

CHEMTRON CORPORATION

SPRING 2006 NEWSLETTER

The Chemtron Mission

We offer you:

A single source for complete environmental services

A highly trained and experienced staff of dedicated environmental professionals

Innovative yet cost-effective solutions to your dynamic environmental challenges

A steadfast commitment to protect the environment

Inside this issue:

Chemtron Explores Asian Market 1

Is the Container Empty or Not? 2

U.S. EPA Releases Major Rule Change 3

Upcoming Compliance Dates 3

Upcoming Training Dates 4



CHEMTRON CORPORATION

35850 Schneider Court
Avon, Ohio 44011

Customer Service
Phone 440.933.6348
Fax 440.933.9500

www.chemtron-corp.com



CHEMTRON EXPLORES ASIAN MARKET



Chemtron Corporation participated in the Pollutec China 2006 Environmental Expo, held in Shanghai, China on March 8, 9, and 10. As one of the largest environmental conferences in Asia, Pollutec 2006 brought together environmental specialists, Chinese government officials, and the Chinese Government's EPB (Environmental Protection Bureau).

As China's economy continues to grow at unprecedented rates, it is being confronted with ecological degradation from pollution and improper management practices.

As economic development and manufacturing has sped up exponentially, too little attention has been paid to environmental protection, thus, resulting in laws not being enforced, as well as, widespread violations of existing laws. New efforts will target polluting enterprises on basic waste management practices. Corporate responsibility is a major priority to Chinese government officials.

Chemtron's participation in Pollutec 2006 was the kick-off of an initiative to understand and explore opportunities in China. This initiative is designed to provide Chemtron's clients with the same level of environmental services and support for their international operations as they have become accustomed to in the United States for the past 25 years.

"As more and more of Chemtron's clients establish international operations, we are exploring ways to support them in the creation and implementation of compliant and corporately consistent environmental programs," said Mike Guenther, Chemtron's VP of Sales and Business Development. "Ultimately, our goal is to have a TSDF (Treatment, Storage, Disposal Facility) strategically located in a major manufacturing zone to provide on-site management, removal, and disposal services."

As many of Chemtron's clients manufacture over-the-counter consumer products, from personal products to pharmaceuticals, they will require safe, secure destruction of unwanted manufacturing over-runs and return goods

to prevent them from entering the market. Therefore, Chemtron is also exploring the development of an assured destruction program in a secure return goods handling facility with product shredding and recycling capabilities.

Chemtron has partnered with the global business facilitators at the Baltimore based, Cooper Wallace LLC, in order to develop a network of support with Chinese government officials, Environmental Protection Bureau of China, and U.S. Government Agencies operating in China. Cooper Wallace's expertise in the Chinese market - ranging from legal analysis of local government laws to project evaluation and response implementation - has proven to be a major asset in initiating Chemtron's goals in China and other international markets.

Guenther says that "Chemtron's 25 year commitment to providing world class environmental services has taken the next logical step by exploring worldwide opportunities to serve our existing clients and to provide our services to new clients, wherever they may be."

"CHINA TO STEP UP ENVIRONMENTAL PROTECTION EFFORTS"

CHEMTRON: YOUR SINGLE SOURCE FOR ENVIRONMENTAL SERVICES



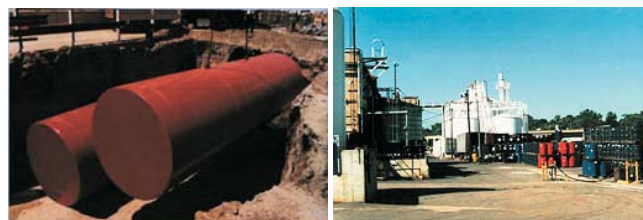
U.S. EPA RELEASES MAJOR RULE CHANGE

On April 4, 2006, U.S. EPA published its final RCRA Burden Reduction Rule. The rule became effective May 4, 2006. U.S. EPA made changes in the RCRA hazardous waste program to reduce the paperwork burden imposed on states and the regulated community.

The rule addresses: (1) the amount of time records must be kept, (2) certification by professional engineers, (3) the option to follow the Integrated Plan Guidance, (4) the option of following OSHA regulations for emergency training, (5) clarifications and elimination of

obsolete regulatory language, (6) elimination of selected recordkeeping and reporting requirements, (7) decreased self-inspection frequency for selected hazardous waste management units, (8) selected changes to the requirements for records retention and submittals of records, (9) changes to the requirements for document submittal, and (10) reduced frequency for report submittals.

Ohio has not adopted the rule. Check with your state environmental agency to see if the rule has been adopted by your state.



UPCOMING COMPLIANCE DATES

The following compliance dates occur during the second quarter 2006:

April 15

Title V Emissions Report & Emissions Inventory Summary.

April 15

Synthetic Minor Title V Emission Report.

April 30

Title V Certification (Ohio)

July 1

SARA Title III, Form R, and fee.

July 1

Hazardous Material Registration Statement and Fee

The Hazardous Materials Registration Statement and Fee is a compliance date that is most often missed. A company that offers a shipment in other than a bulk packaging of 2,268 kilograms (5,000 pounds) gross weight or more than one class of hazardous materials (including hazardous wastes) for which placarding of a vehicle, rail car, or freight container is required to register. This includes, for

example, a generator who ships 5,000 lbs. or more of flammable materials.

