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

February 21, 2019

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

Dear Mr. Chris Lamb,

This letter is to request a modification to our storage floor plan and modify our acceptance of certain airbag inflators and modules. The modifications shall be made per the new attached drawing. This modification will change our total cubic yards of storage space per our permit.

This modification will clarify the acceptance of airbag inflators and modules that LRL will accept for processing and recycling. No TAKATA or other manufacture's airbag modules or inflators that are subject to a recall due to an explosive, shrapnel-producing defect, will knowingly be accepted. No used inflators or modules that are classified as D001/D003 waste will be accepted by LRL. LRL will require its customers/generators of airbag inflators/modules to certify that the airbags/modules they ship are not in the Takata recalled family. LRL will keep these certifications for each shipment on file for the departments review.

Please find attached the completed documents for this modification request and updated floor plan drawing. Thank you for your help with this matter.

Sincerely,

Steve Barnett Vice President TN

Lighting Resources LLC

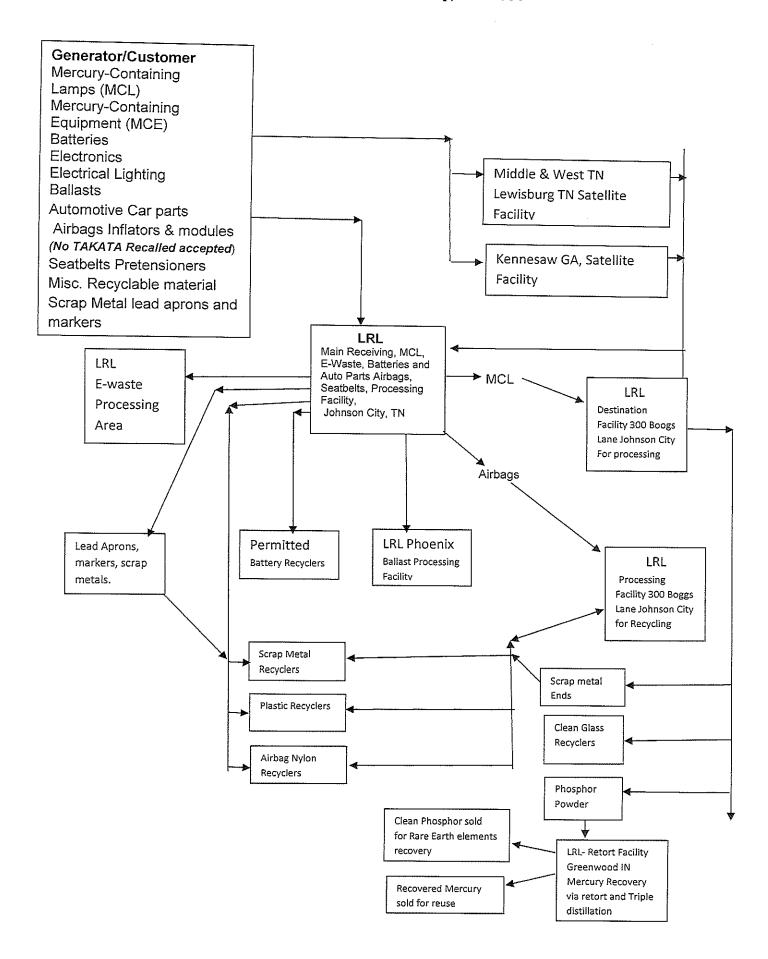


STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF SOLID WASTE MANAGEMENT
WILLIAM R. SNODGRASS TENNESSEE TOWER
312 ROSA L. PARKS AVENUE, 14TH FLOOR
NASHVILLE, TN 37243

