February 19, 2013

Mr. Bob Perciasepe, Administrator (*acting*)
Environmental Protection Agency
Attn: Robert Heiss, Director
Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division
Ariel Rios Bldg. Room 6144
12th St. and Pennsylvania Ave, N.W.
Washington, DC 20004

Re: Annual Report
Eurecat U.S. Incorporated
13100 Baypark Road
Pasadena, TX 77507
EPA ID No.: TXD106829963

Dear Sir:

Eurecat U.S. Incorporated acted as a primary exporter in 2012 which is the period covered in this letter. This letter is offered to satisfy the Annual Report requirement applicable to primary exporters in accordance with Title 40 Code of Federal Regulations §262.56 Annual Reports. Eurecat shipped hazardous waste to the following consignee:

Eurecat France SAS
Quai Jean Jaures – BP No. 45
07800 La Voulte-sur-Rhone, France

EURECAT U.S. INCORPORATED
1331 Gemini, Suite 310
Houston, TX 77058
Phone: 281.218.0669
www.eurecat.com

received
SDN 2/21/2013

Information requested from §262.56 (a)(4)

Eurecat France SAS-

SPENT CATALYST CONTAINING Ni, NiW, NiCoMo, Cu/Zn, Cu, Pt, and Pd (EPA hazardous waste numbers K171) FOR VALORIZATION, DOT Hazard Class: 4.2, Name: Waste Self-heating solid, inorganic, n.o.s., Transporter ID: TXR000018317, Total Amount of Waste Shipped: 56,942 lbs in two shipments relative to our single notification. This waste was exported for metals reclamation.

40 CFR §262.56 (5)(i) and (ii),

The volume and toxicity of waste managed and generated by Eurecat U.S. Incorporated is a direct relationship with the volume and toxicity of the waste sent to Eurecat as a commercial waste management facility. This is documented in our in our most current annual Source Reduction and Waste Minimization Plan and Annual Report, submitted electronically and acknowledged by Texas Commission on Environmental Quality on June 24, 2011. As explained in our Source Reduction and Waste Minimization Plan and annual updates, as a recycling facility the amount of hazardous waste Eurecat generates is a direct function of the amount of industrial and hazardous waste Eurecats' customers send to us to process. On average, we generate as new waste from our material processing, approximately 2%-5% of the total wastes received. We return the remainder to the market as mostly recycled product. Materials that are not deemed suitable for regeneration after Eurecat's on-site evaluation but are recyclable materials may be managed as wastes for further reclamation. Eurecat only generates and stores hazardous and nonhazardous waste. Eurecat does not treat or dispose of any wastes on site. Eurecat has been receiving the same types of spent catalyst wastes since its inception in 1984.

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.

Sincerely,

Eurecat U.S. Incorporated

Burch Estes , *on behalf of primary exporter*

HSE Director

EURECAT U.S. INCORPORATED
1331 Gemini, Suite 310
Houston, TX 77058
Phone: 281.218.0669
www.eurecat.com

From: (281) 474-3076
Bobbett Wilkerson
EURECAT US
13100 BAY PARK RD

PASADENA, TX 77507

Origin ID: HBYA

FedEx Express

J13101212190326

Ship Date: 19FEB13
ActWgt: 1.0 LB
CAD: 3177337/INET3370

Delivery Address Bar Code

SHIP TO: (281) 474-3076 BILL SENDER

Office of Enforcement and Complianc
EPA-
Ariel rios Building room 6144
12th Street and Pennsylvania Ave. N
WASHINGTON, DC 20004

Ref # letter to EPA office of enforc
Invoice #
PO #
Dept #

FRI - 22 FEB A1
EXPRESS SAVER

TRK# 7947 8628 8641
0201

SA RDVA

20004
DC-US
DCA

518G1/DF24/93AB

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