

26 SEP. 1994

**SIPSY FRANCE**

**F - ENVIRONMENTAL IMPACT ANALYSIS**

We certify that **LOTEPREDNOL ETABONATE** manufactured by **SIPSY FRANCE** is produced according to the local regulations concerning :

- safety of workers
- safety of installations
- waste disposal
- environmental agency

The plant is regularly inspected by our local representatives to check the compliance with these regulations

**GENERAL MANAGER OF SIPSY**

  
**JF. MARCOPOULOS**

**BAUSCH  
& LOMB**

Healthcare and Optics  
Worldwide

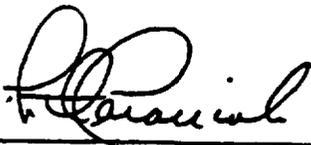
December 19, 1996

**Compliance Statement**

Bausch & Lomb Pharmaceuticals, Inc. states that it is in full compliance with, or on an enforceable schedule to be in compliance with, all emission requirements set forth in permits, consent decrees and administrative orders applicable to the production of

**Ioteprednol etabonate 0.2% ophthalmic suspension**

at its facilities in Tampa FL as well as emission requirements set forth in applicable federal, state, and local statutes and regulations applicable to the production of Ioteprednol etabonate 0.2% ophthalmic suspension at its facilities in Tampa FL.



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Anthony Caracciolo  
Vice President, Operations.

Industry Name Bausch & Lomb Pharmaceutical

Permit No. 1072

**Acceptance of Permit**

Bausch & Lomb Pharmaceutical  
(name of company) accepts the conditions of the permit and  
agrees to meet the conditions herein.

Permit period: June 1, 1996 through May 31, 1998

By  6/26/96  
(signature) (date)

\*Name Anthony Caracciolo

Title Vice-President of Operations

\* Must be the owner or an authorized representative of the company.

(Return this signed page to the Industrial Waste Division)



# CITY OF TAMPA

Department of Sanitary Sewers

Howard F. Curren  
Advanced Wastewater Treatment Plant

Mr. Anthony Caracciolo  
Bausch & Lomb Pharmaceutical  
8500 Hidden River Parkway  
Tampa, FL 33637

June 18, 1996

Re: Issuance of a Wastewater Discharge Permit to Bausch & Lomb Pharmaceutical, by the City of Tampa, Department of Sanitary Sewers.

Dear Mr. Caracciolo:

The enclosed issued permit, No. 1072, governs the wastewater discharge from the facility located at 8500 Hidden River Parkway, Tampa, Florida 33637, into the City of Tampa's wastewater collection system. All discharges from this facility and actions and reports relating thereto shall be in accordance with the terms and conditions of this permit.

The discharge permit is attached to this letter. I am enclosing two copies of the front page of the discharge permit with a block reserved for your signature indicating acceptance of the limitations and conditions specified in this permit. Please sign both copies of the front page of the permit and return one of the signed copies to John M. Daily, City of Tampa, Industrial Waste Division, 2700 Maritime Blvd., Tampa, FL 33605.

If you have any questions about this permit please do not hesitate to contact John M. Daily at 247-3451.

Sincerely,

Ralph L. Metcalf II, P.E.  
Director  
Department of Sanitary Sewers

RLM:jmd

**CITY OF TAMPA**  
**DEPARTMENT OF SANITARY SEWERS**  
**INDUSTRIAL WASTEWATER DISCHARGE PERMIT**

City of Tampa  
Department of Sanitary Sewers  
Industrial Wastewater Discharge Permit  
Cover Page

Permit No. 1072

In accordance with the provisions of Section 26-122 of the City of Tampa Code:

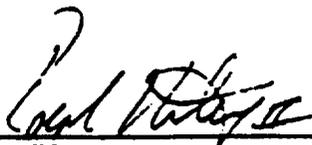
Company Name Bausch & Lomb Pharmaceutical  
Address 8500 Hidden River Parkway  
Telephone Number 975-7700  
Name of Applicant Anthony Caracciolo

Is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the City of Tampa sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards or requirements under local, State, and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of Tampa sewer use ordinance.

This permit shall become effective on June 1, 1996  
and shall expire at midnight on May 31, 1998

If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit a minimum of 90 days prior to the expiration date.

  
\_\_\_\_\_  
Director  
Department of Sanitary Sewers

6/18/96  
\_\_\_\_\_  
Date

**PART 1 - APPLICABLE EFFLUENT LIMITATIONS**

**SECTION 1 - EFFLUENT DISCHARGE LIMITS**

- A. During the period of this permit, the permittee is authorized to discharge process wastewater to the City of Tampa from only the outfalls listed below.