SOLID WASTE PERMIT BY RULE NOTIFICATION

1. TYPE OF PERMIT- BY- RULE REQUEST	ED			ID# TDEC	USE ONLY
COMPOST FACILITY	LAND APPLICATION	TIRE STOR	AGE FACILITY		
CONVENIENCE CENTER	PROCESSING FACILITY	TRANSFER	STATION		
2. FACILITY INFORMATION		TO FERT THE PERMIT AS		FACILITY LO	CATION COUNTY
FULL LEGAL NAME OF FACILITY				Washi	ngton
Lighting Resources LLC		±.		18.2938	DECIMAL DEGREES)
PHYSICAL LOCATION OR ADDRESS OF FACILITY		STATE		The Device of the Control of	(DECIMAL DEGREES)
128 LP Auer Rd	Johns	son City TN	37604	-82.3397	
FACILITY MAILING ADDRESS	CITY	STATE	ZIP	FACILITY EN	1AIL
128 LP Auer Rd	Johns	son City TN	37604		
FACILITY MANAGER OR SITE OPERATOR	PHONE (WITH AREA CO	DE) AFFILIATION OF	SITE OPERATOR (II	F DIFFERENT	FROM PERMITTEE)
Jon Barnett	(423) 328-959	6 TN Facil	ities Mana	ger	
3. APPLICANT (PERMITTEE)			774 A.H. 401.39	ijid exit	W \$100 100 90 W 8 W
APPLICANT NAME		E (WITH AREA CODE)	EMA	10.17	
Steve Barnett	(423	3) 534-6717	steve.barnett(@lighhtin	gresourcesinc.com
RESPONSIBLE OFFICIAL / TITLE	PHONI	E (WITH AREA CODE)	EMA	IL	
Vice President TN	(423		steve.barnett	@lighting	gresourcesinc.com
RESPONSIBLE OFFICIAL MAILING ADDRESS		CITY	Percent 12000	STATE	ZIP
128 LP Auer Rd	II	Johnson		TN	37604
LANDOWNER NAME	LANDOWNER MAILING		CITY		STATE ZIP
OJ Gardner	P O Box 509	0	Johnson C	ity	TN 37604
Soft Kill					1/28/19
LANDOWNER SIGNATURE	LANDOWNER SIGNATUR	E LANE	OOWNER SIGNATU	RE	DATE
4. WASTE HANDLING	TOTAL SECTION	. Manua emagra			
DESCRIPTION OF ACTIVITIES AND WASTES HAN		AMOUNT OF WASTE	HANDLED, PROCES	SED OR STO	DRED
UW large Quantity handler and processor of Lamps containing equipment, Handler and processor of , E	s, batteries, mercury	30.00	125.00		945.00
airbags, lighting ballast, capacitors, off spec.electro	nic auto parts, consumer	WEIGHT		LUME	STORAGE MAX
electronics, scrap metal lead , and non-haz. misc re	ecycables. (plastics, etc.)	TONS / DAY		S / DAY	CU YARDS
5. CERTIFICATION REQUIRED					
I certify under penalty of law that this documer information is to the best of my knowledge and	nt and all attachments w d belief, true, accurate, a	ere prepared by me, on nd complete. I am aw	or under my directi are that there are	on or super significant r	vision. The submitted
false information, including the possibility of fi	ne and imprisonment.	As specified in Tennes	see Code Annotate	d Section 3	9-16-702(a)(4), this
declaration is made under penalty of perjury.	- 1 , -				
QUELA GRASS	- Dunto		Steve Ba	rnett	
SIGNATURE OF RESPO	ONSIBLE OFFICIAL		PRINTED NAME		
TENNESSEE Vice Preside	ent TN		1-28	-19	
NOTARY PUBLIC PHILE			DATE		
	1		annes M. Mare		
	Y/-		Sept	5.2	02/ 3
commission Expires september 5, 2021 (NOTARY SEAL) SIGNATURE OF NOTA	KY V		DATE COMMISSION		<u>Od </u> FD10211

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

January 20, 2019

RE: Waste acceptance and tracking records for permit by rule.

Narrative of Waste Acceptance

Lighting Resources LLC (LRL) main receiving, large quantity Universal Waste handler, and processing facility located is 128 LP Auer Rd. Johnson City, TN 37604. LRL shall only accept the following waste for recycling and processing.

Universal Waste Lamps, Batteries, Electronic Waste, off spec. auto parts, lighting ballast (Non PCB and PCB) UW mercury containing equipment, recyclable scrap metals (lead aprons, and lead markers) Consumer electronics, seatbelt pretensioners, airbag inflators and modules.

