eDocument Workflow Data Ingestion Form

DERR - Hazardous Waste Permitting

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

Keyword Summary:

Secondary ID:	OHR000108050
Facility Name:	USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc.
County:	Fulton
Program:	RCRA C – Hazardous Waste
Permit Type:	Permit to Install & Operate
Permit Subtype:	Application & Support
Permit Classification:	Permit Application
Permit Purpose:	New Permit
Confidentiality Status:	Public Record for Publication

Stamped date on doc:	7/13/2020

CBI/Trade Secret Info (see protocol below)

Request contains CBI/TS claim?	No
Was a "public" copy included?	NA

Financial Assurance Info (see protocol below)

Request contains FA policy/account # info?	Yes

Contingency Plan Info (see protocol below)

Request contains facility staff pers/home phone #'s?	Yes

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: Halee Smith 7/13/2020

Comments

CLEANLITES RECYCLING

Mason, MI • Lakeville, MN • Cincinnati, OH
Wauseon, OH • Spartanburg, SC
(517) 676-0044 | cleanlites@cleanlites.com
www.cleanlites.com

July 10, 2020

Ohio EPA
Lazarus Government Center
50 W. Town St., Suite 700
P.O. Box 1049
Columbus, OH 43215

RE: USA Lamp & Ballast Recycling, Inc (OHR-000-108-050)
Part B Permit Application

To Whom It May Concern:

Please find enclosed a copiy of the Part B Hazardous Waste Permit Application for USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc (OHR-000-108-050).

If you have any questions or comments, please do not hesitate to contact Mike Kimmel (517.676.0044 | mikek@cleanlites.com), David Dempsey (864.316.4462 | david.dempsey@cleanlites.com) or myself.

Thank you for your time and consideration.

Respectfully submitted,

Thomas M Kimmel
President | CEO
517.719.1895 phone
tom@usalamp.com email

cc: David D Dempsey, EHS
Daniel Kimmel, Facility Manager Wauseon
Benny Coyt, EHS

Enclosures:

PART B PERMIT APPLICATION

September 30, 2022

USA LAMP & BALLAST RECYCLING, INC
dba CLEANLITES RECYCLING, INC
EPA ID OHR-000-108-050
715 West Linfoot Street, PO Box 381
Wauseon, OH 43567
419.330.1932 phone | wauseon@cleanlites.com email

CLEANLITES RECYCLING

PART B Permit Application

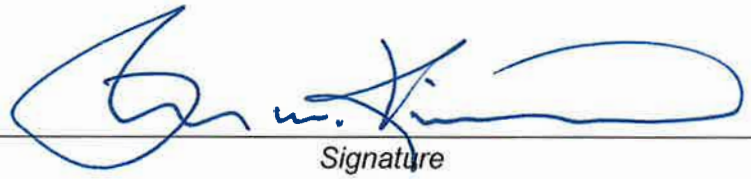
TABLE OF CONTENTS

CLEANLITES RECYCLING

USA Lamp & Ballast Recycling, Inc
dba Cleanlites Recycling, Inc
Part B Permit Application
CERTIFICATION

Part B Permit 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/CEO

Printed Name and Title

Sept. 9, 2022

Date

PART A PERMIT APPLICATION

CLEANLITES RECYCLING

CLEANLITES RECYCLING, INC

December 23, 2019

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

RE: Cleanlites Recycling, Inc Part A Application

Per the Director's Final Findings and Orders for USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc enclosed is the completed Part A Application and supporting documents.

Please contact Mike Kimmel (mikek@cleanlites.com | 517.676.0044 phone | or Benny Coyt (benny.coyt@cleanlites | 513.851.3500 phone)

Thank you

Michael T Kimmel
Senior Vice President
517.676.0044 office
mikek@cleanlites.com email

CC: OH EPA Northwest District Office
Daniel Kimmel, Cleanlites Wauseon

EPA ID Number	O	H	R	0	0	0	1	0	8	0	5	0

OMB# 2050-0024; Expires 05/31/2020

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT PART A FORM

1. Facility Permit Contact

First Name	**Michael**	MI	**T**	Last Name	**Kimmel**
Title	**Senior Vice President**				
Email	**mikek@cleanlites.com**				
Phone	**517-676-0044**	Ext	**NA**	Fax	**NA**

2. Facility Permit Contact Mailing Address

Street Address	**715 West Linfoot Street**	
City, Town, or Village	**Wauseon**	
State **Ohio**	Country **USA**	Zip Code **43567**

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

10/27/2021

4. Other Environmental Permits

A. Permit Type	B. Permit Number	C. Description
P	P 0 1 2 5 0 6 7	Air Permit
N	2 G R N 0 0 6 3 6 * A G	Storm Water No Exposure
E	O H R 0 0 0 1 0 8 0 5 0	EPA Exemption ORC 374.05
E	M I R 0 0 0 0 1 6 4 0 2	EPA Transporter ID
E	U P W 0 6 8 9 4 3 M I	Uniform Hazmat Transporter Program
E	0 6 2 7 1 8 5 5 0 7 1 3 A	Hazardous Materials Cert of Registration

5. Nature of Business

USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling Inc. Is a destination facility for automotive air bags and air bag inflators. The air bag and air bag inflators are placed in an Electronic Air Bag Deactivation System (EABDS). The EABDS will deactivate the inflators producing scrap metals. The scrap metals will be recycled. No other waste will be produced.

6. Process Codes and Design Capacities

Line Number		A. Process Code			B. Process Design Capacity (1) Amount	B. Process Design Capacity (2) Unit of Measure	C. Process Total Number of Units	D. Unit Name
X	1	S	0	1	4751	Y	7	Container Storage Units
X	2	X	0	3	1500	J	1	Thermal Deactivation Unit

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								D. Processes (2) Process Description (if code is not entered in 7.D1))
X	1	D	0	0	1	26280	Y	S	0	1			X	0	3	Airbag Inflator Storage
X	2	D	0	0	3											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

MAIL THE COMPLETED FORM TO: Ohio EPA, DERR P.O. Box 1049 Columbus, OH 43216-1049	Ohio Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION FORM**	For Ohio EPA Use Only

1. Reason for Submittal	**Reason for Submittal:** ☒ Obtaining or updating an EPA ID number for regulated activity ☐ As a component of the Hazardous Waste Report for the year ____ ☐ Notifying that regulated activity is no longer occurring at this site ☐ As a component of a First or Revised RCRA Hazardous Waste Part A Permit Application			
2. Site EPA ID Number	OHR000108050			
3. Site Name	USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc			
4. Site Location Information	Street Address: 715 W Linfoot Street			
	City, Town, or Village: Wauseon			County: Fulton
	State: OH	Country: USA		Zip: 43567
5. Site Land Type	☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other			
6. North American Industry Classification System (NAICS)	A. (Primary) 562920	B.		
	C.	D.		
7. Site Contact Person:	First Name: Thomas	MI: M	Last Name: Kimmel	
	Title: President / CEO			
	Street or P.O. Box: PO Box 212			
	City, Town or Village: Mason			
	State: MI	Country: USA	Zip Code: 48854	
	E-mail: tom@usalamp.com			
	Phone & Ext.: 517.676.0044		Fax: 517.676.0044	
8. Legal Owner and Operator of the Site Additional Owners and/or Operators should be listed in the Comment Section or on another copy of this form page.	Name of Site's Legal Owner: D&K Asset Management, LLC		Date Became Owner (mm/dd/yyyy): 03/27/2018	
	Owner Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other			
	Street or P.O. Box: PO Box 212		City: Mason	
	State: MI	Country: USA	Zip Code: 48854	
	Email: tom@usalamp.com		Phone: 517.676.0044	
	Name of Site's Operator: USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc		Date Became Operator (mm/dd/yyyy): 03/27/2018	
	Operator Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other			
	Street or P.O. Box: 715 W Linfoot Street, PO Box 381		City: Wauseon	
	State: OH	Country: USA	Zip Code: 43567	
	Email: tom@usalamp.com		Phone: 517.676.0044	

EPA 9029 (Revised 12/21/2017)

9. Type of Regulated Waste Activity (If "Yes" 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 a Generator)

- ☐ 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. Temporary Generator (generate from a one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments.
- ☐ e. Episodic Generator (a CESQG or SQG with an episodic event of limited duration that has put the site into a higher generator category)
- ☐ f. Mixed Waste (hazardous and radioactive) Generator

2. Hazardous Waste Report Generator Status
(choose one only if the Reason for Submittal is the Hazardous Waste Report)

- ☐ a. **Large Quantity Generator (LQG):** Greater than 1,000 kg (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 100 kg (220 lbs.) but in no month, did it generate more than 1,000 kg (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; or
- ☒ d. **Non-Generator:** The site did not generate any hazardous waste during the calendar year.

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. Recycler who stores prior to recycling
- ☐ b. Recycler who does not store prior to recycling
- ☐ c. 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**

☐ **9. United States Importer of Hazardous Waste**

10. Recognized Trader
- ☐ a. Importer
- ☐ b. Exporter

11. Spent Lead Acid Battery
- ☐ a. Importer
- ☐ b. Exporter

☐ **12. Electronic Manifest Broker**

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more):

		Managed
a.	Batteries	☒
b.	Pesticides	☒
c.	Mercury Containing Equipment	☒
d.	Lamps	☒
e.	Aerosol Cans	☒
f.	Antifreeze	☒
g.	Paint / Paint Related	☒

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

2. Used Oil Processor and/or Re-refiner
- ☐ a. Processor
- ☐ b. Re-refiner

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

4. Used Oil Fuel Marketer
- ☐ 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 3745-52-216 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	D009	D010	D011	U151	

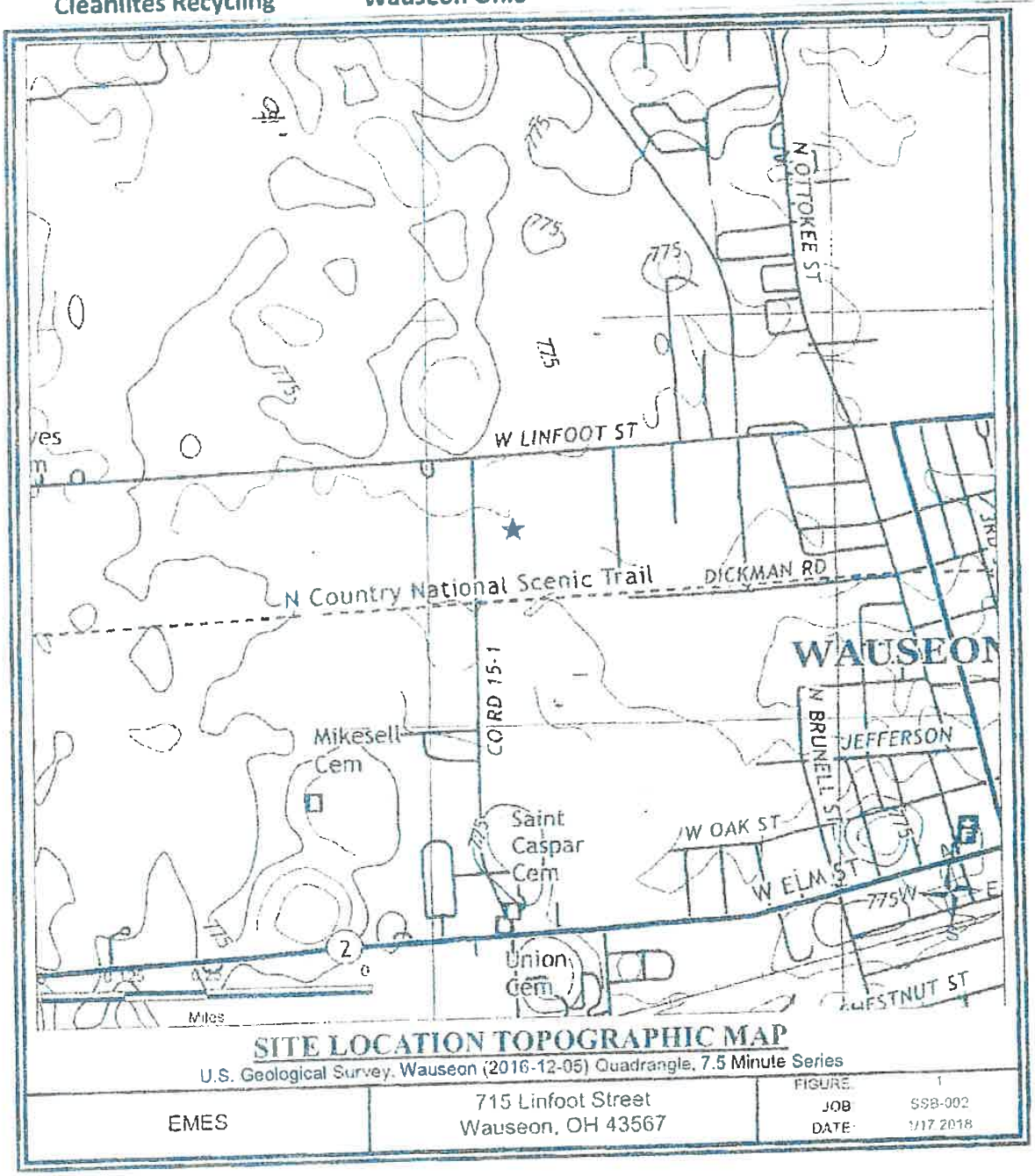
11. **Comments**

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 person who manage the system, or those persons directly responsible for gathering the information, the information is 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 (type or print) Thomas M Kimmel	
Email **tom@usalamp.com**	Official Title **President / CEO**	Date (mm/dd/yyyy) 06/05/2018
Signature of owner, operator, or an authorized representative	**Name (type or print)**	
Email	Official Title	Date (mm/dd/yyyy)

EPA 9029 (Revised 12/21/2017)

MAPS



SITE LOCATION TOPOGRAPHIC MAP

U.S. Geological Survey, Wauseon (2016-12-05) Quadrangle, 7.5 Minute Series

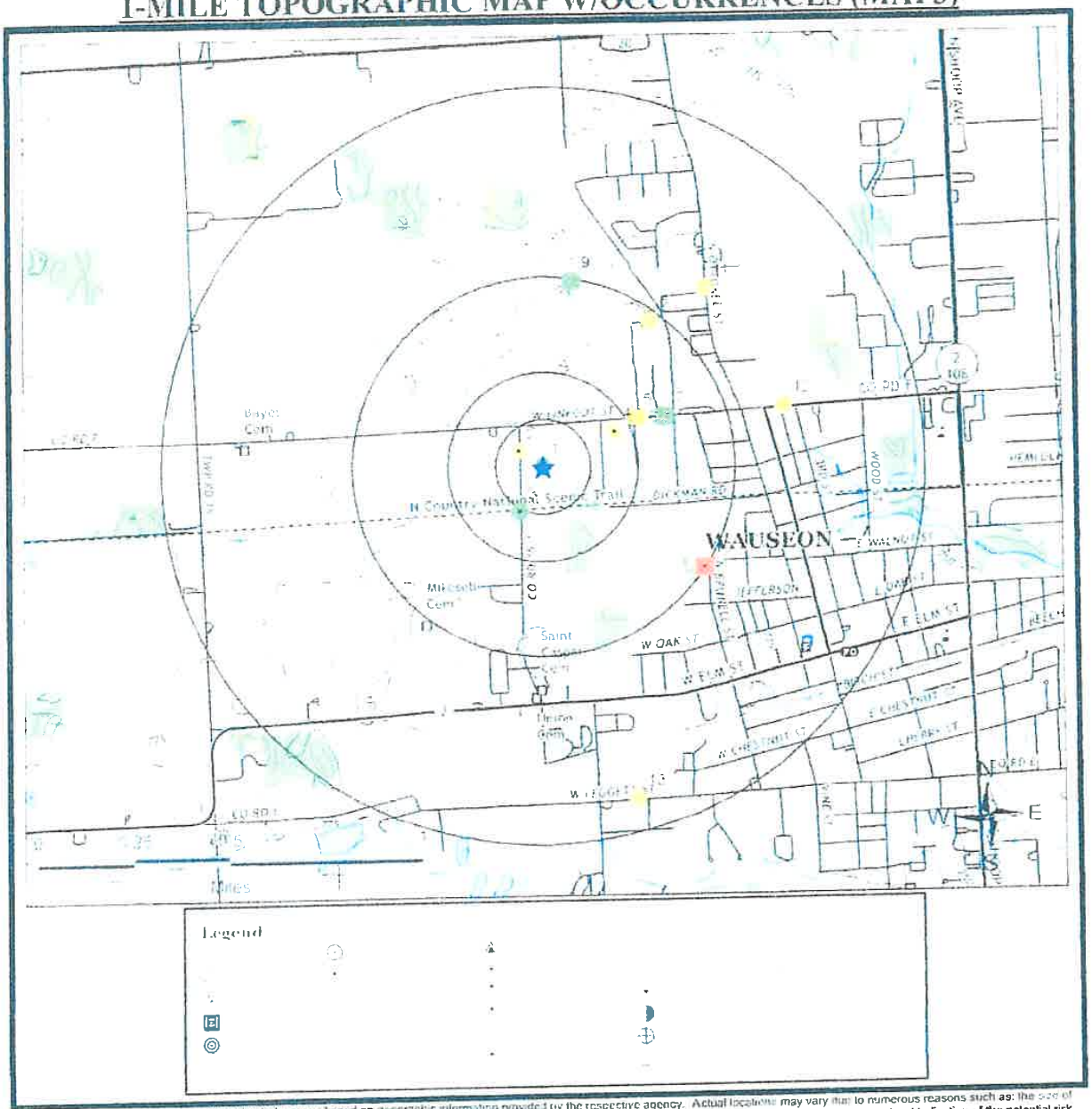
EMES	715 Linfoot Street Wauseon, OH 43567	FIGURE 1 JOB SSB-002 DATE 7/17 2018

OHR 000 108 050
Latitude: 41° 33' 30.636" N
Longitude: 84° 9' 19.62" W

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

ERS

1-MILE TOPOGRAPHIC MAP W/OCCURRENCES (MAP3)



All plotted occurrences represent approximate locations based on geographic information provided by the respective agency. Actual locations may vary due to numerous reasons such as: the size of the property, accuracy of the provided location, accuracy of the software used to determine the location, etc. **Occurrences are shown in three colors to give a visual indication of the potential risk** of the listed occurrence based on the type of list and the current status of the occurrence. Occurrences shown in [illegible] are locations with known contamination that have not received a "case closed" or "no further action" status. Occurrences shown in [illegible] have been listed by the respective agency, but do not always represent an environmental risk. The detailed status information and description of the listing should be reviewed for further information. Occurrences shown in [illegible] are occurrences that have active permits or have had contamination in the past but have received a "case closed" or "no further action" status and therefore, do not likely present an environmental risk.

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

OHR 000 108 050
Part A Application

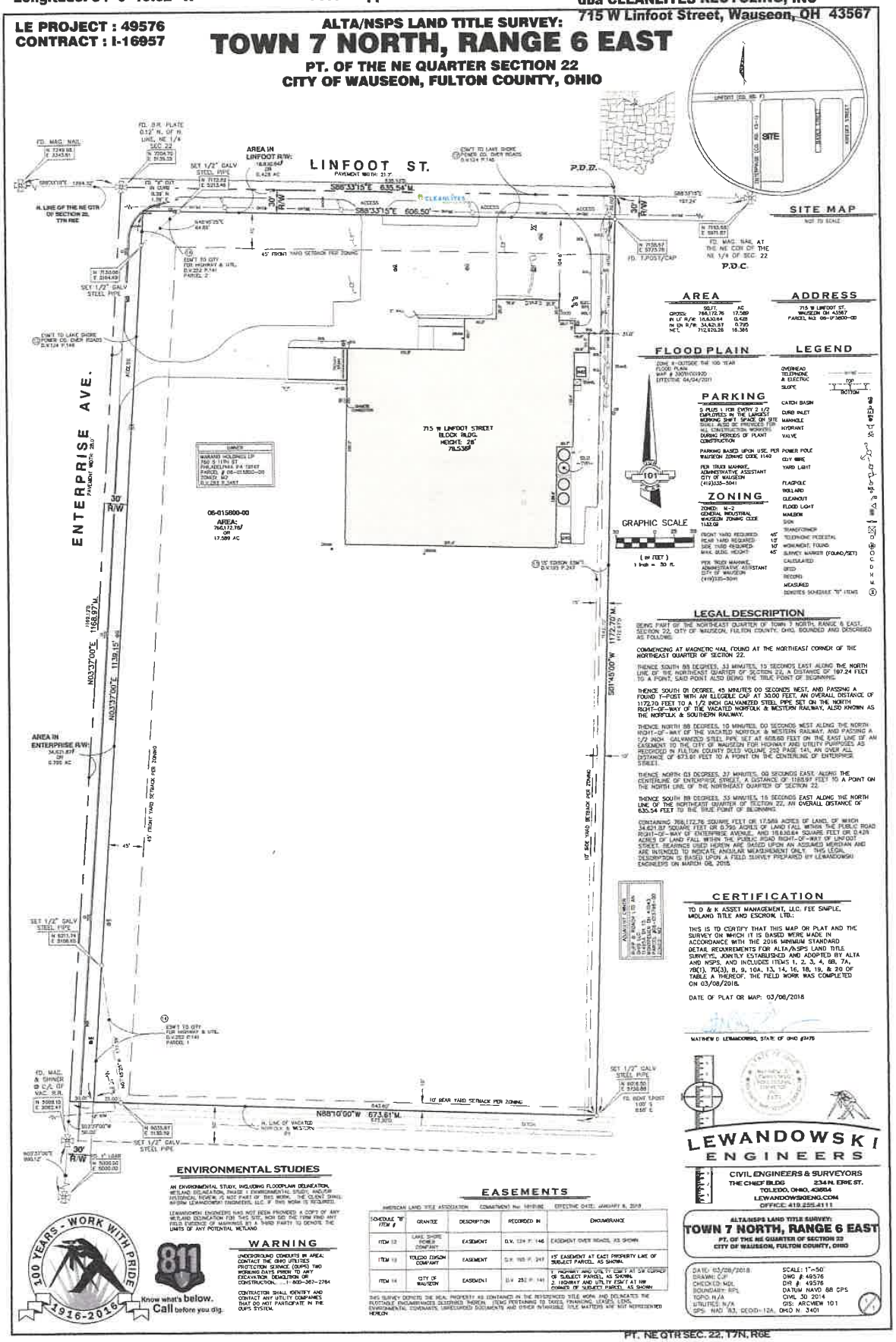
USA Lamp & Ballast Recycling, Inc
dba CLEANLITES RECYCLING, INC
715 W Linfoot Street, Wauseon, OH 43567

LE PROJECT : 49576
CONTRACT : I-16957

ALTA/NSPS LAND TITLE SURVEY:

TOWN 7 NORTH, RANGE 6 EAST

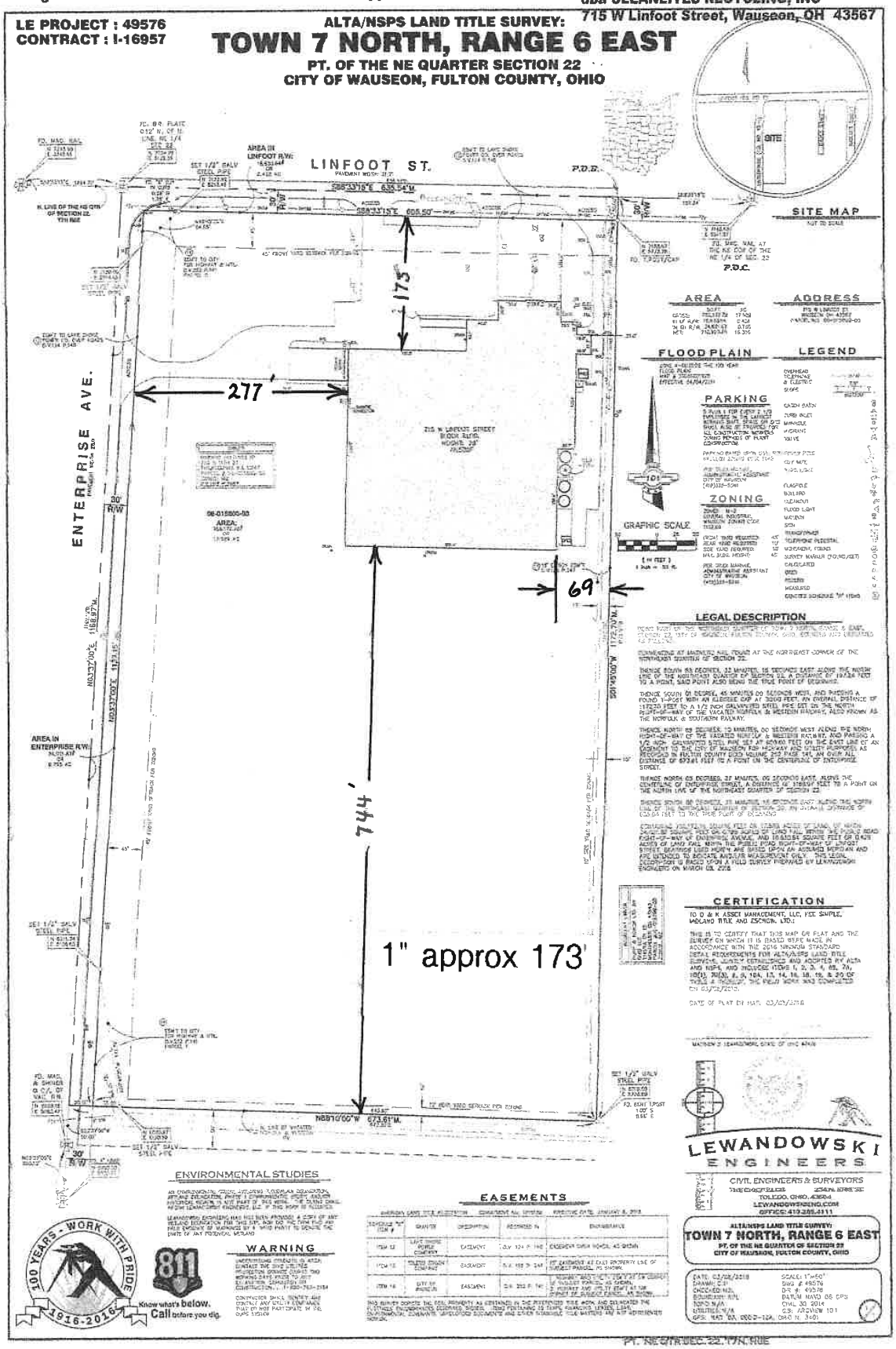
PT. OF THE NE QUARTER SECTION 22
CITY OF WAUSEON, FULTON COUNTY, OHIO



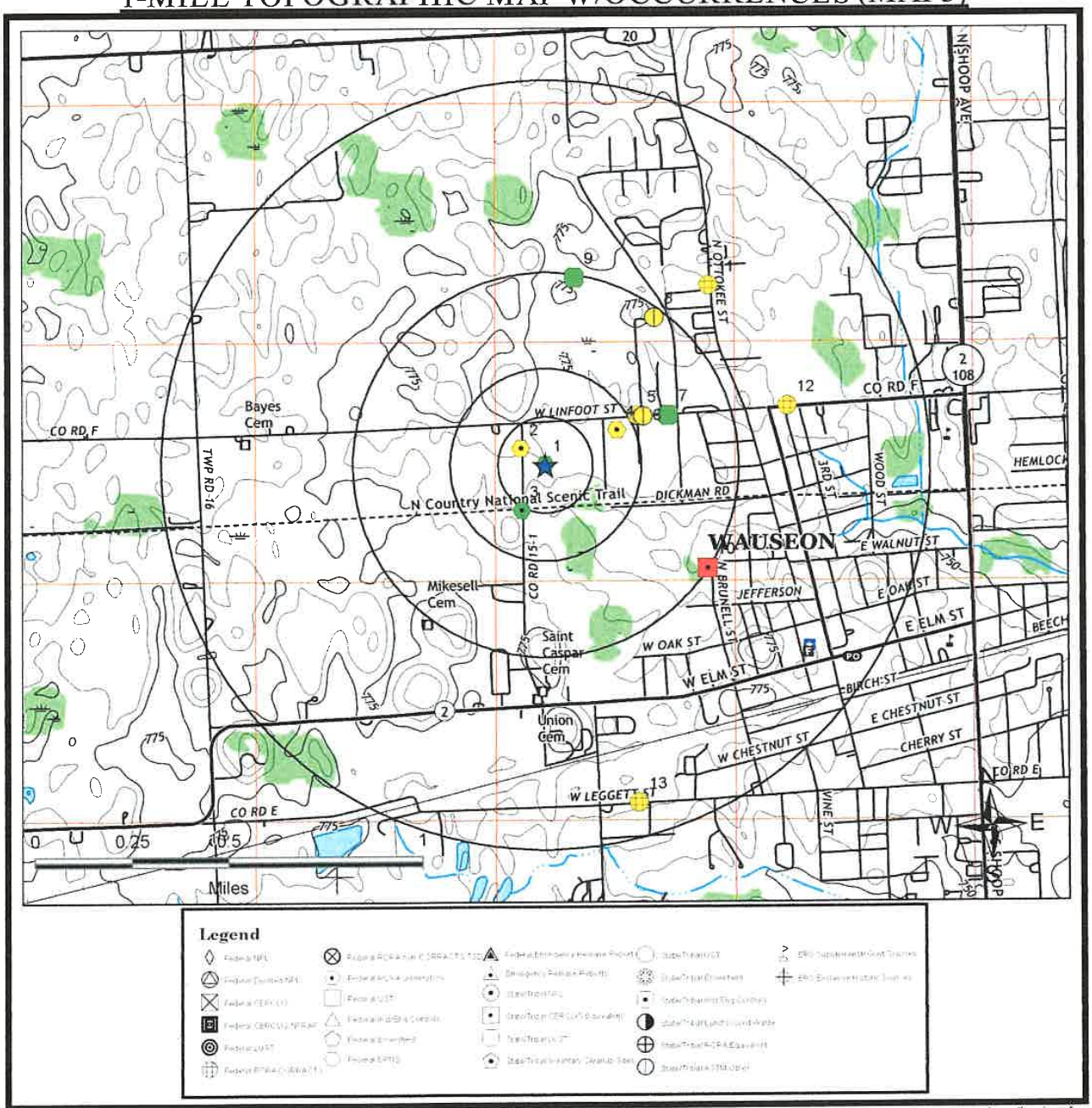
Latitude: 41° 33' 30.636" N
Longitude: 84° 9' 19.62" W

OHR 000 108 050
Part A Application

USA Lamp & Ballast Recycling, Inc
dba CLEANLITES RECYCLING, INC
715 W Linfoot Street, Wauseon, OH 43567



1-MILE TOPOGRAPHIC MAP W/OCCURRENCES (MAP3)



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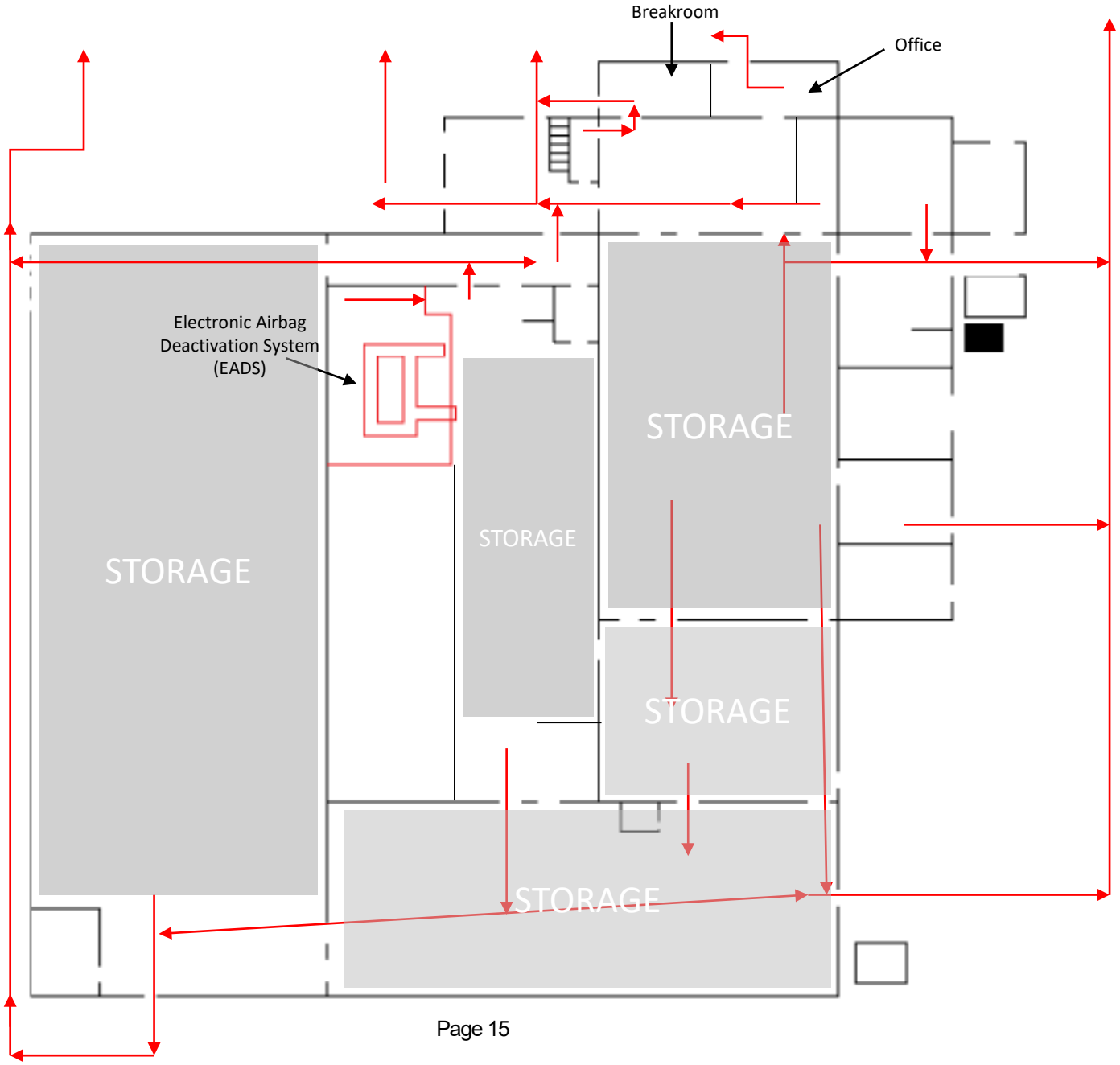
FIGURES

N

Part A
Figure 1

FACILITY MAP
Emergency Exits

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



USA Lamp & Ballast Recycling, Inc.
dba Cleanlites Recycling, Inc
OHR 000 108 050
715 W. Linfoot Street
Wauseon, OH 43567
(419) 330-1932
wauseon@cleanlites.com

Mason, MI • Lakeville, MN • Cincinnati, OH
• Wauseon, OH • Spartanburg, SC
(517) 676- 0014 cleanlites@cleanlites.com
www.cleanlites.com

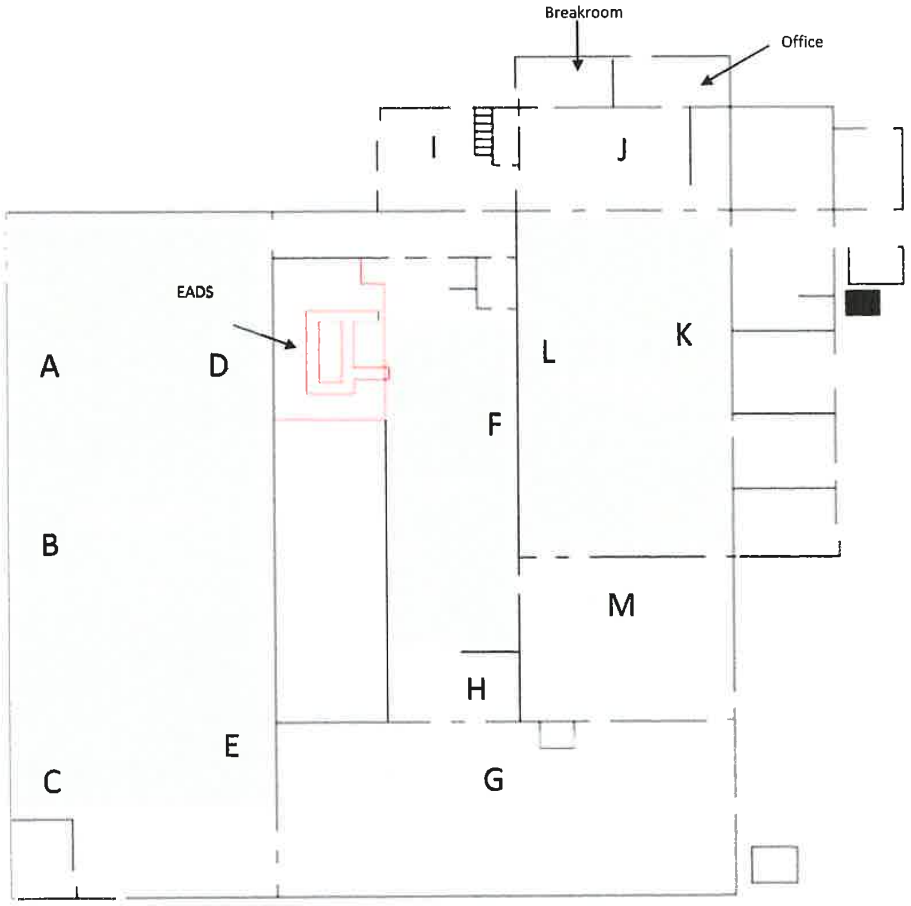
N

Part A
Figure 2

FACILITY MAP- Storage Areas

USA Lamp & Ballast Recycling, Inc.
OHR 000 108 050
715 W. Linfoot Street
Wauseon, OH 43567

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



A- Scrap Material

B- Magazines for Ignitor Storage

C- Misc. Storage

D- Sorting and Receiving Storage

E- Misc. Storage

F- Pre- Processing Storage

G- Class 9 Airbag and Commercial Chemical by- product Storage

H- Baghouse

I- Weigh Station

J- Clock- in Station

K- Empty Drums

L- Airbag Processing Station

M- Storage for Extra Boxes and Cut-Off Airbags

Mason, MI • Lakeville, MN • Cincinnati, OH
• Wauseon, OH • Spartanburg, SC
(517) 676- 0014 cleanlites@cleanlites.com
www.cleanlites.com

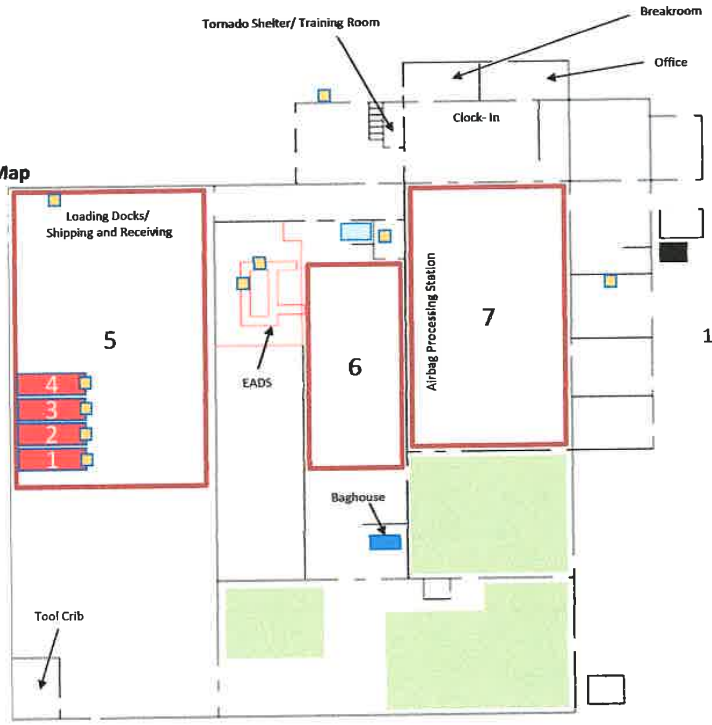
N

Part A
Figure 3

FACILITY MAP-
Hazardous Waste Airbag Storage Map

USA Lamp & Ballast Recycling, Inc.
OHR 000 108 050
715 W. Linfoot Street
Wauseon, OH 43567

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



1-7 Marked for Sections of Hazardous Storage

Shipping/ Unloading, possible short term Hazardous Waste Storage

Class 9 and Commercial Chemical By- product Airbag Storage

Hazardous Airbag ATF Storage

Warning Signs

Hazardous Waste Airbag Storage Areas Description

Storage Areas 1-4 each consist of a 40-foot by 8-foot heavy duty shipping container with locking doors and approved by the ATF for storage of airbag inflators. These units are referred to as magazines. The maximum storage capacity of each of these units is 44 cubic yards for a combined total of 176 cubic yards. This is based upon a single row of pallets stacked two (2) pallets high.

Storage Area 5 is the balance of the room where the magazines are located. This area may be used for temporary storage as a truck off-loading staging area and a sorting area for materials received. The room is 173 feet x 97 feet less the area taken by the magazines. The total storage capacity of this area is 2,797 cubic yards based upon stacking two (2) pallets high and includes the magazine capacity.

Storage Area 6 is located adjacent to the Electronic Airbag Deactivation System (EADS). Hazardous airbags may be temporarily stored in this 40-foot by 60-foot area awaiting deactivation. The total capacity of this area is 400 cubic yards.

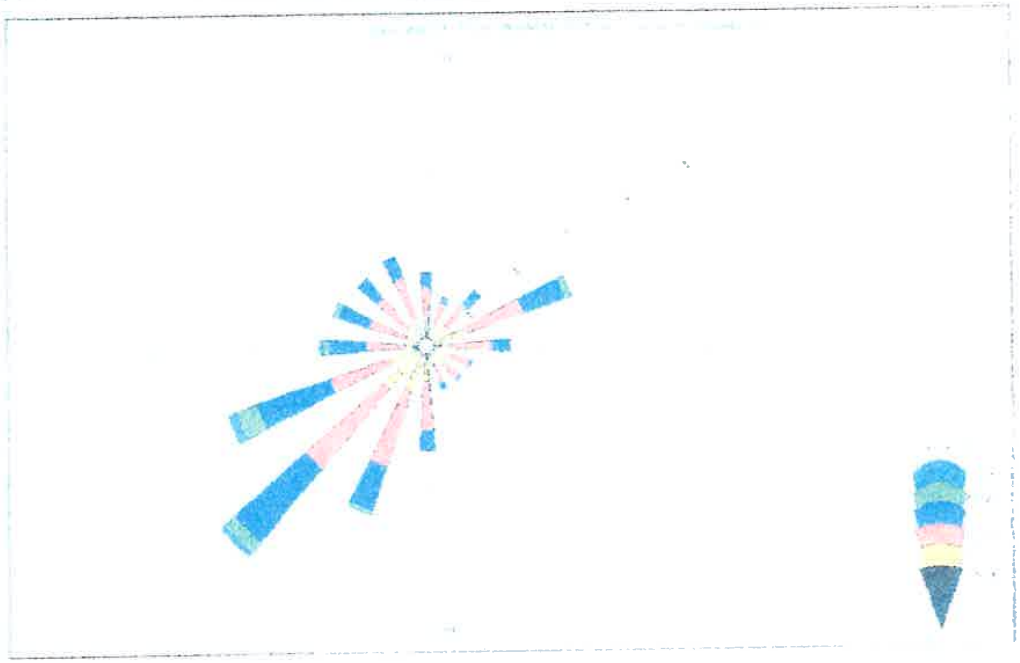
Storage Area 7 is located in the disassembly room where airbag modules are disassembled. There is a possibility that hazardous waste airbags may be stored in this area temporarily while awaiting disassembly and/or deactivation. This room is 118-feet by 79-feet and has a maximum storage capacity of 1,554 cubic yards.

The total hazardous waste storage capacity of the seven (7) hazardous waste storage areas is 4,751 cubic yards.

