

90-154 16



128 LP Auer Rd. Johnson City, TN 37604

Chris Lamb, EPS
Division of Solid Waste Management, TDEC
Johnson City Field Office
2305 Silverdale Rd.
Johnson City, TN 37601

March 4, 2016

RE: Modify Storage floor plan and airbag recycling procedure for Permit by Rule No. SWP900001510

Dear Mr. Chris Lamb,

This letter is to request a modification to the layout of our storage floor plan. The modifications shall be made per the new attached drawing along with notice that the automotive airbags are completely recycled in house. This modification will not change our total cubic yards of storage space per our permit, the only change will be the location of storage for material in the warehouse, primarily electronics and automotive parts. Please find attached the completed documents for this modification request and updated floor plan drawing. Thank you for your help with this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Barnett", is written over a light blue horizontal line.

Steve Barnett
Vice President TN
Lighting Resources LLC

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**JOHNSON CITY ENVIRONMENTAL
FIELD OFFICE**



DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF SOLID WASTE MANAGEMENT
 312 Rosa L. Parks Avenue, 14th Floor
 Nashville, TN 37243
SOLID WASTE PERMIT BY RULE NOTIFICATION

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1. a. Full, Legal Name of Facility LIGHTING RESOURCES, LLC		Identification Number (Official Use Only)	
b. Facility Mailing Address 128 LPAUER RD. SUITE B	City JOHNSON CITY	State TN	Zip Code 37604
c. Physical Location or Address of Facility 128 LPAUER RD. JOHNSON CITY, TN 37604		County WASHINGTON	
d. Latitude (degrees, minutes, and seconds) N 36° 18' 4.9680	Longitude (degrees, minutes, and seconds) W 82° 23' 42.9036		
e. Name of Facility Manager or Site Operator STEVE BARNETT	Phone Number With Area Code (423) 328-7012		
f. Affiliation of Site Operator (If different from permittee) VICE PRESIDENT TN OPERATIONS			
2. a. Name of Applicant (Corporation, etc.) as Permittee LIGHTING RESOURCES, LLC		Phone Number With Area Code (423) 328-7012	
b. Name of Responsible Official DANIEL GILLESPIE		Phone Number With Area Code (805) 624-3050	
c. Responsible Official's Mailing address 128 LPAUER RD.	City JOHNSON CITY	State TN	Zip Code 37604
3. a. Landowner Name OJ GARDNER		Phone Number With Area Code (423) 928-8351	
b. Landowner Mailing Address PO BOX 5096	City JOHNSON CITY	State TN	Zip Code 37604
c. Signature of Landowner <i>[Signature]</i>		Date 3/4/16	
4. a. Type of Permit-By-Rule Requested:			
<input type="checkbox"/> Coal Ash Facility <input type="checkbox"/> Land Application <input type="checkbox"/> Tire Storage Facility <input type="checkbox"/> Convenience Center <input checked="" type="checkbox"/> Processing Facility <input type="checkbox"/> Transfer Station			
b. Description of Activities and Wastes Handled or Processed: UNIVERSAL WASTE LARGE QTY. HANDLING FACILITY OF LAMPS, BATTERIES, AND MERCURY CONTAINING EQUIPMENT. HANDLER AND PROCESSOR OF E-WASTE AND AUTOMOTIVE AIRBAGS AND OFF SPEC CAR PARTS. HANDLING WILL ALSO INCLUDE, BALLASTS, CAPALITORS, AND MISC RECYCLABLE MATERIAL.			
c. Amount of Waste Handled/Processed/Stored:			
Weight 10 tons/day Volume 125 cubic yards/day Maximum Storage Capacity 798 cubic yards			

5. I certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, and accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Date **3-03-16**

Signature of Responsible Official *[Signature]*

Typed Name of Responsible Official **Daniel P. Gillespie**

Official Title **President Lighting Resources LLC**

Signature of Notary *[Signature]*

Date Commission Expires **Certificate of Acknowledgement**

(Notary Seal)

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California All-Purpose Certificate of Acknowledgment

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California }
County of Ventura } s.s.

On 3/03/2016 before me, Kathy Martin
Name of Notary Public, Title

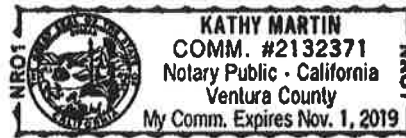
personally appeared Daniel P. Gillespie
Name of Signer (1)

_____ Name of Signer (2)
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Kathy Martin
Signature of Notary Public



Seal

OPTIONAL INFORMATION

Although the information in this section is not required by law, it could prevent fraudulent removal and reattachment of this acknowledgment to an unauthorized document and may prove useful to persons relying on the attached document.

