



Re: EPA Procedures

In accordance with the current regulations concerning recycling spent batteries, All Battery Sales and Service, falls into the exempt status category as a Large Quantity Universal Waste Handler under 40 CFR 273. The Department of Ecology, Department of the Army, and The Boeing Company Environmental Services and Snohomish County Health Department have inspected us.

We confirm that all spent batteries picked up by All Battery Sales and Service, are sent to smelters or sites approved by the U.S. Environmental Protection Agency. After the batteries are broken down, the metals, containers, and reactant are then processed for recycle.

All Battery Sales and Service, fully indemnifies the owner once the product leaves your facility. A Business Uncover Insurance Policy and a Five million dollar umbrella, plus a separate million dollar environmental rider cover All Battery's trucks and facilities.

When you give your spent batteries to us, each unit follows the path outlined below from the point of pickup to the smelter or approved recycle facility.

1. The batteries are picked up as requested by you, by our truck.
2. The batteries are taken to our warehouse in Everett.
3. The batteries are stacked and wrapped on pallets according to DOT regulations (lead acid batteries).
4. Ownership of these pallets of batteries is then transferred to Interstate Battery System of America or East Penn Manufacturing at our loading dock and they are transported by trucks contracted by them, with the correct environmental insurance in place; to be processed by EPA approved smelters. These recycled batteries provide them with raw materials to manufacture new batteries. Interstate Battery System of America and East Penn Manufacturing fully indemnifies All Battery Sales and Service, and your company from any environmental liability associated with the batteries sold to them.
5. All other rechargeable chemistries such as Ni-cad, Ni-MH, Li-Ion and Carbon Zinc are sorted at our warehouse where we accumulate sufficient quantities for truckloads and then ship them according to D.O.T. regulations to Battery Solutions which is an EPA approved recycler.

- 6 Non rechargeable batteries such as alkaline are stored at our warehouse and shipped to Battery Solutions where they are recycled by grinding them and adding the mix to steel being made for rebar. The choice of disposal method is selected by our customer and affects the amount charged per pound for the batteries.
- 7 All Battery Sales and Service, fully indemnifies your company from any environmental liability concerning the above spent battery shipments.

Our Washington State DOE recycling number is #240. Our EPA site ID # is WAH000034354

The names and addresses of the smelters where the lead acid batteries are sent, along with their EPA numbers are listed below; also Kinsbursky Brothers address and e-mail address:

*East Penn
Deka Road.
Lyon Station PA 19536
PAD002330165*

*RSR/Quimetco
720 S. 7th Avenue
City of Industry, CA 98745
CAD066233966*

*KinsburskyBrothers
1314 N. Lemon Street
Anaheim, CA 92801
#CAD088504881*

Dry chemistry batteries are recycled at the addresses below:

*Battery Solutions
2618 North Ogden, Suite 105
Mesa, AZ 85215
AZR 000504902*

*Nucor Steel
2424 SW Andover St
Seattle, WA 98106*

*Toxco Canada
British Columbia 22
Alt, BC, Canada*

Sincerely,

Chuck Allen
General Manager