



eDocument Workflow Data Ingestion Form

DERR - Hazardous Waste Permitting

Note: All HW Permitting Documents fall under “Permit-Intermediate” doc type.

Keyword Summary:

Secondary ID:	OHR000109819	Stamped date on doc:	8/29/2017
Facility Name:	USA Lamp & Ballst Recycling, Inc.		
County:	Hamilton	CBI/Trade Secret Info (see protocol below)	
Program:	RCRA C – Hazardous Waste	Request contains CBI/TS claim?	
Permit Type:	Permit to Install & Operate	Was a “public” copy included?	
Permit Subtype:	Application & Support	Financial Assurance Info (see protocol below)	
Permit Classification:	Permit Application	Request contains FA policy/account # info?	
Permit Purpose:	Renewal	Contingency Plan Info (see protocol below)	
Confidentiality Status:	Public Record for Publication	Request contains facility staff pers/home phone #'s?	

CBI/Trade Secret Protocol

Applications or requests that contain a claim of Confidential Business Information (CBI) or “trade secret” **are not be ingested** into the Agency’s eDoc system. However, any claims must be made at the time of application submission, as required by both OAC rule 3745-49-03 and OAC rule 3745-50-30. Permittees must comply with the complete requirements of the above-cited rules, which include, among other things, submission of a corresponding “public” copy of the application or request which should be ingested into eDocs.

Financial Assurance Info Protocol

If the application contains “original signature” financial assurance documents, these documents **must be forwarded** to CO FA staff (Shawn Sellers or Melissa Cheung) as these types of documents must be secured in CO’s fireproof file cabinet. Also, even if the FA information included in a mod application is not “original signature”, if it includes information like insurance policy, bank account, letter of credit or bond numbers, these impacted pages should simply be physically removed and not scanned/included as a part of the ingested application. In place of the removed page, a page can be inserted which states: “Pages of this application which contain financial assurance mechanism details specific to policy or account numbers have been removed from this web-available version of the document.”

Regarding review of FA components of mods, ERAS has set up a [tracking/request system](#) on SharePoint where DO staff can make a review request the HW FA Review Request list which can be accessed from the DMWM’s Financial Assurance site.

Contingency Plan Info Protocol

If the application contains facility staff personal/home phone number information, the impacted pages should simply be physically removed and not scanned/included as a part of the ingested application. In place of the removed page, a page can be inserted which states: “Pages of this application which contain facility staff personal/home phone number information have been removed from this web-available version of the document.”

Form Completed by: Willoughby

9/5/2017

Comments



CLEANLITES
RECYCLING

CLEANLITES RECYCLING, INC

7806 Anthony Wayne Ave, Cincinnati, OH 45216
(P) 513.641.4155 | (F) 517.641.4158
usasales@cleanlites.com www.cleanlites.com

August 28, 2017

Mr. Randall Kirkland
Ohio EPA
401 East Fifth Street
Dayton, OH 45402

RE: USA Lamp & Ballast Recycling, Inc (OHR-000-109-819)
Part B Permit Renewal Application

Dear Mr. Kirkland:

Please find enclosed two (2) copies of the Part B Hazardous Waste Permit Renewal Application for USA Lamp & Ballast Recycling, Inc. (OHR-000-109-819).

If you have any questions or comments, please contact me.

Respectfully submitted,

Thomas M. Kimmel
President, USA Lamp & Ballast Recycling, Inc./
Cleanlites Recycling
Email – tom@cleanlites.com
Cell Phone – 517.719.1895

cc: David G. Dempsey, P.E. – EH&S Manager
Timothy Kimmel – Cincinnati, OH
Kathy Mohar – Mason, MI

Enclosures:

RECEIVED
OH EPA

AUG 29 2017
pm

Southwest District



Ohio AW Office

7806 Anthony Wayne Ave. Cincinnati, OH 45216
p. (513) 641-4155 | usasales@cleanlites.com

PART B PERMIT RENEWAL APPLICATION

August 28 2017

RECEIVED
OHIO EPA
AUG 29 2017

Southwest

USA LAMP & BALLAST RECYCLING, INC

EPA ID OHR-000-109-819

7806 Anthony Wayne Avenue
Cincinnati, OH 45216

Part B Permit Renewal Application

August 28 2017

USA Lamp & Ballast Recycling, Inc.
7806 Anthony Wayne Avenue
Cincinnati, OH 45216

EPA ID OHR-000-109-819

Certification 1

Part A 2

Part B – Subsection B
Facility Description 3

Part B – Subsection C
Waste Characteristics 4

Part B – Subsection D 5
Container Storage & Containment Building

Part B – Subsection E 6
Omitted

Part B – Subsection F 7
Procedures to Prevent Hazards

Part B – Subsection G 8
Contingency Plan General Information

Part B – Subsection H 9
Personnel Training

Part B – Subsection I 10
Closure Plan

Part B – Subsection J 11
Corrective Action Plan

12

**USA Lamp & Ballast Recycling, Inc - Part B Permit
Renewal
CERTIFICATION**

Part B Permit Renewal Application Certification Required By OAC 3745-50-42

"I certify under the 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, 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 fine and imprisonment for knowing violations."



Signature

Thomas M Kimmel, President
Printed Name and Title

8. 29. 17
Date



Ohio AW Office
7806 Anthony Wayne Ave. Cincinnati, OH 45216
p. (513) 641-4155 | usasales@cleanlites.com

PART A PERMIT RENEWAL APPLICATION

August 28 2017

USA LAMP & BALLAST RECYCLING, INC

EPA ID OHR-000-109-819

7806 Anthony Wayne Avenue
Cincinnati, OH 45216

MAIL THE COMPLETED FORM TO: Ohio EPA, DMWM, P.O. Box 1049, Columbus, OH 43216-1049	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION	For Ohio EPA Use Only
1. Reason for Submittal	Reason for Submittal: <input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). <input type="checkbox"/> To provide subsequent notification (to update site identification information). <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application. <input checked="" type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # <u>1</u>) <input type="checkbox"/> As a component of the Hazardous Waste Report for the year _____	
2. Site EPA ID No.	EPA ID Number: OHR-000-109-819	
3. Site Name	Name: USA Lamp & Ballast Recycling, Inc.	
4. Site Location Information	Street Address: 7806 Anthony Wayne Avenue	
	City, Town, or Village: Cincinnati	County: Hamilton
	State: OH	Country: US
	Zip Code: 45216	
5. Site Land Type	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
6. North American Industry Class. System (NAICS) Code(s) for the Site	A. (Primary) 56200	B. 33511
	C.	D.
7. Site Contact Person:	First Name: Benny	
	Title: EHS Manager	
	Street or P.O. Box: 7806 Anthony Wayne Avenue	
	City, Town or Village: Cincinnati	
	State: OH	Country: US
	Zip Code: 45216	
	E-mail: benny.coyt@cleanlites.com	
	Phone & Ext.: 513-766-0318	
	Fax: 513.641.4156	
	8. Legal Owner and Operator of the Site	A. Name of Site's Legal Owner: USA Lamp & Ballast Recycling, Inc.
Date Became Owner (mm/dd/yyyy): / / 06/30/2004		
Owner Type: <input type="checkbox"/> Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
Street or P.O. Box: 7806 Anthony Wayne Avenue		
City, Town, or Village: Cincinnati		Phone: 513.641.4155
State: OH		Country: US
Zip Code: 45216		
B. Name of Site's Operator: USA Lamp & Ballast Recycling, Inc.		
Date Became Operator (mm/dd/yyyy): / / 06/30/2002		
Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
Additional Owners and/or Operators should be listed in the Comment Section or on another copy of this form page.	Street or P.O. Box: 7806 Anthony Wayne Avenue	
	City, Town, or Village: Cincinnati	Phone: 513.641.4155
	State: OH	Country: US
	Zip Code: 45216	

9. Type of Regulated Waste Activity (Mark "X" in the appropriate boxes.)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste

(choose only one of the following three categories or leave blank if not applicable)

- ☒ a. **Large Quantity Generator (LQG):**
Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste; or
- ☐ b. **Small Quantity Generator (SQG)**
100 to 1,000 kg/mo (220-2,200 lbs.) of non-acute hazardous waste; or
- ☐ c. **Conditionally Exempt Small Quantity Generator (CESQG):**
Less than 100 kg/mo of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

- ☐ d. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.
- ☐ e. United States Importer of Hazardous Waste
- ☐ f. Mixed Waste (hazardous and radioactive) Generator

2. Hazardous Waste Report Generator Status

(choose one if a Reason for Submittal is the Hazardous Waste Report)

- ☐ a. **Large Quantity Generator (LQG):**
Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste was generated at the site in any one month. or
- ☐ b. **Small Quantity Generator (SQG)**
In one or more months the site generated greater than 100kg (220 lbs) but in no month did it generate more than 1,000 kg/mo (220-2,200 lbs) of non-acute hazardous waste, or
- ☐ c. **Conditionally Exempt Small Quantity Generator (CESQG):**
The site generated no more than 100 kg (220 lbs) of non-acute hazardous waste in any one month.
- ☐ d. **Non-Generator**
The site did not generate any hazardous waste during the calendar year.

For Items 3 through 7, check all that apply:

3. Transporter of Hazardous Waste

- ☒ a. Transporter
- ☒ b. Transfer Facility (at your site)

- ☒ 4. **Treater, Storer or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.

- ☒ 5. **Recycler of Hazardous Waste (at your site)** Note: A hazardous waste permit may be required for this activity.

- ☐ a. 72-hour Recycler

6. Exempt Boiler and/or Industrial Furnace

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting and Refining Furnace Exemption

- ☐ 7. **Underground Injection Control**

- ☒ 8. **Receives Hazardous Waste from Off-site**

B. Universal Waste Activities

- ☐ 1. **Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more). Indicate types of universal waste managed at your site. (check all boxes that apply):**

- | | <u>Managed</u> |
|---------------------------------|-------------------------------------|
| a. Batteries | <input checked="" type="checkbox"/> |
| b. Pesticides | <input type="checkbox"/> |
| c. Mercury Containing Equipment | <input checked="" type="checkbox"/> |
| d. Lamps | <input checked="" type="checkbox"/> |

- ☒ 2. **Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

1. Used Oil Transporter

Indicate Type(s) of Activity(ies)

- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)

2. Used Oil Processor and/or Re-refiner

Indicate Type(s) of Activity(ies)

- ☐ a. Processor
- ☐ b. Re-refiner

- ☐ 3. **Off-Specification Used Oil Burner**

4. Used Oil Fuel Marketer -

Indicate Type(s) of Activity(ies)

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Eligible Academic Entities with Laboratories – Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to OAC rules 3745-52-200 through 3745-52-216

- ☐ 1. Opting into or currently operating under OAC rules 3745-52-200 through 3745-52-216 for the management of hazardous wastes in laboratories. **Mark all that apply:**
- ☐ a. College or University
- ☐ b. Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university
- ☐ 2. Withdrawing from OAC rules 3745-52-200 through 3745-53-216 for the management of hazardous waste in laboratories


10. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed.


D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	U151		

11. Comments

USA Lamp & Ballast Recycling, Inc. is a destination facility for Universal Waste Lamps, mercury containing items, electronic waste, and batteries. Lamps are crushed and separated by material type then recycled through other facilities. Electronic wastes are disassembled and recycled to other facilities. Mercury from the lamp process and all other mercury containing materials is recycled at this facility. All residuals and debris from the mercury recycling process is recycled through other facilities.

12. Certification. 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, 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 fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm-dd-yyyy)
	Thomas M. Kimmel, President & CEO	8.29.17

<p align="center">United States Environmental Protection Agency</p> <p align="center">HAZARDOUS WASTE PERMIT PART A FORM</p>	
--	---

1. Facility Permit Contact

First Name	Timothy	MI	M	Last Name	Kimmel
Title	VP, Sales & Marketing				
Email	timothy.kimmel@cleanlites.com				
Phone	513.641.4155	Ext		Fax	513.641.4156

2. Facility Permit Contact Mailing Address

Street Address	7806 Anthony Wayne Avenue	
City, Town, or Village	Cincinnati	
State	OH	Country USA Zip Code 45216

3. Facility Existence Date (mm/dd/yyyy)

6/30/2002

Other Environmental Permits

A. Permit Type	B. Permit Number												C. Description
E	P	0	1	0	8	5	6	7					PTI & PTO Fluorescent Lamp Processor

5. Nature of Business

<p>USA Lamp & Ballast Recycling, Inc. is a destination facility for Universal Waste lamps, mercury containing items, electronic waste, and batteries. Lamps are crushed and separated by material type, then recycled through other facilities. Electronic wastes are disassembled and recycled to other facilities. Mercury from mercury containing materials is recycled at this facility. All residuals and debris from the mercury recycling process are recycled through other facilities.</p>

6. Process Codes and Design Capacities

Line Number		A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		
0	1	S	0	1	150	Y	001	Lamp Storage(325,000 lb)

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line No.		A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										
								(1) Process Codes							(2) Process Description (if code is not entered in 7.D1))			
0	1	D	0	0	8	14,714	T	S	0	1								
0	2	D	0	0	6													Included with above
0	3	D	0	0	9													Included with above
0	4	D	0	1	1													Included with above
0	5	D	0	0	1													Included with above
0	6	D	0	0	2													Included with above
0	7	D	0	0	3													Included with above
0	8	D	0	0	4													Included with above
0	9	D	0	0	5													Included with above
1	0	D	0	0	7													Included with above
1	1	D	0	1	0													Included with above

8. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

9. Facility Drawing

All existing facilities must include a scale drawing of the facility. See instructions for more detail.

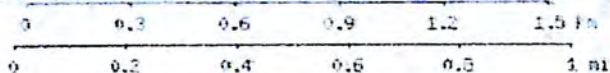
10. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. See instructions for more detail.

11. Comments

Section 7: 012 U151 Included with above

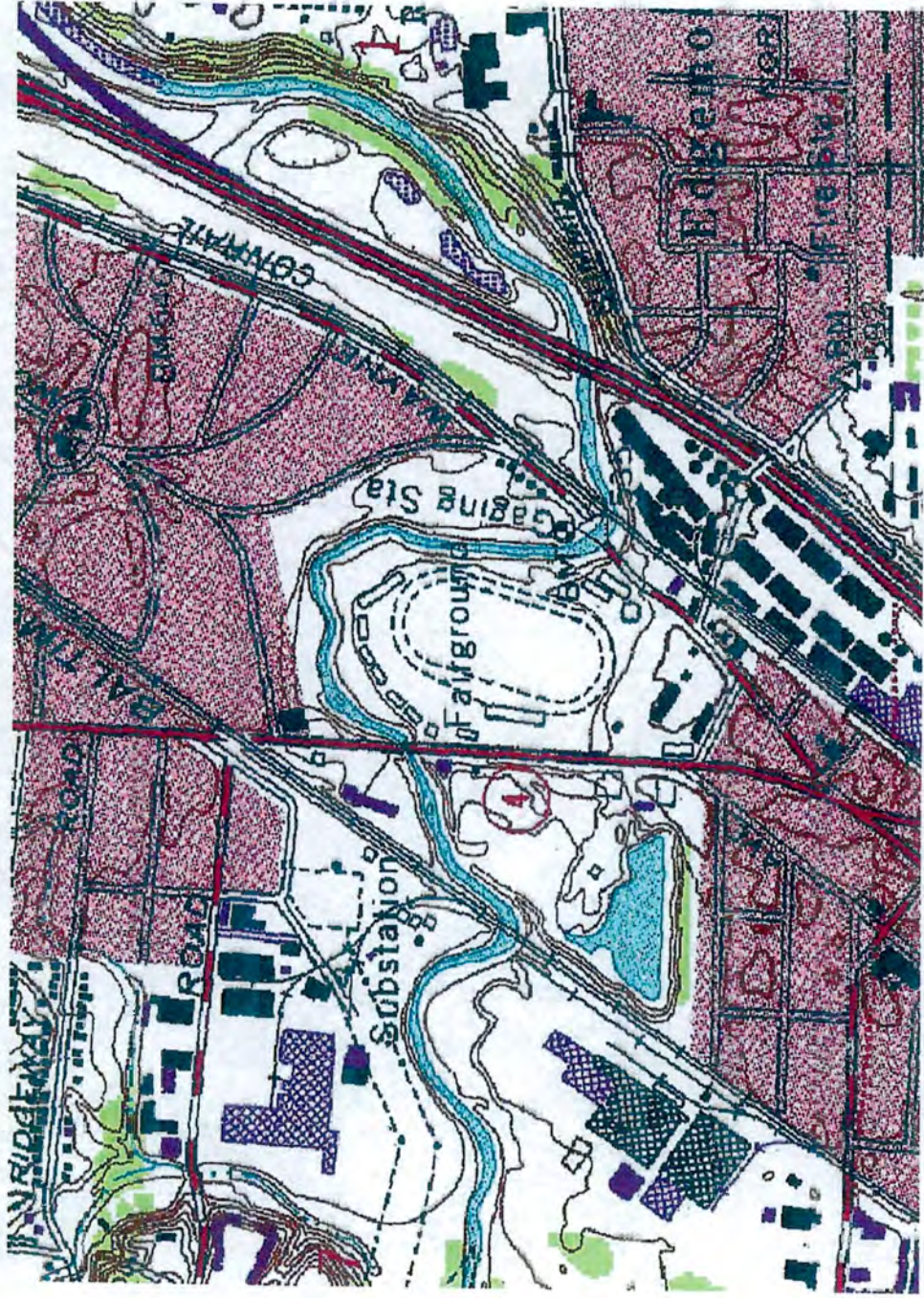
Maps



Cincinnati East quadrangle

Projection is UTM Zone 16 NAD83 Datum

Topographic Map



**Topographic Map
(Enlarged)**

Flood Insights test results for:
7806 ANTHONY WAYNE AVE, CINCINNATI, OH 45216
 Geocoding Accuracy: S5 Matched to Street Address (Best)

Flood Zone Determinations

SFHA (Flood Zone)	Within 250 feet of multiple flood zones?			
Out	No			
Community	Community Name	Zone	Panel	Panel Date
390210	CINCINNATI, CITY OF	X	0203D	May 17, 2004
FIPS	Census Tract			
39061	0061.00			



FloodMap Legend

Flood Zones:

- Areas inundated by 500-year flooding
- Areas outside of the 100- and 500-year floodplains
- Areas inundated by 100-year flooding
- Areas inundated by 100-year flooding with velocity hazard
- Floodway areas
- Floodway areas with velocity hazard
- Areas of undetermined but possible flood hazards
- Areas not mapped on any published FIR

Flood Zone Map

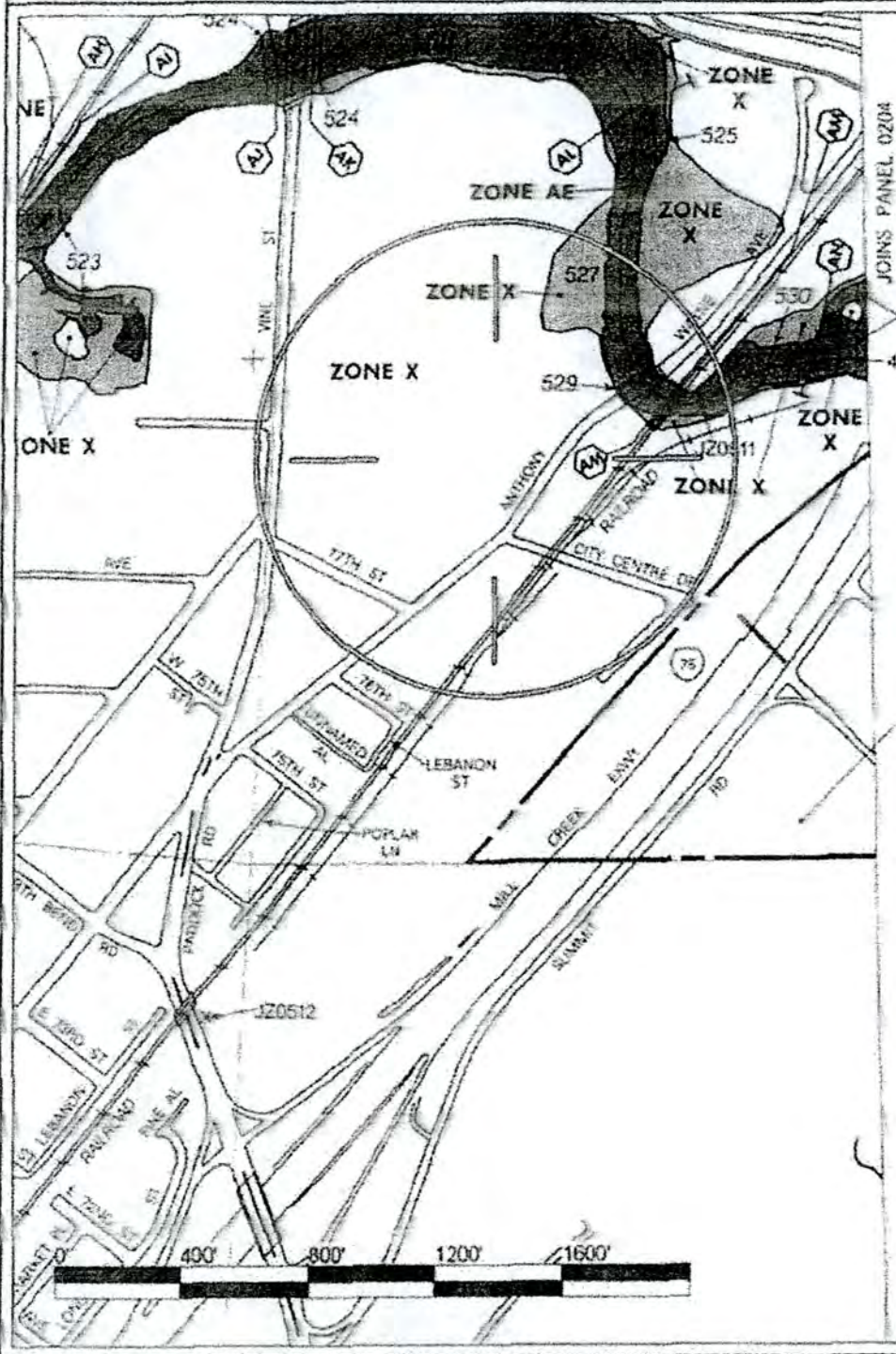
InterFlood



www.interflood.com • 1-800-252-6633

Prepared for:
Socol Appraisal Service

7806 Anthony Wayne Avenue
Cincinnati, OH 45216



FLOODSCAPE

Flood Hazards Map

Map Number
39061C02030

Effective Date
May 17, 2004

For more information about
flood zones and flood
insurance, contact:

Powered by FloodSource
877.77.FLOOD
www.floodsource.com

© 1999-2002 FloodSource Corp. U.S. Patents Pending. All rights reserved. For more information, please e-mail info@floodsource.com.