Description of Attached Document

The preceding Certificate of Acknowledgment is attached to a document titled/for the purpose of Solid Waste Permit By Rule Notification containing 1 pages, and dated 3-03-16.

The signer(s) capacity or authority is/are as:

- Individual(s)
- Attorney-in-fact
- Corporate Officer(s) _____ Title(s)

- Guardian/Conservator
- Partner - Limited/General
- Trustee(s)
- Other: President of Company
representing: Lighting Resources LLC
Name(s) of Person(s) Entity(ies) Signer is Representing

Additional Information

Method of Signer Identification

Proved to me on the basis of satisfactory evidence:
 form(s) of Identification credible witness(es)

Notarial event is detailed in notary journal on:

Page # 3 Entry # 1

Notary contact: 805-432-6181

Other

Additional Signer Signer(s) Thumbprints(s)



128 LP Auer Rd Ste. B
Johnson City, TN 37604
423-328-7012

Chris Lamb, EPS
Division of Solid Waste Management, TDEC
Johnson City Field Office
2305 Silverdale Rd.
Johnson City, TN 37601

March 4, 2016

RE: Waste tracking records for permit by rule.

Narrative of Waste Tracking for permit.

Lighting Resources LLC as the permittee shall keep the following records for the waste received on a monthly bases. These records and logs will be available for review by the department upon request and at time of inspections.

The records shall include the following:

1. *Inventory on the First Day of the Month;*
2. *Amount Received;*
3. *Amount Processed;*
4. *Amount Shipped Offsite as Waste;*
5. *Amount Shipped Offsite as Product; and,*
6. *Inventory on the Last Day of the Month.*

Please see attached: Example spread sheet

Best Regards,

A handwritten signature in blue ink that reads "Steve Barnett".

Steve Barnett
Vice President TN
Lighting Resources, LLC

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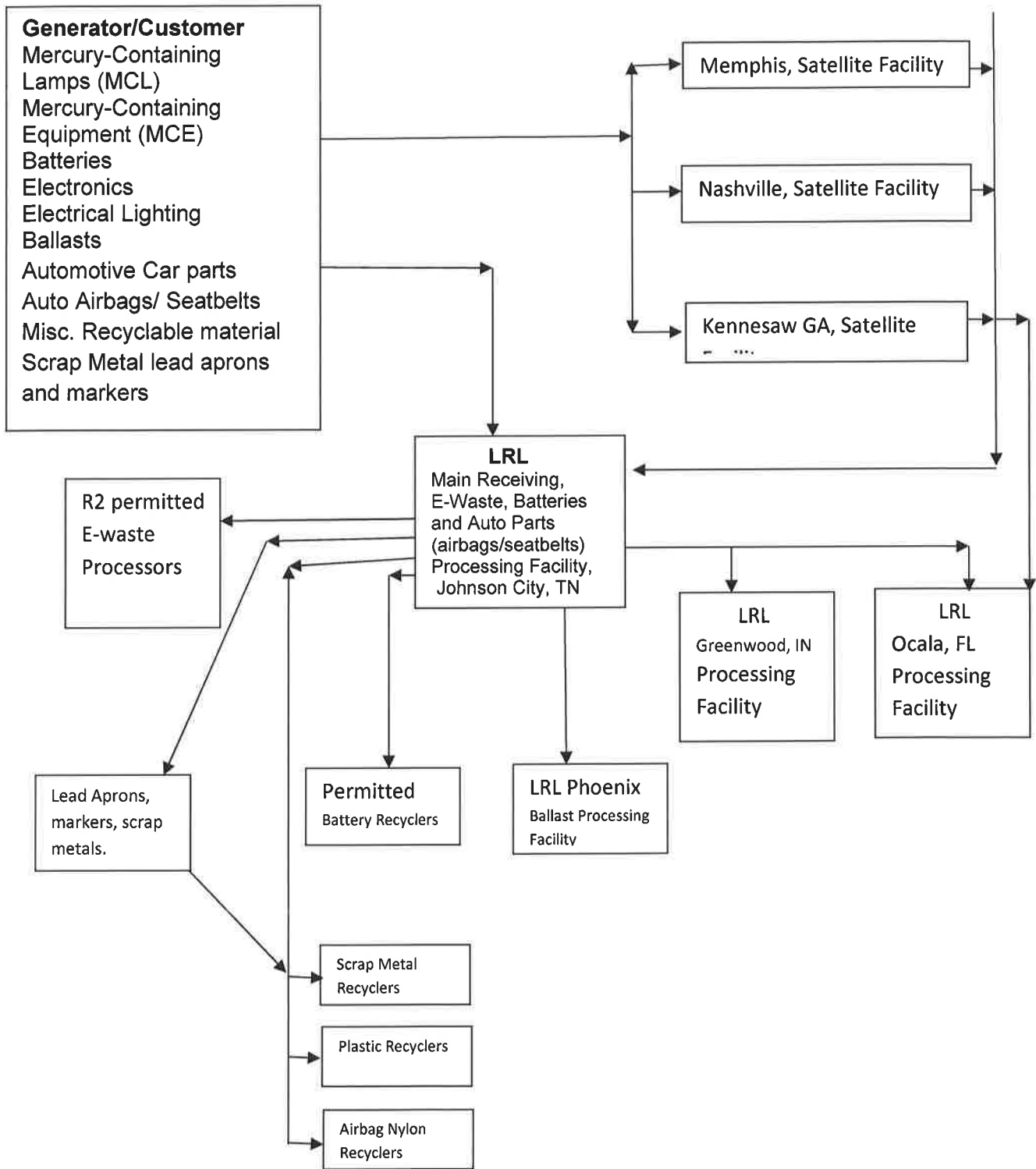
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Monthly Waste Inventory Sheet

