



# LightRecycle Washington 2021 Annual Report

**For submission to:**

Washington State Department of Ecology  
Solid Waste Management Program  
Attn: Al Salvi, Lindsey Ladd

**Submitted by:**

Mark Kurschner, President  
PCA Product Stewardship Inc.  
P.O. Box 30811  
Seattle, WA 98103

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## 1 Executive Summary

The Washington State Mercury-Containing Lights Product Stewardship Program, called LightRecycle Washington (the “Program” or “LRW”), began on January 1, 2015, for the collection and recycling of mercury-containing lights sold at retail.

Washington State residents and businesses can recycle up to 10 mercury-containing lights per day for free, by dropping them off at authorized collection sites throughout the State. Collection sites are required in every county and every city of 10,000 or more people. LRW continues to meet this requirement through its established collection network of over 200 registered sites, and by holding collection events in areas where no permanent collection site exists. Collectors include retailers, municipal waste facilities, and residential curbside collection.

Collected lights are transported to the Program processor (recycler) using ground transport, where they are recycled as Universal Waste. Recovered mercury is retorted, then reused or stored, and is managed by the processor in compliance with applicable local, state, and federal laws. Recycling mercury-containing lights protects the environment and human health by reducing the release of mercury into the environment and by recovering recyclables, such as metals and glass.

The total amount of program mercury containing lamps collected in 2021 was 551,673 lbs., estimated to be 1,140,770 units. This volume represents approximately 91.9% of the annual collection target of 1,240,967 units, as committed to in the Program Plan Update submitted on December 23, 2021 and approved by the Department of Ecology on January 10, 2022.

Collection sites and retailers were sent printed marketing materials on request.

The Program is funded through an Environmental Handling Charge (EHC) added to the purchase price of each mercury-containing light sold at retail in or into Washington State. The current EHC is \$0.95 per unit for all program types. The Program is administered by PCA Product Stewardship (PCA), a 501(c)(3) non-profit organization. Greater details about the Program are contained in the report below.

## 2 Program Description

The Program has been developed pursuant to the provisions of Chapter 70A.505 of the Revised Code of Washington ([Chapter 70A.505 RCW](#)) “Mercury-containing lights-proper disposal” (the “Law”). This Plan complies with the requirements of the “Rule” prescribed in (Chapter 173-910 Washington Administrative Code ([Chapter 173-910 WAC](#))) where there is no conflict with the requirements of Chapter 70.275 RCW.

The Law requires that the Program be funded through an EHC added to the purchase price of each mercury-containing light sold at retail in or into Washington State as of the program start date, January 1, 2015. The EHC was \$0.25 per unit for all program product types from the start of the program until June 30, 2017. On July 1, 2017, the EHC was increased to \$0.50 per unit for all program product types. On February 1, 2018, the EHC was increased to \$0.95 per unit for all program types. Each change in EHC was approved by the Department of Ecology.

Every Producer of mercury-containing lights sold in or into Washington State for retail sale must participate in a product stewardship program for those products. Participation in LRW is open to all Producers.

A network of collection sites has been established throughout Washington State that includes retailers, municipal waste facilities, collection events, and residential curbside collection. Washington State residents and businesses can recycle up to 10 mercury-containing lights per day for free, by dropping them off at authorized collection sites throughout the State.

Collected lights are transported to the Program processor (recycler) using ground transport, where they are recycled as Universal Waste. Recovered mercury is retorted, then reused or stored, and is managed by the processor in compliance with applicable local, state, and federal laws.

LRW is administered by PCA, a 501(c)(3) non-profit organization.

### 3 Participating Producers

PCA Product Stewardship Inc. (PCA) has been designated as the Stewardship Organization for LRW. PCA administers the Program on behalf of all participating Producers who sell mercury-containing lamps in or into Washington State.

PCA is a not-for-profit product stewardship organization incorporated in Oregon and registered in Washington (UBI number 603 226 459).

The participating Producers in LRW are listed in Appendix A, along with their contact information and the associated brands they sell.

The total number of mercury-containing lights sold at retail in or into the state by participating Producers in 2021, as reported by Program Producers and remitting retailers, is provided in Table 1 below, by product category.

Table 1: Mercury-lights Sold at Retail in WA in 2021

Product Category	2021 Units Sold
Compact Fluorescent Lamps (CFL)	216,619
Fluorescent Tubes (All lengths and Shapes)	604,180
High Intensity Discharge (HID)	29,787
Total	850,586

The total number of mercury-containing lights sold at retail in or into the state by participating Producers in 2020 was 1,378,044, so the 2021 sales represent an 38.3% decline in sales. This decline is attributed mainly to the transition to other lighting technologies, such as Light Emitting Diodes (LEDs), especially prominent in the CFL category.

#### 4 Program Goals

To estimate the number of Program Products to be collected in 2021, PCA used the average of the collected units from 2019 and 2020 (as reported in the 2019 and 2020 LightRecycle Washington Annual Reports respectively), as a baseline. As outlined in the Program Plan Update dated December 23, 2021, PCA established a collection goal of increasing collection by 2% in 2021 from the 2019-2020 average. Table 2 below outlines the revised collection targets from 2021-2025.

Table 2: 2020-2025 Collection Targets

Targets	2019-2020 Averaged	2021	2022	2023	2024	Jan-Jun 2025 <sup>1</sup>
Units Collected	1,216,635	1,240,967	1,265,787	1,278,444	1,291,229	645,614
Annual Collection Increase		2%	2%	1%	1%	0%

The amount of materials collected at registered collection sites and received by the Program processor in 2021 was 556,672 lbs. This weight includes any non-program materials that may have entered the collection system, however, does not include lamps from Puget Sound Energy (PSE), who continue to operate an independent network of collection sites for CFLs and incandescent lights.

<sup>1</sup> The program sunset date is July 1, 2025, and as such, the collection target for the year 2025 is half of the estimated annual volume

Upon receipt at the processor, each shipment is weighed. Weights are recorded separately for fluorescent tubes and mixed lamps, which are comprised of CFLs, HIDs and curved fluorescent tubes. Mixed lamps are sampled to determine the split of Program materials for those types. Weights of individual lamps were used to derive the number of units collected.

The total amount of program materials not including non-program collected in 2021 was estimated at 551,673 lbs., which converts to 1,140,770 units, representing approximately 91.9% of the annual collection target of 1,240,967 units. A breakdown of the materials collected in 2021 is provided in Table 3 and the graphic below:

Table 3: Program Materials Collected and Processed in 2021

Lamp Type	Weight Collected (lbs.)	Weight per Unit (lbs.) <sup>2</sup>	Units Collected
Fluorescent Tubes - 4' Straight	349,919	0.5	699,838
Fluorescent Tubes - 8' Straight	114,8662	1	114,862
Fluorescent Tubes - Curved Shapes	13,303	0.25	53,211
CFLs (Compact Fluorescent Lamps)	67,140	0.25	268,559
HIDs (High Intensity Discharge)	6450	1.5	4,300
Total <sup>3</sup>	551,673		1,140,770
2020 Annual Target			1,240,967
Percentage of Goal			<b>91.9%</b>

## 5 Collection System

### Collection Sites

By law, collection sites are required in every county and every city of 10,000 or more people. LRW met this requirement by establishing a collection network registered sites that collected all program products and held collection events in areas where no permanent collection site could be placed or advertising the location of near-by collection sites. Due to the pandemic, Ecology waived these compliance requirements.

At the end of 2021, LRW had a total of 279 registered collection sites, including:

- 185 sites that accept all program products
- 66 sites that accept CFLs only
- 28 additional sites that are unadvertised, that accept all program products

<sup>2</sup> Conversion rates used as outlined in the 2021 Program Plan Update, as approved by the Department of Ecology

<sup>3</sup> Total does not add up due to rounding

Only collection sites that are advertised and accept all program products meet the collection site requirements in the law. See Appendix C for a complete list of advertised collection sites by city and county.

Unadvertised sites include:

- Sites that accumulate lights, but do not collect lights directly from residents or do not want to promote the collection of lights.
- Curbside collectors whose facilities are not suitable for public drop-off of lights for recycling.

Mercury-containing lights were collected at events that were held around the state that were either initiated or supported by the Program:

- King County Wastemobile
  - 12 locations, 63 days
  - 29,851 lbs. collected

### **Curbside Collectors**

One waste hauler that have curbside collection programs for mercury-containing lights are registered as LRW collectors. The names of the waste haulers and location of their corporate headquarters are:

- Recology/CleanScapes, Issaquah, WA

## **6 Processor**

### **Name and Contact Information**

EcoLights Northwest, LLC (“EcoLights”)  
Contact: Alex Domingo  
7021 South 220th Street,  
Kent, Washington 98032  
Phone: 206.388.5330

### **Total Mercury-containing Lights Processed**

LRW collected 551,673 lbs. of program mercury-containing lights, all of which were processed by EcoLights.