Please Note: LRL will only accept 1) unused airbag modules and inflators that fail QA/QC programs and have never been installed in an automobile for sale. 2) used intact airbags modules that can safely undergo electronic deployment to recover a useable product. (i e.) *Scrap metal, plastic, nylon*

LRL will not knowingly accept any TAKATA or other manufacture's airbag modules or inflators that are subject to recall due to explosive, shrapnel-producing defect that cannot safely be electronically deployed. The EPA and DSWM prohibits the reclamation of non-Takata used airbag inflators that cannot or will not be reused due to the fact established by the EPA that used inflators outside the module cannot be safely deployed. LRL will not accept used airbag inflators that cannot be reused or safely deployed. (See attached Certification Form)

No airbag inflators or modules will be processed at the LRL 128 LP Auer Rd. facility. They will only be received scanned and logged into inventory for temporary storage. LRL will then transfer the airbags units to LRL's airbag processing and storage facility located at 300 Boggs Lane for processing and recycling of metals and components.

Narrative Waste Tracking

Lighting Resources, LLC will use Lionshot, a waste tracking software developed in-house specifically for Lighting Resources. Each order will be assigned a unique barcoded label, containing the customer name, generator, waste type, and date. Upon arrival at our LP Auer receiving facility each order will be scanned into inventory as being received. This documents the customer name, generator, waste type and quantity, as well as date and time received. Movement is tracked by scanning the unique bar code associated with each order. This is done anytime the material is

moved until processed and complete. This information is readily available for department's review in spreadsheet format. These spreadsheets will show the following information associated with each order.

- Customer and Generator names
- Date and time material received
- Quantities
- Movement/Transfer of waste
- Date and time processed

Best Regards,

Steve Barnett Vice President TN

Lighting Resources, LLC

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. The facility has a sprinkler system along with fire extinguishers, smoke and heat detectors.

(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 a permitted battery recyclers/smelters after sorting.

Airbags inflators and modules will only be received, scanned and logged in then transferred to LRL's airbag processing facility at 300 Boggs Lane. No Airbag inflators or modules will be processed at this facility. Only airbag materials that arrive at the facility accompanied by a signed certification statement, CERTIFICATION RE UNDEPLOYED AUTOMOBILE AIRBAGS statement sheet, stating that the materials are exempted from solid and hazardous waste regulation when they are legitimately reclaimed will be accepted at LRL, which includes only the following:

•unused automobile airbags modules and inflators that fail QA/QC programs and have never been installed in an automobile for sale, and

•used intact airbags modules that can safely undergo electronic deployment to recover a usable product. (i e.) Scrap metal, plastic, nylon

Note: No TAKATA or other manufacture's airbag modules or inflators that are subject to a recall due to an explosive shrapnel-producing defect, will knowingly be accepted for processing. (See Attached Customer/Generator Certification Form)

Other waste accepted at this facility is electronic waste, (E-waste) along with automotive off spec parts, Seatbelt pretensioners, 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. disassembling of some E-waste 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. Seatbelt pretensioners will be manually disassembled recovering scrap metal steel, aluminum, and strapping to be sold as commodities for further 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, Universal Waste, Hazmat, hazardous waste right to know, PPE, Fire safety, lockout tag out, OSHA training, etc. Training records are available for the Departments review.

(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 barcoded/numbered tracking BOL's for each customer, these are tracked by the date and time they are received and sent for processing utilizing a new barcode system. All E-waste and automotive parts are kept inside at all times and contained in appropriate containers (boxes, drums). All material is received on barcoded 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;

No scavenging of any waste material received at the facility will occur. Scavenging is strictly prohibited at LRL.

(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. LRL will only accept airbag materials that arrive at the facility accompanied by a signed certification statement, CERTIFICATION RE UNDEPLOYED AUTOMOBILE AIRBAGS statement sheet, stating that the materials are exempted from solid and hazardous waste regulation when they are legitimately reclaimed will be accepted for processing at LRL which includes only the following:

•unused automobile airbags modules and inflators that fail QA/QC programs and have never been installed in an automobile for sale, and •used intact airbags modules that can safely undergo electronic deployment to recover a usable product. (i e.) Scrap metal, plastic, nylon

Airbag modules/inflators will be logged/scanned in and transferred to LRL's airbags processing facility, <u>Note: No Recalled TAKATA or other manufacture's airbag modules or inflators that are subject to recall due to an explosive shrapnel-producing defect will knowingly be accepted for processing at this facility.</u>

Seatbelts pretensioners, 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.

