



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

OFFICE OF
ENFORCEMENT AND COMPLIANCE
ASSURANCE

May 13, 2011

BRITT SCHEER
REYNOLDS METAL CO (GUM SPRING PLANT)
500 EAST REYNOLDS ROAD
ARCADELPHIA, AR 71923

Re: Foreign Notice ID: 11-121-EXP
EPA Notice ID: 002515/40/11

Dear BRITT SCHEER:

Under the requirements in 40 CFR §§ 264.71(a)(3) and 265.71(a)(3) owners and operators of hazardous waste treatment, storage, and disposal facilities receiving hazardous waste from a foreign source must submit a copy of documentation confirming EPA's consent to the import of the hazardous waste at the same time they submit a copy of the RCRA hazardous waste manifest within thirty (30) days of each import shipment's delivery.

This letter and attached notification serve as EPA's import consent documentation for the export of 6,000,000 Kilograms of SPENT POTLINERS from ALUMINERIE DE BECANCOUR INC., 5555 RUE PIERRE-THIBAUT, BECANCOR, QC, CANADA to REYNOLDS METAL CO (GUM SPRING PLANT), 500 EAST REYNOLDS ROAD, ARCADELPHIA, AR. Shipments may occur under EPA's consent to the attached notice from May 6, 2011, to May 6, 2012. This waste will be subject to all applicable federal and state laws and regulations.

Waste Stream 1: SPENT POTLINERS

Waste Description: SPENT POTLINERS

EPA Waste Code: K088

DOT Shipping Name: Aluminum smelting by-products or Aluminum remelting by-products

DOT Hazard Class: 4.3

DOT I.D. No. UN3170

Total Volume to be Exported: 6,000,000 Kilograms

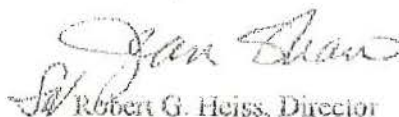
Estimated Frequency: 400 loads Annually

EPA is providing this letter and attachment for your potential use and recordkeeping because your facility is listed as a receiving facility or interim receiving facility in the attached notification. If your facility is not required to submit a copy of the import consent documentation along with the RCRA hazardous waste manifest under §§ 264.71(a)(3) or 265.71(a)(3) during the period of consent listed above, then you may discard this letter and attachment.

The EPA Waste Import and Export Tracking System ID assigned to this notice is 002315/01/11.

If you have any questions regarding this correspondence, please contact Jean Shaw at telephone: 202-564-7111, telefax: 202-564-0025, or email: shaw.jean@epa.gov.

Sincerely,



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

Attachment

cc: Mary Tucker
Regional Coordinator, Region 6

FACSIMILE COVER SHEET

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF FEDERAL ACTIVITIES
INTERNATIONAL COMPLIANCE AND ASSURANCE DIVISION
1200 PENNSYLVANIA AVENUE., N.W., Rm.6144
MAIL CODE 2254A
WASHINGTON, D.C. 20460

PHONE NUMBER: 202-564-7111
FAX NUMBER: 202-564-0025

TO: Britt Schoer

OFFICE: Reynolds Metal Company

PHONE NUMBER: _____

FAX NUMBER: 870-246-7344

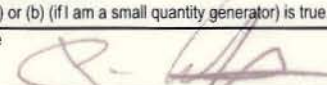
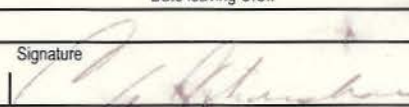
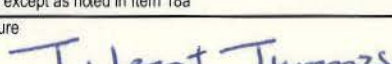
FROM: Jean Shaw
Import/Export Program

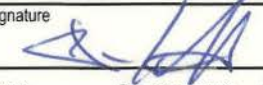
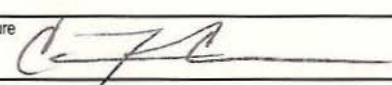

MAY 13 2011

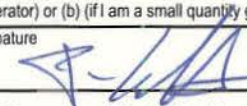

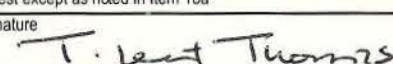
DATE:

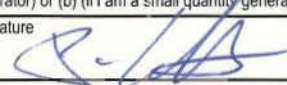
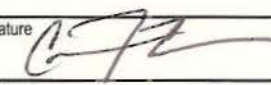
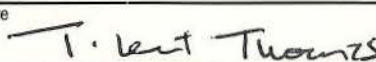
OF PAGES:
(including cover)

