February 26, 2018

RBG, Incorporated dba Resource-One and R-Two Holdings, LLC
c/o Rob Groeschen
6043 Interstate Circle
Cincinnati, OH 45318

Re: Resource One Covington Facility
Director's Final Findings and Orders (DFFO)
RCRA C - Hazardous Waste
Miami County
OHR000200097

Subject: Final Findings and Orders of the Director

Dear Sir:

Transmitted herewith are the Final Findings and Orders of the Director concerning the matter indicated for RBG, Inc. dba Resource-One.

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

Sincerely,

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

Enclosure

cc: Mitch Mathews, DERR-CO
    Todd Anderson, Legal
    Randy Kirkland, DERR-SWDO
BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

RBG, Inc. dba Resource-One
6043 Interstate Circle
Cincinnati, Ohio 45242

R-Two Holdings, LLC
362 East Loveland Avenue
Loveland, Ohio 45140

Respondents

Director's Final Findings and Orders

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By: [Signature] Date: 2/23/2018

PREAMBLE

It is hereby agreed by and among the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders (Orders) are issued to RBG, Inc. dba Resource-One (Resource-One) and R-Two Holdings, LLC (R-Two) (together known as Respondents) pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency (Ohio EPA) under Ohio Revised Code (ORC) §§ 3734.02(G), 3734.13, 3734.14 and 3745.01.

II. PARTIES BOUND

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

III. DEFINITIONS

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

IV. FINDINGS

The Director of Ohio EPA has determined the following findings:
1. Pursuant to ORC § 3734.02(G) and rule 3745-50-31 of the Ohio Administrative Code (OAC), the Director, by order, may exempt any person generating, storing, treating, disposing of, or transporting hazardous waste, in such quantities or under such circumstances that, in the determination of the Director, are unlikely to adversely affect the public health or safety or the environment from any requirement to obtain a permit or comply with other requirements of ORC Chapter 3734. Such an exemption shall be consistent with and equivalent to rules promulgated under the Resource Conservation and Recovery Act of 1976, 90 Stat. 2806, 42 U.S.C. § 6921 et seq., as amended.

2. ORC § 3734.02(E)(2) requires all persons engaged in the storage, treatment, or disposal of any hazardous waste to have a hazardous waste installation and operation permit issued in accordance with ORC § 3734.05, except at a facility that is not subject to permit requirements under rules adopted by the Director pursuant to ORC § 3734.02(E)(3)(b). Additionally, OAC rule 3745-55-76 requires all containers holding ignitable or reactive wastes to be at least 50 feet from the facility property line.

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

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

The Memorandum can be read to mean any used, discarded and un-deployed airbags are solid waste and hazardous waste (airbags that use
compressed gas would need to be properly evaluated in accordance with OAC rule 3745-52-11). Un-deployed airbags that were never installed in a vehicle, such as those sold at retail, are not "used" and, thus, not subject to the Memorandum.

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

4. Prior to the Memorandum, Respondent Resource-One stored discarded, un-deployed airbags prior to the airbags being recycled at 2000 Mote Drive, Covington, Ohio (Facility). Subsequently Respondent Resource-One recycled the air bags and transported recyclable material, such as scrap metal, off-site for further reclamation.

5. In light of the Memorandum, Respondent Resource-One and Ohio EPA have had discussions about Respondent Resource-One’s desire to continue to store and recycle discarded, un-deployed airbags at Respondents’ Facility without the need of a hazardous waste permit for storage prior to recycling as well as treatment of the airbags during the recycling process. During these discussions, Respondent Resource-One explained Respondent Resource-One would receive essentially two types of airbags devices, a lone inflator device and an assembled airbag module. The inflator device is regulated by Bureau of Alcohol, Tobacco and Firearms (BATF), which Respondent Resource-One has been issued an BATF permit (permit number 4-OH-109-34-OK-01141) for the storage and management of inflators. The storage of inflators will meet the following standards, pursuant to the BATF permit: in a fire-resistant, weather-resistant, and theft-resistant magazine, exposed metal components are painted to avoid sparking; use of non-sparking materials and tools; employee training and background checks. The assembled airbag modules are not regulated by BATF. At the effective date of these Orders, Respondents will store approximately 900,000 pounds of assembled airbag modules which will be stored in the warehouse and in some cases temporarily in secured trailers on-site. Six months after the effective date of these Orders, Respondents will only store up to 107,172 pounds of assembled airbags in the warehouse. With both types of units, Respondent Resource-One explained that the recycling process would entail shredding the devices indoors and underwater. Due to the underwater shredding activity, the ammonium nitrate is deactivated which renders the shredded units non-hazardous (the ignitability and reactivity hazardous waste characteristics are deactivated). Respondent Resource-One has trained all employees who handle inflators and airbag modules and will continue to update and provide training on the safe handling of these devices. Furthermore, Respondent Resource-One intends
to audit the Facility to abate any potential uncontrolled sources of static or energy that could potentially lead to deployment of airbags and to ensure proper personal protective equipment and handling procedures are used. Respondent Resource-One explained that by following these procedures all airbag inflator/assembly modules can be effectively and safely recycled.

6. Ohio EPA’s current interpretation of the un-deployed airbags (lone inflators and modules) is that they are “commercial chemical products” because they have not been used for their normal intended purpose as airbags (they have not been deployed). OAC rule 3745-51-02(C)(3) provides that commercial chemical products being reclaimed are not wastes (per the table in rule) and since they are not wastes, undeployed airbags cannot be hazardous waste subject to regulation. Ohio EPA views the description of the recycling process in Finding No. 5. of these Orders to be a legitimate form of reclamation.

7. Ohio EPA has been in discussions with U.S. EPA about the Memorandum and Ohio EPA’s view that the airbags at issue do not have a meaningful difference from un-deployed airbags that are not “used”. Respondent Resource-One has also reached out to U.S. EPA for it to reconsider its Memorandum and interpretation. Ohio EPA and Respondents continue to work together to find a solution that would not necessitate the need for Respondents to obtain a hazardous waste permit for storage at the Facility. This also keeps with the Memorandum’s discussion that entities work with their States to make determinations on exemptions and exclusions.

8. On February 19, 2018, Respondents submitted an application (2018 Application) to Ohio EPA pursuant to ORC § 3734.02(G) and OAC rule 3745-50-31 for an exemption from ORC § 3734.02(E)(2) as well as OAC rule 3745-55-76. The 2018 Application is attached and incorporated herein. The 2018 Application included information justifying the request and documentation that the storage of airbags at the Facility without a hazardous waste installation and operation permit and complying with the 50 foot setback requirement in OAC rule 3745-55-76 is unlikely to adversely affect public health or safety or the environment.

9. Pursuant to ORC § 3734.02(G) and OAC rule 3745-50-31, the Director has determined that Respondents’ management of airbags at the Facility described in the 2018 Application from the effective date of these Orders is unlikely to adversely affect public health and safety or the environment so long as it is managed in accordance with these Orders, the 2018 Application, and the ATF permit. Furthermore, issuance of these Orders is consistent with the conditions set forth in ORC § 3734.14 which encourages the recovery of resources from hazardous waste.
V. ORDERS

1. Respondents are hereby exempted from the requirement to obtain a hazardous waste installation and operation permit issued in accordance with ORC § 3734.05, as required by ORC § 3734.02(E)(2) and the 50 foot setback requirement in OAC rule 3745-55-76, provided Respondents comply with the 2018 Application and the conditions herein and Respondents’ BATF permit which is incorporated into these Orders as if fully written herein. The exemption applies to all discarded, un-deployed airbags at the Facility stored prior to the shredding (recycling/and or treatment) of the airbags.

2. Respondents may not exceed the following storage capacity at the Facility, except for assembled airbag modules as described in Order No. 3.:
   a. Maximum of 107,172 pounds of assembled airbag modules in the warehouse; and
   b. Maximum of 169,000 pounds of inflators (BATF regulated) in BATF magazines.

3. As described in Finding No. 5. of these Orders, Respondents may store up to 900,000 pounds of assembled airbag modules at the Facility for six months (180 days) after the effective date of these Orders to facilitate the initial processing of received assembled airbag modules. After the six month period, Respondents shall comply with the storage limitations set forth in Order No. 2. During this six month period, Respondents shall submit a progress report on the 15th of each calendar month which describes the amount of airbag modules processed for the previous month and the current inventory of assembled airbag modules. These reports shall be submitted pursuant to Section X. Notice, of these Orders.

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

5. Respondent Resource-One shall maintain a record of amount of recycled material post the shredding operation as well as information on the destination facilities for the recycled materials.

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

7. Respondent RBG, Inc. dba Resource-One shall properly characterize any waste generated from the shredding process in accordance with OAC rule 3745-52-11 and subsequently manage the waste in accordance with all applicable laws and rules.

8. The Director may revoke the exemption granted in Order No. 1 for any reason including, but not limited to, a determination that Respondent's activities at the Facility adversely affect public health or safety or the environment and/or the activities are not being conducted in accordance with these Orders and/or the 2018 Application.

9. The exemption provided by Order No. 1 shall terminate when any of the following occurs:
   a. U.S. EPA revokes the Memorandum;
   b. Respondent no longer holds a valid BATF permit; or
   c. The Director revokes the exemption granted under these Orders.

10. If either Order 9.b. and/or 9.c. occurs, Respondent shall within 14 days of the occurrence, cause the lawful off-site transportation of all un-deployed airbags to an authorized facility.

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

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

VI. TERMINATION

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

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

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

VII. OTHER CLAIMS

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

VIII. OTHER APPLICABLE LAWS

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

IX. RESERVATION OF RIGHTS

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

X. NOTICE

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

Ohio Environmental Protection Agency
Southwest District Office
Division of Environmental Response and Revitalization
401 East Fifth Street
Dayton, Ohio 45402
Attn: Hazardous Waste Program Manager

and Ohio EPA Central Office at the following address:

Manager, Hazardous Waste Compliance Assurance Section
Ohio Environmental Protection Agency
Lazarus Government Center
XI. MODIFICATIONS

These Orders, including the application, may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be processed by the administrative requirements found in OAC rule 3745-50-51. The effective date of the modifications shall be the date approved by Ohio EPA.

XII. WAIVER

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

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

XIII. EFFECTIVE DATE

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

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

IT IS ORDERED AND AGREED:

Ohio Environmental Protection Agency

[Signature]
Craig W. Butler
Director
IT IS SO AGREED:

RBG, inc. dba Resource-One

Signature

Printed or Typed Name

Title

Date


R-Two Holdings, LLC

Signature

Printed or Typed Name

Title

Date
Hi Mitch:

Rob Groeschen asked me to respond to your need for clarification about our exemption order request. Our intention was to request the exemption order in the name of Resource One and R Two Holdings LLC; both companies are identified under the signature line but we failed to include R Two Holdings, LLC on line one of the request letter. (an oversight) Hopefully this clarification will suffice; however, if we need to revise the letter or provide additional information please let me know and we will handle immediately.

Thanks for your continued help; it is sincerely appreciated.

Kathy O’Brien, CFO
Resource One
513-910-5911
February 19, 2018

Dear Mr. Butler,

Resource One is requesting that the Ohio Environmental Protection Agency (Ohio EPA) grant an exemption from hazardous waste permitting (OAC 3745-50) for the storage and treatment of automotive air bags at our facility located at:

2000 Mote Drive
Covington, Ohio 45318

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

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

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

The current position of US EPA is that automotive air bags that have never been installed in a vehicle would be considered a "Commercial Chemical Product" and if recycled, would not be a hazardous waste. US EPA is currently evaluating their position on this and will be issuing guidance in the future.

Automotive air bags that have been installed in a vehicle and then removed, would be a "spent material" and therefore a hazardous waste due to the characteristic of ignitability and reactivity (D001 & D003). This interpretation stems from the US EPA's June 23, 2017 Memorandum (Recalled Takata Airbag Inflators) issued by Barnes Johnson, Director of the Office of Resource Conservation and Recovery.
For the purpose of this exemption request, Resource One will be managing all automotive air bags as Hazardous Waste once they arrive at the facility in Covington, Ohio. When US EPA issues their guidance on automotive air bags that have never been installed in a vehicle, and if this guidance maintains that automotive air bags that have never installed in a vehicle are not Hazardous Waste if recycled. Then Ohio EPA and Resource One will address changes to this exemption to exclude automotive air bags that were never installed in a vehicle.

Part of the process at Resource One is regulated by the Federal Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF). However, ATF only regulates the inflators that are not assembled within a complete air bag assembly (module). ATF does not regulate whole air bag assemblies (modules). So, Resource One will not be removing inflators from whole air bag assemblies (modules). The reason for not removing the inflators from the air bag assembly (module) is to limit employee exposure and improve efficiency.

For questions about the operations or information contained in this application, please contact Todd Hormann (COO) at 937-539-0945, or email at: thormann@r1recycling.com.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

Robert Groeschen
Owner of RBG, Inc. and R-Two Holdings, LLC
Compliance with Storage and Treatment requirements:

Scope:

The content below describes the relevant TSDF rules that will apply to the operations at Resource One and shall be included in the Director’s Findings and Orders that describe the exemption from the requirement to obtain a permit for storage and treatment of automotive air bags (Hazardous Waste).

Content and Activities (OAC 3745-50-43 & 3745-50-44):

Resource One will be shredding these automotive air bags at the Covington, Ohio facility and then sending the shredded material off-site to a metal recycling facility.

