



**TECHNICAL SOLUTIONS
NORTH AMERICA**

January 28, 2009

Ms. Melissa D. Woehle
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, FL 32502-5794

RE: Alternate Management Plan Report
Veolia ES Technical Solutions, L.L.C.
EPA ID #: FL0000207449

Dear Ms. Woehle:

This letter, along with the enclosed documents, is being submitted to provide the Florida Department of Environmental Protection (DEP) with an accounting of the actions taken by Veolia ES Technical Solutions, L.L.C. (Veolia) to comply with the Alternate Management Plan for the recovery and reclamation of elemental mercury. During the calendar year 2008, Veolia collected a total weight of 86 pounds of elemental mercury from Indian River Medical Center off-setting the quantity of mercury contained in the glass and aluminum shipped off-site in 2008 from Veolia's mercury recovery facility. A copy of the bill of lading and invoice are enclosed.

Also enclosed with this letter is a table listing the results of the weekly sample analysis, the 12 week rolling average and a table showing the calculations used to determine the required off-set. Based on these calculations, Veolia was required to off-set a total of 0.594 pounds of mercury for the calendar year.

By this letter Veolia is also notifying the DEP that we intend to continue to operate the Veolia Tallahassee facility under the existing alternate management plan during 2009.

If you have any questions, please call me at (262) 243-8908 or Linda Dunwoody at (850) 877-8299.

Sincerely,

A handwritten signature in black ink, appearing to read "Phillip Ditter".

Phillip Ditter, CHMM
Environmental Health and Safety Manager

Enc.

Cc: Linda Dunwoody

RECEIVED

JAN 29 2009

RECEIVED
DEP

Calculations to determine required mercury collection under alternate management plan

Glass

Year End Total Weight	2,271,640 pounds
Weekly Average Weight	44,542 pounds

Aluminum

Year End Total Weight	38,264 pounds
Weekly Average Weight	750 pounds

Glass

Weeks in Exceedence of 3 mg/kg	3 weeks
Average Exceedence	1.043 mg/kg

Aluminum

Weeks in Exceedence of 3 mg/kg	1 weeks
Average Exceedence	0.590 mg/kg

Glass

Weeks with Average in Exceedence of 1 mg/kg	34 weeks
Average Exceedence	0.300 mg/kg

Aluminum

Weeks with Average in Exceedence of 1 mg/kg	8 weeks
Average Exceedence	0.115 mg/kg

Mercury off-set required

Weekly Glass	0.1394 pounds
Rolling Average Glass	0.4536 pounds
Weekly Aluminum	0.0004 pounds
Rolling Average Aluminum	0.0007 pounds
Total	0.5942 pounds

