Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Lighting Resources LLC

On-Site Inspection Start Date: 08/16/2012 **On-Site Inspection End Date:** 08/16/2012

ME ID#: 40403 **EPA ID#:** FLR000070565

Facility Street Address: 1007 SW 16th Ln, Ocala, Florida 34474

Contact Mailing Address: 1007 SW 16th Lane, Ocala, Florida 34471

County Name: Marion **Contact Phone:**

NOTIFIED AS:

Non-Handler
Transporter

INSPECTION TYPE:

Routine Inspection for TSD Facility Unit Type(s)

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for LQG (>1000 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector:	John White, Environmental Specialist
Other Participants:	Danielle Bentzen, Environmental Specialist; Janine Kraemer, Environmental Manager; Heath Clark, Operations Manager

LATITUDE / LONGITUDE: Lat 29° 10' 20.7785" / Long 82° 8' 49.0004"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

On August 16, 2012, John White, Janine Kraemer, and Danielle Bentzen, Florida Department of Environmental Protection (FDEP), inspected Lighting Resources for compliance with state and federal hazardous waste regulations. Heath Clark, Operations Manager, accompanied the inspectors.

Lighting Resources, located at 1007 SW 16th Lane, Ocala, Marion County, Florida, operates a facility for recovery of mercury from mercury containing lamps and devices under RCRA Permit 0309339-HO-001. The permit was issued July 6, 2012, and expires July 6, 2017.

Lighting Resources notified FDEP as a Transporter and Large Quantity Handler of Universal Waste Lamps and Devices and received EPA identification number FLR000070565 on February 17, 2011. Lighting Resources began mercury lamp processing operations at this location on July 11, 2012.

This is the initial inspection of Lighting Resources by FDEP. The facility operates Monday through Friday 8:00 AM to 5:00 PM and is connected to City of Ocala drinking water and sanitary sewer services.

Process Description:

Lighting resources is a hazardous waste transporter, a universal waste transporter and handler, and a recycler of mercury containing lamps.

Upon arriving on site, inspectors noted the signage on the building and fence do not match the language identified in permit condition Part I, Item 24 "Notice - Unauthorized Personnel Are not Permitted Inside Plant" and "Notice - All Visitors Must Register At Office" [403.727(1)(c), Florida Statutes (FS)].

Waste coming into the facility is unloaded and placed inside the warehouse in the counting area where the number of containers described on the shipping paper can be verified. From there, the waste is moved to the processing storage area.

Wastes that come in on one shipping paper are kept together on a pallet and usually shrink wrapped. A copy of the shipping paper is kept with the containers. A written log is maintained by personnel identifying the shipping paper number, the generator of the waste, the date the waste arrived on-site, and the date the waste was processed.

Seven rows of wastes were found in the processing storage area along with two 55-gallon drums containing metal halide lamps that have been consolidated. It was recommended the Lighting Resources labels be modified to meet the labeling requirements of universal waste lamps so that if a generator does not properly label a container, the Lighting Resources label on containers shipped to customers will meet regulatory requirements.

Twelve drums of mercury containing phosphor powder and one drum containing floor sweepings were stored adjacent to the processing storage area. The drums were properly labeled "Hazardous Waste" and were marked with accumulation start dates. Four drums of non-PCB ballasts were stored adjacent to the processing storage area.

Along one wall were the following containers: One drum of nickel metal hydride batteries, dated 7-7-12; two drums of nickel cadmium batteries, one from a customer that is just being stored prior to shipment off-site and one the facility is filling, dated 7-7-12; one drum for alkaline batteries, dated 7-7-12; one drum for lithium batteries, dated 7-7-12; and one drum for lead acid batteries, dated 7-30-12.

In the processing area a Balcan MP8000 lamp processing plant is used for recycling mercury containing lamps. The plant operates all day during each business day. Lamps are processed by type. The lamps are fed into the plant on a conveyor belt and pass through crushers. Phosphor powder is continuously pulled out of the system by air handlers and glass and metal end caps are separated and fall out into separate containers. One machine handles tubes and a second, multi-purpose machine handles crushed lamps, HID lamps, and other miscellaneous lamps.