Description of outfalls:

<u>Outfall</u>	<u>Description</u>
001	Outfall 001 is the manhole located in the grass at the southwest corner of the facility. All process, laboratory, and sanitary wastewater is discharged to the city of Tampa from this outfall.
002	Outfall 002 is the manhole located in the grass on the east side of the facility. Only the process wastewater storage tanks discharge to this manhole.
003	Outfall 003 is the manhole located in the grass on the east side of the facility. Only the neutralizing basin discharges to this manhole.

- B. During the period of this permit the discharge from outfall 002 must comply with the following pretreatment regulations established in 40 CFR Part 439 (Pharmaceutical Manufacturing Point Source Category), Subparts C and D.

40 CFR Part 439 - Pharmaceutical Manufacturing Point Source Category  
 Subpart C - Chemical Synthesis Products Subcategory,  
 439.37 - Pretreatment Standards for New Sources (PSNS), and  
 Subpart D - Mixing/Compounding and Formulation Subcategory,  
 439.47 - Pretreatment Standards for New Sources (PSNS)

<u>Pollutant</u>	<u>Max for any 1 day</u> (mg/l)	<u>Average of daily values for</u> <u>30 consecutive days</u> (mg/l)
Total cyanide	33.5	9.4

Industry Name

Bausch & Lomb Pharmaceutical

Permit No. 1072

C. During the period of this permit the discharge from outfall 001 shall not exceed the following effluent limitations. In addition, the discharge shall comply with all applicable regulations and standards contained in chapter 26, City of Tampa code.

<u>Parameter</u>	<u>Daily Max.</u> (mg/l)	<u>Monthly Avg.</u> (mg/l)
Arsenic, (As)	0.1	0.05
Barium, (Ba)	10.0	5.0
Cadmium, (Cd)	0.4	0.2
Chromium, (Cr, total)	5.0	2.5
Copper, (Cu)	3.6	1.8
Lead, (Pb)	0.6	0.3
Manganese, (Mn)	2.0	1.0
Mercury, (Hg)	0.01	0.005
Nickel, (Ni)	3.6	1.8
Selenium, (Se)	0.04	0.02
Silver, (Ag)	1.0	0.5
Zinc, (Zn)	3.6	1.8
Oil & Grease	100.0	100.0
Cyanide, Total	1.0	1.0
pH	6.0 - 11.0	6.0 - 11.0
Total Purgeable Organics Base/Neutrals and Acids	100 ug/l MDL	100 ug/l MDL

**PART 2 - MONITORING AND REPORTING REQUIREMENTS**

**SECTION 1 - MONITORING REQUIREMENTS**

A. During the period of this permit, the permittee shall monitor outfall 001 for the following:

<b>Parameter</b>	<b>Location</b>	<b>Frequency</b>	<b>Sample Type</b>
Flow, gpd	(1)	Monthly	(2)
pH	(1)	(3) Semi-annually	(4) Grab
Cadmium, mg/l	(1)	(3) Semi-annually	(4) Composite
Chromium, mg/l	(1)	(3) Semi-annually	(4) Composite
Copper, mg/l	(1)	(3) Semi-annually	(4) Composite
Lead, mg/l	(1)	(3) Semi-annually	(4) Composite
Nickel, mg/l	(1)	(3) Semi-annually	(4) Composite
Zinc, mg/l	(1)	(3) Semi-annually	(4) Composite
Total Cyanide, mg/l	(5)	(3) Semi-annually	(4) Grab
Purgeable Organics	(1)	(3) Semi-annually	(4) Grab
Base/Neutrals and Acids	(1)	(3) Semi-annually	(4) Grab
Base and Neutral Extractables			
Polychlorinated Biphenyls			
Acid Extractables			
Additional Extractables			

(1) - Outfall 001

(2) - Flows shall be read on the first business day of each month from the permittees wastewater discharge flow meter.

(3) - April, October

(4) - Definitions of sample types are located in PART 4 SECTION 1 of this permit.