RECEIVED

JAN 29 2009

NORTHWEST FLORIDA

Year	Week ending	Week	Aluminum	Entered	Verified	Notes	Rolling Average	Glass	Entered	Verified	Notes	Rolling Average
2008	1/5/2008	1	0.103	R	L		1.225	0.163	R	L		1.374
	1/12/2008	2	0.243	R	L		1.025	0.103	R	L		1.288
	1/19/2008	3	1.480	R	L		1.301	0.789	R	L	2008-1	1.146
	1/26/2008	4	3.590	R	L		1.157	0.417	R	L		1.287
	2/2/2008	5	0.836	R	L		1.080	0.304	R	L	2008-2	1.294
	2/9/2008	6	0.291	R	L		1.063	0.340	R	L		0.886
	2/16/2008	7	0.300	R	L		1.032	3.850	R	L		0.992
	2/23/2008	8	0.336	R	L		0.911	1.640	R	L		0.965
	3/1/2008	9	1.350	R			0.798	0.255	R			0.898
	3/8/2008	10	0.826	R	L		0.844	0.109	R	L		0.851
	3/15/2008	11	1.030	R	L		0.922	1.430	R	L		0.860
	3/22/2008	12	0.098	L	R	2008-3	0.874	0.499	L	R		0.825
	3/29/2008	13	0.223	R	L		0.884	2.960	R	L		1.058
	4/5/2008	14	0.100	L	R		0.872	0.504	L	R		1.091
	4/12/2008	15	2.990	L	R		1.035	0.224	R	L	2008-4	1.025
	4/19/2008	16	0.729	L	R		0.977	1.700	L	R		1.095
	4/26/2008	17	0.477	L	R		0.729	1.390	L	R		1.242
	5/3/2008	18	0.150	R	L		0.717	2.000	R	L		1.380
	5/10/2008	19	0.264	R	L		0.714	0.697	R	L		1.117
	5/17/2008	20	0.300	R	L		0.711	1.050	R	L		1.068
	5/24/2008	21	0.163	R	L		0.613	0.595	R	L		1.097
	5/31/2008	22	1.680	L	R		0.684	0.080	L	R		1.094
	6/7/2008	23	0.610	R	L	2008-5	0.649	1.240	R	L		1.078
	6/14/2008	24	0.000	R	L		0.641	0.580	R	L		1.085
	6/21/2008	25	0.677	R	L		0.678	2.680	R	L		1.062
2008	6/28/2008	26	0.792	L	R		0.736	1.040	L	R		1.106
	7/5/2008	27	0.169	R	L		0.501	0.678	R	L		1.144
	7/12/2008	28	0.584	L	R		0.489	0.614	L	R		1.054
	7/19/2008	29	0.272	L	R		0.472	0.662	L	R		0.993
	7/26/2008	30	0.579	R	L		0.508	0.521	R	L		0.870
	8/2/2008	31	1.860	R	L		0.641	0.373	R	L		0.843
	8/9/2008	32	0.665	R			0.671	2.260	R		2008-6	0.944
	8/16/2008	33	0.881	R	L		0.731	0.969	R	L	2008-7	0.975
	8/23/2008	34	0.634	R	L		0.644	0.473	R	L		1.008
	8/30/2008	35	0.391	L	R		0.625	0.098	L	R		0.912
	9/6/2008	36	0.314	R			0.652	0.255	R			0.885
	9/13/2008	37	0.215	R	L		0.613	0.845	R	L	2008-9	0.732
	9/20/2008	38	0.648	R			0.601	1.130	R			0.740
	9/27/2008	39	0.281	R	L		0.610	1.820	R	L		0.835
	10/4/2008	40	0.809	R		2008-10	0.629	1.370	R			0.898
	10/11/2008	41	0.267	R	L		0.629	2.700	R	L		1.068
	10/18/2008	42	0.652	R			0.635	1.550	R			1.154
	10/25/2008	43	0.044	R	L		0.483	1.490	R	L		1.247
	11/1/2008	44	2.400	L	R		0.628	0.717	L	R		1.118
	11/8/2008	45	0.468	R	L		0.594	2.860	R	L		1.276
	11/15/2008	46	0.060	R	L		0.546	0.755	R	L		1.299
	11/22/2008	47	0.311	R	L		0.539	2.540	R	L		1.503
	11/29/2008	48	0.673	R	L		0.569	4.090	R	L	2008-11	1.822
	12/6/2008	49	0.299	R	L		0.576	4.190	R	L	2008-12	2.101
	12/13/2008	50	0.730	R	L		0.583	1.340	R	L		2.119
	12/20/2008	51				2008-13	0.610				2008-13	2.146
	12/27/2008	52	0.254	R			0.560	1.330	R			2.142



ENVIRONMENTAL SERVICES

INVOICE

REMIT TO: Veolia ES Technical Solutions, L.L.C.
Electronics Recycling Division
28900 Network Place • Chicago, IL 60673-1289
Tel: 262 243 8900 • Fax: 262 284 3775 • Telex 36-4394814

Invoice No: EW370633
Sales Order: 387182

Page: 1
Invoice Date: 7/23/2008
Due Date: 8/22/2008

Order To: INDIAN RIVER MEDICAL CENTER
1300 36TH STREET

Ship To:

INDIAN RIVER MEDICAL CENTER
1300 36TH STREET

VERO BEACH, FL 32960

VERO BEACH, FL 32960

Contact/Phone: VIRGINIA MAZZOLA 772-567-4311 X2247

CREDIT CARDS ACCEPTED

ORDER DATE	CUSTOMER NUMBER	TERMS	SHIP VIA	CUSTOMER PURCHASE ORDER
6/25/2008	280400/1	1% 10, NET 30 DAYS		VIRGINIA CALLED IN
LINE	WS#/GENERATOR/DESCRIPTION/MANIFEST#/BOL#	ORDER QUANTITY	NET UNIT PRICE	EXTENDED PRICE

RECEIVED 7/8/08

1	374214 - INDIAN RIVER MEDICAL CENTER Recycle - Mercury Containing Articles - BOL387182	Pound	86.0000	\$0.0000	\$0.00
Register for FREE breaking environmental news from Veolia at http://veoliaes-ts.com/buzzsignupform				Total Amount	\$0.00



EW370633

0.60

Certificate of Recycling and/or Disposal

This certificate certifies that the waste described below has been properly recycled and/or disposed in accordance with state, federal and local regulations. The document number shown below should be used when inquiring about any issues with the proper handling, recycling and/or disposal of the waste.

