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MAR 02 2018

NORTHWEST FLORIDA
DEP

**TECHNICAL SOLUTIONS
NORTH AMERICA**

March 1, 2018

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 2017, Veolia collected a total weight of 7 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 2017 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 2.17 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 2018.

If you have any questions, please call me at (602) 725-7726 or Matthew Melott at (850) 877-8299.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Bulsiewicz", with a long horizontal stroke extending to the right.

Wayne Bulsiewicz
Environmental Health and Safety Manager

Enc.

Cc: Matthew Melott

Veolia ES Technical Solutions, L.L.C.
342 Marpan Lane, Tallahassee, FL 32305
tel: 850 877 8299
www.veolianorthamerica.com

2017 Alternate Management Plan Report

VEOLIA TALIAHASSEE GLASS ANALYSIS
TOTAL MERCURY (mg/kg)

Week ending	Week	Aluminum Entered	Verified	Shipped for Reuse	Notes	Rolling Average	Glass Entered	Verified	Shipped for Reuse	Notes	Rolling Average	Aluminum Weekly Exceedance	Glass Weekly Exceedance	Aluminum Rolling Average Exceedance	Glass Rolling Average Exceedance
10/6/2016	42	0.54 R	PD	Y		1.879	1.4 R	PD	Y		1.879				
10/23/2016	43	0.36 R	PD	Y		1.964	0.83 R	PD	Y		1.895				
10/30/2016	44	0.5 R	PD	Y		1.616	0.15 R	PD	Y		1.802				
11/6/2016	45	0.63 R	PD	Y		2.188	0.76 R	PD	Y		1.983				
11/13/2016	46	0.45 R	PD	Y		2.547	1 R	PD	Y		1.860				
11/20/2016	47	3.5 R	PD	Y		2.533	0.52 R	PD	Y		1.827				
11/27/2016	48	2.9 R	PD	N	2016-14	2.325	0.41 R	PD	Y		1.917				
12/4/2016	49	0.8 R	PD	Y		2.088	0.54 R	PD	Y		1.742				
12/11/2016	50	2.5 R	PD	Y		1.973	0.54 R	PD	Y		1.891				
12/18/2016	51	1.7 R	PD	Y		1.983	2.2 R	PD	Y		1.610				
12/25/2016	52	0.64 R	PD	Y	2016-15	1.866	2.4 R	PD	Y	2016-15	1.580				
1/1/2017	53	1.5 R	PD	Y	2016-16	3.231	2.4 R	PD	Y		1.480				
1/8/2017	1	0.2 R	PD	Y		1.110	1.2 R	PD	Y		1.079			0.11000	0.07917
1/15/2017	2	0.33 R	PD	Y	2017-1	1.083	0.096 R	PD	Y		1.018			0.09250	0.01800
1/22/2017	3	1.8 R	PD	Y		1.213	3.8 R	PD	Y		1.322			0.21250	0.32217
1/29/2017	4	1.4 R	PD	Y		1.227	1.4 R	PD	Y		1.376			0.22692	0.37550
2/5/2017	5	0.47 R	PD	Y		1.274	1.1 R	PD	Y		1.384			0.27417	0.38363
2/12/2017	6	3.7 R	PD	Y		1.545	4.7 R	PD	Y		1.732	0.7		0.54500	0.73217
2/19/2017	7		PD	N	2017-2	NULL	2.3 R	PD	Y		1.890			0.88997	0.88997
2/26/2017	8	2.6 R	PD	Y	2017-3	1.470	2.6 R	PD	Y		2.061			0.47000	1.06133
3/5/2017	9	0.78 R	PD	Y	2017-4	1.489	3.4 R	PD	Y		2.300			0.46917	1.29967
3/12/2017	10	0.34 R	PD	Y	2017-5	1.289	2.2 R	PD	Y		2.300			0.28917	1.29967
3/19/2017	11	2.6 R	PD	Y		1.384	4.8 R	PD	Y	2017-6	2.483			0.36417	1.48300
3/26/2017	12	3.2 R	PD	Y		1.578	1.2 R	PD	Y		2.363	0.2	NULL	0.57750	1.36300
4/2/2017	13	1.3 R	PD	Y	2017-7	1.561	1.9 R	PD	Y	2017-7	2.441			0.56083	1.44133
4/9/2017	14		PD	N	2017-8	NULL	1.5 R	PD	Y		2.558			0.56083	1.55833
4/16/2017	15	1.4 R	PD	Y		1.782	4 R	PD	Y		2.575			0.78182	1.57500
4/23/2017	16	1.4 R	PD	Y		1.745	1.6 R	PD	Y		2.592			0.74545	1.59167
4/30/2017	17		PD	N	2017-9	NULL	0.62 R	PD	Y		2.552			0.74545	1.55167
5/7/2017	18	2.1 R	PD	Y		1.943	0.19 R	PD	Y		2.176			0.94300	1.17583
5/14/2017	19		PD	N	2017-10	NULL	1.6 R	PD	Y		2.118			0.94300	1.11750
5/21/2017	20		PD	N	2017-11	NULL	1.9 R	PD	Y		2.059			0.94300	1.05917
5/28/2017	21	0.92 R	PD	N	2017-12	NULL	0.46 R	PD	Y		1.814			0.81417	0.81417
6/4/2017	22	4.7 R	PD	N		NULL	1.9 R	PD	Y		1.789			0.78917	0.78917
6/11/2017	23		PD	N	2017-13	NULL	4.8 R	PD	Y		1.806			0.80563	0.80563
6/18/2017	24		PD	N	2017-14	NULL	1.6 R	PD	Y	2017-14	1.839			0.83917	0.83917
6/25/2017	25		PD	N		NULL	0.32 R	PD	Y		1.708			0.70750	0.70750
7/2/2017	26		PD	N		NULL	3.5 R	PD	Y		1.874			0.5	0.87417
7/9/2017	27		PD	N		NULL	1.7 R	PD	Y		1.863			0.86250	0.86250
7/16/2017	28		PD	N		NULL	0.85 R	PD	Y		1.820			0.82000	0.82000
7/23/2017	29		PD	N	2017-15	NULL	3.8 R	PD	Y		1.885			0.88500	0.88500
7/30/2017	30		PD	N		NULL	1.4 R	PD	Y		1.886			0.88500	0.88500
8/6/2017	31	0.98 R	PD	Y		1.740	1.2 R	PD	Y		1.953			0.74000	0.74000
8/13/2017	32	0.74 R	PD	Y		1.763	0.64 R	PD	Y		1.948			0.76250	0.84750
8/20/2017	33	1.5 R	PD	Y	2017-16	1.579	0.63 R	PD	Y		1.862			0.57917	0.86167
8/27/2017	34	4.3 R	PD	Y		1.721	4 R	PD	Y		2.037	1.3		0.72083	1.03667
9/3/2017	35	2 R	PD	Y		1.822	1.3 R	PD	Y		1.745			0.82167	0.74500
9/10/2017	36	1.9 R	PD	Y		1.862	2.1 R	PD	Y		1.787			0.95167	0.78667

