September 25, 2019

USA Lamp & Ballast Recycling, Inc.
Dbx Cleanlites Recycling Inc.
665 Hull Road
P.O. Box 212
Mason, MI 48854

Re: USA Lamp & Ballast Recycling, Inc.
Director’s Final Findings and Orders
(DFFO)
DFFO
RCRA C - Hazardous Waste
Fulton County
OHR000108050

Subject: Final Findings and Orders of the Director

Dear Sir:

Transmitted herewith are the Final Findings and Orders of the Director concerning the matter indicated for USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc.

If you have any questions, please contact Sarah Miles at (614) 644-2840.

Sincerely,

Tonya Andrews, Administrative Professional 3
Division of Environmental Response & Revitalization

Enclosure

cc: Kristie Shipley, DERR, CO
Mitch Mathews, DERR, CO
Tammy Heffelfinger, DERR, CO
Brad Mitchell, DERR, CO
Colleen Weaver, DERR, NWDO
Sarah Miles, Legal
BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

USA Lamp & Ballast Recycling, Inc.
dba Cleanlites Recycling Inc.
715 West Linfoot Street
Wauseon, Ohio 43567

Director's Final Findings
and Orders

Respondent

PREAMBLE

It is agreed by the parties hereto as follows:

I. JURISDICTION

These Director’s Final Findings and Orders (Orders) are issued to USA Lamp &
Ballast Recycling, Inc. dba Cleanlites Recycling Inc. pursuant to the authority vested in the
Director of the Ohio Environmental Protection Agency (Ohio EPA) under Ohio Revised
Code (ORC) §§ 3734.02(G), 3734.13, 3734.14 and 3745.01 and Ohio Administrative Code
(OAC) rule 3745-50-31.

II. PARTIES BOUND

These Orders shall apply to and be binding upon the Respondent and successors
in interest liable under Ohio law. No change in ownership of the Respondent, or of the
facility, shall in any way alter Respondent’s obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same
meaning as defined in ORC Chapter 3734. and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA has determined the following findings:

1. Pursuant to ORC § 3734.02(G) and OAC rule 3745-50-31, the Director, by
   order, may exempt any person generating, storing, treating, disposing of, or
transporting hazardous waste, in such quantities or under such circumstances that, in the determination of the Director, are unlikely to adversely affect the public health or safety or the environment from any requirement to obtain a permit or comply with other requirements of ORC Chapter 3734. Such an exemption shall be consistent with and equivalent to rules promulgated under the Resource Conservation and Recovery Act of 1976, 90 Stat. 2806, 42 U.S.C. § 6921 et seq., as amended.

2. ORC § 3734.02(E)(2) requires all persons engaged in the storage, treatment, or disposal of any hazardous waste to have a hazardous waste installation and operation permit issued in accordance with ORC § 3734.05 and the rules adopted thereunder, including, but not limited to, the requirements to submit Part A and Part B permit applications at least 180 days before physical construction has commenced, as required by OAC rule 3745-50-40(A), except at a facility that is not subject to permit requirements under rules adopted by the Director pursuant to ORC § 3734.02(E)(3)(b).

3. In a memorandum issued by U.S. EPA and dated June 23, 2017, titled “Recalled Takata Airbag Inflators” (Memorandum), U.S. EPA concluded that recalled Takata airbag inflators were not subject to the Resource Conservation and Recovery Act (RCRA) requirements while being held under the 2015 U.S. Department of Transportation Preservation Order (2015 Preservation Order). However, U.S. EPA determined once no longer subject to the Preservation Order and other legal action related to the recall, the airbag inflators would be considered solid waste and subject to a hazardous waste determination and any applicable RCRA regulations, including the requirement to obtain a hazardous waste permit for storage and treatment. Also, even airbag inflators subject to the Preservation Order that were not managed and stored in a manner that prevents release may be considered a solid waste and a hazardous waste.

Therefore, U.S. EPA determined un-deployed airbags, if used and discarded, as defined under OAC rule 3745-51-02(A)(2), are solid waste (or “waste” in the State of Ohio as defined under OAC rule 3745-51-02(A)(1)) are hazardous waste because they generally exhibit the ignitability (D001) and reactivity (D003) hazardous waste characteristics, as defined under OAC rules 3745-51-21 and 3745-51-23, respectively. Takata airbags are “used” because they were, are, and will be removed from a vehicle. Once no longer subject to the 2015 Preservation Order, Takata airbags are then considered “discarded” and, therefore, a “spent material” as defined under OAC rule 3745-51-01(C)(1).

The Memorandum can be read to mean any used, discarded and un-deployed airbags are solid waste and hazardous waste (airbags that use compressed gas would need to be properly evaluated in accordance with
OAC rule 3745-52-11). Un-deployed airbags that were never installed in a vehicle, such as those sold at retail, are not "used" and, thus, not subject to the Memorandum.

Finally, in the Memorandum, U.S. EPA states that determinations on recycling and treatment are site- and case-specific and it recommends entities work with the states and U.S. EPA to make determinations on exemptions and exclusions.

On July 19, 2018, U.S. EPA issued an additional interpretative policy regarding titled "Regulatory Status of Automotive Airbag Inflators and Fully Assembled Modules." U.S. EPA further clarified how airbag inflators and airbag modules were regulated pursuant to RCRA.

Finally, on November 30, 2018 U.S. EPA issued an interim final rule regarding the management of airbag waste. This rule allowed flexibility in the management of airbag waste through a conditional exemption from the hazardous waste program.

4. In light of Finding No. 3. of these Orders, Respondent and Ohio EPA have had discussions about Respondent's desire to store and recycle discarded, un-deployed airbags at Respondent's Facility without the need of a hazardous waste permit for storage prior to recycling as well as treatment of the airbags during the recycling process while Respondent pursues an Ohio hazardous waste permit. During these discussions, Respondent explained Respondent would receive assembled airbag modules and would disassemble onsite to remove the inflator devices. The inflator devices are regulated by Bureau of Alcohol, Tobacco and Firearms (BATF), which Respondent has been issued an BATF permit (permit number 4-OH-051-34-2F-01199) for the storage and management of inflators. The storage of inflators will meet the following standards, pursuant to the BATF permit: in a fire-resistant, weather-resistant, and theft-resistant magazine, exposed metal components are painted to avoid sparking; use of non-sparking materials and tools; employee training and background checks. The assembled airbag modules are not regulated by BATF. At the effective date of these Orders, Respondent will store no more than 1,000,000 pounds of assembled airbag modules for the first 180 days after the effective date of these Orders which will be stored inside the building. 180 days after the effective date of these Orders, Respondent will only store up to 160,000 pounds of assembled airbags inside the building and up to 120,000 pounds of air bag inflators inside four (4) magazines within the building. Respondent explained that the recycling process would entail removing the inflator from the assembled airbag module and placing the inflator devices on a conveyor that feeds into an Electronic Airbag Deactivation System (EAD) which is heated to 600 degrees Celsius. The temperature causes a chain reaction
that will deactivate the ammonium nitrate which renders the units non-hazardous (the ignitability and reactivity hazardous waste characteristics are deactivated). The recovered metal from the EAD would be cooled in a quench bath then packaged for off-site shipment to a metal reclamation facility. The plastic and other material from the airbag modules (e.g., nylon bag) would also be sent off-site for recycling. The EAD is located inside an isolated room away from all employees. Respondent will train all employees who handle inflators and airbag modules on safe handling of these devices and will continue to update and provide training on proper safety procedures. Furthermore, Respondent intends to conduct daily operation inspections and monthly maintenance and operation inspections of the system to ensure the system is working properly and all safety measures are in place. Respondent explained that by following these procedures all airbag modules and inflators can be effectively and safely recycled.

5. Respondent provided Ohio EPA information which demonstrates the EAD is a legitimate metal recovery device pursuant to OAC rule 3745-266-100(D).

6. Ohio EPA has had discussions with U.S. EPA about the Memorandums described in Finding No. 3. of these Orders and Ohio EPA’s desire to continue to facilitate the recycling of airbag waste to recover metal and other materials. Ohio EPA and Respondent have worked together to use this Order to provide a bridge to Respondent’s Ohio hazardous waste permit to allow Respondent to begin recycling operations of airbag waste.

7. On June 11, 2019, Respondent submitted an application (2019 Application) to Ohio EPA pursuant to ORC § 3734.02(G) and OAC rule 3745-50-31 for an exemption from ORC § 3734.02(E)(2). The 2019 Application is attached and incorporated herein. The 2019 Application included information justifying the request and documentation that the storage of airbags at the Facility without a hazardous waste installation and operation permit is unlikely to adversely affect public health or safety or the environment.

8. Pursuant to ORC § 3734.02(G) and OAC rule 3745-50-31, the Director has determined that Respondent’s management of airbags at the Facility described in the 2019 Application from the effective date of these Orders is unlikely to adversely affect public health and safety or the environment so long as it is managed in accordance with these Orders, the 2019 Application, and the BATF permit. Furthermore, issuance of these Orders is consistent with the conditions set forth in ORC § 3734.14 which encourages the recovery of resources from hazardous waste.
V. ORDERS

1. Respondent is hereby exempted from the requirement to obtain a hazardous waste installation and operation permit issued in accordance with ORC § 3734.05, as required by ORC § 3734.02(E)(2), and the rules adopted thereunder, including, but not limited to, the requirements to submit Part A and Part B permit applications at least 180 days before physical construction has commenced, as required by OAC rule 3745-50-40(A), provided Respondent complies with the 2019 Application and the conditions herein and Respondent’s BATF permit which is incorporated into these Orders as if fully written herein. The exemption applies to all discarded, un-deployed airbags at the Facility stored prior to the electronic deactivation (recycling/and or treatment) of the airbags.

2. Respondent may not exceed the following storage capacity at the Facility, except for assembled airbag modules as described in Order No. 3.:
   a. Maximum of 160,000 pounds of assembled airbag modules in the building; and
   b. Maximum of 120,000 pounds of inflators (BATF regulated) in BATF magazines.

3. As described in Finding No. 4. of these Orders, Respondent may store up to 1,000,000 pounds of assembled airbag modules at the Facility for 180 days after the effective date of these Orders to facilitate the initial processing of received assembled airbag modules. After 180 days, Respondent shall comply with the storage limitations set forth in Order No. 2. During this six-month period, Respondent shall submit a progress report on the 15th of each calendar month which describes the amount of airbag modules processed for the previous month and the current inventory of assembled airbag modules. These reports shall be submitted pursuant to Section X. Notice, of these Orders.

4. Within 90 days of the effective date of these Orders, Respondent shall submit a Part A permit application.

5. Within 180 days of Ohio EPA receiving the Part A permit application, Respondent shall submit a Part B permit application, including the information required in OAC rule 3745-266-100(D).

6. Respondent shall submit a disclosure statement to the Ohio Attorney General as pursuant to ORC § 3734.42 and OAC chapter 109:6 at the same time Respondent submits Respondent’s Part A permit application described in Order No. 4.
7. Within 30 days of the effective date of these Orders, Respondent shall provide documentation demonstrating Respondent has established financial assurance and liability coverages for the areas of the Facility subject to closure, in accordance with OAC rules 3745-55-42 through 3745-55-47.

8. Respondent shall maintain a record of amount of recycled materials including plastics, fabric cushions, and metals from the disassembled airbag modules as well as metals generated from the inflators after electronic deactivation operation, as described in the 2019 Application, Automotive Airbag Recycling Flowchart. Respondent shall also maintain records and information on all destination facilities for recycled materials.

9. Prior to any employee deactivation of the inflators or air bag modules, Respondent shall maintain documentation at the Facility that all employees have been initially trained on the safety procedures found in Appendix J of the application. Respondent shall maintain documentation that each employee has been trained annually thereafter as described in Appendix J of the application.

10. Respondent shall properly characterize any waste generated from the electronic deactivation process in accordance with OAC rule 3745-52-11 and subsequent manage the waste in accordance with all applicable laws and rules.

11. The Director may revoke the exemption granted in Order No.1. for any reason including, but not limited to, a determination that Respondent’s activities at the Facility adversely affect public health or safety or the environment and/or the activities are not being conducted in accordance with these Orders and/or the 2019 Application.

12. The exemption provided by Order No.1 shall terminate when any of the following occurs:

   a. Respondent is issued a hazardous waste installation and operation permit;
   b. U.S. EPA revokes the Memorandum;
   c. The Director denies the issuance of an Ohio hazardous waste permit
   d. Respondent no longer holds a valid BATF permit; or
   e. The Director revokes the exemption granted under these Orders.

13. If any of Orders 12.c., or 12.d. or 12.e. occurs, Respondent shall within 14 days of the occurrence, cause the lawful off-site transportation of all un-deployed airbags to an authorized facility.
14. The issuance of these Orders by the Director does not release Respondent of any liability Respondent may have incurred for any violations which may have occurred at the Facility prior to the effective date of these Orders. The issuance of these Orders does not release Respondent from any obligation Respondent has to comply with the State of Ohio's environmental laws, or any variance, except as otherwise specifically provided herein.

15. These Orders do not exempt Respondent from any other local, state, or federal laws or regulations which are otherwise applicable.

VI. TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and Ohio acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of Respondent. For purposes of these Orders, a responsible official is a [e.g., corporate officer] who is in charge of a principal business function of the Respondent.

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to, the operation of Respondent's Facility.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.
IX. RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII. of these orders.

X. NOTICE

All documents required to be submitted by Respondent pursuant to these Orders shall be addressed to:

Ohio Environmental Protection Agency
Northwest District Office
Division of Environmental Response and Revitalization
347 N. Dunbridge Road
Bowling Green, Ohio 43402
Attn: Hazardous Waste Program Manager

and Ohio EPA Central Office at the following address:

For mailings, use the post office box number:

Manager, Hazardous Waste Compliance Assurance Section
Ohio Environmental Protection Agency
Lazarus Government Center
Division of Environmental Response and Revitalization
P.O. Box 1049
Columbus, Ohio 43216-1049

For deliveries to the building:

Manager, Hazardous Waste Compliance Assurance Section
Ohio Environmental Protection Agency
Lazarus Government Center
Division of Environmental Response and Revitalization
50 West Town Street
Columbus, Ohio 43215

or to such persons and addresses as may hereafter be otherwise specified in writing by Ohio EPA.

XI. MODIFICATIONS

These Orders, including the application, may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be processed by the
administrative requirements found in OAC rule 3745-50-51. The effective date of the modifications shall be the date approved by Ohio EPA.

XII. WAIVER

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated, or modified.

XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's Journal.

XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS ORDERED AND AGREED:

Ohio Environmental Protection Agency

[Signature]
Laurie A. Stevenson
Director
USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling Inc.
DIRECTOR'S FINAL FINDINGS AND ORDERS
PAGE -10-

IT IS SO AGREED:

USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling Inc.

[Signature] 9.25.2019

[Printed or Typed Name]

[Title]
Ohio Environmental Protection Agency  
Director's Office  
Ms. Laurie A Stevenson, Director  
50 W Town Street  
Columbus, OH 43215

June 11, 2019

Dear Ms. Stevenson,

USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc. is requesting that the Ohio Environmental Protection Agency (Ohio EPA) grant an exemption from hazardous waste permitting (OAC 3745-50) for the storage and treatment of automotive air bags at our facility located at:

715 West Linfoot Street  
Wauseon, Ohio 43567

For the purpose of this exemption request, automotive airbags that have been rejected by automobile manufacturers are considered Hazardous Waste. These automotive airbags are considered “spent materials” and subject to be a solid waste (waste in the State of Ohio), and furthermore would exhibit the characteristic of ignitability (D001), reactivity (D003).

The term “automotive airbags” includes all the following automotive safety device units and terms:

- Air Bag (driver and passenger side);
- Side curtain airbags;
- Seat belt pretensioners;
- Inflators (ATF regulated); and
- Modules (complete assembled units).

The current position of the OH EPA is that automotive airbags that have never been installed in a vehicle would be considered a “Commercial Chemical Product” and if recycled, would not be a hazardous waste.