Enclosed in this request you will find the following additional information:

- Appendix A: Summary of how Resource One will comply with our Federal ATF permit and associated requirements;
- Appendix B: Management of air bags in a safe and effective manner to prevent any adverse effects to human health and the environment.
- Appendix C: Copy of Resource One’s liability insurance.
- Appendix D: Resource One Site Drawings.
- Appendix E: Transportation Classification Report (UN Testing).
- Appendix H: Resource One Facility Closure Plan.
- Appendix I: Post Closure Cost Estimate.
- Appendix K: Village of Covington Ohio — Fire Chief approval of deviation from >50 ft rule.
- Appendix L: Daily operation inspection log.
- Appendix M: Resource One ATF permit.

Resource One will install shredding systems at the Covington, Ohio. Each system will generate up to 700 gallons of process water per day. See Waste Analysis plan for details on how this wastewater will be evaluated.

Waste Analysis Plan (OAC 3745-54-13) – See Appendix F
Basic Process Flow:

Shipment of automotive air bags (units) arrive from customer

Resource One employee checks the manifest and verifies quantity and content.

Resource One employee weighs each pallet and records.

Resource One employee stages or takes the pallet to the conveyor shredder.

Resource One employee depacks the units.

Resource One employee loads the units on the shredder conveyor.

Shredded units are conveyed to a 30-yard roll-off.

30-yard roll-off is transported to the metal reclaimer.

Owner/Operator name(s):

RBG, Inc. dba Resource-One
6043 Interstate Circle
Cincinnati, Ohio 45242

R-Two Holdings, LLC
362 East Loveland Avenue
Loveland, Ohio 45140

Resource-One is a privately-owned company.

Address of the Resource One site that will process the Automotive Air Bags:

2000 Mote Drive
Covington, Ohio 45318

Latitude: 40° 06' 31.73" N
Longitude: 84° 20' 49.90" W

Telephone Number: 513-247-0175

Owner of RBG, Inc. and R-Two Holdings, LLC: Robert Groeschen

Resource One Responsible Officials:

COO: Todd Hormann
CFO: Kathy O'Brien

EPA Identification Number: Resource One EPA Identification number: OHR000200097

NAICS Code: 56211 – Waste Collection

Site drawings: See Appendix D
Facility map
Topography map
List of Current Permits:

3. Ohio EPA Stormwater “No Exposure” certification: 1GRN00761*AG
4. EPA Identification No: OHR000200097
5. State of Ohio – Division of State Fire Marshal permit. 86.55.0006

Hazardous Wastes to be processed for recycling:


Based on the US EPA memorandum, this would include Automotive Air Bags that were installed in vehicles and then removed. US EPA considers these units to be “used” (i.e., spent materials). These “used” Automotive Air Bags would then exhibit the following characteristics of Hazardous Waste:

D001 – Ignitable
D003 – Reactive

For the purpose of this exemption request, Resource One will be managing all automotive air bags as Hazardous Waste once they arrive at the facility in Covington, Ohio. When US EPA issues guidance on automotive air bags that have never been installed in a vehicle, and if this guidance maintains that automotive air bags that were never installed in a vehicle are not Hazardous Waste if recycled. Then Ohio EPA and Resource One will address changes to this exemption to exclude automotive air bags that were never installed in a vehicle.

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

As stated above, these automotive air bags will be processed in a shredder that includes an underwater chamber. The shredder units have a very tight or narrow gap between the tines on the shredder blades. This will ensure that each unit is sufficiently rendered inert by deployment in the shredding unit.

The deployment and removal of the hazard was confirmed by UN testing performed on 10/27 – 11/06/2017, with a final report on 11/7/2017. In addition, any ammonium nitrate that is not deactivated in the shredding process would be rendered inert in the water that is part of the shredding process.

See Appendix E: Transportation Classification Report
The main purpose of this process at Resource One is to remove the hazard from the Automotive Air Bags and then recycle the shredded material.

Normal Processing quantities:

- Daily average: 13,000 automotive air bags per day
- Daily maximum: 15,600 automotive air bags per day

Storage quantities:

- Maximum on-site storage of Automotive Air Bags (whole units) — six (6) trailers (107,172 pounds).
- Maximum on-site storage of Inflators (ATF regulated) — five (5) trailers (magazines) (169,000 pounds).

Exception request:

Resource One has approximately fifty (50) trailers of fully assembled automotive air bags (modules) on-site that are waiting to be processed once Ohio EPA issues an exemption. Resource One is committed to getting down to 6 trailers within 6-months of the issuance date of Ohio EPA’s Exemption. During this 6-month period, Resource One may exceed the normal processing quantities.

To demonstrate to Ohio EPA that Resource One is progressing on this commitment to reduce the on-site trailers down to 6, Resource One will submit a monthly progress report to Ohio EPA showing the following:

- Reporting month;
- Amount processed for the previous month;
- Current inventory of trailers containing fully assembled (modules) automotive air bags.

Resource One will submit this report by the 15th of each month for preceding month. Once Resource One achieves the reduction down to six (6) trailers, this reporting obligation will end.

*One trailer equals approximately 18,000 pounds.*

Waste Analysis Plan (OAC 3745-54-13) – See Appendix F

UN Testing report.
Wastewater analysis plan.
Rejection plan.
Annual review.
Security (OAC 3745-54-14):

Resource One has a security system that includes video cameras and motion sensors. Cameras are located at every exterior door (overhead & people doors).

The facility is locked, and the alarm is set each day when the last supervisor or manager leaves.

Only the supervisors and manager of the facility have the access code for the alarm system. The company that monitors the security system has a Resource One call list. If the security company does not reach a Resource One employee, the police are called immediately.

Access control:

During daytime business hours, all people doors will be locked except the lobby door from the outside. The lobby door on the inside will be locked. All visitors will hit the buzzer/ringer located inside the lobby to request access. All visitors must sign-in on the visitor register in the front lobby.

During 2nd and 3rd shift hours, all doors will be locked in the same manner as daytime business hours. In addition, the security system will be engaged within “stay mode” while all employees are working. The Team Leader, Supervisor or Manager will only disengage the security system during breaks, lunch, and when employees are arriving and leaving.

Non-processing times (weekend and holidays). All doors will be locked, and the security system will be fully engaged in the “away mode.”

Truck traffic:

All trucks entering the site will be logged or the driver will sign-in on a log sheet. Any trucks that are loaded or unloaded will be checked-in by a Resource One employee. Truck drivers shall check-in at the Shipping & Receiving people door at the side of the facility. This door will be locked, however, Resource One will have a buzzer/ringer at the door to alert Resource One employees.

Visitors and Contractors:

All visitors and contractors to Resource One will be accompanied by a Resource One employee at all-times. The only exception to this is for contractors that have been pre-approved by Resource One and have been through safety training. On-going contractors who have been pre-approved and have been trained on the safety requirements, will be issued a “Contractor’s Badge.”

Employees:

All Resource One employees go through pre-employment screening. If the employee will be working in the automotive air bag processing, additional ATF approval is required. All Resource One employees have an Employee Identification card.
**Inspections (OAC 3745-54-15):**

*Daily Operation Check:*

Resource One staff will conduct and document a daily operation inspection to ensure the shredding equipment is operating properly, all safety measures are in place and working properly, and there is no risk of environmental contamination. The inspection will include the following:

- Safety issues. Proper grounding of equipment, shredders and ancillary equipment guards are on in place and structurally sound.
- PPE and spill response equipment available and in place.
- Emergency response communication methods available and in good working order.
- Automotive air bag storage. Ensure there are no unusual circumstances such as severely damaged packaging or other indicators representing a potential safety or environmental issue.
- Fire extinguishers – checked visually daily. Monthly inspections will be documented per OSHA requirements.
- Ensure that no open flames or sparking equipment is within 25 feet of any automotive air bag storage.
- Ensure that the security system including cameras are working properly.
- Wastewater containment. Checking for leaks in equipment or containers.
- Condition of scrap containers including checking for leaks.
- Outside conditions for any exposure or unusual conditions.
- Maintain isle space to allow the free movement of emergency response equipment around the outside of the automotive air bag storage areas. This does not apply to the ATF storage magazine(trailers). The magazine will comply with applicable ATF requirements.

This daily operational inspection will be documented on a daily inspection form.

Wastewater containers will be check during the startup phase of this operation to check for the following:

- Wastewater for significant Odor, Discoloration, Oils and grease, Cloudiness, or Coolness or heat generated (endo or exothermic). Check the integrity of the wastewater containers.

After the start-up phase, Resource One will evaluate the wastewater to determine if it can be discharged to The Village of Covington, Ohio. If so, Resource One will work with The Village of Covington, Ohio staff and Ohio EPA to obtain applicable discharge permits and PTIs for any treatment holding tanks that may be necessary. If Resource One can discharge to The Village of Covington, Ohio, the inspections of the wastewater containers would end. At that time, Resource One would comply with any applicable Village of Covington sewer use by-laws or Ohio EPA indirect discharge requirements.

Resource One will begin evaluating the wastewater upon the first full week of processing of the automotive air bags. This will include sampling of the wastewater for contaminates.
Monthly Maintenance Check:

At a minimum each month, Resource One will conduct an inspection of the overall maintenance and operation of the shredding process. This inspection will include:

- Overall integrity of the shredding equipment including the grinding portion of the units.
- Electrical supply lines to ensure their integrity.
- Machine guarding.
- Integrity of the water holding chamber.

Resource One will also implement a documented preventive maintenance plan and schedule for the shredders and ancillary equipment. This will be identified on a planned PM schedule by Resource One maintenance staff.

Quarterly Compliance and Management System Audits:

Resource One maintains an annual compliance calendar for all environmental and ATF regulatory requirements and best management practices. This calendar details all tasks necessary to maintain compliance and continuous improvement. The calendar defines each task, the responsible employee(s), and due dates for each task. Resource One’s management team monitors these tasks and due dates each month. In addition, Resource One has a third-party professional auditor conduct an audit each quarter of compliance and the environmental management system including the tasks in the compliance calendar.

Visual checks:

After the automotive air bags have been checked-in at Resource One, operators will visually check each pallet prior to loading onto the conveyor that leads to the shredding equipment.

Prior to transporting any shredded automotive air bags off-site, Resource One staff will visually check the shredded metal container for any leaks or integrity issues.

Ignitable/Reactive Waste Management (OAC 3745-54-17):

Resource One established the automotive air bag shredding process in a manner to prevent any adverse effects from ignitable/reactive waste or to prevent accidental ignition or reaction. The shredding process with the water chamber was chosen specifically to manage the automotive airbags due to their potential for being ignitable or reactive.

All shredding equipment will be properly grounded. All electrical supply to the shredding equipment will be hermetically sealed. No other high voltage electricity or ignition sources (open flames or sparking equipment) will be located or used within twenty (25) feet from the area where the air bags are processed.

Resource One has a fire suppression sprinkler system throughout the facility.
There is a designated smoking area in the front parking lot. This area is >250 feet from any storage or processing of automotive air bags. Smoking is not permitted in any other area at Resource One. Resource One will have "No Smoking" signs posted throughout the facility.

All Resource One employees involved in the processing of the automotive air bags will be trained on all handling, safety, and emergency response procedures including the Hazardous Waste Contingency Plan.

Exception request:

All normal storage of automotive air bags will be >50 feet from the property line. However, when the automotive air bags are processed, the pallet that is used to unload from onto the shredder conveyor will be <50 feet from the property line.

Resource One is requesting that Ohio EPA exempt this area from the requirement in OAC 3745-55-76 to be >50 feet from the property line. Resource One is confident that this area does not present any risk to human health or the environmental for the following reasons:

- Automotive air bags are not a traditional ignitable or reactive waste (automotive part).
- The automotive air bags do not include storage of any free liquids in a traditional manner such as a drum or tote.
- The automotive air bags are parts in a solid form.
- The area where the automotive air bags are loaded onto a conveyor is within a building.
- The area where the automotive air bags are loaded is operated in a safe manner according to Resource One’s procedure. Resource One’s procedure includes health and safety actions to address any potential hazards in the area including the use of proper personal protective equipment. This is based on a Job Hazard Analysis that was completed by Resource One.
- The design of the operation is an effective manner to recycle the automotive air bags (use of water chamber in the shredder).
- Electrical supply to the shredding equipment will be hermetically sealed.
- Fire suppression system.

Resource One obtained signed approval on 02/08/2018 from the Village of Covington, Ohio Fire Chief to deviate from the >50 ft requirement. Mr. Bart M. Weer. See Appendix K.
The nearest major environmental receptor is the Stillwater River. It is 0.5 miles from the facility.

**Personnel Training (OAC 3745-54-16):**

All Resource One employees involved in the air bag processing will be trained on the following prior to performing any function associated with the automotive air bags:

- Safety procedure associated with the air bag processing.
- Inspection requirements.
- Hazardous Waste Contingency Plan which includes emergency response methods.
- Applicable requirements in this application including pollution prevention.

The Hazardous Waste Contingency Plan training will include the following:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.
- Key parameters for automatic waste feed cutoff systems.
- Communication and alarm systems.
- Response to fire and explosions.
- Response to Groundwater contamination incidents.
- Shutdown of operations.
All Team Leaders/Forklift drivers, Supervisors and Managers will receive detailed Hazardous Waste compliance training (according to the requirements in OAC 3745-54-16).

<table>
<thead>
<tr>
<th>Job Title</th>
<th>Completed before beginning job function and annually (meets the requirements of OAC 3745-54-16)</th>
<th>*Completed initially and annually for HAZ WASTE and every 3 years for DOT HAZMAT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safety Procedure</td>
<td>Inspection Requirements</td>
<td>Hazardous Waste Compliance</td>
</tr>
<tr>
<td>Inspeccion Plan/ ER</td>
<td>Applicable Requirements in this application</td>
<td>DOT HAZMAT Training</td>
</tr>
</tbody>
</table>

*HAZ Waste training must be completed within 6-months initially and DOT HAZMAT within 90-days initially.