<i>Year</i>	2016								
<i>Month</i>									
Lamp Type	Inventory at Beginning of Month	Amount Received	Amount Processed	Amount Shipped Offsite for processing	Amount Shipped Offsite as Waste	Inventory at End of Month	Permit Limit	Units	
Straight Tubes, 4'								lbs	
Straight Tubes, 8'								lbs	
Shatter Shields								lbs	
Crushed Lamps								lbs	
U-shaped								lbs	
HID								lbs	
CFL								lbs	
Incandescent								lbs	
Ultra Violet								lbs	
Projector Lamps								lbs	
Total								0	lbs

MATERIALS FLOW DIAGRAM FOR LIGHTING RESOURCES, LLC ("LRL")



Lighting Resources LLC (LRL)
128 LP Auer Rd
Johnson City, TN 37604

LRL's Main Receiving/ Processing Facility is located at 128 L P Auer Rd. Johnson City, TN 37604. The LRL facility is registered as a Large Quantity Handler of Universal Waste and Transfer Facility of certain other lighting waste under EPA ID # TNR 000039925. No other hazardous wastes will be managed at this facility. At the LRL Main Receiving Facility, materials will be managed as follows:

- Mercury-containing lamps will be accumulated and transferred to the LRL Universal Waste Processing Facility in bulk via LRL trucks. No processing of mercury-containing lamps will occur at this receiving facility except potentially some sorting and re-packaging.
- Mercury-containing equipment will be accumulated and transferred to the LRL Universal Waste Processing Facility for retorting. No processing of such MCE will occur at this receiving facility except potentially some hand sorting and re-packaging – especially of leaking or damaged MCE. Occasionally LRL may receive pure liquid mercury (scrap metal mercury). Upon receiving of this product the liquid mercury will be contained in approved steel mercury flask and sent to LRL's retort facility for triple distillation and sold as new product for reuse in the manufacturing of new products.
- All batteries, including alkaline, will be sorted by hand and accumulated in appropriate containers, and subsequently shipped off-site in economically sized shipments to properly permitted and authorized battery reclamation facilities. No other processing of such materials will take place at LRL's facilities.
- Lighting Ballast: As the permittee LRL will comply with all applicable requirements of 40CFR part 761 regarding the management of Polychlorinated Biphenyls (PBC's). Electrical lighting ballasts will be sorted by hand into PCB-containing ballasts, and Non-PCB containing ballasts, and others, and accumulated in containers into economically sized shipments. PCB ballast will be shipped to LRL's permitted PCB processing facility. No other processing of such materials will take place at LRL's facilities.
- Discarded Electronics received at LRL will be weighted and logged on the inventory sheet, and then moved to the LRL Electronics Processing area for hand sorting and recycling. Certain types of Electronic equipment will be disassembled by hand using power and hand tools collecting metals, circuit boards, wire, copper, plastic, and other recyclable components. Future shredding equipment installed at LRL's facility will be used to shred hard drives and devices holding data for total destruction. These recovered components will be sold as scrap for further recycling. Some discarded electronics after sorting and palletizing by type will be accumulated into economically sized shipments and subsequently shipped off-site to properly

authorize recycling facilities for recycling, refurbishment and reuse, or metals reclamation. Except for sorting and re-packaging, no processing of CRT monitors or CRT TV's will be done at this facility.

- Automotive parts including airbags and seatbelts will be disassembled by hand by using power and hand tools recovering metals (aluminum, steel, etc.), circuit boards, nylons, and plastic. Some automotive parts may be shredded for destruction to assure they can no longer be used. These recovered materials will be sold as scrap for further recycling.
- Capacitors: From time to time LRL may receive or recover NON-PCB capacitors by disassembling certain types of Electronic waste. These capacitors will be sorted by hand and accumulated for sale as non-ferrous metals (primary aluminum).
- Misc. Recyclable Material: From time to time on rare occasions LRL may receive scrap metal articles for recycling, consisting of lead aprons and lead markers. The lead aprons and lead markers are sorted and weighed in by hand when received. This material is then sent appropriate scrap metal recyclers for the recycling and recover of the lead.