COMMENTS:

| | | | | | | | |
|--|---|---|--------------------------|--|---|------------------------------------|-----------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number ARD006354161 | 2. Page 1 of 1 | 3. Emergency Response Phone 1-800-424-9300 | 4. Manifest Tracking Number 000758658 GBF | | |
| 5. Generator's Name and Mailing Address ARCO-Deschambault Ltd. 1 boul. des sources Deschambault, Qc G0A 1S0 | | | | Generator's Site Address (if different than mailing address) Importer: Reynolds Metals Co. 500 East Reynolds road Arkadelphia, AR 71923 (870) 245-2734 | | | |
| Generator's Phone: (418) 288-5287 | | | | 2515/4E/11 | | | |
| 6. Transporter 1 Company Name Grand Trunk Western Railroad | | | | U.S. EPA ID Number MIT270010838 | | | |
| 7. Transporter 2 Company Name Union Pacific Railroad | | | | U.S. EPA ID Number NED001792910 | | | |
| 8. Designated Facility Name and Site Address Reynolds Gum Spring Plant 500 East Reynolds Road Arkadelphia, AR 71923 | | | | U.S. EPA ID Number ARD006354161 | | | |
| Facility's Phone: (870) 245-2734 | | | | | | | |
| GENERATOR | 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers | | 11. Total Quantity | 12. Unit Wt./Vol. | 13. Waste Codes |
| | | | No. | Type | | | |
| | 1. | Waste Aluminum smelting by-products, 4.3, UN3170 PGIII, RQ, (K088), DOT-E 11802, (spent potliners from primary aluminum reduction) | 3 | CM | 53830 | K | K088 |
| | 2. | Container CT-PAT Seals #1 CT-PAT Seals #2 | | | | | |
| | 3. | AQLU45165 414478 414478 PLRU23120 414475 414477 | | | | | |
| 4. | PLRU23129 414484 414485 | | | | | | |
| | | Canadian manifest : # 9467754-9 | | | | | |
| 14. Special Handling Instructions and Additional Information Container ID Number : AQLU45165 PLRU23120 PLRU23129 Railcar no Wt (kg) : 18550 17730 17650 TTCX93407 Posters 4.3 on | | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | | |
| Generator's/Offeror's Printed/Typed Name Pierre Marchand | | | | Signature  | | Month Day Year 1 25 2012 | |
| TRANSPORTER | 16. International Shipments <input checked="" type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: PORT-HURON Transporter signature (for exports only): Date leaving U.S.: | | | | | | |
| | 17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Massimiliano Crenshaw Signature  Month Day Year 1 31 12 Transporter 2 Printed/Typed Name Signature Month Day Year | | | | | | |
| DESIGNATED FACILITY | 18. Discrepancy | | | | | | |
| | 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: | | | | | | |
| | 18b. Alternate Facility (or Generator) U.S. EPA ID Number | | | | | | |
| | Facility's Phone: | | | | | | |
| | 18c. Signature of Alternate Facility (or Generator) Month Day Year | | | | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | |
| 1. H132 | | 2. H401 | | 3. | | 4. | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a | | | | | | | |
| Printed/Typed Name T. Kent Thomas | | | | Signature  | | Month Day Year 02 09 12 | |