Part A
Figure 4

Windrose Plot for Toledo Express Airport

Toledo, OH



Mason, MI • Lakeville, MN • Cincinnati, OH
• Wauseon, OH • Spartanburg, SC
(517) 676- 0014 cleanlites@cleanlites.com
www.cleanlites.com

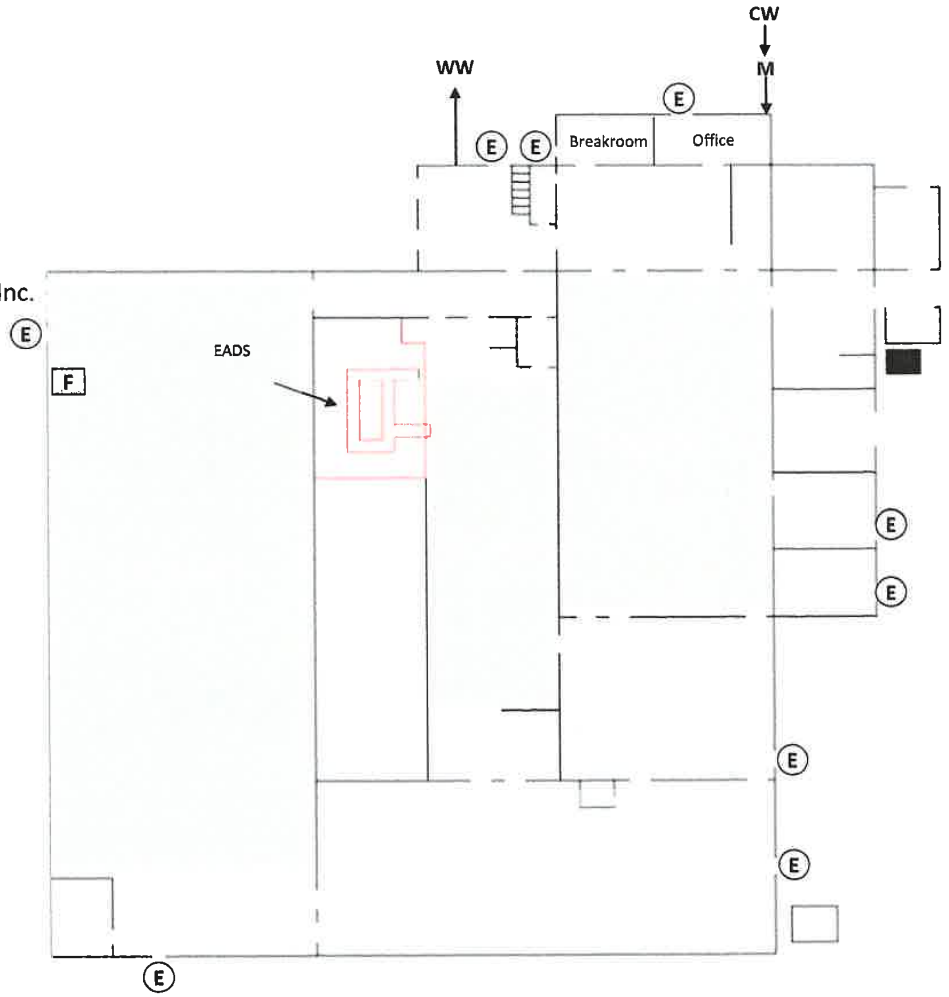
N

Part A
Figure 5

FACILITY MAP- Utilities

USA Lamp & Ballast Recycling, Inc.
OHR 000 108 050
715 W. Linfoot Street
Wauseon, OH 43567

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



CW – City Water

E – Emergency Exits

F – Fire Suppression System

M – Water Meter

WW – Wastewater to City Sewer

All storm water flows to Municipal Storm Sewer

PHOTOGRAPHS

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

USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc OHR 000 108 050

EMES CONSULTING LLC	**SITE MAP** **715 WEST LINFOOT STREET** **WAUSEON, OH 43567**	**PROJECT CODE: SSB-002** **DRAWN BY: JT** | **DATE: 1/29/18**

Part B Permit Application
Subsection A

SITING CRITERIA DOCUMENT

USA LAMP & BALLAST RECYCLING, INC

dba CLEANLITES RECYCLING, INC
715 West Linfoot Street
PO Box 381
Wauseon, Ohio 43567
419.330.1932 phone | 517.676.4449 fax
wauseon@cleanlites.com

9/30/2022

Table of Contents

1.0 Introduction

USA Lamp & Ballast Recycling, Incorporated ("USA Lamp", "facility", "site", or "property") is a hazardous waste facility specializing in the management, and recycling of all types of automotive airbags and airbag inflators. Effective on September 25, 2019, USA Lamp & Ballast Recycling, Inc. received an exemption from the State of Ohio, that authorized the facility to store hazardous waste in containers and treat hazardous waste, pending approval of a Part B Permit.

2.0 Nature and Volume of Waste [OAC 3745-50- 38(A)(1)]

The materials received by USA Lamp & Ballast Recycling, Inc., including wastes, consist of Airbags and Airbag components, which are considered hazardous waste articles. Some of the materials may contain characteristic waste codes D001 and D003 and will be identified as hazardous wastes. However, some of the materials may not be considered hazardous waste upon receipt or after recycling (e.g. scrap metals, non-regulate materials/ excluded/ exempt solid wastes, and universal wastes). The types of Airbags and Airbag components accepted by USA Lamp & Ballast Recycling, Inc., all of which may be identified as a hazardous waste unless otherwise indicated, include but may not be limited to the following:

Airbags:
Whole Airbags
Airbag Inflater's
Seatbelt Pretensioner

Currently, USA Lamp & Ballast Recycling, Inc. allowed to accept materials with characteristic waste codes D001 and D003.

The facility maintains one address which corresponds to the main building at 715 West Linfoot Street, Wauseon, Ohio 43567. Currently there are four storage units, identified as storage units 1 – 4, located within the Linfoot Street building. These units are permitted by ATF to store up to 120,000 pounds (about 280 cu yds) of hazardous airbag components with waste codes D001 and D003. See ATF Application at TAB 14 for details of storage units. Other hazardous waste storage areas in the facility add up to about 4,751 cu yds for a total of 9,760 cu yds.

USA Lamp is also allowed to operate one hazardous waste treatment unit. This unit is referred to an EADS and consists of a conveyer system, a high temperature, rotating deactivation system, a quench tank, and an air pollution control system. The EADS has an annual throughput of 3,900,000 pounds per year, based on 10 hours per day and 5 days per week. See TAB 14 for details of the unit's operation.

3.0 Compliance with Hazardous Waste Rules [OAC 3745-50-38(A)(2)]

Ohio Revised Code (ORC) 3734.12 requires the Director to adopt hazardous waste management regulations that are consistent with and equivalent to the regulations adopted under the Resource Conservation and Recovery Act of 1976 (RCRA). USA Lamp & Ballast Recycling, Inc. current Permit application (and Permit renewal application) addresses these regulations and applicable requirements of OAC 3745-50-43 and 3745-50-44. Refer to the Permit renewal application for a detailed discussion. USA Lamp & Ballast Recycling, Inc. compliance record can also be reviewed.

4.0 Evidence of Minimum Adverse Environmental Impact [OAC 3745-50-38-(A)(3)]

The facility is designed, maintained, and operated in a manner that represents the minimum adverse environmental impact. Waste management and facility operations are performed entirely within the 715 West Linfoot building such that the exposure of materials and wastes to outside elements does not occur. The building is designed to industrial standards, are constructed of concrete block and partial aluminum veneer, and have sprinkler systems. Grading of previous and paved areas of the site is intended to convey precipitation away from building structures and prevent flooding. Roof drains also convey precipitation away from the buildings. The floors of the buildings consist of at least six inches of concrete and in some areas are coated. Areas within the buildings where materials and wastes are stored and processed are equipped with appropriate engineering controls to prevent releases and protect site workers. These engineering controls include containment, fresh air supply, and air exhaust/ capture/treatment.

In addition, USA Lamp is an environmentally conscious company that continuously strives to provide high quality recycling, materials recovery, and management services. USA Lamp considers the release of materials and wastes to be highly unlikely based on the facility's operating procedures and historical record. Since operations began, there have been no releases of materials or wastes which have caused adverse on-site or off-site environmental impact.

5.0 Evidence of Minimum Risk Under Specific Conditions [OAC 3745-50-38(A)(4)]

As discussed below, the USA Lamp facility represents the minimum risk of fires or explosions from treatment and storage; release of hazardous waste during transport; and adverse impact on public health and safety.

5.1 Fires and Explosions

The USA Lamp facility is designed, operated, and maintained in a manner that minimizes the risk of fire or explosions from treatment or storage of hazardous wastes.

In general, the types of hazardous waste managed by USA Lamp (Airbags and Airbag components) do not readily burn. The hazard prevention measure that has the highest likelihood of minimizing risk of fire and explosion of any of the Airbags and Airbag components accepted by USA Lamp is assuring the materials are properly insulated, packaged, and stored properly in the magazines. Beyond proper packing, the automatic sprinkler system has a significant impact on mitigating the potential for fire and explosion. The sprinkler system is regularly inspected and tested. The facility is also in compliance with State and Local fire code.

5.2 Release of Hazardous Waste during Transport

The risk of a release of hazardous waste during transport to or from the facility is considered minimal. However, potential hazards associated with these wastes during transport and at the facility are considered low based on the proper transport of the Hazardous Waste.

The greatest potential for a release associated with transport, although still considered minimal, is during loading and unloading. Loading and unloading usually occurs under the roof of the building structure or against the walls of the building structure such that the exposure of hazardous wastes to outside elements does not occur. Airbags and Airbag components containing no liquids are anticipated to only be unloaded at the 715 West Linfoot which is equipped with docks within the building structure.

5.3 Adverse Impact on Public Health and Safety

USA Lamp minimizes risk of adverse impact on public health and safety consistent with their approach to control adverse environmental impact (previously discussed to include air pollution control technologies, storing wastes in permitted units, and implementing various facility procedures). In addition, USA Lamp has developed procedures for facility preparedness and prevention. The previously referenced section provides a description of emergency equipment and procedures that are in

place to minimize the potential for a release that could threaten human health or the environment. USA Lamp also has established a contingency plan designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of regulated waste or regulated waste constituents to the environment. The contingency plan is presented in USA Lamp & Ballast Recycling, Inc. Permit renewal application. USA Lamp Recycling minimizes the possibility of the unauthorized entry (and potential exposure) of personnel into the active portions of the facility where waste operations take place through appropriate security measures. Security-related information is discussed in USA Lamp Recycling Permit renewal application. As previously discussed, USA Lamp Recycling considers the release of materials and wastes to be highly unlikely based on the facility's operating procedures and historical record.

6.0 Compliance with Air, Water, and Waste Rules [OAC 3745-50-38(A)(5)]

USA Lamp & Ballast Recycling, Inc. complies with ORC 3704, 3734, and 6111 and all rules and standards adopted under them. ORC 3704 pertains to air pollution control. Most operations and activities at the USA Lamp facility produce de minimis air emissions and are exempt from air permitting requirements in accordance with OAC 3745-15-05. However, USA Lamp & Ballast Recycling, Inc. applied for and obtained a permit-to-install and operate (PTIO), due to air emissions requiring an Air Permit. USA Lamp properly operates and maintains all air pollution control equipment associated with de minimis and permitted operations and activities. Changes to facility operations are routinely evaluated to determine applicability and compliance with air pollution control rules and regulations.

ORC 3734 pertains to solid and hazardous wastes. USA Lamp maintains an Ohio Hazardous Waste Facility Installation and Operation Permit for the storage of hazardous waste in containers. For the hazardous waste activities performed by USA Lamp that are exempt or excluded from permitting, applicable regulations are followed. In addition, USA Lamp also follows applicable rules and regulations for large quantity generators of hazardous waste.

ORC 6111 pertains to water pollution control. Currently, USA Lamp Recycling maintains a wastewater permit exemption through Ohio EPA. Changes to facility operations are routinely evaluated to determine applicability and compliance with water pollution control rules and regulations.

7.0 Owner/Operator Compliance with Environmental Regulations [OAC 3745-50-38(A)(6)]

USA Lamp Recycling has been operating at the West Linfoot facility since 2017 and has maintained an Ohio Hazardous Waste Facility Installation and Operation Permit.

USA Lamp is aware of and strives to ensure facility operations are conducted in accordance with all applicable regulations.

8.0 Facility Location Relative to State and National Parks [OAC 3745-50-38(A)(7)]

The USA Lamp Recycling facility is not located within the boundaries of a state or national park as defined in OAC 3745-50-38(A)(7). The closest State Park is Harrison Lake State Park in Fayette Ohio 16 miles away.

SUBSECTION B

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

This subsection 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. Please note that USA Lamp & Ballast Recycling, Inc does business as Cleanlites Recycling, Inc and is referred to as Cleanlites Recycling, Inc throughout the application.

Cleanlites Recycling, Inc is located within the Wauseon, OH city limits. The street and mailing address are:

PHYSICAL ADDRESS	MAILING ADDRESS
Cleanlites Recycling, Inc	Cleanlites Recycling, Inc
715 West Linfoot Street	PO Box 381
Wauseon, OH 43567	Wauseon, OH 43567

Cleanlites Recycling, Inc. acts a destination facility for recalled and/or defective automobile airbags. Airbag inflators are considered a characteristic hazardous waste due to reactivity.

Cleanlites receives both airbag inflators and complete airbag assemblies, by truck, at the Cleanlites facility located at 715 West Linwood Street, Wauseon, OH. The contents of each shipment are inspected and upon approval, they are accepted for storage and/or processing.

The airbag module is the entire airbag assemble and the airbag inflator is the detonation device that inflates the airbag. Airbags that have never been installed in in a vehicle are non-hazardous waste. Airbags, that have been removed from vehicles and shipped from auto dealers, repair facilities, collision centers and salvage yards are hazardous waste unless they meet the terms of the exclusion (40 CFR 261.4(j)). They are then received as non-hazardous waste. Airbags shipped from collection facilities must be received as hazardous waste. Airbags recalled by the NHTSA (Takata, etc.) are received as hazardous waste

The inflators are hazardous waste with codes D001 and D003 as they contain an accelerant, most often ammonium nitrate. The inflators consist of a sealed metal container that that is

wired to be detonated by an electrical charge. They are not subject to detonation by spark, impact, or normal environmental conditions. The deactivation process operates in a range from 600º F to 1100º F (316º C to 593º C). This is sufficiently high to cause the ammonium nitrate to detonate blowing the metal container apart and oxidizing the ammonium nitrate. Should the system temperature vary from this range, the entire system will shut down. Deactivated inflators look like metal shrapnel A visual inspection will determine if inflators were not deactivated.

The complete airbag assemblies are composed of the plastic and mesh airbag, seatbelt pretensioners, and the inflator. These are not considered hazardous waste. These assemblies are taken to the disassembly area where the are separated into components. The plastic and mesh airbags are sent to storage for recycle as are the seatbelt pretensioners. At this point the inflators are treated like hazardous waste and are sent to one of the four ATF approved storage units or directly to the deactivation process.

The inflators are placed in one of the four (4) magazines for storage and accumulation awaiting deactivation. In addition to these four magazines, there are other areas designated for hazardous waste storage. These areas are located (1) in the vicinity of the loading dock, (2) in the vicinity of the disassembly area, (3) in the vicinity of the deactivation process. The total hazardous waste storage requested is 4,751 cu. Yds.

A conveyer belt is used to feed the inflators to the Electronic Airbag Deactivation System. Inflators are moved to the deactivation area by forklift where they are manually moved from the containers to the conveyer. The resulting hot metal parts are moved to a quench tank where water is used to cool the resulting scrap metal. The cooled scrap metal is stored in a roll-off to accumulate for recycling.
Airbags and seat belt pretensioners are transported from the generator to this facility for processing and/or storage. Transportation for Cleanlites Recycling, Inc is handled by properly licensed transporters.

The facility consists of approximately 78,112 square feet on approximately 17.58 acre of land located in a M2 zone.

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

Daniel D. Kimmel
Facility Manager
419.330.1932 office | 517.214.0453 mobile
danielk@cleanlites.com

Michael T. Kimmel
Senior Vice President
517.676.0044 office | 517.204.7111 mobile
mikek@cleanlites.com

Paul Hamann
EHS Manager
513.766.0318 office | 513.441.3825 mobile
paul.hamann@cleanlites.com

B-1a ACCESS CONTROL: Due to the nature of the hazardous waste processed at the facility, security is necessary. All outside doors to the facility, including shipping dock doors are locked at any time that the building is unoccupied. (See Utility Map in Part A) During normal operation, only the main office door and the shipping dock door, when loading operations are in progress or shipping supervisor is physically present, are unlocked. All emergency exits are always locked from the outside. This system is supplemented by security camaras located both inside and outside of the facility.

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

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

Figure B-1 in this subsection 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 of this subsection shows an overview of the facility location.

Follow I-75N to exit 130 E Bluelick Road in Bath Township. Get on US-24 W/US6 W in Liberty Township from Slabtown Rd, OH-65 and OH-109 N. Follow US-24 W /US-6 W to OH -108 N / Scott St in Napoleon. Take the OH-108 exit from US-24 W/US-6 W. Follow OH-108 N to East Linfoot Street and then continue to the facility located at 715 West Linfoot Street in Wauseon.

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

The estimated volume of Airbags and seat belt pretensioners traffic for the Cleanlites 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 three (3) docks in the loading and unloading area. The doors in the loading and unloading area exit to the West end of the building. The overhead doors are open when trucks are entering or leaving the facility, at other times the overhead doors should be closed and access must be monitored by employees. 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.

B-2a (4) Access Road Surfacing:

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

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 are no traffic signals at the entrance of Cleanlites Recycling Inc. at 715 West Linfoot Street.

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 Cleanlites 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)

Cleanlites 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.

Topographic map found in Part A.at TAB 2.

SUBSECTION C

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

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

Cleanlites Recycling, Inc is requesting to be permitted for the storage and deactivation of inflators from defective and/or recalled automotive airbags and seatbelt pretensioners. These inflators contain ammonium nitrate, a reactive material. They are, therefore, a characteristic hazardous waste.

Shipments to the Cleanlites facility arrive by truck. Hazardous v non-hazardous status is determined by criteria found in Subsection B-1 of this application. Appropriate paperwork must accompany the shipment. After a waste shipment has met all the requirements for acceptance as previously stated, the generator will ship the material to the facility. Containers of airbags and seatbelt pretensioners that are not acceptable will be rejected and shipped back to the shipper. Cleanlites does not accept inflators containing Sodium Azide (NaN_3).

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 airbags and seatbelt pretensioners are then moved, by forklift, to a storage area to await processing. Processing involves removing the plastic and mesh airbag and the seatbelt from the assembly leaving only the inflator for deactivation. The airbag and seatbelt materials are placed into storage for shipment to recycle facility. There is no danger of detonating the inflators as the reactive chemical is incased in a sealed metal container designed to be detonated electronically. Inflators are also moved around the plant by forklift.

The inflators are deactivated at this facility resulting in scrap metal. The scrap metal is placed into storage for shipment to metal recycling facility.

C-1a: Containerized Waste
OAC 3745-50-44 (C)(1)(b)(i)

Cleanlites 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. Open totes may only be used to contain complete airbag assemblies. All hazardous waste will be stored in closed containers unless it is currently in-process.

C-1b: Waste in Tank Systems
OAC 3745-50-91 (B)(2), 3745-55-92 (A)(2)

Cleanlites Recycling, Inc is not requesting a permit for the storage of RCRA hazardous wastes in tanks. If Cleanlites 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)

Cleanlites Recycling, Inc is not operating a Hazardous Waste Landfill. If Cleanlites 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)

Cleanlites Recycling, Inc is not operating a Hazardous Waste Incinerator. If Cleanlites 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)

Cleanlites Recycling, Inc is not performing Land Treatment. If Cleanlites 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).

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

Cleanlites Recycling, Inc. plans to operate a Miscellaneous Treatment unit for the deactivation of airbag inflators. Details of the design and operation of this unit may be found in TAB 14.

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)

Cleanlites Recycling, Inc is not seeking to be permitted for a Boiler or Industrial Furnace. If Cleanlites 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)

Cleanlites Recycling, Inc is not seeking to be permitted for a Boiler or Industrial Furnace. If Cleanlites 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)

Cleanlites Recycling, Inc is not seeking to be permitted for a Boiler or Industrial Furnace. If Cleanlites 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).

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)

Cleanlites Recycling, Inc is not seeking to be permitted for a Boiler or Industrial Furnace. If Cleanlites 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)

Cleanlites Recycling, Inc is not seeking to be permitted for a Boiler or Industrial Furnace. If Cleanlites 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)

Cleanlites Recycling, Inc is not seeking to be permitted for a Boiler or Industrial Furnace. If Cleanlites 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 three major steps: Pre-acceptance, In Process (Consolidation), and Off-site Shipment (Alternative Approval) Analysis.

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)

Cleanlites Recycling, Inc. intends to accept wastes for storage prior to the processing of the airbags and seatbelt pretensioners, 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. Cleanlites Recycling, Inc will use analytical and sampling methods from EPA publication SW-846 to respond to RCRA-related sampling and analysis requirements. Cleanlites does not accept shipments of airbags or inflaters containing Sodium Azide.

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 airbags and seatbelt pretensioners, testing and analytical methods for each parameter will be specified and will comply with rules listed in OAC 3745-54-13 (B)(2). Cleanlites 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 methods will be standard methods and accompanied by standard operating procedures. Cleanlites 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. Cleanlites 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, Cleanlites 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 are not currently conducted at the site, however visual monitoring is conducted daily. If sampling and laboratory analysis were to be conducted on-site, Cleanlites 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 Cleanlites Recycling, Inc for processing will be analyzed, with respect to the criteria in Appendix A, Subsection C – Waste Analysis Plan, by Cleanlites Recycling, Inc prior to acceptance. All shipments containing only inflators will be accompanied by a hazardous waste manifest. 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, 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, Cleanlites 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

Cleanlites Recycling, Inc will comply with the requirements listed in OAC 3745-54-13 (B)(6), 3745-54-17 for reactive waste and use analytical and sampling methods from

EPA publication SW-846 to respond to RCRA-related sampling and analysis requirements. The hazardous material, ammonium nitrate, is encapsulated in a sealed metal container and is not accessible for inspection or analysis. Because of this the inflators are not subject to detonation from spark, impact, or any normal operating conditions. As a precautionary measure Cleanlites will require the use of spark proof tools, and grounded metal tables in the processing area. Smoking is not permitted in any of Cleanlites facilities. None of Cleanlites' hazardous waste process areas or storage areas are within 50 feet of the property lines. (See site plan in Part A)

C-3 WASTE ANALYSIS REQUIREMENTS FOR LAND DISPOSAL RESTRICTIONS

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

Cleanlites Recycling, Inc. renders received hazardous waste inert through the Electronic Automotive Airbag Deactivation System. All resulting byproducts from the system are reclaimed and/or recycled. Cleanlites 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 Cleanlites Recycling, Inc for processing will be analyzed by Cleanlites Recycling 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 Subsection C-2e. Cleanlites Recycling will comply with rules listed in OAC 3745-54-13 (A) and will use analytical and sampling methods from EPA publication SW-846 to respond to RCRA-related sampling and analysis requirements.

Cleanlites anticipates a maximum production rate of about 36,000 pounds per day and a daily average of about 15,000 pounds per day. The maximum storage capacity of the facility is 160,000 pounds of nonhazardous automobile air bags and 120,000 pounds of ATF regulated, hazardous automobile air bag inflaters.

Inspections of the facility will be conducted using the forms found in Subsection G Exhibits 2 & 3.

C-3b: Prohibitions:
OAC 3745-270-03 and OAC 3745-270-30 through 39

This subsection does not apply to the facility. Cleanlites Recycling, Inc 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)

Cleanlites Recycling, Inc. has an air emission regulated by air permit #P0125067. In addition, quench water used to cool scrap metal from the deactivation system will be analyzed prior to discharge. Cleanlites 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 subsection does not apply to the facility. If sampling or laboratory analysis is needed in the future, Cleanlites 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 subsection does not apply to the facility. If Cleanlites 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).

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

This subsection does not apply to the facility. If Cleanlites Recycling, Inc were to provide treatment in the future, we would provide procedures for testing the residue (not the extract of such residues) to ensure 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)

The Electronic Airbag Deactivation System (EADS) generates two waste streams. The off gas from the inflator deactivation and salt water from the quench tank. The off gas from the deactivation unit is passed through a high efficiency bag house to remove particulate material from the gas stream. When the pressure drop across the filter reaches a set point, the system will shut down and the filter bags will self-clean. The material from the bag house will be placed in 55 gal drums and analysis will be run prior to disposal.

The water in the quench tank will build up salt concentration as the system operates. Cleanlites is working with the local wastewater system to determine the salt concentration that is acceptable to their treatment system. Once this is worked out the sampling frequency will be determined by the POTW. 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)

Cleanlites 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)

The facility operates a baghouse as part of our air pollution control system. The dust collected by this unit will be analyzed and shipped to an appropriate land fill based upon the results of the analysis. Cleanlites Recycling, Inc will

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 subsection does not apply to the facility. If Cleanlites Recycling, Inc 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)

Cleanlites Recycling, Inc will 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 subsection does apply to the facility. The quench water used to cool scrap metal resulting from the inflator deactivation will be recycled to a point. Periodically the brine resulting from this process will be shipped for treatment.

At this writing the brine has been accepted by Valicor to be treated as non-hazardous waste. A copy of their acceptance is in Appendix B of this subsection Cleanlites Recycling, Inc will 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 subsection does not apply to the facility. If Cleanlites Recycling, Inc 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.

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

This subsection does not apply to the facility. If Cleanlites Recycling, Inc 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 subsection does not apply to the facility. If Cleanlites Recycling, Inc 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 subsection does not apply to the facility. If Cleanlites Recycling, Inc 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)

Cleanlites Recycling, Inc does not have any restricted waste; therefore, this subsection is not applicable. If Cleanlites 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).

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

Cleanlites Recycling, Inc does not have a Hazardous Waste Surface Impoundment; therefore, this subsection is not applicable. If Cleanlites 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

Cleanlites 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

Cleanlites 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

Cleanlites 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

Cleanlites 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.

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

Cleanlites 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

Part B Permit Application

Subsection C – Waste Characteristics

WASTE ANALYSIS PLAN

USA Lamp & Ballast Recycling, Inc
dba Cleanlites Recycling, Inc
715 West Linfoot Street
Wauseon, Ohio 43567
419.330.1932 phone | 517.676.0044 fax
wauseon@cleanlites.com email

9/30/2022

1) Background:

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

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

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

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

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

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

2) Waste Description

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

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

Cleanlites anticipates a maximum production rate of about 36,000 pounds per day and a daily average of about 15,000 pounds per day. The maximum storage capacity of the facility 4,751 cubic yards of EPA regulated hazardous automobile air bag inflaters.

3) Waste Analysis Plan

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

Quench water

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

Bag House

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

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

Waste Profile

Customers are required to provide a completed Waste Profile form prior to shipping materials to the facility. A copy of this form may be found at Attachment A of Subsection C.

Rejection Plan

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

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

Annual Review:

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

4) Cleanlites Recycling, Inc Procedure:

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

Cleanlites Recycling, Inc will visually check the following:

- Shipment is consistent with the supply papers
- There are no unusual circumstances with the packing
- There are no obvious signs of significant damage or stress with the packaging.
- Airbags containing sodium azide will be rejected and returned to shipper.

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

Daily Operation Check:

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

- Safety – Proper grounding of equipment, EADS, and ancillary equipment guards, if required, are on, in place and structurally sound.
- PPE and spill response equipment available and in good working order.
- Emergency response communication methods (walkie talkies) available and in good working order.
- Automotive airbag storage - ensure there are no unusual circumstances such as severely damaged packaging or other indicators representing a potential safety or environmental issue.

- Fire Extinguishers - checked visually daily. Monthly inspections documented per OSHA requirements.
- Ensure no open flames or sparking equipment are within 25 feet of any automotive airbag storage.
- Check outside conditions for any exposure or unusual conditions.
- Maintain aisle space to allow the free movement of emergency response equipment around containers storing hazardous waste. The ATF containers will comply with applicable ATF requirements.
- Check EADS for proper operation.

SUBSECTION 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 boxes. Customers send items to Cleanlites Recycling, Inc 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. Air bags and set belt pretensioners 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)

Boxes:
Boxes of all sizes. The boxes are new and used.

Dimensions of the boxes provided by the customers will vary depending on the airbag and seat belt pretensioners manufacturer.

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. Containers will be stored so all labels are visible from the aisle.

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.

Movement of containers holding hazardous assembled airbags and/or inflators require special handling. Ammonium nitrate is very sensitive to heat and/or electrical discharge. When transporting these containers from the loading dock to the storage magazines or the disassembly area, the path will ensure a separation of at least 25 feet from any potential source of heat or electrical discharge including static discharge. The same requirement shall cover transportation from the storage magazines to the deactivation processing area. Movement of hazardous waste containers is shown in Exhibit 1 of this subsection and movement of non-regulated containers is shown in Exhibit 2 of this section.

Movement of hazardous waste containers through the facility will be tracked throughout the process. Upon arrival, each hazardous waste container will be inspected and assigned a unique identifier. The containers will then be moved to one of the four ATF magazines where the information will be recorded on the “Incoming Airbag Explosive (DSMT) Form”, Exhibit 3A of this subsection, located on the inside of the door. When removed from the magazine, the “Incoming Airbag Explosive Form” will be annotated with the date and disposition, Disassembly (D) or EADS (P), of the container. If the container goes to Disassembly, the information will be noted on the “Hazardous Airbag Disassembly Form”, Exhibit 3B of this subsection, located in the disassembly area. When a container is moved to the EADS, the “Hazardous Airbag Disassembly Form” will be annotated and the “Hazardous Airbag Processing Form”, Exhibit 3C, located at the EADS, will be filled out. If a container is moved directly from the magazine to the EADS, the “Hazardous Airbag Processing Form”, Exhibit 1C of this subsection, will be filled out. Once all the contents of a container are processed, the “Hazardous Airbag Processing Form” will be Completed. In the event that a hazardous waste container must be returned to the magazine, from either the disassembly area or the EADS, an “R” will be added to the end of the containers’ unique identifier and the returned container will be logged into the

magazine under the modified number. The source of the container, D or P, will be used as the HazWaste Manifest Number. Efforts will be made to process returned containers as soon as possible.

The sensitivity of ammonium nitrate is increased by contamination with dust, oil, and other organic materials. Although Cleanlites normally handles encapsulated material, it is possible, due to leakage or rupture, for free ammonium nitrate to occur. This material should be cleaned up and disposed of immediately.

The facility should be cleaned regularly to prevent the build-up of dust, oily residues and any other organic materials that may increase the reactivity of the ammonium nitrate should the case arise.

The Wauseon site uses four cargo shipping containers for hazardous waste storage magazines. Each of the containers is 8’ wide x 9’ tall x 40’ long and have a capacity of 79 cu yds each. The total hazardous waste air bag storage capacity is 1,780 cy yds.

Cleanlites does not receive, ship, store, process, or otherwise use any materials that would be incompatible with the hazardous air bags.

Storage areas are visually inspected continuously throughout the day for leaks or deteriorated boxes, pails or drums. A weekly drum inspection, found in Section G, Exhibit 2 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.

A copy of Automotive Airbag Policy may be found at Attachment A to this Subsection.

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

Cleanlites 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)

Cleanlites Recycling, Inc obtains recycling order forms, shipping papers and/or waste manifests describing the wastes prior to acceptance and maintains a file of SDS Sheets which document the absence of free liquids. Cleanlites Recycling, Inc conducts visual inspections of containers in the Storage Area 5 to verify the absence of free liquids and to safeguard against contamination.

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.

Cleanlites Recycling, Inc 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)

Cleanlites Recycling, Inc does not accept containers with Free Liquids. Any containers found with Free Liquids will be rejected.

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

Cleanlites Recycling, Inc does not have a Tank System; therefore this subsection is not applicable. If Cleanlites 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 Subsection does not apply to the Cleanlites Recycling, Inc facility. If this changes in the future, Cleanlites 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)

Cleanlites Recycling, Inc does not accept Free Liquids. If Cleanlites 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)

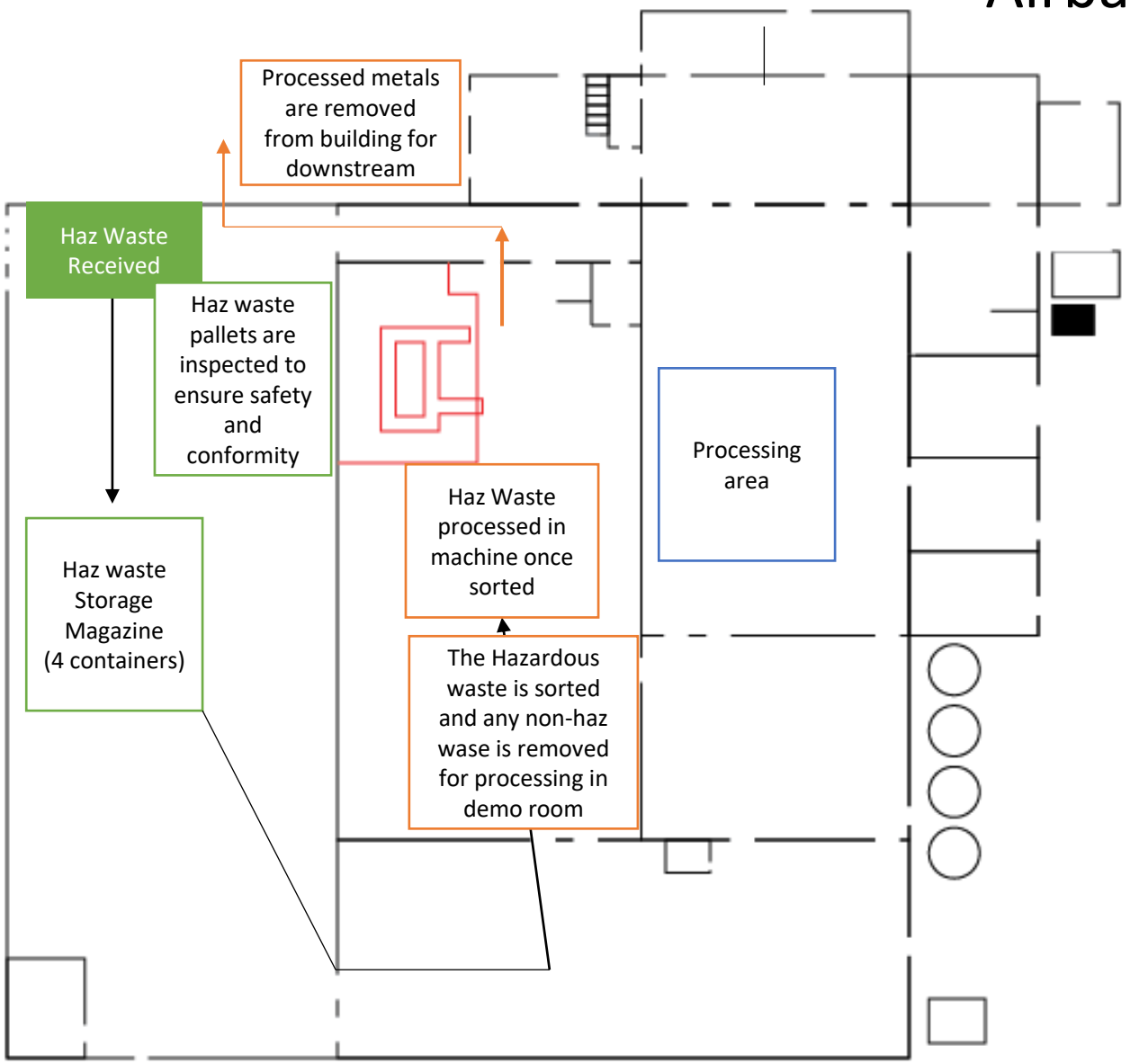
This subsection does not apply to Cleanlites Recycling, Inc. If this changes in the future, Cleanlites Recycling, Inc will comply with OAC 3745-205-100 (D) & (E), 3745-205-101 (C) & (D).

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

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

Hazardous Waste Airbag Movement

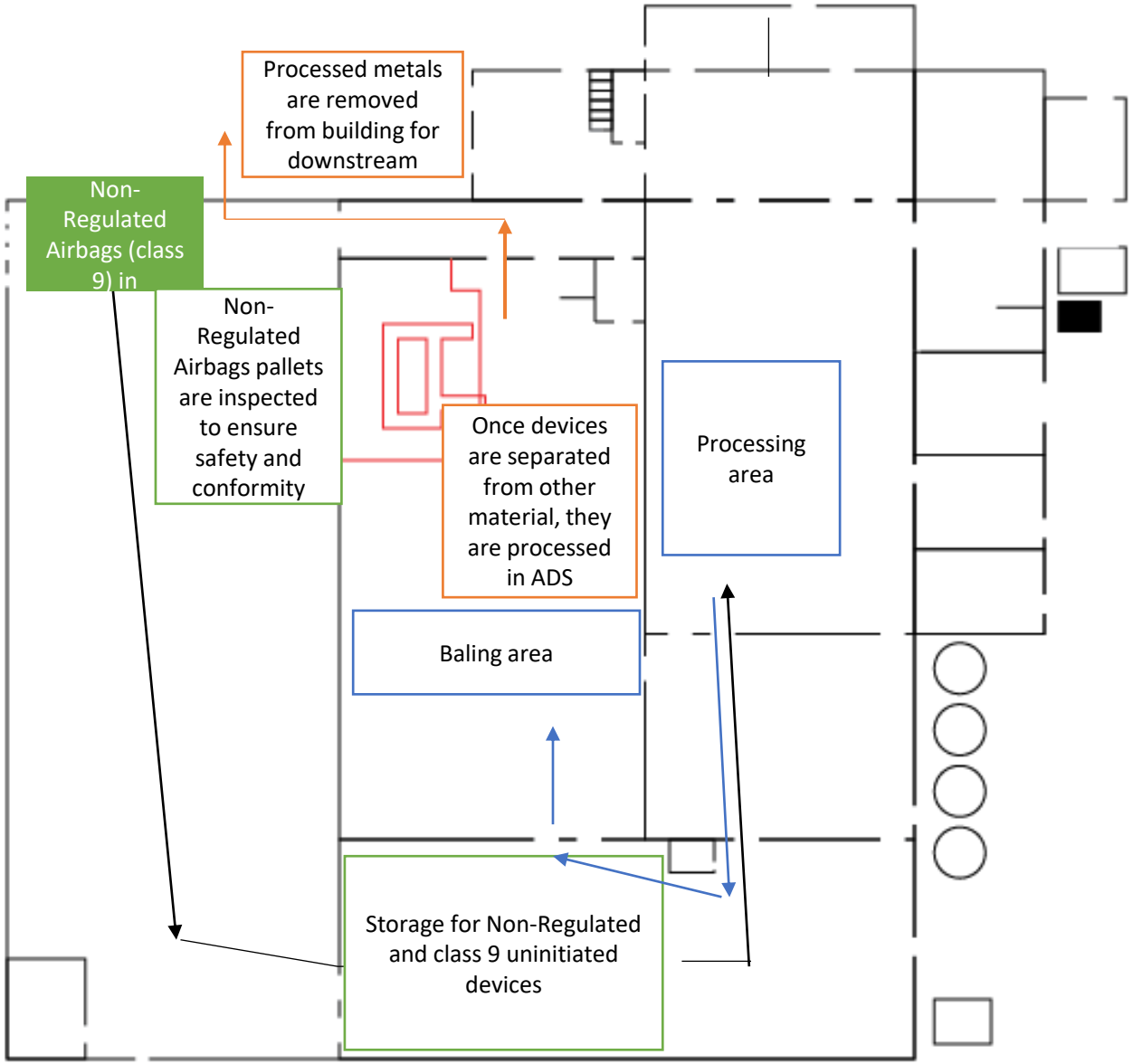
WASEUON, OHIO FACILITY 715 LINFOOT ST.



Subsection D
Exhibit 1

Non-Regulated Airbag Movement

WASEUON, OHIO FACILITY 715 LINFOOT ST.



Subsection D
Exhibit 2

Exhibit 3A

Incoming Airbag Explosive (DSMT)

Date Received:	Hazardous Manifest #:	Drum Identification:	Gross Weight:	Explosive Weight:	Disposition Date:	Location Sent: (D/P) *

Notes:

*D = Disassembly / P = EADS

Exhibit 3B

Hazardous Airbag Disassembly Form

Date Received at Processing	Drum Identification	Date returned to Magazine	Date sent to EADS	Signature

Notes:

Exhibit 3C

Hazardous Airbag Processing Form

Date Received at EADS	Drum Identification	Destruction (Check)	Date returned to Magazine	Signature

Notes:

1.0 Purpose

To establish guidelines for Airbags, inflators, seatbelt pretensioners and other Airbag components. Policy S-42 will serve to convey elements of the recycling of Airbags, inflators, seatbelt pretensioner's and Airbag components that the organization wishes to emphasize as important, as well as covering QEHS and The Ohio EPA policies. This Policy shall apply to both categories of waste Airbags, inflators, seatbelt pretensioners and Airbag components that the company processes: those received under a hazardous waste manifest, referred to as hazardous waste and those received as DOT hazardous materials but not regulated by RCRA or Ohio EPA, referred to as non-regulated waste.

2.0 Policy Requirements

2.1 Senior Management shall establish and implement policies appropriate to its operation and to support the Quality, Environmental Health and Safety management system.

2.2 The policy will be communicated and made available to employees, the public, suppliers, customers, contractors, and all other interested parties.

2.3 The policy will communicate the proper procedures for managing Hazardous Waste inflators, Airbags, and components as well as non-regulated Airbag, Airbag inflators, seatbelt pretensioners and Airbag components.

2.4 The policy will track the Hazardous Waste and non-regulated Airbags and components from the time received at Cleanlites Recycling Inc to the end of life of the materials.

2.5 All policies shall be reviewed and revised as necessary and disseminated at least on a yearly basis. If this policy is updated or changed the Ohio EPA will be notified.

3.0 QEH&S Policy Procedures

Cleanlites Recycling continually invests in our employees, equipment, facilities, and customers while offering an environmentally sound and financially affordable solution to the proper recycling of Airbags, inflators, seat belt pretensioner's and Airbag component's waste streams. The following is the proper procedure for receiving, inventorying, storage, material breakdown and deactivation of hazardous material and hazardous waste Airbag, Airbag inflators, seatbelt pretensioners and Airbag components.

3.1.1 Airbag, Airbag inflators, seatbelt pretensioners and Airbag components are received at the Cleanlites Recycling in Wauseon Ohio.

3.1.2 Cleanlites trained personnel will inspect the materials to ensure that the materials received match those listed on the Bill Of Lading (BOL) or Hazardous Waste Manifest.

If the materials received do not match the BOL or Hazardous Waste manifest, Cleanlites Recycling Inc will contact the sender to ensure no errors were made on the paperwork, the BOL or Hazardous Waste Manifest. If the discrepancy is a paperwork error the material will be accepted. If the materials are incorrect the materials will be returned to the sender.

3.1.3 If the manifest and the materials match, the materials will be weighed.

3.1.4 The materials will be classified as Hazardous Waste or non-regulated waste.

3.1.5 The Hazardous waste is regulated by the Ohio EPA. The drums and containers will be inspected for damage. If damage is found the materials will be repacked in damage free containers. Aisle space will be maintained between drums to ensure proper inspections can be performed and the labels are visible during inspection as well. The labels with the following information: "Hazardous Waste", generator name, manifest number, profile number, and the weight will be placed on the new drum or container. The Hazardous Waste will be placed in one of the four magazines. The hazardous waste drums will be logged on an inventory sheet, Exhibit 1A of this Document, with each magazine.

3.1.6 The non-regulated Airbags, Airbag inflators, seatbelt pretensioners and Airbag components are not regulated by the Ohio EPA. The drums and containers will be inspected for damage. If damage is found the materials will be repacked in damage free containers. Labels with the following information: "Non-Regulated Waste", generator name, BOL number, profile number, and the weight will be placed on the new drum or container. A check sheet will be kept in place for all the materials that are received. The Hazardous Waste Airbags, Airbag inflators, seatbelt pretensioners and Airbag components will then be stored in the storage area of the warehouse.

3.1.7 When the non-regulated wastes are to be recycled, the materials are moved from the storage areas and taken to the Materials Breakdown area if the materials need to be broken down. The inventory log will be updated as required.

3.1.8 The non-regulated wastes are taken apart to remove the inflators from the plastics, airbags, and other peripheral materials. These materials are sorted and placed in gaylords with like materials for recycling.

3.1.9 The inflators are taken to the recycling area. The inflators are manually placed on the conveyor belt that feeds into the Electronic Airbag Deactivation System.

3.1.10 The Hazardous Waste inflators are moved directly from the magazines to the Electronic Airbag Deactivation System where they are manually placed on the feed conveyor belt. The inflators that are removed will be processed by the end of the working day or they will be returned to the magazine and locked.

3.1.11 The Electronic Airbag Deactivation System Heats up to 600 F to 1,100 F causing a chemical reaction, resulting in the deactivation of the inflators.

3.1.12 After deactivation, the scrap metals from the inflators are passed through a water bath to cool the hot metal.

3.1.13 The scrap metal is placed in a metal container to be dumped in a roll off for the recycling.

3.1.14 Materials flow charts for both hazardous waste and non-regulated waste are found at Attachment A to this SOP.

4.0 Health and Safety

At Cleanlites Recycling, we believe that integrating health and safety into every operation at our corporation is of the utmost importance. The health and safety of our employees continues to be the first consideration in our operations.

To this extent, Cleanlites Recycling strives to comply with all applicable laws and regulations that govern our operations. In so doing, we conduct our processes and operations in a manner that reduces or eliminates the conditions that are unhealthful or could cause injury to our employees. Employees are consistently urged to report unsafe conditions in their workplace and to work with Cleanlites Recycling management to eliminate these conditions where they may exist.

Record of Revisions

Revision Date	Revision	Description	Sections Affected
02/09/21	A	Initial Release of Document	All
03/18/21	B	Based on Comments from Ohio EPA	1, 2.3, 2.4, 3.1
04/09/21	C	Comments from Ohio EPA	3.1.2,3.1.3,3.1.6,3.1.11,3.1.14

Record of Approval

Task	Name/Signature	Job Title	Date
Written By:	Benny Coyt	EHS Manager	02/09/21
Approved By:	Mike Kimmel	VP	02/09/21
Revised By:	David Dempsey	EHS Manager	03/18/21
Approved By:	Mike Kimmel	VP	
Revised By:	Benny Coyt	EHS Manager	4/9/21
Approved By:	Mike Kimmel	VP	4/9/21

Part B Permit Application
Subsection E Omitted

SUBSECTION E

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

SUBSECTION F

F-1: SECURITY

This Subsection 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 Cleanlites 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; Cleanlites Recycling, Inc does not request a waiver. If Cleanlites 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; Cleanlites Recycling, Inc does not request a waiver. If Cleanlites 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; Cleanlites Recycling, Inc does not request a waiver. If Cleanlites Recycling, Inc were to request a waiver, we would comply with OAC 3745-50-44 (A)(2).

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

The following subsections detail Security Procedures and Equipment at the Cleanlites Recycling, Inc Facility.

