



April 2, 2013

Mr. Jon Mortrud
Budget Lamp Reclaimers, Inc.
3224 Kingsley Way
Madison, WI 53713

File Ref: WIR000050302
FID313001810

Subject: Hazardous Waste Compliance Evaluation Inspection - Return to Compliance
Budget Lamp Reclaimers, Inc. - 3224 Kingsley Way, Madison

Dear Mr. Mortrud:

On July 18, 2012, the Department inspected Budget Lamp Reclaimers, Inc. (Budget Lamp) located at 3224 Kingsley Way, Madison, Wisconsin for compliance with Wisconsin's hazardous waste regulations. The inspection indicated that Budget Lamp was not in compliance with some of the hazardous waste very small quantity generator (VSQG) and universal waste large quantity handler (LQH) requirements of Chapters NR 660 to 679, Wisconsin Administrative Code. In a letter dated September 4, 2012, the Department listed the alleged areas of noncompliance and areas of concern.

The Department received a submittal from Budget Lamp dated September 18, 2012. This submittal documented that Budget Lamp corrected or addressed areas of noncompliance #2, #4, #5 and areas of concern #8, #9, #11, #12 listed in the Department's letter dated September 4, 2012.

Additional documents and inspections addressing Budget Lamp include:

1. Department's October 15, 2012 follow-up letter to Budget Lamp
2. November 26, 2012 submittal from Budget Lamp
3. November 27, 2012 e-mail submittal from Budget Lamp
4. December 26, 2012 submittal from Budget Lamp
5. January 29, 2013 meeting with Budget Lamp (during which twelve black and white photos were submitted by Budget Lamp)
6. Department's February 12, 2013 follow-up site inspection of Budget Lamp
7. February 18, 2013 submittal from Budget Lamp
8. Department's February 19, 2013 e-mail to Budget Lamp
9. February 26, 2013 e-mail submittal from Budget Lamp
10. February 27, 2013 e-mail submittal from Budget Lamp
11. Department's March 29, 2013 follow-up site inspection of Budget Lamp

Based on the documents and inspections listed above, the Department is now satisfied that the remaining areas of noncompliance #1, #3 and areas of concern #6, #7, #10 listed in the Department's letter dated September 4, 2012 have been corrected or addressed as follows:

#1: Budget Lamp stated it does not pick up universal waste lamps from its customers for transport if they are not placed in structurally sound, closed containers. Budget Lamp stated it furnishes containers to its customers upon request. At Budget Lamp, universal waste lamps are now stored in closed containers when they are not being counted or added to/removed from containers or until they are moved to the lamp crushing room for immediate processing.

#3: Budget Lamp stated it does not accept elemental mercury or any other hazardous waste that it inadvertently acquires. Further, Budget Lamp stated it directs households and businesses to either appropriate clean sweeps or to facilities that are licensed to accept hazardous wastes, as needed.

#6: Budget Lamp has constructed an enclosure that surrounds each dumpster as each one is filled with broken or crushed lamp debris (i.e., phosphor powder, glass and metal end caps) during lamp crushing operations to better contain dust emissions. Further, Budget Lamp stated that the dumpsters containing lamp debris are equipped with adequate covers and constructed so that the crushed lamp debris and dust do not escape or leak from the dumpsters during a precipitation event or at any other time. Further, Budget Lamp stated that it now performs outside cleanup of lamp debris and dust (which includes use of a vacuum with a HEPA filter) each day at the end of the work shift.

#7: Budget Lamp stated it now performs inside cleanup of lamp debris and dust (which includes use of a vacuum with a HEPA filter) each day at the end of the work shift.

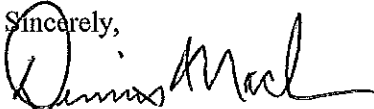
#10: Again, Budget Lamp stated it does not accept elemental mercury or any other hazardous waste that it inadvertently acquires, but does understand the hazardous waste labeling requirements.

The Department appreciates the efforts of you and your employees at Budget Lamp in achieving and maintaining compliance with the State of Wisconsin hazardous waste generator requirements. As a generator of hazardous waste, Budget Lamp is responsible for knowing and correctly implementing the hazardous waste management regulations applicable to its facility and operations. The Department and/or the U.S. Environmental Protection Agency may perform additional inspections at this facility in the future to insure compliance with Chapters NR 660-679, Wis. Adm. Code. While the State of Wisconsin is authorized to implement the federal hazardous waste management program, the U.S. Environmental Protection Agency retains concurrent program authority and conducts inspections in order to provide regulatory oversight in the State.

Finally, please be aware that Budget Lamp is subject to the on-going regulatory requirements of other state and municipal programs such as the Wisconsin Department of Natural Resources' and City of Madison's respective Storm Water Programs.

If you have any questions regarding this letter, please contact Cynde English of my staff at 608-275-3240.

Sincerely,



Dennis Mack, P.E., Leader
Waste & Materials Management Program
South Central Region
(608) 275-3466

Cc: Linda Hanefeld – SCR Remediation and Redevelopment
Eric Rortvedt – SCR Storm Water
Cynde English – SCR Waste & Materials Management
Greg Fries – City of Madison Storm Water Program