Flood Zone Map (Enlarged)

Figures

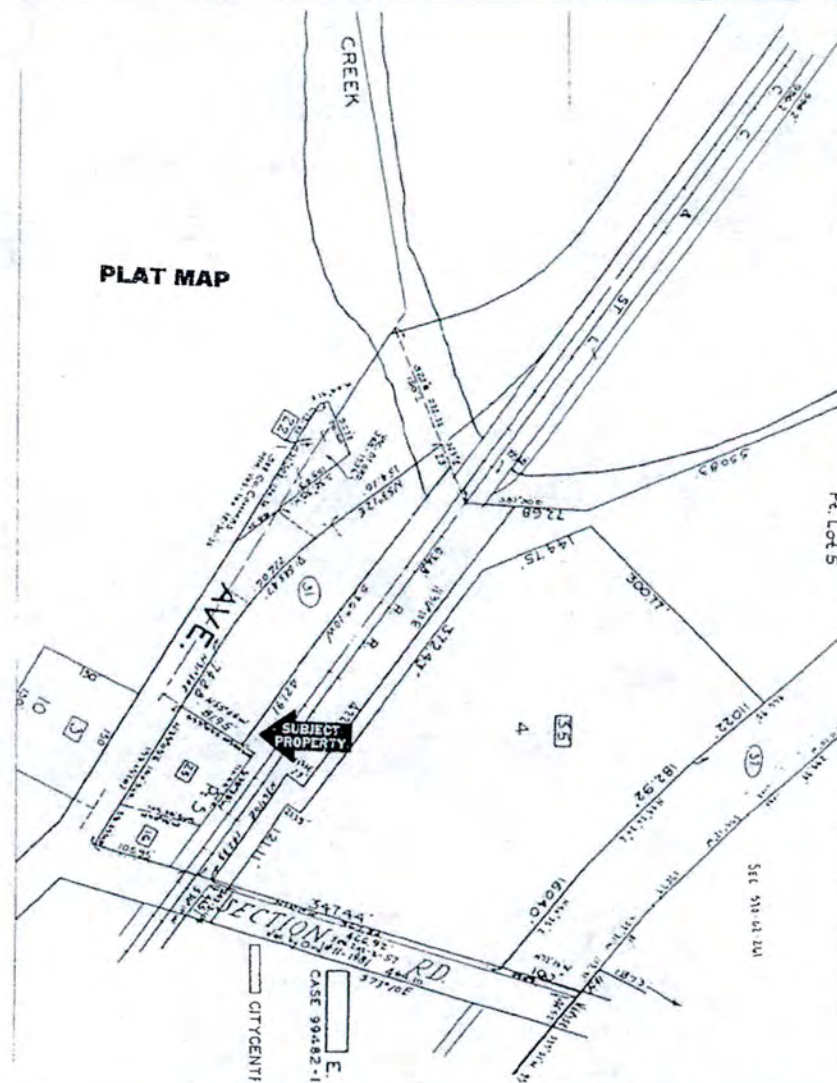


FIGURE 6 - LEGAL BOUNDARIES

USA LAMP & BALLAST RECYCLING, INC
7806 ANTHONY WAYNE AVENUE
CINCINNATI, OH

PROJECT NO: 0509020P
DATE: 9/29/2005
SCALE: NTS
DRAWN BY: SP

Delta
Environmental
Consultants, Inc.
8008 Corporate Center Drive, Suite 100
Charlotte, North Carolina 28226

Figure 1



Basis of Bearings:

GPS Observations made on November 10th, 2008 and the Ohio State Plane Coordinate System, Ohio zone South 3402 using the Hamilton County Geodetic Control Stations

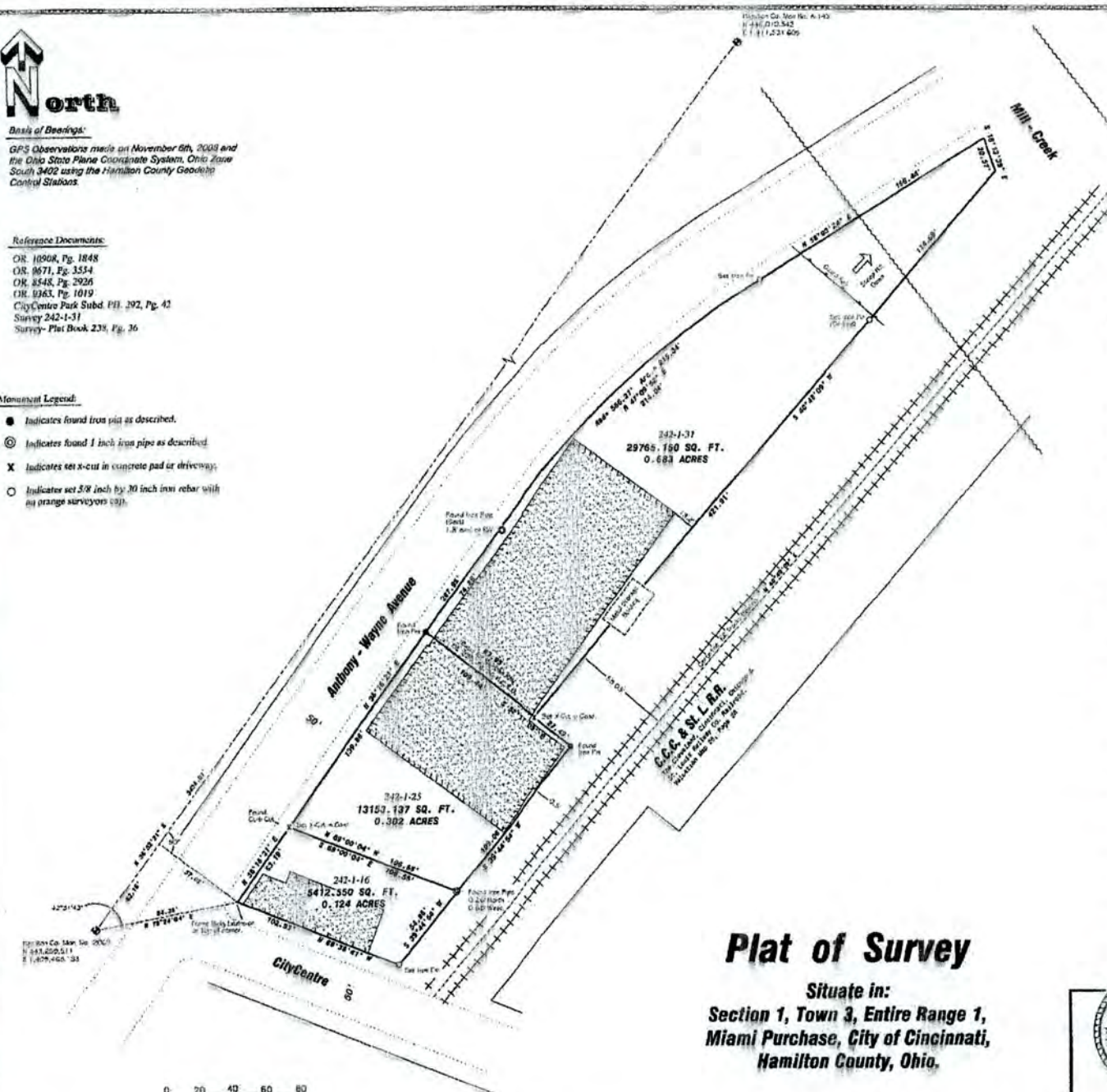
Reference Documents:

OR 1050R, Pg. 1848
OR 9671, Pg. 3554
OR 8548, Pg. 2926
OR 1063, Pg. 1019
CityCentre Park Subd. Pl. 392, Pg. 42
Survey 242-1-31
Survey- Plat Book 235, Pg. 26

Monument Legend:

- Indicates found iron pin as described.
- ⊙ Indicates found 1 inch iron pipe as described.
- X Indicates set x-cut in concrete pad or driveway.
- Indicates set 3/8 inch by 20 inch iron rebar with orange surveyors cap.

Tax Book 242, Page 1, Parcels 16, 25, 31



Tax Parcel No. 242-1-31 Closure

PNTNO	BEARING	DISTANCE	NORTHING	EASTING
502			443430.68	1409665.27
	N 36°16'21" E 74.88			
503			443491.04	1409709.57
	RADIUS: 566.37 CHORD: 214.04 DEGREE: 10°06'59"			
	LENGTH: 218.34 DELTA: 21°47'03" TANGENT: 108.98			
	CHORD BRG: N 47°09'52" E			
	RADIUS PNTNO: 511 N: 443155.97 E: 1410166.18			
504			443636.57	1409866.53
	N 50°03'24" E 156.44			
505			443729.34	1409999.28
	S 18°13'39" E 20.57			
506			443699.80	1410005.71
	S 40°48'09" W 421.81			
507			443380.43	1409730.01
	N 52°11'09" W 81.95			
502			443430.68	1409665.27

Area: 29765.150 S.F., 0.683 Acres

Tax Parcel No. 242-1-25 Closure

PNTNO	BEARING	DISTANCE	NORTHING	EASTING
501			443317.91	1409582.52
	N 36°16'21" E 139.88			
502			443430.68	1409665.27
	S 52°11'09" E 109.44			
508			443363.58	1409751.73
	S 39°44'54" W 109.06			
509			443279.72	1409681.99
	N 69°00'04" N 106.55			
501			443317.91	1409582.52

Area: 13153.137 S.F., 0.302 Acres

Tax Parcel No. 242-1-16 Closure

PNTNO	BEARING	DISTANCE	NORTHING	EASTING
500			443275.03	1409551.05
	N 36°16'21" E 53.19			
501			443317.91	1409582.52
	S 69°00'04" E 106.55			
509			443279.72	1409681.99
	S 39°44'54" W 54.86			
510			443237.54	1409646.91
	N 68°38'41" W 102.93			
500			443275.03	1409551.05

Area: 5412.850 S.F., 0.124 Acres

Date: November 10th, 2008

Plat of Survey
Situate in:
Section 1, Town 3, Entire Range 1,
Miami Purchase, City of Cincinnati,
Hamilton County, Ohio.

FIGURE 2, Page 000045



PROFESSIONAL SURVEYING SERVICES, INC.

LAND SURVEYORS - PLLOTS - LAND PLANNERS
OHIO - KENTUCKY - TENNESSEE

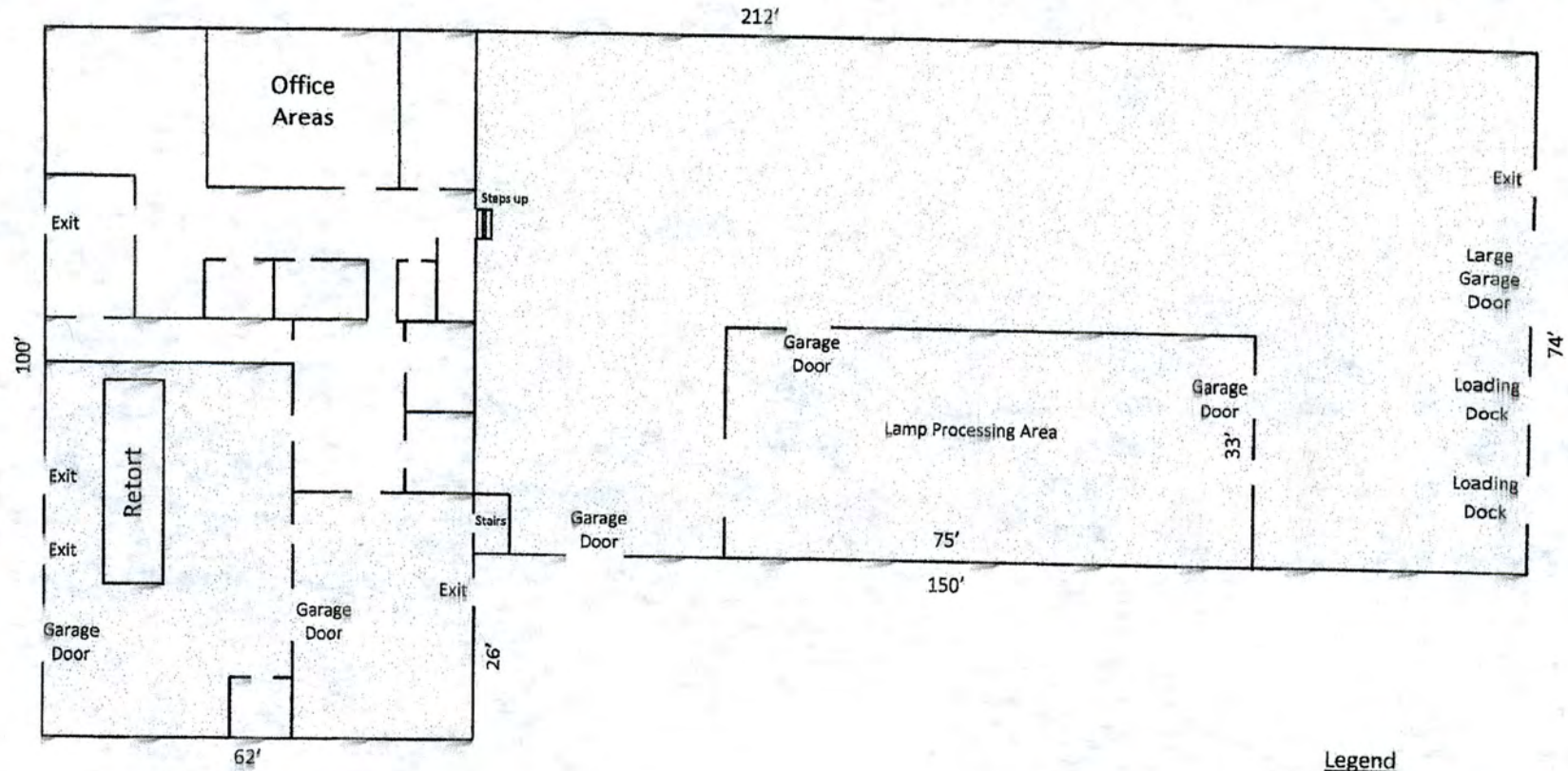
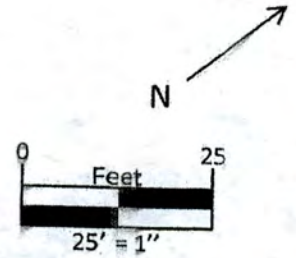
6036 Culley Avenue
Cincinnati, Ohio 45236-1717
www.pss-nh.com

Telephone: (513) 232-6039

Kenneth E. Lankester P.S. S-7327 Ohio.



USA Lamp & Ballast Recycling, Inc.
7806 Anthony Wayne Avenue
Cincinnati, OH 45216
513-641-4155
EPA OHR 000 109 819



Legend



FIGURE 3
Facility Layout
Pg. 000046

Photographs



Aerial Photograph

Photographs



Photo 01 – Front of Building, Office Area



Photo 02 – Front of Building, Manufacturing Area

Photographs taken on July 13, 2017

Photographs



Photo 03 – Side of Building facing Anthony Wayne Avenue, Office Area



Photo 04 – Side of Building facing Anthony Wayne Avenue, Manufacturing Area

Photographs taken on July 13, 2017

Photographs



Photo 05 – Rear of Building, Loading Dock Area



Photo 06 – Side of Building railroad tracks, Empty Drum Storage

Photographs taken on July 13, 2017

Photographs



Photo 07 – Inside Staging Area, Loading Dock Area



Photo 08 – Storage Area 1, Lamp Storage Area

Photographs taken on July 13, 2017

Photographs



Photo 09 – Storage Area 1, Lamp Storage Area continued



Photo 10 – Storage Area 1, Lamp Storage Area continued

Photographs taken on July 13, 2017

Photographs



Photo 11 – Storage Area 2, Battery and Ballast Storage Area and Cardboard Bailer



Photo 12 – Storage Area 2, Battery and Ballast Storage Area

Photographs taken on July 13, 2017

Photographs

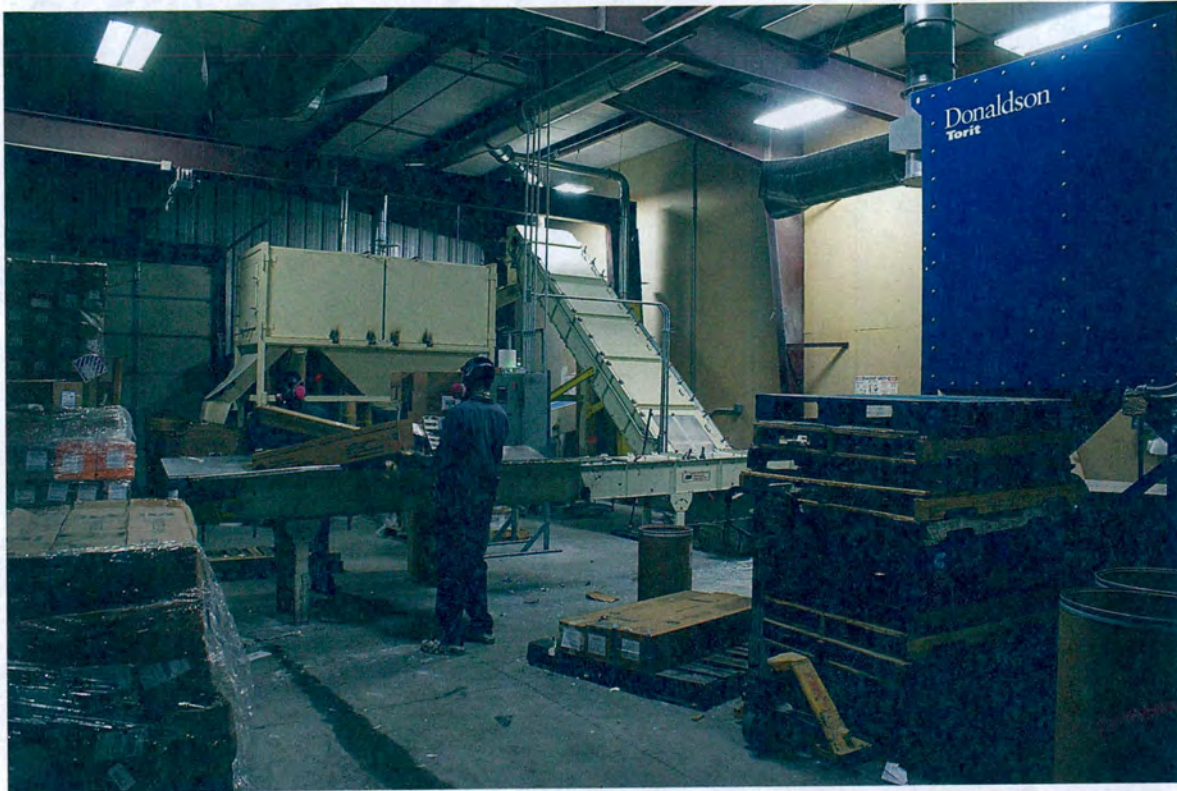


Photo 13 – Lamp Machine



Photo 14 – Lamp Machine Filter and Carbon Column

Photographs taken on July 13, 2017

Photographs



Photo 15 – Lamp Powder Recovery System



Photo 16 – Glass Separator System

Photographs taken on July 13, 2017

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section B Facility Description

B-1: GENERAL DESCRIPTION OAC 3745-50-44 (A) (1)

This section provides a general description of the Hazardous Waste Management (HWM) facility as required by OAC3745-50-44 and 40 CFR 270.14(b)(1). This description is intended to acquaint the permit application reviewer with an overview of the facility. More complete details can be found in other parts of this permit application.

USA Lamp & Ballast Recycling, Inc is located within the Cincinnati, OH city limits in the area known as Carthage. The street and mailing address are:

USA Lamp & Ballast Recycling, Inc
7806 Anthony Wayne Avenue
Cincinnati, OH 45216

USA Lamp & Ballast Recycling, Inc. acts a destination facility for Universal Waste lamps. The lamps are accepted for storage prior to being recycled at this facility. Crushed and broken lamps and mercury containing debris/residuals were also accepted at this facility as characteristic by-products/residuals to be recycled. The residuals are generated during the bulb recycling processes at other facilities, and the debris results from cleanup of broken bulbs at other facilities.

USA Lamp & Ballast Recycling, Inc acts as a Universal Waste Handler for batteries and mercury containing thermostats. These wastes are accepted and then disassembled and/or repackaged to be sent to the final destination facilities.

Other mercury containing devices and computer/electronic equipment continue to be accepted at this facility as characteristic by-products and scrap metal to be recycled. These items are manually separated into their constituent parts. The mercury is reclaimed utilizing the on-site mercury retort. Other materials are sent on to final destination facilities to be recycled.

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section B Facility Description

Universal wastes are transported from the generator to this facility for processing and/or storage. Transportation for USA Lamp & Ballast Recycling, Inc is handled by properly licensed transporters.

The facility consists of two connected structures of approximately 18,133 square feet on approximately 1.00 acre of land located in a ML (Manufacturing Limited) zone.

The contacts and responsible parties for this facility are as follows:

Timothy M. Kimmel
VP, Facility Manager
513.641.4155 / timothy.kimmel@usalamp.com

Benny Coyt
EHS Manager
513.766.0318 / benny.coyt@cleanlites.com

Kyle Amann
Operations Manager
513.641.4155 / usalamp@usalamp.com email

B-2a: TRAFFIC INFORMATION OAC 3745-50-44 (A)(10)

B-2a (1) Traffic patterns on-site:

Figure B-1 in this section shows movement of Waste Material to the facility from the nearest major highway and the traffic control signals encountered along the route. Figure B-2 shows an overview of the facility location.

Access from Interstate 75 at Exit 9 OH-4 / Paddock Road / Seymour Avenue, turn North (Left if coming from the South or Right if coming from the North) onto Paddock Road. Proceed approximately .4 miles to Anthony Wayne Avenue. Bear Right onto Anthony Wayne Avenue; facility entrance is at 7806 Anthony Wayne Avenue on the east side of the road; approximately .3 miles from the intersection of Paddock Road and Anthony Wayne Avenue.

B-2a (2) Estimated volume (e.g. number and types of vehicles):

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section B Facility Description

The estimated volume of universal waste traffic for the USA Lamp & Ballast Recycling facility is as follows: Straight trucks (Van) entering and leaving the facility two (2) to three (3) times daily. Tractor trailers entering and leaving the facility two (2) to three (3) times daily.

B-2a (3) Traffic Control (e.g. turns across traffic lanes, procedures):

Access to the facility building is through a walk in door to the office area, a walk door and a 14' x 14' overhead drive-in door and two (2) docks in the loading and unloading area. The doors in the loading and unloading area exit to the North end of the building. The overhead doors are open when trucks are entering or leaving the facility, at other times access through this opening is monitored by employees. There are also garage doors on the East and South sides of the building which are locked unless needed to access building. All doors are securely locked and security system is armed when the plant is closed.

Truck traffic by transporters will be scheduled between 8:00am – 4:00pm, Monday through Friday. This restriction may be waived at the facility manager's discretion if the transporter is unable to conform to the schedule in the event of an emergency or scheduling conflict.

If necessary, facility employees will assist with traffic control on Anthony Wayne when trucks are backing in or out of the facility grounds.

B-2a (4) Access Road Surfacing:

All access roads are constructed of concrete or bituminous pavement (blacktop) and are maintained by the City of Cincinnati.

B-2a (5) Access load-bearing capacity:

The roads are capable of bearing the legal load weights of all vehicles.

B-2a (6) Traffic control signals:

There is a traffic signal at the intersection of Paddock Road and Anthony Wayne Avenue and traffic signals at the entrances to Northbound and Southbound I-75 from Paddock Road.

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section B Facility Description

B-2b: SEISMIC CONSIDERATIONS OAC 3745-54-18(A)

The State of Ohio is not listed in Appendix VI of 40 CFR 264 on the list of political jurisdictions with which compliance with this standard must be demonstrated. Therefore this information is not required.

B-2c: FLOOD-PLAIN INFORMATION OAC 3745-50-44(A)(11), OAC 3745-54-18(B)

The USA Lamp & Ballast Recycling, Inc facility is located outside the 100 year floodplain. Please See Figure 4

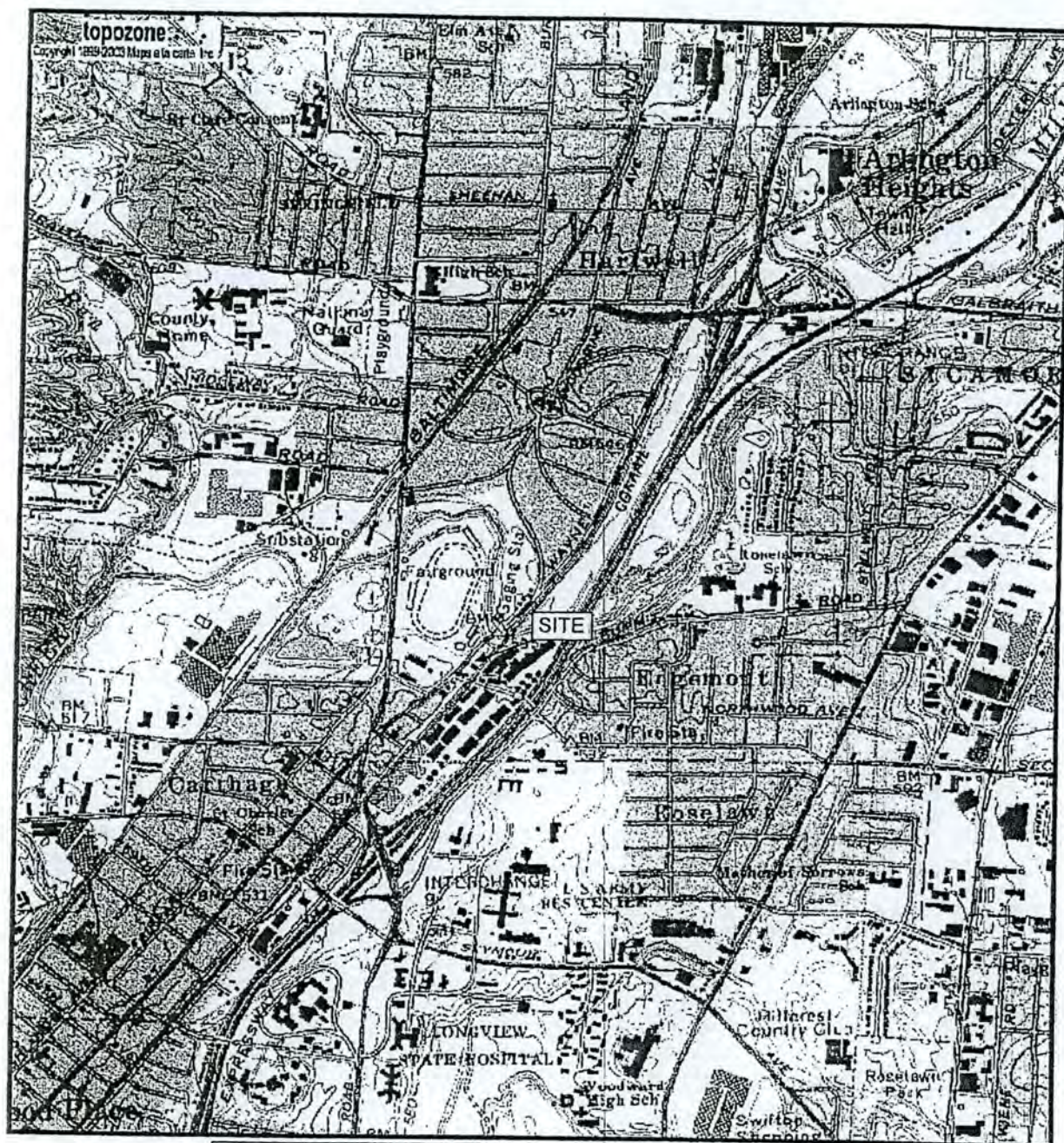
B-3: CERTAIN WASTE PLACEMENT PROHIBITIONS OAC 3745-54-18(C)

USA Lamp & Ballast Recycling, Inc will not place any non-containerized or bulk liquid hazardous waste in any salt dome formation, salt bed formation, underground mine, or cave. We are aware this type of waste is prohibited.

B-4: TOPOGRAPHIC MAP OAC 3745-50-44(A)(19)

Requirements

1. Shows a distance of one thousand feet around the facility
2. Has a scale of one inch to not more than 200 feet
3. Has contours appropriate to the relief at the facility
4. Has contours that are sufficient to clearly show the pattern of surface water flow in the vicinity of and from each operational unit at the facility
5. Shows map scale and date
6. Shows the one hundred year floodplain area
7. Shows surface water bodies in the immediate area
8. Shows surrounding land uses
9. Includes a wind rose
10. Has a north arrow
11. Shows the legal boundaries of the facility
12. Shows access control
13. Shows injection and withdrawal wells both on-site and off-site.
 - a. N/A
14. Shows buildings, treatment, storage or disposal operations
15. Shows other structures (e.g. recreation areas, run-off control systems, sewers, loading areas, access and internal roads, fire control facilities, etc)
16. Shows barriers for drainage or flood control?
17. Shows location of operational units for treatment, storage or disposal of hazardous waste.