| | | | | | | | | |
|---|---|---|-----------------------|---|---|-----------------------------------|----------------------------------|-----------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number ARD006354161 | 2. Page 1 of 1 | 3. Emergency Response Phone 1-800-424-9300 | 4. Manifest Tracking Number 000758659 GBF | | | |
| 5. Generator's Name and Mailing Address Arco Deschambault Ltd. 1 boul. des sources Deschambault, Qc G0A 1S0 | | Generator's Site Address (if different than mailing address) Imperial Reynolds Metals Co. 500 East Reynolds road Arkadelphia, AR 71923 (870) 245-2734 | | | | | | |
| Generator's Phone: (418) 286-5287 | | | | | | | | |
| 6. Transporter 1 Company Name Grand Trunk Western Railroad | | | | | U.S. EPA ID Number MIT270010838 | | | |
| 7. Transporter 2 Company Name Union Pacific Railroad | | | | | U.S. EPA ID Number NED001792910 | | | |
| 8. Designated Facility Name and Site Address Reynolds Gum Spring Plant 500 East Reynolds Road Arkadelphia AR71923 (870) 245-2734 | | | | | U.S. EPA ID Number ARD006354161 | | | |
| Facility's Phone: | | | | | | | | |
| GENERATOR | 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | | 10. Containers | | 11. Total Quantity | 12. Unit Wt./Vol. | 13. Waste Codes |
| | | | | No. | Type | | | |
| | 1. | Waste Aluminum smelting by-products, 4.3, UN3170 PGIII, RQ, (K088), DOT-E 11602, (spent potliners from primary aluminum reduction) | | 3 | CM | 56380 | K | K088 |
| | 2. | Container CT-PAT Seals # 1 CT-PAT Seals # 2 | | | | | | |
| | 3. | AOLU45549 822212 822213 PLRU23037 822214 822216 PLRU 23157 414490 414495 | | | | | | |
| | | Canadian manifest : # 9467755-6 | | | | | | |
| 14. Special Handling Instructions and Additional Information Container ID Number : AOLU45549 PLRU23037 PLRU 23157 Ralcar no Wt (kg) : 18380 18040 19970 ATTX97672 Posters 4.3 on | | | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | | | |
| Generator's/Offor's Printed/Typed Name Pierre Marchand | | | | Signature  | | Month Day Year 2 7 2012 | | |
| INT'L | 16. International Shipments <input checked="" type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: PORT-HURON Transporter signature (for exports only): Date leaving U.S.: | | | | | | | |
| | 17. Transporter Acknowledgment of Receipt of Materials | | | | | | | |
| TRANSPORTER | Transporter 1 Printed/Typed Name Cassandra Crinshaw | | | | Signature  | | Month Day Year 2 13 12 | |
| | Transporter 2 Printed/Typed Name | | | | Signature | | Month Day Year | |
| DESIGNATED FACILITY | 18. Discrepancy | | | | | | | |
| | 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: | | | | | | | |
| | 18b. Alternate Facility (or Generator) U.S. EPA ID Number | | | | | | | |
| | Facility's Phone: | | | | | | | |
| | 18c. Signature of Alternate Facility (or Generator) Month Day Year | | | | | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | | |
| 1. H132/H061 | | | 2. | | 3. | | 4. | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a | | | | | | | | |
| Printed/Typed Name T. Kent Thomas | | | | Signature  | | Month Day Year 02 28 12 | | |

| | | | | | | | | |
|---|---|--|--------------------------|---|---|-----------------------------------|----------------------------------|-----------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number ARD006354161 | 2. Page 1 of 1 | 3. Emergency Response Phone 1-800-424-9300 | 4. Manifest Tracking Number 000758660GBF | | | |
| 5. Generator's Name and Mailing Address Alcoa Deschambault Ltd. 1 boul. des sources Deschambault, Qc G0A 1S0 Generator's Phone: (418) 286-5287 | | | | Generator's Site Address (if different than mailing address) Importer: Reynolds Metals Co. 500 East Reynolds road Arkadelphia, AR 71923 (870) 245-2734 2515/45/11 | | | | |
| 6. Transporter 1 Company Name Grand Trunk Western Railroad | | | | U.S. EPA ID Number MIT270010838 | | | | |
| 7. Transporter 2 Company Name Union Pacific Railroad | | | | U.S. EPA ID Number NED001792910 | | | | |
| 8. Designated Facility Name and Site Address Reynolds Gum Spring Plant 500 East Reynolds Road Arkadelphia AR71923 Facility's Phone: (870) 245-2734 | | | | U.S. EPA ID Number ARD006354161 | | | | |
| GENERATOR | 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | | 10. Containers No. Type | | 11. Total Quantity | 12. Unit Wt./Vol. | 13. Waste Codes |
| | | 1. Waste Aluminum smelting by-products, 4.3, UN3170 PGIII, RQ, (K088), DOT-E 11602, (spent potliners from primary aluminum reduction) | | 3 CM | | 53620 | K | K088 |
| | | 2. Container CT-PAT Seals # 1 CT-PAT Seals # 2 | | | | | | |
| | | 3. PLRU91572 414498 822211 PLRU23086 414488 414489 | | | | | | |
| | | 4. PLRU106544 414488 414487 Canadian manifest : # 9467756-4 | | | | | | |
| 14. Special Handling Instructions and Additional Information Container ID Number : PLRU91572 PLRU23086 PLRU106544 Railcar no Wt (kg) : 18010 17700 17910 VTTX92290 Posters 4.3 on | | | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | | | |
| Generator's/Offeror's Printed/Typed Name Pierre Marchand | | | | Signature  | | Month Day Year 2 7 2012 | | |
| INT'L | 16. International Shipments <input checked="" type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: PORT-HURON Date leaving U.S.: _____ | | | | | | | |
| | 17. Transporter Acknowledgment of Receipt of Materials | | | | | | | |
| TRANSPORTER | Transporter 1 Printed/Typed Name Cassandra Crenshaw | | | | Signature  | | Month Day Year 2 13 12 | |
| | Transporter 2 Printed/Typed Name | | | | Signature | | Month Day Year | |
| DESIGNATED FACILITY | 18. Discrepancy | | | | | | | |
| | 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____ | | | | | | | |
| | 18b. Alternate Facility (or Generator) U.S. EPA ID Number | | | | | | | |
| | Facility's Phone: _____ | | | | | | | |
| | 18c. Signature of Alternate Facility (or Generator) Month Day Year | | | | | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | | |
| 1. H132 / H061 | | 2. | | 3. | | 4. | | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a | | | | | | | | |
| Printed/Typed Name T. Kent Thomas | | | | Signature  | | Month Day Year 02 28 12 | | |

