

2021 Program Plan Update

Washington State Mercury-Containing Lights

PREPARED AND SUBMITTED BY:

PCA Product Stewardship Inc.

Updated July 1,
2021

2015-2025 Product
Stewardship Plan

The Washington State Mercury-Containing Lights Product Stewardship Program Plan is developed pursuant to the provisions of the Revised Code of Washington Chapter 70A.505 RCW

For submission to:

Washington State Department of Ecology

Solid Waste Management Program

Attn: Al Salvi, Lindsey Ladd

Submitted by:

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PCA Product Stewardship Inc.

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INTRODUCTION

The Washington State Mercury-Containing Lights Product Stewardship Program Plan (referred throughout this document as the “Plan”) was developed by PCA Product Stewardship Inc. (“PCA”) pursuant to the provisions of Chapter 70A.505 of the Revised Code of Washington (Chapter 70A.505 RCW) “Mercury-containing lights-proper disposal”. The original Plan was approved by the Washington State Department of Ecology (Ecology) on December 18, 2014.

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 70A.505 RCW.

According to the law, “...Improper disposal methods (for mercury lights) will lead to mercury releases that threaten the environment and harm human health” (RCW 70A.505.010). This Plan outlines a Program intended to reduce improper disposal practices in Washington State. The Program has been operational since January 1, 2015. A Program Plan update is required “at least two years from the start of the product stewardship program and once every four years thereafter” (RCW 70A.505.040). An update was submitted to Ecology and approved on January 3, 2017. This is the 2021 Program Plan update.

This Program operated by PCA in accordance with the Plan is known as LightRecycle Washington (referred to in this document as the “Program”). The intent of the Program is to operate a comprehensive, safe, and convenient collection, transportation, processing, recycling and final disposition system for a state-wide mercury-containing lights recycling Program (RCW 70A.505.020).

1.1 Plan Elements

The key elements of the operation of the Program are:

- **Stewardship Organization:** The Producers listed in Appendix A have designated PCA as the Stewardship Organization for the Washington State mercury-containing lights

product stewardship Program. PCA has implemented this Plan on behalf of the participating Producers. The Program is publicly known as LightRecycle Washington.

- **Funding:** As of January 1, 2015, all mercury containing lights sold at retail in or into Washington State must include an Environmental Handling Charge (EHC). The EHCs are paid to PCA by the Program participants and used to fund the Program.
- **Covered Products:** Mercury-containing lights accepted by the Program include compact fluorescent lamps (CFL) of all types and sizes, linear tubes, high-intensity discharge (HID) and other lights used for the purpose of functional illumination in homes, businesses and outdoor stationary fixtures. Collectively, these lights are referred to as “Program Products.” Throughout this Plan the terms “lamp” and “light” are used interchangeably.
- **Covered Entities:** The Program accepts Program Products from Covered Entities, defined as *“...any person who purchased the mercury-containing light at retail and delivers no more than ten mercury-containing lights to a registered collector on any given day or utilizes a registered residential curbside collection program or a mail-back program for collection of mercury-containing lights and discards no more than fifteen mercury-containing lights into those programs on any given day.”* (RCW 70A.505.020(3)).
- **Collection Sites:** The Program has created a network of collection sites throughout the state that includes retailers, utilities, charities, household hazardous waste (HHW) facilities, Moderate Risk Waste (MRW) facilities, collection events, processing facilities, existing residential curbside collection systems and recyclers. See Appendix C for the list of collection sites.
- **Transportation:** Collected lights are packaged in Program-provided, mercury vapor barrier packaging, defined as *“...sealable containers that are specifically designed for the storage, handling, and transport of mercury-containing lights in order to prevent the escape of mercury into the environment (should breakage occur) by volatilization or any other means, and that meet the requirements for transporting by the United States postal service or a common carrier.”* (RCW 70A.505.020(10)). Collected lights are transported to a contracted processor (recycler) using a number of transportation options including mail-back and ground transport.
- **Recycling:** Collected Program Products are collected, transported and recycled as Universal Waste. Recovered mercury is recycled, stored, managed, or disposed by the processor in compliance with applicable local, state, and Federal laws.
- **Outreach and Education:** An ongoing public awareness and education Program including a website and point of sale information has been developed. The Program does *“...promote the safe handling and recycling of mercury-containing lights to the public, including producing and offering point-of-sale educational materials to retailers of mercury-containing lights and point-of-return educational materials to collection locations.”* [RCW 70A.505.030(5)].

1.2 Plan Approval Process

Plan approval steps for this update to the Program Plan are detailed below:

- PCA submitted a draft of the Plan update to Ecology on June 22, 2021.
- Ecology reviewed the draft of the Plan update and provided any comments on behalf of the agency to PCA. No public review process is required for subsequent plan updates.
- PCA submitted a revised version of the Plan, on July 1, 2021, as outlined in the schedule in the following section.

The current Plan can be found on Ecology’s Mercury Lights web site:

<https://ecology.wa.gov/DOE/files/04/046edd84-4930-4966-af97-25425da3b2ce.pdf>

1.3 Plan Updates Required

The law requires, at a minimum, that this Plan be updated, reviewed and approved by Ecology according to the following schedule (RCW 70A.505.040 (4)). Additional updates will be submitted to Ecology for approval as needed. Plan updates will comply with the Program rule (WAC 173-910-440).

TABLE 1: PROGRAM PLAN UPDATES AND TIMELINE

DATE*	PLAN
June 12, 2014	Program Plan Due
August 11, 2014	60 day approval period for the EHC
January 1, 2015	Program start date
January 1, 2017	1 st Program plan update: 2 years from start date
July 1, 2021	2 nd Program plan update: 4 year interval
July 1, 2025	3 rd Program Update: 4 year interval. If the law is on track to sunset, the program will likely forego this update.
July 1, 2025	Program “sunset” takes effect unless extended by Law

**Additional plan updates may be submitted for approval as needed.*

OVERALL PLAN REQUIREMENTS

The plan must include:

- (a) Names and contact information for all participating producers, including names of brands or brand labels used by specific producers;
- (b) The number of mercury-containing lights sold annually in or into the state by producers participating in the plan;
- (c) The types of mercury-containing lights that the program will accept; and
- (d) Details on the management and organization of the stewardship organization.

WAC 173-910-420(1)

2.1 Participating Producers

Definition of Producer

“Producers” are defined in the law (RCW 70A.505.020 (14)) as follows.

A “producer” means a person that:

- (a) Has or had legal ownership of the brand, brand name, or co-brand of a mercury-containing light sold in or into Washington state unless the brand owner is a retailer whose mercury-containing light was supplied by another producer participating in a stewardship program under this chapter;*
- (b) Imports or has imported mercury-containing lights branded by a producer that meets the requirements of (a) of this definition and where that producer has no physical presence in the United States;*
- (c) If (a) and (b) of this definition do not apply, makes or made a mercury-containing light that is offered for sale or sold in or into Washington state; or*
- (d) Sells or sold at wholesale or retail a mercury-containing light and does not have legal ownership of the brand and elects to fulfill the responsibilities of the producer for that product.*

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. The Program is open to all Producers.

Producer Requirements

No producer, wholesaler, retailer, electric utility, or other person may distribute, sell, or offer for sale mercury-containing lights for residential use to any person in this state unless the producer is participating in a product stewardship program under a plan approved by the department for mercury-containing lights. (RCW 70A.505.090).

Producers cannot sell mercury-containing lights into Washington State unless they are participating in an Ecology approved product stewardship plan. Retailers are only considered Producers (and have the obligations of a Producer) if the retailer elects to fulfill the responsibilities of the Producer (RCW 70A.505.020(14)).

Producer Recruitment

Producers participating in the LightRecycle Washington Program are identified in Appendix A. These Producers have designated PCA as the stewardship organization to administer the Program. PCA submitted the Plan and operates the Program on their behalf. PCA conducts active recruitment of non-participating Producers to ensure maximum participation. Any Producers who are not in apparent compliance with the law will be invited to join LightRecycle Washington and pay any outstanding charges that would have been applied since the Program start on January 1, 2015. Ecology will be notified of any new Producers as they join the Program so that Ecology can maintain an updated list of Participating producers on their website. Producers who refuse to participate and are not in compliance with the law will be reported to Ecology.

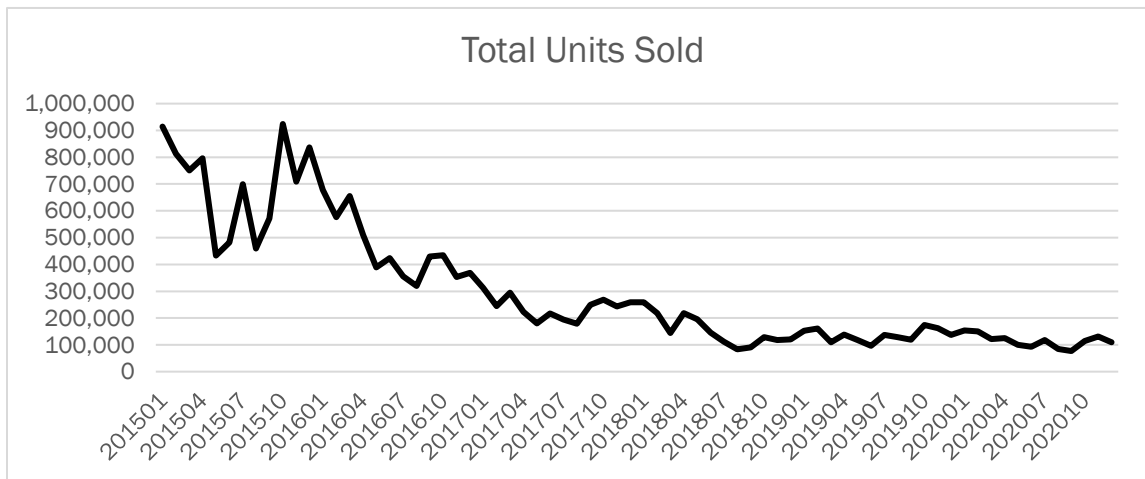
2.2 Mercury-containing Light Sales

Producers participating in the Program are required to report their retail sales of mercury-containing lamps, broken down by lighting type, to the Program on a monthly or quarterly basis depending on the volume of their sales. Distributors and retailers of mercury-containing lights may voluntarily decide to report sales on behalf of Producers. The mercury-containing light sales data provided below is based on Program reported sales data, and is projected using sales trends observed within the program between 2015 and 2020.

The following table shows a summary of the 2015-2020 reported sales, for all mercury-containing lights sold at retail, in or into Washington State:

TABLE 2: MERCURY CONTAINING LIGHTS SOLD AT RETAIL IN WA

Light Type	2015 Sales	2016 Sales	2017 Sales	2018 Sales	2019 Sales	2020 Sales
Fluorescent Tubes (all sizes)	2,185,589	2,002,821	1,706,779	1,400,683	1,032,332	959,870
HIDs	120,102	119,944	93,854	61,671	42,079	42,334
CFLs	6,083,159	3,350,267	1,188,003	372,351	559,229	375,840
Total	8,388,850	5,473,032	2,988,636	1,834,705	1,633,640	1,378,044



2.3 Covered Product Types

The Program collects all mercury-containing lights as defined in 70A.505.020(9) as *lamps, bulbs, tubes, or other devices that contain mercury and provide functional illumination in homes, businesses, and outdoor stationary fixtures*. For greater clarity, the Program collects and manages the following Program Product Categories:

1. Straight Fluorescent Tubes up to 8 feet in length
2. Curve-shaped Fluorescent Tubes including u-shaped, circular and others
3. Compact Fluorescent Lamps (CFL) – All sizes and types, including pin and screw base
4. High Intensity Discharge (HID) – Accepted HID lights include High Pressure Sodium, Mercury Vapor and Metal Halide

As defined in RCW 70A.505.020(3) (a) and (b), Covered Entities are limited to delivering a maximum of 10 lights on any given day to a registered collection site, unless they are participating in mail-back or curbside collection, in which case they may deliver no more than 15 lights per day.

Brands of Non-participating Producers

The Program accepts all brands of lights from the categories cited above, including those from non-participating Producers. Where possible, the Program will identify the Producers of any brands not represented by Program participants and actively recruits them to join the Program. Any Producer not participating in an approved program may be in violation of the Law.

Orphan Products

The Program accepts “orphan products” - defined in the Law to mean a “*mercury-containing light that lacks a producer brand, or for which the producer is no longer in business and has no successor in interest, or that bears a brand for which the department cannot identify an owner*” (RCW 70A.505.020).