Resource One employees will receive annual refresher training on all the items listed above. If a change occurs that impacts training needs, training will be conducted upon the initiation of the change. Resource One has a Management of Change Procedure in place to address changes including the initiation of training.

Emergency Coordinators, supervisors and Team Leaders/Forklift Drivers will receive emergency response HAZWOPER awareness level training as part of their initial DOT Hazardous Material training and refresher training every three years after their initial Hazardous Material training.

In addition, Resource One has an Environmental Management System that identifies specific training requirements based on each job position. These training requirements are identified on a Training Matrix and initiated when an employee is hired or begins a new position. Resource One also requires annual refresher training on applicable procedures. Each manager at Resource One approves the employee’s training list and verifies his or her competency.

Reference: Resource One Environmental Training & Competency Procedure

Resource One will maintain records of all training required by this section. Record will include job title, description of training and a record that the training was completed.
Location of the facility (OAC 3745-50-44):

2000 Mote Drive
Covington, Ohio 45318

Latitude: 40° 06' 31.73" N
Longitude: 84° 20' 49.90" W

The site elevation is 932 feet above sea level.

The site is located approximately 0.5 miles from the Stillwater River.

Based on the elevation of the facility grounds and the FEMA Flood Map Service Center maps for The Village of Covington, Ohio area, the Resource One location is not within a 100-year flood plain.

See FEMA map below for The Village of Covington, Ohio below. 2000 Mote Drive is in an area designated as “Area of Minimal Flood Hazard.”

FEMA – Covington, Ohio Flood Map:
Hazardous Waste Preparedness, Prevention and Contingency Plan (OAC 3745-54-51):

Resource One has developed and implemented a contingency plan for the facility. The contingency plan is intended to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

Based on the design of the equipment and the nature of the automotive air bags (solid parts), a release is unlikely. In addition, Resource One has carefully chosen a shredder design to minimize the risk of an incident involving an explosion or fire.

Resource One Hazardous Waste Contingency Plan — See Appendix G

3745-55-73 Management of containers.

The automotive air bags will arrive at Resource One on a semi-truck trailer in boxes on pallets, in containers, or in DOT performance-oriented packaging/containers. A Resource One employee data-records the units upon arrival. The automotive air bags are then staged and sent on for processing. The processing involves placing the units on a conveyor that feeds one of the on-site shredders. After shredding, the shredded material is pulled out by a conveyor and fed to a 30-yard roll-off container. When the 30-yard roll-off container is full, it is transported to the scrap metal recycling facility. The 30-yard roll-off is a sealed container.

Individual inflators that are regulated by ATF will follow the ATF permit requirements. If stored on-site, they are staged in an ATF approved magazine that follows the requirements of the ATF permit identified in Appendix M.

The automotive air bags are not a traditional Hazardous Waste. There are no concerns with leakage or spillage. The units are coming in as a solid automotive part either in the form of a whole completed air bag assembly (module), or as an individual inflator (ATF regulated).

All automotive air bags coming in to Resource One are checked-in and recorded for customer purposes prior to processing. Once they are processed and the hazard is negated, the 30-yard roll-off will be managed as a recycled metal and sent to a metal reclamer. The 30-yard roll-off will be inspected as part of the process inspections.

Resource One will maintain ample isle space around the outside perimeter of the automotive air bag (fully assembled modules) storage areas. This will allow free movement of emergency response equipment in the case of an emergency. Isle space in between each individual container with an automotive air bag is not feasible. If a fire or explosion were to occur at the facility, personnel would be evacuated.

Isle space within the ATF magazine (trailer) is not applicable. Resource One will comply with the ATF requirements for storage magazines including locking of the magazine (trailer).
Recordkeeping (OAC 3745-54-70 through 3745-54-77)

OAC-3745-54-71 Use of the manifest system:

Manifests will be managed through Resource One’s Records Management Procedure. This includes the following:

- When Resource One receives a manifested shipment of automotive air bags, Resource One personnel will sign and date each copy of the manifest and note any discrepancies.
- Provide the transporter a copy of the manifest.
- Within 30-days submit a copy of the manifest to the generator.
- Retain a copy in Resource One’s files for at least 3 years.

OAC-3745-54-76 Unmanifested waste report or rejection of a shipment:

If Resource One receives a shipment of automotive air bags that should be manifested (used air bags/inflators) as a hazardous waste without an accompanying hazardous waste manifest, a report in accordance with this rule will be submitted to Ohio EPA within 15-days after receiving the automotive air bags.

If Resource One receives a shipment of automotive air bags and the shipment has other hazardous waste on-board that is not automotive air bags, Resource One will reject the shipment and notify Ohio EPA immediately.

The on-site supervisor will be responsible for the management of the manifests. The back-up will be the manager.

Inspection records:

- The daily operational inspections will be documented and kept for a period of at least 3-years.
- All Hazardous Waste Manifests will be kept for a period of at least 3-years (or until the E-Manifest system is fully functional).
- All monthly maintenance inspections and preventative maintenance will be documented and kept for a period of at least 3-years.
- All quarterly compliance and environmental management system audits will be kept for a period of at least 3-years.

Records of the initial wastewater evaluation will be kept for a period of at least 3-years.

If Resource One begins discharging the wastewater to The Village of Covington, Ohio, records will be maintained according to any indirect discharge permit or regulatory requirements.

Training Records:

Training records will be maintained for all employees involved in the automotive air bag processing for at least 3-years. The record will include:
• Job description/title.
• Training required.
• Outline of the training.
• Evidence of training completion.

OAC -54-73 Operating record.

Resource One will keep the following records as part of its operating record:

<table>
<thead>
<tr>
<th>Record</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Daily and monthly inspection and maintenance records.</td>
<td>3-years</td>
</tr>
<tr>
<td>The amount of total automotive air bags received at the site each day in pounds.</td>
<td>3-years</td>
</tr>
<tr>
<td>The amount of automotive air bags processed each day.</td>
<td>3-years</td>
</tr>
<tr>
<td>A breakdown of the amount of automotive air bags received from each generator by date, the transporter used and the waste codes.</td>
<td>Life of the facility</td>
</tr>
<tr>
<td>Waste analyses performed (UN testing and wastewater testing).</td>
<td>3-years</td>
</tr>
<tr>
<td>Summary of any emergency incidents that require implementation of the contingency plan.</td>
<td>3-years</td>
</tr>
<tr>
<td>Any corrective actions implemented as a result of implementation of the contingency plan.</td>
<td>3-years</td>
</tr>
<tr>
<td>Closure plan including cost estimates and updates.</td>
<td>Life of the facility</td>
</tr>
<tr>
<td>Hazardous Waste Manifests received.</td>
<td>3-years</td>
</tr>
<tr>
<td>Employee training records.</td>
<td>3-years</td>
</tr>
<tr>
<td>Monthly report to Ohio EPA indicating trailer inventory (only required for the first 6 months of operation). See “Exception Request” starting on Page 5.</td>
<td>3-years</td>
</tr>
</tbody>
</table>

OAC 3745-54-75 Biennial report

Resource One will submit a biennial report by March 1st of every even numbered. The report will cover Resource One’s activities for the automotive air bags during the previous calendar year. The information in the report will be as required by this rule.

OAC 3745-54-77 Additional reports

Resource One will report any of the following to Ohio EPA within 3 business days:
• Releases, fires, or explosions involving the processing of automotive airbags; and
• Closure of the facility.
Facility Closure (OAC 3745-55-42 through 3745-55-44)

See Appendix H

3745-55-44 Cost estimate for post-closure care.
3745-55-45 Financial assurance for post-closure care.
3745-55-46 Use of a mechanism for financial assurance of both closure and post-closure care.

See Appendix I. Cost Estimate for Post-Closure Care.

Within 30-days after the effective date of the Director's Findings and Orders (exemption), Resource One will secure and establish financial assurance to cover the costs identified in Appendix I - Cost Estimate for Post-Closure Care.

Resource One will provide evidence to Ohio EPA showing financial assurance has been secured within 30-days after the effective date of the Director's Findings and Orders (exemption).

Liability Requirements (OAC 3745-55-47)

See Appendix C – Resource One, Certificate of Liability Insurance.
In accordance with the provisions of Title XI, Organized Crime Control Act of 1970, and the regulations issued thereunder (27 CFR Part 555), you may engage in the activity specified in this license or permit within the limitations of Chapter 40, Title 18, United States Code and the regulations issued thereunder, until the expiration date shown.

**THIS LICENSE IS NOT TRANSFERABLE UNDER 27 CFR 555.53.** See "WARNINGS" and "NOTICES" on reverse.

<table>
<thead>
<tr>
<th>Name</th>
<th>RESOURCE ONE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct ATF</td>
<td>ATF - Chief, FELC</td>
</tr>
<tr>
<td>Correspondence To</td>
<td>244 Needy Road, Martinsburg, WV 25405-9431</td>
</tr>
<tr>
<td>Chief, Federal Explosives Licensing Center (FELC)</td>
<td>Christopher R. Keen</td>
</tr>
<tr>
<td>Mailing Address</td>
<td>RBG INC RESOURCE ONE 6043 INTERSTATE CIRCLE CINCINNATI, OH 45242-</td>
</tr>
</tbody>
</table>

**Promises Address (Changes? Notify the FELC at least 10 days before the move.)**

2000 MOTE DRIVE COVINGTON, OH 45318-

**Type of License or Permit**

34-USER OF EXPLOSIVES

**Purchasing Certification Statement**

The licensee or permittee named above shall use a copy of this license or permit to assist a transfer of explosives to verify the identity of the transferee and the licensed status of the license or permit as provided by 27 CFR Part 555. The signature on each copy must be an original signature. A facsimile, scanned or e-mailed copy of the license or permit with a signature intended to be an original signature is acceptable. The signature must be that of the Federal Explosives Licensee (FEL) or a responsible person of the FEL. I certify that this is a true copy of a license or permit issued to the licensee or permittee named above to engage in the business or operations specified above under "Type of License or Permit."

Licensee or Permittee Responsible Person Signature: Todd Horvath

Position/Title: CEO

Printed Name: Date: 09/29/17

Right of Succession (27 CFR 555.59). (a) Certain persons other than the licensee or permittee may secure the right to carry on the same explosive materials business or operations at the same address shown on, and for the remainder of the term of, a current license or permit. Such persons are: (1) The surviving spouse or child, or executor, administrator, or other legal representative of a deceased licensee or permittee; and (2) A receiver or trustee in bankruptcy, or an assignee for benefit of creditors. (b) In order to secure the right provided by this section, the person or persons continuing the business or operations shall furnish the license or permit for that business or operations for endorsement of such succession to the Chief, FELC, within 30 days from the date on which the successor begins to carry on the business or operations.

(Continued on reverse side)
1. As provided in Title XI of the Organized Crime Control Act of 1970 (U.S.C. § 842(i)), it is unlawful for any person who (1) is under indictment for, or has been convicted of, a crime punishable by imprisonment for a term exceeding 1 year, (2) is a fugitive from justice, (3) is an unlawful user of, or addicted to any controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802)), (4) has been adjudicated as a mental defective or has been committed to a mental institution, to ship, transport, or receive any explosive materials in interstate or foreign commerce, (5) is an alien, other than an alien who is lawfully admitted for permanent residence (as that term is defined in section 101(a)(15) of the Immigration and Nationality Act), or meets any other exception under section 842(a)(5), (6) has been discharged from the armed forces under dishonorable conditions, or (7) having been a citizen of the United States, has renounced the citizenship of that person.

2. Federal Regulation 27 CFR 555.53 - Licensees and permits issued under this part are not transferable to another person. In the event of the lease, sale, or other转让 of the business or operations covered by the license or permit, the successor must obtain the license or permit required by this part before beginning business or operations.

3. Alteration or Changes to the License or Permit: Alterations or changes in the original license or permit or in duplicate thereof violates 18 U.S.C. 1001, an offense punishable by imprisonment for not more than 5 years and/or a fine of not more than $250,000.

NOTICES

1. Any change in trade name or control of this business or operations MUST be reported within 30 days of the change to the Chief, Federal Explosives Licensing Center (FELC), 244 Needy Road, Martinsburg, WV 25405-9431. (27 CFR 555.56-555.57). A licensee or permittee who reports a Change of Control must, upon expiration of the license or permit, file an ATF Form 5400.13/5400.16.

2. Under § 555.46, Renewal of License/Permit, if a licensee or permittee intends to continue the business or operations described on a license or permit issued under this part during any portion of the ensuing year, the licensee or permittee shall, unless otherwise notified in writing by the Chief, FELC, execute and file with ATF prior to the expiration of the license or permit an application for a license or permit renewal, ATF Form 5400.14/5400.15 Part III, in accordance with the instructions on the form, and the required fee. In the event the licensee or permittee does not timely file an ATF Form 5400.14/5400.15 Part III, the licensee or permittee must file an ATF Form 5400.13/5400.16 as required by § 555.45, and obtain the required license or permit before continuing business or operations. A renewal application will automatically be mailed by ATF to the "mailing address" on the license or permit approximately 60 days prior to the expiration date of the license or permit. If the application is not received 30 days prior to the expiration date, the licensee or permittee should contact the FELC. Note: The uses-limited permits are not renewable.