Map center is UTM 16 718510E 4342384N (WGS84/NAD83)
Cincinnati East quadrangle
 Projection is UTM Zone 16 NAD83 Datum

OHIO EPA DHWM

M=-5.183
 G=1.601

MAY 17 2007

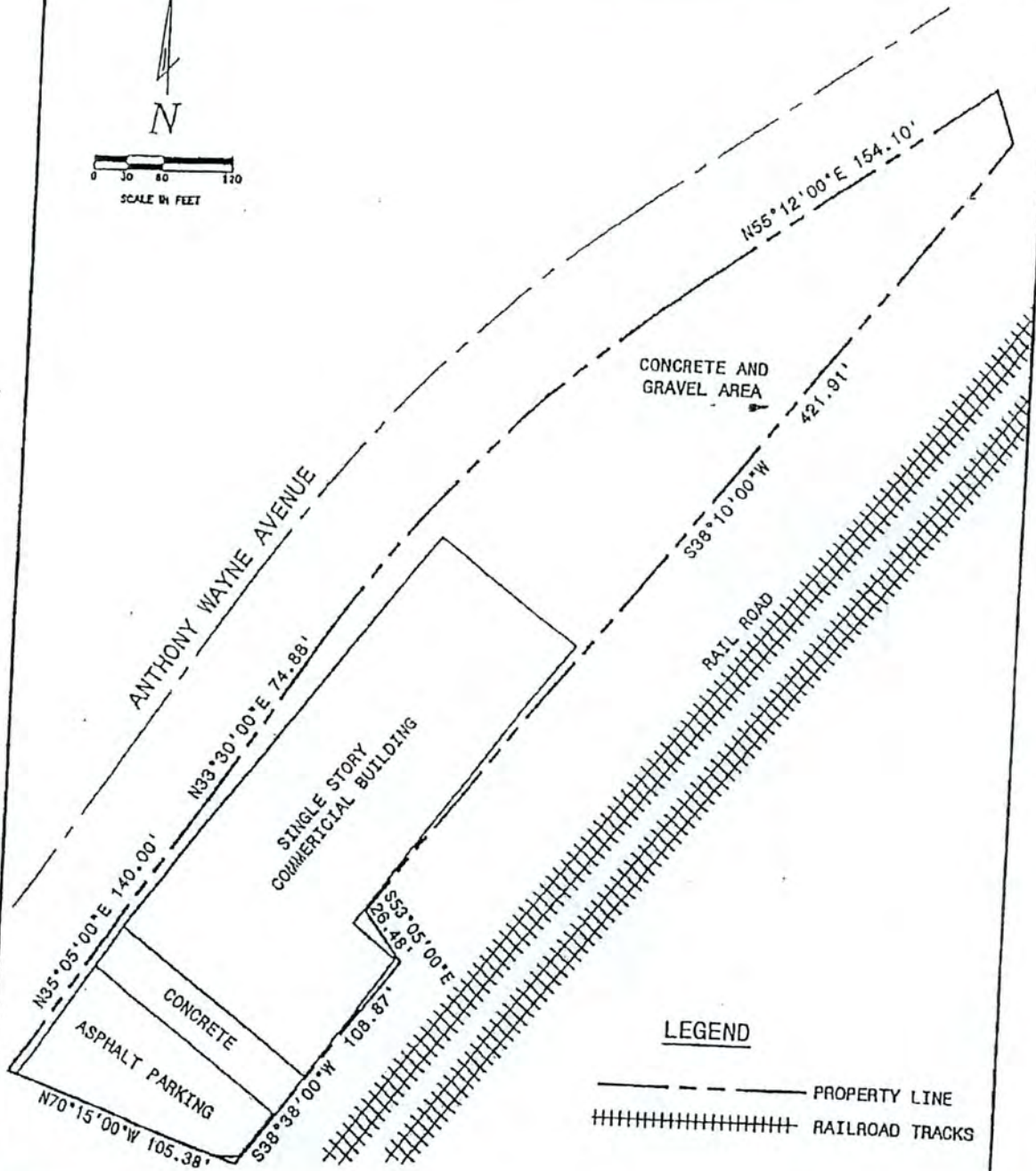
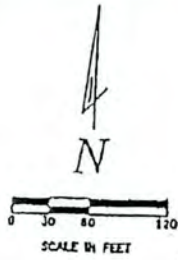
000055

FIGURE 1 - SITE LOCATION MAP

USA LAMP & BALLAST
 7808 ANTHONY WAYNE AVE
 CINCINNATI, OH

PROJECT NO: 0509-020-P
 DATE: 9/29/2005
 SCALE:
 DRAWN BY: AZ

Delta
 Environmental
 Consultants, Inc.
 8008 Corporate Center Drive, Suite 100
 Charlotte, North Carolina 28226



LEGEND

----- PROPERTY LINE

+++++ RAILROAD TRACKS



Delta
Environmental
Consultants, Inc.

Solving environment-related business problems worldwide

8008 Corporate Center Drive • Suite 100 704.511.9890 800.477.7411
Charlotte, North Carolina 28226 USA Fax 704.543.4035

PART A PERMIT SUBMITTAL
USA LAMP & BALLAST RECYCLING INC.

FIGURE 2 SITE PLAN

7808 ANTHONY WAYNE AVENUE
CITY OF CINCINNATI, HAMILTON COUNTY, OHIO

SUBMITTAL DATE: DECEMBER 2004
PLOT DATE: 12/20/04

OHIO EPA DHWM

000057

MAY 17 2007

Flood Insights test results for:
7806 ANTHONY WAYNE AVE, CINCINNATI, OH 45216
 Geocoding Accuracy: S5 Matched to Street Address (Best)

Flood Zone Determinations

SFMA (Flood Zone)	Within 250 feet of multiple flood zones?			
Out	No			
Community	Community Name	Zone	Panel	Panel Date
390210	CINCINNATI, CITY OF	X	0203D	May 17, 2004
FIPS	Census Tract			
39061	0061.00			



FloodMap Legend

Flood Zones

- Areas inundated by 500-year flooding
- Areas outside of the 100- and 600-year floodplains
- Areas inundated by 100-year flooding
- Areas inundated by 100-year flooding with velocity hazard
- Floodway areas
- Floodway areas with velocity hazard
- Areas of undetermined but possible flood hazard
- Areas not mapped on any published FIRM

OHIO EPA DHWM

MAY 17 2007

000059

FIGURE 4 - FLOODPLAIN

USA LAMP & BALLAST RECYCLING, INC
 7806 ANTHONY WAYNE AVE
 CINCINNATI, OH

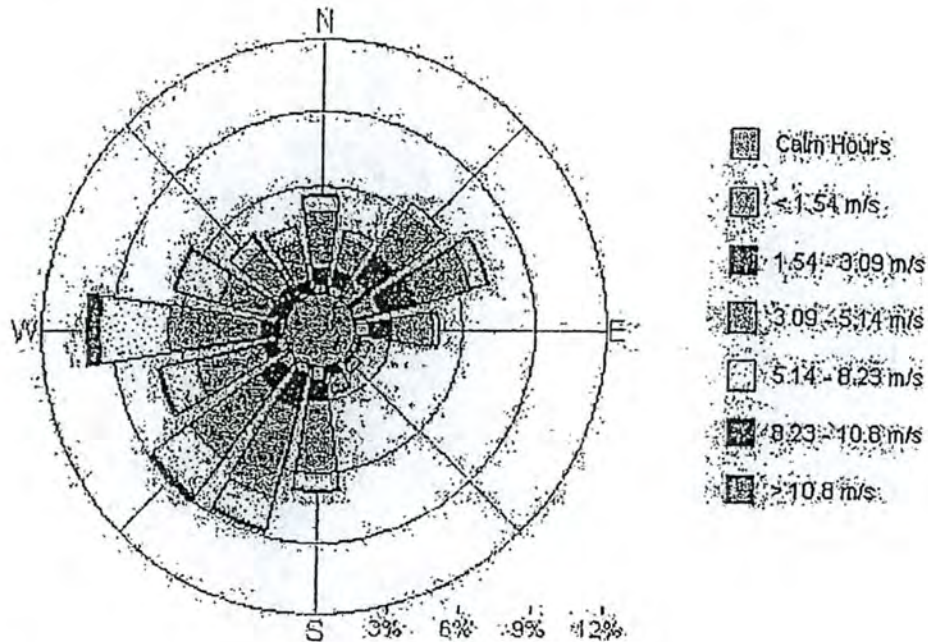
PROJECT NO: 0509020P
 DATE: 9/29/2005
 SCALE: NTS
 DRAWN BY: SP

 **Delta**
 Environmental
 Consultants, Inc.
 8008 Corporate Center Drive, Suite 100
 Charlotte, North Carolina 28226

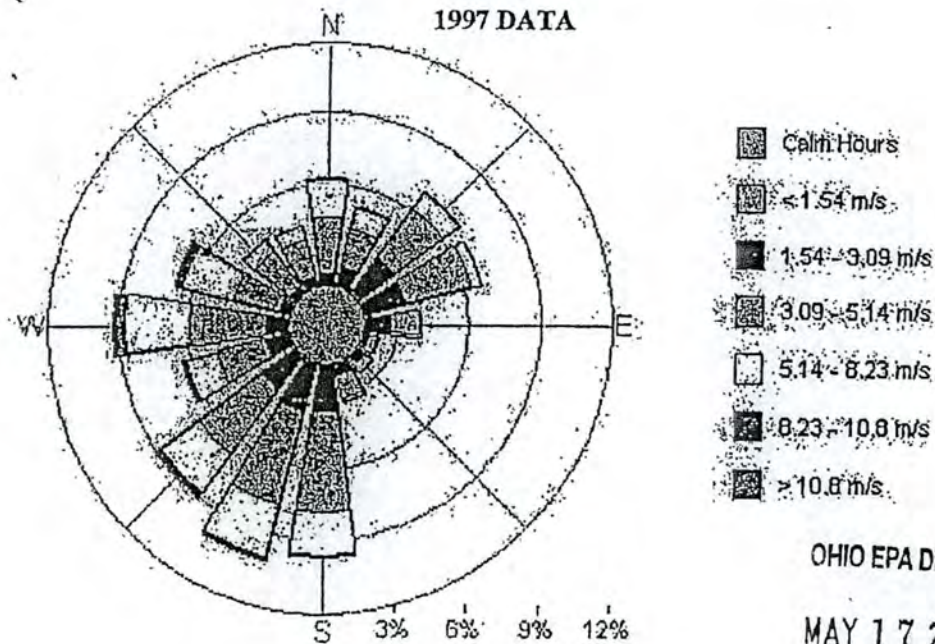
WIND ROSES

LUNKEN FIELD; Site # 724297; CINCINNATI, OH

Latitude N/S US 3906 N; Longitude E/W 8425 W



1997 DATA



1996 DATA

OHIO EPA DHWM

MAY 17 2007

000050

FIGURE 5 - WIND ROSE

USA LAMP & BALLAST RECYCLING, INC
7806 ANTHONY WAYNE AVE
CINCINNATI, OH

PROJECT NO: 0509020P

DATE: 9/29/2005

SCALE: NTS

DRAWN BY: SP

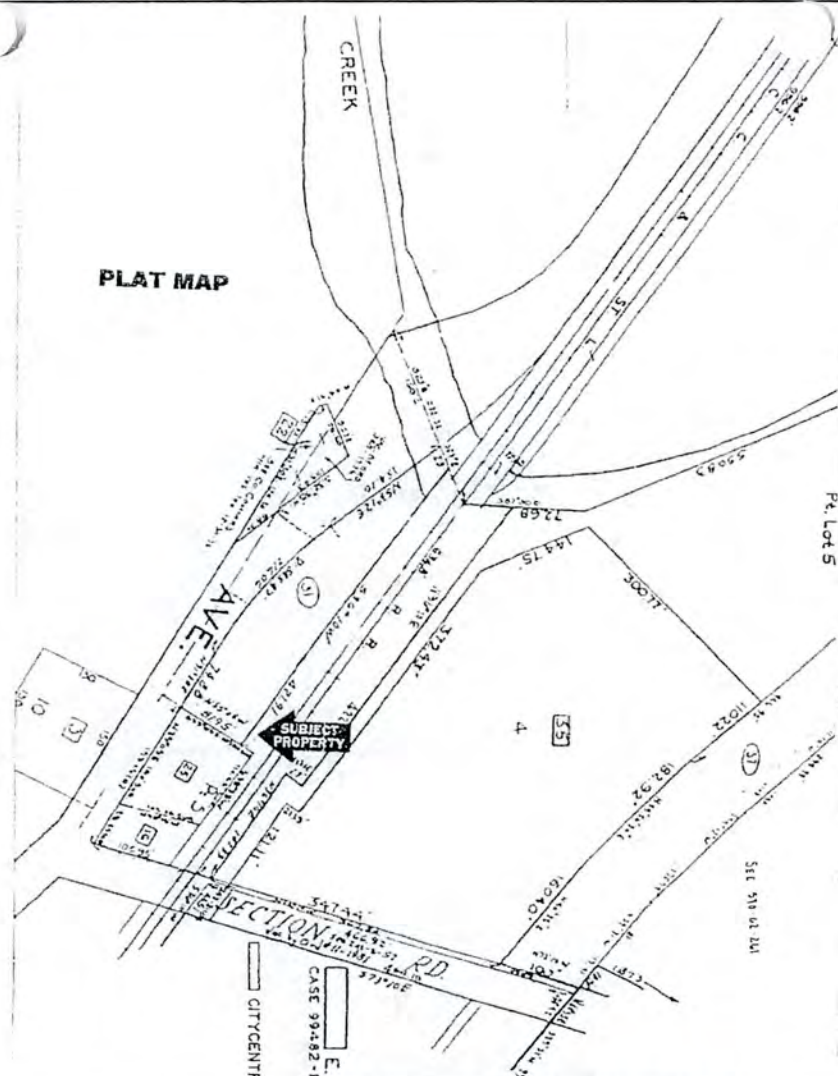


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Environmental
Consultants, Inc.

8008 Corporate Center Drive, Suite 100
Charlotte, North Carolina 28226

PLAT MAP



LEGAL DESCRIPTION

PARCEL I:

Situated in Section 1, Town 2, Entire Range 1, Miami Purchase, City of Cincinnati, Hamilton County, Ohio, described as follows:

Commencing at the intersection of the northerly line of Section Road (Seventy-Eighth Street) with the easterly right-of-way line of C.C.C. and St. L. Railroad, thence North 36° 10' East, along said easterly right-of-way line, a distance of 147.33 feet, thence North 55° 05' West, a distance of 77.00 feet to the westerly right-of-way line of said C.C.C. and St. L. Railroad, and the place of beginning, thence North 55° 05' West, a distance of 81.95 feet to the easterly line of Anthony Wayne Avenue; thence along the easterly line of Anthony Wayne Avenue, North 31° 30' East, a distance of 74.88 feet, northeasterly on a curved line deflecting to the right with a radius of 545.47 feet a distance of 216.06 feet (chord of said curve bears North 42° 21' East, a distance of 214.78 feet and North 52° 12' East, a distance of 154.10 feet, thence South 23° 00' East, a distance of 23.00 feet to the westerly right-of-way line of the C.C.C. and St. L. Railroad; thence South 36° 10' West, along said westerly right-of-way line, a distance of 421.91 feet to the place of beginning.

Containing 0.694 Acres.

Subject to and including easements, restrictions and agreements of record.

Auditor's Ref.: 242-1-31.

PARCEL II:

Situate, lying and being in Section 1, in Springfield Township, Hamilton County, Ohio, and in the City of Cincinnati, Ohio, being part of Lot 5 in S. Croshaw's Subdivision, and more particularly described as follows:

Beginning at a point in the east line of Anthony Wayne Avenue 53.45 feet North of the northeast corner of Section Road (formerly Reading Avenue) and Anthony Wayne Avenue (formerly the old Lockland Road) as measured along the east line of Anthony Wayne Avenue; thence continuing along the east line of Anthony Wayne Avenue North 35° 5' East, 140 feet; thence South 53° 5' East, 109.40 feet; thence South 38° 38' West, 110.44 feet; thence North 70° 15' West parallel with Section Road 105.38 feet to the place of beginning.

Subject to easements, conditions and restrictions of record.

Auditor's Ref.: 242-1-25.

FIGURE 6 - LEGAL BOUNDARIES

USA LAMP & BALLAST RECYCLING, INC
7806 ANTHONY WAYNE AVENUE
CINCINNATI, OH

PROJECT NO: 0509020P

DATE: 9/29/2005

SCALE: NTS

DRAWN BY: SP

Delta
Environmental
Consultants, Inc.
8008 Corporate Center Drive, Suite 100
Charlotte, North Carolina 28226

USA Lamp & Ballast Recycling, Inc.
 7806 Anthony Wayne Avenue
 Cincinnati, OH 45216
 513-641-4155
 EPA OHR 000 109 819

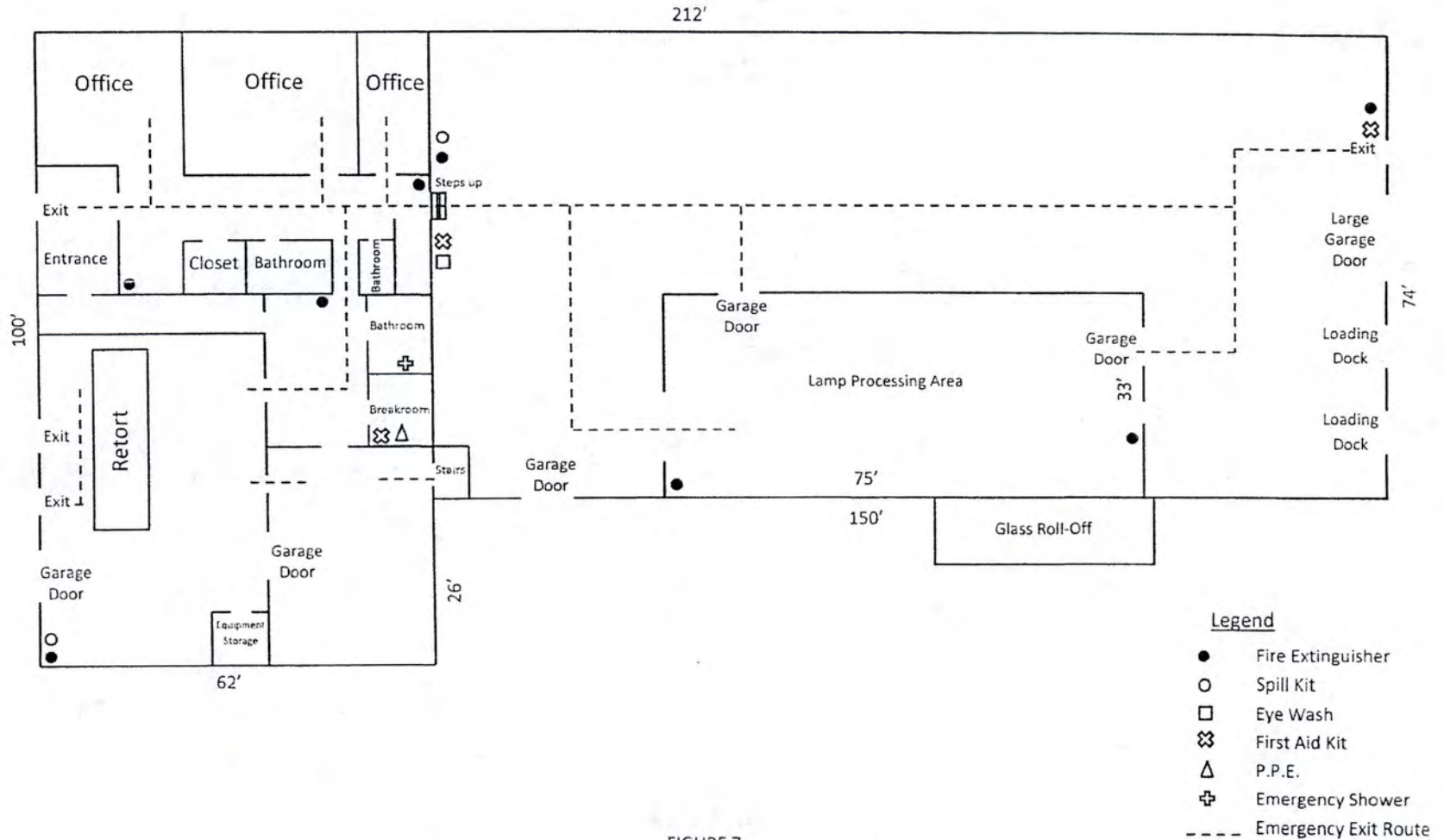
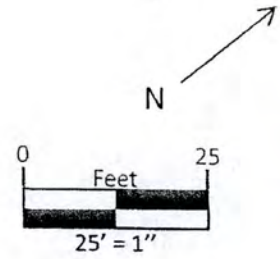


FIGURE 7
 Facility Layout
 Emergency Escape Routes and Emergency Equipment Locations
 Pg. 000063

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section C Waste Characteristics

SECTION C

**C-1: CHEMICAL AND PHYSICAL ANALYSES:
OAC 3745-50-44 (A)(2), 3745-54-13**

This section describes the chemical and physical nature of the hazardous wastes stored at the USA Lamp & Ballast Recycling, Inc facility. This section also includes the Waste Analysis Plan (WAP) for sampling, testing, and evaluating the wastes to insure that sufficient information is available for their safe handling.

USA Lamp & Ballast Recycling, Inc is to be permitted for the storage of Universal Waste Lamps, broken and crushed lamps and mercury-containing debris / residuals. This allows USA Lamp & Ballast Recycling, Inc the ability to service off-site generators by accepting wastes for storage, followed by the sorting and disassembly and consolidation of the material for shipment to alternative facilities for final treatment and disposal. USA Lamp & Ballast Recycling, Inc maintains a variety of alternative approvals with other facilities. The waste types stored and shipped at this facility include universal waste lamps, crushed and broken lamps and mercury containing debris residuals. Customers will be asked to complete a recycling order form and / or Bill of Lading listing the types of material sent to the facility for recycling. USA Lamp & Ballast Recycling maintains a file of MSDS sheets for lamps. Material other than lamps, lighting ballast and fixtures, batteries, mercury-containing devices, computer / electronic equipment or toner cartridges requires approval by facility manager / corporate health & safety officer before acceptance.

After a waste has met all the requirements for acceptance as previously stated, the generator will ship the material to the facility. Material is unloaded from the vehicles by trained technicians. Containers are visually checked for content and packaging integrity, counted or weighed, labeled and logged. Containers of lamps and crushed or broken lamps are then moved to a storage area to await processing. Materials containing mercury are separated into their constituent parts and the mercury reclaimed utilizing USA Lamp's on-site retort. The remaining material is sorted and consolidated for shipment to the final destination facilities.

**USA Lamp & Ballast Recycling, Inc - Part B Permit
Renewal**

Section C Waste Characteristics

C-1a: Containerized Waste

OAC 3745-50-44 (C)(1)(b)(i)

USA Lamp & Ballast Recycling, Inc. will comply with all requirements of OAC 3745-50-44 (C)(1)(b)(i). No free liquids are accepted. Containers are inspected by trained technicians upon arrival at the facility and contents of containers are examined during the sorting, consolidation, disassembly, repackaging and / or processing procedures to verify that no free liquids are present.

C-1b: Waste in Tank Systems

OAC 3745-50-91 (B)(2), 3745-55-92 (A)(2)

USA Lamp & Ballast Recycling, Inc is not requesting a permit for the storage of RCRA hazardous wastes in tanks. If USA Lamp & Ballast Recycling, Inc were to request a permit for the storage of RCRA hazardous wastes in tanks, we would comply with all rules listed in OAC 3745-50-91 (B)(2), 3745-55-92 (A)(2)

C-1c: Landfilled Wastes

OAC 3745-57-14 (B)

USA Lamp & Ballast Recycling, Inc is not operating a Hazardous Waste Landfill. If USA Lamp & Ballast Recycling, Inc were to operate a landfill in the future, we would comply with all rules listed in OAC 3745-57-14 (B).

C-1d: Wastes Incinerated and Wastes Used in Performance Tests

OAC 3745-50-44 (C)(7)(c)(i), (iii), (vii), and (viii)

USA Lamp & Ballast Recycling, Inc is not operating a Hazardous Waste Incinerator. If USA Lamp & Ballast Recycling, Inc were to operate a Hazardous Waste Incinerator in the future, we would comply with all rules listed in OAC 3745-50-44 (C)(7)(c)(i), (iii), (vii), and (viii).

C-1e: Wastes to be Land Treated

OAC 3745-50-44 (C)(5)(d)

USA Lamp & Ballast Recycling, Inc is not performing Land Treatment. If USA Lamp & Ballast Recycling, Inc were to perform Land Treatment in the future, we would comply with all rules listed in OAC 3745-50-44(C)(5)(d).

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section C Waste Characteristics

**C-1f: Wastes in Miscellaneous Treatment Units
OAC 3745-50-44 (C)(8)(d)**

USA Lamp & Ballast Recycling, Inc is not performing Treatment of Hazardous Waste in a Miscellaneous Treatment Unit. If USA Lamp & Ballast Recycling, Inc were to perform Treatment of Hazardous Waste in a Miscellaneous Treatment Unit in the future, we would comply with all rules listed in OAC 3745-50-44 (C)(8)(d).

**C-1g(1): Wastes in Boilers and Industrial Furnaces
Waiver of trial burn for destruction and removal efficiency (DRE)
OAC 3745-50-44 (C)(9)(a)(ii)**

USA Lamp & Ballast Recycling, Inc is not seeking to be permitted for a Boiler or Industrial Furnace. If USA Lamp & Ballast Recycling, Inc were to request to be permitted for a Boiler or Industrial Furnace in the future, we would comply with all rules listed in OAC 3745-50-44 (C)(9)(a)(ii).

**C-1g(2): Wastes in Boilers and Industrial Furnaces
Waiver of trial burn for metals
OAC 3745-50-44 (C)(9)(a)(iii)**

USA Lamp & Ballast Recycling, Inc is not seeking to be permitted for a Boiler or Industrial Furnace. If USA Lamp & Ballast Recycling, Inc were to request to be permitted for a Boiler or Industrial Furnace in the future, we would comply with all rules listed in OAC 3745-50-44 (C)(9)(a)(iii).

**C-1g(3): Wastes in Boilers and Industrial Furnaces
Waiver of trial burn for particulate matter
OAC 3745-50-44 (C)(9)(a)(iv)**

USA Lamp & Ballast Recycling, Inc is not seeking to be permitted for a Boiler or Industrial Furnace. If USA Lamp & Ballast Recycling, Inc were to request to be permitted for a Boiler or Industrial Furnace in the future, we would comply with all rules listed in OAC 3745-50-44 (C)(9)(a)(iv).

**USA Lamp & Ballast Recycling, Inc - Part B Permit
Renewal
Section C Waste Characteristics**

**C-1g(4): Wastes in Boilers and Industrial Furnaces
Waiver of trial burn for hydrogen chloride and chlorine gas
OAC 3745-50-44 (C)(9)(a)(v)**

USA Lamp & Ballast Recycling, Inc is not seeking to be permitted for a Boiler or Industrial Furnace. If USA Lamp & Ballast Recycling, Inc were to request to be permitted for a Boiler or Industrial Furnace in the future, we would comply with all rules listed in OAC 3745-50-44 (C)(9)(a)(v).

**C-1g(5): Wastes in Boilers and Industrial Furnaces
Data in lieu of trial burn
OAC 3745-50-44 (C)(9)(a)(vi)**

USA Lamp & Ballast Recycling, Inc is not seeking to be permitted for a Boiler or Industrial Furnace. If USA Lamp & Ballast Recycling, Inc were to request to be permitted for a Boiler or Industrial Furnace in the future, we would comply with all rules listed in OAC 3745-50-44 (C)(9)(a)(vi).

**C-1g(6): Wastes in Boilers and Industrial Furnaces
Residues
OAC 3745-50-44 (C)(9)(a)(iii)**

USA Lamp & Ballast Recycling, Inc is not seeking to be permitted for a Boiler or Industrial Furnace. If USA Lamp & Ballast Recycling, Inc were to request to be permitted for a Boiler or Industrial Furnace in the future, we would comply with all rules listed in OAC 3745-50-44 (C)(9)(a)(iii).

