VEOLIA
ENVIRONMENTAL SERVICES

TECHNICAL SOLUTIONS
NORTH AMERICA

February 23, 2017

Mr. Bradley Hartshorn
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 Mr. Hartshorn:

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 2016, Veolia collected a total weight of 2 pounds of elemental mercury from Florida Department of Environmental Protection off-setting the quantity of mercury contained in the glass and aluminum shipped off-site for beneficial reuse in 2016 from Veolia's mercury recovery facility. A copy of the receiving documents 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 0.76 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 2017.

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

Sincerely,

Phillip Ditter, CHMM
Environmental Health and Safety Manager

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Enc.

Cc: Wayne Bulsiewicz, Matthew Melott

VEOLIA TALLAHASSEE GLASS ANALYSIS
TOTAL MERCURY (mg/kg)

Week ending	Week	Aluminum	Entered	Verified	Shipped for Reuse	Rolling Average		Glass	Entered	Verified	Shipped for Reuse	Rolling Average		Aluminum Weekly Exceedence	Glass Weekly Exceedence	Aluminum Rolling Average Exceedence	Glass Rolling Average Exceedence
10/11/2015	41	1.2	PD	R	Y	1.879		1.2	PD	R	Y	1.678					
10/18/2015	42	1.6	R	PD	Y	1.954		4.2	R	PD	Y	1.895					
10/25/2015	43	0.64	R	PD	Y	1.616		0.58	R	PD	Y	1.802					
11/1/2015	44	7.6	R	PD	N	2.198		4.5	R	PD	Y	1.993					
11/8/2015	45	4.5	R	PD	Y	2.547		1.5	R	PD	Y	1.860					
11/15/2015	46	0.19	R	PD	Y	2.533		1	R	PD	Y	1.827					
11/22/2015	47	0.3	R	PD	Y	2.325		1.8	R	PD	Y	1.917					
11/29/2015	48	0.67	R	PD	Y	2.098		0.2	R	PD	Y	1.742					
12/6/2015	49	1.2	R	PD	Y	1.973		0.49	R	PD	Y	1.691					
12/13/2015	50	0.47	R	PD	Y	1.983		0.83	R	PD	Y	1.610					
12/20/2015	51	3.4	R	PD	Y	1.866		0.56	R	PD	Y	1.580					
12/27/2015	52	17	R	PD	N	3.231		0.9	R	PD	Y	1.480					
1/3/2016	1					NULL						NULL		NONE	NONE	NONE	NONE
1/10/2016	2	0.029	R			3.273		0.81	R	PD	Y	1.197		NONE	NULL	NONE	0.19727
1/17/2016	3	0.034	R	PD	Y	3.218		4.1	R	PD	Y	1.517		NULL	1.1	2.21755	0.51727
1/24/2016	4	2.9	R	PD	Y	2.790		0.85	R	PD	Y	1.185		NULL	NULL	1.79027	0.18545
1/31/2016	5	0.67	R	PD	Y	2.442		0.81	R	PD	Y	1.123		NULL	NULL	1.44209	0.12273
2/7/2016	6	3.1	R	PD	Y	2.707		1.1	R	PD	Y	1.132		0.1	NULL	1.70664	0.13182
2/14/2016	7	0.45	R	PD	Y	2.720		4.2	R	PD	Y	1.350		NULL	1.2	1.72027	0.35000
2/21/2016	8	0.12	R	PD	Y	2.670		2.3	R	PD	Y	1.541		NULL	NULL	1.67027	0.54091
2/28/2016	9	0.83	R	PD	Y	2.637		1.5	R	PD	Y	1.633		NULL	NULL	1.63664	0.63273
3/6/2016	10	0.6	R	PD	Y	2.648		1.5	R	PD	Y	1.694		NULL	NULL	1.64845	0.69364
3/13/2016	11	2.4	R	PD	Y	2.558		2.5	R	PD	Y	1.870		NULL	NULL	1.55755	0.87000
3/20/2016	12	0.89	R	PD	Y	1.093		1.1	R	PD	Y	1.888		NULL	NULL	0.09300	0.88818
3/27/2016	13	0.96	R	PD	Y	1.082		0.86	R	PD	Y	1.803		NULL	NULL	0.08192	0.80250
4/3/2016	14	0.62	R	PD	Y	1.131		0.44	R	PD	Y	1.772		NULL	NULL	0.13117	0.77167
4/10/2016	15	0.56	R	PD	Y	1.175		1.5	R	PD	Y	1.555		NULL	NULL	0.17500	0.55500
4/17/2016	16	1.3	R	PD		1.042		0.65	R	PD	Y	1.538		NONE	NULL	NONE	0.53833
4/24/2016	17	0.62	R	PD	Y	1.038		0.49	R	PD	Y	1.512		NULL	NULL	0.03750	0.51167
5/1/2016	18	1.5	R	PD	Y	0.904		0.098		PD	Y	1.428		NULL	NULL	NULL	0.42817
5/8/2016	19	0.044	R	PD	Y	0.870		1.2	R	PD	Y	1.178		NULL	NULL	NULL	0.17817
5/15/2016	20	0.049	R	PD	Y	0.864		0.46	R	PD	Y	1.025		NULL	NULL	NULL	0.02483
5/22/2016	21	0.14	R	PD	Y	0.807		1.4	R	PD	Y	1.017		NULL	NULL	NULL	0.01650
5/29/2016	22	0.99	R	PD	Y	0.839		0.65	R	PD	Y	0.946		NULL	NULL	NULL	NULL
6/5/2016	23	0.34	R	PD	Y	0.648		1	R	PD	Y	0.821		NULL	NULL	NULL	NULL
6/12/2016	24	0.079	R	PD	Y	0.600		0.28	R	PD	Y	0.752		NULL	NULL	NULL	NULL
6/19/2016	25	0.49	R	PD	Y	0.561		0.69	R	PD	Y	0.738		NULL	NULL	NULL	NULL
6/26/2016	26	0.51	R	PD	Y	0.552		3.9	R	PD	Y	1.027		NULL	0.9	NULL	0.02650
7/3/2016	27	0.46	R	PD	Y	0.544		0.46	R	PD	Y	0.940		NULL	NULL	NULL	NULL
7/10/2016	28	1.4	R	PD	Y	0.552		0.42	R	PD	Y	0.921		NULL	NULL	NULL	NULL
7/17/2016	29	0.18	R	PD	Y	0.515		0.68	R	PD	Y	0.937		NULL	NULL	NULL	NULL
7/24/2016	30	0.2	R	PD	Y	0.407		3.5	R	PD	Y	1.220		NULL	0.5	NULL	0.22000
7/31/2016	31				N	NULL		1.4	R	PD	Y	1.237		NONE	NULL	NONE	0.23667