Records/Documentation

Lighting Resources LLC as the permittee shall keep the following records for the waste received on a monthly basis. These records and logs will be available for review by the department upon request and at time of inspections.

The records shall include the following:

1. Inventory on the First Day of the Month;
2. Amount Received;
3. Amount Processed;
4. Amount Shipped Offsite as Waste;
5. Amount Shipped Offsite as Product; and,
6. Inventory on the Last Day of the Month.

See attached spreadsheet for example monthly inventory tracking record.

RE: Automotive Airbag Recycling

This letter is to address the recycling process of automotive airbags performed here at Lighting Resources Inc. (LRL) in Johnson City, TN.

The Recycling Process:

Airbags and seat belt units are disassembled recovering the, charge unit, nylon bag or seat belt strapping, metal, and plastic.

After the airbags/ seat belts are disassembled the charge units are electrically discharged in a controlled deployment room. The deployed charge unit then is recycled as scrap metal.

This process recovers three (3) recyclable scrap commodities,

1. Scrap metal
2. Plastic
3. Scrap Nylon

LRL has 100% recover and reclamation of the airbags modules that we process and recycle, there is zero landfill of a recycled airbag modular.

Permit By Rule Facility Answers for: LRL's 128 LP Auer Rd. Facility

(2) Permits by Rule

- (a) All permit by rule facilities shall keep any records that are required by these rules and a copy of its permit by rule authorization at the facility or at another location approved by the Department. Notwithstanding any other provision of this rule, except for subparagraph (1) (c) of this rule, and provided they are not excluded pursuant to part (1)(b)3 of this rule, the following classes of activities shall be deemed to have a permit by rule if the conditions listed are met:

1. A processing facility, if:

- (i) The operator complies with the notification requirement of subparagraph (b) of this paragraph;

The facility's operator has filed the proper notification form and is attached to this application

- (ii) The facility is constructed, operated, maintained, and closed in such a manner as to minimize:

- (I) The propagation, harborage, or attractions of flies, rodents or other disease vectors;

No, none of the materials processed have any food value or odor that would attract flies, rodents, or other disease vectors.

- (II) The potential for explosions or uncontrolled fires;

No, no flammable or explosive materials are used in recycling process

- (III) The potential for releases of solid wastes or solid waste constituents to the environment except in a manner authorized by state and local air pollution control, water pollution control, and/or waste management agencies; and

The only processing of lamps and batteries done at this facility, is only the sorting and segregation of certain lamp types and sorting of different types of batteries by chemical type. All lamps are then sent to the destination facility for processing. Batteries are shipped out to permitted battery recyclers after sorting.

Other waste accepted at this facility is electronic waste, (E-waste) along with automotive off spec parts, automotive airbags (commercial off spec. products), Lighting Ballast (Non-PCB and PCB), Non-PCB Capacitors, Misc. recyclable scrap metals (lead aprons and lead markers), and universal waste mercury containing equipment (MCE). All waste is solid, primary consisting of plastic, scrap metal, copper, aluminum, lead, etc. Sorting and disassembling of some E-waste and Airbags is done at the facility on limited items. All other E-waste is sorted and shipped to other permitted (R2) processors for further recycling. All recovered commodity scrap (wire, metal, plastic, boards, copper, alum. etc.) is sold to local or domestic vendors. No disassemble of MCE devices is done at this facility, the only processing of MCE's will be sorting and weighing. The MCE's are sent to our retort facility in Greenwood, IN for retorting and recycling.

- (IV) The potential for harm to the public through unauthorized or uncontrolled access;

No, facility is locked after hours and has a 24 hour security.

- (iii) The facility has an artificial or natural barrier which completely surrounds the facility and a means to control entry, at all time, through the gate or other entrances to the facility;

All recycling/sorting of materials is conducted inside. Visitors are not allowed in the facility without facility personnel.

- (iv) The facility, if open to the public, has clearly visible and legible signs at the points of public access which indicate the hours of operation, the general types of waste materials that either will or will not be accepted, emergency telephone numbers, schedule of charges (if applicable), and other necessary information;

Facility is not open to public, site visits are by appointment only.

- (v) Trained personnel are always present during operating hours to operate the facility;

No one but trained employees have access to the building. Employees are trained in operations of equipment, hazardous waste right to know policy, respirator training, OSHA training, etc.

- (vi) The facility has adequate sanitary facilities, emergency communications (e.g., telephone), and shelter available for personnel;

Yes, facility has 3 rest rooms, 3 phones throughout the building, fire extinguishers, smoke and heat detectors.