Automotive airbags that have been installed in a vehicle and then removed, would be a “spent material” and therefore a hazardous waste due to the characteristic of ignitability and reactivity (D001 & D003). This interpretation stems from the US EPA’s November 30, 2018 Interim Final Rule: Safe Management of Recalled Airbags revisions to 40 CFR 260.10, CFR 261.4 and CFR 262.14.
Automotive Airbag Recycling Exemption Request

For the purpose of this exemption request, Cleanlites Recycling, Inc will be managing automotive airbags that may be deemed Hazardous by the Ohio EPA at their facility located in Wauseon, Ohio. Cleanlites Recycling, Inc will be accepting Non-Hazardous airbags that have not been installed in a vehicle along with automotive airbags that may have been installed and found faulty and/or may be deemed hazardous by the Ohio EPA.

Part of the process at Cleanlites Recycling, Inc is regulated by the Federal Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF). The ATF does not regulate whole automotive airbag assemblies (modules), only inflators that are not assembled within the complete automotive airbag assembly. The ATF may deem other airbags and components as hazardous that have been installed in vehicles and have been found defective and cannot be reused. Cleanlites Recycling, Inc will be utilizing an Electronic Airbag Deactivation System for the deactivation of inflators. The process that Cleanlites Recycling, Inc will be using will be completed in a controlled environment away from personnel, creating the safest possible method to manage these units.

Complete Automotive Airbag Assembly (Modules) (Not Regulated by ATF)  Inflators only (ATF Regulated)

Cleanlites Recycling, Inc respectfully requests that we be allowed to store approximately 1 million pounds of assembled automotive airbags for six months (180 days) after the effective date of the OH EPA Final Orders in order to facilitate the initial processing of received assembled automotive airbags.

Cleanlites Recycling, Inc will submit a Part A application within 90 days of receipt of this exemption.

For questions about the operations or information contained in this application, please contact the following:

- Mike Kimmel, Sr VP 517.676.0044 | mikek@cleanlites.com
- Benny Coyt, EHS Manager 513.851.3500 | benny.coyt@cleanlites.com
- Tim Kimmel, VP 513.851.3500 | timothy.kimmel@cleanlites.com
Automotive Airbag Recycling Exemption Request

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

Respectfully,

[Signature]

Thomas M Kimmel
President / CEO
USA Lamp & Ballast Recycling, Inc
dba Cleanlites Recycling, Inc.
Automotive Airbag Recycling Exemption Request

Compliance with Storage and Treatment requirements:

Scope:

The content below describes the relevant TSDF rules that will apply to the operations at Cleanlites Recycling, Inc and shall be included in the Director’s Findings and Orders that describe the exemption from the requirement to obtain a permit for storage and treatment of automotive airbags (Hazardous Waste).

Content and Activities (OAC 3745-50-43 & 3745-50-44):

Cleanlites Recycling, Inc will be using an Electronic Airbag Deactivation System to discharge the Inflators at the Wauseon, Ohio location. The materials will then be sent to an off-site metal recycler.

Enclosed in this request you will find the following additional information:

- Appendix A: Summary of how Cleanlites Recycling, Inc will comply with our Federal ATF permit and associated requirements;
- Appendix B: Management of air bags in a safe and effective manner to prevent any adverse effects to human health and the environment.
- Appendix C: Copy of Cleanlites Recycling, Inc’s Liability Insurance.
- Appendix D: Cleanlites Recycling, Inc Site Drawings
- Appendix E: Waste Analysis Plan.
- Appendix G: Cleanlites Recycling, Inc Closure Plan.
- Appendix H: Post Closure Plan
- Appendix I: Daily operation inspection log.
- Appendix J: Automotive Airbag Device Recycling Procedures – covers safety elements & PPE
- Appendix K: ATF Permit 4-OH-051-34-2F-01199
- Appendix L: Electronic Airbag Deactivation System Drawing

Cleanlites Recycling, Inc will install an Electronic Airbag Deactivation System at the Wauseon, Ohio location. The system will contain a water quench to cool the metals after the Electronic Airbag Deactivation System has deactivated the inflators. The water quench will not produce any waste.
Automotive Airbag Recycling Exemption Request

Automotive Airbag Recycling Flowchart

RECEIVING
Automotive Airbags received for recycling at Cleanlites Recycling, Inc on signed, numbered, dated BOL/Manifest

SORTING
Trained personnel evaluate the Automotive Airbags to ensure proper materials received and BOL/Manifest completed correctly

DISASSEMBLY OF APPROVED AUTOMOTIVE AIRBAG MATERIALS

PROCESSING

INFLATORS

OTHER PERIPHERALS

ELECTRONIC AIRBAG DEACTIVATION SYSTEM (ADS)

Inflators placed on conveyor belt to enter the ADS

Inflators placed in ADS deactivating inflators

After deactivation, inflators placed in water chamber for cooling

Off gasses captured with air filtration system and released

Plastics sent to downstream vendor for recycling

Fabric cushions sent to downstream vendor for recycling

Metals sent to downstream vendor for recycling

Cooled, deactivated inflators sent downstream to metal vendor and recycled

Confirm that Automotive Airbags received are correct and match BOL/manifest

YES

NO
Return to Sender. Note discrepancy on manifest
Automotive Airbag Recycling Exemption Request

Owner/Operator names(s):

OPERATOR
USA Lamp & Ballast Recycling, Inc.
dba Cleanlites Recycling Inc.
715 West Linfoot Street
Wauseon, OH 43567

LEGAL OWNER
D & K Asset Management, LLC
665 Hull Road, PO Box 212
Mason, MI 48854

USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc is a privately-held corporation

Address of the Cleanlites Recycling, Inc facility that will process the Automotive Airbags:
715 West Linfoot Street
Wauseon, OH 43567

Latitude: 41° 33’ 30.636” N
Longitude: 84° 9’ 19.62” W

Telephone Number: 517.676.0044

Owner of USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc: Thomas M Kimmel

Cleanlites Recycling, Inc Responsible Officials:
President/CEO: Thomas M Kimmel
Senior Vice President: Michael T Kimmel
Vice President: Timothy M Kimmel

EPA Identification Number: OHR 000 108 050

NAICS Code: 562920 Materials Recovery Facility

Site Maps: See Appendix D
Aerial Map
Facility Map with Emergency Exits
Alta Map
Topography Map

List of Current Permits:

1. Federal ATF- Federal Explosives License / Permit 4-OH-051-34-2F-01199
2. Transporter of Hazardous Waste and DOT Hazardous Materials:
   a. US DOT Census #: 608943
   b. EPA Transporter ID #: MIR 000 016 402
   c. Uniform Hazmat Transportation Program ID #: UPW-0608943-MI
   d. Hazardous Materials Certificate of Registration: 062718550713AC
3. Ohio EPA Stormwater “No Exposure” certification: 2GRN00636*AG
4. EPA identification No: OHR 000 108 050
Automotive Airbag Recycling Exemption Request

Hazardous Waste to be processed for recycling:

Automotive airbags that may be deemed hazardous materials by the Ohio EPA, which may include but are not limited to, recalled automotive airbags that cannot be safely deployed electronically.

Based on the US EPA memorandum, this would include automotive airbags that were installed in vehicles and then removed. US EPA considers these units to be “used” (i.e., spent materials). These “used” automotive airbags would then exhibit the following characteristics of Hazardous Waste:

D001- Ignitable
D003- Reactive

For the purpose of this exemption request, Cleanlites Recycling, Inc will manage all automotive airbags received at the Wauseon Ohio location that have been removed from vehicles or automotive airbags that the Ohio EPA has found to be unsafe to be deployed electronically as Hazardous.

The hazard associated with the automotive airbags is the ammonium nitrate that is used in the inflator to cause the deployment of an automotive airbag in a vehicle in the event of an accident. Once the units are deployed, or the ammonium nitrate is negated, the automotive airbags do not present any other environmental hazards.

As stated above, these automotive airbags will be processed in an Electronic Airbag Deactivation System that includes a water quench for cooling the inflators after the deactivation process. The inflators will be loaded onto a conveyor belt inside an isolated room. The Electronic Airbag Deactivation System will slowly heat the inflators up to a temperature of 600 C. The temperature will cause a chain reaction and cause the inflators to deactivate. This method is completed in a controlled environment away from personnel, creating the safest possible method to manage these units. The Electronic Airbag Deactivation System is designed to ensure that no automotive airbag can exit the processing procedure without being deactivated.

The main purpose of this process at Cleanlites Recycling, Inc is to remove the hazard from the automotive airbags and then recycle the metals from the inflators.

Normal Processing Quantities:

Daily average: 15,000 pounds per day
Daily maximum: 36,000 pounds per day

Storage Quantities:

Maximum on-site storage of Automotive Airbags (Whole units): 160,000 pounds
Maximum on-site storage of inflators (ATF regulated): four (4) magazines (120,000 pounds)

Waste Analysis Plan (OAC 3745-54-13)- see Appendix E
Automotive Airbag Recycling Exemption Request

Security (OAC 3745-54-14):

Cleanlites Recycling, Inc has a security system in place. The system includes video cameras with motion sensors. The system covers all exits, entries, and other areas where materials and employees will be working.

The facility is locked, and the alarm is set every day after the work shift, when managers and supervisors leave the facility.

Only the supervisors and managers of the facility have the access code for the alarm system. The company that monitors the security system has a Cleanlites Recycling, Inc call list. If the security company does not reach a Cleanlites Recycling, Inc employee, the police are called immediately.

Access control:

During daytime business hours, all doors that are used to gain entry into the facility will be locked, except the lobby door. The lobby door will be unlocked to receive customers. All visitors must sign-in on the visitor log. The visitors must read the visitors information and understand the rules and policy.

Cleanlites Recycling, Inc will only operate a first shift 8:00 A.M. to 4:00 P.M. During non-working hours the security system will be fully operational.

Truck Traffic:

All trucks entering the site will be required to check in at the main office before entry into the Cleanlites Recycling, Inc facility. All trucks that are loaded or unloaded must be checked by a Cleanlites employee. All drivers must check into the shipping and receiving area. Non-Cleanlites employees will not be allowed to walk around the facility without a Cleanlites employee escort.

Visitors and Contractors:

All visitors and contractors to Cleanlites Recycling, Inc will be accompanied by a Cleanlites Recycling, Inc employee at-all-times. The only exception to this is for the contractors that have been pre-approved and have been trained on the safety requirements, they will be issued a “contractor's ID.” All visitors, being accompanied by a Cleanlites Recycling, Inc employee, will be given a “visitors ID.”

Employees:

All Cleanlites Recycling, Inc employees go through pre-employment screening, which includes a background check and a pre-employment drug screen. All Cleanlites Recycling, Inc employees will receive an employee ID that must be worn at all times while working.
Automotive Airbag Recycling Exemption Request

Inspections (OAC 3745-54-15):

Daily Operations Check:

Cleanlites Recycling, Inc staff will conduct and document a daily operation inspection to ensure the Electronic Airbag Deactivation System process is operating properly, all safety measures are in place and working properly, and there is no risk of environmental contamination. The inspection will include the following:

- Safety issues:
  - Proper grounding of all equipment (if required).
  - Safety mechanisms in place and properly working on Electronic Airbag Deactivation System.
  - Ancillary equipment guards are in place and structurally sound.
- PPE and spill response equipment available and in place.
- Emergency response communication methods available and in good working order.
- Automotive airbag storage. Ensure there are no unusual circumstances such as severely damaged packaging or other indicators representing a potential safety or environmental issue.
- Fire extinguishers – checked visually daily. Monthly inspections will be documented per OSHA requirements.
- Ensure that no open flames or sparking equipment is within 25 feet of any automotive airbag storage.
- Ensure that the security system, including cameras is working properly.
- Condition of scrap containers.
- Outside conditions for any exposure or unusual conditions, if materials are stored outside.
- Maintain aisle space to allow the free movement of emergency response equipment around the outside of the automotive airbag storage areas.

This daily operational inspection will be documented on a daily inspection form.

Monthly Maintenance Check:

At a minimum each month, Cleanlites Recycling, Inc will conduct an inspection of the overall maintenance and operation of the Electronic Airbag Deactivation System process. The inspection will include:

- Overall integrity of the Electronic Airbag Deactivation System and associated equipment.
- Electrical supply to the Electronic Airbag Deactivation System to ensure integrity.
- Machine safety guarding.
- Integrity of the water quench.

Cleanlites Recycling, Inc will also implement a documented preventive maintenance plan and schedule for the Electronic Airbag Deactivation System and associated equipment. This will be identified on a planned preventive maintenance schedule by Cleanlites Recycling, Inc’s management.
Automotive Airbag Recycling Exemption Request

Quarterly Compliance and Management System Audits:

Cleanlites Recycling, Inc maintains an annual compliance calendar for all operations, including environmental and ATF regulatory requirements. The calendar details all tasks necessary to maintain compliance and continuous improvement. The calendar defines each task, the responsible employee(s), and due date for each task. The Cleanlites Recycling, Inc management team will monitor these tasks and due dates. Cleanlites Recycling, Inc will audit the Wauseon Ohio location annually.

Visual checks:

After inflators are ready to enter the Electronic Airbag Deactivation System, Cleanlites Recycling, Inc employees will visually check materials to ensure only inflators are entering the Electronic Airbag Deactivation System.

The Electronic Airbag Deactivation System and all associated equipment will be properly grounded. Cleanlites Recycling, Inc will ensure no high voltage power sources or ignition sources are within 25 feet of area where inflators are being processed.

Cleanlites Recycling, Inc has a fire suppression sprinkler system throughout the facility.

Ignitable/Reactive Waste Management (OAC 3745-54-17):

Cleanlites Recycling, Inc established the Electronic Airbag Deactivation System in a manner to prevent any adverse effects from ignitable/reactive waste and to prevent accidental ignition or reaction. The Electronic Airbag Deactivation System process with the water quench was specifically chosen to manage the automotive airbags safely due to them being ignitable or reactive.

The Electronic Airbag Deactivation System is located in an isolated room that protects all personnel. No employees will be located within the room during the process. No automotive airbags, to be processed, will be located within 25 feet of the Electronic Airbag Deactivation System area.

A fire suppression sprinkler system is located throughout the Cleanlites Recycling, Inc facility.

Personnel Training (OAC 3745-54-16):

All Cleanlites Recycling, Inc employees involved in the automotive airbag processing will be trained on the following prior to performing any function associated with automotive air bags:

- Safety Procedures associated with the automotive airbag processing.
- Inspection requirements.
- All work process training
- Contingency Plan which includes emergency response methods.
- Applicable requirements in this application including pollution prevention.
Automotive Airbag Recycling Exemption Request

The Contingency Plan training will include the following:

Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.

- Communications and alarm systems.
- Response to fire and explosions.
- Response to groundwater contamination incidents.
- Shutdown of operations.

All employees including team leaders, forklift operators, supervisors and managers will receive the following training yearly:

- Safety Procedures
- Inspection Requirements
- Emergency Response Training (HAZWOPER)
- Job Specific Training
- DOT Training
- All Waste Training

All employees will receive required training before starting their position (DOT training within 90 days).

Cleanlites Recycling, Inc will maintain training records for 3 years. All training will include the title of the training, employees that received training, and the instructor who taught the training.

Location of the facility (OAC 37-50-44):

715 West Linfoot Street
Wauseon, OH 43567

Latitude: 41° 33' 30.636" N
Longitude: 84° 9' 19.62" W

The site elevation is 769 feet above sea level

The site is located less than a mile from the nearest waterway

Based on the elevation of the facility grounds and the FEMA Flood Map Service Center Maps for the City of Wauseon, Ohio area, the Cleanlites Recycling, Inc location is not within a 100-year flood plain.
Automotive Airbag Recycling Exemption Request

See the FEMA map below for the city of Wauseon, Ohio. Please note that 715 West Linfoot Street, Wauseon, OH is in the “area of minimal Flood Hazard”.

FEMA – Wauseon, Ohio Flood Map:

Hazardous Waste Preparedness, Prevention and Contingency Plan (OAC 37-54-51):

Clealites Recycling, Inc has developed and implemented a contingency plan for the facility. The contingency plan is intended to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

Based on the design of the equipment and the nature of the automotive air bags (sold part), a release is unlikely. Clealites Recycling, Inc has carefully chosen the Electronic Airbag Deactivation System process to ensure the deactivation process is kept away from all employees and inside an isolator room.
Automotive Airbag Recycling Exemption Request

3745-55-73 Management of containers.

