February 24, 2012

Office of Waste Programs Enforcement
RCRA Enforcement Division (OS-520)
United States Environmental Protection Agency
Ariel Rios Building (5101)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Dear Sir:

Subject: 2011 Hazardous Waste Export Report (EPA ID # NYR000184986)

Enclosed is the USEPA Annual Report of Hazardous Waste Exports for Rochester Silver Works, LLC facility located within Eastman Business Park. This submission covers exports of hazardous waste made during the calendar year 2011.

Any questions and correspondence relative to this request should be directed to:

Gary R. Winburn
Rochester Silver Works, LLC
P.O. Box 15397
Rochester, New York 14615-5397
Telephone: (585) 588-6184
Fax: (585) 722-7856
Email: GWinburn@rochestersilverworks.com

Sincerely,

Gary R. Winburn
Building Manager, Maintenance Supervisor, HSE Champion
Rochester Silver Works, LLC

attachment

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# ANNUAL REPORT OF HAZARDOUS WASTE EXPORTS FOR 2011

**1. Legal Name and Mailing Address:**

| | |
|---|---|
| **Name:** | Rochester Silver Works, LLC |
| **EPA ID:** | NYR000184986 |
| **Mailing Address:** | P.O. Box 15397<br>Rochester, New York 14652-5397 |

**2. Date and State of Incorporation:**

10/01/2011
New York

**3. Name and Address of the Registered Agent:**

Rochester Silver Works, LLC
P.O. Box 15397
Rochester, New York 14652-5397

**4. Name and Mailing Address of Each Foreign Facility to which Eastman Kodak Company Exported Hazardous Waste During the 2011 Calendar Year:**

**CONSIGNEE #1**

| | |
|---|---|
| **Name:** | Xstrata Canada Corporation |
| **EPA ID:** | FC0CANADA004 |
| **Address:** | Brunswick Smelter<br>692 Main Street<br>Belledune, New Brunswick<br>Canada, E8G 2M1 |

**TRANSPORTER #1**

| | |
|---|---|
| **Name:** | Laidlaw Carriers Tank GP, Inc. |
| **EPA ID:** | MIK918959883 |

**TRANSPORTER #2**

| | |
|---|---|
| **Name:** | Laidlaw Carriers Bulk GP, Inc. |
| **EPA ID:** | MIK621327675 |
| **EPA ID:** | NYD980769947 |

**5. Copies of EPA Acknowledgement of Consent Documents are Included in Attachments 1.**

**6. Annual Reports for 2011:**

**WASTE/SHIPPING INFORMATION:**

**WASTE STREAM #1:**

**Description of Waste:** Waste Refractory Brick
**EPA Waste Code:** D007 D011

**DOT Shipping Name:** Waste Corrosive Solids, N.O.S. (Sodium compounds), Class 8, PG III, (D007, D011)
**DOT Hazard Class:** "8"
**DOT ID Code (UN.NA):** UN1759

**Number of Shipments during the calendar year 2011: 0**
**Total Volume of this Waste Shipped: 0 tons**

**WASTE MINIMAZATION ACTIVITIES (Attachment 3)**

___ Not Required
___ Submitted with EPA Biennial Report
_X_ Attached

**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 there are possible penalties for submitting false information including the possibility of fine and imprisonment.

**Signed:** _____ **Date:** 2/24/12

**Attachment 1:**

Copy of EPA Acknowledgement of Consent Documents for Refractory Brick sent to the Brunswick Smelter

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND COMPLIANCE
ASSURANCE

January 11, 2012

JAY A. HULL
ROCHESTER SILVER WORKS LLC
100 LATONA ROAD, EASTMAN BUSINESS PARK BUILDING 110
ROCHESTER, NY US 14652

EPA Notice ID: 003712/11E/11

Dear JAY A. HULL:

This is to acknowledge receipt of your notice, which was received by EPA on November 4, 2011, of intent to export hazardous waste to Canada as required by Title 40, Code of Federal Regulations, Part 262, Subpart E, Section 262.53 promulgated pursuant to the Resource Conservation and Recovery Act (RCRA). In accordance with the U.S.-Canada Bilateral Agreement on the Transboundary Movement of Hazardous Waste, the U.S. Environmental Protection Agency (EPA) forwarded your notice to the Government of Canada and Canada has no objection to your shipment(s) of hazardous waste.

This letter constitutes the EPA Acknowledgment of Consent for the export of the following hazardous waste as specified in your notice:

**Waste Stream 1:** REFRACTORY BRICK FROM SMELTER
Waste Description: REFRACTORY BRICK FROM SMELTER
EPA Waste Code: D007 ,D011
DOT Shipping Name: Corrosive solids, n.o.s.
DOT Hazard Class: 8
DOT I.D. No. UN1759
Total Volume to be Exported: 100 US Tons - (2,000 pounds)
Estimated Frequency: 6 loads Annually

You may ship this waste to the following receiving facility/foreign importer:

XSTRATA CANADA CORPORATION BRUNSWICK SMELTER
692 MAIN STREET,
BELLEDUNE, NB, CA

Shipments may occur during the period from January 11, 2012, to January 11, 2013.

Please be advised of the following special RCRA requirements for export shipments of hazardous waste. These requirements are found at Title 40 Code of Federal Regulations, Part 262, Subpart E - Exports of Hazardous Waste.

1. If the major terms of the original notice should change, you must renotify EPA. Please send your renotification to: Environmental Protection Agency, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington D.C. 20460, "Attention: Notification to Export" prominently displayed on the front of the envelope. (§262.53(c))
2. The hazardous waste manifest for each shipment must identify the point of departure from the United States in Item 16. (§262.54(c))
3. A copy of this Acknowledgment of Consent must be attached to the U.S. hazardous waste manifest that accompanies each shipment of hazardous waste. (§262.54(h))
4. You must provide the transporter with an additional copy of the manifest for delivery to the U.S. Customs official at the point the hazardous waste leaves the United States in accordance with §263.20(g)(4). (§262.54(i))
5. You must file an exception report with the Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Environmental Protection Agency, Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460, if you have not received a copy of the manifest signed by the transporter stating the date and place of departure from the U.S. within forty-five (45) days from the date it was accepted by the initial transporter; if within ninety (90) days from the date the waste was accepted by the initial transporter, the primary exporter has not received written confirmation from the consignee that the hazardous waste was received; and the waste is returned to the United States. (§262.55)

6. You must file an annual report by March 1 of each year with the Environmental Protection Agency, Office of Federal Activities, International Compliance Assurance Division (2254A), Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460. (§262.56)

All shipments of hazardous waste must conform to all applicable state and federal hazardous waste regulations and transportation requirements, as well as these specific export requirements.

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Tyria Nesmith, EPA, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), telephone number 202-564-4369, fax number , nesmith.tyria@epa.gov.

Sincerely,

Robert G. Heiss, Director
International Compliance Assurance Division
Office of Federal Activities

# Attachment 2:

## Certification for Waste Minimization Activities*

*As Required by The New York State Solid and Hazardous Waste Law §27-0908, an Annual Hazardous Waste Reduction Plan (HWRP) is submitted annually by July 1st of each year.

The HWRP for Rochester Silver Works will be submitted for calendar year 2011 (January 1, 2011 – December 31, 2011) by July 1, 2012 to the New York State Department of Environmental Conservation, Division of Solid and Hazardous Materials - Bureau of Hazardous Waste Regulation.