# SABIN METAL CORPORATION

1647 WHEATLAND CENTER ROAD • SCOTTSVILLE, NEW YORK 14546

REFINERS OF PRECIOUS METALS
GOLD · SILVER · PLATINUM · PALLADIUM · RHODIUM

(585) 538- 2194
FAX# 585-538-2593


February 19, 2015

Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254A)
Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460

Re: Annual Report 2014

To Whom It May Concern:

Enclosed please find a report that contains the information required by 40 CFR 262.56 and 262.87(a).

I believe that you have all of the information you require. However, if you have any questions over this submission, do not hesitate to contact me.

Sincerely,

Michael S. Hubbard, MS, CIH
Senior Environmental Engineer

Enc.


received
SDM 2/24/2015

Sabin Metal Corp.
February 19, 2015

## EPA Annual Report for Exported Hazardous Waste – Calendar Year 2014

**Exporter:**

Sabin Metal Corporation EPA ID# NYD-067919340
1647 Wheatland Center Rd.
Scottsville NY 14546-0905

**Consignee:**

SMC (Canada), Ltd.
McAlpine Site/ Coleman Township
Cobalt ON P0J 1C0

**Transporter:**

Peter Hodge Transportation, Ltd.
100 Market Drive
Milton ON L9T 3H5

**Hazardous Waste Export Description:**

*Common Description:* Bricks and other refractory materials removed from ductwork, stacks and a thermal reduction furnace as a result of infrequent maintenance activities.

*Hazardous Waste Numbers:* D006, D007, D008

*DOT hazard class:* Environmentally Hazard Substance, Solid, n.o.s., (Lead)(Cadmium)(Chromium), 9, UN3077, PG III

**Quantities Shipped:**

*Weight Shipped:* 166,401 lb *Number of Shipments:* three (3)

**Comparison of Changes in Annual Volumes of Waste:**

Sabin does not have a hazardous waste stream that is generated and shipped continuously.

| Year | Waste | Quantity |
|---|---|---|
| 2003 | Silver/mercury batteries for mercury reclamation – silver residue returned | 4191 lb |
| 2004 | NA | NA |
| 2005 | Waste water – accidentally mixed waste water with plating bath residues | 10,050 lb |
| 2006 | Recovered spent plating bath solutions – evaporation system down for repairs | 120,112 lb |
| 2007 | Recovered spent plating bath solutions – evaporation system down for repairs | 3232 lb |
| | Silver/mercury batteries for mercury reclamation – silver residue returned | 2455 lb |
| | Bricks and other refractory materials from ductwork, stacks and furnaces | 437,945 lb |
| 2008 | Bricks and other refractory materials from ductwork, stacks and furnaces | 159,665 lb |
| 2009 | Silver/mercury batteries for mercury reclamation – silver residue returned | 3000 lb |
| 2010 | NA | NA |
| 2011 | NA | NA |
| 2012 | Silver/mercury batteries for mercury reclamation – silver residue returned | 13,916 lb |
| | Bricks and other refractory materials from ductwork, stacks and furnaces | 343,385 lb |
| 2013 | Silver/mercury batteries for mercury reclamation – silver residue returned | 14,773 lb |
| | Waste paint | 875 lb |
| 2014 | Silver/mercury batteries for mercury reclamation – silver residue returned | 20,272 lb |
| | Bricks and other refractory materials from ductwork, stacks and furnaces | 166,401 lb |
| | Waste epoxy paint | 25 lb |

**Description of Efforts to Reduce Volume and Toxicity of Waste:**

Education was provided to the operators of the water recovery process so as to prevent the mixing of listed waste residues with the non-hazardous waste water. That has not occurred since, so it could be said that Sabin's waste reduction effort (education) has resulted in 10,000 lbs less of hazardous waste being generated every year. The evaporation system was rebuilt in 2007, so Sabin will not be disposing of plating bath



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waste water, as it did in 2006 and early 2007, unless there is a problem with the evaporation system that cannot be foreseen. Re-installing the evaporation has, therefore, eliminated the production of 120,000 lb or more of hazardous waste per year.
The hazardous waste exported in 2007, 2008 and 2012 was brick from large thermal reduction furnaces and their associated stack and lined ductwork. For two systems, it was removed during maintenance activities that occur approximately every 15 to 20 years on that particular unit. The furnace system dismantled in 2012 will not be re-installed, so the generation of waste from it will never occur again. The source of the environmental hazard for furnace systems is the burning of customer electronic scrap materials and the evaporation of filtrates from plating bath solutions that contain gold. The only way to eliminate or reduce the hazard would be to not process customer materials containing lead and cadmium or to no longer accept their gold plating baths. That would entail reducing Sabin's business activity dramatically and would, therefore, be economically infeasible.

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.

*Signature:* _____ *Date:* 2/19/2015

*Name:* James A. Barrett *Title:* General Manager

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Sabin Metal Corp.
1647 Wheatland Center Rd
Scottsville, NY. 14546-0905

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