3. This license or permit is conditioned upon compliance by you with the Clean Water Act (33 U.S.C. § 1341(a)).

4. THIS LICENSE OR PERMIT MUST BE POSTED AND KEPT AVAILABLE FOR INSPECTION (27 CFR 555.101).

Federal Explosives License (FEL) Customer Service Information

(Continued from front)

Discontinuance of Business (27 CFR 555.61)(27 CFR 555.128). Where an explosives materials business or operations is succeeded by a new licensee or permittee, the records prescribed by this subpart shall appropriately reflect such facts and shall be delivered to the successor, or may be, within 30 days following business discontinuance, delivered to the ATF Out-of-Business Records Center, 244 Needy Road, Martinsburg, WV 25405, or to any ATF office in the division in which the business was located. Where discontinuance of the business is absolute, the records shall be delivered within 30 days following the business discontinuance to the ATF Out-of-Business Records Center, 244 Needy Road, Martinsburg, WV 25405, or to any ATF office in the division in which the business was located.

Explosive materials must be stored in conformance with requirements set forth in 27 CFR, Part 55. It is unlawful for any person to store any explosive materials in a manner not in conformity with these regulations.

TO REPORT LOST OR STOLEN EXPLOSIVES, YOU MUST IMMEDIATELY NOTIFY ATF:
CALL TOLL FREE - (888) ATF-BOMB

Federal Explosives Licensing Center (FELC) Toll-free number: (877) 283-3352
244 Needy Road Martinsburg, WV 25405-9431
Fax number: (304) 616-4401
Email: FELC@atf.gov

ATF Hotline Numbers
Arsenal Hotline: 1-888-ATF-FIRE (1-888-283-3473)
Bomb Hotline: 1-888-ATF-BOMB (1-888-283-2662)
Report Illegal Firearms Activity: 1-800-ATF-GUNS (1-800-283-4867)
Firearms Theft Hotline: 1-888-990-9272
Report Stolen, Hijacked or Seized Cigarettes: 1-800-659-6242
Other Criminal Activity: 1-888-ATF-TIPS (1-888-283-8477)
NOTICE OF CLEARANCE

for individuals transporting, shipping, receiving, or possessing explosive materials.

ISSUED TO: RBG INC
NOTICE DATE: 09/25/2017
EXPIRATION DATE: This Notice expires when superseded by a newer Notice which will list all current responsible persons and employee possessors, or when the license or permit expires - whichever comes first.

WARNING: Only those individuals listed below as RESPONSIBLE PERSONS and EMPLOYEE POSSESSORS with a background clearance status of "CLEARED" or "PENDING" are authorized to transport, ship, receive, or possess explosive materials in the course of employment with you.

DENIED" STATUS. If an employee possesses has a background clearance status of "DENIED", you MUST take immediate steps to remove the employee from a position requiring the transporting, shipping, receiving, or possessing of explosive materials. Also, if the employee has been listed as a person authorized to accept delivery of explosive materials, you MUST remove the employee from such list and immediately, and in no event later than the second business day after such change, notify distributors of such change, as stated in 27 CFR 555.33(c).

CHANGE IN RESPONSIBLE PERSONS. You MUST report any change in responsible persons to the FELC, Federal Explosives Licensing Center (FELC), within 30 days of the change and any new responsible persons MUST include "appropriate identifying information" as defined in 27 CFR 555.54. Fingerprints and photos are NOT required, however, they will be required upon renewal of the license or permit.

CHANGE OF EMPLOYEES. You MUST report any change in employee possessors to the FELC, FELC, within 30 days. Reports relating to newly hired employees must be submitted on ATF Form 5400.28 for FELC employees.

This 'Notice of Clearance' is provided to you as required by 18 U.S.C. 843(h) and MUST be retained as part of your permanent records and be made available for examination or inspection by ATF officers as required by 27 CFR 555.121. If you receive a Notice subsequent to this Notice, this Notice will no longer be valid.

In accordance with 27 CFR 555.33, Background Checks and Clearances, and 27 CFR 555.57, Change of Control, Change in Responsible Persons, and Change of Employees, ATF's Federal Explosives Licensing Center (FELC) has conducted background checks on the individual(s) you identified as a responsible person(s) and an employee/possessor(s) on your application, or reported after the issuance of your license/permit.

The following is a SUMMARY of the results of the background checks conducted on the individuals you reported as responsible persons and employee/possessors. ATF will be notifying ALL individuals listed on this document of their respective status by separate letter mailed to their residence address.

PLEASE BE ADVISED THAT IT IS UNLAWFUL FOR ANY PERSON REFLECTING A STATUS OF "DENIED" TO TRANSPORT, SHIP, RECEIVE, OR POSSESS EXPLOSIVE MATERIALS.

Please carefully review this Notice to ensure that all the information is accurate. If this Notice is incorrect, please return the Notice to the Chief, FELC, with a statement showing the nature of the error(s). The Chief, FELC, shall correct the error, and return a corrected Notice.

Number of RESPONSIBLE PERSON(S):
Number of EMPLOYEE POSSESSOR(S):

<table>
<thead>
<tr>
<th>LAST NAME, First Name, Middle Name</th>
<th>Clearance Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>RESPONSIBLE PERSONS:</td>
<td></td>
</tr>
<tr>
<td>001 GROESCHEN, ROBERT A</td>
<td>Cleared</td>
</tr>
<tr>
<td>002 HORMANN, TODD A</td>
<td>Cleared</td>
</tr>
<tr>
<td>EMPLOYEE POSSESSORS:</td>
<td></td>
</tr>
<tr>
<td>001 BREWER, ALSTON JR</td>
<td>Cleared</td>
</tr>
<tr>
<td>002 BROWN, BERNARD JAY JR</td>
<td>Cleared</td>
</tr>
<tr>
<td>003 CASSILLY, LOBAGHI ANNE</td>
<td>Cleared</td>
</tr>
</tbody>
</table>

**continued**
Appendix A

Compliance with Federal ATF permit and associated requirements

License/Permit Number: 4-OH-109-34-0K-01141

*ATF only regulates inflators. ATF does not regulate complete assembled air bags (modules).

Resource One will meet all the requirements of our ATF permit and 27 CFR Part 55. This includes the following requirements for Type 4 Magazines (low explosives) and test results:

- Resource One uses an outside storage magazine which is a storage trailer. The storage magazine is fire-resistant, weather-resistant, and theft-resistant.
- Resource One has placed cement blocks around the bottom edge to meet ATF requirements in 27 CFR Part 55. The trailers will remain in the dock door and will not be removed.
- The selected location of the storage magazine on-site meets the ATF requirements in 27 CFR Part 55.
- The storage magazine is locked with a locking mechanism that complies with the ATF requirements in 27 CFR Part 55.
- The doors and hinges on the storage magazine are designed in a manner to comply with the ATF requirements in 27 CFR Part 55.
- Exposed metal components inside storage magazine painted with non-sparking paint to comply with the ATF requirements in 27 CFR Part 55.
- Resource One will use non-sparking materials and tools.
- Resource One has trained all employees on proper storage and security requirements associated with the ATF requirements in 27 CFR Part 55.
- All Resource One employees involved in the management of the inflators went through a security background check by ATF. All future employees handling inflators will fill out Employee Possessor Questionnaire Form 5400.28.
- Resource One’s completed storage magazine was approved by the Ohio State Fire Marshal’s office and Federal ATF.
- Resource One will fill-out a Daily Summary of Magazine Transactions (DSMT) to maintain accurate record keeping as inflators enter and exit storage magazine required by ATF Publication 5400.18.
- DOT Explosives Lab Test confirmed material resulting from Resource One’s Shredding operation proved as non-explosive.
Appendix A

Resource One currently has a safety procedure for employees involved in the inflator program to follow, however this procedure has not been finalized since the process is not complete. Once the process is fully implemented, Resource One will complete a finalized procedure for all employees involved in the management of inflators. Training will be completed on the procedure. This procedure will include all environmental, ATF, health and safety requirements, and best management practices.

Resource One maintains an annual compliance calendar for all environmental and ATF regulatory requirements and best management practices. This calendar details all tasks necessary to maintain compliance and continuous improvement. The calendar defines each task, the responsible employee(s), and due dates for each task. Resource One’s management team monitors these tasks and due dates each month. In addition, Resource One has a third-party professional auditor conduct an audit each quarter of compliance including the tasks in the compliance calendar.
Appendix B

How Resource One manages the air bags to protect human health and the environment

Resource One invested significant time and expense into choosing the best option for handling and processing of the air bags. After reviewing several options, Resource One chose a shredder design with a chamber that is water submerged. This allows the automotive air bags to be processed in a highly safe manner.

The predominant hazardous/explosive ingredient in the air bags is ammonium nitrate. With the use of an underwater shredder, the air bags are deployed in a safe manner. Additionally, Resource One in cooperation with the shredder company tested several units and sent the shredded material to a DOT explosives laboratory for testing. The results all came back negative for explosiveness.

During the initial start-up phase, any wastewater that results from the use of the shredding equipment will be collected in totes. After collection of the wastewater, Resource One will be testing the water to complete a profile. The end goal is to install a sanitary line to discharge the wastewater to the Village of Covington. Resource One has been working with Mike Busse from The Village of Covington Ohio and an engineering firm to address a sanitary tap-in. If the discharge requires an indirect discharge permit, Resource One has already been in contact with Matt Walbridge from Ohio EPA SWDO for a possible discharge permit. Additionally, if any treatment on-site is required prior to discharge, Resource One has been in contact with Bob Ostendorf from Ohio EPA SWDO to address the need for a PTI for the installation of any treatment tanks. This is all contingent on the results of the sampling after the shredding is commenced.

The entire shredding process will be contained within the building at 2000 Mote Dr. in Covington OH. This includes the shredder, water, conveyors, and the final container for the shredded material. There will be no exposure to the environment.

Resource One designed the shredding units with a goal of avoiding needing to store inflators in the ATF approved magazine overnight. If the storage magazine is needed, it will be locked and controlled as approved by ATF. During processing, the automotive air bags will be loaded onto a conveyor that lifts the units up into a funnel that feeds the shredder. All personnel who handle the automotive air bags are trained on safe handling. During the set-up of the process, Resource One will be using our professional Environmental, Health and Safety consultant in conjunction with our Safety Coordinator, to conduct a thorough Job Hazard analysis. This includes abating any potential uncontrolled sources of static or energy that could lead to deployment of the air bags. The job hazard analysis will include an assessment of proper personal protective equipment for all employees, proper handling techniques, and a noise evaluation.
Appendix B

Resource One chose not to remove any inflators from the automotive air bag modules prior to shredding to minimize handling and risk for our employees. The goal is to reduce as much people handling as possible to reduce risk and to reach maximum efficiency.

Resource One will conduct training on all safety, environmental and ATF requirements throughout the process. The training will include proper handling, personal protective equipment requirements, equipment shutdown, and emergency procedures. Resource One has a procedure that covers the safety issues concerning the processing of automotive air bags.

Appendix J: Automotive Safety Device Recycling (covers safety elements & PPE)

The automotive air bag processing will be contained to designated areas in the facility. These areas will be equipped with necessary safety equipment such as Personal Protective Equipment, anti-static devices, grounding equipment, hermetically sealed electric supply to the shredders etc. All shredding will be submerged underwater to reduce risk. Additionally, the shredding units will be elevated above the ground. The deployment of the air bags in the shredder will be at a safe distance and will not have any impact on employee health or safety.

Since the shredding is done inside the building, this process will not have an impact on the surrounding community. Visitors to Resource One will have to go through a safety review and must be escorted by a Resource One employee who is ATF approved.

As stated above, Resource One maintains an annual compliance calendar for all environmental and ATF regulatory requirements and best management practices. Resource One will also maintain a compliance calendar for all health and safety requirements. These calendars detail all tasks necessary to maintain compliance and continuous improvement. The calendars define each task, the responsible employee(s), and due dates for each task. Resource One’s management team monitors these tasks and due dates each month. In addition, Resource One has a third-party professional auditor conduct an audit each quarter of compliance including the tasks in each compliance calendar for environmental, ATF, health, and safety requirements.
Resource One Liability Insurance

**CERTIFICATE OF LIABILITY INSURANCE**

This certificate is issued as a matter of information only and confers no rights upon the certificate holder. This certificate does not affirmatively or negatively amend, extend or alter the coverage afforded by the policies below. This certificate of insurance does not constitute a contract between the issuing insurer(s), authorized representative or producer, and the certificate holder.

**IMPORTANT:** If the certificate holder is an additional insured, the policy(ies) must be endorsed. If subrogation is waived, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

<table>
<thead>
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<td>dba Resource One</td>
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**COVERAGES**

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**DESCRIPTION OF OPERATIONS - LOCATIONS - VEHICLES (ACORD 101, Additional Information Schedule may be attached if more space is required)**

Proof of Insurance Only.

**CERTIFICATE HOLDER CANCELLATION**

Proof of Insurance Only

Should any of the above described policies be cancelled before the expiration date thereof, notice will be delivered in accordance with the policy provisions.

**AUTHORIZED REPRESENTATIVE**

[Signature]

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LIST OF FIGURES

1 - TITLE SHEET (SITE LOCATION MAP & AERIAL MAP)
2 - SITE PLAN
Resource One
6043 Interstate Circle
Cincinnati, OH 45242

Attention: Mr. Todd Hormann
937-539-0945

TITLE: Recommended Shipping Classification for Spent Airbag Inflator Materials After Wet Shredding


The recommended shipping name, classification, UN number and packing group for the Shredded/Spent Airbag Inflator Materials are:

**Not Regulated as Class 1**

This recommendation IS NOT package dependent.

If you have any questions concerning this report or require further assistance, please call.

