

Thursby, Kim

From: Bonnie Bishop-Clark [bonnie@lightingresourcesinc.com]
Sent: Thursday, February 09, 2012 1:40 PM
To: Epost HWRS
Subject: Operating permit

This email is to confirm receipt of the email notification in regard to Lighting Resources application for operating permit.

*Best regards,
Bonnie*

*Bonnie Bishop-Clark
Southeast Branch Manager
Account Executive
Lighting Resources LLC
1007 SW 16th Lane
Ocala, Florida 34471
866-961-9100 / 904-881-2229 (CELL)
352-509-3001 / 352-509-3012 (Fax)
bonnie@lightingresourcesinc.com*

Thursby, Kim

From: Epost HWRS
Sent: Thursday, February 09, 2012 1:28 PM
To: 'bonnie@lightingresourcesinc.com'
Cc: Bahr, Tim; Coates, John; White, John; Kraemer, Janine; 'brian@lightingresourcesinc.com'; 'dan.gillespie@lightingresourcesinc.com'; 'eric.kramer@shawgrp.com'; 'Pamela.Thomas@shawgrp.com'; Kothur, Bheem; Tripp, Anthony
Subject: Lighting Resources, LLC, Florida, FLR 000 070 565;First Notice of Deficiencies
Attachments: 2-9-12-Lighting Resources, Inc. Request for Additional Info.Receipt.pdf
Tracking:

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation Section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection

E-Mail Address: epost_hws@dep.state.fl.us



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

February 09, 2012

Sent Via E-mail

bonnie@lightingresourcesinc.com

Ms. Bonnie Bishop-Clark
Southeast Branch Manager
Lighting Resources, LLC
1007 SW 16th Lane
Ocala, Florida 34471

**Subject: Lighting Resources, LLC, Florida, FLR 000 070 565
Operating Permit No. 0309339-HO-001
Marion County
First Notice of Deficiencies**

Dear Ms. Bishop-Clark:

Your renewal permit application dated December 15, 2011 for a mercury recovery permit has been reviewed and found to be incomplete. The required information and amendments necessary to complete your application are itemized in the enclosed Notice of Deficiencies.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the requested additional information pursuant to Florida Administrative Code (F.A.C.) Rule 62-737.800 and Chapter 403.722, Florida Statutes (F.S.).

The Department will be contacting you to schedule a meeting or conference call to discuss these comments. Additional communications will be scheduled as needed prior to your submittal of an official response to minimize the time and effort required to formulate adequate replies to the comments. This exchange of ideas will assist you in developing a complete and adequate response that should eliminate the need for additional official responses and therefore accelerate the permit renewal process.

An official response to these comments is due within thirty (30) days of receipt of this document. Additional time can be granted if it becomes apparent during the response process that more time is needed.

Ms. Bonnie Bishop-Clark
February 09, 2012
Page Two

If you would like to arrange a meeting or have any questions, please call me at 850-245-8781 or Bheem.kothur@dep.state.fl.us

Sincerely,



Bheem R. Kothur
Professional Engineer III
Hazardous Waste Regulation

BK/bk

Enclosure; Attachment

cc via e-mail w/ enclosure:

John White, FDEP/ Central District, john.white@dep.state.fl.us

Janine Kraemer, FDEP/ Central District, Janine.kraemer@dep.state.fl.us

Brian T. Anderson, Lighting Resources, Inc. brian@lightingresourcesinc.com

Daniel P. Gillespie, Lighting Resources, Inc.

dan.gillespie@lightingresourcesinc.com

Eric Kramer, Shaw Environmental, eric.kramer@shawgrp.com

Pam Thomas, Shaw Environmental, Pamela.Thomas@shawgrp.com

ATTACHMENT

Lighting Resources, LLC

Facility I.D. No.: FLR 000 070 565; Permit No.: 0309339-HO-001

First Notice of Deficiencies

February 09, 2012

Specific Comments:

1. Organization of Application table (second page of application) and Table of Contents: There are some inconsistencies related to some of the titles of sections. Please revise these items, so they are consistent.
2. Florida DEP Application Form # 62-737.900(2), Page 14, and Item B.1- Site Information: Please verify Latitude and Longitude for the facility and revise as appropriate.
3. Florida DEP Application Form # 62-737.900(2), Page 15, and Item D.3 Operating Information: Please add information for High Intensity Discharge (HID) lamps, and Universal Waste (UW) materials to the list.
4. Florida DEP Application, Form #62-737.900(2), Page 16 and Item 4: Mercury Containing Lamps (MCLs), Processed Lamps Quantity should be 21, 000 lbs instead of 16, 800 lbs (assuming 28 drums at 750 pounds each). Please review and revise as appropriate.
5. Engineering Report: Sub-Section 1.2-Facility Overview, Second Paragraph, Page 1: The statement is made that “separated glass and metal materials will **not** contain mercury and therefore will be recycled”. Since the glass and metal will contain mercury (even if the concentration is small), a more accurate statement would be “separated glass and metal materials passing TCLP for mercury will be recycled”.
6. Engineering Report: Sub-Section 2.3 Surface Waters and Site Drainage, Page 7: Please indicate if the facility is serviced by a septic system or connects to a municipal sewage system.
7. Engineering Report: Sub-Section 1.2-Facility Overview, Second Paragraph, Last Sentence, Page 1: Please see page 18 and describe the types of batteries that will be stored at the facility.
8. Engineering Report, Sub-Section 3.1 – Overview of Facility Operations, Page 19, Batteries: Please expand this paragraph to include all types of batteries.
9. Engineering Report, Sub-Section 3.4 -Facility Personnel Requirements and Training, Page 20: Please expand training requirements to meet the requirements of 40 CFR Part 265.16, because the facility is a Large Quantity Generator (LQG) in accordance with subparagraph 62-737.800(4)(e)(1)., Florida Administrative Code, Hg Processors.
10. Engineering Report, Sub-Section 3.9 -Waste Rejection Procedure, Page 24: Please add language to the effect that a reject load log will be maintained at the facility, available for inspection. This log will need to include material for the past three years of operation.
11. Engineering Report, Sub-Section 3.10 - Lamp and Universal Waste Handling and Containerization, Page 25, Last Paragraph: This paragraph discusses container marking and labeling but it does not mention dating the containers. Please review and revise as appropriate.
12. Engineering Report, Sub-Section 3.11 - Final Destination of Materials, Page 26: Please specify that each shipment of glass and metal should be tested prior to shipment offsite to ensure

- equipment continues to operate correctly and mercury concentration limits are being met. Please review and revise as appropriate.
13. Engineering Report, Sub-Section 3.12 - Processing Throughput and Staging/Storage Volumes, Page 27: Will there be a log to review the processing throughputs, and staging/storage volumes? Please review and address as appropriate.
 14. Engineering Report, Table 3-2, Page 28: Lithium batteries need to be stored in a location or in a manner, such that water or incompatible fire extinguishing material can not affect them. Please review and revise as appropriate.
 15. Engineering Report, Table 3-2 - Clean Glass, Page 28: The estimated material quantities for “Clean” Glass, and Phosphor Powder, should be “11,250” lbs instead of “36,000” lbs assuming 15 drums at 750 pounds per drum. Please review and revise the quantities as appropriate.
 16. Engineering Report, Sub-Section 3.13 -Load Checking Program, Page 29: The facility should maintain a load rejection log. Please review this paragraph and add such requirement. Please refer to Item 10 above.
 17. Engineering Report, Lamp Processing Flow Diagram, Page 34: Please add another Flow Diagram for the HID Lamp Recovery Process similar to the Lamp Processing Flow Diagram. Also, add an item to the figure on Page 34 that indicates where material is stored prior to transport.
 18. Engineering Report, Sub-Section 3.20 – Air Monitoring and Air Emission Control, Page 38: In paragraph 4 please indicate which PEL (OSHA or Lighting Resources) is being monitored to determine when air filtration media is deemed “saturated”. Preferably, indicate a mercury air concentration that will be set as the upper concentration limit.
 19. Engineering Report, Sub-Section 3.22 - Maintenance Program, Page 41: Weekly inspections of the HW storage area are not mentioned. There are inspection check lists in Appendix D but we are not sure these are the exact forms or just when the inspections will be conducted. Please review and clarify as appropriate.
 20. Engineering Report, Sub-Section 4.2, Emergency Contact Information, Page 42: In addition to the phone numbers, we require addresses for the emergency contacts. Please review and revise as appropriate.
 21. Engineering Report, Emergency Contacts, Page 43: Please correct the phone number for Florida DEP as “(407) 897-4100” instead of “(407) 897-4303”. Also add to this list the State Warning Point number as “(800) 320-0519”.
 22. Engineering Report, Sub-Section 4.6, Fire and Explosion Emergency Procedures, Page 47, and Drawing D7: Indicate where personnel evacuate to during an evacuation.
 23. Engineering Report, Sub-Section 5.6 -Personnel Training, Page 54: Please add position description to meet 40 CFR Part 265.16
 24. Engineering Report, Sub-Section 6.5, Air Monitoring and Emission Control Procedures, Page 61: Please indicate what specific concentration of mercury corresponds to “well below the OSHA PEL”.
 25. Engineering Report, Sub-Section 7.1, Closure Procedures, Page 62: Please describe the procedure if “visual contamination” is evident.
 26. Engineering Report, Sub-Section 7.3, Decontamination Procedures, Page 63: Please describe the procedure if contamination is observed.
 27. Engineering Report, Table 7-1, Maximum Materials Inventory at Closure, Page 63: The Unprocessed MCLs, material volume estimated in Assumptions column should be “69, 552”