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

Per Subsection 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. All doors and other accesses to the building and the security system will be checked daily.

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

The Cleanlites Recycling, Inc Contingency Plan (Subsection G) 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 Cleanlites Recycling, Inc Contingency Plan (Subsection G) details the Barriers and Means to Control Entry to the facility.

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

The Cleanlites Recycling, Inc Contingency Plan (Subsection G) details the warning signs posted in and around the plant. Warning signs will be checked weekly.

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

Cleanlites Recycling, Inc conducts regular inspections (performs daily checks and documents weekly and / or monthly in inspection log(s)) 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.

Cleanlites 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 Exhibits 2 and 3 of the Contingency Plan in Subsection G.

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

Cleanlites Recycling looks for the following types of problems within the facility during normal operations:

- Damaged containers which may be used to ship materials to the facility;
- Damaged or malfunctioning pallet handling equipment;
- Structural damage;
- Security breaches;
- Safety and emergency equipment
- Alarm system / security devices
- Loading and Unloading areas free of spills / leaks;
- Any potentially unsafe workplace conditions;

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

Cleanlites Recycling's Contingency Plan (Subsection G) specifies the frequency of inspection for the container storage portion of the plant.

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

Cleanlites Recycling's Contingency Plan specifies the Remedial Actions for incidents in their Contingency Plan, which is included as Subsection G. 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)

Cleanlites 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 Subsection G. Examples of the Inspection Logs are located in Exhibit 3 of the Contingency Plan.

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

Cleanlites 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 Cleanlites Recycling, Inc Contingency Plan included as Subsection G. Weekly and Monthly Inspection Forms are contained in Exhibits 2 and 3 of the Contingency Plan.

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

Cleanlites Recycling does not have a Tank System; therefore, this subsection is not applicable. If Cleanlites 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)

Cleanlites Recycling, Inc does not have Surface Impoundments; therefore, this subsection is not applicable. If Cleanlites 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

Cleanlites Recycling, Inc does not have Waste Piles; therefore, this subsection is not applicable. If Cleanlites 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)

Cleanlites Recycling, Inc does not have Land Treatment Units; therefore, this subsection is not applicable. If Cleanlites 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

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

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

Cleanlites Recycling, Inc does not operate an incinerator; therefore this subsection is not applicable. If Cleanlites 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

Cleanlites will conduct regular inspections, both visual and mechanical of the EADS and the air pollution control system. Visual inspections will be conducted daily with mechanical and maintenance inspections weekly. Operation and maintenance records will be reviewed monthly and will be retained for 3 years.

The current operational range for the deactivation unit will be 600° F to 1100° F. This range may be changed based upon operational requirements.

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

Cleanlites Recycling, Inc does not request an exemption from Preparedness and Prevention Requirements. If Cleanlites 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)

Cleanlites Recycling, Inc does not request an exemption from Preparedness and Prevention Requirements. If Cleanlites 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 for prevention of hazards are presented in the Cleanlites Recycling, Inc's Contingency Plan which is included as Subsection G.

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

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

The facility has a telephone and will contact 911 in the event of an emergency. There is continual video monitoring of the airbag processing area, the seven (7) storage areas, the west receiving area and the front entrance. Typically, two or more employees work together in the airbag 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 training room / tornado shelter. Additionally, all drivers and the Facility Manager carry mobile phones.

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, and personal protection equipment for the protection of the personnel, facility and the environment. A list of the Emergency Equipment is included as Attachment 6 to the Contingency Plan. A map (Exhibit 1 of the Contingency Plan) of the location of emergency equipment, and evacuation routes from the plant is included in the Cleanlites Recycling, Inc Contingency Plan, which is included as Subsection G.

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 west side of the building near the loading dock. Another hydrant is located across the street from the office on the north side 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 a telephone. There is continual video monitoring of the airbag processing area, the 7 storage areas, the west receiving area, and the front entrance The Contingency Plan specifies that in the event of an emergency, the Emergency Coordinator will notify all personnel. Personnel will be notified verbally or via walkie – talkies.

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

Cleanlites 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 seven (7) storage areas are well lighted and kept clean, neat and orderly. Aisles and passageways necessary for unobstructed movement of personnel and equipment are always maintained.

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 Wauseon Police Department is available to direct traffic, handle crowds, and provide security services. The Wauseon Police Department has a copy of the Cleanlites Contingency Plan (Subsection G).

The Wauseon Fire Department will respond to fires and other emergency incidents providing fire protection and rescue services. The Wauseon Fire Department has a copy of the Cleanlites Contingency Plan (Subsection G).

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

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

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 Fulton County Health Center is available to provide medical services. The hospital has a copy of the Cleanlites Recycling, Inc Contingency Plan.

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

Cleanlites 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. Cleanlites 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)

Cleanlites 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.

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 fiber 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)

Cleanlites Recycling, Inc describes the personal protective equipment (PPE) needed in its Contingency Plan (Subsection G), included as Attachment 6.

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

Cleanlites Recycling, Inc. does handle recalled, automobile airbags. These are considered ignitable/reactive and are classified low explosives. Airbags inflators are stored in four (4) magazines within the production facility. Cleanlites Recycling, Inc. operates under ATF Permit Number 4-OH-051-34-2F-01199. A copy may be found at Attachment 1 of this subsection. Takata airbags are shipped as DOT 1.4, hazardous waste, as defined by 49 CFR 173.124.

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

The predominant hazardous/ explosive ingredient in the air bag is ammonium nitrate. With the Electronic Airbag Deactivation System process, inflators are placed inside the Electronic Airbag Deactivation System. The system is operated at a temperature between 600 F (316 C) and 1100 F (593 C) causing autoignition of the propellent in the inflators. The reaction is very close to the same way the inflators are deployed with an electrical charge in a vehicle. When the inflators come out of the Electronic Airbag Deactivation System, they will be circulated through a water quench to cool the metals. After the process is completed in the Electronic Airbag Deactivation System, all the inflators will be deactivated, and nothing will remain but scrap metals.

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

Cleanlites Recycling, Inc has designed the Electronic Airbag Deactivation System process to be very efficient. After the Electronic Airbag Deactivation System process is running full-time the processing of the automotive airbags should flow in accordance with a schedule. If for some reason the process flow has deviated, the automotive airbags

will be fully secured according the ATF requirements 27 CFR Part 55. All employees that handle the automotive airbags have been fully trained on safely handling the automotive airbags. During the setup, Cleanlites Recycling, Inc will be conducting Job Hazard Analysis to determine engineering controls, proper safety procedures and proper safety equipment needed. Job Safety Analysis, noise monitoring, PPE assessments, and proper lifting will be assessed.

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

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

Based on information from ammonium nitrate Safety Data Sheets (SDS) at Attachment A, and from other technical research, Cleanlites has determined that the only potential incompatible waste that may exist at our facility would be dust, oily residues and naturally occurring organic materials that can be minimized with regular cleaning. Cleanlites Recycling, Inc. does not manage, stores nor processes any incompatible wastes at the Wauseon facility.

Part B - Section F - Attachment A

Material Safety Data Sheet

Ammonium nitrate

ACC# 01290

Section 1 - Chemical Product and Company Identification

MSDS Name: Ammonium nitrate
Catalog Numbers: AC205860000, AC205860010, AC205861000, AC205865000, AC423350000, AC423350010, AC423350250, A676-212, A676-500, S75244
Synonyms: Nitric acid, ammonium salt; Norway saltpeter.
Company Identification:

Fisher Scientific
1 Reagent Lane
Fair Lawn, NJ 07410

For information, call: 201-796-7100
Emergency Number: 201-796-7100
For CHEMTREC assistance, call: 800-424-9300
For International CHEMTREC assistance, call: 703-527-3887

Section 2 - Composition, Information on Ingredients

CAS#	Chemical Name	Percent	EINECS/ELINCS
6484-52-2	Ammonium nitrate	> 98	229-347-8

Section 3 - Hazards Identification

EMERGENCY OVERVIEW

Appearance: white to gray to brown solid.
Danger! Strong oxidizer. Contact with other material may cause a fire. Causes eye, skin, and respiratory tract irritation. May cause methemoglobinemia. Hygroscopic (absorbs moisture from the air). Ammonium nitrate when contaminated with oil, charcoal, or other organic materials should be considered an explosive capable of detonation by combustion or by explosion of adjacent explosive materials.
Target Organs: Blood, respiratory system, eyes, skin.

Potential Health Effects
Eye: Causes eye irritation.

Skin: Causes skin irritation.
Ingestion: Ingestion of large amounts may cause gastrointestinal irritation. Methemoglobinemia is characterized by dizziness, drowsiness, headache, shortness of breath, cyanosis (bluish discoloration of skin due to deficient oxygenation of the blood), rapid heart rate and chocolate-brown colored blood.
Inhalation: Causes respiratory tract irritation. May cause methemoglobinemia, cyanosis (bluish discoloration of skin due to deficient oxygenation of the blood), convulsions, tachycardia, dyspnea (labored breathing), and death. Methemoglobinemia is characterized by dizziness, drowsiness, headache, shortness of breath, cyanosis (bluish discoloration of skin due to deficient oxygenation of the blood), rapid heart rate and chocolate-brown blood. Inhalation can cause systemic acidosis and methemoglobinemia.
Chronic: May cause methemoglobinemia, which is characterized by chocolate-brown colored blood, headache, weakness, dizziness, breath shortness, cyanosis (bluish skin due to deficient oxygenation of blood), rapid heart rate, unconsciousness and possible death. May cause digestive tract disturbances.

Section 4 - First Aid Measures

Eyes: Flush eyes with plenty of water for at least 15 minutes, occasionally lifting the upper and lower eyelids. Get medical aid.
Skin: Get medical aid. Flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes.
Ingestion: If victim is conscious and alert, give 2-4 cupfuls of milk or water. Never give anything by mouth to an unconscious person. Get medical aid.
Inhalation: Remove from exposure and move to fresh air immediately. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical aid.
Notes to Physician: Absorption of this product into the body may cause cyanosis (bluish discoloration of skin due to deficient oxygenation of the blood). Moderate degrees of cyanosis need to be treated only by supportive measures: bed rest and oxygen inhalation. For methemoglobinemia, administer oxygen alone or with Methylene Blue depending on the methemoglobin concentration in the blood. Cleansing of the entire contaminated area of the body is of utmost importance.

Section 5 - Fire Fighting Measures

General Information: As in any fire, wear a self-contained breathing apparatus in pressure-demand, MSHA/NIOSH (approved or equivalent), and full protective gear. Strong oxidizer. Contact with other material may cause fire. May explode under confinement and high temperatures, especially if contaminated.
Extinguishing Media: Use water spray to cool fire-exposed containers. Use flooding quantities of water as spray.
Flash Point: Not available.
Autoignition Temperature: Not applicable.
Explosion Limits, Lower: Not available.

Upper: Not available.
NFPA Rating: (estimated) Health: 2; Flammability: 0; Instability: 2; Special Hazard: OX

Section 6 - Accidental Release Measures

General Information: Use proper personal protective equipment as indicated in Section 8.
Spills/Leaks: Vacuum or sweep up material and place into a suitable disposal container. Clean up spills immediately, observing precautions in the Protective Equipment section. Avoid generating dusty conditions. Provide ventilation. Keep combustibles (wood, paper, oil, etc.,) away from spilled material.

Section 7 - Handling and Storage

Handling: Wash thoroughly after handling. Remove contaminated clothing and wash before reuse. Use with adequate ventilation. Minimize dust generation and accumulation. Avoid contact with eyes, skin, and clothing. Keep away from heat, sparks and flame. Keep from contact with clothing and other combustible materials. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose empty containers to heat, sparks or open flames. Avoid breathing dust. Inform laundry personnel of contaminant's hazards. Avoid localized heating of ammonium nitrate, potentially leading to development of high temperature areas. Ensure that ammonium nitrate is not exposed to strong shock waves from explosives. Avoid low pH (acidic) conditions.
Storage: Do not store near combustible materials. Store in a tightly closed container. Store in a cool, dry, well-ventilated area away from incompatible substances. Keep away from acids. Keep away from reducing agents. Avoid storage on wood floors.

Section 8 - Exposure Controls, Personal Protection

Engineering Controls: Facilities storing or utilizing this material should be equipped with an eyewash facility and a safety shower. Use adequate ventilation to keep airborne concentrations low.
Exposure Limits

Chemical Name	ACGIH	NIOSH	OSHA - Final PELs
Ammonium nitrate	none listed	none listed	none listed

OSHA Vacated PELs: Ammonium nitrate: No OSHA Vacated PELs are listed for this chemical.
Personal Protective Equipment

Eyes: Wear appropriate protective eyeglasses or chemical safety goggles as described by OSHA's eye and face protection regulations in 29 CFR 1910.133 or European Standard EN166.
Skin: Wear appropriate gloves to prevent skin exposure.
Clothing: Wear appropriate protective clothing to prevent skin exposure.
Respirators: Follow the OSHA respirator regulations found in 29 CFR 1910.134 or European Standard EN 149. Use a NIOSH/MSHA or European Standard EN 149 approved respirator if exposure limits are exceeded or if irritation or other symptoms are experienced.

Section 9 - Physical and Chemical Properties

Physical State: solid
Appearance: white to gray to brown
Odor: odorless
pH: 5.4 (0.1 M solution)
Vapor Pressure: Negligible.
Vapor Density: Not available.
Evaporation Rate: Negligible.
Viscosity: Not available.
Boiling Point: Not available.
Freezing/Melting Point:169 deg C
Decomposition Temperature:210 deg C
Solubility: Soluble.
Specific Gravity/Density:1.725 @ 25°C
Molecular Formula:NH4NO3
Molecular Weight:80.04

Section 10 - Stability and Reactivity

Chemical Stability: Stable at room temperature in closed containers under normal storage and handling conditions. Risk of explosion if heated under confinement. Deliquescent (tending to absorb atmospheric water vapor and become liquid).
Conditions to Avoid: Dust generation, contamination, heating in a confined space.
Incompatibilities with Other Materials: Strong reducing agents, strong acids, finely powdered metals, organic matter, chlorides, combustible materials.
Hazardous Decomposition Products: Oxides of nitrogen.
Hazardous Polymerization: Has not been reported.

Section 11 - Toxicological Information

RTECS#:

CAS# 6484-52-2: BR9050000
LD50/LC50:
CAS# 6484-52-2:
Oral, rat: LD50 = 2217 mg/kg;
.

Carcinogenicity:
CAS# 6484-52-2: Not listed by ACGIH, IARC, NTP, or CA Prop 65.

Epidemiology: No data available.
Teratogenicity: No data available.
Reproductive Effects: No data available.
Mutagenicity: No data available.
Neurotoxicity: No data available.
Other Studies:

Section 12 - Ecological Information

No information available.

Section 13 - Disposal Considerations

Chemical waste generators must determine whether a discarded chemical is classified as a hazardous waste. US EPA guidelines for the classification determination are listed in 40 CFR Parts 261.3. Additionally, waste generators must consult state and local hazardous waste regulations to ensure complete and accurate classification.
RCRA P-Series: None listed.
RCRA U-Series: None listed.

Section 14 - Transport Information

	US DOT	Canada TDG
Shipping Name:	AMMONIUM NITRATE	AMMONIUM NITRATE
Hazard Class:	5.1	5.1
UN Number:	UN1942	UN1942
Packing Group:	III	III

Section 15 - Regulatory Information

US FEDERAL

TSCA

CAS# 6484-52-2 is listed on the TSCA inventory.

Health & Safety Reporting List

None of the chemicals are on the Health & Safety Reporting List.

Chemical Test Rules

None of the chemicals in this product are under a Chemical Test Rule.

Section 12b

None of the chemicals are listed under TSCA Section 12b.

TSCA Significant New Use Rule

None of the chemicals in this material have a SNUR under TSCA.

CERCLA Hazardous Substances and corresponding RQs

None of the chemicals in this material have an RQ.

SARA Section 302 Extremely Hazardous Substances

None of the chemicals in this product have a TPQ.

SARA Codes

CAS # 6484-52-2: immediate, fire, reactive.

Section 313

This material contains Ammonium nitrate (listed as Water Dissociable Nitrate Compounds), > 98%, (CAS# 6484-52-2) which is subject to the reporting requirements of Section 313 of SARA Title III and 40 CFR Part 373.

Clean Air Act:

This material does not contain any hazardous air pollutants.

This material does not contain any Class 1 Ozone depletors.

This material does not contain any Class 2 Ozone depletors.

Clean Water Act:

None of the chemicals in this product are listed as Hazardous Substances under the CWA.

None of the chemicals in this product are listed as Priority Pollutants under the CWA.

None of the chemicals in this product are listed as Toxic Pollutants under the CWA.

OSHA:

None of the chemicals in this product are considered highly hazardous by OSHA.

STATE

CAS# 6484-52-2 can be found on the following state right to know lists: New Jersey, Pennsylvania, Massachusetts.

California Prop 65

California No Significant Risk Level: None of the chemicals in this product are listed.

European/International Regulations

European Labeling in Accordance with EC Directives

Hazard Symbols:

XI O

Risk Phrases:

R 36/37/38 Irritating to eyes, respiratory system and skin.

R 8 Contact with combustible material may cause fire.

R 9 Explosive when mixed with combustible material.

Safety Phrases:

S 17 Keep away from combustible material.
S 26 In case of contact with eyes, rinse immediately with plenty of water and seek medical advice.
S 37/39 Wear suitable gloves and eye/face protection.

WGK (Water Danger/Protection)
CAS# 6484-52-2: 1

Canada - DSL/NDSL
CAS# 6484-52-2 is listed on Canada's DSL List.

Canada - WHMIS
This product has a WHMIS classification of C, D2B.
This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations and the MSDS contains all of the information required by those regulations.

Canadian Ingredient Disclosure List
CAS# 6484-52-2 is not listed on the Canadian Ingredient Disclosure List.

Section 16 - Additional Information

MSDS Creation Date: 12/12/1997
Revision #7 Date: 2/11/2008

The information above is believed to be accurate and represents the best information currently available to us. However, we make no warranty of merchantability or any other warranty, express or implied, with respect to such information, and we assume no liability resulting from its use. Users should make their own investigations to determine the suitability of the information for their particular purposes. In no event shall Fisher be liable for any claims, losses, or damages of any third party or for lost profits or any special, indirect, incidental, consequential or exemplary damages, howsoever arising, even if Fisher has been advised of the possibility of such damages.

Wauseon Facility
715 West Linfoot Street PO Box 381
Wauseon, OH 43567
419-330-1932 | wauseon@cleanlites.com

Part B Permit Application Subsection G

HAZARDOUS WASTE CONTINGENCY PLAN & EMERGENCY RESPONSE PROCEDURES

USA LAMP & BALLAST RECYCLING, INC

dba CLEANLITES RECYCLING, INC
715 West Linfoot Street, PO Box 381
Wauseon, Ohio 43567
419.330.1932 phone | 517.676.4449 fax
wauseon@cleanlites.com

September 30, 2022

FOREWORD

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

FEDERAL

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

STATE

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

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

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

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

Thomas M Kimmel
President/CEO

Michael T Kimmel
Senior Vice President

TABLE OF CONTENTS

ATTACHMENTS

EXHIBITS

1.0 GENERAL INFORMATION (OAC 3745-54-52)

1.1 Facility Name and Location

This manual is applicable to USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc.

The specific location and mailing address of this facility are:

Specific Location	Mailing Address
715 West Linfoot St	PO Box 381
Wauseon, OH 43567	Wauseon, OH 43567

The general facility telephone, fax and email address are:

419.330.1932 phone, 517.676.4449 fax, wauseon@cleanlites.com email

The Facility is owned by:

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

The Facility is operated by:

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

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

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

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

The facility NAICS Code: 562920

1.2 Facility Operations

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

The inflators are taken to the room that houses the EADS. The inflators are placed on a conveyer for entry into the EADS. When the inflators process through the EADS at a temperature range of of 600 F to 1100 F and reach the correct temperature, it will initiate ~~a~~n autoignition and cause the inflators to deactivate.

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

A detailed facility drawings showing the building, storage areas and other pertinent areas are outlined in **Exhibit 1** of this subsection.

2.0 PURPOSE OF PLAN

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

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

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

The Contingency / Emergency Response Plan is intended as a guide of emergency procedures in the event of a fire, explosion, spill or release of universal/hazardous materials/wastes. This document is also intended as a reference source to familiarize local emergency response agencies, fire and police departments and area hospitals on operations relating to universal/hazardous materials/wastes and emergency response at the Cleanlites Recycling, Inc. facility.

The Contingency Plan shall be immediately amended for any of the following events.

Modification to the facility's Ohio hazardous waste permit
Facility modification
Emergency equipment modification
Emergency Coordinator change
As directed by the director

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

The automotive airbags being stored at Cleanlites Recycling, Inc are potentially hazardous due to the sensitivity to fire. **Attachment 1**of this subsection, provides a detailed list of all automotive airbags and components that maybe stored at the Cleanlites Recycling, Inc facility. In the event of a fire/explosion and/or spill, the Emergency Coordinator will identify the source 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, employee reports, manifests, and, if necessary, chemical analysis.

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 Subsection G **Attachment 2**, "Emergency Response Coordinators". The Wauseon Fire Department is the responding authority in the event of a fire at the facility. The Wauseon Fire Department has full authority as soon as they arrive at the site.

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

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

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

Subsection G **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

Subsection G **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 involving hazardous waste occurs, the Contingency Plan will be implemented, and the facility evacuated. The designated Emergency Coordinator has the authority to contact 911.

7.1 Criteria

The purpose of this subsection 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

In the event that a fire or explosion involving hazardous waste occurs, the Contingency Plan will be implemented, and the facility evacuated.

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

7.1.2 Spills or materials release

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

7.2 Authorization

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

8.0 EMERGENCY RESPONSE PROCEDURES

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

8.1 Notification

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

Any employee witnessing an imminent, developing or actual emergency situation shall immediately call 911 then notify the Emergency Coordinator or Alternates listed in **Attachment 2** of this Subsection. 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** of this Subsection. The Evacuation location is the front parking lot by West Linfoot Street.

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

- In the event evacuation is necessary, the Emergency Coordinator will immediately contact local authorities listed in **Attachment 3** in Subsection G 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** in Subsection G 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** in Subsection G, if necessary.

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

- Determine if a release of hazardous / dangerous material has occurred or is imminent.

- Identify the character exact source, amount, and extent of any released materials.

- Determine if other hazardous materials are endangered by the event and verify/institute operations for their protection and/or removal from the area.

- Verify that appropriate measures have or are being implemented to contain any spills and for the reduction of environmental impact.

- Assess possible hazards to human health or the environment that may result from the event and determine if the hazards will present a danger outside the facility. This assessment must include both direct and indirect effects of the event (e.g. the effects of any toxic, irritating, or asphyxiating gases that are generated or the effects of any hazardous surface water runoffs from water or chemical agents used to control fire.)

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

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

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

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

SDS 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 or her of the extent of the incident, actions being taken to combat and contain the event. Trained personnel assigned by the Emergency Coordinator will assist in the notification, control, and post-emergency actions if the Contingency Plan is implemented. All injured persons will be removed,

and medical treatment will be administered by trained personnel. The first responder shall take initial steps to prevent the event from spreading which might endanger chemicals or other hazardous materials in the area. If possible, these materials shall be moved to a safe area.

The Emergency Coordinator shall direct clean-up operations concerning:

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

8.3.1 FIRE / EXPLOSION
OAC 3745-65-52

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

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

In the event of a fire:

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

b. If Cleanlites Recycling, Inc personnel cannot safely and effectively perform corrective action in the event of a fire and/or explosion, the emergency coordinator must:

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

A. Person(s) injured and seriousness of injury

B. Location of any spill, leak, or fire material involved and source.

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

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

4. If the Emergency Coordinator determines that an area or site evacuation is required, personnel will be informed via the facility paging system and telephone. Designated employee runners will

   be sent as a backup to the areas to be evacuated and direct personnel away from the danger area. Evacuation route maps have been posted throughout the building. The evacuation assembly location is the front parking lot by West Linfoot Street at the Emergency Gathering Point Sign. Employees will be notified by supervisory personnel when the emergency is under control and it is safe to re-enter the facility. The evacuation plan is shown on **Exhibit 1** of this Subsection

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 Cleanlites Recycling, Inc personnel can handle the correction action and clean-up. A list of the emergency equipment is found under **Attachment 6** of this Subsection**.**

8. If Cleanlites Recycling, Inc 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 subsections 8.3.2.

   9. For fires that cannot be controlled using portable fire extinguishers the Emergency Coordinator must make the necessary reports as outlined in **Attachments 4 and 5** of this Subsection.

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 sound. Work in all areas will be shut down until the area is safely restored.

2. The Emergency Coordinator will be contacted.

3. The Emergency Coordinator must immediately identify the character, exact source, and extent of any released materials. The Emergency Coordinator will obtain the following information:

    - Person(s) injured and seriousness of injury.
    - Location of spill, leak, or fire and material involved and source
    - Typed of material that has spilled, is leaking, or burning.
    - The approximate amount of material spilled, an estimate of the liquid discharge rate and direction of liquid flow. An estimate of the size or the fire and location.

4. The Emergency Coordinator must evaluate the facility's emergency response equipment to determine if Cleanlites Recycling, Inc personnel can handle the corrective action and clean-up. A list of the emergency response equipment is found in under **Attachment 6** of this Subsection**.**

5. If Cleanlites Recycling, Inc 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 Cleanlites Recycling, Inc 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** of this S**ubsection**.

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** of this Subsection**.**

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

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

1. That a release, fire or explosion does not occur, reoccur or spread to other material at the facility.

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** of this Subsection). 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 reinstates, if contacted with 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 intact drums or cubic yard containers for containment.

If the area in which the container(s) were located requires decontamination, trained personnel will follow necessary procedures listed in Subsection 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** of this Subsection. **Exhibit 1**, of this Subsection, shows the location of the emergency equipment.

The Emergency equipment list and locations will be reviewed periodically and updated as necessary. If the Emergency equipment list and / or locations change the Contingency plan will be amended.

10.0 COORDINATION AGREEMENTS / COPIES OF CONTINGENCY PLAN
OAC 3745-54-52 (C), 3745-54-37 / OAC 3745-54-53

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

The Wauseon Fire Department is the responding authority in the event of an emergency at the Cleanlites Recycling, Inc 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.

Cleanlites Recycling, Inc will document any refusals to enter into a coordination agreement.

Cleanlites Recycling, Inc 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**, of this Subsection, provides a list of contacts for the contingency plan distribution. **Attachment 8**, of this Subsection, provides a sample distribution letter that accompanies the Contingency Plan distribution.

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

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

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

12.0 REQUIRED REPORTS

The time, date, and details of any incident that requires implementing the contingency plant 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,** of this Subsection, show the required reporting forms.

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

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

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

14.0 PROCEDURES TO PREVENT HAZARDS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

If inspections reveal that non-emergency maintenance is needed, they will be completed as soon as possible to preclude further damage and reduce the need for emergency repairs. Any

spilled or leaked materials are immediately cleaned up. Any sorbents or residues from the spill cleanup are disposed of properly. Waste in containers found to be broken or leaking will be removed from the container and placed in 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. Cleanlites Recycling, Inc 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 on-site. As required, records of inspection are kept for 3 years from the date of inspection.

16.0 LOADING/UNLOADING OPERATION

Loading and unloading operations at the facility include:

UNLOADING

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

LOADING

- All materials are staged in storage area 5 according to the materials that are being prepped for shipping out to the downstream vendor for recycling.

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

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

List of Hazardous Materials

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

Ohio Environmental Protection Agency

Please Note: Pages of this application which contain facility staff personal/home phone numbers have been removed from this web-available version of the document

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

Thank you.

EMERGENCY TELEPHONE LIST

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

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 form 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

EMERGENCY REPORT

Emergency Report Incident No._____

1. Type of emergency: Fire_____, Spill_____, Other_____
2. Time of emergency: Date_____, Time_____
3. Location of Emergency: _____
4. Description of Emergency and property involved_____

_____

_____

5. Materials involved and their hazards_____
6. Cause of Emergency_____

_____

7. If fire, source of ignition_____
8. Narrative account of fire/spill control measures_____

_____

_____

9. Extinguishing agents used (itemize)_____

_____

10. List other equipment used_____
11. All clear announced by_____
12. Emergency equipment restored to operating condition_____
13. Recommendations and remarks_____

_____

14. Report Submitted By_____, Title_____

EMERGENCY EQUIPMENT

PERSONNEL PROTECTIVE EQUIPMENT	CAPABILITIES OF EQUIPMENT	LOCATION
Personal Protective Suits	Splash Protection	Tornado shelter near EADS
Safety Gloves	Hand Protection	Tornado shelter near EADS
Safety Glasses	Eye Protection	Tornado shelter near EADS Wall before entering deconstruction area See on Exhibit 1 – D
Goggles	Eye Protection	Tornado shelter near EADS
Ear Protection	Hearing Protection	Tornado shelter near EADS Near clock-in station See on Exhibit 1- D
Fixed Eyewash Station	Eye Protection	See on Exhibit 1 - D
Industrial First Aid Kit and supplies	Minor First Aid	Training room/ tornado shelter Near clock-in station See Exhibit 1 – D
FIRE RESPONSE EQUIPMENT		
Portable Fire Extinguishers Small hand-held extinguishers are located throughout the building. (See Exhibit 1D). The extinguishers are inspected and refilled (if necessary) yearly.	Water Mist, Class A&C Clean Agent, Class A, B & C C02, Class B & C Dry Chemical, Class A, B & C	Throughout facility See on Exhibit 1 - D
SPILL RESPONSE / DECONTAMINATION EQUIPMENT		
Personal Protective Suits	Splash Protection	Spill kit in shipping and receiving
Protective Gloves	Hand Protection	Spill kit in shipping and receiving Tornado shelter near EADS
Protective Goggles	Eye Protection	Spill kit in shipping and receiving Tornado shelter near EADS
Soda Ash	Neutralization and Absorption	
Sorbents	Absorption	Spill kit in shipping and receiving
Repair Putty		Spill kit in shipping and receiving
Hazardous Waste Disposal Bags		Spill kit in shipping and receiving
Shop Vacuum		Maintenance room
Empty 55-gallon open head drums		Throughout facility
85-gallon disposable (over pack) drums		Spill kit in deconstruction area
Containment pallets		Shipping and receiving
Shovels, brooms, buckets, mops		Throughout facility
COMMUNICATION EQUIPMENT		
Telephone system in the office of the facility connected to outside lines	Communicate within and outside facility	Office
Telephone located in training room / tornado shelter	Communicate within and outside facility	Training room/ Tornado shelter
Walkie Talkies used inside the facility to communicate in the offices and facility.	Communicate within facility	Walkie talkies at each point of work on floor
Continuous video monitor located in the office with a camera in the EADS room, shipping and receiving and overlooking the storage areas.	Monitor processing, storage and dock areas	

CONTINGENCY PLAN DISTRIBUTION LIST

PERSONNEL	TITLE
Thomas M Kimmel	President and CEO
Michael Kimmel	Sr. Vice President General Manager - Operations Safety & Compliance Officer
Daniel Kimmel	Facility Manager
Sam Richman	Operations Manager
	Shipping and Receiving Supervisor
	Supervisor
	Supervisor
	Technician
	Technician
	Technician
	Driver / Technician
	Driver / Technician
	Office Assistant
	Office Assistant

EMERGENCY	TITLE
Hospital	Fulton County Health Center
Fire / Environmental & Safety Services	Wauseon Fire Department
Police Dept	Wauseon Police Department
OH EPA Emergency Response	

CONTINGENCY PLAN DISTRIBUTION LETTER

Wauseon Facility
715 West Linfoot Street PO Box 381
Wauseon, OH 43567
419-330-1932 | wauseon@cleanlites.com

Chief Rick Sluder
Wauseon Fire Department
230 Clinton St, #206
Wauseon, Ohio 43567

Dear Chief Sluder:

Cleanlites Recycling, Inc is a local Universal Waste facility that receives airbag modules for recycling. After processing the airbags, the materials are sent to the final destination facilities for the reclaiming of metals and plastics. As part of these operations, Cleanlites Recycling generates and manages universal/hazardous waste. Cleanlites Recycling, Inc requests your agreement to respond to emergencies at our facility, as appropriate for your function, upon request by Cleanlites Recycling Facility personnel.

Enclosed for your information is a copy of the Cleanlites 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 letter in writing. A self-addressed return envelope is enclosed for your use.

If you should have any questions, please contact me at (419) 330-1932.

Respectfully submitted,

Daniel Kimmel
Primary Emergency Response Coordinator
Cleanlites Recycling, Inc

Cleanlites Recycling, Inc Contingency Plan Receipt Acknowledgement

Print / Type Name and Title

Signature Date

Mason, MI • Lakeville, MN • Cincinnati, OH
• Wauseon, OH • Spartanburg, SC
(419) 330-1932 | wauseon@cleanlites.com
www.cleanlites.com

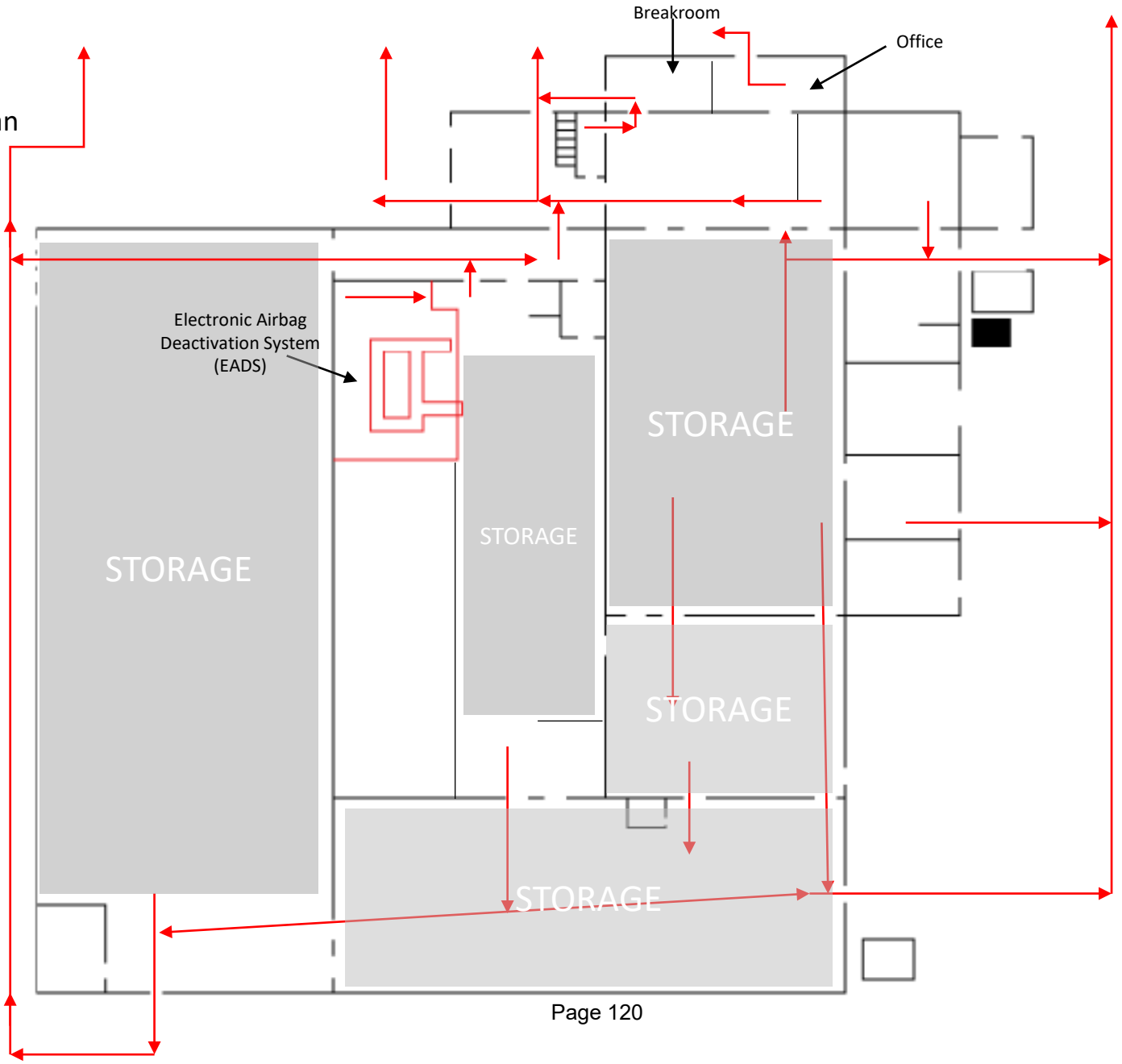
N

Subsection G - Exhibit 1A
Hazardous Waste Contingency Plan
& Emergency Response Plan

FACILITY MAP- Emergency Exits

USA Lamp & Ballast Recycling, Inc.
dba Cleanites Recycling, Inc
OHR 000 108 050
715 W. Linfoot Street
Wauseon, OH 43567

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

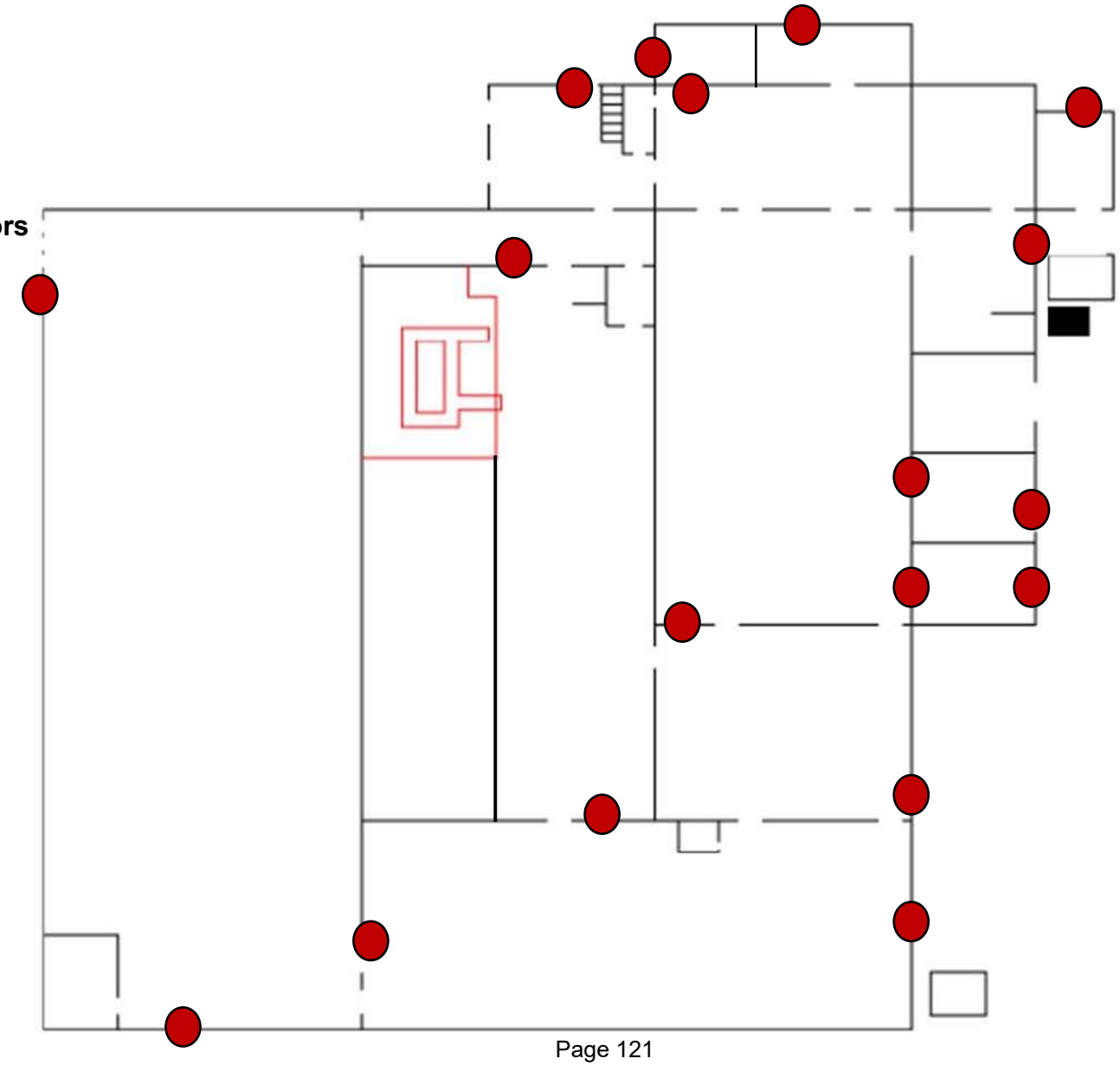


Mason, MI • Lakeville, MN • Cincinnati, OH
• Wauseon, OH • Spartanburg, SC
(419) 330-1932 | wauseon@cleanlites.com
www.cleanlites.com

N

Subsection G - Exhibit 1B
Hazardous Waste Contingency Plan
& Emergency Response Plan

FACILITY MAP- Emergency Exits Doors



USA Lamp & Ballast Recycling, Inc.
dba Cleanlites Recycling, Inc
OHR 000 108 050
715 W. Linfoot Street
Wauseon, OH 43567

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

Mason, MI • Lakeville, MN • Cincinnati, OH
• Wauseon, OH • Spartanburg, SC
(419) 330-1932 wauseon@cleanlites.com
www.cleanlites.com

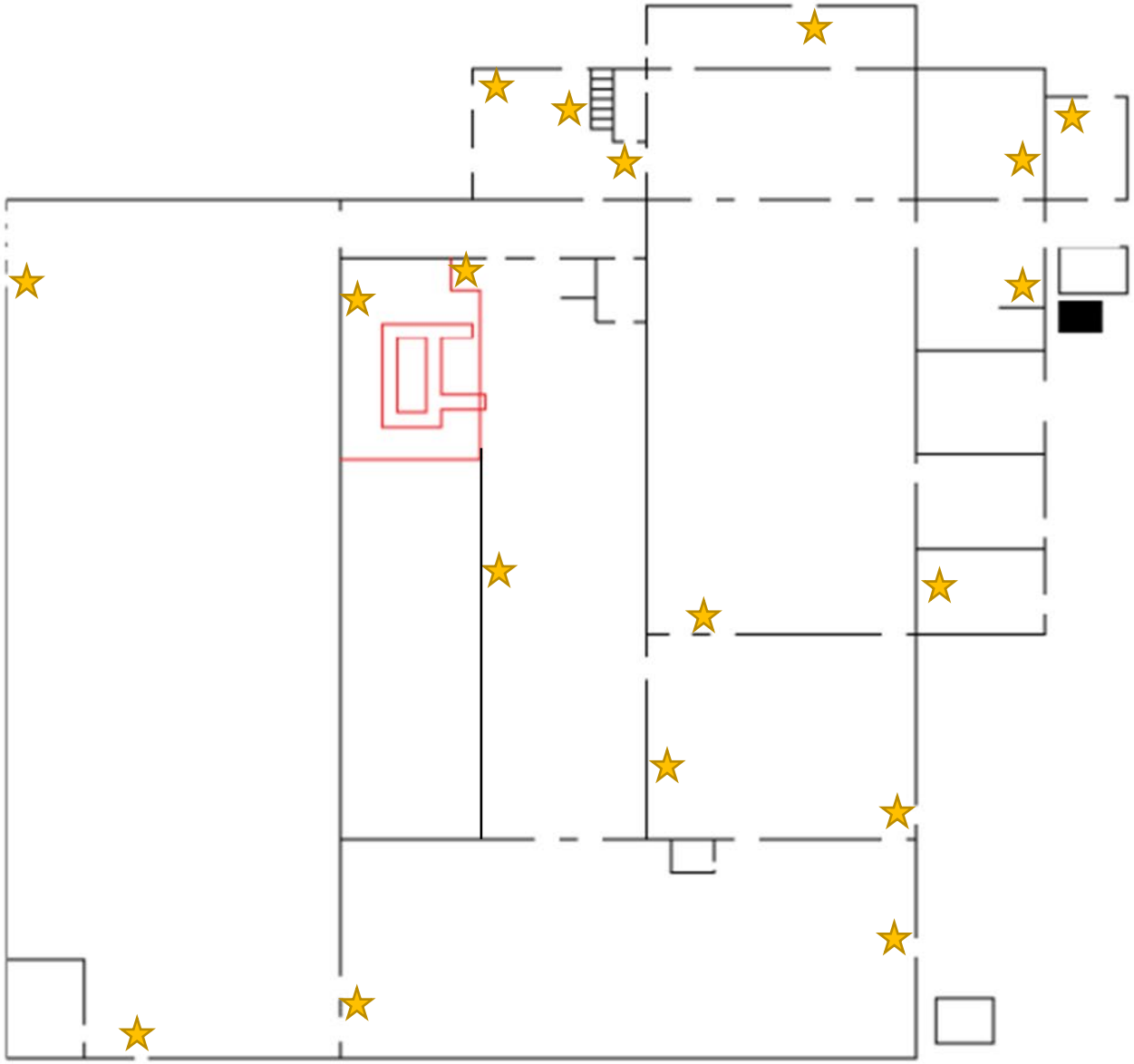
N

Subsection G - Exhibit 1C
Hazardous Waste Contingency Plan
& Emergency Response Plan

FACILITY MAP - Emergency Lights

USA Lamp & Ballast Recycling, Inc.
dba Cleanlites Recycling, Inc.
OHR 000 108 050
715 W. Linfoot Street
Wauseon, OH 43567

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



Mason, MI • Lakeville, MN • Cincinnati, OH
• Wauseon, OH • Spartanburg, SC
(419) 330-1932 wauseon@cleanlites.com
www.cleanlites.com

