

US EPA ARCHIVE DOCUMENT

**Application for Permit to Store PCBs and
PCB Containing Items for Disposal**

for

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

Mason, MI 48854

MIR000016402

March, 2016

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EPA Form 7710-53 (Rev. 3/08) Notification of PCB Activity

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**Application for Permit Modification to Store
PCBs and PCB Containing Items for Disposal
USA Lamp & Ballast Recycling, Inc. dba Cleanlites, Inc.
Mason, Michigan**

Introduction

Under the provisions of 40 CFR 761.65, USA Lamp & Ballast Recycling, Inc., dba Cleanlites Recycling, Inc. (Cleanlites) requests a permit to store PCBs and/or PCB containing items at a facility located at 665 Hull Road, Mason, MI 48854 (See Locator Map – Figure 1). An aerial photograph of the site may be found at Figure 2 and a plot plan of the site at Figure 3.

Cleanlites is an environmental recycling firm that accepts Universal Waste for processing to make them more amenable for recycle. Items are sorted, disassembled, and repackaged to be sent to final recycling companies. Lamps are processed through a lamp crusher that separates the metal, glass, and powdered components for shipment to recycling facilities. The facility operates no on-site waste treatment.

Cleanlites is owned by Mr. Harland Drumm and Mr. Thomas Kimmel each having a 50% interest in the company.

Cleanlites is currently licensed as a PCB Transporter under their EPA Identification Number MIR000016402. It is the purpose of this application to modify the permit to enable Cleanlites to store PCB and/or PCB Containing materials at the Mason facility.

The purpose of proposed storage unit is to accumulate truck load quantities of 55 gallon drums of PCB containing items such as lighting ballasts received in smaller quantities from Cleanlites' customers. Cleanlites requires our clients to ship ballasts in one of three containers; 55 gallon, open head drums with closed lids, 5 gallon plastic drums with lids, or shrink-wrapped to a pallet. Upon receipt, the containers are visually inspected for any indication of leakage. Any container containing leaking ballasts is considered contaminated and the entire container is sent for disposal at a TSCA approved PCB disposal facility. Each ballast is removed from the received container and visually inspected for indications of leakage. The presence of an oily substance is an indication of PCB leakage. Wires and any other detachable parts are removed for recycle and the ballasts are repacked in clean 55 gallon, open head drums. Once full, the drum is closed, sealed, and moved to the storage unit. If a ballast is found to be leaking during this process, that ballast and the remainder of the container is considered to be contaminated, is resealed, and shipped to a TSCA approved PCB disposal facility. Cleanlites intends to arrange shipment of the PCB containing items to a permitted disposal facility as soon as a truck load (approximately forty-eight drums) is accumulated. The full drums are sent to a permitted PCB recycling facility where the items are separated into the constituent scrap metal and PCB capacitors and PCB-contaminated components. The scrap metal is recycled with local metals companies and the PCB capacitors and PCB-contaminated components are sent to an EPA approved incinerator for disposal. PCB items, found to be leaking or otherwise contaminated with PCB materials, following processing, will be segregated and placed in a non-leaking container with sufficient sorbent material to absorb any potential

liquid PCB leaking from the item. Any such containers will be shipped to an approved TSCA PCB disposal site. Empty containers resulting from the consolidation process will be visually inspected and, if there is evidence of PCB contamination, the container will be decontaminated in accordance with 40 CFR 761.79 and will be reused or disposed of properly. Any decontamination required will be done in accordance with 40 CFR 761.79(c). On June 11, 1997, Cleanlites submitted, to the State of Michigan, an application for a Hazardous Waste Identification Number for the facility. The application indicated that Cleanlites would be a Conditionally Exempt Small Quantity Generator (CESQG), a hazardous waste Transporter, and accumulate Universal Waste including batteries, thermostats, lamps, computer components and electronic components. Cleanlites was assigned the EPA ID #MIR000016402. On March 29, 1999, Cleanlites submitted a Notification of PCB Activity to the EPA. (See Appendix A) Cleanlites received an acknowledgement from EPA dated June 16, 1999, indicating that the above EPA ID number would be used to cover PCB activity. (See Appendix B)

Cleanlites understands that, under 40 CFR 761.65(a), this permit modification allows storage for disposal of PCBs at concentrations of 50 ppm or greater and PCB containing materials at concentrations of 50 ppm or greater for up to one year. Cleanlites also understands that an extension of up to one year may be granted if disposal cannot be accomplished within the initial one year period provided that the Regional Administrator receives a written notification at least 30 days prior to the expiration of the initial one year period. This notification will identify the name of the storage facility, the type, volume and location of the waste, and the reason for failure to meet the initial one year limit.

It is also understood that additional extensions may be granted under conditions that are acceptable to the Regional Administrator.

Cleanlites does not intend to store liquid PCB waste, PCB/radioactive waste nor PCBs/PCB containing items for reuse.

Cleanlites does intend to store sealed PCB containing items such as lamp ballasts. These items will be stored in open head, 55 gallon drums with closed lids within the PCB Storage Unit or in the designated Temporary Storage Area.

All stored containers will meet the requirements of DOT Hazardous Materials Regulations (HMR) found in 49 CFR 171 through 180.

For the purposes of this application the term "Approving Authority" shall mean the EPA Regional Administrator or the Director, National Program Chemicals Division.

The following information is submitted in support of this application and in accordance with the requirements of 40 CFR 761.65.

PCB Storage Unit – 761.65(b)

The PCB storage unit will consist of a 29'3"X5'6"X9'7" prefabricated hazardous waste storage building, model number 12PC, manufactured by Safety Storage. Details and specifications for this building, as well as a photograph, are shown in Appendix C. A diagram showing the location of the PCB storage unit with respect to the main building may be found at Figure 4. The prefabricated building provides adequate protection to

prevent rain from reaching the stored PCB containing items. In addition to the building's internal storage the unit is located on a curbed concrete slab with no open drains.

The PCB storage unit secondary containment is designed to contain 25% of the total volume of all PCB articles stored. The unit has a maximum storage capacity of 48 drums at 55 gallons each. The bottom rack will hold 24 drums and the top rack will hold 24 drums. The unit has a built in containment sump with a capacity of 450 gallons. This is sufficient to contain more than 25% of the volume contained on the bottom rack.

$$24 \text{ drums} \times 55 \text{ gal/drum} \times 25\% = 330 \text{ gallons}$$

Drums stored on the top rack will be stored on spill containing pallets similar to the UltraTech Ultra-Spill Pallet P4 Nestable Model also shown in Appendix C. This pallet has a containment volume of 66 gallons. The containment requirement for these 24 drums is the same as the lower rack or 330 gallons. There is room for six pallets on the top rack.

$$6 \text{ pallets} \times 66 \text{ gal/pallet} = 390 \text{ gal}$$

The storage capacity exceeds the requirement.

Spill containing pallets may also be used on the lower rack for ease of clean-up should a spill occur.

Though no spills are expected from the types of items Cleanlites intends to store, any spillage of PCBs or PCB containing items will be cleaned up in accordance with the PCB Spill Cleanup Policy found in 40 CFR 761 Subpart G.

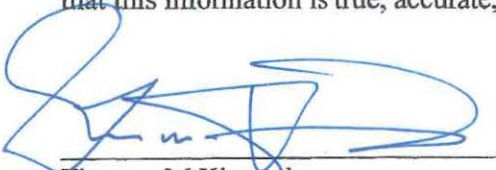
All PCB containing items stored in this area will be in open head, 55 gallon drums with closed lids. All containers stored in the PCB Storage Unit will be checked for leaks at least every weekly.

The PCB Storage Unit and each drum containing PCB items will be marked as required by 40 CFR 761.40. Examples of proper marking are found in Appendix D.

The entire Cleanlites facility is well above the 100 year flood water elevation. Flood Plain and Topographic Maps may be found at Appendix E.

Certification of Compliance With Storage Standards – 761.65(d)(3)(vii)

Under civil and criminal penalties of law for making or submission of false statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete to the best of my knowledge and belief. As to the identified sections of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instruction, made the verification that this information is true, accurate, and complete.



 Thomas M Kimmel

President 4-11-16

 Title/Position Date

Qualification of Applicant – 761.65(d)(3)(i-v)

The following information is submitted in support of Cleanlites' principals and key employees who are engaged in the business of commercial storage of PCB waste.

Mr. Harland Drumm, CEO (Non-participating)

8B Grove Street
Minneapolis, MN 55401
Home Phone (612) 747-0146

Mr. Drumm is an investor in Cleanlites but does not take part in the day-to-day activities of the company. Though he will have no direct contact with the PCB waste storage facility, Mr. Drumm has been a principal in a number of waste handling and recycling companies. A list of those companies may be found at Appendix F of this application.

None of the companies with which Mr. Drumm has been associated have been cited with any State or Federal Environmental violations.

Mr. Thomas M. Kimmel

4374 Brogan Road
Stockbridge, MI 49285
Office Phone (517) 676-0044
SC Office Phone (864) 579-4800

Mr. Kimmel is the corporate operations manager for Cleanlites. He has a great deal of experience in running waste handling and recycling operations. Mr. Kimmel's resume may be found at Appendix G of this application. His experience includes both owning and operating numerous waste handling and recycling facilities. A list of those companies may be found at Appendix H of this application.

None of the companies with which Mr. Kimmel has been associated have been cited with any State or Federal Environmental violations.

Mr. Michael Kimmel, Senior Vice President

2650 Baseline Road
Stockbridge, MI 49285
Office Phone (517) 676-0044
Mobile Phone (517) 204-7111

Mr. Mike Kimmel has more than 15 years of operations, logistics, and supervisory experience in the construction and recycling field. He has extensive knowledge of the universal waste recycling and transportation procedures, rules, and regulations and is a recognized expert in battery determination procedures. Mike is responsible, along with Tom Kimmel, for establishing and maintaining the necessary permits, licenses, approvals, and training for all of the USA Lamp / Cleanlites facilities and works closely with national, state, and local regulators. Mike facilitates lamp processing machine upgrades, improvements, and maintenance for all facilities. The facilities operated by Mr. Kimmel are:

USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc.
665 Hull Road
Mason, MI

None of the companies with which Mr. Kimmel has been associated have been cited with any State or Federal Environmental violations.

Capacity of Facility – 761.65(d)(3)(vi)

The PCB Storage Unit is designed to contain a maximum of forty-eight (48) 55 gallon drums. (See Appendix C) The average weight of each drum will be 800 pounds with a maximum drum weight of 950 pounds. This represents a total maximum storage capacity of 45,600 pounds of PCB containing items.

The PCB Temporary Storage area is designed for a maximum of ten (10) 55 gallon drums. (See Figure 4) The average weight of each drum will be 800 pounds with a maximum drum weight of 950 pounds. This represents an additional 8,000 pounds of PCB containing items.

The total design maximum capacity of the facility is 53,000 pounds.

Written Closure Plan – 761.65(e)

Cleanlites has prepared a written Closure Plan that identifies the steps that will be taken to close the PCB Storage Unit in a manner that eliminates the potential for post-closure releases of PCBs which may present an unreasonable risk to human health or the environment. A copy of the Closure Plan may be found at Appendix K to this application.

Cleanlites understands that upon approval of this application this Closure Plan will become a condition of the PCB Storage Permit.

Cleanlites does not currently operate a PCB storage facility or a PCB disposal facility that is covered by a TSCA or RCRA approved permit.

Cleanlites understands that the Closure Plan must be amended in the event of any of the following events.

1. Change in ownership, operating plans, or facility design that affects the closure plan.
2. Change in the facility's expected date of closure.
3. Unexpected events that may occur during closure activities that require modification of the approved Closure Plan.

Cleanlites understands that the Approving Authority may make modifications to the Closure Plan if any of the above conditions occurs.

Closure of the PCB Storage Unit will be conducted in accordance with the schedule found in Appendix J and contained in the Closure Plan (Appendix J).

Within sixty (60) days of the completion of closure, Cleanlites will submit to the Approving Authority a certification that the PCB Storage unit has been closed in accordance with the approved Closure Plan. This certification will be signed by the owner and an independent Registered Professional Engineer and will be sent by registered mail. It is estimated that the facility will have an active life of ten (10) years.

Closure Cost Estimate - 761.65(f)

Cleanlites has prepared a detailed cost estimate, in current dollars, for the closure of the PCB Storage Unit in accordance with the approved Closure Plan. This estimate and certification may be found in Table 1 of this application. In addition, a letter, concurring with the cost estimate in Table 1, from J & J Contracting, LLC-MN may be found

The closure cost estimate is based upon the point in the storage facility's active life when the extent and manner of PCB storage operations would maximize closure costs.

The closure cost estimate is also based on the use of an outside, third party contractor that is not affiliated in any way with the owner or operator of the facility.

As no on-site disposal capacity exists at the site, the closure cost estimate is based on current market costs for off-site commercial disposal.

The closure cost estimate does not include salvage value that may be realized from the sale of wastes, facility structures or equipment, land, or other assets associated with the facility at the time of closure.

Cleanlites will adjust the Closure Cost Estimate on an annual basis. This adjustment will be made at least 60 days prior to the anniversary date of the establishment of the financial instruments used to demonstrate financial responsibility for closure.

If the Closure Plan is modified such that the cost of closure increases, Cleanlites will adjust the Closure Cost Estimate to reflect the modification within 30 days of the approval of the modified plan by the Approving Authority.

A copy of the current Closure Cost Estimate will be kept at the facility at all times during the life of the PCB Storage Unit.

Demonstration of Financial Responsibility - 761.65(g)

Cleanlites will establish a Closure Trust Fund as a demonstration of financial responsibility. The expected life of the PCB Storage Unit is expected to exceed three (3) years, therefore Cleanlites will utilize a three (3) year "pay-in period."

At a minimum the first installment will consist of one third of the initial, estimated closure cost and will be made before final EPA approval of this application and before the facility accepts the first shipment of PCB containing items for commercial storage.

Cleanlites understands that failure to meet this payment date will result in cancellation of the conditional approval and denial of the permit application.

Subsequent payments will be made within 30 days after the anniversary date of the first payment. The amount of these payments will be calculated by subtracting the amount in the trust fund from the adjusted (then current) closure cost estimate and dividing the result by the number of years left in the "pay-in period."

Additional payments to the trust fund will be made if the current closure cost estimate exceeds the value of the trust fund.

A copy of the Trust Fund Agreement with the wording specified in 40 CFR 264.151(a)(1) will be submitted to the Approving Authority as evidence of financial responsibility.

Evaluation of Risk

The PCB Containing Items that Cleanlites intends to store are generally sealed lamp ballasts and the probability of leakage, spillage, or breakage of the item is very low.

Personnel handling the PCB containing items will be trained in the proper handling of PCB containing items and in proper procedures for cleaning up a spill involving PCB containing items.