- lamps instead of “75,000” lamps. Also correct the referenced Table as “3-2” instead of “3-1” in entire Assumptions column. Please correct this discrepancy throughout Table 7-1.
28. Engineering Report, Sub-Section 7.3, Decontamination Procedures, Page 64, Confirmation of Soil sampling: Soil sampling is applicable and will be required. Please revise to include.
 29. Engineering Report, Table 7-3- Closure Cost Estimate: The facility addressed a number of items as no cost (n/c) under unit cost column. The Department does not accept the no cost concept for the unit cost in calculating the cost estimate. Please review and revise Table 7-3 to include the unit cost for those items while estimating the total closure costs.
 30. Engineering Report, Table 7-3, Page 4 of 4: Five (5) percent contingency is not acceptable. Please review and revise the contingency at a minimum of ten (10) percent.
 31. Appendix D – Record Keeping Forms, Daily Activity Report: This form tracks levels of mercury vapor in the facility. It has a space for the time the analysis was performed, but there does not appear to be space for the date, the person performing the analysis, or the specific instrument used for the analysis. Please revise accordingly.
 32. Appendix E – Sampling and Analysis SOP, Sub-Section 2.3 – Sampling Equipment and Sample Container Decontamination, Page 4: Directions are given in Item 4 for the preparation of 10% nitric acid solutions. Is this being prepared on-site? If so, where will the concentrated nitric acid be stored and what fume hood will be used to prepare this solution?
 33. Appendix E – Sampling and Analysis SOP, Sub-Section 2.3 – Sampling Equipment and Sample Container Decontamination, Page 6, Procedure 2: Will grinding of endcap assemblies be performed at this facility? If so, please specify where the grinding will be performed and what measures are taken to protect personnel from any mercury that might be present in fine ground material that is generated.
 34. Appendix E – Sampling and Analysis SOP, Sub-Section 2.3 – Sampling Equipment and Sample Container Decontamination, Page 11, Liquid Waste Sampling Protocol/Procedures: Sample aliquots from different locations will not be mixed together but shall be analyzed as individual aliquots. Please revise the text accordingly.
 35. Appendix E – Sampling and Analysis SOP, Sub-Section 2.3 – Sampling Equipment and Sample Container Decontamination, Page 15, Composite Soil Sampling: Soil samples from different locations will not be mixed together but shall be analyzed as individual samples. Please revise the text accordingly.

General Comments:

36. Drawings- D-1 through D-7: The drawings appear to be preliminary and these drawings are not signed and sealed by a professional surveyor nor a professional engineer registered in State of Florida. Please submit the final drawings signed and sealed by a professional surveyor and a professional engineer as appropriate.
37. Eyewash Fountain and Safety Showers: None of the drawings show an eyewash fountain or safety showers at the facility. The department recommends that the facility must install eyewash fountains and safety showers at appropriate locations at the facility.
38. No Smoking signs in hazardous areas: Please make sure that the signs are posted at appropriate places.

39. Florida DEP Application Form # 62-737.900(2), Page 12, Item A-10: The area code of the phone number should be (352).
40. Florida DEP Application Form # 62-737.900(2), Page 16, Item D-4: You list the storage of Clean Lamp Glass (Cullet) in a “1-cu.yd. rolloff”. Is this correct?