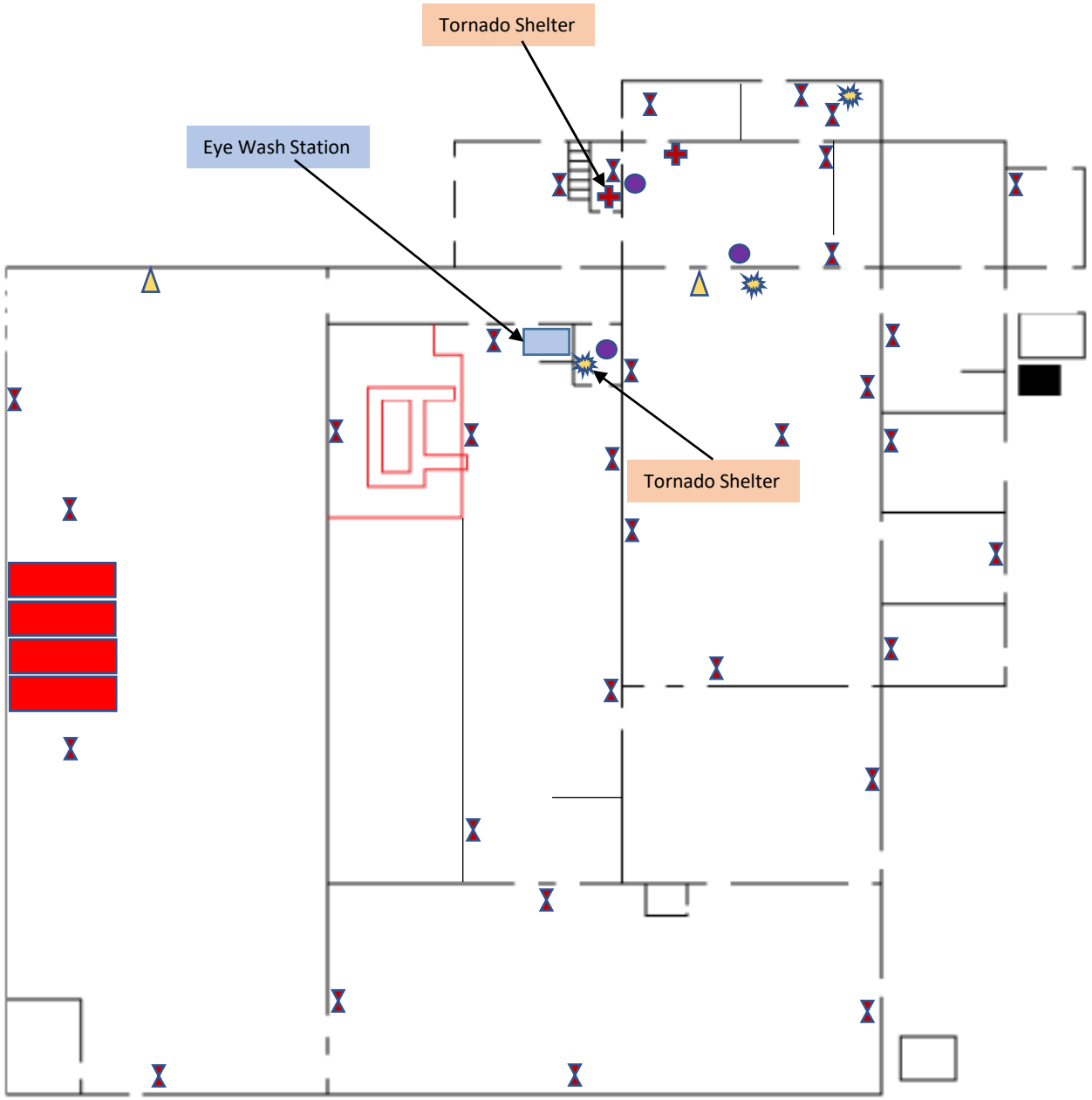
N

Subsection G - Exhibit 1D
Hazardous Waste Contingency Plan
& Emergency Response Plan

FACILITY MAP
Emergency Equipment

USA Lamp & Ballast Recycling, Inc.
dba Cleanites Recycling, Inc
OHR 000 108 050
715 W. Linfoot Street
Wauseon, OH 43567

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



Emergency Equipment
- First Aid
- PPE
- Spill Kit
- Fire Extinguisher
- Communication Equipment
- Eyewash Station

Mason, MI • Lakeville, MN • Cincinnati, OH
• Wauseon, OH • Spartanburg, SC
(419) 330-1932 | wauseon@cleanlites.com
www.cleanlites.com

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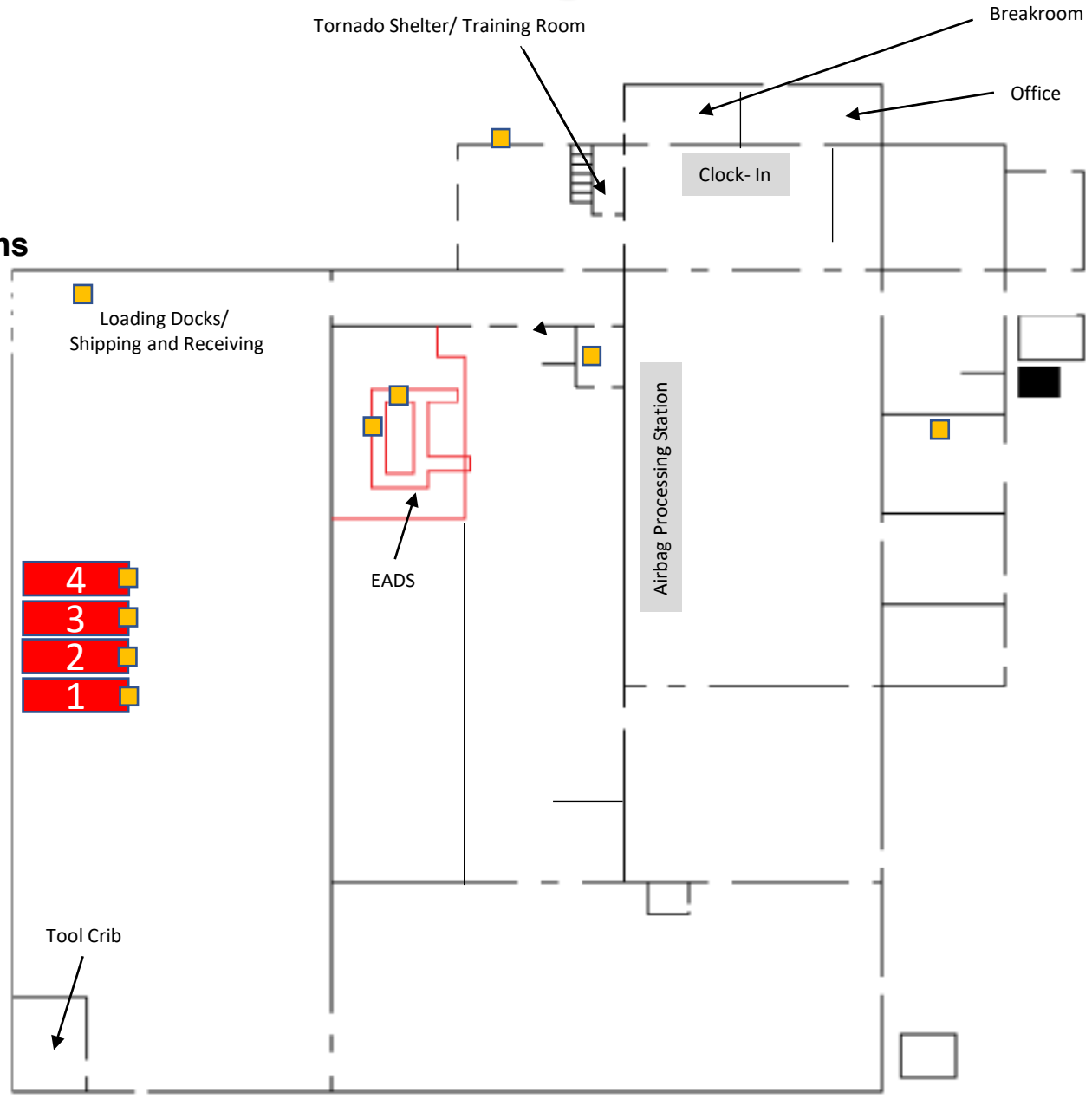
Subsection G - Exhibit 1E
Hazardous Waste Contingency Plan
& Emergency Response Plan

FACILITY MAP - Warning Signs

USA Lamp & Ballast Recycling, Inc.
dba Cleanlites Recycling, Inc
OHR 000 108 050
715 W. Linfoot Street
Wauseon, OH 43567

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



Hazardous Airbag
ATF Storage

Warning Signs

Date:								
Inspector's initials								
Pass/ Fail	Yes	No	Yes	No	Yes	No	Yes	No

PERIMETER & SECURITY

Opener's Inspections: • Fences • Doors • Gates • Windows								
Transportation Yard and Parking lot Free of: • Focus material or items containing focus material • Oil • Debris • Illegal dumping or abandoned material								
Drum and Material Inspection: • Drums are sealed • No leaks or visible damage • All drums have proper labels • Drum pallets are not damaged								

FLOOR INSPECTION

General Housekeeping: • Tools kept at workstation • Floors and pathways free of slip/ trip hazards • Materials organized • No excess piles of materials								
General Storage: • Gaylords double stacked correctly • Containers have proper labels								
Fire Safety: • Fire extinguisher, emergency exits, pathways, electrical panels, and fire risers all clear of obstructions								

Date:								
	Yes	No	Yes	No	Yes	No	Yes	No
Equipment Inspections Complete: • Forklift(s) 1, and 2 • Scissor Lift • Pallet Jacks • Sigle Drum Dolly								
Inspections Complete: • Baler(s) 1, 2, and 3 • Scale Calibration • Airbag Deactivation System (EADS)								
Checked for spills and releases: • Shipping and receiving • Travel pathways • Storage/ work areas								
Checked for Safety and Environmental Hazards: • New/ worsening structural damage • Any potential unsafe work conditions								

QUALITY

All work instructions at point of use: • Deconstruction area • Baler operations • Shipping and receiving • Sorting area								
All warning signs maintained: • No smoking • Flammable liquid • Confined space • Compressed gas								
Warning signs on: • EADS • Magazines • Loading Docks • Propane Cage • Flammable Liquid Cabinets								

MAGAZINE INSPECTION

Date:								
	Yes	No	Yes	No	Yes	No	Yes	No
• Doors closed and secure with lock • All drums upright • Proper labels • All drums secure and dogged down • All signage in place								

EYEWASH STATION

• Water runs clear • Jets are working properly • Surroundings are clear of obstructions • No leaks								

**** All No areas shall be explained below:***

Date: _____ Issue: _____
Correction: _____
Date: _____ Issue: _____
Correction: _____
Date: _____ Issue: _____
Correction: _____
Date: _____ Issue: _____
Correction: _____
Date: _____ Issue: _____
Correction: _____
Date: _____ Issue: _____
Correction: _____
Date: _____ Issue: _____
Correction: _____

Record of Revisions

Revision Date	Description	Sections Affected
03/24/17	Initial Release of Document	All
03/06/18	Changed from F-10A to F29A	All
04/18/18	Added weekly inspections section, removed Visual Inspection row.	Floor Inspection
04/18/22	Changed from daily to weekly, added warning sign inspection to quality, added pallet jack and single drum dolly to inspections, added pallet check to drum inspection. Added eyewash station.	All

Record of Approval

Task	Name/Signature	Job Title	Date
Written By:	Ashley Jarboe	EHS Coordinator	4/18/18
Written By:	Benny Coyt	EHS Manager	03/24/17
Approved By:	Tim Kimmel	VP Sales & Marketing	3/24/17
Written and approved by:	Benny Coyt	EHS Manager	3/6/18
Written and approved by:	Sam Richman	Operations/ Compliance	04/18/22

MONTHLY INSPECTION CHECKLIST WAUSEON

AREAS OF INSPECTION		Fire Extinguishers	EADS	Dust Collector	Air Compressor Tools
Put initials of inspector and exact date inspected below month		• Inspection tag • Does not need charged/ is not over charged	• Oil Reservoir • Trunnions • Brass Lubrication • Graphite	• Filters • Oil Reservoir • Motor	• Oil Reservoir
January	Pass				
	Fail				
February	Pass				
	Fail				
March	Pass				
	Fail				
April	Pass				
	Fail				
May	Pass				
	Fail				
June	Pass				
	Fail				
July	Pass				
	Fail				
August	Pass				
	Fail				
September	Pass				
	Fail				
October	Pass				
	Fail				
November	Pass				
	Fail				
December	Pass				
	Fail				

**** All FAILED areas shall be explained below:***

Date: _____ Issue: _____
Correction: _____

Date: _____ Issue: _____
Correction: _____

Date: _____ Issue: _____
Correction: _____

Date: _____ Issue: _____
Correction: _____

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Date: _____ Issue: _____
Correction: _____

Date: _____ Issue: _____
Correction: _____

Date: _____ Issue: _____
Correction: _____

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 to this subsection, shows a summary of employee training and frequency while Attachment B to this subsection, shows the checklist that is maintained in the employee files.

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

The Senior Vice President | Safety & 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

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 as outlined in Subsection H Attachment A 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 Recycling, Inc 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 of this subsection. The names of employees filling these positions are maintained at the facility.

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 of this subsection. 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.

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
CPR / FIRST AID	Orientation / Annually
FORKLIFT	Orientation / 3 years
GENERAL SAFETY GUIDELINES	Orientation / On-going / Annually
PROPER HANDLING OF AIRBAGS	Orientation / Annually
EADS SHUTDOWN PROCEDURES	Orientation / Annually
LOCK OUT TAG OUT PROCEDURES	Orientation / Annually
LOADING DOCK SAFETY	Orientation / Annually
BLOODBORNE PATHOGENS	Orientation / Annually

EMPLOYEE TRAINING LOG

EMPLOYEE NAME: _____ **START DATE** _____

TRAINING DESCRIPTION	DATE	DATE	DATE	DATE	DATE	EMPLOYEE INITIALS	SUPERVISOR INITIALS
Materials Handling & Storage							
Spill Prevention & Response							
PPE							
LOTO							
Forklift / Loading Dock Safety							
DOT HAZMAT							
DOT HAZMAT 8hr Refresher							
HAZCOM							
Contingency Plan							
Security Awareness							
EADS Shutdown / LOTO procedures							
Bloodborne Pathogens							
CPR / First Aid							
Airbag and Seatbelt Pretensioners							
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							

EMPLOYEE TRAINING LOG

EMPLOYEE NAME: _____ **START DATE** _____

TRAINING DESCRIPTION	DATE	DATE	DATE	DATE	DATE	EMPLOYEE INITIALS	SUPERVISOR INITIALS
HAZWOPER 40-HOUR							
Understanding Hazwoper							
Heat Stress							
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							

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							

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

EMPLOYEE JOB DESCRIPTIONS

Position Title: Senior Vice President | Safety & Compliance Officer

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.

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

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

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

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

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.

Wauseon Facility
715 West Linfoot Street PO Box 381
Wauseon, OH 43567
419-330-1932 | wauseon@cleanlites.com

Part B Permit Application Subsection I

FACILITY CLOSURE PLAN

USA Lamp & Ballast Recycling, Inc

dba Cleanlites Recycling, Inc

715 West Linfoot Street

Wauseon, Ohio 43567

(419) 330-1932 | wauseon@cleanlites.com

9/30/2022

Background, Facility, and unit descriptions:

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

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

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

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

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

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

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

Owner/ Operator names(s):

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

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

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

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

Latitude: 41° 33' 30.636" N

Longitude: 84° 9' 19.62" W

Telephone Number: (419)330-1932

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

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

EPA Identification Number: OHR 000 108 050

NAICS Code: 562920 Materials Recovery Facility

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

As stated above, these automotive airbags will be processed in an Electronic Airbag Deactivation System that includes a water quench for cooling the inflators after the deactivation process. The inflators will be loaded onto a conveyor belt inside an isolated room. The Electronic Airbag Deactivation System will slowly heat the inflators up to a temperature of between 600 – 1100 F. The temperature will cause a chain reaction and cause the inflators to deactivate. This method is completed in a controlled environment away from personnel, creating the safest possible method to manage these units. The Electronic Airbag Deactivation System is designed to ensure that no automotive airbag can exit the processing procedure without being deactivated.

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

Cleanlites Recycling Inc. Commitment:

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

- Minimizes the need for further maintenance; and
- Controls, minimizes, or eliminates the threats to human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters, or to the atmosphere.

Plan Description:

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

Hazardous Waste Inventory:

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

Normal Processing Inventory:

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

Storage Quantities:

Maximum on-site storage of hazardous waste in 7 storage areas (4,751 cubic yards)

Other waste and recyclable materials

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

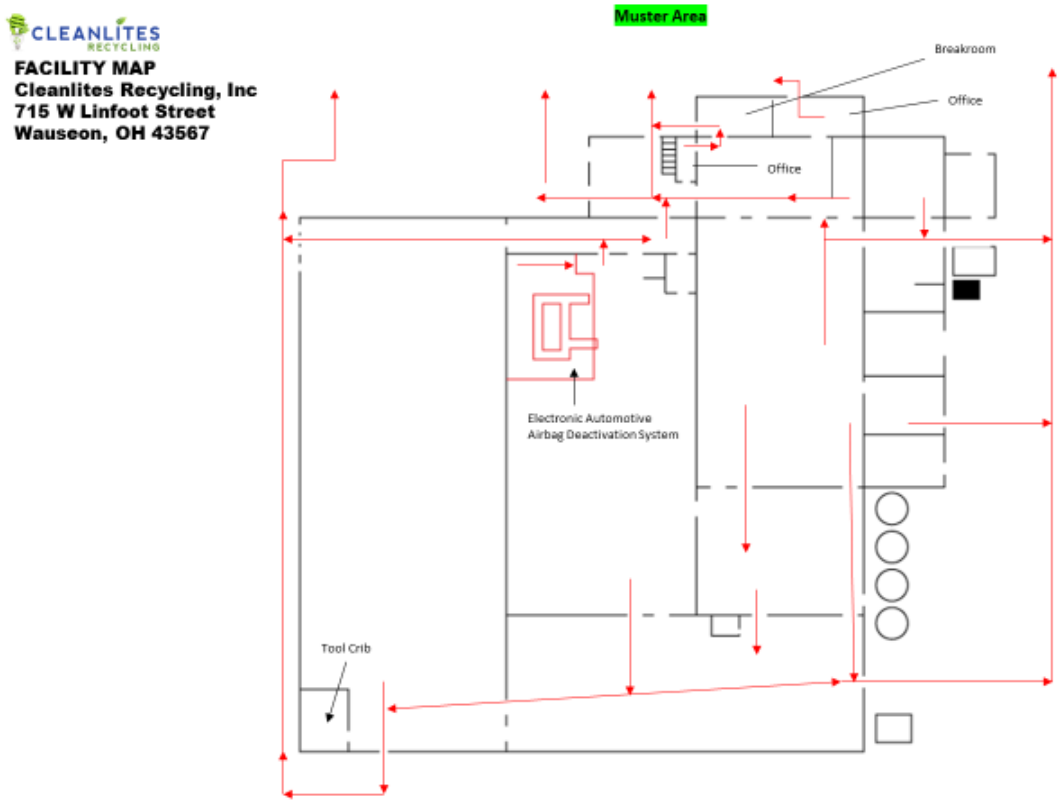
These by-products will all be collected and sent off site for recycling.

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

Cleanlites Recycling, Inc Maps:

Aerial map:

Cleanlites Recycling Inc – Layout



Wastewater Plan

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

The Electronic Airbag Deactivation System unit for the Automotive Airbags.

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

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

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

Inspections:

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

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

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

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

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

Record keeping:

Cleanlites Recycling, Inc will maintain records of the following;

- Closure notice to Ohio EPA
- Documentation describing the closure activities.
- Inspections of each area.

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

Schedule:

No.	Action description	Month 1	Month 2	Month 3	Month 4
1	Process all remaining automotive airbags at the facility and ship the recycled metal off-site	X			
2	Notify Ohio EPA of the intent to close the Electronic Airbag Deactivation System process for automotive air bags	X			
3	Profile & evaluate all wastewater involved in the Electronic Airbag Deactivation System	X			
4	Ship all wastewater from cleaning off-site to the proper disposal facility		X		
5	Clean the Electronic Airbag Deactivation System, ancillary equipment, and surrounding area thoroughly		X		
6	Evaluate, profile, and dispose of any waste from the cleaning of the Electronic Airbag Deactivation System and ancillary equipment.			X	
7	Collect all cardboard, plastic, and metals and ship to downstream vendor for processing.			X	
8	Inspect and photograph all areas where automotive air bags were stored and processed			X	
9	Prepare a final summary report and submit to Ohio EPA				X

Appendix 1

Emergency Response Coordinators

(Pollution Prevention Team)

Table 1: Emergency contact List

Call Order	Title	Coordinator ID	Name	Telephone
1	Facility Manager	Primary Emergency Response Coordinator	**Daniel Kimmel**	Office: 419.330.1932 Cell: 517.214.0453
2	Operations/ Compliance	Secondary Emergency Response Coordinator	**Sam Richman**	Office: 419.330.1932 Cell: 419.439.3762
N/A	Contracted Spill Responder			24-Hour

Subsection I
Attachment A

Cost Estimate for Post-Closure Care

USA LAMP & BALLAST RECYCLING, INC

dba CLEANLITES RECYCLING, INC
715 West Linfoot Street
PO Box 381
Wauseon, Ohio 43567
419.330.1932 phone | 517.676.4449 fax
wauseon@cleanlites.com

9/30/2022

Facility Information Summary

I. GENERAL INFORMATION:

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

Owner/Operators name:

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

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

Cleanlites Recycling Inc. is a privately-held corporation

II. FACILITY INFORMATION:

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

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

III. REASON FOR POST-CLOSURE COST ESTIMATE:

X New Facility — Ohio EPA ID # OHR 000 108 050

☐ Existing Facility

☐ Annual Update

☐ Modification

☐ Alteration

☐ Other

IV. Basis for Estimate

What is the basis for the cost estimate:

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

Identify the third-party providing the post closure estimates:

Resource-One
6043 Interstate Circle
Cincinnati, OH 45242
513-247-0175

I		Waste Disposal Cost			
		Item Description	Quantity	Unit Cost	Total Item Cost
a.		Disposal of maximum on-site Automotive Airbags (modules) (D001, D003). Resource-One 2000 Mote Drive Covington, OH 45318	160,000 lbs.	$1.75/lb.	$280,000.00
b.		Disposal of maximum on site Automotive Airbag Inflators- ATF regulated. (D001, D003). Resource-One 2000 Mote Drive Covington, OH 45318	120,000 lbs.	$1.75/lb.	$210,000.00
c.		Cost to transport Automotive Air Bags (D001, D003) to Resource-One in Covington, OH. 8 trips	8 trips	$500.00/trip	$4,000.00
d.		Landfill cost for disposal of general waste.	1- 40yard container	$500.00/ container	$500.00
e.		Transportation of the general waste to landfill	1-40yard container	$300.00/ container	$300.00
f.		Transportation of discharged inflators to downstream recycler	1-40yard container	$200.00 /container	$200.00
		Total- Waste Disposal Cost			**$495,000.00**

II	**Consultant/Engineering Services**			
	Item Description	Quantity	Unit Cost	Total Item Cost
a	Develop profile for automotive air bag disposal with Resource-One, Cincinnati, OH	2 hrs.	$135.00/hr.	$270.00
b	Contract labor to cleanup waste and load air bags onto transport vehicles	40 hrs.	$50.00/hr.	$2,000.00
c	Evaluate lab data and complete waste profile for wastewater disposal	2 hrs.	$100.00/hr.	$200.00
d	Coordinate disposal of automotive air bags, wastewater, general trash and discharged metals. This includes filling out shipping papers and making & labeling to Ohio EPA.	40 hrs.	$100.00/hr.	$4,000.00
e	Consultant/Engineering overall management costs to manage project, including inspections and reporting to Ohio EPA	40 hrs.	$100.00/hr.	$4,000.00
Total – Consultant/Engineering Services				**$10,470.00**

SUMMARY OF COSTS:		
Item	**Description**	**Cost**
I	Total- Waste Disposal Costs	$495,000.00
II	Total- Consultant/Engineering Services	$ 10,470.00
	Grand Total	**$505,470.00**

Ohio Environmental Protection Agency

Please Note: 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.

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

Thank you.

SUBSECTION J

CORRECTIVE ACTIONS
OAC 3745-50-44 (D)

This subsection 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 Marano Holdings, LP and used to manufacture noodles. 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)

Cleanlites 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 Subsection of the Part A Permit Application.

J-1b Designation of Type of Unit

Cleanlites Recycling, Inc operates an Electronic Automotive Airbag Deactivation System at the Wauseon facility. Cleanlites Recycling is a destination facility for recalled and/or defective automobile airbags and seatbelt pretensioners. The recalled and/or defective automobile airbags and seatbelt pretensioners are accepted for storage prior to being deactivated at the facility. All by-products/residuals remaining following the deactivation process are non-hazardous. All by-products/residuals, with the exception of the baghouse dust, will be recycled. The baghouse dust will be sent to the landfill.

J-1c General Dimensions and Structural Description

Cleanlites Recycling, Inc is located in an 78,112 square foot building on approximately 17.58 acre of land. The facility consists of a single, concrete block building. The Maps subsection of the Part A permit application contains drawings and maps of the building and area.

J-1d When the Unit Operated

Cleanlites Recycling, Inc commenced operations, under the terms of Ohio EPA DFFO dated September 25, 2019 (Attachment A), at 715 West Linfoot Street, Wauseon, OH on September 26, 2019.

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

Cleanlites Recycling, Inc is a destination facility for recalled and/or defective automobile airbags and seatbelt pretensioners. The recalled and/or defective automobile airbags and seatbelt pretensioners are accepted for storage prior to being disassembled and deactivated at the facility. All by-products/residuals are recycled with the exception of the baghouse dust which is sent to the local landfill.

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 Cleanlites Recycling, Inc.

J-3: SAMPLING AND ANAYLSIS

There is no evidence of known or potential releases of hazardous waste or hazardous waste constituents at the Cleanlites Recycling, Inc site. There are no ground water wells or springs in the area or surface water located on the property. Storage and processing occur 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 Marano Holdings, LP and used to manufacture noodles. 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 Cleanlites Recycling, Inc.

Ohio Environmental Protection Agency

Mike Dewine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

September 25, 2019

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

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

Subject: Final Findings and Orders of the Director

Dear Sir:

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

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

Sincerely,

Tonya Andrews

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

Enclosure

cc: Kristie Shipley, DERR, CO
Mitch Mathews, DERR, CO
Tammy Heffelfinger, DERR, CO
Brad Mitchell, DERR, CO
Colleen Weaver, DERR, NWDO
Sarah Miles, Legal

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

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

Director's Final Findings and Orders

Respondent

PREAMBLE

It is agreed by the parties hereto as follows:

I. JURISDICTION

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

II. PARTIES BOUND

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

III. DEFINITIONS

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

IV. FINDINGS

The Director of Ohio EPA has determined the following findings:

1. Pursuant to ORC § 3734.02(G) and OAC rule 3745-50-31, the Director, by order, may exempt any person generating, storing, treating, disposing of, or

transporting hazardous waste, in such quantities or under such circumstances that, in the determination of the Director, are unlikely to adversely affect the public health or safety or the environment from any requirement to obtain a permit or comply with other requirements of ORC Chapter 3734. Such an exemption shall be consistent with and equivalent to rules promulgated under the Resource Conservation and Recovery Act of 1976, 90 Stat. 2806, 42 U.S.C. § 6921 et seq., as amended.

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

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

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

   The Memorandum can be read to mean any used, discarded and un-deployed airbags are solid waste and hazardous waste (airbags that use compressed gas would need to be properly evaluated in accordance with

OAC rule 3745-52-11). Un-deployed airbags that were never installed in a vehicle, such as those sold at retail, are not "used" and, thus, not subject to the Memorandum.

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

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

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

4. In light of Finding No. 3. of these Orders, Respondent and Ohio EPA have had discussions about Respondent's desire to store and recycle discarded, un-deployed airbags at Respondent's Facility without the need of a hazardous waste permit for storage prior to recycling as well as treatment of the airbags during the recycling process while Respondent pursues an Ohio hazardous waste permit. During these discussions, Respondent explained Respondent would receive assembled airbag modules and would disassemble onsite to remove the inflator devices. The inflator devices are regulated by Bureau of Alcohol, Tobacco and Firearms (BATF), which Respondent has been issued an BATF permit (permit number 4-OH-051-34-2F-01199) for the storage and management of inflators. The storage of inflators will meet the following standards, pursuant to the BATF permit: in a fire-resistant, weather-resistant, and theft-resistant magazine, exposed metal components are painted to avoid sparking; use of non-sparking materials and tools; employee training and background checks. The assembled airbag modules are not regulated by BATF. At the effective date of these Orders, Respondent will store no more than 1,000,000 pounds of assembled airbag modules for the first 180 days after the effective date of these Orders which will be stored inside the building. 180 days after the effective date of these Orders, Respondent will only store up to 160,000 pounds of assembled airbags inside the building and up to 120,000 pounds of air bag inflators inside four (4) magazines within the building. Respondent explained that the recycling process would entail removing the inflator from the assembled airbag module and placing the inflator devices on a conveyor that feeds into an Electronic Airbag Deactivation System (EAD) which is heated to 600 degrees Celsius. The temperature causes a chain reaction

that will deactivate the ammonium nitrate which renders the units non-hazardous (the ignitability and reactivity hazardous waste characteristics are deactivated). The recovered metal from the EAD would be cooled in a quench bath then packaged for off-site shipment to a metal reclamation facility. The plastic and other material from the airbag modules (e.g., nylon bag) would also be sent off-site for recycling. The EAD is located inside an isolated room away from all employees. Respondent will train all employees who handle inflators and airbag modules on safe handling of these devices and will continue to update and provide training on proper safety procedures. Furthermore, Respondent intends to conduct daily operation inspections and monthly maintenance and operation inspections of the system to ensure the system is working properly and all safety measures are in place. Respondent explained that by following these procedures all airbag modules and inflators can be effectively and safely recycled.

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

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

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

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

V. ORDERS

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

2. Respondent may not exceed the following storage capacity at the Facility, except for assembled airbag modules as described in Order No. 3.:

   a. Maximum of 160,000 pounds of assembled airbag modules in the building; and
   b. Maximum of 120,000 pounds of inflators (BATF regulated) in BATF magazines.

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

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

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

6. Respondent shall submit a disclosure statement to the Ohio Attorney General as pursuant to ORC § 3734.42 and OAC chapter 109:6 at the same time Respondent submits Respondent's Part A permit application described in Order No. 4.

7. Within 30 days of the effective date of these Orders, Respondent shall provide documentation demonstrating Respondent has established financial assurance and liability coverages for the areas of the Facility subject to closure, in accordance with OAC rules 3745-55-42 through 3745-55-47.

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

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

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

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

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

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

13. If any of Orders 12.c., or 12.d. or 12.e. occurs, Respondent shall within 14 days of the occurrence, cause the lawful off-site transportation of all un-deployed airbags to an authorized facility.

14. The issuance of these Orders by the Director does not release Respondent of any liability Respondent may have incurred for any violations which may have occurred at the Facility prior to the effective date of these Orders. The issuance of these Orders does not release Respondent from any obligation Respondent has to comply with the State of Ohio's environmental laws, or any variance, except as otherwise specifically provided herein.

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

VI. TERMINATION

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

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

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

VII. OTHER CLAIMS

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

VIII. OTHER APPLICABLE LAWS

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

IX. RESERVATION OF RIGHTS

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

X. NOTICE

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

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

and Ohio EPA Central Office at the following address:

For mailings, use the post office box number:

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

For deliveries to the building:

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

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

XI. MODIFICATIONS

These Orders, including the application, may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be processed by the

administrative requirements found in OAC rule 3745-50-51. The effective date of the modifications shall be the date approved by Ohio EPA.

XII. WAIVER

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

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

XIII. EFFECTIVE DATE

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

XIV. SIGNATORY AUTHORITY

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

IT IS ORDERED AND AGREED:

Ohio Environmental Protection Agency

Laurie A. Stevenson
Director

IT IS SO AGREED:

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

Signature

9.25.2019
Date

Thomas M Kimmel
Printed or Typed Name

President / CEO
Title

SUBSECTION K

K-1: Process Review
40 CFR 264 AA, BB, and CC

USA Lamp & Ballast Recycling has reviewed the Airbag Inflator Deactivation Process emissions with respect to 40 CFR 264 AA, BB, and CC. It has been determined that Subsection AA does apply to the process emissions while BB and CC do not. Two HAPs, benzene and formaldehyde, have been identified as potential emissions from the process.

K-2: Effluent Gas Analysis
(40 CFR 264 AA)

A copy of an effluent gas analysis may be found at Attachment A of this section. It should be noted that the measured amount of both HAPs was 0.0 ppm in the effluent gas. There is, however, a vehicle level limit for both HAPs. These levels are 22.5 ppm for benzene and 2.0 ppm for formaldehyde. USA Lamp & Ballast Recycling has used these values to represent the maximum potential to emit.

K-3: Potential Emission Estimates
40 CFR 264 AA

The calculation of the maximum potential to emit is shown in Attachment B of this subsection. In both cases, the maximum potential to emit is less than 3 lb/hr.

K-4: Air Dispersion Modeling
OAC 3745-114-01

Air dispersion modeling was conducted using the Screen 3 model. Both rural and urban models were run. The RURAL output is at Attachment C and the URBAN output is at Attachment D of this subsection. The worst-case result was used to calculate the ambient effect of the HAPs. In both cases the maximum 1-hr. ground level concentration was less than 10% of the MAGLC.

K-5: Monitoring and Recordkeeping
Ohio EPA Air Permit PO125067

Monitoring and recordkeeping shall be accomplished in accordance with Section C-1-d) of Air Permit PO125067.

K-6 Reporting Requirements
Ohio EPA Air Permit PO125067

Reporting shall be as required by Section C-1-e) of Air Permit PO125067.

Part B Permit Application - Subsection K

Attachment A

Electronic Airbag Deactivation System (EADS) Effluent Gas Analysis

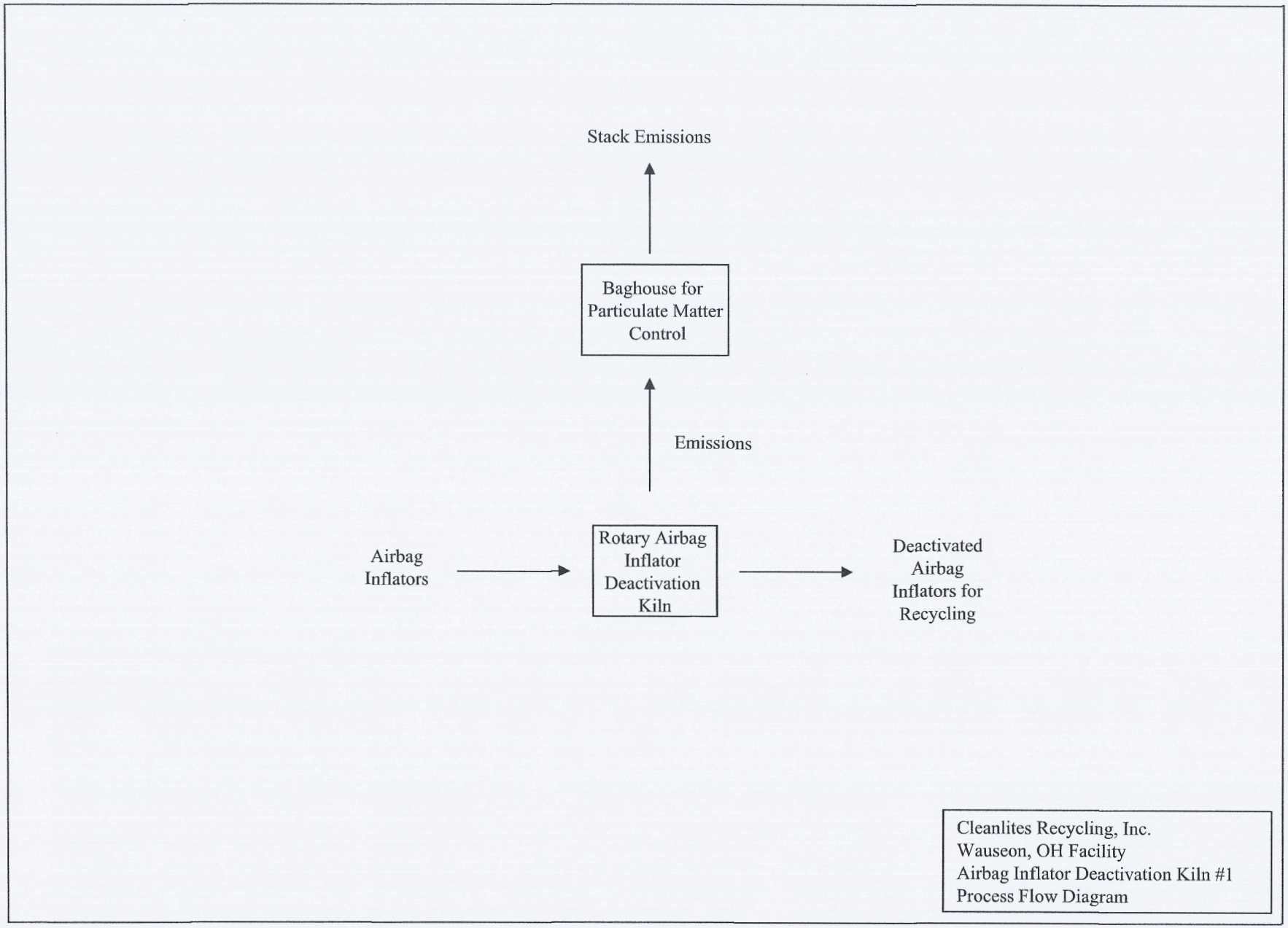
Airbag Inflator Effluent Gas Analysis

Effluent Gases ppm except were noted	Mean Value	Std Deviation	Minimum	Maximum	Analytical Method	Method of Detection	Maximum Value % of Vehicle Limit	Vehicle Level Limit (Maximum ppm)
CO Carbon Monoxide	453.0	N/A	446.3	460.4		FTIR	99.9	461
NO2 Nitrogen Dioxide	19.1	N/A	9.1	11.7		FTIR	234.3	5.0
NO Nitric Oxide	57.3	N/A	57.0	57.7		FTIR	77.0	75.0
NH3 Ammonia	187.1	N/A	184.7	188.6		FTIR	536.8	35.0
H2S Hydrogen Sulfide	-	-	-	-		-	-	15.0
C6H6 Benzene	0.0	N/A	0.0	0.0		FTIR	0.0	22.5
HCN Hydrocyanic Acid	0.3	N/A	0.0	0.6		FTIR	12.8	4.7
HCl Hidrochloric Acid	0.1	N/A	0.0	0.2		FTIR	0.0	5.0
HCHO Formaldehyde	0.0	N/A	0.0	0.0		FTIR	0.0	2.0
COCl2 Phosgene	0.0	N/A	0.0	0.0		FTIR	0.0	0.3
SO2 Sulfur Dioxide	0.1	N/A	0.1	0.1		FTIR	0.0	5.0
CO2 Carbon Dioxide	2577.6	N/A	2475.4	2650.3		FTIR	8.8	30000
C2 Chlorine	-	-	-	-		-	-	1.0
C2H2 Acetylene	1.5	N/A	1.4	1.7		FTIR	0.0	25000
C2H4 Ethylene	0.1	N/A	0.0	0.2		FTIR	0.0	27000
CH4 Methane	21.2	N/A	20.7	22.1		FTIR	0.0	50000
Hydrogen	-	-	-	-		-	-	40000
Total Airborne Particulate mg/m3	127	N/A	95	147		N/A	117.6	125.7
Total <10 Micron particulate mg/m3	-	-	-	-		-	-	Report Only
Water Soluble Particulates mg/m3	-	-	-	-		-	-	75.0
Water Insoluble Particulates mg/m3	-	-	-	-		-	-	50.0
KClO4 as Perchlorate mg/m3	ND	N/A	ND	ND		-	-	Report Only
NaN3 Sodium Azide mg/m3	N/A	N/A	N/A	N/A		-	-	1.43

Attachment B

Electronic Airbag Deactivation System (EADS)
Potential Emissions Estimates

(Excerpts from PTIO Application)


Stack Emissions
Baghouse for Particulate Matter Control
Emissions
Airbag Inflators
Rotary Airbag Inflator Deactivation Kiln
Deactivated Airbag Inflators for Recycling
Cleanlites Recycling, Inc.
Wauseon, OH Facility
Airbag Inflator Deactivation Kiln #1
Process Flow Diagram

Airbag Inflator Deactivation Kiln Potential Emissions Estimates
PTIO Application
Cleanlites Recycling, Inc.
PN: 5082-18-001 by BRG/CJM 9/14/2018

Operational Data:

Maximum Units per Hour	3,000
Maximum Units per Year	26,280,000
Quantity of Gas Produced (mol/unit)	4.00
Quantity of Gas Produced (scf/unit)	3.46

Pass-Through Emissions:

Pollutant		Effluent Concentration (ppmv)[a]	Molecular Weight (g/mol)	Amount per Unit (mol/unit)	Amount per Unit (g/unit)	Amount per Unit (lb/unit)	Potential Emission Rate (lb/hr)	Potential Emission Rate (tons/yr)
CO		690.6	28.01	2.76E-03	0.08	1.70E-04	0.51	2.24
H_2S[b]		15.0	34.08	6.00E-05	2.04E-03	4.50E-06	0.01	0.06
NH_3		282.9	17.03	1.13E-03	0.02	4.25E-05	0.13	0.56
NO		86.6	30.01	3.46E-04	0.01	2.29E-05	0.07	0.30
NO_2		17.55	46.01	7.02E-05	3.23E-03	7.12E-06	0.02	0.09
NOx (NO + NO_2)				4.16E-04	0.01	3.00E-05	0.09	0.39
PM		220.5 mg/m3			0.02	4.76E-05	0.14	0.63
SO_2		5.0	64.07	2.00E-05	1.28E-03	2.82E-06	8.47E-03	0.04
OC/VOC	Acetylene[b]	17.0	26.04	6.80E-05	1.77E-03	3.90E-06	0.01	0.05
	Benzene[b]	22.5	78.11	9.00E-05	7.03E-03	1.55E-05	0.05	0.20
	Ethylene[b]	2.0	28.05	8.00E-06	2.24E-04	4.94E-07	1.48E-03	6.50E-03
	Formaldehyde[b]	2.0	30.03	8.00E-06	2.40E-04	5.29E-07	1.59E-03	6.95E-03
	Phosgene[b]	0.3	98.92	1.20E-06	1.19E-04	2.62E-07	7.85E-04	3.44E-03
	Total						0.06	0.27
HAPs	Benzene[b]	22.5	78.11	9.00E-05	7.03E-03	1.55E-05	0.05	0.20
	HCN	4.7	27.03	1.88E-05	5.08E-04	1.12E-06	3.36E-03	0.01
	HCl	5.0	36.46	2.00E-05	7.29E-04	1.61E-06	4.82E-03	0.02
	Formaldehyde[b]	2.0	30.03	8.00E-06	2.40E-04	5.29E-07	1.59E-03	6.95E-03
	Phosgene[b]	0.3	98.92	1.20E-06	1.19E-04	2.62E-07	7.85E-04	3.44E-03
	Chlorine	1.0	70.90	4.00E-06	2.84E-04	6.25E-07	1.87E-03	8.21E-03
	Total						0.06	0.26

[a]Units of ppmv, unless otherwise indicated. Concentrations based on the greater of the maximum tested value times a safety factor of 1.5 and the vehicle limit except acetylene and ethylene, which had maximum tested values significantly below the vehicle limit. The concentrations used for acetylene and ethylene were 10 times the maximum tested value.

[b]Will be partially destroyed in kiln, but have been included for conservative estimation purposes.

Airbag Inflator Deactivation Kiln Potential Emissions Estimates
PTIO Application
Cleanlites Recycling, Inc.
PN: 5082-18-001 by BRG/CJM 9/14/2018

Combustible Gas Heat Input:

Pollutant	Effluent Concentration (ppmv)[a]	Volume (scf/hr)	Heat Content (BTU/scf)	Heat Input (mmBTU/hr)
Acetylene	17.0	0.18	1,470	2.59E-04
Benzene	22.5	0.23	3,741	8.73E-04
Ethylene	2.0	0.02	1,631	3.38E-05
Formaldehyde	2.0	0.02	626	1.30E-05
Methane	221.0	2.29	1,012	2.32E-03
Phosgene	0.3	3.11E-03	119	3.71E-07
Total			**1,274**	**3.50E-03**

[a]Concentrations based on the greater of the maximum tested value times a safety factor of 1.5 and the vehicle limit except acetylene, ethylene, and methane, which had maximum tested values significantly below the vehicle limit. The concentrations used for acetylene, ethylene, and methane were 10 times the maximum tested value.