2.4 Stewardship Organization

The Program must be operated by a stewardship organization and financed in the manner detailed in the law (RCW 70A.505.050). The Stewardship Organization implements and operates the Program, and manages the Program budget, including revenues, expenses, and Program administration costs, on behalf of the obligated Producers. The Stewardship Organization is also responsible for establishing the Collection Site network and developing outreach and education tools. PCA has been designated as the stewardship organization to operate the Program on behalf of the Participating Producers. PCA is a not-for-profit product stewardship organization incorporated in Oregon and registered in Washington (UBI number 603 226 459). The National Electrical Manufacturers Association (NEMA) provided technical guidance to PCA in developing this Plan. PCA is affiliated with Product Care Association of Canada, which operates product stewardship programs for mercury containing lamps and for other products in Canada. The primary point of contact for PCA on the preparation of this Program is:

Mark Kurschner

President

mark@productcare.org

1-877-592-2972 ext. 201

FINANCING SYSTEM

The plan must include a description of how the program will be funded by the producers and how compensation is paid to collectors, transporters, and processing facilities for all services provided to a plan and that payments to service providers will be made within an appropriate period of time from date of shipment or other time frame defined in contractual arrangements. Stewardship organizations will:

- (a) Provide confirmation that revenues and expenditures applicable to this program will be allocated in accordance with generally accepted accounting principles (GAAP).
- (b) Commit to providing an annual financial audit of the stewardship organization conducted by an independent certified public accountant

WAC 173-910-420(2)

3.1 Program Funding

Budget Development and the Environmental Handling Charge

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 starting on January 1, 2015 (RCW 70A.505.050(3)) and remitted to PCA by the Program participants. PCA consulted with several stakeholders and industry members, including NEMA, in developing the recommended EHC. PCA also consulted with and reviewed the budget in detail with Ecology.

Effective dates of the Environmental Handling Charge (EHC) rates:

- \$0.25 / light from January 1, 2015 – June 30, 2017
- \$0.50 / light from July 1, 2017 – January 31, 2018
- \$0.95 / light effective Feb 1, 2018

The EHC is calculated based on comprehensive budget projections. The budget project revenues from retail mercury-containing light sales and expenses for packaging and shipping materials, recycling, transportation, communication, education and outreach, and administration. The law requires PCA to pay \$3,000 to Ecology on behalf of each participating Producer and this fee is included in the Program Expenses (WAC 173-910-310).

The EHC was set at a rate to cover projected Program expenses, taking into account a number of factors including the expected quantity of Program Products recovered, and at the same time a

projected decline in revenue due to decreasing sales of mercury-containing lights. When the original budget was developed, CFL sales were expected to decline at a rate of 2% per annum for the first 5 years of the Program, due to the shift to Light Emitting Diode (LED) technology. The shift to LED technology has shown to be at a much higher rate than anticipated, resulting in a rapid decline in sales of CFLs and fluorescent lamps. A review of lamp sales trends indicates significant declining sales in all mercury-containing lamp categories.

As a result of the decreased sales of program lamps, program revenue, derived from the EHC applied to the sale of each unit, has declined. In order to sustain the program, EHC rates were increased twice since the implementation of the Program.

Actual sales data reported to the program indicated a much steeper decline in CFL sales than originally anticipated. Unit sales for all program products in the aggregate, as reported to the program in 2020 as compared to 2015 are 83.6% lower. The decreases for each product category over the period 2015-2020 are:

- 93.8% lower for CFLs
- 56% lower for fluorescent tubes sales
- 64.8% lower for HIDs

Appendix B contains the Program budget overview for this program plan update.

Remitting the EHC

The EHC must be included in the final purchase price to the consumer (RCW 70A.505.050 (3)). Each participant in the Program (Producer, or retailer as remitter if applicable) is required to report the number of units by type of Program Products sold during the reporting period through the PCA web-based reporting website and then remit the EHCs to PCA. Policies and guidelines for sales data reporting and EHC remittance are available on the Program website.

According to the law, Producers are obligated to report and remit EHCs to PCA based on the number of Program Products sold in or into Washington State. Producers are required to add the EHC to the cost of Program Products which are supplied to retailers in Washington State and intended for retail sale. In some cases the retailer is better positioned to determine the quantity of Program Products sold in or into Washington and may prefer to report and remit EHCs directly to the Program, rather than to pay the EHCs to their supplier. The retailer can elect to remit the EHCs directly to the Program on the Producer's behalf through a binding remitter agreement and must notify PCA in writing of any such arrangements to ensure all EHCs are properly recorded and remitted. In such a case, the Producer would not invoice the retailer at the time of supply, and instead the retailer would add the EHC to the cost of lights sold at retail, and remit the EHCs directly to the Program on behalf of the Producer.

Remitting retailers are entitled to retain a part of the EHC, as specified by the Program, as a commission to offset any administrative costs associated with the reporting and remittance

of the EHC directly to the Program. Retailers were informed of the amount of the retailer commission before the Program implementation date (RCW 70A.505.050 (3)(b)).

Program Accounting

The system of collection, transportation and processing of Program Products is described below in this Program Plan. The Program has contracts with the transporter and processor, and makes payments in accordance with the terms of those agreements. The Program registers collection sites using an online registration system or if necessary by written agreement. The Program is responsible for the cost of transporting and processing collected Program Products, but does not pay compensation to collectors.

Revenues and expenditures applicable to this Program are allocated in accordance with generally accepted accounting principles (GAAP). An annual financial audit of PCA is conducted by an independent Certified Public Accountant (CPA) in order to provide Ecology with audited annual financial statements. The audited annual financial statements can be found in the Program's annual reports located on the Program website at <https://www.lightrecycle.org/resources/annual-reports/>. Certain confidential business information for Producers and service providers may be withheld or aggregated.

USE OF WA STATE BUSINESSES

The plan must explain how it seeks to use businesses within the state, including utilities, retailers, charities, household hazardous waste facilities, processing facilities, recycling facilities, and collection and transportation services for implementation of the plan including existing curbside collection services and existing mail-back services for implementation of the plan.

WAC 173-910-420(3)

4.1 Washington State Businesses

PCA includes Washington State businesses when soliciting services for Program design, education, collection, transportation, and processing services to implement this Program. The following Washington State businesses are current service providers to the Program.

TABLE 3: WA BUSINESSES THAT PROVIDE SERVICES TO THE PROGRAM

Company	UBI Number	Location	Function
EcoLights Northwest, LLC	601 638 547	Seattle, WA	Light boxes and supplies, spill kits, and recycling services
Total Reclaim Inc.	601 350 223	Kent, WA	Transportation Services

In addition to the businesses listed above, the Program advertises using radio, print and digital media outlets located in Washington State. These types of media and outlets may vary year-to-year.

PCA will continue to utilize Washington State businesses when implementing and operating the Program when it is economically sustainable and feasible to do so. Existing Collection Sites throughout Washington State, including retailers, household hazardous waste facilities and curbside and mail-back services. The Program will also include Washington State associations such as (but not limited to) the Washington Retail Association and the Washington State Recycling Association as part of communication, outreach and education efforts. More detail regarding the outreach to Washington State businesses and stakeholders is provided in the Education, Public Outreach and Marketing section.

PLAN GOALS

The plan will provide goals for the collection of mercury-containing lights for five years of operation, including:

- (a) Total number of mercury-containing lights sold in or into the state;
 - (b) An estimate of the amount of mercury-containing lights available for collection from covered entities; and
 - (c) Annual program goals for collection of mercury-containing lights from covered entities for the next five years
- WAC 173-910-420(4)

5.1 Light Sales

As outlined in Section 2, PCA reported that 1.37 million mercury-containing lights were sold at retail in or into Washington State in 2020. Sales of Program Products for subsequent years have been estimated on the assumption that sales for program lights will continue to according to historic trends.

Based on the assumptions above, the following table shows the 2020 actual sales, and the estimated sales used to calculate the 2021-2025 budget revenue of mercury-containing lights to be sold at retail in or into Washington State:

TABLE 4: MERCURY-CONTAINING LIGHTS SOLD AT RETAIL IN OR INTO WA

	2020	2021	2022	2023	2024	2025 Q1+Q2
Total Program Products Sold	1,378,044	1,107,866	903,489	736,815	600,888	231,267

5.2 Lights Available for Collection

The number of lights actually available for collection as waste lights in a given year is subject to a number of complex and changing factors which determine the usage and lifecycle of a particular light.

As part of the 2017 Program Plan Update, it was assumed that in each subsequent year of the Program, collection volumes would increase by 10% annually, through the expansion and promotion of the collection network, leading to a collection volume of 1,591,908 in 2020.

The following conversion rates, which are consistent with those used in the original Program Plan, were used to estimate the number of units collected

Compact fluorescent lights: 1 light = 0.25 pound

4' Linear fluorescent lights: 1 tube = 0.5 pound

8' Linear fluorescent lights: 1 tube = 1 pound

Residential HID lights: 1 light = 1.5 pounds

As outlined in Section 5.3, the Program will use historic collection volumes, trends and other factors for determining collection targets for 2021-2025.

5.3 Annual Collection Goals

The following table outlines the collection targets for the Program that were established in the 2017 Program Plan Update:

TABLE 5: 2017 PROGRAM PLAN UPDATE COLLECTION TARGETS

Revised Targets	2015 Actual	2016	2017	2018	2019	2020
Total units collected	988,449	1,087,294	1,196,024	1,315,626	1,447,189	1,591,908
Annual Collection Increase		10%	10%	10%	10%	10%

The following table outlines the actual collection quantities and rates of change for the program for 2016 to 2020:

TABLE 6: ACTUAL COLLECTION VOLUMES

Actuals	2015	2016	2017	2018	2019	2020
Actual collection volume	988,449	1,181,616	1,317,790	1,271,304	1,343,229	1,092,317
Actual collection change		19.5%	11.5%	-3.5%	5.7%	-18.8%

Due to the maturation of the program and decreased collection volumes during the COVID-19

pandemic, volumes were significantly lower in 2020. The Program collected 1,092,317 units in 2020, compared to the target of 1,591,908.

As the decreased collection volumes of 2020 were in part the result of the COVID-19 pandemic, the collection volume targets for 2021-2025 will use a baseline the average of the collection volumes for 2019 and 2020. 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.

The Program will strive to achieve the targets listed below. The targets reflect the increasing rate of decline in mercury-containing lamps being sold in the market over the past number of years

TABLE 7: 2021-2025 COLLECTION VOLUME TARGETS

Targets	2019 – 2020 AVERAGED	2021	2022	2023	2024	JAN-JUN 2025
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%

COLLECTORS

The plan must include the following information about collectors participating in the plan:

- (a) The type of collection services in the plan, including curbside collection activities, household hazardous waste facilities, drop-off locations, collection events, and accumulation points for curbside or mail-back collection;
- (b) Registration information for collectors participating in the plan as required in WAC 173-910-520(1), including accumulation points used for curbside or mail-back collection;

- (c) A written statement from each collector ensuring that the collector will comply with the requirements in WAC 173-910-520;
- (d) A statement that collection sites will be:
 - (i) Staffed during operating hours; and
 - (ii) Open during regularly scheduled hours and on an ongoing basis.
- (e) A description of the consideration given to existing residential curbside collection infrastructure and mail-back systems as appropriate collection mechanisms;
- (f) A statement identifying how quickly collection containers will be provided once containers reach capacity;
- (g) A description of the communication and outreach process to answer questions, provide supplies, or provide technical assistance to collectors;
- (h) A description of the technical assistance to be provided to collection sites, including written instructions on how to participate in the program and how to appropriately handle and store mercury-containing lights;
- (i) A description of the packaging and shipping materials that will be used when collecting, accumulating, storing, and transporting mercury-containing lights to minimize the release of mercury into the environment and to minimize breakage; and
- (j) Drafts of spill and release response plan and worker safety plan required in WAC 173-910-520.

WAC 173-910-420(5)

6.1 The Program Collection System

The law requires: (4) *Product stewardship programs shall provide, at a minimum, no cost services in all cities in the state with populations greater than ten thousand and all counties of the state on an ongoing, year-round basis.* (RCW 70A.505.030)

The Program currently has a collection network consisting of 187 advertised sites. There are no charges to Covered Entities that drop off lights at any Program collection location. PCA holds collection events and raises Program awareness of the location of the nearest permanent collection site through advertising in areas not adequately served by permanent collection sites.

Collection sites include retailers, recycling organizations and businesses (both non-profit and for profit), local government Household Hazardous Waste (HHW) or Moderate Risk Waste (MRW) collectors, local government recycling centers, curbside programs, transfer stations and other associations or businesses interested in participating in the Program. These locations include many that had already been collecting mercury-containing lights. All mercury-containing lights that are collected through Program collection sites are picked up and sent to the approved processor where they are recycled. In some areas of Washington, solid waste management companies offer curbside collection of mercury-containing lights, meaning that residents are able to place lamps on or near garbage and recycling containers for pick-up at curbside. Two waste haulers that manage curbside collection programs have joined the Program as part of the collection network.

Mail-back programs are frequently used to create a collection service for mercury-containing lights. Collection containers are sent to designated collection sites. When the containers are full, they are shipped to the processor, usually via common carrier.

The Program accepts lamps collected through curbside collection programs in Washington State up to the limits set forth in the law. LightRecycle Washington provides supplies, transportation and processing at no charge, provided that the waste management company registers with the Program as an authorized collector.

Registered Collection Sites

Appendix C lists cities with populations over 10,000 and the remaining counties that have no cities with populations over 10,000. The minimum requirement of one site per county is fulfilled by the establishment of a collection site in a city in the county with over 10,000 people. If a permanent collection site cannot be placed in a required county or city, PCA will propose to Ecology alternate methods of collecting lights in that area.

As of July 1, 2021, the list of registered Collection Sites includes 187 sites that accept all program products and 66 sites that accept CFLs only, for a total of 253 advertised Collection Sites. The number of registered Collection Sites by category is provided below, and a list of all registered Collection Sites is provided in Appendix C.

- The current collection network consists of:
 - 187 – all program lights
 - 66 – CFLs only
 - 28 – unadvertised

The total number of collection sites continues to slowly decrease but the Program considers that the collection system will continue to comply with the requirements of the law, subject to obtaining approvals for alternative solutions as needed. As mercury lamps become less prominent, there is less interest in seeing the need to participate as a collection site.

