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HARBOR FREIGHT TOOLS Quality Tools at Ridiculously Low Prices

March 25, 2019

VIA EMAIL

Ms. Amanda Cotton
Minnesota Pollution Control Agency
Land & Air Compliance Section
Industrial Division
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

RE:

Rechargeable Battery Recycling Report for 2017-2018

Harbor Freight Tools USA, Inc., Calabasas, CA

Dear Ms. Cotton:

Please consider this letter our 2019 Rechargeable Battery Report for Harbor Freight Tools USA, Inc. ("Harbor Freight") which covers the years of 2017-2018. This report includes the information we are required to report in accordance with Minnesota regulations and the Harbor Freight Tools plan.

- 1. Harbor Freight sold the total weight of rechargeable batteries at Minnesota store locations and through our e-commerce process to Minnesota addresses:
 - a. 2017 13,214 lbs.
 - b. 2018 14,561 lbs.
- 2. Harbor Freight sent out from Minnesota stores for recycling through our vendor, US Ecology, the following weight of batteries:
 - a. 2017 227 lbs.
 - b. 2018 468 lbs.
- 3. This results in the following capture rates:
 - a. 2017 1.7%
 - b. 2018 3.2%

Please note: This capture rate does not comprehend the batteries that we harvest at our asset recovery facility when damaged products are evaluated for resale potential. In addition, most rechargeable batteries last many years and are not returned for recycling on an annual basis.

Harbor Freight Tools continues to promote the return of defective and used rechargeable batteries at the Harbor Freight store locations. We provide notice to consumers of our recycling program and a reminder that it is illegal to put rechargeable batteries in the garbage as provided by Minn. Stat. § 325E.125, subd. 4. Harbor Freight Tools has also updated its website with recycling directions.

Sincerely,

Rosanne Iwanicki

Environmental Compliance Manager

c: Tammy Stafford, Harbor Freight Tools USA, Inc. Susan Wiens, Environmental Law Group Ken Podpeskar, Environmental Law Group