Combustion Emissions:

CO Emission Factor (lb/mmBTU)	0.082	AP-42 Section 1.4, Table 1.4-1 (7/98). Combustion emissions assumed similar to those from natural gas combustion because methane accounts for over 83% of the combustible gas concentration.
NOx Emission Factor (lb/mmBTU)	0.098	
CO Emissions (lb/hr)	2.88E-04	
CO Emissions (tons/yr)	1.26E-03	
NOx Emissions (lb/hr)	3.43E-04	
NOx Emissions (tons/yr)	1.50E-03	

Total Potential Emissions:

Pollutant	Potential Emission Rate (lb/hr)	Potential Emission Rate (lb/day)	Potential Emission Rate (tons/yr)
CO	0.51	12.28	2.24
H2S	0.01	0.32	0.06
NH3	0.13	3.06	0.56
NOx	0.09	2.17	0.40
OC/VOC	0.06	1.49	0.27
PM	0.14	3.43	0.63
SO2	8.47E-03	0.20	0.04
Total HAPs	0.06	1.41	0.26

Attachment C

Electronic Airbag Deactivation System (EADS)

Vent Screen 3 Air Dispersion Model (RURAL)

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 13043 ***

Cleanlites Airbag Deactivation Kiln (Rural)

SIMPLE TERRAIN INPUTS:

SOURCE TYPE	=	POINT
EMISSION RATE (G/S)	=	1.00000
STACK HEIGHT (M)	=	10.3700
STK INSIDE DIAM (M)	=	0.3600
STK EXIT VELOCITY (M/S)	=	22.8200
STK GAS EXIT TEMP (K)	=	293.1500
AMBIENT AIR TEMP (K)	=	293.1500
RECEPTOR HEIGHT (M)	=	0.0000
URBAN/RURAL OPTION	=	RURAL
BUILDING HEIGHT (M)	=	7.3200
MIN HORIZ BLDG DIM (M)	=	94.5400
MAX HORIZ BLDG DIM (M)	=	96.4600

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

BUOY. FLUX = 0.000 M**4/S**3; MOM. FLUX = 16.872 M**4/S**2.

*** FULL METEOROLOGY ***

****
*** SCREEN AUTOMATED DISTANCES ***
****

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
1.	0.000	1	1.0	1.0	320.0	34.95	2.06	2.03	NO
100.	233.5	2	2.5	2.5	800.0	14.84	19.27	10.60	SS
200.	230.8	5	5.0	5.1	10000.0	11.34	11.63	7.52	SS
300.	209.2	6	4.0	4.1	10000.0	12.39	11.23	7.03	SS
400.	213.3	6	4.0	4.1	10000.0	12.39	14.64	8.38	SS
500.	197.7	6	4.0	4.1	10000.0	12.39	17.97	9.67	SS
600.	197.4	5	1.0	1.0	10000.0	23.32	32.14	15.15	NO
700.	194.4	5	1.0	1.0	10000.0	23.32	36.96	16.92	NO
800.	184.8	6	1.0	1.0	10000.0	22.14	27.84	12.44	NO
900.	192.3	6	1.0	1.0	10000.0	22.14	30.96	13.41	NO
1000.	194.2	6	1.0	1.0	10000.0	22.14	34.05	14.35	NO
1100.	191.4	6	1.0	1.0	10000.0	22.14	37.12	15.20	NO
1200.	186.6	6	1.0	1.0	10000.0	22.14	40.16	16.01	NO
1300.	180.6	6	1.0	1.0	10000.0	22.14	43.17	16.81	NO
1400.	173.9	6	1.0	1.0	10000.0	22.14	46.17	17.59	NO
1500.	167.0	6	1.0	1.0	10000.0	22.14	49.15	18.34	NO
1600.	160.1	6	1.0	1.0	10000.0	22.14	52.10	19.08	NO
1700.	153.2	6	1.0	1.0	10000.0	22.14	55.04	19.80	NO
1800.	146.5	6	1.0	1.0	10000.0	22.14	57.97	20.51	NO
1900.	140.1	6	1.0	1.0	10000.0	22.14	60.87	21.21	NO
2000.	134.0	6	1.0	1.0	10000.0	22.14	63.76	21.89	NO
2100.	128.2	6	1.0	1.0	10000.0	22.14	66.64	22.46	NO
2200.	122.8	6	1.0	1.0	10000.0	22.14	69.51	23.03	NO
2300.	117.7	6	1.0	1.0	10000.0	22.14	72.36	23.58	NO
2400.	112.9	6	1.0	1.0	10000.0	22.14	75.19	24.12	NO
2500.	108.4	6	1.0	1.0	10000.0	22.14	78.02	24.65	NO
2600.	104.1	6	1.0	1.0	10000.0	22.14	80.83	25.18	NO
2700.	100.2	6	1.0	1.0	10000.0	22.14	83.64	25.69	NO
2800.	96.41	6	1.0	1.0	10000.0	22.14	86.43	26.20	NO

2900.	92.88	6	1.0	1.0	10000.0	22.14	89.21	26.70	NO
3000.	89.55	6	1.0	1.0	10000.0	22.14	91.98	27.19	NO
3500.	75.86	6	1.0	1.0	10000.0	22.14	105.71	29.17	NO
4000.	65.40	6	1.0	1.0	10000.0	22.14	119.22	31.02	NO
4500.	57.20	6	1.0	1.0	10000.0	22.14	132.54	32.75	NO
5000.	50.63	6	1.0	1.0	10000.0	22.14	145.71	34.37	NO
5500.	45.26	6	1.0	1.0	10000.0	22.14	158.73	35.91	NO
6000.	40.81	6	1.0	1.0	10000.0	22.14	171.61	37.38	NO
6500.	37.07	6	1.0	1.0	10000.0	22.14	184.37	38.79	NO
7000.	33.88	6	1.0	1.0	10000.0	22.14	197.02	40.14	NO
7500.	31.22	6	1.0	1.0	10000.0	22.14	209.56	41.30	NO
8000.	28.91	6	1.0	1.0	10000.0	22.14	222.01	42.41	NO
8500.	26.89	6	1.0	1.0	10000.0	22.14	234.36	43.49	NO
9000.	25.11	6	1.0	1.0	10000.0	22.14	246.63	44.53	NO
9500.	23.52	6	1.0	1.0	10000.0	22.14	258.82	45.53	NO
10000.	22.11	6	1.0	1.0	10000.0	22.14	270.92	46.51	NO
15000.	13.47	6	1.0	1.0	10000.0	22.14	388.44	54.99	NO
20000.	9.643	6	1.0	1.0	10000.0	22.14	500.96	60.39	NO
25000.	7.434	6	1.0	1.0	10000.0	22.14	609.76	64.94	NO
30000.	6.008	6	1.0	1.0	10000.0	22.14	715.60	68.92	NO
40000.	4.351	6	1.0	1.0	10000.0	22.14	920.23	74.57	NO
50000.	3.388	6	1.0	1.0	10000.0	22.14	1117.43	79.26	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:

63.	248.1	1	3.0	3.0	960.0	12.63	17.98	9.15	SS

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

****
*** REGULATORY (Default) ***
PERFORMING CAVITY CALCULATIONS
WITH ORIGINAL SCREEN CAVITY MODEL
(BRODE, 1988)
****

*** CAVITY CALCULATION - 1 ***		*** CAVITY CALCULATION - 2 ***	
CONC (UG/M**3) =	0.000	CONC (UG/M**3) =	0.000
CRIT WS @10M (M/S) =	99.99	CRIT WS @10M (M/S) =	99.99
CRIT WS @ HS (M/S) =	99.99	CRIT WS @ HS (M/S) =	99.99
DILUTION WS (M/S) =	99.99	DILUTION WS (M/S) =	99.99
CAVITY HT (M) =	7.32	CAVITY HT (M) =	7.32
CAVITY **LENGTH** (M) =	39.31	CAVITY **LENGTH** (M) =	39.12
ALONGWIND DIM (M) =	94.54	ALONGWIND DIM (M) =	96.46

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S. CONC SET = 0.0

****
END OF CAVITY CALCULATIONS
****

****
*** SUMMARY OF SCREEN MODEL RESULTS ***
****

CALCULATION PROCEDURE	**MAX** CONC (UG/M**3)	DIST TO **MAX** (M)	TERRAIN HT (M)
SIMPLE TERRAIN	248.1	63.	0.

Attachment D

Electronic Airbag Deactivation System (EADS)

Vent Screen 3 Air Dispersion Model (URBAN)

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 13043 ***

Cleanlites Airbag Deactivation Kiln (Urban)

SIMPLE TERRAIN INPUTS:

SOURCE TYPE	=	POINT
EMISSION RATE (G/S)	=	1.00000
STACK HEIGHT (M)	=	10.3700
STK INSIDE DIAM (M)	=	0.3600
STK EXIT VELOCITY (M/S)	=	22.8200
STK GAS EXIT TEMP (K)	=	293.1500
AMBIENT AIR TEMP (K)	=	293.1500
RECEPTOR HEIGHT (M)	=	0.0000
URBAN/RURAL OPTION	=	URBAN
BUILDING HEIGHT (M)	=	7.3200
MIN HORIZ BLDG DIM (M)	=	94.5400
MAX HORIZ BLDG DIM (M)	=	96.4600

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

BUOY. FLUX = 0.000 M**4/S**3; MOM. FLUX = 16.872 M**4/S**2.

*** FULL METEOROLOGY ***

****
*** SCREEN AUTOMATED DISTANCES ***
****

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
1.	0.000	1	1.0	1.0	320.0	34.88	2.04	2.03	NO
100.	367.3	4	2.0	2.0	640.0	16.15	15.69	13.79	SS
200.	312.5	6	1.0	1.0	10000.0	22.18	21.44	14.43	NO
300.	272.1	6	1.0	1.0	10000.0	22.18	31.36	20.21	NO
400.	206.3	6	1.0	1.0	10000.0	22.18	40.99	25.52	NO
500.	157.7	6	1.0	1.0	10000.0	22.18	50.32	30.42	NO
600.	124.0	6	1.0	1.0	10000.0	22.18	59.37	34.99	NO
700.	100.3	6	1.0	1.0	10000.0	22.18	68.14	39.26	NO
800.	83.21	6	1.0	1.0	10000.0	22.18	76.67	43.28	NO
900.	70.44	6	1.0	1.0	10000.0	22.18	84.96	47.09	NO
1000.	60.66	6	1.0	1.0	10000.0	22.18	93.03	50.71	NO
1100.	52.99	6	1.0	1.0	10000.0	22.18	100.89	54.16	NO
1200.	46.85	6	1.0	1.0	10000.0	22.18	108.56	57.47	NO
1300.	41.85	6	1.0	1.0	10000.0	22.18	116.04	60.65	NO
1400.	37.72	6	1.0	1.0	10000.0	22.18	123.34	63.70	NO
1500.	34.25	6	1.0	1.0	10000.0	22.18	130.49	66.65	NO
1600.	31.32	6	1.0	1.0	10000.0	22.18	137.47	69.50	NO
1700.	28.80	6	1.0	1.0	10000.0	22.18	144.31	72.26	NO
1800.	26.63	6	1.0	1.0	10000.0	22.18	151.01	74.94	NO
1900.	24.74	6	1.0	1.0	10000.0	22.18	157.58	77.54	NO
2000.	23.07	6	1.0	1.0	10000.0	22.18	164.01	80.07	NO
2100.	21.60	6	1.0	1.0	10000.0	22.18	170.33	82.54	NO
2200.	20.29	6	1.0	1.0	10000.0	22.18	176.53	84.94	NO
2300.	19.12	6	1.0	1.0	10000.0	22.18	182.62	87.29	NO
2400.	18.07	6	1.0	1.0	10000.0	22.18	188.60	89.58	NO
2500.	17.12	6	1.0	1.0	10000.0	22.18	194.48	91.83	NO
2600.	16.26	6	1.0	1.0	10000.0	22.18	200.27	94.03	NO
2700.	15.48	6	1.0	1.0	10000.0	22.18	205.96	96.18	NO
2800.	14.76	6	1.0	1.0	10000.0	22.18	211.56	98.29	NO
2900.	14.10	6	1.0	1.0	10000.0	22.18	217.08	100.36	NO
3000.	13.50	6	1.0	1.0	10000.0	22.18	222.51	102.39	NO

```
  3500.     11.09         6     1.0     1.0 10000.0   22.18   248.54   112.05     NO
  4000.     9.377         6     1.0     1.0 10000.0   22.18   272.90   121.00     NO
  4500.     8.107         6     1.0     1.0 10000.0   22.18   295.84   129.36     NO
  5000.     7.131         6     1.0     1.0 10000.0   22.18   317.56   137.24     NO
  5500.     6.358         6     1.0     1.0 10000.0   22.18   338.22   144.71     NO
  6000.     5.732         6     1.0     1.0 10000.0   22.18   357.95   151.83     NO
  6500.     5.216         6     1.0     1.0 10000.0   22.18   376.85   158.63     NO
  7000.     4.783         6     1.0     1.0 10000.0   22.18   395.02   165.17     NO
  7500.     4.414         6     1.0     1.0 10000.0   22.18   412.51   171.46     NO
  8000.     4.098         6     1.0     1.0 10000.0   22.18   429.41   177.54     NO
  8500.     3.823         6     1.0     1.0 10000.0   22.18   445.76   183.41     NO
  9000.     3.582         6     1.0     1.0 10000.0   22.18   461.60   189.11     NO
  9500.     3.369         6     1.0     1.0 10000.0   22.18   476.99   194.65     NO
 10000.     3.180         6     1.0     1.0 10000.0   22.18   491.95   200.03     NO
 15000.     2.031         6     1.0     1.0 10000.0   22.18   623.65   247.56     NO
 20000.     1.490         6     1.0     1.0 10000.0   22.18   733.34   287.39     NO
 25000.     1.175         6     1.0     1.0 10000.0   22.18   829.16   322.35     NO
 30000.    0.9702         6     1.0     1.0 10000.0   22.18   915.26   353.88     NO
 40000.    0.7959         4     1.0     1.0   320.0   34.79  1552.24  1553.18     NO
 50000.    0.7077         4     1.0     1.0   320.0   34.79  1745.76  1750.01     NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND      1. M:
    45.     527.7         3     2.5     2.5   800.0   12.71    10.03     9.20     SS

 DWASH=   MEANS NO CALC MADE (CONC = 0.0)
 DWASH=NO MEANS NO BUILDING DOWNWASH USED
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

**************************************
     *** REGULATORY (Default) ***
    PERFORMING CAVITY CALCULATIONS
  WITH ORIGINAL SCREEN CAVITY MODEL
          (BRODE, 1988)
**************************************


 *** CAVITY CALCULATION - 1 ***       *** CAVITY CALCULATION - 2 ***
  CONC (UG/M**3)      =    0.000        CONC (UG/M**3)      =    0.000
  CRIT WS @10M (M/S) =    99.99        CRIT WS @10M (M/S) =    99.99
  CRIT WS @ HS (M/S) =    99.99        CRIT WS @ HS (M/S) =    99.99
  DILUTION WS (M/S)  =    99.99        DILUTION WS (M/S)  =    99.99
  CAVITY HT (M)      =     7.32        CAVITY HT (M)      =     7.32
  CAVITY LENGTH (M)  =    39.31        CAVITY LENGTH (M)  =    39.12
  ALONGWIND DIM (M)  =    94.54        ALONGWIND DIM (M)  =    96.46

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S.  CONC SET = 0.0

**************************************
      END OF CAVITY CALCULATIONS
**************************************


     ***************************************
     *** SUMMARY OF SCREEN MODEL RESULTS ***
     ***************************************

 CALCULATION         MAX CONC     DIST TO    TERRAIN
  PROCEDURE         (UG/M**3)     MAX (M)     HT (M)
-------------     -----------    ---------    -------
SIMPLE TERRAIN       527.7           45.         0.
```

Attachment E

Ohio EPA Air Toxic Pollutant Ambient Analysis

Ohio EPA Air Toxic Pollutant Ambient Impact Analysis
PTIO Application
Cleanlites Recycling, Inc.
PN: 5082-18-001 by DJM/BRG 1/11/2019

Based on the maximum process specifications, the potential emissions of all Ohio EPA air toxics, as listed in OAC 3745-114-01, are less than 1 ton/yr from the proposed airbag deactivation kiln. However, due to private properties in close proximity to the emissions unit location, modeling of two highly toxic compounds (benzene and formaldehyde) was required by Ohio EPA. Per Engineering Guide #70, modeling may be required for any highly toxic compounds classified as A1 or A2 carcinogens, despite emission rates less than 1.0 ton per year.

USEPA SCREEN3 Modeling Analysis:

SCREEN3 Model Inputs:

Unit Emission Rate (g/s)	1.00
Unit Emission Rate (lb/hr)	7.94
Stack Release Height (m)	10.37
Stack Inside Diameter (m)	0.36
Stack Gas Flow Rate (acfm)	4,800
Stack Gas Velocity (m/s)	22.82
Stack Gas Temperature (K)	293.15
Ambient Temperature (K)	293.15
Building Height (m)	7.32
Building Width (m)	94.54
Building Length (m)	96.46

SCREEN3 Model Output:

Maximum Modeled Unit Emission Rate 1-Hr Concentration ($\mu g/m^3$)	527.67

Air Toxics Maximum Modeled 1-Hr Concentration:

Maximum Benzene Hourly Emission Rate (lb/hr)	0.05
Benzene ($\mu g/m^3$)	3.09
Maximum Formaldehyde Hourly Emission Rate (lb/hr)	1.59E-03
Formaldehyde ($\mu g/m^3$)	0.11

Ohio EPA Air Toxic Pollutant Ambient Impact Analysis
PTIO Application
Cleanlites Recycling, Inc.
PN: 5082-18-001 by DJM/BRG 1/11/2019

OEPA MAGLC Calculations:

Benzene:

TWA (ppm)	0.5
Molecular Weight	78.11
TLV (mg/m^3)	1.60
MAGLC ($\mu g/m^3$)	38.03
Maximum Modeled 1-hr Ground Level Concentration ($\mu g/m^3$)	3.09
Percentage of MAGLC (%)	8.12%

Formaldehyde:

TWA (ppm)	0.1
Molecular Weight	30.03
TLV (mg/m^3)	0.12
MAGLC ($\mu g/m^3$)	2.92
Maximum Modeled 1-hr Ground Level Concentration ($\mu g/m^3$)	0.11
Percentage of MAGLC (%)	3.61%

SUBSECTION K

K-1: Process Review
40 CFR 264 AA, BB, and CC

USA Lamp & Ballast Recycling has reviewed the Airbag Inflator Deactivation Process emissions with respect to 40 CFR 264 AA, BB, and CC. It has been determined that Subsection AA does apply to the process emissions while BB and CC do not. Two HAPs, benzene and formaldehyde, have been identified as potential emissions from the process.

K-2: Effluent Gas Analysis
(40 CFR 264 AA)

A copy of an effluent gas analysis may be found at Attachment A of this section. It should be noted that the measured amount of both HAPs was 0.0 ppm in the effluent gas. There is, however, a vehicle level limit for both HAPs. These levels are 22.5 ppm for benzene and 2.0 ppm for formaldehyde. USA Lamp & Ballast Recycling has used these values to represent the maximum potential to emit.

K-3: Potential Emission Estimates
40 CFR 264 AA

The calculation of the maximum potential to emit is shown in Attachment B of this subsection. In both cases, the maximum potential to emit is less than 3 lb/hr.

K-4: Air Dispersion Modeling
OAC 3745-114-01

Air dispersion modeling was conducted using the Screen 3 model. Both rural and urban models were run. The RURAL output is at Attachment C and the URBAN output is at Attachment D of this subsection. The worst-case result was used to calculate the ambient effect of the HAPs. In both cases the maximum 1-hr. ground level concentration was less than 10% of the MAGLC.

K-5: Monitoring and Recordkeeping
Ohio EPA Air Permit PO125067

Monitoring and recordkeeping shall be accomplished in accordance with Section C-1-d) of Air Permit PO125067.

K-6 Reporting Requirements
Ohio EPA Air Permit PO125067

Reporting shall be as required by Section C-1-e) of Air Permit PO125067.

Part B Permit Application - Subsection K

Attachment A

Electronic Airbag Deactivation System (EADS) Effluent Gas Analysis

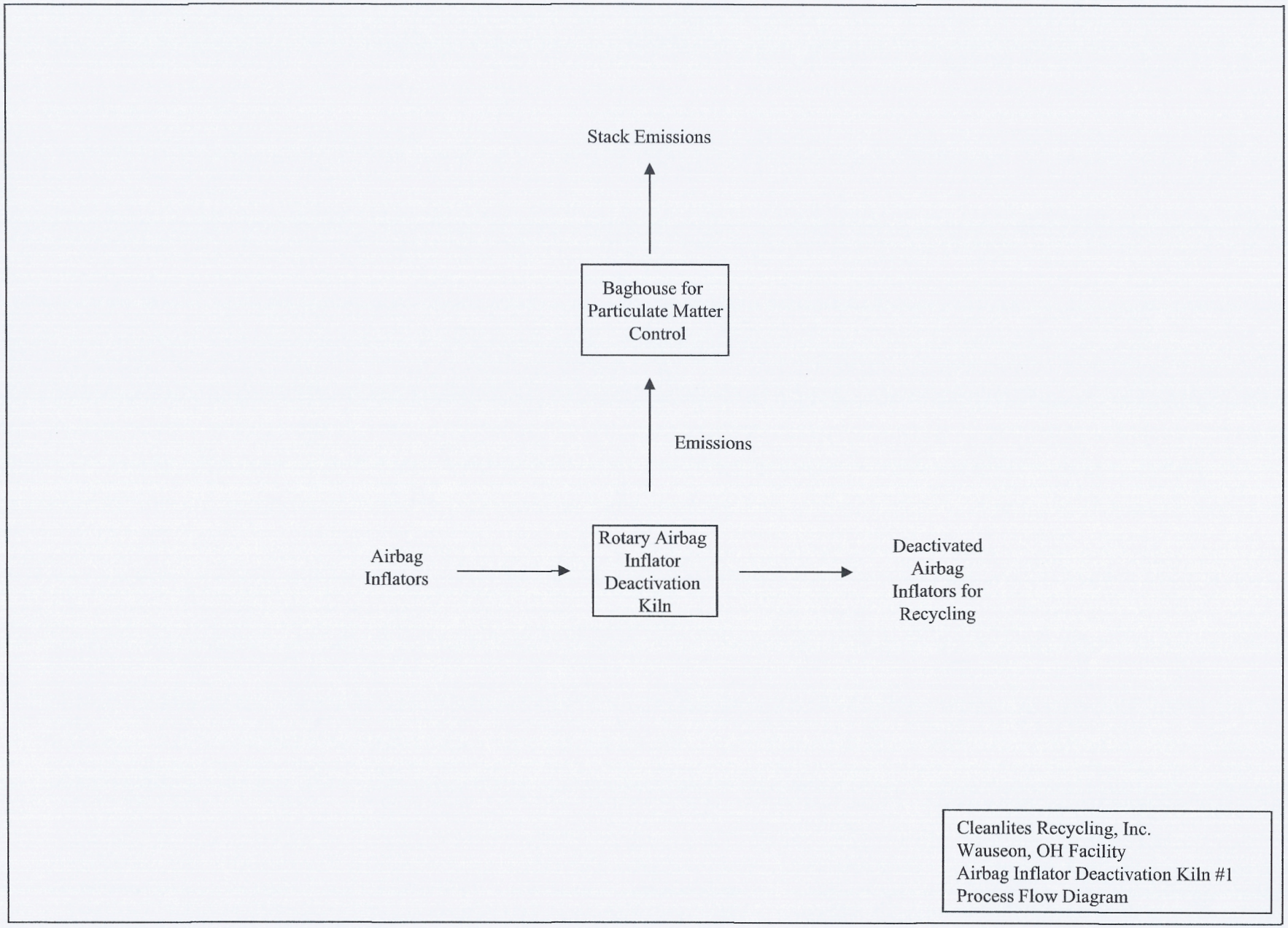
Airbag Inflator Effluent Gas Analysis

Effluent Gases ppm except were noted	Mean Value	Std Deviation	Minimum	Maximum	Analytical Method	Method of Detection	Maximum Value % of Vehicle Limit	Vehicle Level Limit (Maximum ppm)
CO Carbon Monoxide	453.0	N/A	446.3	460.4		FTIR	99.9	461
NO2 Nitrogen Dioxide	19.1	N/A	9.1	11.7		FTIR	234.3	5.0
NO Nitric Oxide	57.3	N/A	57.0	57.7		FTIR	77.0	75.0
NH3 Ammonia	187.1	N/A	184.7	188.6		FTIR	536.8	35.0
H2S Hydrogen Sulfide	-	-	-	-		-	-	15.0
C6H6 Benzene	0.0	N/A	0.0	0.0		FTIR	0.0	22.5
HCN Hydrocyanic Acid	0.3	N/A	0.0	0.6		FTIR	12.8	4.7
HCl Hidrochloric Acid	0.1	N/A	0.0	0.2		FTIR	0.0	5.0
HCHO Formaldehyde	0.0	N/A	0.0	0.0		FTIR	0.0	2.0
COCl2 Phosgene	0.0	N/A	0.0	0.0		FTIR	0.0	0.3
SO2 Sulfur Dioxide	0.1	N/A	0.1	0.1		FTIR	0.0	5.0
CO2 Carbon Dioxide	2577.6	N/A	2475.4	2650.3		FTIR	8.8	30000
C2 Chlorine	-	-	-	-		-	-	1.0
C2H2 Acetylene	1.5	N/A	1.4	1.7		FTIR	0.0	25000
C2H4 Ethylene	0.1	N/A	0.0	0.2		FTIR	0.0	27000
CH4 Methane	21.2	N/A	20.7	22.1		FTIR	0.0	50000
Hydrogen	-	-	-	-		-	-	40000
Total Airborne Particulate mg/m3	127	N/A	95	147		N/A	117.6	125.7
Total <10 Micron particulate mg/m3	-	-	-	-		-	-	Report Only
Water Soluble Particulates mg/m3	-	-	-	-		-	-	75.0
Water Insoluble Particulates mg/m3	-	-	-	-		-	-	50.0
KClO4 as Perchlorate mg/m3	ND	N/A	ND	ND		-	-	Report Only
NaN3 Sodium Azide mg/m3	N/A	N/A	N/A	N/A		-	-	1.43

Attachment B

Electronic Airbag Deactivation System (EADS)
Potential Emissions Estimates

(Excerpts from PTIO Application)


Stack Emissions
Baghouse for Particulate Matter Control
Emissions
Airbag Inflators
Rotary Airbag Inflator Deactivation Kiln
Deactivated Airbag Inflators for Recycling
Cleanlites Recycling, Inc.
Wauseon, OH Facility
Airbag Inflator Deactivation Kiln #1
Process Flow Diagram

Airbag Inflator Deactivation Kiln Potential Emissions Estimates
PTIO Application
Cleanlites Recycling, Inc.
PN: 5082-18-001 by BRG/CJM 9/14/2018

Operational Data:

Maximum Units per Hour	3,000
Maximum Units per Year	26,280,000
Quantity of Gas Produced (mol/unit)	4.00
Quantity of Gas Produced (scf/unit)	3.46

Pass-Through Emissions:

Pollutant		Effluent Concentration (ppmv)[a]	Molecular Weight (g/mol)	Amount per Unit (mol/unit)	Amount per Unit (g/unit)	Amount per Unit (lb/unit)	Potential Emission Rate (lb/hr)	Potential Emission Rate (tons/yr)
CO		690.6	28.01	2.76E-03	0.08	1.70E-04	0.51	2.24
H_2S[b]		15.0	34.08	6.00E-05	2.04E-03	4.50E-06	0.01	0.06
NH_3		282.9	17.03	1.13E-03	0.02	4.25E-05	0.13	0.56
NO		86.6	30.01	3.46E-04	0.01	2.29E-05	0.07	0.30
NO_2		17.55	46.01	7.02E-05	3.23E-03	7.12E-06	0.02	0.09
NOx (NO + NO_2)				4.16E-04	0.01	3.00E-05	0.09	0.39
PM		220.5 mg/m3			0.02	4.76E-05	0.14	0.63
SO_2		5.0	64.07	2.00E-05	1.28E-03	2.82E-06	8.47E-03	0.04
OC/VOC	Acetylene[b]	17.0	26.04	6.80E-05	1.77E-03	3.90E-06	0.01	0.05
	Benzene[b]	22.5	78.11	9.00E-05	7.03E-03	1.55E-05	0.05	0.20
	Ethylene[b]	2.0	28.05	8.00E-06	2.24E-04	4.94E-07	1.48E-03	6.50E-03
	Formaldehyde[b]	2.0	30.03	8.00E-06	2.40E-04	5.29E-07	1.59E-03	6.95E-03
	Phosgene[b]	0.3	98.92	1.20E-06	1.19E-04	2.62E-07	7.85E-04	3.44E-03
	Total						0.06	0.27
HAPs	Benzene[b]	22.5	78.11	9.00E-05	7.03E-03	1.55E-05	0.05	0.20
	HCN	4.7	27.03	1.88E-05	5.08E-04	1.12E-06	3.36E-03	0.01
	HCl	5.0	36.46	2.00E-05	7.29E-04	1.61E-06	4.82E-03	0.02
	Formaldehyde[b]	2.0	30.03	8.00E-06	2.40E-04	5.29E-07	1.59E-03	6.95E-03
	Phosgene[b]	0.3	98.92	1.20E-06	1.19E-04	2.62E-07	7.85E-04	3.44E-03
	Chlorine	1.0	70.90	4.00E-06	2.84E-04	6.25E-07	1.87E-03	8.21E-03
	Total						0.06	0.26

[a]Units of ppmv, unless otherwise indicated. Concentrations based on the greater of the maximum tested value times a safety factor of 1.5 and the vehicle limit except acetylene and ethylene, which had maximum tested values significantly below the vehicle limit. The concentrations used for acetylene and ethylene were 10 times the maximum tested value.

[b]Will be partially destroyed in kiln, but have been included for conservative estimation purposes.

Airbag Inflator Deactivation Kiln Potential Emissions Estimates
PTIO Application
Cleanlites Recycling, Inc.
PN: 5082-18-001 by BRG/CJM 9/14/2018

Combustible Gas Heat Input:

Pollutant	Effluent Concentration (ppmv)[a]	Volume (scf/hr)	Heat Content (BTU/scf)	Heat Input (mmBTU/hr)
Acetylene	17.0	0.18	1,470	2.59E-04
Benzene	22.5	0.23	3,741	8.73E-04
Ethylene	2.0	0.02	1,631	3.38E-05
Formaldehyde	2.0	0.02	626	1.30E-05
Methane	221.0	2.29	1,012	2.32E-03
Phosgene	0.3	3.11E-03	119	3.71E-07
Total			**1,274**	**3.50E-03**

[a]Concentrations based on the greater of the maximum tested value times a safety factor of 1.5 and the vehicle limit except acetylene, ethylene, and methane, which had maximum tested values significantly below the vehicle limit. The concentrations used for acetylene, ethylene, and methane were 10 times the maximum tested value.

Combustion Emissions:

CO Emission Factor (lb/mmBTU)	0.082	AP-42 Section 1.4, Table 1.4-1 (7/98). Combustion emissions assumed similar to those from natural gas combustion because methane accounts for over 83% of the combustible gas concentration.
NOx Emission Factor (lb/mmBTU)	0.098	
CO Emissions (lb/hr)	2.88E-04	
CO Emissions (tons/yr)	1.26E-03	
NOx Emissions (lb/hr)	3.43E-04	
NOx Emissions (tons/yr)	1.50E-03	

Total Potential Emissions:

Pollutant	Potential Emission Rate (lb/hr)	Potential Emission Rate (lb/day)	Potential Emission Rate (tons/yr)
CO	0.51	12.28	2.24
H2S	0.01	0.32	0.06
NH3	0.13	3.06	0.56
NOx	0.09	2.17	0.40
OC/VOC	0.06	1.49	0.27
PM	0.14	3.43	0.63
SO2	8.47E-03	0.20	0.04
Total HAPs	0.06	1.41	0.26

Attachment C

Electronic Airbag Deactivation System (EADS)

Vent Screen 3 Air Dispersion Model (RURAL)

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 13043 ***

Cleanlites Airbag Deactivation Kiln (Rural)

SIMPLE TERRAIN INPUTS:

SOURCE TYPE	=	POINT
EMISSION RATE (G/S)	=	1.00000
STACK HEIGHT (M)	=	10.3700
STK INSIDE DIAM (M)	=	0.3600
STK EXIT VELOCITY (M/S)	=	22.8200
STK GAS EXIT TEMP (K)	=	293.1500
AMBIENT AIR TEMP (K)	=	293.1500
RECEPTOR HEIGHT (M)	=	0.0000
URBAN/RURAL OPTION	=	RURAL
BUILDING HEIGHT (M)	=	7.3200
MIN HORIZ BLDG DIM (M)	=	94.5400
MAX HORIZ BLDG DIM (M)	=	96.4600

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

BUOY. FLUX = 0.000 M**4/S**3; MOM. FLUX = 16.872 M**4/S**2.

*** FULL METEOROLOGY ***

****
*** SCREEN AUTOMATED DISTANCES ***
****

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
1.	0.000	1	1.0	1.0	320.0	34.95	2.06	2.03	NO
100.	233.5	2	2.5	2.5	800.0	14.84	19.27	10.60	SS
200.	230.8	5	5.0	5.1	10000.0	11.34	11.63	7.52	SS
300.	209.2	6	4.0	4.1	10000.0	12.39	11.23	7.03	SS
400.	213.3	6	4.0	4.1	10000.0	12.39	14.64	8.38	SS
500.	197.7	6	4.0	4.1	10000.0	12.39	17.97	9.67	SS
600.	197.4	5	1.0	1.0	10000.0	23.32	32.14	15.15	NO
700.	194.4	5	1.0	1.0	10000.0	23.32	36.96	16.92	NO
800.	184.8	6	1.0	1.0	10000.0	22.14	27.84	12.44	NO
900.	192.3	6	1.0	1.0	10000.0	22.14	30.96	13.41	NO
1000.	194.2	6	1.0	1.0	10000.0	22.14	34.05	14.35	NO
1100.	191.4	6	1.0	1.0	10000.0	22.14	37.12	15.20	NO
1200.	186.6	6	1.0	1.0	10000.0	22.14	40.16	16.01	NO
1300.	180.6	6	1.0	1.0	10000.0	22.14	43.17	16.81	NO
1400.	173.9	6	1.0	1.0	10000.0	22.14	46.17	17.59	NO
1500.	167.0	6	1.0	1.0	10000.0	22.14	49.15	18.34	NO
1600.	160.1	6	1.0	1.0	10000.0	22.14	52.10	19.08	NO
1700.	153.2	6	1.0	1.0	10000.0	22.14	55.04	19.80	NO
1800.	146.5	6	1.0	1.0	10000.0	22.14	57.97	20.51	NO
1900.	140.1	6	1.0	1.0	10000.0	22.14	60.87	21.21	NO
2000.	134.0	6	1.0	1.0	10000.0	22.14	63.76	21.89	NO
2100.	128.2	6	1.0	1.0	10000.0	22.14	66.64	22.46	NO
2200.	122.8	6	1.0	1.0	10000.0	22.14	69.51	23.03	NO
2300.	117.7	6	1.0	1.0	10000.0	22.14	72.36	23.58	NO
2400.	112.9	6	1.0	1.0	10000.0	22.14	75.19	24.12	NO
2500.	108.4	6	1.0	1.0	10000.0	22.14	78.02	24.65	NO
2600.	104.1	6	1.0	1.0	10000.0	22.14	80.83	25.18	NO
2700.	100.2	6	1.0	1.0	10000.0	22.14	83.64	25.69	NO
2800.	96.41	6	1.0	1.0	10000.0	22.14	86.43	26.20	NO

2900.	92.88	6	1.0	1.0	10000.0	22.14	89.21	26.70	NO
3000.	89.55	6	1.0	1.0	10000.0	22.14	91.98	27.19	NO
3500.	75.86	6	1.0	1.0	10000.0	22.14	105.71	29.17	NO
4000.	65.40	6	1.0	1.0	10000.0	22.14	119.22	31.02	NO
4500.	57.20	6	1.0	1.0	10000.0	22.14	132.54	32.75	NO
5000.	50.63	6	1.0	1.0	10000.0	22.14	145.71	34.37	NO
5500.	45.26	6	1.0	1.0	10000.0	22.14	158.73	35.91	NO
6000.	40.81	6	1.0	1.0	10000.0	22.14	171.61	37.38	NO
6500.	37.07	6	1.0	1.0	10000.0	22.14	184.37	38.79	NO
7000.	33.88	6	1.0	1.0	10000.0	22.14	197.02	40.14	NO
7500.	31.22	6	1.0	1.0	10000.0	22.14	209.56	41.30	NO
8000.	28.91	6	1.0	1.0	10000.0	22.14	222.01	42.41	NO
8500.	26.89	6	1.0	1.0	10000.0	22.14	234.36	43.49	NO
9000.	25.11	6	1.0	1.0	10000.0	22.14	246.63	44.53	NO
9500.	23.52	6	1.0	1.0	10000.0	22.14	258.82	45.53	NO
10000.	22.11	6	1.0	1.0	10000.0	22.14	270.92	46.51	NO
15000.	13.47	6	1.0	1.0	10000.0	22.14	388.44	54.99	NO
20000.	9.643	6	1.0	1.0	10000.0	22.14	500.96	60.39	NO
25000.	7.434	6	1.0	1.0	10000.0	22.14	609.76	64.94	NO
30000.	6.008	6	1.0	1.0	10000.0	22.14	715.60	68.92	NO
40000.	4.351	6	1.0	1.0	10000.0	22.14	920.23	74.57	NO
50000.	3.388	6	1.0	1.0	10000.0	22.14	1117.43	79.26	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:

63.	248.1	1	3.0	3.0	960.0	12.63	17.98	9.15	SS

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

****
*** REGULATORY (Default) ***
PERFORMING CAVITY CALCULATIONS
WITH ORIGINAL SCREEN CAVITY MODEL
(BRODE, 1988)
****

*** CAVITY CALCULATION - 1 ***		*** CAVITY CALCULATION - 2 ***	
CONC (UG/M**3) =	0.000	CONC (UG/M**3) =	0.000
CRIT WS @10M (M/S) =	99.99	CRIT WS @10M (M/S) =	99.99
CRIT WS @ HS (M/S) =	99.99	CRIT WS @ HS (M/S) =	99.99
DILUTION WS (M/S) =	99.99	DILUTION WS (M/S) =	99.99
CAVITY HT (M) =	7.32	CAVITY HT (M) =	7.32
CAVITY **LENGTH** (M) =	39.31	CAVITY **LENGTH** (M) =	39.12
ALONGWIND DIM (M) =	94.54	ALONGWIND DIM (M) =	96.46

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S. CONC SET = 0.0

****
END OF CAVITY CALCULATIONS
****

****
*** SUMMARY OF SCREEN MODEL RESULTS ***
****

CALCULATION PROCEDURE	**MAX** CONC (UG/M**3)	DIST TO **MAX** (M)	TERRAIN HT (M)
SIMPLE TERRAIN	248.1	63.	0.

Attachment D

Electronic Airbag Deactivation System (EADS)

Vent Screen 3 Air Dispersion Model (URBAN)

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 13043 ***

Cleanlites Airbag Deactivation Kiln (Urban)

SIMPLE TERRAIN INPUTS:

SOURCE TYPE	=	POINT
EMISSION RATE (G/S)	=	1.00000
STACK HEIGHT (M)	=	10.3700
STK INSIDE DIAM (M)	=	0.3600
STK EXIT VELOCITY (M/S)	=	22.8200
STK GAS EXIT TEMP (K)	=	293.1500
AMBIENT AIR TEMP (K)	=	293.1500
RECEPTOR HEIGHT (M)	=	0.0000
URBAN/RURAL OPTION	=	URBAN
BUILDING HEIGHT (M)	=	7.3200
MIN HORIZ BLDG DIM (M)	=	94.5400
MAX HORIZ BLDG DIM (M)	=	96.4600

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

BUOY. FLUX = 0.000 M**4/S**3; MOM. FLUX = 16.872 M**4/S**2.