- (vii) The facility's access road(s) and parking area(s) are constructed so as to be accessible in all weather conditions:

Yes, public paved roads lead to the facility and all parking and driveways are paved and graveled

- (viii) Except for composting facilities utilizing landscaping and land clearing wastes only, all waste handling (including loading and unloading) at the facility is conducted on paved surfaces;

All operations are conducted on hard surfaces of concrete.

- (ix) There is no storage of solid wastes at the facility except in the containers, bins, lined pits or on paved surfaces, designated for such storage;

All Universal Waste lamps, batteries, ballast, capacitors, misc. recyclable material and MCE's for recycling are kept inside at all times and contained in appropriate containers (boxes, drums). All material is received on numbered tracking BOL's for each customer, these are tracked by the date and time they

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FIELD OFFICE

are received and sent for processing. All E-waste and automotive parts are kept inside at all times and contained in appropriate containers (boxes, drums). All material is received on numbered tracking BOL's for each customer, these are tracked by the date and time they are received. Tracking logs will be available for the department to review anytime.

- (x) Except for incinerators or energy recovery units, there is no burning of solid wastes at the facility;

Nothing is incinerated;

- (xi) There is no scavenging of solid wastes at the facility and any salvaging is conducted at safe, designated areas and times;

There will be no scavenging of any materials at this facility at any time.

- (xii) Wind dispersal of solid wastes at or from the facility is adequately controlled, including the daily collection and proper disposal of windblown litter and other loose, unconfined solid wastes;

None, all processing and sorting is conducted inside of facility.

- (xiii) All liquids which either drain from solid wastes or are created by wash down of equipment at the facility go to either:

All waste is dry. No waste is exposed to water or liquids. No water is used in the operations

- (I) A wastewater treatment facility permitted to receive such wastewaters under T.C.A § 69-3-101 et seq. (Tennessee Water Quality Control Act, or
(II) Other methods approved by the Commissioner.

- (xiv) The facility receives no special wastes unless:

The facility does not accept any special waste for processing, only accepts Universal Waste Lamps (fluorescent tubes, HID, CFL, U-Shapes, etc.) and Universal Waste Batteries (all types), E-waste, automotive off spec. parts and automotive airbags/seatbelts along with some lighting ballast, capacitors and UW mercury containing equipment, and misc. recyclable materials (scrap metal lead aprons and lead markers). LRL will and has always contacted the Department to either authorize the recycling or not to accept.

- (I) Such receipt has been specifically approved in writing by the Department, and

- (II) Special procedures and/or equipment are utilized to adequately confine and segregate the special wastes;
- (xv) The operator can demonstrate, at the request of the Commissioner, that alternative arrangements (e.g., contracts with other facilities) for the proper processing or disposal of the solid wastes his facility handles are available in the event his facility cannot operate;

Yes, The facility has written agreements with other permitted Universal Waste Processing facilities to properly recycle Universal Waste lamps and batteries, and MCE's in the event LRL cannot process their current inventory.

Yes, The facility has written agreements with other permitted E-waste processing facilities to properly recycle E-waste in the event LRL cannot process their current inventory along with facilities to process auto airbags/seatbelts. All other misc. recyclable materials (scrap metals, ballast, capacitors) will be sold as scrap metal.

- (xvi) The facility has properly maintained and located fire suppression equipment (e.g., fire extinguishers, water hoses) continuously available in sufficient quantities to control accidental fires that may occur;

Yes the facility has fire extinguishers located throughout the facility. The Johnson City Fire Department members from the Main St. Fire Station have visited our facility for tours and inspections.

- (xvii) All waste residues resulting from processing activities at the facility are managed in accordance with the Chapter or Chapter 0400-12-01 (Hazardous Waste management), whichever is applicable, and/or with any other applicable state or federal regulations governing waste management;

Yes, the facility does not generate a hazardous waste, however all residues are properly managed per the UW rule.

- (xviii) The facility is finally closed by removal of all solid wastes and solid waste residues for proper disposal. The operator must notify the Division Director in writing of his completion of closure of the facility. Such notification must include a certification by the operator that the facility has been closed by removal of all the solid waste and residues. Within 10 days of such verification, the Commissioner shall approve the closure in writing to the operator. Closure shall not be considered final and complete until such approval has been made.

In the event of a closure the facility will notify the Division Director and follow the steps above for proper closure.

- (xix) New solid waste processing facilities shall not be located in wetlands, unless the owner or operator makes the applicable demonstrations to the Commissioner as referenced at subparagraph (2)(p) of Rule 0400-11-01-.04.

Existing facility, not in wetlands.