PCB containing items will be stored within the containment building show in Appendix 4 and are not likely to contaminate additional area if spilled.

The PCB Storage Unit is designed to contain any spilled material will not migrate outside of the structure.

The facility is located in a rural industrial park and if PCB materials were spilled outside of the PCB Storage Unit no adverse effects would result before cleanup operations were initiated and completed.

The proposed Cleanlites PCB Storage facility poses no unreasonable risk of injury to health or the environment.

Environmental Compliance History

The Owners, Partners, Officers, or Key Employees of Cleanlites have never been associated with any company that has been cited for violations of Federal Environmental Laws, Rules, or Regulations.

Records and Monitoring – Section 760.180

In accordance with the requirements of 40 CFR 761.180(b), Cleanlites will maintain annual records on the disposition of all PCBs and PCB items and, by July 1 of each year, will prepare a written, annual document log for all PCB activity during the previous calendar year. In addition, by July 15 of each year, Cleanlites will submit to the EPA a written

annual report. This report will be submitted each year until storage activities are discontinued and all PCB containing articles have been shipped off-site. Cleanlites is also required to retain other documentation relative to the permit to store PCB Containing Articles.

The Annual Record will include copies of the following documents.

- All signed manifests / BOLs received by the facility during the calendar year.
- All signed manifests / BOLs generated by the facility during the calendar year.
- All Certificates of Disposal received by the facility during the calendar year.
- All Certificates of Disposal generated by the facility during the calendar year.
- All records of inspections and cleanups performed in accordance with 40 CFR.65(c)(5).

Annual records will be maintained at the facility for at least three (3) years after the facility is no longer used to store PCBs or PCB items. The annual record will be available at the facility for inspection by authorized representatives of the EPA.

The Annual Document Log will contain the following information.

- Name of the facility (USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc.)
- Address of the facility
- EPA Identification Number
- Calendar year covered by the annual document log

In addition, for each manifest / BOL received or generated by Cleanlites, the following information will be recorded in the annual document log.

- The unique manifest / BOL number.
- Name and address of the facility that generated the manifest / BOL.
- Unique number assigned by the generator to each PCB Article Container.
- Description of the contents of each Container.
- The total weight in kilograms of the PCB waste in each Container.
- The first date a PCB Article was placed into the container. If this is not known the date that the container was shipped to Cleanlites will be used.
- The date each Container was received by Cleanlites.
- The date each Container was placed in transport to the disposal facility.
- The date of disposal of each Container (if known). The date on the returned copy of the manifest / BOL will be used if the disposal date is unknown.

The Annual Document Log will be maintained at the facility for at least three (3) years after the facility is no longer used to store PCBs or PCB items. The Annual Document Log will be available at the facility for inspection by authorized representatives of the EPA.

The Annual Report will contain the following information.

- Name of the facility (USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc.)
- Address of the facility
- EPA Identification Number
- Calendar year covered by the annual report.
- The total weight, in kilograms, of PCB waste in PCB Article Containers in storage at the beginning of the calendar year covered by the report.
- The total weight, in kilograms, of PCB waste in PCB Article Containers received or generated during the calendar year covered by the report.
- The total weight, in kilograms, of PCB waste in PCB Article Containers transferred to another facility the calendar year covered by the report.
- The total weight, in kilograms, of PCB waste in PCB Article Containers in storage at the end of the calendar year covered by the report.
- The total number of PCB Article Containers in storage at the beginning of the calendar year covered by the report.
- The total number of PCB Article Containers received or generated during the calendar year covered by the report.
- The total number of PCB Article Containers transferred to another facility the calendar year covered by the report.
- The total number of PCB Article Containers in storage at the end of the calendar year covered by the report.

Copies of the Annual Reports will be maintained at the facility for at least three (3) years after the facility is no longer used to store PCBs or PCB items. The Annual Reports will be available at the facility for inspection by authorized representatives of the EPA.

In addition to the above documentation, Cleanlites will collect and maintain the following documentation.

- All documentation, correspondence, and data that have been provided to Cleanlites by any State or local government agency and that pertain to the storage of PCB containing items.
- Any applications and related correspondence sent by Cleanlites to any local, State, or Federal authority in regard to wastewater discharge permits, solid waste permits, building permits, and other permits and authorizations.

Copies of the above documentation will be maintained at the facility for at least three (3) years after the facility is no longer used to store PCBs or PCB items and will be available at the facility for inspection by authorized representatives of the EPA.

Cleanlites does not intend to perform any reclassification of electrical equipment.

Training

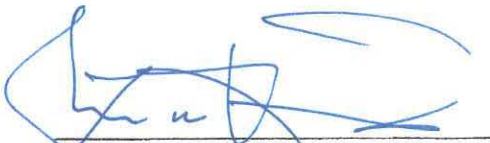
Cleanlites is registered as a Transporter of Hazardous under EPA ID # MIR000016402 and as such is required to conduct personnel training as required by 40 CFR 264.16. In addition to the required training under the Resource Conservation and Recovery Act (RCRA), Cleanlites will conduct training relative to the proper handling of PCB containing items and training specific to PCB decontamination as required by 40 CFR 761.120, and the Spill Cleanup Plan found in Attachment 1 of the Closure Plan in Appendix J. Current training requirements for Cleanlites Recycling employees may be found in Appendix L. In addition, those employees assigned to ballast repackaging will receive specific training to include Identification of PCB Containing Ballasts, Proper Handling of PCB Containing Ballasts During Repackaging, Identification of Leaking PCB Ballasts, and Proper Reporting and Handling of Leaking PCB Containing Ballasts and Procedures for Decontamination of Leaking PCB Ballasts. Additionally, web based training sites such as www.epa.gov, www.osha.gov, www.tsc.gov, www.ehso.com/pcbH&S.htm may be used as needed.

Table 1 Closure Cost Calculation

Activity	Unit Cost	Unit	Number of Units	Activity Cost
Mobilization	\$500.00	per event	1	\$500.00
Ship PCB waste				
Supervision	\$45.00	per man-hour	8	\$360.00
Labor	\$35.00	per man-hour	8	\$280.00
Shipping & disposal	\$195.00	per drum	58	\$11,310.00
Cleanup and decontamination				
Supervision	\$45.00	per man-hour	8	\$360.00
Labor	\$35.00	per man-hour	8	\$280.00
Shipping & disposal	\$490.00		1	\$490.00
Analytical	\$40.00	Sampling	42	\$1,680.00
	\$150.00	Testing	42	\$6,300.00
Certification	\$2,000.00	per event	1	\$2,000.00
Subtotal				\$23,560.00
Miscellaneous and Contingency	20%			\$4,712.00
TOTAL				\$28,272.00

Certification of Closure Cost Calculation

Under civil and criminal penalties of law for making or submission of false statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying the above Closure Cost Calculation is true, accurate, and complete to the best of my knowledge and belief. As to the identified sections of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instruction, made the verification that this information is true, accurate, and complete.



Thomas M Kimmel

President

Title/Position

4-11-16

Date



J & J Contracting, LLC-MN
573 Shoreview Park Road
Shoreview, MN 55126
Phone (651) 379-2791 Fax (651) 287-2373



To whom this may concern

Upon review of USA Lamp & Ballast Recycling's closure cost calculations, we believe that the proposed amount will be adequate to cover any spills that may occur from handling PCB material discussed in the application they have submitted.

Do to the nature of the material they are handling, we do not anticipate any spills and if a spill were to occur, it would be a minimum amount of oil resulting in a quick and efficient cleanup.

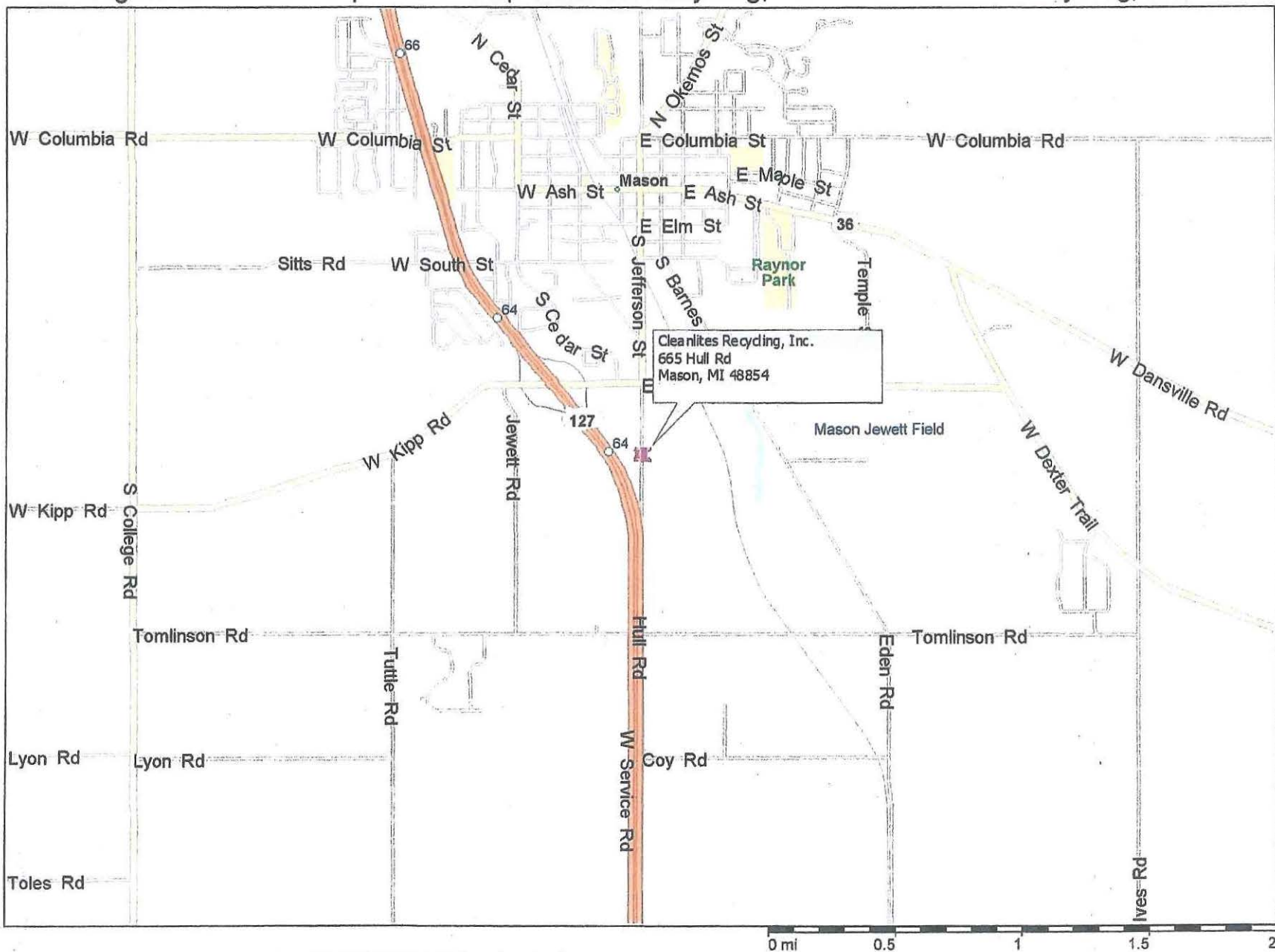
Thank you,

Steven Crist
Cell: 612-840-8827
Steve@JJContracting.com

Figure 1 Locator Map

US EPA ARCHIVE DOCUMENT

Figure 1. Locator Map - USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc.



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 Certain mapping and direction data © 2010 NAVTEQ. All rights reserved. The Data for areas of Canada includes information taken with permission from Canadian authorities, including: © Her Majesty the Queen in Right of Canada, © Queen's Printer for Ontario. NAVTEQ and NAVTEQ ON BOARD are trademarks of NAVTEQ. © 2010 Tele Atlas North America, Inc. All rights reserved. Tele Atlas and Tele Atlas North America are trademarks of Tele Atlas, Inc. © 2010 by Applied Geographic Systems. All rights reserved.

Figure 2 Aerial Photograph

Figure 2 Aerial Photograph

USA Lamp & Ballast Recycling, Inc
d.b.a. Cleanlites Recycling
MIR000016402
665 Hull Road, Mason, MI 48854



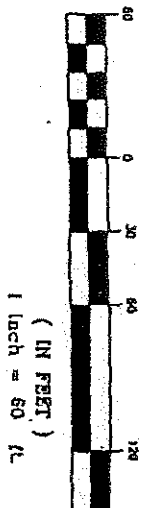
Figure 3. Plot Plan

US EPA ARCHIVE DOCUMENT

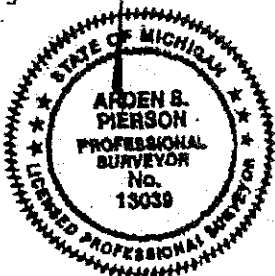
CERTIFIED SURVEY

A Port of the Northwest 1/4 of Section 16, T2N, R1W
 Vevay Township, Ingham County, Michigan

December 2012

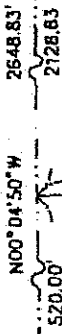


GRAPHIC SCALE

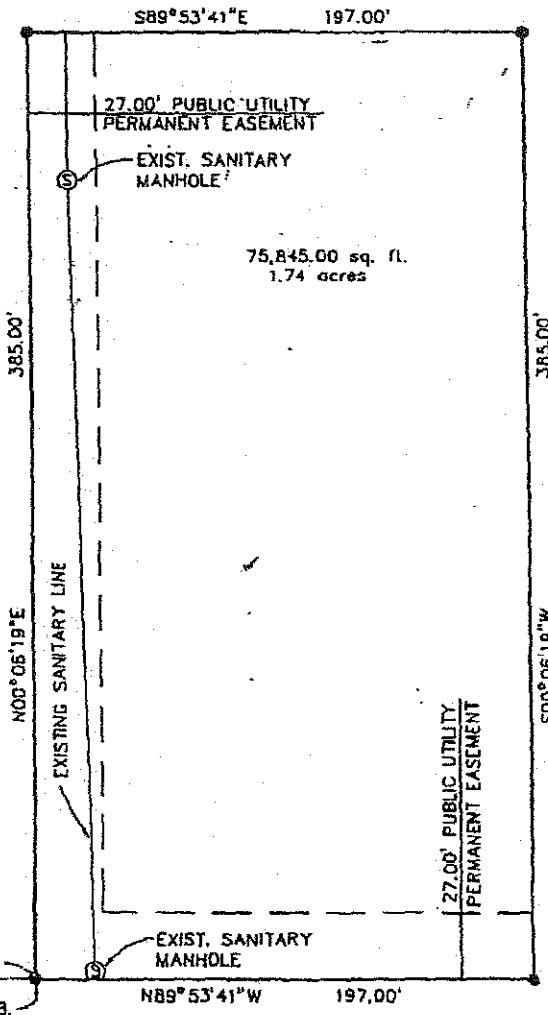


NW CORNER
 SECTION 16
 T2N, R1W
 VEVAY TOWNSHIP
 INGHAM CO., MI.