In addition to collecting mercury-containing lights, collection site operators:

- Request transportation for filled containers of lights
- Re-order supplies needed to store and transport lights
- Are provided with LightRecycle Washington operation information and marketing materials

Collection sites can communicate with the Program by:

- Completing an online form or by logging in to the Website in the Collection Site Support Center at <https://www.lightrecycle.org/collection-site-support-center/>
- Calling the toll-free telephone number for the Program
- Emailing individual program staff or info@lightrecycle.org

Collection sites are required in every county and every city of 10,000 or more people. In some areas, no retailer or municipality that was contacted was willing to act as a dedicated collection site. In these cases alternative methods are used, such as holding collection events.

The following options for fulfilling requirements in areas without a dedicated collection site will be used:

- Holding one or more collection events in a given year.
- Raising awareness of dedicated collection sites in communities that are adjacent to the actual location of the event or collection site.

Collection Site Supplies and Information

Collection sites are provided with the supplies and information they need to safely collect, store and prepare for the shipment of mercury-containing lights.

Mercury vapor barrier packaging is required for containers that are used to store and transport mercury-containing lights. These containers include a mercury vapor barrier as described in RCW 70A.505.020(10) that meets the requirements for transport by the United States Postal Service

or a common carrier, such as FedEx. The containers themselves are primarily cardboard boxes that have been designed to hold various types and sizes of lights in quantities that can be handled safely and shipped economically.

Every LightRecycle Washington collection site is provided with a printed copy of the Collection Site Guidelines. This document provides detailed instructions on how to operate a collection site including:

- (a) Appropriate handling and storage of mercury-containing lights;
- (b) Logistics management for the pick-up of filled collection containers and the drop-off of replacement containers;
- (c) A communication and outreach process to answer questions, provide supplies, or provide technical assistance to collectors;
- (d) Technical assistance to collection sites;
- (e) Packing and shipping materials;
- (f) Spill and release response plan;
- (f) Worker safety plan; and,
- (g) Marketing materials (posters, brochures...) available to collection sites.

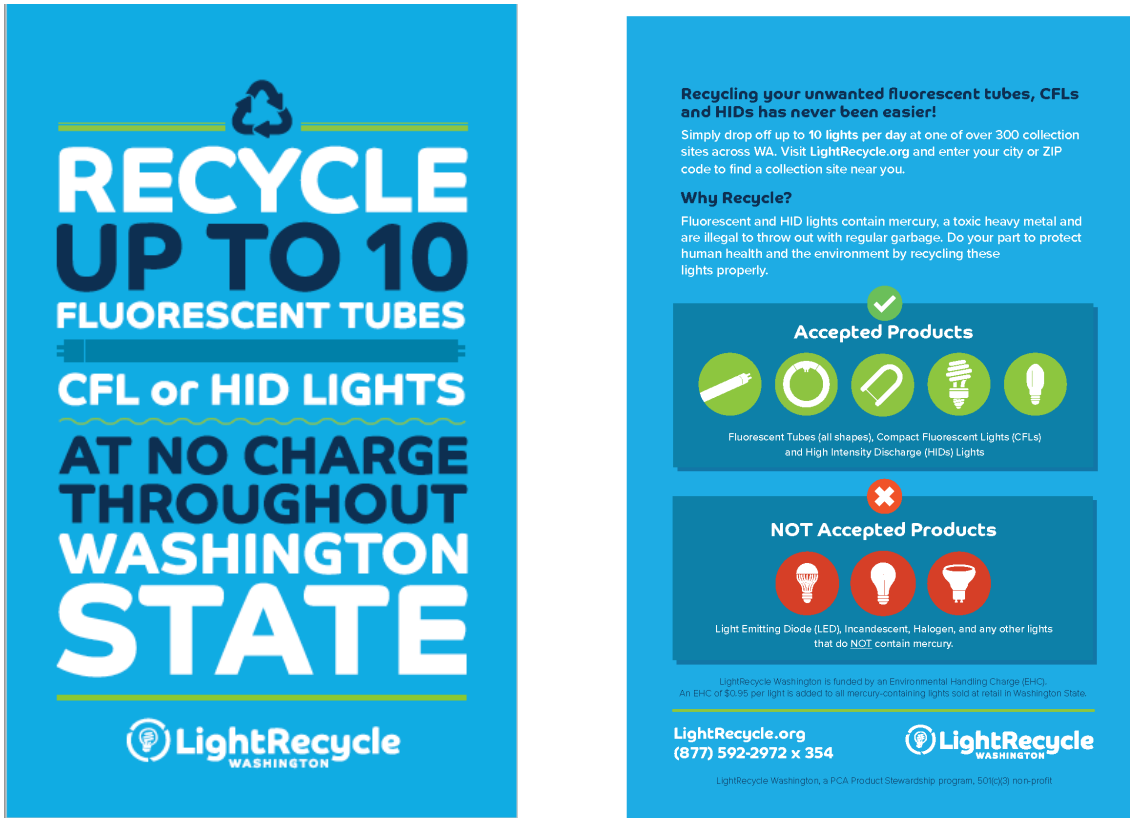
The Program may modify the Collection Site Guideline, supplies and marketing materials over the course of the Program. When the Collection Site Guideline is revised, Collection Sites are notified and provided with an updated copy. The Collection Site Guideline can also be downloaded at this Web address:

<http://www.lightrecycle.org/wp-content/uploads/2016/11/LRW-Collection-Site-Guidelines.pdf>

Marketing materials are provided on an ongoing basis at no cost to collection sites. Materials are shipped to collection sites when they register with the Program and can be re-ordered at no cost at any time. The initial set of materials can include:

- “Recycle Here” posters featuring images of mercury-containing lights and basic Program information.
- “Recycle Here” banners for facilities requiring outdoor signage.
- Rack cards - 5 x 8 inch cards with Program details.

The following graphic shows both sides of the rack card (5" x 8"):



Broken Mercury-containing Lights

Using safe handling and management practices for lights helps to avoid breakage. However, the fragile nature of lights indicates that collection sites must be prepared to manage broken lights. Broken lights can come from two sources:

1. Collected lights that are broken after being dropped off at the collection site.
2. Residents dropping off broken lights in a sealed bag or container.

A broken light clean-up kit is provided to all collection sites for lights that are broken after being dropped off. Clean-up supplies can be re-ordered at no cost to collection sites with other Program supplies.

Broken lights that have been placed in a sealed container may be included with lights that have been collected for the Program. They are then transported and recycled with other Program materials.

The Washington State Department of Ecology broken light clean-up procedure is available on the Program website and in the Collection Site Guidelines. The key elements of this procedure are as follows:

How to Clean up a Broken Fluorescent Bulb

Be careful not to break fluorescent bulbs. However, if you do break a fluorescent or other mercury-containing bulb, do not panic, and follow the following instructions:

Avoid breathing vapors or touching broken materials.

Do not vacuum or sweep.

1. Open windows to vent vapors for at least 15 minutes. Leave the area during this time.
2. Use stiff paper or cardboard to pick up large pieces.
3. Use duct tape to pick up small pieces and powder.
4. Wipe the area clean with a damp paper towel or wet wipe.
5. Place all materials in a sealed container, preferably made of glass and with a good lid.
6. Immediately remove the container from the home.
7. Wash your hands.
8. Dispose of at your local hazardous-waste facility—not in your trash. (Contact 1-800-RECYCLE or <https://www.lightrecycle.org> for locations.)

It may be a good idea to cover porous flooring with a sheet of plastic when changing bulbs. Some people choose to wear nitrile or neoprene gloves and/or a chemically protective mask, but there is no evidence that this is necessary.

<https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Lights-lamps>

6.2 Registration Information

Program information for interested collection sites is available on the LightRecycle Washington website at www.lightrecycle.org. PCA will not directly own or manage collection sites.

Collection sites are registered using a streamlined process, making it easy to sign up while meeting all the requirements set forth in the law and rules. Registration can be completed by completing an online form at www.lightrecycle.org/register/ or signing a written agreement.

As part of the registration process, collectors are required to verify that they comply with the requirements in WAC 173-910-520; including confirmation that collection sites will be open and staffed during regularly scheduled hours and on an ongoing basis. Collection sites are not allowed to crush or process collected lights. More detailed information on operating procedures for Collection Sites can be found in the Collection Site Guideline referenced above. The

registration form required to be filled out by all participating Collection Sites is included in Appendix E.

6.3 Universal Waste

The Program collects, transports and manages mercury-containing lights as Universal Waste Lamps. Collection sites are Small Quantity Handlers of Universal Waste (SQHUW) (WAC 173-303-573) and the frequency of pick-up will ensure all sites maintain this regulatory status. As SQHUW, Collection Sites can store up to 2200 pounds of mercury-containing lights at any one time, however collected lights can be picked up upon request or mailed to the processor as frequently as needed. There are no registration requirements for SQHUW's; however, WAC 173-303-573 provides standards and procedures for managing mercury-containing lights. The Program will comply with Universal Waste Regulations but may have additional requirements to comply with Rules established in WAC 173-303-190 (Preparing Dangerous Waste for Transport).

As mentioned above, the Collection Site Guideline is provided to Collection Sites and can be downloaded from the LightRecycle Washington website.

TRANSPORTERS

The plan must include information about transporters participating in the plan, including:

- (a) Registration information for transporters participating in the plan, including names, addresses, and contact information.
- (b) A written statement from each transporter ensuring that the transporter will comply with the requirements in WAC 173-910-530.

WAC 173-910-420(6)

7.1 Program Transporter

The Program transporter for direct pick-up from Collection Sites is Total Reclaim Inc. Total Reclaim complies with the requirements of WAC 173-910-530 and is a registered hauler of recyclables as required by Chapter 173-345 WAC.

Registration information for Total Reclaim is provided below.

Total Reclaim Inc.

Common Carrier UTC Permit # MC-661411-C

US DOT Haz Mat # 820837

Contact: Davrin Miller

Address: 7021 South 220th Street, Kent, Washington 98032

Phone: 206.388.5326

PCA has contracted with Total Reclaim as the Transporter for the Program. Total Reclaim may sub-contract with third party transporters at their discretion, but must ensure that any additional transporters used meet the requirements of WAC 173-910-530. A contingency plan is included in the contract outlining procedures to follow in the event Total Reclaim cannot operate or provide services to the Program. The Program may add or change Transporters during the course of the approved Program, subject to approval by Ecology.

Collected Lights that are sent to the processor will be delivered by a common carrier (such as FedEx) that meets the requirements for registered shippers of recyclables. As described in Section 1.1, Collected lights will be packaged in Program provided Mercury vapor barrier

packaging, defined as “...sealable containers that are specifically designed for the storage, handling, and transport of mercury-containing lights in order to prevent the escape of mercury into the environment (should breakage occur) by volatilization or any other means, and that meet the requirements for transporting by the United States postal service or a common carrier.” (RCW 70A.505.020(10)). Shipping costs will be covered by the Program.

Provided below is copy of the written statement that Total Reclaim has provided to PCA acknowledging the need to comply with the requirements in WAC 173-910-530.



May 21st, 2021

Mr. Mark Kurshner
President
Product Care Association
105 West 3rd Avenue
Vancouver BC, V5Y 1E6

RE: WAC 173-910-530 Transporter Requirements – Mercury – Containing Lights Product Stewardship Program

Mr. Kurshner:

I am writing to confirm that Total Reclaim, Inc. complies with the requirements contained in WAC 173-910-530, as well as other requirements of the chapter.

Thank you again for the opportunity to continue participating in this important recycling program.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bobby Farris', is written over a white background.

Bobby Farris
CEO
Total Reclaim, Inc.

PROCESSING FACILITIES

The Plan must include information about processing facilities participating in the plan, including:

(a) Registration information for processors participating in the plan, including names, addresses, contact information and hours of operation;

(b) A description of the methods used to process mercury-containing lights at each processing facility in the program; and

(c) Compliance audit reports for each processing facility participating in the plan completed by a qualified third party. The compliance audit will research, review, and report on the following:

(i) Compliance with all federal, state, and local requirements and, if it exports, those of all transit and recipient countries that are applicable to the operations and transactions in which it engages related to the processing of mercury-containing lights, components, parts, and materials and disposal of residuals. These include, but are not limited to, applicable legal requirements relating to:

(A) Waste and recyclables processing, storage, handling, and shipping;

(B) Air emissions and waste water discharge, including storm water discharges;

(C) Worker health and safety; and

(D) Trans-boundary movement of mercury-containing lights, components, materials, waste, or scrap for reuse, recycling, or disposal.

(ii) Information on financial penalties, regulatory orders, or violations the processing facility received in the previous three years; and

(iii) Any other information requested by the department.

WAC 173-910-420(7)

8.1 Program Processor

The Processor for the Program is Ecolights Northwest. The Program has contracted with EcoLights as the recycling processor for the Program.

Registration information for EcoLights is provided below.

