor storage areas.

The inspection concluded with an interview of management personnel and a review of plant records and other paperwork. After a search, the file of manifests was located for inspection. No shipments of waste had been initiated in the last year since the previous inspection. None of the other required records or plans were available or existing. There was no operating record. There was no waste analysis plan or analysis records for waste going into treatment or storage, although some analyses of tank contents had been conducted for disposal purposes. There were no inspection records nor a written schedule and criteria for inspections. There was no personnel training plan nor any records able to provide the necessary documentation of personnel training. There was no contingency plan for the facility. No Biennial Facility Report has been prepared or submitted by the facility. There are no financial assurances for closure or liability. No assessment of hazardous waste storage tanks by an independent professional engineer had been documented or conducted.

The entire situation and conditions under which hazardous waste has been stored for years in tanks is extremely serious. The procedural and financial safeguards designed to protect workers, the community, and the environment which are embodied in the required plans, financial assurances, security and storage requirements, and physical specifications for the tanks are either inadequate or completely absent. Especially serious is the company's inability or unwillingness to address the chronic and easily visible release of hazardous waste to the environment from the outdoor tanks. The inspection did not reveal any attempt that had been made to arrest or effectively address this release in the past year. The original crack and leak have gotten much worse, and another large crack has appeared. The tanks have not been covered, allowing rainwater to increase the head which drives the release. No apparent attempt has been made to patch or stop the leaks. No attempt has been made to stop discharge to the tanks, determine the actual type and amount of discharges to the tanks, or determine the volume of waste being lost through the release. No attempt has been made to assess the true extent of damage or to remedy damage to the environment, although this responsibility is explicit in 10 CSR 25-7.265(2)(J) and 40 CFR 265.196, and should be obvious. As the facility is the subject of

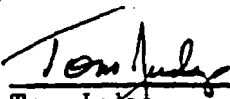
enforcement action and litigation in this matter, the company cannot plead it is ignorant of the fact it has a significant release to the environment that is getting progressively worse.

RECOMMENDATIONS:

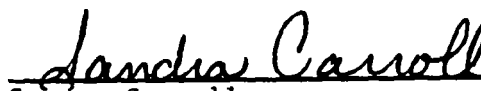
1. Immediately cease discharge of waste to the outside tanks. Prevent the entry of precipitation to the outside tanks. Immediately assess the need to take any actions to prevent failure of the tanks and take any appropriate actions. Take action to prevent the development of more leaks from the tanks, and to seal existing leaks. Empty the tanks as soon as possible, pursuant to 40 CFR 265.196, and properly dispose of the hazardous waste they presently contain. Cease storing beyond the time allotted for nonpermitted non-interim status facilities.
2. Thoroughly assess the type and extent of contamination that has occurred at the facility. Prepare a closure plan and submit it to MDNR for approval. Implement the approved plan.
3. Provide all storage areas with appropriate restricted access signs, communication devices, and spill control equipment.
4. Produce, implement and document a personnel training plan adequate to satisfy the requirements of 40 CFR 265.16.
5. Conduct, document and act upon facility inspections adequate to satisfy 40 CFR 265.15 and 40 CFR 265.195(c). This must include appropriate response to leaks.
6. Develop, implement and document a contingency plan and emergency procedures adequate to satisfy 40 CFR Part 265 Subpart D.
7. Either provide a waste analysis plan, operating record and financial assurances for closure and liability coverage able to satisfy the requirements of the law and regulations or certify closure according to a plan approved by the Department of Natural Resources.

SUBMITTED BY:

APPROVED BY:



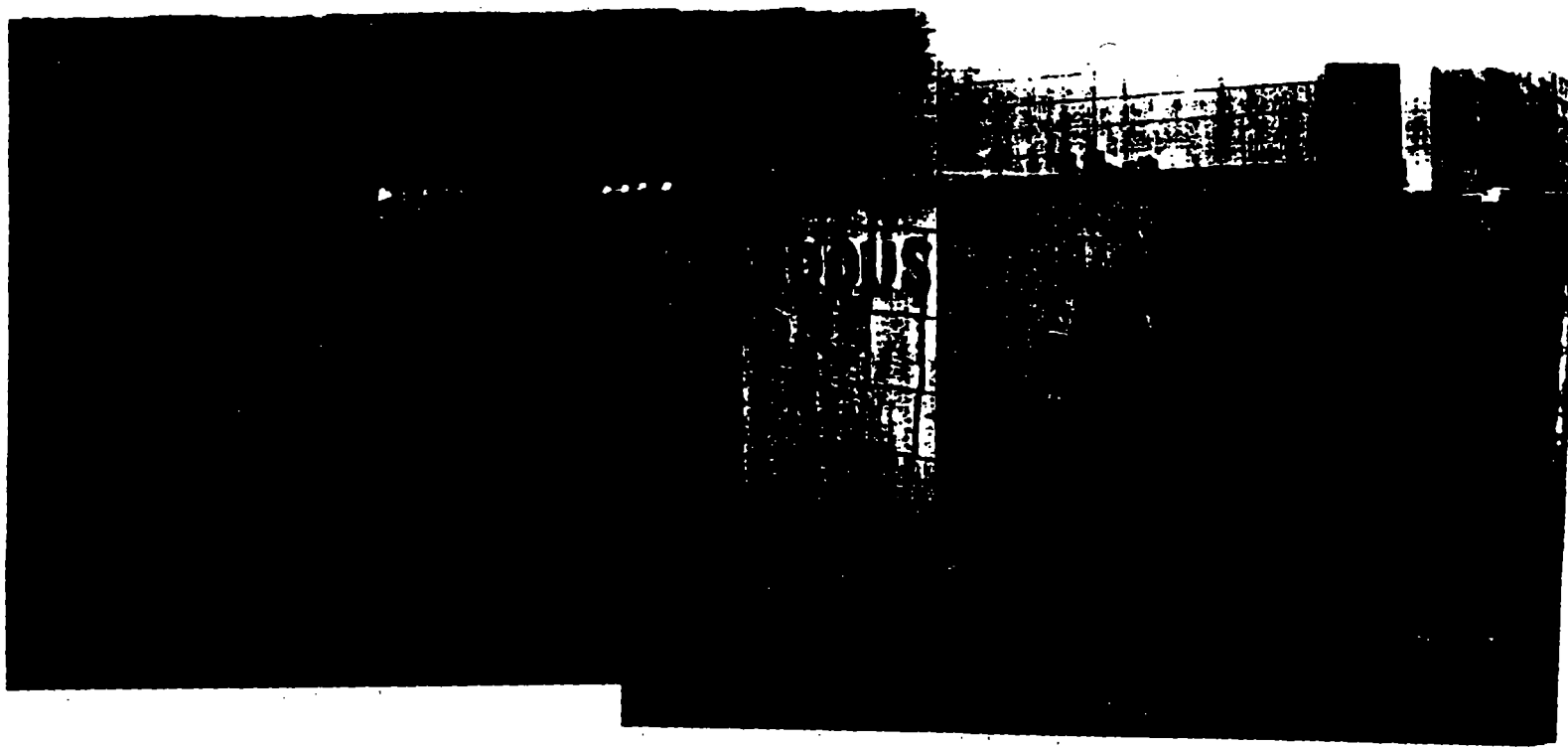
Tom Judge
Environmental Specialist
Enforcement Section
Waste Management Program



Sandra Carroll
Chief, Hazardous Waste Enforcement Unit
Enforcement Section
Waste Management Program

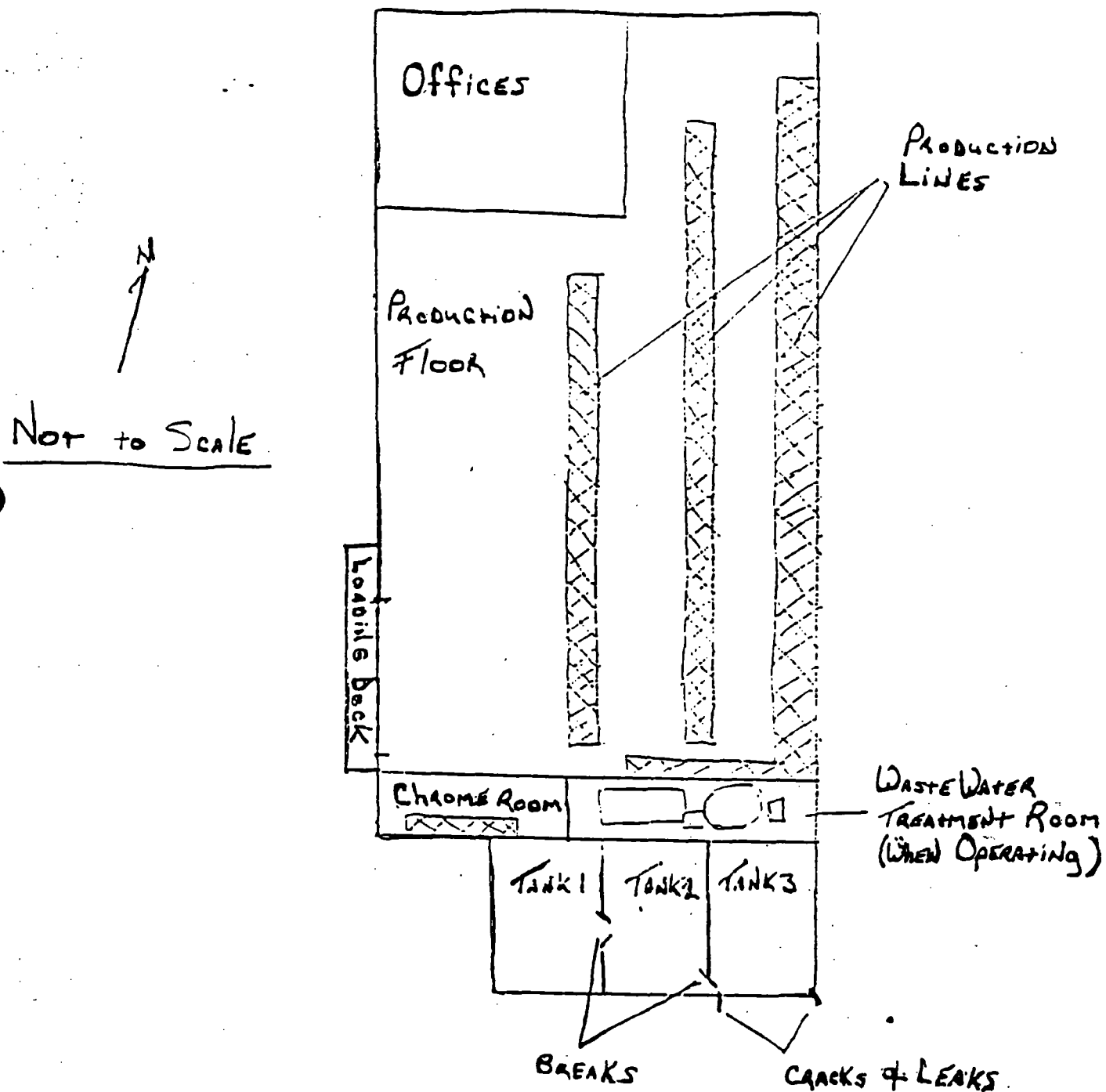
TJ:dr

Attachments



Exterior tanks at R&O Processors - 10/4/88. Note cracks, leaks, and release to soil. (Videotape available in safe at the Waste Management Program - Jefferson City)

R & O PROCESSORS, INC. - GRANBY, MO - 10/4/88



HAZARDOUS WASTE TREATMENT/STORAGE/DISPOSAL FACILITY Interim Status Checklist

Name of Facility: R&O PROCESSORS Date: 10-4-88
Address: P.O. Box 147 W. Highway 60
Granby, MO Missouri I.D. # 03522
Facility Representative: Robert Moffat EPA I.D. # MO0980687073
Title: PRESIDENT Phone Number 417/472-3943
Is this facility a TSD? Illegal - SSG Note Transporter? NO

Page 2

Provide a brief description of the manufacturing process.

Various electroplating & metal coating processes.
SSG report includes brass, Cu, Zn, Cr, Ni, and
Black Oxide on steel, Aluminum anodizing. Capable
of doing Sn-plating - but not currently doing.

