Paul
DECORATIVE
PRODUCTS

February 24, 2011

Mr. Scott Nelson
U.S. Environmental Protection Agency
Mail Code 2254A
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Attn: Import-Export Program
Robert G. Heiss, Director

RE: Annual report for Hazardous Waste exports for 2011

Dear Mr. Scott Nelson:

Please find attached our report of hazardous waste exports for 2011. Please find below our statement concerning our efforts at waste minimization.

F006 waste is metal in their most elemental form, a metallic hydroxide. This waste cannot be rendered less toxic, as it is not very toxic to begin with. When we remove regulated metals from our wastewater we generate F006. We have employed many techniques to prevent metals from entering our wastewater, such as Ion Exchange, air-agitated counterflow and static rinses. In fact we have been so successful in this that we have reduced our water usage. We recycle 50% of our plating rinse waters and chemicals by returning them to the process tanks. The vast majority of the F006 waste generated is the residue of the treatment chemicals (calcium chloride, sodium hydroxide, ferric sulfate, etc.). If waste water regulations become stricter and with the new regulations on air discharges, demanding the installation of air scrubbers, we expect our volume of F006 to increase. We have limited our use of sodium hydroxide and made use of simultaneous carbamate and trimercapto sulfide precipitation, thereby reducing the weight and volume of the F006. Our waste minimization team has ascertained that the only direct way to reduce our F006 any further would be to reduce our production levels and terminate many employees.

During 2011 we made no hazardous waste shipments as our production requirements were significantly reduced due to lack of business.

We hope that this letter fulfills the requirements for 40 CFR.262.56.

Very truly yours,

Gary Paul

Gary Paul
President

Paul Decorative Products Inc • 195 Duke St • Louisa, VA 23093
540 967-0400 phone • 540 967-2580 fax

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AH Import-Export Program
Robert G Weiss, Director

20460

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ANNUAL REPORT OF HAZARDOUS WASTE EXPORTS FOR 2011

1. PRIMARY EXPORTER
   Name: Paul Decorative Products, Inc.
   EPA ID No.: VAR000500884
   Mailing Address: 195 Duke Street
   City: Louisa State: Virginia Zip: 23093
   Site Address: 195 Duke Street
   City: Louisa State: Virginia Zip: 23093

2. CONSIGNEE
   Name: Stablex Canada Inc.
   Address: 760 boul. Industriel
   Blainville, Quebec J7C 3V4
   EPA ID No.: NYD980756415

3. TRANSPORTER No. 1: Name: Transport Rollex Limitee
   EPA ID No.: NYF006000053
   TRANSPORTER No. 2: Name: Les Soudures Chagnon Ltee
   EPA ID No.: NYD986909752

4. WASTE INFORMATION
   N/A

5. SHIPPING INFORMATION
   Number of shipments during the Calendar Year: 0
   Total Volume of this waste shipped: 0 Tons

6. WASTE MINIMIZATION STATEMENT ATTACHED

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7. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Signed: _____ Date: 2/24/12

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