HULL ROAD



W 1/4 CORNER
 SECTION 16
 T2N, R1W
 VEVAY TOWNSHIP
 INGHAM CO., MI.



66.00' WIDE INGRESS & EGRESS EASEMENT
 (RETRACEMENT AND DIVISION OF A SURVEY
 BY LPS #27454, DATED JULY 17, 1992)

The undersigned hereby certifies that this map correctly represents a survey made under his supervision on the land above plotted and/or described on 6/11/1996 and that the ratio of closure on the unadjusted field observations of such survey was 1/ 5000 and that all of the requirements of P.A.132 of 1970 as amended, have been complied with.

Arden S. Pierson

Arden S. Pierson
 PROFESSIONAL SURVEYOR - MICHIGAN No. 13039

LEGEND.

- S.I.P. INDICATES SET IRON PIPE
- F.I.P. INDICATES FOUND IRON PIPE
- (m) MEASURED DISTANCE
- (r) RECORDED DISTANCE

CLIENT: T. A. FORSBERG	
edi engineering design inc. 100 South Ottawa St. St. Johns, Mich. 48879 Tele. 517-224-2355	
PROJECT No. 9646R	SCALE: 1" = 60
DATE: 6/11/1996	SHEET 1 OF 2

Figure 3 Plot Plan

Application for Permit Modification to Store PCB/PCB
 Containing Items for Disposal
 USA Lamp & Ballast Recycling, Inc. dba Cleanlites, Inc.

Figure 4 Cleanlites Facility Diagram

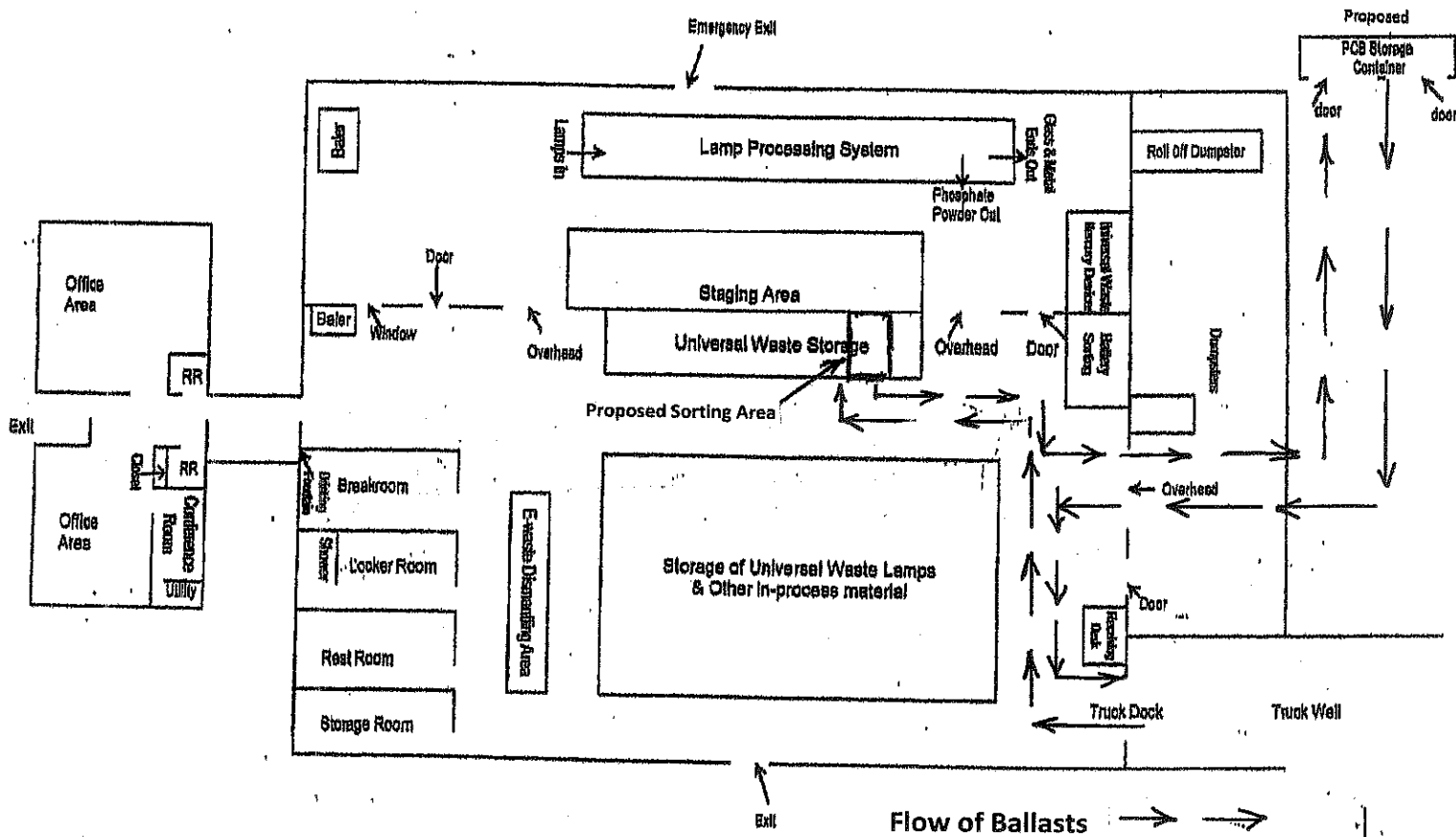


Figure 4 Cleanlites Facility Diagram

USA LAMP & BALLAST RECYCLING, INC
d.b.a. CLEANLITES RECYCLING
665 Hull Road, Mason, MI 48854
517.676.0044 phone / 517.676.4449 fax

PLANT LAYOUT

Appendix A Previous Notification of PCB Activity



Washington, DC 20460

Notification of PCB ActivityForm Approved
OMB No. 2070-0112
Approval expires 12-3**No information on this form may be claimed as TSCA CBI.**

Return To: Chemical Regulation Branch Office of Toxic Substances TS-798 U.S. Environmental Protection Agency 401 M St., SW Washington, DC 20460		For Official Use Only TSCA PCB ID Number
I. Name of Facility Cleanlites Recycling, Inc.	Name of Owner of Facility R-Pre Inc.	II. EPA Identification Number (if already assigned under RCRA) MIR000016402
III. Facility Mailing Address (Street or PO Box, City, State, & ZIP Code) Cleanlites Recycling, Inc. P.O. Box 212 Mason, MI 48854	IV. Location of Facility (No. & Street, City, State, & ZIP Code) Cleanlites Recycling, Inc. 665 Hull Rd. Mason, MI 48854	
V. Installation Contact (Name and Title) Thomas M. Kimmel	VI. Type of PCB Activity (Mark 'X' in appropriate box. See instruction.) <input type="checkbox"/> A. Generator with onsite storage facility <input type="checkbox"/> B. Storer (Commercial) <input checked="" type="checkbox"/> C. Transporter <input type="checkbox"/> D. Permitted Disposer	
Telephone Number (Area Code and Number) (517) 676-0044		
VII. Certification Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.		
Signature 	Name and Official Title (Type or print) Thomas M. Kimmel	Date Signed 3.29.99

Paperwork Reduction Act Notice

The public reporting burden for this collection of information is estimated to average 1.5 hours per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

Appendix B Previous EPA Acknowledgement

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

KIMMEL, THOMAS M.
CLEANLITES RECYCLING, INC.
PO BOX 212
MASON, MI 48854

(7404)
June 16, 1999
6353

Subject: Notification of PCB Activity

Thank you for filing the Notification of PCB Activity form dated March 29, 1999 for the facility location listed below:

CLEANLITES RECYCLING, INC.
665 HULL RD
MASON, MI 48854

Please be advised that the EPA Identification Number for the above facility is correctly stated on your form as MIR000016402. This is the number you will use for reporting PCB activity.

If you have any questions regarding the accuracy of the EPA ID number, please call (301) 294-2840. All other questions should be directed to the Fibers & Organics Branch at (202) 260-3933.

Sincerely,

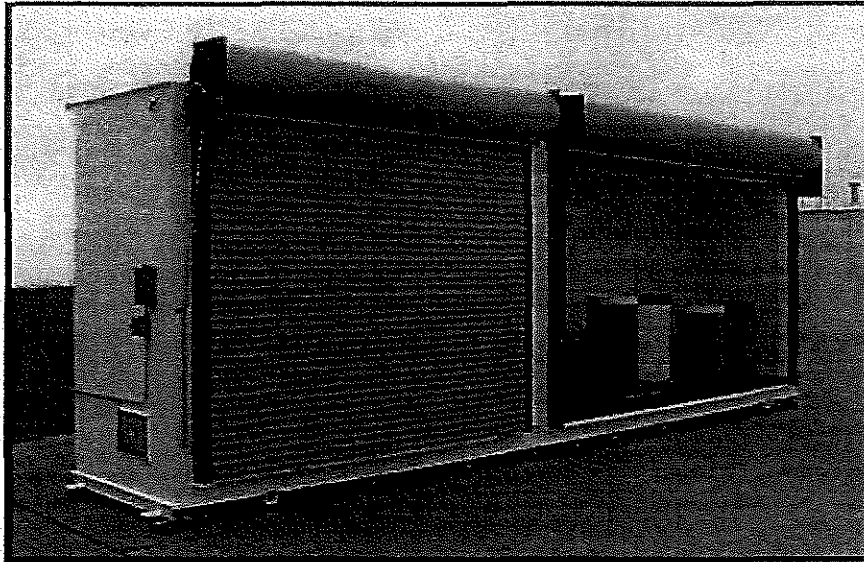
Tony Baney, Chief
Fibers & Organics Branch

RECEIVED
JUN 25 1999

Appendix C Storage Building

P-Series Pallet Storage

Spill Containment Storage Racks



Roll-up doors can be operated manually or can be motorized with remote access.

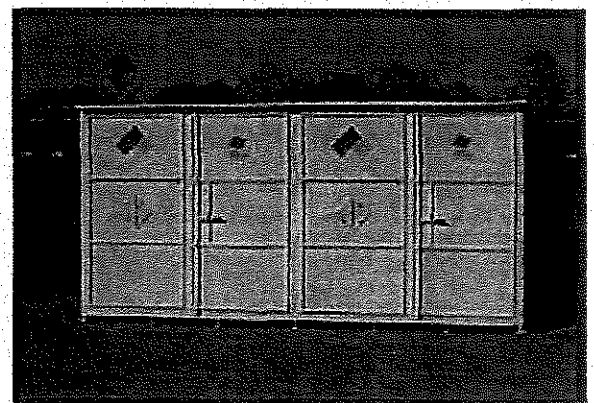
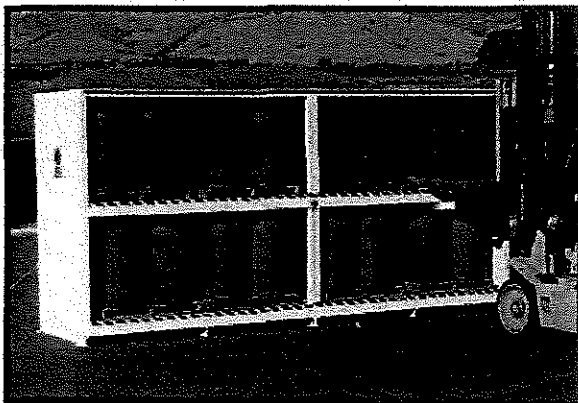
**Simplify your storage!
Store drums, containers and bulk materials on their pallets in a P-Series storage system.**

P-Series Cabinets from Safety Storage are the ideal solution for containment of palletized drums, IBC totes and other bulk materials. Outfit these cabinets for both storage and dispensing of hazardous, flammable, corrosive, or other controlled materials.

Store and inspect controlled materials inside the cabinet without entering the enclosure. Loading and extraction is easy via forklift or other material handling device

Optimize your storage space with a variety of door options: hinged, swinging, or roll-up doors. Models without doors are also available.

Select from a product line of models that store capacities from two (2) to thirty-six (36) loaded pallets. Other sizes and configurations are possible.



The P-Series system is designed for indoor secondary containment or outdoor weather-protected storage of hazardous chemicals and wastes. Ideally suited for complying with EPA's storm water regulations.

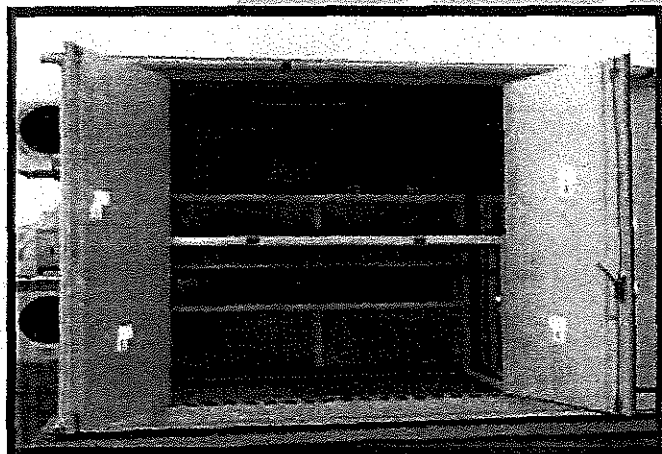
Standard Features

- Accommodates from two to sixteen palletized 55-gallon drums per storage level
- Built-in cross supports are designed to hold multiple four drum pallets per level
- Spill containment sump located in lower and upper levels
- Constructed of heavy gauge steel for high strength and stability
- Interior and exterior structure protected by durable, chemical-resistant coatings
- Static grounding connection and grounding/bonding lugs
- Floor loading: 300 PSF capacity
- Hold-down plates for permanent anchoring
- Easy relocation with forklift or crane



Optional Features

- Lighting
- Air vents/Ventilation
- Horizontal drum racks
- Explosion-relief panels
- Sump drain or overflow pipe
- Corrosion-resistant sump liners
- Doors - hinged, sliding or roll-up
- Upper tier secondary containment
- Liquid level detector with alarm (explosion proof)
- Fire suppression sprinklers (NFPA 231C) for each level
- Removable fiberglass or galvanized steel floor



P-Series Storage Specifications

Model No. *	Capacity		Nominal Outside Dimensions	Sump Capacity (gal.)		Tare Weight (lbs.)
	(55 gal. drums)	(# of pallets)		Level 1	Level 2	
2P	8	2	10'3" x 5'6" x 5'3"	150	N/A	2,100
4P	16	4	10'3" x 5'6" x 9'7"	150	150	3,700
8P	32	8	19'8" x 5'6" x 9'7"	300	300	7,000
16P	64	16	19'8" x 10'3" x 9'7"	600	600	12,400

* Please call for information on additional sizes.