**C-2: WASTE ANALYSIS PLAN:
OAC 3745-50-44 (A)(3), 3745-54-13 (A), (B) & (C)**

Following are the methods used to evaluate the waste streams received for processing at this facility as outlined in OAC 3745-54-13 and 40 CFR 264.13. The Waste Analysis Plan is divided into four major steps: Pre-acceptance, Acceptance (Fingerprint Analysis), In Process (Consolidation), and Off-site Shipment (Alternative Approval) Analysis.

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section C Waste Characteristics

As part of the waste profiling process, brief descriptions of off-site hazardous waste generating processes are obtained, updated, and kept at the facility as part of the operating permit.

Wastes generated or managed at the facility are adequately described, including identity of wastes, approximate quantities managed, process generating the waste, rationale for identifying the waste as hazardous, and other appropriate OH EPA waste classifications. The complete Waste Analysis Plan (WAP) is presented as Appendix A

C-2a: Parameters and Rationale: OAC 3745-54-13 (B)(1)

USA Lamp & Ballast Recycling, Inc intends to accept wastes for storage prior to the processing of the lamps, reclaiming of mercury, or shipment of materials off-site for ultimate treatment and disposal. The off-site shipments have been categorized into programs based on material types and characteristics. The analytical parameters and justification for each waste is based on requirements associated with the ultimate disposal program chosen. The analysis to be performed during pre-acceptance evaluation and the Acceptance evaluation for each of these programs is provided in Appendix A. All wastes will be evaluated according to the parameters provided in Appendix A before shipment to the facility. Upon receipt, an Acceptance analysis will be performed to confirm that a waste conforms to the original classification, prior to the waste being placed in storage. USA Lamp & Ballast Recycling, Inc will use analytical and sampling methods from EPA publication SW-846 to respond to RCRA-related sampling and analysis requirements.

C-2b: Test Methods: OAC 3745-54-13 (B)(2)

If the facility elects to use sampling and laboratory analysis in the future, due to accepting materials other than lamps, lighting ballast and fixtures, batteries, mercury-containing devices, computer / electronic equipment or toner cartridges, testing and analytical methods for each parameter will be specified and will comply with rules listed in OAC 3745-54-13 (B)(2). USA Lamp & Ballast Recycling will use an off-site lab. Analytical methods will be chosen by considering the physical state of the waste, analyses of interest, and required detection limits. All testing and analytical

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section C Waste Characteristics

methods will be standard methods and accompanied by standard operating procedures. USA Lamp & Ballast Recycling, Inc will use analytical and sampling methods from EPA publication SW-846 to respond to RCRA-related sampling and analysis requirements. Deviations from the methods presented in the WAP will be documented in the operating record and any deviation in method will be equivalent to an approved method.

**C-2c: Sampling Methods:
OAC 3745-54-13 (B)(3) and SW-846 Chapter 9**

When sampling and laboratory analysis is used to determine the physical and chemical characteristics of a waste, the methods to obtain a representative sample must be provided. USA Lamp & Ballast Recycling, Inc does not currently sample or use laboratory analysis for any waste, however may elect to do so in the future. Currently, the facility conducts visual monitoring for all waste analysis. If sampling or laboratory analysis is needed in the future, USA Lamp & Ballast Recycling, Inc will use analytical and sampling methods from EPA publication SW-846 Chapter 9 and will comply with rules listed in OAC 3745-54-13 (B)(3).

**C-2d: Frequency of Analysis:
OAC 3745-54-13 (A)(3) & (B)(4)**

Sampling and laboratory analysis is not currently conducted at the site, however visual monitoring is conducted daily. If sampling and laboratory analysis were to be conducted on-site, USA Lamp & Ballast Recycling would comply with rules listed in OAC 3745-54-13 (A)(3) & (B)(4) and use analytical and sampling methods from EPA publication SW-846 to respond to RCRA-related sampling and analysis requirements.

**C-2e: Additional Requirements for Wastes Generated Off-Site:
OAC 3745-54-13 (B)(5) & (C)**

Materials offered to USA Lamp & Ballast Recycling, Inc for processing will be analyzed by USA Lamp prior to acceptance. The analysis will consist of a visual survey of the materials to confirm that material listed on the recycling order form and / or Bill of Lading is correct and accurate. All containers are visually surveyed during the unloading process and further examined during the sorting, consolidation,

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section C Waste Characteristics

disassembly, repackaging and / or processing procedures. If the material does not conform to our requirements, it will be rejected and returned to the generator. The generator will be notified via phone or email that that load is unacceptable and arrangements will be made to either return the material to the generator or to an alternate facility designated by the generator. Appropriate paperwork will accompany the rejected material. If sampling and laboratory analysis were to be conducted on-site, USA Lamp & Ballast Recycling would comply with rules listed in OAC 3745-54-13 (A)(3) & (B)(4) and use analytical and sampling methods from EPA publication SW-846 to respond to RCRA-related sampling and analysis requirements.

**C-2f: Additional Requirements for Ignitable, Reactive or Incompatible Wastes:
OAC 3745-54-13 (B)(6), 3745-54-17**

USA Lamp & Ballast Recycling, Inc will comply with the requirements listed in OAC 3745-54-13 (B)(6), 3745-54-17 and use analytical and sampling methods from EPA publication SW-846 to respond to RCRA-related sampling and analysis requirements.

C-3 WASTE ANALYSIS REQUIREMENTS FOR LAND DISPOSAL RESTRICTIONS

**C-3a: Applicability for Treatment Standards
OAC 3745-270-40**

USA Lamp & Ballast Recycling, Inc does not treat wastes. All materials received at the facility are reclaimed and/or recycled. USA Lamp & Ballast Recycling, Inc will not land dispose restricted wastes, hazardous debris, and/or contaminated soils unless they meet the applicable standards identified in OAC 3745-270-40 to 49.

**C-3a(1) Waste Characterization
OAC 3745-54-13 (A)**

Materials offered to USA Lamp & Ballast Recycling, Inc for processing will be analyzed by USA Lamp prior to acceptance. The analysis will consist of a visual survey of the materials to confirm that material listed on the recycling order form and / or Bill of Lading is correct and accurate. If the material does not conform to our requirements, it will be rejected and returned to the generator in accordance with Section C-2e. USA Lamp & Ballast Recycling will comply with rules listed in OAC 3745-54-13 (A) and use analytical and

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section C Waste Characteristics

sampling methods from EPA publication SW-846 to respond to RCRA-related sampling and analysis requirements.

C-3b: Prohibitions:

OAC 3745-270-03 and OAC 3745-270-30 through 39

This section does not apply to the facility. USA Lamp & Ballast will comply with all rules listed in OAC 3745-270-03 and OAC 3745-270-30 through 39.

**C-3c: Sampling and Analytical Requirements for Treatment Residues
OAC 3745-270-07 (B)**

This section does not apply to the facility. USA Lamp & Ballast Recycling, Inc does not treat wastes. All materials received at the facility are reclaimed and/or recycled. If sampling or laboratory analysis is needed in the future, USA Lamp & Ballast Recycling, Inc will use analytical and sampling methods from EPA publication SW-846 Chapter 9 and will comply with rules listed in OAC 3745-270-07 (B).

**C-3c(1) Sampling and Analytical Procedures
Appendix to OAC 3745-270-07 (B)**

This section does not apply to the facility. If sampling or laboratory analysis is needed in the future, USA Lamp & Ballast Recycling, Inc will use analytical and sampling methods from EPA publication SW-846 Chapter 9 and will comply with rules listed in OAC 3745-270-07 (B).

**C-3c(2) Wastes or Contaminated Soils with Treatment Standards
Expressed as Concentrations in the Waste Extract:
OAC 3745-270-07 (B)(1)**

This section does not apply to the facility. If USA Lamp & Ballast Recycling, Inc were to provide treatment in the future, we would provide procedures for testing the residues or extract of such residues to assure they meet applicable treatment standards per OAC 3745-270-07 (B)(1).

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**C-3c(3) Wastes or Contaminated Soils with Treatment Standards
Expressed as Concentrations of the Waste:**
OAC 3745-270-07 (B)(2)

This section does not apply to the facility. If USA Lamp & Ballast Recycling, Inc were to provide treatment in the future, we would provide procedures for testing the residue (not the extract of such residues) to assure they meet applicable treatment standards per OAC 3745-270-07 (B)(2) and EPA publication SW-846.

C-3c(4) Frequency of Analysis:
OAC 3745-54-13 (A)(3), OAC 3745-270-07 (B)

This section does not apply to the facility. If USA Lamp & Ballast Recycling, Inc were to provide treatment in the future, we would follow all requirements in OAC 3745-54-13 (A)(3), OAC 3745-270-07 (B) and EPA publication SW-846 as to the frequency of analysis.

C-3d: Notification and Certification Requirements
OAC 3745-270-07(A), (B)(3), (B)(4), and (B)(5)

C-3d(1) Retention of Generator Notices and Certifications
OAC 3745-270-07 (A)

USA Lamp & Ballast Recycling, Inc will ensure that an appropriate notification/certification is provided for each waste prior to acceptance. All notifications/certifications submitted by generators will be maintained in the operating record for 3 years. The 3-year retention period is automatically extended during the course of any unresolved enforcement action.

**C-3d(2) Notification and Certification Requirements for Treatment
Residues shipped to land disposal facilities:**
OAC 3745-270-07 (B)(3) and (B)(4)

This section does not apply to the facility. The facility operates a lamp crusher which separates the glass, metal and powder components. No waste is treated on-site. If USA Lamp & Ballast Recycling were to offer treatment in the

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

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future we would comply with all notification and certification requirements listed in OAC 3745-270-07 (B)(3) and (B)(4) for treatment residues shipped to land disposal facilities.

**C-3d(3) Notification and Certification Requirements for Wastes with Organic Constituents:
OAC 3745-270-07B (4)(c)**

This section does not apply to the facility. If USA Lamp & Ballast Recycling were to offer treatment in the future we would comply with all notification and certification requirements listed in OAC 3745-270-07B (4)(c) for Waste with Organic Constituents.

**C-3d(4) Notification and Certification Requirements for Characteristic Wastes:
OAC 3745-270-07B (4)(d) and (e)**

This section does not apply to the facility. If USA Lamp & Ballast Recycling were to offer treatment in the future we would comply with all notification and certification requirements listed in OAC 3745-270-07B (4)(d) and (e) for Characteristic Wastes.

**C-3d(5) Notification and Certification for Wastes to be Further Managed:
OAC 3745-270-07 (B)(5)**

This section does not apply to the facility. If USA Lamp & Ballast Recycling were to offer treatment in the future we would comply with all notification and certification requirements listed in OAC 3745-270-07 (B)(5) for Wastes to be Further Managed.

**C-3d(6) Notification and Certification Requirements for Land Disposal Facilities:
OAC 3745-270-07 (C)**

This section does not apply to the facility. If USA Lamp & Ballast Recycling were to offer treatment in the future we would comply with all notification and certification requirements listed in OAC 3745-270-07 (C) for Land Disposal Facilities.

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Section C Waste Characteristics**

**C-3d(7) Notification and Certification Requirements for Facilities Treating Hazardous Debris:
OAC 3745-270-07 (D)**

This section does not apply to the facility. If USA Lamp & Ballast Recycling were to offer treatment in the future we would comply with all notification and certification requirements listed in OAC 3745-270-07 (D) for Facilities Treating Hazardous Debris.

**C-3d(8) Notification and Certification Requirements for Facilities Treating Contaminated Soil:
OAC 3745-270-07 (E)**

This section does not apply to the facility. If USA Lamp & Ballast Recycling were to offer treatment in the future we would comply with all notification and certification requirements listed in OAC 3745-270-07 (E) for Facilities Treating Contaminated Soil.

**C-3d(9) Notification and Certification Requirements for Recyclable Materials Used in a Manner Constituting Disposal:
OAC 3745-270-07 (B)(6)**

This section does not apply to the facility. If USA Lamp & Ballast Recycling were to offer treatment in the future we would comply with all notification and certification requirements listed in OAC 3745-270-07 (B)(6) for Recyclable Materials Used in a Manner Constituting Disposal.

**C-3e: Additional Requirements Pertaining to Storage of Restricted Wastes:
OAC 3745-270-50 (A), (D), & (F)**

USA Lamp & Ballast Recycling, Inc does not have any restricted waste; therefore this section is not applicable. If USA Lamp & Ballast Recycling, Inc were to have restricted waste in the future, we would comply with the additional requirements pertaining to the storage of restricted waste per OAC 3745-270-50 (A), (D), & (F).

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**C-3f: Addition Requirements for Treatment Surface Impoundment Exemption:
OAC 3745-270-04**

USA Lamp & Ballast Recycling, Inc does not have a Hazardous Waste Surface Impoundment; therefore this section is not applicable. If USA Lamp & Ballast were to have a Hazardous Waste Surface Impoundment in the future, we would follow all requirements per OAC 3745-270-04.

**C-3g: Extensions, Exemptions, and Variances:
OAC 3745-270-05, 06, and 44**

USA Lamp & Ballast Recycling, Inc is not requesting Extensions, Exemptions or Variances. If we require Extensions, Exemptions or Variances in the future, we will comply with the requirements listed in OAC 3745-270-05, 06, and 44.

**C-3g(1) Case-by-Case Extensions to an Effective Date:
OAC 3745-270-05**

USA Lamp & Ballast Recycling, Inc is not requesting Extensions to an Effective Date. If we require an Extension to an Effective Date in the future, we will comply with the requirements listed in OAC 3745-270-05.

**C-3g(2) Exemption from a Prohibition:
OAC 3745-270-06**

USA Lamp & Ballast Recycling, Inc is not requesting an Exemption from a Prohibition. If we require an Exemption from a Prohibition in the future, we will comply with the requirements listed in OAC 3745-270-06.

**C-3g(3) Variance from a Treatment Standard:
OAC 3745-270-44**

USA Lamp & Ballast Recycling, Inc is not requesting a Variance from a Treatment Standard. If we require a Variance from a Treatment Standard in the future, we will comply with the requirements listed in OAC 3745-270-44.

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**C-3g(4) Requirements for Land Disposal Facilities with an Approved Exemption, Extension or Variance:
OAC 3745-279-05, 06, and 44**

USA Lamp & Ballast Recycling, Inc is not requesting an Exemption, Extension or Variance from a Treatment Standard. If we require and receive an Approved Exemption, Extension or Variance from a Treatment Standard in the future, we will comply with the requirements listed in OAC 3745-279-05, 06 and 44.

APPENDIX A
WASTE ANALYSIS PLAN

Waste Analysis Plan
USA LAMP & BALLAST RECYCLING, INC
Cincinnati, OH
Delta Project No. 0509020P

Prepared for:
USA LAMP & BALLAST RECYCLING, INC
7806 Anthony Wayne Avenue
Cincinnati, OH 45216
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September 2005

Revised November 16, 2009

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ATTACHMENTS

1. WASTE MATERIAL PROFILE

USA Lamp & Ballast Recycling, Inc
7806 Anthony Wayne Ave.
Cincinnati, OH 45216
Waste Analysis Plan

1.0 Facility Description

USA Lamp & Ballast Recycling, Inc collects universal waste lamps, batteries and mercury-containing devices along with lighting ballast and fixtures, and computer / electronic equipment for processing to make it more amenable to be recycled. The items are sorted, disassembled and repackaged to be sent to final destination facility. Mercury is reclaimed utilizing the on-site mercury retort. No waste is treated on-site.

1.1 Description of Waste Generating Processes and Activities

The facility crushes fluorescent lamps and separates the components for recycling. The lamp recycling process entails the crushing of lamps in a controlled environment. Bulbs are fed into the processor via conveyor belt. The bulbs are crushed into a uniform size and the debris separated into three product streams. The major components are calcium phosphate powder (phosphate powder) containing mercury, glass and aluminum. Both hazardous (phosphate powder contaminated with mercury) and non-hazardous materials (glass and aluminum) streams, as classified under the Resource Conservation and Recovery Act (RCRA), are generated at the facility.

The mercury vapor liberated during the crushing process is captured in an activated carbon filter bed. The phosphate powder is collected under negative pressure in sealed steel drums that are connected to the processor. The unit has connection for HEPA vacuuming and spill cleanup. The phosphor powder contains the majority of mercury: this material is retorted on-site to recover the mercury for sale on the open market. The aluminum end caps are sold as scrap. The glass is currently TCLP tested then placed into a contained landfill.

Mercury containing phosphate powder is stored and then retorted utilizing USA Lamp's on-site mercury retort to reclaim the mercury. Non-hazardous glass and aluminum are stored in material handlers onsite until shipped off-site for reclamation.

The facility also temporarily stores fluorescent light ballasts (small capacitors), universal waste mercury-containing equipment per USA EPA 40 CFR Parts 260, 261, 264, 265, 268

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270 and 273 along with computers and electronics. The ballasts are placed in drums for storage. The batteries are either stored in drums, pails, Gaylord containers or on wooden pallets. The computer / electronic equipment are stored in Gaylord boxes or on wooden pallets. There is not any processing (recycling) associated with the ballast, battery or computer / electronic storage. The items are sorted, disassembled and repackaged to be sent to final destination facility. USA Lamp & Ballast works with various Recyclers to achieve proper recycling of these items. USA Lamp & Ballast reserves the right to remove the mercury ampules from mercury-containing devices according to all applicable rules and regulations.

The facility is licensed for the transportation of wastes.

1.2 Identification and Classification of Hazardous Wastes Managed

The hazardous material generated at the facility is phosphate powder contaminated with mercury. The waste generating process is described in Section 1.1. The waste is listed as fluorescent bulbs containing mercury and would be classified as D009 is the OEPA hazardous waste codes.

1.3 Description of Hazardous Waste Management Units

USA Lamp & Ballast Recycling, Inc does not currently have any Hazardous Waste Management Units; therefore this section is not applicable.

2.0 Waste Analysis Parameters OAC Rule 3745-54-13(B)(1)

2.1 Selection of Waste Analysis Parameters

USA Lamp & Ballast Recycling, Inc intends to accept wastes for storage prior to shipment off-site for ultimate treatment and disposal. The off-site shipments have been categorized into programs based on material types and characteristics. The analytical parameters and justification for each waste is based on the requirements associated with the ultimate disposal program chosen. Materials entering the facility are pre-approved by contract with the customer, and documented by Bill of Lading. Upon receipt, an Acceptance analysis will be performed to confirm that a waste conforms to the original classification, prior to the waste being placed in storage.

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2.2 Additional Information Regarding Selection of fingerprint Parameters

This facility does not elect to specify any fingerprint parameters; therefore this section does not apply.

2.3 “Mandatory” and “Supplemental” Parameters

This facility does not elect to specify any mandatory or supplemental analyses; therefore this section does not apply.

3.0 Sampling Procedures OAC Rule 3745-54-13(B)(3)

When sampling and laboratory analysis is used to determine the physical and chemical characteristics of a waste, the methods to obtain a representative sample must be provided. USA Lamp & Ballast Recycling, Inc does not currently sample or use laboratory analysis for any waste, however may elect to do so in the future. Currently, the facility conducts visual monitoring for all waste analysis.

3.1 Sampling Strategies

USA Lamp & Ballast Recycling, Inc currently conducts visual monitoring. No sampling is required and therefore this section does not apply. If the facility elects to conduct sampling in the future, a description of the sampling approach and sample type will be included in the plan. The facility may consider using the Data Quality Objective (DQO) process design of a sampling strategy to comply with the requirements of this rule.

3.2 Sampling Equipment

No sampling equipment is necessary for visual monitoring; therefore this section does not apply to the facility. If the facility elects to conduct sampling in the future, the WAP will be updated to include all sampling equipment to be used for collection of each sample. The equipment chosen will be appropriate based on physical and chemical characteristics of the waste, the sampling method, and any additional waste-specific or site-specific factors.

3.3 Maintaining and Decontaminating Sampling Equipment

No sampling equipment is necessary for visual monitoring; therefore this section does not apply to the facility. If the facility elects to conduct sampling in the future, the WAP will be

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updated to include maintenance and decontamination procedures for all sampling equipment.

3.4 Sample Preservation, Holding Times and Containers

No sampling equipment is necessary for visual monitoring; therefore this section does not apply to the facility. If the facility elects to conduct sampling in the future, the WAP will be updated to include all sample preservation methods and holding times as well as types of containers used.

3.5 Sampling Quality Assurance and Quality Control Procedures

No sampling is necessary for visual monitoring; therefore this section does not apply to the facility. If the facility elects to conduct sampling in the future, the WAP will be updated to include quality assurance and quality control procedures for each sampling collected.

3.6 Health and Safety Protocols

No sampling is necessary for visual monitoring; therefore this section does not apply to the facility. If the facility elects to conduct sampling in the future, the WAP will be updated to integrate health and safety requirements. The WAP will be used as an operational manual at the facility.

4.0 Testing and Analytical Methods OAC Rule 3745-54-13(B)(2)

4.1 Laboratory

If the facility elects to conduct sampling in the future, the WAP will specify the laboratory chosen to perform analytical services, and whether the site is on-site or a commercial environmental testing laboratory. If the facility elects to use an off-site commercial laboratory, laboratory selection will be based on the following:

- The laboratory's comprehensive QA/QC program, including chain-of-custody procedures and treatment of the blanks, spikes, and duplicate samples used to measure precision and accuracy,
- The laboratory's technical analytical expertise in achieving required detection limits and using quality technicians and equipment,

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- The effective information management providing clear, concise, and accurate data reports and QA/QC documentation for data validation.

If the facility elects to use an off-site laboratory in the future, the WAP will be updated to state that the off-site laboratory will utilize the analytical methods specified in the WAAP and appropriate QA/QC procedures.

4.2 Testing and Analytical Methods

If the facility elects to use sampling and laboratory analysis in the future, testing and analytical methods for each parameter will be specified. Analytical methods will be chosen by considering the physical state of the waste, analyses of interest, and required detection limits. All testing and analytical methods will be standard methods and accompanied by standard operating procedures. Deviations from the methods presented in the WAP will be documented in the operating record.

4.3 Laboratory Quality Assurance and Quality Control Procedures

If the facility elects to use sampling and laboratory analysis in the future, waste analysis decisions will be based on the data of known quality. To document that appropriate laboratory quality assurance/quality control (QA/QC) procedures are used, the WAP will include or incorporate by reference a laboratory quality assurance plan which contains the elements of appropriate laboratory QA/QC procedures. Additionally, analytical method-specific QA/QC will be discussed, either in the laboratory quality assurance plan or include in standard operating procedures for each method. General elements relating to appropriate laboratory operations, at minimum, will include the following:

- General description of the laboratory facility,
- List of available equipment and method capabilities,
- Standard Operating Procedures,
- Description of laboratory QA/QC procedures,
- Quality assurance review,
- Laboratory records and minimum three year retention in the operation record.

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4.4 Use of Acceptable Generator Knowledge in TSD Waste Analysis

This section does not apply to the facility.

5.0 Waste Re-evaluation Frequencies OAC Rule 3745-54-13(B)(4)

At a minimum, the waste analysis will be reviewed or repeated when the generating process changes, or when the waste arriving at the facility does not match the pre-approved waste characterization information supplied by the generator.

When initial shipments of a waste stream include laboratory analysis, each subsequent re-evaluation does not necessarily require a new laboratory analysis. The generator and/or facility must re-evaluate the waste stream as necessary, which may only include a review of the generating process for changes. Significant changes that may impact waste stream characteristics could be further evaluated through sampling and laboratory analysis.

6.0 Special Procedural Requirements

USA Lamp & Ballast Recycling, Inc does not have any special procedural requirements; therefore this section is not applicable.

ATTACHMENT 1 - APPENDIX A
WASTE MATERIAL PROFILE

OHIO EPA DHWM

MAY 17 2007

000086

USA LAMP & BALLAST RECYCLING, INC

WASTE MATERIAL PROFILE (F)

Approval #:

(Office Use Only)

I. GENERATOR INFORMATION

GENERATOR NAME:	_____	BILL TO:	_____
GENERATOR ADDRESS:	_____	CONTACT:	_____
	_____	PHONE:	_____
GENERATOR CONTACT:	_____	ADDRESS:	_____
GEN. PHONE:	_____		_____
GEN. FAX:	_____	GEN. EPA ID #:	_____
WASTE DESCRIPTION:	_____		
COMMON NAME:	_____		
PROCESS GENERATING WASTE:	_____		

II. WASTE CHARACTERIZATION

CONSTITUENTS: (Must be \geq 100%)

_____	_____	-	_____	%	_____	_____	-	_____	%
_____	_____	-	_____	%	_____	_____	-	_____	%
_____	_____	-	_____	%	_____	_____	-	_____	%
_____	_____	-	_____	%	_____	_____	-	_____	%

PROPERTIES:

Liquid: _____ % Density: _____ lbs/gal Special Handling Requirements: (if applicable)
Solid: _____ % pH: _____
Sludge: _____ % Flashpoint: _____ °F

SHIPPING INFORMATION:

Proper DOT Shipping Name: _____

Hazard Class: _____ UN/NA Number: _____ Packing Group _____ ERG # _____
Reportable Quantity: _____ EPA Hazardous Waste Codes (if applicable): _____

III. WASTE MATERIALS METAL CONTENT

<u>METALS:</u>	<u>LEVELS</u> (ppm or mg/l):	<u>METALS:</u>	<u>LEVELS</u> (ppm or mg/l):
Arsenic	_____	Barium	_____
Cadmium	_____	Chromium	_____
Lead	_____	Mercury	_____
Selenium	_____	Silver	_____
Nickel	_____	Thallium	_____
Copper	_____	Zinc	_____

IV. PACKAGING INFORMATION

Drum: ☐ Type/Size: _____ Cu Yd Box: ☐ Cu Yd Bag: ☐
Other (please describe): _____

Anticipated Volume per Shipment: _____

OHIO EPA DHWM 000037

MAY 17 2007

USA LAMP & BALLAST RECYCLING, INC

V. WASTE MATERIALS INCLUDED

For materials marked with an (*) please provide additional detail in the space provided below.