(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.

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

Narrative of Waste Processing

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 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.
- Airbags: LRL will only accept (1) unused automobile airbags modules and inflators that fail QA/QC programs and have never been installed in an automobile for sale, and (2) Used intact airbags modules that can safely undergo electronic deployment to recover a usable product. (i e.) Scrap metal, plastic, nylon. No Takata airbag or other manufacture's modules or inflators that are subject to a recall due to an explosive, shrapnel-producing defect, will knowingly be accepted for processing. (See Attached Customer/Generator Certification Form.) Airbag inflators and modules will only be received, weighed, and logged into inventory and temporary stored at the LP Auer Rd facility prior to being transferred to the Boggs facility for processing. No processing of airbag inflators or modules shall occur at the LP Auer facility.
- 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.

CERTIFICATION RE UNDEPLOYED AUTOMOBILE AIRBAGS

BY MY DATED SIGNATURE BELOW, I HEREBY CERTIFY THAT:

Org. Name:

1.	The un-deployed automobile airbags described by the documents referenced below which are to be shipped to Lighting Resources in Johnson City, Tennessee, for reclamation — Are NOT TAKATA or other manufacturer's airbag modules of inflators that are subject to recall due to explosive, shrapnel-producing defect of cannot be safely deployed electronically.
	Customer / Generator Name:
	Shipment Tracking No. (BOL)
	Customer PO / Contract No:
2.	I am aware that: the U.S. Environmental Protection Agency (EPA) and the Tennessee Division of Solid Waste Management (DSWM) prohibit the reclamation of TAKATA Recalled airbag modules and inflators due to a manufacturing defect causing them to be hazardous wastes when disposed. the EPA and DSWM prohibit the reclamation of non-TAKATA used airbag inflators that will not be re-used due to the fact established by EPA that used inflators outside of the airbag module cannot be safely deployed. Used airbag inflators cannot be safely deployed or reused and must be managed as D003/ D001 hazardous waste.
3.	 I am aware that the EPA and the DSWM exempt from consideration as a solid of hazardous waste the following when legitimately reclaimed: unused automobile airbags modules and inflators that fail QA/QC programs and have never been installed in an automobile for sale, and Used intact airbags modules that can safely undergo electronic deployment to recover a usable product. (i e.) Scrap metal, plastic, nylon
4.	I am aware that Lighting Resources' facilities in Johnson City are not currently authorized to receive the automobile airbags described in <u>item 2 above</u> , but that they are fully authorized to receive and reclaim the automobile airbags described in <u>item 3 above</u> .
5.	I am aware that the organization I represent, and perhaps myself could be subject to substantial penalties under federal and state hazardous waste laws and regulations if we were to ship to Lighting Resources' Johnson City facilities the automobile airbags described in item 2 above . I am aware that if any item 2 above airbags are shipped to Lighting Resources the shipment will be refused and returned to me at my cost.
	Signature:
	Printed Name:
	Date:
	Title:

LRL LAMP /AIRBAG TRANSFER DOCUMENT

The below lamps/ Airbags on the listed BOL have been shipped to the LRL Destination Facility located at: 300 Boggs Lane Johnson City, TN 37604 for processing and recycling.

BOL#	Customer:		Gene	erator:		
				The property of	* 12. 1 × 1	Topy and a second
Date Shipped:		Date Received:		Time Re	ceived:	
Date processed:		Time Processed:			ing Supervis	nr:
and the phase completely a	in enit enit	Lamps Shipped		Tana ujaing tahua f		mps Processed
Type Lamps		Pallets/Drums/Boxes	Lbs.	Count	Lbs.	Count
4ft Tubes & Under						Count
5ft Tubes & Over						
U-Shape						
CFL		· · · · · · · · · · · · · · · · · · ·				
Drums of Crushed		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	<u> </u>			
HID lamps		***************************************				
Shielded Lamps						
Projector Lamps						
UV Lamps		***************************************				
Incandescent						
Other		////				
					Maria da	
Airbags		<u> 1900 - Andreadh III - Marighae Chaille a tha 1900 ann a 1900 ann an t-airtean an t-airtean ann an t-airtean a</u>	A-45 (- 1-88 8 6 1)			