If you have questions as to whether any of these compliance dates apply to your company, call your Chemtron Territory Manager or Customer Service Representative today.





IS THE CONTAINER EMPTY OR NOT?



The next two definitions for containers less than or greater than 110 gallons hold true only when all wastes have been removed that can be removed using the practices commonly employed.

If the container or the inner liner is less than or equal to 110 gallons in size, the container would be RCRA empty when the container has no more than 3% by weight of the total capacity of the container remaining in the container or inner liner.

If the container or the inner liner is greater than 110 gallons in size, the container would be RCRA empty when the container has no more than 0.3% by weight of the total capacity of the container remaining in the container or inner liner.

For containers or inner liners that hold acutely hazardous wastes (§§261.31, .32, or .33(e)), the container is empty when the container or inner liner has been triple rinsed using a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate. The rinseate from all three rinses should be collected and managed as a hazardous waste using the RCRA hazardous waste number of the acutely hazardous waste being rinsed from the container.

For example, if a container contained P004 (aldrin), the container would be rinsed three times with a solvent that could remove the aldrin. The rinseate would carry the P004 hazardous waste number plus any other hazardous waste number for the rinseate, if applicable.



When working with a container with a waste material in it, when can you consider the container empty? U.S. EPA answers the question in 40 C.F.R. §261.7.

Non-Acutely Hazardous Wastes

For containers or inner liners that hold hazardous wastes other than compressed gases or acutely hazardous wastes (§§261.31, .32, or .33(e)), the container is empty when "all wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating and no more than 2.5 centimeters (one inch) of residue remain on the bottom of the container.

A paint container, for example, would not be eligible to be RCRA empty until it is tipped and all possible paint was removed. The container would become RCRA empty once all paint is removed and no more than one inch of material remains on the bottom of the container.

Under both of these rules for containers less than or greater than 110 gallons, the generator would need to make calculations to determine when the container is empty. In addition, the generator should have a scale to determine the weight left in the container or be able to demonstrate the weight by calculation.

Compressed Gases

For containers that hold hazardous wastes that are compressed gases, the container is empty when the pressure approaches atmospheric. This would apply in the case of gas cylinders, LP gas containers, or aerosol cans.

Acutely Hazardous Wastes

The acutely hazardous wastes are F020-F023, F026, F027, all P-codes, and all K-codes with an "H" in parenthesis after the hazardous waste description.

The generator may also clean the container or inner liner with another method that has been shown in scientific literature or by tests conducted by the generator to achieve removal.

The final option for the generator is to remove the liner that prevented the acutely hazardous waste from contacting the container.

Summary

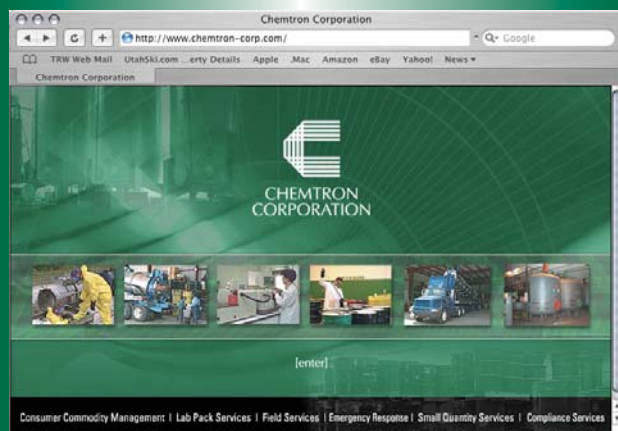
The answer to when a container holding hazardous waste is empty lies in answering what the container held and what is the container size. Once both of these questions are answered, the generator can determine what needs to be done to make the container RCRA empty.





SPRING 2006 NEWSLETTER

www.chemtron-corp.com



WE ARE ON THE WEB!



35850 Schneider Court
Avon, Ohio 44011

Customer Service
Phone 440.933.6348
Fax 440.933.9500

CHEMTRON CORPORATION IS A FULL SERVICE PART-B PERMITTED TREATMENT, STORAGE, AND DISPOSAL FACILITY.

Chemtron's services include:

- Waste Disposal Services
- Waste Analysis Services
- Turnkey Lab Pack Services
- Commodities Management Services
- 24-hour Emergency Response Services.
- Remediation Services
- Industrial Cleaning Services
- Training Services (OSHA, RCRA, & DOT)
- Comprehensive Compliance Services Programs
- Full Line of Sorbent Products

Chemtron also offers total waste management programs tailored to fit your needs. Contact your Chemtron representative for more information.

Call us today at 440-933-6348 or visit us on the web at www.chemtron-corp.com.

UPCOMING TRAINING DATES

- | | |
|---------------|---------------------------|
| June 22: | 8-hour Hazwoper Refresher |
| June 23: | RCRA Refresher |
| June 23: | DOT Refresher |
| September 21: | 8-hour Hazwoper Refresher |
| September 22: | RCRA Refresher |
| September 22: | DOT Refresher |
| December 7: | 8-hour Hazwoper Refresher |
| December 8: | RCRA Refresher |
| December 8: | DOT Refresher |



CALL US



Contact Michelle Haynes at 440-933-6348 extension 3359 to sign up for these classes or to inquire about how Chemtron can fulfill your other training needs. Classes are located at Chemtron's training facility in Avon Lake, Ohio.