Examination by:

Bernadette N. Reyes, Operations Manager
Senior Explosives Engineer
DOT Examiner
Title: Examination and Recommendation for Explosives Classification for the Spent Airbag Inflator Materials After Wet Shredding

Report No.: 2017119
SCE No.: 1671
Examiner: Bernadette N. Reyes

Resource One
6043 Interstate Circle
Cincinnati, OH 45242

Attention: Mr. Todd Hormann
937-539-0945

This report covers testing on the packaged article identified as:

Spent Airbag Inflator Materials After Wet Shredding

Submitted for testing and analysis by: Resource One

1.0 Recommended UN Classification

Recommended UN Classification for the above article according to 49 CFR Parts 100-185 - Transportation:

a. Proper shipping name: Not Regulated as a Class 1 Material
b. Hazard Class: Not Class 1

2.0 Product Description:

The module consisting of the spent (entire) airbag inflators - metal (with nylon bag) and canister are shown in Figures 1 through 3. The spent airbag inflator parts were shredded under water and received at SCE moistened in 5-gal buckets. The sample moisture was estimated at an average of 20-25% weight by water.
3.0 Method of Examination: TESTING

4.0 Test Location:

UN Testing was performed on 10/27-11/06/2017 at SCE Facilities in Forreston, IL.

5.0 Packaging Examined:

- Inner Packaging: No inner packaging
- Intermediate Packaging: No intermediate packaging
- Outer Packaging: 5-gal plastic bucket with lid
6.0 Test Description (UN Manual of Tests and Criteria, 6th revised edition)

6.1 UN Test 1(a): UN gap test

The result of this test was negative, no hole was punched in the witness plate in the three test trials conducted. In the test trials, the confining tube was fragmented due to the booster charge. Refer to Figures 4 through 6. A baseline test was also conducted with an empty tube for comparison, and result showed tube was damaged and a clean hole on the witness plate resulting from the booster charge. See Figure 7. Another tube filled with inert material (collected from the bonfire test) for reference was also tested. The tube from the Test Trial 5 with the debris of the Spent Airbag Inflator Material is shown in Figure 8. Result showed similar tube damage as the ones with the spent inflators after wet shredding prior to the bonfire test.

Per the requirements of the UN gap test, the spent airbag parts did not propagate/sustain a detonation.

Figure 4: Spent Airbag Initiator tube after Test Trial 1. Figure 5: Spent Airbag Initiator tube after Test Trial 2.

Figure 6: Spent Airbag Initiator tube after Test Trial 3. Figure 7: Test Trial 4 without Sample for Reference.
6.2 UN Test 6(c): External Fire (bonfire) test:

The spent articles in the 5 gallon buckets were tested in the bonfire and the bonfire test results indicated that there was no mass detonation, no fragmentation, no projectiles, and no fireball due to the articles tested. See Figures 9 and 10.
7.0 Conclusion:

The Spent Airbag Inflator Materials After Wet Shredding are incapable of sustaining detonation, mass explosion projected or fire hood.

8.0 Recommendation:

Spent Airbag Inflator Materials after wet Shredding, with moisture not less than 20% should not be regulated as Class 1.

9.0 The recommended packaging, marking, and labeling for surface transportation (rail or highway) may be found in CFR 49 sections as follows:

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<tbody>
<tr>
<td>Marking</td>
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<tr>
<td>Labeling</td>
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</tr>
</tbody>
</table>

If you have any questions about this requirement or how to proceed please do not hesitate to call us.

I hereby certify that this classification recommendation report, and all evaluation, examination, and testing carried out by Safety Consulting Engineers in preparation of this report are in full compliance with the applicable requirements of the HMR and this approval.

Certification and Examination by:

[Signature]

Bernadette N. Reyes, Operations Manager  
Senior Explosives Engineer  
DOT Examiner

Safety Consulting Engineers, Inc.  
A DEKRA Insight company  
www.sceinc.com
Waste Analysis Plan

February 19, 2018

Appendix F
1) Background:

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

The term “automotive air bags” includes all the following automotive safety device units and terms:
- Air bags (driver and passenger side);
- Side curtain air bags;
- Seat belt pretensioners;
- Inflators (ATF regulated); and
- Modules (complete assembled units).

The current position of US EPA is that automotive air bags that have never been installed in a vehicle would be considered a “Commercial Chemical Product” and if recycled, would not be a hazardous waste. US EPA is currently evaluating their position on this and will be issuing guidance in the future.

Automotive air bags that have been installed in a vehicle and then removed, would be a “spent material” and therefore a hazardous waste due to the characteristic of ignitability and reactivity (D001 & D003). This interpretation stems from the US EPA’s June 23, 2017 Memorandum (Recalled Takata Airbag Inflators) issued by Barnes Johnson, Director of the Office of Resource Conservation and Recovery.

Resource One will be managing all automotive air bags as Hazardous Waste once they arrive at the facility in Covington Ohio. When US EPA issues their guidance on automotive air bags that have never been installed in a vehicle, and if this guidance maintains that automotive air bags that have never installed in a vehicle are not Hazardous Waste if recycled. Then Ohio EPA and Resource One will address changes to this exemption to exclude automotive air bags that have never installed in a vehicle.

2) Waste Description

For the purpose of this plan, automotive air bags at Resource One includes all the following automotive safety device units and terms:
- Air bags (driver and passenger side);
- Side curtain air bags;
- Seat belt pretensioners;
- Inflators (ATF regulated); and
- Modules (complete assembled units).

3) Waste Analysis Plan

UN Testing report.
Wastewater analysis.
Rejection plan.
Annual review.
UN Testing:

Explosives Evaluation. The automotive air bags were tested after the shredding process by:

Safety Consulting Engineers, Inc.

Test report date: 11/7/2017

This UN Testing was performed on 10/27 – 11/06/2017.

The purpose of this test was to determine if the processed automotive air bags exhibited any explosive nature after processing. This test covered an overall representation of the automotive air bags.

Result: NEGATIVE for explosive.

See Appendix E: Transportation Classification Report (UN Testing):

Process Water Analysis:

The shredding process may produce up to a maximum of 700 gallons of wastewater each day from each shredding device.

Wastewater Testing Plan.

During the initial start-up phase, any wastewater that results from the use of the shredding equipment will be collected in totes. After collection of the wastewater, Resource One will test the water to complete a profile. The end goal is to install a sanitary line to discharge the wastewater to the Village of Covington, Ohio. Resource One has been working with Mike Busse from The Village of Covington and an engineering firm to address a sanitary tap-in. If the discharge requires an indirect discharge permit, Resource One has already been in contact with Matt Walbridge from Ohio EPA SWDO for a possible discharge permit. Additionally, if any treatment on-site is required prior to discharge, Resource One has been in contact with Bob Ostendorf from Ohio EPA SWDO to address the need for a PTI for the installation of any treatment equipment.

This is all contingent on the results of the sampling after the shredding is commenced. The primary chemical of concern is ammonium nitrate.

The entire shredding process will be contained within the building at 2000 Mote Dr. in Covington, Ohio. This includes the shredder, water, conveyors, and the final container for the shredded material. There will be no exposure to the environment.

After the initial wastewater is profiled, Resource One staff will evaluate the wastewater annually to determine if any changes have occurred.

During the initial start-up phase, the wastewater will be checked daily as part of the operational checks. Operators will check the wastewater for any unusual conditions such as:
Automotive Air Bag Recycling — Waste Analysis Plan

February 19, 2018

- Odor;
- Discoloration;
- Oils and grease;
- Cloudiness;
- Coolness or heat generated (endo or exothermic).

If Resource One can discharge to The Village of Covington, Ohio, the inspections of the wastewater containers would end. At that time, Resource One would comply with any applicable The Village of Covington sewer use by-laws or Ohio EPA indirect discharge requirements.

Rejection Plan:

Resource One will check each shipment of automotive air bags that arrive at the facility. The Resource One employee will check the shipping paper or hazardous waste manifest to ensure that it matches what is arriving on the transport vehicle. If there is a discrepancy, the employee will notify his/her supervisor immediately. The supervisor will contact the manager. The driver will be detained until the discrepancy is settled and appropriate documentation is obtained and signed. If the issue cannot be corrected and it involves a discrepancy involving a different amount on the shipping paper versus what is on the transport vehicle, the shipping company will be contacted. If the shipping company cannot resolve the discrepancy, then Resource One will contact the local authorities.

If a shipment arrives at Resource One and contains hazardous waste other than automotive air bags, the Resource One employee will detain the driver and contact his/her supervisor immediately. The shipment will be rejected, and Ohio EPA will be notified immediately. The Resource One supervisor will contact the shipper of the material.

Annual Review:

Resource One will evaluate all types of automotive air bags received at the facility to determine if any changes have occurred. Resource One staff will look at the types of automotive air bags received, and the component used to charge the inflator to determine if any changes would impact the process at Resource One.

4) Resource One procedure:

Resource One will check each load/shipment of automotive air bags that arrive at the facility to ensure they are consistent with the shipping documents from the automotive company or a 3rd party representative of the automotive company.

Resource One will visually check the following:
- Shipment is consistent with the shipping papers;
- There are no unusual circumstances with the packaging; and
- There are no obvious signs of significant damage or stress with the packaging.

Resource One also has a procedure that describes how to handle the automotive air bags in a manner to protect human health.
Daily Operation Check:

Resource One staff will conduct and document a daily operation inspection to ensure the shredding equipment is operating properly and all safety measures are in place and working properly. The inspection will include the following:

- Safety issues. Proper grounding of equipment, shredders and ancillary equipment guards are on in place and structurally sound.
- PPE and spill response equipment available and in place.
- Emergency response communication methods available and in good working order.
- Automotive air bag storage. Ensure there are no unusual circumstances such as severely damaged packaging or other indicators representing a potential safety or environmental issue.
- Fire extinguishers – checked visually daily. Monthly inspections will be documented per OSHA requirements.
- Ensure that no open flames or sparking equipment is within 25 feet of any automotive air bag storage.
- Ensure that the security system including cameras are working properly.
- Wastewater containment. Checking for leaks in equipment or containers.
- Condition of scrap containers including checking for leaks.
- Outside conditions for any exposure or unusual conditions.
- Maintain isle space to allow the free movement of emergency response equipment around the outside of the automotive air bag storage areas. This does not apply to the ATF storage magazine(trailers). The magazine will comply with applicable ATF requirements.

This daily operational inspection will be documented on a daily inspection form.

5) Plan Approval

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<th>Title</th>
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<tbody>
<tr>
<td>Rob Georger</td>
<td>Vice Pres.</td>
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<table>
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RESOURCE ONE COVINGTON

- RCRA CONTINGENCY PLAN
  - APPENDIX G

Prepared For
Resource One Covington

February 2018
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RCRA CONTINGENCY PLAN

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Appendices

I:  Emergency Contact List
II:  Facility Layout Map
1.0 EXECUTIVE SUMMARY

A RCRA (Resource Conservation Recovery Act) Plan is required for this facility because Resource One Covington Ohio (Resource One) is considered a processor and recycler of hazardous waste materials (automotive air bags). To assist Resource One in fulfilling its commitment to a cleaner environment and to ensure compliance with the requirements of the Resource Conservation and Recovery Act (RCRA), this RCRA Contingency Plan has been prepared.

The Plan addresses response actions, which will be implemented at the Resource One facility in the event of a fire, explosion, or any unplanned release of hazardous waste to the environment. Key elements of the Plan are arrangements with emergency response teams, designation of Facility Response Coordinators at the facility, emergency procedures and reporting, equipment requirements, and an evacuation plan.

2.0 INTRODUCTION

2.1 Purpose and Implementation

Resource One has prepared this Plan to include best management practices (BMPs) to prevent or minimize the hazards to human health or the environment from fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. Resource One has developed procedures for inspection, maintenance, and training. This Plan will enable the facility to implement these procedures.

The provisions of this Plan shall be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or waste constituents, which could threaten human health or the environment. A copy of this Plan and all revisions to the Plan are maintained at the facility.

The EPA Identification Number for the Resource One facility is OHR000200097.

2.2 Scope

This Plan addresses inspection, recordkeeping, security, training, and worker safety and describes the actions facility personnel shall take in response to fire, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. The Plan identifies existing conditions within the facility, describes agreements with local agencies, designates Facility Response Coordinators, lists emergency equipment, and establishes evacuation plans and emergency procedures.

2.3 Areas that Pose Highest Threat

The following table summarizes the types of hazardous wastes and where they are generated.
Table 1: Hazardous Waste Storage Area

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<th>Location</th>
<th>Maximum Quantity/Type</th>
<th>Containment</th>
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<td>Automotive Air Bags (modules)</td>
<td>Warehouse</td>
<td>(6) Semi Trailer Loads</td>
<td>Building Containment</td>
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<tr>
<td>Inflators</td>
<td>ATF approved storage magazines</td>
<td>(5) Magazines (trailers)</td>
<td>Trailer Containment</td>
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2.4 Facility Security

Resource One has implemented a security program to minimize the possibility of discharge due to acts of sabotage or vandalism and to provide for release detection during non-operating and operating hours.

Resource One has a security system that includes video cameras and motion sensors. Cameras are located at every exterior door (overhead and people doors).

Only the supervisors and manager of the facility have the access code for the alarm system. The company that monitors the security system has a Resource One call list. If the security company does not reach a Resource One employee, the police are called immediately.

Access control:
During daytime business hours, all people doors will be locked except the lobby door from the outside. The lobby door on the inside will be locked. All visitors will hit the buzzer/ringer located inside the lobby to request access. All visitors must sign-in on the visitor register in the front lobby.