- | | | | |
|--|---|--|---|
| <input type="checkbox"/> Mercury Debris | <input type="checkbox"/> Thermometers, etc. | <input type="checkbox"/> Regulators | <input type="checkbox"/> Mercury in Soil |
| <input type="checkbox"/> Fluorescent Tubes | <input type="checkbox"/> Batteries (Varied) | <input type="checkbox"/> COD Solution | <input type="checkbox"/> Mercury in Glass |
| <input type="checkbox"/> Phosphate Powder | <input type="checkbox"/> Mercury Batteries | <input type="checkbox"/> Solid Compounds* | <input type="checkbox"/> Mercury in Metal |
| <input type="checkbox"/> Crushed Lamps | <input type="checkbox"/> Mercury Relays | <input type="checkbox"/> Liquid Compounds* | <input type="checkbox"/> Carbon |
| <input type="checkbox"/> HID Lamps | <input type="checkbox"/> Mercury Switches | <input type="checkbox"/> Sludges* | <input type="checkbox"/> Dental Materials |
| <input type="checkbox"/> Other: _____ | | | |

VI. SPECIAL CHARACTERISTICS

DOES ANY OF THE WASTE MATERIAL CONTAIN ANY OF THE FOLLOWING CHARACTERISTICS?:

	YES	NO
HAZARDOUS CHARACTERISTICS (other than mercury).....	<input type="checkbox"/>	<input type="checkbox"/>
BTU VALUE > 5,000 BTU/LB. (other than those listed in 40CFR266 Appendix VIII)	<input type="checkbox"/>	<input type="checkbox"/>
MERCURY COMPOUNDS (other than oxide or sulfide).....	<input type="checkbox"/>	<input type="checkbox"/>
REACTIVES	<input type="checkbox"/>	<input type="checkbox"/>
CORROSIVES (Complete Underlying Hazardous Constituents on LDR Notification)	<input type="checkbox"/>	<input type="checkbox"/>
IGNITABLE	<input type="checkbox"/>	<input type="checkbox"/>
AQUEOUS SOLUTIONS	<input type="checkbox"/>	<input type="checkbox"/>
ORGANIC COMPOUNDS	<input type="checkbox"/>	<input type="checkbox"/>
CONTAINS > 500 PPM OF ANY 40 CFR PART 261 APPENDIX VIII CONSTITUENTS	<input type="checkbox"/>	<input type="checkbox"/>
IS THIS WASTE SUBJECT TO SUBPART CC REGULATIONS (i.e. contains \geq 500 ppm Volatile Organic Compounds (VOCs))	<input type="checkbox"/>	<input type="checkbox"/>
UNDERLYING HAZARDOUS CONSTITUENTS, OTHER THAN MERCURY, LISTED IN 40CFR268.48	<input type="checkbox"/>	<input type="checkbox"/>

IF YES WAS ANSWERED TO ANY ITEM ABOVE, PLEASE EXPLAIN:

GENERATOR CERTIFICATION

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS CONTAIN TRUE AND ACCURATE DESCRIPTIONS OF THE WASTE. ALL RELEVANT INFORMATION REGARDING KNOWN OR SUSPECTED HAZARDS IN THE POSSESSION OF THIS GENERATOR HAS BEEN DISCLOSED.

SIGNATURE

DATE

PRINT OR TYPE NAME AND TITLE

*NOTE: GENERATORS SHIPPING WASTE MATERIALS TO USA LAMP & BALLAST MUST RE-CERTIFY THEIR WASTE STREAMS ANNUALLY

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000088

MAY 17 2007

**USA Lamp & Ballast Recycling, Inc - Part B Permit
Renewal**

Section D Container Storage and Containment Building

SECTION D

D-1: CONTAINERS

**D-1a: Description of Containers
OAC 3745-55-71, 3745-55-72**

The containers used are plastic pails, steel or plastic drums and corrugated boxes. Customers send items to USA Lamp & Ballast in original manufacturer's boxes and containers or manufactured boxes and containers. The containers used at the facility are both new and used and meet or exceed DOT standards. All containers are properly labeled and stored in the appropriate area. Lamps are labeled with customer name, date received and BOL number.

Containers used for storage will consist of the following:

Fibre, steel and poly drums (5-55 gallons)

Corrugated Boxes: 48 inches x 12 inches x 12 inches, holds approximately 64 - 4ft and under fluorescent straight lamps depending on the diameter of the lamp. Style is regular slotted container with flaps meeting in the center or full-overlap. C Flute; Edge Crush Test = T32 (32 lbs of pressure per square inch) minimum.

96 inches x 9 inches x 9 inches, holds approximately 36 - 5ft to 8ft fluorescent lamps depending on the diameter of the lamp. Style is regular slotted container with flaps meeting in the center or full-overlap. C Flute; Edge Crush Test = T32 (32 lbs of pressure per square inch) minimum.

22-7/8 inches x 15 inches x 27 inches, holds approximately 24 U-shaped fluorescent bulbs or 1- 50 HID bulbs depending on the diameter of the bulbs. Style is regular slotted container with

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section D Container Storage and Containment Building

flaps meeting in the center or full-overlap. C Flute; Edge Crush Test = T32 (32 lbs of pressure per square inch) minimum.

1 cubic yard quadruple wall gaylord boxes, holds approximately 1000 HID Lamps depending on the diameter of the bulbs. Also used for storage of dry cell batteries, scrap metals and miscellaneous electronics.

Dimensions of the boxes provided by the customers will vary depending on the lamp manufacturer, but will typically hold approximately 36 - 4ft fluorescent lamps and 15 - 8ft fluorescent bulbs depending on the diameter of the bulbs.

D-1b: Container Management Practices

OAC 3745-54-35, 3745-55-71, 3745-55-73, 3745-55-74

Storage containers under a cubic yard and under 55 gallons are consolidated into cubic yard size corrugated boxes, and 55-gallon steel drums. The containers are stored in the facility with 24-inch wide aisles between them.

The containers remain closed and stored in the appropriate locations, unless adding or removing items. Plastic pails, steel or plastic drums and corrugated boxes within the facility are required to be closed when not in use and/or prior to shipment or processing. Containers are moved through the facility using forklifts, pallet jacks, and drum dolly.

Storage areas are visually inspected continuously throughout the day for leaks or deteriorated boxes, pails or drums. A weekly drum inspection form is completed and maintained in the inspection log for a minimum of three years. Containers observed to be leaking or in poor condition are removed, placed in a new container, and placed over a spill pallet. Any pallets found to be damaged will be replaced.

**USA Lamp & Ballast Recycling, Inc - Part B Permit
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Section D Container Storage and Containment Building

**D-1c: Special Requirements for Ignitable, Reactive or Incompatible Wastes
OAC 3745-55-76, 3745-55-77, 3745-54-17**

USA Lamp & Ballast Recycling, Inc will comply with OAC 3745-55-76, 3745-55-77 and 3745-54-17. Containers holding ignitable or reactive waste will be stored at least fifteen meters (50 feet) from the facility's property line.

**D-1d: Containers Without Free Liquids
OAC 3745-50-44 (C)(1)(b), 3745-55-75(C)**

USA Lamp & Ballast Recycling, Inc obtains recycling order forms, shipping papers and/or waste manifests describing the wastes prior to acceptance and maintains a file of MSDS Sheets which document the absence of free liquids. USA Lamp & Ballast Recycling, Inc conducts visual inspections of containers in the storage area to verify the absence of free liquids and to safeguard against contamination of the lamps from batteries or lighting ballasts. USA Lamp & Ballast Recycling has procedures in place and proper equipment for any necessary clean-up and re-containerization of leaking batteries and/or lighting ballast.

The containers are all covered by a roof and its accompanying gutter system, which provides protection from precipitation.

Containers are protected from any liquids which might accidentally accumulate on the floors of the facility as they are stored on raised pallets.

USA Lamp & Ballast does not accept containers which contain waste codes F020, F021, F022, F023, F026 and F027.

**D-1e: Containers With Free Liquids
OAC 3745-50-44 (C)(1)(b), 3745-55-75(C)**

USA Lamp & Ballast Recycling, Inc does not accept Free Liquids; therefore this section is not applicable. If USA Lamp & Ballast Recycling, Inc were to accept free liquids, we would comply with OAC 3745-50-44 (C)(1)(b), and 3745-55-75(C)

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section D Container Storage and Containment Building

D-2: TANK SYSTEMS

**OAC 3745-50-10, 3745-50-44 (C)(2), 3745-55-90, 3745-55-91, 3745-55-92(A),(B),(F)
3745-55-93, 3745-55-95, 3745-55-98, 3745-55-99**

USA Lamp & Ballast Recycling, Inc does not have a Tank System; therefore this section is not applicable. If USA Lamp & Ballast Recycling, Inc were to install a Tank System, we would comply with OAC 3745-50-10, 3745-50-44 (C)(2), 3745-55-90, 3745-55-91, 3745-55-92(A),(B),(F), 3745-55-93, 3745-55-95, 3745-55-98 and 3745-55-99 along with OSWER Policy Directive Nos. 9483.00-1, 9483.00-3, EPA/530-SW-86-044, and EPA 40 CFR Parts 260 to 271.

D-3: CONTAINMENT BUILDINGS

D-3a: Design Standards

D-3a(1) Structural Design Standards

OAC 3745-54-100 (A) & (B), 3745-205-101 (A) (1)-(4)

This Section does not apply to the USA Lamp & Ballast facility. If this changes in the future, USA Lamp & Ballast Recycling, Inc will comply with OAC 3745-54-100 (A) & (B), 3745-205-101 (A) (1)-(4).

D-3a(2) Free Liquid Management

OAC 3745-54-100 (C), 3745-205-101 (B)

USA Lamp & Ballast Recycling, Inc does not accept Free Liquids. If USA Lamp & Ballast Recycling, Inc accepts Free Liquids in the future, we will comply with OAC 3745-54-100 (C), 3745-205-101 (B).

D-3b(1) Emissions Controls, Containment, and Operating Standards

OAC 3745-205-100 (D) & (E), 3745-205-101 (C) & (D)

This section does not apply to USA Lamp & Ballast Recycling, Inc. If this changes in the future, USA Lamp & Ballast Recycling, Inc will comply with OAC 3745-205-100 (D) & (E), 3745-205-101 (C) & (D).

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Section D Container Storage and Containment Building

D-3c(1) Waiver From Secondary Containment Requirements
OAC 3745-205-101 (E)

This Section does not apply to the USA Lamp & Ballast Recycling, Inc facility. If USA Lamp & Ballast Recycling, Inc were to request a waiver from the secondary containment requirements in the future, we would comply with OAC 3745-205-101 (E).

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Section E Omitted**

SECTION E

This Section has been omitted by the OHIO EPA and has been purposefully left blank.

**USA Lamp & Ballast Recycling, Inc - Part B Permit
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Section F Procedures to Prevent Hazards**

SECTION F

F-1: SECURITY

This Section Addresses Procedures to Prevent Hazards and will address general security provisions, inspection schedule, preparedness and prevention of spills, and personnel protection equipment.

The following summarizes the security procedures put in place by USA Lamp & Ballast Recycling, Inc for the security of their personnel and the general public.

**F-1a: Waiver
OAC 3745-50-44 (A)(4), 3745-54-14 (A)**

Not Applicable; USA Lamp & Ballast Recycling, Inc does not request a waiver. If USA Lamp & Ballast Recycling, Inc were to request a waiver, we would comply with OAC 3745-50-44 (A)(4), 3745-54-14 (A).

**F-1a(1) Injury to Intruder
OAC 3745-54-14 (A)(1)**

Not Applicable; USA Lamp & Ballast Recycling, Inc does not request a waiver. If USA Lamp & Ballast Recycling, Inc were to request a waiver, we would comply with OAC 3745-50-44 (A)(1).

**F-1a(2) Violation Caused by an Intruder
OAC 3745-54-14 (A)(2)**

Not Applicable; USA Lamp & Ballast Recycling, Inc does not request a waiver. If USA Lamp & Ballast Recycling, Inc were to request a waiver, we would comply with OAC 3745-50-44 (A)(2).

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Section F Procedures to Prevent Hazards

F-1b: Security Procedures and Equipment
OAC 3745-50-44 (A)(4), 3745-54-14 (B)

The following sections detail Security Procedures and Equipment at the USA Lamp & Ballast Recycling, Inc Facility.

F-1b(1) 24-Hour Surveillance System
OAC 3745-54-14 (B)(1)

Per Section B-2a(3) of this application, access to the building is monitored by employees during business hours. Doors not in use during business hours are kept locked. All doors are securely locked, and the security system armed when the facility is closed.

F-1b(2) Barrier
OAC 3745-54-14 (B)(2)(a)

The USA Lamp & Ballast Recycling, Inc Contingency Plan (Appendix B) details the Barriers and Means to Control Entry to the facility.

F-1b(3) Means to Control Entry
OAC 3745-54-14 (B)(2)(b)

The USA Lamp & Ballast Recycling, Inc Contingency Plan (Appendix B) details the Barriers and Means to Control Entry to the facility.

F-1c: Warning Signs
OAC 3745-54-14 (C)

The USA Lamp & Ballast Recycling, Inc Contingency Plan (Appendix B) details the warning signs posted in and around the plant.

F-2: INSPECTION SCHEDULE

F-2a: General Inspection Requirements
OAC 3745-50-44 (A)(5), 3745-54-15 (A), (B)(1) & (B)(2), 3745-54-33

USA Lamp & Ballast conducts regular inspections (performs daily checks and documents weekly and / or monthly in inspection log(s)) of the facility for equipment

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section F Procedures to Prevent Hazards

malfunctions, structural deterioration, operator performance, and discharges that could cause or lead to the release of hazardous waste 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.

USA Lamp & Ballast Recycling, Inc conducts visual monitoring and checks for equipment malfunctions, structural deterioration, and operator performance daily during the regular course of operations and completes and maintains weekly and monthly signed and dated inspection forms in an inspection log for future reference and for regulatory agency inspections. Documentation of any corrective actions taken is maintained in the inspection log and the inspection logs are maintained at the facility for a minimum of three (3) years. Inspection schedule and logs are contained in Exhibit 3.

**F-2a(1) Types of Problems
OAC 3745-54-15 (B)(3)**

USA Lamp & Ballast Recycling looks for the following types of problems within the facility on a daily basis during normal operations:

- Crushed or broken boxes entering the facility;
- Drums which are rusted or dented, or have holes in them;
- Boxes or drums which are leaking incoming materials;
- Other damaged containers which may be used to ship materials to the facility;
- Damaged or malfunctioning pallet handling equipment;
- Other malfunctioning lamp and ballast handling equipment;
- Lamp processing machine malfunctions;
- Structural damage;
- Security breaches;
- Safety and emergency equipment
- Alarm system / security devices
- Jerome Meter;
- Loading and Unloading areas free of spills / leaks;
- Any potentially unsafe workplace conditions;

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Section F Procedures to Prevent Hazards

F-2a(2) Frequency of Inspections
OAC 3745-54-15 (B)(4)

USA Lamp & Ballast Recycling's Contingency Plan (Appendix B) specifies the frequency of inspection for the container storage portion of the plant.

F-2a(3) Remedial Action
OAC 3745-54-15 (C)

USA Lamp & Ballast Recycling's Contingency Plan specifies the Remedial Actions for incidents in their Contingency Plan, which is included as Appendix B. Any deterioration or malfunction of equipment or structures revealed by inspections will be remedied in time to prevent an environmental or human health hazard.

F-2a(4) Inspection Logs
OAC 3745-54-14 (D)

USA Lamp & Ballast Recycling, Inc keeps facility and health and safety logs and facility inspection logs and remedial action logs as detailed in the Contingency Plan, which is included as Appendix B. Examples of the Inspection Logs are located in Exhibit 3.

F-2b: Specific Process Unit Inspections

Process units are visually inspected by facility employees on a daily basis.

F-2b(1) Container Inspections
OAC 3745-50-44 (A)(5), 3745-55-74

USA Lamp & Ballast Recycling, Inc inspects all containers for leaks or damage as they come into the facility. All containers, containment systems and container storage areas are inspected weekly for leaks, spills and deterioration caused by corrosion or other factors. Additional inspection requirements are detailed in the USA Lamp & Ballast Recycling, Inc Contingency Plan included as Appendix B. Examples of the Inspection Forms are contained in Exhibit 3.

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Section F Procedures to Prevent Hazards

F-2b(2) Tank System Inspections
OAC 3745-50-44 (A)(5), 3745-55-95

USA Lamp & Ballast Recycling does not have a Tank System; therefore this section is not applicable. If USA Lamp & Ballast Recycling, Inc were to install a Tank System, we would comply with OAC 3745-50-44 (A) (5), 3745-55-95.

F-2b(3) Surface Impoundment Inspections
OAC 3745-50-44 (A)(5), 3745-56-26 (A) & (B)

USA Lamp & Ballast Recycling, Inc does not have Surface Impoundments; therefore this section is not applicable. If USA Lamp & Ballast Recycling, Inc were to install Surface Impoundments, we would comply with OAC 3745-50-44 (A) (5), 3745-56-26 (A) & (B).

F-2b(4) Waste Pile Inspections
OAC 3745-50-44 (A)(5), 3745-56-54

USA Lamp & Ballast Recycling, Inc does not have Waste Piles; therefore this section is not applicable. If USA Lamp & Ballast Recycling, Inc were to install Waste Piles, we would comply with OAC 3745-50-44 (A)(5), 3745-56-54.

F-2b(5) Land Treatment Unit Inspections
OAC 3745-50-44 (A)(5), 3745-56-73 (G)

USA Lamp & Ballast Recycling, Inc does not have Land Treatment Units; therefore this section is not applicable. If USA Lamp & Ballast Recycling, Inc were to have Land Treatment Units, we would comply with OAC 3745-50-44 (A)(5), 3745-56-73 (G).

F-2b(6) Landfill Inspections
OAC 3745-50-44 (A)(5), 3745-57-05

USA Lamp & Ballast Recycling, Inc does not operate a landfill; therefore this section is not applicable. If USA Lamp & Ballast Recycling, Inc were to operate a landfill, we would comply with OAC 3745-50-44 (A)(5), 3745-57-05.

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Section F Procedures to Prevent Hazards

F-2b(7) Incinerator Inspections
OAC 3745-57-47

USA Lamp & Ballast Recycling, Inc does not operate an incinerator; therefore this section is not applicable. If USA Lamp & Ballast Recycling, Inc were to operate an incinerator, we would comply with OAC 3745-57-47.

F-2b(8) Miscellaneous Unit Inspections
OAC 3745-50-44 (A)(5), 3745-57-92

USA Lamp & Ballast Recycling, Inc does not operate miscellaneous units; therefore this section is not applicable. If USA Lamp & Ballast Recycling, Inc were to operate miscellaneous units, we would comply with OAC 3745-50-44 (A)(5), 3745-57-92.

F-3: Exemption from or Documentation of Preparedness & Prevention Requirements
OAC 3745-50-44 (A)(6), 3745-54-30 to 3745-54-37

USA Lamp & Ballast Recycling, Inc does not request an exemption from Preparedness and Prevention Requirements. If USA Lamp & Ballast Recycling, Inc were to request an exemption from Preparedness and Prevention Requirements, we would comply with OAC 3745-50-44 (A)(6), 3745-54-30 to 3745-54-37.

F-3a: Justification for Exemption Request
OAC 3745-50-44 (A)(6)

USA Lamp & Ballast Recycling, Inc does not request an exemption from Preparedness and Prevention Requirements. If USA Lamp & Ballast Recycling, Inc were to request an exemption from Preparedness and Prevention Requirements, we would do so per OAC 3745-50-44 (A)(6).

F-3b: Design and Operation of Facility
OAC 3745-54-31

The facility is designed, constructed, maintained and operated to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of waste constituents which could threaten human health or the environment. Details

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section F Procedures to Prevent Hazards

for prevention of hazards are presented in the USA Lamp & Ballast Recycling, Inc's Contingency Plan which is included as Appendix B.

F-3c: Equipment Requirements
OAC 3745-54-32

F-3c(1) Internal Communications
OAC 3745-54-32 (A)

The facility has a telephone / paging system with capabilities of notifying facility personnel and 911 in the event of an emergency. There is continual video monitoring of the lamp processing area, storage area, north receiving area and front entrance. Typically, two employees work together in the lamp processing area and there is always video monitoring of the area.

F-3c(2) External Communications
OAC 3745-54-32 (B)

A telephone system is present on-site with phones located in the office area and a telephone located in the operations area by the north wall next to the walk-thru entrance. Additionally, all drivers and the Facility Manager carry mobile phones. A buzzer is located in the lamp processing room which can be used to alert personnel in the warehouse area and / or office area in the event of an emergency.

F-3c(3) Emergency Equipment
OAC 3745-54-32 (C)

In the event of an emergency, the facility has fire extinguishers, a first aid kit, spill control / decontamination equipment, personal protection equipment, and mercury vapor detection equipment available for the protection of the personnel, facility and the environment. A list of the Emergency Equipment is included as Attachment 56 to the Contingency Plan. A map (Attachment 7) of the location of emergency equipment, and evacuation routes from the plant is included in the USA Lamp & Ballast Recycling, Inc Contingency Plan, which is included as Appendix B.

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Section F Procedures to Prevent Hazards

**F-3c(4) Water for Fire Control
OAC 3745-54-32 (D)**

Water for fire control is provided by a municipal fire hydrant located on the south end of the facility.

**F-3d: Access to Communications or Alarm System
OAC 3745-54-34**

All personnel who handle or process any material in the regulated storage areas and processing area will have immediate access to the telephone / intercom system through either visual or verbal contact with another employee. The facility has public address system capabilities in the event of an emergency and there is continual video monitoring of the lamp processing area, storage area, north receiving area and front entrance. A buzzer is located in the lamp processing room which can be used to alert personnel in the warehouse area and / or office area in the event of an emergency. The Contingency Plan specifies that in the event of an emergency, the Safety Officer will notify all personnel by public address, intercom, or in person.

**F-3e: Aisle Space Requirement
OAC 3745-54-35**

USA Lamp & Ballast Recycling, Inc maintains 24 inches (2 feet) of aisle space which is sufficient for unobstructed movement of personnel, fire equipment, decontamination equipment and spill control equipment to any area of the facility operation in the case of an emergency. The storage area is well lighted and kept clean, neat and orderly. Aisles and passageways necessary for unobstructed movement of personnel and equipment are always maintained.

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Section F Procedures to Prevent Hazards

F-3f: Arrangements / Agreements with Local Authorities
OAC 3745-54-37

**F-3f(1) Arrangements with Police, Fire Departments and Emergency
Response Teams**
OAC-3745-54-37 (A)(1)

The Cincinnati Police Department is available to direct traffic, handle crowds, and provide security services. The Cincinnati Police Department has a copy of the USA Lamp & Ballast Contingency Plan (Appendix B).

The Cincinnati Fire Department will respond to fires and other emergency incidents providing fire protection and rescue services. The Cincinnati Fire Department has a copy of the USA Lamp & Ballast Contingency Plan (Appendix B).

F-3f(2) Primary Emergency Authority
OAC 3745-54-37 (A)(2)

The Cincinnati Fire Department is the responding authority in the event of a fire at the facility. The Cincinnati Fire Department has full authority as soon as they arrive at the site.

F-3f(3) Arrangements with the Ohio EPA
OAC 3745-54-37 (A)(3)

The Ohio EPA Emergency Response is available if necessary for emergency response and has a copy of our Contingency Plan.

F-3f(4) Arrangements with Local Hospitals
OAC 3745-54-37 (A)(4)

The Good Samaritan Hospital is available to provide medical services. The hospital has a copy of the USA Lamp & Ballast Recycling, Inc Contingency Plan.

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Section F Procedures to Prevent Hazards

F-3f(4) Documenting Refusals
OAC 3745-54-37 (B)

USA Lamp & Ballast Recycling, Inc has not received any refusal of authorities to enter into emergency arrangements / agreements, and will notify the OH EPA should any such refusal be encountered.

F-4: PREVENTATIVE PROCEDURES, STRUCTURES, AND EQUIPMENT
OAC 3745-50-44 (A)(8)

F-4a: Unloading Operations
OAC 3745-50-44 (A)(8)(a)

All incoming material is identified and matched up with the shipping documents while unloading and prior moving to the storage areas. USA Lamp & Ballast Recycling, Inc unloads the vehicles via hand or utilizes forklifts with drum attachments, drum dollies and pallet jacks to prevent damage / hazards to containers and employees.

F-4b: Run-off
OAC 3745-50-44 (A)(8)(b)

USA Lamp & Ballast Recycling, Inc completes all waste handling inside the facility, or under a roof; therefore, there is no run-off to other areas of the facility or the environment. Any spills or leaked material are immediately cleaned up and leaking containers are properly overpacked in appropriately marked non-leaking containers. Any sorbents or residues from the spill cleanup are disposed of properly.

F-4c: Water Supplies
OAC 3745-50-44 (A)(8)(c)

The facility does not have any interior drains and there are not any water supplies or wells nearby.

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Section F Procedures to Prevent Hazards

F-4d: Equipment and Power Failure
OAC 3745-50-44 (A)(8)(d)

In the event of a power failure at the plant, all employees are trained to move to exits unless there is a storm. In that event, employees will move to the stock fibre drum area. No generator is available at the facility. A power failure would not jeopardize the integrity of the facility or the ability to protect the storage area. The local utility company would be notified as soon as possible in the event of a power outage.

F-4e: Personnel Protection Equipment
OAC 3745-50-44 (A)(8)(e)

USA Lamp & Ballast Recycling, Inc describes the personal protective equipment (PPE) needed in its Contingency Plan, included as Appendix B and Attachment 6⁵.

F-5: PREVENTATION OF REACTION OF IGNITABLE, REACTIVE AND INCOMPATIBLE WASTES
OAC 3745-50-44 (A)(9), (C)(1)(c), (C)(1)(d), (C)(2)(j), (C)(3)(g)&(h), (C)(4)(f), (C)(4)(g), (C)(5)(g)&(h), (C)(7)(f), (C)(7)(g), 3745-54-17 (A), (B), (C), 3745-55-76, 3745-55-77, 3745-55-98, 3745-55-99, 3745-56-29, 3745-56-30, 3745-56-56, 3745-56-57, 3745-56-81, 3745-56-82, 3745-57-12, 3745-57-13

USA Lamp & Ballast Recycling, Inc does not handle reactive, ignitable or incompatible wastes; therefore this Section does not apply. If USA Lamp & Ballast Recycling, Inc were to handle reactive, ignitable or incompatible wastes, we would comply with the rules listed above.

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Section G CONTINGENCY PLAN GENERAL INFORMATION

SECTION G

G CONTINGENCY PLAN

OAC 3745-54-51, 3745-54-52(B) or 3745-65-51, 3745-65-52(B)

USA Lamp & Ballast Recycling, Inc's Contingency Plan, prepared according to OAC 3745-54-51, 3745-54-52(B) or 3745-65-51, 3745-65-52(B) is attached as Appendix B and includes Attachments 1 – 8 and Exhibits 1 - 3.

G-1a: Floodplains

OAC 3745-54-18(B)

USA Lamp & Ballast Recycling, Inc is not located on a one-hundred-year floodplain; therefore this section is not applicable. A flood plain map is attached as Figure 4. If this information were to change, USA Lamp & Ballast Recycling, Inc would comply with OAC 3745-54-18(B).