The automotive airbags will arrive at Cleanlites Recycling, Inc on a semi-truck trailer or box truck in boxes on pallets, in containers, or in DOT performance-oriented packing/containers. A Cleanlites Recycling, Inc employee will data-record the units upon arrival. The automotive airbags are then staged and sent on for the processing of the automotive airbags. The processing involves unpacking the units and removing the plastics, fabric cushions, metals and inflator from the automotive airbag unit. The plastics, fabric cushions and remaining metals recovered from the automotive airbag unit are shipped to the appropriate downstream vendors for recycling. The inflators are brought to the Electronic Airbag Deactivation System for processing.

The inflators are taken to the room that houses the Electronic Airbag Deactivation System. The inflators are placed on a conveyor for entry into the Electronic Airbag Deactivation System. When the inflators process through the Electronic Airbag Deactivation System at a temperature of 600 degrees Celsius and reach the correct temperature, it will initiate a chain reaction and cause the inflators to deactivate.

After the inflators are processed in the Electronic Airbag Deactivation System and deactivated they will continue through a water quench for cooling. When the inflators are cooled they will be dumped into a large roll-off container and sent to a downstream recycler for scrap metals.

Recordkeeping (OAC 3745-54-70 through 3745-54-77)

OAC-3745-54-71 Use of the manifest system:

Manifests will be managed through the Cleanlites Recycling, Inc Records Management Procedure. This includes the following:

- When Cleanlites Recycling, Inc receives a manifested shipment of automotive airbags, Cleanlites Recycling, Inc personnel will sign and date each copy of the manifest and note any discrepancies.
- Provide the transporter a copy of the manifest.
- Within 30-days submit a copy of the manifest to the generator.
- Retain a copy of the manifest in Cleanlites Recycling, Inc files for at least 3 years.
Automotive Airbag Recycling Exemption Request

OAC-3745-54-76

Unmanifested waste report or rejection of a shipment:

If Cleanlites Recycling, Inc receives a shipment of automotive airbags that should be manifested (used air bags/ inflators) as a hazardous waste without an accompanying hazardous waste manifest, a report in accordance with this rule will be submitted to Ohio EPA within 15-days after receiving the automotive air bags.

If Cleanlites Recycling, Inc receives a shipment of automotive airbags and the shipment has other hazardous waste on-board that are not automotive airbags, Cleanlites Recycling, Inc will reject the shipment and notify the shipper immediately.

The on-site supervisor will be responsible for the management of the manifests. The back-up will be the Facility Manager.

Inspection records:

- The daily operational inspections will be documented and kept for a period of at least 3-years.
- All Hazardous Waste Manifests will be kept for a period of at least 3-years.
- All quarterly compliance and environmental management system audits will be kept for a period of 3-years.
- All monthly maintenance inspections and preventative maintenance will be documented and kept for a period of at least 3-years.

Training Records:

Training records will be maintained for all employees involved in the automotive airbag processing for at least 3-years. The records will include:

- Job description/title
- Required training
- Outline of the training
- Evidence of training completion.
Automotive Airbag Recycling Exemption Request

OAC-54-73  Operating Record.

Cleanlites Recycling, Inc will keep the following records as part of its operating record:

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<td>The amount of total automotive airbags received at the site each day in pounds</td>
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<td>The quantity of automotive airbags processed each day</td>
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<td>A breakdown of the quantity of automotive airbags received from each generator by date, the transporter used and the waste codes</td>
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<td>Summary of any emergency incidents that require implementation of the contingency plan</td>
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<td>Any corrective actions implemented as a result of implementation of the contingency plan</td>
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<td>Closure plan including cost estimates and updates</td>
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<td>Employee Training Records</td>
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<tr>
<td>If required, monthly report to Ohio EPA of inventory of airbags</td>
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OAC 37-45-54-75  Biennial report

Cleanlites Recycling, Inc will submit a report by March 1st of every even numbered year. The report will cover Cleanlites Recycling, Inc activities for the automotive airbag during the previous calendar year. The information in the report will be as required by the rule.

OAC 3745-54-77  Additional reports

Cleanlites Recycling, Inc will report any of the following to Ohio EPA within 3 business days:

- Releases, fires, or explosions involving the processing of automotive air bags; and
- Closure of the facility.
Automotive Airbag Recycling Exemption Request

APPENDIX A

Compliance with Federal ATF permit and associated requirements

License/Permit Number: 4-OH-051-34-2F-01199

*ATF only regulates inflators. ATF does not regulate complete assembled automotive airbags (modules).

Cleanlites Recycling, Inc will meet all the requirements of our ATF permit and 27 CFR Part 55. This includes the following requirements for Type 4 Magazines (low explosives) and test results:

- Cleanlites Recycling, Inc uses inside storage magazines which are storage containers. The storage magazine is fire-resistant, weather-resistant, and theft-resistant. The inside storage will be in the building with a sprinkler system in place.
- The select location of the storage magazine on-site meets the ATF requirements in 27 CFR Part 55.
- The storage magazine is locked with a locking mechanism that complies with the 27 CFR Part 55.
- The doors and hinges on the storage magazine are designed in a manner to comply with the ATF requirements in 27 CFR Part 55.
- Exposed metal components inside storage magazine are painted with non-sparking paint to comply with the ATF requirements in 27 CFR Part 55.
- Cleanlites Recycling, Inc will use non-sparking materials and tools.
- Cleanlites Recycling, Inc has trained all employees on proper storage and security requirements associated with the ATF requirements in 27 CFR Part 55.
- All Cleanlites Recycling, Inc employees involved in the management of the inflators went through a security background check by the ATF. All future employees handling inflators will fill out Employee Processor Questionnaire ATF E-Form 5400.28
- Cleanlites Recycling, Inc will fill-out Daily Summary of Magazine Transactions (DSMT) to maintain accurate record keeping as inflators enter and exit the storage magazine as required by ATF Publication 5400.18

Cleanlites Recycling, Inc currently has safety procedures created and already in place for employees involved in the automotive airbag program. Once the operation is fully implemented, Cleanlites Recycling, Inc will complete the required training of safety and procedures for all employees involved in the management of inflators. The procedure will include all environmental, ATF, health and safety requirements, and best management practices.

Cleanlites Recycling, Inc maintains annual compliance calendar for all environmental and ATF regulatory requirements and best management practices. This calendar details all tasks necessary to maintain compliance and continuous improvement. The calendar defines each task, the responsible employee(s), and due dates for each task. Cleanlites Recycling, Inc’s management team monitors these tasks and due dates each month. In addition, Cleanlites Recycling, Inc conducts an audit bi-annually to ensure proper training and process.
Automotive Airbag Recycling Exemption Request

Appendix B

How Cleanlites Recycling, Inc manages the automotive airbag to protect human health and the environment

Cleanlites Recycling, Inc has invested significant time and expense into choosing the best option for the handling and processing of the automotive airbags (modules). After reviewing several options, Cleanlites Recycling, Inc chose the Electronic Airbag Deactivation System process. The Electronic Airbag Deactivation System is inside an isolated room and no employees are in the room while processing the automotive airbags. The Electronic Airbag Deactivation System process is the safest way to process these inflators without any personnel present.

The predominant hazardous/explosive ingredient in the airbag is ammonium nitrate. With the Electronic Airbag Deactivation System process, inflators are placed inside the Electronic Airbag Deactivation System. The temperature is raised to 600 degrees C, causing a chain reaction. The chain reaction is very close to the same way the inflators are deployed with an electrical charge in a vehicle. When the inflators come out of the Electronic Airbag Deactivation System, they will be circulated through a water quench to cool the metals. After the process is completed in the Electronic Airbag Deactivation System, all the inflators will be deactivated, and nothing will remain but scrap metals.

The entire Electronic Airbag Deactivation System process will be contained within the building at 715 West Linfoot St in Wauseon, Ohio 43567. There will be no exposure to the environment.

Cleanlites Recycling, Inc has designed the Electronic Airbag Deactivation System process to be very efficient. After the Electronic Airbag Deactivation System process is running full-time the processing of the automotive airbags should flow in accordance with a schedule. If for some reason the process flow has deviated, the automotive airbags will be fully secured according the ATF requirements 27 CFR Part 55. All employees that handle the automotive airbags have been fully trained on safely handling the automotive airbags. During the setup, Cleanlites Recycling, Inc will be conducting Job Hazard Analysis to determine engineering controls, proper safety procedures and proper safety equipment needed. Job Safety Analysis, noise monitoring, PPE assessments, and proper lifting will be assessed.

Cleanlites Recycling, Inc will conduct training on all safety, environmental, and AFT requirements throughout the process. The training will be put on a schedule to ensure that all proper training is kept up to date. Training in proper handling, PPE, equipment shut down, including Lock Out Tag Out emergency procedures as well as all required training set forth by OSHA and the EPA.

The automotive airbags processing will be conducted in the designated area and all proper equipment as well as safety devices will be kept in the proper locations. All processing of the inflators will be conducted in the Electronic Airbag Deactivation System in a room away from all employees. The process that is performed inside the building will have no impact on the community. All visitors to Cleanlites Recycling, Inc will have to go through a safety review and must be escorted by an approved Cleanlites Recycling, Inc employee.
Automotive Airbag Recycling Exemption Request

As stated above, Cleanlites Recycling, Inc maintains an annual compliance calendar for all environmental, ATF, and best management practices. Cleanlites Recycling, Inc will also maintain a compliance calendar for all health and safety requirements. These calendars detail all tasks necessary to maintain compliance and continuous improvements. The calendars define each task, the responsible employee(s), and due date for each task. Cleanlites Recycling, Inc ensures that all audits are completed within the time frame named.
**Certificate of Liability Insurance**

**Producers:**
- Hylant Group Inc - Toledo
- USA Lamp & Ballast Recycling dba Cleanciles
- Recycling Inc, LampMaster Recycling Services, Inc

**Insured:**
- USA Lamp & Ballast Recycling dba Cleanciles
- Recycling Inc, LampMaster Recycling Services, Inc

**Coverages: Certificate Number:** 1115017567

**Revisions:**

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**Certificate Holder: forge informational purposes**

**Cancellation: should any of the above described policies be cancelled before the expiration date therefor, notice will be delivered in accordance with the policy provisions.**
Automotive Airbag Recycling Exemption Request

Appendix D

SITE MAPS

USA Lamp & Ballast Recycling, Inc
dba Cleanlites Recycling, Inc
715 West Linfoot Street
Wauseon, Ohio 43567

May 31, 2019
Automotive Airbag Recycling Exemption Request
ATTACHMENT D

FACILITY MAP – Emergency Exits
Cleanlites Recycling, Inc.
715 W Linfoot Street
Wauseon, OH 43567
Automotive Airbag Recycling Exemption Request

Appendix E

WASTE ANALYSIS PLAN

USA Lamp & Ballast Recycling, Inc
dba Cleanlites Recycling, Inc
715 West Linfoot Street
Wauseon, Ohio 43567

May 31, 2019
Automotive Airbag Recycling Exemption Request
APPENDIX E – WASTE ANALYSIS PLAN

1) Background:

For the purpose of this exemption request, automotive airbags that have been rejected/recalled by automotive manufacturers are considered Hazardous Waste. These automotive airbags are considered “spent materials” and subject to be a solid waste (waste in the state of Ohio), and furthermore would exhibit the characteristic of ignitability (D001) and reactivity (D003).

The term “automotive airbags” includes all the following automotive safety device units and terms:

- Air Bags (driver and passenger side);
- Side curtain airbags;
- Seat belt pretensioners;
- Inflators (ATF regulated);
- Modules (complete assembled units)

The current position of the OH EPA is that automotive airbags that have never been installed in a vehicle would be considered a “Commercial Chemical Product” and if recycled, would not be a Hazardous Waste.

Automotive airbags that have been installed in a vehicle and then recovered, would be a “Spent Material” and therefore a Hazardous Waste due to the characteristic of ignitability and reactivity (D001 & D003). This interpretation stems from the US November 30, 2018 Interim Final Rule: Safe Management of Recalled Airbags revisions to 40 CFR 260.10, CFR 261.4 and CFR 262.14.

Cleanlites Recycling, Inc will be managing all automotive airbags as required by the US EPA once they arrive at the facility in Wauseon Ohio.

2) Waste Description

For the purpose of this plan, automotive airbags at Cleanlites Recycling, Inc include all the following automotive safety device units and terms:

- Air Bags (driver and passenger side);
- Side curtain airbags;
- Seat belt pretensioners;
- Inflators (ATF regulated);
- Modules (complete assembled units)

3) Waste Analysis Plan

Quench Water Analysis (if needed)
Bag House Analysis (dust)
Rejection Plan
Annual Review

Cleanlites Recycling, Inc
Wauseon, OH 43567
Page 2 of 4

May 31, 2019
Quench water

The water used in the quench bath will produce no waste. The deactivated inflators (now scrap metals) will be cooled in this water. After completion of the Electronic Airbag Deactivation System process no chemicals will remain on or in the materials. If it is found in the future that the quench water is becoming unsuitable, (PH changes, smelling), analysis will be taken for testing to ensure proper handling of this water. As it stands, the water will only need to be refilled due to evaporation.

Bag House

The dust that is collected from the Electronic Airbag Deactivation System process will be captured by the filtration system. The dust collected will be analyzed for the metal content of metals. If this dust content is found to be recyclable, it will be sold for recycling to an approved downstream vendor. If it is found to be not recyclable, it will be disposed of properly with a downstream vendor.

Particulate filters that are in place in the filtration system will be changed on an as needed basis. The spent filter(s) will be disposed of properly.

Rejection Plan

Cleanlites Recycling, Inc will check each shipment of automotive airbags that arrives at the facility. The Cleanlites Recycling, Inc employee will check the shipment papers or the Hazardous Waste manifest to ensure that it matches what is arriving on the transport vehicle. If there is a discrepancy, the employee will notify his/her supervisor immediately. The supervisor will contact the manager. The driver will be required to stay until the discrepancy is resolved and appropriate documentation is obtained and signed. If the issue cannot be corrected and it involves a discrepancy involving a different amount on the shipping paper versus what is on the transport vehicle, the shipping company will be contacted. If the shipping company cannot resolve the discrepancy, then Cleanlites Recycling, Inc will contact the local authorities.

If a shipment arrives at Cleanlites Recycling, Inc which contains hazardous waste other than automotive airbags, the Cleanlites Recycling employee will require the driver to stay on site and contact his/her supervisor immediately. The shipment will be rejected, and the shipper will be notified immediately.

Annual Review:

Cleanlites Recycling, Inc will evaluate all types of automotive airbags received at the facility to determine if any changes have occurred. Cleanlites Recycling, Inc staff will look at the types of automotive airbags received, and the component used to charge the inflator to determine if any changes would impact the process at Cleanlites Recycling, Inc.
4) **Cleanlites Recycling, Inc Procedure:**

Cleanlites Recycling, Inc will check each load/shipment of automotive airbags that arrive at the facility to ensure they are consistent with the shipping documents from the automotive company or 3rd party representative of the automotive company.

Cleanlites Recycling, Inc will visually check the following:
- Shipment is consistent with the supply papers
- There are no unusual circumstances with the packing
- There are no obvious signs of significant damage or stress with the packaging.

Cleanlites Recycling, Inc also has a procedure that describes how to handle the automotive airbags in a manner to protect human health. (please see Appendix J)

**Daily Operation Check:**

Cleanlites Recycling, Inc personnel will conduct and document a daily operation to ensure the Electronic Airbag Deactivation System processing equipment is operating properly and all safety measures are in place and working correctly. The inspection will include the following:

- Safety – Proper grounding of equipment, Electronic Airbag Deactivation System, and ancillary equipment guards, if required, are on, in place and structurally sound.
- PPE and spill response equipment available and in good working order.
- Emergency response communication methods available and in good working order.
- Automotive airbag storage - ensure there are no unusual circumstances such as severely damaged packaging or other indicators representing a potential safety or environmental issue.
- Fire Extinguishers - checked visually daily. Monthly inspections documented per OSHA requirements.
- Ensure no open flames or sparking equipment are within 25 feet of any automotive airbag storage.
- Ensure that the security system including cameras are working properly.
- Check all equipment for damage.
- Check outside conditions for any exposure or unusual conditions.
- Maintain aisle space to allow the free movement of emergency response equipment around the outside of the automotive air bag storage areas. This does not apply to the ATF storage containers. The ATF containers will comply with applicable ATF requirements.