### **Description of Processing Methods**

**Fluorescent Tubes:** Fluorescent tubes are fed into a machine utilizing a controlled

environment where the tubes are mechanically crushed and separated into the following components:

- Glass cullet
- Aluminum end caps
- Mercury phosphor powder

The glass cullet is sent to a Washington aggregate company for use in the manufacture of concrete. The aluminum endcaps are sold in Washington or Oregon as scrap metal, and the mercury phosphor powder is shipped to an EPA regulated and approved mercury retort company in Indiana, where the mercury is removed from the powder and made available for future use in new products or processes such as the manufacture of fluorescent lamps. The clean phosphor powder is shipped for recovery of rare earth elements contained in the powder.

**CFLs:** Compact Fluorescent Lamps are fed into a separate processing machine designed to separate the glass from the CFL base, and capture the mercury, in a controlled environment. The glass portion is then fed into our straight tube processing machine and the bases are sent to a Washington or Oregon-based electronics recycling company.

**HIDs:** High Intensity Discharge lamps are dismantled by hand or by machine. The outer glass envelope is removed, crushed, and sent with other lamp glass to an aggregate company for use in concrete, the metal frame is sent to metal recyclers, and the mercury bearing glass ampules are sent to the same mercury retort company, but to a different location (Arizona) for recovery of the mercury for use in new products or processes.

**Other:** Other types of lamps (U-tubes, circular, neon tubes, etc.) are processed in EcoLights straight tube recycling equipment, with components separated in the same manner into commodities to allow for further recycling.

### **Environmental Health and Safety**

EcoLights maintains a certified ISO 14401 Environmental Health and Safety Management System and employs a full time Environmental Manager and Health & Safety Manager.

EcoLights processing equipment is equipped with pleated filters, HEPA filters, and sulfur impregnated carbon beds to capture dust and mercury vapor before the process air is returned to the processing room. The lamp processing room is also equipped with additional ventilation equipment designed to capture fugitive mercury that operates 24 hours per day. The building is not vented to the outside environment.

All technicians working in the lamp processing room are equipped with full face



respirators designed to capture mercury and protect the employees. They also are equipped with personal protective equipment, including coveralls, steel toed boots, gloves and hairnets to minimize exposure to fugitive mercury in the processing room. All technicians undergo urine testing at hire to establish a baseline and every 6 months to ensure safe levels are maintained.

## **Transportation**

Transportation is completed by these two methods:

1. Direct Dispatch – Collection sites contact EcoLights directly and pick-ups are scheduled to be completed by EcoLights or their parent company, Total Reclaim, or a third-party hauler.
2. FedEx – Box kits are sent out and returned via Fed-ex.

## **Compliance Audit Report**

EcoLights Northwest provides PCA with an annual Compliance Audit Report completed by a qualified third party, which satisfies all the requirements of WAC 173-910-430 (6). Due to the associated risks of the Covid-19 pandemic a virtual audit was conducted.

EcoLights has not received any financial penalties, regulatory orders, or violations regarding the processing of lamps over the last three years.

## **7 Education and Outreach**

### **Advertising and Promotion Completed**

Due to the uncertainty of the financial sustainability of the program, as noted previously, and with the support of Ecology, advertising and promotion were limited in 2021.

- The program website ([www.lightrecycle.org](http://www.lightrecycle.org)) attracted 26,382 unique users and 26,639 visits to the recycling locator tool.
- Forty per cent of website traffic came through referrals from other websites with a quarter of all referrals coming from the Department of Ecology's website.
- Collection sites and retailers were sent printed marketing materials on request.
- Printed marketing materials
  - Information cards (5" x 8") were provided to retailers, local governments and others upon request.
  - Collection site posters were provided upon request.
  - Printed marketing materials can be ordered by phone, email or through the website and are provided at no charge.

Examples of marketing materials and advertisements used by the Program in 2021 are provided in Appendix D.

### **Assessment of Effectiveness**

Advertising was designed primarily to create awareness of the program, drive the audience to the website and specifically to the collection site finder. However, the effectiveness of LRW outreach efforts cannot be gauged solely by the amount of website traffic or materials collected. Other factors such as the cumulative impact of advertising and outreach efforts in previous years can impact collection volumes. The long lifespan of program products also means that program use does not necessarily immediately follow a gain in program awareness.

## 8 Financial Report

The Program is funded through an EHC added to the purchase price of each mercury containing light sold at retail in or into Washington State. The EHC was \$0.25 per unit for all program product types from the start of the program until June 30, 2017. Due to declining sales volumes of mercury lights, particularly CFLs, the EHC was increased to keep the program financially viable, and the increase was approved by the Department of Ecology. The EHC, for all program product types was increased to \$0.50 per unit on July 2, 2017, and further increased to \$0.95 on February 1, 2018.

A breakdown of the revenue generated by the Program in 2021, as well as expenses for Program operations, communications, and administration is provided in Table 4.

Table 4 Program Financial Summary for 2021

Program Revenue	\$1,208,935
Retailer Offset	-\$6,759
<b>Total Revenue</b>	<b>\$1,202,176</b>
Program Expenses	\$731,917
Other Expenses	
Communications	\$2,651
Administration	\$135,989
Regulatory	\$9,004
Total Other Expenses	\$147,664
<b>Total Expenses</b>	<b>\$879,561</b>
<b>Change in Net Assets</b>	<b>\$322,615</b>
<b>Net Assets, beginning of year</b>	<b>\$1,490,012</b>
<b>Net Assets, end of year</b>	<b>\$1,812,627</b>

## Appendix A: Participating Producers and Brands

The following table lists the Producers who participated in LightRecycle Washington during 2021.

Table 5: List of Participating Producers in 2021

	Company Name and Website	Phone	Address
1	Ace Hardware Corporation <a href="http://www.acehardware.com">www.acehardware.com</a>	630-990-6600	2200 Kensington Court Oak Brook, IL 60523
2	Apollo Horticulture <a href="http://www.apollohorticulture.com/">www.apollohorticulture.com/</a>	909-979-7392	2665 Pomona Blvd Pomona, CA 91768
3	Coleman Cable Inc. <a href="http://www.colemancable.com">www.colemancable.com</a>	800-323-9355	1530 Shields Drive Waukegan, IL 60085
4	Dolan Northwest LLC <a href="http://www.seattllelighting.com">www.seattllelighting.com</a>	503-972-5234	222 2nd Avenue Ext. South Seattle, WA 98134
5	Elong International USA Inc. (representing Do it Best Corp) <a href="http://www.elonginternational.com">www.elonginternational.com</a>	972-247-7996	2425 McIver Lane #150 Carrollton, TX 75006
6	Energetic Lighting (Yankon Industries Inc.) <a href="http://www.energeticlighting.com">www.energeticlighting.com</a>	909-591-2345	13445 12th Street Chino, CA 91710
7	Eye Lighting International of North America, Inc. <a href="http://www.eyelighting.com">www.eyelighting.com</a>	440-350-7000	9150 Hendricks Rd. Mentor, OH 44060
8	Feit Electric Company, Inc. <a href="http://www.feit.com">www.feit.com</a>	562-463- 2852	4901 Gregg Rd. Pico Rivera, CA 90660
9	General Electric Lighting <a href="http://www.gelighting.com">www.gelighting.com</a>	216-266-9729	1975 Noble Rd East Cleveland, OH 44112
10	Hawthorne Hydroponics LLC <a href="http://www.hawthorne-gardening.com">www.hawthorne-gardening.com</a> <a href="http://www.sunlightsupply.com">www.sunlightsupply.com</a>	360-883-8846	3204 NW 38 <sup>th</sup> Circle Vancouver, WA 98660
11	LEDVANCE Corp <a href="http://www.ledvance.com">www.ledvance.com</a>	978-570-3000	200 Ballardvale Street Wilmington, MA 01887
12	Maxlite Inc. <a href="http://www.maxlite.com">www.maxlite.com</a>	973-244-7300	12 York Ave. West Caldwell, NJ 07006
13	OttLite Technologies, Inc <a href="http://www.ottlite.com">www.ottlite.com</a>	800-842-8848	220 W 7th Ave, Suite 100 Tampa FL 33602
14	Philips Lighting North America Corporation <a href="http://www.usa.philips.com">www.usa.philips.com</a>	202-962-8567	200 Franklin Square Somerset, NJ 08873
15	Satco Products, Inc. <a href="http://www.satco.com">www.satco.com</a>	631-243-2022	110 Heartland Blvd. Brentwood, NY 11717