G-1b: General Information

OAC 3745-54-52

USA Lamp & Ballast Recycling, Inc's Contingency Plan (Appendix B) contains General Information on the facility.

G-2: EMERGENCY COORDINATORS

OAC 3745-54-52(D), 3745-54-55

USA Lamp & Ballast Recycling, Inc's Contingency Plan (Appendix B) and Attachment 2 contain information on the Emergency Coordinators.

G-3 IMPLEMENTATION

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

USA Lamp & Ballast Recycling, Inc's Contingency Plan (Appendix B) contains details implementation requirements and responsibilities.

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Section G CONTINGENCY PLAN GENERAL INFORMATION

G-4 EMERGENCY RESPONSE PROCEDURES

The Emergency Response Plan contained in Appendix B describes the methodology for immediate notification of facility personnel.

**G-4a: Notification
OAC 3745-54-56 (A) & (D)**

The USA Lamp & Ballast Contingency Plan, Appendix B of this document, details notification requirements and responsibilities in the event of an emergency.

**G-4b: Identification of Hazardous Materials
OAC 3745-54-56 (B)**

Hazardous materials are identified per the Contingency Plan found in Appendix B.

**G-4c: Assessment
OAC 3745-54-56 (C) & (D)**

The Emergency Response Plan contained in Appendix B describes the procedures necessary to follow in the event of a fire with or without injury to plant personnel, in the event of a release, explosion, in response to the release of gases or materials used to contain or control fire and released materials. Additionally, the Emergency Response Plan describes the criteria for plant evacuation, and procedures for evacuation.

**G-4d: Control Procedures
OAC 3745-54-52 (A)**

The USA Lamp & Ballast Recycling, Inc Emergency Response Plan (Appendix B) contains control procedures to be carried out in the event of a fire, release, or explosion.

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Section G CONTINGENCY PLAN GENERAL INFORMATION

**G-4e: Prevention of Recurrence or Spread of Fires, Explosions, or Releases
OAC 3745-54-56 (E) & (F)**

USA Lamp & Ballast Recycling Inc.'s Emergency Response Plan (Appendix B) describes the procedures used to prevent the recurrence of fires and releases. The facility's Emergency Response Plan details the steps necessary to take to ensure that the fire or release do not spread to another portion of the plant or to other hazardous material at the plant.

**G-4f: Storage and Treatment of Released Material
OAC 3745-54-56 (G)**

USA Lamp & Ballast details its cleanup procedures for released material in its Emergency Response Plan. Materials recovered from releases will be tested and sent to the appropriate destination facility for treatment or disposal per OAC 3745-54-56 (G). The USA Lamp & Ballast Contingency Plan details the procedures for storage and treatment of released materials.

**G-4g: Incompatible Waste
OAC 3745-54-56 (H)(1)**

USA Lamp & Ballast does not handle incompatible wastes; therefore this section is not applicable. If USA Lamp & Ballast Recycling, Inc were to handle incompatible wastes, we would comply with OAC 3745-54-56 (H)(1).

**G-4h: Post-Emergency Equipment Maintenance
OAC 3745-54-56 (H)(2)**

The USA Lamp & Ballast Contingency Plan details the personnel responsible for Post-Emergency Equipment Maintenance.

**G-4i: Container Spills and Leakage
OAC 3745-54-52, 3745-54-56 (G), 3745-55-71**

The USA Lamp & Ballast Contingency Plan (Appendix B) details the procedures to identify and respond to container spills and leakage.

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Section G CONTINGENCY PLAN GENERAL INFORMATION

G-4j: Tank Spills and Leakage

OAC 3745-54-56 (I), 3745-55-94 (C), 3745-55-96 (A), (B), (C), (D)(1) & (2), (E) & (F)

USA Lamp & Ballast Recycling, Inc does not have a Tank System; therefore this section is not applicable. If USA Lamp & Ballast Recycling, Inc were to install a Tank System, we would comply with OAC 3745-54-56 (I), 3745-55-94 (C), 3745-55-96 (A), (B), (C), (D)(1) & (2), (E) & (F).

G-4k: Surface Impounds Spills and Leakage

OAC 3745-56-27 (A), (B), (D)(1) & (2), 3745-56-26 (C)

USA Lamp & Ballast Recycling, Inc does not have a Surface Impound; therefore this section is not applicable. If USA Lamp & Ballast Recycling, Inc were to install surface impounds, we would comply with OAC 3745-56-27 (A), (B), (D)(1) & (2), 3745-56-26 (C).

G-5 EMERGENCY EQUIPMENT
OAC 3745-54-52 (E)

USA Lamp & Ballast keeps a list of all emergency and decontamination equipment in its Emergency Response Plan (Appendix B and Attachment 6).

G-6 COORDINATION AGREEMENTS
OAC 3745-54-52 (C), 3745-54-37

USA Lamp & Ballast details its Police Department, Fire Department, local hospital, and OHEPA agreements and notification procedures in its Contingency Plan, contained in Appendix B and Attachments 7 & 8.

G-7 EVACUATION PLAN
OAC 3745-54-52 (F)

USA Lamp & Ballast details its evacuation plan including signals / announcements of evacuations, and evacuation routes in its Contingency Plan (Appendix B & Exhibit 1).

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Section G CONTINGENCY PLAN GENERAL INFORMATION

**G-8 REQUIRED REPORTS
OAC 3745-54-56 (J)**

The USA Lamp & Ballast Contingency Plan (Appendix B & Attachments 4 and 5) contains the reports required by state and local authorities in the event of an emergency.

**G-9 COPIES OF CONTINGENCY PLAN
OAC 3745-54-53**

USA Lamp & Ballast maintains copies of its Contingency Plan in its facility and copies are on file with local Police and Fire Departments, OH EPA and at the local hospital.

**G-10 AMENDMENT OF 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's hazardous waste permit is revised.
- 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 waste or hazardous waste constituents, or changes in the response necessary in any emergency.
- When a change is required by the director.
- The list of emergency coordinators change.
- The list of emergency equipment change.

HAZARDOUS WASTE CONTINGENCY PLAN AND EMERGENCY PROCEDURES

USA LAMP & BALLAST RECYCLING, INC

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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 and all employees involved in handling such materials are required to carry out the proceedings and precautions included herein.

Thomas M Kimmel
President

Michael T Kimmel
Senior Vice President

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ATTACHMENTS

1. WASTE CHARACTERISTICS TABLE
2. EMERGENCY RESPONSE COORDINATORS
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4. REPORTING FORM FOR EMERGENCY EVENTS
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EXHIBITS

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2. TOPOGRAPHIC MAP
3. INSPECTION REPORTS

1.0 GENERAL INFORMATION (OAC 3745-54-52)

1.1 Facility Name and Location

This manual is applicable to USA Lamp & Ballast Recycling, Inc. The specific location and mailing address of this facility are:

Specific Location

7806 Anthony Wayne Ave
Cincinnati, OH 45216

Mailing Address

7806 Anthony Wayne Ave
Cincinnati, OH 45216

The general facility telephone, fax and email address are:

513.641.4155 phone, 513.641.4156 fax, usalamp@usalamp.com email

The Facility is owned by:

USA Lamp & Ballast Recycling, Inc
7806 Anthony Wayne Avenue
Cincinnati, OH 45216

The Facility is operated by:

USA Lamp & Ballast Recycling, Inc
7806 Anthony Wayne Avenue
Cincinnati, OH 45216

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

Latitude: 39 degrees, 12 minutes, 02 seconds North
Longitude: 84 degrees, 28 minutes, 20 seconds West

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

The facility NAICS Codes: 56200 and 33511

1.2 Facility Operations

USA Lamp & Ballast Recycling, Inc collects universal waste lamps, batteries and mercury-containing devices, residuals, debris and mercury liquids along with lighting ballast and fixtures, and computer / electronic equipment for processing to make it more amenable to be recycled. The items are basically sorted, disassembled and repackaged to be sent to final destination facility. The facility crushes fluorescent lamps and separates the components for recycling. Mercury is reclaimed on-site utilizing a mercury retort.

The facility also temporarily stores fluorescent light ballasts (small capacitors), universal waste mercury-containing equipment per US EPA 40 CFR Parts 260, 261, 264, 265, 268, 270 and 273 along with computers and electronics. The lamps are stored in original manufacturer's boxes, manufactured boxes, gaylord and other manufactured containers. The ballast and batteries are stored in drums, pails, gaylord containers or on wooden pallets. Mercury is stored in drums, pails or lined

containers. The computer / electronic equipment are stored in gaylord boxes or on wooden pallets. The items are basically sorted, disassembled and repackaged to be sent to final destination facility. USA Lamp & Ballast works with various Recyclers to achieve proper recycling of these items. USA Lamp & Ballast reserves the right to remove the mercury ampules from mercury-containing devices according to all applicable rules and regulations.

The facility is licensed for the transportation of hazardous wastes.

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 is listed as a Generator of hazardous waste under Subtitle C of RCRA, and therefore, is required to have a Hazardous Waste Contingency Plan. Also, OAC rules 3745-54-51(A) and 3745-65-51 (A) and 3745-52-34(A)(4) require a contingency plan for TSD facilities and LQG. This Contingency Plan defines mandatory reporting and other 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 hazardous releases are obligatory regardless of the quantities involved and whether or not 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 facility.

3.0 IDENTIFICATION OF HAZARDOUS MATERIALS OAC 3745-54-56 (B)

The universal/hazardous waste being stored is hazardous due to corrosivity, toxicity and/or it is a listed hazardous waste. **Attachment 1** provides a detailed list of all

universal/hazardous waste stored at the USA Lamp & Ballast Recycling 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 Cincinnati Fire Department is the responding authority in the event of a fire at the facility. The Cincinnati Fire Department has full authority as soon as they arrive at the site.

The Primary Emergency Coordinator along with the Corporate Safety & Compliance Officer is 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 and 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 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 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 toxic fumes.
- Could ignite hazardous materials.
- Could spread off-site.
- Require use of water or fire suppressant resulting in contaminated run-off.
- Could release hazardous waste.
- 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 main entrance to Hamilton County Fair Ground facility Anthony Wayne Avenue.
- 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 material has occurred or is imminent.
- 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 lie 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 by telephone or internal communication 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 or leak, material involved and source.
 - 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.

- ii. 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 Cincinnati Fire Department is the responding authority in the event of a fire at the facility. The Cincinnati 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 main entrance to the Hamilton County Fair Ground facing Anthony Wayne Avenue. 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 & Ballast personnel can handle the correction action and clean-up. A list of the emergency equipment is found under **Attachment 6**.
8. If USA Lamp & Ballast 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 can not be controlled through the use of portable fire extinguishers and explosions the Emergency Coordinator must make the necessary reports as outlined in **Attachments 4 and 5**.

8.3.2 **SPILLS**

OAC 3745-65-52

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

1. An alarm will be sounded by telephone or internal communication 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.
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 or leak, material involved and source
 - Typed of material that has spilled or is leaking
 - The approximate amount of material spilled, an estimate of the liquid discharge rate and direction of liquid flow.
4. The Emergency Coordinator must evaluate the facility's emergency response equipment to determine if USA Lamp & Ballast 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 & Ballast 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.

- 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 & Ballast 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 measure 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 hazardous material at the facility.

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.

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.

Rinseates from equipment decontamination will be collected in containers. The rinseates which contacted hazardous material and the resulting residue will be managed as a hazardous waste unless laboratory results indicate otherwise. Other rinseates 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.

ISSA I AMP & RAI I AST RECYCLING INC

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 Cincinnati Fire Department is the responding authority in the event of an emergency at the USA Lamp & Ballast Recycling 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 & Ballast will document any refusals to enter into a coordination agreement.

USA Lamp & Ballast Recycling 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 facility paging system and telephone. 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 plan will be noted in the operating record of the facility.

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's hazardous waste permit is revised.
- 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 waste or hazardous waste constituents, or changes in the response necessary in any emergency.
- When a change is required by the director.
- The list of emergency coordinators change.
- The list of emergency equipment change.

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 with gated control and a security alarm system. The facility telephone system allows for communication outside the facility and has internal telephones for communication between the offices and operations area along with a paging system which allows the offices to alert recycling operations employees. The telephones are immediately available to summon emergency assistance. There is a telephone located in the operations area by the north wall next to the walk-thru entrance along with phones located in the office areas. There is continual video monitoring of the lamp processing area, storage area, north receiving area and front entrance. Typically, two employees work together in the lamp processing area and there is always video monitoring. Visitors

and contractors entering the building must present themselves to the front office receptionist and receive permission prior to entering the recycling operation areas.

14.2 Surveillance System
OAC 3745-54-14 (B)(1)

Security at USA Lamp & Ballast Recycling is maintained by a security alarm system which is activated during non-working hours, 7 days a week. The north and south 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)

The facility property is gated to control entry onto the site property. Entrance inside the facility is controlled through an automated alarm system. Alarm keypads are located at the north and south entrances to 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

USA Lamp & Ballast 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 waste 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.

USA Lamp & Ballast Recycling, Inc conducts inspections on a daily basis and completes and maintains weekly and monthly signed and dated inspection forms at the facility for a minimum of three (3) years.

Drum Inspections are conducted every Monday while the Monthly Inspection is completed on the first Monday of the month.

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 & Ballast Recycling 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

- Fluorescent light fixtures, ballasts, batteries and mercury containing articles 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 fluorescent lights are stored in the lamp storage area, the lighting ballasts are stored in the lighting ballast storage area and the batteries and mercury containing articles are stored in the proper Universal Waste storage area.

LOADING

- Phosphor powder and glass and aluminum (non hazardous waste) are generated in the recycling operation. The phosphor powder is collected in 55-gallon drums and stored in the reclamation storage area. The powder is then moved to USA Lamp's on-site mercury retort for processing. The glass and aluminum are collected in roll-off containers and gaylord boxes respectively and stored in the appropriate storage areas. From these areas, the gaylord boxes are moved to the shipping dock and loaded for transport to other facilities. The roll-off containers are serviced by the proper disposal company.
- Lighting ballast are stored in the lighting ballast storage area in 55-gallon containers and then are moved to the shipping dock and loaded for transport to other facilities.
- Universal Batteries are stored in Universal Waste Batteries storage area in 55-gallon containers with poly-liners, 5-gallon poly-pails or on skids and then are moved to the shipping dock and loaded for transport to other facilities.
- Universal Waste Switches, Thermometers, Thermostats and Devices are stored in the Universal Waste Storage area in 55-gallon drums and then are moved to the retort area where they are separated into their constituent parts and the mercury reclaimed utilizing USA Lamp's on-site mercury retort.
- Several precautions have been taken to reduce the potential for hazards during unloading/loading operations. Aisle space is maintained at all times. The parking brake is secured during unloading/loading operations and the landing gear is down. Wheels will be chocked.

ATTACHMENT 1
USA LAMP & BALLAST RECYCLING, INC
Emergency Response Contingency Plan

List of Hazardous Materials

PCB Containing Materials

Mercury Containing Materials

Universal Waste Batteries

Mercury

ATTACHMENT 2
USA LAMP & BALLAST RECYCLING, INC
Emergency Response Contingency Plan

Emergency Response Coordinators

EMERGENCY COORDINATOR

TELEPHONE NUMBERS

PRIMARY

Timothy M Kimmel
2356 Park Avenue, Unit 63
Cincinnati, OH 45206

Business: (513)641-4155
Residence: (513)388-6872
Mobile: (513)388-6872

SECONDARY

Benjamin Boyll
4844 Bridge Lane, Apt 8
Mason, OH 45040

Business: (513)641-4155
Residence: (513)309-2288
Mobile: (513)309-2288

Timothy Finnerty
12155 Fieldsted Drive
Cincinnati, OH 45249

Business: (513)641-4155
Residence: (513)469-8880
Mobile: (513)616-5730

Manuel Soden
10283 Storm Drive
Cincinnati, OH 45251

Business: (513)641-4155
Residence: (513)699-0935
Mobile: None

Michael T Kimmel
729 Center Street
Mason, MI 48854

Business: (517)676-0044
Residence: (517)676-2639
Mobile: (517)204-7111

ATTACHMENT 3
USA LAMP & BALLAST RECYCLING, INC
Emergency Response Contingency Plan

EMERGENCY TELEPHONE LIST

EMERGENCY	ORGANIZATION / AGENCY	PHONE NUMBER
INJURY	Cincinnati Fire Dept	(513)352-2344 or 911
	Good Samaritan Hospital	(513)872-2536
	Poison Control Center	(513)558-5111
	Ambulance (Cincinnati Fire Dept)	(513)352-2344 or 911
FRE / EXPLOSION	Cincinnati Fire Dept, District 4	(513)352-2344 or 911
	Cincinnati Police Dept, District 4	(513) 569-8600 or 911
	24 Hour Dispatch	(513)765-1122
Hazardous Material	Cincinnati Fire Dept	(513)352-2344 or 911
	Ryan McEwan (interim), Cincinnati Fire Dept. (Environmental Crimes / Hazardous Materials)	(513)263-8016
Natural Disaster	American Red Cross	(513)579-3000
Spill / Release	Cincinnati Fire Dept	(513)352-2344 or 911
	OH EPA Emergency Response Team	(800)282-9378
	National Response Center	(800)424-8802
	Ryan McEwan (interim), Cincinnati Fire Dept (Environmental Crimes / Hazardous Materials)	(513) 263-8016
Security	Cincinnati Police Dept, District 4	(513)569-8600
	Broadview Security	(800)445-0872
Government Agencies (Informational contacts during regular business hours)	OH EPA Southwest District Office	(513)285-6357

ATTACHMENT 4
USA LAMP & BALLAST RECYCLING, INC
Emergency Response Contingency Plan

Reporting Form for Emergency Events

Name, address and telephone number of owner / operator

Name, address and telephone number of facility

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, Region V
Regional Administrator (EPA)
Chicago, IL 60604
2. Chief
Environmental Emergency Branch
US EPA, Region V
3. Director
OH EPA
Lazarus Government Building
PO Box 1049
Columbus, OH 43216-1049

ATTACHMENT 5
USA LAMP & BALLAST RECYCLING, INC
Emergency Response Contingency Plan

EMERGENCY EQUIPMENT

- PERSONNEL PROTECTIVE EQUIPMENT
 - Personal Protective Suits
 - Gloves for spills
 - NIOSH/MSHA approved half-face respirators
 - NIOSH/MSHA approved filter cartridges for metallic Hg vapor and chlorine gas
 - Safety Glasses
 - Goggles
 - Disposable coveralls
 - Hard Hats
 - Ear Protection
 - Industrial First Aid Kit and supplies
 - Fixed Eyewash Station
- FIRE RESPONSE EQUIPMENT
 - Portable Fire Extinguishers
 - Small hand held extinguishers are located throughout the building. (See Exhibit 3).
The extinguishers are inspected and refilled (if necessary) yearly.
- SPILL RESPONSE / DECONTAMINATION EQUIPMENT
 - Protective Coats
 - Protective Gloves
 - Protective Goggles
 - Soda Ash
 - Kitty litter
 - Vermiculite
 - Shop Vacuum with HEPA filters
 - Portable Mercury Analyzer – (Jerome Meter)
 - Empty 55-gallon open head drums
 - 85-gallon disposable (over pack) drums
 - Containment pallets
 - Shovels, brooms, buckets, mops
- COMMUNICATION EQUIPMENT
 - Telephone system in the office of the facility connected to outside lines
 - Telephone located near north end entrance and loading docks.
 - Telephone pager used inside the facility to communicate in the offices and facility.
 - Continuous video monitor located in the office with a camera in the lamping processing room and overlooking the storage area.

ATTACHMENT 6

USA LAMP & BALLAST RECYCLING, INC. - Emergency Response Contingency Plan

EMERGENCY EQUIPMENT

PERSONNEL PROTECTIVE EQUIPMENT	CAPABILITIES OF EQUIPMENT
Personal Protective Suits	Splash Protection
Gloves for spills	Hand Protection
NIOSH/MSHA approved half-face respirators	Respiratory Protection
NIOSH/MSHA approved filter cartridges for metallic Hg vapor and chlorine gas	Respiratory Protection
Safety Glasses	Eye Protection
Goggles	Eye Protection
Hard Hats	Head Protection
Ear Protection	Hearing Protection
Industrial First Aid Kit and supplies	Minor First Aid
Fixed Eyewash Station	Eye Protection
FIRE RESPONSE EQUIPMENT	
Portable Fire Extinguishers	Water Mist, Class A&C Clean Agent, Class A, B & C CO2, Class B & C Dry Chemical, Class A, B & C
Small hand held extinguishers are located throughout the building. (See Exhibit 3). The extinguishers are inspected and refilled (if necessary) yearly.	
SPILL RESPONSE / DECONTAMINATION EQUIPMENT	
Protective Coats	Splash Protection
Protective Gloves	Hand Protection
Protective Goggles	Eye Protection
Soda Ash	Neutralization and Absorption
Kitty litter	Absorption
Vermiculite	Absorption
Shop Vacuum with Particulate filters	
Portable Mercury Analyzer – (Jerome Meter)	Mercury Detection
Empty 55-gallon open head drums	
85-gallon disposable (over pack) drums	
Containment pallets	
Shovels, brooms, buckets, mops	
COMMUNICATION EQUIPMENT	
Telephone system in the office of the facility connected to outside lines	Communicate within and outside facility
Telephone located near north end entrance and loading docks.	Communicate within and outside facility
Telephone pager used inside the facility to communicate in the offices and facility.	Communicate within facility
Continuous video monitor located in the office with a camera in the lamping processing room and overlooking the storage area.	Monitor processing, storage and dock areas

ATTACHMENT 7
USA LAMP & BALLAST RECYCLING, INC
Emergency Response Contingency Plan

<u>PERSONNEL</u>	<u>DISTRIBUTION LIST</u> <u>TITLE</u>
Thomas M Kimmel	President, Owner
Michael Kimmel	GM, Operations Safety & Compliance Officer
Timothy M Kimmel	Vice President Facility Manager
Kyle Amann	Facility Manager
Ewan Blair	Retort Manager
Benny Coyt	EHS Manager
Larry Hizer	Warehouse Manager
Mark Amann	Technician/Driver Trainer
Brady Hobbs	Technician
Antony Montanez	Technician
Jaime Nieves	Technician
Roberto Rivera Gonzalez	Technician
Montsho Write	Technician
Jahde Wright	Technician
Mark Amann	Driver / Technician
Jevan Carthen	Driver / Technician
Donna Pechiney	Sales / Logistics
Al Sigman	Web, Media & Marketing
EMERGENCY	TITLE
Hospital	Good Samaritan Hospital
Fire / Environmental & Safety Services	Cincinnati Fire Department
Police Dept	Police Department, Cincinnati
OH EPA Emergency Response	

ATTACHMENT 8
USA LAMP & BALLAST RECYCLING, INC
Emergency Response Contingency Plan

SAMPLE DISTRIBUTION LETTER



Ohio AW Office
7806 Anthony Wayne Ave. Cincinnati, OH 45216
p. (513) 641-4155 | usasales@cleanlites.com

Mr. Ryan McEwan
Cincinnati Fire Department
700 W Pete Rose Way
Lobby B, 5th Floor
Cincinnati, OH 45203

Dear Mr. McEwan

USA Lamp & Ballast Recycling, Inc is a local Universal Waste facility that collects, sorts, disassembles and repackages lamps, batteries, lighting ballast, mercury-containing devices and computer / electronic equipment to be sent to the final destination facilities. As part of these operations, USA Lamp & Ballast Recycling generates and manages universal/hazardous waste. USA Lamp & Ballast Recycling, Inc requests your agreement to respond to emergencies at our facility, as appropriate for your function, upon request by USA Lamp & Ballast Recycling Facility personnel.

Enclosed for your information is a copy of the USA Lamp & Ballast Recycling Contingency Plan which can be used to familiarize your emergency response personnel with the layout of the facility, properties of the hazardous wastes handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to the facility and possible evacuation routes.

Please respond to this request in writing. A self-addressed return envelope is enclosed for your use.

If you should have any questions, please contact me at 513.851.3500 or timothy.kimmel@cleanlites.com.