The daily operational inspection will be documented on a daily inspection form.
Automotive Airbag Recycling Exemption Request

Appendix F

HAZARDOUS WASTE CONTINGENCY PLAN AND EMERGENCY PROCEDURES

USA LAMP & BALLAST RECYCLING, INC
dba Cleanlites Recycling Inc.

715 West Linfoot Street
Wauseon, Ohio 43567
517.676.0044 phone | 517.676.4449 fax
wauseon@cleanlites.com

May 31, 2019
FOREWORD

This document has been prepared in compliance with the following regulations.

FEDERAL

40 CFR 265 Sub-part C and 40 CFR 265 Sub-part D

STATE

Ohio Administrative Code 3745-54-50 through 3745-54-56 and 3745-65-50 through 3745-65-56.

These regulations are designed to minimize hazards to human health and the environment due to accidental release of hazardous materials to the air, soil, or surface waters.

This Contingency / Emergency Response Plan describes actions that facility personnel must take to comply with the above regulations in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous material/waste constituents to the air, soil, or surface waters.

USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc. (USA Lamp / Cleanlites) and all employees involved in handling such materials are required to carry out the proceedings and precautions included herein.

Thomas M Kimmel
President/CEO

Timothy M Kimmel
Vice President Sales & Marketing
# APPENDIX F

## Hazardous Waste Contingency Plan & Emergency Response Procedures

## TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Foreword</td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>Table of Contents</td>
<td></td>
<td>3</td>
</tr>
<tr>
<td>1.0</td>
<td>General Information</td>
<td>6</td>
</tr>
<tr>
<td>1.1</td>
<td>Facility name and Location</td>
<td>6</td>
</tr>
<tr>
<td>1.2</td>
<td>Facility Operations</td>
<td>6</td>
</tr>
<tr>
<td>2.0</td>
<td>Intent and Purpose of Plan</td>
<td>7</td>
</tr>
<tr>
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<td>Identification of Hazardous Materials</td>
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</tr>
<tr>
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<td>Alternate Emergency Coordinators</td>
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</tr>
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</tr>
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</tr>
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<td>8.5</td>
<td>Storage &amp; Treatment of Released Material &amp; Incompatible Waste</td>
<td>17</td>
</tr>
<tr>
<td>8.6</td>
<td>Post-Emergency Equipment Maintenance</td>
<td>18</td>
</tr>
<tr>
<td>8.7</td>
<td>Container Spills and Leakage</td>
<td>18</td>
</tr>
</tbody>
</table>
Automotive Airbag Recycling Exemption Request

APPENDIX F

Hazardous Waste Contingency Plan & Emergency Response Procedures

9.0 EMERGENCY EQUIPMENT ................................................................. 18
10.0 COORDINATION ARRANGEMENTS/COPIES OF CONTINGENCY PLAN .................................................. 19
11.0 EVACUATION PLAN ................................................................. 19
12.0 REQUIRED REPORTS ................................................................. 19
13.0 AMENDMENTS TO THE CONTINGENCY PLAN ...................................... 20
14.0 PROCEDURES TO PREVENT HAZARDS .......................................... 20
   14.1 Security Procedures and Equipment ........................................ 20
   14.2 Surveillance System ............................................................. 21
   14.3 Barriers and Means to Control Entry ...................................... 21
   14.4 Warning Signs ................................................................. 21
15.0 INSPECTION SCHEDULE ............................................................... 21
   15.1 Container Storage Area Inspection ...................................... 21
   15.2 Remedial Action ................................................................. 22
   15.3 Inspection Log ................................................................. 22
16.0 LOADING / UNLOADING OPERATIONS ........................................... 22
ATTACHMENTS

1. WASTE CHARACTERISTICS TABLE
2. EMERGENCY RESPONSE COORDINATORS
3. EMERGENCY TELEPHONE LIST
4. REPORTING FORM FOR EMERGENCY EVENTS
5. EMERGENCY REPORT
6. EMERGENCY EQUIPMENT
7. EMERGENCY RESPONSE CONTINGENCY PLAN DISTRIBUTION
8. DISTRIBUTION LETTER

EXHIBITS

1. FACILITY LAYOUT - INCLUDING EMERGENCY EQUIPMENT LOCATIONS AND EMERGENCY EXIT ROUTES.
2. TOPOGRAPHIC MAP
3. INSPECTION REPORTS
Automotive Airbag Recycling Exemption Request
APPENDIX F
Hazardous Waste Contingency Plan & Emergency Response Procedures

1.0 GENERAL INFORMATION (OAC 3745-54-52)

1.1 Facility Name and Location
This manual is applicable to USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc.

The specific location and mailing address of this facility are:

Specific Location
715 West Linfoot St
Wauseon, OH 43567

Mailing Address
PO Box 381
Wauseon, OH 43567

The general facility telephone, fax and email address are:

517.676.0044 phone, 517.676.4449 fax, usasales@cleanlites.com email

The Facility is owned by:
D&K Asset Management, LLC
665 Hull Road, PO Box 212
Mason, MI 48854

The Facility is operated by:
USA Lamp & Ballast Recycling, Inc
dba Cleanlites Recycling Inc.
715 West Linfoot Street
Wauseon, OH 43567

The facility is located geographically in Fulton County, Ohio at:

Latitude: 41° 33’ 30.636” N
Longitude: 84° 9’ 19.62” W

The facility is not located in a one-hundred-year flood. (OAC 3745-54-18)

The facility NAICS Code: 562920

1.2 Facility Operations
USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc (USA Lamp/Cleanlites) is a facility that recycles automotive airbags. The automotive airbags will arrive at USA Lamp/Cleanlites on a semi-truck trailer or box truck in boxes on pallets, in containers, or in DOT performance-oriented packing/containers. A USA Lamp/Cleanlites employee will data-record the units upon arrival. The automotive airbags are then staged and sent on for the processing of the automotive airbags. The processing involves unpacking the units and removing the plastics, fabric cushions, metals and inflator from the automotive airbag unit. The plastics, fabric cushions and remaining metals recovered from the automotive airbag unit are shipped to the appropriate downstream vendors for recycling. The inflators are brought to the Electronic Airbag Deactivation System for processing.
Automotive Airbag Recycling Exemption Request
APPENDIX F
Hazardous Waste Contingency Plan & Emergency Response Procedures

The inflators are taken to the room that houses the Electronic Airbag Deactivation System. The inflators are placed on a conveyor for entry into the Electronic Airbag Deactivation System. When the inflators process through the Electronic Airbag Deactivation System at a temperature of 600 degrees Celsius and reach the correct temperature, it will initiate a chain reaction and cause the inflators to deactivate.

After the inflators are processed in the Electronic Airbag Deactivation System and deactivated they will continue through a water quench for cooling. When the inflators are cooled they will be dumped into a large roll-off container and sent to a downstream recycler for scrap metals.

A detailed facility drawing showing the building, storage areas and other pertinent areas are outlined in Exhibit 1.

2.0 PURPOSE OF PLAN

USA Lamp & Ballast Recycling, Inc / Cleanlites Recycling, Inc are implementing steps which must be taken to minimize the effects to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil or surface water.

This Contingency Plan is intended to cover any imminent or actual emergency situation onsite or off-site during transport which could involve the release of materials where such release constitutes a hazard within the meaning of present laws. Situations which threaten human health, or the environment must be reported to local, state, and regional regulatory offices. However, efforts to control accidental releases are obligatory regardless of the quantities involved and whether reporting is required.

The purpose of this plan is to protect the safety and welfare of the employees and community in the event of an emergency incident and to comply with federal and state laws pertaining to universal / hazardous waste generators with respect to preparedness and prevention for emergency events.

The Contingency / Emergency Response Plan is intended as a guide of emergency procedures in the event of a fire, explosion, spill or release of universal/hazardous materials/wastes. This document is also intended as a reference source to familiarize local emergency response agencies, fire and police departments and area hospitals on operations relating to universal/hazardous materials/wastes and emergency response at the USA Lamp & Ballast Recycling, Inc / Cleanlites Recycling, Inc. facility.
3.0 IDENTIFICATION OF HAZARDOUS MATERIALS
OAC 3745-54-56 (B)

The automotive airbags being stored at USA Lamp / Cleanlites are potentially hazardous due to the sensitivity to fire. Attachment 1 provides a detailed list of all automotive airbags and components that maybe stored at the USA Lamp / Cleanlites facility. In the event of a fire/explosion and/or spill, the source will be identified visually to determine:

- The character of the released material;
- The exact source of the released material; and
- The amount of the released material.

If needed, the emergency coordinator will also refer to facility records and employee reports.

Once the material is identified, control measures will be implemented.

4.0 EMERGENCY COORDINATORS
OAC 3745-54-52 (D), 3745-54-55

4.1 Primary Emergency Coordinator

The Facility Manager is assigned as the primary Emergency Coordinator for the facility with the responsibility for coordinating all emergency response measures. He or she should be contacted first and if not available, the Alternate Emergency Coordinator will be contacted in the order listed in Attachment 2, “Emergency Response Coordinators”. The Wauseon Fire Department is the responding authority in the event of a fire at the facility. The Wauseon Fire Department has full authority as soon as they arrive at the site.

The Primary Emergency Coordinator along with the Corporate Safety & Compliance Officer are responsible for developing and maintaining the Contingency Plan and will, therefore, be thoroughly familiar with all aspects of the plan, all operations, and activities of the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. The Contingency plan and procedures will be periodically reviewed with revisions instituted as they become necessary due to changes in plant operations, equipment, and/or processes.

The above responsibilities of the Emergency Coordinator are consistent with the duties of Facility Manager. The duties include: the identification of materials and waste handled, identifying potential spill sources, administering the established waste analysis and inspection programs and keeping the appropriate plant operating records and hazardous waste manifest logs. He or she will coordinate all activities involved in implementing the goals of the Ohio Administrative Code 3745-54-50 through 3745-54-56 and 3745-65-50 through 3745-65-56 and
Automotive Airbag Recycling Exemption Request
APPENDIX F

Hazardous Waste Contingency Plan & Emergency Response Procedures

40 CFR 265 Sub-part D. The final responsibility is to keep facility personnel apprised of requirements of the regulations and make recommendations on related matters.

The Emergency Coordinator and Alternate Emergency Coordinators are authorized to commit resources necessary to implement the plan.

4.2 Alternate Emergency Coordinators

Employees designated as alternate Emergency Coordinators shall be thoroughly familiar with all aspects of the facility's Contingency Plan, all operations, and activities of the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. They shall be prepared to undertake all responsibilities of the Emergency Coordinator should the Primary Coordinator be unavailable and are authorized to commit resources necessary to implement the plan.

5.0 EMERGENCY TELEPHONE NUMBERS AND CONTACT INFORMATION

5.1 Emergency Coordinators

Attachment 2 “Emergency Response Coordinators” provides telephone numbers and addresses of the emergency coordinators to be contacted in the event of an emergency.

5.2 Emergency Contacts

Attachment 3 “Emergency Telephone List” provides telephone numbers for organizations (police, fire, etc.) that may be contacted by the Emergency Coordinator in the event of an emergency.

6.0 AVAILABILITY

An Emergency Coordinator will always be either on-site or on call. The primary Emergency Coordinator will be contacted first and if not available the others will be called until someone is reached. All personnel involved with emergency coordination carry a mobile phone.

7.0 IMPLEMENTATION
OAC 3745-54-52 (A), 3745-54-51

The decision to implement the contingency plans depends upon whether or not an imminent or actual incident could threaten human health or the environment. Implementation of this Contingency Plan is intended to mitigate or protect the facility and neighboring community from
Automotive Airbag Recycling Exemption Request

APPENDIX F

Hazardous Waste Contingency Plan & Emergency Response Procedures

injury; contamination of storm sewers with hazardous materials; damage to the environment; or a combination of these.

In the event that a fire or explosion is not controlled through use of portable fire extinguishers, the contingency plan will be implemented, and the facility evacuated.

7.1 Criteria

The purpose of this section is to provide guidance to the Emergency Coordinator in making decisions by providing decision-making criteria for an emergency.

The designated Emergency Coordinator will implement the Emergency Response Procedures of the Contingency Plan when human health or the environment is threatened by an imminent or actual emergency including:

7.1.1 Fires and/or explosions
(Implement Contingency Plan if fire is not controlled through use of portable fire extinguishers):

- Release dangerous fumes.
- Could ignite hazardous materials.
- Could spread off-site.
- Require use of water or fire suppressant resulting in contaminated run-off.
- Could release waste into the environment.
- Present a hazard due to imminent or actual explosion.

7.1.2 Spills or materials release

- Present a fire or explosion hazard.
- Could release toxic liquids or fumes.
- Present a potential for groundwater contamination.
- Present a potential for off-site pollution.

7.2 Authorization

The designated Emergency Coordinators are authorized to commit any and all necessary resources to implement the Contingency Plan.
8.0 EMERGENCY RESPONSE PROCEDURES

Types of emergency events covered by this Contingency Plan will vary in size, type of materials involved and location. For this reason, there is no universal remedy for all situations. The early discovery of an imminent, developing, or actual emergency situation depends upon alert, cooperative employees, good preventive maintenance practices and effective surveillance.

8.1 Notification
OAC 3745-54-56 (A) & (D)

Any employee witnessing an imminent, developing or actual emergency situation shall immediately notify the Emergency Coordinator or Alternates listed in Attachment 2. The primary emergency coordinator will be contacted first. If he or she is not available, an alternate emergency coordinator should be called in the order listed.

* If the Emergency Coordinator determines that an area or site evacuation is required, personnel will be notified in person or via the public-address system. The evacuation plans are shown on Exhibit 1. The Evacuation location is the front parking lot by West Linfoot Street.

* If the accident is beyond the plant’s capabilities or if a threat to human health or the environment exists to the extent that evacuation of the local areas may be advisable, the Emergency Coordinator will immediately notify 911 Emergency Services and request assistance and also, if necessary, contact local authorities listed in the Emergency Telephone List - Attachment 3.

* In the event evacuation is necessary, the Emergency Coordinator will immediately contact local authorities listed in Attachment 3 and be available to help those officials decide whether evacuation is necessary.

* The Emergency Coordinator must make the necessary reports as outlined in Attachments 4 and 5 for fires, explosions, or releases as required by specific regulation.

8.2 Assessment
OAC 3745-54-56 (C) & (D)

When contacted, the Emergency Coordinator will obtain information pertaining to the emergency to assess the possible hazards to human health and the environment as a result of a fire, release or explosion. Upon arrival, the Emergency Coordinator shall ensure that the following steps are taken and immediately notify the appropriate emergency personnel listed in Attachment 3 if necessary.

* Determine if any persons are injured and the seriousness of the injury.

* Determine if a release of hazardous / dangerous material has occurred or is imminent.
Hazardous Waste Contingency Plan & Emergency Response Procedures

- Identify the character exact source, amount, and extent of any released materials.
- Determine if other hazardous materials are endangered by the event and verify/institute operations for their protection and/or removal from the area.
- Verify that appropriate measures have or are being implemented to contain any spills and for the reduction of environmental impact.
- Assess possible hazards to human health or the environment that may result from the event and determine if the hazards will present a danger outside the facility. This assessment must include both direct and indirect effects of the event (e.g. the effects of any toxic, irritating, or asphyxiating gases that are generated or the effects of any hazardous surface water runoffs from water or chemical agents used to control fire.)

This information will help assess the magnitude and potential seriousness of the spill or release. If the accident is determined to fall within the company’s emergency response capabilities, the in-plant personnel should respond.

- The Emergency Coordinator will employ the following data procedures for the identification and quantities of hazardous materials involved in the emergency.

**Observation** - The identification may be based on the Emergency Coordinator’s thorough familiarity with all aspects of the facility operations, activities, location and characteristics of hazardous materials.

**Record Review** - A review of facility records or manifests and Material Safety Data Sheets (MSDS) are available for materials used at this facility. The master file is maintained by the Emergency Coordinator.