	<b>Company Name and Website</b>	<b>Phone</b>	<b>Address</b>
16	Technical Consumer Products Inc. <a href="http://www.tcpi.com">www.tcpi.com</a>	800-324-1496	325 Campus Drive Aurora, OH 44202
17	Ushio America, Inc. <a href="http://www.ushio.com">www.ushio.com</a>	714-236-8600	5440 Cerritos Avenue Cypress, CA 90630
18	Venture Lighting International, Inc. <a href="http://www.venturelighting.com">www.venturelighting.com</a>	800-451-2606	32000 Aurora Road - Suite A Solon, Ohio 44139
19	Westinghouse Lighting Corporation <a href="http://www.westinghouselighting.com">www.westinghouselighting.com</a>	215-671-2000	12401 McNulty Road Philadelphia, PA 19154

*The following brands were sold by producers who participated in LightRecycle Washington during 2021:*

1. ACE
2. AllStart
3. ALTO
4. Apollo Horticulture
5. Apollo Studios
6. BEST CHOICE
7. BRIGHT EFFECTS
8. Ceramalux Agro, Horticulture and HORTI
9. Coleman Cable
10. CVS
11. Designers Edge
12. Destination Lighting
13. Do it Best
14. DOLLAR GENERAL
15. Ecosmart
16. Energetic Lighting
17. Energy Advantage
18. Energy Saver
19. ENERGY SMART
20. EVERYDAY LIVING
21. Eye
22. Eye Hortilux
23. Feit Electric
24. GE
25. GE Lighting Linear Fluorescent and CFLs
26. Halco
27. Master
28. Master SDW White SON
29. MasterColor
30. MaxLite
31. Megalowmart
32. OSRAM
33. OttLite
34. ParPro
35. Philips
36. ProLime
37. Purple Reign
38. Safeway – Bright Green
39. Satco
40. Satco / HYGRADE
41. SMART LIVING
42. Spectralux
43. Sunmaster
44. Super Sprouter
45. SYLVANIA
46. TCP
47. Tospo Brand Lamps
48. TuffGuard
49. Ultra Sun
50. Urban Farmer
51. Ushio
52. Utilitech
53. Venture Lighting
54. Walgreen - Living Solutions
55. Western Family
56. Westinghouse
57. Woods
58. Zoo

## Appendix B: Collection and Processing Verification

The following letter from EcoLights confirms the amount of materials collected and processed by LightRecycle Washington during 2021.



7021 South 220<sup>th</sup> Street  
Kent, WA 98032  
T 206.343.7443  
F 206.343.7445  
ECOLIGHTS.COM

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May 13<sup>th</sup>, 2022

LightRecycle Washington Program  
PCA Product Stewardship Inc.

RE: 2021 Processing Volume

Dear LightRecycle Washington:

This letter is to acknowledge that EcoLights Northwest, LLC picked up or received the following volume of used fluorescent lamps and other materials from collection sites under the LightRecycle Washington program during 2021:

- Total program material weight: 556,672 pounds

This volume includes some non-program materials, such as incandescent lamps in program containers.

Additional back-up documentation of these volumes is available.

We look forward to continuing to provide innovative lamp recycling services to PCA Product Stewardship Inc. and the residents and small businesses of Washington during the coming year.

If you have any questions, please contact me at 206-388-5200.

Sincerely,

A handwritten signature in black ink, appearing to read "Bobby Farris", is written over a faint, light-colored signature line.

Bobby Farris  
CEO  
EcoLights Northwest, LLC

[www.EcoLights.com](http://www.EcoLights.com)

REDUCE > REUSE > RECYCLE

## Appendix C: Registered Collection Sites

The following tables list the registered LightRecycle Washington collection sites who participated in the Program during 2021. Please note, unadvertised sites have not been listed, to maintain confidentiality for those sites who wish to remain unadvertised.

Table 6: Registered Collection Sites who accept all Program Products:

	Collection Site Name	Street	City	State	ZIP Code	County
1	Othello Ace Hardware	420 E Main Street	Othello	WA	99344	Adams
2	Asotin County Regional Landfill	2901 6th Avenue	Clarkston	WA	99403	Asotin
3	Ace Hardware and Sporting Goods on Keene Road	103 Keene Road	Richland	WA	99352	Benton
4	Batteries Plus Bulbs	321 North Columbia Center Blvd.	Kennewick	WA	99336	Benton
5	Goodwill - West Richland	4034 W Van Giesen St. Suite B	West Richland	WA	99352	Benton
6	Grigg's Department Store Ace Hardware	1415 George Washington Way	Richland	WA	99354	Benton
7	Kennewick Ace Hardware and Sporting Goods	2831 W Kennewick Ave.	Kennewick	WA	99336	Benton
8	Patnode's True Value	600 9th St.	Benton City	WA	99320	Benton
9	Riders True Value	117 E Winew Country Rd.	Grandview	WA	98930	Benton
10	Lake Chelan Lighting Center	917 E Woodin Ave	Chelan	WA	98816	Chelan
11	Stan's Merry Mart	733 S. Wenatchee Ave.	Wenatchee	WA	98801	Chelan
12	Around Again	22 Gilbert Rd.	Sequim	WA	98382	Clallam
13	Central Transfer and Recycling	11034 NE 117th Avenue	Vancouver	WA	98662	Clark
14	Hi-School Ace Hardware	1605 W. Main Street	Battle Ground	WA	98604	Clark
15	Hi-School Ace Hardware	13009 NE Hwy. 99	Vancouver	WA	98686	Clark



16	Mt. Pleasant Transfer Facility	1111 MT. Pleasant Rd.	Washougal	WA	98671	Clark
17	Washougal Transfer Station	4020 S Grant Street	Washougal	WA	98671	Clark
18	West Van Materials Recovery Center	6601 NW Old Lower River Road	Vancouver	WA	98660	Clark
19	Columbia County Transfer Station	501 S Cottonwood Street	Dayton	WA	99328	Columbia
20	Bredfield's True Value Hardware	102 Cowlitz St West	Castle Rock	WA	98611	Cowlitz
21	Woodland Ace Hardware	1325 Lewis River Rd	Woodland	WA	98674	Cowlitz
22	City of Bridgeport	1007 Fairview Ave.	Bridgeport	WA	98813	Douglas
23	Rock Island Community Recycling Center	23 S Garden Ave.	Rock Island	WA	98850	Douglas
24	Town of Mansfield	Railroad	Mansfield	WA	98830	Douglas
25	Town of Waterville Community Recycling Center	720 N. Chelan Ave.	Waterville	WA	98858	Douglas
26	Ferry County Public Works - Solid Waste Div.	584 Torboy Dump Road	Republic	WA	99166	Ferry
27	Grigg's Department Store Ace Hardware	801 W Columbia St	Pasco	WA	99301	Franklin
28	Garfield County Public Works	19th and Arlington	Pomeroy	WA	99347	Garfield
29	Marty's True Value Hardware	205 E First Street	Mattawa	WA	99349	Grant
30	Skaug Brothers Ace Hardware	944 W Third Ave.	Moses Lake	WA	98837	Grant
31	LeMay's Central Transfer Station	4201 Olympic Highway	Aberdeen	WA	98520	Grays Harbor
32	Bayview Solid Waste Dropbox and Recycle Park	5790 S. Kramer Road	Langley	WA	98260	Island
33	Camano Island Transfer Station	75 E. Camano Hill Road	Camano Island	WA	98282	Island
34	Camano Plaza Ace	370 NE Camano Drive Ste #1	Camano Island	WA	98282	Island

35	Coupeville Solid Waste Complex	20018 State Highway 20	Coupeville	WA	98239	Island
36	Freeland Ace Hardware	1609 E. Main St.	Freeland	WA	98249	Island
37	North Whidbey Solid Waste Dropbox and Recycle Park	3151 Oak Harbor Road	Oak Harbor	WA	98277	Island
38	Oak Harbor Ace Hardware	150 SE Pioneer Way	Oak Harbor	WA	98277	Island
39	Jefferson County Disposal Site Quilcene	295312 Highway 101	Quilcene	WA	98376	Jefferson
40	Jefferson County Household Hazardous Waste Collection Facility	282 10th St., Bldg 19	Port Townsend	WA	98368	Jefferson
41	Jefferson County Recycle Center	325 County Landfill Road	Port Townsend	WA	98368	Jefferson
42	Bartell Drugs	23028 100th Ave W.	Edmonds	WA	98020-5080	King
43	Bartell Drugs	6939 Coal Creek Pkwy S.E.	Newcastle	WA	98059-3137	King
44	Bartell Drugs	7370 170th Ave NE	Redmond	WA	98052-4457	King
45	Bartell Drugs	526 228th Ave. N.E.	Sammamish	WA	98074-7226	King
46	Batteries Plus Bulbs	12816 SE 38th St.	Bellevue	WA	98006	King
47	Batteries Plus Bulbs	14917 NE 20th St.	Bellevue	WA	98007	King
48	Batteries Plus Bulbs	536 NE Northgate Way	Seattle	WA	98125	King
49	Batteries Plus Bulbs	17065 Southcenter Parkway	Tukwila	WA	98188	King
50	Bow Lake Recycling and Transfer Station	18800 Orillia Road S	Tukwila	WA	98188	King
51	City of Lake Forest Park	17425 Ballinger Way NE	Lake Forest Park	WA	98155	King
52	City of Snoqualmie	38624 SE River Street	Snoqualmie	WA	98065	King
53	Enumclaw Recycling and Transfer Station	1650 Battersby Ave E	Enumclaw	WA	98022	King