During 2nd and 3rd shift hours, all doors will be locked in the same manner as daytime business hours. In addition, the security system will be engaged within “stay mode” while all employees are working. The Team Leader, Supervisor or Manager will only disengage the security system during breaks, lunch, and when employees are arriving and leaving.

Non-processing times (weekend and holidays). All doors will be locked, and the security system will be fully engaged in the “away mode.”

Truck traffic:
All trucks entering the site will be logged or the driver will sign-in on a log sheet. Any trucks that are loaded or unloaded will be checked-in by a Resource One employee. Truck drivers shall check-in at the Shipping & Receiving people door at the side of the facility. This door will be locked, however Resource One will have a buzzer/ringer at the door to alert Resource One employees.
Visitors and Contractors:
All visitors and contractors to Resource One will be accompanied by a Resource One employee at all times. The only exception to this is for contractors that have been pre-approved by Resource One and have been through safety training. On-going contractors who have been pre-approved and have been trained on the safety requirements, will be issued a “Contractor’s Badge.”

Employees:
All Resource One employees go through pre-employment screening. If the employee will be working in the automotive air bag processing, additional ATF approval is required. All Resource One employees have an Employee Identification card.

2.5 Hazardous Waste Satellite Accumulation Areas
Resource one will be shredding automotive airbags and inflators at the facility with process equipment. The shredded material will then be sent off to a recycling facility. The shredding area, warehouse storage and ATF magazines (trailers) will be the only areas in which the hazardous waste recyclable materials will reside.

2.5.1 Known Hazardous Wastes Generated On-site:

   D001: Characteristic ignitable wastes
   D003: Characteristic reactive wastes

3.0 FACILITY RESPONSE COORDINATORS
At all times there will be at least one employee either at the facility or on call with the responsibility for coordinating all internal emergency response measures. This Facility Response Coordinators will be familiar with all aspects of this Plan and will have the authority to commit the resources needed to implement the provisions of the Plan (see Appendix 1 – Emergency Contact List).

4.0 EMERGENCY EQUIPMENT

4.1 Hazardous Waste Spill Control and Containment
Hazardous waste recycling areas are located at the Resource One Facility. Should a spill occur at these locations, it would be from a box, container, or equipment failure while the waste is either in storage, processing, or during transfer to the ATF magazine (inflators only). Resource One has sufficient spill control equipment to contain and control these types of spills. Resource One has sufficient emergency stops on processing equipment (shredder and conveyors). Procedures for cleanup and the spill control equipment are described in subsequent sections of the Plan.
4.2 Emergency Response Equipment

Resource One has sufficient on-site minor spill response equipment to respond to minor spills. Larger spills or those that require SCBA, fires, explosions, and other emergencies will be handled by the contracted emergency spill responder, local fire department, and LEPC. Resource One has a contract with an outside emergency response contractor for hazardous waste and chemical spills. The contractor is identified in Appendix 1.

4.2.1 Fire Extinguishers

Fire extinguishers are located at the facility and are serviced by an outside qualified contractor. Sprinklers are also located throughout the facility. As part of the ongoing inspection program and consistent with the Occupation Safety and Health Administration (OSHA), the fire extinguishers are inspected visually daily and monthly by a Resource One employee and annually by an outside contractor and serviced as needed. Inspection records are maintained by Resource One.

4.2.2 Spill Control Equipment

Spill control equipment at the Resource One facility includes the following materials with a description of their capabilities if not self-explanatory:

- Socks — absorbs liquid materials
- Absorbent Padding — absorbs liquid materials
- Solidifying Agent — solidifies liquid materials
- Booms — absorbs liquid materials
- Emergency alarm system
- First aid kits
- Safety showers/eyewash stations
- Miscellaneous PPE
- Brooms, dust pans, shovels, rags, mops, buckets, bags

Spill kit contents should be replaced as soon as they are used.

4.3 Communication and Alarms Systems

Manager and supervisors will use a whistle and bullhorn to communicate emergencies. The whistle will be used to signal an evacuation, and the bullhorn will be used to direct employees for taking shelter. Also, employees have access to telephones or radios in the event of an emergency.

Resource One has a security system that includes video cameras and motion sensors. Cameras are located at the entrance to the facility and at the area where the automotive air bag processing occurs. The facility is locked, and the alarm is set each day when the last supervisor or manager leaves.
Only the supervisors and manager of the facility have the access code for the alarm system. The company that monitors the security system has a Resource One call list. If the security company does not reach a Resource One employee, the police are called immediately.

5.0 INSPECTION

Inspections take place daily. The following items/areas are checked during the daily inspection:

- Safety issues. Proper grounding of equipment, shredders and ancillary equipment guard are on in place and structurally sound. PPE and spill response equipment available and in place.
- Emergency response communication methods available and in good working order.
- Automotive air bag storage. Ensure there are no unusual circumstances such as severely damaged packaging or other indicators representing a potential safety or environmental issue.
- Fire extinguishers – checked visually daily. Monthly inspections will be documented per OSHA requirements.
- Ensure that no open flames or sparking equipment is within 25 feet of any automotive air bag storage.
- Ensure that the security system including cameras are working properly.
- Wastewater containment. Checking for leaks in equipment or containers.
- Condition of scrap containers including checking for leaks.
- Outside conditions for any exposure or unusual conditions.
- Maintain isle space around the outside of the automotive air bag storage areas. This does not apply to the ATF storage magazine(trailers). Isle space should be at least 4 feet.

This daily operational inspection will be documented on a daily inspection form.

Wastewater containers will be check during the startup phase of this operation to check for the following:

- Wastewater for significant Odor, Discoloration, Oils and grease, Cloudiness, or Coolness or heat generated (endo or exothermic). Check the integrity of the wastewater containers.

After the start-up phase, Resource One will evaluate the wastewater to determine if it can be discharged to The Village of Covington, Ohio. If so, Resource One will work with The Village of Covington, Ohio staff and Ohio EPA to obtain applicable discharge permits and PTIs for any treatment holding tanks that may be necessary. If Resource One can discharge to The Village of Covington, Ohio, the inspections of the wastewater containers would end. At that time, Resource One would comply with any applicable The Village of Covington or Ohio EPA indirect discharge requirements.

Inspection forms are kept on file. Inspection records are signed by the appropriate inspector, are made a part of the environmental files, and are maintained for a period of three years.
6.0 MAINTENANCE AND TESTING

Resource One operates and maintains its facility in good condition. An ongoing preventive maintenance program is in place, which reduces the potential for equipment failure and generation of hazardous wastes. The on-going training of employees further reduces the potential for human error in handling hazardous waste recycling material.

Manufacturer’s recommendations are followed for preventive maintenance on equipment. Emergency equipment is routinely inspected and maintained.

7.0 ASSOCIATE TRAINING

7.1 Facility Response Coordinator

The Facility Response Coordinators for the Resource One facility are qualified by receiving HAZWOPER Awareness Level training as part of their DOT HAZMAT Training initially and every three years for refresher. Furthermore, the Facility Response Coordinators receive regular scheduled training as part of the associate training provision of this Plan.

7.2 Associate Training

All Resource One employees involved in the air bag processing will be trained on the following prior to performing any function associated with the automotive air bags:

- Safety procedure associated with the air bag processing.
- Inspection requirements.
- Training on this Hazardous Waste Contingency Plan including emergency response methods.
- Applicable requirements in this application including pollution prevention.

The Hazardous Waste Contingency Plan training will include the following:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.
- Key parameters for automatic waste feed cutoff systems.
- Communication and alarm systems.
- Response to fire and explosions.
- Response to Groundwater contamination incidents.
- Shutdown of operations.

7.3 Associate Job Descriptions

All employees who respond to an emergency will have specific job assignments. The only employees authorized to respond to an emergency are the Facility Response Coordinators and those employees who routinely work with the hazardous waste recycling materials and have received required training.
8.0 EVACUATION PLANS

Should evacuation of the facility be required, the evacuation will be announced by the manager or supervisors using a whistle. If it is necessary to take shelter, the manager or supervisors will use a bullhorn to announce and provide direction to the employees.

Emergency exits and employee assembly areas are designated on posters located throughout the facility. The Facility Response Coordinator and supervisors are responsible for directing the orderly evacuation of employees from their workstations to the designated outside assembly area. The Facility Response Coordinator and supervisors are also responsible to account for all employees from their work areas that are present at the assembly area.

9.0 EMERGENCY PROCEDURES

This section deals with how to respond in the event of an emergency. Also, the Automotive Safety Device Recycling procedure governs the shredding process in all safety aspects.

9.1 Discovery and Initial Response Procedures

Resource One personnel informed of or discovering evidence of a spill, release, explosion, or an emergency should:

- If it can be done safely, quickly assess the nature and extent of the emergency.
- If appropriate and if it can be done safely, shut off equipment and valves. Leave the zone of danger.
- Immediately notify the Facility Response Coordinators (FRC) or supervisor and describe the nature or severity of the spill or emergency.
- Explain to the FRC the extent of the emergency, including information on the type and severity.
- If it can be done safely, keep others out of the area. If necessary, set up barriers. Remain in the vicinity until the Emergency Members arrive.
- For each large spill that occurs, the Facility Response Coordinator will prepare a record of the spill incident. The cause of the spill will be identified and the corrective actions taken by the facility to handle and remove the spilled materials. Evaluate the event and take steps to prevent reoccurrences of such incidents in the future.

9.2 Internal Notifications

1. Notify the FRC.

9.3 External Notification

1. If it is determined that an emergency situation cannot be handled safely by internal personnel, notify external emergency response personnel immediately. Names and phone numbers of External Emergency Responders are included in 9.4 Release Reporting.
Resource One – Hazardous Waste Contingency Plan

For the purpose of this Plan, releases and spills are classified into two categories:

**Minor** would be a noticeable small leak of chemical from a lone automotive air bag or inflator.

**Major** would be a noticeable leak from a group, container, or pallet of automotive air bags or inflators.

These values are approximate and will be based on quick assessment by Resource One FRC (see Appendix I for a list of Facility Response Coordinators).

When reporting an emergency incident, the person reporting the incident should provide the following information:

- Personnel injured, if any;
- Specific location;
- Nature of incident (fire, spill, explosion, etc.);
- Material involved (hazardous waste, chemicals, etc.);
- Estimated quantity of material; and
- Any incident specific safety or environmental concerns.

In the event of a major spill, containment is the priority. If containment cannot be safely achieved by trained employees, the Facility Response Coordinator will call for assistance by the fire department or spill response contractor. In either case, booms and absorbents will be used as needed to contain the spill. Absorbent materials will be placed across the flow path of the material. Any recovered material from the spill and spill absorbent, used booms, etc., will be properly disposed of or recycled in accordance with applicable regulations.

In the event of an automotive air bag or inflator activation other than in the shredding process, employees should immediately evacuate to the designated evacuation area.

The following is a list of equipment available on-site for emergency use at the facility:

- Fire hydrants
- Automatic overhead sprinklers
- Fire extinguishers
- Brooms, shovels, rags, mops
- Spill kits
- Emergency alarm system
- First aid kits
- Safety eyewash stations
- Miscellaneous PPE
A spill response kit with absorbent material are maintained in the following locations:

- Shredding Process Area
- Warehouse storage area
- Next to ATF storage magazines

As new locations are added, employees will be notified via on-the-job training. The procedure for notifying the Facility Response Coordinator of a spill will be a part of annual refresher training.

9.4 Release Reporting

Depending on the type and size of spills or releases, it may be necessary to report the release to the local fire department, local emergency planning committee (LEPC), Ohio Environmental Protection Agency (Ohio EPA) and/or National Response Center (NRC). In the event of a spill/release requiring notification to the NRC, the spill or release should be reported within one hour of occurrence. Reporting is accomplished as follows.

- Immediately report any unplanned release to the supervisor or, contact the FRC until someone can be reached. The contact list is located in Appendix I, Table 1.
- The FRC, will evacuate in cases of imminent or actual harm, and in the event of a fire, will call the local fire department at 911.
- The FRC will evaluate the situation and implement the reporting procedures contained in the following sections. If determined that the facility has had a release, fire, or explosion which would threaten human health or the environmental outside the facility, immediate notice will be given to the Ohio EPA emergency response team at 1-800-282-9378 (or 614-224-0946 if the 1-800 number is not working) and the agencies listed below will be contacted. If a spill of a hazardous substance or oil occurs that exceeds its reportable quantity, the NRC will be contacted (24-Hour: 1-800-424-8802) within one hour. If it is determined that evacuation of local areas may be advisable, the following will be contacted:

**Covington Fire Department**
Emergency: 9-911

**Covington Police Department**
Emergency: 9-911

**Miami County Emergency Management Agency (EMA)**
24-Hour (937) 332-8562

**Heartland of Piqua**
24-Hour (937) 773-9346

**Metropolitan Environmental Services, Inc. (Emergency Spill Response Contractor)**
24-Hour (614) 771-1881
If it is determined that additional fire or police assistance from other areas is required, Covington’s Fire and Police Departments will be the primary emergency authority, while other departments will provide support as requested.

9.5 Restoring Affected Areas/Resumption of Operations

Immediately after an emergency, the Facility Response Coordinator shall arrange for proper disposal of any recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

The Facility Response Coordinator shall ensure that, in the affected area(s) of the facility:

- No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
- All emergency equipment listed in the Plan are cleaned and fit for their intended use before operations are resumed.
- If the facility stops operations in response to a fire, explosion, or release, the Facility Response Coordinator shall monitor for leaks, pressure build-up, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate. This will occur while operations are shut down and before operations are resumed.