**MSDS contain the following information:**

- Supplier name, emergency phone number, and address.
- Trade name, chemical name, family and synonyms.
- Hazardous ingredients.
- Physical data.
- Fire and explosion data.
- Health hazard data.
- Reactivity data.
- Spill or leak procedures.
- Special protection and precautions information.

**Chemical analysis** - If necessary, the Emergency Coordinator can submit materials for chemical analysis to determine hazardous characteristics, or to determine source, amount or extent of release.
8.3 Response / Control Procedures
OAC 3745-54-52 (A)

Upon arrival of the Emergency Coordinator, the first responder shall advise him of the extent of the incident, actions being taken to combat and contain the event. Trained personnel assigned by the Emergency Coordinator will assist in the notification, control, and post-emergency actions if the Contingency Plan is implemented. All injured persons will be removed, and medical treatment will be administered by trained personnel. The first responder shall take initial steps to prevent the event from spreading which might endanger chemicals or other hazardous materials in the area. If possible, these materials shall be moved to a safe area.

The Emergency Coordinator shall direct clean-up operations concerning:

- Clearing unnecessary persons from the hazard area.
- Ensuring proper protective equipment and clothing is worn.
- Removing all ignition sources, if flammable materials are involved.

8.3.1 FIRE / EXPLOSION
OAC 3745-65-52

The following actions will be taken if the container accumulation area is affected by fire or explosion:

1. An alarm will be sounded to the main office. Work in all areas will be shut down until the area is safely restored.

2. The Emergency Coordinator will be contacted.

In the event of a fire:

a. If the employee has had the appropriate training, the employee may use nearby fire fighting equipment to provide early containment of the fire to significantly reduce the total damage. HOWEVER, FIRE FIGHTING ACTIVITIES THAT MAY CAUSE INJURY TO THE PERSONS INVOLVED SHOULD NOT BE PERFORMED.

b. If USA Lamp & Ballast personnel cannot safely and effectively perform corrective action in the event of a fire and/or explosion, the emergency coordinator must:

i. Assess possible hazards to human health and the environment that may result from the fire and/or explosion. This includes:

   A. Person(s) injured and seriousness of injury

   B. Location of any spill, leak, or fire material involved and source.
Hazardous Waste Contingency Plan & Emergency Response Procedures

a. Type of material that has spilled, is leaking and/or is involved in the fire/explosion

b. The approximate amount of material spilled and estimate of the liquid discharge rate and the direction of the liquid flow.

t. Notify 911 Emergency Services of the situation and request appropriate assistance. Assign a worker at the facility entrance to direct emergency service personnel. If necessary, contact the local fire department and other emergency response organizations as listed under Attachment 3. The Wauseon Fire Department is the responding authority in the event of a fire at the facility. The Wauseon Fire Department has full authority as soon as they arrive at the site.

3. Operating equipment will be shut down as necessary and practical

4. If the Emergency Coordinator determines that an area or site evacuation is required, personnel will be informed via the facility paging system and telephone. Designated employee runners will be sent as a backup to the areas to be evacuated and direct personnel away from the danger area. Evacuation route maps have been posted throughout the building. The evacuation assembly location is the front parking lot by West Linfoot Street at the Emergency Gathering Point Sign. Employees will be notified by supervisory personnel when the emergency is under control and it is safe to re-enter the facility. The evacuation plan is shown on Exhibit 1.

5. All injured persons will be removed, and medical treatment will be administered by trained personnel.

6. During an emergency, the Emergency Coordinator must take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur, or spread to other hazardous material/waste at the facility. These measures must include, where applicable, stopping processes and operations, collection and contain released waste, and removing and isolating applicable containers.

7. The Emergency Coordinator must evaluate the facility’s emergency equipment to determine if USA Lamp/Cleanlites personnel can handle the correction action and clean-up. A list of the emergency equipment is found under Attachment 6.

8. If USA Lamp/Cleanlites personnel can safely and effectively perform corrective action and clean-up the following steps are to be taken under the authorization of the Emergency Coordinator (ONLY AFTER THE RESPONSE PERSONNEL PUT ON THE APPROPRIATE PROTECTIVE CLOTHING):

   a. Eliminate all possible sources of ignition

   b. Clean up the released / affected material from the fire or explosion spill control procedures listed in sections 8.3.2.

9. For fires that cannot be controlled using portable fire extinguishers the Emergency Coordinator must make the necessary reports as outlined in Attachments 4 and 5.
8.3.2 **SPILLS**  
OAC 3745-55-52

The following actions will be taken in response to a spill of hazardous material:

1. An alarm will be sounded. Work in all areas will be shut down until the area is safely restored.

2. The Emergency Coordinator will be contacted.

3. The Emergency Coordinator must immediately identify the character, exact source, and extent of any released materials. The Emergency Coordinator will obtain the following information:
   - Person(s) injured and seriousness of injury.
   - Location of spill, leak, or fire and material involved and source
   - Type of material that has spilled, is leaking, or burning.
   - The approximate amount of material spilled, an estimate of the liquid discharge rate and direction of liquid flow. An estimate of the size or the fire and location.

4. The Emergency Coordinator must evaluate the facility’s emergency response equipment to determine if USA Lamp/Cleanlites personnel can handle the corrective action and clean-up. A list of the emergency response equipment is found in under **Attachment 6**.

5. If USA Lamp/Cleanlites personnel can safely and effectively perform corrective action and clean-up the following steps are to be taken under the authorization of the Emergency Coordinator (ONLY AFTER THE RESPONSE PERSONNEL PUT ON THE APPROPRIATE PROTECTIVE CLOTHING):
   - Immediately set up a barrier to alert unauthorized personnel to keep out, if evacuation has not occurred. If necessary, set up protective zones (hot, warm, cold, decontamination, etc) to warn personnel.
   - Eliminate all possible sources of ignition and leakage.
   - Immediately begin containment by placing absorbent material on the spill.
   - Set up decontamination zone to ensure proper decontamination procedures.
   - Place contaminated absorbent into DOT approved containers.
   - Any drummed cleanup materials are to be managed as hazardous waste until proper analysis has shown otherwise.
Automotive Airbag Recycling Exemption Request

APPENDIX F

Hazardous Waste Contingency Plan & Emergency Response Procedures

- Drums of cleanup material are to be properly labeled.
- Assigned personnel to continue to cleanup and remove all residues until all contamination hazards are eliminated.

6. For large spills: If USA Lamp/Cleanlites personnel cannot safely and effectively perform corrective action in the event of a spill, the Emergency Coordinator must:
   - Assess possible hazards to human health and the environment that may result from the spill.
   - Contact the local fire department and other emergency response organizations as listed under Attachment 3.

7. During an emergency, the Emergency Coordinator must take all reasonable measures necessary to ensure that fires and explosions and releases do not occur, recur, or spread to other hazardous material waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing and isolating containers.

8. The Emergency Coordinator must make necessary reports as outlined in Attachments 4 and 5.

9. After cleanup has occurred, the Emergency Coordinator must ensure that, in the affected area of the facility:
   - No waste may be incompatible with the released material stored.
   - All emergency equipment listed in the emergency response contingency plan is cleaned and fit for its intended use before resuming operations.
   - All disposable equipment used during the incident is replaced with new equipment in the appropriate area. All floors and any other equipment are decontaminated with an appropriate cleaning agent.

8.4 Containment / Prevention of Recurrence or Spread of Fires, Explosions, or Releases
OAC 3745 54-56 (E) & (F)

Once the initial assessment of the situation is complete and proper notifications have been made, the Emergency Coordinator must ensure that all reasonable measures are being taken, including the following:

1. That a release, fire or explosion does not occur, reoccur or spread to other material at the facility.
Automotive Airbag Recycling Exemption Request
APPENDIX F
Hazardous Waste Contingency Plan & Emergency Response Procedures

2. That any ongoing facility operations threatening the control of the event are shut down and the Emergency Coordinator or designated personnel will monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment if necessary and appropriate.

3. That any required assistance from state and local response teams, contractors or local authorities have been requested and are available.

4. That proper steps are being taken to contain and collect released hazardous materials and removing or isolating containers.

5. That dangers to facility utilities (gas, water, electricity, etc.) are minimized and that monitoring of such systems is being accomplished by designated facility personnel.

The Emergency Coordinator shall direct actions to contain any waste from fire fighting activities or any contaminated water from escaping to the environment. This shall entail but not be limited to:

- Spread absorbent material to soak up liquid material and prevent any liquids from escaping the facility.

- If possible, try to stop the leak by plugging or covering the area with patch.

8.5 Storage and Treatment of Released Material and Incompatible Waste
OAC 3745-54-56 (G) and OAC 3745-54-56 (H)(1)

The Emergency Coordinator shall ensure:

- Material resulting from a release, fire or explosion is placed in DOT approved containers.

- No incompatible waste is treated, stored or located in the affected areas until clean-up procedures are completed.

- Any drummed cleanup materials are to be managed as hazardous waste until proper analysis has shown otherwise.

- Drums of cleanup material are to be properly labeled, containerized and stored.

- Assigned personnel are to continue to cleanup and remove all residue until all contamination hazards are eliminated.

- Recovered waste, contaminated soil or surface water, or any other results from a release, fire or explosion is disposed of properly and sent to the appropriate destination facility for treatment or disposal.
Automotive Airbag Recycling Exemption Request
APPENDIX F

Hazardous Waste Contingency Plan & Emergency Response Procedures

8.6 Post-Emergency Equipment Maintenance
OAC 3745-54-56 (H)(2)

Immediately after an emergency event requiring the implementation of the contingency plan, all emergency equipment utilized will be inspected for proper function, completeness and condition. The equipment used for spill clean-up will be documented on the emergency report form (Attachment 5). The equipment will be evaluated for hazardous characteristics, decontaminated, or properly disposed of in containers. Contamination will be determined through visual observation and sampling, if necessary.

Rinsewater from equipment decontamination will be collected in containers. The reagents, if contacted with hazardous material and the resulting residue will be managed as a hazardous waste unless laboratory results indicate otherwise. Other rinsewaters will be managed in accordance with all applicable laws.

Before resuming operations, all emergency equipment listed in the Emergency Response Contingency Plan will be cleaned and fit for its intended use and all disposable equipment used during the incident will be replaced with new equipment in the appropriate area.

The Director and appropriate local authorities will be notified that the facility is in compliance with 3745-54-56(H) before operations are resumed in the affected areas.

8.7 Container Spills and Leakage
OAC 3745-54-52, 3745-54-56 (G), 3745-55-71

Should a container develop a leak during handling, the contents will be immediately transferred to a suitable approved container. In the event of a more serious leak or rupture the entire drum will be put into an "overpack drum" for containment.

If the area in which the container(s) were located requires decontamination, trained personnel will follow necessary procedures listed in Section 8.3.2 — Spills.

9.0 EMERGENCY EQUIPMENT
OAC 3745-54-52 (E)

A list of all Emergency equipment at the facility is contained in Attachment 6. Exhibit 1 shows the location of the emergency equipment.

The Emergency equipment list and locations will be reviewed periodically and updated as necessary. If the Emergency equipment list and / or locations change the Contingency plan will be amended.
10.0 COORDINATION AGREEMENTS / COPIES OF CONTINGENCY PLAN
OAC 3745-54-52 (C), 3745-54-37 / OAC 3745-54-53

The Contingency Plan promotes routine contact with the area fire and police departments, OH EPA and hospitals. Attachment 7 provides a list of contacts for the contingency plan distribution. Attachment 8 provides a sample distribution letter that accompanies the Contingency Plan distribution.

The Wauseon Fire Department is the responding authority in the event of an emergency at the USA Lamp/Cleanlites facility. The fire department makes periodic inspections of the facility and is informed of facility arrangements. The fire department has full authority as soon as they arrive at the site.

USA Lamp/Cleanlites will document any refusals to enter into a coordination agreement.

USA Lamp/Cleanlites will maintain copies of the Contingency plan at the facility and will distribute to local fire and police departments, OH EPA and local hospital. Attachment 7 provides a list of contacts for the contingency plan distribution. Attachment 8 provides a sample distribution letter that accompanies the Contingency Plan distribution.

11.0 EVACUATION PLAN
OAC 3745-54-52 (F)

When evacuation is necessary personnel will be informed via the fire alarm. Designated employee runners will be sent as a backup to the areas to be evacuated and direct facility personnel away from the danger area in an upwind direction where possible. Evacuated personnel should go to the nearest safe location and await instructions. Evacuation route maps have been posted throughout the building showing primary and alternate evacuation routes and assembly points. Determining when, and if, the plant is to be evacuated is the responsibility of the Emergency Coordinator or his designee. If plant evacuation occurs, employees will be notified by supervisory personnel when the emergency is under control and it is safe to re-enter the plant.

Due to the open design of the building, there should be little, or no problem of escape should an emergency occur. All exits are appropriately marked. Evacuation route maps are posted throughout the building. Supervisory personnel will direct employees to the evacuation exit and to the assembly point for a head count. Areas not affected by the emergency will continue operating in a normal manner. Re-entry into the area will be made only after clearance is given by the Emergency Coordinator.

12.0 REQUIRED REPORTS
OAC 3745-54-56 (J)

The time, date, and details of any incident that requires implementing the contingency plant will be noted in the operating record of the facility.
Hazardous Waste Contingency Plan & Emergency Response Procedures

A report will be submitted to the director within 15 days after an incident that requires implementation of the Contingency Plan. Attachment 4 and Attachment 5 show the required reporting forms.

13.0 AMENDMENTS TO THE CONTINGENCY PLAN
OAC 3745-54-54

In accordance with OAC 3745-50, the Contingency Plan will be reviewed and immediately amended, if necessary, whenever:

- The facility needs updated on a yearly review.
- The plan fails in an emergency.
- The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or release of hazardous material or hazardous materials constituents, or changes in the response necessary in any emergency.
- When a change is required by the director.
- The list of emergency coordinators changes.
- The list of emergency equipment changes.

14.0 PROCEDURES TO PREVENT HAZARDS

14.1 Security Procedures and Equipment
OAC 3745-50-44 (A)(4), 3745-54-14 (B)

Outside lighting is provided at the site along a security alarm system. The facility telephone system allows for communication outside the facility and has internal telephones for communication between the offices. The telephones are immediately available to summon emergency assistance. There is continual video monitoring of the inflator processing area, storage area, receiving area and front entrance. Visitors and contractors entering the building must present themselves to the front office personnel and receive permission prior to entering the recycling operation areas.
14.2 **Surveillance System**  
OAC 3745-54-14 (B)(1)  

Security at Cleanlites Recycling, Inc is maintained by a security alarm system which is activated during non-working hours, 7 days a week. The entrances are accessed through a keyed lock and by a security alarm code. Cameras are located in the storage and recycling areas and continuously monitor activities.

14.3 **Barrier and Means to Control Entry**  
OAC 3745-54-14 (B)(2)(a) / OAC 3745-54-14 (B)(2)(b)  

Entrance inside the facility is controlled through an automated alarm system. Alarm keypads are located at the inside the facility.

14.4 **Warning Signs**  
OAC 3745-54-14 (C)  

Signs with the legend “Danger — Unauthorized Personnel Keep Out,” are posted at each entrance to the active portion of the facility and are legible from a distance of 25 feet.

15.0 **INSPECTION SCHEDULE**  
OAC 3745-50-44 (A)(5), 3745-54-15 (A), (B)(1) & (B)(2), 3745-54-33  

Cleanlites Recycling, Inc conducts a regular inspection (performs daily checks and records weekly and / or monthly) of the facility for equipment malfunctions, structural deterioration, operator performance, and discharges that could cause or lead to the release of hazardous materials or non-hazardous materials constituents and adversely affect the environment or threaten human health. Facility communication and alarm systems, fire protection, spill control and decontamination equipment are tested and maintained to assure proper operation at a time of an emergency.

Cleanlites Recycling, Inc inspections are kept on site for three (3) years.

