



Lighting Resources LLC

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Ocala, Florida 34471
(855) 502-3001 Fax (352) 509-3012
florida@lightingresourcesinc.com

October 3, 2012

John White
Environmental Specialist
FDEP
Central District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Non-Compliance Letter: OCD-HW-12-351

Dear Mr. White:

Following is the response to the FDEP letter of Non-Compliance dated September 26, 2012.

- 1) Weekly inspection of containers of hazardous waste generated on-site. Heath Clark received an inspection log via email from John White. This log is being used weekly (Fridays) since received. Copies of the weekly inspection logs are attached. Previously Lighting Resources had been conducting 2X daily inspections of these containers. LRL addressed these inspections by utilizing the "Inspection Schedule and Checklist" provided in the permit application. But the form did not specify the drums as "HW", it is listed as "Containers". In addition, we address inspecting the Phosphor Powder, Sweeping/PPE debris in the "Daily Closing Report" in sections IV and VI, provided in the permit application.
- 2) Signage. The bi-lingual signs have been installed on the west wall of Warehouse A as described in the permit. In addition, the same signs were installed on both exterior doors entering the warehouse. Pictures are attached.
- 3) Maintain rolling 12 week average of analytical results. LRL maintains the weekly test results along with the complete Test America report, the manifests to ship the processed glass and the return to generator manifests in a binder labeled "Sampling and Analysis". LRL internally created an electronic spreadsheet providing the test sample date, container #/weight, sample week #/date, test results, ship date and ship to destination. The intent was to calculate the 12 week rolling average at the end of the 12th week. LRL has now created a simple spreadsheet consisting of only the test week and the test results for the processed glass and metals. This spreadsheet is attached which includes the 12 week average results. Our first "12th week" ended 9/28/12. This new spreadsheet will be updated weekly and placed in the front of the Sampling and Analysis binder.

In the inspection report 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. The number has been changed to reflect 407-897-4339. A copy of the corrected page is attached.

LRL believes this response letter addresses the issues listed in the "Non-Compliance Letter" If you have any questions, please contact me at 352-509-3001.

Sincerely,

A handwritten signature in black ink that reads "Bonnie Bishop-Clark".

Bonnie Bishop-Clark
Southeast Branch Manager
Lighting Resources LLC

805 E. Francis Street
Ontario, CA. 91761
909-923-7252

1522 E. Victory St., Ste. #4
Phoenix, AZ. 85040
602-276-4278

498 Park 800 Drive
Greenwood, IN. 46143
317-888-3889

101 E. Bowie St.
Fort Worth, TX. 6110
817-921-1440

WEEKLY INSPECTION LOG

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 8.24.12

Time: 4:00 PM

Accumulation Area Inspected: Calcium Phosphate Powder Number of Containers: 6

Are all containers in good condition?	Yes X	No ____
Is there any evidence of leaks or spills?	Yes ____	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No ____
Are all containers marked with an accumulation start date?	Yes X	No ____
Are all containers closed?	Yes X	No ____
Is there adequate aisle space between rows of drums?	Yes X	No ____
Is spill control equipment available?	Yes X	No ____

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 8.31.12

Time: 4:20 PM

Accumulation Area Inspected: Calcium Phosphate Powder Number of Containers: 9

Are all containers in good condition?	Yes X	No ____
Is there any evidence of leaks or spills?	Yes ____	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No ____
Are all containers marked with an accumulation start date?	Yes X	No ____
Are all containers closed?	Yes X	No ____
Is there adequate aisle space between rows of drums?	Yes X	No ____
Is spill control equipment available?	Yes X	No ____

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

WEEKLY INSPECTION LOG

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 9.7.12

Time: 3:45 PM

Accumulation Area Inspected: Calcium Phosphate Powder Number of Containers: 15

Are all containers in good condition?	Yes X	No___
Is there any evidence of leaks or spills?	Yes___	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No___
Are all containers marked with an accumulation start date?	Yes X	No___
Are all containers closed?	Yes X	No___
Is there adequate aisle space between rows of drums?	Yes X	No___
Is spill control equipment available?	Yes X	No___

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 9.14.12

Time: 4:15 PM

Accumulation Area Inspected: Calcium Phosphate Powder Number of Containers: 0

Are all containers in good condition?	Yes X	No___
Is there any evidence of leaks or spills?	Yes___	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No___
Are all containers marked with an accumulation start date?	Yes X	No___
Are all containers closed?	Yes X	No___
Is there adequate aisle space between rows of drums?	Yes ___	No___ N/A
Is spill control equipment available?	Yes X	No___

Observations: Only two drums attached to processing machine. None is storage. _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

WEEKLY INSPECTION LOG

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 9.21.12

Time: 4:40 PM

Accumulation Area Inspected: Calcium Phosphate Powder Number of Containers: 6

Are all containers in good condition?	Yes X	No___
Is there any evidence of leaks or spills?	Yes___	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No___
Are all containers marked with an accumulation start date?	Yes X	No___
Are all containers closed?	Yes X	No___
Is there adequate aisle space between rows of drums?	Yes X	No___
Is spill control equipment available?	Yes X	No___

