



**Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report**

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**FACILITY INFORMATION:**

**Facility Name:** Frontier Lighting Inc

**On-Site Inspection Start Date:** 10/16/2009

**On-Site Inspection End Date:** 10/16/2009

**ME ID#:** 79745

**EPA ID#:** FLR000138941

**Facility Street Address:** 2090 Palmetto St, Clearwater, Florida 33765-2134

**Contact Mailing Address:** 2090 Palmetto St, Clearwater, Florida 33765-2134

**County Name:** Pinellas

**Contact Phone:** (727) 447-7676

**NOTIFIED AS:**

Non-Handler

**INSPECTION TYPE:**

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for CESQG (<100 kg/month) facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Kelly M. Honey, Environmental Specialist III

**Other Participants:** Theresa Hubbard, Accounting Manager; Steve Karinch, Warehouse Manager; Robert Soich, Environmental Specialist II

**LATITUDE / LONGITUDE:** Lat 27° 58' 32.6996" / Long 82° 45' 0.6768"

**SIC CODE:** 5063 - Wholesale trade - electrical apparatus and equipment

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Frontier Lighting, Inc., (Frontier) was inspected to determine its compliance with state and federal hazardous waste regulations. The facility notified the Department of Environmental Protection (Department) of its status as a universal waste lamp transporter. The inspection determined that Frontier is a generator of universal waste lamps and has the potential to generate conditionally exempt amounts of mercury contaminated wastes from the cleanup of broken mercury lamps. The inspectors were accompanied throughout the inspection by Theresa Hubbard, the Accounting Manager, and Steve Karinch, the Warehouse Manager. This was the first hazardous waste compliance inspection of the facility by the Department.

**Process Description:**

Frontier is a lighting supplier and distributor. According to staff, customers purchase lamps and other lighting supplies, including fluorescent and HID lamps, ballasts and fixtures, and perform the installations themselves. Frontier does not do any re-lamping. Customers who wish to have their spent lamps picked up for recycling are referred to Sellers Service, which also picks up Frontier's own spent lamps. Frontier also has RecyclePaks, complete with postage paid, available for sale to its customers. Customers fill the RecyclePaks with spent lamps and then ship them directly to Veolia Environmental Services for recycling. The only spent or waste lamps on site are generated on site, generally from materials handling operations in the warehouse (i.e., damaged boxes). Based on these discussions, Frontier is not a universal waste lamp transporter.

Company vehicles are serviced off site by Good Year or Dayton Andrews, and forklift maintenance is contracted out, but performed on site by Crown Equipment Corporation. Waste and spent lamps are stored in a small area set aside near the rear of the warehouse. When goods are damaged in the warehouse, usually a few lamps get broken, but the majority of lamps in the boxes are still usable. Damaged boxes are placed in this area to be opened and sorted by warehouse staff as time

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allows. Broken lamps are placed in 55-gallon drums or in boxes depending on the sizes of the pieces.

At the time of the inspection, there were several damaged boxes of lamps that needed to be sorted. The boxes were not properly labeled as containing universal waste lamps. There were also two 55-gallon drums of broken lamps that were open and unlabeled, and some pieces of broken lamp were observed around the drums. Staff were directed to immediately address the open drums and the uncontainerized pieces of broken lamps. They were also directed to sort through the boxes of damaged lamps and begin properly managing the ones determined to be waste lamps. It was noted that the waste lamps need to be managed appropriately upon generation, and that Frontier should be sorting damaged boxes right away. Universal waste lamp labels and the the Department's waste fluorescent lamp management Fact Sheet were provided during the inspection. Staff stated that the area would be cleaned up and that Sellers Service would be called to pick up the waste lamps right away. Documentation to this effect was submitted by Ms. Hubbard on October 22, 2009.

As indicated, at this location, Frontier is not transporting universal waste lamps. If Frontier elects to maintain its universal waste lamp transporter status for business purposes, it will have to comply with the applicable rules. Discussions with staff indicate that they were relatively unfamiliar with all the applicable transporter rules, including required training and records. A Notification Form (Form 8700-12FL) and associated instructions are enclosed to Frontier to correct the facility status from "transporter" to "generator." Complete and sign this form and return it to the address indicated on the top of it. A copy of Chapter 62-737, FAC, The Management Of Spent Mercury-Containing Lamps And Devices Destined For Recycling, is also enclosed for your information.