VEOLIA TALLAHASSEE GLASS ANALYSIS
TOTAL MERCURY (mg/kg)

Week ending	Week	Aluminum	Entered	Verified	Shipped for Reuse	Rolling Average		Glass	Entered	Verified	Shipped for Reuse	Rolling Average		Aluminum Weekly Exceedence	Glass Weekly Exceedence	Aluminum Rolling Average Exceedence	Glass Rolling Average Exceedence
8/7/2016	32				N	NULL					N	NULL		NONE	NONE	NONE	NONE
8/14/2016	33				N	NULL					N	NULL		NONE	NONE	NONE	NONE
8/21/2016	34				N	NULL					N	NULL		NONE	NONE	NONE	NONE
8/28/2016	35	0.32	R	PD	Y	0.455		0.58	R	PD	Y	1.323		NULL	NULL	NULL	0.32333
9/4/2016	36	2.3	R	PD	Y	0.733		1.1	R	PD	Y	1.414		NULL	NULL	NULL	0.41444
9/11/2016	37	1.6	R	PD	Y	0.871		1.6	R	PD	Y	1.516		NULL	NULL	NULL	0.51556
9/18/2016	38	1.9	R	PD	Y	1.045		2.6	R	PD	Y	1.371		NULL	NULL	0.04500	0.37111
9/25/2016	39	0.95	R	PD	Y	1.106		2.6	R	PD	Y	1.609		NULL	NULL	0.10625	0.60889
10/2/2016	40	0.03	R	PD	Y	0.935		0.82	R	PD	Y	1.653		NULL	NULL	NULL	0.65333
10/9/2016	41	4.3	R	PD	Y	1.450		0.47	R	PD	Y	1.630		1.3	NULL	0.45000	0.63000
10/16/2016	42	0.54	R	PD	Y	1.493		1.4	R	PD	Y	1.397		NULL	NULL	0.49250	0.39667
10/23/2016	43	0.36	R	PD	Y	1.367		0.83	R	PD	Y	1.333		NULL	NULL	0.36667	0.33333
10/30/2016	44	0.5	R	PD	Y	1.280		0.15	R	PD	Y	1.215		NULL	NULL	0.28000	0.21500
11/6/2016	45	0.63	R	PD	Y	1.221		0.76	R	PD	Y	1.174		NULL	NULL	0.22091	0.17364
11/13/2016	46	0.45	R	PD	Y	1.157		1	R	PD	Y	1.159		NULL	NULL	0.15667	0.15917
11/20/2016	47	3.5	R	PD	Y	1.422		0.52	R	PD	Y	1.154		0.5	NULL	0.42167	0.15417
11/27/2016	48	2.9	R	PD	Y	1.472		0.41	R	PD	Y	1.097		NULL	NULL	0.47167	0.09667
12/4/2016	49	0.8	R	PD	Y	1.405		0.54	R	PD	Y	1.008		NULL	NULL	0.40500	0.00833
12/11/2016	50	2.5	R	PD	Y	1.455		0.54	R	PD	Y	0.837		NULL	NULL	0.45500	NULL
12/18/2016	51	1.7	R	PD	Y	1.518		2.2	R	PD	Y	0.803		NULL	NULL	0.51750	NULL
12/25/2016	52	0.64	R	PD	Y	1.568		2.4	R	PD	Y	0.935		NULL	NULL	0.56833	NULL
1/1/2017	53	1.5	R	PD	Y	1.335		2.4	R	PD	Y	1.096		NULL	NULL	0.33500	0.09583
														0.6333	**0.9250**	**0.7311**	**0.3741**
														3	**4**	**29**	**39**
								Weight of Glass per week					40395.77		0.1495		0.5894
								Weight of alumium per week					861.6154	0.0016		0.0183	
								Total mercury to be recovered through alternate management						0.76			