VEOLIA TALLAHASSEE GLASS ANALYSIS
TOTAL MERCURY (mg/kg)

[illegible]



CERTIFICATE OF ACCEPTANCE FOR RECYCLING AND/OR DISPOSAL

By accepting the waste products described by the document number below on this certificate, Veolia ES Technical Solutions L.L.C. (Veolia ES) certifies to the generator that the transportation, storage or processing methods employed are in accordance with the Veolia ES permit parameters and all applicable federal, state and local laws.

BILL TO:	GENERATOR:
FLORIDA A&M UNIVERSITY P.O.BOX 7238 ATTN: ACCOUNTS PAYABLE TALLAHASSEE FL 32314-7238	FLORIDA A&M UNIVERSITY 2400 WAHNSH WAY TALLAHASSEE, FL 32307

Product Code	Description	QTY	UOM
LP-F04	Recycle - Four Foot Fluorescent Lamps	2814.0	LMP
LP-FUT	Recycle - U-Tube Lamps	105.0	LMP
LP-H01	Recycle - HID Lamps	324.0	LMP
LP-FCMP01	Recycle - Compact Fluorescent Lamps	257.0	LMP
LP-IBRKN	Recycle - Broken Fluorescent Lamps	170.0	P
BL-NPCB-RE	Recycle - Non-PCB Lamp Ballasts	497.0	P
MC-HG	Recycle - Mercury	7.0	P
CP-SM-NONPCB-IN	Incineration - Small Non-PCB Capacitors	14.0	P

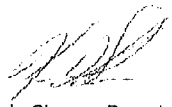
KEY: P = POUNDS, LFT = LINEAR FEET, LMP = LAMP, EA = EACH.

Questions regarding this certificate should be directed to customer service, toll free at 1-800-556-5267.