EcoLights Northwest LLC

Contact: Davrin Miller

7021 South 220th Street,

Kent, Washington 98032

Phone: 206.388.5326

Hours: Monday – Friday 7:30 – 4:30

Collected Program Products are recycled to the maximum extent possible. Mercury-containing lights are crushed by the processor in a specialized machine for processing lamps that operates under negative pressure. The crushed lamps are separated into component parts; glass, aluminum endcaps, and mercury phosphor powder, for shipment to downstream recycling vendors. The glass is used as aggregate in concrete and other construction-related uses, aluminum end-caps are sold to scrap aluminum buyers, and the mercury phosphor powder is shipped to an EPA regulated and approved mercury retort for purification. Remaining phosphor powder is shipped for recovery of rare earth elements contained in the powder. Nearly all of the non-hazardous Program material, including glass and aluminum, is recycled.

A contingency plan has been included in the contract outlining procedures to follow in the event EcoLights Northwest cannot operate or provide services to the Program. The Program may add or change Processors during the course of the approved Program, subject to approval by Ecology.

Ecolights Northwest has provided PCA and Ecology with a Compliance Audit Report completed by a qualified third party that satisfies all the requirements of WAC 173-910-420(7)(c) and was submitted to Ecology.

RECORD KEEPING

The plan must include procedures for how the stewardship organization will collect and maintain records to meet and demonstrate compliance with the recordkeeping requirements of this chapter. At a minimum, the stewardship organization will track the following information:

- (a) Total number of mercury-containing lights sold in or into Washington State for all producers participating in the plan.
- (b) The types of mercury-containing lights collected by the program.
- (c) List of all collection sites and collection services, including curbside and mail back.
- (d) Identification of transporters and processing facilities participating in the plan.
- (e) Mercury-containing lights collected, transported, and processed for the plan, including:
 - (i) Total mercury-containing lights, by weight in pounds, collected from individual collection sites collection services, curbside and mail back.
 - (ii) Final destination and quantities of lights processed and disposed.
- (f) Education efforts for consumers, retailers, utilities, collectors, transporters, and processors, including assessments of the effectiveness of these efforts.
- (g) Efforts to promote the mercury-containing lights collection program.

WAC 173-910-420 (8)

9.1 Record Keeping Overview

PCA collects and maintains records relating to Program activity in order to demonstrate compliance and substantiate Program performance improvement. The information submitted to Ecology in the required Annual Report includes:

- (a) Annual Mercury-containing Light Sales in Washington State by participating Producers - See Section 5(a) of this Plan.
- (b) List of registered collection sites and locations, compared to the required locations by County and City. (see Appendix C)
- (c) Identification of transport, processing, and recycling services (see Sections 7 and 8).
- (d) Quantity and types of Program Products collected, transported, and processed. The total number of mercury-containing lights, estimated by weight in pounds using standard conversion factors (see Section 5(b)), collected from individual collection sites, collection

services, curbside and mail back. It will also track the final destination of all lights recycled.

- (e) The Program will document education and outreach efforts for consumers, retailers, utilities, collectors, transporters and processors including assessments of the effectiveness of these efforts. Examples of education and outreach materials to promote the Program are included in Section 11.
- (f) The annual report will identify the primary processor(s) for all lights processed through the Program as well as quantities and management method (recycling and disposal) for lighting components (aluminum, phosphor, mercury, glass).

Quantities of Program Products are reported by Producers and Retailers to the Program monthly or quarterly through an online portal and stored in a secure database. Collection information is also reported by the processor to the Program on a quarterly basis and subject to verification by PCA. Other Program records such as registered Collection Sites and education and outreach efforts will be maintained by PCA. Informal reports summarizing collected Program information will be provided to Ecology on a quarterly basis.

EDUCATION, PUBLIC OUTREACH AND MARKETING

A description of how the plan will meet the public education, outreach and marketing requirements, including:

- (a) How it will provide information about where and how to deliver their mercury-containing lights to a product stewardship program collector at the end of the product's life;
- (b) Providing a web site and toll-free number that gives information about the product stewardship program in sufficient detail regarding how and where to drop off mercury-containing lights into the product stewardship program, and collaborating with the department to provide information necessary to keep the 1-800-RECYCLE online data base up to date;
- (c) Describing the outreach method or methods used;
- (d) How it will ensure outreach to the public throughout the state;
- (e) How it will provide outreach materials for educating the public to all collectors used by the plan;
- (f) Explaining how the plan will coordinate education, public outreach, and marketing with other approved product stewardship plans;
- (g) Explaining how the plan will coordinate on education, public outreach, and marketing with retailers, distributors, wholesalers, and electric utilities; and
- (h) Explain the public review process implemented by the stewardship organization, the public comments received by the stewardship organization, and how the stewardship organization addressed those comments.

WAC 173-910-420(10)

10.1 Overview

At the initial program launch, PCA developed a communication strategy designed to:

- Increase the number of mercury-containing lights recycled in Washington
- Publicize
 - The network of convenient, no-charge drop-off sites throughout the state
 - The legal obligation to properly recycle mercury-containing lights
 - The environmental benefits of recycling mercury-containing lights

- Comply with applicable Washington regulations

However, with declining revenue, and declining demand for service, combined with the sunset date approaching, the program will be limiting the communication activities to:

- Program website, www.lightrecycle.org, and provides collection site materials (collection site signage and information cards) upon request.
- Print ads required for compliance for areas with no permanent collection sites.
- Making available ongoing supply of marketing material to collection sites.

10.2 LightRecycle Washington Website

The website www.lightrecycle.org highlights key Program information such as the types and quantities of lights that can be recycled. The Collection Site locator web application is a key component of the website and a link to it is prominently displayed on all web pages. The locator app allows users to enter a zip code or other information and then display LightRecycle Washington collection sites in the area both in text and on a map.

Other website content includes contact forms and information such as:

- Program overview with links to the law and related information
- The categories of lights that are accepted in the Program at no charge
- How to find a Collection Site for mercury-containing lights
- Drop-off limits for Washington residents
- The hazards mercury can pose to human health and the environment
- Proper handling and recycling methods for mercury-containing lights
- The economic and environmental benefits of using and recycling mercury-containing lights
Consumer FAQ
- Becoming a Collection Site
- Downloadable brochure
- Program contacts, including a toll-free telephone number
- Recycling products other than mercury-containing lights in Washington State through the 1-800-RECYCLE toll-free information line

Collection Sites are able to log into the website to perform certain functions including:

- Request transportation of Program materials
- Order Program supplies and marketing materials
- View previous requests for transportation, supplies and other materials

- Instructional video explaining the LightRecycle program to new/potential collection sites (made in conjunction with Ecology)



The website also contains information for Producers and retailers to provide guidance on their obligations within the law, and information for how non-participating producers can register with the Program.



Upgrades and changes to the website will be performed on an as-needed basis throughout the life of the Program. A toll-free number is displayed on the website and provided on printed marketing materials.

10.3 Program Branding

The following Logo, tagline and images will be used to maintain consistent Program branding.

TABLE 8: PROGRAM BRANDING

LOGO AND GRPAHIC IMAGE ELEMENTS	DESCRIPTION
	<p>Logo always features the words “LightRecycle Washington” and a CFL icon with a circular arrow around it. The logo and icon are available in a variety of file formats for use in different applications.</p>
	<p>Bulb character example: CFL (Compact Fluorescent Light)</p>

LOGO AND GRAPHIC IMAGE ELEMENTS	DESCRIPTION
	Bulb character example: Fluorescent Tubes
	Bulb character example: HID (High Intensity Discharge)

10.4 Program Communications

The communications strategy is intended to maintain program reach and awareness through a mix of traditional and digital advertising methods as well as promotion with collection and municipal partners.

The majority of the advertising is intended to drive the audience directly to collection sites or to the Program website. There they can use the collection site locator to identify their most convenient drop-off point.

Some of the communications activities may include:

- Program details and contact information is provided on the Program website
 - LightRecycle.org
 - info@lightrecycle.org

- Toll-free telephone: (877) 592-2972

Due to declining revenues, in 2018 program communications were modified to include only print advertising where required (see below), to supply collection sites with materials, and to maintain a website and social media (managed internally by PCA staff).

Print Advertising

- Print ads are used in areas without a permanent collection site in order to:
 - To raise awareness about a collection event
 - To raise awareness of a dedicated collection site in a nearby area

Collection Site Materials

- Collection Site Signage:
 - The collection network of registered sites were provided “Recycle Here” posters and/or vinyl banners (outdoor) upon request.
- Information Cards (5” x 8”)
 - Distributed to collection sites, retailers, municipal locations and to solid waste departments for distribution at fairs and festival

Print Advertising Examples (reduced from actual size):





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
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lightrecycle.org

 LightRecycle
WASHINGTON

10.5 Public Review Process

As required in the rules (WAC 173-910-450), a public review process was held as part of the development of the original Program Plan in 2014. The Department of Ecology posted the original Program Plan online for review by all stakeholders during a three-week period during June and July 2014. Ecology and PCA sought and gathered numerous comments throughout the state from lighting producers, policy experts, waste management professionals, Department of Ecology personnel and others. The comments were then organized by section and summarized in cases where multiple stakeholders made similar comments about a particular section or aspect of the Program Plan. Meetings, phone calls and conference calls were held between PCA and Ecology to discuss comments on the plan. Every comment was considered and many were specifically addressed in subsequent revisions of the Program Plan. No subsequent public review was required in 2021 for the development of this Plan.

APPENDIX A - PARTICIPATING PRODUCERS AND BRANDS

The following list identifies the Producers who have registered with the Program as of the date of this Program Plan. The current list of Participating Producers can be found at the following link:

<https://ecology.wa.gov/DOE/files/34/34620ac6-aae5-466f-b4ac-139e386fe3b9.pdf>

List of Participating Producers

TABLE 9: LIST OF PARTICIPATING PRODUCERS

	Company Name and Website	Phone	Address
1	Ace Hardware Corporation www.acehardware.com	630-990-6600	2200 Kensington Court Oak Brook, IL 60523
2	Apollo Horticulture www.apollohorticulture.com/	909-979-7392	2665 Pomona Blvd Pomona, CA 91768
3	Coleman Cable Inc. www.colemancable.com	800-323-9355	1530 Shields Drive Waukegan, IL 60085
4	Dolan Northwest LLC www.seattletesting.com	503-972-5234	222 2nd Avenue Ext. South Seattle, WA 98134
5	Elong International USA Inc. (representing Do it Best Corp) www.elonginternational.com	972-247-7996	2425 McIver Lane #150 Carrollton, TX 75006
6	Energetic Lighting (Yankon Industries Inc.) www.energeticlighting.com	909-591-2345	13445 12th Street Chino, CA 91710
7	Eye Lighting International of North America, Inc. www.eyelighting.com	440-350-7000	9150 Hendricks Rd. Mentor, OH 44060
8	Feit Electric Company, Inc. www.feit.com	562-463- 2852	4901 Gregg Rd. Pico Rivera, CA 90660
9	General Electric Lighting www.gelighting.com	216-266-9729	1975 Noble Rd East Cleveland, OH 44112
10	Halco Lighting Technologies www.halcolighting.com	770-242-3612	PO Box 2834 Norcross, GA 30091-2834
11	Hawthorne Hydroponics LLC www.hawthorne-gardening.com www.sunlightsupply.com	360-883-8846	3204 NW 38 th Circle Vancouver, WA 98660

	Company Name and Website	Phone	Address
12	LEDVANCE Corp www.ledvance.com	978-570-3000	200 Ballardvale Street Wilmington, MA 01887
13	Maxlite Inc. www.maxlite.com	973-244-7300	12 York Ave. West Caldwell, NJ 07006
14	OttLite Technologies, Inc www.ottlite.com	800-842-8848	220 W 7th Ave, Suite 100 Tampa FL 33602
15	Philips Lighting North America Corporation www.usa.philips.com	202-962-8567	200 Franklin Square Somerset, NJ 08873
16	Satco Products, Inc. www.satco.com	631-243-2022	110 Heartland Blvd. Brentwood, NY 11717
17	Technical Consumer Products Inc. www.tcpi.com	800-324-1496	325 Campus Drive Aurora, OH 44202
18	Ushio America, Inc. www.ushio.com	714-236-8600	5440 Cerritos Avenue Cypress, CA 90630
19	Venture Lighting International, Inc. www.venturelighting.com	800-451-2606	32000 Aurora Road - Suite A Solon, Ohio 44139
20	Westinghouse Lighting Corporation www.westinghouselighting.com	215-671-2000	12401 McNulty Road Philadelphia, PA 19154

List of Brands Represented

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. Digimax
14. Do it Best
15. DOLLAR GENERAL
16. Ecosmart
17. Eiko
18. Energetic Lighting
19. Energy Advantage
20. Energy Saver
21. ENERGY SMART
22. EVERYDAY LIVING
23. Eye
24. Eye Hortilux
25. Feit Electric
26. Finally
27. GE
28. GE Lighting Linear Fluorescent and CFLs
29. Halco
30. Master
31. Master SDW White SON
32. MasterColor
33. MaxLite
34. Megalowmart
35. OSRAM
36. OttLite
37. ParPro
38. Philips
39. ProLime
40. Purple Reign
41. Safeway – Bright Green
42. Satco
43. Satco / HYGRADE
44. SMART LIVING
45. Spectralux
46. Sunmaster
47. Super Sprouter
48. SYLVANIA
49. TCP
50. Tospo Brand Lamps
51. TuffGuard
52. Ultra Sun
53. Urban Farmer
54. Ushio
55. Utilitech
56. Venture Lighting
57. Walgreen - Living Solutions
58. Western Family
59. Westinghouse
60. Woods
61. Zoo

APPENDIX B – BUDGET OVERVIEW

TABLE 10: BUDGET OVERVIEW

PCAPSI USA	2021	2022	2023	2024	2025 Jan-Jun	Total 5 Year
EHC (fee rate)	\$0.95	\$0.95	\$0.95	\$0.95	\$0.95	
Program Revenue	\$1,046,034	\$853,064	\$695,692	\$567,352	\$218,360	\$3,380,502
Program Expenses						
Operational Costs	805,816	841,272	870,716	901,191	521,488	
Communications	3,000	6,000	6,000	6,000	10,000	
Administration	133,443	103,983	133,164	104,322	112,630	
Government Costs	23,994	60,000	60,000	60,000	60,000	
Total program expenses	\$966,252	\$1,011,255	\$1,069,880	\$1,071,513	\$704,118	\$4,823,018
Surplus/(Deficit)	\$79,782	(\$158,191)	(\$374,188)	(\$504,161)	(\$485,758)	
Cumulative Reserve	\$1,569,795	\$1,411,604	\$1,037,416	\$533,255	\$47,497	

APPENDIX C – COLLECTION SITE LOCATIONS

Collection Site Location Requirements

The following table shows the number of registered Collections Sites by county and city. The number of Sites meeting the requirements of the law for Collection Sites (1 per county and 1 per city with a population over 10,000) are under the heading "# Sites (Accepts ALL)".