10.0 AMENDING THE CONTINGENCY PLAN

Resource One will review and immediately amend the Plan, if necessary, whenever:

- Applicable rules are revised.
- The Plan fails in an emergency.
- The facility changes, in its design, construction, operation, maintenance, or other circumstances, in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency.
- The Facility Response Coordinators change.
- The emergency equipment changes.
- As required by the Ohio EPA.

Amendments will be fully implemented no later than 30 days after such change occurs.

Resource One will complete a review and evaluation of the Plan at least once every three years from the date that the original Plan is approved. Plan reviews and updates need to be recorded and kept with the plan.
RCRA CONTINGENCY PLAN

RESOURCE ONE COVINGTON
2000 MOTE DRIVE
COVINGTON, OHIO

CERTIFICATION

OPEA regulations for RCRA Contingency Plans, found at OAC 3745-65-51, require management approval and a written commitment of manpower, equipment, and materials required to control emergencies in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. This approval and commitment is provided below.

"Full approval of this RCRA Contingency Plan is extended by the management of the Resource One, Covington, Ohio Facility at a level of authority to commit the necessary resources for its implementation."

<table>
<thead>
<tr>
<th>Name (Type or Print)</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austin Brewer</td>
<td>Parts Destruction Manager</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Signature]</td>
<td>2-17-18</td>
</tr>
</tbody>
</table>
Resource One
2000 Mote Drive
Covington, Ohio 45318

Facility Closure Plan

February 22, 2018

Appendix H
Background, facility, and unit descriptions:

This document describes the plan that Resource One would follow at the cessation of automotive air bag processing at the facility in Covington, Ohio.

The automotive air bags are considered Hazardous Waste based on the characteristics of Ignitability (D001) and Reactivity (D003).

For the purpose of this plan, automotive air bags that have been rejected by automobile manufacturers are considered Hazardous Waste. These automotive air bags are considered “spent materials” and subject to be a solid waste (waste in the state of Ohio), and furthermore would exhibit the characteristic of ignitability (D001) and reactivity (D003).

The term “automotive air bags” includes all the following automotive safety device units and terms:

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

This plan describes the actions necessary to close the part of the facility at 2000 Mote Drive in Covington, Ohio that processes and stores the automotive air bags.

Resource One will install shredding systems at the Covington, Ohio. Each system will generate up to 700 gallons of process water per day. See below for details on wastewater management.

Basic Process Flow:

Owner/Operator name(s):

RBG, Inc. dba Resource-One
6043 Interstate Circle
Cincinnati, Ohio 45242

R-Two Holdings, LLC
362 East Loveland Avenue
Loveland, Ohio 45140
Automotive Air Bag Recycling — Waste Analysis Plan
February 22, 2018

Resource-One is a privately-owned company.

Address of the Resource One site that will process the Automotive Air Bags:
2000 Mote Drive
Covington, Ohio 45318

Latitude: 40° 06' 31.73” N
Longitude: 84° 20' 49.90” W

Telephone Number: 513-247-0175

Owner of RBG, Inc. and R-Two Holdings, LLC: Robert Groeschen

Resource One Responsible Officials:
COO: Todd Hormann
CFO: Kathy O’Brien

EPA Identification Number: Resource One EPA Identification number: OHR000200097

NAICS Code: 56211 — Waste Collection
The hazard associated with the automotive air bags is ammonium nitrate that is used in the inflator to cause the deployment of an air bag in a vehicle in the event of accident. Once, the units are deployed, or the ammonium nitrate is negated, the automotive air bags do not present any other environmental hazards.

As stated above, these automotive air bags will be processed in a shredder that includes an underwater chamber. The shredder units have a very tight or narrow gap between the tines on the shredder blades. This will ensure that each unit is sufficiently rendered inert by deployment in the shredding unit.

The deployment and removal of the hazard was confirmed by UN testing performed on 10/27 – 11/06/2017, with a final report on 11/7/2017. In addition, any ammonium nitrate that is not deactivated in the shredding process would be rendered inert in the water that is part of the shredding process.

The main purpose of this process at Resource One is to remove the hazard from the Automotive Air Bags and then recycle the shredded material.

Resource One commitment:

According to OAC 3745-55-11 Closure performance standard, Resource One is committed to closing the automotive air bag process to meet an un-restricted standard to ensure that:

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

Plan Description:

The automotive air bag processing (shredding) is isolated to specific areas within the facility. Due to the nature of the automotive air bags (solid parts), the storage doesn’t present any real risk of contamination of the facility or the environment.

Hazardous Waste inventory:

Prior to closing the shredding operations, Resource One will shred all automotive air bags currently stored within the facility. There will be no un-processed automotive air bags left at the site prior to the shutdown of the shredding process.

Normal Processing quantities:

Daily average: 13,000 automotive air bags per day  
Daily maximum: 15,600 automotive air bags per day

Storage quantities:

- Maximum on-site storage of Automotive Air Bags (whole units) – six (6) trailers (107,172 pounds).  
- Maximum on-site storage of Inflators (ATF regulated) – five (5) trailers (magazines) (169,000 pounds).

Other waste (maximum amounts):

Each automotive air bag is packaged in a cardboard box that contains a small piece of plastic foam, a wire harness and small metal brackets. Based on the storage amounts listed above, this will result in a maximum amount of the following on-site:

Cardboard: 39,500 lbs  
Plastic foam: 1,950 lbs  
Wire harness: 9,750 lbs  
Metal brackets: 7,800 lbs

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

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

See below for wastewater testing plan.
Resource One Maps:

Aerial map:
Site location and topography map:

SITE LOCATION MAP
Wastewater Testing Plan.

During the initial start-up phase, any wastewater that results from the use of the shredding equipment will be collected in totes. After collection of the wastewater, Resource One will test the water to complete a profile. The end goal is to install a sanitary line to discharge the wastewater to the Village of Covington, Ohio. Resource One has been working with Mike Busse from The Village of Covington and an engineering firm to address a sanitary tap-in. If the discharge requires an indirect discharge permit, Resource One has already been in contact with Matt Walbridge from Ohio EPA SWDO for a possible discharge permit. Additionally, if any treatment on-site is required prior to discharge, Resource One has been in contact with Bob Ostendorf from Ohio EPA SWDO to address the need for a PTI for the installation of any treatment equipment.

This is all contingent on the results of the sampling after the shredding is commenced. The primary chemical of concern is ammonium nitrate.
The entire shredding process will be contained within the building at 2000 Mote Dr. in Covington, Ohio. This includes the shredder, water, conveyors, and the final container for the shredded material. There will be no exposure to the environment.

After the initial wastewater is profiled, Resource One staff will evaluate the wastewater annually to determine if any changes have occurred.

During the initial start-up phase, the wastewater will be checked daily as part of the operational checks. Operators will check the wastewater for any unusual conditions such as:

- Odor;
- Discoloration;
- Oils and grease;
- Cloudiness;
- Coolness or heat generated (endo or exothermic).

If Resource One can discharge to The Village of Covington, Ohio, the inspections of the wastewater containers would end. At that time, Resource One would comply with any applicable The Village of Covington sewer use by-laws or Ohio EPA indirect discharge requirements.

If Resource One is still collecting wastewater in totes at the time of closure, all wastewater will be analyzed and profiled through an appropriate wastewater treatment company. All wastewater will be sent off-site for treatment including any waters associated with cleaning at the facility.

The wastewater will be tested for TCLP organics and metals and flashpoint. Resource One will check the pH on-site. The TCLP testing will not include halogenated solvents or pesticides. Neither of these are used or involved in the process. Resource One will have the samples collected by an independent third-part laboratory.

The processing (shredding) units for the automotive airbags:

The following actions will be taken to ensure that no contamination remains in the area where the automotive air bags were stored or processed:

1. All wastewater from the shredding operations will be removed.
2. All wastewater will be evaluated and profiled and sent off-site to an approved wastewater treatment facility.
3. The shredders and ancillary equipment will be cleaned thoroughly. Any waste resulting from the cleaning will be evaluated, profiled, and disposed of properly.
4. The area around the shredding process will be cleaned thoroughly. Any waste resulting from the cleaning will be evaluated, profiled, and disposed of properly.
5. All cardboard, plastic or paper will be collected and sent off-site for recycling.
6. All shredded metal will be shipped off-site to the metal recycling facility.

The shredding equipment and surrounding area including floors and a small trench will undergo cleaning with a high-power pressure washer. All wastewater will be collected and tested as part of the testing addressed above. After the test results are received, Resource One will properly characterize the wastewater.

The actual automotive air bags do not have any residual oils or other contaminants on them.
Inspections:

Resource One staff will inspect all areas where automotive air bags were stored or processed.

Shredding area and air bag storage area(s):

After the area is thoroughly cleaned, an inspection will take place looking at the following items:

1) All waste has been properly removed.
2) All floors and walls are free of contamination.
3) The shredding units and ancillary equipment are clean and free of contamination.
4) All storage areas are clean and free of contamination.

Resource One staff will document this inspection and take pictures of each area.

Recordkeeping:

Resource One will maintain records of the following:

- Closure notice to Ohio EPA.
- Documentation describing the closure activities.
- Inspections of each area.
- Photographs of each area.
- Records of any waste profiles.
- Records of any shipments of waste sent off-site.
- Final summary report to Ohio EPA.

Schedule:

<table>
<thead>
<tr>
<th>No.</th>
<th>Action description</th>
<th>Month 1</th>
<th>Month 2</th>
<th>Month 3</th>
<th>Month 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Process all remaining automotive air bags at the facility and ship the recycled metal off-site.</td>
<td>O--O</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Notify Ohio EPA of the intent to close the shredding process for automotive air bags.</td>
<td>O</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Profile and evaluate all wastewater involved in the shredding process.</td>
<td>O</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Ship all wastewater off-site to the proper disposal facility.</td>
<td>O</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Clean the shredders, ancillary equipment, and surrounding area thoroughly.</td>
<td>O--O</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Evaluate, profile, and dispose of any waste from the cleaning of the shredders and ancillary equipment.</td>
<td>O--O</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>--------------------------------------------------------------------------------------------------</td>
<td>-----</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Collect all cardboard, plastic and metal and ship off-site for recycling.</td>
<td>O</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Inspect and photograph all areas where automotive airbags were stored and processed.</td>
<td>O</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Prepare a final summary report and submit to Ohio EPA.</td>
<td>O--O</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Facility Closure Plan Approval**

<table>
<thead>
<tr>
<th>Name (Type or Print)</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Todd Hermann</td>
<td>Chief Operating Officer</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>02/22/18</td>
</tr>
</tbody>
</table>
## APPENDIX I

**FACILITY RESPONSE COORDINATORS**
(Pollution Prevention Team)

Table 1: Emergency Contact List

<table>
<thead>
<tr>
<th>Call Order</th>
<th>Title</th>
<th>Coordinator Identifier</th>
<th>Name</th>
<th>Telephone</th>
</tr>
</thead>
</table>
| 1          | Supervisor        | Primary Response Coordinator   | James Ker          | Office: 937-539-0610  
Cell: 937-424-7221 |
| 2          | Manager           | Secondary Response Coordinator | Austin Brewer      | Office: 937-539-0610  
Cell: 937-407-0318 |
| N/A        | Contracted Spill Responder | Spill Response Contractor | Metropolitan Environmental Services, Inc. | 24-Hour 614-771-1881 |
Resource One - Hazardous Waste Emergency Layout

2000 Mote Drive
Covington, Ohio 45318

<table>
<thead>
<tr>
<th>Waste Name</th>
<th>EPA Codes</th>
<th>Hazards of waste</th>
<th>Maximum Amount On-site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automotive Air Bags &amp; Inflators</td>
<td>D001, D003</td>
<td>Reactive and harmful if inhaled or absorbed through the skin. Causes harmful irritation to the skin, eyes, and respiratory tract.</td>
<td>276, 172 lbs</td>
</tr>
</tbody>
</table>

Fire Department: Call 911 or 937-473-2101
Emergency Coordinator: James Ker @ 937-424-7221

2/2018
Resource One
2000 Mote Drive
Covington, Ohio 45318

Cost Estimate for Post-Closure Care

February 19, 2018

Appendix L
Facility Information Summary

Date: February 19, 2018

I. GENERAL INFORMATION:

Facility Name: Resource One

Owner/Operator name(s):

RBG, Inc. dba Resource-One  R-Two Holdings, LLC
6043 Interstate Circle  362 East Loveland Avenue
Cincinnati, Ohio 45242  Loveland, Ohio 45140

Resource-One is a privately-owned company.

II. FACILITY INFORMATION:

Type of Hazardous Waste facility: Ohio EPA exempted Automotive Air Bag Recycling Facility.

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

III. REASON FOR POST-CLOSURE COST ESTIMATE:

☐ New Facility  Ohio EPA Facility ID #: OHR000200097

☐ Existing Facility

☐ Annual Update

☐ Modification

☐ Alteration

☐ Other

IV. BASIS FOR ESTIMATE

What is the basis for the cost estimate: Maximum waste on-site – disposal costs & transportation, industrial cleaning costs, sampling costs, wastewater disposal costs including transportation and consultant/engineering fees. Fees are based on costs from waste disposal companies, laboratory costs, transportation costs and consultant/engineering costs.

