

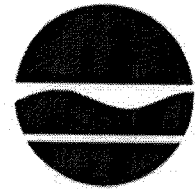
**New York State Department of Environmental Conservation
Division of Materials Management, Region 3**

21 South Putt Corners Road, New Paltz, New York 12561

Phone: (845) 256-3141 • FAX: (845) 255-3414

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Joe Martens
Commissioner

April 26, 2012

Robert L. Judkins, Jr., President
American Lamp Recycling LLC
PO Box 1550
Waterbury, CT 06721

Re: American Lamp Recycling
DEC Part 360 Registration criteria

Dear Mr. Judkins,

The Department has determined that the American Lamp Recycling facility process associated with mercury containing lamps, used electronics, small capacitor PCB ballasts, non-PCB ballasts, batteries and other mercury containing devices is not applicable under the 6NYCRR Part 360 (solid waste) regulations as the material is covered under the Part 373 (hazardous waste) regulations. Therefore, the Part 360 registration submitted for the 55 Riverview Drive, Marlboro, Ulster County facility is not necessary. Similarly, the Part 360 registration for the 26 Industrial Way, Wappingers Falls, Dutchess County facility may be withdrawn by American Lamp Recycling.

It is my understanding that the facility is exempt from hazardous waste permitting under the recycling exemption found at 373-1.1(d)(1)(viii) as long as storage requirements are met. Please contact Frank Kelly of the RCRA office in New Paltz at 845-256-3131 for further discussion on this aspect of your operation.

Sincerely,

Theresa L. Laibach
Environmental Program Specialist 2
Waste Reduction & Recycling

cc: Martin Brand, DMM Supervisor
Maryanne O'Connor, RCRA Supervisor
Frank Kelly, RCRA, Region 3
Brian Maglienti, DMM Albany



NOTICE OF INSPECTION RESULTS

Date : 06/08/2012

Owner : DAVID J GREEN
P O BOX 1550
WATERBURY, CT 06721

Facility : AMERICAN LAMP RECYCLING
26 INDUSTRIAL WAY
WAPPINGERS FALLS, NY 12590

Contact : ROBERT JUDKINS, JR
AMERICAN LAMP RECYCLING
26 INDUSTRIAL WAY
WAPPINGERS FALLS, NY 12590
(845) 896-0058

Compliance Status Determined On : 05/31/2012 1:30 PM

Compliance Status Determined By : JEFFREY C LAWYER
NYS DEC
21 SOUTH PUTT CORNERS ROAD
NEW PALTZ, NY 12561-1696

Basis for Determination : Routine Inspection

Comments :

The facility has an Air Registration for a machine which crushes fluorescent and high intensity discharge lamps and separates the materials into powder, glass, and metal. The emissions generated are controlled by HEPA and carbon filters, and vented to the outside. The machine is referred to as a USA Lights Model 2000. It is operated in an enclosed area under negative pressure, and was in operation at the time of the inspection.

Mercury is the pollutant of concern, and mercury compounds are a listed hazardous air pollutant in 6NYCRR Part 200 and the federal Clean Air Act. Potential and actual mercury emissions (with emission control) from the stack have been calculated to be less than one pound per year. Mercury levels are monitored inside the building on a daily basis to ensure levels are safe.

The differential pressure across the HEPA filters is monitored, and the filters are replaced when the pressure reaches a maximum setpoint. Filter replacement is typically every 6 months. Replacement of the carbon filters is based on processing time and occurs approximately every 5000 hours. This replacement is better than manufacturer (Calgon) recommendations. A meter in the processing room tracks hours of operation, and the hours are recorded daily.

Recordkeeping at the facility is well maintained. This includes when the HEPA and carbon filters are replaced. This information is kept on the computer and can be shown on the hazardous waste manifests. HEPA filters were last replaced on 1/18/2012, and the carbon filters were last replaced on 3/14/2012.

Part 200.7 requires that emission control devices must be kept in proper working condition. The monitoring and recordkeeping associated with the HEPA and carbon filters demonstrates compliance with this requirement.

The company plans to move to Marlboro. A registration application will be submitted to the Department for the new location.

Inspection Details :



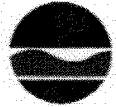
This Facility has been inspected for the following requirements, issued permits and active consent orders. Detailed descriptions of Emission Units, Emission Points, Processes and Emission Sources can be found in the listed permits.

Regulation Determinations (No Violations observed at the time of this Inspection):

Regulation : 6 NYCRR 200.7
FACILITY LEVEL

Regulation : 6 NYCRR 201-4.1 (a)
FACILITY LEVEL

New York State Department of Environmental Conservation



Registration ID: 3-5136-00133/00001

Facility DEC ID: 3-5136-00133

AIR FACILITY REGISTRATION CERTIFICATE
in accordance with 6 NYCRR Subpart 201-4

Registration Issued to: DAVID J GREEN
P O BOX 1550
WATERBURY, CT 06721

Contact: DAVID J GREEN
P O BOX 1550
WATERBURY, CT 06721

Facility: AMERICAN LAMP RECYCLING
55 RIVERVIEW DR
MARLBORO, NY 12542

Description:

Fluorescent and HID lamp dismantling and component separation unit with an enclosed machine. Emissions are reduced by HEPA and carbon filters. Phosphor powder, HEPA filters, and activated carbon are sent to mercury retorting facilities for final recovery of mercury.

Total Number of Emission Points: 1

Cap By Rule: No

Authorized Activity By Standard Industrial Classification Code:


- 4953 - REFUSE SYSTEMS
- 5093 - SCRAP AND WASTE MATERIALS

Registration Effective Date: 07/16/2012

Registration Expiration Date: (Not Applicable)

List of Regulations in Application:

- 6 NYCRR Part 201 Permits and Certificates
- 6 NYCRR Part 212 General Process Emission Sources



KENNETH R GRZYB
 REGION 3 AIR POLLUTION CONTROL ENGINEER
 NYSDEC REGION 3
 21 S PUTT CORNERS RD
 NEW PALTZ, NY 12561

This registrant is required to operate this facility in accordance with all air pollution control applicable Federal and State laws and regulations. Failure to comply with these laws and regulations is a violation of the ECL and the registrant is subject to fines and/or penalties as provided by the ECL. If ownership of this facility changes, the registrant is required to notify the Department at the address shown above using the appropriate forms and procedures within 30 days after the transfer takes place. The present registrant will continue to be responsible for all fees and penalties until the Department has been notified of any change in ownership.

New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials
Bureau of Hazardous Waste Regulation
Waste Determinations and Analysis Section, 9th Floor
625 Broadway, Albany, New York 12233-7251
Phone: (518) 402-8633 • FAX: (518) 402-9024
Website: www.dec.ny.gov



Alexander B. Grannis
Commissioner

March 17, 2008

Mr. Robert Judkins
American Lamp Recycling, LLC
26 Industrial Way
Wappingers Falls, NY12590

Dear Mr. Judkins:

This is to inform you that the New York State Department of Environmental Conservation received an acceptable "c7 Notification" from American Lamp Recycling, LLC on March 17, 2008 in accordance with the requirements of paragraph 371.1(c)(7). The "c7 notification" allows American Lamp Recycling, LLC use of the scrap metal exemption in 6 NYCRR 371.1(g)(1)(iii)(b).

Please feel free to contact the Waste Determinations and Analysis Section at (518) 402-8633 if you have any questions.

Sincerely,

Katie Hershey
Environmental Program Specialist, NYSDEC