(5) - Outfall 001 and outfall 002

Industry Name Bausch & Lomb Pharmaceutical

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- B. All activities related to sampling and analysis shall comply with Chapter 62-160, F.A.C. Sampling activities and laboratory analyses shall be performed according to procedures specified in "The Department of Environmental Regulation Standard Operating Procedures for Laboratory Operations and Sample Collection Activities" (DER-QA-001/92) September 1992 ( see PART 4 SECTION 4 Paragraph A).. Alternatively, an organization with the required protocols listed in their Department Approved Comprehensive Quality Assurance Plan may sample and analyze according to the protocols specified in that document. Purgeable Organics shall be analyzed in accordance with EPA Method 624. Base/Neutrals and Acids shall be analyzed in accordance with EPA Method 625. The Method Detection Limits (MDL) for Purgeable Organics and Base/Neutrals and Acids shall be units of ug/l (micrograms per liter).

## SECTION 2 - REPORTING REQUIREMENTS

### A. Monitoring Reports

1. Analytical monitoring results obtained shall be summarized and reported as follows:

- a. Parameters monitored semi-annually shall be reported within the month following the reported period. The report shall also include the monthly process wastewater discharge flows and the average daily process wastewater discharge flow for the reported period

- B. Pursuant to the reporting requirements of 40 CFR Part 403.12 (g), the results of all monitoring performed more frequently than required by this permit, using test procedures approved under 40 CFR Part 136, shall be submitted with the report.

- C. When a self-monitoring report shows any violation of the applicable standards included in PART 1 of this permit, the permittee must resample and submit both results within 30 days of receiving original sample results, except the permittee is not required to resample if:

- (1) The Control Authority performs sampling at the permittee at a frequency of at least once per month, or
- (2) The Control Authority performs sampling at the permittee between the time when the permittee performs its initial sampling and the time when the permittee receives the results of this sampling.

The permittee must notify the Industrial Waste Division within 24 hours of receipt of monitoring results if the results indicate any violation of applicable standards.

- D. Signatory requirements are established in PART 4 SECTION 4 (E) of this permit.

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**E. Accidental Discharge Report**

1. The permittee shall notify the City of Tampa, Industrial Waste Section, immediately upon its having knowledge of the occurrence of an accidental discharge of substances regulated by this permit or prohibited by Chapter 26, City of Tampa Code. At all times the City of Tampa, Industrial Waste Section shall be notified by telephone at (813) 247-3451. The notification shall include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken.
2. Within five days following such notice, the permittee shall submit to the City of Tampa AWTP a detailed written report. The report shall specify:
  - a. Description and cause of the upset, slug or accidental discharge, the cause thereof, and the impact on the permittee's compliance status. The description should also include location of discharge, type, concentration and volume of waste.
  - b. Duration of noncompliance, including exact dates and times of noncompliance, and if the noncompliance continues, the time by which compliance is reasonably expected to occur.
  - c. All steps taken or to be taken to reduce, eliminate, and prevent recurrence of such an upset, slug, accidental discharge, or other conditions of non-compliance.
  - d. All reports required of this permit shall be submitted to:

City of Tampa  
Industrial Waste Section  
2700 Maritime Blvd.  
Tampa, FL 33605.

**PART 3 - SPECIAL CONDITIONS / COMPLIANCE SCHEDULES**

1. None

## **PART 4 - STANDARD CONDITIONS**

### **SECTION 1 - DEFINITIONS**

- A. **AWTP** - Advanced Wastewater Treatment Plant
- B. **Composite sample** - shall mean a minimum of eight (8) grab samples collected at equally spaced one (1) hour intervals, per operating shift, and proportioned according to flow. The use of a properly operated automatic composite sampler is acceptable.
- C. **Daily maximum** - the maximum allowable discharge concentration of pollutant during a calendar day.
- D. **Grab sample** - for monitoring requirements, is defined as an individual sample which is taken from a waste stream on a one-time basis with no regard to the flow in the waste stream and without consideration of time. Daily pH monitoring may be performed by either grab sample or continuous pH electrometric probe monitoring.
- E. **Monthly average** - the maximum allowable value for the average of all observations obtained during one calendar month.
- F. **POTW** - Publicly Owned Treatment Works

### **SECTION 2 - GENERAL CONDITIONS**

#### **A. Duty to Comply**

The permittee must comply with all conditions of this permit. Failure to comply with the requirements may be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief and summary abatements.

#### **B. Duty to Mitigate**

The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment, public health or POTW resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the non-complying discharge.

