AVOX Systems Inc.
AIRCRAFT SYSTEMS
Oxygen Systems

ZODIAC AEROSPACE

March 8, 2011

U.S. Environmental Protection Agency
Ariel Rios Building
Mail Code 2254A
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460
c/o Robert G. Heiss, Director
International Compliance Assurance Division

Dear Mr. Heiss,

Attached please find the E.P.A. Annual Hazardous Waste Export Report for AVOX Systems Inc. calendar year 2010. The attached report was prepared by William Saskowski, Safety & Environmental Coordinator, prior to his departure. Please contact me at (716) 686-1537 if there are any questions.

Respectfully submitted,

Dawn L. Baker

Dawn L. Baker, SPHR
Manager, Human Resources
AVOX Systems Inc.

AVOX Systems Inc.
225 Erie Street Lancaster, NY 14086 – USA. Tel: (716) 683 5100 – Fax: (716) 681 1089 – www.avoxsys.com
Legal

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AVOX Systems Inc.
225 Erie Street
Lancaster, NY 14086 - USA

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US Environmental Protection Agency
Ariel Rios Bldg
Mail Code 2254A
1200 Pennsylvania Ave., NW.
Washington, DC 20460

Robert Hess, Director

EPA Annual Hazardous Waste Export Report
for Calendar Year 2010

Generator: **AVOX Systems Inc.**, 225 Erie Street, Lancaster, NY 14086 (**EPA ID# NYD042569772**)
Foreign Consignee Used: **Photech Environmental Solutions, Inc.**, 600 Read Road, St. Catherines, Ontario, Canada L2R 7K6 (**ID# A650233**)
Transporter Used: **Frank's Vacuum Truck Service EPA ID# NYD982792814**

Waste Name	EPA Hazardous Waste No.	DOT Class	Transporter Name and ID	Quantity (Pounds)	No. of Shipments
Waste Hydrochloric Acid, UN1789	D002	8	Frank's Vacuum Truck Service EPA ID# NYD982792814	1289.2	2
Waste Corrosive Liquid, Acidic, Inorganic, nos (phosphoric acid / nitric acid), UN3264	D002	8	Frank's Vacuum Truck Service EPA ID# NYD982792814	189.2	1
Waste Flammable Liquid, nos (miscellaneous laboratory chemicals), UN1993	D001	3	Frank's Vacuum Truck Service EPA ID# NYD982792814	1808.4	4
Waste Corrosive Liquid, Acidic, Inorganic, nos (nitric acid / sodium dichromate solution), UN3264	D002/D007	8	Frank's Vacuum Truck Service EPA ID# NYD982792814	3084.4	2
Hazardous Waste, Liquid, nos (sodium dichromate solution), UN3082	D007	9	Frank's Vacuum Truck Service EPA ID# NYD982792814	2299.0	1
Waste Solids Containing Flammable Liquid, nos (paint debris), UN3175	D001	4.1	Frank's Vacuum Truck Service EPA ID# NYD982792814	585.0	4
Waste Oxidizing Solids, Toxic, nos (barium peroxide / sodium chlorate), UN3087	D001/D005	5.1	Frank's Vacuum Truck Service EPA ID# NYD982792814	29960.6	4
Waste Flammable Liquid, nos (paint thinner) UN1993	D001/F003	3	Frank's Vacuum Truck Service EPA ID# NYD982792814	840.4	1

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Waste Name	EPA Hazardous Waste No.	DOT Class	Transporter Name and EPA ID	Quantity (Pounds)	No. of Shipments
Waste Aerosols, UN1950	D001	2.1	Frank's Vacuum Truck Service EPA ID# NYD982792814	18	1
Oxygen Generator, Chemical, Spent from destructive testing, NA3356	D005	9	Frank's Vacuum Truck Service EPA ID# NYD982792814	5173	4
Waste Dyes, Liquid, Toxic, nos (chromium), UN1602	D007	6.1	Frank's Vacuum Truck Service EPA ID# NYD982792814	447	1
Waste Corrosive Solid, basic, inorganic, nos (sodium hydroxide), UN3266	D002	8	Frank's Vacuum Truck Service EPA ID# NYD982792814	1252	3
Waste Corrosive Liquid, Oxidizing, N.O.S. (Acid/Oxidizer Labpack - Sulfuric Acid, Nitrates), UN 3093, PG II	D001/D002/ D005	8	Frank's Vacuum Truck Service EPA ID# NYD982792814	697.4	3
Waste Lithium Hydroxide, Solid, UN2680	D002	8	Frank's Vacuum Truck Service EPA ID# NYD982792814	1905	4
Waste batteries, wet, non-spillable, RQ UN2800, PGIII, N.O.S., 8, (lead acid battery)	D002/D008	8	Frank's Vacuum Truck Service EPA ID# NYD982792814	37	1
Waste batteries, dry, containing potassium hydroxide, solid, RQ UN3028, PGIII, N.O.S., 8, (phosphoric acid)	D006	8	Frank's Vacuum Truck Service EPA ID# NYD982792814	28	1

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Efforts to Reduce Hazardous Waste Generation:

A no-turn core process has been developed to significantly reduce volume of our largest waste stream (currently about 50% of non waste water hazardous waste generated). In addition, a barium-free no-turn core formulation is in the engineering and prototye stages. Barium Free cores are currently being used for new clients (existing clients with older-style aircraft still require the barium-containng cores).

Hazardous Waste Reductions Realized:

	Tons Generated
CY 2001	32.19
CY 2002	26.00
CY 2003	22.99
CY 2004	31.13*
CY 2005	19.89
CY 2006	14.71
CY 2007	24.36
CY 2008	26.40
CY 2009	19.90
CY 2010	24.81

* Without the one-time remedial waste (11.55 tons), the total hazardous waste generated for CY 2004 would be 19.58 tons.

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."

Name William [illegible] Title Safety & Environmental Eng. Date 02/14/2011