The number of Sites under the heading "# Sites, (CFL Only)" do not meet the collection site requirement in the law since they accept CFLs only, not all Program Products.

Locations with the letters "ALT" under the heading "Alternative Collection" do not have a dedicated collection site and are serviced with collection events or other alternative collection methods. (This is described in section 6.1 The Program Collection System).

TABLE 11: COLLECTION SITE LOCATION REQUIREMENTS

	County	City	Size	# Sites (Accepts ALL)	# Sites (CFL Only)	Alternative Collection
1	Adams	county location	no city > 10K	1		
2	Asotin	county location	no city > 10K	1		
	Benton	[Benton]	< 10K	1		
3	Benton	Kennewick	84,960	2		
4	Benton	Richland	58,550	2		
5	Benton	West Richland	15,710	1		
	Chelan	[Chelan]	< 10K	1		
6	Chelan	Wenatchee	35,140	1		
	Clallam	[Sequim]	< 10K	1		
7	Clallam	Port Angeles	19,710	2		
8	Clark	Battle Ground	22,180	1		
9	Clark	Camas	25,140			ALT
10	Clark	Vancouver	189,700	3	2	
11	Clark	Washougal	16,680	2		
12	Columbia	county location	no city > 10K	1		
13	Cowlitz	Kelso	12,340			ALT
14	Cowlitz	Longview	38,350	2		

	Cowlitz	[Castle Rock]	< 10K	1		
	Cowlitz	[Woodland]	< 10K	1		
15	Douglas	East Wenatchee	13,740			ALT
	Douglas	[Bridgeport]	< 10K	1		
	Douglas	[Rock Island]	< 10K	1		
	Douglas	[Mansfield]	< 10K	1		
	Douglas	[Waterville]	< 10K	1		
16	Ferry	county location	no city > 10K	1		
17	Franklin	Pasco	77,100	1		
18	Garfield	county location	no city > 10K	1		
19	Grant	Moses Lake	24,620	1		
	Grant	[Mattawa]	< 10K	1		
20	Grays Harbor	Aberdeen	16,890	1		
	Island	[Camano Island]	< 10K	2		
	Island	[Coupeville]	< 10K	1		
	Island	[Langley]	< 10K	1		
21	Island	Oak Harbor	22,910	2		
	Island	[Freeland]	< 10K	1		
22	Jefferson	county location	no city > 10K	3		
23	King	Auburn	71,960		1	ALT
24	King	Bellevue	148,100	5	4	
25	King	Bothell	29,730	2	2	
26	King	Burien	52,300	2	1	
27	King	Covington	20,530			ALT
28	King	Des Moines	32,260		2	ALT
29	King	Edmonds	40,727	2		
30	King	Enumclaw	21,610	1		
31	King	Federal Way	98,340	1		
32	King	Issaquah	38,690	1	1	
33	King	Kenmore	23,450			ALT
34	King	Kent	130,500	2	1	
35	King	Kirkland	90,660	2	5	
36	King	Lake Forest Park	13,280	2		
37	King	Maple Valley	26,630	1	1	
38	King	Mercer Island	24,690	1		
39	King	Newcastle	12,870	1		
	King	[North Bend]	< 10K	1	1	
40	King	Redmond	69,900	1	1	
41	King	Renton	105,500	4	2	
42	King	Sammamish	65,100	1		
43	King	SeaTac	29,180	1		
44	King	Seattle	761,100	23	24	

45	King	Shoreline	56,980	3	1	
46	King	Snoqualmie	13,680	1		
47	King	Tukwila	21,360	3	1	
	King	[Vashon]	< 10K	2		
48	King	White Center	13,495	1		
49	King	Woodinville	12,790	1		
50	Kitsap	Bainbridge Island	25,070	1		
51	Kitsap	Bremerton	41,750	2		
52	Kitsap	Port Orchard	14,770	2		
53	Kitsap	[Poulsbo]	11,550			ALT
	Kitsap	[Silverdale]	< 10K	1		
54	Kittitas	Ellensburg	20,640	2		
55	Klickitat	county location	no city > 10K	4		
56	Lewis	Centralia	17,290	1		
57	Lincoln	county location	no city > 10K			ALT
58	Mason	county location	no city > 10K	2		
59	Okanogan	county location	no city > 10K	4		
60	Pacific	county location	no city > 10K	1		
61	Pend Oreille	county location	no city > 10K			ALT
62	Pierce	Bonney Lake	21,390			ALT
	Pierce	[Joint Base Lewis/McChord]	209,000	1		
63	Pierce	Lakewood	60,030	2		
64	Pierce	Puyallup	42,700	2		
	Pierce	[Sumner]	10,360	1		
65	Pierce	Tacoma	213,300	3	1	
66	Pierce	University Place	33,310	1		
	Pierce	[Graham]	< 10K	1		
	Pierce	[Gig Harbor]	11,240	1	1	
67	San Juan	county location	no city > 10K	3	2	
68	Skagit	Anacortes	17,830	1		
69	Skagit	Mount Vernon	36,050	3		
70	Skagit	Sedro-Woolley	11,890	1		
	Skagit	[Burlington]	< 10K	2		
71	Skamania	county location	no city > 10K	4		
72	Snohomish	Arlington	20,600	2		
73	Snohomish	Edmonds	42,470	1		
74	Snohomish	Everett	112,700	8	4	
75	Snohomish	Lake Stevens	34,150	1	1	
76	Snohomish	Lynnwood	40,690	2	2	
77	Snohomish	Marysville	69,180	3		
78	Snohomish	Mill Creek	20,590	1		

79	Snohomish	Monroe	19,800	2	1	
80	Snohomish	Mountlake Terrace	21,660	2	1	
81	Snohomish	Mukilteo	21,360	1		
	Snohomish	[Snohomish]	10,240	1	1	
	Snohomish	[Stanwood]	< 10K	1	1	
	Snohomish	[Sultan]	< 10K	1		
	Snohomish	[Granite Falls]	< 10K	1		
	Snohomish	[Darrington]	< 10K	1		
82	Spokane	Cheney	12,640	1		
83	Spokane	Spokane	223,600	6		
84	Spokane	Spokane Valley	97,490	3		
	Spokane	[Colbert]	< 10K	1		
	Spokane	[Deer Park]	< 10K	1		
85	Stevens	county location	no city > 10K	2		
86	Thurston	Lacey	52,910	1		
87	Thurston	Olympia	54,150	2		
88	Thurston	Tumwater	24,600	1		
89	Wahkiakum	county location	no city > 10K			ALT
90	Walla Walla	Walla Walla	34,400	2		
91	Whatcom	Bellingham	91,610	3	1	
	Whatcom	[Blaine]	< 10K	2		
92	Whatcom	Ferndale	14,600	1		
93	Whatcom	Lynden	14,800	2		
94	Whitman	Pullman	34,850	2		
95	Yakima	Grandview	11,230	1		
96	Yakima	Sunnyside	17,250	1		
97	Yakima	Yakima	95,490			ALT
				215	66	

Registered Collection Sites

As of June 1, 2021, the following Collection Sites have registered with the Program.

Registered Collection Sites (by county and city) who accept all Program Products:

TABLE 12: 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	102 Cowlitz St West	Castle Rock	WA	98611	Cowlitz

	Hardware					
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	Crescent Lighting	12629 NE 85th Street	Kirkland	WA	98033	King
54	Enumclaw Recycling and Transfer Station	1650 Battersby Ave E	Enumclaw	WA	98022	King
55	Factoria Household Hazardous Waste Drop Off Site	13800 SE 32nd St.	Bellevue	WA	98005	King
56	Fairwood Ace Hardware	14100 SE Petrovitsky Road	Renton	WA	98058	King
57	Hero Ace Hardware	1915 4th Ave	Seattle	WA	98101	King
58	Highlands Ace Hardware	4601 NE Sunset Blvd	Renton	WA	98059	King
59	Island Home Center & Lumber	17633 97th Pl SW	Vashon	WA	98070	King
60	Johnsons Home and Garden	26625 Maple Valley Black Diamond Rd.	Maple Valley	WA	98038	King
61	Junction True Value Hardware	4747 44th Ave S.W.	Seattle	WA	98116	King
62	Lake City Tweedy & Popp Hardware	3040 NE 127th St.	Seattle	WA	98125	King
63	Madison Park Hardware	1837 42nd Avenue East	Seattle	WA	98112	King
64	Maple Leaf Ace Hardware	9000 Roosevelt Way NE	Seattle	WA	98115	King
65	McLendon Hardware	23662 104th Ave. SE	Kent	WA	98031	King
66	McLendon Hardware	440 Rainier Ave. S	Renton	WA	98057	King
67	McLendon Hardware	10210 16th Ave. SW	White Center	WA	98146	King
68	McLendon Hardware	17705 130th Ave. NE	Woodinville	WA	98072	King

69	Mercer Island True Value Hardware	7707 SE 27th St. Suite 110	Mercer Island	WA	98040	King
70	North Bend Ace Hardware	330 Main Ave. S	North Bend	WA	98045	King
71	North Seattle Household Hazardous Waste Collection Facility	12550 Stone Avenue North	Seattle	WA	98133	King
72	Northshore Ace Hardware	35419 21ST Ave. S.W.	Federal Way	WA	98023	King
73	Northshore Senior Center	10201 E Riverside Dr.	Bothell	WA	98011	King
74	Pacific Supply	1417 12th	Seattle	WA	98122	King
75	Recolgy CleanScapes	317 NW Gilman Road #22	Issaquah	WA	98027	King
76	Recolgy CleanScapes	15235 Aurora Ave N. #102	Shorline	WA	98133-4416	King
77	Recology CleanScapes Burien Retail Store	16200 1st. S.	Burien	WA	98166	King
78	Recology CleanScapes Retail Store	22833 Bothell-Everett Hwy, #111	Bothell	WA	98021	King
79	Seattle Home Builders Center	1110 W Nickerson St.	Seattle	WA	98119	King
80	Second Use Building Materials	3223 6th Ave S	Seattle	WA	98134	King
81	Shoreline Recycling and Transfer Station	2300 N 165th Street	Shoreline	WA	98133	King
82	South Seattle Household Hazardous Waste Collection Facility	8100 2nd Avenue South	Seattle	WA	98108	King
83	Stoneway Hardware and Supply	4318 Stone Way N.	Seattle	WA	98103	King
84	Stoneway Hardware Ballard	4910 15th Ave NW	Seattle	WA	98107	King
85	Total Reclaim	7021 S 220th St	Kent	WA	98032	King
86	Town Center Hardware	6613 132 AVE N.E.	Kirkland	WA	98033	King
87	Town Center Hardware	17171 Bothell Way NE	Lake Forest Park	WA	98155	King
88	Vashon Recycling and Transfer Station	18900 Westside Hwy SW	Vashon	WA	98070	King
89	Wallingford Tweedy & Popp Hardware	1815 N 45th St. Ste. 112	Seattle	WA	98103	King
90	Crown Hill Tweedy and Popp Hardware	9000 Holman Rd. NW	Seattle	WA	98117	King
91	Bainbridge Island Ace Hardware	635 High School Road NE	Bainbridge Island	WA	98110	Kitsap