NOTE: When adding sliding doors, the outside length for the 8 & 16 increases to 10'5" and the 32 & 64 increases to 20".

Represented by:

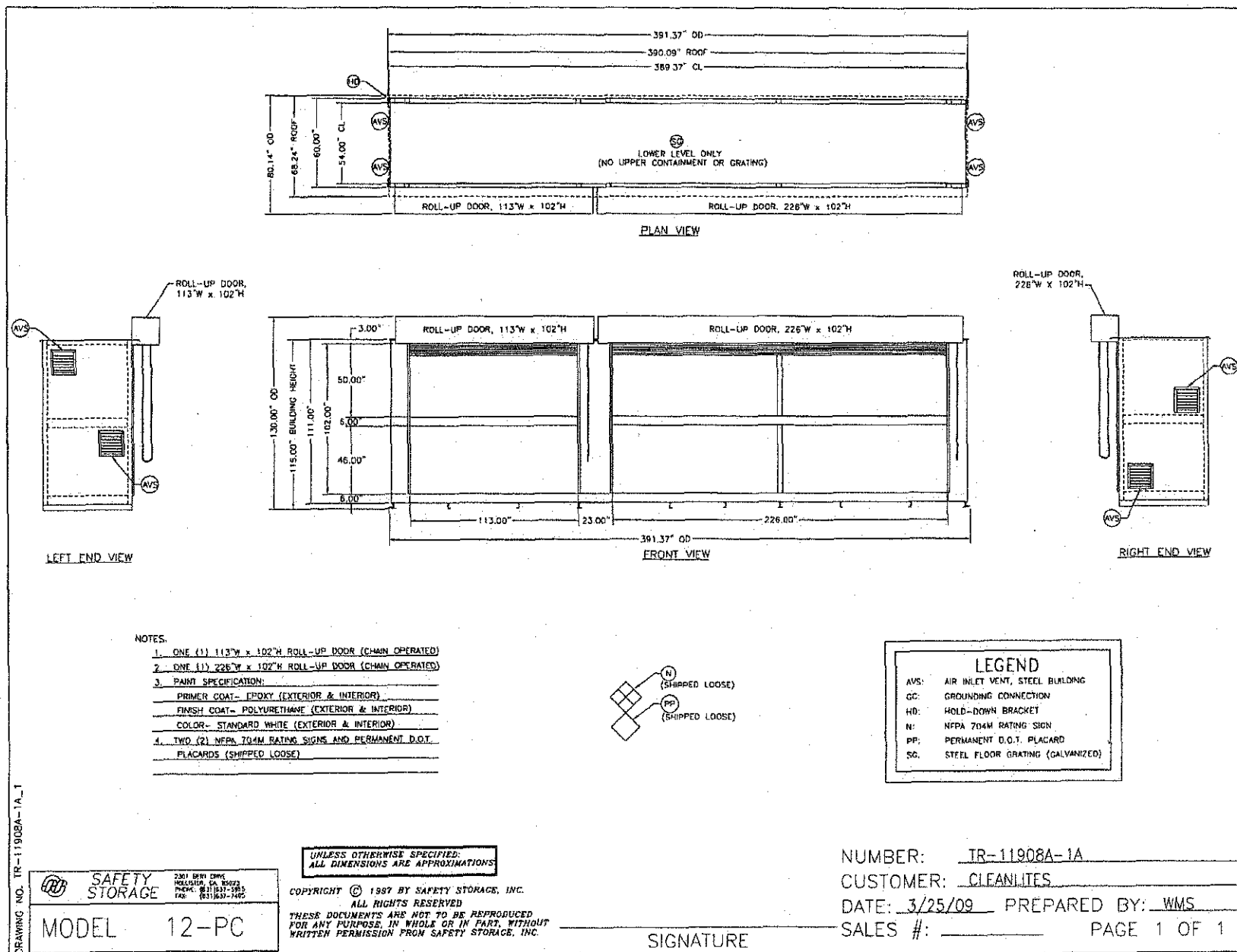
Safety Storage, Inc.
 Toll Free: (888) 345-4470
 Fax: (217) 345-4428
 E-mail: info@safetystorage.com
 Web: www.safetystorage.com



SAFETY STORAGE DRUM PALLET STORAGE UNIT – MODEL 12P

STANDARD FEATURES

- Pallet Storage Capacity: 12 Pallets
- 55-Gallon Drum Storage Capacity: 48 Drums
- Nominal Ext. Dim. (LxWxH): 29'3" x 5'6" x 9'7"
- Number of Storage Openings: 6 (3 Lower & 3 Upper)
- Int. Dim. (LxWxH): 9'3" x 4'6" x 3'10" (Each Lower Tier Opening)
- Int. Dim. (LxWxH): 9'3" x 4'6" x 3'10" (Each Upper Tier Opening)
- Int. Dim. (LxWxH): 27'9" x 4'6" X 3'10" (Lower Tier + Lower Tier + Lower Tier)
- Int. Dim. (LxWxH): 27'9" x 4'6" X 3'10" (Upper Tier + Upper Tier + Upper Tier)
- Exterior Wall Construction: Noncombustible galvanized steel sheets attached to corrosion-protected structural steel tubing for maximum durability and weather resistance
- Roof/Ceiling: Noncombustible continuously welded steel sheets attached to structural steel tubing. Corrosion-protected for maximum durability and weather resistance
- Sump Wall Construction: Noncombustible continuously welded sheet sheets for maximum spill containment protection
- Base of Unit: Open channel construction providing visual inspection. Coated with a protective undercoating for maximum corrosion resistance
- Safety Chains (when optional doors are not ordered)
- Thirty-six (36) steel pallet loading supports (3 per pallet), corrosion-protected for maximum durability and weather resistance
- One (1) exterior static grounding connection
- Built-in 6-inch deep secondary containment sump with chemical-resistant coating
- Internal Spill Containment Capacity: 450 gallons (Lower Tier)
- Interior & Exterior Primer Coat: high solids chemical-resistant epoxy (white semigloss)
- Interior & Exterior Finish: high solids gloss-white aliphatic polyurethane
- Four (4) Hold-down Brackets
- Uniformly Distributed Load (Upper & Lower Tiers): 250 psf
- Tare Weight: 9,600 lbs.



Appendix D Marking Signs

Appendix D Marking Signs

LARGE PCB ARTICLES AND CONTAINERS

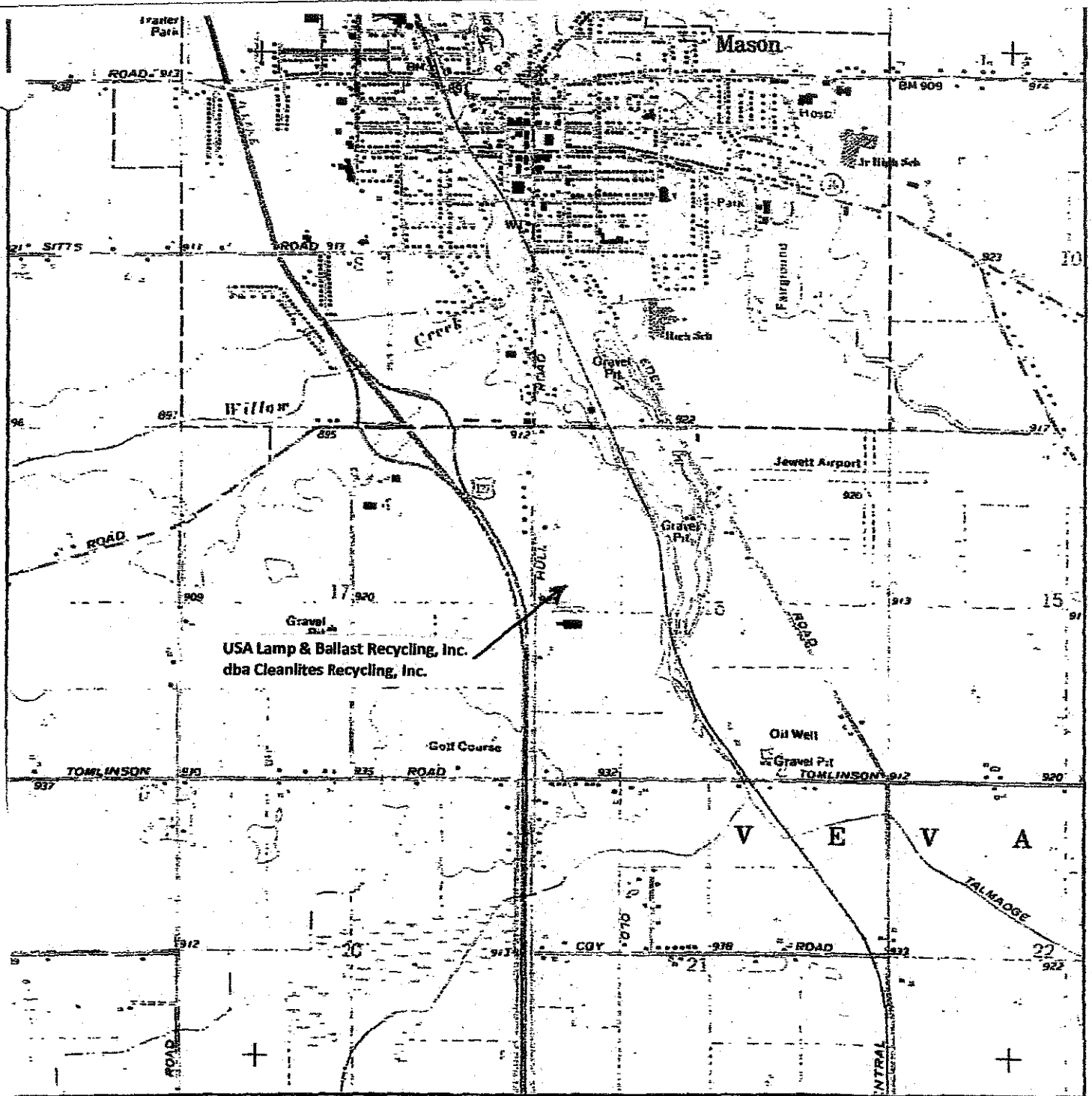



SMALL PCB ARTICLES



Appendix E Flood Plain Maps and Topographic Map

US EPA ARCHIVE DOCUMENT



	TARGET QUAD	SITE NAME: Cleanlites Recycling
	NAME: MASON	ADDRESS: 665 Hull Road
	MAP YEAR: 1970	Mason, MI 48854
	SERIES: 7.5	LAT/LONG: 42.5629 / 84.443
	SCALE: 1:24000	



Scale: 4



LOMC: 06-05-B033V-260092



Make a FIRMette

Map area showing a river and surrounding urban/developed areas. The river is highlighted in a light blue color.

Legend and metadata information on the right side of the map interface.



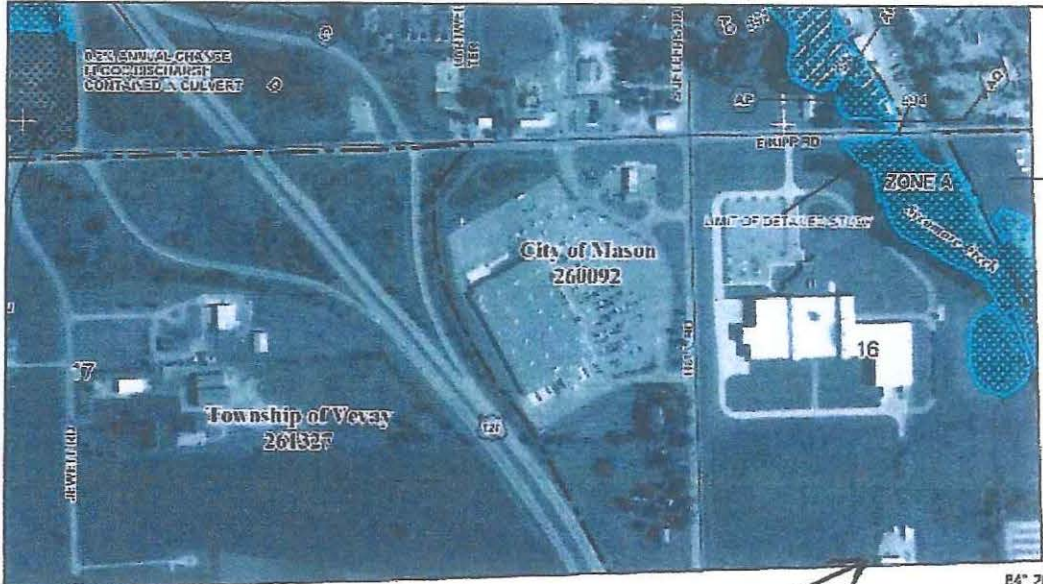
FEMA



Scale: 15 % LOMC: 06-05-B033V-260092



Zoom Win	Pan
Zoom In	Zoom Out
1:1 Zoom In	MAX Zoom Out
Make a FIRMette	



JOINS PANEL: 0255

84' 26'

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



US EPA ARCHIVE DOCUMENT

Appendix F List of Companies Owned or Operated By Harland J. Drumm

The following is a list of companies, owned or operated, currently or in the past, by Mr. Harland J. Drumm.

Cleanlites Recycling South, LLC
195 Ben Abi Road
Spartanburg, SC 29303

USA Lamp & Ballast Recycling, Inc
7650 215th St W
Lakeville, MN 55044

D&K Asset Management, LLC
195 Ben Abi Road
Spartanburg, SC 29307

USA Lamp & Ballast Recycling, Inc
2010 Route 9W, Suite 6
Milton, NY 12547 (This Facility is closed)

USA Lamp & Ballast Recycling, Inc
185 Ben Abi Road
Spartanburg, SC 29303

USA Lamp & Ballast Recycling, Inc
423 Lodge Road
Overbrook, OK 73453 (Property sold)
(This facility never opened or operated)

USA Lamp & Ballast Recycling, Inc
d.b.a. Cleanlites Recycling, Inc
100 Fine Road
Spartanburg, SC 29303

Harland Drumm Enterprises, Inc
5366 Este Avenue
Cincinnati, OH 45232

USA Lamp & Ballast Recycling, Inc
d.b.a. Cleanlites Recycling, Inc
665 Hull Road
Mason, MI 48854

D&H Transportation Services, Inc
1534 Jooten Road
Worthington, MN 56187

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

Full Circle Recyclers, Inc
No longer in operation

Appendix G Resume for Thomas M. Kimmel

4374 Brogan Road
Stockbridge, MI 49285

Phone 517.851.7534
E-mail tom@usalamp.com

Thomas M Kimmel

CAREER SKILLS / KNOWLEDGE

- Sales/marketing management
- Expert communicator
- Competitive maneuvering
- Problem resolution
- Decision-maker relations
- Major Client development
- Expert closer
- Start-up operations/organization
- Profit/revenue growth strategies
- Negotiating skills
- Skilled troubleshooter
- Staff supervision/development
- Operations/engineering
- Customer service
- Universal Waste compliance
- Environmental Industry

CAREER EXPERIENCE

- Involved with advising, compiling and determining universal waste rules and regulations on the local and state level.
- Provide environmental and compliance training and seminars for government, industry, business, the general public and company personnel.