Phosphor powder settles out of the air handlers into two separate drums. One drum was dated 8-13-12 and the second was dated 8-15-12. Both drums were properly labeled as hazardous waste.

Nineteen cubic yard boxes of glass were in storage along with four containers of metal end caps.

RECORDS REVIEW
An electronic form maintained on the computer tracks Ballasts, Batteries, Lamps, Mercury Devices, and Miscellaneous (electronic waste) wastes. The form tracks wastes received by month and includes the date the waste was received and the date it was processed.

Weekly sampling has been completed as required. An initial mercury result of 4.1 mg/kg for secondary metal end caps during the first week of operations resulted in changes to the process. High Intensity Discharge (HID) lamps are now processed separately so they can be properly crushed and materials separated. The metal end caps were reprocessed and the sample result was 0.53 mg/kg. A result of 1.9 mg/kg was found for processed lamp glass during week four; however, this result is below the 3 mg/kg weekly composite limit found in the permit. The moving weekly twelve week average is below 1.0 mg/kg as required by the permit but is not actively tracked as required by permit condition Part II B, Item 10 [403.727(1)(c), Florida Statutes (FS)].

Review of daily closing inspections and daily air monitoring inspection logs found no violations. It was noted the facility is not completing weekly inspections of the less than 90-day hazardous

waste accumulation area [62-730.160(6), F.A.C.]. A sample inspection log was provided to Heath Clark on 8/20/2012.

Training has been completed; however, a training form contained in the permit application that lists each specific training class and date has not been completed yet. The form must be completed and a copy provided to FDEP.

A review of shipping papers and manifests found only one hazardous waste manifest. Lighting Resources must ensure hazardous waste received from off-site generators that cannot be processed by this facility does not remain on-site for greater than 24 hours.

Mr. Clark was asked to update the telephone number for the FDEP's Emergency Response group contained in the printed copy of the Contingency Plan.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	403.727(1)(c)
Explanation:	It is unlawful for any hazardous waste generator, transporter, or facility owner or operator to: Fail to comply with a permit. Specifically, Lighting Resources failed to meet the following requirements of Permit 0309339-HO-001: conditions Part i, Item 8, Signage; Part II B, Item 10, Maintain rolling 12 week average of analytical results.
Corrective Action:	Within 15 days of receipt of this report Lighting Resources must provide a photograph documenting signage meets the requirements identified in the permit and a copy of a log documenting the facility is actively tracking the 12 week rolling average of analytical results.

Type:	Violation
Rule:	62-730.160(6)
Explanation:	Generators of hazardous waste who accumulate hazardous waste on-site under 40 CFR 262.34, shall maintain written documentation of the inspections required under 40 CFR Part 265. The generator shall keep the written documentation of the inspections under this section for at least three years from the date of the inspection. At a minimum, this documentation shall include the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions. Lighting Resources was not documenting weekly inspections of hazardous waste containers.
Corrective Action:	Within 15 days of receipt of this report, Lighting Resources must provide a copy of a completed weekly inspection logs documenting the facility is actively inspecting containers of hazardous waste that were generated by Lighting Resources.

Conclusion:

Lighting Resources was inspected as a hazardous waste transporter, universal waste transporter, and permitted mercury processing facility and was not in compliance at the time of this inspection.

Lighting Resources must inspect containers of hazardous waste generated on-site at least weekly and document those inspections. Signage must meet the requirements identified in the Permit. A rolling 12 week average of mercury analytical results must be maintained.

During the inspection it was also recommended Lighting Resources review the permit conditions that control the volume of phosphor powder, glass, and processed metals that can be stored on site and request a permit modification, if necessary, to ensure the facility operates in a sustainable manner.

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.

John White	Environmental Specialist
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**
	FDEP
	ORGANIZATION

Supervisor: **Janine Kraemer**

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.