List the hazardous wastes generated:

Waste	Amount/month	Kilogram/month	I.D.#	Disposition
1. <u>Mixture (SSG report)</u>	<u>~ 100 gal.</u>			<u>Outside truck Storage</u>
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____
6. _____	_____	_____	_____	_____

- A. Manifests and Recordkeeping 16 CFR 261.23(a)(1) and 261.23(a)(2) and (3) NA
- Generator's name and EPA I.D. Number.....()
 - Manifest document number (16 CFR 261.23(a)(1) and (2)).....()
 - EPA Waste I.D. code.....()
 - Generator's name, address, phone #.....()
 - All Transporters' names, phone #'s, and EPA I.D. #'s.....()
 - Designated facility name, address, phone # and EPA I.D. #.....()
 - Proper DOT Shipping Name, Hazard Class and I.D. #.....()
 - Consignor, Quantity and this info being shipped properly designated.....()
 - Proper certification including waste description.....()
 - Manifest properly signed and dated.....()
 - No more than 60 days time between generator and facility signatures.....()
 - Manifest returned within 30 days.....()
 - If not, exception generator return submitted within 60 days.....()
 - Complete manifests and facility Manifest Report and Certification.....()

- B. PRETRANSPORT, CONTAINERIZATION AND LABELING 16 CFR 261.23(a)(1) and 261.23(a)(2)
- Waste packaged, marked and labeled per DOT during entire on-site storage period and prior to transport.....() NA
 - Placards available for use by transporters.....()
 - Facility communication requirements met (if applicable).....() NA
 - Stored in satellite area less than 1 year.....()
 - Containers marked identifying contents and regulatory data.....()
 - Containers kept closed/unavailable until disposal.....()
 - Quantities accumulated not exceeding 30 gal. (1 qt. except for waste).....()
 - WASTE ANALYSIS 16 CFR 261.23(a)(1) and 261.23(a)(2)
 - Waste analysis plan.....()
 - Identify hazardous waste based on analysis.....()
 - Name of condition causing removal from off-site.....() NA
 - SECURITY 16 CFR 261.23(a)(1) and 261.23(a)(2)
 - 24-hour surveillance system on facility or.....()
 - An artificial or natural barrier.....() MARGINAL

HAZARDOUS WASTE TREATMENT/STORAGE/DISPOSAL FACILITY Interim Status Checklist

Page Two

6. GENERAL INSPECTION 10 CFR 26.7.2AM(1) AND 7.2AM(2)(B)

10. Facility inspection and maintenance.....(P)
11. Inspection log and written schedule for monitoring.....(P)
12. Inspect emergency equipment.....(P)
13. Inspect security devices.....(P)
14. Inspect operating and structural equipment.....(P)

7. PERSONNEL TRAINING 10 CFR 26.7.2AM(1) AND 7.2AM(2)(B)

11. Documentation of hazardous waste disposal's qualifications or training.....(P)
12. Complete classroom or on-the-job training.....(P)
13. Job title, description, and name of person filling position.....(P)
14. Written record of the type and amount of training given.....(P)
15. Documentation confirming that training has been given.....(P)

8. PREPAREDNESS AND PREVENTION 10 CFR 26.7.2AM(1) AND 7.2AM(2)(C)

16. Internal communication or alarm system.....(P)
17. Devices in the hazardous waste operation area capable of emitting emergency assistance.....(P)
18. Fire control, spill control, and decontamination equipment available.....(P)
19. Adequate water supply for fire control equipment.....(P)
20. Adequate and proper safety equipment available.....(P)
21. Adequate waste space.....(P) NA
22. Arrangements with local emergency agencies.....(P)

9. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CFR 26.7.2AM(1) AND 7.2AM(2)(D)

23. Contingency plan.....(P) NONE
24. Detailed description of procedures that personnel must implement in response to fire, explosion, or release of hazardous waste.....(P)
25. Detailed formal arrangements with emergency agencies.....(P)
26. Name, address and phone number (home & office) of emergency contact person.....(P)
27. Emergency equipment including its description and location.....(P)
28. Evacuation plan if applicable.....(P)
29. Waste oil 10 CFR 26.11.010 Don't appear to you.....(P)
30. Waste oil properly handled.....(P) NA
31. Written waste oil content maintained.....(P) NA

COMMENTS:

1. MANIFEST, RECORD, SIGNATURE 10 CFR 26.7.2AM(1) AND 7.2AM(2)(E)

For off-site facilities

31. Manifest signed and dated.....(P)
32. Copy to transporter.....(P) NA
33. Copy to generator in 30 days.....(P)
34. Copy to facility for 3 years.....(P)
- Operating record NONE
35. Description, quantity, and TSD process for all hazardous waste.....(P)
36. Location and quantity of all hazardous waste.....(P)

37. Waste analysis records from off-site sources.....(P)
38. Summary and description of emergency incidents.....(P)
39. Record of inspections.....(P)
40. Monitoring, testing and analytical results as necessary.....(P)

Reporting

41. Unannounced waste reports for off-site facilities.....(P) NA
42. Reports for transportation, spills, closures.....(P) NA

5. INTERIM STATUS CONTAINERS 10 CFR 26.7.2AM(1) AND 7.2AM(2)(I)

43. Containers closed and in good condition.....(P)
44. Containers used of materials compatible with hazardous waste placed in them.....(P)
45. Containers used containers storage area inspected each month.....(P)
46. Inspection log.....(P)
47. Containers holding ignitable or reactive waste at least 20 ft. from the property line.....(P)
48. Incompatible wastes placed in different containers.....(P)
49. Are storage containers holding hazardous waste which are incompatible with each other separated by dikes, walls, walls, or other barriers.....(P)
50. Containers stored within a containment system (if applicable) meeting criteria of 10 CFR 26.7.2AM(2)(I).....(P)

6. INTERIM STATUS TANKS CHECKLIST 10 CFR 26.7.2AM(1) AND 7.2AM(2)(J)

51. Tanks in good condition.....(P)
52. Uncovered tanks have a minimum of 2 ft. of freeboard.....(P)
53. If not, is the tank equipped with a containment structure, a drainage control system, or a diversion structure.....(P)
54. Tanks with containment baffles equipped with a means to stop leaks.....(P)
55. Are waste analyses conducted before placing a substantially different waste into a tank used for storage or treatment.....(P)
56. Daily inspections conducted on drainage control equipment.....(P)
57. Bases gathered from monitoring equipment each week day.....(P)
58. Level of waste in tanks checked at least once a day.....(P)
59. Tanks inspected weekly.....(P) UNDOCUMENTED
60. Records of these inspections retained.....(P)
61. If ignitable or reactive waste in tanks, then it is treated, rendered, or mixed so that the mixture no longer meets the definition of ignitable or reactive.....(P) Hypochlorite destroyed by CH
62. Ignitable or reactive waste stored properly.....(P) Leaking
63. Ignitable or reactive waste in covered tanks in compliance with the National Fire Protection Agency (NFPA's) buffer zone requirements.....(P)

COMMENTS:

8. INTERIM STATUS SURFACE IMPROVEMENTS 10 CFR 26.7.2AM(1) AND 7.2AM(2)(K)

64. 3 ft. of treatment in surface improvements.....(P) NA
65. Surface dikes have protective covers.....(P)
66. Are dikes, containment, or systems of existing surface improvements designed with double liner and leachate system as required by 10 CFR 26.7.2AM, July 15, 1983.....(P)

Off-site facility NO

Interim status IL/CGA (Now-Permit, Now-T.S) Storage

Provide a brief description of the hazardous wastes handled at each TSD process.

Waste	Amount/month	I.D. #	TSD Process	Design Capacity
Mixture (SAB report)		NA		

HAZARDOUS WASTE TREATMENT/STORAGE/DISPOSAL FACILITY Interim Status Checklist

17. Waste analyses conducted or written documentation retained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment.....()
18. Freshwater level inspected once operating day.....()
19. Dikes and vegetation inspected weekly for leaks, deterioration or failures....()
20. Inspections conducted to impoundment logs.....()
21. Waste treated, rendered or stored so that storage no longer meets the definition of ignitable or reactive.....()
22. Incompatible wastes segregated to separate surface impoundments.....()
23. GROUNDWATER MONITORING 10 CSR 25-7.265(1) AND 7.265(2)(7) NA
Applicable to surface impoundments, landfills and landfills.....()
23. Groundwater monitoring wells installed.....()
24. Wells are structurally sound.....()
25. Sampling and analysis plan on-site.....()
26. Samples and groundwater levels taken.....()
27. Groundwater monitoring results kept.....()
28. CLOSURE AND POST-CLOSURE 10 CSR 25-7.265(1) AND 7.265(2)(8)
27. Closure plan for facility.....()
28. Description of how and when facility will be closed.....()
29. Estimates of current inventory of hazardous waste.....()
100. Steps to decontaminate equipment.....()
101. Post-closure plan for closed facility only.....()
29. FINANCIAL ASSURANCE 10 CSR 25-7.265(1) AND 7.265(2)(9)
102. Cost estimate for facility closure.....()
103. Financial assurance for closure and post-closure.....()
104. Liability for sudden accidents.....()
105. Liability for non-sudden accidents for closure only.....()

Please mark boxes as shown

☒ In compliance☐ In violation

Inspector's Signature

Thomas M. Judge - Thomas M. JudgeTitle Environmental Specialist - Enforcement SectionOffice Waste Management Program

TANK CHECKLIST (FOR I.S. AND G)

FACILITY K40 PROCESSIONS

DATE 10/4/86

INSPECTOR Tom Jones - WMP

HAZARDOUS WASTE STORAGE TANKS

Waste Contained

FOOB F009 (B11, F007, F008)

miscellaneous + sludge

Tank Volume

3 - 20' x 10' x 4'

inter connected, NO segregation

49 CFR 263.191 - Existing Tanks

Note 11-A: Check Date for new tanks - 263.191(a)

If Secondary Containment is necessary (see criteria), has tank assessment been done and documented by a P.E.? (See 263.192(a) for all elements.)

If leaking, facility has addressed 263.194? (See 263.192(a) for all elements.)

49 CFR 263.192 - New Tanks

NA

Tank assessment done and documented by P.E.? (See 263.192(a) for all necessary elements.)

Documentation by P.E. that all design/construction inadequacies, per 263.192(b) identified and corrected prior to commissioning or use.

Backfilling of underground components done properly?

Tightness tested prior to commissioning/use?

Statement by P.E. on remedy of any tightness failures?

Corrosion protection specified by Assessment is present? Statement by independent expert on proper installation?

49 CFR 263.193 - Releases

CONTINGENCY (Note how applies to repair, replacement, and reinstallation of new and existing systems.) See annotations to (f) & (g), and extension for new tanks - 263.193(a)(5).

Provided for:

- New Tanks.....
- FOOB-23, F024-27 (by 1/12/89).....
- Tanks 11 yr. old, or 1/12/89, whichever older.....
- Facility > 7 yr. old; Facility = 15 yr., or 1/12/89.....
- Facility < 7 yr. old (by 1/12/89).....

Secondary containment designed, constructed, and operated to ensure adequate integrity, stability, leak detection, and timely remedy of spills and leaks (see criteria).....

- Good liner(s).....
- Good vent(s).....
- Good Double-Well Tank(s).....
- New/Existing Auxiliary Equipment.....
- Valves being complied with.....

Annual records: leak test for non-removable underground independent inspection, leak test for others.....

49 CFR 263.194 - Spill Prevention

Necessary spill prevention controls in place, operating.....

Necessary overflow prevention controls in place, operating.....

Adequate freboard in uncovered tanks.....

49 CFR 263.195 - Inspections

NOT Documented, NO spill response

Daily inspections conducted for proper operation & release detection (For example: pressure with corrosion, erosion, overflow/spill control equipment, monitoring and leak detection equipment and data, plus any releases.)

Cathodic Protection inspections done on schedule..... Normal Operations: 0 m. after installation, and yearly. Applied current sources: every 4 months.

All inspections documented.....

49 CFR 263.196 - Leak/Spill Response

Flow of waste was immediately stopped.....

Waste removed from tank or containment in timely manner.....

All released waste & contamination found and removed..... See 49 CFR 25-7.263(2)(j)(2).

Release properly reported.....

Did release response require tank closure? ✓ - Will
Did see components, repairs, containment

Non-portions addressed above to 263.192 & 193? ✓ - No new, a

Independent P.E. certifies extensive repairs?..... (NA)

49 CFR 263.198 - Requirements for Inertible/Reactive Waste

Storage conditions maintain or eliminate the threat of reaction or ignition.....

SPM "buffer zone" requirements met.....

DEFINITION STATE ONLY

49 CFR 263.197 - Closure/Post-Closure (Facilities w/o adequate secondary containment only)

Closure plan and cost estimates must address and detail NA
for clean closure or "dirty" closure contingencies.....

49 CFR 263.202 - Waste Analysis

Waste analysis &/or trial tests documented before creating/storing a substantially different waste or with a substantially different process in the same tank..... no ph

IN COMPLIANCE (✓)

UNSATISFACTORY ()

ATTACHMENT C
Limited Title Search



Commonwealth.
Land Title Insurance Company

LIMITED TITLE CERTIFICATE

Newton County Abstract & Title Co.

P.O. Box 308
Neosho, Mo. 64850
(417) 451-3127

TO: Kathleen Wright, 13722 Shoreline Court E, Earth City, Mo. 63045

SUBJECT DESCRIPTION:

That part of the Northeast Quarter of the Northwest Quarter of Section 10, Township 25, Range 31, described as beginning at the Southeast corner of said Northeast Quarter of the Northwest Quarter, thence North 300 feet, thence West 180 feet, thence South 300 feet, thence East 180 feet to the point of beginning together and with the the right of ingress and egress over and across a tract described as beginning at a point 180 feet West and 300 feet North of the Southeast corner of said Northeast Quarter of the Northwest Quarter (Northwest corner of the above described tract), thence South 40 feet, thence West 180 feet, thence North to the Southerly right of way line of U.S. Highway 60, thence Easterly along said right of way line 40 feet, thence South to a point due West of the point of beginning, thence East 140 feet more or less to the point of beginning.

We hereby certify that we have examined the records of Newton County, Missouri relative to the above described real estate and the owner(s) thereof from the 18th day of April, 1981 to the date of this certificate and find that the record title purports to vest in:

R & O Processors, Inc.

SUBJECT TO THE FOLLOWING:

MORTGAGES:

Deed of Trust dated November 13, 1981 and recorded November 18, 1981 at 2:25 pm in Book 238 at Page 601 executed by R & O Processors, Inc. in favor of Dayton L. Mackey, trustee for First National Mercantile Bank, Monett, Mo. securing payment of a promissory note in the original amount of \$115,000.00.

Deed of Trust dated December 3, 1982 and recorded December 6, 1982 at 4:00 pm in Book 239 at Page 189 executed by R & O Processors, Inc. in favor of Dayton L. Mackey, trustee for First National Mercantile Bank of Monett securing payment of a promissory note in the original amount of \$53,700.00.

GENERAL JUDGMENTS: None



Commonwealth.
Land Title Insurance Company

FEDERAL JUDGMENTS:

Federal Tax Lien #737 filed the the office of the Recorder of Deeds of Newton County, Mo. on April 24, 1987 against R & O Processors Inc and in favor of United States of America in the original amount of \$11,673.28.

FEDERAL COURT JUDGMENTS AND BANKRUPTCY PROCEEDINGS NOT CERTIFIED.

TAXES: 1988, 1989 and 1990 taxes due in county. (\$1118.03, \$1107.31 & \$1107.31, all plus penalty & interest) PRIOR years paid.

TAX I. D. NO. 4114.0120

We further certify that there are no attachments, executions or mechanic's liens of record against the above owner(s) other than are shown herein.

(Liability of this certificate is limited to the fee charged.)