USA LAMP & BALLAST RECYCLING, INC / CLEANLITES RECYCLING, INC
Mason, MI, Cincinnati, OH and Spartanburg, SC Nov 1997–Present

President, Sales & Operations

Started, built, negotiated and executed sale and growth of a universal waste recycling business from a single facility to an industry leader with multiple recycling facilities.

- Establish and implement policies, procedures and programs for multiple facilities including stringent compliance with local, state and federal environmental rules and regulations while emphasizing customer service and satisfaction.

- Develop new markets and services. Expanded services from lamp and ballast recycling to include recycling of batteries, computer / electronics, mercury devices and toner cartridges.
- Negotiate, secure and maintain contracts and relationships with major Fortune 100 and 500 customers such as General Motors, DaimlerChrysler, BMW, Hertz and Proctor & Gamble.
- Manage internal costs. Streamline operations and regularly renegotiate and monitor contracts to reduce costs and increase revenue.

FULL CIRCLE RECYCLERS, INC

Bronx, NY

June 2002–Dec 2004

Acting President

Successfully negotiated clean-up and closure of PCB / Universal Waste Recycler with the US EPA according to EPA, State and Local regulations while re-establishing customer base under the USA Lamp & Ballast Recycling, Inc corporation umbrella.

- Streamlined and restructured facility operations while strictly managing internal costs during closure process.

METRO RECYCLING SYSTEMS, INC / METRO SUPPLY EXPRESS, INC

(WBE)

ZEAL RECYCLING SYSTEMS, INC / ZEAL LASER TONER (WBE)

Mason, MI and Spartanburg, SC

April 2002–Present

Vice President / General Manager

Universal Waste Recycling Services and Turnkey Toner Services for a WBE

- Design and implement sales, marketing and operations procedures, strategies and systems highlighting the benefits of conducting business with a WBE
- Emphasize client relations, new account development, and sales force productivity.
- Create innovative and effective presentations; conceptualize productive selling programs.
- Manage internal costs. Streamline operations and regularly renegotiate and monitor contracts to reduce costs and increase revenue.

MERCURY WASTE SOLUTIONS

Roseville, MN

Nov 1996 to Nov 1998

General Manager

Reorganized and streamlined sales and operations of a lamp and ballast recycling company increasing sales by over 100% and leading to a public stock offering.

- Instituted sales and marketing program emphasizing customer service, sales force productivity and account development.
- Reorganized and set quality standards to significantly reduce costs and increase profits.
- Instrumental in successful issuance of IPO.

ABB SERVICE, INC

Edina, MN

Nov 1995 to Nov 1996

Client Manager

Sales and marketing of transformer turnkeys, switchgear sales, setup and service programs along with PCB spill response and audits for a multinational corporation.

- Increased profits at a facility that was scheduled for closure or annexation to one of the company's top performers.
- Developed, negotiated and secured major contracts with Fortune 100 and 500 companies. Generated new customers and increased sales levels of current customers.
- Marketed other ABB Divisions such as ABB Power Generation, ABB Power T&D, ABB Engineering Services and ABB Motor Shop to new and current customers.

DYNEX INDUSTRIES

St Paul, MN

Sep 1990 to Nov 1995

Transformer Switchgear Sales Representative

- Expanded accounts and territory for the Farmington Hills, MI facility. Developed relationships and secured major accounts with Fortune 100 and 500 companies such as Ford, General Motors and Martin Marietta.

Market Development Manager

- National Lamp and PCB Ballast Division. Developed division from \$0 to \$2 million in less than 2 years. Responsible for all hiring, budgeting, procurement and establishment of policies and procedures. Trained RCRA and HazMat personnel and designed and implemented a sales and marketing program.

Sales Training and Trade Show Production

- Hired, trained and motivated sales staff. Created marketing brochures and sales literature as well as producing a sales video.

Motor Shop Manager

- Increased sales to over 1.5 million.

Transform Switchgear Sales Representative

- Developed new accounts and marketing strategies.

Motor Sales Representative

- Improved product line and increased number of customers. Streamlined division and increased profit margin.

Highlights of Employment History from 1972 to 1988Sales Representative - Industrial Lighting – Minneapolis, MN

- Perfected strengths in prospecting, cold calling, procurement, expediting shipments, and customer service and territory development.

Sales Manager – Accellite Lighting Inc – Richfield, MN

- Generated more than \$400K annually through personal sales and supervision of sales staff. Designed sales catalogs, evaluated sales staff, administered commissions, promoted new products and conducted staff meetings.

District Sales Manager – Accella Engineering – Indianapolis, IN

- Responsible for marketing, sales formation, recruiting, training and evaluation of sales staff. Designed catalog of over 2000 warehoused items.

Sales And Inventory Manager of a new TV and video rental store.

- Increased sales from 0 - \$250K.

Owner – Booth Services – Lakeville, MN

- Telephone equipment maintenance company serving Centel Telephone, Farmington, MN

District Sales Manager – Maintenance Engineering – Fargo, ND

- Top producer among 500 sales representatives. Developed and established approximately 200 new accounts.

Assistant Plant Manager – Lee’s Manufacturing – Cannon Falls, MN

- Responsible for scheduling, training, directing, and evaluating employees.

MILITARY

UNITED STATES ARMY

1968 to 1971

Security Coordinator

Honorable discharge. National Defense Award. Good Conduct Medal. Safe Drivers Award.

TRAINING

<ul style="list-style-type: none">• Hazwoper 40-hour• Hazwoper 8-hour• Hazwoper Supervisory• Hazcom• Blood borne Pathogens• Lockout/Tagout• Confined Spaces• Forklift	<ul style="list-style-type: none">• DOT Hazmat• Controlled Substances• Controlled Substances Supervisory• PPE• Emergency Response• Spill Prevention & Response• Materials Handling and Storage• General Safety Guidelines
--	--

Appendix H List of Companies Owned or Operated By Thomas M. Kimmel

The following is a list of companies, owned or operated, currently or in the past, by Mr. Thomas M. Kimmel.

Cleanlites Recycling South, LLC
195 Ben Abi Road
Spartanburg, SC 29303

D&K Asset Management, LLC
195 Ben Abi Road
Spartanburg, SC 29307

USA Lamp & Ballast Recycling, Inc
185 Ben Abi Road
Spartanburg, SC 29303

USA Lamp & Ballast Recycling, Inc
d.b.a. Cleanlites Recycling, Inc
100 Fine Road
Spartanburg, SC 29303

USA Lamp & Ballast Recycling, Inc
d.b.a. Cleanlites Recycling, Inc
665 Hull Road
Mason, MI 48854

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

USA Lamp & Ballast Recycling, Inc
7650 215th St W
Lakeville, MN 55044

USA Lamp & Ballast Recycling, Inc
2010 Route 9W, Suite 6
Milton, NY 12547 (Facility Closed)

USA Lamp & Ballast Recycling, Inc
423 Lodge Road
Overbrook, OK 73453 (Property sold)
(Facility never opened or operated)

Metro Recycling Systems, Inc
Metro Supply Express, Inc
100 Fine Road
Spartanburg, SC 29303
(No longer affiliated with either Metro
company)

Full Circle Recyclers, Inc
No longer operating

Southern Recycling, Inc
No longer operating

Mercury Waste Solutions, Inc
No longer operating

ABB Service, Inc
No longer operating

Dynex Industries, Inc
No longer operating

Appendix I Closure Schedule

Upon making the decision to close the facility, Cleanlites will comply with the following Closure Schedule.

1. Notify the Approving Authority in writing at least 60 days prior to the date on which final closure is expected to begin.
2. The date that closure is expected to begin must begin within 30 days of the receipt of the last shipment of PCB containing waste.*
3. All PCB waste must be removed from the site within 60 days of receipt of the last shipment of PCB waste.*
4. All closure activities specified by the approved Closure Plan must be complete within 120 days of receipt of the last shipment of PCB waste.*
5. Within 30 days of completion of closure Cleanlites will submit to the Approving Authority in writing, by registered mail, a certification that the PCB Storage Unit has been closed in accordance with the approved Closure Plan. This certification will be signed by the owner or operator and by an independent Registered Professional Engineer.

* For good cause the Approving Authority may extend these deadlines for up to 30 days.

Appendix J Closure Plan

US EPA ARCHIVE DOCUMENT

Closure Plan
for
PCB Storage Facility

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

665 Hull Road
Mason, MI 48854

March 2016

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3.00 CLOSURE SCHEDULE	3
4.00 NOTIFICATION OF INTENT TO CLOSE	4
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1.00 GENERAL OBJECTIVES AND SCOPE

The purpose of this plan is to describe the procedures that USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc. (Cleanlites) will follow when it closes its PCB Storage Facility at 665 Hull Road, Mason, MI 48854. The facility recycles lighting ballasts, which contain small capacitors that contain polychlorinated biphenyl (PCB). The operation includes stripping of all external attachments such as wires, mounting brackets, etc. Placing the ballasts in 55 gallon drums and shipping to a TSCA approved PCB disposal facility. Ballasts themselves are not disassembled by Cleanlites. The maximum capacity of the PCB storage building is 48 drums at about 600 lb/drum or 28,800 lbs of ballasts.

The following regulations have been followed for the development of this closure plan:

- U.S. Environmental Protection Agency (EPA) Toxic Substances Control Act (TSCA) regulations (40 CFR 761.65(e)) for storage of PCBs for disposal.
- U.S. EPA Resource Conservation and Recovery Act (RCRA) regulations (40 CFR 264 Subpart G) for Hazardous Waste Treatment Storage and Disposal Facilities (TSDFs)
- Applicable State and Local Rules and Regulations.

This plan has been developed to eliminate the potential for post-closure releases of PCBs that could present an unreasonable risk to human health or the environment.

The following closure plan is based on an understanding of current conditions at the site. It sets forth the steps that will be taken by Cleanlites to properly and completely close its PCB ballast recycling facility. These steps include:

- A description of how and when the facility will be closed;
- A conservative estimate of the maximum extent of storage operations during the facility's active life;
- A description of the steps needed to decontaminate PCB waste equipment during closure;
- A schedule for final closure;
- Certification requirements by an environmental company utilizing their own environmental staff;
- Notification requirements to the US EPA Regional Administrator.

2.00 PCB WASTES STORED AT CLEANLITES

2.10 DESCRIPTION AND LIST OF SERVICES

Cleanlites recycles PCB ballasts from lighting fixtures. The following is a description of Cleanlites's services offered to a typical customer. The ballasts, most of which contain PCB capacitors, are stripped of all external attachments such as wires, mounting brackets, etc. Ballasts themselves are not disassembled. Processed ballasts are placed in 55 gallon drums for shipment to a TSCA approved PCB disposal site. If a leaking ballast is discovered during the processing, the remaining contents of the container will be considered to be contaminated. The container will be resealed and shipped to a TSCA approved PCB disposal site. Non-contaminated components are shipped off-site to be recycled.

1. Pickup and transport of the ballasts in the loaded drums (17C or 17H) from loading dock of a customer's building(s) to Cleanlites's facility. The drums are weighed at Cleanlites's facility.
2. At Cleanlites's facility, the PCB ballasts are removed, separated, repackaged, and sent to a TSCA approved facility for destruction or disposal.
3. The disposition of materials is as follows:
 - a. All PCB materials contained in the ballasts are either destroyed at a TSCA approved PCB incinerator or disposed of in a TSCA approved, secure, chemical waste landfill, depending on the option selected by the customer.
 - b. All materials not containing or contaminated with PCBs, such as wires, brackets, steel, etc. that are attached to the outside of the ballast, are removed from the ballasts and are separated by type and sent to the appropriate recycling process. The ballasts themselves are not dismantled by Cleanlite.
4. All documentation is included:
 - a) Cleanlites provides drum labels to customer.
 - b) A hazardous waste manifest is issued to customer prior to pick-up.
 - c) Upon receipt of shipment at Cleanlites's facility, a hazardous waste manifest is mailed to customer as soon as possible.
 - d) A certificate of disposal/destruction is issued to customer after PCB capacitor is landfilled/incinerated.

2.20 ON-SITE PCB WASTE INVENTORY

There are two PCB accumulation areas at Cleanlites. One is the primary storage unit and the other is a temporary storage area. The exact quantities of PCB waste (e.g. ballasts, PCB capacitors, PCB debris) on-site are expected to vary. However, the total volume of all PCB

waste (ballasts, capacitors) stored in containers will never exceed the maximum allowed volume onsite at any one time.

3.00 CLOSURE SCHEDULE

The following schedule includes anticipated dates when PCB wastes will no longer be accepted, stored, or dismantled at Cleanlites and interim milestone dates which will allow tracking of the progress of closure.

<u>Closure Event</u>	<u>Anticipated Completion Date</u>
1. PCB Wastes no longer accepted, stored or dismantled	2026 year A.D.
2. Notify US EPA Regional Administrator	180 days prior to date of initiation of closure
3. Final shipment of waste accepted	30 days prior to date of initiation of closure
4. * Remove all existing non-recyclable inventories (including leaking ballasts and capacitors) from site	Within 90 days after date PCB of initiation of closure
5. * Remove all remaining inventories of waste (i.e. non-PCB waste) on site,	Within 120 days after closure initiation date
6. * Decontaminate drum storage containment areas	Within 130 days after closure initiation date
7. * Decontaminate loading/unloading areas and all floors and operations areas subject to spills	Within 140 days after closure initiation date
8. * Ship all drums of remaining PCB waste (including wash and rinse water generated in Steps 6 and 7) for final treatment and drums of contaminated, absorbent and personal protective equipment to permitted off-site facilities	Within 160 days after closure initiation date

- | | |
|---|---|
| 9. Submit closure certifications to US EPA Regional Administrator by owner/operator and an environmental company utilizing their own environmental staff. | With 175 days after closure initiation date |
| 10. Invite US EPA to review closure | Within 60 days receipt of closure certification |
| 11. Closure completed | Within 185 days after closure initiation date |

* All items above marked with an asterisk are closure steps warranting inspection and/or supervision by an independent registered professional engineer.

