February 25, 2005

Mr. Jim Byer
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, FL 32501-5794

RE: Alternate Management Plan Report, 2004
Onyx Special Services, Inc.
342 Marpan Lane
Tallahassee, FL 32305
EPA ID# FL0000207449

Dear Mr. Byer:

This letter is being submitted to provide an accounting of the actions taken by Onyx Special Services to comply with the Alternate Management Plan for the recovery of thermometers and devices. Please find enclosed the calculations for the actual quantity of mercury contained in the by-products generated at our facility, the analytical results for the testing performed on those by-products, and the calculations documenting the amount of mercury recovered under this program.

This letter will also serve to notify you of our intentions to continue to operate the facility in accordance with alternate management plan.

If you have any questions please call Greg Newton at (602) 233-2955 or me at (850) 878-2259.

Regards,

Jeff Kirk
Operations Manager

CC: Greg Newton

Onyx Environmental Services, LLC
Electronics Recycling Division
342 Marpan Lane, Tallahassee, FL 32305
Tel: 850 878 2259 • Fax: 850 878 3349
www.onyxes.com

2004 Alternate Management Plan Report

Total year average of points greater than 1.0

Aluminum		Glass	
Weeks	Avg	Weeks	Avg
4	1.268	1	1.001

Total weight generated during the year (lbs)

37,456	2,506,500

Average weekly generation rate (lbs)

720	48,202

Total weight of residual mercury (lbs)
(weeks X weight of byproduct X concentration / 1,000,000)

0.004	0.048

Mercury offset required (lbs)
Total residual mercury - allowable
Allowable = weeks X weightof byproduct X 1/1,000,000

0.001	0.000

Total combined = 0.001lb

Total collected for offset = 4lbs

Year	Week	Aluminum	Rolling	Glass	Rolling
2004	2	0.973	1.235	0.850	0.982
	3	1.600	1.369	BDL	0.959
	4	BDL	1.264	0.740	0.823
	5	BDL	1.205	0.770	0.887
	6	BDL	0.956	0.170	0.748
	7	BDL	0.940	0.170	0.468
	8	BDL	0.577	0.456	0.506
	9	0.954	0.656	0.162	0.450
	10	1.030	0.742	0.790	0.516
	11	0.270	0.609	0.951	0.422
	12	0.638	0.608	0.348	0.451
	13	0.254	0.561	0.385	0.483
	14	0.670	0.532	BDL	0.412
	15	BDL	0.451	1.176	0.510
	16	0.366	0.349	0.273	0.471
	17	0.535	0.393	1.430	0.526
	18	BDL	0.393	1.020	0.597
	19	BDL	0.393	1.030	0.668
2004	20	0.210	0.411	BDL	0.630
	21	BDL	0.411	BDL	0.617
	22	0.268	0.353	0.584	0.600
	23	BDL	0.268	BDL	0.521
	24	BDL	0.245	BDL	0.492
	25	0.601	0.242	0.730	0.520
	26	0.421	0.256	0.540	0.565
	27	BDL	0.200	0.181	0.482
	28	1.940	0.362	BDL	0.460
	29	BDL	0.331	BDL	0.340
	30	BDL	0.287	BDL	0.255
	31	BDL	0.287	0.655	0.224
	32	BDL	0.287	2.930	0.468
	33	BDL	0.269	BDL	0.468
	34	1.240	0.373	BDL	0.420
	35	0.170	0.364	0.221	0.438
2004	36	BDL	0.364	0.155	0.451
	37	BDL	0.364	BDL	0.390
	38	BDL	0.314	0.164	0.359
	39	BDL	0.279	0.378	0.375
	40	0.215	0.297	BDL	0.375
	41	0.648	0.189	0.125	0.386
	42	0.125	0.200	BDL	0.386
	43	0.107	0.209	BDL	0.331
	44	1.200	0.309	2.200	0.270
	45	0.280	0.332	0.310	0.296
	46	0.120	0.342	1.300	0.404
	47	BDL	0.239	2.400	0.586
	48	0.033	0.227	2.100	0.748
	49	2.500	0.436	1.000	0.831
	50	BDL	0.436	0.800	0.884
	51	BDL	0.436	0.890	0.927
	52	BDL	0.436	0.890	1.001

ONYX

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

No. 988309

PO No. _____

Date: _____

TO: *Consignee*

☒ 342 Marpan Lane
Tallahassee, FL 32305
FL0000207449

☐ 8503 Sunstate St.
Tampa, FL 33634
FL0000369199

☐ _____

_____

_____

FROM: *Shipper* Marpan Supply

Street PO Box 2068
222 East Pershing St.

City Tallahassee FL 32316

I, HEREBY CERTIFY THAT THE BELOW LISTED MATERIALS ARE CLASSIFIED, DESCRIBED, PACKAGED, MARKED, LABELED AND IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPT. OF TRANSPORTATION.

* HM	Kind of Packaging: Description of Articles Special Marks and Exceptions	No. of Lamps Estimate	Actual	Linear Feet	Containers Rec'd	Containers Left	Type
	Spent Mercury containing lamps for recycling - not regulated by D.O.T.						
	Straight Fluorescent Lamps 1'						
	Straight Fluorescent Lamps 2'						
	Straight Fluorescent Lamps 3'						
	Straight Fluorescent Lamps 4'		24				
	Straight Fluorescent Lamps 5'						
	Straight Fluorescent Lamps 6'						
	Straight Fluorescent Lamps 8'						
	Straight Fluorescent Lamps 10'						
	SHATTERSHIELD						
	COMPACTS						
	U-SHAPED						
	CIRCULAR						
	HID						
	INCANDESCENTS						
	BROKEN						
	MERCURY CONTAINED IN MANUFACTURED ARTICLES, 8, UN2809, PGIII		4#				
	DRY CELL BATTERIES						
	BATTERIES, WET, NON-SPILLABLE, 8, UN2800, PGIII						
	BATTERIES, WET, FILLED W/ACID, 8, UN2794, PG-III						
	BATTERIES, WET, FILLED W/ALKALI, 8, UN2795, PG-III						
	NON PCB BALLAST						
	POLYCHLORINATED BIPHENYLS, 9, UN2315, PG-III						

RECEIVED BY: Delivered By DATE: 12/14/04

CUSTOMER SVC: ONYX SPECIAL SERVICES, INC. - 342 MARPAN LANE, TALLAHASSEE, FL 32305 (866) 877-8299
24 HOUR EMERGENCY RESPONSE, ONYX SPECIAL SERVICES, INC. (800) 535-5053

NOTES: Customer Dropped off

P# 237374

CO # 37346-1	SHIPPER	ACCEPTED BY:
SO # 285015	X N. Marcus	X
DOC #	DATE	DRIVER'S SIGNATURE

*MARK WITH AN "X" TO DESIGNATE HAZARDOUS MATERIAL AS DEFINED IN TITLE 49 OF THE CODE OF FEDERAL REGULATIONS.
IF THE PACKAGE CONTAINS GREATER THAN 1 POUND OF MERCURY OR PCB, MARK WITH "RQ".