WITNESS our hand this 18th day of April, 1991 at 3:50 pm

NEWTON COUNTY ABSTRACT & TITLE COMPANY

BY:

Carole Embery

ATTACHMENT D
Deed: Bessie A. Lovelady
Robert W. Moffet

WARRANTY DEED.

FORM 1 — Printed and for sale by The Joplin Printing Company, Joplin, Mo.

This Indenture, Made on the 23 day of August
A. D., One Thousand Nine Hundred and seventy-two by and between
Bessie A. Lovelady (who warrants and avers that she is the surviving
widow of J. Frances Lovelady, the said J. Frances Lovelady having
departed this life on the 5 day of September, 1970, they never
having been divorced during their ownership of the above property.)

of Newton County, Missouri party of the First Part, and
Robert W. Moffet and Pauline Moffet, his wife

In the State of Missouri parties of the County of Newton
of the Second part:
WITNESSETH, That the said party of the First Part, in consideration of the sum of
One dollar and other valuable considerations ~~RECEIPTS.~~
to her paid by the said parties of the Second Part, the receipt of which is hereby acknowledged,
does by these presents, Grant, Bargain and Sell, Convey and Confirm unto the said parties of the
Second Part, their heirs and assigns, the following described Lots, Tracts or Parcels of Land lying,
being and situate in the County of Newton and State of
Missouri All

The Northwest Quarter (NE $\frac{1}{4}$) of the Northwest Quarter (NW $\frac{1}{4}$) of Section
10, Township 25, Range 31 lying South of Highway 60, containing 8 $\frac{1}{2}$
acres more or less

TO HAVE AND TO HOLD, The premises aforesaid, with all and singular the rights, privileges
appurtenances and immunities thereto belonging, or in anywise appertaining unto said parties of
the Second Part, and unto their heirs and assigns FOREVER; the said party of the
First Part hereby covenanting that she is lawfully
seized of an indefeasible Estate in Fee in the premises herein conveyed; that she has a good
right to convey the same, that the said premises are free and clear of any incumbrances done or suffered
by her or those under whom she claims title and that she will WARRANT
AND DEFEND the title of said premises unto the said parties of the Second Part, and unto their
heirs and assigns FOREVER against the lawful claims and demands of all persons whomsoever.

IN WITNESS WHEREOF, the said party of the first Part has hereunto set her
hand and seal the day and year first above written.

Signed, Sealed and Delivered in the presence of us.

Bessie A. Lovelady (Seal)
Bessie A. Lovelady

(Seal)

(Seal)

(Seal)

STATE OF MISSOURI.

COUNTY OF _____

SS.

On this _____ day of _____, 19____

before me, a _____ in and for said County, personally appeared _____

and _____ his wife,

to me known to be the person described in and who executed the foregoing instrument, and acknowledged that _____ executed the same as _____ free act and deed.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal at my office in _____ in said County and State, the day and year first above written.

My term expires _____, 19____

STATE OF MISSOURI.

COUNTY OF Newton

SS.

On this 23 day of August, 1972.

before me, a Notary Public in and for said County, personally appeared Bessie A. Lovelady

to me known to be the person described in and who executed the foregoing instrument, and acknowledged that she executed the same as her free act and deed. And the said Bessie A. Lovelady

further declared herself to be single and unmarried.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal at my office in _____ in said County and State, the day and year first above written.

My term expires March 9, 1973.



Kenneth W. Robinson
Kenneth W. Robinson
Notary Public, Newton County, Missouri

General Warranty Deed

FROM

Bessie A. Lovelady, SS.

TO

Robert W. Newton and wife

Filed for record this _____ day of _____, A.D. 1972

at _____ o'clock _____ P.M.

at _____ office of _____

_____ Recorder

_____ Newton

Record and Email to

Robert W. Moffet

Route 1

Granby, Missouri 64844

Notary Public, Newton County, Missouri

By _____ Deputy

Recorder: Leland L. Berry Ex Officio

of August A.D. 1972

at Neosho this 29th day

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal at _____ at _____

office, and is recorded in the records of this office in Book 283

_____ on the 24th day of August, A.D. 1972, duly filed for record in this

office, and is recorded in the records of this office in Book 283

_____ at _____ o'clock and _____ minutes

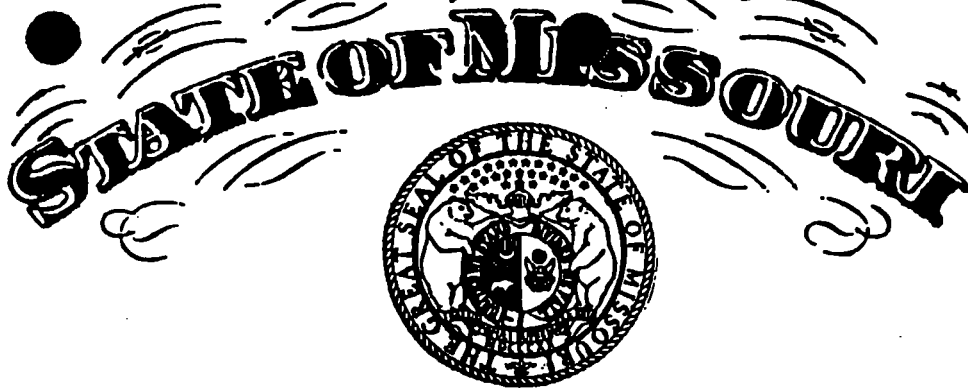
IN THE OFFICE OF THE RECORDER OF DEEDS

Leland L. Berry Ex Officio Recorder of said County.

Filed for record this 24th day of August, 1972 at 1:45 o'clock P.M.
Deputy
LELAND L. BERRY
Circuit Clerk & Ex-Officio Recorder

ATTACHMENT E
Deed: Robert W. Moffet
TO
R and O Processors, Inc.

ATTACHMENT E
Deed: Robert W. Moffet
TO
R and O Processors, Inc.



IN THE RECORDERS'S OFFICE OF NEWTON COUNTY, MISSOURI.

GENERAL WARRANTY DEED

THIS DEED, Made and entered into this 17th day of August, 1951, by and between

Robert W. Moffet and Pauline Moffet, husband and wife

of the County of Newton, State of Missouri, party or parties of the first part, and
R & O Processors, Inc., a Missouri Corporation
P. O. Box 351, Granby, Missouri 64644

of the County of Newton, State of Missouri, party or parties of the second part.

WITNESSETH, that the said party or parties of the first part, for and in consideration of the sum of One Dollar and other valuable considerations paid by the said party or parties of the second part, the receipt of which is hereby acknowledged, does or do by these presents GRANT, BARGAIN AND SELL, CONVEY AND CONFIRM unto the said party or parties of the second part, the following described Real Estate, situated in the County of Newton, State of Missouri, to wit:

That part of the Northeast Quarter of the Northwest Quarter of Section 10, Township 25, Range 31, described as beginning at the Southeast corner of said Northeast Quarter of the Northwest Quarter, thence North 300 feet, thence West 180 feet, thence South 300 feet, thence East 180 feet to the point of beginning, together and with the right of ingress and egress over and across a tract described as beginning at a point 180 feet West and 300 feet North of the Southeast corner of said Northeast Quarter of the Northwest Quarter (Northwest corner of above described tract), thence South 40 feet, thence West 180 feet, thence North to the Southerly Right of Way line of U. S. Highway 60, thence Easterly along said Right of Way line 40 feet, thence South to a point due West of the point of beginning, thence East 180 feet more or less to the point of beginning.

TO HAVE AND TO HOLD THE SAME, Together with all rights and appurtenances to the same belonging, unto the said party or parties forever.

The said party or parties of the first part covenants that said party or parties and the heirs, executors, administrators and assigns of each party or parties, shall and will WARRANT AND DEFEND the title to the premises unto the said party or parties of the second part, and to the heirs and assigns of each party or parties forever, against the lawful claims of all persons whatsoever, excepting however, the general taxes for the calendar year 1951 and thereafter, and special taxes becoming a lien after the date of this deed.

IN WITNESS WHEREOF, the said party or parties of the first part has or have hereunto set their hand or hands the day and year first above written.

Robert W. Moffet
Robert W. Moffet
Pauline Moffet
Pauline Moffet

STATE OF MISSOURI, ss. On this 17th day of August, 1951, before me personally appeared Robert W. Moffet and Pauline Moffet, his wife

to me known to be the persons described in and who executed the foregoing instrument, and acknowledged that they executed the same as their free act and deed.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal in the said County of Newton, the day and year first above written.

My Comm. Expires 2-8-55.
NOTARY
S. K.

Barbara K. Martin
Barbara K. Martin Notary Public

STATE OF Missouri
COUNTY OF Newton

4017

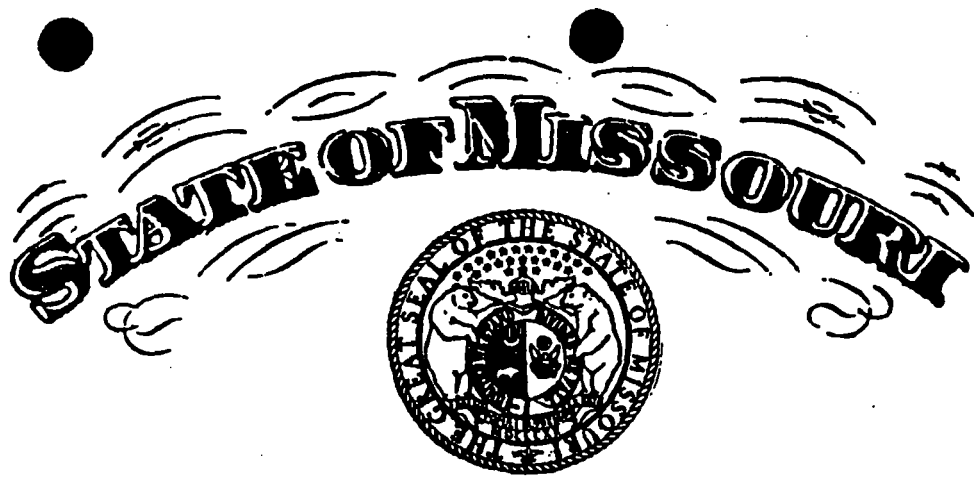
IN THE RECORDER'S OFFICE

I, Richard L. Barry, Recorder of said County, do hereby certify that the within instrument of writing was, at 12 o'clock and 30 minutes P. M., on the 25th day of August, A.D. 1951, duly filed for record in my office, and is recorded in the records of this office, in book 322 at page 2352.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal at this 26th day of August, 1951.

Richard L. Barry
Recorder.

44
Return: P. Hall Bank Month, Mo.



IN THE RECORDERS'S OFFICE OF NEWTON COUNTY, MISSOURI.

COUNTY OF NEWTON }
STATE OF MISSOURI, } ss.

I, Billie M. Gailey, Clerk of the Circuit Court, and Ex-Officio Recorder of Deeds within and for Newton County, Missouri, hereby certify the above and foregoing to be a true copy of the General Warranty Deed as the same appears in Book 322 Page 2352 in my office.

WITNESS my hand as Clerk and Seal of said Court.

DONE this 18th day of April A.D. 1991 at office in Neosho, Missouri.

BILLIE M. GAILEY

Clerk of the Circuit Court and Ex-Officio
Recorder of Deeds.

By Marsha Rose
Deputy Recorder

ATTACHMENT F
Article of Incorporation

ATTACHMENT F
Article of Incorporation

No. 164291



STATE of MISSOURI

JAMES C. KIRKPATRICK, Secretary of State

Corporation Division

Certificate of Incorporation

WHEREAS, duplicate originals of Articles of Incorporation of

..... R & O PROCESSORS, INC.

have been received and filed in the office of the Secretary of State, which Articles, in all respects, comply with the requirements of The General and Business Corporation Law:

NOW, THEREFORE, I, JAMES C. KIRKPATRICK, Secretary of State of the State of Missouri,

by virtue of the authority vested in me by law, do hereby certify and declare

..... R & O PROCESSORS, INC.

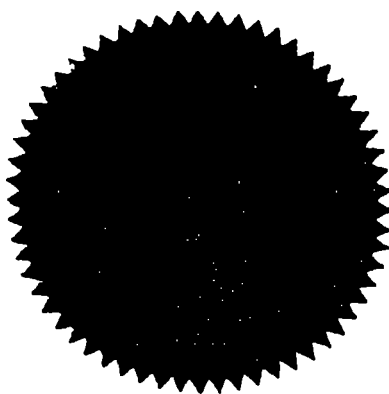
a body corporate, duly organized this day and that it is entitled to all rights and privileges granted corporations organized under The General and Business Corporation Law; that the address of its initial Registered Office in Missouri is

..... Main and Church Streets, Granby 64848

that its period of existence is perpetual; and that the

amount of its Authorized Shares is ----- Dollars.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the GREAT SEAL of the State of Missouri, at the City of Jefferson, this ..17th.. day ofSeptember....., 19..73....



James C. Kirkpatrick
Secretary of State

RECEIVED OF: R & O PROCESSORS, INC.

..... Fifty-three and 00/100 Dollars, \$ 53.00

For Credit of General Revenue Fund, on Account of Incorporation Tax and Fee.

No. 164294

CORP No. 13

Dorothy Miller
Deputy Collector of Revenue



State of Missouri . . . Office of Secretary of State

JAMES C. KIRKPATRICK, Secretary of State

Articles of Incorporation

(To be submitted in duplicate by an attorney)

HONORABLE JAMES C. KIRKPATRICK
SECRETARY OF STATE
STATE OF MISSOURI
JEFFERSON CITY, MO. 65101

The undersigned natural person(s) of the age of twenty-one years or more for the purpose of forming a corporation under The General and Business Corporation Law of Missouri adopt the following Articles of Incorporation:

ARTICLE ONE

The name of the corporation is: R & C PROCESSORS, INC.