DOCUMENT #: D11339063
SALES ORDER #: 1983763
RECEIVED DATE: 1/16/18
FACILITY EPA ID: FL0000207449
RETURN TRACKING#: A00318
CUSTOMER MANIFEST:
STATE MANIFEST:
LINE NOTE:

PROCESSING FACILITY:
VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
342 MARPAN LANE
TALLAHASSEE, FL 32305

Under civil and criminal penalties of law for making or submission of false statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified information in this document, for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made verification that this information is true, accurate and complete.


Kevin Shaver, Branch Manager
January 16, 2018



A00318

UNIVERSAL WASTE BILL OF LADING

Generator Name and Mailing Address Florida A&M University 2400 Wahnish way Tallahassee, FL 32307		Location Address (if different)		Emergency Contact 1-877-818-0087 Contracted by VES-TS		
				Purchase Order #		
				Document #		
				Sales Order# 1482763		
Designated Facility						
☐ Veolia ES Technical Solutions 5736 West Jefferson Street Phoenix, AZ 85043						
☐ Veolia ES Technical Solutions 1275 Mineral Springs Dr. Port Washington, WI 53074						
☐ Veolia ES Technical Solutions 90 Pleasant Street West Bridgewater, MA 02379						
☒ Veolia ES Technical Solutions 342 Marpan Lane Tallahassee, FL 32305						
Per 40 CFR 273.18(d), 40 CFR 273.38(d), and 40 CFR 264.12(b), the Designated Facility noted within this section agrees to receive the below listed shipment of Universal Wastes from the Generator.						
HM	Container Count	Type	Quantity Cnt or Wt	DOT Description	Common Name	Profile Number/ NMFC Code
				UN3506, Mercury contained in manufactured articles, 8 (6.1), PG III, RQ	Mercury Containing Articles (Refer to State Regulations)	
				UN2809, Mercury, 8 (6.1), PG III, RQ	Mercury	
X	1	CF	7 pails	UN3077, Environmentally Hazardous Substance solid, n.o.s., 9, PGIII, RQ (PCB)	TSCA Exempt PCB Lamp Ballasts	
				UN3077, Environmentally Hazardous Substance, solid, n.o.s., 9, PGIII, (Mercury)	Mercury Batteries	
				UN2800, Batteries, wet, nonspillable, 8	Lead Acid Batteries - Sealed	
				UN2794, Batteries, wet, filled with acid, 8	Lead Acid Batteries	
				UN2795, Batteries, wet filled with alkali, 8	NiCad Batteries - Wet	
				UN3090, Lithium metal batteries, 9	Lithium Metal Batteries	
				UN3480, Lithium ion batteries, 9	Lithium Ion Batteries	
				Batteries, dry, sealed, n.o.s.	NiCad Batteries - Dry	
				Batteries, dry, sealed, n.o.s.	Alkaline Batteries	
				Batteries, dry, sealed, n.o.s.	Mixed Batteries	
	2	CV		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/U-tube Lamps	
	1	CV	MIXED 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	
				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	
	1	DF		Lamps, Non-DOT Regulated (per 49 CFR 173.164(e))	Broken Lamps	
				Non-DOT Regulated Electronic Equipment for Recycling/Reuse/Remanufacture	Electronics	
	1	DM	Box 7	Non-DOT Regulated Ballasts for Recycling	Non PCB Light Ballasts	
				NON-DOT REGULATED CAPACITORS NO PCB'S		
Generator/Shipper 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: <i>Brian Shupard</i> Date: 1/12/2018						
Initials: _____ Date: _____ Please Initial to confirm counts are correct						
Transporter 1 Name: <i>VEOLIA ENVIRONMENTAL SERVICES</i> Phone: <i>800-877-2667</i>			Transporter 2 Name: _____ Phone: _____			
Signature: <i>[Signature]</i> Date: 1/12/18			Signature: _____ Date: _____			
Designated Facility: 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.						
Notes: <i>Christie Dyrick</i> Date: 1/16/18						

**FLORIDA A&M UNIVERSITY**

1601 S Martin Luther King Jr
Tallahassee FL 32307
United States

Supplier: 364394814
VEOLIA ES TECHNICAL SOLUTIONS, LLC
342 MARPAN LANE
TALLAHASSEE FL 32305

Purchase Order**CHANGE ORDER - REPRINT Dispatch via Print**

Purchase Order	Date	Revision	Page
FAM01-0000163961	11/08/2017	1 - 01/30/2018	1
Payment Terms	Freight Terms	Ship Via	
Net 30	Destination	Common Carrier	
Buyer	Phone	Currency	
FAS Roberts, Annette	850/599-3299	USD	