*** FULL METEOROLOGY ***

****
*** SCREEN AUTOMATED DISTANCES ***
****

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
1.	0.000	1	1.0	1.0	320.0	34.88	2.04	2.03	NO
100.	367.3	4	2.0	2.0	640.0	16.15	15.69	13.79	SS
200.	312.5	6	1.0	1.0	10000.0	22.18	21.44	14.43	NO
300.	272.1	6	1.0	1.0	10000.0	22.18	31.36	20.21	NO
400.	206.3	6	1.0	1.0	10000.0	22.18	40.99	25.52	NO
500.	157.7	6	1.0	1.0	10000.0	22.18	50.32	30.42	NO
600.	124.0	6	1.0	1.0	10000.0	22.18	59.37	34.99	NO
700.	100.3	6	1.0	1.0	10000.0	22.18	68.14	39.26	NO
800.	83.21	6	1.0	1.0	10000.0	22.18	76.67	43.28	NO
900.	70.44	6	1.0	1.0	10000.0	22.18	84.96	47.09	NO
1000.	60.66	6	1.0	1.0	10000.0	22.18	93.03	50.71	NO
1100.	52.99	6	1.0	1.0	10000.0	22.18	100.89	54.16	NO
1200.	46.85	6	1.0	1.0	10000.0	22.18	108.56	57.47	NO
1300.	41.85	6	1.0	1.0	10000.0	22.18	116.04	60.65	NO
1400.	37.72	6	1.0	1.0	10000.0	22.18	123.34	63.70	NO
1500.	34.25	6	1.0	1.0	10000.0	22.18	130.49	66.65	NO
1600.	31.32	6	1.0	1.0	10000.0	22.18	137.47	69.50	NO
1700.	28.80	6	1.0	1.0	10000.0	22.18	144.31	72.26	NO
1800.	26.63	6	1.0	1.0	10000.0	22.18	151.01	74.94	NO
1900.	24.74	6	1.0	1.0	10000.0	22.18	157.58	77.54	NO
2000.	23.07	6	1.0	1.0	10000.0	22.18	164.01	80.07	NO
2100.	21.60	6	1.0	1.0	10000.0	22.18	170.33	82.54	NO
2200.	20.29	6	1.0	1.0	10000.0	22.18	176.53	84.94	NO
2300.	19.12	6	1.0	1.0	10000.0	22.18	182.62	87.29	NO
2400.	18.07	6	1.0	1.0	10000.0	22.18	188.60	89.58	NO
2500.	17.12	6	1.0	1.0	10000.0	22.18	194.48	91.83	NO
2600.	16.26	6	1.0	1.0	10000.0	22.18	200.27	94.03	NO
2700.	15.48	6	1.0	1.0	10000.0	22.18	205.96	96.18	NO
2800.	14.76	6	1.0	1.0	10000.0	22.18	211.56	98.29	NO
2900.	14.10	6	1.0	1.0	10000.0	22.18	217.08	100.36	NO
3000.	13.50	6	1.0	1.0	10000.0	22.18	222.51	102.39	NO

```
  3500.     11.09         6     1.0     1.0 10000.0   22.18   248.54   112.05     NO
  4000.     9.377         6     1.0     1.0 10000.0   22.18   272.90   121.00     NO
  4500.     8.107         6     1.0     1.0 10000.0   22.18   295.84   129.36     NO
  5000.     7.131         6     1.0     1.0 10000.0   22.18   317.56   137.24     NO
  5500.     6.358         6     1.0     1.0 10000.0   22.18   338.22   144.71     NO
  6000.     5.732         6     1.0     1.0 10000.0   22.18   357.95   151.83     NO
  6500.     5.216         6     1.0     1.0 10000.0   22.18   376.85   158.63     NO
  7000.     4.783         6     1.0     1.0 10000.0   22.18   395.02   165.17     NO
  7500.     4.414         6     1.0     1.0 10000.0   22.18   412.51   171.46     NO
  8000.     4.098         6     1.0     1.0 10000.0   22.18   429.41   177.54     NO
  8500.     3.823         6     1.0     1.0 10000.0   22.18   445.76   183.41     NO
  9000.     3.582         6     1.0     1.0 10000.0   22.18   461.60   189.11     NO
  9500.     3.369         6     1.0     1.0 10000.0   22.18   476.99   194.65     NO
 10000.     3.180         6     1.0     1.0 10000.0   22.18   491.95   200.03     NO
 15000.     2.031         6     1.0     1.0 10000.0   22.18   623.65   247.56     NO
 20000.     1.490         6     1.0     1.0 10000.0   22.18   733.34   287.39     NO
 25000.     1.175         6     1.0     1.0 10000.0   22.18   829.16   322.35     NO
 30000.    0.9702         6     1.0     1.0 10000.0   22.18   915.26   353.88     NO
 40000.    0.7959         4     1.0     1.0   320.0   34.79  1552.24  1553.18     NO
 50000.    0.7077         4     1.0     1.0   320.0   34.79  1745.76  1750.01     NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND      1. M:
    45.     527.7         3     2.5     2.5   800.0   12.71    10.03     9.20     SS

 DWASH=   MEANS NO CALC MADE (CONC = 0.0)
 DWASH=NO MEANS NO BUILDING DOWNWASH USED
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

**************************************
     *** REGULATORY (Default) ***
    PERFORMING CAVITY CALCULATIONS
  WITH ORIGINAL SCREEN CAVITY MODEL
          (BRODE, 1988)
**************************************


 *** CAVITY CALCULATION - 1 ***       *** CAVITY CALCULATION - 2 ***
  CONC (UG/M**3)      =    0.000        CONC (UG/M**3)      =    0.000
  CRIT WS @10M (M/S) =    99.99        CRIT WS @10M (M/S) =    99.99
  CRIT WS @ HS (M/S) =    99.99        CRIT WS @ HS (M/S) =    99.99
  DILUTION WS (M/S)  =    99.99        DILUTION WS (M/S)  =    99.99
  CAVITY HT (M)      =     7.32        CAVITY HT (M)      =     7.32
  CAVITY LENGTH (M)  =    39.31        CAVITY LENGTH (M)  =    39.12
  ALONGWIND DIM (M)  =    94.54        ALONGWIND DIM (M)  =    96.46

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S.  CONC SET = 0.0

**************************************
      END OF CAVITY CALCULATIONS
**************************************


     ***************************************
     *** SUMMARY OF SCREEN MODEL RESULTS ***
     ***************************************

 CALCULATION         MAX CONC     DIST TO    TERRAIN
  PROCEDURE         (UG/M**3)     MAX (M)     HT (M)
-------------     -----------    ---------    -------
SIMPLE TERRAIN       527.7           45.         0.
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Attachment E

Ohio EPA Air Toxic Pollutant Ambient Analysis

Ohio EPA Air Toxic Pollutant Ambient Impact Analysis
PTIO Application
Cleanlites Recycling, Inc.
PN: 5082-18-001 by DJM/BRG 1/11/2019

Based on the maximum process specifications, the potential emissions of all Ohio EPA air toxics, as listed in OAC 3745-114-01, are less than 1 ton/yr from the proposed airbag deactivation kiln. However, due to private properties in close proximity to the emissions unit location, modeling of two highly toxic compounds (benzene and formaldehyde) was required by Ohio EPA. Per Engineering Guide #70, modeling may be required for any highly toxic compounds classified as A1 or A2 carcinogens, despite emission rates less than 1.0 ton per year.

USEPA SCREEN3 Modeling Analysis:

SCREEN3 Model Inputs:

Unit Emission Rate (g/s)	1.00
Unit Emission Rate (lb/hr)	7.94
Stack Release Height (m)	10.37
Stack Inside Diameter (m)	0.36
Stack Gas Flow Rate (acfm)	4,800
Stack Gas Velocity (m/s)	22.82
Stack Gas Temperature (K)	293.15
Ambient Temperature (K)	293.15
Building Height (m)	7.32
Building Width (m)	94.54
Building Length (m)	96.46

SCREEN3 Model Output:

Maximum Modeled Unit Emission Rate 1-Hr Concentration ($\mu g/m^3$)	527.67

Air Toxics Maximum Modeled 1-Hr Concentration:

Maximum Benzene Hourly Emission Rate (lb/hr)	0.05
Benzene ($\mu g/m^3$)	3.09
Maximum Formaldehyde Hourly Emission Rate (lb/hr)	1.59E-03
Formaldehyde ($\mu g/m^3$)	0.11

Ohio EPA Air Toxic Pollutant Ambient Impact Analysis
PTIO Application
Cleanlites Recycling, Inc.
PN: 5082-18-001 by DJM/BRG 1/11/2019

OEPA MAGLC Calculations:

Benzene:

TWA (ppm)	0.5
Molecular Weight	78.11
TLV (mg/m^3)	1.60
MAGLC ($\mu g/m^3$)	38.03
Maximum Modeled 1-hr Ground Level Concentration ($\mu g/m^3$)	3.09
Percentage of MAGLC (%)	8.12%

Formaldehyde:

TWA (ppm)	0.1
Molecular Weight	30.03
TLV (mg/m^3)	0.12
MAGLC ($\mu g/m^3$)	2.92
Maximum Modeled 1-hr Ground Level Concentration ($\mu g/m^3$)	0.11
Percentage of MAGLC (%)	3.61%

Part B Permit Application - Subsection L
Technical Details for Deactivation Unit Operation and Pollution Control

SUBSECTION L

Technical Details for Deactivation Unit Operation and Pollution Control

1.0 Purpose

The purpose of this Subsection is to provide additional technical information as required for the review of this application.

1.1 Attachments are as follows.

Attachment 1 – ATF Permit Applications

Attachment 2 – ATF Permit

Attachment 3 – Air Pollution Control Permit Application

Attachment 4 – Air Pollution Control Permit

Part B Application - Subsection L
Attachment 1 - ATF Applications

OMB No. 1140-0070

U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

Application for Explosives License or Permit

Section A *(Must be completed by all applicants.) Please print all information in block letters.*

FOR ATF USE ONLY

1. Name of Applicant *(If partnership, include name of each partner)*

USA Lamp & Ballast Recycling, Inc

2. Trade Name or Business Name, if any

dba Cleanlites Recycling, Inc

3. Employer Identification Number *(EIN)* or Social Security Number *(SSN) (Voluntary-see Privacy Act Information)* 31-1400474

Attach 2" x 2" Photograph Here

(See Instruction 8)

4. Name of County in Which Business is Located

Fulton

5a. Premises Address *(No., Street, City, State, Zip Code)*

715 West Linfoot Street, Wauseon, OH 43567

5b. Mailing Address *(If different from address in Item 5a.)*

PO Box 381
Wauseon, OH 43567

NOTE: A completed FD-258 *(Fingerprint Identification Card)* must accompany this application. *(See Instruction 8)*

6. Location *(If no street address listed in Item 5a, provide directions and distance from nearest post office or city limits)*

715 West Linfoot Street
Wauseon, OH 43567

7. Telephone Number *(Include Area Code)*

Business (517) 676-0044

Residence (517) 204.7111 (Additional Phone Numbers Attached)

Emergency (517) 204-7111 (Additional Phone Numbers Attached)

Fax (517) 676-4449

E-Mail Address mikek@cleanlites.com -additional emails attached

8. Are you presently engaged in a business and/or operations for which a license or permit is required under 18 U.S.C., Chapter 40, Explosives? *(If yes, provide date business began.)* ☐ Yes/Date: _____ ☑ No

9. Is or will your business and/or operations be: *(Check appropriate box)*

☐ Sole Proprietor ☐ Partnership ☑ Corporation ☐ Limited Liability Company ☐ Other *(Specify)* _____

10. Method of Payment *(Check one)*

☑ Check *(Enclosed)* ☐ Cashier's Check or Money Order *(Enclosed)* ☐ Visa ☐ Mastercard ☐ American Express ☐ Discover ☐ Diners Club

Credit/Debit Card Number *(No dashes)*	Name as Printed on the Credit/Debit Card	Expiration Date *(Month & year)*

Credit/Debit Card Billing Address:

Address:

City: State: Zip Code:

Please Complete to Ensure Payment is Credited to the Correct Application:

I am Paying the Application Fee for the Following Person, Corporation, or Partnership:

Total Application Fees:

I Authorize ATF to Charge my Credit/Debit Card the Above Amount.

Signature of Cardholder

Date

Your credit/debit card will be charged the above stated amount upon receipt of your application. The charge will be reflected on your credit/debit card statement. In the event a license/permit is NOT issued, the above amount will be credited to the credit/debit card noted above.

ATF E-Form 5400.13/5400.16
Revised October 2018

Responsible Person(s) List

11. Provide information for each individual owner, partner, and all other responsible persons *(See Definition 3)* in the trade or business operations identified in section A, block 2. List all names used by each responsible person *(i.e., nicknames, maiden name, name from previous marriage, etc.) (If additional space is needed use a separate sheet.)*

Full Name *(If the individual is an alien, also provide his/her U.S.-issued alien number or admission number.)* a	Position at Business b	Social Security Number *(Voluntary - will help prevent misidentification)* c	Home Address and E-mail Address *(Include ZIP Code)* d	Telephone Numbers *(Home/Work)* e	Date of Birth *(Month/Day/Year) (XX/XX/XXXX)* f	Place of Birth g	Country/ Countries of Citizen-ship h	Sex i	Ethnicity j	Race *(Mark all that apply)* j
Michael T Kimmel	Sr. Vice President	468 04 8869	2650 Baseline Road Stockbridge, MI 49285 mikek@cleanlites.com	517.204.7111 mobile 517.676.0044 office	10/27/1967	Mosbach, Germany	US	M	Are you Hispanic or Latino? ☐ Yes ☑ No	☐ American Indian or Alaska Native ☐ Asian ☐ Black or African American ☐ Native Hawaiian or Other Pacific Islanders ☑ White
Benny James Coyt	EHS Manager	408 19 9430	1028 Pauley Court Berea, KY 40403 benny.coyt@cleanlites.com	513.441.3825 mobile 513.851.3500 office	12/17/1971	Jellico, TN	US	M	Are you Hispanic or Latino? ☐ Yes ☑ No	☐ American Indian or Alaska Native ☐ Asian ☐ Black or African American ☐ Native Hawaiian or Other Pacific Islanders ☑ White
Daniel D Kimmel	Business Development	475 25 7636	4374 Brogan Road PO Box 505 Stockbridge, MI 49285 daniel.k@cleanlites.com	517.214.0453 mobile 517.676.0044 office	09/29/1992	Minneapolis, MN	US	M	Are you Hispanic or Latino? ☐ Yes ☑ No	☐ American Indian or Alaska Native ☐ Asian ☐ Black or African American ☐ Native Hawaiian or Other Pacific Islanders ☑ White
									Are you Hispanic or Latino? ☐ Yes ☐ No	☐ American Indian or Alaska Native ☐ Asian ☐ Black or African American ☐ Native Hawaiian or Other Pacific Islanders ☐ White
									Are you Hispanic or Latino? ☐ Yes ☐ No	☐ American Indian or Alaska Native ☐ Asian ☐ Black or African American ☐ Native Hawaiian or Other Pacific Islanders ☐ White

12. Application is made for an explosives license or permit under 18 U.S.C., Chapter 40, as an: *(See definitions 5 through 9)*

Explosives License	Fee	Renewal Fee	Explosives Permit	Fee	Renewal Fee
Manufacturer *(Check the types of explosives you plan to manufacture:)* ☐ High Explosives ☐ Low Explosives ☐ Theatrical Flash Powders ☐ Fireworks ☐ Blasting Agents ☐ Other (Specify) _____	$200	$100	User of Explosives *(Check the types of explosives you plan to use:)* ☐ High Explosives ☐ Fireworks ☐ Blasting Agents ☐ Other (Specify) _____ ☑ Low Explosives	$100	$50
Importer *(Check the types of explosives you plan to import:)* ☐ High Explosives ☐ Fireworks ☐ Blasting Agents ☐ Other (Specify) _____ ☐ Low Explosives	$200	$100	Limited Permit (*Intrastate Only*) (*Check the types of explosives you plan to use*:) ☐ High Explosives ☐ Fireworks ☐ Blasting Agents ☐ Other (Specify) _____ ☐ Low Explosives	$25	$12
Dealer *(Check the types of explosives you plan to deal in:)* ☐ High Explosives ☐ Low Explosives ☐ Blasting Agents ☐ Fireworks ☐ Black Powder ☐ Other (Specify) _____	$200	$100			
			Total Fees	$100.00	

13. Is a State or local license or permit required for explosive business and/or operations? *(If yes, provide license/permit numbers; if applied for license/permit but not yet obtained, provide date of application.)* ☑ Yes/Numbers or Date Application in Process of being submitted ☐ No

14. Is the applicant or any person named in item 11: *(ALL questions must be answered by checking the "YES" or "NO" box.) (Give full details on a separate sheet for all "yes" answers in item 14.)*	Yes	No
a. A fugitive from justice?		✓
b. An unlawful user of, or addicted to, marijuana or any depressant, stimulant, or narcotic drug, or any other controlled substance?		✓
c. Under indictment or information in any court for a felony, or any crime, for which the judge could imprison that person for more than one year? *(An information is a formal accusation of a crime by a prosecutor.) (See Definition 1.)*		✓
d. An alien in the United States? *(If "yes," attach an explanatory statement showing that the person is a lawful permanent resident or a lawful nonimmigrant or refugee/asylee.) (See Definition 2 and Exception 2.)* ☐ **Statement Attached.** If the individual is an alien, provide the U.S.-issued alien number or admission number in item 11.		✓
e. Presently appealing a conviction of a crime punishable by imprisonment for a term exceeding one year? *(If "yes," attach an explanatory statement showing date of conviction, court in which convicted, and court in which appeal is pending.)* ☐ **Statement Attached.**		✓

15. Has the applicant or any person named in item 11 EVER: *(Give full details on a separate sheet for all "yes" answers in item 15.)*	Yes	No
a. Been convicted in any court of a **felony**, or any other crime, for which the judge could have imprisoned that person for more than one year, even if he or she received a shorter sentence, including probation? *(See Definition 1 and Exception 1.)*		✓
b. Been adjudicated mentally defective *(which includes having been adjudicated incompetent to manage his or her own affairs)* or been committed to a mental institution?		✓
c. Been discharged from the Armed Forces under **dishonorable** conditions?		✓
d. **Renounced** his or her United States citizenship?		✓

Section B *(Must be completed)*

16. Hours of Operation and/or Availability of Business Activity (Please provide at least one hour in which you may be contacted by ATF Personnel.)

Time	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Open	Closed	9:00am	9:00am	9:00am	9:00am	9:00am	Closed
Close	Closed	4:00pm	4:00pm	4:00pm	4:00pm	4:00pm	Closed

17. Applicant's Business and/or Operation is Located in:

☑ A Commercial Building ☐ A Residence ☐ Other *(Specify)* _____

18. Applicant's Business and/or Operations Premises are:

☑ Owned ☐ A Leased/Rented* ☐ Other *(Specify)*

19. Does User Permit Applicant Intend to Transport Explosive Materials in Interstate or Foreign Commerce? *(If "yes," state where)*

☐ N/A ☑ No ☐ Yes

20. Does User Permit Applicant Intend to Purchase Explosive Materials in Interstate or Foreign Commerce? *(If "yes," state where)*

☐ N/A ☑ No ☐ Yes

21. Do you Intend to Deal in Black Powder? Do You Have a Federal Firearms License? *(If "yes," provide the Federal firearms license number)*

☑ No ☐ Yes Federal Firearms License #: No

Storage Facility Data

Section 842(j), 18 U.S.C., provides "It shall be unlawful for any person to store any explosive material in a manner not in conformity with regulations promulgated by the Attorney General." Before applying for a license or permit, the applicant must read and be familiar with the requirements as set forth in 27 CFR, Part 555, Subpart K - STORAGE. **An application for a license will be denied if upon an investigation it is found that storage facilities are inadequate.**

22a. All of the applicant's storage facilities listed on the attached Explosives Storage Magazine Description Worksheet(s) and meet the minimum requirements as set forth in 27 CFR, Part 555, Subpart K - Storage. If "no" *i.e., storage facilities do not meet minimum requirements)* explain on separate sheet. *(See Instruction 10.)*

22b. Please indicate the total number of explosives storage magazine(s). 4

22c. If the applicant has no storage facilities, provide contingency plan for unexpected surplus explosive materials by completing Explosives Storage Magazine Description Worksheet Item J. *(See Instruction 10.)*

Section C - Certification *(Must be completed by all applicants)*

23. Under the penalties imposed by 18 U.S.C. 844, I certify that the answers are true, correct, and complete. I also certify that I am familiar with all published State laws and local ordinances relating to explosive materials for the location in which I intend to do business. *In addition*, if the application is for a Limited Permit, I certify that I will not receive explosive materials on more than 6 separate occasions during the 12-month period for which my limited permit is valid.

Applicant's Signature	Title	Date
Michael T Kimmel	Michael T Kimmel, Senior Vice President	3/08/2019

For Bureau of Alcohol, Tobacco, Firearms, and Explosives Use Only

24. Application is	Reason for Disapproval/Termination
☐ Approved ☐ Withdrawn* ☐ Disapproved* * *(Fee will be refunded)*	

Signature of Licensing Official	Date

ATF E-Form 5400.13/5400.16
Revised October 2018

Explosives Storage Magazine Description Worksheet
(Submit one for each magazine; you may photocopy for additional magazines)

For ATF Use Only

Global Positioning System (GPS) Coordinates

Applicant name: USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc

Magazine ID no: Container 1

State/local explosives magazine certificate number, if any: N/A

Storage magazine address: 715 West Linfoot Street Wauseon, OH 43567

A. Type of magazine *(e.g., permanent, mobile/portable, indoor/outdoor, building, igloo, tunnel, dugout, box, trailer, semitrailer, or other mobile magazine)*:
Overseas Container

ATF Type: *(Check one)* ☐ I ☐ II ☐ III ☐ IV ☑ V

B. Location of magazine and distance from licensed place of business and other magazine: 4 Magazines, side by side, inside block & mortar building

C. Distance to nearest storage magazine, regardless of ownership: Unknown

D. Describe terrain features, roads, structures, buildings, utilities, etc., that could be damaged if the contents of the magazine exploded: See Attachments A & B
Attachment A = Aerial Photo
Attachment B = Plant Layout

E. Distance(s) between the magazine and the feature(s):
Indicate if magazine is: ☐ Barricaded ☑ Unbarricaded

Show distance in feet to: Closest highway: 1.2 miles Closest inhabited bldg: Inside inhabited bldg

Closest passenger railway: .85 mile

F. Materials, including thicknesses, used in construction of magazine:
Roof: 14 Gauge Steel Top: 14 Gauge Steel Walls: 14 Gauge Steel Bottom 3/4 inch wood with 14 Gauge Steel
Doors: 14 Gauge Steel Floor: 3/4 inch wood with 14 Gauge Steel

G.
1. Security, physical safeguards, safety equipment, and anti-theft measures: Padlocks, Security System Cameras, Alarm System Inside Building

2. Locks *(Check all that apply)*: Three-point Lock ___ Mortise Locks ___ Padlocks ✓

3. If Padlocks: Shackle Diameter: 3/8 in No. of Tumblers: 5 Steel Hoods: Yes ___ No ✓ Case-hardened: Yes ✓ No ___

H. Dimensions and capacity of magazine:
Capacity *(in pounds or number of detonators)*: 70,000 lbs Height: 9 feet, 6 inch Length: 40 feet Width: 8 feet

I. Explosives to be stored: Quantity or Weight 70,000 lbs

Class: High ___ Low X Blasting Agents ___ Detonators ___

J.
1. Magazine is *(Check one)*: ☑ Owned ☐ Borrowed ☐ Leased ☐ Rented ☐ Contingency Plan

2. Owner of magazine if borrowed, leased, rented, or on contingency: USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc

3. Address and phone number of owner: 715 West Linfoot Street, Wauseon, OH 43567 | 517 676.0044

K. Names and telephone numbers of persons who can open magazine for inspection:
See Responsible Person(s) List - Question 7

L. Special conditions, such as difficulty accessing in winter, etc.: None

M. A plat plan must be furnished, not necessarily to scale, which will indicate, at a minimum, (1) all buildings on the premises, and (2) all magazines identified, with distances between the magazines, as well as the distances between magazines and inhabited buildings, public highways, and passenger railways.

Prepared by: Michael T Kimmel, Senior VP *(Name and Title)* Date: 3.08.2019

ATF E-Form 5400.13/5400.16
Revised October 2018

ATTACHMENT A - Aerial Photo

Explosives Storage Magazine Worksheet

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

ERS
ENVIRONMENTAL RECORD SEARCH

Historical Aerial Photo
2015

715 West Linfoot Street
Wauseon, OH

N
W E
S

Target Site: 41.556909, -84.155509 Job #: 2104692106

ATTACHMENT B - Plant Layout

Explosives Storage Magazine Worksheet

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

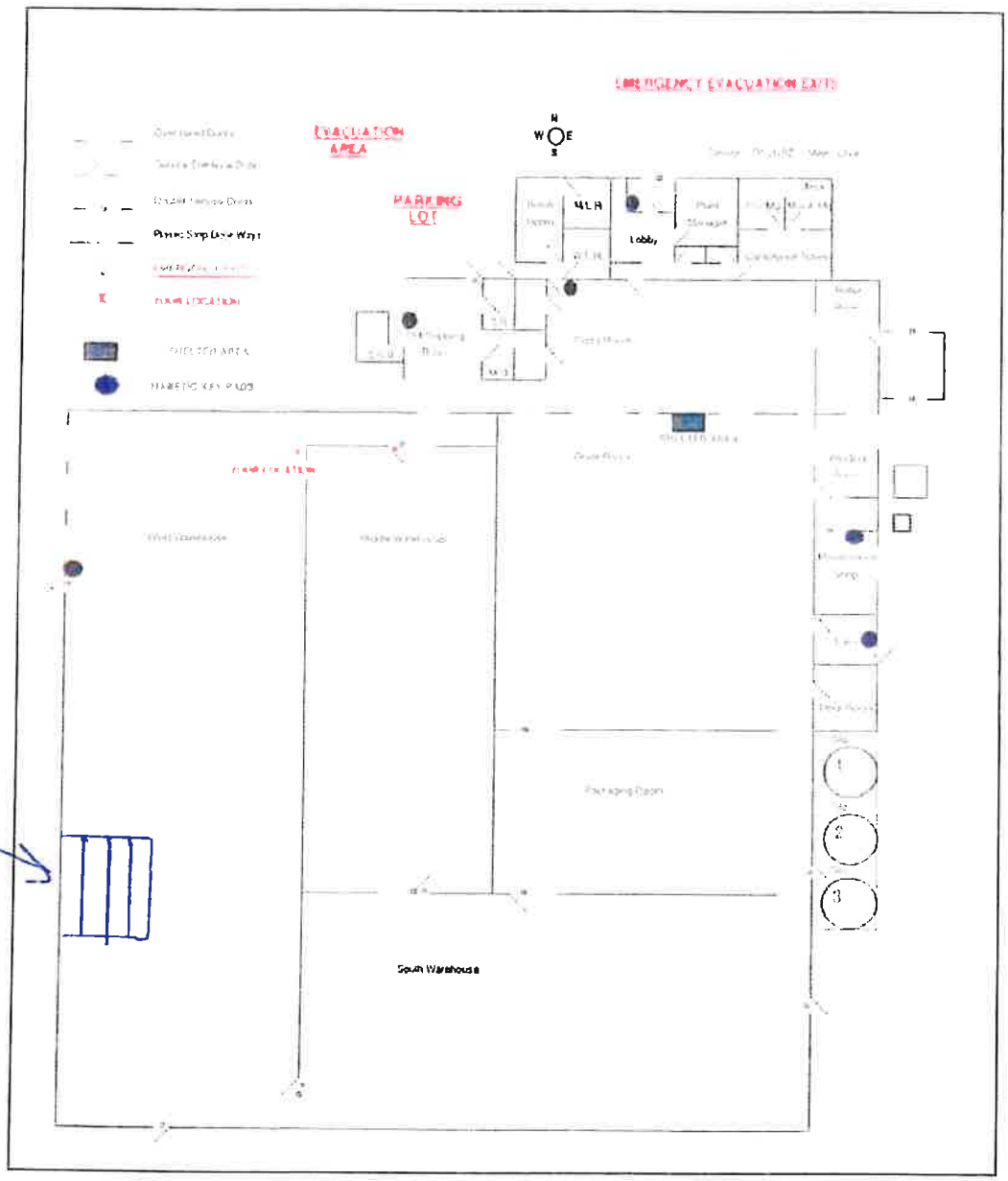
CUSHMAN & WAKEFIELD. | SIGNATURE ASSOCIATES
THE TEAM No Signature No Results
INDEPENDENTLY OWNED AND OPERATED

Commercial Real Estate
Brokers/Advisors
Property Management
Consultants

Four SeaGate
Suite 608
Toledo, Ohio 43604

INDUSTRIAL BUILDING FOR SALE

715 LINFOOT STREET
WAUSEON, OHIO 43567



For more information contact 419-249-7070
Robert P. Mack, CCIM, SIOR
419-249-6301 Office or 419-466-6225 Cell
rpmack@signatureassociates.com

www.signatureassociates.com

Explosives Storage Magazine Description Worksheet
(Submit one for each magazine; you may photocopy for additional magazines)

For ATF Use Only

Global Positioning System (GPS) Coordinates

Applicant name: USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc

Magazine ID no: Container 2

State/local explosives magazine certificate number, if any: N/A

Storage magazine address: 715 West Linfoot Street Wauseon, OH 43567

A Type of magazine *(e.g., permanent, mobile/portable, indoor/outdoor, building, igloo, tunnel, dugout, box, trailer, semitrailer, or other mobile magazine).*

Overseas Container

ATF Type: *(Check one)* ☐ I ☐ II ☐ III ☐ IV ☑ V

B Location of magazine and distance from licensed place of business and other magazine: 4 Magazines, side by side, inside block & mortar building

C Distance to nearest storage magazine, regardless of ownership: Unknown

D Describe terrain features, roads, structures, buildings, utilities, etc., that could be damaged if the contents of the magazine exploded: See Attachments A & B

Attachment A = Aerial Photo

Attachment B = Plant Layout

E Distance(s) between the magazine and the feature(s):

Indicate if magazine is: ☐ Barricaded ☑ Unbarricaded

Show distance in feet to: Closest highway: 1.2 miles Closest inhabited bldg: Inside inhabited bldg

Closest passenger railway: .85 mile

F Materials, including thicknesses, used in construction of magazine:

Roof: 14 Gauge Steel Top: 14 Gauge Steel Walls: 14 Gauge Steel Bottom: 3/4 inch wood with 14 Gauge Steel

Doors: 14 Gauge Steel Floor: 3/4 inch wood with 14 Gauge Steel

G

1 Security, physical safeguards, safety equipment, and anti-theft measures: Padlocks, Security System Cameras, Alarm System Inside Building

2 Locks *(Check all that apply):* Three-point Lock ___ Mortise Locks ___ Padlocks ✓

3 If Padlocks: Shackle Diameter: 3/8 in No. of Tumblers: 5 Steel Hoods: Yes ___ No ✓ Case-hardened: Yes ✓ No ___

H Dimensions and capacity of magazine:

Capacity *(in pounds or number of detonators):* 70,000 lbs Height: 9 feet, 6 inch Length: 40 feet Width: 8 feet

I Explosives to be stored: Quantity or Weight 70,000 lbs

Class: High ___ Low X Blasting Agents ___ Detonators ___

J

1 Magazine is *(Check one)*: ☑ Owned ☐ Borrowed ☐ Leased ☐ Rented ☐ Contingency Plan

2 Owner of magazine if borrowed, leased, rented, or on contingency: USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc

3 Address and phone number of owner: 715 West Linfoot Street, Wauseon, OH 43567 | 517.676.0044

K Names and telephone numbers of persons who can open magazine for inspection:

See Responsible Person(s) List - Question 7

L Special conditions, such as difficulty accessing in winter, etc.: None

M A plat plan must be furnished, not necessarily to scale, which will indicate, at a minimum, (1) all buildings on the premises, and (2) all magazines identified, with distances between the magazines, as well as the distances between magazines and inhabited buildings, public highways, and passenger railways.

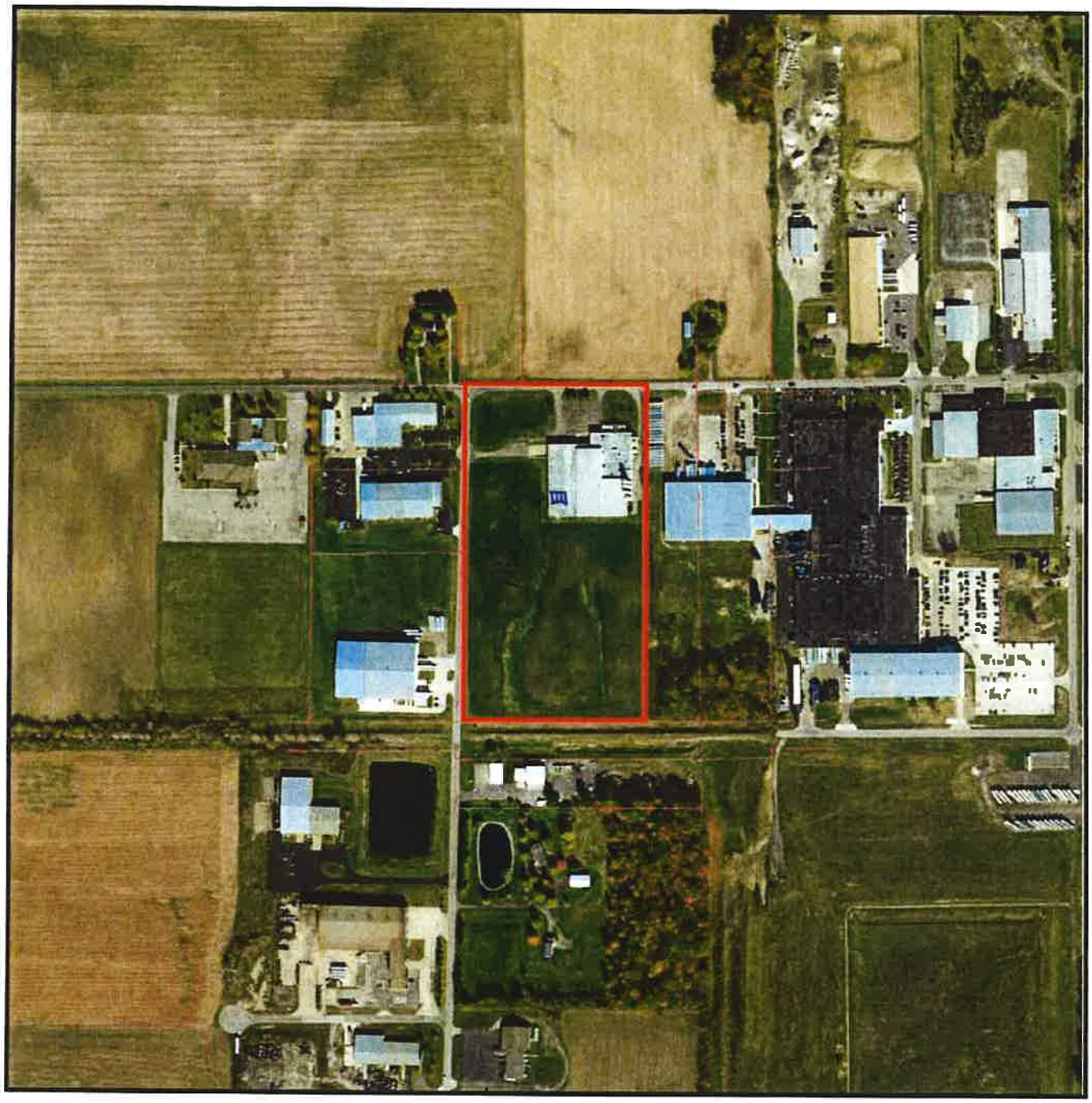
Prepared by: Michael T Kimmel, Senior VP *(Name and Title)* Date: 3.08.2019

ATF E-Form 5400.13/5400.16
Revised October 2018

ATTACHMENT A - Aerial Photo

Explosives Storage Magazine Worksheet

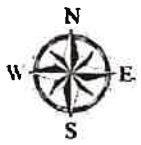
USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc



ERS
ENVIRONMENTAL RECORD SEARCH

Historical Aerial Photo
2015

715 West Linfoot Street
Wauseon, OH



Target Site: 41.556909, -84.155509 Job #: 2104692106

ATTACHMENT B - Plant Layout

Explosives Storage Magazine Worksheet

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

CUSHMAN & WAKEFIELD. | SIGNATURE ASSOCIATES
THE TEAM No Signature No Results
INDEPENDENTLY OWNED AND OPERATED

Commercial Real Estate
Brokers/Advisors
Property Management
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Four SeaGate
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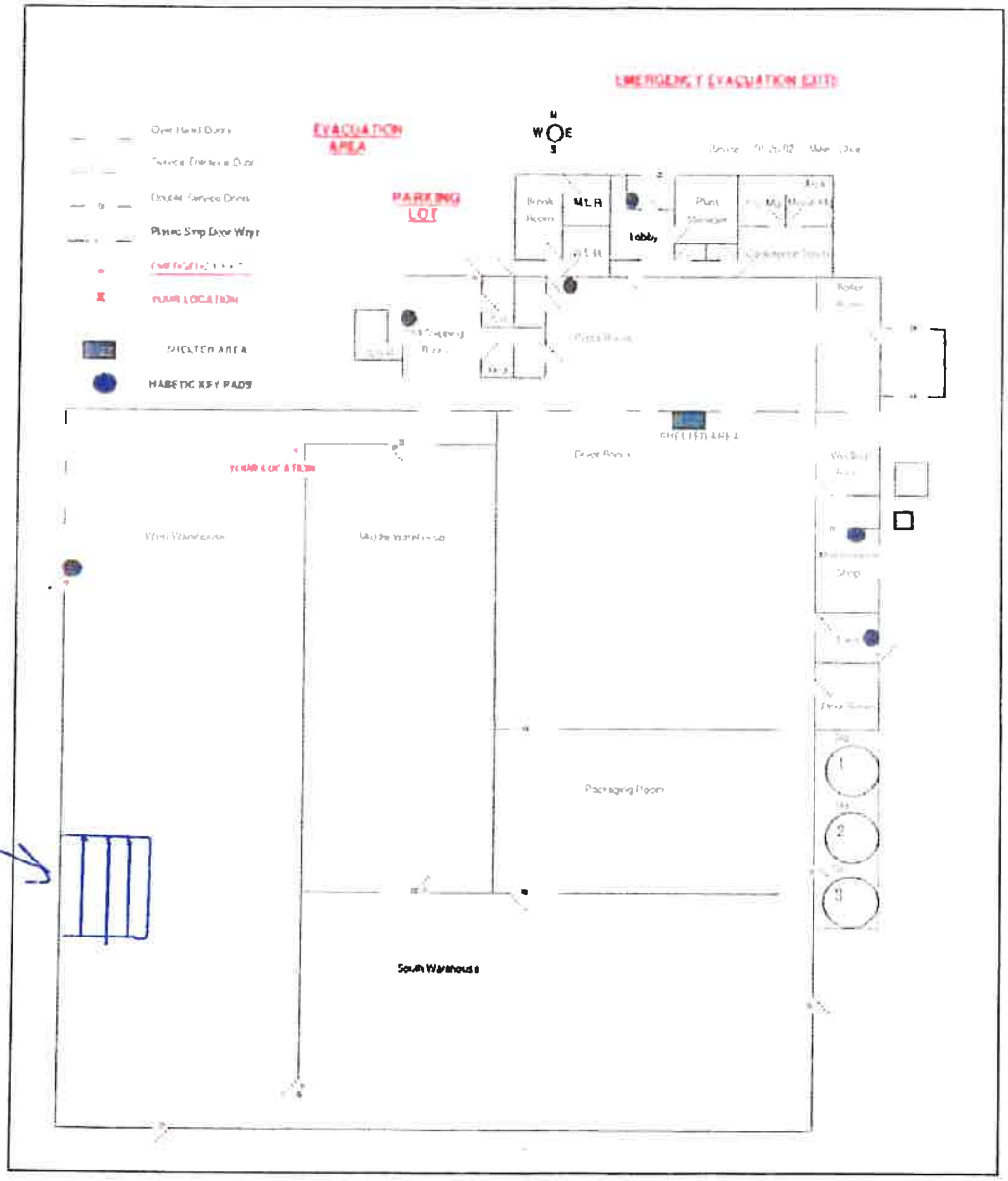


Magazines

For more information contact 419-249-7070
Robert P. Mack, CCIM, SIOR
419-249-6301 Office or 419-466-6225 Cell
rpmack@signatureassociates.com

www.signatureassociates.com

Explosives Storage Magazine Description Worksheet
(Submit one for each magazine; you may photocopy for additional magazines)

For ATF Use Only

Global Positioning System (GPS) Coordinates

Applicant name: USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc

Magazine ID no: Container 3

State/local explosives magazine certificate number, if any: N/A

Storage magazine address: 715 West Linfoot Street Wauseon, OH 43567

A Type of magazine *(e.g., permanent, mobile/portable, indoor/outdoor, building, igloo, tunnel, dugout, box, trailer, semitrailer, or other mobile magazine).*

Overseas Container

ATF Type: *(Check one)* ☐ I ☐ II ☐ III ☐ IV ☑ V

B Location of magazine and distance from licensed place of business and other magazine: 4 Magazines, side by side, inside block & mortar building

C Distance to nearest storage magazine, regardless of ownership: Unknown

D Describe terrain features, roads, structures, buildings, utilities, etc., that could be damaged if the contents of the magazine exploded: See Attachments A & B

Attachment A = Aerial Photo

Attachment B = Plant Layout

E Distance(s) between the magazine and the feature(s):

Indicate if magazine is: ☐ Barricaded ☑ Unbarricaded

Show distance in feet to: Closest highway: 1.2 miles Closest inhabited bldg: Inside inhabited bldg

Closest passenger railway: .85 mile

F Materials, including thicknesses, used in construction of magazine.

Roof: 14 Gauge Steel Top: 14 Gauge Steel Walls: 14 Gauge Steel Bottom: 3/4 inch wood with 14 Gauge Steel

Doors: 14 Gauge Steel Floor: 3/4 inch wood with 14 Gauge Steel

G

1 Security, physical safeguards, safety equipment, and anti-theft measures: Padlocks, Security System Cameras, Alarm System Inside Building

2. Locks *(Check all that apply):* Three-point Lock ___ Mortise Locks ___ Padlocks ✓

3. If Padlocks: Shackle Diameter: 3/8 in No. of Tumblers: 5 Steel Hoods: Yes ___ No ✓ Case-hardened: Yes ✓ No ___

H Dimensions and capacity of magazine:

Capacity *(in pounds or number of detonators):* 70,000 lbs Height: 9 feet, 6 inch Length: 40 feet Width: 8 feet

I Explosives to be stored: Quantity or Weight 70,000 lbs

Class: High ___ Low X Blasting Agents ___ Detonators ___

J

1. Magazine is *(Check one)*: ☑ Owned ☐ Borrowed ☐ Leased ☐ Rented ☐ Contingency Plan

2 Owner of magazine if borrowed, leased, rented, or on contingency: USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc

3. Address and phone number of owner: 715 West Linfoot Street, Wauseon, OH 43567 | 517.676.0044

K Names and telephone numbers of persons who can open magazine for inspection:

See Responsible Person(s) List - Question 7

L Special conditions, such as difficulty accessing in winter, etc.: None

M A plat plan must be furnished, not necessarily to scale, which will indicate, at a minimum, (1) all buildings on the premises, and (2) all magazines identified, with distances between the magazines, as well as the distances between magazines and inhabited buildings, public highways, and passenger railways.

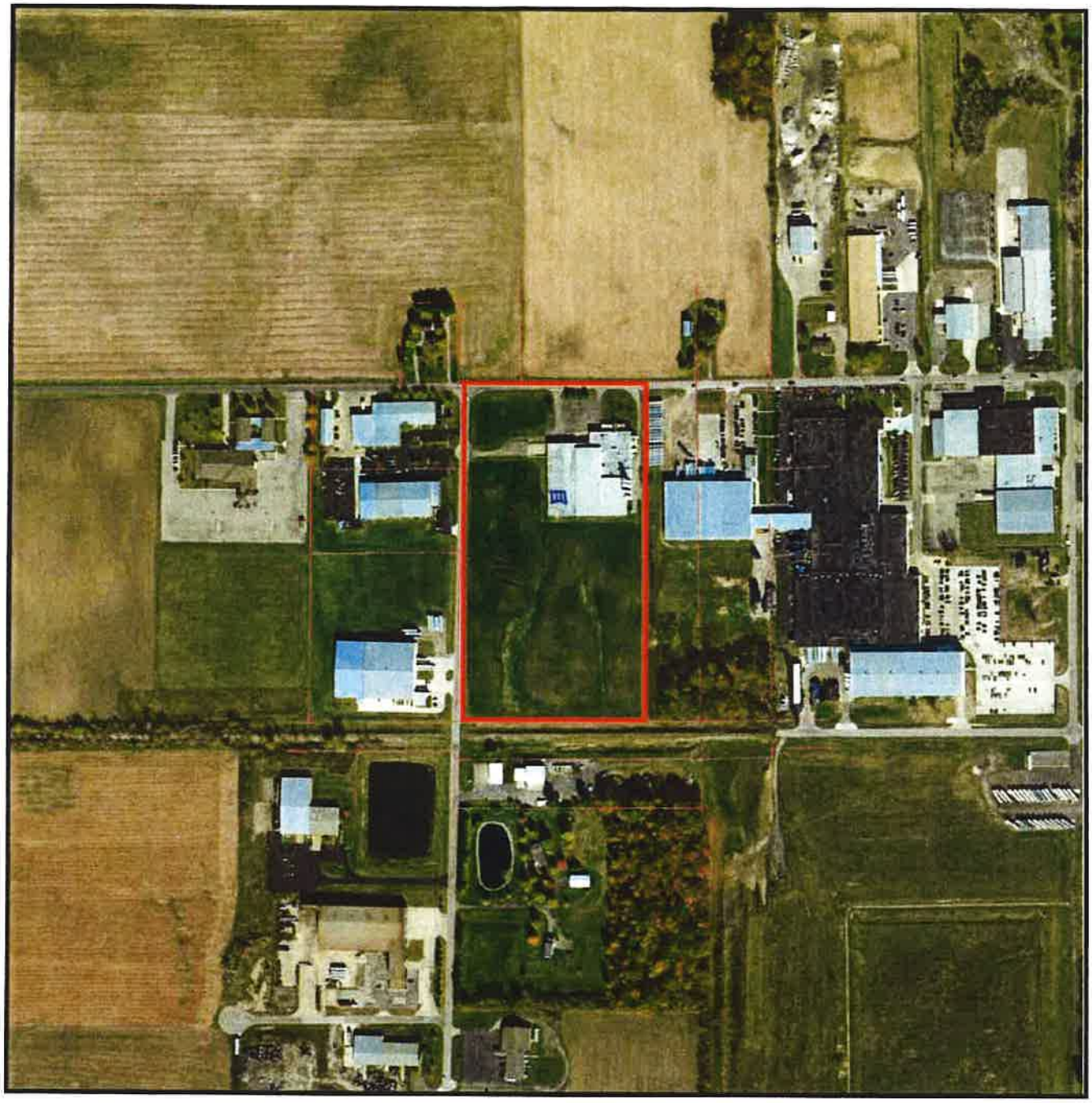
Prepared by: Michael T Kimmel, Senior VP *(Name and Title)* Date: 3.08.2019

ATF E-Form 5400.13/5400.16
Revised October 2018

ATTACHMENT A - Aerial Photo

Explosives Storage Magazine Worksheet

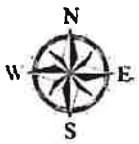
USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc



ERS
ENVIRONMENTAL RECORD SEARCH

Historical Aerial Photo
2015

715 West Linfoot Street
Wauseon, OH



Target Site: 41.556909, -84.155509 Job #: 2104692106

ATTACHMENT B - Plant Layout

Explosives Storage Magazine Worksheet

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

CUSHMAN & WAKEFIELD. | SIGNATURE ASSOCIATES
THE TEAM No Signature No Results
INDEPENDENTLY OWNED AND OPERATED

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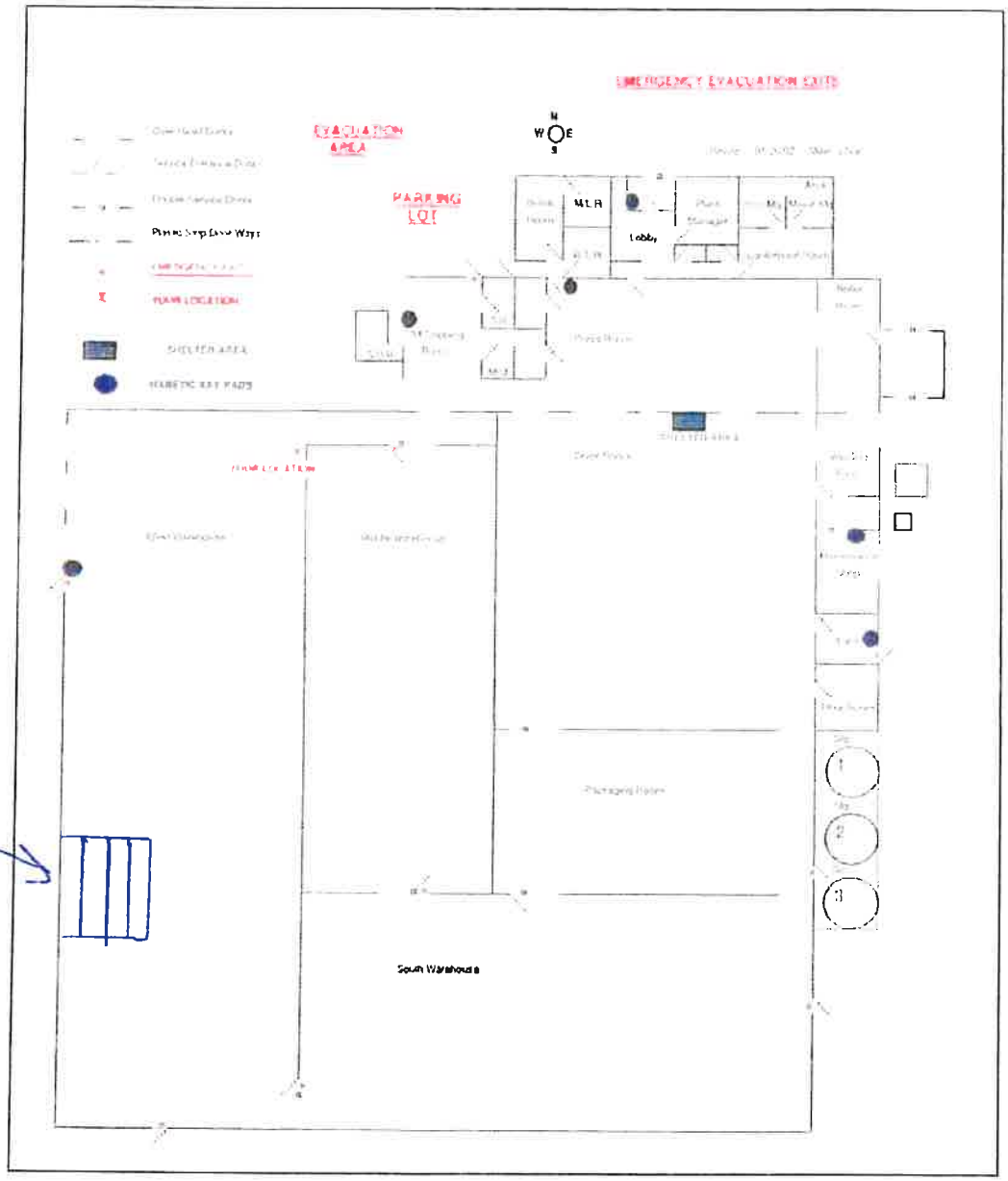
WAUSEON, OHIO 43567



For more information contact 419-249-7070
Robert P. Mack, CCIM, SIOR
419-249-6301 Office or 419-466-6225 Cell
rpmack@signatureassociates.com

www.signatureassociates.com

Explosives Storage Magazine Description Worksheet
(Submit one for each magazine; you may photocopy for additional magazines)

For ATF Use Only

Global Positioning System (GPS) Coordinates

Applicant name: USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc

Magazine ID no: Container 4

State/local explosives magazine certificate number, if any: N/A

Storage magazine address: 715 West Linfoot Street Wauseon, OH 43567

A Type of magazine *(e.g., permanent, mobile/portable, indoor/outdoor, building, igloo, tunnel, dugout, box, trailer, semitrailer, or other mobile magazine).*

Overseas Container

ATF Type: *(Check one)* ☐ I ☐ II ☐ III ☐ IV ☑ V

B Location of magazine and distance from licensed place of business and other magazine: 4 Magazines, side by side, inside block & mortar building

C Distance to nearest storage magazine, regardless of ownership: Unknown

D Describe terrain features, roads, structures, buildings, utilities, etc., that could be damaged if the contents of the magazine exploded: See Attachments A & B

Attachment A = Aerial Photo

Attachment B = Plant Layout

E Distance(s) between the magazine and the feature(s):

Indicate if magazine is: ☐ Barricaded ☑ Unbarricaded

Show distance in feet to: Closest highway: 1.2 miles Closest inhabited bldg: Inside inhabited bldg

Closest passenger railway: .85 mile

F Materials, including thicknesses, used in construction of magazine.

Roof: 14 Gauge Steel Top: 14 Gauge Steel Walls: 14 Gauge Steel Bottom 3/4 inch wood with 14 Gauge Steel

Doors: 14 Gauge Steel Floor 3/4 inch wood with 14 Gauge Steel

G

1 Security, physical safeguards, safety equipment, and anti-theft measures: Padlocks, Security System Cameras, Alarm System Inside Building

2. Locks *(Check all that apply):* Three-point Lock ___ Mortise Locks ___ Padlocks ✓

3. If Padlocks: Shackle Diameter: 3/8 in No. of Tumblers: 5 Steel Hoods: Yes ___ No ✓ Case-hardened: Yes ✓ No ___

H Dimensions and capacity of magazine:

Capacity *(in pounds or number of detonators):* 70,000 lbs Height: 9 feet, 6 inch Length: 40 feet Width: 8 feet

I Explosives to be stored: Quantity or Weight 70,000 lbs

Class: High ___ Low X Blasting Agents ___ Detonators ___

J

1 Magazine is *(Check one)*: ☑ Owned ☐ Borrowed ☐ Leased ☐ Rented ☐ Contingency Plan

2 Owner of magazine if borrowed, leased, rented, or on contingency USA Lamp & Ballast Recycling, Inc dba Cleanlites Recycling, Inc

3. Address and phone number of owner: 715 West Linfoot Street, Wauseon, OH 43567 | 517 676.0044

K. Names and telephone numbers of persons who can open magazine for inspection:

See Responsible Person(s) List - Question 7

L. Special conditions, such as difficulty accessing in winter, etc.: None

M. A plat plan must be furnished, not necessarily to scale, which will indicate, at a minimum, (1) all buildings on the premises, and (2) all magazines identified, with distances between the magazines, as well as the distances between magazines and inhabited buildings, public highways, and passenger railways.

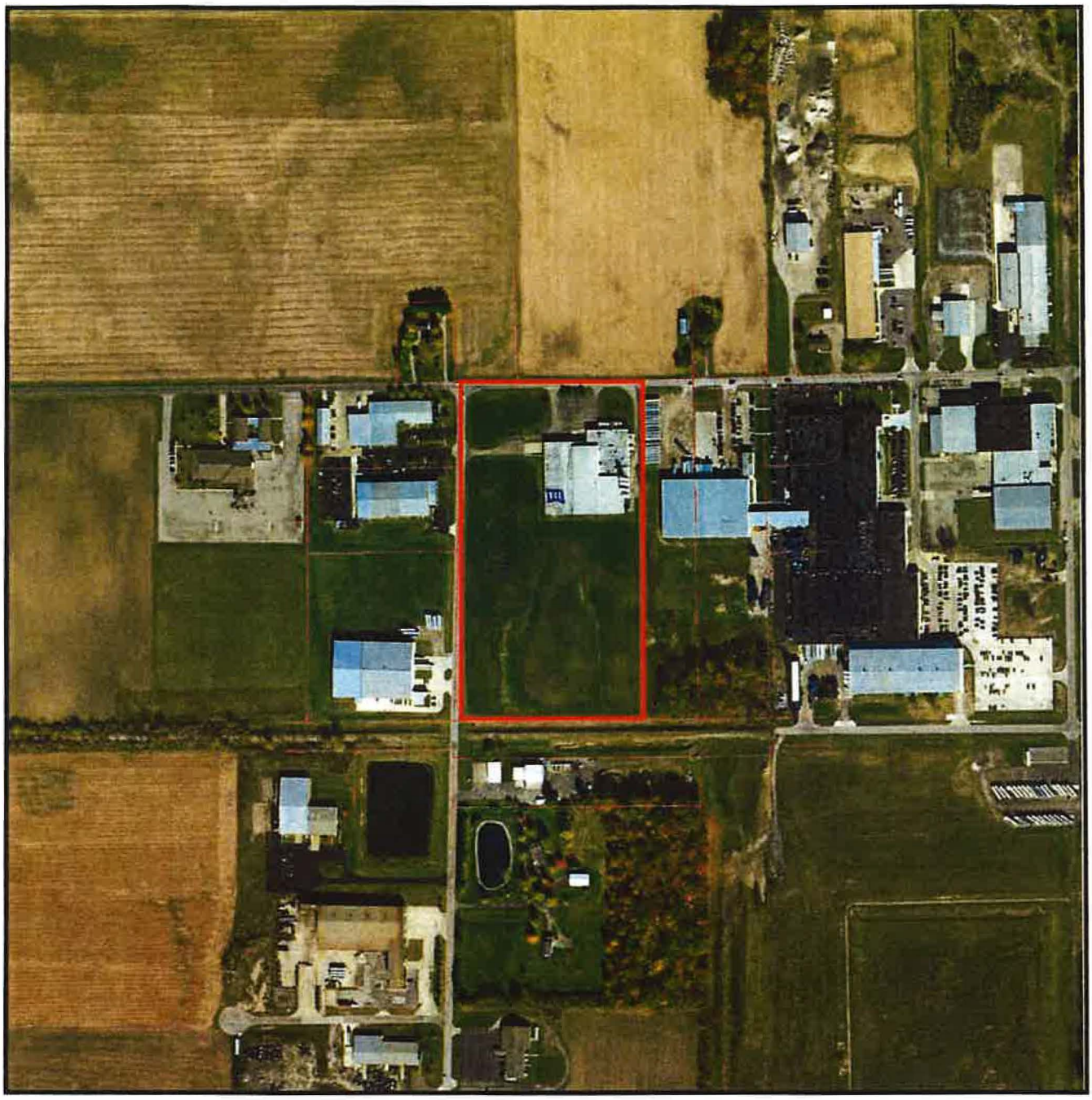
Prepared by: Michael T Kimmel, Senior VP *(Name and Title)* Date: 3.08.2019

ATF E-Form 5400.13/5400.16
Revised October 2018

ATTACHMENT A - Aerial Photo

Explosives Storage Magazine Worksheet

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



ERS
ENVIRONMENTAL RECORD SEARCH

Historical Aerial Photo
2015

715 West Linfoot Street
Wauseon, OH

Target Site: 41.556909, -84.155509 Job #: 2104692106

ATTACHMENT B - Plant Layout

Explosives Storage Magazine Worksheet

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

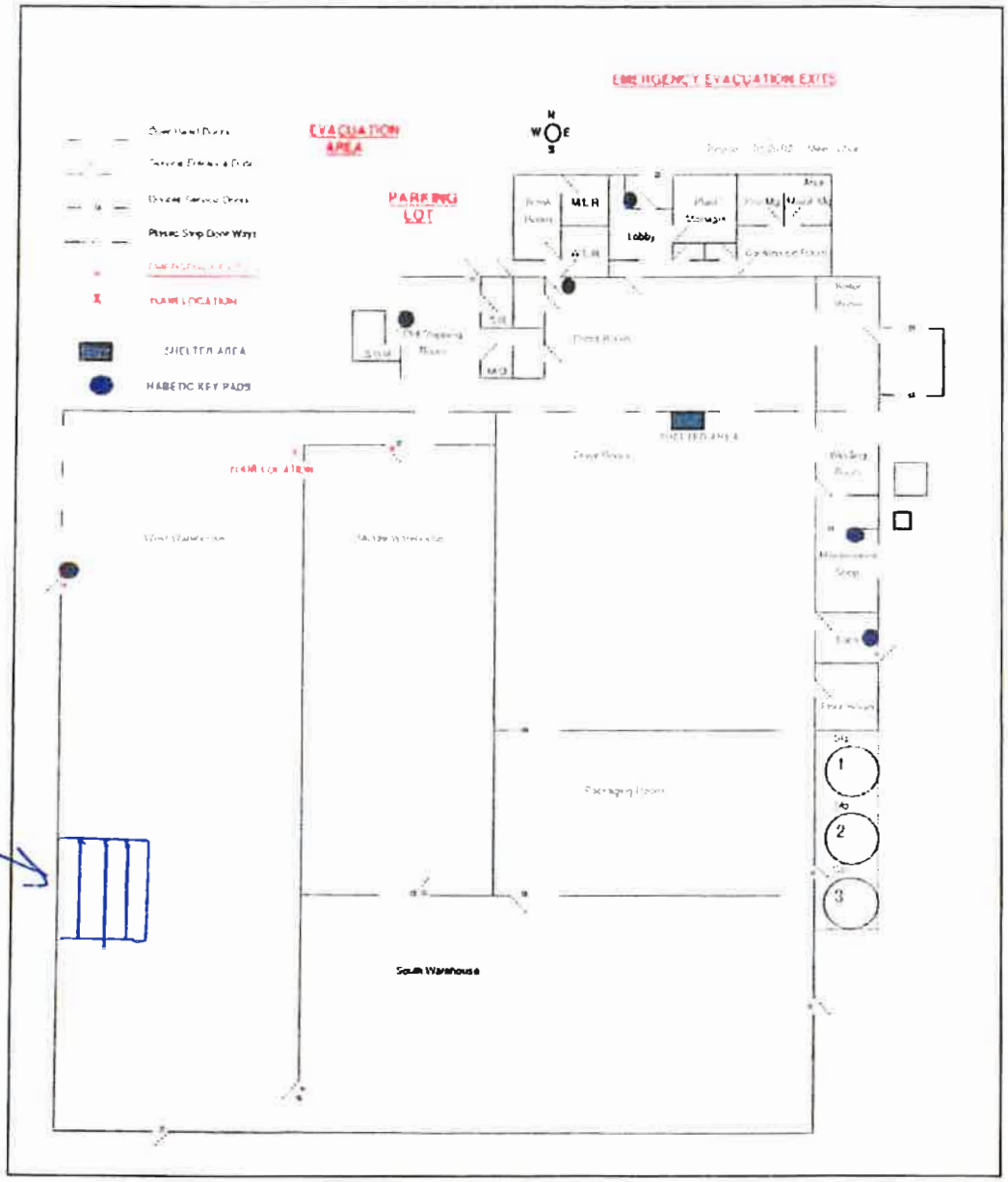
CUSHMAN & WAKEFIELD. | SIGNATURE ASSOCIATES
THE TEAM No Signature No Results
INDEPENDENTLY OWNED AND OPERATED

Commercial Real Estate
Brokers/Advisors
Property Management
Consultants

Four SeaGate
Suite 608
Toledo, Ohio 43604

INDUSTRIAL BUILDING FOR SALE

715 LINFOOT STREET
WAUSEON, OHIO 43567



For more information contact 419-249-7070
Robert P. Mack, CCIM, SIOR
419-249-6301 Office or 419-466-6225 Cell
rpmack@signatureassociates.com

www.signatureassociates.com

Section A

Question 7: **Telephone Number *(Include Area Code)***

Business: 517.676.0044

Residence: 517.204.7111
513.441.3825
517.214.0453

Emergency: 517.204.7111
513.441.3825
517.214.0453

E-Mail: mikek@cleanlites.com
benny.coyt@cleanlites.com
daniel.k@cleanlites.com

FEL No.: **4-OH-051-34-2F-01199** FEL Name: **USA LAMP & BALLAST RECYCLING INC**

FEL Type: 34-USER OF EXPLOSIVES Premises Address: **715 WEST LINFOOT STREET**
WAUSEON, OH 43567-

Expiration Date: **June 1, 2022**

C. Answer questions 1 - 4 by checking "yes" or "no" in the boxes to the right of the questions. Check Yes or No

Intrastate Purchase of Explosives Coupon(s) (IPEC) ATF F 5400.30. ***(This question to be completed by type 60, limited permittee ONLY)*** 1. I have examined the remaining purchase coupons, and I have _____ purchase coupons remaining. I have used _____ purchase coupons. (Q # 1. to be completed by type 60, limited permittee ONLY) N/A	☐ ☐
Notice of Clearance 2. I have reviewed my latest Notice of Clearance (NOC), dated 3/21/22, and ALL the listed responsible persons (RPs) and employee possessors (EPs) are correct - no changes or updates are needed. If the "NOC" is NOT accurate and needs to be updated, please retrun a copy of the latest NOC with this renewal application and include a statement showing the nature of the inaccurate or incomplete information. All CURRENT and NEW employee possessors MUST complete ATF Form 5400.28, Employee Possessor Questionnaire. You must complete ATF 5400.28 Employee Possessor Questionnaire, for ALL EPs that are active on your FEL, both CURRENT and NEW EPs. If you need to ADD RPs, fingerprints and photos are required for EACH additional RP, along with their identifying information. Heaven Kaercher application including finger prints & photos submitted 3.17.22. Haven't received NOC. Most recent NOC attached.	☐ ☒