ARTICLE TWO

The address, including street and number, if any, of the corporation's initial registered office in this state is: Main and Church Streets, Granby, Missouri 64844 (Newton County)

and the name of its initial agent at such address is: Robert W. Moffet

ARTICLE THREE

The aggregate number, class and par value, if any, of shares which the corporation shall have authority to issue shall be:

300 shares of no par common stock.

The preferences, qualifications, limitations, restrictions, and the special or relative rights, including convertible rights, if any, in respect of the shares of each class are as follows:

The shares of said corporation shall be subject to the following restrictions:

No shareholder of this corporation shall sell his shares, or any part thereof, at any time or from time to time, without first offering the same to the other shareholders of this corporation upon the same terms as his proposed sale. A shareholder desiring to sell his shares, or any part thereof, shall file in writing with the secretary of this corporation a notice of his intention stating the terms of the proposed sale. The secretary shall thereupon give notice to the remaining shareholders. Within three days after receipt of such notice, any shareholder desiring to purchase said shares shall file his acceptance and election to purchase the same with the secretary. In the event more than one shareholder files an election to so purchase said shares, the shareholders so electing shall purchase such number of the shares offered for sale as are in the same proportion to the total number of the shares offered for sale, as the number of shares owned by each shareholder electing to so purchase bears to the total number owned by all of the shareholders electing to so purchase.

ARTICLE FOUR

The number and class of shares to be issued before the corporation shall commence business, the consideration to be paid therefor and the capital with which the corporation will commence business are as follows:

No. of Shares	Class	Consideration to be paid	Par Value (or for shares without par value, show amount of consideration paid which will be capital)
Six	Common	\$800.00	\$600.00

The corporation will not commence business until consideration of the value of at least Five Hundred Dollars has been received for the issuance of shares.

ARTICLE FIVE

The name and place of residence of each incorporator is as follows:

Name	Street	City
Robert W. Moffet	Rural Route 2,	Granby, Missouri 64844
Orval K. Taylor, Jr.	Rural Route 5,	Neosho, Missouri 64850

ARTICLE SIX

The number of directors to constitute the board of directors is Two

ARTICLE SEVEN

The duration of the corporation is Perpetual

ARTICLE EIGHT

The corporation is formed for the following purposes:

To engage in the processing of metals and metal products of all kinds and types by all means and methods, including chemical processes; to buy and sell, manufacture and deal in all kinds and types of metals, metal products, chemicals and related products; to buy and sell and manufacture all kinds and types of machinery, tools, and equipment for metal processing and the production and fabrication of metal products; to manufacture and produce all kinds and types of metal parts and products; to buy and sell, manufacture, process and deal in all kinds and types of plastics and plastic products; and to buy and sell and manufacture all kinds and types of machinery and component parts of machinery.

To engage in all kinds and types of laboratory work in the testing and analysis of all types of metals, fluids, chemicals, and other materials of all kinds, and in the development of chemicals, chemical processes, and related activities.

IN WITNESS WHEREOF, these Articles of Incorporation have been signed this 15th day
of September, 19 73

FILED AND CERTIFICATE OF
INCORPORATION ISSUED

SEP 17 1973

James J. [Signature]
Corporation Dept. SECRETARY OF STATE

Robert W. Moffett
Robert W. Moffett

Orval K. Taylor, Jr.
Orval K. Taylor, Jr.

STATE OF MISSOURI }
COUNTY OF BARRY } ss.

I, Alma H. Maus, a notary public,
do hereby certify that on the 15th day of September, 1973, personally appeared
before me, ROBERT W. MOFFET (and ORVAL K. TAYLOR, JR.),
who being by me first duly sworn, (severally) declared that ~~he is~~ (they are) the person(s) who signed the
foregoing document as incorporator(s), and that the statements therein contained are true.

Alma H. Maus
Notary Public

My commission expires Jan 20, 1976

FILED AND CERTIFICATE OF
INCORPORATION ISSUED
SEP 17 1973
James G. [Signature]
Corporation Dept. SECRETARY OF STATE

No...00164294.....



STATE of MISSOURI

JAMES C. KIRKPATRICK, Secretary of State

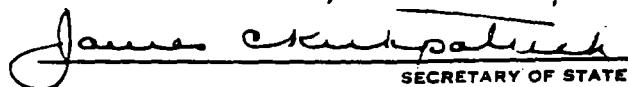
Corporation Department

Certificate of Rescission of Forfeiture

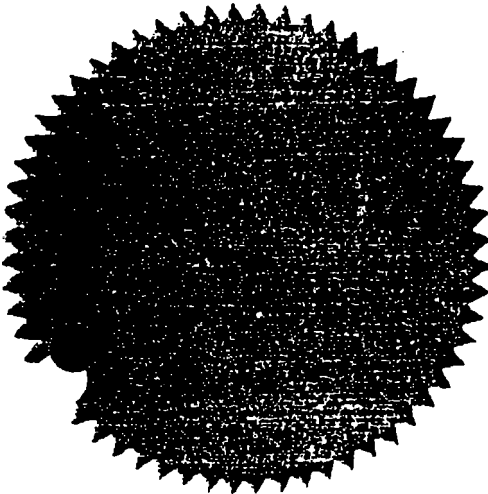
I, JAMES C. KIRKPATRICK, Secretary of State of the State of Missouri, hereby certify that
forfeiture of CHARTER entered against corporation No. 00164294,
R & O PROCESSORS, INC.

on the 1st day of January, 1975, as provided in The General and Business Corporation Law
was this day rescinded, and said corporation was on the date hereof restored to good standing
on the records of this office.

IN TESTIMONY WHEREOF, I, hereunto set my hand and affix
the GREAT SEAL of the State of Missouri. Done at the City of
Jefferson, this 22nd day of December,
Nineteen Hundred and Eighty.



SECRETARY OF STATE





Missouri Department of Revenue

Post Office Box 311

Jefferson City

65105

November 21, 1980

Joseph P. Teasdale
Comptroller

Robert W. Langley
Director

The First National Bank
Monett, MO 65708

Attention Willadean Bradford, Cashier

RE: Reinstatement of Corporation Rights of
R & O Processors Inc., 164294
under Section 351.540, RSMo.

Gentlemen:

Pursuant to the taxpayer's request, a review of the records of the above named taxpayer has been made. The summary review indicates no delinquency at this time with respect to any Missouri state taxes, including the filing of all required franchise tax reports and payments of all required franchise taxes, penalties and interest.

The taxpayer is advised that this letter is not to be construed as limiting the authority of the Director of Revenue to conduct audits or reviews of the taxpayer's records as provided by law and pursue collection of liabilities arising from these audits or review.

Also, please be advised that this letter does not constitute reinstatement of corporation status or rights. To be reinstated, this letter must be presented to the Missouri Secretary of State along with the required affidavit and any other information requested by the Office of the Secretary of State.

Very truly yours,

Robert W. Langley

Robert W. Langley
Director of Revenue

RWL:gs

**FORFEITURE OF CHARTER OR
AUTHORITY TO DO BUSINESS
FOR NONPAYMENT OF
FRANCHISE TAXES**

STATE of MISSOURI

JAMES C. KIRKPATRICK

Secretary of State

Corporation Division



00164294
R & O PROCESSORS, INC.
% Robert W. Moffet
Main and Church Streets
Granby, MO 64844

Whereas, Corporation No.

has failed to comply with the provisions of Sections 147.010, 147.020 and 147.030, Revised Statutes of Missouri, 1969, as amended (which provide for the filing and payment of annual corporate franchise taxes) as certified to this office by the Missouri Department of Revenue and Franchise Tax Department, and

Whereas, the certificate of said corporation stands forfeited this date as a matter of law under the provisions of Section 351.525, Revised Statutes of Missouri, 1969, due to the corporation's failure to pay its annual franchise tax as required;

Now, therefore, I, James C. Kirkpatrick, Secretary of State, do hereby declare the corporate rights, privileges and franchises heretofore conferred upon said corporation by the certificate are forfeited and canceled, subject to rescission as in this act provided.

IN TESTIMONY WHEREOF, I hereunto set my hand this 1st day of January, Nineteen Hundred and Seventy Five.

James C. Kirkpatrick

Secretary of State



STATE of MISSOURI

JAMES C. KIRKPATRICK, Secretary of State

CORPORATION DIVISION

APPLICATION FOR RESCINDING FORFEITURE

(To be submitted by an attorney)

HONORABLE JAMES C. KIRKPATRICK
SECRETARY OF STATE
STATE OF MISSOURI
JEFFERSON CITY, MO. 65101

WHEREAS, the charter of R & O Processors Inc

a corporation organized under the laws of _____ on the Seventeenth
day of September, 191973, was forfeited on the 31 day
of December, 1975 under the provisions of the General Business laws of Missouri, the
undersigned, the last President, hereby requests that such forfeiture
(President, Vice President, Secretary or Treasurer)
be rescinded and herewith submits the following affidavit, a fee of \$ Fifty, and such
(\$50.00 minimum)
reports or documentation as may be required by the office of the Secretary of State to rescind the forfeiture
pursuant to Section 351.540 RSMo 1969.

AFFIDAVIT

STATE OF Missouri
COUNTY OF Newton } ss

Robert W Meffet, on his oath, first being duly sworn,
states that he is the last President
(President, Vice President, Secretary or Treasurer)

of R & O Processors Inc, a _____ corporation;
that he is acting as one of and on behalf of the statutory trustees, that the trustees have caused the annual
registration, foreign affidavit or change of registered agent form to be duly prepared and submitted for fil-
ing herewith; that said corporation has not evaded or attempted to evade service of process issued from
any court of this State; that it has not attempted to conceal from the general public the location of its prin-
cipal place of business in this State, nor the address of its President or Secretary, so that the ordinary
process of law could not be served upon it; that it has paid to the Missouri Department of Revenue all
state taxes which it may owe.

Robert W Meffet
(The last President, Vice President, Secretary or Treasurer)

Subscribed and sworn to before me this 2nd day of December, 1980

My Commission expires October 10, 1981

Setty J King
(Notary Public)

**FORFEITURE OF CHARTER OR
AUTHORITY TO DO BUSINESS**

STATE of MISSOURI

JAMES C. KIRKPATRICK

Secretary of State

Corporation Division



**Whereas,
Corporation No.**

00164294 R & G PROCESSORS, INC.

ROBERT W. MOFFET
MAIN AND CHURCH STREET
GRANBY MO 64644

AG 0713984
PS 0813984 0917973

has failed to comply with the provisions of

- ☐ Sections 351.120 through 351.140, Revised Statutes of Missouri, requiring the annual registration by every corporation organized or licensed to do business under the laws of this state of its corporate name, registered office, registered agent, name and address of each of the officers and directors, and payment of annual registration fee;
- ☐ Sections 355.325-330 or 355.395, Revised Statutes of Missouri, requiring the annual registration by every general not for profit corporation organized or licensed under the laws of this state, of its corporate name, registered office, registered agent, name and address of each of the officers and directors, a statement of the character of affairs which it is actually conducting, and payment of annual registration fee;
- ☐ Sections 147.010, 147.020, and 147.040, Revised Statutes of Missouri, (1979 Supp.), as amended, which provides for the filing and payment of annual corporate franchise taxes as certified to this office by the Missouri Department of Revenue and Franchise Tax Department;
- ☐ Section 351.370, Revised Statutes of Missouri, 1978, which provides that each corporation shall have and continuously maintain a registered agent and registered office in the State of Missouri; and

WHEREAS, the certificate or License of said corporation stands canceled under the provisions of Sections 351.525 or 355.507 of the Revised Statutes of Missouri as of

AUGUST 12, 1984

NOW, THEREFORE, I, James C. Kirkpatrick, Secretary of State, do hereby declare the corporate rights, privileges and franchises heretofore conferred by this state upon said corporation forfeited and canceled, subject to rescission as in these acts provided.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix my seal this

AUGUST 7, 1984.

Secretary of State

INITIAL REGISTRATION REPORT



OFFICE OF SECRETARY OF STATE

JAMES C. KIRKPATRICK
Secretary of State

RECEIVED

OCT 18 1973

James C. Kirkpatrick
Corporation Dept. SECRETARY OF STATE

INFORMATION MUST BE TYPEWRITTEN
OR PRINTED
THIS REPORT TO BE FILED WITHIN
THIRTY DAYS FROM INCORPORATION

Corp. No. 164294

The name of the corporation is
R & O PROCESSORS, INC.

The address of its registered office in Missouri is:
Street & No. Main and Church Streets
City Granby, Missouri 64844

NAMES AND ADDRESSES (City and Street) OF OFFICERS:

Pres. Robert W. Moffet
Address Rural Route 2
City Granby 64844
V.-Pres. _____
Address _____
City _____
Sec'y. Orval K. Taylor, Jr.,
Address Route 5
City Neosho 64850
Treas. Orval K. Taylor, Jr.,
Address Rural Route 5
City Neosho 64850

State of MISSOURI
County of BARRY ss.

I, Robert W. Moffet, President, Vice-President, Secretary or Treasurer of said corporation, do solemnly swear that the above statement is true to the best of my knowledge and belief.

OFFICER
SIGN HERE

Subscribed and sworn to before me, this 28th day of

September

A. D. 19 7

WITNESS my hand and notarial seal the date last aforesaid.