54	Factoria Household Hazardous Waste Drop Off Site	13800 SE 32nd St.	Bellevue	WA	98005	King
55	Fairwood Ace Hardware	14100 SE Petrovitsky Road	Renton	WA	98058	King
56	Hero Ace Hardware	1915 4th Ave	Seattle	WA	98101	King
57	Highlands Ace Hardware	4601 NE Sunset Blvd	Renton	WA	98059	King
58	Island Home Center & Lumber	17633 97th Pl SW	Vashon	WA	98070	King
59	Johnsons Home and Garden	26625 Maple Valley Black Diamond Rd.	Maple Valley	WA	98038	King
60	Junction True Value Hardware	4747 44th Ave S.W.	Seattle	WA	98116	King
61	Lake City Tweedy & Popp Hardware	3040 NE 127th St.	Seattle	WA	98125	King
62	Madison Park Hardware	1837 42nd Avenue East	Seattle	WA	98112	King
63	Maple Leaf Ace Hardware	9000 Roosevelt Way NE	Seattle	WA	98115	King
64	McLendon Hardware	23662 104th Ave. SE	Kent	WA	98031	King
65	McLendon Hardware	440 Rainier Ave. S	Renton	WA	98057	King
66	McLendon Hardware	10210 16th Ave. SW	White Center	WA	98146	King
67	McLendon Hardware	17705 130th Ave. NE	Woodinville	WA	98072	King
68	Mercer Island True Value Hardware	7707 SE 27th St. Suite 110	Mercer Island	WA	98040	King
69	North Bend Ace Hardware	330 Main Ave. S	North Bend	WA	98045	King
70	North Seattle Household Hazardous Waste Collection Facility	12550 Stone Avenue North	Seattle	WA	98133	King
71	Northshore Ace Hardware	35419 21ST Ave. S.W.	Federal Way	WA	98023	King
72	Northshore Senior Center	10201 E Riverside Dr.	Bothell	WA	98011	King
73	Pacific Supply	1417 12th	Seattle	WA	98122	King
74	Recology CleanScapes	317 NW Gilman Road #22	Issaquah	WA	98027	King
75	Recology CleanScapes	15235 Aurora Ave N. #102	Shorline	WA	98133-4416	King

76	Recology CleanScapes Burien Retail Store	16200 1st. S.	Burien	WA	98166	King
77	Recology CleanScapes Retail Store	22833 Bothell-Everett Hwy, #111	Bothell	WA	98021	King
78	Seattle Home Builders Center	1110 W Nickerson St.	Seattle	WA	98119	King
79	Second Use Building Materials	3223 6th Ave S	Seattle	WA	98134	King
80	Shoreline Recycling and Transfer Station	2300 N 165th Street	Shoreline	WA	98133	King
81	South Seattle Household Hazardous Waste Collection Facility	8100 2nd Avenue South	Seattle	WA	98108	King
82	Stoneway Hardware and Supply	4318 Stone Way N.	Seattle	WA	98103	King
83	Stoneway Hardware Ballard	4910 15th Ave NW	Seattle	WA	98107	King
84	Total Reclaim	7021 S 220th St	Kent	WA	98032	King
85	Town Center Hardware	6613 132 AVE N.E.	Kirkland	WA	98033	King
86	Town Center Hardware	17171 Bothell Way NE	Lake Forest Park	WA	98155	King
87	Vashon Recycling and Transfer Station	18900 Westside Hwy SW	Vashon	WA	98070	King
88	Wallingford Tweedy & Popp Hardware	1815 N 45th St. Ste. 112	Seattle	WA	98103	King
89	Crown Hill Tweedy and Popp Hardware	9000 Holman Rd. NW	Seattle	WA	98117	King
90	Bainbridge Island Ace Hardware	635 High School Road NE	Bainbridge Island	WA	98110	Kitsap
91	Household Hazardous Waste Collection Facility	5551 SW Imperial Way	Bremerton	WA	98312	Kitsap
92	Scott McLendon's Hardware	1692 Mile Hill Dr.	Port Orchard	WA	98366	Kitsap
93	Swain's General Store	602 E 1st St	Port Angeles	WA	98362	Kitsap
94	Thurman Supply	1807 East Front Street	Port Angeles	WA	98362	Kitsap

95	HopeSource	700 E. Mountain View, Suite 501	Ellensburg	WA	98926	Kittitas
96	Woods Ace Hardware	310 North Pearl Street	Ellensburg	WA	98926	Kittitas
97	Allyns Building Center	517 N Mill St.	Goldendale	WA	98620	Klickitat
98	BZ Corners Transfer Station	5 Firtee Rd	Husum	WA	98623	Klickitat
99	Dallesport Transfer Station	126 Tidyman Rd	Dallesport	WA	98617	Klickitat
100	Goldendale Transfer Station	1205 W Broadway St.	Goldendale	WA	98920	Klickitat
101	Lewis County Solid Waste	1411 So Tower Ave.	Centralia	WA	98531	Lewis
102	Mason County Landfill	501 Eells Hill Rd	Shelton	WA	98584	Mason
103	Scott McLendon's Hardware	51 NE State Route 300	Belfair	WA	98528	Mason
104	Ellisforde Transfer Station	65 Swanson Mill Rd.	Oroville	WA	98844	Okanogan
105	Lee Frank Mercantile	324 S. Whitcomb Ave.	Tonasket	WA	98855	Okanogan
106	Methow Recycles	12 Twisp Airport Road	Okanogan	WA	98856	Okanogan
107	Okanogan County Central Landfill	241 North B&O Rd.	Okanogan	WA	98840	Okanogan
108	Pacific County Household Hazardous Waste Facility	318 N Second St.	Long Beach	WA	98631	Pacific
119	Ace Hardware	4816 Pt. Fosdick Dr. NW	Gig Harbor	WA	98335	Pierce
110	Bartell Drugs	2700 Bridgeport Wy W Suite D	University Place	WA	98466-4600	Pierce
111	Batteries Plus Bulbs	31830 Pacific Hwy S	Federal Way	WA	98003	Pierce
112	Batteries Plus Bulbs	10210 123rd St. Ct. E	Puyallup	WA	98374	Pierce
113	Batteries Plus Bulbs	4027 Tacoma Mall Blvd.	Tacoma	WA	98409	Pierce
114	Crescent Lighting	3214 20th Street East	Fife	WA	98424	Pierce
115	Graham Ace Hardware	9807 224 <sup>th</sup> St. E Suite 108	Graham	WA	98338	Pierce
116	JBLM DPW Environmental Operations	Bldg. 1210 Mann Ave. Box 339500 MS #17	Joint Base Lewis McChord	WA	98433	Pierce
117	Lakewood Ace Hardware	8123 Steilacoom Blvd. SW	Lakewood	WA	98498	Pierce
118	McLendon Hardware	11307 Canyon Rd. E	Puyallup	WA	98373	Pierce

