



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

June 7, 2016

Scott M. DeMuth, CEM
Vice President, Business Operations
G2 revolution, LLC
8585 Pyott Rd, Suite 100
Lake in the Hills, IL 60156

Re: g2 revolution
Compliance Review
Correspondence
RCRA C – Hazardous Waste
Hancock County
OHR000191932

Subject: Knightshade Recycling Process is Legitimate

Dear Mr. DeMuth:

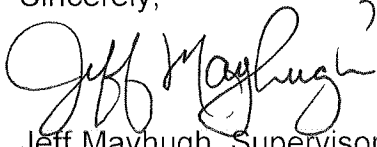
Thanks for allowing Colleen Weaver, Allie Reynolds, and I to view the Knightshade recycling process at your Findlay, Ohio facility on May 19, 2016. We understand that much of your process is proprietary and to that end you have submitted a trade secret request with your subsequent submittal of information on (date). We have evaluated that information and in conjunction with our observations during the site visit have determined that the Knightshade reclamation process is a legitimate recycling process comporting with Ohio Administrative Code (OAC) rule 3745-51-02(F) which provides in part that: *Persons who raise a claim that a certain material is not a waste, or is conditionally exempt from regulation, must demonstrate that there is a known market or disposition for the material and that they meet the terms of the exclusion or exemption. In doing so, they must provide appropriate documentation (such as contracts showing that a second person uses the material as an ingredient in a production process) to demonstrate that the material is not a waste, or is exempt from regulation. In addition, owners or operators of facilities claiming that they actually are recycling materials must show that they have the necessary equipment to do so.*

Furthermore, pursuant to OAC 3745-51-02(C)(3), we have concluded that the smoking cessation aids and electronic cigarettes that you receive from retail outlets for reclamation are not wastes and are therefore not hazardous wastes because they are commercial chemical products that are being legitimately reclaimed.

During the site visit we viewed the entire Knightshade process and observed the equipment that you are using to extract the nicotine from smoking cessation aids and electronic cigarettes. During the visit you committed to providing documentation that you have a buyer for the nicotine who will use it as an ingredient in a manufacturing process. The information you provided in your May 31, 2016 letter to adequately demonstrates that you have an agreement in principal to sell specific quantities of nicotine recovered from smoking cessation aids and electronic cigarettes. This nicotine will be used to manufacture electronic cigarettes.

If you have any questions, please contact me by phone at 614-644-2950 or email at Jeffre.Mayhugh@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink that reads "Jeff Mayhugh". The signature is written in a cursive, flowing style.

Jeff Mayhugh, Supervisor
Compliance and Inspection Support
Hazardous Waste – DERR

JM/sh

cc: Colleen Weaver, HW-DERR, NWDO
Allie Reynolds, HW-DERR, NWDO
Melissa Boyers, HW-DERR, NWDO