4.00 NOTIFICATION OF INTENT TO CLOSE

At least 180 days before the date closure is to begin, Cleanlites will notify the US EPA Regional Administrator of the exact date it intends to initiate closure. In the event that amendments to the closure plan are warranted, said amendments will be submitted to the US EPA Regional Administrator along with the aforementioned notification of closure initiation date. If the US EPA Regional Administrator does not approve the plan or requests it to be modified, Cleanlites will submit a new or modified plan to US Regional Administrator.

5.00 REMOVAL AND/OR TREATMENT OF PCB WASTE INVENTORIES

This section of the closure plan describes how all PCB waste inventories, including ballasts and any other contaminated materials, will be shipped from the Cleanlites facility to permitted facilities. All of the actions indicated in this section will be completed within 120 days after the closure initiation date.

5.10 SHIPMENT OFF-SITE

Upon closing its PCB ballast-recycling facility, Cleanlites will ship all existing inventories of PCB wastes to TSCA approved off-site facilities. The types of off-site hazardous waste management units to be used for disposal and/or treatment of PCB wastes include licensed TSCA facilities utilizing high temperature incineration for PCB destruction or TSCA facilities with secure chemical waste landfills.

These shipments will be accompanied by a properly completed hazardous waste manifest and appropriate land disposal restriction notification forms. All containers shipped off site

will be in accordance with U.S. EPA (40 CFR 262.32) specifications. All transporting equipment used to ship these materials off site will be placarded in accordance with U.S. DOT requirements (49 CFR 172, Subpart F).

All transporters used will have PCB Notifications on file in all appropriate states as required, and will have obtained an EPA identification number. All off-site facilities utilized will be fully permitted to accept the PCB wastes shipped, to complete hazardous waste manifest, to render the appropriate disposition and to provide certificates of such disposition.

5.20 TREATMENT OF REMAINING INVENTORIES

Following the shipment off site of all existing PCB-bearing wastes as described in Section 5.10, all remaining inventories (including the decontamination washes and rinses from the container storage area and operations area) will be shipped off site following the shipping specifications described in Section 5.10.

6.00 DECONTAMINATION OF PCB WASTES STORAGE AREAS AND DOCKS

This section of the closure plan describes how facility equipment and structures used to manage PCB wastes will be decontaminated.

6.10 REMEDIATION GOALS

The underlying remediation goal for all PCB-contaminated media is to reduce the level of exposure to PCBs to an acceptable level of risk. The acceptable level of risk is typically manifested in the regulatory realm through predetermined action levels for PCB concentrations. The exposure risk is determined through an evaluation of likely pathways of exposure. Reducing the level of PCB exposure can be accomplished by active removal or treatment of PCB-contaminated materials.

Hypothetically, there are two potential sources of exposure at the Cleanlites facility. The primary source of exposure is from the reuse of former indoor, high contact, nonporous and pervious solid surfaces (floors, work benches, etc.) and outdoor nonporous and pervious low contact solid surfaces (loading docks, pavement, etc.). There could also be a potential for a low level of exposure from volatilization of PCBs while they are present on-site.

A potential secondary source of PCB exposure is through surface water contamination. In general, PCBs are considered to be very immobile unless other, more soluble oily compounds are present to act as carriers. An uncontrolled emission of PCB-contaminated material or precipitation in contact with PCB-contaminated outdoor surfaces could result in the release of unacceptable levels of PCBs to surface water bodies identified in the facility's SPCC Plan.

6.11 PROPOSED MANAGEMENT CONTROLS

Potential exposure to PCBs can be reduced to an acceptable level of risk through management, engineering and institutional controls.

Removal or treatment of PCB-contaminated nonporous surfaces will be conducted on an as needed, conservative basis in accordance with clean-up standards. Management controls included the training of all employees in proper PCB handling techniques and semiannual monitoring of PCB levels. Engineering controls included the cleaning and/or removal for off-site disposal of contaminated nonporous surfaces. This will prevent direct contact with PCBs, reduce volatilization and diminish the potential for leaching of PCBs by minimizing surface water infiltrations. Institutional controls include limited access to the building.

6.20 CONTAINER STORAGE AND LOADING/UNLOADING AREAS AND SHIPPING DOCKS

Following removal of all containers of PCB waste, per Section 5.10, container storage areas, plus all loading/unloading areas and docks, will be subject to a pre-clean-up inspection and pre-cleanup survey and screening. Any PCB residues will be cleaned up using the appropriate method as prescribed in Attachment 1 of this plan

6.20a PRE-CLEANUP INSPECTION

All areas of the facility that may be subject to PCB spills, to include the loading dock, the paved area between the loading dock and the repackaging area, the paved area between the repackaging area to the storage facility, and the paved area between the storage facility and the loading dock, and the containment pallets will be visually inspected for any signs of oily contamination or other signs of PCB contamination. Any such areas will be documented.

6.20b PRE-CLEANUP SURVEY AND SCREENING

A minimum of 32 wipe samples for PCB analysis will be taken as follows, to determine what areas may require decontamination.

<u>AREA</u>	<u>MIN. # OF SAMPLES</u>
Pallets (1 each)	12
Loading dock	4
Repackaging Area	4
Storage Facility	3
Travel ways	9

Sampling priority should be given to those areas that were documented during the pre-cleanup visual inspection. Additional samples may be taken in any area if required. The balance of the samples will be taken on a random basis as prescribed by 40 CFR 761.267 and 761.302a. Once the grid is established, 10% of the grid squares should be wipe sampled. If

suspected contamination has stained concrete, a scrape sample should be taken at that point, otherwise wipe sampling should be done as prescribed in Attachment 3. Figure 1 shows the path followed by potentially PCB containing ballasts and PCB containing ballasts through the facility. All areas covered are paved surfaces. In addition, two wipe samples should be taken on the fork lift used to remove PCB containing materials.

6.20c RESULTS

If all samples are negative (less than $10 \mu\text{g}/100 \text{ cm}^2$) for PCB contamination, no decontamination activities are required. If any samples indicate levels of PCB in excess of the $10 \mu\text{g}/\text{cm}^2$, statistical sampling grids based on the sampling scheme adapted from the Midwest Research Institute's "Verification of PCB Spill Cleanup by Sampling and Analysis" and "Field Manual for Grid Sampling of PCB Spill Sites to Verify Cleanup."

Any areas with PCB concentrations in excess of $10 \mu\text{g}/100 \text{ cm}^2$ will be decontaminated by cleaning the surfaces with materials(s) compatible with the waste residue to be removed. Equipment and materials used may be a floor-cleaning unit containing a cleaning solution designed for removing PCB residues. Wash water and rinse waters will be squeegeed to a low point, and then transferred to containers or appropriate tanks.

Following cleaning operations, where necessary the areas will be rinsed with high-pressure steam, without detergent. This first rinse water will be transferred to containers or tanks for analysis and shipment to a permitted off-site facility. A second rinse will then be performed if indicated and warranted by analytical results of the first rinse water and the water collected. Water from the second rinse will be transferred to a clean holding tank or to clean containers. A sample of this second rinse will be collected and analyzed to determine whether or not decontamination is adequate. This procedure will be repeated until decontamination to acceptable action levels is achieved. If residues are present, each area will be sampled and tested for PCB contamination.

Following the completion of analytical testing of the rinse water, the data will be reviewed with the environmental company supervising the closure and Cleanlites personnel. If decontamination is not complete, the wash and/or rinse cycles will be repeated until decontamination is complete.

It has been estimated that approximately 500 gallons of wash and rinse water will be generated from the container storage areas and loading/unloading areas of decontamination operations. All rinse waters will be placed into containers or tanks for shipment off site to a designated, TSCA approved TSDF. Decontamination will be in accordance with 40 CFR 761.79 found in Attachment 2.

6.21 WIPE SAMPLING OF INTERIOR NON-POROUS SURFACES

Following the completion of cleaning and rinsing operations, wipe sampling will be conducted on the floor areas and other non-porous surfaces in accordance with the U.S. EPA's "Field Manual for Grid Sampling of PCB Spill Sites to Verify Cleanup." Wipe sampling will be conducted to comply with the definition of a "standard wipe test" in 40 CFR 761.123 found in Attachment 3.

The results of all analyses will be attached to the final closure certification when completed. Acceptable action levels for cleanup standards will be conservatively based upon the U.S. EPA's Guidance on Remedial Actions for CERCLA Superfund Sites with PCB contamination.

The guideline concentrations provided by the EPA do not imply that actions must be taken at a Superfund site, rather they indicate the area over which some action should be considered once it has been determined that action is necessary to provide protection of human health and the environment. The action levels of clean-up of indoor, commercial, and solid surfaces dictate that these surfaces will be cleaned up to a level of 10 micrograms/100 cm²

6.30 PROTECTIVE AND SPILL CLEAN-UP EQUIPMENT

Following the container storage area decontamination, all non-recoverable personal protective equipment, and spill clean-up equipment which have become contaminated during the operations specified in Sections 5.00 and 6.00 of this plan, will be containerized and shipped to a TSCA approved, permitted off-site facility. Movable equipment, such as shovels, pallets, etc., must remain in the storage unit until properly decontaminated in accordance with 40 CFR 761.79(c) found in Attachment 2.

6.40 EMPTY CONTAINERS

The number of empty containers previously holding PCB wastes at the facility will be maintained at a minimum. PCB wastes generated will be processed according to acceptable, previously described operational procedures, and in full compliance with DOT and EPA regulations. Empty containers will be decontaminated in accordance with 40 CFR 761.79(c) found in Attachment 2. Empty containers that held wastes which cannot be cleaned using on-site cleaning systems will be left intact and shipped to appropriate, TSCA approved, off-site facilities for reclamation and/or disposal.

7.00 FACILITY STATUS DURING CLOSURE

During the entire closure process, the facility will maintain compliance with The State of Michigan's solid and hazardous waste regulatory status requirements as well as U.S. EPA and OSHA requirements.

8.00 CERTIFICATION OF CLOSURE

This section of the plan describes the protocol, which will be followed to certify that closure is complete.

8.10 CERTIFICATION BY OWNER/OPERATOR

When closure is complete, the owner/operator will submit a signed certification to the EPA Regional Administrator that the facility has been closed in full accordance with the specifications in the aforementioned closure plan.

8.20 CERTIFICATION BY AN ENVIRONMENTAL COMPANY

8.21 INSPECTIONS DURING CLOSURE

During the facility closure operations specified in Sections 5.00 through 6.40 of this plan, Cleanlites will obtain the services of an environmental company to monitor the operations, so as to ensure that the PCB waste inventory removal procedures, and the facility decontamination operations are carried out in accordance with this closure plan.

8.22 CERTIFICATION BY THE ENGINEER

When closure has been completed, the environmental company indicated in Section 8.21 of this plan will submit a written certification, signed by a registered Professional Engineer, that the facility has been closed in accordance with the specifications in the approved closure plan.

9.00 AMENDMENT OF PLAN

This closure plan will be amended from time to time during the active life of the facility whenever changes in operating conditions, facility modifications, anticipated year of closure, or any of the information in this plan substantially changes. Closure cost estimates will be adjusted for the same reasons in addition to the requirement in Section 9.40 above.

Any proposed amendment to this closure plan will be submitted for approval prior to incorporating any amendments to this closure plan.

ATTACHMENT 1: Health and Safety Plan

HEALTH AND SAFETY PLAN

Introduction

Though it is very unlikely that employees will come into contact with liquid PCBs at this facility, this Health and Safety Plan has been developed to address that remote possibility. The plan will address emergency information, hazards associated with PCBs, Emergency first aid procedures, proper PPE, personnel decontamination, training, and other issues associated with PCB cleanup. The contractor performing the cleanup will provide and identify an individual as "Safety Officer" for the cleanup. That person's name and contact information will be distributed to all personnel involved in the project and will be posted at the site.

Emergency Information

In the event of an emergency situation that occurs during pre-cleanup, cleanup, or post cleanup operations, the following actions should be taken.

1. Remove injured or contaminated persons from the danger area if this can be done safely.
2. Evacuate the area if necessary.
3. Call 911 for emergency assistance
4. Notify supervisor
5. Notify Project Safety Officer

The nearest medical facility is the Mason Urgent Care Clinic located at:

**800 East Columbia St.
Mason, MI 48854**

Phone: 517-244-8900

Driving directions follow.

Depart Plant parking lot and turn RIGHT on Trillium Dr.

At STOP sign and turn RIGHT onto Hull Road.

Travel about 0.3 miles where road name changes to South Jefferson.

Travel about one 1.0 miles and turn RIGHT onto East Columbia Street.

Travel about 0.7 miles to Mason Urgent Care Clinic.

All emergency services can be accessed by calling 911.

Component and Health Hazard Data

Most PCBs stores at this site are Aroclors. The primary routes of exposure to PCBs are inhalation, ingestion, and skin/eye contact. The potential for exposure to PCBs is minimal since the PCB wastes are contained within lamp ballasts stored inside of U.S. Department of Transportation (DOT) approved containers. This does not preclude the use of external body protection during the site investigation, sampling, and decontamination. PCBs are considered moderately toxic by ingestion. They are also suspected human carcinogens. PCBs have been shown to be carcinogens and tumorigens and to have adverse effects on reproduction in laboratory animals. There are two known effects on the human body. They are a skin effect and a toxic effect on the liver. Symptoms of skin exposure include acne-like lesions and rashes while systemic intoxication symptoms include nausea, vomiting, weight loss, jaundice, edema, and abdominal pain. The following exposure levels are provided as a reference guide to assist in the selection of personal protective equipment (PPE) to be used during site inspection, sampling, and decontamination procedures.

NIOSH:	
TWA (Polychlorinated Biphenyls)	0.001 mg/m ³ (1977)
National Academy of Science	
Suggested no adverse response level	350 mg/L (1977)
OSHA PEL	
TWA (Aroclor 1254)	0.05 mg/m ³ (skin)
ACGIH	
TLV-TWA (Arclor 1254)	0.5 mg/m ³ (skin)
OSHA PEL	
TWA (Arclor 1242)	1 mg/m ³ (skin)
ACGIH	
TLV-TWA (Arclor 1242)	1 mg/m ³ (skin)

PCBs are combustible and when exposed to heat or flame. When heated to decomposition temperature, they emit highly toxic chlorine gas.

Emergency and First Aid Procedures

The following first aid procedures should be performed if an individual is directly exposed to PCBs.

Inhalation – Remove individual to fresh air. If breathing is difficult, give oxygen. Perform CPR if breathing has stopped. Seek medical aid.

Skin Contact – Wash thoroughly with soap and water. If skin irritation appears, seek medical aid.

Eye Contact – Immediately flush with large quantities of water for at least 15 minutes. Seek medical attention.

Ingestion – Do NOT induce vomiting. Seek medical attention immediately.

Employee PPE

The following is the recommended PPE for personnel working in a potential PCB contaminated environment.