NOTARY
SIGN HERE

(Seal)

(Commissioned and qualified for a term expiring

Notary Public
I certify that _____
Lawrence _____, the
County in which _____
My Commission expires 9-15-75

JAMES C. KIRKPATRICK, Secretary of State

INFORMATION MUST BE TYPEWRITTEN OR PRINTED

FILE EARLY — Avoid Increased Fees after July 31

State of MISSOURI } ss.
 County of Neosho

To the Secretary of the State of Missouri:

In compliance with the provisions of Sections 351.120, 351.135, and 351.525 of The General and Business Corporation Act of Missouri, the following affidavit is made and filed:

ANNUAL REGISTRATION REPORT

NAMES AND ADDRESSES (City and Street) OF OFFICERS:

Pres. Robert W. Moffet
 Address Rt. 2
 City Granby Missouri 64844
 V-Pres. _____
 Address _____
 City _____
 Sec'y. Orval K. Taylor Jr.
 Address Rt. 5 Box 94
 City Neosho Missouri 64850
 Treas. Orval K. Taylor
 Address Rt. 5 Box 94
 City Neosho Missouri 64850

NAMES AND ADDRESSES (City and Street) OF BOARD OF DIRECTORS:

Name Robert W. Moffett
 Address Rt. 2
 City Granby Missouri 64844
 Name Orval K. Taylor Jr.
 Address Rt. 5 Box 94
 City Neosho Missouri 64850
 Name _____
 Address _____
 City _____
 Name _____
 Address _____
 City _____
 Name _____
 Address _____
 City _____

The name of the corporation, its registered agent and the address of its registered office in Missouri is:

DO NOT CHANGE THIS IMPRESSION—IF THE CORPORATION WANTS TO CHANGE ITS REGISTERED AGENT OF OFFICE, IT MUST FILE A STATEMENT OF CHANGE WITH THE SECRETARY OF STATE'S OFFICE. FORMS ARE AVAILABLE UPON REQUEST, AT NO CHARGE.

JUL164294

R & C PROCESSORS INC
 & ROBERT W MOFFET
 MAIN & CHURCH STS
 GRANBY

MO 64844

ANTI-TRUST AFFIDAVIT

State of _____ } ss.
 County of _____

I, _____ (Name) do solemnly swear that I am the _____ (President, Vice-President, Secretary or Treasurer) of the corporation known and styled _____, duly incorporated under the laws of _____

and now transacting or conducting business in the State of Missouri, and that I am duly authorized to represent said corporation in the making of this affidavit.

And I do further swear that the said _____ known and styled as aforesaid, is not now, and has not at any time within one year from the date of this affidavit, created, entered into, become a member of, or participated in any pool, trust, agreement, combination, confederation, or understanding with any other corporation, partnership, individual, or any other person or association of persons, to regulate or fix the price of any article of manufacture, merchandise, commodity, convenience, repair, any product of mining, or the price of anything whatsoever, or the price or premium to be paid for sharing property against loss or damage by fire, lightning or storm, and that it has not entered into or become a member of or a party to any pool, trust, agreement, contract, combination or confederation to fix or limit the amount or quantity of any article of manufacture, merchandise, commodity, convenience, repair, any product of mining, or any article of thing whatsoever, or the price or premium to be paid for insuring property against loss or damage by fire, lightning or storm, and that it has not issued and does not own any trust certificates, and for any corporation, agent, officer or employee, or for the directors or stockholders of any corporation, has not entered into and is not now in any combination, contract or agreement with any person or persons, corporation, or corporations, or with any stockholder or director thereof, the purpose and effect of which said combination, contract or agreement would be to place the management or control of such combination or combinations, or the manufactured product thereof, in the hands of any trustee or trustees, with the intent to limit or fix the price or lessen the production and sale of any article, product or commodity in this State, or under the terms of which it is proposed, stipulated, provided, agreed or understood that any particular or specified article, product or commodity shall be dealt in, sold or offered for sale in this State, to the exclusion, in whole or in part, of any competing article, product or commodity, providing that nothing in this affidavit shall be interpreted as interfering with any corporation's right to Fair Trade products in any other state or any place where such practice is legal. And I do further swear that the statements contained in the above Annual Registration Report and this Affidavit are true to the best of my knowledge and belief.

OFFICER SIGN HERE

Robert W. Moffet
 (President, Vice-President, Secretary or Treasurer)

Subscribed and sworn to before me, a notary public.

within and for the county of Newton

27th day of Sept.

1974

My term expires 9/9/75

10

(Seal)

NOTARY SIGN HERE

Paul M. Deely
 Notary Public

REGISTRATION FEES—The total fee for filing Annual Registration Report and Anti-Trust Affidavit by July 31 is \$10.00; total fee for filing reports in August, \$15.00; total fee for filing reports in September, \$25.00; total fee for filing reports in October, \$30.00; total fee for filing reports in November, \$35.00; total fee for filing reports in December, \$40.00.

FAILURE TO FILE THE ABOVE REPORTS ON OR BEFORE DECEMBER 31ST WILL RESULT IN FORFEITURE OF CHARTER

1975

1976X

DOMESTIC CORPORATIONS

JAMES C. KIRKPATRICK, Secretary of State

INFORMATION MUST BE TYPEWRITTEN OR PRINTED

The name of the corporation, its registered agent and the address of its registered office in Missouri is:

00164294
R & O PROCESSORS, INC.
% Robert W. Moffet
Main and Church Streets
Granby, MO 64844

DO NOT CHANGE THIS IMPRESSION—IF THE CORPORATION WANTS TO CHANGE ITS REGISTERED AGENT OR OFFICE, IT MUST FILE A STATEMENT OF CHANGE WITH THE SECRETARY OF STATE'S OFFICE. FORMS ARE AVAILABLE UPON REQUEST, AT NO CHARGE.

FILE EARLY — Avoid Increased Fees after July 31

State of Missouri }
County of Newton } ss.

To the Secretary of the State of Missouri:

In compliance with the provisions of Sections 351.120, 351.140, and 351.525 of The General and Business Corporation Act of Missouri, the following affidavit is made and filed:

ANNUAL REGISTRATION REPORT

NAMES AND ADDRESSES (City and Street) OF OFFICERS:

Robert W. Moffet
Address Rural Route 2
City Granby, Missouri 64844

Pauline Moffet
Address Rural Route 2
City Granby, Missouri 64844

Pauline Moffet
Address Rural Route 2
City Granby, Missouri 64844

NAMES AND ADDRESSES (City and Street) OF BOARD OF DIRECTORS:

Robert W. Moffet
Name Robert W. Moffet
Address R.R. # 2
City Granby, Mo 64844

Name _____
Address _____
City _____

Name _____
Address _____
City _____

Name _____
Address _____
City _____

Name _____
Address _____
City _____

OFFICER SIGN HERE ☒ Robert W. Moffet

(President, Vice-President, Secretary, Asst. Secretary, Treasurer or Asst. Treasurer)

Subscribed and sworn to before me, a Notary Public within and for the county of Barry, this 2nd day of December, 1980. My term expires October 10, 1981.

(Seal)

NOTARY SIGN HERE ☒ Betty J. King

Notary Public

REGISTRATION FEES—The total fee for filing Annual Registration Report by July 31 is \$10.00; total fee for filing report in August, \$15.00; total fee for filing report in September, \$25.00; total fee for filing report in October, \$30.00; total fee for filing report in November, \$35.00; total fee for filing report in December, \$40.00.

FAILURE TO FILE THE ABOVE REPORT ON OR BEFORE DECEMBER 31ST WILL RESULT IN FORFEITURE OF CHARTER

RETURN THIS COPY TO SECRETARY OF STATE

James C. Kirkpatrick
SECRETARY OF STATE

1976

DOMESTIC CORPORATIONS

JAMES C. KIRKPATRICK, Secretary of State
INFORMATION MUST BE TYPEWRITTEN OR PRINTED

The name of the corporation, its registered agent and the address of its registered office in Missouri is:

00164294
R & O PROCESSORS, INC.
% Robert W. Moffet
Main and Church Streets
Granby, MO 64844

DO NOT CHANGE THIS IMPRESSION—IF THE CORPORATION WANTS TO CHANGE ITS REGISTERED AGENT OR OFFICE, IT MUST FILE A STATEMENT OF CHANGE WITH THE SECRETARY OF STATE'S OFFICE. FORMS ARE AVAILABLE UPON REQUEST, AT NO CHARGE.

FILE EARLY — Avoid Increased Fees after July 31

State of Missouri }
County of Newton } SS.

To the Secretary of the State of Missouri:

In compliance with the provisions of Sections 351.120, 351.140, and 351.325 of The General and Business Corporation Act of Missouri, the following affidavit is made and filed:

ANNUAL REGISTRATION REPORT

NAMES AND ADDRESSES (City and Street) OF OFFICERS:

Pres. Robert W. Moffet
Address Rural Route 2
City Granby, Missouri 64844
V-Pres. _____
Address _____
City _____
Sec'y. Pauline Moffet
Address Rural Route 2
City Granby, Missouri 64844
Treas. Pauline Moffet
Address Rural Route 2
City Granby, Missouri 64844

NAMES AND ADDRESSES (City and Street) OF BOARD OF DIRECTORS:

Name ROBERT W. MOFFET
Address R.R. # 2
City GRANBY, Mo. 64844
Name _____
Address _____
City _____
Name _____
Address _____
City _____
Name _____
Address _____
City _____
Name _____
Address _____
City _____

OFFICER SIGN HERE ☒

(President, Vice-President, Secretary, Asst. Secretary, Treasurer, or Asst. Treasurer)

Subscribed and sworn to before me, a Notary Public within and for the county of Barry, this

2nd day of December, 1980. My term expires October 10, 1981.

(Seal)

NOTARY SIGN HERE ☒

Notary Public

REGISTRATION FEES—The total fee for filing Annual Registration Report by July 31 is \$10.00; total fee for filing report in August, \$15.00; total fee for filing report in September, \$25.00; total fee for filing report in October, \$30.00; total fee for filing report in November, \$35.00; total fee for filing report in December, \$40.00.

FAILURE TO FILE THE ABOVE REPORT ON OR BEFORE DECEMBER 31ST WILL RESULT IN FORFEITURE OF CHARTER

RETURN THIS COPY TO SECRETARY OF STATE

James C. Kirkpatrick

1977

XVII

DOMESTIC CORPORATIONS

JAMES C. KIRKPATRICK, Secretary of State

INFORMATION MUST BE TYPEWRITTEN OR PRINTED

The name of the corporation, its registered agent and the address of its registered office in Missouri is:

00164294
R & O PROCESSORS, INC.
% Robert W. Moffet
Main and Church Streets
Granby, MO 64844

DO NOT CHANGE THIS IMPRESSION—IF THE CORPORATION WANTS TO CHANGE ITS REGISTERED AGENT OR OFFICE, IT MUST FILE A STATEMENT OF CHANGE WITH THE SECRETARY OF STATE'S OFFICE. FORMS ARE AVAILABLE UPON REQUEST, AT NO CHARGE.

FILE EARLY — Avoid Increased Fees after July 31

State of Missouri
County of Newton } SS.

To the Secretary of the State of Missouri:

In compliance with the provisions of Sections 351.120, 351.140, and 351.325 of The General and Business Corporation Act of Missouri, the following affidavit is made and filed:

ANNUAL REGISTRATION REPORT

NAMES AND ADDRESSES (City and Street) OF OFFICERS:

Pres. Robert W. Moffet
Address Rural Route 2
City Granby, Missouri 64844
V. Pres. _____
Address _____
City _____
Sec'y. Pauline Moffet
Address Rural Route 2
City Granby, Missouri 64844
Treas. Pauline Moffet
Address Rural Route 2
City Granby, Missouri 64844

NAMES AND ADDRESSES (City and Street) OF BOARD OF DIRECTORS:

Name ROBERT W. MOFFET
Address R.R. 2
City GRANBY, MO.
Name _____
Address _____
City _____
Name _____
Address _____
City _____
Name _____
Address _____
City _____

OFFICER SIGN HERE

(President, Vice-President, Secretary, Asst. Secretary, Treasurer or Asst. Treasurer)

Subscribed and sworn to before me, a Notary Public within and for the county of Barry, this 2nd day of December, 19 80. My term expires October 10, 19 81.

(Seal)

NOTARY SIGN HERE

Notary Public

REGISTRATION FEES—The total fee for filing Annual Registration Report by July 31 is \$10.00; total fee for filing report in August, \$15.00; total fee for filing report in September, \$25.00; total fee for filing report in October, \$30.00; total fee for filing report in November, \$35.00; total fee for filing report in December, \$40.00.

FAILURE TO FILE THE ABOVE REPORT ON OR BEFORE DECEMBER 31ST WILL RESULT IN FORFEITURE OF CHARTER

RETURN THIS COPY TO SECRETARY OF STATE

James C. Kirkpatrick
SECRETARY OF STATE

1978
1978

DOMESTIC CORPORATIONS

JAMES C. KIRKPATRICK, Secretary of State
INFORMATION MUST BE TYPEWRITTEN OR PRINTED

The name of the corporation, its registered agent and the address of its registered office in Missouri is:

00164294
R & O PROCESSORS, INC.
% Robert W. Moffet
Main and Church Streets
Granby, MO 64844

DO NOT CHANGE THIS IMPRESSION—IF THE CORPORATION WANTS TO CHANGE ITS REGISTERED AGENT OR OFFICE, IT MUST FILE A STATEMENT OF CHANGE WITH THE SECRETARY OF STATE'S OFFICE. FORMS ARE AVAILABLE UPON REQUEST, AT NO CHARGE.

FILE EARLY — Avoid Increased Fees after July 31

State of Missouri
County of Newton } ss.

To the Secretary of the State of Missouri:

In compliance with the provisions of Sections 351.120, 351.140, and 351.325 of The General and Business Corporation Act of Missouri, the following affidavit is made and filed:

ANNUAL REGISTRATION REPORT

NAMES AND ADDRESSES (City and Street) OF OFFICERS:

P. Robert W. Moffet
Address Rural Route 2
City Granby Mo 64844
V. Pres. _____
Address _____
City _____
Sec'y: Pauline Moffet
Address Rural Route 2
City Granby, Missouri 64844
Treas. Pauline Moffet
Address Rural Route 2
City Granby, Missouri 64844

NAMES AND ADDRESSES (City and Street) OF BOARD OF DIRECTORS:

Name Robert W. Moffet
Address _____
City _____
Name _____
Address _____
City _____
Name _____
Address _____
City _____
Name _____
Address _____
City _____

OFFICER SIGN HERE

(President, ~~Not President~~ Secretary, ~~Not Secretary~~)

Subscribed and sworn to before me, a Notary Public within and for the county of Barry, this 2nd day of December, 19 80. My term expires October 10, 19 81.