Storage Facility/Magazine Data (18 U.S.C. Section 842(j) provides: "It shall be unlawful for any person to store any explosive material in a manner not in conformity with regulations promulgated by the Attorney General." An application for a license/permit can be denied if upon investigation it is found that any storage facilities/magazines do not comply with federal regulations.)	
3. Do you have storage facilities/magazines to store your explosive materials? If NO, attach an explanatory statement providing a contingency plan for the storage of unexpected surplus explosive materials. ☐ Statement attached.	☒ ☐
4. Have your storage facilities been moved since submission of your last plat plan?	☐ ☒

5. Please indicate the total number and type of explosives storage magazine(s) you have and in which State(s) they are located: *(Attach additional sheets if necessary.)*

State	Type 1 permanent	Type 2 mobile/ portable	Type 3 portable/ temporary	Type 4 low explosives	Type 5 blasting agents
OH				4	

USA LAMP & BALLAST RECYCLING INC
CLEANLITES RECYCLING
PO BOX 381
WAUSEON, OH 43567-

MAILING ADDRESS

D. The following questions apply to YOU and to any other person who has the power to direct the management and policies of your explosives activities. Answer questions 6 - 14 by checkng "yes" or "no" in the boxes to the right of the questions. Check Yes or No

6. Have you ever been convicted in any court of a felony or any other crime for which the judge could have imprisoned you for more than one year, even if you received a shorter sentence, including probation?	☐ ☒
7. Are you charged by information or under indictment in any court for a felony or any other crime for which the judge could imprison you for more than one year? An "information" is a formal accusation of a crime made by a prosecuting attorney.	☐ ☒
8. Are you presently appealing a conviction of a crime punishable by imprisonment for a term exceeding one year?	☐ ☒
9. Are you a **fugitive** from justice?	☐ ☒
10. Are you an unlawful user of or addicted to marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance?	☐ ☒
11. Have you ever been adjudicated mentally defective, which includes having been adjudicated incompetent to manage your own affairs, or been committed to any mental institution?	☐ ☒
12. Have you been discharged from the Armed Forces under **dishonorable** conditions?	☐ ☒
13. Are you an alien **illegally or unlawfully** in the United States?	☐ ☒
14. Have you ever renounced your United States citizenship?	☐ ☒

Under penalties imposed by 18 U.S.C. 844, I certify that the statements contained in this renewal application, and any attached statements, are true and correct to the best of my knowledge and belief.

Authorized Signature: Michael T Kimmel Title: Senior VP Date: 5/26/2022

PRINTED NAME of signature above: Michael T Kimmel Telephone no.: 517.676.0044

PAPERWORK REDUCTION ACT NOTICE

This request is in accordance with the Paperwork Reduction Act of 1995. The information collection is used to determine location and extent of operations, and to determine whether the operations will be in conformity with Federal laws and regulations. The information requested is required to retain a benefit and is mandatory by statute (18 U.S.C. 844).
The average burden associated with this collection is 25 minutes per respondent or recordkeeper, depending on individual circumstances. Comments concerning the accuracy of this burden estimate and suggestions for reducing this burden should be directed to Reports Management Officer, Resource Management Staff, Contracts and Forms Office, Bureau of Alcohol, Tobacco, Firearms and Explosives, 99 New York Ave, N.E., Washington, DC 20226.
An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid U.S. Office of Management and Budget control number.

Check Application Status (For ATF Use Only)

___Approved ___Abandoned Signature of Licensing Official: _____ Date: _____

___Denied ___Withdrawn Reason for Denial: _____

ATF Form 5400.14/5400.15 Part III Revised (Sep 2018)

	Yes	No
33. Have you been discharged from the Armed Forces under **dishonorable** conditions?		X

34. Country of Citizenship: *(Check/List more than one, if applicable. Nationals of the United States may check U.S.A.)*

☐ United States of America ☐ Other Country/Countries *(specify)*: _____

	Yes	No
35. Have you ever renounced your United States citizenship?		X
36. Are you an alien illegally or unlawfully in the United States?		X
37. Are you an alien who has been admitted to the United States under a nonimmigrant visa?		X

38. If you are an alien, record your U.S.-Issued Alien or Admission Number *(e.g., AR, USCIS, or I-94 number). (Please note that an employment authorization card insufficient to qualify to serve as an EP. Attach supporting documentation to this questionnaire.)*: N/A

39. Under the penalties imposed by 18 U.S.C. §§ 842 and 1001, I declare that I have examined any related documents submitted in regard to this questionnaire *(ATF Form 5400.28)*, and to the best of my knowledge and belief, they are true, correct and complete. This signature, when presented by a duly authorized representative of the U.S. Department of Justice, will constitute consent and authority for the appropriate U.S. Department of Justice representative to examine and obtain copies and abstracts of records, and to receive statements and information regarding my background. Specifically, I hereby authorize the release of the following data or records to ATF: military information/records, medical information/ records, police and/or criminal records.

Signature	Printed Name	Date
Michael T Kimmel	Michael T Kimmel	5/26/2022

*Note: A copy of this form may be used for your renewal submission *(See instruction 2 and 3)*. I certify, under penalties of perjury, that my answers on this form are still true, accurate and complete.

Your Signature *(For second submission)*	Date

This is our Most Recent Notice of Clearance. Request to add Heaven Kaercher as a responsible person submitted 3/17/2022. Have not yet received Notice of Clearance for Heaven Kaercher.

U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives
Federal Explosives Licensing Center (FELC)
www.atf.gov

Federal Explosives Licensing Center
244 Needy Road
Martinsburg, West Virginia 25405
telephone: (877)283-3352 fax: (304)616-4401

03/21/2022

NOTICE OF CLEARANCE

for individuals transporting, shipping, receiving, or possessing explosive materials.

ISSUED TO: USA LAMP & BALLAST RECYCLING INC

NOTICE DATE: 03/21/2022

Federal Explosives license/permit no.: 4-OH-051-34-2F-01199
Expiration Date: June 1, 2022
Explosives License/Permit Type: 34-USER OF EXPLOSIVES

EXPIRATION DATE: This Notice expires when superseded by a newer Notice which will list all current responsible persons and employee possessors, or when the license or permit expires - whichever comes first.

1. WARNING. Only those individuals listed below as RESPONSIBLE PERSONS and EMPLOYEE POSSESSORS with a background clearance status of "CLEARED" or "PENDING" are authorized to transport, ship, receive, or possess explosive materials in the course of employment with you.
2. "DENIED" STATUS. If an employee possessor has a background clearance status of "DENIED", you MUST take immediate steps to remove the employee from a position requiring the transporting, shipping, receiving, or possessing of explosive materials. Also, if the employee has been listed as a person authorized to accept delivery of explosive materials, you MUST remove the employee from such list and immediately, and in no event later than the second business day after such change, notify distributors of such change, as stated in 27 CFR 555.33(a).
3. CHANGE IN RESPONSIBLE PERSONS. You MUST report any change in responsible persons to the Chief, Federal Explosives Licensing Center, within 30 days of the change and new responsible persons MUST include "appropriate identifying information" as defined in 27 CFR 555.11. Fingerprints and photos are NOT required, however they will be required upon renewal of the license or permit.
4. CHANGE OF EMPLOYEES. You MUST report any change of employee/possessors to the Chief, FELC, within 30 days. Reports relating to newly hired employees must be submitted on ATF Form 5400.28 for EACH employee.

Premises Address: 715 WEST LINFOOT STREET
WAUSEON, OH 43567

Mailing Address:
USA LAMP & BALLAST RECYCLING INC
CLEANLITES RECYCLING
PO BOX 381
WAUSEON, OH 43567

This 'Notice of Clearance' is provided to you as required by 18 U.S.C. 843(h) and MUST be retained as part of your permanent records and be made available for examination or inspection by ATF officers as required by 27 CFR 555.121. If you receive a Notice subsequent to this Notice, this Notice will no longer be valid.

In accordance with 27 CFR 555.33, Background Checks and Clearances, and 27 CFR 555.57, Change of Control, Change in Responsible Persons, and Change of Employees, ATF's Federal Explosives Licensing Center (FELC) has conducted background checks on the individual(s) you identified as a responsible person(s) and an employee/possessor(s) on your application, or reported after the issuance of your license/permit.

The following is a SUMMARY of the results of the background checks conducted on the individuals you reported as responsible persons and employee/possessors. ATF will be notifying ALL individuals listed on this document of their respective status by separate letter mailed to their residence address.

PLEASE BE ADVISED THAT IT IS UNLAWFUL FOR ANY PERSON REFLECTING A STATUS OF "DENIED" TO TRANSPORT, SHIP, RECEIVE, OR POSSESS EXPLOSIVE MATERIALS.

Please carefully review this Notice to ensure that all the information is accurate. If this Notice is incorrect, please return the Notice to the Chief, FELC, with a statement showing the nature of the error(s). The Chief, FELC, shall correct the error, and return a corrected Notice.

Number of RESPONSIBLE PERSON(S) : 3
Number of EMPLOYEE POSSESSOR(S): 0

LAST NAME, First Name, Middle Name	Clearance Status
RESPONSIBLE PERSONS:	3
0001 KIMMEL, DANIEL DULEN	Cleared
0002 KIMMEL, MICHAEL THOMAS	Cleared
0003 RICHMAN, SAMANTHA NICOLE	Cleared
EMPLOYEE POSSESSORS:	0

continued

LAST NAME, First Name, Middle Name	Clearance Status

Responsible Person(s) List

11. Provide information for each individual owner, partner, and all other responsible persons *(See Definition 3)* in the trade or business operations identified in section A, block 2. List all names used by each responsible person *(i.e., nicknames, maiden name, name from previous marriage, etc.) (If additional space is needed use a separate sheet.)*

Full Name *(If the individual is an alien, also provide his/her U.S.-issued alien number or admission number.)* a	Position at Business b	Social Security Number *(Voluntary - will help prevent misidentification)* c	Home Address and E-mail Address *(Include ZIP Code)* d	Telephone Numbers *(Home/Work)* e	Date of Birth *(Month/Day/Year) (XX/XX/XXXX)* f	Place of Birth g	Country/ Countries of Citizen-ship h	Sex i	Ethnicity j	Race *(Mark all that apply)* j
Michael T Kimmel	Sr. Vice President	468 04 8869	2650 Baseline Road Stockbridge, MI 49285 mikek@cleanlites.com	517.204.7111 mobile 517.676.0044 office	10/27/1967	Mosbach, Germany	US	M	Are you Hispanic or Latino? ☐ Yes ☑ No	☐ American Indian or Alaska Native ☐ Asian ☐ Black or African American ☐ Native Hawaiian or Other Pacific Islanders ☑ White
Daniel Dulen Kimmel	Facility Manager/ Business Development	475 25 7636	783 Fairways Lane Unit B Wauseon, OH 43567 daniel.d@cleanlites.com	517.214.0453 mobile 419.330.1932 office	9/29/1992	Minneapolis, MN	US	M	Are you Hispanic or Latino? ☐ Yes ☑ No	☐ American Indian or Alaska Native ☐ Asian ☐ Black or African American ☐ Native Hawaiian or Other Pacific Islanders ☑ White
Samantha Nicole Richman	Operations/Compliance	268 98 1788	305 Burley Street Morenci, MI 49256 sam.richman @cleanlites.com	419.439.3762 mobile 419.439.3762 office	8/30/1994	Defiance, OH	US	F	Are you Hispanic or Latino? ☐ Yes ☑ No	☐ American Indian or Alaska Native ☐ Asian ☐ Black or African American ☐ Native Hawaiian or Other Pacific Islanders ☑ White
APPLICATION SUBMITTED 3/2022 Heaven Leigh Kaercher	Floor Supervisor	592 21 0749	401 Oakview Drive Delta, OH 43515	419.374.0294 mobile 419.330.1932 office	2/21/1992	West Palm, FL	US	F	Are you Hispanic or Latino? ☐ Yes ☑ No	☐ American Indian or Alaska Native ☐ Asian ☐ Black or African American ☐ Native Hawaiian or Other Pacific Islanders ☑ White
									Are you Hispanic or Latino? ☐ Yes ☐ No	☐ American Indian or Alaska Native ☐ Asian ☐ Black or African American ☐ Native Hawaiian or Other Pacific Islanders ☐ White

U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

Federal Explosives License/Permit
(18 U.S.C. Chapter 40)

In accordance with the provisions of Title XI, Organized Crime Control Act of 1970, and the regulations issued thereunder (27 CFR Part 555), you may engage in the activity specified in this license or permit within the limitations of Chapter 40, Title 18, United States Code and the regulations issued thereunder, until the expiration date shown. **THIS LICENSE IS NOT TRANSFERABLE UNDER 27 CFR 555.53.** See "WARNINGS" and "NOTICES" on reverse.

Direct ATF Correspondence To	ATF - Chief, FELC 244 Needy Road Martinsburg, WV 25405-9431	License/Permit Number	**4-OH-051-34-2F-01199**
Chief, Federal Explosives Licensing Center (FELC)	Christopher R. Reeves	Expiration Date	**June 1, 2022**

Name
CLEANLITES RECYCLING

Premises Address (Changes? Notify the FELC at least 10 days before the move.)
715 WEST LINFOOT STREET
WAUSEON, OH 43567-

Type of License or Permit
34-USER OF EXPLOSIVES

Purchasing Certification Statement

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

Mailing Address (Changes? Notify the FELC of any changes.)

USA LAMP & BALLAST RECYCLING INC
CLEANLITES RECYCLING
PO BOX 381
WAUSEON, OH 43567-

Michael T Kimmel — Licensee/Permittee Responsible Person Signature
S.V.P. — Position/Title
Michael T Kimmel — Printed Name
6/3/2019 — Date

Previous Edition is Obsolete USA LAMP & BALLAST RECYCLING INC:715 WEST LINFOOT STREET:43567:4-OH-051-34-2F-01199:June 1, 2022:34-USER OF EXPLOSIVES

ATF Form 5400.14/5400.15 Part I
Revised October 2011

Federal Explosives License (FEL) Customer Service Information

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

Toll-free Telephone Number: (877) 283-3352
Fax Number: (304) 616-4401
E-mail: FELC@atf.gov

ATF Homepage: www.atf.gov

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

Right of Succession *(27 CFR 555.59)*. (a) Certain persons other than the licensee or permittee may secure the right to carry on the same explosive materials business or operations at the same address shown on, and for the remainder of the term of, a current license or permit. Such persons are: (1) The surviving spouse or child, or executor, administrator, or other legal representative of a deceased licensee or permittee; and (2) A receiver or trustee in bankruptcy, or an assignee for benefit of creditors. (b) In order to secure the right provided by this section, the person or persons continuing the business or operations shall furnish the license or permit for for that business or operations for endorsement of such succession to the Chief, FELC, within 30 days from the date on which the successor begins to carry on the business or operations.

(Continued on reverse side)

Cut Here ✂

Federal Explosives License/Permit (FEL) Information Card

License/Permit Name: **USA LAMP & BALLAST RECYCLING INC**

Business Name: **CLEANLITES RECYCLING**

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

License/Permit Type: **34-USER OF EXPLOSIVES**

Expiration: **June 1, 2022**

Please Note: Not Valid for the Sale or Other Disposition of Explosives.

WARNINGS

1. As provided in Title XI of the Organized Crime Control Act of 1970 (U.S.C. § 842(i)), it is unlawful for any person who (1) is under indictment for, or has been convicted in any court of, a crime punishable by imprisonment for a term exceeding 1 year, (2) is a fugitive from justice, (3) is an unlawful user of, or addicted to any controlled substance *(as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802))*, (4) has been adjudicated as a mental defective or has been committed to a mental institution, to ship, transport, or receive any explosive materials in interstate or foreign commerce, (5) is an alien, other than an alien who is lawfully admitted for permanent residence *(as that term is defined in section 101(a)(20) of the Immigration and Naturalization Act)*, or meets any other exception under section 842(i)(5), (6) has been discharged from the armed forces under dishonorable conditions, or (7) having been a citizen of the United States, has renounced the citizenship of that person.
2. **Federal Regulation 27 CFR 555.53 - Licensees and permits issued under this part are not transferable to another person. In the event of the lease, sale, or other transfer of the business or operations covered by the license or permit, the successor must obtain the license or permit required by this part before commencing business or operations.**
3. **Alteration or Changes to the License or Permit. Alterations or changes in the original license or permit or in duplications thereof violates 18 U.S.C. 1001, an offense punishable by imprisonment for not more than 5 years and/or a fine of not more than $250,000.**

NOTICES

1. Any change in trade name or control of this business or operations MUST be reported within 30 days of the change to the Chief, Federal Explosives Licensing Center (FELC), 244 Needy Road, Martinsburg, WV 25405-9431. (27 CFR 555.56-555.57). A licensee or permittee who reports a Change of Control must, upon expiration of the license or permit, file an ATF Form 5400.13/5400.16.
2. Under § 555.46, Renewal of License/Permit, if a licensee or permittee intends to continue the business or operations described on a license or permit issued under this part during any portion of the ensuing year, the licensee or permittee shall, unless otherwise notified in writing by the Chief, FELC, execute and file with ATF prior to the expiration of the license or permit an application for a license or permit renewal, ATF Form 5400.14/5400.15 Part III, in accordance with the instructions on the form, and the required fee. In the event the licensee or permittee does not timely file an ATF Form 5400.14/5400.15 Part III, the licensee or permittee must file an ATF Form 5400.13/5400.16 as required by § 555.45, and obtain the required license or permit before continuing business or operations. A renewal application will automatically be mailed by ATF to the "mailing address" on the license or permit approximately 60 days prior to the expiration date of the license or permit. If the application is not received 30 days prior to the expiration date, the licensee or permittee should contact the FELC. **Note:** The user-limited permits are not renewable.
3. This license or permit is conditional upon compliance by you with the Clean Water Act (33 U.S.C. § 1341(a)).
4. THIS LICENSE OR PERMIT MUST BE POSTED AND KEPT AVAILABLE FOR INSPECTION (27 CFR 555.101).

ATF Form 5400.14/5400.15 Part I
Revised October 2011

Federal Explosives License (FEL) Customer Service Information

(Continued from front)

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

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

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

✂ Cut Here

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

Toll-free number: (877) 283-3352
Fax number: (304) 616-4401
E-mail: FELC@atf.gov

ATF Hotline Numbers

Arson Hotline: 1-888-ATF-FIRE (1-888-283-3473)
Bomb Hotline: 1-888-ATF-BOMB (1-888-283-2662)
Report Illegal Firearms Activity: 1-800-ATF-GUNS (1-800-283-4867)
Firearms Theft Hotline: 1-888-930-9275
Report Stolen, Hijacked or Seized Cigarettes: 1-800-659-6242
Other Criminal Activity: 1-888-ATF-TIPS (1-888-283-8477)

Part B Application - Subsection L
Attachment 3- PTIO Application

Application for Permit to Install (PTI) and Permit to Install/Operate (PTIO)

Ohio Environmental Protection Agency
Lazarus Government Center
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

For EPA Use Only

Application Number_____

Date Received _____

Facility Information

Note: Application is incomplete if all **bolded** questions throughout the application are not completed.

Legal Facility Name	**Cleanlites Recycling, Inc.**					
Alternate Name (if any)						
Facility Physical Address	**715 W Linfoot Street**					
City, ZIP code	**Wauseon, 43567**					
County	**Fulton**					
Facility ID						
Facility Description						
NAICS Code	**562920**					
Facility Latitude	**41**	degrees	**33**	minutes	**24.62**	seconds
Facility Longitude	**84**	degrees	**9**	minutes	**19.84**	seconds
Core Place ID (if known)						
SCSC ID (if known)						

Portable? ☐ Yes ☒ No

Portable Type ☐ Asphalt Plant ☐ Concrete Plant ☐ Generator ☐ Aggregate Processing ☐ Concrete Crusher ☐ Grinder ☐ Other

Initial Location County If "Other", describe:

Contact Information

☐ No change to information on file.

❶ ☒ Billing ☒ Owner ☒ Primary ☐ Operator ☐ On-Site ☒ Responsible Official					
Mike	**Kimmel**	**(517) 676-0044**		**mikek@cleanlites.com**	
PO Box 212		**Mason**		**MI**	**48854**

❷ ☐ Billing ☐ Owner ☐ Primary ☐ Operator ☐ On-Site ☐ Responsible Official					
First Name	Last Name	Phone	Fax	E-mail	
Address 1	Address 2	City or Township	State	Zip Code	

❸ ☐ Billing ☐ Owner ☐ Primary ☐ Operator ☐ On-Site ☐ Responsible Official					
First Name	Last Name	Phone	Fax	E-mail	
Address 1	Address 2	City or Township	State	Zip Code	

❹ ☐ Billing ☐ Owner ☐ Primary ☐ Operator ☐ On-Site ☐ Responsible Official					
First Name	Last Name	Phone	Fax	E-mail	
Address 1	Address 2	City or Township	State	Zip Code	

❺ ☐ Billing ☐ Owner ☐ Primary ☐ Operator ☐ On-Site ☐ Responsible Official					
First Name	Last Name	Phone	Fax	E-mail	
Address 1	Address 2	City or Township	State	Zip Code	

❻ ☐ Billing ☐ Owner ☐ Primary ☐ Operator ☐ On-Site ☐ Responsible Official					
First Name	Last Name	Phone	Fax	E-mail	
Address 1	Address 2	City or Township	State	Zip Code	

Division of Air Pollution Control
Application for Permit-to-Install or Permit-to-Install and Operate

Section I – General Application Information

This section should be filled out for each permit to install (PTI) or Permit to Install and Operate (PTIO) application. A PTI is required for all air contaminant sources (emissions units) installed or modified after January 1, 1974 that are subject to OAC Chapter 3745-77. A PTIO is required for all air contaminant sources (emissions units) that are not subject to OAC Chapter 3745-77 (Title V). See the application instructions for additional information.

For OEPA use only:		
	☒ Installation	☐ Request Federally enforceable restrictions
	☐ Modification	☐ General Permit
	☐ Renewal	☐ Other

1. Is the purpose of this application to transition from OAC Chapter 3745-77 (Title V) to OAC Chapter 3745-31 (PTIO)?

   ☐ yes ☒ no

2. **Establish PER Due Date** - Select an annual Permit Evaluation Report (PER) due date for this facility (does not apply to facilities subject to Title V, OAC Chapter 3745-77). If the PER has previously been established and a change is now desired, a PER Change Request form must be filed instead of selecting a date here.

Due Date:	For Time Period:
☒ February 15	January 1 through December 31
☐ May 15	April 1 through March 31
☐ August 15	July 1 through June 30
☐ November 15	October 1 through September 30

   ☐ PER not applicable (Title V) or due date already established
   ☐ PER Request Permit Change form attached

3. **Federal Rules Applicability** - Please check all of the appropriate boxes below.

New Source Performance Standards (NSPS) *New Source Performance Standards are listed under 40 CFR 60 - Standards of Performance for New Stationary Sources.*	☒ not affected ☐ subject to Subpart: _____ ☐ unknown ☐ exempt - explain below
National Emission Standards for Hazardous Air Pollutants (NESHAP) *National Emissions Standards for Hazardous Air Pollutants are listed under 40 CFR 61. (These include asbestos, benzene, beryllium, mercury, and vinyl chloride).*	☒ not affected ☐ subject to Subpart: _____ ☐ unknown ☐ subject, but exempt - explain below
Maximum Achievable Control Technology (MACT) *The Maximum Achievable Control Technology standards are listed under 40 CFR 63 and OAC rule 3745-31-28.*	☒ not affected ☐ subject to Subpart: _____ ☐ unknown ☐ subject, but exempt - explain below
Prevention of Significant Deterioration (PSD) *These rules are found under OAC rule 3745-31-10 through OAC rule 3745-31-20.*	☒ not affected ☐ subject to regulation ☐ unknown
Non-Attainment New Source Review *These rules are found under OAC rule 3745-31-21 through OAC rule 3745-31-27.*	☒ not affected ☐ subject to regulation ☐ unknown
112 (r) - Risk Management Plan *These rules are found under 40 CFR 68.*	☒ not affected ☐ subject to regulation ☐ unknown
Title IV (Acid Rain Requirements) *These rules are found under 40 CFR 72 and 40 CFR 73.*	☒ not affected ☐ subject to regulation ☐ unknown

Please explain why you checked "exempt" in this question for one or more federal rules. Identify each exemption and whether the entire facility and/or the specific air contaminant sources included in this permit application is exempted. Attach an additional page if necessary.

4. Express PTI/PTIO - Do you qualify for express PTI or PTIO processing?

☒ yes ☐ no

If yes, are you requesting express processing per OAC rule 3745-31-05?

☒ yes ☐ no

5. **Air Contaminant Sources in this Application** - Identify the air contaminant source(s) for which you are applying below. Attach additional pages if necessary. Section II of this application and an EAC form should be completed for each air contaminant source.

Emissions Unit ID*	**Company Equipment ID** (company's name for air contaminant source)	**Equipment Description** (List all equipment that are a part of this air contaminant source)
	Airbag Deactivation Kiln #1	**Rotary kiln for automobile airbag inflator deactivation**

* This ID would have been created when a previous air permit was issued. If no previous permits have been issued for this air contaminant source, leave this field blank. If this air contaminant source was previously identified in STARShip applications as a "Z" source (e.g., Z001), please provide that identification and a new ID will be assigned when the PTI/PTIO is issued.

6. Trade Secret Information - Is any information included in this application being claimed as a trade secret per Ohio Revised Code (ORC) 3704.08?

☐ yes (A "non-confidential" version must also be submitted in order for this application to be deemed complete.)
☒ no

7. Permit Application Contact - Person to contact for questions about this application:

Tim Kimmel	**Vice President**
Name	Title

419 Northland Blvd, Cincinnati, OH 45240
Address (Street, City/Township, State and Zip Code)

(513) 851-3500	**(513) 641-4156**	**timothy.kimmel@cleanlites.com**
Phone	Fax	E-mail

8. **Authorized Signature** – OAC rule 3745-31-04 states that applications for permits to install or permits to install and operate shall be signed:
   (1) In the case of a corporation, by a principal executive officer of at least the level of vice president, or his duly authorized representative, if such representative is responsible for the overall operation of the facility.
   (2) In the case of a partnership by a general partner.
   (3) In the case of sole proprietorship, by the proprietor, and
   (4) In the case of a municipal, state, federal or other governmental facility, by the principal executive officer, the ranking elected official, or other duly authorized employee.

   Under OAC rule 3745-31-04, this signature shall constitute personal affirmation that all statements or assertions of fact made in the application are true and complete, comply fully with applicable state requirements, and shall subject the signatory to liability under applicable state laws forbidding false or misleading statements.

Authorized Signature (for facility)	Date
Mike Kimmel	**Vice President**
Print Name	Title

Section II - Specific Air Contaminant Source Information

Facility ID: _____
Emissions Unit ID: _____
Company Equipment ID: Airbag Deactivation Kiln #1

One copy of this section should be filled out for each air contaminant source (emissions unit) covered by this PTI/PTIO application identified in Section I, Question 5. See the application instructions for additional information.

1. **Air Contaminant Source Installation or Modification Schedule** – Check all that apply (must be completed regardless of date of installation or modification):

☒ New installation (for which construction has not yet begun, in accordance with OAC rule 3745-31-33). When will you begin to install the air contaminant source?

(month/year) _____ **OR** ☒ after installation permit has been issued

☐ Initial application for an air contaminant source already installed or under construction. Identify installation date or the date construction began (month/year) _____ and the date operation began (month/year) _____

☐ Modification to an existing air contaminant source/facility (for which modification has not yet begun) - List previous PTI or PTIO number(s) for air contaminant sources included in this application, if applicable, and describe the requested modification (attach an additional sheet, if necessary):

_____

When will you begin to modify the air contaminant source? (month/year) _____ **OR** ☐ after modification permit has been issued

☐ Modification application for an air contaminant source which has been or is currently being modified. List previous PTI or PTIO number(s) for air contaminant sources included in this application, if applicable, and describe the requested modification (attach an additional sheet, if necessary):

_____

Identify modification date or the date modification began (month/year) _____ and the date operation began (month/year) _____

☐ Reconstruction of an existing air contaminant source/facility. Please explain: _____

_____

☐ Renewal of an existing permit-to-operate (PTO) or PTIO

Identify the date operation began after installation or latest modification (month/year) _____

☐ General Permit General Permit Category_____ General Permit Type _____

Complete, sign and attach the appropriate Qualifying Criteria Document

☐ Other, please explain: _____

2. **SCC Codes** - List all Source Classification Code(s) (SCC) that describe the process(es) performed by this air contaminant source (e.g., 1-02-002-04).

5-01-105-35 _____ _____ _____ _____ _____ _____ _____

3. **Emissions Information** - The following table requests information needed to determine the applicable requirements and the compliance status of this air contaminant source with those requirements. Suggestions for how to estimate emissions may be found in the instructions to the Emissions Activity Category (EAC) forms required with this application. If you need further assistance, contact your District Office/Local Air Agency representative.
   - If total potential emissions of HAPs or any Toxic Air Contaminant (as identified in OAC rule 3745-114-01) are greater than 1 ton/yr, fill in the table for that (those) pollutant(s). For all other pollutants, if "Emissions before controls (max), lb/hr" multiplied by 24 hours/day is greater than 10 lbs/day, fill in the table for that pollutant.
   - Actual emissions are calculated including add-on control equipment. If you have no add-on control equipment, "Emissions before controls" will be the same as "Actual emissions".
   - Actual emissions and Requested Allowable should be based on operating 8760 hr/yr unless you are requesting federally enforceable operating restrictions to limit emissions. If so, calculate emissions based on requested operating restrictions and describe in your calculations.
   - If you use units other than lbs/hr or ton/yr, specify the units used (e.g., gr/dscf, lb/ton charged, lb/MMBtu, tons/12-months).
   - Requested Allowable (ton/yr) is often equivalent to Potential to Emit (PTE) as defined in OAC rule 3745-31-01 and OAC rule 3745-77-01.

Pollutant	Emissions before controls (max)* (lb/hr)	Actual emissions* (lb/hr)	Actual emissions* (ton/year)	Requested Allowable* (lb/hr)	Requested Allowable* (ton/year)
Particulate emissions (PE/PM) (formerly particulate matter, PM)					
PM # 10 microns in diameter (PE/PM_{10})					
PM # 2.5 microns in diameter ($PE/PM_{2.5}$)					
Sulfur dioxide (SO_2)					
Nitrogen oxides (NO_x)					
Carbon monoxide (CO)	**0.51**	**0.51**	**2.24**	**0.51**	**2.24**
Organic compounds (OC)					
Volatile organic compounds (VOC)					
Lead (Pb)					
Total Hazardous Air Pollutants (HAPs)					
Highest single HAP:					
Toxic Air Contaminants (see instructions):					

* Provide your calculations as an attachment and explain how all process variables and emission factors were selected. Note the emission factor(s) employed and document origin. Example: AP-42, Table 4.4-3 (8/97); stack test, Method 5, 4/96; mass balance based on MSDS; etc.

4. **Best Available Technology (BAT)** - For each pollutant for which the Requested Allowable in the above table exceeds 10 tons per year, BAT, as defined in OAC 3745-31-01, is required. Describe what has been selected as BAT and the basis for the selection:

_____

5. **Control Equipment** - Does this air contaminant source employ emissions control equipment?

☒ Yes - fill out the applicable information below.
☐ No - proceed to Question 6.
Select the type(s) of control equipment employed below (required data for selected control equipment in **bold**):

Pollutant abbreviations

PE/PM = Particulate emissions (formerly particulate matter)
$PE/PM_{2.5}$ = PM # 2.5 microns in diameter
VOC = Volatile organic compounds
NO_x = Nitrogen oxides
PE/PM_{10} = PM # 10 microns in diameter
OC = Organic compounds
SO_2 = Sulfur dioxide
CO = Carbon monoxide
Pb = Lead

☐ Adsorber
Manufacturer: _____ Year installed: _____ **Your ID for control equipment** _____
Describe this control equipment: _____
Pollutant(s) controlled: ☐ PE/PM ☐ PE/PM_{10} ☐ $PE/PM_{2.5}$ ☐ OC ☐ VOC
☐ SO_2 ☐ NO_x ☐ CO ☐ Pb ☐ Other _____
Estimated capture efficiency (%): _____ Basis for efficiency: _____
Design control efficiency (%): _____ Basis for efficiency: _____
Operating control efficiency (%): _____ Basis for efficiency: _____
Type: ☐ **Fluidized Bed** ☐ **Fixed Bed** ☐ **Moving Bed** ☐ **Disposable** ☐ **Concentrator** ☐ **Other** _____
Adsorption Media: _____
For Fluidized Bed, Fixed Bed, Moving Bed and Disposable only:
Maximum design outlet organic compound concentration (ppmv): _____
Media replacement frequency or regeneration cycle time (specify units): _____
Maximum temperature of the media bed, after regeneration (including any cooling cycle): _____
For Concentrator Only:
Design regeneration cycle time (minutes): _____
Minimum desorption air stream temperature (°F): _____
Rotational rate (revolutions/hour): _____
Inlet gas flow rate (acfm): _____ Outlet gas flow rate (acfm) : _____
Inlet gas temperature (°F): _____ Outlet gas temperature (°F): _____
☐ **This is the only control equipment on this air contaminant source**
If not, this control equipment is: ☐ Primary ☐ Secondary ☐ Parallel
List all other air contaminant sources that are also vented to this control equipment: _____
List all egress point IDs (from Table 7-A) associated with this control equipment: _____

☐ Catalytic Converter
Manufacturer: _____ Year installed: _____ **Your ID for control equipment** _____
Describe this control equipment: _____
Pollutant(s) controlled: ☐ PE/PM ☐ PE/PM_{10} ☐ $PE/PM_{2.5}$ ☐ OC ☐ VOC
☐ SO_2 ☐ NO_x ☐ CO ☐ Pb ☐ Other _____
Estimated capture efficiency (%): _____ Basis for efficiency: _____
Design control efficiency (%): _____ Basis for efficiency: _____
Operating control efficiency (%): _____ Basis for efficiency: _____
☐ **This is the only control equipment on this air contaminant source**
If not, this control equipment is: ☐ Primary ☐ Secondary ☐ Parallel
List all other air contaminant sources that are also vented to this control equipment: _____
List all egress point IDs (from Table 7-A) associated with this control equipment: _____

☐ Catalytic Incinerator
Manufacturer: _____ Year installed: _____ **Your ID for control equipment** _____
Describe this control equipment: _____
Pollutant(s) controlled: ☐ PE/PM ☐ PE/PM_{10} ☐ $PE/PM_{2.5}$ ☐ OC ☐ VOC
☐ SO_2 ☐ NO_x ☐ CO ☐ Pb ☐ Other _____
Estimated capture efficiency (%): _____ Basis for efficiency: _____
Design control efficiency (%): _____ Basis for efficiency: _____
Operating control efficiency (%): _____ Basis for efficiency: _____