119	McLendon Hardware	1111 Fryer Ave.	Sumner	WA	98390	Pierce
120	McLendon Hardware	1015 N. Pearl Street	Tacoma	WA	98406	Pierce
121	Ace Hardware of Friday Harbor	340 Argyle Avenue	Friday Harbor	WA	98250	San Juan
122	CT Recycling	6739 Roche Harbor Road	Friday Harbor	WA	98250	San Juan
123	Lopez Solid Waste	2449 Fisherman Bay Road	Lopez Island	WA	98261	San Juan
124	The Exchange/Orcas Recycling Services	3398 Orcas Road	Eastsound	WA	98245	San Juan
125	Ace Hardware of Anacortes	1720 "Q" Avenue	Anacortes	WA	98221	Skagit
126	Chuckanut Lighting	938 Fountain St.	Burlington	WA	98233	Skagit
127	City Recycling Center	315 Sterling Street	Sedro-Woolley	WA	98284	Skagit
128	Ekrem Hardware Do-It Center	237 E. Fairhaven Ave.	Burlington	WA	98233	Skagit
129	Kaptein's Ace Hardware	1420 Riverside Dr.	Mount Vernon	WA	98273	Skagit
130	Skagit County Household Hazardous Waste Facility	14104 Ovenell Rd	Mount Vernon	WA	98273	Skagit
131	Columbia Hardware	24 NE 2nd St	Stevenson	WA	98648	Skamania
132	J & L Farm & Home	961 Wind River Road	Carson	WA	98610	Skamania
133	Stevenson Transfer Facility	1332 Ryan Allen Rd.	Stevenson	WA	98648	Skamania
134	Underwood Transfer Facility	1402 Little Buck Creek Rd.	Underwood	WA	98650	Skamania
135	Ace Hardware	303 91st Ave NE	Lake Stevens	WA	98258	Snohomish
136	Ace Hardware of Evergreen Way	4835 Evergreen Way	Everett	WA	98203	Snohomish
137	Ace Hardware of Silver Lake	11014 19th Avenue SE Ste. 100	Everett	WA	98208	Snohomish
138	Airport Road Recycling & Transfer Station	10700 Minuteman Dr.	Everett	WA	98204	Snohomish
139	Bartell Drugs	6602 64th Street NE	Marysville	WA	98270-4834	Snohomish
140	Batteries Plus Bulbs	909 SE Everett Mall Way	Everett	WA	98208	Snohomish
141	Batteries Plus Bulbs	4028 196th St. SW	Lynnwood	WA	98036	Snohomish
142	Batteries Plus Bulbs	4008 172nd St NE, Suite D	Arlington	WA	98223	Snohomish

143	Cedar Plaza Ace Hardware	22803 44th Ave. West Suite D-2	Mountlake Terrace	WA	98043	Snohomish
144	City of Mill Creek	15728 Main Street	Mill Creek	WA	98012	Snohomish
145	City of Monroe	City Hall at City of Monroe	Monroe	WA	98272	Snohomish
146	Darrington Hardware & Supply	1220 SR 530 NE	Darrington	WA	98241	Snohomish
147	Dubuque Road Neighborhood Recycling & Disposal Center	19619 Dubuque Road	Snohomish	WA	98290	Snohomish
148	Edmonds Hardware and Paint	201 5th Ave. S Suite 206	Edmonds	WA	98020	Snohomish
149	Granite Falls Neighborhood Recycling & Disposal Center	7526 Menzel Lake Road	Granite Falls	WA	98252	Snohomish
150	Homegrown Hydros	1241 State Ave, #102	Marysville	WA	98270-4834	Snohomish
151	Household Hazardous Waste Drop-off Station	3434 McDougall Ave.	Everett	WA	98201	Snohomish
152	Mukilteo Ace Hardware	12680 Mukilteo Speedway	Mukilteo	WA	98275	Snohomish
153	North County Recycling & Transfer Station	19600 63rd Ave. NE	Arlington	WA	98223	Snohomish
154	Southwest Recycling & Transfer Station	21311 61st Place West	Mountlake Terrace	WA	98043	Snohomish
155	Stanwood Ace Hardware	26477 72nd Ave NW	Stanwood	WA	98292	Snohomish
156	Sultan Neighborhood Recycling & Disposal Center	33014 Cascade View Drive	Sultan	WA	98294	Snohomish
157	Ace Hardware and Paint	906 S. Monroe	Spokane	WA	99204	Spokane
158	Batteries Plus Bulbs	11101 East Sprague	Spokane	WA	99206	Spokane
159	Batteries Plus Bulbs	7704 North Division Suite C	Spokane	WA	99208	Spokane
160	City of Cheney Recycling Center	100 Anderson Road	Cheney	WA	99004	Spokane
161	Deer Park Ace Hardware	141 West H Street	Deer Park	WA	99006	Spokane
162	South Hill Ace Hardware	4416 S. Regal St.	Spokane	WA	99223	Spokane

163	Spokane Valley Ace Hardware	15405 E. Sprague Ave	Spokane Valley	WA	99037	Spokane
164	Sunshine Disposal and Recycling	2405 N. University Rd.	Spokane Valley	WA	99206	Spokane
165	Wandermere Ace Hardware	12908 N. Hwy. 395	Spokane	WA	99218	Spokane
166	Waste Connections of Spokane	22123 N. Elk-Chattaroy Road	Colbert	WA	99005	Spokane
167	Waste Connections of Spokane	3941 North Sullivan Road	Spokane Valley	WA	99216	Spokane
168	Colville Hardware Do It Center	984 S. Main St.	Colville	WA	99114	Stevens
169	Sety's Ace Hardware	301 E. Main	Chewelah	WA	99109	Stevens
170	Batteries Plus Bulbs	2905 Capital Mall Dr. SW	Olympia	WA	98502	Thurston
171	Lincoln Creek Lumber/Ace Hardware	2421 93rd Ave SW	Tumwater	WA	98512	Thurston
172	Olympia Ace Hardware	400 Cooper Point Road	Olympia	WA	98502	Thurston
173	Thurston County Hazohouse	2420 Hogum Bay Rd NE	Lacey	WA	98516	Thurston
174	Batteries Plus Bulbs	632 South 9th Ave.	Walla Walla	WA	99362	Walla Walla
175	Sudbury Regional Landfill, City of Walla Walla	414 Landfill Rd.	Walla Walla	WA	99362	Walla Walla
176	Ace Hardware	1736 Front Street	Lynden	WA	98264	Whatcom
177	Ferndale Ace Hardware	5715 4th Ave.	Ferndale	WA	98248	Whatcom
178	Pacific Building Center - True Value Hardware	2677 Bell Road	Blaine	WA	98230	Whatcom
179	WFC Blaine Ace Hardware	1733 H Street Suite 700	Blaine	WA	98230	Whatcom
180	WFC Fairhaven True Value	3125 Old Fairhaven Parkway	Bellingham	WA	98225	Whatcom
181	WFC Fairway True Value	119 17th St.	Lynden	WA	98264	Whatcom
182	Whatcom County Disposal of Toxics Facility	3505 Airport Drive	Bellingham	WA	98226	Whatcom
183	Pullman Disposal Service	135 NW Harold Dr.	Pullman	WA	99163	Whitman



184	Whitman County Public Works Solid Waste Facility	252 Landfill Road	Pullman	WA	99163	Whitman
185	City of Sunnyside	818 East Edison	Sunnyside	WA	98944	Yakima

Table 7: Registered Collection Sites who accept CFLs only:

	Collection Site Name	Street	City	State	ZIP Code	County
1	Clark Public Utilities - Electric Center	1200 Fort Vancouver Way	Vancouver	WA	98663	Clark
2	Clark Public Utilities - Operations Office	8600 NE 117 Ave.	Vancouver	WA	98662	Clark
3	Bartell Drugs	3902 "A" St. S.E.	Auburn	WA	98002-8610	King
4	Bartell Drugs	10116 NE 8th Street	Bellevue	WA	98004-4148	King
5	Bartell Drugs	11919 NE 8th St.	Bellevue	WA	98005-3023	King
6	Bartell Drugs	3620 Factoria Blvd. SE	Bellevue	WA	98006-6128	King
7	Bartell Drugs	653 156th Ave NE	Bellevue	WA	98007-4823	King
8	Bartell Drugs	18001 Bothell-Everett Hwy, Suite 101	Bothell	WA	98012-1660	King
9	Bartell Drugs	22833 Bothell-Everett Hwy	Bothell	WA	98021-9385	King
10	Bartell Drugs	14901 4th Ave SW, Suite 100	Burien	WA	98166-1906	King
11	Bartell Drugs	21615 Pacific Hwy S.	Des Moines	WA	98198-7703	King
12	Bartell Drugs	27055 Pacific Hwy S.	Des Moines	WA	98198-9250	King
13	Bartell Drugs	5700 East Lake Sammamish Pkwy SE	Issaquah	WA	98029-8914	King
14	Bartell Drugs	12946 SE Kent-Kangley Rd.	Kent	WA	98030-7940	King
15	Bartell Drugs	10625 N.E. 68th	Kirkland	WA	98033-7054	King
16	Bartell Drugs	14130 Juanita Dr. N.E Ste. 107	Kirkland	WA	98034-0127	King
17	Bartell Drugs	14442 124th Ave. N.E.	Kirkland	WA	98034-4801	King
18	Bartell Drugs	6619 132nd Ave. N.E.	Kirkland	WA	98033-8627	King
19	Kirkland City Hall	123 5th Ave	Kirkland	WA	98033	King
20	Bartell Drugs	2518 196th St SW	Lynnwood	WA	98036	King
21	Bartell Drugs	22117 SE 237th St.	Maple Valley	WA	98038-8533	King
22	Bartell Drugs	248 Bendigo Boulevard South	North Bend	WA	98045	King