(Seal)

NOTARY SIGN HERE

Notary Public

REGISTRATION FEES—The total fee for filing Annual Registration Report by July 31 is \$10.00; total fee for filing report in August, \$15.00; total fee for filing report in September, \$25.00; total fee for filing report in October, \$30.00; total fee for filing report in November, \$35.00; total fee for filing report in December, \$40.00.

FAILURE TO FILE THE ABOVE REPORT ON OR BEFORE DECEMBER 31ST WILL RESULT IN FORFEITURE OF CHARTER

RETURN THIS COPY TO SECRETARY OF STATE

James C. Kirkpatrick
SECRETARY OF STATE

1979

1976x

DOMESTIC CORPORATIONS

JAMES C. KIRKPATRICK, Secretary of State

INFORMATION MUST BE TYPEWRITTEN OR PRINTED

The name of the corporation, its registered agent and the address of its registered office in Missouri is:

00164294
 R & O PROCESSORS, INC.
 % Robert W. Moffet
 Main and Church Streets
 Granby, Missouri

DO NOT CHANGE THIS IMPRESSION—IF THE CORPORATION WANTS TO CHANGE ITS REGISTERED AGENT OR OFFICE, IT MUST FILE A STATEMENT OF CHANGE WITH THE SECRETARY OF STATE'S OFFICE. FORMS ARE AVAILABLE UPON REQUEST. AT NO CHARGE.

FILE EARLY — Avoid Increased Fees after July 31

State of }
 County of } SS.

To the Secretary of the State of Missouri:

In compliance with the provisions of Sections 351.120, 351.140, and 351.325 of The General and Business Corporation Act of Missouri, the following affidavit is made and filed:

ANNUAL REGISTRATION REPORT

NAMES AND ADDRESSES (City and Street) OF OFFICERS:

Pres. Robert W. Moffet
 Address Rt 2 Box 77
 City Granby, Mo. 64844
 V-Pres.
 Address
 City
 Sec'y. Pauline Moffet
 Address Rt 2 Box 77
 City Granby Mo. 64844
 Treas. Pauline Moffet
 Address Rt 2 Box 77
 City Granby, Mo. 64844

NAMES AND ADDRESSES (City and Street) OF BOARD OF DIRECTORS:

Name
 Address
 City
 Name Pauline Moffet
 Address Rt 2 Box 77
 City Granby, Mo. 64844
 Name
 Address
 City
 Name
 Address
 City
 Name
 Address
 City

OFFICER SIGN HERE

(President, Vice-President, Secretary, Ass't. Secretary, Treasurer or Ass't. Treasurer)

Subscribed and sworn to before me, a Notary Public within and for the county of Larry, this
17th day of December, 1980. My term expires Oct 10, 1981.

(Seal)

NOTARY SIGN HERE

Betty J. King
Notary Public

REGISTRATION FEES—The total fee for filing Annual Registration Report by July 31 is \$10.00; total fee for filing report in August, \$15.00; total fee for filing report in September, \$25.00; total fee for filing report in October, \$30.00; total fee for filing report in November, \$35.00; total fee for filing report in December, \$40.00.

FAILURE TO FILE THE ABOVE REPORT ON OR BEFORE DECEMBER 31ST WILL RESULT IN FORFEITURE OF CHARTER

RETURN THIS COPY TO SECRETARY OF STATE

James C. Kirkpatrick
 SECRETARY OF STATE

INTERIM REGISTRATION REPORT



OFFICE OF SECRETARY OF STATE

JAMES C. KIRKPATRICK
Secretary of State

1980

RECEIVED

JAN 7 1981

James C. Kirkpatrick
CORPORATION DEPT. SECRETARY OF STATE

INFORMATION MUST BE TYPEWRITTEN
OR PRINTED
THIS REPORT TO BE FILED WITHIN
THIRTY DAYS

Corp. No. 00164294
The name of the corporation is R & O Processors Inc

The address of its registered office in Missouri is:

Street & No. Main & Church Sts.
City Granby

NAMES AND ADDRESSES (City and Street) OF OFFICERS:

Pres. Robert W. Moffet
Address Rt 2
City Granby, Missouri 64844

V.-Pres. _____
Address _____
City _____

Address Rt 2
City Granby Missouri 64844

Treas. _____
Address _____
City _____

State of Missouri
County of Barry

I, Robert W. Moffet, President, Vice President, Secretary or Treasurer of said corporation,
do solemnly swear that the above statement is true to the best of my knowledge and belief.

Subscribed and sworn to before me, this 5th day of January, A. D. 1981

WITNESS my hand and notarial seal the date last aforesaid.
(Seal) NOTARY SIGN HERE Betty J. King Betty J. King Notary Public
(Commissioned and qualified for a term expiring 10/10/81)

1981

TV

PROFIT CORPORATIONS

JAMES C. KIRKPATRICK, Secretary of State**INFORMATION MUST BE TYPEWRITTEN OR PRINTED****READ INSTRUCTIONS ON BACK BEFORE COMPLETING THIS FORM**

The name of the corporation, its registered agent and the address of its registered office in Missouri is:

DO NOT CHANGE THIS IMPRESSION — IF THE CORPORATION WANTS TO CHANGE ITS REGISTERED AGENT OR OFFICE, IT MUST FILE A STATEMENT OF CHANGE WITH THE SECRETARY OF STATE'S OFFICE. FORMS ARE AVAILABLE UPON REQUEST.

00164294 R & O PROCESSORS, INC.

2 ROBERT W. MOFFET
MAIN AND CHURCH STREET
GRANBY MO 64844FS 0101975
AR 1222980 0917973**FILE EARLY** — Avoid Increased Fees after July 31

State of _____

To the Secretary of the State of Missouri:

In compliance with the provisions of Sections 351.120, 351.140, and 351.525 of The General and Business Corporation Act of Missouri, the following affidavit is made and filed:

ANNUAL REGISTRATION REPORTNAMES AND ADDRESSES (City and Street) OF OFFICERS:
(YOU MUST LIST AT LEAST A PRESIDENT - SECRETARY)

Pres. **Robert W Moffet**
Address **Rt 2 Box 77**
City **Granby**

V-Pres. _____
Address _____
City _____

Sec'y. **Pauline Moffet**
Address **Rt 2 Box 77**
City **Granby**

Treas. _____
Address _____
City _____

NAMES AND ADDRESSES (City and Street) OF BOARD OF DIRECTORS:
(YOU MUST LIST AT LEAST ONE DIRECTOR)

Name **Robert W Moffet**
Address **Rt 2, Box 77**
City **Granby, Mo 64844**

Name _____
Address _____
City _____

Name _____
Address _____
City _____

Name _____
Address _____
City _____

Name _____
Address _____
City _____

OFFICER SIGN HERE

(President, Vice-President, Secretary, Ass't. Secretary, Treasurer or Ass't. Treasurer)

Subscribed and sworn to before me, a Notary Public within and for the county of **Newton** this **22nd** day of **May** 19 **81** My term expires **12-7** 19 **84**

(Seal)

NOTARY SIGN HERE

Notary Public

REGISTRATION FEES—The total fee for filing Annual Registration Report by July 31 is \$10.00; total fee for filing report in August, \$15.00; total fee for filing report in September, \$25.00; total fee for filing report in October, \$30.00; total fee for filing report in November, \$35.00; total fee for filing report in December, \$40.00.

FAILURE TO FILE THE ABOVE REPORT ON OR BEFORE THE LAST WORKING DAY IN DECEMBER WILL RESULT IN FORFEITURE OF CHARTER

James Kirkpatrick
SECRETARY OF STATE

PROFIT CORPORATIONS

JAMES C. KIRKPATRICK, Secretary of State

INFORMATION MUST BE TYPEWRITTEN OR PRINTED

READ INSTRUCTIONS ON BACK BEFORE COMPLETING THIS FORM

The name of the corporation, its registered agent and the address of its registered office in Missouri is:

DO NOT CHANGE THIS IMPRESSION — IF THE CORPORATION WANTS TO CHANGE ITS REGISTERED AGENT OR OFFICE, IT MUST FILE A STATEMENT OF CHANGE WITH THE SECRETARY OF STATE'S OFFICE. FORMS ARE AVAILABLE UPON REQUEST.

114794
00164294 R & O PROCESSORS, INC.

ROBERT W. MOFFET
1111 AND CHURCH STREET
GRANBY

FILE EARLY - Avoid Increased Fees after July 31

State of Missouri

County of Newton

SS.

To the Secretary of the State of Missouri:

In compliance with the provisions of Sections 351.120, 351.140, and 351.525 of The General and Business Corporation Act of Missouri, the following affidavit is made and filed:

ANNUAL REGISTRATION REPORT

NAMES AND ADDRESSES (City and Street) OF OFFICERS:
(YOU MUST LIST AT LEAST A PRESIDENT - SECRETARY)

Pres. Robert W. Moffet
Address Route 2, Box 77
City Granby
V-Pres. _____
Address _____
City _____
Sec'y. Pauline Moffet
Address Route 2, Box 77
City Granby
Treas. Pauline Moffet
Address Route 2, Box 77
City Granby

NAMES AND ADDRESSES (City and Street) OF BOARD OF DIRECTORS:
(YOU MUST LIST AT LEAST ONE DIRECTOR)

Name Robert W. Moffet
Address Route 2, Box 77
City Granby
Name Pauline Moffet
Address Route 2, Box 77
City Granby
Name _____
Address _____
City _____
Name _____
Address _____
City _____
Name _____
Address _____
City _____

OFFICER SIGN HERE

(President, Vice-President, Secretary, Ass't. Secretary, Treasurer or Asst. Treasurer)

Subscribed and sworn to before me, a Notary Public within and for the county of Newton, this

23rd day of May, 1983 My term expires 12-7 1984

(Seal)

NOTARY SIGN HERE

Notary Public

REGISTRATION FEES—The total fee for filing Annual Registration Report by July 31 is \$10.00; total fee for filing report in August, \$15.00; total fee for filing report in September, \$25.00; total fee for filing report in October, \$30.00; total fee for filing report in November, \$35.00; total fee for filing report in December, \$40.00.

FAILURE TO FILE THE ABOVE REPORT ON OR BEFORE THE LAST WORKING DAY IN DECEMBER WILL RESULT IN FORFEITURE OF CHARTER

PROFIT CORPORATIONS

JAMES C. KIRKPATRICK, Secretary of State

INFORMATION MUST BE TYPEWRITTEN OR PRINTED

READ INSTRUCTIONS ON BACK BEFORE COMPLETING THIS FORM

The name of the corporation, its registered agent and the address of its registered office in Missouri is:

DO NOT CHANGE THIS IMPRESSION — IF THE CORPORATION WANTS TO CHANGE ITS REGISTERED AGENT OR OFFICE, IT MUST FILE A STATEMENT OF CHANGE WITH THE SECRETARY OF STATE'S OFFICE. FORMS ARE AVAILABLE UPON REQUEST.

State of Missouri **FILE EARLY - Avoid Increased Fees after July 31**
County of Newton } ss.

To the Secretary of the State of Missouri:

In compliance with the provisions of Sections 351.120, 351.140, and 351.525 of The General and Business Corporation Act of Missouri, the following affidavit is made and filed:

ANNUAL REGISTRATION REPORT

NAMES AND ADDRESSES (City and Street) OF OFFICERS:
(YOU MUST LIST AT LEAST A PRESIDENT - SECRETARY)

Pres. Robert W. Moffet
Address Rt 2 Box 77
City Granby, Missouri 64844
V-Pres. _____
Address _____
City _____
Sec'y Pauline Moffet
Address Rt 2 Box 77
City Granby Missouri 64844
Treas. _____
Address _____
City _____

NAMES AND ADDRESSES (City and Street) OF BOARD OF DIRECTORS:
(YOU MUST LIST AT LEAST ONE DIRECTOR)

Name Robert W. Moffet
Address Rt 2 Box 77
City Granby Missouri 64844
Name _____
Address _____
City _____
Name _____
Address _____
City _____
Name _____
Address _____
City _____

OFFICER SIGN HERE

(President, Vice-President, Secretary, Ass't. Secretary, Treasurer or Ass't. Treasurer)

Subscribed and sworn to before me, a Notary Public within and for the county of Newton, this 7th day of June, 19 82 My term expires 9-14-82 19

(Seal)

NOTARY SIGN HERE

Notary Public

REGISTRATION FEES—The total fee for filing Annual Registration Report by July 31 is \$10.00; total fee for filing report in August, \$15.00; total fee for filing report in September, \$25.00; total fee for filing report in October, \$30.00; total fee for filing report in November, \$35.00; total fee for filing report in December, \$40.00.

FAILURE TO FILE THE ABOVE REPORT ON OR BEFORE THE LAST WORKING DAY IN DECEMBER WILL RESULT IN FORFEITURE OF CHARTER

JUN 11 1982

PROFIT CORPORATIONS

JAMES C. KIRKPATRICK, Secretary of State

INFORMATION MUST BE TYPEWRITTEN OR PRINTED

READ INSTRUCTIONS ON BACK BEFORE COMPLETING THIS FORM

The name of the corporation, its registered agent and the address of its registered office in Missouri is:

DO NOT CHANGE THIS IMPRESSION — IF THE CORPORATION WANTS TO CHANGE ITS REGISTERED AGENT OR OFFICE, IT MUST FILE A STATEMENT OF CHANGE WITH THE SECRETARY OF STATE'S OFFICE. FORMS ARE AVAILABLE UPON REQUEST.

164294 A & C PRECESSORS, INC.

ROBERT W. MOFFET
MAIN AND CHURCH STREET
GRANBY

434-

0600922
0525483 1917.7

State of Missouri

FILE EARLY - Avoid Increased Fees after July 31

County of Newton

SS.