#### **New Potential Violations and Areas of Concern:**

##### **Checklist Independent Potential Violations and Areas of Concern**

Type:	Area Of Concern
Rule:	62-737.400(4)
Explanation:	<p>A universal waste transporter shall ensure that all its employees, including drivers, involved with the management of universal waste lamps or devices, are trained in the proper handling (e.g., packaging and preventing breakage) and applicable emergency cleanup and containment procedures. Written emergency procedures are to be kept on each one of the transporter's vehicles and at the business location of the handler or transporter, and shall be made available for inspection upon request by the Department.</p> <p>Frontier is currently notified as a universal waste lamp transporter. Discussions on site, however, indicate that operations at this facility do not include the transport of waste lamps. If Frontier Lighting, Inc., intends to maintain its status as a registered universal waste lamp transporter for business purposes, it must comply with rules applicable to transporters.</p>
Corrective Action:	<p>A Notification Form (Form 8700-12FL) is enclosed to correct the facility status from "universal waste lamp transporter" to "universal waste lamp generator." Complete and sign the form, and submit it to the address specified on the form.</p> <p>If Frontier elects to maintain its transporter status, it must comply with the applicable transporter rules.</p>

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Type:	Violation
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Rule: 273.13(d)(2), 273.14(e), 273.13(d)(1)

Explanation: In the area set aside for waste lamps, broken lamps were observed in two open drums, and there were some pieces of broken lamps observed outside the drums. There were also several boxes of good and waste lamps that were not in good condition. None of the containers were labeled. (corrected)

Corrective Action: After the inspection, the area was cleaned up, and the waste lamps were picked up for recycling by Sellers Services. Universal waste labels were provided for the drums used to store broken lamps. A Fact Sheet on waste lamp management was also provided.

### Summary of Potential Violations and Areas of Concern:

#### Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations			
273.13(d)(2), 273.14(e), 273.13(d)(1)		10/16/2009	In the area set aside for waste lamps, broken lamps were observed in two open drums, and there were some pieces of broken lamps observed outside the drums. There were also several boxes of good and waste lamps that were not in good condition. None of the containers were labeled. (corrected)

#### Areas of Concern

Rule Number	Area	Date Cited	Explanation
Checklist Independent Areas of Concern			
62-737.400(4)		10/16/2009	<p>A universal waste transporter shall ensure that all its employees, including drivers, involved with the management of universal waste lamps or devices, are trained in the proper handling (e.g., packaging and preventing breakage) and applicable emergency cleanup and containment procedures. Written emergency procedures are to be kept on each one of the transporter's vehicles and at the business location of the handler or transporter, and shall be made available for inspection upon request by the Department.</p> <p>Frontier is currently notified as a universal waste lamp transporter. Discussions on site, however, indicate that operations at this facility do not include the transport of waste lamps. If Frontier Lighting, Inc., intends to maintain its status as a registered universal waste lamp transporter for business purposes, it must comply with rules applicable to transporters.</p>

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**Conclusion:**

Based on the observations made during this inspection, Frontier was not in compliance with rules governing universal waste generators and transporters. The facility has since returned to compliance with respect to generator requirements. If Frontier intends to remain a universal waste transporter, however, it must still comply with applicable universal waste transporter rules.

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**Signed:**

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kelly M. Honey

**PRINCIPAL INSPECTOR NAME**

Environmental Specialist III

**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**

FDEP

**ORGANIZATION**

11/25/2009

**DATE**

Robert Soich

**INSPECTOR NAME**

Environmental Specialist II

**INSPECTOR TITLE**

NO SIGNATURE

**INSPECTOR SIGNATURE**

FDEP

**ORGANIZATION**

Theresa Hubbard

**REPRESENTATIVE NAME**

Accounting Manager

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

Frontier Lighting, Inc.

**ORGANIZATION**

Steve Karinch

**REPRESENTATIVE NAME**

Warehouse Manager

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

Frontier Lighting, Inc.

**ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.