15.1 **Container Storage Area Inspection**  
OAC 3745-50-44 (A)(5), 3745-55-74  

Inspections of the container storage areas will be conducted per the inspection schedule. Results of each inspection will be recorded on the inspection log sheets. Information requested on the log sheets includes the inspector’s name and title, date and time of inspection, item of inspection, typical problems encountered, status of the item, observations, and the date and nature of repairs and remedial action. Typical problems encountered with each item of inspection, included in the inspection schedule, are provided on the log sheet to serve as a reminder to the inspector and to ensure a complete inspection. The inspector is required to
check the status of each item and indicate whether its condition is acceptable or unacceptable. Regardless of the status, observations are made as to the number of containers, aisle space, inventory quantities, and more. If the status of a particular item is unacceptable, appropriate and complete information is recorded, including date and nature of repairs and remedial action.

15.2 Remedial Action
OAC 3745-54-15 (C)

If inspections reveal that non-emergency maintenance is needed, they will be completed as soon as possible to preclude further damage and reduce the need for emergency repairs. Any spilled or leaked materials are immediately cleaned up. Any sorbents or residues from the spill cleanup are disposed of properly. Leaking containers are properly overpacked in properly marked non-leaking containers. If an incident is imminent or has already occurred during the course of an inspection or any time between inspections, remedial action will be taken immediately. USA Lamp / Cleanlites personnel will notify the proper authorities per the Contingency Plan and initiate remedial actions. In the event of an emergency involving the release of hazardous constituents to the environment, efforts will be directed towards containing the hazard, removing it, and subsequently decontaminating the affected area. Documentation of any corrective actions taken is maintained in the inspection log. Refer to the Contingency Plan for further details.

15.3 Inspection Log
OAC 3745-54-15 (D)

All facility inspections will be recorded on a log or summary. An inspection log is maintained for each calendar year in a three-ring binder. As required, records of inspection are kept for 3 years from the date of inspection.

16.0 LOADING/UNLOADING OPERATION

Loading and unloading operations at the facility include:

UNLOADING

- Automotive Airbags are received and unloaded at the shipping dock. All material is identified and matched up with the shipping documents while unloading and prior to moving to the storage area. Vehicles are unloaded via hand or by forklifts with drum attachments, drum dollies and pallet jacks to prevent damage / hazards to containers and employees. The automotive airbags are stored in the automotive airbag storage area.
Automotive Airbag Recycling Exemption Request

APPENDIX F

Hazardous Waste Contingency Plan & Emergency Response Procedures

LOADING

- All materials are staged in the staging area according to the materials that are being prepped for shipping out to the downstream vendor for recycling.

- Several precautions have been taken to reduce the potential for hazards during unloading/loading operations. Materials that are being shipped out to downstream vendors via semitruck, the parking brake is secured during unloading/loading operations and the landing gear is down. Wheels will be chocked.

- The metals that are being shipped out for recycling will be placed in a roll off for transportation to a downstream vendor reclaiming the metals.
List of Hazardous Materials

- Air Bag (driver and passenger side)
- Side curtain airbags
- Seat belt pretensioners
- Inflators (ATF regulated)
- Modules (complete assembled units)
Please Note: Pages of this application which contain facility staff personal/home phone numbers have been removed from this web-available version of the document.

To review redacted copies of these removed pages, please contact DERR’s record management staff at (614) 644-2924.

Thank you.
# ATTACHMENT 3

Emergency Response Contingency Plan

## EMERGENCY TELEPHONE LIST

<table>
<thead>
<tr>
<th>EMERGENCY</th>
<th>ORGANIZATION / AGENCY</th>
<th>PHONE NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
<td>Injury</td>
<td>Wauseon Fire Department</td>
<td>419-335-7831 / 911</td>
</tr>
<tr>
<td></td>
<td>Fulton County Health Center ER</td>
<td>419-335-2015</td>
</tr>
<tr>
<td></td>
<td>Poison Control Center</td>
<td>800-222-1222</td>
</tr>
<tr>
<td></td>
<td>Ambulance / Fire Department</td>
<td>419-335-7831 / 911</td>
</tr>
<tr>
<td>Fire / Explosion</td>
<td>Wauseon Fire Depart / EMS</td>
<td>413-335-7831 / 911</td>
</tr>
<tr>
<td></td>
<td>Wauseon Police Department</td>
<td>413-335-3821 / 911</td>
</tr>
<tr>
<td>Hazardous Material</td>
<td>Chief Rick Sluder, Wauseon Ohio</td>
<td>419-335-7831 / 911</td>
</tr>
<tr>
<td>Natural Disaster</td>
<td>American Red Cross</td>
<td>419-329-2900</td>
</tr>
<tr>
<td>Spill / Release</td>
<td>Wauseon Fire Department</td>
<td>419-335-7831 / 911</td>
</tr>
<tr>
<td></td>
<td>OH EPA Emergency Response Team</td>
<td>800-282-8802</td>
</tr>
<tr>
<td></td>
<td>National Response Center</td>
<td>800-424-8802</td>
</tr>
<tr>
<td></td>
<td>Chief Rick Sluder, Wauseon Ohio</td>
<td>419-335-7831 / 911</td>
</tr>
<tr>
<td>Security</td>
<td>Wauseon Police Department</td>
<td>413-335-3821 / 911</td>
</tr>
<tr>
<td>Government Agencies</td>
<td>OH EPA Northwest District Office</td>
<td>419-352-8462</td>
</tr>
</tbody>
</table>
ATTACHMENT 4
Emergency Response Contingency Plan

Reporting Form for Emergency Events

Name, address and telephone number of owner / operator

Name, address and telephone number of facility

Name and telephone number of person reporting the incident

Date, time, and type of incident (e.g. fire, explosion etc.)

Name and quantity of material(s) involved

Extent of injuries (if any)

Assessment of actual or potential hazards to human health or the environment (if applicable)

Estimated quantity and dispositions of material recovered from the incident

Send to:
1. (Name)
   US EPA, Northwest Region
   Regional Administrator (EPA)
   Chicago, IL 60604

2. Chief
   Environmental Emergency Branch
   US EPA, Northwest Region

3. Director
   OH EPA
   Lazarus Government Building
   PO Box 1049
   Columbus, OH 43216-1049

Cleanlites Recycling, Inc
Wauseon, OH 43567

May 31, 2019
ATTACHMENT 5
Emergency Response Contingency Plan

Emergency Report

Emergency Report Incident No.

1. Type of emergency: Fire________, Spill________, Other________
2. Time of emergency: Date________________, Time________________
3. Location of Emergency: ________________________________
4. Description of Emergency and property involved
   ______________________________________________________
   ______________________________________________________
   ______________________________________________________
5. Materials involved and their hazards ________________________
6. Cause of Emergency____________________________________
   ______________________________________________________
   ______________________________________________________
7. If fire, source of ignition________________________________
8. Narrative account of fire/spill control measures
   ______________________________________________________
   ______________________________________________________
   ______________________________________________________
9. Extinguishing agents used (Itemize)
   ______________________________________________________
   ______________________________________________________
10. List other equipment used ________________________________
11. All clear announced by_______________________________
12. Emergency equipment restored to operating condition
   ______________________________________________________
13. Recommendations and remarks
   ______________________________________________________
   ______________________________________________________
   ______________________________________________________
14. Report Submitted By__________________________, Title__________

Cleanlites Recycling, Inc
Wauseon, OH 43567

May 31, 2019
## ATTACHMENT 6

**Emergency Response Contingency Plan**

### EMERGENCY EQUIPMENT

<table>
<thead>
<tr>
<th>PERSONNEL PROTECTIVE EQUIPMENT</th>
<th>CAPABILITIES OF EQUIPMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personal Protective Suits</td>
<td>Splash Protection</td>
</tr>
<tr>
<td>Gloves for spills</td>
<td>Hand Protection</td>
</tr>
<tr>
<td>Safety Glasses</td>
<td>Eye Protection</td>
</tr>
<tr>
<td>Goggles</td>
<td>Eye Protection</td>
</tr>
<tr>
<td>Hard Hats</td>
<td>Head Protection</td>
</tr>
<tr>
<td>Ear Protection</td>
<td>Hearing Protection</td>
</tr>
<tr>
<td>Industrial First Aid Kit and supplies</td>
<td>Minor First Aid</td>
</tr>
<tr>
<td>Fixed Eyewash Station</td>
<td>Eye Protection</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>FIRE RESPONSE EQUIPMENT</th>
<th>CAPABILITIES OF EQUIPMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Portable Fire Extinguishers</td>
<td>Water Mist, Class A&amp;C</td>
</tr>
<tr>
<td></td>
<td>Clean Agent, Class A, B &amp; C</td>
</tr>
<tr>
<td></td>
<td>CO2, Class B &amp; C</td>
</tr>
<tr>
<td></td>
<td>Dry Chemical, Class A, B &amp; C</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SPILL RESPONSE / DECONTAMINATION EQUIPMENT</th>
<th>CAPABILITIES OF EQUIPMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Protective Coats</td>
<td>Splash Protection</td>
</tr>
<tr>
<td>Protective Gloves</td>
<td>Hand Protection</td>
</tr>
<tr>
<td>Protective Goggles</td>
<td>Eye Protection</td>
</tr>
<tr>
<td>Soda Ash</td>
<td>Neutralization and Absorption</td>
</tr>
<tr>
<td>Kitty litter</td>
<td>Absorption</td>
</tr>
<tr>
<td>Shop Vacuum</td>
<td></td>
</tr>
<tr>
<td>Empty 55-gallon open head drums</td>
<td></td>
</tr>
<tr>
<td>85-gallon disposable (over pack) drums</td>
<td></td>
</tr>
<tr>
<td>Containment pallets</td>
<td></td>
</tr>
<tr>
<td>Shovels, brooms, buckets, mops</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>COMMUNICATION EQUIPMENT</th>
<th>CAPABILITIES OF EQUIPMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Telephone system in the office of the facility connected to outside lines</td>
<td>Communicate within and outside facility</td>
</tr>
<tr>
<td>Telephone located near north end entrance and loading docks.</td>
<td>Communicate within facility</td>
</tr>
<tr>
<td>Telephone pager used inside the facility to communicate in the offices and facility.</td>
<td>Monitor processing, storage and dock areas</td>
</tr>
<tr>
<td>Continuous video monitor located in the office with a camera in the lamping processing room and overlooking the storage area.</td>
<td></td>
</tr>
</tbody>
</table>
EXHIBIT 1
EMERGENCY RESPONSE CONTINGENCY PLAN

FACILITY LAYOUT
Cleaniites Recycling, Inc
715 W Linfoot Street
Wauseon, OH 43567
EXHIBIT 3
Emergency Response Contingency Plan

Daily Inspection Sheet

Date of Inspection ____________________
Inspector's Name ____________________  Inspector's Signature ____________________

<table>
<thead>
<tr>
<th>Item</th>
<th>Requirements</th>
<th>Compliant</th>
<th>Document any &quot;NO&quot; actions taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operational Safety</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1</td>
<td>Processing work tables grounded?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.2</td>
<td>Ancillary equipment guards on and in place?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.3</td>
<td>Emergency Response communication methods available?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.4</td>
<td>Daily machine checks completed</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Automotive Airbag (modules &amp; inflators) storage</td>
<td>2.0 Automotive Airbag containers free of severe damage or neglect?</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2.1 Automotive Airbag storage area free of open flames or sparking equipment (within 25 ft)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2.2 Scrap recycling containers in good condition?</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2.3 The Electronic Airbag Deactivation System In sound working order?</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2.4 Aisle space maintained around the Automotive Airbag storage area?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Notes/comments
Automotive Airbag Recycling Exemption Request

Appendix G

FACILITY CLOSURE PLAN

USA Lamp & Ballast Recycling, Inc
dba Cleanlites Recycling, Inc
715 West Linfoot Street
Wauseon, Ohio 43567

May 31, 2019
Automotive Airbag Recycling Exemption Request
APPENDIX G – FACILITY CLOSURE PLAN

Background, Facility, and unit descriptions:

This document describes the plan that Cleanlites Recycling, Inc would follow at the cessation of automotive airbag processing at the facility in Wauseon, Ohio.

Automotive airbags that have been installed in a vehicle and then removed, would be a "spent material" and therefore a hazardous waste due to the characteristic of ignitability and reactivity (D001 & D003). This interpretation stems from the US EPA's November 30, 2018 Interim Final Rule: Safe Management of Recalled Airbags revisions to 40 CFR 260.10, CFR 261.4 and CFR 262.14.

For the purpose of this exemption request, Cleanlites Recycling, Inc will be managing automotive airbags that may be deemed Hazardous by the Ohio EPA at their facility located in Wauseon, Ohio. Cleanlites Recycling, Inc will be accepting Non-Hazardous airbags that have not been installed in a vehicle along with automotive airbags that may have been installed and found faulty and/or may be deemed hazardous by the Ohio EPA.

The term "automotive airbags" includes all the following automotive safety device units and terms:

- Airbags (driver and passenger side);
- Side curtain air bags;
- Seat belt pretensioners;
- Inflators (ATF regulated); and
- Modules (complete assembled units).

This plan describes the actions necessary to close the processing and storage of automotive airbags at 715 West Linfoot St Wauseon, OH.

Cleanlites Recycling, Inc has installed the Electronic Airbag Deactivation System at the Wauseon, Ohio location. The system will not generate any waste.

Owner/Operator names(s):

OPERATOR
USA Lamp & Ballast Recycling, Inc.
dba Cleanlites Recycling Inc.
715 West Linfoot Street
Wauseon, OH 43567

LEGAL OWNER
D & K Asset Management, LLC
665 Hull Road, PO Box 212
Mason, MI 48854

USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc is a privately-held corporation

Address of the Cleanlites Recycling, Inc facility that will process the Automotive Airbags:
715 West Linfoot Street
Wauseon, OH 43567

Latitude: 41° 33’ 30.636” N
Longitude: 84° 9’ 19.62” W

Cleanlites Recycling, Inc
Wauseon, OH 43567

Page 2 of 8
May 31, 2019
Automotive Airbag Recycling Exemption Request
APPENDIX G – FACILITY CLOSURE PLAN

Telephone Number: 517.676.0044

Owner of USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc: Thomas M Kimmel

Cleanlites Recycling, Inc Responsible Officials:
President/CEO: Thomas M Kimmel
Senior Vice President: Michael T Kimmel
Vice President: Timothy M Kimmel

EPA Identification Number: OHR 000 108 050
NAICS Code: 562920 Materials Recovery Facility

The hazard associated with the automotive airbag is ammonium nitrate that is used in the inflator to cause the deployment of an air bag in a vehicle in the event of an accident. Once the units are deployed, or the ammonium nitrate is negated, the automotive air bags do not present any other environmental hazards.

As stated above, these automotive airbags will be processed in an Electronic Airbag Deactivation System that includes a water quench for cooling the inflators after the deactivation process. The inflators will be loaded onto a conveyor belt inside an isolated room. The Electronic Airbag Deactivation System will slowly heat the inflators up to a temperature of 600 C. The temperature will cause a chain reaction and cause the inflators to deactivate. This method is completed in a controlled environment away from personnel, creating the safest possible method to manage these units. The Electronic Airbag Deactivation System is designed to ensure that no automotive airbag can exit the processing procedure without being deactivated.

The main purpose of this process at Cleanlites Recycling, Inc is to remove the hazard from the automotive airbags and then recycle the metals from the inflators.

Cleanlites Recycling Inc. Commitment:

According to OAC 3745-55-11 Closure Performance Standard, Cleanlites Recycling, Inc is committed to closing the automotive airbag process to meet an un-restricted standard to ensure that it:

- Minimizes the need for further maintenance; and
- Controls, minimizes, or eliminates the threats to human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters, or to the atmosphere.
Automotive Airbag Recycling Exemption Request
APPENDIX G – FACILITY CLOSURE PLAN

Plan Description:

The Electronic Airbag Deactivation System is isolated to a specific area within the building, within a segregated room. Due to the nature of the automotive airbags (solid parts), the storage does not present a serious risk of contamination to the facility or the environment.

Hazardous Waste Inventory:

Prior to closing the Electronic Airbag Deactivation System operations, Cleanlites Recycling, Inc will process all automotive airbags and inflators in the building. There will be no unprocessed automotive airbags or inflators left at the site prior to the shutdown of the Electronic Airbag Deactivation System process.