- (xx) The facility must not be located in a 100-year floodplain unless it is demonstrated to the satisfaction of the Commissioner that:

Facility is not located in a 100-year floodplain. See the attached map, I included the FEMA flood map for the area.

- (I) Location in the floodplain will not restrict the flow of the 100-year flood nor reduce the temporary water storage capacity of the floodplain.

N/A

- (II) The facility is designed, constructed, operated, and maintained to prevent washout of any solid waste.

Facility is not located in a 100-year floodplain

- (xxi) The facility does not:

This is an existing facility and no new construction is proposed

- (I) Cause or contribute to the taking of any endangered or threatened species of plants, fish, or wildlife; or
- (II) Result in the destruction or adverse modification of the critical habitat of endangered or threatened species.

- (xxii) The owner/operator may not store solid waste until the processing equipment Has been installed on-site and is ready for use.

No Special equipment is required, only material handling equipment (forklift , pallet jacks, etc.), and hand tools for disassembly

- (xxiii) The owner/operator of a solid waste processing facility which has a solid waste storage capacity of 1000 cubic yards or greater shall file with the Commissioner a performance bond or equivalent cash or securities, payable to the State of Tennessee. Such financial assurance is intended to ensure that adequate financial resources are available to the Commissioner to insure the proper operation, closure, and post closure care of the facility. The types of financial assurance instruments that are acceptable are those specified in subparagraph (3)(d) of Rule 0400-11-01-.03. Such financial assurance shall meet the criteria set forth in T.C.A § 68-211-116(a) and at subparagraph (3)(b) of Rule 0400-11-01-.03.

The facility has less than 1000 cubic yards of storage space. As indicated per the attached floor plan the facility floor will be marked using floor tape indicating each storage space. These spaces will be scaled per the drawing and named per the type of waste, i.e. lamps, batteries, E-waste, airbags, ballast, misc. recyclable material, etc.

- (xxiv) The owners or operators proposing a new solid waste processing facility that handles putrescible wastes located within 10,000 feet (3048 meters) of any airport runway end used by turbojet aircraft or within 5,000 feet (1524 meters) of any airport runway end used only by piston-type aircraft must include in the permit-by-rule notification

a demonstration that the facility does not pose a bird hazard to aircraft. The owners or operators proposing a new solid waste processing facility that handles putrescible wastes located within a five-mile radius of any airport runway end used by turbojet or piston-type aircraft must notify the affected airport and the appropriate Federal Aviation Administration (FAA) office.

The facility is more than 5 miles from the nearest airport.



Google

**Lighting Resources LLC
128 LP Auer Rd. Johnson City, TN**

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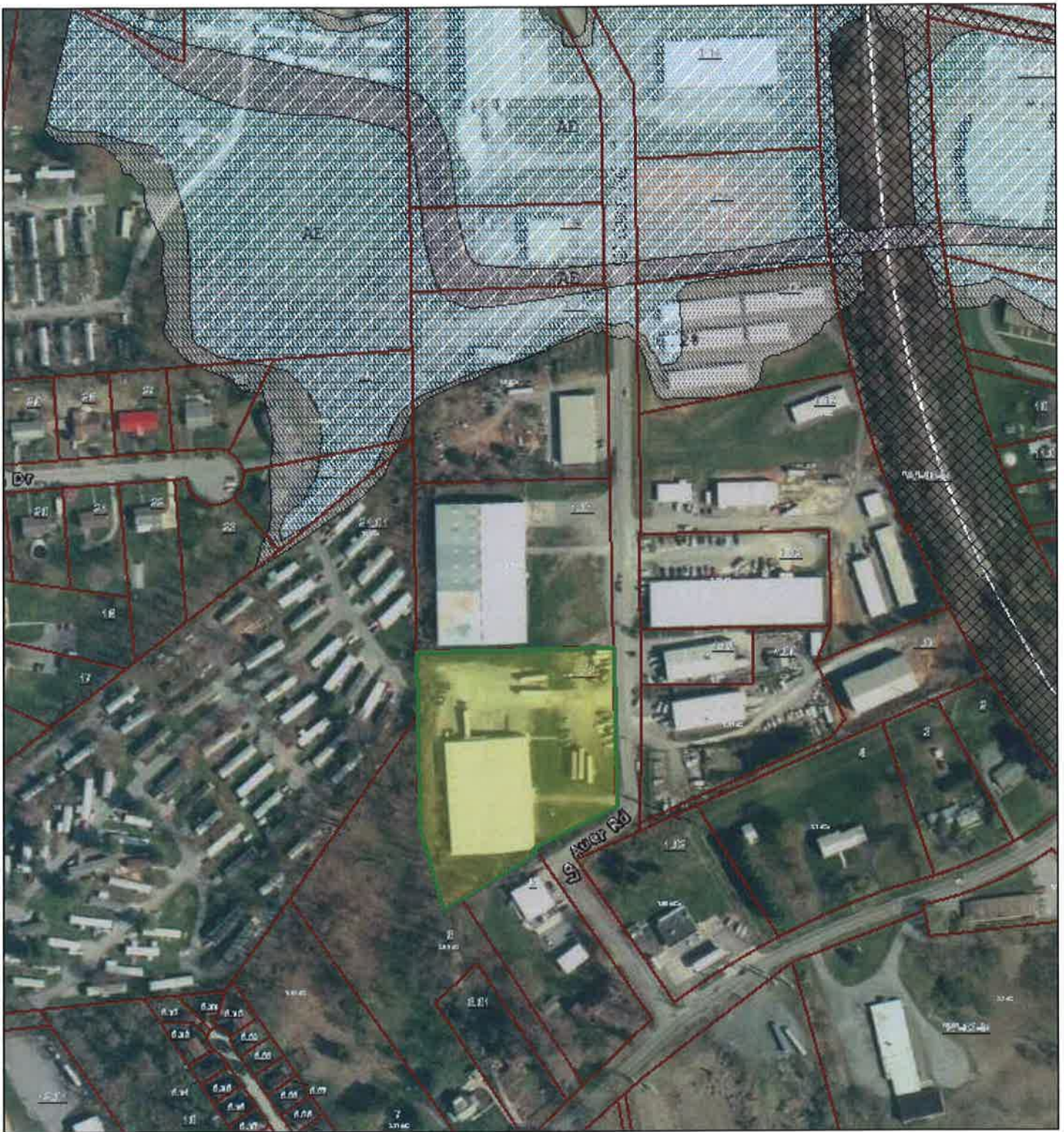
**Facility Inventory Storage Space Permitted
Pounds = Cubic Yards Tracking**