To the Secretary of the State of Missouri:

In compliance with the provisions of Sections 351.120, 351.140, and 351.525 of The General and Business Corporation Act of Missouri, the following affidavit is made and filed:

ANNUAL REGISTRATION REPORT

NAMES AND ADDRESSES (City and Street) OF OFFICERS:
(YOU MUST LIST AT LEAST A PRESIDENT - SECRETARY)

Pres. Robert W. Moffet
Address Route 2, Box 77
City Granby
V-Pres.
Address
City
Sec'y. Pauline Moffet
Address Route 2, Box 77
City Granby
Treas. Pauline Moffet
Address Route 2, Box 77
City Granby

NAMES AND ADDRESSES (City and Street) OF BOARD OF DIRECTORS:
(YOU MUST LIST AT LEAST ONE DIRECTOR)

Name Robert W. Moffet
Address Route 2, Box 77
City Granby
Name Pauline Moffet
Address Route 2, Box 77
City Granby
Name
Address
City
Name
Address
City
Name
Address
City

OFFICER SIGN HERE

(President, Vice-President, Secretary, Ass't. Secretary, Treasurer or Ass't. Treasurer)

Subscribed and sworn to before me, a Notary Public within and for the county of

16th day of

July

19

My term expires

9-14

19

86

(Seal)

NOTARY SIGN HERE

Robert W. Moffet
Pauline Moffet

Notary Public

REGISTRATION FEES—The total fee for filing Annual Registration Report by July 31 is \$10.00; total fee for filing report in August, \$15.00; total fee for filing report in September, \$25.00; total fee for filing report in October, \$30.00; total fee for filing report in November, \$35.00; total fee for filing report in December, \$40.00.

FAILURE TO FILE THE ABOVE REPORT ON OR BEFORE THE LAST WORKING DAY IN DECEMBER WILL RESULT IN FORFEITURE OF CHARTER

ATTACHMENT G
Dunn and Bradstreet Report

REVIEW IN PROCESS. LATER REPORT WILL BE FORWARDED

Statement Date: SEP 30 1989

DUNS: 07-303-4324

& O PROCESSORS

DATE PRINTED

APR 26 1991

SUMMARY

RATING --

BOX 351
BRANBY MO 64844
WEST HWY 60
BRANBY MO 64844
TEL: 417 472-3943

CUSTOM PLATING
SIC NO.
34 71

STARTED 1973
PAYMENTS SEE BELOW
SALES \$200,000 (PROJ)
WORTH F \$(33,742)
EMPLOYS 4
HISTORY CLEAR
FINANCING SECURED
FINANCIAL
CONDITION UNBALANCED

ROBERT MOFFET, OWNER

SPECIAL EVENTS

06/20/90 On Jun 20 1990 Robert Moffet, owner, stated that the subject became a proprietorship in 1989.

PAYMENTS (Amounts may be rounded to nearest figure in prescribed ranges)						
REPORTED	PAYING RECORD	HIGH CREDIT	NOW OWES	PAST DUE	SELLING TERMS	LAST SALE WITHIN
02/91	Ppt	750	-0-	-0-		6-12 Mos
07/90	(002)	50	-0-	-0-		6-12 Mos
05/90	(003)	2500			Sales COD	6-12 Mos

* Each experience shown represents a separate account reported by a supplier. Updated trade experiences replace those previously reported.

FINANCE

A CONSULTING SERVICE IS AVAILABLE TO ASSIST YOU IN REVIEWING THIS ACCOUNT FURTHER. PLEASE CALL (800) 223 - 0141 TO SPEAK WITH A DUNS ACCOUNT CONSULTANT.

06/20/90

	Interim Mar 31 1989	Fiscal Sep 30 1989
Curr Assets	47,791	38,903
Curr Liabs	39,077	76,389
Current Ratio	1.22	.509
Working Capital	8,714	(37,486)
Other Assets	53,192	45,743
Worth	(18,242)	(33,742)
Sales	141,324	284,268
Net Profit (Loss)	1,784	(13,716)

Fiscal statement dated SEP 30 1989:

Cash	\$	268	Accts Pay	\$	27,699
Accts Rec		25,579	Notes Pay		48,690
Inventory		12,888	Loans & Adv-Princ		35,000
Other Curr Assets		168			
-----			-----		
Curr Assets		38,903	Curr Liabs		111,389
Fixt & Equip		42,743	Mortgages		7,000
Real Estate		3,000	EQUITY		(33,742)
-----			-----		
Total Assets		84,646	Total		84,646

From OCT 01 1988 to SEP 30 1989 sales \$284,268; cost of goods sold \$111,165. Gross profit \$173,103; operating expenses \$186,819. Operating income \$(13,716). (net loss) \$13,716.

Fire insurance on mdse & fixt & bldg \$125,000. At replacement cost.

Submitted JUN 20 1990 by Robert Moffet, owner. Extent of audit, if any, not indicated.

--0--

Notes payable are due to bank. Fixtures and equipment includes real estate.

On JUN 20 1990 Robert Moffet, owner, submitted the above figures. He submitted the following partial estimates dated JUN 20 1990:

Cash	\$	1,000	Accts Pay	\$	8,000
Accts Rec		20,000	Notes Pay		48,000
Mdse		7,500			
Fixed Assets		160,000			

Projected annual sales are \$ 200,000.

PUBLIC FILINGS

The following data is for information purposes only and is not the official record. Certified copies can only be obtained from the official source.

* * * UCC FILING(S) * * *

COLLATERAL: Inventory - general intangibles and proceeds - Specified Accounts receivable - Equipment - Fixtures

FILING NO: 1257677

DATE FILED: 11/01/1985

TYPE: Original

FILED WITH: SECRETARY OF
STATE/UCC DIVISION,
MO

SEC. PARTY: FIRST NATL MERCANTILE BK,
MONETT, MO

DEBTOR: R & O PROCESSORS INC

COLLATERAL: Specified Account(s) including proceeds and products - Specified Accounts receivable including proceeds and products - Specified Contract rights including proceeds and products - Specified Chattel paper including proceeds and products - Specified Equipment including proceeds and products

FILING NO: 1875557

DATE FILED: 05/30/1990

TYPE: Original

RECEIVED BY D&B: 06/06/1990

R & O PROCESSORS

APR 26 1991

PAGE 003

SEC. PARTY: MERCANTILE BANK NA, MONETT, MO
DEBTOR: R & O PROCESSORS INC

FILED WITH: SECRETARY OF
STATE/UCC DIVISION,
MO

COLLATERAL: Specified Industrial equipment/machinery and proceeds

FILING NO: 1772945

DATE FILED: 08/31/1989

TYPE: Original

FILED WITH: SECRETARY OF
STATE/UCC DIVISION,
MO

SEC. PARTY: MEDLEY MATERIAL HANDLING INC,
TULSA, OK

ASSIGNEE: EATON CORPORATION, CLEVELAND,
OH

DEBTOR: R & O PROCESSORS INC

FILING NO: 1940717

TYPE: Continuation

DATE FILED: 12/03/1990

SEC. PARTY: MERCANTILE BANK NA, MONETT, MO

RECEIVED BY D&B: 12/13/1990

DEBTOR: R & O PROCESSORS INC

ORIG. UCC FILED: 05/29/1981

ORIG. FILING NO: 802378

FILED WITH: SECRETARY OF
STATE/UCC DIVISION,
MO

FILING NO: 1715108

TYPE: Continuation

DATE FILED: 03/31/1989

SEC. PARTY: MERCANTILE FIRST NATIONAL BANK,
MONETT, MO

ORIG. UCC FILED: 04/30/1974

DEBTOR: R & O PROCESSORS INC

ORIG. FILING NO: 337637

FILED WITH: SECRETARY OF
STATE/UCC DIVISION,
MO

FILING NO: 1299259

TYPE: Continuation

DATE FILED: 03/03/1986

SEC. PARTY: FIRST NATIONAL BANK, MONETT, MO

ORIG. UCC FILED: 08/23/1978

DEBTOR: R & O PROCESSORS INC

ORIG. FILING NO: 052981

FILED WITH: SECRETARY OF
STATE/UCC DIVISION,
MO

*** ADDITIONAL PUBLIC FILING INFORMATION ***

06/20/90

Records of the Small Business Administration show the SBA approved a loan to R & O Processing Inc in the amount of \$53,700. Loan approved Dec 1982.

The public record items reported above under "PUBLIC FILINGS" and "UCC FILINGS" may have been paid, terminated, vacated or released prior to the date this report was printed.

HISTORY
06/20/90

ROBERT MOFFET, OWNER

PAULINE MOFFET, BOOKKEEPER

Ownership acknowledged verbally by Robert Moffet, owner on JUN 20 1990. Incorporated in Missouri in 1973. Became a sole proprietorship in 1989.

Business started 1973 by Robert Moffet. Relocated 1981 from Main St.

ROBERT MOFFET born 1938 married. 1959 to 1965 employed by American Fixtures Company, Joplin, MO. 1965 to 1967 employed by Star Plating Co, Joplin, MO. 1967 to 1973 employed by G & R Industries, Purdy, MO.

PAULINE MOFFET born 1940 married. Wife of Robert. Inactive daily. Housewife, 1961 to present.

OPERATION

06/20/90

Custom plating of metal (100%).
Sells on net 30 day terms. Has 25 accounts. Sells to commercial concerns. Territory : 4 State Area.
Nonseasonal.

EMPLOYEES: 4 including owner.

FACILITIES: Owns 6,400 sq. ft. in one story masonry building in good condition.

LOCATION: Rural section on well traveled highway.
1st National Mercantile Bank, Monett, MO

04-26(369 /369)

00000

065 065

FULL DISPLAY COMPLETE

ATTACHMENT H
Listing of Federal Regulation Violations

FEDERAL REGULATION VIOLATIONS (MDNR)

1. Releases of hazardous waste to the environment not addresses. 40 CFR 265.15(c), 40 CFR 265.31, 40 CFR 265.194(c), 40 CFR 265.196
2. Storage of hazardous waste without a permit or interim status. 40 CFR 270.1(c) and 40 CFR 262.13
3. No waste analysis plan and no program of regular or routine waste analysis being conducted. 40 CFR 265.14(c)
4. No restricted access signs at entry to tank walkway or at doorway to Wastewater Treatment Room. 40 CFR 265.14(c)
5. Facility inspections are not adequate and not documented. 40 CFR 265.15 and 40 CFR 265.195(c)
6. No personnel training plan or documentation. 40 CFR 265.16
7. The tank storage area did not possess internal or external communication devices or spill control equipment. 40 CFR 265.32
8. No contingency plan of emergency procedures available at the time of the inspection. 40 CFR Part 265 Subpart D
9. No operating record for the facility. 40 CFR 265.73
10. No biennial reports filed by the facility. 40 CFR 265.75
11. No closure plan for the facility. 40 CFR 265.143
12. No financial assurance for closure of the facility. 40 CFR 265.147
13. No financial assurance of liability coverage for the facility. 40 CFR 265.147
14. Failure to have the condition of existing storage tanks assessed and documented by an independent registered professional engineer. 40 CFR 265.191

ATTACHMENT I
Joint Voluntary Petition Through MDNR

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI

In Re:

Robert Wayne Moffet S.S.# 487-38-7500
R & O Processors and
Pauline Moffet S.S.# 537-38-0002

R & O Processors

Date Filed:

Case No:

Debtors Judge:

CHAPTER 7

Attorney for Debtor: David P. Vandagriff

JOINT VOLUNTARY PETITION -- CHAPTER 7

1. Petitioners' mailing address is
DEBTOR: Rt.2 Box 2197, Granby, MO 64844 Newton County
SPOUSE: Rt.2 Box 2197, Granby, MO 64844
2. Petitioners have resided
within this district for the preceding 180 days, or for a longer portion of the
preceding 180 days than in any other district.
3. Petitioners are qualified to file this petition and are entitled to the benefits of
title 11, United States Code as voluntary debtors.
4. Petitioners are aware that they may proceed under chapter 7, 11, 12 or 13 of title 11,
United States Code, understand the relief available under each such chapter, and
choose to proceed under chapter 7 of such title.
5. A declaration in the form of Exhibit "B" is a part of this petition.

Wherefore, petitioners pray for relief in accordance with chapter 7 of title 11, United
States Code.

Signed:

Attorney for Petitioner: David P. Vandagriff (417) 235-3858
315A Broadway
P.O. Box 187 Monett, MO 65708

DECLARATION

We, Robert Wayne Moffet and Pauline Moffet, the petitioners named in the foregoing
petition, declare under penalty of perjury that the foregoing is true and correct.

Executed on: Dec. 5, 1990

Petitioner:

Petitioner:

SEP 24 1989

ATTORNEY GENERAL

IN THE
CIRCUIT COURT OF NEWTON COUNTY
STATE OF MISSOURI

STATE OF MISSOURI, ex rel. THE
MISSOURI DEPARTMENT OF NATURAL
RESOURCES, and the MISSOURI
HAZARDOUS WASTE COMMISSION,

Plaintiff,

v.

Case No. CV388-268CC

ROBERT W. MOFFETT, d/b/a
R & O PROCESSORS, INC.
West Highway 60
P.O. Box 351
Grandby, MO 64844,

Defendant.

SETTLEMENT AGREEMENT

The parties hereto having consented to the entry of this Settlement Agreement now therefore before the taking of any testimony and upon the pleadings, it is ORDERED, ADJUDGED and DECREED THAT;

An agreement is made this 29th day of August, 1989, between Robert W. Moffett, d/b/a R & O Processors, Inc., and the State of Missouri by and through William L. Webster, Attorney General of Missouri, and the Missouri Hazardous Waste Commission.

I. Jurisdiction

This court has jurisdiction of the subject matter herein and of the parties consenting hereto pursuant to the Missouri Hazardous Waste Management Law and regulations promulgated thereunder.

II. Benefit and Duty

The provisions of this Consent Judgement shall inure to the benefit of and shall be binding upon the parties to this action, their agents, servants, employees, successors and assigns. In addition, the provisions of this Settlement Agreement shall apply to all persons, firms, corporations and other entities who are or will be acting in concert and in privity with or on behalf of the parties to this action or their agents, servants, employees and successors.