Eye Protection – Industrial safety glasses minimum. As necessary to comply with 29 CFR 1910.33 and work area conditions. Use side shields, goggles, or face shields.

Skin Protection – As required. Industrial resistant, flexible-type gloves should be worn when handling PCB containing materials. In addition, industrial-type clothing and safety footwear should be worn. Depending on the working conditions, impervious, protective garments such as head/neck covers, aprons, jackets, pants, coveralls, boots, etc. may be required.

Respiratory Protection – If adequate ventilation to ensure inhalation exposure below the TLV (PEL) is not available, use a NIOSH/MSHA approved, full face-piece, air purifying respirator with a combination high-efficiency particulate filter / organic vapor cartridge per 29 CFR 1910.134 and follow all manufacturer's Instructions and Warnings.

Ventilation – Provide, if possible, sufficient local and general ventilation to maintain exposure levels below the PEL's or TLVs.

Work / Hygienic Practices – Handle all materials with good industrial hygiene and safety practices. These practices include avoiding any unnecessary exposure to contaminated materials and timely removal of such material from skin, eyes, and clothing. Safety showers and eyewash stations should be available. If exterior, protective clothing is not used, work cloths should be changed before leaving the closure site. Wash hands and face before eating, drinking, or smoking. Wash thoroughly before leaving the site. Do not eat, drink, or smoke in the decontamination area.

Access Control

All areas requiring decontamination will be considered "Off Limits" to all personnel not involved in the cleanup operation. Physical barriers should be emplaced to prevent unauthorized personnel from entering the cleanup site. Site access should be monitored by the site cleanup manager and the site safety officer.

Training

All personnel engaged in cleanup operations will be required to have completed the following training.

1. Occupational Safety and Health Administration (OSHA) 40-hour Hazardous Waste Operations and Emergency Response Training (29 CFR 1910.120) with an annual 8-hour update.
2. OSHA Hazard Communication Program
3. Standard First Aid course including cardiopulmonary resuscitation (CPR)
4. Evacuation Procedures
5. Chemical Spill Control procedures per the facility's SPCC Plan
6. Use of PPE (29 CFR 1910 Subpart I)
7. Respiratory training and fit test (29 CFR 1910.134)

In addition, sampling technicians should have a minimum of three months of on-the-job training with seasoned sampling technicians.

Other Issues

Personnel involved in cleanup operations should also be aware of other issues, such as weather, environmental conditions, and how they may impact the cleanup project.

Attachment 2: Spill Cleanup Procedure

SPILL CLEANUP PROCEDURE

Due to the nature of the PCB containing items to be stored at this facility, the likelihood of a spill is remote. In the event that a spill of PCB containing materials is suspected, they will be cleaned in accordance with the requirements outlined in 40 CFR 761.125 and using the double wash/rinse procedure outlined below.

Introduction

The PCB Spill Cleanup Policy requires that low concentration spills of small amounts of PCBs on surfaces are to be removed by a double wash/rinse procedure. The objectives of the double wash/rinse are:

1. To recognize the lesser hazard resulting from these small quantity spills and from the cleanup of such spills.
2. To remove the easily removable PCB material thoroughly and quickly. It is also important not to redistribute PCBs or leave pieces of cleanup materials as a result of the cleanup procedure.

General Requirements for All Double Wash/Rinse Surfaces

For spill where there is still visible PCB-containing liquid present on the surface to be cleaned up, the double wash/rinse procedure first requires a pre-cleaning step. This step includes thoroughly wiping/mopping up the entire surface with absorbent paper or cloth material, such that there are no longer visible signs of the liquid present on the surface.

The double wash/rinse procedure called for in the cleanup of surfaces contaminated by small spills includes the two washing steps and two rinsing steps. The two washing and rinsing steps are slightly different depending on: (a) whether a contaminated surface was relatively clean before the spill, or (b) whether a surface was coated/covered with some sort of absorbent material, such as paint, dust, dirt, grime or grease.

Minimization of residual PCBs following the double wash/rinse procedure is facilitated by the proper selection and use of cleanup equipment. Scrubbers and the absorbent pads used in the double wash/rinse procedure shall not be dissolved by the solvents or cleaners used. Scrubbers and absorbent pads used in the double wash/rinse procedure shall not be dissolved by the solvents or cleaners used. Scrubbers and absorbent pads shall not contain greater than 2 parts per million (weight per weight) PCBs. Washing scrubbers and absorbent pads shall not be reused. Rinsing scrubbers and absorbent pads may be reused as washing scrubbers or absorbent pads if necessary, but this is not recommended. All double wash/rinse cleaning/absorbent materials must remain intact (i.e. do not shred, crumble, or leave visible fragments on the surface) after the double wash/rinse operation.

During the double wash/rinse process, all washing and rinsing liquids/solvents must be contained, captured, and properly disposed of in accordance with local, state and Federal regulations. Following use in the double wash/rinse process, all double wash/rinse equipment and absorbent materials must also be disposed of in accordance with local, state and Federal regulations.

Summary
Double Wash/Rinse Procedure

General

1. Use disposable cleaning materials which do not dissolve or break apart and contain traces of PCBs.
2. Remove any visible PCB liquid before washing/rinsing.
3. Capture and contain washing/rinsing solutions.
4. Properly dispose of cleaning materials and solutions/liquids.

Specific

1. For impervious surfaces not covered with paint, dirt, dust, grime, grease or other potential absorbent of PCBs:
 - WASH 1: Scrub with organic solvent (Hexane) and wipe up the solvent.
 - RINSE 1: Wipe surface with moistened pad, wipe up with dry pad.
 - WASH 2: Repeat WASH 1.
 - RINSE 2: Repeat RINSE 1.
2. For surfaces covered with paint, dirt, dust, grime, grease or other potential absorbent of PCBs:
 - WASH 1: Scrub with detergent and water, wipe up with dry pad.
 - RINSE 1: Rinse with water, wipe with wet absorbent pad, wipe up with dry pad.
 - WASH 2: Scrub with organic solvent (Hexane) and wipe up the solvent.
 - RINSE 2: Wipe surface with moistened pad, wipe up with dry pad.

Detailed Requirements for the Double Wash/Rinse

1. **Specific Requirements for impervious surfaces that do not appear dust or grimy before a spill, such as glass, automobile surfaces, newly poured concrete, and desk tops:**

WASH 1:

If there is no visible liquid or after having removed the visible liquid, cover the entire surface with organic solvent in which PCBs are soluble to at least 5% by weight (Hexane). Contain and collect any runoff solvent for disposal. Scrub rough surfaces with a scrub brush or disposable scrubbing pad. Add solvent such that the surface is always very wet for one minute per square foot. Wipe smooth surfaces with a solvent-soaked disposable absorbent pad for one minute per square foot. Any surface less than one square foot shall all be washed for one minute. Wipe, mop, and/or sop the solvent onto absorbent material until no visible traces of solvent remain.

RINSE 1:

Wipe the surface with an absorbent pad soaked with the same organic solvent-soaked disposable absorbent pad for one minute per square foot. Any surface less than one square foot shall also be washed for one minute. Immediately wipe/sop up the solvent on the surface with dry absorbent.

WASH 2:

Repeat WASH 1.

RINSE 2:

Repeat RINSE 1.

Detailed Requirements for the Double Wash/Rinse (continued)

2. **Specific Requirements for dirty, dusty, grimy or greasy surfaces or surfaces having surface coverings of some other kind of absorbent materials (where the spill probably largely absorbed on the materials on the surface):**

WASH 1:

If there is no visible liquid or after having removed the visible liquid, cover the entire surface with concentrated or industrial strength detergent or non-ionic surfactant solution. Contain and collect all cleaning solutions for proper disposal. Scrub rough surfaces with a scrub brush or scrubbing pad, adding cleaning solution such that the surface is always very wet, for one minute per square foot. Wipe smooth surfaces with a cleaning solution-soaked disposable absorbent pad for one minute per square foot. Any surface less than one square foot shall all be washed for one minute. Mop up or absorb the residual cleaner solution and suds with an absorbent pad until the surface appears dry. This cleaning should remove any residual dirt, dust, grime, or other absorbent materials following step one (above).

RINSE 1:

Rinse off the wash solution with one gallon of water per square foot and capture the rinse water. Mop up the wet surface until the surface appears dry.

WASH 2:

Next, cover the entire dry surface with organic solvent in which PCBs are soluble to a least 5% by weight. Scrub rough surfaces with a scrub brush or scrubbing pad adding solvent such that the surface is always very wet for one minute per square foot. Wipe smooth surfaces with a solvent-soaked, disposable absorbent pad for one minute per square foot. Any surface less than one square foot shall also be washed for one

minute. Wipe, mop, and/or sop the solvent onto absorbent material until no visible traces of the solvent remain.

RINSE 2:

Wipe the surface with an absorbent pad soaked with the same organic solvent as RINSE 1 (above) and immediately wipe up the solvent on the surface with a dry absorbent.

Attachment 3: Sampling Procedures

SAMPLING PROCEDURES

There are two sampling methods that may be used during the sampling phase of the cleanup. They are the "Wipe Sample" method and the "Scrape/Destructive Sample" method. Since there are no soil areas in the PCB Storage area, no other methods will be used.

Wipe Sampling – Wipe sampling is generally employed on areas where the surface is considered nonporous such as metal walls or concrete sealed with anon-porous, epoxy polyurethane. The sampling technician will be dressed in the appropriate PPE and will ensure that there are sufficient supplies and equipment available to properly sample all locations required.

At each wipe sample site, the technician will hold or place a 10 cm X 10 cm template over the point chosen for sampling. The template can either be held by an assistant or taped into place. The technician will log the exact location of the sample site. A photograph of the site should also be taken. When ready to sample, the technician will carefully remove the 2-inch X 2-inch gauze square, saturated with hexane, from the sample bottle, being careful not to contaminate the lid or the bottle's integrity. Using the gauze, wipe across the entire surface outline of the template in straight lines parallel to one side of the template. Then wipe the entire surface in straight lines perpendicular to the first set of wipes. The gauze should be returned immediately to the bottle, the bottle sealed and appropriately labeled, and placed in an ice chest to keep the sample at 4° C. Once the bottle is in the ice chest, the technician should complete the chain-of-custody form and any additional notes in the field log book. Gloves and templates are discarded into a plastic bag. New gloves and templates are used for each site to avoid cross-contamination. All disposable waste materials, such as gloves, and templates used in the sampling process, will be handled as PCB-contaminated items and disposed of properly.

Scrape/Destructive Sampling – Scrape/destructive sampling is used on hard porous surfaces such as unsealed concrete. The sampling technician will be dressed in the appropriate PPE and will ensure that there are sufficient supplies and equipment available to properly sample all locations required.

At each of the scrape (destructive) sampling points the sampling technician will outline an area 10 cm X 10 cm around the established point. A photograph should be taken before the sample is taken. The surface will be scraped or picked to a depth of about 1 cm, using an appropriate stainless-steel tool. The scraped material will be placed in a pre-cleaned bottle. The bottle will be capped, sealed, and labeled and placed in an ice chest to keep the sample at 4° C. Once the bottle is in the ice chest, the technician should complete the chain-of-custody form and any additional notes in the field log book. An after sampling photograph will be taken. The technician will clean all sampling equipment and change gloves between sampling points.

Attachment 4: Quality Assurance/Quality Control

Quality Assurance / Quality Control

QUALITY ASSURANCE OBJECTIVES

The overall objectives for the Quality Assurance Procedures are as follows:

1. Ensure that the quality data, generated by the study, meets the goals of the investigation.
2. Maintain the value of any data produced in this study as valid evidence in any legal action or suit.
3. Ensure the validity and integrity of the data and results of the site investigation, laboratory analyses, and technical reports.
4. Ensure the site management assessment, actions, and designs are properly prepared and approved.
5. Guide the quality of the specified work performed by all personnel involved in the study

FIELD PROCEDURES

Random Sampling of Potentially Contaminated Areas – Random sample locations will be chosen such that all of the potentially contaminated surfaces have an equal chance of being selected.

To choose sample locations, the width and the length of each wall and floor area subject to sampling will be measured in feet. A grid of one foot squares will be marked off on the surface. Sequential numbers will be assigned to the grid lines beginning with 0 (zero) and ending with the length in each direction. Two random numbers between 0 and the width of the area and 0 and the length of the area. The intersection of the grid lines represented by those numbers will designate a sampling point. The location of each point chosen by this method will be documented and photographed.

Sampling Container Preparation – All sampling containers will be provided by an analytical laboratory certified to perform PCB testing. The containers will be prepared in accordance with all applicable container preparation methods and quality assurance procedures.

Decontamination Procedures – All tools that come into contact with potentially contaminated materials will be decontaminated after each use. The decontamination procedure will include, but not limited to, the following steps.

1. All tools will be rinsed in a PCB compatible solvent and then washed in an Alconox, soapy water solution made from clean water. A brush may be used to facilitate this process.
2. The washed tools will be rinsed in clean water.

3. Rinse and wash water will be changed frequently.
4. Tools will be allowed to air dry before use.
5. Tools may be wrapped in aluminum foil to prevent recontamination during storage or transportation.

All wash and rinse waters as well as any equipment that cannot be decontaminated will be placed in DOT approved, 55 gallon drums, sealed, labeled, and manifested off-site to a licensed PCB disposal facility. Transportation will be by an approved hazardous waste shipping company.

Analytical Laboratory QA/QC – All analyses will be performed by a certified laboratory.

Chemical Analysis Performance Audits – The laboratory manager, in cooperation with the laboratory area supervisors and QA supervisor, will perform individual audits on all aspects of the operation as required. These audits include an evaluation of performance data, control limits, records, and laboratory performance on all check samples and blind QC samples. A report of the audit results, including recommendations, will be forwarded to the director of analytical services, if requested.

Chemical Analyses Data Validation – The data validation process should include a set of computerized and manual checks at various appropriate levels of the measurement process.

The data validation process begins with the laboratory analyst. The analyst will verify, in his/her laboratory notebook, that all method specific operational parameters are utilized and/or met and will also note any and all exceptions. This information will be specifically documented in all instrument logbooks. The analyst will then verify that the equipment is properly calibrated and document this in the instrument logbook. If the operating parameters of a particular method are modified, it will be documented in the analyst's laboratory notebook. Any instrument found to be out of calibration will be identified by the analyst and properly calibrated prior to sample analysis.

The generation of sample analytical data by the analyst includes the generation of quality control data for each sample set. The monitoring of method blanks, sample spikes, method spikes, and sample duplicate analysis is accomplished by adherence to precision and by the accuracy of data for each method. The analyst computes the data precision and accuracy and compares the computed value to the acceptance interval identified for the method. The computed value will in control limits if it lies within the acceptance interval. If the computed value is found to be out of control limits, the data set is not submitted for supervisor approval. The analyst should immediately notify the supervisor and the quality assurance supervisor that an out-of-control condition exists. A joint review is conducted to determine the cause or causes of the out-of-control condition and to determine corrective actions. Once corrective actions have been accomplished, the data set is re-run and the new data is subjected to review as above. If corrective actions are not feasible or cannot be

determined, the data set should be reported as out-of-control limits and so noted in the analyst's logbook.