92	Household Hazardous Waste Collection Facility	5551 SW Imperial Way	Bremerton	WA	98312	Kitsap
93	Scott McLendon's Hardware	1692 Mile Hill Dr.	Port Orchard	WA	98366	Kitsap
94	Swain's General Store	602 E 1st St	Port Angeles	WA	98362	Kitsap
95	Thurman Supply	1807 East Front Street	Port Angeles	WA	98362	Kitsap
96	HopeSource	700 E. Mountain View, Suite 501	Ellensburg	WA	98926	Kittitas
97	Woods Ace Hardware	310 North Pearl Street	Ellensburg	WA	98926	Kittitas
98	Allyns Building Center	517 N Mill St.	Goldendale	WA	98620	Klickitat
99	BZ Corners Transfer Station	5 Firtee Rd	Husum	WA	98623	Klickitat
100	Dallesport Transfer Station	126 Tidyman Rd	Dallesport	WA	98617	Klickitat
101	Goldendale Transfer Station	1205 W Broadway St.	Goldendale	WA	98920	Klickitat
102	Lewis County Solid Waste	1411 So Tower Ave.	Centralia	WA	98531	Lewis
103	Mason County Landfill	501 Eells Hill Rd	Shelton	WA	98584	Mason
104	Scott McLendon's Hardware	51 NE State Route 300	Belfair	WA	98528	Mason
105	Ellisforde Transfer Station	65 Swanson Mill Rd.	Oroville	WA	98844	Okanogan
106	Lee Frank Mercantile	324 S. Whitcomb ave.	Tonasket	WA	98855	Okanogan
107	Methow Recycles	12 Twisp Airport Road	Okanogan	WA	98856	Okanogan
108	Okanogan County Central Landfill	241 North B&O Rd.	Okanogan	WA	98840	Okanogan
109	Pacific County Household Hazardous Waste Facility	318 N Second St.	Long Beach	WA	98631	Pacific
110	Ace Hardware	4816 Pt. Fosdick Dr. NW	Gig Harbor	WA	98335	Pierce
111	Bartell Drugs	2700 Bridgeport Wy W Suite D	University Place	WA	98466-4600	Pierce
112	Batteries Plus Bulbs	31830 Pacific Hwy S	Federal Way	WA	98003	Pierce
113	Batteries Plus Bulbs	10210 123rd St. Ct. E	Puyallup	WA	98374	Pierce
114	Batteries Plus Bulbs	4027 Tacoma Mall Blvd.	Tacoma	WA	98409	Pierce
115	Crescent Lighting	3214 20th Street East	Fife	WA	98424	Pierce
116	Graham Ace Hardware	9807 224TH ST E SUITE 108	Graham	WA	98338	Pierce
117	JBLM DPW Environmental Operations	Bldg. 1210 Mann Ave. Box 339500 MS #17	Joint Base LewisMcChord	WA	98433	Pierce
118	Lakewood Ace Hardware	8123 Steilacoom Blvd. SW	Lakewood	WA	98498	Pierce

119	Lincoln Hardware	3726 South G Street	Tacoma	WA	98418	Pierce
120	McLendon Hardware	11307 Canyon Rd. E	Puyallup	WA	98373	Pierce
121	McLendon Hardware	1111 Fryer Ave.	Sumner	WA	98390	Pierce
122	McLendon Hardware	1015 N. Pearl Street	Tacoma	WA	98406	Pierce
123	Ace Hardware of Friday Harbor	340 Argyle Avenue	Friday Harbor	WA	98250	San Juan
124	CT Recycling	6739 Roche Harbor Road	Friday Harbor	WA	98250	San Juan
125	Lopez Solid Waste	2449 Fisherman Bay Road	Lopez Island	WA	98261	San Juan
126	The Exchange/Orcas Recycling Services	3398 Orcas Road	Eastsound	WA	98245	San Juan
127	Ace Hardware of Anacortes	1720 "Q" Avenue	Anacortes	WA	98221	Skagit
128	Chuckanut Lighting	938 Fountain St.	Burlington	WA	98233	Skagit
129	City Recycling Center	315 Sterling Street	Sedro-Woolley	WA	98284	Skagit
130	Ekrem Hardware Do-It Center	237 E. Fairhaven Ave.	Burlington	WA	98233	Skagit
131	Kaptein's Ace Hardware	1420 Riverside Dr.	Mount Vernon	WA	98273	Skagit
132	Skagit County Household Hazardous Waste Facility	14104 Ovenell Rd	Mount Vernon	WA	98273	Skagit
133	Columbia Hardware	24 NE 2nd St	Stevenson	WA	98648	Skamania
134	J & L Farm & Home	961 Wind River Road	Carson	WA	98610	Skamania
135	Stevenson Transfer Facility	1332 Ryan Allen Rd.	Stevenson	WA	98648	Skamania
136	Underwood Transfer Facility	1402 Little Buck Creek Rd.	Underwood	WA	98650	Skamania
137	Ace Hardware	303 91st Ave NE	Lake Stevens	WA	98258	Snohomish
138	Ace Hardware of Evergreen Way	4835 Evergreen Way	Everett	WA	98203	Snohomish
139	Ace Hardware of Silver Lake	11014 19th Avenue SE Ste. 100	Everett	WA	98208	Snohomish
140	Airport Road Recycling & Transfer Station	10700 Minuteman Dr.	Everett	WA	98204	Snohomish
141	Bartell Drugs	6602 64th Street NE	Marysville	WA	98270-4834	Snohomish
142	Batteries Plus Bulbs	909 SE Everett Mall Way	Everett	WA	98208	Snohomish
143	Batteries Plus Bulbs	4028 196th St. SW	Lynnwood	WA	98036	Snohomish
144	Batteries Plus Bulbs	4008 172nd St NE, Suite D	Arlington	WA	98223	Snohomish
145	Cedar Plaza Ace Hardware	22803 44th Ave. West Suite D-2	Mountlake Terrace	WA	98043	Snohomish

146	City of Mill Creek	15728 Main Street	Mill Creek	WA	98012	Snohomish
147	City of Monroe	City Hall at City of Monroe	Monroe	WA	98272	Snohomish
148	Darrington Hardware & Supply	1220 SR 530 NE	Darrington	WA	98241	Snohomish
149	Dubuque Road Neighborhood Recycling & Disposal Center	19619 Dubuque Road	Snohomish	WA	98290	Snohomish
150	Edmonds Hardware and Paint	201 5th Ave. S Suite 206	Edmonds	WA	98020	Snohomish
151	Granite Falls Neighborhood Recycling & Disposal Center	7526 Menzel Lake Road	Granite Falls	WA	98252	Snohomish
152	Homegrown Hydros	1241 State Ave, #102	Marysville	WA	98270-4834	Snohomish
153	Household Hazardous Waste Drop-off Station	3434 McDougall Ave.	Everett	WA	98201	Snohomish
154	Mukilteo Ace Hardware	12680 Mukilteo Speedway	Mukilteo	WA	98275	Snohomish
155	North County Recycling & Transfer Station	19600 63rd Ave. NE	Arlington	WA	98223	Snohomish
156	Southwest Recycling & Transfer Station	21311 61st Place West	Mountlake Terrace	WA	98043	Snohomish
157	Stanwood Ace Hardware	26477 72nd Ave NW	Stanwood	WA	98292	Snohomish
158	Sultan Neighborhood Recycling & Disposal Center	33014 Cascade View Drive	Sultan	WA	98294	Snohomish
159	Ace Hardware and Paint	906 S. Monroe	Spokane	WA	99204	Spokane
160	Batteries Plus Bulbs	11101 East Sprague	Spokane	WA	99206	Spokane
161	Batteries Plus Bulbs	7704 North Division Suite C	Spokane	WA	99208	Spokane
162	City of Cheney Recycling Center	100 Anderson Road	Cheney	WA	99004	Spokane
163	Deer Park Ace Hardware	141 West H Street	Deer Park	WA	99006	Spokane
164	South Hill Ace Hardware	4416 S. Regal St.	Spokane	WA	99223	Spokane
165	Spokane Valley Ace Hardware	15405 E. Sprague Ave	Spokane Valley	WA	99037	Spokane
166	Sunshine Disposal and Recycling	2405 N. University Rd.	Spokane Valley	WA	99206	Spokane
167	Wandermere Ace Hardware	12908 N. Hwy. 395	Spokane	WA	99218	Spokane

168	Waste Connections of Spokane	22123 N. Elk-Chattaroy Road	Colbert	WA	99005	Spokane
169	Waste Connections of Spokane	3941 North Sullivan Road	Spokane Valley	WA	99216	Spokane
170	Colville Hardware Do It Center	984 S. Main St.	Colville	WA	99114	Stevens
171	Sety's Ace Hardware	301 E. Main	Chewelah	WA	99109	Stevens
172	Batteries Plus Bulbs	2905 Capital Mall Dr. SW	Olympia	WA	98502	Thurston
173	Lincoln Creek Lumber/Ace Hardware	2421 93rd Ave SW	Tumwater	WA	98512	Thurston
174	Olympia Ace Hardware	400 Cooper Point Road	Olympia	WA	98502	Thurston
175	Thurston County Hazohouse	2420 Hogum Bay Rd NE	Lacey	WA	98516	Thurston
176	Batteries Plus Bulbs	632 South 9th Ave.	Walla Walla	WA	99362	Walla Walla
177	Sudbury Regional Landfill, City of Walla Walla	414 Landfill Rd.	Walla Walla	WA	99362	Walla Walla
178	Ace Hardware	1736 Front Street	Lynden	WA	98264	Whatcom
179	Ferndale Ace Hardware	5715 4th Ave.	Ferndale	WA	98248	Whatcom
180	Pacific Building Center - True Value Hardware	2677 Bell Road	Blaine	WA	98230	Whatcom
181	WFC Blaine Ace Hardware	1733 H Street Suite 700	Blaine	WA	98230	Whatcom
182	WFC Fairhaven True Value	3125 Old Fairhaven Parkway	Bellingham	WA	98225	Whatcom
183	WFC Fairway True Value	119 17th St.	Lynden	WA	98264	Whatcom
184	Whatcom County Disposal of Toxics Facility	3505 Airport Drive	Bellingham	WA	98226	Whatcom
185	Pullman Disposal Service	135 NW Harold Dr.	Pullman	WA	99163	Whitman
186	Whitman County Public Works Solid Waste Facility	252 Landfill Road	Pullman	WA	99163	Whitman
187	City of Sunnyside	818 East Edison	Sunnyside	WA	98944	Yakima

Registered Collection Sites (by county) who accept CFLs only:

TABLE 13: 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 th St.	Bellingham	WA	98225	Whatcom

APPENDIX D – COLLECTION SITE GUIDELINE

The following pages show the Collection Site Guideline provided to Collection Sites. The Program may change the Collection Site Guideline, supplies and marketing materials over the course of the Program. When the Collection Site Guideline is revised, Collection Sites will be notified and provided with an updated copy. The current version of the Collection Site Guideline can also be downloaded at this Web address:

<http://www.lightrecycle.org/wp-content/uploads/2016/11/LRW-Collection-Site-Guidelines.pdf>



Mercury-containing Light Recycling Program

Collection Site Guideline

October 2016

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Program Overview

Thank you for becoming a Collection Partner in the Washington State Recycling Program, **LightRecycle Washington**. These guidelines are provided to help ensure safe management and transportation of mercury-containing lights that are dropped off at your Collection Site.

Our Collection Partners enhance their communities and our State by helping reduce the number of mercury-containing lights that enter our landfills. Retail Collection Partners also benefit from increased customer traffic and from letting their community know that they care about the environment.

This document is intended to provide practical guidance to collectors in the LightRecycle Washington program and should be used to train personnel in the handling and management of Program materials. In addition, all collectors must comply with the requirements of the Mercury-Containing Lights Law (RCW 70.275) (the “Law”) and rule WAC 173-910-520. For more information, visit: www.ecy.wa.gov/programs/swfa/mercurylights

How the Program Works

Washington State residents bring unwanted mercury-containing fluorescent tubes/bulbs and High Intensity Discharge (HID) lights to authorized Collection Sites during business hours. As stated in the Law, collections sites can accept **up to 10 lights on any given day** from any individual, business or organization in Washington State. **There is no charge to drop the lights off.** Collection sites safely store the lights using containers and supplies provided by the program. The Program picks up full collection containers and provides replacement empty containers. . See Section 3 below for information on how to arrange the pick up of full containers and the re-supply of empty containers.

Safety

Fluorescent tubes, bulbs and HID lights accepted by the Program contain a small amount of mercury, which can pose a risk to human health and the environment if the light is broken. Take care when handling lights to prevent breakage. If a light is broken, open a window or door, leave the immediate area where the breakage occurred and consult the broken light handling procedure in Section 4 of this manual. Clean-up information is also available at the Washington State Department of Ecology Website:

www.ecy.wa.gov/mercury/mercury_bulb_cleanup.html.



LightRecycle Washington

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Section 1: Approved Materials for Collection

Washington State residents, businesses and other organizations can drop-off up to 10 mercury-containing lights per day at any authorized Collection Site.

Collection Partners accept the lights for recycling, store them in provided containers, and call for pick-up when containers are full. The LightRecycle Washington program provides all containers, supplies, transportation and recycling services.

ACCEPTED LIGHTS:

Accepted Lights: LightRecycle Washington will accept lights that contain mercury and provide functional illumination in homes, businesses, and outdoor stationary fixtures. The most common categories of these lights are described below.

ALL SHAPES AND SIZES OF THESE LIGHTS ARE ACCEPTED



Compact Fluorescent Lights (CFL's)

CFLs are known for their “corkscrew” design, but also come in a wide range of shapes, sizes and styles.



Fluorescent Tubes

Straight (or linear) fluorescent tubes come in sizes from one to eight feet. Other fluorescent tubes include U-shaped, circular and other curved shapes.



High Intensity Discharge (HID)

HID lamps come in a variety of shapes and sizes. HID lamp types include High Pressure Sodium, Mercury Vapor, Metal Halide, Ultraviolet (UV), Ultra High Performance (UHP) and Germicidal.

For further assistance in identifying accepted lights, including definitions and pictures, please refer to Appendix C.

NO CHARGE DROP-OFF

Under this program, no fees can be charged to customers dropping off accepted lights for recycling.