Normal Processing Inventory:

Daily Average: 15,000 pounds per day
Daily Maximum: 36,000 pounds per day

Storage Quantities:

Maximum on-site storage of Automotive Air Bags (whole units): four (4) trailers (160,000 pounds)
Maximum on-site storage of Inflators (ATF Regulated): four (4) magazines (120,000 pounds)

Other waste and recyclable materials

Each automotive airbag is packaged in a cardboard box that contains a small piece of plastic foam, a wire harness and small metal brackets.

These by-products will all be collected and sent off site for recycling.

The automotive airbags based on their nature (solid automotive part), do not contain any other contaminates other than the ammonium nitrate that is addressed above.
Cleanlites Recycling Inc Maps:

Aerial map:

[Image of aerial map showing a facility layout with the word "Plant" marked within the area.]

Cleanlites Recycling Inc – Layout

[FACILITY MAP
Cleanlites Recycling, Inc
715 W Linfoot Street
Wauseon, OH 43567]
Automotive Airbag Recycling Exemption Request
APPENDIX G – FACILITY CLOSURE PLAN

Wastewater Plan

There will be no wastewater from the Electronic Airbag Deactivation System process.

The Electronic Airbag Deactivation System unit for the Automotive Airbags.

The following actions will be taken to ensure that no contamination remains in the area where the Automotive Airbags were stored or processed.

1. All water from the water quench operations will be removed.
2. All water will be evaluated and sent to the proper downstream vendor for disposal.
3. The Electronic Airbag Deactivation System and ancillary equipment will be cleaned thoroughly. Any waste resulting from the cleaning will be evaluated, profiled, and disposed of properly.
4. The area around the Electronic Airbag Deactivation System process will be thoroughly cleaned. Any waste resulting from the cleaning will be evaluated, profiled, and disposed of properly.
5. All cardboard, plastic or paper will be collected and sent off-site for recycling.
6. All metals will be shipped off-site to a metal recycler.

The Electronic Airbag Deactivation System and surrounding equipment and floors will undergo cleaning with a high-power pressure washer. All wastewater will be collected and tested as part of the testing addressed above. The wastewater will then be contained and sent to a downstream vendor for disposal.

Inspections:

Cleanlites Recycling, Inc will inspect all areas where Automotive Airbags were stored and processed.

The Electronic Airbag Deactivation System area and airbag storage area(s):

After the areas are thoroughly cleaned, an inspection will take place reviewing all the following items:

1. All waste has been properly removed.
2. All floors and walls are free and clear of any contaminations.
3. The Electronic Airbag Deactivation System area and ancillary equipment are clean and free of any contamination.
4. All storage areas are clean and free of contamination.

Cleanlites Recycling, Inc will document this inspection and take pictures of each area.

Record keeping:

Cleanlites Recycling, Inc will maintain records of the following;

- Closure notice to Ohio EPA
- Documentation describing the closure activities.
- Inspections of each area.
Automotive Airbag Recycling Exemption Request

APPENDIX G – FACILITY CLOSURE PLAN

- Photographs of each area.
- Records of any waste profiles.
- Records of any shipments of waste sent off-site
- Final summary report to Ohio EPA

Schedule:

<table>
<thead>
<tr>
<th>No.</th>
<th>Action description</th>
<th>Month 1</th>
<th>Month 2</th>
<th>Month 3</th>
<th>Month 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Process all remaining automotive airbags at the facility and ship the recycled metal off-site</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Notify Ohio EPA of the intent to close the Electronic Airbag Deactivation System process for automotive air bags</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Profile &amp; evaluate all wastewater involved in the Electronic Airbag Deactivation System</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Ship all wastewater from cleaning off-site to the proper disposal facility</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Clean the Electronic Airbag Deactivation System, ancillary equipment, and surrounding area thoroughly</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Evaluate, profile, and dispose of any waste from the cleaning of the Electronic Airbag Deactivation System and ancillary equipment.</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>7</td>
<td>Collect all cardboard, plastic, and metals and ship to downstream vendor for processing.</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>8</td>
<td>Inspect and photograph all areas where automotive air bags were stored and processed</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>9</td>
<td>Prepare a final summary report and submit to Ohio EPA</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>
Please Note: Pages of this application which contain facility staff personal/home phone numbers have been removed from this web-available version of the document.

To review redacted copies of these removed pages, please contact DERR’s record management staff at (614) 644-2924.

Thank you.
Automotive Airbag Recycling Exemption Request

Appendix H

Cost Estimate for Post-Closure Care

USA LAMP & BALLAST RECYCLING, INC
dba Cleanlites Recycling Inc.

715 West Linfoot Street
Wauseon, Ohio 43567
517.676.0044 phone | 517.676.4449 fax
wauseon@cleanlites.com

May 31, 2019
Facility Information Summary

I. GENERAL INFORMATION:

Facility Name: USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc

Owner/Operators name:

OPERATOR
USA Lamp & Ballast Recycling, Inc.
dba Cleanlites Recycling Inc.
715 West Linfoot Street
Wauseon, OH 43567

LEGAL OWNER
D&K Asset Management, LLC
665 Hull Road, PO Box 212
Mason, MI 48854

Cleanlites Recycling Inc. is a privately-held corporation

II. FACILITY INFORMATION:

Type of Hazardous Waste Facility: Ohio EPA exempted Automotive Air Bags
Recycling

Type of Hazardous Waste Recycled: Automotive Air Bags (D001 & D003).

III. REASON FOR POST-CLOSURE COST ESTIMATE:

X New Facility

☐ Existing Facility

☐ Annual Update

☐ Modification

☐ Alteration

☐ Other

Ohio EPA ID # OHR 000 108 050
IV. Basis for Estimate

What is the basis for the cost estimate:

Maximum Waste on-site-disposal cost & transportation, industrial cleaning cost, sampling cost, waste water disposal cost including transportation and consultant/engineering fees. Fees are based on costs from waste disposal companies, laboratory costs, transportation cost and consultant/engineering cost.

Identify the third-party providing the post closure estimates:

Resource-One
6043 Interstate Circle
Cincinnati, OH 45242
513-247-0175
### Waste Disposal Cost

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Total Item Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Disposal of maximum on-site Automotive Airbags (modules) (D001, D003). Resource-One 2000 Mote Drive Covington, OH 45318</td>
<td>160,000 lbs.</td>
<td>$1.25/lb.</td>
<td>$250,000.00</td>
</tr>
<tr>
<td>b. Disposal of maximum on site Automotive Airbag Inflators- ATF regulated. (D001, D003). Resource-One 2000 Mote Drive Covington, OH 45318</td>
<td>120,000 lbs.</td>
<td>$1.25/lb.</td>
<td>$150,000.00</td>
</tr>
<tr>
<td>c. Cost to transport Automotive Air Bags (D001, D003) to Resource-One in Covington, OH. 8 trips</td>
<td>8 trips</td>
<td>$450.00/trip</td>
<td>$3600.00</td>
</tr>
<tr>
<td>d. Landfill cost for disposal of general waste.</td>
<td>1-40yard container</td>
<td>$450.00/container</td>
<td>$450.00</td>
</tr>
<tr>
<td>e. Transportation of the general waste to landfill</td>
<td>1-40yard container</td>
<td>$250.00/container</td>
<td>$250.00</td>
</tr>
<tr>
<td>f. Transportation of discharged Inflators to downstream recycler</td>
<td>1-40yard container</td>
<td>$150.00/container</td>
<td>$150.00</td>
</tr>
<tr>
<td><strong>Total- Waste Disposal Cost</strong></td>
<td></td>
<td></td>
<td><strong>$354,450.00</strong></td>
</tr>
</tbody>
</table>

*Disposal cost are based on Resource-One ($1.25/lb. for both inflators & modules)*
### Consultant/Engineering Services

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Total Item Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>a</td>
<td>Develop profile for automotive air bag disposal with Resource-One, Cincinnati, OH</td>
<td>2 hrs.</td>
<td>$75/hr.</td>
<td>$150.00</td>
</tr>
<tr>
<td>b</td>
<td>Contract labor to cleanup waste and load air bags onto transport vehicles</td>
<td>40 hrs.</td>
<td>$37.50/hr.</td>
<td>$1500.00</td>
</tr>
<tr>
<td>c</td>
<td>Evaluate lab data and complete waste profile for wastewater disposal</td>
<td>2 hrs.</td>
<td>$75/hr.</td>
<td>$150.00</td>
</tr>
<tr>
<td>d</td>
<td>Coordinate disposal of automotive air bags, wastewater, general trash and discharged metals. This includes filling out shipping papers and making &amp; labeling to Ohio EPA.</td>
<td>40 hrs.</td>
<td>$75/hr.</td>
<td>$3000.00</td>
</tr>
<tr>
<td>e</td>
<td>Consultant/Engineering overall management costs to manage project, including inspections and reporting to Ohio EPA</td>
<td>40 hrs.</td>
<td>$75/hr.</td>
<td>$3000.00</td>
</tr>
</tbody>
</table>

**Total – Consultant/Engineering Services**  
$7800.00

### SUMMARY OF COSTS:

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>Total- Waste Disposal Costs</td>
<td>$354,450.00</td>
</tr>
<tr>
<td>II</td>
<td>Total- Consultant/Engineering Services</td>
<td>$7800.00</td>
</tr>
<tr>
<td></td>
<td>Grand Total</td>
<td>$362,250.00</td>
</tr>
</tbody>
</table>
Automotive Airbag Recycling Exemption Request
Appendix I

Daily Inspection Sheet

Date of Inspection __________________________
Inspector’s Name ___________________________  Inspector’s Signature ______________________

<table>
<thead>
<tr>
<th>Item</th>
<th>Requirements</th>
<th>Compliant</th>
<th>Document any “NO” actions taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operational Safety</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1 Processing work tables grounded?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.2 Ancillary equipment guards on and in place?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.3 Emergency Response communication methods available?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.4 Daily machine checks completed</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Automotive Airbag (modules &amp; inflators) storage</td>
<td>2.0 Automotive Airbag containers free of severe damage or neglect?</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2.1 Automotive Airbag storage area free of open flames or sparking equipment (within 25 ft)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2.2 Scrap recycling containers in good condition?</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2.3 The Electronic Airbag Deactivation System In sound working order?</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2.4 Aisle space maintained around the Automotive Airbag storage area?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Notes/comments

Cleanlites Recycling, Inc
Wauseon, OH 43567

May 31, 2019
Automotive Airbag Recycling Exemption Request

Appendix J

AUTOMOTIVE AIRBAG RECYCLING PROCEDURES
(COVERS SAFETY ELEMENTS & PPE)

USA Lamp & Ballast Recycling, Inc
dba Cleanlites Recycling, Inc
715 West Linfoot Street
Wauseon, Ohio 43567

May 31, 2019
AUTOMOTIVE AIRBAG PROCESSING FLOWCHART
Mason, MI • Lakeville, MN • Cincinnati, OH • Spartanburg, SC • Wauseon, OH

RECEIVING

Automotive Airbags received for recycling at Cleanlites Recycling, Inc on signed, numbered, dated BOL/Manifest

Trained personnel evaluate the Automotive Airbags to ensure proper materials received and BOL/Manifest completed correctly

SORTING

Confirm that Automotive Airbags received are correct and match BOL/manifest

NO
Return to Sender. Note discrepancy on manifest

YES

DISASSEMBLY OF APPROVED AUTOMOTIVE AIRBAG MATERIALS

INFLATORS

PROCESSING

AUTOMOTIVE AIRBAG DEACTIVATION SYSTEM (ADS)

Off gasses captured with air filtration system and released

Inflators placed on conveyor belt to enter the ADS

Inflators placed in ADS deactivating inflators

After deactivation, inflators placed in water chamber for cooling

Cooled, deactivated inflators sent downstream to metal vendor and recycled

OTHER PERIPHERALS

Automotive Airbags disassembled for recycling. Separated into fabric cushions, plastics, metals and inflators components.

Plastics sent to downstream vendor for recycling

Fabric cushions sent to downstream vendor for recycling

Metals sent to downstream vendor for recycling

Cleanlites Recycling, Inc
Wauseon, OH 43567

May 31, 2019
Automotive Airbag Recycling Exemption Request

APPENDIX J

AUTOMOTIVE AIRBAG RECYCLING INSTRUCTIONS

WI-19

Issued by: QEHS  Eff. Date: 12/23/15  Rev.: A  Pg. 1 of 2

1.0 Purpose and Scope
To provide detailed instructions, directions and safety procedures for Airbag disassembly.

2.0 Affected Areas
Airbag Teardown

3.0 Requirements for Job performance of Automotive Airbag Teardown

3.1 Job Training must be completed

3.2 All OSHA and company required training must be completed

4.0 Instructions/Procedures

4.1 Receiving the Automotive Airbags
1. The Automotive Airbags are received in the teardown area and unpackaged.
2. Place Automotive Airbag to be disassembled on the wooden table top.

4.2 Disassembling the Automotive Airbag
1. Look at the Automotive Airbag and determine if the Automotive Airbag is Electronic or Manual. The Electronic Airbags will have wires on them and the Manual Airbags will not.

4.3 Electronic Automotive Airbags | Seat Belt Pretensioners
1. Two screwdrivers must be inserted on each side on the Automotive Airbag to hold the ball bearings in place.
2. Remove the plastic cover from the opposite side, remove screws.
3. Remove the seat belt from the Automotive Airbag by removing the pin.
4. Place all materials in proper containers for recycling.

4.4 Manual Automotive Airbags | Seat Belt Pretensioners
1. Remove the plastic cover
2. Remove the seat belt by removing the pin.
3. Place all materials in proper containers for recycling.
4.5 Steering Wheel Automotive Airbags | Side Automotive Airbags

1. On the back side of the Automotive Airbag will be one of the following: screws, plastic clips, or rivets.

2. The screws will be removed, or the plastic clips cut or the rivets drilled out.

3. The plastic will be removed from the Automotive Airbag and placed in a container for recycling.

4. The inflator will be removed from the fabric cushion and both placed with like materials.

4.6 Recycling the Materials

1. After the containers are full, with plastic, fiber cushions, they will be moved to a holding area for recycling.

2. The inflators will be taken to the Electronic Automotive Air Bag Deactivator for recycling.

5.0 Operations

- Know the hazards of operation see operational manual and know,
- Electrical
- Physical
- Ergonomic
- Wear appropriate PPE (Personal Protective Equipment):
- Safety Glasses
- Gloves
- Steel toed shoes may be required when operating
- Follow all established policies and procedures. When in doubt, ask your supervisor for guidance.
- Follow all the operating/work instructions, safety rules and maintenance procedures.
- Never have flames or sparks within 25 feet or Automotive Airbags.
- Never place liquids near the electrical controls.
- Clean the work area and the floors when finished. Avoid collecting dust on the floor to prevent slips and falls.
**JOB SAFETY ANALYSIS**

**Automotive Airbag Disassembly**

**Location:** Wauseon  
**EHS Functionary:** Benny Coyt  
**Date:** 5/24/2019  
**Shift:** 1st Shift  
**Verified By:** Benny Coyt EHS Manager

<table>
<thead>
<tr>
<th>Required PPE</th>
<th>Head/face</th>
<th>Hands</th>
<th>Body</th>
</tr>
</thead>
<tbody>
<tr>
<td>All positions on the working floor require safety glasses</td>
<td>Cut Resistant Gloves</td>
<td>Apron</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Activity/Job Task</th>
<th>Tools Used</th>
<th>Hazards</th>
<th>Controls</th>
</tr>
</thead>
<tbody>
<tr>
<td>Remove Automotive Airbag from shipping container</td>
<td>Razor Knives</td>
<td>Cuts from removing the Automotive Airbag.</td>
<td>Cut Resistant Gloves</td>
</tr>
<tr>
<td>Disassembling the Automotive Airbag</td>
<td>Wire Snips, possible screwdrivers and drill</td>
<td>Cuts from the wire snips</td>
<td>Cut Resistant Gloves</td>
</tr>
<tr>
<td>Place different components in proper recycling containers</td>
<td>None</td>
<td>Possible back strain and possible cuts.</td>
<td>Proper ergonomic training and long sleeves</td>
</tr>
</tbody>
</table>

**Hazardous Chemicals**

<table>
<thead>
<tr>
<th>Chemicals</th>
<th>Hazards</th>
<th>Health</th>
<th>Flammable</th>
<th>Reactive</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ammonium Nitrate</td>
<td>Eye Damage/Eye Irritation. Intensify Fire</td>
<td>2</td>
<td>0</td>
<td>4</td>
</tr>
</tbody>
</table>