Combustion chamber residence time (seconds): _____
Minimum temperature difference (°F) across catalyst during air contaminant source operation: _____
Inlet gas flow rate (acfm): _____ Outlet gas flow rate (acfm) : _____
Minimum inlet gas temperature (°F): _____ Outlet gas temperature (°F): _____
☐ **This is the only control equipment on this air contaminant source**
If not, this control equipment is: ☐ Primary ☐ Secondary ☐ Parallel
List all other air contaminant sources that are also vented to this control equipment: _____
List all egress point IDs (from Table 7-A) associated with this control equipment: _____

☐ Condenser
Manufacturer: _____ Year installed: _____ **Your ID for control equipment** _____
Describe this control equipment: _____
Pollutant(s) controlled: ☐ PE/PM ☐ PE/PM_{10} ☐ $PE/PM_{2.5}$ ☐ OC ☐ VOC
☐ SO_2 ☐ NO_x ☐ CO ☐ Pb ☐ Other _____
Estimated capture efficiency (%): _____ Basis for efficiency: _____
Design control efficiency (%): _____ Basis for efficiency: _____
Operating control efficiency (%): _____ Basis for efficiency: _____
Type: ☐ **Indirect contact** ☐ **Direct contact** ☐ **Freeboard refrigeration device** ☐ **Other:** _____
Maximum exhaust gas temperature (°F) during air contaminant source operation: _____
Coolant type: _____
Design coolant temperature (°F): Minimum _____ Maximum _____
Design coolant flow rate (gpm): _____
Inlet gas flow rate (acfm): _____ Outlet gas flow rate (acfm) : _____
Inlet gas temperature (°F): _____
☐ **This is the only control equipment on this air contaminant source**
If not, this control equipment is: ☐ Primary ☐ Secondary ☐ Parallel
List all other air contaminant sources that are also vented to this control equipment: _____
List all egress point IDs (from Table 7-A) associated with this control equipment: _____

☐ Cyclone/Multiclone
Manufacturer: _____ Year installed: _____ **Your ID for control equipment** _____
Describe this control equipment: _____
Pollutant(s) controlled: ☐ PE/PM ☐ PE/PM_{10} ☐ $PE/PM_{2.5}$ ☐ OC ☐ VOC
☐ SO_2 ☐ NO_x ☐ CO ☐ Pb ☐ Other _____
Estimated capture efficiency (%): _____ Basis for efficiency: _____
Design control efficiency (%): _____ Basis for efficiency: _____
Operating control efficiency (%): _____ Basis for efficiency: _____
Type: ☐ **Simple** ☐ **Multiclone** ☐ **Rotoclone** ☐ **Other** _____
Operating pressure drop range (inches of water): Minimum: _____ Maximum: _____
Inlet gas flow rate (acfm): _____ Outlet gas flow rate (acfm) : _____
☐ **This is the only control equipment on this air contaminant source**
If not, this control equipment is: ☐ Primary ☐ Secondary ☐ Parallel
List all other air contaminant sources that are also vented to this control equipment: _____
List all egress point IDs (from Table 7-A) associated with this control equipment: _____

☐ Dry Scrubber
Manufacturer: _____ Year installed: _____ **Your ID for control equipment** _____
Describe this control equipment: _____
Pollutant(s) controlled: ☐ PE/PM ☐ PE/PM_{10} ☐ $PE/PM_{2.5}$ ☐ OC ☐ VOC
☐ SO_2 ☐ NO_x ☐ CO ☐ Pb ☐ Other _____
Estimated capture efficiency (%): _____ Basis for efficiency: _____
Design control efficiency (%): _____ Basis for efficiency: _____
Operating control efficiency (%): _____ Basis for efficiency: _____
Reagent(s) used: Type: _____ **Injection rate(s):** _____
Inlet gas flow rate (acfm): _____ Outlet gas flow rate (acfm) : _____
Inlet gas temperature (°F): _____ Outlet gas temperature (°F): _____
☐ **This is the only control equipment on this air contaminant source**
If not, this control equipment is: ☐ Primary ☐ Secondary ☐ Parallel
List all other air contaminant sources that are also vented to this control equipment: _____
List all egress point IDs (from Table 7-A) associated with this control equipment: _____

☐ Electrostatic Precipitator
Manufacturer: _____ Year installed: _____ **Your ID for control equipment** _____
Describe this control equipment: _____
Pollutant(s) controlled: ☐ PE/PM ☐ PE/PM_{10} ☐ $PE/PM_{2.5}$ ☐ OC ☐ VOC
☐ SO_2 ☐ NO_x ☐ CO ☐ Pb ☐ Other _____
Estimated capture efficiency (%): _____ Basis for efficiency: _____
Design control efficiency (%): _____ Basis for efficiency: _____

Operating control efficiency (%): _____ Basis for efficiency:_____
Type: ☐ **Dry** ☐ **Wet** ☐ **Other:** _____
Number of operating fields: _____
Secondary voltage (V) range (minimum – maximum): _____
Secondary current (milliamps) range (minimum – maximum): _____
Inlet gas flow rate (acfm): _____ Outlet gas flow rate (acfm) : _____
☐ **This is the only control equipment on this air contaminant source**
If not, this control equipment is: ☐ Primary ☐ Secondary ☐ Parallel
List all other air contaminant sources that are also vented to this control equipment: _____
List all egress point IDs (from Table 7-A) associated with this control equipment: _____

☒ Fabric Filter/Baghouse
Manufacturer: _____ Year installed: _____ **Your ID for control equipment: Kiln #1 Baghouse**
Describe this control equipment: Airbag Deactivation Kiln #1 Baghouse
Pollutant(s) controlled: ☒ PE/PM ☒ PE/PM_{10} ☒ $PE/PM_{2.5}$ ☐ OC ☐ VOC
☐ SO_2 ☐ NO_x ☐ CO ☐ Pb ☐ Other _____
Estimated capture efficiency (%): 100% Basis for efficiency: **Manufacturer specifications**
Design control efficiency (%): 99.9% Basis for efficiency: **Manufacturer specifications**
Operating control efficiency (%): 99.9% Basis for efficiency: **Manufacturer specifications**
Operating pressure drop range (inches of water): Minimum: 2 Maximum: 8
Pressure type: ☒ **Negative pressure** ☐ **Positive pressure**
Fabric cleaning mechanism: ☐ Reverse air ☒ Pulse jet ☐ Shaker ☐ Other _____
Bag leak detection system: ☒ Yes ☐ No Type: **In-stream sensor**
☐ **Lime injection or fabric coating agent used: Type:** _____ **Feed rate:** _____
Inlet gas flow rate (acfm): _____ Outlet gas flow rate (acfm) : _____
Inlet gas temperature (°F): _____ Outlet gas temperature (°F): _____
☒ **This is the only control equipment on this air contaminant source**
If not, this control equipment is: ☐ Primary ☐ Secondary ☐ Parallel
List all other air contaminant sources that are also vented to this control equipment: _____
List all egress point IDs (from Table 7-A) associated with this control equipment: Airbag Deactivation Kiln Stack #1

☐ Flare
Manufacturer: _____ Year installed: _____ **Your ID for control equipment** _____
Describe this control equipment: _____
Pollutant(s) controlled: ☐ PE/PM ☐ PE/PM_{10} ☐ $PE/PM_{2.5}$ ☐ OC ☐ VOC
☐ SO_2 ☐ NO_x ☐ CO ☐ Pb ☐ Other _____
Estimated capture efficiency (%): _____ Basis for efficiency:_____
Design control efficiency (%): _____ Basis for efficiency:_____
Operating control efficiency (%): _____ Basis for efficiency:_____
Type: ☐ **Enclosed** ☐ **Elevated (open)**
If Elevated (open): ☐ **Air-assisted** ☐ **Steam-assisted** ☐ **Non-assisted**
Ignition device: ☐ **Electric arc** ☐ **Pilot flame**
Flame presence sensor: ☐ **Yes** ☐ **No**
Inlet gas flow rate (acfm): _____ Outlet gas flow rate (acfm) : _____
Inlet gas temperature (°F): _____ Outlet gas temperature (°F): _____
☐ **This is the only control equipment on this air contaminant source**
If not, this control equipment is: ☐ Primary ☐ Secondary ☐ Parallel
List all other air contaminant sources that are also vented to this control equipment: _____
List all egress point IDs (from Table 7-A) associated with this control equipment: _____

☐ Fugitive Dust Suppression
Suppressant Type: ☐ **Water** ☐ **Chemical** ☐ **Calcium chloride** ☐ **Asphaltic cement** ☐ **Other** _____
Method of application: _____
Application rate (specify units): _____
Application frequency: _____
List all egress point IDs (from Table 7-B) associated with this control strategy:_____

☐ NOx Reduction Technology
Manufacturer: _____ Year installed: _____ **Your ID for control equipment** _____
Describe this control equipment: _____
Pollutant(s) controlled: ☐ PE/PM ☐ PE/PM_{10} ☐ $PE/PM_{2.5}$ ☐ OC ☐ VOC
☐ SO_2 ☐ NO_x ☐ CO ☐ Pb ☐ Other _____
Estimated capture efficiency (%): _____ Basis for efficiency: _____
Design control efficiency (%): _____ Basis for efficiency: _____
Operating control efficiency (%): _____ Basis for efficiency: _____
NOx Reduction Type: ☐ **Selective Catalytic** ☐ **Non-Selective Catalytic** ☐ **Selective Non-Catalytic**
Inlet temp.: _____ **Outlet temp.:** _____
Inlet gas flow rate (acfm): _____
For Selective types only:
Reagent type: _____
Reagent injection rate (specify units): _____
Reagent slip (acfm): _____
☐ **This is the only control equipment on this air contaminant source**
If not, this control equipment is: ☐ Primary ☐ Secondary ☐ Parallel
List all other air contaminant sources that are also vented to this control equipment: _____
List all egress point IDs (from Table 7-A) associated with this control equipment: _____

☐ Passive Filter
Type: ☐ **Bin vent** ☐ **Paint booth filter** ☐ **Filter sock** ☐ **Other:** _____ **Your ID for filter** _____
Design control efficiency (%): _____ Basis for efficiency: _____
Change frequency: _____
Inlet gas flow rate (acfm): _____ Outlet gas flow rate (acfm) : _____
List all egress point IDs (from Table 7-A) associated with this control equipment: _____

☐ Settling Chamber
Manufacturer: _____ Year installed: _____ **Your ID for control equipment** _____
Describe this control equipment: _____
Pollutant(s) controlled: ☐ PE/PM ☐ PE/PM_{10} ☐ $PE/PM_{2.5}$ ☐ OC ☐ VOC
☐ SO_2 ☐ NO_x ☐ CO ☐ Pb ☐ Other _____
Estimated capture efficiency (%): _____ Basis for efficiency: _____
Design control efficiency (%): _____ Basis for efficiency: _____
Operating control efficiency (%): _____ Basis for efficiency: _____
Length x Width x Height: _____
☐ **This is the only control equipment on this air contaminant source**
If not, this control equipment is: ☐ Primary ☐ Secondary ☐ Parallel
List all other air contaminant sources that are also vented to this control equipment: _____
List all egress point IDs (from Table 7-A) associated with this control equipment: _____

☐ Thermal Incinerator/Thermal Oxidizer
Manufacturer: _____ Year installed: _____ **Your ID for control equipment** _____
Describe this control equipment: _____
Pollutant(s) controlled: ☐ PE/PM ☐ PE/PM_{10} ☐ $PE/PM_{2.5}$ ☐ OC ☐ VOC
☐ SO_2 ☐ NO_x ☐ CO ☐ Pb ☐ Other _____
Estimated capture efficiency (%): _____ Basis for efficiency: _____
Design control efficiency (%): _____ Basis for efficiency: _____
Operating control efficiency (%): _____ Basis for efficiency: _____
Minimum operating temp. (°F) and sensor location: _____ (See application instructions)
Combustion chamber residence time (seconds): _____
Inlet gas flow rate (acfm): _____ Outlet gas flow rate (acfm) : _____
Inlet gas temperature (°F): _____ Outlet gas temperature (°F): _____
☐ **This is the only control equipment on this air contaminant source**
If not, this control equipment is: ☐ Primary ☐ Secondary ☐ Parallel
List all other air contaminant sources that are also vented to this control equipment: _____
List all egress point IDs (from Table 7-A) associated with this control equipment: _____

☐ Wet Scrubber
Manufacturer: _____ Year installed: _____ **Your ID for control equipment** _____
Describe this control equipment: _____
Pollutant(s) controlled: ☐ PE/PM ☐ PE/PM_{10} ☐ $PE/PM_{2.5}$ ☐ OC ☐ VOC
☐ SO_2 ☐ NO_x ☐ CO ☐ Pb ☐ Other _____
Estimated capture efficiency (%): _____ Basis for efficiency:_____
Design control efficiency (%): _____ Basis for efficiency:_____
Operating control efficiency (%): _____ Basis for efficiency:_____
Operating pressure drop range (inches of water): Minimum: _____ Maximum: _____
Type: ☐ **Impingement** ☐ **Packed bed** ☐ **Spray chamber** ☐ **Venturi** ☐ **Other:** _____
pH range for scrubbing liquid: Minimum: _____ Maximum: _____
Is scrubber liquid recirculated? ☐ Yes ☐ No
Scrubber liquid flow rate (gal/min): _____
Scrubber liquid supply pressure (psig): _____ NOTE: This item for spray chambers only.
Inlet gas flow rate (acfm): _____ Outlet gas flow rate (acfm) : _____
Inlet gas temperature (°F): _____ Outlet gas temperature (°F): _____
☐ **This is the only control equipment on this air contaminant source**
If not, this control equipment is: ☐ Primary ☐ Secondary ☐ Parallel
List all other air contaminant sources that are also vented to this control equipment: _____
List all egress point IDs (from Table 7-A) associated with this control equipment: _____

☐ Other
Type: describe _____
Manufacturer: _____ Year installed: _____ **Your ID for control equipment** _____
Describe this control equipment: _____
Pollutant(s) controlled: ☐ PE/PM ☐ PE/PM_{10} ☐ $PE/PM_{2.5}$ ☐ OC ☐ VOC
☐ SO_2 ☐ NO_x ☐ CO ☐ Pb ☐ Other _____
Estimated capture efficiency (%): _____ Basis for efficiency:_____
Design control efficiency (%): _____ Basis for efficiency:_____
Operating control efficiency (%): _____ Basis for efficiency:_____
☐ **This is the only control equipment on this air contaminant source**
If not, this control equipment is: ☐ Primary ☐ Secondary ☐ Parallel
List all other air contaminant sources that are also vented to this control equipment: _____
List all egress point IDs (from Table 7-A) associated with this control equipment: _____

6. **Process Flow Diagram** - Attach a Process Flow Diagram to this application for this air contaminant source. See the application instructions for additional information.

7. **Modeling information: (Note: items in bold in Tables 7-A and/or 7-B, as applicable, are required even if the tables do not otherwise need to be completed. If applicable, all information is required.)** An air quality modeling analysis is required for PTIs and PTIOs for new installations or modifications, as defined in OAC rule 3745-31-01, where either the increase of toxic air contaminants from any air contaminant source or the increase of any other pollutant for all air contaminant sources combined exceed a threshold listed below. This analysis is to assure that the impact from the requested project will not exceed Ohio's Acceptable Incremental Impacts for criteria pollutants and/or Maximum Allowable Ground Level Concentrations (MAGLC) for toxic air contaminants. (See Ohio EPA, DAPC's Engineering Guide #69 for more information.) Permit requests that would have unacceptable impacts cannot be approved as proposed. See the line-by-line PTI/PTIO instructions for additional information.

Complete Tables 7-A and 7-C for stack emissions egress points and/or Table 7-B and 7-C for fugitive emissions egress points below if the requested allowable annual emission rate for this PTI or PTIO exceeds any of the following:

- Particulate Emissions (PE/PM_{10}): 10 tons per year
- Sulfur Dioxide (SO2): 25 tons per year
- Nitrogen Oxides (NOx): 25 tons per year
- Carbon Monoxide (CO): 100 tons per year
- Lead (Pb): 0.6 ton per year
- Toxic Air Contaminants: 1 ton per year. Toxic air contaminants are identified in OAC rule 3745-114-01.

Complete Table 7-A below for each stack emissions egress point. An egress point is a point at which emissions from an air contaminant source are released into the ambient (outside) air. List each individual egress point on a separate pair of lines. In each case, use the dimensions of the tallest nearby (or attached) building, building segment or structure.

Table 7-A, Stack Egress Point Information

❶ **Company ID for the Egress Point** **Airbag Deactivation Kiln Stack #1**	Type Code*	Dimensions or Diameter	Height from the Ground (ft)	Temp. at Max. Operation (F)	Flow Rate at Max. Operation (ACFM)	Minimum Distance to Fence Line (ft)
Company Description for the Egress Point **Stack for Airbag Deactivation Kiln**	Shape: round, square, rectangular	Cross Sectional Area	Base Elevation (ft)	Building Height (ft)	Building Width (ft)	Building Length (ft)

❷ **Company ID for the Egress Point**	Type Code*	Dimensions or Diameter	Height from the Ground (ft)	Temp. at Max. Operation (F)	Flow Rate at Max. Operation (ACFM)	Minimum Distance to Fence Line (ft)
Company Description for the Egress Point	Shape: round, square, rectangular	Cross Sectional Area	Base Elevation (ft)	Building Height (ft)	Building Width (ft)	Building Length (ft)

❸ **Company ID for the Egress Point**	Type Code*	Dimensions or Diameter	Height from the Ground (ft)	Temp. at Max. Operation (F)	Flow Rate at Max. Operation (ACFM)	Minimum Distance to Fence Line (ft)
Company Description for the Egress Point	Shape: round, square, rectangular	Cross Sectional Area	Base Elevation (ft)	Building Height (ft)	Building Width (ft)	Building Length (ft)

❹ **Company ID for the Egress Point**	Type Code*	Dimensions or Diameter	Height from the Ground (ft)	Temp. at Max. Operation (F)	Flow Rate at Max. Operation (ACFM)	Minimum Distance to Fence Line (ft)
Company Description for the Egress Point	Shape: round, square, rectangular	Cross Sectional Area	Base Elevation (ft)	Building Height (ft)	Building Width (ft)	Building Length (ft)

*Type codes for stack egress points:

A. vertical stack (unobstructed): There are no obstructions to upward flow in or on the stack such as a rain cap.
B. vertical stack (obstructed): There are obstructions to the upward flow, such as a rain cap, which prevents or inhibits the air flow in a vertical direction.
C. non-vertical stack: The stack directs the air flow in a direction which is not directly upward.

Complete Table 7-B below for each fugitive emissions egress point. List each individual egress point on a separate line. Refer to the description of the fugitive egress point types below the table for use in completing the type column of the table. For an air contaminant source with multiple fugitive emissions egress points, include only the primary egress points.

Table 7-B, Fugitive Egress Point Information

❶ **Company ID or Name for the Egress Point**	Type* (check one) ☐ Area ☐ Volume	Area Source Dimensions (Length x Width, in feet)	Volume Source Dimensions (Height x Width, in feet)
Company Description for the Egress Point	Release Height (ft)	Exit Gas Temp. (only if in excess of 100° F) (° F)	Minimum Distance to the Fence Line (ft)

❷ **Company ID or Name for the Egress Point**	Type* (check one) ☐ Area ☐ Volume	Area Source Dimensions (Length x Width, in feet)	Volume Source Dimensions (Height x Width, in feet)
Company Description for the Egress Point	Release Height (ft)	Exit Gas Temp. (only if in excess of 100° F) (° F)	Minimum Distance to the Fence Line (ft)

❸ **Company ID or Name for the Egress Point**	Type* (check one) ☐ Area ☐ Volume	Area Source Dimensions (Length x Width, in feet)	Volume Source Dimensions (Height x Width, in feet)
Company Description for the Egress Point	Release Height (ft)	Exit Gas Temp. (only if in excess of 100° F) (° F)	Minimum Distance to the Fence Line (ft)

*Types for fugitive egress point:

Area: an open fugitive source characterized as a horizontal area (L x W) with a release height. For irregular surfaces such as storage piles, enter dimensions of an average cross section; release height is entered as half of the maximum pile height. For process sources such as crushers, use the process opening (e.g., area of crusher hopper opening) and ignore material handling and storage emissions points.

Volume: an unpowered vertical opening, such as a window or roof monitor, characterized as a vertical area (W x H) with a release height, measured at the midpoint of the opening. Multiple openings in a building may be averaged, if necessary.

Use the same Company Name or ID for the Egress Point in Table 7-C that was used in Table 7-A or 7-B. See the line-by-line PTI/PTIO instructions for additional information.

Table 7-C, Egress Point Location

Company Name or ID for the Egress Point (as identified above)	Egress Point Latitude			Egress Point Longitude		
	deg	min	sec	deg	min	sec
	deg	min	sec	deg	min	sec
	deg	min	sec	deg	min	sec
	deg	min	sec	deg	min	sec
	deg	min	sec	deg	min	sec

8. Request for Enforceable Restrictions - As part of this permit application, do you wish to propose voluntary restrictions to limit emissions in order to avoid specific requirements listed below, (i.e., are you requesting state-only enforceable limits or state and federally enforceable limits to obtain synthetic minor status)?

☐ yes
☒ no
☐ not sure - please contact me to discuss whether this affects the facility.

If yes, why are you requesting enforceable restrictions? Check all that apply.

☐ a. to avoid being a major Title V source (see OAC rule 3745-77-01 and OAC rule 3745-31)
☐ b. to avoid being a major MACT source (see OAC rule 3745-31-01)
☐ c. to avoid being a major stationary source (see OAC rule 3745-31-01)
☐ d. to avoid being a major modification (see OAC rule 3745-31-01)
☐ e. to avoid an air dispersion modeling requirement (see Engineering Guide # 69)
☐ f. to avoid BAT requirements (see OAC rule 3745-31-05(A)(3)(b))
☐ g. to avoid another requirement. Describe: _____

If you checked a., b. or c., please attach a facility-wide potential to emit (PTE) analysis (for each pollutant) and synthetic minor strategy to this application. (See application instructions for definition of PTE.) If you checked d., please attach a net emission change analysis to this application. If you checked e., f. or g., please attach a description of the restrictions proposed and how compliance with those restrictions will be verified.

9. Continuous Emissions Monitoring – Does this air contaminant source utilize any continuous emissions monitoring (CEM) equipment for indicating or demonstrating compliance? This does not include continuous parametric monitoring systems.

☐ yes ☒ no

If yes, complete the following information.

Company Name or ID for the Egress Point _____

CEM Description_____

This CEM monitors (check all that apply):

☐ Opacity ☐ Flow ☐ CO ☐ NOx ☐ SO_2 ☐ THC ☐ HCl ☐ HF ☐ H_2S ☐ TRS ☐ CO_2 ☐ O_2 ☐ PM

10. **EAC Forms** - The appropriate Emissions Activity Category (EAC) form(s) must be completed and attached for each air contaminant source unless a general permit is being requested. At least one complete EAC form must be submitted for each air contaminant source for the application to be considered complete. Refer to the list attached to the application instructions. Please indicate which EAC form corresponds to this air contaminant source.

General Process EAC Form 3100 attached

FOR OHIO EPA USE
FACILITY ID:_____

EU ID: _____ PTI # _____

EMISSIONS ACTIVITY CATEGORY FORM
GENERAL PROCESS OPERATION

This form is to be completed for each process operation when there is no specific emissions activity category (EAC) form applicable. If there is more than one end product for this process, copy and complete this form for each additional product (see instructions). Several State/Federal regulations which may apply to process operations are listed in the instructions. Note that there may be other regulations which apply to this emissions unit which are not included in this list.

1. Reason this form is being submitted (Check one)

☒ New Permit ☐ Renewal or Modification of Air Permit Number(s) (e.g. P001)_____

2. Maximum Operating Schedule: ___24___hours per day ;___7____days per year

   If the schedule is less than 24 hours/day or 365 days/year, what limits the schedule to less than maximum? See instructions for examples. _____

3. End product of this process: ***Recyclable Metals***

4. Hourly production rates (indicate appropriate units). Please see the instructions for clarification of "Maximum" and "Average" for new versus existing operations:

Hourly	Rate	Units (e.g., widgets)
Average production	***1,000***	***Airbag Inflators***
Maximum production	***3,000***	***Airbag Inflators***

5. Annual production rates (indicate appropriate units) Please see the instructions for clarification of "Maximum" and "Actual" for new versus existing operations:

Annual	Rate	Units (e.g., widgets)
Actual production	***2,190,000***	***Airbag Inflators***
Maximum production	***26,280,000***	***Airbag Inflators***

6. Type of operation (please check one):

☒ Continuous
☐ Batch (please complete items below)

Minimum cycle* time (minutes): _____
Minimum time between cycles (minutes): _____
Maximum number of cycles per daily 24 hour period: _____
(Note: include cycle time and set up/clean up time.)

*"Cycle" refers to the time the equipment is in operation.

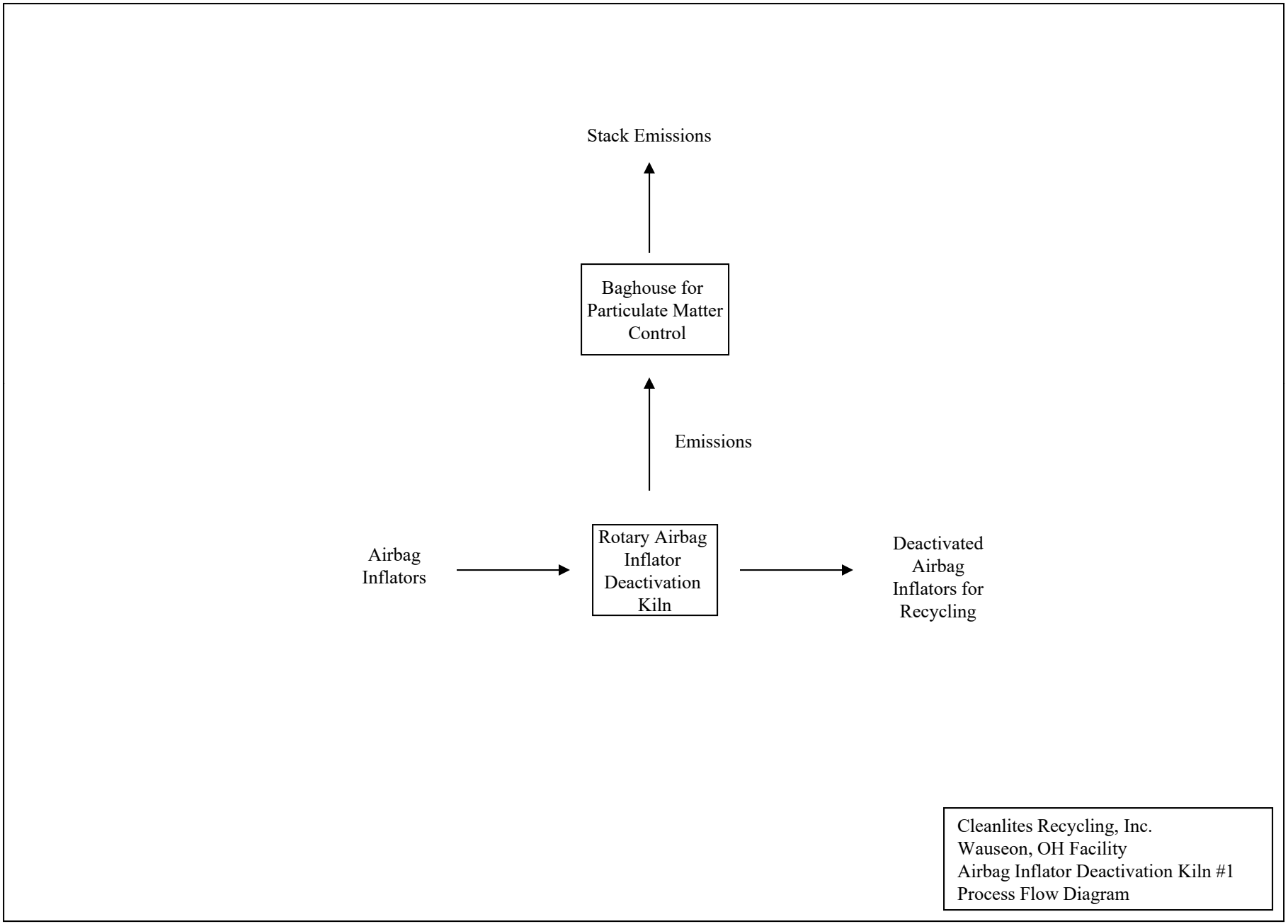
7. Materials used in process at maximum hourly production rate (add rows/pages as needed):

Material	Physical State at Standard Conditions	Principle Use	Amount**
Airbag Inflators	***Solid***	***Process Input***	***3000 Airbag Inflators/hr***

** Please indicate the amount **and** rate (e.g., lbs/hr, gallons/hr, lbs/cycle, etc.).

8. Please provide a narrative description of the process below (e.g., coating of metal parts using high VOC content coatings for the manufacture of widgets; emissions controlled by thermal oxidizer...):

Airbag inflators are continuously fed into a rotary kiln and heated to a temperature (600 °C) adequate for deactivation. The deactivated airbag inflators are recycled for scrap metal.


Stack Emissions
Baghouse for Particulate Matter Control
Emissions
Airbag Inflators
Rotary Airbag Inflator Deactivation Kiln
Deactivated Airbag Inflators for Recycling
Cleanlites Recycling, Inc.
Wauseon, OH Facility
Airbag Inflator Deactivation Kiln #1
Process Flow Diagram

Airbag Inflator Deactivation Kiln Potential Emissions Estimates
PTIO Application
Cleanlites Recycling, Inc.
PN: 5082-18-001 by BRG/CJM 9/14/2018

Operational Data:

Maximum Units per Hour	3,000
Maximum Units per Year	26,280,000
Quantity of Gas Produced (mol/unit)	4.00
Quantity of Gas Produced (scf/unit)	3.46

Pass-Through Emissions:

Pollutant		Effluent Concentration (ppmv)[a]	Molecular Weight (g/mol)	Amount per Unit (mol/unit)	Amount per Unit (g/unit)	Amount per Unit (lb/unit)	Potential Emission Rate (lb/hr)	Potential Emission Rate (tons/yr)
CO		690.6	28.01	2.76E-03	0.08	1.70E-04	0.51	2.24
H2S[b]		15.0	34.08	6.00E-05	2.04E-03	4.50E-06	0.01	0.06
NH3		282.9	17.03	1.13E-03	0.02	4.25E-05	0.13	0.56
NO		86.6	30.01	3.46E-04	0.01	2.29E-05	0.07	0.30
NO2		17.55	46.01	7.02E-05	3.23E-03	7.12E-06	0.02	0.09
NOx (NO + NO2)				4.16E-04	0.01	3.00E-05	0.09	0.39
PM		220.5 mg/m3			0.02	4.76E-05	0.14	0.63
SO2		5.0	64.07	2.00E-05	1.28E-03	2.82E-06	8.47E-03	0.04
OC/VOC	Acetylene[b]	17.0	26.04	6.80E-05	1.77E-03	3.90E-06	0.01	0.05
	Benzene[b]	22.5	78.11	9.00E-05	7.03E-03	1.55E-05	0.05	0.20
	Ethylene[b]	2.0	28.05	8.00E-06	2.24E-04	4.94E-07	1.48E-03	6.50E-03
	Formaldehyde[b]	2.0	30.03	8.00E-06	2.40E-04	5.29E-07	1.59E-03	6.95E-03
	Phosgene[b]	0.3	98.92	1.20E-06	1.19E-04	2.62E-07	7.85E-04	3.44E-03
	Total						0.06	0.27
HAPs	Benzene[b]	22.5	78.11	9.00E-05	7.03E-03	1.55E-05	0.05	0.20
	HCN	4.7	27.03	1.88E-05	5.08E-04	1.12E-06	3.36E-03	0.01
	HCl	5.0	36.46	2.00E-05	7.29E-04	1.61E-06	4.82E-03	0.02
	Formaldehyde[b]	2.0	30.03	8.00E-06	2.40E-04	5.29E-07	1.59E-03	6.95E-03
	Phosgene[b]	0.3	98.92	1.20E-06	1.19E-04	2.62E-07	7.85E-04	3.44E-03
	Chlorine	1.0	70.90	4.00E-06	2.84E-04	6.25E-07	1.87E-03	8.21E-03
	Total						0.06	0.26

[a]Units of ppmv, unless otherwise indicated. Concentrations based on the greater of the maximum tested value times a safety factor of 1.5 and the vehicle limit except acetylene and ethylene, which had maximum tested values significantly below the vehicle limit. The concentrations used for acetylene and ethylene were 10 times the maximum tested value.

[b]Will be partially destroyed in kiln, but have been included for conservative estimation purposes.

Airbag Inflator Deactivation Kiln Potential Emissions Estimates
PTIO Application
Cleanlites Recycling, Inc.
PN: 5082-18-001 by BRG/CJM 9/14/2018

Combustible Gas Heat Input:

Pollutant	Effluent Concentration (ppmv)[a]	Volume (scf/hr)	Heat Content (BTU/scf)	Heat Input (mmBTU/hr)
Acetylene	17.0	0.18	1,470	2.59E-04
Benzene	22.5	0.23	3,741	8.73E-04
Ethylene	2.0	0.02	1,631	3.38E-05
Formaldehyde	2.0	0.02	626	1.30E-05
Methane	221.0	2.29	1,012	2.32E-03
Phosgene	0.3	3.11E-03	119	3.71E-07
Total			**1,274**	**3.50E-03**

[a]Concentrations based on the greater of the maximum tested value times a safety factor of 1.5 and the vehicle limit except acetylene, ethylene, and methane, which had maximum tested values significantly below the vehicle limit. The concentrations used for acetylene, ethylene, and methane were 10 times the maximum tested value.

Combustion Emissions:

CO Emission Factor (lb/mmBTU)	0.082	AP-42 Section 1.4, Table 1.4-1 (7/98). Combustion emissions assumed similar to those from natural gas combustion because methane accounts for over 83% of the combustible gas concentration.
NOx Emission Factor (lb/mmBTU)	0.098	
CO Emissions (lb/hr)	2.88E-04	
CO Emissions (tons/yr)	1.26E-03	
NOx Emissions (lb/hr)	3.43E-04	
NOx Emissions (tons/yr)	1.50E-03	

Total Potential Emissions:

Pollutant	Potential Emission Rate (lb/hr)	Potential Emission Rate (lb/day)	Potential Emission Rate (tons/yr)
CO	0.51	12.28	2.24
H2S	0.01	0.32	0.06
NH3	0.13	3.06	0.56
NOx	0.09	2.17	0.40
OC/VOC	0.06	1.49	0.27
PM	0.14	3.43	0.63
SO2	8.47E-03	0.20	0.04
Total HAPs	0.06	1.41	0.26

Airbag Inflator Effluent Gas Analysis

Effluent Gases ppm except were noted	Mean Value	Std Deviation	Minimum	Maximum	Analytical Method	Method of Detection	Maximum Value % of Vehicle Limit	Vehicle Level Limit (Maximum ppm)
CO Carbon Monoxide	453.0	N/A	446.3	460.4		FTIR	99.9	461
NO2 Nitroger Dioxide	10.1	N/A	9.1	11.7		FTIR	234.9	5.0
NO Nitric Oxide	57.3	N/A	57.0	57.7		FTIR	77.0	75.0
NH3 Ammonia	187.1	N/A	184.7	188.6		FTIR	538.8	35.0
H2S Hydrogen Sulfide	-	-	-	-		-	-	15.0
C3H6 Eenzene	0.0	N/A	0.0	0.0		FTIR	0.0	22.5
HCN Hydrocyanic Acid	0.3	N/A	0.0	0.6		FTIR	12.8	4.7
HCl Hdrochloric Acid	0.1	N/A	0.0	0.2		FTIR	0.0	5.0
HCHO Formaldehyde	0.0	N/A	0.0	0.0		FTIR	0.0	2.0
COCl2 Phosgene	0.0	N/A	0.0	0.0		FTIR	0.0	0.3
SO2 Sulfur Dioxide	0.1	N/A	0.1	0.1		FTIR	0.0	5.0
CO2 Carbon Dioxice	2577.6	N/A	2475.4	2650.3		FTIR	8.8	30000
C2 Chlorine	-	-	-	-		-	-	1.0
C2H2 Acetylene	1.5	N/A	1.4	1.7		FTIR	0.0	25000
C2H4 Ethylere	0.1	N/A	0.0	0.2		FTIR	0.0	27000
CH4 Methane	21.2	N/A	20.7	22.1		FTIR	0.0	50000
Hydrogen	-	-	-	-		-	-	40000
Total Airborne Particulate mg/m3	127	N/A	95	147		N/A	117.6	125.0
Total <10 Micron particulate mg/m3	-	-	-	-		-	-	Report Only
Water Soluble Particulates mg/m3	-	-	-	-		-	-	75.0
Water Insoluble Particulates mg/m3	-	-	-	-		-	-	50.0
KClO4 as Perchlorate mg/m3	ND	N/A	ND	ND		-	-	Report Only
NaN3 Sodium Azide mg/m3	N/A	N/A	N/A	N/A		-	-	1.43

Ohio Environmental Protection Agency

Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

2/7/2019

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mike Kimmel
USA Lamp & Ballast Recycling, Inc.
P.O. Box 212
Mason, MI 48854

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0326002034
Permit Number: P0125067
Permit Type: Initial Installation
County: Fulton

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Robert Sprague," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
30 East Broad Street, 4th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

cc: Ohio EPA-NWDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
USA Lamp & Ballast Recycling, Inc.

Facility ID:	0326002034
Permit Number:	P0125067
Permit Type:	Initial Installation
Issued:	2/7/2019
Effective:	2/7/2019
Expiration:	2/7/2029

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
USA Lamp & Ballast Recycling, Inc.

Table of Contents

Authorization

Facility ID:	0326002034
Application Number(s):	A0061726
Permit Number:	P0125067
Permit Description:	Airbag deflator kiln #1.
Permit Type:	Initial Installation
Permit Fee:	$500.00
Issue Date:	2/7/2019
Effective Date:	2/7/2019
Expiration Date:	2/7/2029

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

USA Lamp & Ballast Recycling, Inc.
715 W. Linfoot Street
Wauseon, OH 43567

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Rd.
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Laurie A. Stevenson
Director

Authorization (continued)

Permit Number: P0125067
Permit Description: Airbag deflator kiln #1.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P001**
Company Equipment ID:	P001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the District Office or Local Air Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. P001, P001

Operations, Property and/or Equipment Description:

Electronic Airbag Deactivation System #1

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)b., b)(1)f., b)(2)b., d)(1) through d)(4), and e)(2).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June, 2008	Carbon Monoxide (CO) emissions shall not exceed 0.19 ton per month averaged over a 12-month rolling period See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, nitrogen oxides (NOx), Sulfur Dioxide (SO2), Volatile Organic Compounds (VOC), and particulate matter less than 10 microns in size (PM10)/particulate matter less than 2.5 microns in size (PM2.5) emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-18-06(E)	24.7 lbs SO2/hr See b)(2)f.
f.	OAC rule 3745-114-01 ORC rule 3704.03(F)	See d)(1) through d)(4) and e)(2)
g.	40 CFR, Part 63, Subpart EEE	See b)(2)g.

(2) Additional Terms and Conditions

a. This BAT emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County pursuant to OAC rule 3745-17-11(A)(2)(b)(ii).

e. In order to ensure the source continues to operate as designed; the permittee shall operate this emissions unit in accordance with manufacturer's recommendations and shall follow the manufacturer's recommended maintenance, at the recommended intervals. The permittee shall keep a record of the maintenance on this emissions unit along with manufacturer's recommendations.

f. The potential to emit for this emissions unit (under its physical and operational design) is 0.008 lb SO2/hr & 0.04 tons/yr and is based on a company supplied emission factor of 0.00000282 lb SO2/air bag unit* and a maximum air bag capacity rate of 3,000 air bags/hr.

g. The electronic airbag deactivation system is not an affected source (i.e. hazardous waste combustor) under 40 CFR, Part 63, Subpart EEE and therefore is not subject to the regulations under the subpart. The permittee is advised that the electronic airbag deactivation system may be subject to regulations under the Resource Conservation and Recovery Act (RCRA).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permit-to-install and operate (PTIO) application for this emissions unit, P001, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for toxic compounds with an A1 classification in the American Conference of Governmental Hygienists (ACGIH) using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the ACGIH "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., 24 hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/24 \times 5/7 = 4\ TLV/(24 \times 7) = MAGLC$$

d. The following summarizes the results of air dispersion modeling for toxic compounds with an A1 classification in the ACGIH:

Toxic Contaminant: Formaldehyde

TLV (mg/m3): 0.12

Maximum Hourly Emission Rate (lbs/hr): 0.00159

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.05

MAGLC (ug/m3): 2.92

Toxic Contaminant: Benzene

TLV (mg/m3): 1.6

Maximum Hourly Emission Rate (lbs/hr): 0.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.45

MAGLC (ug/m3): 38.03

The permittee has demonstrated that emissions of Formaldehyde and Benzene, from emissions unit P001, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(2) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change.

The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(3) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(4) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.

(3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
CO emissions shall not exceed 0.19 ton per month averaged over a 12-month rolling period

Applicable Compliance Method:
The emission limitation represents the potential to emit for this emissions unit and was established by multiplying a company supplied emission factor of 0.00017 lb CO/unit* by a maximum rated unit capacity of 3000 units/hr, a maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton and 12-months per rolling period. Therefore, no monitoring, recordkeeping or reporting requirements are necessary to demonstrate compliance with this emission limit.

*The emission factor is derived from testing of the effluent gas from the airbag inflators as provided in Permit-to-Install/Operate (PTIO) application A0061726 received on September 17, 2018.

b. Emission Limitation:
24.7 lbs SO2/hr

Applicable Compliance Method:
The potential to emit for this emissions unit (under its physical and operational design) is 0.008 lb SO2/hr and is based on a company supplied emission factor of 0.00000282 lb SO2/air bag unit* and a maximum air bag capacity rate of 3,000 air bags/hr.

*The emission factor is derived from testing of the effluent gas from the airbag inflators as provided in PTIO application A0061726 received on September 17, 2018.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

PART B Permit Application

SUBSECTION M - List of Effective Pages

USA Lamp & Ballast Recycling, Inc.
715 West Linfoot St.
Wauseon, OH 43567

Tab	Subsection	Paragraph	Modification	Date	Comments