Identify the third-party providing the post closure estimates: Total Compliance LLC
5859 Morganwood Sq.
Hilliard, Ohio 43026
614-554-0343
## Closure Cost Estimate Sheet

### I Waste Disposal Costs

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Total Item Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>a Disposal of maximum on-site Automotive Air Bags (modules) (D001, D003). General Dynamics-OTS Munition Services 4174 Co Rd 180, Carthage MO 64836</td>
<td>107,172 lbs</td>
<td>$3.50/lb</td>
<td>$375,102</td>
</tr>
<tr>
<td>b Disposal of maximum on-site Automotive Air Bags Inflators – ATF regulated. (D001, D003). General Dynamics-OTS Munition Services 4174 Co Rd 180, Carthage MO 64836</td>
<td>169,000 lbs</td>
<td>$1.00/lb</td>
<td>$169,000</td>
</tr>
<tr>
<td>c Costs to transport Automotive Air Bags (D001, D003) to G.D. in Carthage MO. 8 trips.</td>
<td>5,120 miles</td>
<td>$4.69/mile</td>
<td>$24,012.80</td>
</tr>
<tr>
<td>d Disposal of wastewater from shredding machines, wastewater from clean-up of shredders, conveyors and containment pit.</td>
<td>6,500 gal</td>
<td>$0.32</td>
<td>$2,080</td>
</tr>
<tr>
<td>e Landfill costs for disposal of general trash.</td>
<td>1,500 lbs</td>
<td>$0.045/lb</td>
<td>$67.50</td>
</tr>
<tr>
<td>f Transportation of landfill waste to Miami County Transfer facility.</td>
<td>1 trip</td>
<td>$78</td>
<td>$78</td>
</tr>
<tr>
<td>g Send shredded metal to metal recycling facility. One 30-yard roll-off.</td>
<td>1 trip</td>
<td>$194</td>
<td>$194</td>
</tr>
</tbody>
</table>

**Total – Waste Disposal Costs** $570,534.30

*Disposal costs are based on General Dynamics ($1.00/lb for inflators & $3.50/lb for modules).*

### II Analytical Costs

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Total Item Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>a Analytical for wastewater to profile for disposal. 3 samples. Flash point &amp; TCLP (metals &amp; volatile organics only). Includes cost to collect samples.</td>
<td>3</td>
<td>$2,900</td>
<td>$7,200</td>
</tr>
</tbody>
</table>

**Total – Analytical Costs** $7,200
### Consultant/Engineering Services

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Total Item Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>a Develop profile for automotive air bag disposal with General Dynamics, in New Tripoli, PA.</td>
<td>4 hrs</td>
<td>$125/hr</td>
<td>$500</td>
</tr>
<tr>
<td>b Contract labor to cleanup waste and load airbags onto transport vehicles.</td>
<td>40 hrs</td>
<td>$30/hr</td>
<td>$1,200</td>
</tr>
<tr>
<td>c Forklift rental.</td>
<td>2 days</td>
<td>$175/day</td>
<td>$350</td>
</tr>
<tr>
<td>d Evaluate lab data and complete waste profile for wastewater disposal.</td>
<td>4 hrs</td>
<td>$125/hr</td>
<td>$500</td>
</tr>
<tr>
<td>e Contract industrial cleaning company to power-wash shredding equipment and containment area.</td>
<td>60 hrs</td>
<td>$115/hr</td>
<td>$6,900</td>
</tr>
<tr>
<td>f Cost for industrial cleaning company vacuum truck.</td>
<td>3 days</td>
<td>$2,250/day</td>
<td>$6,750</td>
</tr>
<tr>
<td>g Coordinate disposal of automotive air bags, wastewater, general trash and shredded metal. This includes filling out shipping papers and marking &amp; labeling of all containers.</td>
<td>28 hrs</td>
<td>$125/hr</td>
<td>$3,500</td>
</tr>
<tr>
<td>h Consultant/Engineering overall management costs to manage project, including inspections and reporting to Ohio EPA.</td>
<td>164 hrs</td>
<td>$125/hr</td>
<td>$20,500</td>
</tr>
<tr>
<td><strong>Total – Consultant/Engineering Services</strong></td>
<td></td>
<td></td>
<td><strong>$40,200</strong></td>
</tr>
</tbody>
</table>

**Summary of costs:**

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>Total – Waste Disposal Costs</td>
<td>$570,534.30</td>
</tr>
<tr>
<td>II</td>
<td>Total – Analytical Costs</td>
<td>$7,200</td>
</tr>
<tr>
<td>II</td>
<td>Total – Consultant/Engineering Services</td>
<td>$40,200</td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td></td>
<td><strong>$617,934.30</strong></td>
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</tbody>
</table>
# Resource One – Post Closure Cost Estimate Approval

<table>
<thead>
<tr>
<th>Name (Type or Print)</th>
<th>Title</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rob Crossley</td>
<td>Vice President</td>
<td></td>
<td>2/19/18</td>
</tr>
</tbody>
</table>
This procedure describes how Resource One will recycle automotive safety devices received at the Covington, Ohio facility. This procedure will address our process and all regulatory requirements to safely process all automotive safety devices. All safety devices will be destroyed onsite by an underwater shredding system.
AUTOMOTIVE SAFETY DEVICE RECYCLING FLOWCHART

Automotive Safety Devices for recycling sent to Covington, Ohio Facility.

Resource One evaluates the Safety Device to ensure that it fits within existing procedures (safety issues, etc.)

Appropriate for recycling program?

Yes

Resource One classifies type of Safety Device.

Does the Safety Device require scanning?

Yes

Scan Safety Device box to confirm Resource One possession.

No

Find an alternative destruction/disposal method.

Resource One separates all components for recycling.

Resource One provides documentation to the customer verifying destruction.

All inflators that do not get shredded during business hours will be secured in ATF storage magazine overnight.

Transport all shredded material to metal recycling facility to be separated and recycled.

Underwater Shredder destroys Inflator / Module and drops material into container.

Appropriate for recycling program?

No

Load Inflator / Module onto conveyor leading to underwater shredding process.

Waste to Energy Facility

Cardboard Recycling or Reuse Facility

Wire Harness Recycling Facility

Metal Recycling Facility

AUTOMOTIVE SAFETY DEVICE RECYCLING FLOWCHART

02/08/2018 Revision #5
Processor 1 will be only employee requiring PPE during unpacking and handling of the module/inflator.
**Resource One Required Safety Equipment**

### Safety Equipment:
1. Eye Wash Station;
2. Fire Extinguisher;
3. Keep steel door shut;
4. Keep work table grounded; and
5. Keep magazine and conveyors grounded

#### Safety Inspection Sheet

**Resource One**

Auto Safety Device Recycle Area

Weekly Inspection Sheet

<table>
<thead>
<tr>
<th>Item</th>
<th>Requirement</th>
<th>Compliant</th>
<th>For any ‘NO’ action taken</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Personal Protective Equipment (PPE)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1 Safety glasses worn when handling safety device?</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>1.2 Face shield worn when handling safety device?</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>1.3 Cut resistance gloves worn when handling safety device?</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>1.4 Cut resistance sleeves worn when handling safety device?</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>1.5 Chains and hooks locked up when handling safety device?</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>1.6 Fire extinguisher easily accessible and maintained?</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Key Safety Equipment</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.1 Steel door closed during recycle process?</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>2.2 Steel door closed during recycle process?</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>2.3 Keeping work table grounded?</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>2.4 Processing conveyer grounded?</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>2.5 Keeping magazine grounded?</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

#### Notes:

- Eye Wash Station (Maintain fluids and keep clean)
- Work Table Grounding (Inspected weekly and grounded at all times)
- Storage Trailer / Magazine Grounding (Inspected weekly and grounded at all times)
- Fire Extinguisher & Shut Steel Door (Inspected weekly and door closed during processing)
Resource One Product Security

If required, Resource One employee scans the box of each Safety Device before dis-assembly. Employee checks to verify the scanning matches the Customer's report of units sent to Resource One. If the report does not match, the employee will stop and contact the Customer to reconcile the discrepancy.
## Safety Device Recycle Procedure at Resource One

<table>
<thead>
<tr>
<th>Step</th>
<th>Action</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>If required by customer, scan box to confirm with customer</td>
<td>Scanner</td>
</tr>
<tr>
<td>2</td>
<td>Take box from pallet and open</td>
<td>Processor 1</td>
</tr>
<tr>
<td>3</td>
<td>Remove module/ inflator and place on shred conveyor</td>
<td>Processor 1</td>
</tr>
<tr>
<td>4</td>
<td>Separate other components and box into waste to energy containers</td>
<td>Processor 2</td>
</tr>
<tr>
<td>5</td>
<td>Unloading pallet to scanner and moving boxes to Processor and removing full containers of waste to energy.</td>
<td>Forklift Operator</td>
</tr>
</tbody>
</table>
Separation of materials for Recycling

Resource One employee places metal parts into designated container.

Resource One employee places wire harness into designated container.

Resource One employee places all cardboard into designated container.

Resource One employee places remaining materials into Waste to Energy container.
ATF Storage Requirements

The Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) regulates each individual inflator when it is not assembled into a safety device module. Therefore, Resource One was required by law to apply for an Explosives permit. Resource One storage has been approved by ATF and Ohio State Fire Marshal.

If an individual inflator, ATF regulations are in effect. ALL Inflators must be stored in an ATF approved magazine and securely locked when not being processed. An ATF specified documentation process must be followed.
Shredding Process at Resource One

Resource One will utilize an underwater shredding system to ensure the highest level of safety and efficiency of processing. This system will allow for extreme reduction of safety concerns, while minimizing risks for Resource One employees. Submerging the shredder in water will contain any bursts during the shredding process while allowing for complete destruction of explosive material.

The system will include a conveyor belt that will continuously feed the shredder in an efficient and timely manner. An input conveyor will travel from the processing area to Underwater Shredder. A second output conveyor belt will then place shredded material in roll-off container for easy transportation. Conveyors and shredder will be grounded.
<table>
<thead>
<tr>
<th>Date</th>
<th>Document Name</th>
<th>Author</th>
<th>Revision History</th>
</tr>
</thead>
<tbody>
<tr>
<td>3/4/2018</td>
<td>Automotive Safety Device Dis-Assembly and Recycling</td>
<td>Chris Heminger</td>
<td>Added Steps to damage the pins used for the electrical connection and location of the pink paint.</td>
</tr>
<tr>
<td>1/11/2016</td>
<td>Automotive Safety Device Dis-Assembly and Recycling</td>
<td>Chris Heminger</td>
<td>Added retention time period for pictures and process time of units upon receipt.</td>
</tr>
<tr>
<td>9/29/2017</td>
<td>Automotive Safety Device Dis-Assembly and Recycling</td>
<td>Casal Lobaugh</td>
<td>Procedure updated to include who is required to wear PPE. Updated Safety Equipment to include grounding conveyors and magazine. Official shredder diagram added.</td>
</tr>
<tr>
<td>2/08/2018</td>
<td>Automotive Safety Device Recycling and Shredding Process</td>
<td>Marcia Burney</td>
<td></td>
</tr>
</tbody>
</table>

Resource One Approvals

Todd Hornmann  02/08/2018  James Koe
Austin Brewer  02/13/18
Hi Chris,

We would exempt you from that specific condition in the exemption order. However, we would ask that Resource-one reach out to the local fire department and receive concurrence that this would be acceptable. For some guidance on this issue, here is language from EPA’s generator improvement rule:

Special conditions for accumulation of ignitable and reactive wastes. (A) Containers holding ignitable or reactive waste must be located at least 15 meters (50 feet) from the facility’s property line unless a written approval is obtained from the authority having jurisdiction over the local fire code allowing hazardous waste accumulation to occur within this restricted area. A record of the written approval must be maintained as long as ignitable or reactive hazardous waste is accumulated in this area.

Also, as an example, here is a link to an exemption order for the same condition we issued to a permitted facility.

Let me know if you have any questions.

Thanks,

Mitch

Mitch Mathews, Manager
Compliance Assurance Section – Hazardous Waste Program
Division of Environmental Revitalization and Response
Ohio EPA
614-644-2953
Mitchell.mathews@epa.ohio.gov
# Resource One
## Automotive Safety Device Recycling
### Daily Inspection Sheet

**Date of Inspection:**

**Inspector's Name:**

**Inspector's Signature:**

<table>
<thead>
<tr>
<th>Item</th>
<th>Requirement</th>
<th>Compliant</th>
<th>Document any 'NO' action taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>Processing work tables grounded?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>1.2</td>
<td>Processing conveyor grounded?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>1.3</td>
<td>Ancillary equipment guards on and in place?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>1.4</td>
<td>PPE available and in place?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>1.5</td>
<td>Spill response equipment available and in place?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>1.6</td>
<td>Emergency Response communication methods available?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>1.7</td>
<td>Emergency response postings in place and up-to-date?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>1.8</td>
<td>Fire extinguishers in place and maintained?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>1.9</td>
<td>Security system and cameras operational?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>2.0</td>
<td>Doors and access to the building secured?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>2.1</td>
<td>Safety device storage containers free of severe damage or neglect?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>2.2</td>
<td>Safety device storage area free of open flames or sparking equipment (within 25 feet)?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>2.3</td>
<td>Scrap recycling containers in good condition and free of leaks?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>2.4</td>
<td>Equipment and containers containing wastewater in good condition and free of leaks?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>2.5</td>
<td>Check wastewater for significant odor, discoloration, oils &amp; grease, cloudiness &amp; temperature. Ok?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>2.6</td>
<td>Containment for shredding - condition okay?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>2.7</td>
<td>Isle space maintained around the safety device storage areas?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>2.8</td>
<td>Outside areas free of any product/material exposure or unusual conditions?</td>
<td>Yes No</td>
<td></td>
</tr>
</tbody>
</table>

**Notes/Comments:**

---

Revision A
Appendix L
2/19/2018