Order Shipment Number:			_	
Completed Order Shipment:	NO	YES	Date:	

Year	2018	Monthly Waste In	Inventory Sheet					
Month	November							
				Amount Shipped	Amount			
	Inventory at Beginning	Amount	Amount	Offsite for	Offsite as	Inventory at End		
Lamp Type	of Month	Received	Processed	processing	Waste	of Month	Totals	Permit Limit
Straight Tubes, 4'	32,751	186,618	0	187,246	0	32,123		
Straight Tubes, 8'	286′5	24,125	0	20,412	0	9,695	41.818	56 994
U-shaped	222	1,712	0	546	0	1,388	1,388	5.080
HID	1096	4,474	0	4,486	0	1,084	1.084	5,555
CFL	364	1976	0	2268	0	72	77	5,100
Crushed Lamps	22077	14,311		16,157	0	4.131	ı	0440
Shatter Shields	3739	0	0	0	0	3,739		
Incandescent	382	238	0	238	0	382		
Ultra Violet	0	2336	0	0	0	2,336		
Projector Lamps	0	0	0	0	0	0		
Mix	318	8,758	0	4,780	0	4,296	14,884	24 131

96813

59,246

59,246

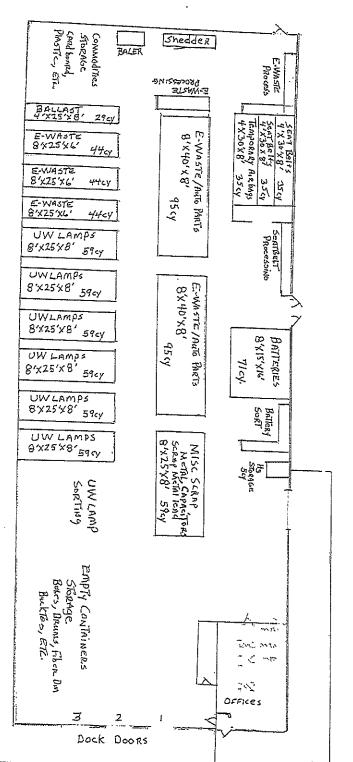
TOTAL

			Units	hc	he	he		hs	lhe	hc	he			lbs	, T
			Permit Limit Units						162660		02295			10000	T
			Totals						121082		54593			458	
			Inventory at End of Month	184	658	3460	0299	101419	8691	28711	25882	0	0	458	
		Amount Shipped	Offsite as Waste	0	0	0		0	0	0		0	0	0	
		Amount Shipped	Offsite for processing	0	0	0		0	0	0		0	0	0	
Naste Inventory Sheet			Amount Processed	0	0	0	0	2606	1276	0	0	0	0	0	
Monthly Waste			Amount Received	0	658	353	0	43,289	4722	0	0	0	0	0	
2018	November		Inventory at Beginning of Month	184	0	3107	0299	98289	5245	28711	25882	0	0	458	
Year	Month		E-Waste/Auto Type	Monitors (Flat Panel)	Televisions (Flat Panel)	CRT (TV/Monitor)	Consumer Electronics	Misc. Electronic Waste	Lighting Fixtures	Airbags/Seatbelts	Misc. Automotive Waste	Lead Markers	Lead Aprons	LED Lights	

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

Facility Inventory Storage Space Permitted Pounds = Cubic Yards Tracking

Material	Total Max Lbs. for Storage	Avg. Lbs. Per Cubic Yard	Permit Limit (cubic yards)
Universal Waste Lamps : (Fluor. Tubes, HID, CFL, U- Shape, Shielded, Misc.)	113,988 lbs.	322 lbs.	354
E-waste	162660 lbs.	505 lbs.	322
Batteries	65,675lbs.	925 lbs.	71
Seatbelts	45,500 lbs.	650 lbs.	70
Airbags (Temp. Storage)	28,385 lbs.	811 lbs.	35
Mercury Equip/ Elemental	1,165 lbs.	233 lbs.	5
Ballasts	27,405 lbs.	945 lbs.	29
Misc. Recyclable Material (Scrap metal , capacitors, lead aprons, etc.)	62.068 lbs.	1052 lbs.	59
	***************************************	Total	945 cubic yards



Lighting Resources LLC 128 LP Auer Rd
Floor Plan