**JOHNSON CITY ENVIRONMENTAL
FIELD OFFICE**

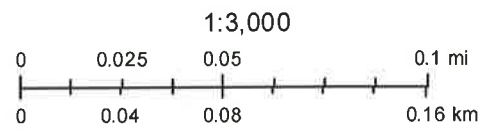
Material	Total Max Lbs. for Storage	Avg. Lbs. Per Cubic Yard	Permit Limit (cubic yards)
Flour. Tubes – 4ft & 8ft	56994 lbs.	322 lbs.	177
HID lamps	5080 lbs.	254 lbs.	20
CFL lamps	5440 lbs.	272 lbs.	20
U-Shape	5168 lbs.	272 lbs.	19
Shielded & Misc.	24131 lbs.	409 lbs.	59
E-waste	162660 lbs.	505 lbs.	322
Batteries	50000 lbs.	925 lbs.	54
Auto / Airbags/ Seatbelts	56770 lbs.	811 lbs.	70
Mercury Equip/ Elemental	700 lbs.	233 lbs.	3
Ballasts / Capacitors	41580 lbs.	945 lbs.	44
Misc. Recyclable Material (Scrap metal lead aprons, etc.)	10000 lbs.	1052 lbs.	9.5
		Total	798 cubic yards



Washington County - Parcel: 053L B 001.13



September 1, 2015











Lighting Resources, LLC

Corporate Office 1919 Williams St. #350, Simi Valley, CA 93065 Phone: 805-624-3050 Fax: 805-285-0659

President	Daniel P. Gillespie	daniel.gillespie@lightingresourcesinc.com
VP Sales & Customer Service	Ron Hughes	ron.hughes@lightingresourcesinc.com
Chief Financial Officer	Kari Porter	kari.porter@lightingresourcesinc.com
Chief Compliance Officer	Susan Richard	susan.richard@lightingresourcesinc.com
Human Resources Officer	Shirlane Wardell	shirlane.wardell@lightingresourcesinc.com
Accounts Payable	Sedie Rad	sedie.rad@lightingresourcesinc.com
Accounts Receivable	Renee Pacheco	Renee.Pacheco@lightingresourcesinc.com