Accuracy, Precision, and Sensitivity of Chemical Analyses – The fundamental QA objective regarding the accuracy, precision, and sensitivity of laboratory analytical data is to achieve the QC acceptance criteria of the analytical protocols. These QC control limits should be completely met without outliers.

If an out-of-control result occurs, the analyst will identify it as such and report the occurrence to the Group Leader and/or the Area Supervisor. This person will review the corrective action form with the analyst to identify the problem. They will then discuss the corrective actions that need to be taken. The corrective actions will be identified in the analyst's notebook and in writing to the QA Supervisor. The QA Supervisor will review the corrective actions with respect to the new, in-control data point for the same data set.

Transportation Blanks – Transportation blanks or trip blanks are used to evaluate the possibility of contamination of a sample from environmental factors associated with sample transportation, containers, or preservatives. These blanks will be handled and transported in the same manner as the containers used for field samples. Transportation blanks will be collected for each sampling trip. The blanks for these samples will be composed of commercially available sand material that has been previously analyzed for the soil sample parameters.

Equipment / Field Blanks – Field blanks are used by project personnel to evaluate the effectiveness of equipment cleaning operations or to evaluate sample contamination from environmental factors other than the source being investigated.

In order to evaluate the effectiveness of sampling equipment a volume of demineralized and organic free water is placed in, run through, or used to rinse sampling equipment. The water is collected in a properly prepared sampling container, sealed, labeled, and placed in the ice chest with all other samples.

If air contamination is suspected, a properly prepared sample container should be filled with demineralized and organic free water on site. It should then be sealed, labeled, and placed in the ice chest with all other samples.

The number of blanks collected will depend on the scope of the operation. At a minimum, blanks should be collected for each sampling device.

Replicate Samples - Replicate samples or duplicate samples are collected from one sampling point at the same time the original sample is collected. Duplicate samples are not valid for wipe test sampling. At least one Replicate sample should be taken in each area where scrape / destructive sampling is performed. Replicate samples are used to determine the precision of the sampling procedure.

Chain-of-Custody (Field) – A Chain-of-Custody form is used to document sample possession from the time that the sample was taken until it is received by the analytical laboratory sample custodian or coordinator. The sampling technician will initiate the Chain-of-Custody form at the time of sampling. This form will accompany the samples from the field to the laboratory and document each change of possession that occurs during the trip. When samples change hands the releasing individual's signature is placed in the releasing section and the receiving individual's signature is placed in the acquiring section. In general, the fewer people in possession of the samples the better. The Chain-of-Custody process will be followed during all sampling assignments, regardless of the ultimate use of the sample data for this project.

Each record will contain the following information: signature of the collector, date and time of collection, place of collection, type of sample, signatures of all persons involved in the chain of possession, and inclusive dates and times of possession. The field log and final evidence file are also part of the overall Chain-of-Custody requirements for this project.

Documentation and Records – The field technician will properly identify the exact location of the sample taken; the date upon which it was obtained; the type of sample; Whether or not preservative has been used and, if so, what type; the name of the sampler; the client name; and the respective project number. This same information is to be entered into the sampling technician's field sampling log and/or the site logbook and on the sample identification tags. These tags will be filled out neatly with indelible ink and affixed to the sample container. If the field sampler determines that additional information is pertinent to the sample being taken, such data should be recorded in the logbook.

Chain-of-Custody (Laboratory) – All samples for this project will be under strict chain-of-custody procedures from the time they are received at the certified analytical laboratory until all results are reported and sample deposition has been determined. Samples are, thus, traceable through every step of the analytical process.

All samples for this project will be received, at the certified analytical laboratory, by the sample custodian/coordinator. At that time, the custodian will sign the Field Chain-of-Custody, taking possession of the samples. It is the responsibility of this individual to:

1. Determine which analyses are to be performed on the arriving samples.
2. Determine whether or not the samples are viable in nature or require immediate attention.
3. Determine the manner in which those samples will be split, preserved, and stored or routed through the laboratory.

The sample custodian/coordinator's objective is to ensure that the receipt of all samples is consistent with all requirements and that all pertinent information, relative to those samples, is properly and accurately recorded.

Examination of Containers – In addition, the sample custodian is required to inspect all incoming sample containers to ensure the following:

1. Each container is individually and properly sealed.
2. The seals are intact.
3. The sampler's initials are on the seal.
4. The paperwork matches the contents of the container or package.
5. All dates and times are consistent.
6. The description on the paperwork matches the description on the sample container.

Any discrepancies should be noted in the log.

Chain-of-Custody Log-In – All samples received by the certified laboratory must be logged in by the sample custodian/coordinator before work is performed on the samples. The purpose of the log-in procedure, including the assignment of sequential identification numbers to all samples received, is to ensure that the analytical laboratory has a method to track samples, store and retrieve data, and track quality control for any sequence of events during a particular analytical period. This procedure enables the analytical laboratory and Cleanlites to ensure a consistent and documented sequence of events under any analytical situation.

After the sample custodian/coordinator has inspected the shipping containers, the sample container labels, the samples, and all documentation required, he/she will ensure that all pertinent information is entered on the project sheets. At a minimum, the project sheet must contain the following information. Additional information may be added in necessary.

1. Client name (Cleanlites), contact person, and project number
2. Due date
3. Analytical test(s) required
4. Specific project comments
5. Contract number
6. Contract requirements
7. Pricing as required
8. Chain-of-custody requirements
9. Specific report requirements

The sample custodian/coordinator will then complete a chain-of-custody log-in form.

All samples received for the Cleanlites project will be kept in a locked storage area and will be distributed for analysis only when the analyst has signed for the samples on the internal chain-of-custody form. The sample custodian/coordinator or a designated representative

will provide access to the chain-of-custody storage. Records of all movement of all chain-of-custody samples within the laboratory facility will be maintained.

Chain-of-Custody Project Files – All analytical project files will be kept in the project folder in a locked cabinet along with all related documents and paperwork relative to those files and to the project.

Maintenance of Laboratory Custody – Laboratory custody must be consistent with the chain-of-custody requirements from the beginning of sampling to the final report. Every analyst, requiring access to the samples must go through the sample custodian/coordinator, or a designated representative, to gain access to the locked, chain-of-custody sample storage area. The sample custodian/coordinator, or designated representative, will ensure that the analyst signs for the receipt of all chain-of-custody samples on the chain-of-custody log-in form and that the analyst returns and signs in all samples for which the analyst signed out. All samples must be returned to the sample custodian/coordinator and to the locked storage area on the same day they were signed out. No samples will be permitted to remain outside the locked storage area overnight. This documentation, after the completion of all analyses, will be placed in the project file by the sample custodian/coordinator.

Laboratory Custodial Responsibility – It is the responsibility of every laboratory analyst, signing for a sample or samples, to ensure the following.

1. All samples are kept in a minimum access facility and never removed from the laboratory.
2. The samples remain in their possession during the entire period during which they are being analyzed.
3. The samples are returned and signed in to the locked chain-of-custody area on the same day they were signed out.

The analyst will follow any and all other laboratory procedures as required.

Chain-of-Custody Sample Disposal – All samples for the project will be stored in the certified analytical laboratory's locked, chain-of-custody facility until the final report is issued. No chain-of-custody samples will be discarded or otherwise disposed of until written permission is received relative to the disposal of those samples. At such time, all samples will be disposed of in accordance with all applicable rules and regulations.

Laboratory Analyses – The certified laboratory will conduct all analyses in accordance with U.S. EPA's SW-846 "Test Methods for Evaluating Solid Waste" 3rd Ed. Nov. 1086. These procedures incorporate stringent quality control requirements and describe precision, accuracy, calibration criteria, internal standards, and method detection limits.

The following methods, as listed in SW-846, will be used to test Cleanlites samples for PCB contamination.

1. Scrape/Destructive Samples – SW-846 Method 8080
2. Wipe Samples – SW-846 Method 8082A

Figure 1: Cleanlites Facility Diagram

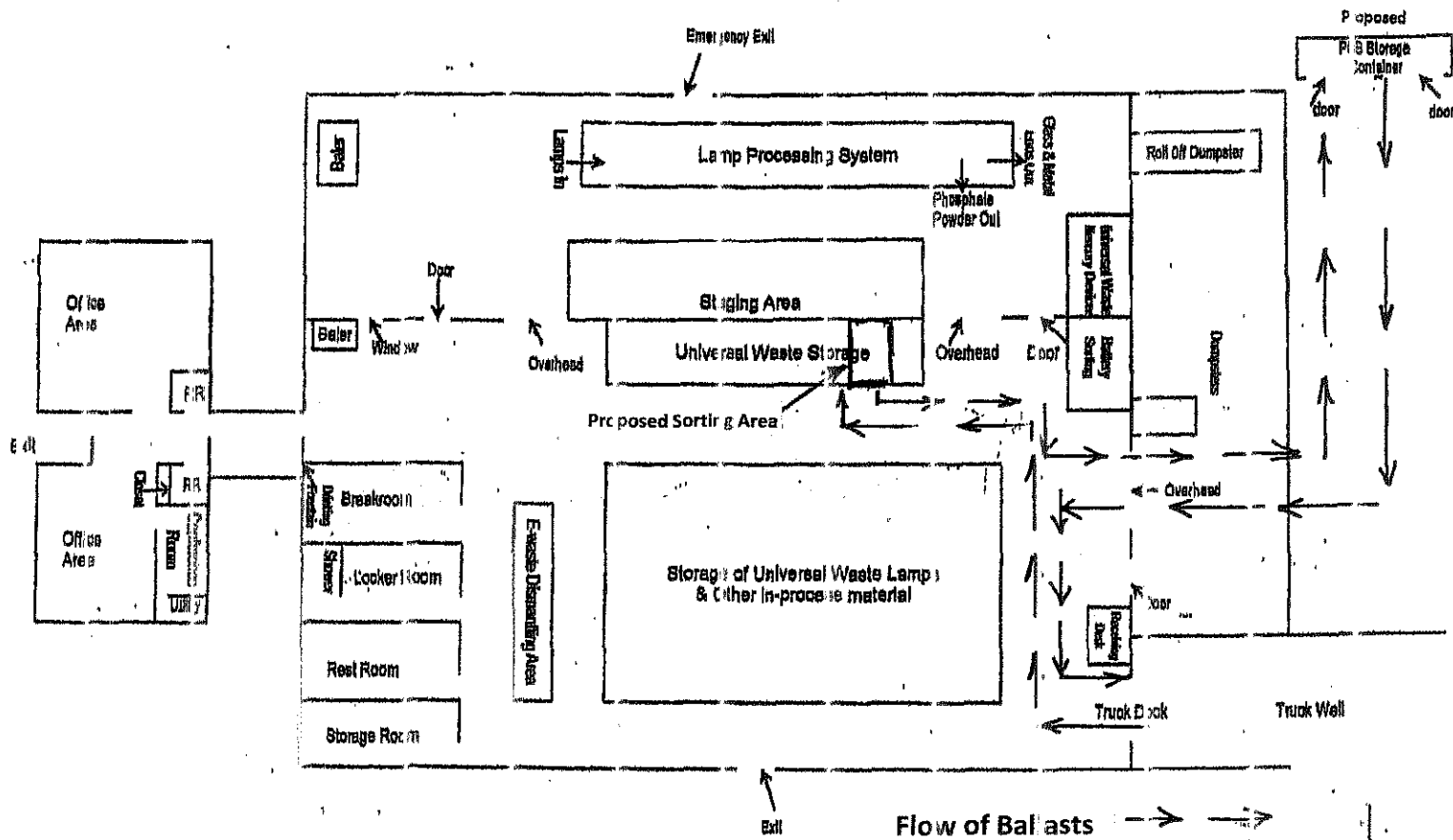


Figure 1 Cleanlites Facility Diagram

USA LAMP & BALLAST RECYCLING, INC
d.b.a. CLEANLITES RECYCLING
665 Hull Road, Mason, MI 48864
(417.678.0044 phone / 517.678.4448 fax)
PLANT LAYOUT

Appendix K PCB Storage Building Inspection Checklist

US EPA ARCHIVE DOCUMENT

Weekly PCB Storage Building Checklist

Date of Inspection _____

Signature of Inspector _____

Any evidence of leakage on or around exterior of PCB Storage Building?

YES NO

Is spacing between drums adequate?

YES NO

Do any containers appear to be leaking?

YES NO

Are container lids in place and free of any residue?

YES NO

Are all containers properly labeled?

YES NO

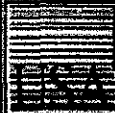
Are there any unusual observations made?

YES NO

Last Shipment Date: _____

Scheduled Next Shipment Date: _____

Appendix L Training



USA Lamp & Ballast Recycling, Inc

Mason, MI • Milton, NY • Cincinnati, OH • Spartanburg, SC

CLEANLITES RECYCLING, INC

888.676.0044 Phone 517.676.4449 fax
cleanlites@cleanlites.com email

EMPLOYEE TRAINING

- HAZWOPER 40-HOUR
- HAZWOPER 8-HOUR
- HAZWOPER SUPERVISORY
- HAZCOM
- SECURITY AWARENESS
- CONTINGENCY PLAN
- LOCKOUT/TAGOUT
- CONFINED SPACES
- CONTROLLED SUBSTANCES
- CONTROLLED SUBSTANCES SUPERVISORY
- DOT HAZMAT
- PPE
- EMERGENCY RESPONSE
- GOOD HOUSEKEEPING
- SPILL PREVENTION & RESPONSE
- MATERIALS HANDLING & STORAGE
- RESPIRATOR FIT TEST
- FORKLIFT
- GENERAL SAFETY GUIDELINES

EMPLOYEE TRAINING

EMPLOYEE NAME: _____

TRAINING DESCRIPTION	DATE	DATE	DATE	DATE	DATE	EMPLOYEE INITIALS	SUPERVISOR INITIALS
Pulmonary Function Test							
Respirator Fit Test							
Forklift Test							
Haz Mat Transportation							
Haz Mat Transportation 8hr refresher							
Hazardous Communication							
Contingency Plan							
Security Awareness							
HAZWOPER 8-HOUR							
Introduction to Hazwoper Retraining							
Personal Protective Equipment and Decontamination Procedures							
Exposure Monitoring and Medical Surveillance							
Understanding Chemical Hazards							

EMPLOYEE TRAINING

EMPLOYEE NAME: _____

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

EMPLOYEE TRAINING

EMPLOYEE NAME: _____

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							