**C. Permit Action**

This permit may be modified, revoked and reissued, or terminated for causes including, but not limited to, the following:

- Violation of any terms or conditions of this permit;
- Transfer of ownership;
- Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts;
- A change in any condition of the discharge that requires either a temporary or permanent reduction or elimination of the authorized discharge;
- Information indicating that the permitted discharge poses a threat to human health or welfare, or property real;
- Upon request of the permittee, provided such request does not create a violation of any existing applicable requirements, standards, laws, or rules and regulations;
- Material or substantial alterations or additions to the dischargers operation that adversely impact the wastewater discharge and which were not in existence as of the date of the issued permit;
- To incorporate any new or revised Federal, State, or City pretreatment standards or requirements, to protect the operation of the treatment plant;
- Wastewater discharge volumes that have an average change of 20% or more during a six month period. (For new industries, the baseline monitoring report can be used to determine if an average change in discharge volume has exceeded 20% during the first six months of operation.)

The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

**D. Property Rights**

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

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**E. Severability**

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

**F. Limitation on Permit Transfer**

Wastewater discharge permits are issued to a specific user for a specific operation and are not assignable or transferable to any other user. The permittee must inform the City of Tampa at least thirty (30) days in advance of all proposed owner/operator transfers.

**G. Dilution**

No Permittee shall increase the use of potable or process water, or in any way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

**H. Duty To Reapply**

If the permittee desires to continue to discharge after the expiration of this permit, the permittee shall reapply on the application forms then in use at least ninety (90) days before this permit expires. Under no circumstances shall the permittee continue to discharge after the expiration of the permit, unless reapplication was submitted as required. Continued discharge under the conditions of the expired permit is authorized until the new permit is issued.

**I. Personnel Safety**

The permittee shall provide safe inspection conditions for city pretreatment program personnel and shall provide such personnel with all necessary safety information regarding the facility's safety policy pertaining to required personal safety gear.

**SECTION 3 - OPERATIONS AND MAINTENANCE OF POLLUTION CONTROLS**

**A. Proper Operation and Maintenance**

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes but is not limited to: effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

**B. Duty to Halt or Reduce Activity**

Upon reduction, loss or failure of the pretreatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control production or all discharges or both until operation of the pretreatment facility is restored. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**C. Bypass of Treatment Facilities**

1. Bypass is prohibited unless it is unavoidable to prevent loss of life, personal injury or severe property damage or no feasible alternative exists.
2. Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation.
3. Notification of bypass:
  - a. Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior written notice, if possible at least ten days before the date of the bypass, to the City of Tampa AWTP (addresses specified in PART 2 SECTION 2 (E) of this permit).
  - b. Unanticipated bypass. The permittee shall immediately notify the City of Tampa AWTP and submit a written notice to the City of Tampa AWTP within five days of the bypass as specified in PART 2 SECTION 2 (E) of this permit.

**D. Removed Substances**

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

**SECTION 4 - MONITORING AND RECORDS****A. Representative Sampling**

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. The sampling shall be done on a day of normal to maximum process operation. All samples shall be taken at the monitoring points specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other wastestream, body of water or substance. Monitoring points shall not be changed without notification to and the approval of the City of Tampa.

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**B. Inspection and Entry**

The permittee shall allow the City of Tampa, or an authorized representative, upon the presentation of a City of Tampa employee photo-identification card, to:

- Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- Have access to and copy any records that must be kept under the conditions of this permit;
- Inspect any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit;
- Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location;
- Inspect any production, manufacturing, fabricating or storage area where pollutants, regulated under the permit, could originate.

**C. Retention of Records**

1. The permittee shall retain records of all monitoring information, including all calibration and maintenance records, all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurement, report or application. This period may be extended by request of the City of Tampa at any time.
2. All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the City of Tampa shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

**D. Record Contents**

Records of sampling information shall include:

- The date, exact place, time and methods of sampling or measurements, and sample preservation techniques or procedures;
- Who performed the sampling or measurements;

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- The date(s) analyses were performed;
- Who performed the analyses;
- The analytical techniques or methods used;
- The results of such analyses; and
- Proper chain of custody documentation.

**E. Signatory Requirements**

All applications, permits, reports or information submitted to the City of Tampa shall be signed and certified as indicated below:

1. By the owner or an authorized representative of the industrial user. An authorized representative of an industrial user shall mean:
  - a. A president, secretary, treasurer or vice president of a corporation in charge of a principal business function, or any person who performs a similar policy- or decision-making function for the corporation.
  - b. A manager of one or more manufacturing, production or operation facilities employing more than 250 persons, or having gross annual sales or expenditures exceeding \$25 million dollars, if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
  - c. A general partner or proprietor if the industrial user is a partnership or sole proprietorship respectively.
  - d. A duly authorized representative of a person indicated in (a), (b) or (c) above if authorization has been made in writing on a prescribed authorization form submitted to the City of Tampa Industrial Waste Section. (Should authorization no longer be accurate because a different individual or position has responsibility for environmental matters for the company, a new authorization form for the new representative must be submitted to the City of Tampa Industrial Waste Section.)
2. Certification. Any person signing a document required by this permit shall make the following certification:

"I certify under penalty of law that I am familiar with the information contained in this report and its attachments and that to the best of my knowledge and belief such information is true, complete and accurate."