Respectfully submitted,

Timothy M. Kimmel
Primary Emergency Coordinator
USA Lamp & Ballast Recycling, Inc

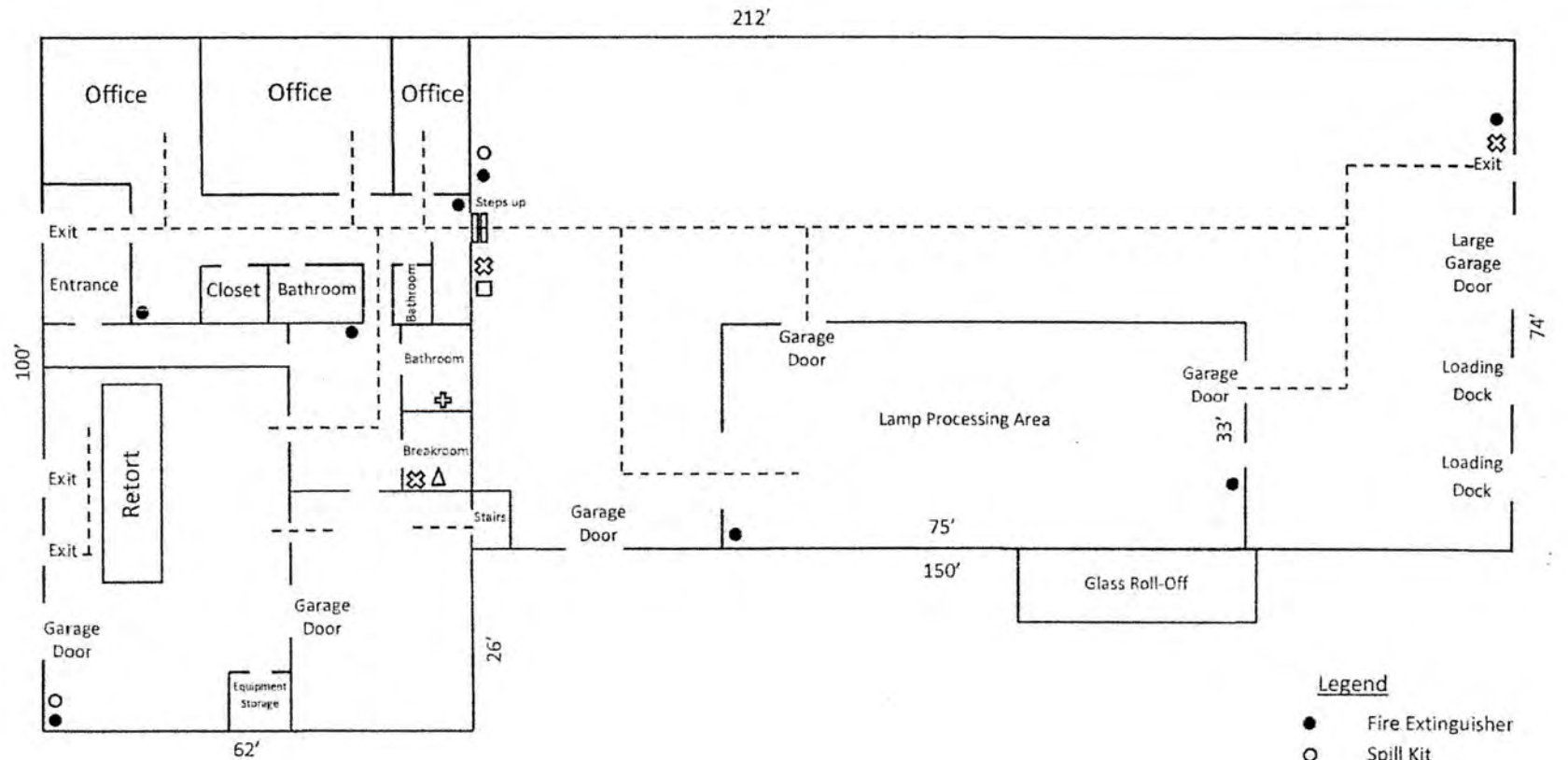
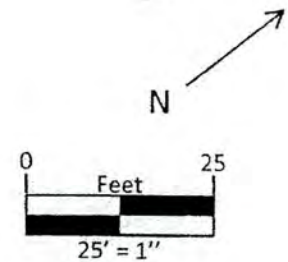
USA Lamp & Ballast Recycling, Inc Contingency Plan Receipt and Acknowledgement

Print / Type Name and Title

Signature

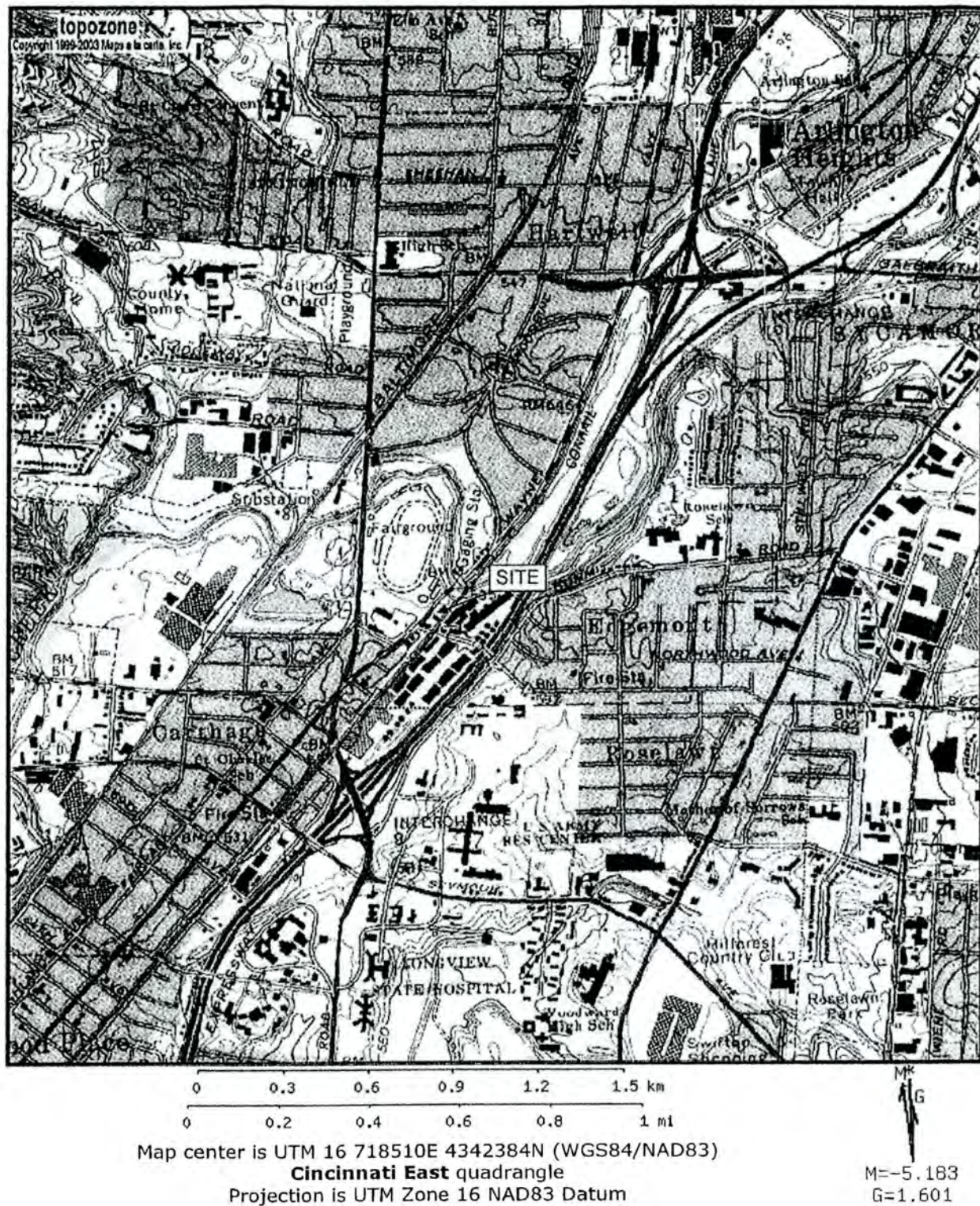
Date

EXHIBIT 1
 USA Lamp & Ballast Recycling, Inc.
 7806 Anthony Wayne Avenue
 Cincinnati, OH 45216
 513-641-4155
 EPA OHR 000 109 819



Legend

- Fire Extinguisher
- Spill Kit
- Eye Wash
- ⊠ First Aid Kit
- △ P.P.E.
- ⊕ Emergency Shower
- Emergency Exit Route

**FIGURE 1 - SITE LOCATION MAP**

USA LAMP & BALLAST
7808 ANTHONY WAYNE AVE
CINCINNATI, OH

PROJECT NO: 0509-020-P

DATE: 9/29/2005

SCALE:

DRAWN BY: AZ



Delta
Environmental
Consultants, Inc.

8008 Corporate Center Drive, Suite 100
Charlotte, North Carolina 28226

EXHIBIT 3

Date / Time _____

Signature: _____

**WEEKLY
DRUM INSPECTION FORM
OAC 3745-55-74**

1) Adequate Aisle Space (minimum 2ft) **YES** **NO**

Comments: _____

2) Containers Not Leaking **YES** **NO**

Comments: _____

3) Lids Free of Residue **YES** **NO**

Comments: _____

4) Containers Labeled Properly **YES** **NO**

Comments: _____

Last Ship Date: _____

Next Ship Date: _____

EXHIBIT 3

INSPECTION FORM

Date:

Inspector:

Initials:

HEALTH & SAFETY				
	Pass / Fail	Action Taken; i.e. Repair Replacement, Disciplinary	Service Completed	Service Personnel Initials
1. Personnel Protective Equipment				
a. Glasses				
b. Gloves				
c. Respirators				
2. Housekeeping				
a. Locker Area / Restrooms				
b. Floors (clean & clear)				
c. Aisle Spaces				
d. Drums				
e. Boxes				
f. Equipment				
g. Breakroom				
3. Safety Equipment				
a. Fire Extinguishers				
b. Eyewash / Shower				
c. Signs				
d. First Aid Station				
Security				
a. Overhead Doors				
b. Locks				
c. Alarm System				
5. Spill Equipment				
a. Spill Kits				
b. Mops				
c. Squeegees				
EQUIPMENT				
	Pass / Fail	Action Taken; i.e. Repair Replacement, Disciplinary	Service Completed	Service Personnel Initials
1. Process Equipment				
a. Lamp Machine				
b. Compressor				
c. Mercury Retort				
2. Material Handling Equipment				
a. Forklift				
b. Drum Truck				
c. Pallet Jacks				
3. Tools				
a. Hand Tools				
b. Cordless Tools				
c. Extension Cords				

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section H PERSONNEL TRAINING

SECTION H

H-1a: Outline of the Training Program
OAC 3745-50-44 (A)(12), 3745-54-16 (A)(1)

USA Lamp & Ballast Recycling provides introductory and continuing training programs to prepare personnel to operate or maintain the facility in a safe manner and to perform their duties in a way to ensure the facility's compliance with facility standards. The training program provides employees with an understanding of the safe handling of materials, potential safety hazards, practices for preventing discharges and procedures for responding to any hazardous material incident.

Training is designed to meet actual job tasks and ensure safe, proper and compliant work practices. Training techniques used are a combination of video presentations, written, tests, self-study with worksheets, supervised on-the job training and practical demonstration.

Attachment A shows a summary of employee training and frequency while Attachment B shows the checklist that is maintained in the employee files.

H-1b: Training Director
OAC 3745-54-16 (A)(2)

The Safety and Compliance Officer acts as the corporate training director and is trained in hazardous waste operations and emergency response per OSHA regulations – 29CFE1910.120 (c) (7) (e).

H-1c: Relevance of Training to Job Position
OAC 3745-54-16 (A)(2)

The training program is tiered in some areas to provide training to personnel at levels that are relevant to their positions with the plant. For example, the facility manager receives additional training in record-keeping and other procedures required for compliance, whereas technicians do not. Technicians are more specifically trained to maintain proper and safe operating procedures of equipment and how to respond

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section H PERSONNEL TRAINING

effectively in the event of a spill or other emergency. All personnel receive initial and annual training in evacuation procedures and the contingency plan.

H-1d: Emergency Response Training OAC 3745-54-16 (A)(3)

The training program is designed to cover all of the proper responses to emergency situations to ensure compliance with regulations under normal and emergency conditions. Facility personnel receive detailed training on the Contingency / Emergency Response Plan, found in Appendix B of this Part B Permit Application.

H-2: IMPLEMENTATION OF TRAINING PROGRAM OAC 3745-54-16 (B)

The Safety / Compliance Officer and all current waste handling personnel have been trained. New personnel will complete training within ninety (90) days of the date of their employment (orientation period) and employees who transfer to new positions will be trained within 90 days. Employees will not work unsupervised until they have completed the training requirements. Attachment B shows a sample training checklist that is maintained in the employee files which includes the employee's start date and dates required training is completed.

H-3 TRAINING FREQUENCY OAC 3745-54-16 (C)

Facility Personnel will take part in an annual review of the hazardous waste training program.

H-4 TRAINING RECORDS AND DOCUMENTS OAC 3745-54-16 (D) & (E)

USA Lamp & Ballast maintains training records and documents on-site.

H-4a: Job Titles OAC 3745-54-16 (D)(1)

Written job titles and descriptions including requisite skills, education or other qualifications along with job duties are contained in Attachment C. The names of employees filling these positions are maintained at the facility.

**USA Lamp & Ballast Recycling, Inc - Part B Permit
Renewal**

Section H PERSONNEL TRAINING

H-4b: Job Descriptions
OAC 3745-54-16 (D)(2)

Written job titles and descriptions including requisite skills, education or other qualifications along with job duties are contained in Attachment C. The names of employees filling these positions are maintained at the facility.

H-4c: Training Descriptions
OAC 3745-54-16 (D)(3)

USA Lamp & Ballast maintains a written description of the type and amount of training given to each employee; records are kept at the facility. See Attachments A & B for samples.

H-4d: Training Records
OAC 3745-54-16 (D)(4) & (E)

USA Lamp & Ballast maintains records documenting training or job experience given to each employee and training records are kept at the facility. Training records on current employees will be kept until closure of the facility and training records on former employees are kept for at least 3 years from the date the employee last worked at the facility. See Attachment A for samples.

**USA Lamp & Ballast Recycling, Inc - Part B Permit
Renewal**

**SECTION H PERSONNEL TRAINING
ATTACHMENT A**

EMPLOYEE TRAINING SUMMARY / MATRIX

TRAINING	TRAINING FREQUENCY
HAZWOPER 40-HOUR	Once
HAZWOPER 8-HOUR	Annually
HAZCOM	Orientation / Annually
SECURITY AWARENESS	Orientation / 3 years(with Haz Mat)
CONTROLLED SUBSTANCES	Orientation
DOT HAZMAT	Orientation / 3 years
DOT HAZMAT REFRESHER	Annually
PPE	Orientation / Annually
EMERGENCY RESPONSE / CONTINGENCY PLAN	Orientation / Annually
GOOD HOUSEKEEPING	Orientation / On-going
SPILL PREVENTION & RESPONSE	Orientation / Annually
MATERIALS HANDLING & STORAGE	Orientation / On-going / Annually
RESPIRATOR FIT TEST	Orientation / Annually
FORKLIFT	Orientation / 3 years
GENERAL SAFETY GUIDELINES	Orientation / On-going / Annually

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal
Section H PERSONNEL TRAINING / Attachment B – EMPLOYEE TRAINING LOG

EMPLOYEE NAME: _____ **START DATE** _____

TRAINING DESCRIPTION	DATE	DATE	DATE	DATE	DATE	EMPLOYEE INITIALS	SUPERVISOR INITIALS
Pulmonary Function Test							
Respirator Fit Test							
Forklift Test							
Haz Mat Transportation							
Haz Mat Transportation 8hr refresher							
Hazardous Communication							
Contingency Plan							
Security Awareness							
HAZWOPER 8-HOUR							
Introduction to Hazwoper Retraining							
Personal Protective Equipment and Decontamination Procedures							
Exposure Monitoring and Medical Surveillance							
Understanding Chemical Hazards							
Accidental Release Measures and Spill Cleanup Procedures							
Handling Hazardous Materials							
Hazmat Labeling							
Work Practices & Engineering Controls							

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal
Section H PERSONNEL TRAINING / Attachment B – EMPLOYEE TRAINING LOG

EMPLOYEE NAME: _____ **START DATE** _____

TRAINING DESCRIPTION	DATE	DATE	DATE	DATE	DATE	EMPLOYEE INITIALS	SUPERVISOR INITIALS
HAZWOPER 40-HOUR							
Understanding Hazwoper							
Accidental Release Measures and Spill Cleanup Procedures							
Handling Hazardous Materials							
Confined Space Entry							
Dealing with the Media in Emergency Situations							
ANSI Material Safety Data Sheet							
Emergency Response Plan							
Personal Protective Equipment							
Decontamination Procedures							
Electrical Safety in Hazmat Environments							
Hazmat Labeling							
Work Practices & Engineering Controls							
Medical Surveillance Programs							
Safety Orientation							
Monitoring Procedures & Equipment							
Respiratory Protection							
Fire Prevention							
Site Safety & Health Plan							
Heat Stress							

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal
Section H PERSONNEL TRAINING / Attachment B – EMPLOYEE TRAINING LOG

EMPLOYEE NAME: _____ **START DATE** _____

TRAINING DESCRIPTION	DATE	DATE	DATE	DATE	DATE	EMPLOYEE INITIALS	SUPERVISOR INITIALS
GENERAL SAFETY GUIDELINES							
Good Housekeeping							
Controlled Substances							
Manual Handling Of Materials							
Forklifts Vs Pedestrians							
Empty Skids And Pallets							
Hurry Up Can Hurt							
Compressed Air							
Conveyor Safety							
Say "Aye" To Eye Protection							
Hand Protection							
Make A Mental Map							
Fire Safety							
Slips & Falls							
Setting A Good Example							
You're Responsible							
You're The Loser							
Safe Work Habits							
Job Safety Analysis							
Obey The Unenforceable							
Safe Lifting Techniques							

USA Lamp & Ballast Recycling, Inc - Part B Renewal
Section H PERSONNEL TRAINING
ATTACHMENT C - EMPLOYEE JOB DESCRIPTIONS

Position Title: **President**

Position Responsibilities and Duties:

- Responsible for overall operations at all facilities.
- Ensure all processes and procedures are implemented and compliance with all appropriate Federal, State and Local Laws.
- Oversees licensing and permitting for all facilities.
- Main liaison with local, state and federal regulatory agencies.
- Responsible for company-wide sales and marketing including approval of major quotations and contracts.
- Responsible for administrative management
- Approves all major facility expenditures

Training

- All required DOT, EPA, RCRA and OSHA training including, but not limited to:
 - DOT HAZMAT
 - Hazwoper 40 hour training and annual 8-hour refresher training
 - Contingency Plan / Emergency Response / Spill Prevention

Experience and Qualifications

- Higher Education Degree or comparable experience
- Comprehensive knowledge of RCRA and DOT regulations

USA Lamp & Ballast Recycling, Inc - Part B Renewal
Section H PERSONNEL TRAINING
ATTACHMENT C - EMPLOYEE JOB DESCRIPTIONS

Position Title: Senior Vice President

Position Responsibilities and Duties:

- Ensures all processes and procedures are implemented and compliance with all appropriate Federal, State and Local Laws.
- Obtains licensing and permitting for all facilities.
- Responsible for environmental and safety issues at all facilities.
- Responsible to ensure all employees receive all required training for the proper and safe handling of universal and hazardous materials, emergency and operating procedures.
- Key liaison with local, state and federal regulatory agencies.
- Jointly responsible for overall operations and technical aspects of all facilities.
- Responsible for reviewing waste profiles for accuracy and completeness of EPA and DOT information prior to approving waste stream to be handled at or on behalf of any USA Lamp & Ballast Recycling facility.

Training

- All required DOT, EPA, RCRA and OSHA training including, but not limited to:
 - DOT HAZMAT
 - Hazwoper 40 hour training and annual 8-hour refresher training
 - Contingency Plan / Emergency Response / Spill Prevention

Experience and Qualifications

- Higher Education Degree or comparable experience
- Comprehensive knowledge of RCRA and DOT regulations
- 3 – 5 years experience in universal waste / hazardous waste management.

USA Lamp & Ballast Recycling, Inc - Part B Renewal
Section H PERSONNEL TRAINING
ATTACHMENT C - EMPLOYEE JOB DESCRIPTIONS

Position Title: **Facility Manager**

Position Responsibilities and Duties:

- Manages daily overall operations and technical aspects of facility, including transportation, sales and marketing.
- Primary Emergency coordinator. Notifies proper authorities in emergency situations.
- Responsible for environmental and safety issues at facility
- Responsible for review of incoming and outgoing universal and hazardous waste activities (i.e. manifests etc)
- Responsible for ensuring employees receive all required training for proper and safe handling of universal and hazardous materials, emergency and operating procedures.
- Assists Vice President and Health and Safety Officer with all facility licenses, permits and procedures along with acting as local liaison with regulatory agencies.
- Hires, trains and oversees facility employees.
- Oversees maintenance of operating log, monitoring records, maintenance records, inspection records, personnel training records and all other required facility records along with required local, State, and Federal agency reports.
- Schedules all facility maintenance and repairs to structures and equipment.
- Conduct all environmental audits and tours.
- Understand all office procedures and computer programs.

Training

- All required DOT, EPA, RCRA and OSHA training including, but not limited to:
 - DOT HAZMAT
 - Hazwoper 40 hour training and annual 8-hour refresher training
 - Contingency Plan / Emergency Response / Spill Prevention

Experience and Qualifications

- Higher Education Degree or comparable experience
- Knowledge of universal / hazardous
- 2 – 3 years experience in plant operations

USA Lamp & Ballast Recycling, Inc - Part B Renewal
Section H PERSONNEL TRAINING
ATTACHMENT C - EMPLOYEE JOB DESCRIPTIONS

Position Title: **Technical Supervisor / Technician**

Position Responsibilities and Duties:

- Responsible for verifying incoming material is reviewed and logged in and assigned to proper storage locations.
- Responsible for ensuring outgoing shipments are properly loaded, labeled and have required paperwork.
- Inspect operating equipment and emergency equipment for proper operation and storage areas for evidence of leaks and spills.
- Make appropriate entries into operating log, monitoring records and inspection records according to established procedures.
- Operate material handling / processing equipment.
- Disassemble, sort and containerize material according to established procedures.
- Assist in training and supervision of technicians to handle material safely and appropriately and according to established procedures.
- Secondary Emergency Coordinator; notifies supervisor and other authorities as necessary in emergency situations.

Training

- Job Duty specific training such as loading & unloading procedures, proper material logging and labeling, disassembly, sorting, containerizing and storage of materials, operation of handling and processing equipment in a safe and compliant manner.
- All required EPA, RCRA and OSHA training including, but not limited to:
 - Hazwoper 40 hour training and annual 8-hour refresher training
 - Contingency Plan / Emergency Response / Spill Prevention

Experience and Qualifications

- High School diploma or equivalent
- 2 – 3 years experience as technician with related activities is helpful, but not required.
- Good communication skills

USA Lamp & Ballast Recycling, Inc - Part B Renewal
Section H PERSONNEL TRAINING
ATTACHMENT C - EMPLOYEE JOB DESCRIPTIONS

Position Title: **Driver / Technician**

Position Responsibilities and Duties:

- Responsible for safe transportation of universal and hazardous waste, including ensuring material is properly containerized and labeled for transportation.
- Responsible for proper completion of all required paperwork, including assisting with labeling and logging in material at the facility.
- Ability to follow all loading and unloading procedures and to ensure safe handling of materials at all times.
- Responsible for maintaining vehicle in safe running condition and ensuring vehicle meets all road and safety standards at all times.
- Must be able to meet all requirements of Technician

Training

- All required DOT, EPA, RCRA and OSHA training including, but not limited to:
 - DOT HAZMAT
 - Hazwoper 40 hour training and annual 8-hour refresher training
 - Contingency Plan / Emergency Response / Spill Prevention
- Job Duty specific training such as loading & unloading procedures, proper completion of shipping documents, material logging and labeling, containerizing and storage of materials.

Experience and Qualifications

- High School diploma or equivalent
- Good Driving Record
- Appropriate license for commercial motor vehicle along with applicable endorsements.
- Good communication skills

USA Lamp & Ballast Recycling, Inc - Part B Renewal
Section H PERSONNEL TRAINING
ATTACHMENT C - EMPLOYEE JOB DESCRIPTIONS

Position Title: Technician

Position Responsibilities and Duties:

- Load and unload trucks and log incoming material and assign to proper storage locations.
- Operate material handling / processing equipment.
- Disassemble, sort and containerize material according to established procedures.

Training

- Job Duty specific training such as loading & unloading procedures, proper material logging and labeling, disassembly, sorting, containerizing and storage of materials, operation of handling and processing equipment in a safe and compliant manner.
- All required EPA, RCRA and OSHA training including, but not limited to:
 - Hazwoper 40 hour training and annual 8-hour refresher training
 - Contingency Plan / Emergency Response / Spill Prevention

Experience and Qualifications

- High School diploma or equivalent

USA Lamp & Ballast Recycling, Inc - Part B RENEWAL
Section H PERSONNEL TRAINING
ATTACHMENT C - EMPLOYEE JOB DESCRIPTIONS

Position Title: **Office Assistant**

Position Responsibilities and Duties:

- Schedules incoming and outgoing shipments with approval and guidance by Facility Manager.
- Prepares and distributes all necessary paperwork for incoming and outgoing shipments under direct supervision of Facility Manager.
- Assists Facility Manager with quotations and customer service.
- Responsible for maintenance of customer files and paperwork.

Training

- Job Duty specific training such as scheduling shipments, proper completion of paperwork, data entry etc.
- All required EPA, RCRA and OSHA training including, but not limited to:
 - Contingency Plan / Evacuation
 - HazCom

Experience and Qualifications

- High School diploma or equivalent.
- Excellent computer and communication skills.
- Prior scheduling experience is preferred.
- Knowledge of universal / hazardous waste and DOT rules and procedures is desirable.

USA Lamp & Ballast Recycling, Inc - Part B Application

Section I CLOSURE PLAN

SECTION I - CLOSURE PLAN

1.0 INTRODUCTION

This closure plan has been developed by USA Lamp & Ballast Recycling, Inc to comply with the requirements under 40 CFR 264 Subpart G (264.110-264.120) and Subpart H (264.140-264.151) and the applicable portions of OAC 3745-50-44, 3745-55 and 3745-66 and to fulfill the Part B Permit requirements per OAC 3745-50-44 (A)(13).

USA Lamp & Ballast Recycling, Inc (EPA# OHR-000-109-819), located at 7806 Anthony Wayne Boulevard, Cincinnati, OH 45216 is a destination facility for universal waste lamps and accepts lamps for storage prior to being recycled at the facility. Crushed and broken lamps and mercury containing debris / residuals are also accepted at the facility. USA Lamp & Ballast Recycling, Inc. has set up a closure plan / fund as required by the Ohio EPA.

USA Lamp & Ballast Recycling, Inc will maintain on-site a copy of the approved closure plan and all revisions of the plan until certification of the closure completeness has been submitted and accepted by the Ohio Environmental Protection Agency (OEPA).

2.0 CLOSURE PERFORMANCE STANDARD OAC 3745-55-11

Per the Closure Performance Standard outlined in OAC 3745-55-11, USA Lamp & Ballast Recycling, Inc will close the facility located at 7806 Anthony Wayne Avenue, Cincinnati, OH 45216 in a manner that:

- A. Minimizes the need for further maintenance; and
- B. Controls, minimizes, or eliminates to the extent necessary to prevent threats to human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste

USA Lamp & Ballast Recycling, Inc - Part B Application

Section I CLOSURE PLAN

decomposition products to the ground or surface waters or to the atmosphere;
and

- C. Complies with the closure requirements of rules 3745-55-10 to 3745-55-20 of the Administrative Code, including, but not limited to, the requirements of rules 3745-55-78, 3745-55-97, 3745-56-28, 3745-56-58, 3745-56-80, 3745-57-10, 3745-57-51, 3745-57-91 to 3745-57-93, and 3745-205-102 of the Administrative Code.

3.0 INVENTORY OAC 3745-55-12(B)(3)

USA Lamp & Ballast will assume that the facility will be operating at the maximum waste inventory at the time of final closure. USA Lamp & Ballast Recycling, Inc is permitted to store a maximum of 325,000 pounds which includes cubic yard boxes and drums.

4.0 CLOSURE SCHEDULE OAC 3745-55-12(B)(6) & D, 3745-55-13

USA Lamp & Ballast Recycling, Inc does not have a definite final closure date; and intends to continue the use of the facility indefinitely, according to all applicable federal, state and local regulations.

USA Lamp & Ballast Recycling, Inc will notify the OH EPA, in writing, at least 45 days prior to initiation of final closure of the facility. All lamps and mercury-containing debris / residuals will be processed and / or removed from the facility for recovery, treatment or disposal at permitted off-site facilities within 90 days of final receipt of material. Closure activities will be completed within 180 days of accepting the final volume of materials. The professional engineer's certification will be submitted to the OH EPA within 60 days of completion of the final closure.