| | | | | | | | | |
|---|---|---|--|---|---|------------------------------------|----------------------------------|-----------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number ARD006354161 | 2. Page 1 of 1 | 3. Emergency Response Phone 1-800-424-9300 | 4. Manifest Tracking Number 000758661 GBF | | | |
| 5. Generator's Name and Mailing Address Alcoa Deschambault Ltd. 1 boul. des sources Deschambault, Qc G0A 1S0 (418) 286-5287 | | | Generator's Site Address (if different than mailing address) Importer: Reynolds Metals Co. 500 East Reynolds road Arkadelphia, AR 71923 (870) 245-2734 | | | | | |
| 6. Transporter 1 Company Name Grand Trunk Western Railroad | | | | U.S. EPA ID Number MIT270010838 | | | | |
| 7. Transporter 2 Company Name Union Pacific Railroad | | | | U.S. EPA ID Number NED001792910 | | | | |
| 8. Designated Facility Name and Site Address Reynolds Gun Spring Plant 500 East Reynolds Road Arkadelphia AR71923 (870) 245-2734 | | | | U.S. EPA ID Number ARD006354161 | | | | |
| Facility's Phone: | | | | | | | | |
| GENERATOR | 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | | 10. Containers | | 11. Total Quantity | 12. Unit Wt./Vol. | 13. Waste Codes |
| | | | | No. | Type | | | |
| | 1. | Waste Aluminum smelting by-products, 4.3, UN3170 PGIII, RQ, (K088), DOT-E 11602, (spent potliners from primary aluminum reduction) | | 3 | CM | 56910 | K | K088 |
| | 2. | Container CT-PAT Seals #1 CT-PAT Seals #2 | | | | | | |
| | 3. | PLRU22942 822206 822206 PLRU22985 822203 822204 | | | | | | |
| | 4. AQLU45550 822201 822202 | | | | | | | |
| | | Canadian manifest : # 9467694-7 | | | | | | |
| 14. Special Handling Instructions and Additional Information | | | | | | | | |
| | | Container ID Number : | | PLRU22942 | PLRU22985 | AQLU45550 | Railcar no | |
| | | Wt (kg) : | | 19550 | 17480 | 19880 | VTTX 93480 | |
| | | Posters 4.3 on | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | | | |
| Generator's/Offor's Printed/Typed Name Pierre Marchand | | | | Signature  | | Month Day Year 2 13 2012 | | |
| INT'L | 16. International Shipments <input checked="" type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: PORT-HURON | | | | | | | |
| | Transporter signature (for exports only): Date leaving U.S.: | | | | | | | |
| TRANSPORTER | 17. Transporter Acknowledgment of Receipt of Materials | | | | | | | |
| | Transporter 1 Printed/Typed Name Cassandra Crenshaw | | | | Signature  | | Month Day Year 2 23 12 | |
| | Transporter 2 Printed/Typed Name | | | | Signature | | Month Day Year | |
| DESIGNATED FACILITY | 18. Discrepancy | | | | | | | |
| | 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection | | | | | | | |
| | Manifest Reference Number: | | | | | | | |
| | 18b. Alternate Facility (or Generator) | | | | U.S. EPA ID Number | | | |
| | Facility's Phone: | | | | | | | |
| | 18c. Signature of Alternate Facility (or Generator) | | | | Month Day Year | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | | |
| 1. H132/H061 | | 2. | | 3. | | 4. | | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a | | | | | | | | |
| Printed/Typed Name T. Kent Thomas | | | | Signature  | | Month Day Year 02 29 12 | | |