3. Any change in signature shall be submitted to the City of Tampa writing within 30 days after the change.

**F. Falsifying Information**

Knowingly making any false statement on any report or other document required by this permit, or knowingly rendering any monitoring device or method inaccurate, or not sampling a representative wastewater stream, may result in punishment under criminal law proceedings as well as being subjected to civil penalties and injunctive relief.

**SECTION 5 - ADDITIONAL REPORTING REQUIREMENTS**

**A. Planned Changes**

The permittee shall give notice to the City of Tampa 90 days prior to any facility expansion, production increase, or process modifications which results in new or increased discharge volumes that have an average change of 20% or more, over a six month period or which results in a change in the nature of the discharge. The baseline monitoring report can be used to determine if an average change in discharge volume or production has exceeded 20% during the first six months of operation.

**B. Duty to Provide Information**

The permittee shall furnish to the City of Tampa, within a reasonable time, any information which the City of Tampa may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the City of Tampa upon request, copies of records required to be kept by this permit.

**SECTION 6 - ENFORCEMENT**

**A. Recovery of Costs Incurred**

The permittee violating any of the provisions of this permit, Chapter 26, City of Tampa Code, or causing a discharge producing a deposit or obstruction, or causing damage to or otherwise inhibiting the City's wastewater disposal system shall be liable to the City for any expense, loss, or damage caused by such violation or discharge. The City shall bill the permittee for the costs incurred for any cleaning, repair, or replacement work caused by the violation or discharge. Refusal to pay the assessed costs shall constitute a violation of this permit and Chapter 26, City of Tampa Code.

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**B. Civil and Criminal Liability**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for non-compliance under Chapter 26, City of Tampa Code.

**C. Penalties for Violations**

1. Pursuant to Chapter 1, City of Tampa Code, any person who violates a permit condition is subject to a civil penalty not to exceed \$1000 per day, or by imprisonment for a period not exceeding six (6) months or by both. Each day any such violation shall continue shall constitute a separate offense and shall be punished as such.
2. The Director of the Sanitary Sewer Department shall endeavor to assure compliance with the requirements of Chapter 26, City of Tampa Code. If such efforts, over a reasonable period of time are futile, the Director shall take formal action to include but not limited to disconnection of water and sewer service.
3. In the event the permittee's discharge exceeds the limits established by this permit and thereby causes damage to the City of Tampa's infrastructure or causes violations of the AWTP discharge permits, or causes injury to any person or property, the permittee shall indemnify the City of Tampa for all costs, including court costs, Attorney's fee and liabilities incurred as a result of said discharge.
4. Issuance of this permit shall not relieve the permittee from complying with all applicable permits, laws, regulations and ordinances promulgated by the City or other governmental authorities. Nor shall issuance of this permit be construed as a representation by the City that the discharge permitted herein complies with all such permits, laws, regulations and ordinances.
5. Any non-compliance with this permit or Chapter 26, City of Tampa Code, shall be grounds for administrative action and/or enforcement proceedings including civil or criminal penalties, injunctive relief and summary abatements.

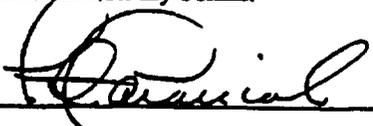
**AUTHORIZATION OF APPROVED REPRESENTATIVE**

**Industrial User Name** Bausch & Lomb Pharmaceutical  
**Address** 8500 Hidden River Parkway  
Tampa, FL 33637  
**Date** June 26, 1996  
**Discharge Permit No.** 1072

**To:** **Industrial Waste Division**  
**City of Tampa**  
**2700 Maritime Blvd.**  
**Tampa, FL 33605**

I, Anthony Caracciolo, hereby certify that I am a responsible corporate officer, manager, general partner or proprietor of the above named company and that I am in charge of principal business functions and am able to perform policy and decision making functions for the company.

I hereby duly authorize Elizabeth Ortiz, whose signature also appears below to be my representative. I authorize my representative to sign all Industrial Pretreatment self-monitoring certification statements on my behalf.

Signed 

Title Vice President, Operations

Signature of Authorized Representative 

Title of Representative Environmental Health & Safety Officer