Federal ID:	NAICS:	USDOT:	USDOT HAZMAT ID: 057064	DUNS:
25-1905692	562211, 562920, 562219	568970	Reg. # 060313 600 054VX	79-041-3074
	Ballast Processing EPA ID#: AZD 983476680 1522 E Victory Street #4, PHX, AZ 85040 RCRA Transfer Facility EPA ID# AZD983469594 1545 E Victory St., PHX, AZ 85040 Metal Recovery Oven EPA ID#: AZW000510529 3540 S 16 th Street, PHX, AZ 85040	Phone: 602-276-4278 Fax: 602-276-5432 Toll-Free: 800-866-6818 Manager: Sean Higgins sean.higgins@lightingresourcesinc.com Sales: Ryan Mager Ryan.mager@lightingresourcesinc.com		
	Lamp Processing Facility 805 E Francis Street Ontario, CA 91761 EPA ID#CAR000156125 Standardized Hazardous Waste Facility Permit, Series A; SCAQD Permits: D72530, G22757 CA Hazardous Waste Transporter: 3379	Phone: 909-923-7252 Fax: 909-923-7510 Toll Free: 888-923-7252 Sales Manager: Erika Ramirez erika.ramirez@lightingresourcesinc.com Operations Manager: Jose Ascencio Jose.ascencio@lightingresourcesinc.com Customer Service: Danielle Rosales danielle.rosales@lightingresourcesinc.com		
	Lamp Processing Facility 1007 SW 16 th Lane Ocala, FL 34471 EPA ID#: FLR 000 070 565 Operating Permit: 0309339-HO-002, Marion County	Phone: 352-509-3001 Fax: 352-509-3012 Toll-Free: 855.502.3001 Manager: Jason Muhlenkamp Jason.muhlenkamp@lightingresourcesinc.com Operations Manager: Buff Fritz buff.fritz@lightingresourcesinc.com Sales & Logistics Coordinators: Melanie Jordan, Melanie.jordan@lightingresourcesinc.com Dustin Hickey dustin.hickey@lightingresourcesinc.com Customer Service: Rosemarie Knox Rosemarie.knox@lightingresourcesinc.com		
	Lamp Processing & Retort Facility 498 Park 800 Drive Greenwood, IN 46143 EPA ID#: IN0 000 351 387 Hazardous Waste Management permit Part B Container Storage Area IDEM OAQ Permit #: F081-23235-00030	Phone: 317-888-3889 Fax: 317-888-3890 Toll-Free: 866-375-7340 Manager: Adam Roberts adam.roberts@lightingresourcesinc.com Operations Manager: Rick Miller rick.miller@lightingresourcesinc.com Logistics Coordinator: Joe Meade joe.meade@lightingresourcesinc.com Sales: Allison Gross Allison.Gross@lightingresourcesinc.com Abigail Hallett abigail.hallett@lightingresourcesinc.com		
	EZ on the Earth Prepaid Box Program 449 Park 800 Drive Greenwood, IN 46143	Phone: 317-887-5102 Fax: 317-887-5104 Toll-Free: 855-327-8455 Vice President, Strategic Marketing: Bruce Knight bknight@ezontheearth.com Operations Manager: Shawn Page spage@ezontheearth.com Customer Service: Stephanie Soots Stephanie.soots@ezontheearth.com		
	Transfer Facility 128 LP Auer Road Johnson City, TN 37604 EPA ID#: TNR000039925 Large Quantity Handler	Memphis Satellite 2709 Barris Memphis, TN 38132 901-412-0324 EPA# TNR000039982	Phone: 423-328-7012 Fax: 423-328-7631 Vice-President, TN Steve Barnett Steve.barnett@lightingresourcesinc.com Operations Manager: Jon Barnett Jon.barnett@lightingresourcesinc.com Memphis: David Wages: david.wages@lightingresourcesinc.com	
	LRT Texas: Lamp Processing Facility 101 E Bowie Street Fort Worth, TX 76110 EPA ID#: TXD 008 029 191 Registered Large Quantity Handler	Phone: 817-921-1440 Fax: 817-921-1504 Toll Free: 877-344-8468 Manager: Thomas Slattery thomas.slattery@lightingresourcesinc.com Logistics Coordinator: Sherry Foster sherry.foster@lightingresourcesinc.com Sales: Brian Anderson brian.anderson@lightingresourcesinc.com Pat Marchese pat.marchese@lightingresourcesinc.com Customer Service: June Belcher June.belcher@lightingresourcesinc.com		

For more information about our services, visit our website at lightingresourcesinc.com

Chris Lamb, EPS
Division of Solid Waste Management, TDEC
Johnson City Field Office
2305 Silverdale Rd.
Johnson City, TN 37601

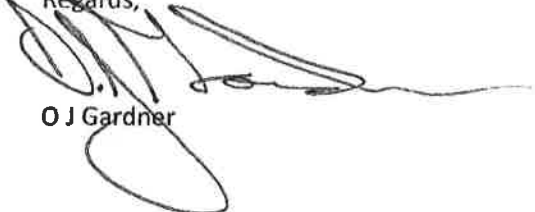
September 1, 2015

Mr. Lamb,

I, O J Gardner am the property owner of the warehouse structure occupied by Lighting Resources, LLC located at 128 LP Auer Rd. Suite B, Johnson City, TN 37604.

This letter gives authority to TDEC, Division of Solid Waste Management to enter the above mentioned locations for inspections of Lighting Resources, LLC. operations.

Regards,


O J Gardner