Ship To: 1POMA00102
2400 Wahnish Way
Tallahassee FL 32307
United States

Attention: Kavaris D Sirmon

Bill To: P.O. Box 7238
Tallahassee FL 32314-7238
United States

Tax Exempt? Y **Tax Exempt ID:** 85-8012683664C-9

Replenishment Option: Standard

Line-Sch	Item/Description	Mfg ID	Quantity UOM	PO Price	Extended Amt	Due Date
1- 1	Drop off one 55 gallon replacement drum		1.00EA	35.00	35.00	11/09/2017

Schedule Total 35.00

<<Pick Up to occur in November. This is all POM Waste. Price may vary based on real counts at time of pickup. Remove all mercury containing lamps, ballasts and waste capacitors from EHS Universal Waste building. WO # 18-04071. Bari Shepard (850) 599-8021. FAMU EHS.>>

Item Total 35.00

2- 1	55 gallon drum non-pcb ballasts 88lbs.		88.00EA	0.10	8.80	11/09/2017
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Schedule Total 8.80

Item Total 8.80

3- 1	U bend Lamps		95.00EA	0.32	30.40	11/09/2017
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Schedule Total 30.40

Item Total 30.40

4- 1	4 foot lamps, boxed, on pallet		6,912.00EA	0.05	345.60	11/09/2017
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Schedule Total 345.60

Item Total 345.60

5- 1	HID Lamps		252.00EA	0.70	176.40	11/09/2017
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Schedule Total 176.40

Item Total 176.40

6- 1	Elemental Mercury		7.00LBS	0.00	0.00	11/09/2017
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Schedule Total 0.00

Item Total 0.00

7- 1	CFL's		215.00EA	0.35	75.25	11/09/2017
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Schedule Total 75.25

Item Total 75.25

8- 1	NonPCB Capacitors per pound, 14 pounds total		14.00LBS	1.60	22.40	11/09/2017
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Authorized Signature

Samela C. Lightbourne

**FLORIDA A&M UNIVERSITY**

1601 S Martin Luther King Jr
Tallahassee FL 32307
United States

Supplier: 364394814
VEOLIA ES TECHNICAL SOLUTIONS, LLC
342 MARPAN LANE
TALLAHASSEE FL 32305

Purchase Order**CHANGE ORDER - REPRINT Dispatch via Print**

Purchase Order	Date	Revision	Page
FAM01-0000163961	11/08/2017	1 - 01/30/2018	2
Payment Terms	Freight Terms	Ship Via	
Net 30	Destination	Common Carrier	
Buyer	Phone	Currency	
FAS Roberts, Annette	850/599-3299	USD	

Ship To: 1POMA00102
2400 Wahnish Way
Tallahassee FL 32307
United States

Attention: Kavaris D Sirmon

Bill To: P.O. Box 7238
Tallahassee FL 32314-7238
United States

Tax Exempt? Y **Tax Exempt ID:** 85-8012683664C-9

Replenishment Option: Standard

Line-Sch	Item/Description	Mfg ID	Quantity	UOM	PO Price	Extended Amt	Due Date
Schedule Total						22.40	
Item Total						22.40	
9- 1	Transportation		1.00	EA	75.00	75.00	11/09/2017
Schedule Total						75.00	
Item Total						75.00	
10- 1	14% security and energy charge		769.00	EA	0.14	107.66	11/09/2017
Schedule Total						107.66	
Item Total						107.66	
11- 1	Change Order to P.O. # 163961 from \$876.51 to \$2,816.88. Due to Modifications.		1.00	EA	1,940.37	1,940.37	02/02/2018
Schedule Total						1,940.37	

<<Pickup to occur in June. This is all POM Waste. Price may vary based on real counts at this time of pickup. WO # 18-04071. Geraldine Ingram (850) 599-8021. Famu EH&S.>>

Item Total 1,940.37

PURCHASE ORDER TERM AND CONDITIONS ARE LOCATED ON THE FOLLOWING LINK:

http://www.famu.edu/Purchasing/PURCHASE%20ORDER%20TERM%20AND%20CONDITIONS_May2013.pdf

Total PO Amount 2,816.88

Authorized Signature

Geraldine C. Lightbourne