ACCEPTING BROKEN LIGHTS



Fluorescent tubes and bulbs that have been broken accidentally can be accepted at your collection site. Residents may bring their broken bulb and the materials used to clean it up (such as paper towel or cardboard) in a sealed plastic bag or other air-tight container. If a resident brings in a broken light, ensure it is in a sealed container and add it to the other materials that are being collected for recycling.

The program does not accept lights that have been intentionally crushed in quantities, either manually or mechanically (i.e. by a drum-top crusher, also known as a bulb crusher).

NON-PROGRAM LIGHTS AND PRODUCTS

LightRecycle Washington only accepts mercury-containing lights (lamps, bulbs and tubes) that contain mercury and provide functional illumination in homes, businesses, and outdoor stationary fixtures.

The Program does not accept incandescent, halogen, LED, or other lights that do not fit the above description. Collection sites can use LightRecycle Washington promotional literature to help explain this limitation to consumers. LightRecycle Washington provides this literature to Collection Sites at no charge.

LightRecycle Washington is not responsible for non-program materials accepted at Collection Sites.

Section 2: Collection Site Set-Up

LightRecycle Washington will provide each Collection Site with supplies and marketing materials needed to collect materials safely and effectively.

SUPPLIES

Collection Sites will be provided with:

- Boxes for all bulbs and u-shaped and curved tubes
- Boxes or fiber drums for fluorescent tubes (4 feet or less)
- Boxes or fiber drums for florescent tubes (over 4 feet and up to 8 feet)
- Broken Light Clean-up Kit



NOTE: Boxes will ship flat with a plastic liner and re-closable zip tie and require minimal assembly prior to use.

SIGNAGE AND MARKETING MATERIALS

Signage and promotional materials are intended to raise awareness about recycling lights. Examples of promotional pieces may include:

- Window Sign
- Brochure and/or rack card, detailing the recycling program
- Promotional Magnets
- Shelf Talkers
- Door Stickers
- Counter Stands (for 8.5" x 11" flyer)

These materials are provided at no charge to Collection Partners and can be re-ordered by:

- Telephone:
- Order online at www.LightRecycleWA.org.

Please display signage and promotional pieces prominently.
Contact us with questions, feedback, or to request additional materials.

CHOOSING A STORAGE LOCATION

You will need a storage location for collected lights and program supplies. Recommendations for the storage location include:

- Select a storage location that can easily be accessed by personnel who are carrying lights that have been dropped off, but is away from high-traffic areas.
- Storage area should be inaccessible to the public (i.e. authorized personnel only) except in settings designed for supervised self-service.
- It should be easy to move full containers of lights from the storage area to transport vehicle.
- The floor surface should be impervious, and the area should be dry, protected from the weather and free of debris and away from drains. Wet lights cannot be transported for recycling.
- The space used for collection containers must hold a minimum of:
 - two boxes for bulbs (approx. 14" x 10" x 24"),
 - two boxes for 4-foot fluorescent light tubes (8" x 8" x 48") and
 - one box for 8-foot fluorescent light tubes (8" x 8" x 96").
- Secure the area during non-operating hours.

- The storage location must be equipped with a Broken Light Clean-up Kit provided by the Program.



PUBLIC ACCESS AND SECURITY

The Collection Site is only required to accept lights during regular business hours. However, if lights accepted by the Program are abandoned at the Site when closed, please add them to your collected materials for recycling.

Section 3: Collecting and Storing Lights

LIGHTS SHOULD BE HANDLED, STORED AND TRANSPORTED CAREFULLY TO AVOID BREAKAGE. LIGHTS COLLECTED THROUGH THIS PROGRAM WILL BE MANAGED AS UNIVERSAL WASTE.

FOR MORE INFORMATION, REVIEW THE WASHINGTON STATE UNIVERSAL WASTE RULE FOR LAMPS, WAC 173-303-573(5).

At retail store collection locations and some municipal facilities, lights will be received by site personnel and placed in containers at the designated storage area. Customers and visitors should not have access to the collection containers.

Some municipal facilities may allow individuals to place the lights into the containers themselves during operating hours, as long as site personnel is available to answer questions regarding acceptable materials and quantities.



CFLs, HIDs and u-shaped or circular tubes go in the smaller boxes. Linear tubes are placed in boxes for the appropriate length (tubes that are 4 feet or under should go in the 4-foot boxes. Tubes longer than 4 feet go in the 8-foot boxes). All containers will come with a plastic liner and re-closable zip tie.

The following methods will ensure safe light handling and risk minimization:

- Handle collected lights gently to prevent breakage. The lights should be handled by their bases, not the glass portion.
- Set lamps into the containers carefully. Do not drop, throw or toss lights.
- All containers will include a plastic liner which must be in place before the container is used to hold lights.

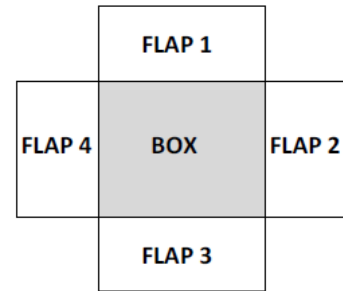
- Store the lights in a secure area where they will not be run into or toppled.
- Keep CFL, HID and shaped tubes separate from linear tubes.
- Do not tape or use rubber bands to hold bubs or tubes together. Tape must be removed before the lights are placed in the storage containers.
- Use provided containers to collect lights. The containers must remain structurally sound and lack evidence of leakage, spillage or damage.
- Broken lamps must be cleaned up immediately.
- Do not over-fill collection containers as they will be difficult and dangerous to close and may be rejected for shipping.
- Do not force fluorescent tubes in the collection container. If a tube does not slide into place within the container, the container is full.
- Do not stack material on top of collection containers.

PACKAGING

Cardboard boxes used to collect, store and ship CFL and HID lights are assembled and sealed like other boxes, with one important exception: **All open flaps must be sealed closed with packing tape.** This requirement, the plastic liner and re-closable zip tie, minimize leakage, even if the lights shift or break during transport.

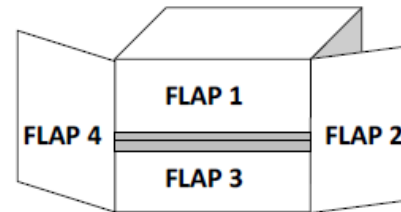
Collection Box Assembly: Bulbs

1. Start by unfolding the flattened box into a square shape.



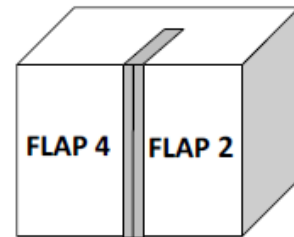
2. Fold Flap 1 and Flap 3 over the box opening until they meet in the middle.

3. Affix two (2) strips of packing tape down the middle of the flaps.



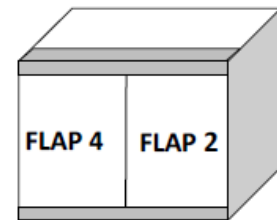
4. Fold Flap 2 and Flap 4 until they meet in the middle.

5. Affix two (2) strips of packing tape down the middle of the flaps. Make sure that the strips of tape reach down the side of the box at least six (6) inches (15 cm).



6. Affix two (2) strips of packing tape along each side of the box where the flaps were closed.

7. Ensure that all open edges of the bottom of the box are securely taped up



8. Open the plastic liner bag provided inside the box and fold the liner over the top end of the box

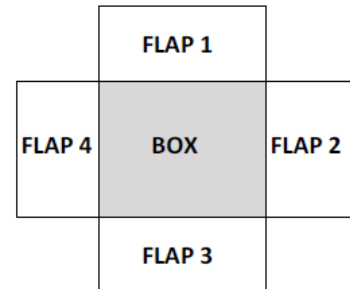
Upon completion of steps 1-8, the box is now ready for use.

Collection Box Assembly: 4 foot and 8 foot Tube boxes

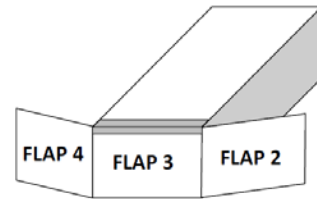
Cardboard boxes used to collect, store and ship linear fluorescent lights are assembled and sealed like other boxes, with one important exception: **All open flaps must be sealed closed with packing tape.** This requirement, the plastic liner and re-closable zip tie, minimize leakage, even if the lights shift or break during transport.

1. Start by unfolding the flattened box into a rectangular shape.

Note: All four flaps are full flaps.



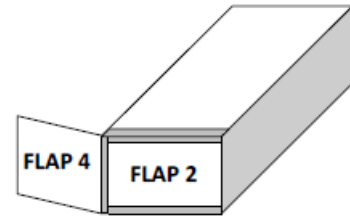
2. Fold Flap 1 and Flap 3 over the box opening.



3. Affix two (2) strips of packing tape along the edge of the box where the flap is closed.

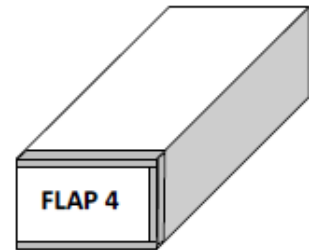
4. Fold Flap 2 over.

5. Affix two (2) strips of packing tape along each of three (3) edges of the box where the flap was closed.



6. Fold Flap 4 over.

7. Affix two (2) strips of packing tape along each of the three (3) edges of the box where the flap was closed.



8. Make sure all the open edges of the bottom of the box are securely taped up.

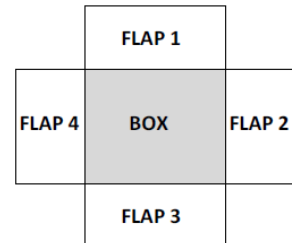
9. Open the plastic liner bag provided inside the box and fold the liner over the top end of the box.

Upon completion of steps 1-9, the box is now ready for use.

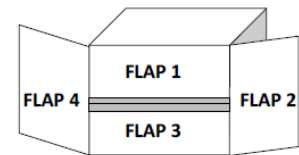
Taping Method for Full Bulb Boxes

Cardboard boxes used to collect, store and ship CFL and HID lights are assembled and sealed like other boxes, with one important exception: **All open flaps must be sealed closed with packing tape.** This requirement, the plastic liner, and re-closable zip tie, minimize leakage, even if the lights shift or break during transport.

1. Once the box is full, open the flaps as shown (top view).

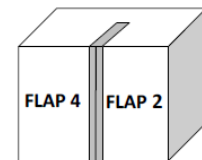


2. Fold Flap 1 and Flap 3 over the box opening until they meet in the middle.



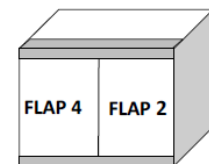
3. Affix two (2) strips of packing tape down the middle of the flaps.

4. Fold Flap 2 and Flap 4 until they meet in the middle.



5. Affix two (2) strips of packing tape down the middle of the flaps. Make sure that the strips of tape reach down the side of the box at least six (6) inches (15 cm).

6. Affix two (2) strips of packing tape along each of the box where the flaps were closed.

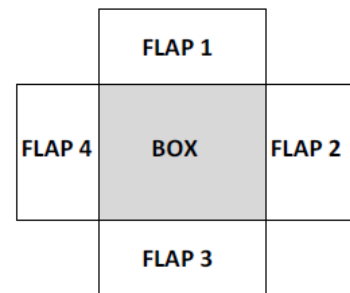


Taping Method for Full Fluorescent Tube Boxes

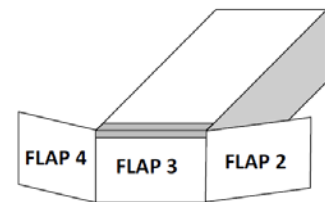
Cardboard boxes used to collect, store, and ship linear fluorescent lights are assembled and sealed like other boxes, with one important exception: **All open flaps must be sealed closed with packing tape.** This requirement, the plastic liner, and re-closable zip tie minimize leakage, even if the lights shift or break during transport.

1. Once the box is full, open the flaps as shown (top view).

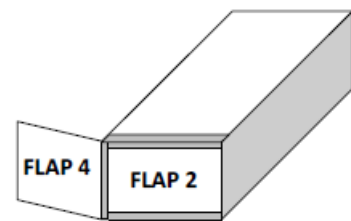
Note: All flaps are full flaps.



2. Fold Flap 1 and Flap 3 over the box opening.

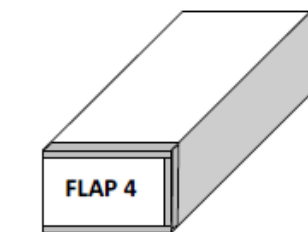


3. Affix two (2) strips of packing tape along the edge of the box where the flap is closed.



4. Fold Flap 2 (full flap) over.

5. Affix two (2) strips of packing tape along each of the three (3) edges of the box where the flap was closed.



6. Fold Flap 4 (full flap) over.

7. Affix two (2) strips of packing tape along each of the three (3) edges of the box where the flap was closed.

PREPARING COLLECTED MATERIALS FOR TRANSPORT

The collected lights should be stored and packaged in a way that avoids breakage.

- Do not tape bulbs or tubes together or use rubber bands.
- Do not overfill containers.
- Close the liner bag securely with the re-closable zip tie and seal containers so that they will not leak, even if the contents shift or break during transport.
- Check that the box is structurally sound and has no evidence of damage.
- Seal boxes with packing tape in preparation for ship-out. Please see the Taping Methods above for both types of boxes.