CUSTOMER:

INDIAN RIVER MEDICAL CENTER
1300 36TH STREET

VERO BEACH, FL 32960

GENERATOR:

INDIAN RIVER MEDICAL CENTER
1300 36TH STREET

VERO BEACH, FL 32960

WASTE RECYCLED AND/OR DISPOSED:

Recycle - Mercury Containing Articles

Quantity

86.0

Unit of Measure

P

RECEIVED JUL 22 2008**FACILITY:****RECEIVED DATE:****SO#****DOCUMENT#:****SHIPPING PAPER:****VEOLIA ES TECHNICAL SOLUTIONS, L.L.C. TALLAHASSEE, FL 32305 FL0000207449****7/8/2008****387182****D357549****BOL387182****LINDA DUNWOODY****OPERATIONS MANAGER**

UNIVERSAL WASTE BILL OF LADING

Generator Name and Mailing Address INDIAN RIVER MEDICAL CENTER 1300 38TH STREET VERD BEACH, FL 32960		Location Address (if different) _____ _____ _____	BOL No. 116462 Doc. No. 0367549 SO No. 387182
Phone No. _____		PG No. _____	Emergency Contact 1-877-818-0087

Designated Facility, as checked below.

☐ Veolia ES Technical Solutions, L.L.C. 1275 Mineral Springs Drive Port Washington, WI 53074 (262) 243-8900 WID958550543	☐ Veolia ES Technical Solutions, L.L.C. 5736 West Jefferson Street Phoenix, AZ 85043 (602) 233-2955 AZ0000337380	☐ Veolia ES Technical Solutions, L.L.C. 230 Canton Street Stoughton, MA 02072 (701) 341-0080 MA5000004713	☒ Veolia ES Technical Solutions, L.L.C. 342 Marpan Lane Tallahassee, FL 32305 (904) 878-2259 FL0000207440
---	---	--	---

HM	Container		Total Qty		DOT Description	Common Name	Profilo Number	Discrepancy
	Count	Type	Cal	WT				
X	1	CM	82	P	RG Mercury contained in manufactured articles, 8, UN2809, PG II, ERG#172	Mercury Containing Articles (Refer to State Regulations)	32/214	
					RG Mercury, 8, UN2809, PG II, ERG#172	Mercury		
					RG Environmentally Hazardous Substance solid, n.o.s., 9, UN3077, PGIII (PCB), ERG#171	TSCA Exempt PCB Lamp Ballasts		
					Environmentally Hazardous Substance, solid, n.o.s., 9, NA3077, PGIII (Mercury), ERG#171	Mercury Batteries		
					Batteries, wet, nonspillable, electric storage, 8, UN2800, PGIII, ERG#154	Lead Acid Batteries - Sealed		
					Batteries, wet, filled with acid, 8, UN2704, PGIII, ERG#154	Lead Acid Batteries		
					Lithium Battery, 9, UN3090, PGII, ERG#138	Lithium Batteries		
					Batteries, wet filled with alkali, 8, UN2795, PGIII, ERG#154	NiCad Batteries - Wet		
					Batteries, dry, non-DOT regulated	NiCad Batteries - Dry		
					Batteries, dry, non-DOT regulated	Alkaline Batteries		
					Batteries, dry, non-DOT regulated	Mixed Batteries		
					Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Fluorescent Lamps 4' and under		
					Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Fluorescent Lamps 5' and over		
					Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Circular Tube Lamps		
					Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Compact Lamps		
					Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Shatterproof/Shielded		
					Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	HiD Lamps		
					Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Mercury Vapor/UV Lamps		
					Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Incandescent Lamps		
					Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Broken Lamps		
					Non-DOT Regulated Electronic Equipment for Recycling/Reuse/Remanufacture	Electronics		
					Non-DOT Regulated Ballasts for Recycling	Non PCB Light Ballasts		

Generator/Shipper's Certification:

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. All containers of waste are fully described above and are presumed to be full, unless the Generator has provided a detailed, verifiable breakdown of the wastes being picked up or delivered. Actual quantities will be determined upon receipt at the Designated Facility.

Signature

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

Transporter 1 Name:

Phone Number: 877-818-0087

Signature: *Carrie L. Brett* Date: 07-02-08

Signature

Date

Date

07-02-08

Transporter 2 Name:

Phone Number:

Signature

Date

Received, subject to the classifications and regulations in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted. Per 40 CFR 273.10(d), 40 CFR 273.38(d), and 40 CFR 284.12(b) the Designated Facility agrees to receive shipments of Universal Waste from the Generator.

Signature: *Pakiasha Walker*

Date: 7-8-08

Date

1ST TRANSPORTER

MCMA LOAD RECEIVING REPORT**LOAD #: 73334**DATE RECEIVED: 7-8-08RECEIVED BY: RW**GENERATOR:**INDIAN RIVER MEDICAL CENTER
1300 36TH STREET

SALES ORDER #:

387182

DOCUMENT #:

D357548

VERO BEACH, FL 32900
UW**TSDF:**

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

FL0000207449

PROFILE# 374214

MANIFEST/BOL & LINE NUMBER: BOL387182

PRODUCT# MC-MA

Recycle - Mercury Containing Articles

EPA WASTE CODE

STORAGE LOCATION: _____

No
D357548-1

Weight (P)

86

Cont. Type and Size

MC-MA

Material Description

Revised Date

Revised Date

OFFSITE SHIPMENT: _____

Note any other additional materials for approved by the office and recorded on a Discrepancy Form before signing manifests/BOLs