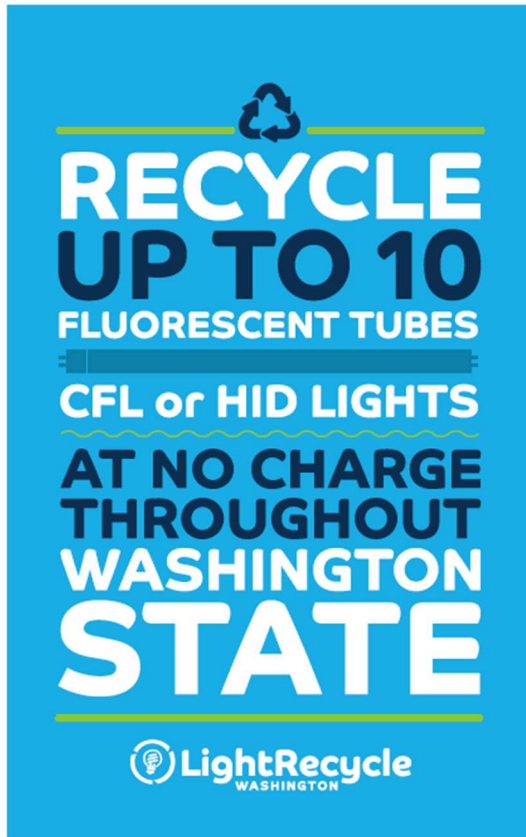
	Collection Site Name	Street	City	State	ZIP Code	County
23	Bartell Drugs	8862 161st Ave NE, Suite 102	Redmond	WA	98052- 7553	King
24	Bartell Drugs	17254 140th Ave SE	Renton	WA	98058- 7014	King
25	Bartell Drugs	4700 NE 4th Street	Renton	WA	98059- 4800	King
26	Bartell Drugs	2222 32nd Ave. W.	Seattle	WA	98199- 4044	King
27	Bartell Drugs	910 Fourth Ave	Seattle	WA	98164- 1000	King
28	Bartell Drugs	100 N 85th St.	Seattle	WA	98103- 3602	King
29	Bartell Drugs	1001 Mercer Street	Seattle	WA	98109- 4234	King
30	Bartell Drugs	1101 Madison St.	Seattle	WA	98104- 1306	King
31	Bartell Drugs	1404 Third Ave.	Seattle	WA	98101- 2106	King
32	Bartell Drugs	1407 Broadway Ave.	Seattle	WA	98122- 3854	King
33	Bartell Drugs	1500 NW Market Street, Suite 101	Seattle	WA	98107- 5211	King
34	Bartell Drugs	1628 Fifth Avenue	Seattle	WA	98101- 1606	King
35	Bartell Drugs	1820 N 45th St.	Seattle	WA	98103- 6803	King
36	Bartell Drugs	1929 Queen Anne Ave. N	Seattle	WA	98109- 2549	King
37	Bartell Drugs	2345 Rainier Ave. South	Seattle	WA	98144- 5348	King
38	Bartell Drugs	2345-42nd Avenue SW	Seattle	WA	98116- 2513	King
39	Bartell Drugs	2700 NE University Village St.	Seattle	WA	98105- 5016	King
40	Bartell Drugs	3018 NE 125th Street	Seattle	WA	98125- 4424	King
41	Bartell Drugs	4344 University Way N.E.	Seattle	WA	98105- 5809	King
42	Bartell Drugs	4706 42nd Ave. S.W.	Seattle	WA	98116- 4500	King
43	Bartell Drugs	600 First Ave. N.	Seattle	WA	98109- 4001	King
44	Bartell Drugs	6401 12th Ave NE	Seattle	WA	98115- 6754	King
45	Bartell Drugs	9600 15th Ave. S.W.	Seattle	WA	98106- 2820	King

	Collection Site Name	Street	City	State	ZIP Code	County
46	Seattle City Light	1300 N. 97th St.	Seattle	WA	98103	King
47	Seattle City Light	3613 4th Ave. S.	Seattle	WA	98134	King
48	Bartell Drugs	400 S Jackson St Ste 300	Seattle	WA	98104	King
49	Bartell Drugs	5625 22nd AVE NW	Seattle	WA	98107	King
50	Bartell Drugs	18420 Aurora Ave N	Shoreline	WA	98133-4416	King
51	Bartell Drugs	14277 Pacific Hwy. S.	Tukwila	WA	98168-4124	King
52	Bartell Drugs	5500 Olympic Drive	Gig Harbor	WA	98335-1487	Pierce
53	Bartell Drugs	3601 6th Ave S	Tacoma	WA	98406-5405	Pierce
54	Orcas Power and Light Cooperative	183 Mt. Baker Rd.	Eastsound	WA	98245	San Juan
55	Orcas Power and Light Cooperative	1034 Guard St.	Friday Harbor	WA	98250	San Juan
56	Bartell Drugs	11020 19th Ave. S.E.	Everett	WA	98208-5155	Snohomish
57	Bartell Drugs	1825 Broadway	Everett	WA	98201-2348	Snohomish
58	Bartell Drugs	5006 132nd ST SE Building A	Everett	WA	98208-9517	Snohomish
59	Bartell Drugs	621 SR9 N.E.	Lake Stevens	WA	98258-8525	Snohomish
60	Bartell Drugs	17633 Highway 99	Lynnwood	WA	98037-3627	Snohomish
61	Bartell Drugs	3625 148th St., SW, Suite B	Lynnwood	WA	98087-5522	Snohomish
62	Bartell Drugs	22803 44th Ave. W.	Mountlake Terrace	WA	98043-5032	Snohomish
63	Bartell Drugs	1115 13th St.	Snohomish	WA	98290-2012	Snohomish
64	Bartell Drugs	7205 267th St. NW	Stanwood	WA	98292-6237	Snohomish
65	Everett Community College	2000 Tower Street	Everett	WA	98201	Snohomish
66	Bellingham Ace Hardware	356 36 <sup>th</sup> St.	Bellingham	WA	98225	Whatcom


## Appendix D: Advertising and Promotional Materials

The following images are examples of the advertising and promotional materials used by LightRecycle Washington in 2021.

### Information Card, 5" x 8" Updated in 2017





Collection Site Posters, 11" x 17"



**RECYCLE**  
**FLUORESCENT, CFL & HID**

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**LIGHTS**



**AT NO CHARGE**  
**HERE**

Recycle up to 10 lights per day!  
For more information and to find other collection sites throughout the state visit [LightRecycle.org](http://LightRecycle.org) or call us toll-free on 1-877-592-2972.

A PCA Product Stewardship program  
501(c)(3) non-profit



Newspaper Advertisements (exact dimensions vary)



# FREE Fluorescent Light and CFL Collection Event

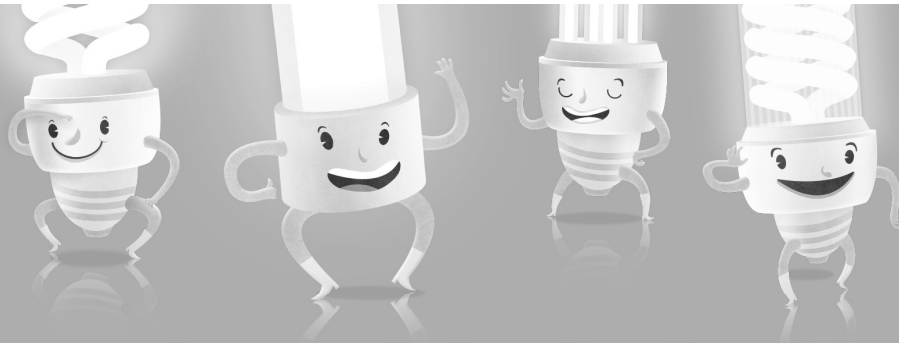
**Ramm Hardware,  
5 West 1st Ave. Odessa, WA  
September 27 | 8am – 5pm**

✓  
**Accepted Products**



Fluorescent Tubes (all shapes), Compact Fluorescent Lights (CFLs)  
and High Intensity Discharge (HIDs) Lights

**LightRecycle.org**  **LightRecycle**  
WASHINGTON



## Recycle your lights for free in Washington State!

It's never been easier to recycle fluorescent lights and CFLs. You can drop off up to 10 lights per day for free at:

1

Washougal Transfer Station  
4020 S Grant Street  
Washougal, WA

2

Mt. Pleasant Transfer Facility  
1111 MT. Pleasant Rd.  
Washougal, WA

[lightrecycle.org](http://lightrecycle.org)

 **LightRecycle**  
WASHINGTON





## Recycle lights for free in Washington State!

It's never been easier to recycle fluorescent lights  
and CFLs. You can drop off up to 10 lights per day  
for free at:

Longview Ace Hardware  
600 Triangle Mall  
Longview, WA

[lightrecycle.org](http://lightrecycle.org)



## Appendix E: Processor Compliance Audit

The following is the 2021 compliance audit report of the Programs processor Ecolights Northwest, LLC conducted by Greeneye Partners, LLC, on Nov 17, 2021.



