

IN THE MATTER OF:)
)
Mercury Vapor Processing)
Technologies Inc., aka River)
Shannon Recycling)
13605 S. Halsted St.)
Riverdale, Illinois 60827)
)
Respondent)

DOCKET NO.
RCRA-05-2010-0015

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OCT 29 2010
REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

**United State Environmental Protection Agency
Region V**

RESPONDENT'S INITIAL PREHEARING EXCHANGE

Pursuant to the Presiding Officer's Prehearing Order of June 15, 2010, the Respondent, by answering Pro Se, submits the following Initial Prehearing Exchange. The categories of information below follow the sequence set forth in the Presiding Officer's Order.

A. No Witnesses will be called

For the Presiding Officer's convenience, the following is a list of documents or other items that Respondent presently intends to offer as exhibits.

B. ATTACHMENTS AND EXHIBITS:

ATTACHMENTS:

Certificate of Service
Motion for Amendment of Answer
Respondent's Statement Regarding Compliance and Penalty

EXHIBITS:

- 1a. 2004 FY Performance Conference
- 1b. 2005 FY Performance Conference
- 1c. 2006 FY Performance Conference

2. Where you live: A guidance document listed on the USEPA's website

3. 35 IAC 703.123: Persons excluded from RCRA permitting

- 4a. USEPA memo to Regional Administrator
- 4b. USEPA memo to Region V from Eric Schaeffer, Director,
Office of Regulatory Enforcement

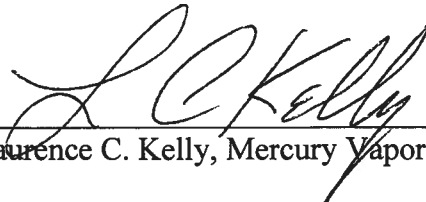
5. Generator ID: USEPA Large Quantity Generator ILD number
6. 35 IAC 733 – In its Entirety
7. Flow Chart – Universal Waste Protocols
8. Patent Info- Mobile Volume Reduction Equipment
9. IEPA letter – SLR’s Authorizations
- 10a. Letters from glass re-users
- 10b. Letters from glass re-users
11. Land and Lakes: Non-hazardous Waste Profile for disposal
12. Calgon return / reactivation statement
13. Mercury containing light bulb FAQ – re: No mercury exposure from whole lamp.
14. TCLP Results: EMT Laboratory
15. Response: Referenced location of quote in response
- 16a- Media / Press releases: USEPA
- 16b- Media / Press releases: USEPA
17. Riverdale Settlement agreement: Federal Court Agreed Dismissal Order
18. USEPA info request 10/3/08
19. USEPA REFERRAL TO CRITES: Guidance Document on USEPA website
20. Results of FOIA: Statement made by Jane E, Ratcliffe,
Chief, Internal Services Section
21. Copy of Federal Tax Returns: 2004 to 2008. See enclosed statement.

C. Respondent agrees with Complainant to the location of the hearing. Further, respondent requests 1 hour.

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PROTECTION AGENCY

10-27-10
Date



Laurence C. Kelly, Mercury Vapor Processing Tech., Inc.

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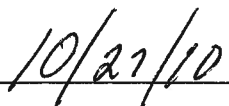
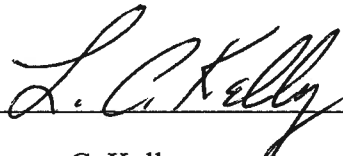
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United State Environmental Protection Agency

Region V

Certificate of Service

I hereby certify that the following **Responses to Administrative Complaint and Compliance Order and Motion to Amend Answers** were sent this day in the following manner to the addressees listed below.

 <hr style="width: 200px; margin: 0 auto;"/>	 <hr style="width: 400px; margin: 0 auto;"/>
Date	Laurence C. Kelly

Mercury Vapor Processing Technologies, Inc.

One Original and One Copy by Fedex Delivery to:
 LaDawn Whitehead
 Regional Hearing Clerk
 U.S. EPA, Region V, MC-E-19J
 77 West Jackson Blvd.
 Chicago, IL 60604-3590

Copy by Fedex Delivery to:
 Thomas Williams

Office of Regional Counsel (C-14J)
U.S. Environmental Protection Agency
77 West Jackson Blvd.
Chicago, IL 60604-3590

Copy by Fedex Delivery to:
Judge Barbara A. Gunning
Office of Administrative Law Judges
U.S. Environmental Protection Agency
1099 14th Street, NW, Suite 350
Washington, DC 20005