VEOLIA ENVIRONMENTAL SERVICES

UNIVERSAL WASTE BILL OF LADING

Generator Name and Mailing Address	Destination Facility	
FDEP	Veolia E.S. Technical Solutions, LLC	BOL No. TLH-91916
Residential Pick Up	342 Marpan Ln.	Doc. No.
Gadsden Co. Florida	Tallahassee, Fl. 32305	SO No. [redacted]
	FL0000207449	Emergency Contact 1-800-535-5053
Phone No.	Phone No. 850-877-8299	

Designated Facility, as checked below.

☐	☐	☐	☒
Veolia ES Technical Solutions, L.L.C.	Veolia ES Technical Solutions, L.L.C.	Veolia ES Technical Solutions, L.L.C.	Veolia ES Technical Solutions, L.L.C.
1275 Mineral Springs Drive	5736 West Jefferson Street	230 Canton Street	342 Marpan Lane
Port Washington, WI 53074	Phoenix, AZ 85043	West Bridgewater, MA	Tallahassee, FL 32305
(262) 243-8900	(602) 233-2955	(781) 341-6080	(850) 878-2259
WID988566543	AZ0000337360	MA5000004713	FL0000207449

HM	Container Count	Container Type	Total Qnty Cnt or WT	DOT Description	Common Name	Profile Number	Discrepancy
				RQ, UN2809, Mercury contained in manufactured articles, 8, PG III, ERG#172	Mercury Containing Articles (Refer to State Regulations)		
	1	Cf	2#	RQ, UN2809, Mercury, 8, PG III, ERG#172	Mercury	190833	
				RQ, UN3077, Environmentally Hazardous Substance solid, n.o.s., 9, PGIII (PCB), ERG# 171	TSCA Exempt PCB Lamp Ballasts	163050	
				RQ, UN3077, Environmentally Hazardous Substance solid, n.o.s., 9, PGIII (PCB), ERG# 171	TSCA Exempt PCB Capacitors	555768	
				UN2800, Batteries, wet, nonspillable, electric storage, 8, PGIII, ERG#154	Lead Acid Batteries - Sealed		
				UN2794, Batteries, wet, filled with acid, 8, PGIII, ERG#154	Lead Acid Batteries		
				UN3090, Lithium Battery, 9, PGII, ERG#138	Lithium Batteries		
				UN2795, Batteries, wet filled with alkali, 8, PGIII, ERG# 154	NiCad Batteries - Wet		
				Batteries, dry, non-DOT regulated	NiCad Batteries - Dry		
				Batteries, dry, non-DOT regulated	Alkaline Batteries		
				ByProduct, Non-DOT Regulated, Post Retort Phosphor Powder	ByProduct, Retorted Calcium Phosphate	620805	
				Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Fluorescent Lamps 4' and under	141356	
				Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Fluorescent Lamps 5' and over	141356	
				Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Circular/U-tube Lamps		
				Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Compact Lamps		
				Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Shattershield/Shielded 4ft and Under	577250	
				Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Shattershield/Shielded 5ft and Over	577250	
				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, Non PCB Capacitors	Non PCB Capacitors for Recycling		
				Non-DOT Regulated Electronic Equipment for Recycling/Reuse/Remanufacture	Electronics - NonPCB Dental X-Ray Head		
				Non-DOT Regulated Ballasts for Recycling	Non PCB Light Ballasts		

Generator/Shippers 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: [illegible]   Date: 9-19-16

Transporter 1 Name: Transporter 2 Name:
Phone Number: Phone Number:
Signature   Date   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 273.18(d), 40 CFR 273.38(d), and 40 CFR 264.12(b) the Designated Facility agrees to receive shipments of Universal Waste from the Generator.

Signature: [illegible]   Date: 9-19-16