**Amount (%) of job/task spent:**

- Standing: 80%
- Sitting: 0%
- Walking: 20%

**Additional Comments**
## PPE Hazard Assessment Form

### EYES/FACE

<table>
<thead>
<tr>
<th>Hazards such as:</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ exposure to sparks</td>
</tr>
<tr>
<td>☒ flying objects/chips/ sand/dirt</td>
</tr>
<tr>
<td>☐ dust/particles</td>
</tr>
<tr>
<td>☐ drilling</td>
</tr>
<tr>
<td>☐ welding sparks/light</td>
</tr>
<tr>
<td>☐ chemical-liquid/mists</td>
</tr>
<tr>
<td>☐ other:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Work-related exposure to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ sun exposure/glare</td>
</tr>
<tr>
<td>☒ high intensity lights</td>
</tr>
<tr>
<td>☐ sawing debris</td>
</tr>
<tr>
<td>☐ grinding sparks</td>
</tr>
<tr>
<td>☐ hammering</td>
</tr>
</tbody>
</table>

**Can hazard be eliminated without the use of PPE?** Yes ☐ No ☒

*If no. use:* ☒ Safety glasses
☐ Safety goggles
☐ Face shield
☐ Shading/Filter (#______)
☐ Dust-tight goggles
☐ Welding shield
☐ Side shields
☐ Other:

### HEAD

<table>
<thead>
<tr>
<th>Hazards such as:</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ strike by falling objects</td>
</tr>
<tr>
<td>☐ strike against fixed objects</td>
</tr>
<tr>
<td>☐ contact with exposed electrical wiring/conductor</td>
</tr>
<tr>
<td>☐ confined space operations</td>
</tr>
<tr>
<td>☐ walking/working under racking/conveyor belts</td>
</tr>
<tr>
<td>☐ other: NA</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Work-related exposure to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ beams</td>
</tr>
<tr>
<td>☐ pipes</td>
</tr>
<tr>
<td>☐ exposed electrical wiring or components</td>
</tr>
<tr>
<td>☐ falling objects</td>
</tr>
<tr>
<td>☐ machine parts</td>
</tr>
<tr>
<td>☐ other: NA</td>
</tr>
</tbody>
</table>

**Can hazard be eliminated without the use of PPE?** Yes ☒ No ☐

*If no. use:* ☐ Hard Hat/Cap (Class: _____)
☐ Hair net or soft cap
☐ Other:

### HANDS/ARMS

<table>
<thead>
<tr>
<th>Hazards such as:</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ cuts/punctures</td>
</tr>
<tr>
<td>☐ chemicals</td>
</tr>
<tr>
<td>☐ grinding</td>
</tr>
<tr>
<td>☐ welding</td>
</tr>
<tr>
<td>☐ other:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Work-related exposure to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ blood</td>
</tr>
<tr>
<td>☐ irritating chemicals</td>
</tr>
<tr>
<td>☐ tools or materials that could scrape, bruise, or cut</td>
</tr>
</tbody>
</table>

**Can hazard be eliminated without the use of PPE?** Yes ☐ No ☒

*If no. use:* ☒ Gloves
☐ General purpose work
☐ Chemical resistance (Type: _____)
☐ Liquid/leak resistance

---

Cleanlites Recycling, Inc  
Wauseon, OH 43567  
Page 1 of 4  
May 31, 2019
<table>
<thead>
<tr>
<th>FEET/LEGS</th>
<th>Work-related exposure to:</th>
<th>If no use:</th>
</tr>
</thead>
</table>
| Hazards such as:
| • impact-heavy objects
| • compression-rolling/pinching objects
| • slippery/wet surfaces
| • cuts/penetration-sharp objects
| • chemicals
| • extreme heat/cold
| • welding
| • other: ___ |
| Can hazard be eliminated without the use of PPE? Yes ☐ No ☒ |
| Work-related exposure to:
| • explosive atmospheres
| • hazardous chemicals/liquids
| • exposed electrical wiring or components
| • heavy falling/rolling objects
| • heavy equipment
| • slippery surfaces
| • tools
| • other: ___ |
| If no use:
| • Safety shoes or boots
| • Toe protection
| • Electrical protection
| • Puncture resistance
| • Anti-slip soles
| • Leggings or chaps
| • Foot-Leg guards
| • Other: ___ |

<table>
<thead>
<tr>
<th>BODY/SKIN</th>
<th>Work-related exposure to:</th>
<th>If no use:</th>
</tr>
</thead>
</table>
| Hazards such as:
| • impact-heavy objects
| • compression-rolling/pinching objects
| • slippery/wet surfaces
| • cuts/penetration-sharp objects
| • chemicals
| • extreme heat/cold
| • elevated walking/working surface
| • other: ___ |
| Can hazard be eliminated without the use of PPE? Yes ☒ No ☐ |
| Work-related exposure to:
| • hazardous chemicals/liquids
| • extreme heat/cold
| • sharp or rough edges
| • working from heights of 4 feet or more
| • working near water
| • other: ___ |
| If no use:
| • Vest, Jacket
| • Coveralls, Body suit
| • Apron
| • Welding leathers
| • Abrasion/cut resistance
| • Fall Arrest/Restraint: Type: ___ 
| • PFD: Type: ___ 
| • Other: ___ |

<table>
<thead>
<tr>
<th>LUNGS/RESPIRATORY</th>
<th>Work-related exposure to:</th>
<th>If no use:</th>
</tr>
</thead>
</table>
| Hazards such as:
| • dust/mist
| • welding fumes
| Can hazard be eliminated without the use of PPE? Yes ☒ No ☐ |
| Work-related exposure to:
| • irritating dust or particulate
| • irritating or toxic gas/vapor
| | Respirator (Cartridge Type: ___ )
| | Particulate Mask

Cleanlites Recycling, Inc
Wauseon, OH 43567

Page 2 of 4

May 31, 2019
<table>
<thead>
<tr>
<th>Painting</th>
<th>Other:</th>
<th>Other:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fiberglass installation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compressed air or gas operations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other: _____</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Ears/Hearing

<table>
<thead>
<tr>
<th>Hazards such as:</th>
<th>Work-related exposure to:</th>
<th>If no, use:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exposure to noise levels (&gt;85dBA 8-hr TWA)</td>
<td>Loud noises</td>
<td>Ear Plugs</td>
</tr>
<tr>
<td>Extreme heat/cold</td>
<td>Loud work environment</td>
<td>Ear Muffs</td>
</tr>
<tr>
<td>Other: _____</td>
<td>Noisy machines/tools</td>
<td>Other:</td>
</tr>
</tbody>
</table>

**Completed By:**

- **Date:** 5-24-19

**Approved By:**

- **Date:** 5-24-19
<table>
<thead>
<tr>
<th>Description</th>
<th>Initial Release of Document</th>
<th>New Form</th>
<th>Sections Affected</th>
<th>All</th>
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<tbody>
<tr>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

### Record of Revisions

<table>
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<tr>
<th>Revision Date</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>12/20/14</td>
<td>6/6/17</td>
</tr>
</tbody>
</table>

### Record of Approval

<table>
<thead>
<tr>
<th>Task</th>
<th>Written By</th>
<th>Approved By</th>
<th>Revised &amp; approved By</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Adrian Frost</td>
<td>Tim Kimmel</td>
<td>Benny Coyt</td>
</tr>
<tr>
<td></td>
<td>VP Sales &amp; Marketing</td>
<td>EHS Manager</td>
<td></td>
</tr>
</tbody>
</table>

Cleanline Recycling, Inc
Wauseon, OH 43567

May 31, 2019
## Automotive Airbag Recycling Exemption Request - Appendix K

### Federal Explosives License/Permit

**18 U.S.C. Chapter 40**

In accordance with the provisions of Title XI, Organized Crime Control Act of 1970, and the regulations issued thereunder (27 CFR Part 555), you may engage in activity specified in this license or permit within the limitations of Chapter 40. Title 18, United States Code and the regulations issued thereunder, until the expiration date shown. **THIS LICENSE IS NOT TRANSFERABLE UNDER 27 CFR 555.63.** See "WARNINGS" and "NOTICES" on reverse.

<table>
<thead>
<tr>
<th>Direct ATF</th>
<th>License Permit Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>ATF - Chief, FELC</td>
<td>4-OH-051-34-2F-01199</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Correspondence To</th>
<th>Expiration Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>244 Needy Road, Martinsburg, WV 25405-9431</td>
<td>June 1, 2022</td>
</tr>
</tbody>
</table>

**Name**

Christopher K. Reeves

**Premises Address (Changes? Notify the FELC at least 10 days before the move.)**

**715 WEST LINFOOT STREET**

**WAUSEON, OH 43567**

<table>
<thead>
<tr>
<th>Type of License or Permit</th>
</tr>
</thead>
<tbody>
<tr>
<td>34-USER OF EXPLOSIVES</td>
</tr>
</tbody>
</table>

**Purchasing Certification Statement**

The licensee or permittee named above shall use a copy of this license or permit to assist a transferor of explosives to verify the identity and the licensed status of the license or permittee as provided by 27 CFR Part 555. The signature on such copy must be an original signature. A facsimile, scanned or e-mailed copy of the license or permit with a signature intended to be an original signature is acceptable. The signature must be that of the Federal Explosives Licensee (FEL) or a responsible person of the FEL. I certify that this is a true copy of a license or permit issued to the licensee or permittee named above to engage in the business or operations specified above under "Type of License or Permit."

<table>
<thead>
<tr>
<th>License/Permittee Responsible Person Signature</th>
<th>Position/Title</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Signature]</td>
<td>[Position/Title]</td>
<td>[03/13/2019]</td>
</tr>
</tbody>
</table>

**Federal Explosives License (FEL) Customer Service Information**

Federal Explosives Licensing Center (FELC)  
244 Needy Road  
Martinsburg, WV 25405-9431

<table>
<thead>
<tr>
<th>Toll-free Telephone Number</th>
<th>Fax Number</th>
<th>E-mail</th>
</tr>
</thead>
<tbody>
<tr>
<td>(877) 283-3352</td>
<td>(364) 616-4401</td>
<td><a href="mailto:FELC@atf.gov">FELC@atf.gov</a></td>
</tr>
</tbody>
</table>

**Change of Address (27 CFR 555.34(a)(1)).** Licensees or permittees may during the term of their current license or permit remove their business or operations to a new location at which they intend regularly to carry on such business or operations. The licensees or permittee is required to give notification of the new location of the business or operations not less than 10 days prior to such removal with the Chief, Federal Explosives Licensing Center. The license or permit will be void for the remainder of the term of the original license or permit. (The Chief, FELC, shall, if the license or permittee is not qualified, refer the request for amended license or permit to the Director of Industry Operations for denial in accordance with § 555.54.)

**Right of Succession (27 CFR 555.39).** (a) Certain persons other than the license or permittee may secure the right to carry on the same explosive materials business or operations at the same address shown on, and for the remainder of the term of, a current license or permit. Such persons are: (1) The surviving spouse or child, or executor, administrator, or other legal representative of a deceased license or permittee; and (2) A receiver or trustee in bankruptcy, or an assignee for benefit of creditors. (b) In order to secure the right provided by this section, the person or persons continuing the business or operations shall furnish the license or permit for that business or operations endorsement of such succession to the Chief, FELC, within 30 days from the date on which the successor begins to carry on the business or operations.

**Federal Explosives License/Permit (FEL) Information Card**

License/Permit Name: USA LAMP & BALLAST RECYCLING INC  
Business Name: CLEANLITES RECYCLING  
License/Permit Number: 4-OH-051-34-2F-01199  
Expiration: June 1, 2022  
Expiration Type: 34-USER OF EXPLOSIVES  
Please Note: Not Valid for the Sale or Other Disposition of Explosives.

(Continued on reverse side)
WARNINGS
1. As provided in Title XI of the Organized Crime Control Act of 1970 (U.S.C. § 842(f)), it is unlawful for any person who (1) is under indictment for, or has been convicted in any court of, a crime punishable by imprisonment for a term exceeding 1 year, (2) is a fugitive from justice, (3) is an unlawful user of, or addicted to any controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802)), (4) has been adjudicated as a mental defective or has been committed to a mental institution, to ship, transport, receive or possess any explosive materials in interstate or foreign commerce, (5) is an alien, other than an alien who is lawfully admitted for permanent residence (as that term is defined in section 101(a)(20) of the Immigration and Nationalization Act), or meets any other exception under section 842(f)(5), (6) has been discharged from the armed forces under dishonorable conditions, or (7) having been a citizen of the United States, has renounced the citizenship of that person.

2. Federal Regulation 27 CFR 555.53 - Licensees and permits issued under this part are not transferable to another person. In the event of the lease, sale, or other transfer of the business or operation covered by the license or permit, the successor must obtain the license or permit required by this part before commencing business or operations.

3. Alteration or Changes to the License or Permit. Alterations or changes in the original license or permit or in duplications thereof violates 18 U.S.C. 1001, an offense punishable by imprisonment for not more than 5 years and/or a fine of not more than $250,000.

NOTICES
1. Any change in trade name or control of this business or operations MUST be reported within 30 days of the change to the Chief, Federal Explosives Licensing Center (FELC), 244 Needy Road, Martinsburg, WV 25405-9431. (27 CFR 555.56-555.57). A licensee or permittee who reports a Change of Control must, upon expiration of the license or permit, file an ATF Form 5400.13/5400.16.

2. Under § 555.46, Renewal of License/Permit, if a license or permittee intends to continue the business or operations described on a license or permit issued under this part during any portion of the ensuing year, the licensee or permittee shall, unless otherwise notified in writing by the Chief, FELC, execute and file with ATF prior to the expiration of the license or permit an application for a license or permit renewal, ATF Form 5400.14/5400.15 Part III, in accordance with the instructions on the form, and the required fee. In the event the licensee or permittee does not timely file an ATF Form 5400.14/5400.15 Part III, the licensee or permittee must file an ATF Form 5400.13/5400.16 as required by § 555.43, and obtain the required license or permit before continuing business or operations. A renewal application will automatically be mailed by ATF to the "mailing address" on the license or permit approximately 30 days prior to the expiration date of the license or permit. If the application is not received 30 days prior to the expiration date, the license or permittee should contact the FELC.

3. This license or permit is conditional upon compliance by you with the Clean Water Act (33 U.S.C. § 1341(a)).

4. THIS LICENSE OR PERMIT MUST BE POSTED AND KEPT AVAILABLE FOR INSPECTION (27 CFR 555.101).

Federal Explosives License (FEL) Customer Service Information
(Continued from front)

Discontinuance of Business (27 CFR 555.61)(27 CFR 555.128). Where an explosives materials business or operations is succeeded by a new licensee or permittee, the records prescribed by this subpart shall appropriately reflect such facts and shall be delivered to the successor, or may be, within 30 days following business discontinuance, delivered to the ATF Out-of-Business Records Center, 244 Needy Road, Martinsburg, WV 25405, or to any ATF office in the division in which the business was located. Where discontinuance of the business is absolute, the records shall be delivered within 30 days following the business discontinuance to the ATF Out-of-Business Records Center, 244 Needy Road, Martinsburg, WV 25405, or to any ATF office in the division in which the business was located.

Explosive materials must be stored in conformance with requirements set forth in 27 CFR, Part 55. It is unlawful for any person to store any explosive materials in a manner not in conformity with these regulations.

TO REPORT LOST OR STOLEN EXPLOSIVES, YOU MUST IMMEDIATELY NOTIFY ATF:
CALL TOLL FREE - (888) ATF-BOMB

Federal Explosives Licensing Center (FELC)
244 Needy Road
Martinsburg, WV 25405-9431

ATF Hotline Numbers
Arson Hotline: 1-888-ATF-FIRE (1-888-283-3473)
Bomb Hotline: 1-888-ATF-DRMB (1-888-283-2662)
Report Illegal Firearms Activity: 1-800-ATF-GUNS (1-800-283-4867)
Firearms Theft Hotline: 1-888-939-9275
Report Stolen, Hijacked or Seized Cigarettes: 1-888-659-6242
Other Criminal Activity: 1-888-ATF-TIPS (1-888-283-8477)