



TECHNICAL SOLUTIONS
NORTH AMERICA

February 26, 2010

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 2009, Veolia collected a total weight of 10 pounds of mercury devices with an estimated weight of 5 pounds of elemental mercury from Palmetto Hospital in Hialeah, Florida, off-setting the quantity of mercury contained in the glass and aluminum shipped off-site in 2009 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 1.029 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 2010.

If you have any questions, please call me at (602) 233-2955 or Linda Dunwoody at (850) 877-8299.

Sincerely,

Wayne Bulsiewicz
Environmental Health and Safety Manager

Enc.
Cc: Linda Dunwoody

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Year	Week ending	Week	Aluminum	Entered	Verified	Notes	Rolling Average	Glass	Entered	Verified	Notes	Rolling Average	Aluminum Weekly Exceedence	Glass Weekly Exceedence	Aluminum Rolling Average Exceedence	Glass Rolling Average Exceedence
2008	10/11/2008	41	0.267	R	L		0.629	2.700	R	L		1.068				
	10/18/2008	42	0.652	R	PD		0.635	1.550	R	PD		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	PD		0.560	1.330	R	PD		2.142				
2009	1/3/2009	1	2.18	R	PD		0.734	0.35	R	PD		1.928				0.93
	1/10/2009	2	0.928	R	PD		0.759	0.565	R	PD		1.839				0.84
	1/17/2009	3	1.42	R	PD		0.884	0.545	R	PD		1.753				0.75
	1/24/2009	4	2.36	R	PD		0.880	0.536	R	PD		1.736				0.74
	1/31/2009	5	0.572	R	PD	2009-2	0.890	2.07	R	PD		1.665				0.66
	2/7/2009	6	0.69	R	PD		0.947	0.657	R	PD	2009-3	1.656				0.66
	2/14/2009	7	0.303	R	PD		0.946	4.07	R	PD		1.795		1.07		0.79
	2/21/2009	8	0.43	R	PD		0.924	1.44	R	PD		1.554				0.55
	2/28/2009	9	0.189	R	PD		0.914	2.31	R	PD		1.383				0.38
	3/7/2009	10	0.301	R	PD		0.875	3.22	R	PD		1.554				0.55
	3/14/2009	11	2.24	R	PD		0.989	1.68	R	PD		1.564				0.56
	3/21/2009	12	0.134	R	PD		0.979	2.8	R	PD	2009-1	1.687				0.69
2009	3/28/2009	13	4.93	R	PD		1.208	2.07	R	PD		1.830	1.93		0.21	0.83
	4/4/2009	14	0.768	R	PD		1.195	1.62	R	PD	2009-4	1.918			0.19	0.92
	4/11/2009	15	0.58	R	PD		1.125	2.39	R	PD	2009-5	2.072			0.12	1.07
	4/18/2009	16	0.574	R	PD		0.976	1.64	R	PD		2.164				1.16
	4/25/2009	17	0.185	R	PD		0.944	1.52	R	PD		2.118				1.12
	5/2/2009	18	1.99	PD	R	2009-6	1.052	0.714	R	PD		2.123			0.06	1.12
	5/9/2009	19	0.767	R	PD		1.091	2.77	R	PD		2.015			0.09	1.01
	5/16/2009	20	1.22	R	PD		1.157	0.543	R	PD		1.940			0.16	0.94
	5/23/2009	21	2.65	R	PD		1.362	0.894	R	PD		1.822			0.36	0.82
	5/30/2009	22	1.52	PD	L		1.463	1.11	PD	L		1.646			0.46	0.65
	6/6/2009	23	1.57	R	L		1.407	1.51	R	L	2009-7	1.632			0.41	0.63
	6/13/2009	24	0.105	R	L		1.405	1.32	R	L		1.508			0.40	0.51
2009	6/20/2009	25	1.24	R	L		1.097	1.9	R	L		1.494			0.10	0.49
	6/27/2009	26	0.619	R	L	2009-8	1.085	1.66	R	L		1.498			0.09	0.50
	7/4/2009	27	0.749	R	L		1.099	1.2	R	L		1.398			0.10	0.40
	7/11/2009	28	6.1	R	L	2009-9	1.560	0.617	R	L		1.313	3.10		0.56	0.31
	7/18/2009	29	0.305	R	L		1.570	1.51	R	L		1.312			0.57	0.31
	7/25/2009	30	4.12	R	L		1.747	1.4	R	L		1.370	1.12		0.75	0.37
	8/1/2009	31	0.662	R	L		1.738	0.987	R	L		1.221			0.74	0.22
	8/8/2009	32	4.69	R	L		2.028	2.2	R	L	2009-10	1.359	1.69		1.03	0.36
	8/15/2009	33	1.11	R	L		1.899	1.77	R	L		1.432			0.90	0.43
	8/22/2009	34	0.39	R	L		1.805	1.44	R	L		1.460			0.81	0.46
	8/29/2009	35	4.64	R	L		2.061	1.98	R	L		1.499	1.64		1.06	0.50
	9/5/2009	36	0.829	R	L		2.121	1.56	R	L		1.519			1.12	0.52
2009	9/12/2009	37	1.38	R	L	2009-11	2.133	3.74	R	L		1.672	0.74		1.13	0.67
	9/19/2009	38	1.62	R	L	2009-12	2.216	0.32	R	L	2009-12	1.560			1.22	0.56
	9/26/2009	39	0.539	R	L		2.199	0.351	R	L		1.490			1.20	0.49
	10/3/2009	40	0.628	R	L	2009-13	1.743	1.28	R	L		1.545			0.74	0.54
	10/10/2009	41	3.07	R	L		1.973	0.586	R	L		1.468	0.07		0.97	0.47
	10/17/2009	42	0.523	R	L		1.673	0.256	R	L		1.373			0.67	0.37
	10/24/2009	43	1.08	R	PD		1.708	1.04	R	PD		1.377			0.71	0.38
	10/31/2009	44	4.77	R	PD	2009-14	1.715	0.448	R	PD		1.231	1.77		0.71	0.23
	11/7/2009	45	0.165	R	PD	2009-15	1.636	1.7	R	PD	2009-15	1.225			0.64	0.23
	11/14/2009	46	1.24	R	PD	2009-16	1.707	2.26	R	PD		1.293			0.71	0.29
	11/21/2009	47	1.04	R	PD		1.407	1.86	R	PD		1.283			0.41	0.28
	11/28/2009	48	3.53	R	PD		1.632	1.47	R	PD		1.276	0.53		0.63	0.28
2009	12/5/2009	49	3	R	PD		1.767	1.3	R	PD		1.073	0.00		0.77	0.07
	12/12/2009	50	0.685	R	PD		1.689	0.551	R	PD		1.092			0.69	0.09
	12/19/2009	51	0.0581	R	PD		1.649	0.278	R	PD		1.086			0.65	0.09
	12/26/2009	52	1.52	L	R		1.723	0.153	L	R		0.992			0.72	
	1/2/2010	53	0.202	PD			1.484	1.19	PD			1.042			0.48	0.04
								Weight Glass per week			33.346	Count	9	2	38	51
								Weight Aluminum per week			729	Average	1.32	0.91	0.60	0.56
												Excess Mercury	0.009	0.060	0.017	0.944
								Total Mercury to be recovered through alternate management					1.029 pounds			