III. Background

R & O Processors, Inc., located in Grandby, Missouri, is a metal finishing business owned and operated by Robert W. Moffett. On or about June 27, 1985, the Missouri Department of Natural Resources personnel responded to a request for assistance involving the possible release of hazardous materials at the R & O Main and Church Streets abandoned business locations. Subsequently on November 26, 1985, a RCRA inspection of the facility revealed several violations including storage of hazardous waste without a permit or interim status and allowing cyanide contaminated wastewater, a listed hazardous waste to overflow from outside holding tanks onto the ground. A Notice of Violation was issued immediately. On May 27, 1986, an Abatement Order was issued to the company and on December 10, 1986, an amendment to said Abatement Order was issued. Neither the Order nor the Amendment was appealed and the company has taken no action to correct the violations cited therein. On

March 27, 1987, the matter was referred to the Office of the Attorney General for legal action. By letter sent on or about September 23, 1987, the Attorney General of Missouri advised the company that numerous violations, including failure to comply with the Abatement Order and the Amendment had been noted. [On October 4, 1988, the facility was again inspected by Missouri Department of Natural Resources personnel. The results of said inspection were transmitted to R & O Processors by letter dated November 18, 1988. The inspection disclosed both new and continuing violations.] The company was further advised that the State of Missouri was prepared to file suit against R & O Processors, Inc., but that the state would be willing to negotiate an amicable settlement. Subsequent to the receipt of this notice the parties engaged in settlement negotiations which culminated in the terms and conditions set forth in this Settlement Agreement.

IV. Purpose

The purpose of this agreement is to provide for the implementation of a schedule to correct the violations of the Missouri Hazardous Waste Law and regulations occurring at the R & O Processing facilities.

V. Performance

The company shall cause the work to be completed in accordance with and within the time limits of the schedule set forth as follows:

1. Immediately cease discharge of any waste or wastewater to the outside storage tanks. Do not discharge any waste or wastewater to the outside tanks until MDNR's Waste Management Program provides an approval that such discharge will not violate the requirements of 40 CFR 265 Subpart J and 10 CSR 25-7.265(2)(J).

2. Within ninety (90) days of the date of this order, dispose of hazardous waste in containers, inside tanks, and outside tanks. Decontamination of the outside tanks should occur during the indicated period.

3. Within one hundred eighty (180) days of the date of this order, develop and submit a cleanup plan and schedule for: soil sampling and analysis which will identify the horizontal and vertical extent of all areas contaminated with cyanide or metals above background concentrations; excavation or other remediation of contaminated soil; and steps for final disposal (i.e., containerization, transportation, final disposition, etc.). Said schedule will make provision for submittal or reports to MDNR upon completion of each separate phase of the plan.

4. Upon MDNR's approval or modification as agreed by the parties of the plan and schedule noted in item three (3), implement the plan according to the approved schedule.

5. If MDNR determines that, based upon reports submitted pursuant to items three (3) and four (4) or upon MDNR's own investigations, evidence exists of a potential release to the groundwater, within 45 days of notification of said potential

release, the company shall develop and implement a groundwater monitoring plan and schedule and implement such plan and schedule upon MDNR approval, in compliance with 40 CFR 265 Subpart F.

6. Beginning immediately, comply with the statutory and regulatory requirements for generators of hazardous waste including, but not limited to, those noted in § 260.380, RSMo, and 10 CSR 25-5.262. In particular, since the company has generated or accumulated over 1000 kg of hazardous waste, in one month the company shall develop and implement a personnel training plan, a contingency plan, and emergency preparedness and prevention measures adequate to comply with 10 CSR 25-5.262(2) referenced to 40 CFR 265 Subparts C and D, and 40 CFR 265.16.

7. The time for compliance with any of the above actions may be extended by the agreement of the MDNR, upon submission of adequate justification.

VI. Stipulated Penalty

R & O Processors consents to and is herein fined Five Thousand Dollars (\$5,000.00), the payment of which is suspended upon the condition that R & O fully performs the conditions of this Agreement and does not violate the Missouri Hazardous Waste Management Law and regulations. Further violations of said law and regulations promulgated thereunder occurring subsequent to the date of this Agreement shall be punished by enforcing and executing said stipulated and suspended penalty at the rate of

five hundred dollars (\$500.00) per day of violation. The procedure for enforcing and executing the suspended penalty shall be as follows:

A. The State of Missouri, upon discovering any violation of R & O Processor's facility shall notify the Company by a Notice of Violation.

B. R & O Processors shall have twenty (20) days from the date of the Notice of Violation to determine whether to voluntarily pay five hundred dollars (\$500.00) for the violation. If the Company agrees to pay the penalty, it shall do so no later than thirty (30) days from the date of the Notice of Violation.

C. If R & O Processors determines that the alleged violation did not occur or is excused by an act of God, war, strike, riot or other catastrophe as enumerated in § 260.240.3, RSMo 1986, the company may elect to submit the dispute to the Missouri Hazardous Waste Commission for resolution. Failure to petition the Commission to resolve said dispute within twenty (20) days from the date of the Notice of Violation will be deemed an acceptance of the state's assessment and R & O Processors will pay the executed penalty of Five Hundred Dollar (\$500.00) per day of violation.

VI. Force Majeure

Any delay or failure of R & O Processors, Inc., in the performance of its obligations under this agreement shall be excused if, and to the extent caused by an act of God, war,

strike, riot or other catastrophe including, but not limited to, fire, flood, windstorm, inclement weather, explosions or court injunction or order and/or cause or causes beyond the reasonable control of the party affected provided that a prompt notice of such delay is given by such party to the other party and both of the parties hereto shall be diligent in attempting to remove such cause or causes. Performance of this Settlement Agreement shall be resumed upon removal or a cessation of the cause or causes for a suspension of performance.

VII. Amendment of Consent Judgment

This Consent Judgment may be modified or amended only by a writing executed by the company and the plaintiffs and approved by the Court.

VIII. Continued Jurisdiction

The Court retains jurisdiction of this suit for the purpose of making any order or decree which it may deem at any time to be necessary to carry out this agreement. Any disputes regarding the interpretation of this agreement may be submitted to this Court for resolution.


IX. Use of Judgment

This Consent Judgment constitutes a final settlement of all claims arising out of the alleged violations occurring at R & O Processors, Inc., up to and including the date this decree is entered. It and its extent cannot be affected by any act of God, war,

IN WITNESS WHEREOF, the parties consent to this agreement
by their duly authorized representatives.

AGREED:


WILLIAM L. WEBSTER, Attorney General

By 
THOMAS P. WILSON, Mo. Bar #31394
Assistant Attorney General

8th Floor, Broadway Building
P.O. Box 899
Jefferson City, MO 65102
(314) 751-8755

Attorney for Plaintiff

By 
ROBERT W. MOFFETT, d/b/a
R & O PROCESSORS, INC.

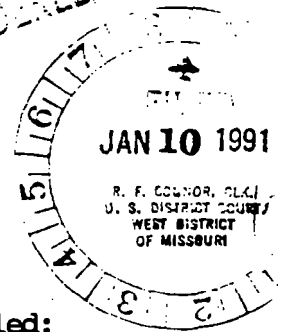

G. TRACY MEHAN, III
Director, Department of
Natural Resources

SO ORDERED.

Entered: 9/25/89


Circuit Court Judge

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI



In Re:

Robert Wayne Moffet S.S.# 487-38-7500

R & O Processors and

Pauline Moffet S.S.# 537-38-0002

R & O Processors

Date Filed:

Case No:

Debtors

Judge:

CHAPTER 7

Attorney for Debtor: David P. Vandagriff

91 30012 SW

JOINT VOLUNTARY PETITION -- CHAPTER 7

1. Petitioners' mailing address is
DEBTOR: Rt.2 Box 2197, Granby, MO 64844 Newton County
SPOUSE: Rt.2 Box 2197, Granby, MO 64844
2. Petitioners have resided
within this district for the preceding 180 days, or for a longer portion of the
preceding 180 days than in any other district.
3. Petitioners are qualified to file this petition and are entitled to the benefits of
title 11, United States Code as voluntary debtors.
4. Petitioners are aware that they may proceed under chapter 7, 11, 12 or 13 of title 11,
United States Code, understand the relief available under each such chapter, and
choose to proceed under chapter 7 of such title.
5. A declaration in the form of Exhibit "B" is a part of this petition.

Wherefore, petitioners pray for relief in accordance with chapter 7 of title 11, United
States Code.

Signed:

Attorney for Petitioner: David P. Vandagriff (417) 235-3858
315A Broadway
P.O. Box 187 Monett, MO 65708

DECLARATION

We, Robert Wayne Moffet and Pauline Moffet, the petitioners named in the foregoing
petition, declare under penalty of perjury that the foregoing is true and correct.

Executed on: Dec. 5, 1990

Petitioner: Robert Wayne Moffet

Petitioner: Pauline Moffet

Chapter 7 Petition

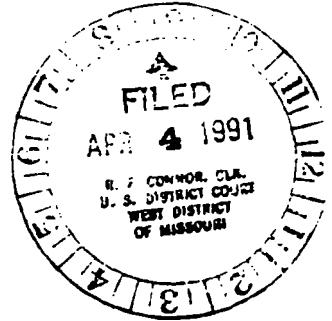
EXHIBIT "B"

I, David P. Vandagriff, the attorney for the petitioner named in the foregoing petition, declare that I have informed the petitioner that petitioner may proceed under chapter 7, 11, 12 or 13 of title 11, United States Code, and have explained the relief available under each such chapter.

Executed on: Dec. 5, 1990

Attorney: 

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHWESTERN DIVISION



In Re the Matter of:

ROBERT WAYNE MOFFET and
PAULINE MOFFET,

Debtors.

)
)
)
)
) Case No. 91-30012-SW

ABANDONMENT OF PROPERTY

Notice of the trustee's intent to abandon property having been given at the first meeting of creditors and no written objections having been received, the trustee hereby abandons the schedule of property, to wit:

All property on debtor's schedule B-1

Date: 4/2/91

J. Kevin Checkett
J. Kevin Checkett, #25838
ESTERLY & CHECKETT, P.C.
517 S. Main Street
P.O. Box 409
Carthage, Missouri 64836
(417)358-4049

CERTIFICATE OF SERVICE

The undersigned certified that a complete copy of the foregoing instrument was served upon Mr. John Reed, 620 S. Glenstone, Springfield, Missouri 65802, United States Trustee, 911 E. Walnut, Suite 806, Kansas City, Missouri, 64106, and David Vandagriff, P.O. Box 187, Monett, Missouri 65708, by enclosing same in envelope to said attorney at their business address as disclosed in the pleadings of record herein, with first class postage fully prepaid, and by depositing said envelopes in a U.S. Post Office mailbox in Carthage, Missouri, on the 2nd day of April, 1991, by the method checked above.

W. L. L. L.
Attorney of Record

ESTERLY & CHECKETT
517 S. MAIN ST.
CARTHAGE, MO 64836
(417) 358-4049

BE SURE NAME, BUSINESS AND
ADDRESS MATCH YOUR FILE.

ANSWERING
INQUIRY

SUBSCRIBER: [REDACTED]

THIS REPORT MAY NOT BE REPRODUCED IN WHOLE OR IN PART IN ANY MANNER WHATSOEVER

RATING CHANGE

DUNS: 07-303-4324
R & O PROCESSORS

DATE PRINTED
APR 30 1991

RATING NO
FORMERLY

BOX 351
GRANBY MO 64844
WEST HWY 60
GRANBY MO 64844
TEL: 417 472-3943

CUSTOM PLATING
SIC NO.
34 71

STARTED 1973
EMPLOYS 4

ROBERT MOFFET, OWNER

SPECIAL EVENTS

04/29/91 On Apr 29 1991 Pauline Moffet, bookkeeper, stated business discontinued operations as of Sept 1990 and there are no outstanding debts. Directory assistance has no current listing under business name. One supplier contacted stated account is no longer active and local utility company indicated business has not received service at address since Oct 1990. However, mailing address is still used for business and commercial banking account is still active.
04-30(9U7 /937) 00000 065 237

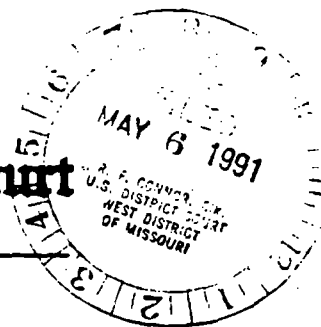
SEE REVERSE SIDE FOR GLOSSARY OF TERMS

United States Bankruptcy Court

WESTERN

District of

MISSOURI



In re ROBERT WAYNE MOFFET and
PAULINE MOFFET,

Bankruptcy Case No. 91-30012-SW-7-A

Debtor*

Social Security No. 478 38 7500
Employer Tax I.D. No. 537 38 0002

DISCHARGE OF JOINT DEBTORS

It appears that the persons named above have filed a petition commencing a joint case under title 11, United States Code on 1/10/91, that an order for relief was entered under chapter 7, and
(date)
that no complaint objecting to the discharge of the debtors was filed within the time fixed by the court [or
that a complaint objecting to discharge of one or both of the debtors was filed and, after due notice and
hearing, was not sustained].

IT IS ORDERED THAT:

1. The above-named debtors are released from all dischargeable debts.
2. Any judgment heretofore or hereafter obtained in any court other than this court is null and void as a determination of the personal liability of the debtors with respect to any of the following:
 - (a) debts dischargeable under 11 U.S.C. § 523;
 - (b) unless heretofore or hereafter determined by order of this court to be nondischargeable, debts alleged to be excepted from the discharge under clauses (2), (4) and (6) of 11 U.S.C. § 523 (a);
 - (c) debts determined by this court to be discharged.
3. All creditors whose debts are discharged by this order and all creditors whose judgments are declared null and void by paragraph 2 above are enjoined from instituting or continuing any action or employing any process or engaging in any act to collect such debts as personal liabilities of the above-named debtor.

MAY 06 1991

Date

Bankruptcy Judge

ARTHUR FEDERMAN

SIGNATURE STATE AUTHORITY

*Set forth all names, including trade names, used by the debtor within the last 6 years. (Bankruptcy Rule 1003). For joint debtors set forth both social security numbers.