PREPARING AND ARRANGING FOR TRANSPORT

Timing: You should order a pick-up at least two weeks before all of your containers are full. Do not wait until you are down to your last empty box.

Before scheduling a pick-up, make sure that containers being shipped are sealed securely for transport. Transport vehicles that have been scheduled may not wait once they have arrived on site.

- a. The carrier will arrive at your location with a Bill of Lading (BOL) to document the pick-up. It will already be completed with the number of pieces they are picking up.
- b. Review the BOL for the pick-up. Confirm that it is complete and make any changes that are necessary. Double check these items to be sure they are correct:
 - i. The number of boxes and category of materials they contain (i.e. fluorescent lights, CFLs or HIDs)
 - ii. The Collection Site address



It is your responsibility to make sure that shipping information is correct.

HOW TO ORDER A PICK UP

Large Collection Sites	Small Collection Sites
<p>Shipping <u>fiber drums, pallet boxes</u> or <u>at least five boxes</u> at a time.</p> <p><u>To schedule a Pick-up use one of these two methods:</u></p> <ol style="list-style-type: none">1. Log in at LightRecycleWA.org and complete the Schedule a Pick-up/Supply Order form.2. Call EcoLights at (888) 214-2327 to arrange transportation or order supplies	<p>Shipping less than five boxes at a time, using recycling kits that ship via FedEx.</p> <p><u>Single boxes can be placed with other boxes that are being picked up by FedEx.</u></p> <p><u>If no regular FedEx pick-up schedule is in place, schedule a pick-up through FedEx online at www.fedex.com or by calling (800) GO-FEDEX.</u></p>

Section 4: Broken Lights at Your Collection Site

RISKS

Mercury containing lights contain a small amount of mercury, which is toxic and can pose a threat to human health and the environment if the light is broken. A careful and prompt cleanup of broken lights will minimize exposure to staff, customers and the environment.

Clean-up Procedure Web Pages:

WA Department of Ecology Fluorescent Light Clean Up:

www.ecy.wa.gov/mercury/mercury_bulb_cleanup.html

BROKEN LIGHT CLEAN-UP KIT

The program will supply each collection site with a kit for cleaning up broken fluorescent or HID lamps. If you need replacement items, please complete the Schedule a Pick-up/Supply Order form at LightRecycleWA.org or call EcoLights at (877) 214-2327.

CLEAN-UP PROCEDURE

Be careful not to break fluorescent bulbs. However, if a bulb breaks, do not panic; just follow these simple instructions:



**Avoid breathing vapors or touching broken materials.
Do not vacuum or sweep.**

1. Open windows to vent vapors for at least 15 minutes. Leave the area during this time.
2. Use stiff paper or cardboard to pick up large pieces.
3. Use duct tape to pick up small pieces and powder.
4. Wipe the area clean with a damp paper towel or wet wipe.
5. Place all materials in an air-tight container, such as a plastic bag that is completely sealed with tape. Be sure to include the broken light and any items that were used to clean it up.
6. Place the sealed bag in a light collection box. It will be processed for recycling.
7. Wash your hands.

Section 5: Record Keeping and Reporting

RECORD KEEPING

Maintain all records and documentation including applicable manifest, bill of lading, training records, and other data as required for a minimum of 2 years.

REPORTING INCIDENTS OR FINES

Injuries to collection site staff are extremely rare. However, should they occur, the collection site will provide notice of the following to the program:

- Incidents of these types must be reported to LightRecycle Washington within 24-hours of the occurrence:
 - Injuries requiring the assistance from a Doctor or first responders
 - Incidents that are reported to OSHA (Occupational Safety and Health Administration)
- Any regulatory orders or fines within 48 hours of receiving such orders or fines



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Section 6: Training

Collection Sites are responsible for training employees in safe and effective program procedures. The program is designed to be self-directed, using this manual as a guideline.

This guideline is intended to provide practical guidance and best management practices for the handling and storing of products collected under the Washington Mercury-Containing Lights Product Stewardship Program. This guideline should be used by Collection Site managers to instruct staff in required program practices.

The practices described in this guideline are not intended to replace or relieve the site operator or staff of any standards, acts or regulations required under local, state or federal law.

PCA Product Stewardship, Inc. accepts no responsibility and assumes no liability resulting from the incorrect use of information contained in this guideline or from the use of this information in any circumstances other than those described.

All collection site workers must understand these Guidelines and have a clear understanding of:

- The handling and management of lights including but not limited to:
 - Potential hazards and risks associated with handling lights
 - Proper and safe handling and packaging of lights
 - Ways to reduce risk
 - Safety and emergency procedures
- Broken light clean-up procedures
- The operations training program and policies/procedures set by the program
- The identification of program and non-program products
- The completion of proper shipping documentation and record keeping

Newly hired employees must be instructed on the information in these Guidelines before they are permitted to handle lights.

Collection Site Operators should schedule regular training sessions with staff members who have emergency response responsibilities. This will help keep staff informed and up to date on Program procedures.

Appendix A – Collector Requirements

All authorized, LightRecycle Washington Collection Sites agree follow these Collector Requirements:

- (1) Mercury-containing lights must be collected free of charge. Collection Sites cannot charge for lights that are dropped off and recycled through the LightRecycle Washington program.
- (2) Collectors may not intentionally crush or process collected lights. All collected lights must be sent to the LightRecycle Washington authorized processor for recycling.
- (3) Collectors must comply with the standards for collection small quantities of universal waste (WAC 173-303-573), as well as all other applicable laws, rules, and local ordinances. Collection Site guidelines provided by the Program will outline these responsibilities.
- (4) As an approved collection site, you must:
 - (a) Staff the site during operating hours;
 - (b) Notify LightRecycle Washington of changes in hours and days of operation;
 - (c) Handle collected lights in a way that prevents releases of mercury to the environment;
 - (d) Have a mercury release response plan that describes the materials, equipment, and procedures to clean up broken lights. (LightRecycle Washington will provide you with one if you do not have one of your own.)
 - (e) Have a worker safety plan (provided by LightRecycle Washington) that describes safe handling procedures to protect worker health and safety;
 - (f) Package and ship collected lights using supplies provided by LightRecycle Washington. These supplies are designed to minimize the release of mercury into the environment by volatilization (or any other means) and reduce breakage.
- (5) A collector must allow the Washington State Department of Ecology or LightRecycle Washington access for inspections to determine compliance with the Collection Site requirements.
- (6) No entity may claim to be collecting mercury-containing lights for LightRecycle Washington unless the entity is registered with LightRecycle Washington as a collector and submits all collected mercury-containing lights to transporters and processors authorized by LightRecycle Washington.
- (7) All Collection Site locations must maintain general liability insurance of at least \$1,000,000 per occurrence. If requested by the Washington State Department of Ecology or LightRecycle Washington, the Collection Site must provide documentation indicating that the liability policy is in place with contact information for the insurance carrier or agent.
- (8) Any collector found to be out of compliance with the collector requirements will have its participation in the program cancelled.

Appendix B – Forms

- PICK-UP REQUEST
- CONTAINER REQUEST



Please keep these forms blank and photocopy as needed.

LightRecycle Washington
Pick-up Request



Please fax this form to: (206) 343-7445

TODAY'S DATE: _____

**COLLECTION SITE
NAME:** _____

ADDRESS: _____

PHONE: _____ **FAX:** _____

SHIPPING HOURS: _____

CONTACT PERSON: _____

TO BE PICKED UP:	Quantity
BULB BOXES (CFLs and HIDs)	_____
4' FLUORESCENT TUBE BOXES (8" x 8" x 48")	_____
8' FLUORESCENT TUBE BOXES (8" x 8" x 96")	_____
Fiber Drum (length: _____)	_____

SPECIAL SHIPPING INSTRUCTIONS:

LightRecycle Washington
Container Request



Please fax this form to: (206) 343-7445

TODAY'S DATE: _____

**COLLECTION SITE
NAME:** _____

ADDRESS: _____

PHONE: _____ **FAX:** _____

SHIPPING HOURS: _____




CONTACT PERSON: _____

CONTAINERS REQUESTED:	Quantity
BULB BOXES (CFLs and HIDs)	_____
4' FLUORESCENT TUBE BOXES (8" x 8" x 48")	_____
8' FLUORESCENT TUBE BOXES (8" x 8" x 96")	_____
4' Fiber Drum	_____

SPECIAL SHIPPING INSTRUCTIONS:

Appendix C – Accepted and Not-Accepted Products List

The program includes all lamp mercury-containing lights including:

Accepted Products	
Fluorescent Tubes - Straight/Linear	
Includes all diameters and light outputs in a straight/linear configuration. Can range in size from under 2 feet in length to 8 feet in length.	
	
Fluorescent Tubes - Curved/Circular	
Includes all diameters and light outputs in a curved/circular configuration (curved, square, U, etc.).	
	
UV and Germicidal Lamps	
UV or germicidal lamps of all shapes and sizes. All base types including pin-type, screw-in, etc.	
	

Accepted Products

Compact Fluorescent Lamps (CFLs)

Fluorescent bulbs that are typically similar in size and intended to replace an incandescent (traditional) light bulb.



High Intensity Discharge (HID) and Other

Includes these HID types: high pressure sodium, mercury vapour and metal halide. These lamps vary in size but are much larger than a typical bulb. In some cases, they can be as big, or bigger, than a football.



Pictures are shown as illustrative examples only and should not be considered an endorsement of any brand or supplier

NOT Accepted • Non-Program Products

Halogen and Incandescent- Bulbs

Filament lamps of all shapes, sizes and wattages. All base types including pin-type, screw-in, etc.



Light Emitting Diodes (LED)

Solid-state lamps used for specialty purposes and conventional lighting applications. All base types including pin-type, screw-in, etc.



Fixtures / Decorative Light Strings



APPENDIX E – COLLECTION SITE REGISTRATION INFORMATION

The registration information for all registered Collection Sites listed in Appendix C is held by Ecology and complies with WAC 173.910.420(5)(b) and (c). The following is the agreement form that collection sites must complete to register with the Program.



Collection Site Registration

Thank you for your interest in becoming a registered LightRecycle Washington Collection Site.

Collection Sites must register with LightRecycle Washington, and agree to use safe practices for collecting, storing and shipping mercury-containing lights. LightRecycle Washington will provide written Collection Site guidelines, signage, marketing materials, and all the supplies you will need to safely and effectively operate your Collection Site.

Please complete the form below. If you have questions, please call Peter Thermos, Program Manager, at (206) 850-7383.

Name of Business or Organization Operating Collection Site (Example: <i>Main Street Hardware</i>):		
Complete Legal Name of Business or Organization (Example: <i>Main Street Holdings LLC</i>):		
Collection Site Street Address:		
City	WA	ZIP Code
Collection Site Telephone, including area code:	Collection Site Fax:	
Business or Organization Owner's Name:	Collection Site Operator's Name:	
Collection Site Operator's Business Address (if different from address above):		
City	WA	ZIP Code
Collection Site Operator's Telephone:	Collection Site Operator's E-mail:	
Days and Hours of Operation (Please provide the opening and closing times for all days of the week.):		

Check box if additional locations and contact information are attached.

Initials	Date
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Collection Site Registration Requirements

- (1) Mercury-containing lights must be collected free of charge. Collection Sites cannot charge for lights that are dropped off and recycled through the LightRecycle Washington program.
 - (2) Collectors may not intentionally crush or process collected lights. All collected lights must be sent to the LightRecycle Washington authorized processor for recycling.
 - (3) Collectors must comply with the standards for collection small quantities of universal waste (WAC 173-303-573), as well as all other applicable laws, rules, and local ordinances. Collection Site guidelines provided by the Program will outline these responsibilities.
 - (4) As an approved collection site, you must:
 - (a) Staff the site during operating hours;
 - (b) Notify LightRecycle Washington of changes in hours and days of operation;
 - (c) Handle collected lights in a way that prevents releases of mercury to the environment;
 - (d) Have a mercury release response plan that describes the materials, equipment, and procedures to clean up broken lights. (LightRecycle Washington will provide you with one if you do not have one of your own.)
 - (e) Have a worker safety plan (provided by LightRecycle Washington) that describes safe handling procedures to protect worker health and safety;
 - (f) Package and ship collected lights using supplies provided by LightRecycle Washington. These supplies are designed to minimize the release of mercury into the environment by volatilization (or any other means) and reduce breakage.
 - (5) A collector must allow the Washington State Department of Ecology or LightRecycle Washington access for inspections to determine compliance with the Collection Site requirements.
 - (6) No entity may claim to be collecting mercury-containing lights for LightRecycle Washington unless the entity is registered with LightRecycle Washington as a collector and submits all collected mercury-containing lights to transporters and processors authorized by LightRecycle Washington.
 - (7) All Collection Site locations must maintain general liability insurance of at least \$1,000,000 per occurrence. If requested by the Washington State Department of Ecology or LightRecycle Washington, the Collection Site must provide documentation indicating that the liability policy is in place with contact information for the insurance carrier or agent.
 - (8) Any collector found to be out of compliance with the collector requirements will have its participation in the program cancelled.
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I am authorized to register this location as a LightRecycle Washington Collection Site and I have read and agree to the Collection Site Registration Requirements for all locations.

Signature	Date
Print Name	Title