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INVOICE

REMIT TO LOCK BOX:
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: EW399205
Sales Order: 430635

Page: 1
Invoice Date: 5/28/2009
Due Date: 6/27/2009

Order To: ESCRAP
2220 EAST 11TH AVENUE

Ship To: PALMETTO HOSPITAL
2001 W. 68TH STREET

HALEAH, FL 33013

HALEAH, FL 33016

Contact/Phone: GEORGE PERY 305-636-1911

CREDIT CARDS ACCEPTED

ORDER DATE	CUSTOMER NUMBER	TERMS	SHIP VIA	CUSTOMER PURCHASE ORDER
5/8/2009	265443/1	1% 10, NET 30 DAYS		
LINE	WS#/GENERATOR/DESCRIPTION/MANIFEST#/BOL#	ORDER QUANTITY	NET UNIT PRICE	EXTENDED PRICE

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1	410864 - PALMETTO HOSPITAL Recycle - Mercury Containing Articles - BOL430635	Drum	10.0000	\$0.0000	\$0.00
2	- 10% Security and Energy Surcharge -	Percent	0.0000	\$0.1000	\$0.00
3	- Per Drum Transport Rate -	Drum	0.0000	\$30.0000	\$0.00
4	- Minimum Charge for Services -	Stop	0.0000	\$-450.0000	\$0.00

Register for FREE breaking environmental news from
Veolia at <http://veoliaes-ts.com/buzzsignupform>

Total Amount \$0.00



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:

ESCRAP
2220 EAST 11TH AVENUE

HIALEAH, FL 33013

GENERATOR:

PALMETTO HOSPITAL
2001 W. 68TH STREET

HIALEAH, FL 33016

WASTE RECYCLED AND/OR DISPOSED:

	<u>Quantity</u>	<u>Unit of Measure</u>
Recycle - Mercury Containing Articles	10.0	P

FACILITY:**RECEIVED DATE:****SO#****DOCUMENT#:****SHIPPING PAPER:**

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C. TALLAHASSEE, FL 32305 FL0000207449
5/19/2009
430635
D449550
BOL430635



LINDA DUNWOODY

OPERATIONS MANAGER

MCMA LOAD RECEIVING REPORT**LOAD #:** 79420**DATE RECEIVED:**

5-19-09

RECEIVED BY:

Kenneth (Gavin)

GENERATOR:PALMETTO HOSPITAL
2001 W. 88TH STREETHIALEAH, FL 33016
00000000**SALES ORDER #**

430635

DOCUMENT #

D449550

TSDE:

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

FL0000207449

PROFILE# 410864**MANIFEST/BOL & LINE NUMBER:** BOL430635**PRODUCT#** MC-HG

Recycle - Mercury

EPA WASTE CODE D009**STORAGE LOCATION:** _____

<u>No</u>	<u>Weight (P)</u>	<u>Cont. Type and Size</u>	<u>Material Description</u>	<u>Retort Date</u>	<u>Repack No.</u>
D448550-1	10 #	MCMA (DF)			

OFFSITE SHIPMENT: _____

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