If, during closure it becomes apparent that an extension to these time periods is necessary, an application for extension will be made to OH EPA in accordance with all applicable rules and regulations.

USA Lamp & Ballast Recycling, Inc - Part B Application

Section I CLOSURE PLAN

5.0 MODIFICATION TO CLOSURE PLAN **OAC 3745-55-12 (C)**

USA Lamp & Ballast Recycling will submit a written request to the OH EPA whenever there is a need for a modification to the approved closure plan in accordance with the applicable procedures in OAC 3745-50-40 to 3745-50-66. The written notification or request will include a copy of the amended closure plan for review or approval by the Director. The request will be submitted whenever:

1. There is a change in ownership, operating plans, or facility design which affect the existing closure plans.
2. There is a change in the expected date of closure, if applicable.
3. In conducting partial or final closure activities, unexpected events require a modification of the approved closure plan.
4. A request to the director is made to apply alternative requirements to a regulated unit under OAC 3745-54-90(F), OAC 3745-55-10(C), and/or OAC 3745-55-40(D).

6.0 CERTIFICATION OF CLOSURE **OAC 3745-55-15**

In compliance with OAC 3745-55-15, within sixty days of completion of the closure, USA Lamp & Ballast Recycling, Inc will submit to the OH EPA Director, by registered mail, a certification that the facility has been closed in accordance with the specifications in the approved closure plan. The certification will be signed by USA Lamp & Ballast and by an independent, registered professional engineer. Documentation supporting the independent, registered professional engineer's certification shall be furnished to the director upon request until USA Lamp & Ballast has been released from the financial assurance requirements for closure under paragraph (I) of rule 3745-55-43 of the Administrative Code.

USA Lamp & Ballast Recycling, Inc - Part B Application

Section I CLOSURE PLAN

7.0 CLOSURE PROCEDURES

OAC 3745-55-12, 3745-55-14

USA Lamp & Ballast Recycling, Inc will comply with all closure procedures per OAC 3745-55-12 and 3745-55-14. The closure procedures are designed to take the facility out of service and minimize the need for further maintenance. The closure procedures will protect human health and the environment by removing all waste and waste residue thereby eliminating the possibility of post-closure releases of any potentially hazardous material. No environmental impact will occur to soil, groundwater or surface water as all closure activities will take place within the facility and no material will be stored outside of the facility or disposed of on-site.

- USA Lamp & Ballast Recycling, Inc along with an independent third party will analyze closure tasks and determine locations for storage, sale or disposal of equipment and waste.
- All lamps remaining at the facility will be processed on-site or shipped to either our USA Lamp & Ballast Recycling facilities located in Mason, MI or Spartanburg, SC or to a fully licensed / permitted third party facility for processing.
- All remaining wastes, recyclable items and products will be removed and properly disposed of according to all applicable rules and regulations.
- The processing equipment will be dismantled and decontaminated by vacuuming the residue and cleaning with HGX Mercury Decontaminate Powder and will then be loaded for transport for storage or disposal.
- Any waste generated during the dismantling and decontamination process will be handled and properly disposed of according to all applicable rules and regulations. Personnel conducting equipment cleaning shall adhere to all health and safety guidelines.
- The facility will be cleaned and surfaces cleaned with HGX Mercury Decontaminate Powder as necessary to remove mercury residue. Wastes (boxes, garbage, etc.) will be segregated for proper recycling or disposal.

USA Lamp & Ballast Recycling, Inc - Part B Application

Section I CLOSURE PLAN

- Once the facility has been cleaned, wipe samples will be collected and analyzed for mercury. If surface samples show mercury contamination, the building will be re-cleaned and the cleaning wastes or by-products will be tested to determine if they are hazardous wastes. An additional round of sampling will be performed to determine if any mercury residue remains.
- An independent, registered professional engineer will prepare a certification showing that the facility has been closed in accordance with the specifications in the approved closure plan

8.0 CLOSURE COST ESTIMATE

OAC 3745-55-42

The cost of the closure procedures have been estimated in accordance with OAC 3745-55-42 using the following assumptions:

- Closure cost is based on the maximum possible inventory of:
 - 325,000 pounds combination of cubic yard boxes and drums.
- Closure activities and supervision will be performed by an independent third party.
- No salvage value realized from the sale of materials, facility structures or equipment, land or other assets associated with the facility will be incorporated in the estimated closure cost.
- Materials and residues used / generated in the decontamination process will amount to two (2) 55-gallon drums.
- Closure will be certified by an independent, professional engineer.

Closure cost estimates are attached in Attachment A.

The closure cost estimate will be revised annually in accordance with the procedures outlined in OAC 3745-55-42. The adjustment must be determined within 60 days prior to the anniversary date of the establishment of the financial assurance

USA Lamp & Ballast Recycling, Inc - Part B Application

Section I CLOSURE PLAN

mechanism and will be made either by recalculating the maximum costs of closure in current dollars or by using an inflation factor derived from the most recent implicit Price Deflator for Gross National Product published by the US Department of Commerce in its Survey of Current business.

9.0 FINANCIAL ASSURANCE MECHANISM **OAC 3745-55-12 (B)(7), 3745-55-43, 3745-55-51**

USA Lamp & Ballast Recycling, Inc will use an Irrevocable Standby Letter of Credit per specifications listed in OAC 3745-55-51 (D) and a standby closure trust fund worded according to specifications listed in OAC 3745-55-51(A) to comply with the financial assurance for facility closure requirements per OAC 3745-55-43. A copy of the Irrevocable Standby Letter of Credit and Standby Closure Trust Fund are attached as Attachment B.

10.0 LIABILITY REQUIREMENTS **OAC 3745-55-47, 3745-55-51(I)**

USA Lamp & Ballast Recycling, Inc provides \$1,000,000 per occurrence and \$2,000,000 annual aggregate hazardous waste facility liability insurance for sudden and non-sudden accidental occurrences in compliance with OAC 3745-55-47. A copy of the endorsement worded according to the requirements of OAC 3745-55-51(I) is attached as Attachment C.

11.0 SURVEY PLAT / DEED NOTICE **OAC 3745-55-16 & OAC 3745-55-19**

A notice in the deed and a survey plan is not required for the USA Lamp & Ballast Recycling, Inc since there are no hazardous waste disposal units located at the facility. However, if hazardous waste disposal units were to be located at the facility in the future, USA Lamp & Ballast Recycling would comply with the OAC 3745-55-16 & OAC 3745-55-19.

USA Lamp & Ballast Recycling, Inc - Part B Application

Section I CLOSURE PLAN

12.0 POST-CLOSURE PLAN **OAC 3745-55-17, 3745-55-44, 3745-55-45**

A post-closure plan is not required for the USA Lamp & Ballast Recycling, Inc since there are no hazardous waste disposal units located at the facility. All universal / hazardous wastes will be transported to properly licensed / permitted waste management facilities as detailed in the closure plan. USA Lamp & Ballast Recycling, Inc would comply with OAC 3745-55-17, 3745-55-44, and 3745-55-45 if hazardous waste disposal units were to be located at the facility in the future.

12.1 Post-Closure Cost Estimate **OAC 3745-55-44**

USA Lamp & Ballast Recycling, Inc does not have any hazardous waste disposal units; therefore, post-closure activities are not necessary. If USA Lamp & Ballast Recycling, Inc were to have any hazardous waste disposal units in the future, we would comply with OAC 3745-55-44.

12.2 Financial Assurance Mechanism for Post – Closure **OAC 3745-55-45**

USA Lamp & Ballast Recycling, Inc does not have any hazardous waste disposal units; therefore, post-closure activities and the financial assurance mechanism are not necessary. If USA Lamp & Ballast Recycling, Inc were to have any hazardous waste disposal units in the future, we would comply with OAC 3745-55-45.

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section I CLOSURE PLAN

Attachment A CLOSURE COSTS

ESTIMATED CLOSURE COSTS

2017 Renewal

1.	Processing of remaining lamp inventory 175,000 pounds of unprocessed lamps @ \$0.06 / lb.....	\$10,500.00
2.	Transportation of remaining lamp inventory to third party facility	\$1,200.00
3.	Retort mercury containing debris / residuals (<i>includes dry residue from clean-up process</i>) (200 drums at \$240.50 per drum).....	\$48,100.00
4.	Transportation of mercury containing debris / residuals and 2 drums clean-up material by hazardous waste carrier	\$1,200.00
5.	Disassemble processing equipment; decontaminate and load for transport for storage or disposal (16 hours at \$62.50/hour).....	\$1,000.00
6.	Decontaminate facility floors, walls and ceilings (16 hours at \$62.50 per hour)	\$1,000.00
7.	Collect wipe samples from floors, walls and ceilings	\$300.00
8.	Lab analysis of wipe samples (15 samples @ \$53.33/analysis)	\$800.00
9.	Complete additional facility or equipment decontamination as required by test results. (8 hours at \$62.50 per hour)	\$500.00
10.	Collect additional wipe samples from within facility surfaces (if necessary)	\$300.00
11.	Lab analysis of additional wipe samples (if necessary) (15 samples @ \$53.33/analysis)	\$800.00
12.	Disposal of two (2) drums of hazardous waste clean-up material <i>(The majority of clean-up material will be dry residue from the vacuuming process and will be included with the material sent for retort in item number 3. The remaining 2 drums of clean-up material in item number 12 will be liquid clean-up material and PPE)</i> 2 drums @ \$1,000.00/drum	\$2,000.00
13.	Project Management of Facility Closure by third party Includes report preparation for OH EPA.....	\$6,000.00
	TOTAL ESTIMATED CLOSURE COSTS	\$73,700.00

USA LAMP & BALLAST RECYCLING, INC

Part B Application

Section I CLOSURE PLAN

Attachment B STANDBY TRUST AGREEMENT

Trust Agreement

Trust agreement. The "Agreement," entered into as of December 2, 2016 by and between USA Lamp & Ballast Recycling, Inc., a OH corporation, the "Grantor," and Horizon Bank, N.A. dba Horizon Trust and Investment Management, a national bank, the "Trustee."

Whereas, the Ohio Environmental Protection Agency, "Ohio EPA", has established certain rules applicable to the Grantor, requiring that the owner or operator of a hazardous waste management facility shall provide assurance that funds will be available when needed for closure and/or post-closure care of the facility,

Whereas, the Grantor has elected to establish a trust to provide all or part of such financial assurance for the facilities identified herein.

Whereas, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the trustee under this agreement, and the Trustee is willing to act as trustee,

Now, therefore, the Grantor and the Trustee agree as follows:

Section 1. Definitions. As used in this Agreement:

- (a) The term "Grantor" means the owner or operator who enters into this Agreement and any successors or assigns of the Grantor.
- (b) The term "Trustee" means the Trustee who enters into this Agreement and any successor Trustee.
- (c) The term "director" means the director of the Ohio EPA, or his designee.

Section 2. Identification of Facilities and Cost Estimates. This Agreement pertains to the facilities and cost estimates identified on attached Schedule A.

Section 3. Establishment of Fund. The Grantor and the Trustee hereby establish a trust fund, the "Fund" for the benefit of the Ohio EPA. The Grantor and the Trustee intend that no third party have access to the Fund except as herein provided. The Fund is established initially as consisting of the property, which is acceptable to the Trustee, described in Schedule B attached hereto. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund will be held by the Trustee, in trust, as hereinafter provided. The Trustee shall not be responsible nor shall it undertake any responsibility for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities of the Grantor established by the Ohio EPA.

Section 4. Payment for Closure and Post-Closure Care. The Trustee will make such payments from the Fund as the director will direct, in writing, to provide for the payment of the costs of closure and/or post-closure care of the facilities covered by this Agreement. The Trustee will

reimburse the Grantor or other persons as specified by the director from the Fund for closure and post-closure expenditures in such amounts as the director will direct, in writing. In addition, the Trustee will refund to the Grantor such amounts as the director specifies in writing. Upon refund, such funds will no longer constitute part of the Fund as defined herein.

Section 5. Payments Comprising the Fund. Payments made to the Trustee for the Fund will consist of cash or securities acceptable to the Trustee.

Section 6. Trustee Management. The Trustee will invest and reinvest the principal and income of the Fund and keep the Fund invested as a single fund, without distinction between principal and income, in accordance with general investment policies and guidelines which the Grantor may communicate in writing to the Trustee from time to time, subject, however, to the provisions of this Section. In investing, reinvesting, exchanging, selling and managing the Fund, the Trustee will discharge his duties with respect to the trust fund solely in the interest of the beneficiary and with the care, skill, prudence, and diligence under the circumstances then prevailing which persons of prudence, acting in a like capacity and familiar with such matters, would use in the conduct of an enterprise of a like character and with like aims; except that:

- (i) Securities or other obligations of the Grantor, or any other owner or operator of the facilities, or any of their affiliates as defined in the Investment Company Act of 1940, as amended, 15 USC 80a-2(a), will not be acquired or held, unless they are securities or other obligations of the Federal or a State government;
- (ii) The Trustee is authorized to invest the Fund in time or demand deposits of the Trustee, to the extent insured by an agency of the Federal or State government; and
- (iii) The Trustee is authorized to hold cash awaiting investment or distribution uninvested for a reasonable time and without liability for the payment of interest thereon.

Section 7. Commingling and Investment. The Trustee is expressly authorized in its discretion:

- (a) To transfer from time to time any or all of the assets of the Fund to any common, commingled or collective trust fund created by the Trustee in which the Fund is eligible to participate, subject to all of the provisions thereof, to be commingled with the assets of other trusts participating therein; and
- (b) To purchase shares in any investment company registered under the Investment Company Act of 1940, 15 U.S.C. 80a-1 et seq., including one which may be created, managed, underwritten, or to which investment advice is rendered or the shares of which are sold by the Trustee. The Trustee may vote such shares in its discretion.

Section 8. Express Powers of Trustee. Without in any way limiting the powers and discretions conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered:

- (a) To sell, exchange, convey, transfer or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee will be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;
- (b) To make, execute, acknowledge and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted;
- (c) To register any securities held in the Fund in its own name or in the name of a nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit or arrange for the deposit of such securities in a qualified central depository even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depository with other securities deposited therein by another person, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency or instrumentality thereof, with a Federal Reserve bank, but the books and records of the Trustee will at all times show that all such securities are part of the Fund;
- (d) To deposit any cash in the Fund in interest-bearing accounts maintained or savings certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or State government; and
- (e) To compromise or otherwise adjust all claims in favor of or against the Fund.

Section 9. Taxes and Expenses. All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the Fund will be paid from the Fund. All other expenses incurred by the Trustee in connection with the administration of this Trust, including fees for legal services rendered to the Trustee, the compensation of the Trustee to the extent not paid directly by the Grantor, and all other proper charges and disbursements of the Trustee will be paid from the Fund.

Section 10. Annual Valuation. The Trustee will annually, at least thirty days prior to the anniversary date of establishment of the Fund furnish to the Grantor and to the director a statement confirming the value of the Trust. Any securities in the Fund will be valued at market value as of no more than sixty days prior to the anniversary date of establishment of the Fund. The failure of the Grantor to object in writing to the Trustee within ninety days after the statement has been furnished to the Grantor and the director will constitute a conclusively binding assent by the Grantor, barring the Grantor from asserting any claim or liability against the Trustee with respect to matters disclosed in the statement.

Section 11. Advice of Counsel. The Trustee may from time to time consult with counsel, who may be counsel to the Grantor, with respect to any question arising as to the construction of this

Agreement or any action to be taken hereunder. The Trustee will be fully protected, to the extent permitted by law, in acting upon the advice of counsel.

Section 12. Trustee Compensation. The Trustee will be entitled to reasonable compensation for its services as agreed upon in writing from time to time with the Grantor.

Section 13. Successor Trustee. The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the Grantor has appointed a successor Trustee and this successor accepts the appointment. The successor Trustee will have the same powers and duties as those conferred upon the Trustee hereunder. Upon the successor Trustee's acceptance of the appointment, the Trustee will assign, transfer and pay over to the successor Trustee the funds and properties then constituting the Fund. If for any reason the Grantor cannot or does not act in the event of the resignation of the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment of a successor trustee or for instructions. The successor Trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, the director, and the present Trustee by certified mail ten days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this Section will be paid as provided in Section 9.

Section 14. Instructions to the Trustee. All orders, requests and instructions by the Grantor to the Trustee will be in writing, signed by such persons as are designated in the attached Exhibit A or such other designees as the Grantor may designate by amendment to Exhibit A. The Trustee will be fully protected in acting without inquiry in accordance with the Grantor's orders, requests and instructions. All orders, requests, and instructions by the director to the Trustee will be in writing, signed by the director, and the Trustee will act and will be fully protected in acting in accordance with such orders, requests and instructions. The Trustee will have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or the director hereunder has occurred. The Trustee will have no duty to act in the absence of such orders, requests and instructions from the Grantor and/or the director except as provided for herein.

Section 15. Notice of Nonpayment. The Trustee will notify the Grantor and the director, by certified mail within ten days following the expiration of the thirty-day period after the anniversary of the establishment of the Trust, if no payment is received from the Grantor during that period. After the pay-in period is completed the Trustee is not required to send a notice of nonpayment.

Section 16. Amendment of Agreement. This Agreement may be amended by an instrument in writing executed by the Grantor, the Trustee, and the director, or by the Trustee and the director if the Grantor ceases to exist.

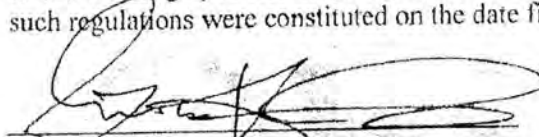
Section 17. Irrevocability and Termination. Subject to the right of the parties to amend this Agreement as provided in Section 16, this Trust will be irrevocable and will continue until terminated at the written agreement of the Grantor, the Trustee, and the director or by the Trustee and the director if the Grantor ceases to exist. Upon termination of the Trust, all remaining trust property, less final trust administration expenses, will be delivered to the Grantor.

Section 18. Immunity and Indemnification. The Trustee will not incur personal liability of any nature in connection with any act or omission, made in good faith, in the administration of this Trust, or in carrying out any directions by the Grantor or the director issued in accordance with this Agreement. The Trustee will be indemnified and saved harmless by the Grantor or from the Trust Fund, or both, from and against any personal liability to which the Trustee may be subjected by reason of any act or conduct in its official capacity, including all expenses reasonably incurred in its defense in the event the Grantor fails to provide such defense.

Section 19. Choice of Law. This Agreement will be administered, construed and enforced according to the laws of the state of Ohio.

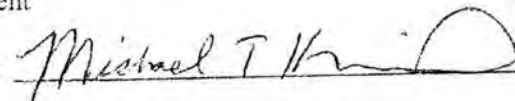
Section 20. Interpretation. As used in this Agreement, words in the singular include the plural and words in the plural include the singular. The descriptive headings for each Section of this Agreement will not affect the interpretation or the legal efficacy of this Agreement.

In witness whereof the parties have caused this Agreement to be executed by their respective officers duly authorized and their corporate seals to be hereunto affixed and attested as of the date first above written: The parties below certify that the wording of this Agreement is identical to the wording specified in paragraph (A)(1) of rule 3745-55-51 of the Administrative Code as such regulations were constituted on the date first above written.


Signature of Grantor


Thomas M Kimmel
President

Attest:



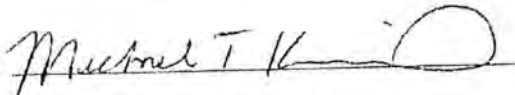
Michael T Kimmel, Notary Public

[Seal]


Signature of Trustee

Barbara A Bialko
VP, Senior Trust Officer

Attest:



Michael T Kimmel, Notary Public

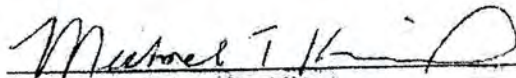
[Seal]

Certification of Acknowledgment

State of Michigan

County of Ingham

On this December 2, 2016, before me personally came Thomas M Kimmel to me known, who, being by me duly sworn, did depose and say that she/he resides at 4374 Brogan Road, Stockbridge, MI 49285, that she/he is President of USA Lamp & Ballast Recycling, Inc., the corporation described in and which executed the above instrument; that she/he knows the seal of said corporation; that the seal affixed to such instrument is such corporate seal; that it was so affixed by order of the Board of Directors of said corporation, and that she/he signed her/his name thereto by like order.


Signature of Notary Public

MI0EPA

Schedule A

Pursuant to Section 2 of this Agreement, the following are the facilities for which financial assurance is being provided through the Trust established by this Agreement:

U.S. EPA identification number: OHR 000 109 819

Facility Name: USA Lamp & Ballast Recycling, Inc.

Address: 7806 Anthony Wayne Avenue, Cincinnati, OH 45216

Closure Cost Estimate: \$73,891.36

Post-Closure Cost Estimate: \$N/A

Schedule B

This trust is funded on December 2, 2016 in the amount of Eighty Thousand U.S. dollars (\$80,000.00).

Trust Account Number: 27815004040

Exhibit A

Pursuant to Section 14 of this Agreement, the following person(s) are designated by the Grantor as authorized to provide orders, requests, and instructions to the Trustee:

Name: Thomas M Kimmel

Title: President, CEO

Name: Michael T Kimmel

Title: Vice President

Name:

Title:

**CERTIFICATE OF INSURANCE
OHIO HAZARDOUS WASTE FACILITY**

Named Insured and Mailing Address:
USA Lamp & Ballast Recycling, Inc.
DBA: Cleanlites Recycling, Inc.
655 Hull Rd
Mason, MI 48854

Policy Number	Policy Effective Date	Policy Expiration Date	Endorsement Effective Date
GSP2019695-10	10/20/2016	10/20/2017	10/20/2016

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. Nautilus Insurance Company, the "Insurer", of 7233 E. Butherus Drive, Scottsdale, AZ 85260, hereby certifies that it has issued liability insurance covering bodily injury and property damage to USA Lamp & Ballast Recycling, Inc. DBA: Cleanlites Recycling, Inc., the "insured", of 7806 Anthony Wayne Avenue, Cincinnati, OH 45216 in connection with the insured's obligation to demonstrate financial responsibility under rules 3745-55-47 or 3745-66-47 of the Administrative Code. The coverage applies at:

OHR000109819
USA Lamp & Ballast Recycling
DBA: Cleanlites Recycling, Inc.
7806 Anthony Wayne Avenue
Cincinnati, OH 45216

for sudden accidental occurrences. The limits of liability are \$1,000,000 each occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs. This coverage is provided under policy number GSP2019695-10, issued on 10/20/2016. The effective date of said policy is 10/20/2016.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
- a. Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in paragraph (F) of rule 3745-55-47 or paragraph (F) of rule 3745-66-47 of the Administrative Code.
 - c. Whenever requested by the director of the Ohio Environmental Protection Agency, the Insurer agrees to furnish to the director a signed duplicate original of the policy and all endorsements.
 - d. Cancellation of the insurance, whether by the Insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty days after a copy of such written notice is received by the director.
 - e. Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty days after a copy of such written notice is received by the director.

I hereby certify that the wording of this instrument is identical to the wording specified in paragraph (J) of 3745-55-51 of the Administrative Code as such regulation was constituted on the date first above written, and the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.



Kenneth Berger
President - BSUM

Authorized Representative of
Nautilus Insurance Company

Administrative Office
7233 E. Butherus Drive
Scottsdale, AZ 85260

Service Office
Two Ravinia Drive, Suite 1100
Atlanta, GA 30346

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section J CORRECTIVE ACTION PLAN

SECTION J

CORRECTIVE ACTIONS

OAC 3745-50-44 (D)

This section addresses the Description information per OAC 3745-50-44 (D). There are no Corrective Action Plans in place with the OH EPA for this facility. The facility and property were previously owned by Kuhlman Properties, Inc and used as a warehouse for American Paper & Plastics. The facility processes do not and did not produce materials that are likely to affect soil or groundwater. However, if it is determined that a corrective action plan is necessary, USA Lamp & Ballast Recycling, Inc will follow the relevant OH EPA Corrective Action Plan and Corrective Action Handbook.

J-1: INFORMATION REQUIREMENTS FOR WASTE MANAGEMENT UNITS **OAC 3745-50-44 (A)(19)**

J-1a Location of Unit on the Topographic Map **OAC 3745-50-44 (A)(19)**

USA Lamp & Ballast Recycling, Inc has submitted maps and drawings showing the location of the unit on the topographic map and complying with the requirements of OAC 3745-50-44 (A)(19) in the Maps Section of the Part B Permit Application.

J-1b Designation of Type of Unit

USA Lamp & Ballast Recycling, Inc operates a universal waste unit. USA Lamp & Ballast Recycling is a destination facility for universal waste lamps. The lamps are accepted for storage prior to being recycled at the facility. Crushed and broken lamps and mercury containing debris / residuals are also accepted at the facility as characteristic by-products/residuals to be recycled.

J-1c General Dimensions and Structural Description

USA Lamp & Ballast Recycling, Inc is located in an 18,133 square foot building on approximately 1 acre of land. The facility consists of two structures which are connected. The front structure containing the offices and some warehouse space is brick and concrete and the rear (warehouse) is a metal frame structure. The Maps section of the permit application contains drawings and maps of the building and area.

USA Lamp & Ballast Recycling, Inc - Part B Permit Renewal

Section J CORRECTIVE ACTION PLAN

J-1d When the Unit Operated

USA Lamp & Ballast Recycling, Inc commenced operations at 7806 Anthony Wayne Avenue in Cincinnati, OH in June of 2002.

J-1e Specifications of all wastes that have been managed at the unit, to the extent available.

USA Lamp & Ballast Recycling is a destination facility for universal waste lamps. The lamps are accepted for storage prior to being recycled at the facility. Crushed and broken lamps and mercury containing debris / residuals are also accepted at the facility as characteristic by-products/residuals to be recycled.

J-2: UNIT RELEASE OF HAZARDOUS WASTES OR HAZARDOUS CONSTITUENTS

There have been no releases of hazardous wastes or hazardous constituents from the Unit operated by USA Lamp & Ballast Recycling, Inc.

J-3: SAMPLING AND ANALYSIS

There is no evidence of known or potential releases of hazardous waste or hazardous waste constituents at the USA Lamp & Ballast Recycling, Inc site. There are no ground water wells in the area or surface water located on the property. Storage and processing occurs inside the building so there is little or no potential for the release of hazardous wastes or constituents. The facility and property were previously owned by Kuhlman Properties, Inc and used as a warehouse for American Paper & Plastics. There is no historic data of any release of hazardous waste or hazardous waste constituents occurring on the site nor any activities that could have potentially contaminated the site prior to becoming USA Lamp & Ballast Recycling, Inc.