CERTIFIED MAIL

April 24, 2008

Re: Modified Director's Final Findings & Orders
GE Lighting, Inc.
US EPA ID No.: OHD 066 052 804

Mr. John Fish
Vice President Manufacturing
GE Lighting, Inc.
1210 North Park Avenue
Warren, Ohio 44483

Dear Mr. Fish:

Here are the Modified Director's Final Findings and Orders (Orders) issued to GE Lighting, Inc. on April 24, 2008. These Orders are effective today.

If you have any questions concerning compliance with these Orders, do not hesitate to contact Natalie Oryshkewych at (330) 963-1267.

Sincerely,

[Signature]
David A. Sholtis
Assistant Chief
Division of Hazardous Waste Management

Attachments

cc: Michael A. Savage, Chief, DHWM
   Harry Sarvis, Mgr., CAS, DHWM
   Elissa Miller, Legal
   Heidi Griesmer, PIC
   Natalie Oryshkewych, Mgr., DHWM, NEDO
   Bonnie Harrington, Esq., Senior Counsel, Environment, Health & Safety
BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

GE Lighting, Inc.
1210 N Park Ave
Warren, Ohio 44483

Respondent

Director's Final
Findings and Orders

MODIFICATION OF DIRECTOR’S FINAL FINDINGS AND ORDERS OF
FEBRUARY 22, 2008

PREAMBLE

It is agreed by the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders (Orders) are issued to GE Lighting, Inc. (Respondent) pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency (Ohio EPA) under Ohio Revised Code (ORC) §§ 3734.13 and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and successors in interest liable under Ohio law. No change in ownership of Respondent or of the Facility shall in any way alter Respondent’s obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as in the Director's Final Findings and Orders of February 22, 2008 and ORC Chapter 3734, and the rules promulgated thereunder.
IV. FINDINGS

The Director of Ohio EPA has determined the following findings:

1. On February 22, 2008, the Director issued Final Findings and Orders to Respondent. All findings made in the February 22, 2008 Director's Final Findings and Orders are hereby incorporated by reference.

2. The Director's Final Findings and Orders of February 22, 2008 required Respondent to, as a supplemental environmental project and in lieu of payment of $1,165 of the civil penalty, implement the "Ohio Lamp Chrome Reduction/Elimination Project." Order No. 1.d. of the February 22, 2008 Director's Final Findings and Orders required Respondent to take two samples of the wastewater treatment sludge each week for a period of six consecutive weeks commencing the week of November 19, 2007 and take two samples each week for a period of four additional weeks commencing the week of January 28, 2008.

4. Respondent, in a telephone call dated February 19, 2008 and via electronic mail dated February 27, 2008, notified Ohio EPA that it had observed some variability in the sampling results of the wastewater treatment sludge. To address this variability, Respondent requested that it be given an additional period of six weeks of sampling and sampling analysis commencing the week of February 25, 2008.

V. ORDERS

Respondent shall achieve compliance with Chapter 3734. of the ORC and the regulations promulgated thereunder according to the following compliance schedule:

All terms and conditions contained in the February 22, 2008 Director's Final Findings and Orders remain valid and in effect with the exception of Section V., paragraphs 1.d. and 1.e. which are superseded by the following:

d. In lieu of payment of the remaining $1,165.00 of the civil penalty settlement, Respondent shall implement the Ohio Lamp Chrome Reduction/Elimination Project SEP referenced in Finding No. 10. of these Orders. As part of the implementation of the Ohio Lamp Chrome Reduction/Elimination Project SEP, Respondent shall take two samples of the wastewater treatment sludge each week for a period of six consecutive weeks commencing the week of November 19, 2007. Respondent shall take two samples of the wastewater treatment sludge each week for a period of four additional weeks.
commencing the week of January 28, 2008. Finally, Respondent
shall take two samples of the wastewater treatment sludge each week
for a period of six weeks commencing the week of February 25, 2008.
All sample results and supporting documentation shall be submitted
to Ohio EPA for review and approval within 14 days after receipt of
the results from the final sampling event. The sample results and
supporting documentation shall demonstrate that the wastewater
treatment sludge is not a characteristic hazardous waste.

e. Should Respondent fail to conduct the sampling as described in
Order No. 1.d. or should any of the samples of the wastewater
treatment sludge demonstrate that the wastewater treatment sludge
is a characteristic hazardous waste, Respondent shall pay to Ohio
EPA the amount of $1,165.00 within 7 days of failing to conduct the
sampling as described in Order No.1.d. or within 14 days of receiving
a sample result demonstrating that the wastewater treatment sludge
is a characteristic hazardous waste. Payment shall be made in
accordance with the procedures established in Order No. 1.a. of these
Orders. A copy of each check shall be submitted in accordance with
Section X. of these Orders.

VI. TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent
certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has
performed all obligations under these Orders and Ohio EPA's Division of Hazardous Waste
Management 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 Respondent
of the obligations that have not been performed, in which case Respondent 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 Respondent to Ohio EPA and shall be signed
by a responsible official of Respondent. For purposes of these Orders, a responsible
official is a corporate officer who is in charge of a principal business function of
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 Respondent's 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 Respondent.

IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. NOTICE

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

Ohio Environmental Protection Agency
Northeast District Office
Division of Hazardous Waste Management
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
Attn: DHWM Manager

and Ohio EPA Central Office at the following address:

For mailings, use the post office box number:

Chris Korleski
Ohio Environmental Protection Agency
Lazarus Government Center
Division of Hazardous Waste Management
P.O. Box 1049
Columbus, Ohio 43216-1049
Attn: Manager, Compliance Assurance Section
XI. RESERVATION OF RIGHTS

Ohio EPA reserves its rights to exercise its lawful authority to require Respondent to perform closure as well as corrective action at the Facility at some time in the future, pursuant to ORC Chapter 3734. or any other applicable law. Respondent reserves its rights to raise any administrative, legal or equitable claim or defense with respect to any final action of the Director regarding such closure or corrective action. Ohio EPA and Respondent each reserve all other rights, privileges and causes of action, except as specifically waived in Section XII. of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Except for the rights to seek closure of hazardous waste units and corrective action at the Facility, which rights Ohio EPA does not waive, compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

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

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent 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 SO ORDERED AND AGREED:

Ohio Environmental Protection Agency

[Signature]
Chris Korleski
Director

Date 4/14/08

IT IS SO AGREED:

GE Lighting, Inc.

[Signature]
Signature

Printed or Typed Name
John Fish

Title VP Supply Chain

Date 3/7/08