## AUDITOR'S CHECKLIST FOR USE IN LIGHTS PROCESSOR STANDARD ASSESSMENT

### I. FACILITY INFORMATION

Facility Name: Ecolights Northwest, LLC

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Address: 1915 S. Corgiat Drive-Seattle, WA

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Contact Information: Jesse McCullough - Environmental Health & Safety Professional; Todd Megiveron – Facility Manager.

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Descriptive Information About Facility Operations: Light processing facility

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Audit Date: November 17th, 2021

Auditor: Tom Delich, Greeneye Partners, LLC

### II. LIGHTS PROCESSOR STANDARD

1. General Requirements - Does the Processor:			
#	Light Processor Standard Requirement	Y/N	Auditor Comments
1.1	Have a valid business license?	Y	Management approved EHSMS policy is posted on the website and in the facility entryway.
1.2	Comply with and be in good standing with all applicable federal, state, local regulations and requirements including but not limited to: <ul style="list-style-type: none"> <li>• Department of Transportation (D.O.T.)</li> <li>• Basel Convention on Control of Transboundary Movements of Hazardous Waste and their Disposal</li> <li>• Air emissions and effluent discharge regulations</li> </ul>	Y	The facility has a summary of all current applicable statues, regulations, and applicable requirements along with an active compliance calendar, which shows requirements throughout the year.  Puget Sound Clean Air Agency conducted a spot audit March 7 <sup>th</sup> , 2019. There were no findings during the visit.  The facility is ISO 14001 certified. The annual certification audit is scheduled for December 2021.

1.2 Cont.	<p>Comply with and be in good standing with all applicable federal, state, local regulations and requirements including but not limited to:</p> <ul style="list-style-type: none"> <li>• U.S. Resource Conservation and Recovery Act, Universal Waste Regulations, Federal Mercury Exporting rules and Washington State Dangerous Waste Law</li> <li>• Occupational Safety and Health Administration (OSHA) and State Health and Safety Regulations</li> </ul>		
1.3	Prohibit the export of hazardous materials/waste throughout the recycling chain to non-OECD/non-EU countries?	Y	No material resulting from lamp processing is exported – no “transboundary” shipments are made. All outbound material from lamp processing goes to domestic recipients that have been reviewed, audited and/or otherwise approved by top management.
1.4	Use downstream mercury processors who prohibit the incineration and/or export of mercury from the U.S.?	Y	
1.5	Perform due diligence on all material handlers in the recycling chain as laid out in Section 6?	Y	The facility conducts due diligence on their downstream through desk audits, and on-site audits. The facility sends mercury bearing products and mercury phosphor powder to Lighting Resources IN. The facility had an onsite audit on file from 2020v on Lighting Resources IN. PCBs are no longer managed or accepted onsite but if the occasional PCB-containing Ballasts are identified in light fixtures they are send to VEOLIA, AZ, an approved vendor.
1.6	Prohibit the use of prison labor?	Y	
1.7	Possess Comprehensive or Commercial General Liability Insurance including coverage for bodily injury, property damage, complete operations and contractual liability with combined single limits of not less than \$2 million per occurrence and \$2 million general aggregate?	Y	Facility holds \$1M Each/2M Agg per occurrence Commercial General Liability Insurance, \$5,000,000 general aggregate and a \$5,000,000 per occurrence and aggregate Umbrella Liability Insurance, Automobile Liability \$1,000,000, and Workers Comp \$1,000,000. Insurance expires 7-1-22.

1.8	Possess Environmental Liability Insurance with combined single limits of not less than \$2 million per occurrence and \$2 million general aggregate?	Y	Facility holds \$5,000,000 per occurrence and aggregate Pollution Liability with 25k deductible, Insurance with an expiration date of 7/1/24.
1.9	List the Stewardship Organization (in 1.4 and 1.5) as an additional insured party?	Y	Yes
1.10	Possess and maintain in good standing workers compensation and unemployment insurance coverage through a state program or through private insurance policy or sufficient self-insurance coverage?	Y	Facility utilizes statutory state Workers Compensation coverage.
1.11	Maintain all records for a minimum of 3 years, including but not limited to manifests, other shipping documents, waste records, and chain of custody for all lamp materials processed?	Y	The facility has a digital record of all documentation from the last three years.
1.12	Possess valid state approved permits, plans, and approvals, as applicable?	Y	Sellers Permit, Fire Permit, Business License are all valid.
1.13	Possess a calibrated and certified scale?	Y	Cheyenne Scale Company 7-21-21 calibrated the scales.
1.14	Possess a valid EPA identification number, as applicable?	Y	EPA ID# WAH000026371
1.15	Possess valid air emission permits, stormwater and effluent discharge permits, as applicable?	Y	The facility is not required to obtain a stormwater permit, they have an NOI.  The facility has a notice of construction Air Permit for each of the processes. Auditor reviewed permits for the processes.
1.16	Maintain a documented closure plan that identifies at a minimum the financial requirements upon closure and the financial mechanism for ensuring the availability of such funds, such as a security or performance bond or other similar financial instruments, and how the existing inventory of products/waste will be managed	Y	The facility has a Lexon Insurance Company in a bond in the amount of \$98,490.15. PSI/EcoLights are responsible for the closure of the facility.

1.17	Maintain a process to provide written notice of closure to the Stewardship Organization with a minimum of 90-days advance notice?	Y	The closure plan has a documented time frame, which shows the first 90 days of the planned closure requiring a written notice to the Stewardship Organization.
1.18	Maintain a process to provide notice to the Stewardship Organization of any incidents that required the assistance of first responders within 24 hours of the occurrence. Provide written notice of any regulatory orders or fines within 48 hours of receiving such orders or fines?	Y	They have a documented Legal Requirements that requires notice to the Stewardship Organization within 24 hours.

<b>2 – Environmental, Health and Safety Management Systems – Does the Processor:</b>			
<b>#</b>	<b>Light Processor Standard Requirement</b>	<b>Y/N</b>	<b>Auditor Comments</b>
2.1	Maintain a written policy approved by senior management outlining corporate commitment to environmental management and continuous improvement?	Y	Management approved EHSMS policy is posted on the website and in the facility entryway.
2.2	Maintain a summary of current applicable statutes, regulations, and other applicable requirements such as this standard that are relevant to the processor's operations?	Y	The facility has a summary of all current applicable statues, regulations and applicable requirements along with an active compliance calendar, which shows requirements throughout the year.

2.3	<p>Maintain a documented process to identify, track, assess, and ensure compliance with any changes to regulatory and other applicable requirements including this standard, on an ongoing basis, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Environmental regulations</li> <li>• Waste and hazardous waste regulations</li> <li>• OSHA regulations</li> <li>• Air emissions and water discharge regulations</li> <li>• Transportation regulations</li> </ul>	Y	<p>Uses the Legal Compliance Regulatory spreadsheet and they have elected a third party for annual internal audits plus have an 3<sup>rd</sup> party audit by a certification body for ISO14001:2015.</p> <p>The facility has a Legal and Other Requirements that documents Air Emission Control, Waste Management, Health and Safety, Miscellaneous Legal Requirements and other requirements</p>
2.4	<p>Implement and maintain an emergency response plan to prepare for and respond to emergencies including fires, spills, and medical?</p>	Y	<p>Emergency Response Drill was conducted 6-10-21.</p>
2.5	<p>Maintain a documented process to record and track the results of an annual risk assessment of the potential environmental and health &amp; safety impact of the operation and any corresponding corrective and/or preventive actions taken?</p>	Y	<p>The ISO internal audit process manages issues identified and has a corrective action process. The facility has a designated health and safety risk assessment by job category and a specific environmental assessment.</p>
2.6	<p>Maintain a documented process for employees to report and record any accidents, injuries, spills, near misses, and other incidents that could have resulted in an injury or an unauthorized release to the environment?</p>	Y	<p>The facility has an online form that tracks incidents, and requires personnel to identify the root cause, and conduct a risk analysis after the incident as well.</p>
2.7	<p>Maintain a documented process to record and track any accidents, injuries or violations and any corresponding corrective and/or preventive actions taken?</p>	Y	<p>The facility tracks and records all accidents, injuries, and any violations through their CAPA form that is part of the incident form.</p>

2.8	Maintain a documented process to communicate to employees the results of the risk assessment and any injuries, accidents, near misses, spills and unauthorized releases and the corresponding corrective/preventative actions taken?	Y	Internal communication is conducted through bulletin board postings, safety meetings and trainings.
2.9	Conduct and document an annual review of the EHSMS, by senior management or a third-party auditor, to ensure adequacy and effectiveness?	Y	The facility conducts annual internal audits through a third-party company. The internal audit was conducted at the time of the Light Processor Standard Audit on November 17 <sup>th</sup> , 2021. The facility also receives certification body audits annually for ISO 14001.

<b>3 – Environmental Health and Safety Risk Assessment - Does the Processor:</b>			
<b>#</b>	<b>Light Processor Standard Requirement</b>	<b>Y/N</b>	<b>Auditor Comments</b>
3.1	A process to identify physical and chemical hazards and to assess the probability and severity such hazard?	Y	The facility identified risks by the hazard and exposure in a rating of 1-25. Rating 1-3 Low Risk, 4-6 Moderate Risk, 8-10 is moderate, and 12-25 is an unacceptable risk and requires controls.
3.2	A process to identify areas with potential negative impacts to the environment and to assess the probability and severity of such hazards?	Y	The facility has a well-documented form risk and hazard form that incorporates all the different types of hazards.
3.3	A process to determine the appropriate level of control necessary to eliminate or effectively control the hazards?	Y	Yes, rating is from 1-25 with requirements for unacceptable risks in the rating of 12-25.
3.4	A process to identify the frequency and need for air quality monitoring/assessment, noise level monitoring/assessment, medical surveillance, and the development and implementation of an exposure plan as required by regulation?	Y	The air pollution permits require testing three times per day. Annual hearing tests are conducted. Air monitoring testing results were reviewed during the audit.



<b>4 –Environmental, Health, and Safety Controls - Does the Processor:</b>			
4.1	Develop, maintain, and document a training program for the handling and management of lights including but not limited to:	Y	The facility conducts handling and management of lights training annually with refresher trainings throughout the year. OSHA training is conducted monthly.
	<ul style="list-style-type: none"> <li>• Potential hazards and risks associated with handling of lights</li> <li>• Proper and safe handling &amp; storage of lights</li> <li>• Proper use of processing and safety equipment including proper use and care of PPE</li> <li>• Proper spill/breakage clean up and management</li> <li>• Safety and emergency procedures</li> <li>• Accident/injury reporting and management</li> <li>• Emergency response plan</li> </ul>	Y	The required training is conducted annually. Training records were reviewed for 2021 and 2020.
4.2	Implement and enforce hygiene practices, eating, drinking, smoking restrictions, and decontamination procedures to minimize risk of exposure to hazardous materials?	Y	The auditor noted uniforms for workers in the mercury containing room during virtual walkthrough. They are required to strip uniforms when they are on break and leaving the facility.
4.3	Implement and maintain good housekeeping procedures?	Y	The facility conducts a weekly checklist that goes over general housekeeping along with procedures to keep good housekeeping standards.
4.4	Provide adequate personal protective equipment and spill response equipment?	Y	Auditor noted PPE for all employees.
4.5	Provide physical guards to protect against mechanical hazards and other physical hazards?	Y	Physical guards were all in place on hazardous machines.
4.6	Conduct a baseline sampling program for noise level monitoring, air quality monitoring, effluent discharge, and hazardous waste delisting and develop a sampling program based on the risk assessment and baseline testing results?	Y	Three times daily Jerome Meter testing of processing room air occurs, with corrective actions taken as required by regional air agency.

4.7	Implement a medical surveillance program as needed based on the risk assessment and the baseline test results?	Y	Urine level monitoring is conducted twice a year for lamp processing personnel and annually for all other employees.
4.8	Conduct and document on an annual basis, testing of the emergency response plan, review results, and revise as necessary?	Y	Emergency response drills were conducted 6-10-21.
4.9	Conduct monthly fire safety equipment inspections and testing at a minimum annually?	Y	Auditor noted initialing on fire safety equipment and annual inspections of fire safety equipment from a third party.
4.10	Implement and document an equipment inspection and maintenance schedule for any mechanical processing equipment and mechanical systems/apparatus engineered to reduce emissions and worker exposure?	Y	The facility has a well-documented system for each equipment and monitoring checklist for each piece of equipment.
4.11	Implement and document a calibration process for any testing equipment used to perform air monitoring as applicable?	Y	The facility has a well-documented system for each equipment and monitoring checklist for each piece of equipment.
4.12	For automated equipment, ensure there is an emergency shut-off system?	Y	

<b>5 – Material Handling – Does the Processor:</b>			
<b>#</b>	<b>Light Processor Standard Requirement</b>	<b>Y/ N</b>	<b>Auditor Comments</b>
5.1	Maintain adequate security measures to prevent unauthorized access to premise and storage areas?	Y	Facility is secured during non-working hours. Keypad entry and motion sensors were recently installed. All visitors are required to sign in and an escort is required always. There are 8 surveillance cameras throughout the building.

5.2	Ensure that unprocessed lights and hazardous components are stored and processed in compliance with Universal and Hazardous Waste regulations and in an area that is protected from environmental elements and away from drains and catch basins?	Y	Auditor noted appropriate handling of hazardous waste and universal waste during walkthrough.
5.3	Ensure that lights are processed within 90 days of receipt or in compliance with regulations?	Y	All lights are processed within 72 hours.
5.4	Provide training with respect to proper completion of shipping documents and record keeping?	Y	Auditor noted completion of shipping and record keeping. Employees were trained on procedures. The facility has a robust training program in place.
5.5	Maintain and document a tracking system for the facility that includes at a minimum: <ul style="list-style-type: none"> <li>• Total mercury-containing lights received by the Program in pounds, by month</li> <li>• Total amount received by month, by site and by County</li> <li>• Total volumes processed YTD</li> <li>• Volumes in inventory</li> <li>• Volumes shipped to downstream processors</li> </ul>	Y	The facility can calculate monthly pounds by plan material.
5.6	Document the downstream flow and handling of lights from receipt at processor's facility to each point of final disposition, including details on how the various components are processed at each point and the amounts /percentages sent to each downstream processor. The stewardship organization will treat specific downstream processor names as confidential?	Y	The facility has a documented due diligence plan and has documentation to EOL of material. Onsite audit of Lighting Resources, IN conducted in 2020 was on file.
5.7	Provide the program with written 90-day notification of intentions to change downstream processors and await written approval from program prior to changing downstream processors?	Y	Process in place.

5.8	Maintain evidence of permits or licenses of transporters utilized for transportation of Universal Waste and Hazardous Waste?	Y	Auditor reviewed all applicable permits.
5.9	Maintain evidence of permits/approvals/license of downstream processors/service providers utilized for universal Waste and Hazardous Waste management?	Y	Downstream due diligence was conducted, and permits/certificates were available.
5.10	Provide certificates of recycling for all program material received and processed?	Y	
5.11	Commit to a system of continuous improvement with respect to moving materials up the recycling hierarchy and to notify the program of any new opportunities or technologies to move the final destination of materials up the pollution prevention hierarchy?	Y	Yes, ISO: 14001

<b>6-Downstream Due Diligence – Does the Processor:</b>			
<b>#</b>	<b>Light Processor Standard Requirement</b>	<b>Y/ N</b>	<b>Auditor Comments</b>
6.1	Perform desk audits of all downstream vendors that include copies of permits, licenses, certifications, EHSMS policies and table of contents.	Y	Onsite audit of downstream processor Lighting Resources IN was on file. Desk Audit of Veolia was available.
6.2	Perform an initial onsite audit of downstream vendors who manage mercury and repeat site audits every other year with desk reviews on the off years. If they operation changes significantly or there are permit violations, an additional audit may be performed.	Y	Yes, available on file.

**Auditor Notes and or Findings:**

This audit was conducted by Tom Delich, EHS Auditor at Greeneye Partners. The review of the audit was conducted by Kelley Keogh, Co-Founder/Managing Director of Greeneye Partners, LLC. Tom Delich and Kelley Keogh are ISO 9001, ISO 14001, ISO 45001, e-Stewards and R2 internal auditors. The State of Washington's DOE maintains Kelley Keogh's auditor qualifications on file.