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 9.28.12

Time: 4:15 PM

Accumulation Area Inspected: Calcium Phosphate Powder Number of Containers: 9

Are all containers in good condition?	Yes X	No___
Is there any evidence of leaks or spills?	Yes___	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No___
Are all containers marked with an accumulation start date?	Yes X	No___
Are all containers closed?	Yes X	No___
Is there adequate aisle space between rows of drums?	Yes X	No___
Is spill control equipment available?	Yes X	No___

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

WEEKLY INSPECTION LOG

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 8.24.12

Time: 4:00 PM

Accumulation Area Inspected: Hg contaminated debris (Floor sweepings) Number of Containers: 1

Are all containers in good condition?	Yes X	No___
Is there any evidence of leaks or spills?	Yes___	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No___
Are all containers marked with an accumulation start date?	Yes X	No___
Are all containers closed?	Yes X	No___
Is there adequate aisle space between rows of drums?	Yes X	No___
Is spill control equipment available?	Yes X	No___

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 8.31.12

Time: 4:20 PM

Accumulation Area Inspected: Hg contaminated debris (Floor sweepings) Number of Containers: 1

Are all containers in good condition?	Yes X	No___
Is there any evidence of leaks or spills?	Yes___	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No___
Are all containers marked with an accumulation start date?	Yes X	No___
Are all containers closed?	Yes X	No___
Is there adequate aisle space between rows of drums?	Yes X	No___
Is spill control equipment available?	Yes X	No___

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

WEEKLY INSPECTION LOG

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 9.7.12

Time: 3:45 PM

Accumulation Area Inspected: Hg contaminated debris (Floor sweepings) Number of Containers: 1

Are all containers in good condition?	Yes X	No___
Is there any evidence of leaks or spills?	Yes___	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No___
Are all containers marked with an accumulation start date?	Yes X	No___
Are all containers closed?	Yes X	No___
Is there adequate aisle space between rows of drums?	Yes X	No___
Is spill control equipment available?	Yes X	No___

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 9.14.12

Time: 4:15 PM

Accumulation Area Inspected: Hg contaminated debris (Floor sweepings) Number of Containers: 1

Are all containers in good condition?	Yes X	No___
Is there any evidence of leaks or spills?	Yes___	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No___
Are all containers marked with an accumulation start date?	Yes X	No___
Are all containers closed?	Yes X	No___
Is there adequate aisle space between rows of drums?	Yes X	No___
Is spill control equipment available?	Yes X	No___

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

WEEKLY INSPECTION LOG

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 9.21.12

Time: 4:40 PM

Accumulation Area Inspected: Hg contaminated debris (Floor sweepings) Number of Containers: 1

Are all containers in good condition?	Yes X	No___
Is there any evidence of leaks or spills?	Yes___	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No___
Are all containers marked with an accumulation start date?	Yes X	No___
Are all containers closed?	Yes X	No___
Is there adequate aisle space between rows of drums?	Yes X	No___
Is spill control equipment available?	Yes X	No___

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 9.28.12

Time: 4:15 PM

Accumulation Area Inspected: Hg contaminated debris (Floor sweepings) Number of Containers: 1

Are all containers in good condition?	Yes X	No___
Is there any evidence of leaks or spills?	Yes___	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No___
Are all containers marked with an accumulation start date?	Yes X	No___
Are all containers closed?	Yes X	No___
Is there adequate aisle space between rows of drums?	Yes X	No___
Is spill control equipment available?	Yes X	No___

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

WEEKLY INSPECTION LOG

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 8.24.12

Time: 4:00 PM

Accumulation Area Inspected: Hg contaminated debris (PPE) Number of Containers: 1

Are all containers in good condition?	Yes X	No___
Is there any evidence of leaks or spills?	Yes___	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No___
Are all containers marked with an accumulation start date?	Yes X	No___
Are all containers closed?	Yes X	No___
Is there adequate aisle space between rows of drums?	Yes X	No___
Is spill control equipment available?	Yes X	No___

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 8.31.12

Time: 4:20 PM

Accumulation Area Inspected: Hg contaminated debris (PPE)

Number of Containers: 1

Are all containers in good condition?	Yes X	No___
Is there any evidence of leaks or spills?	Yes___	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No___
Are all containers marked with an accumulation start date?	Yes X	No___
Are all containers closed?	Yes X	No___
Is there adequate aisle space between rows of drums?	Yes X	No___
Is spill control equipment available?	Yes X	No___

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

WEEKLY INSPECTION LOG

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 9.7.12

Time: 3:45 PM

Accumulation Area Inspected: Hg contaminated debris (PPE) Number of Containers: 1

Are all containers in good condition?	Yes X	No ____
Is there any evidence of leaks or spills?	Yes ____	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No ____
Are all containers marked with an accumulation start date?	Yes X	No ____
Are all containers closed?	Yes X	No ____
Is there adequate aisle space between rows of drums?	Yes X	No ____
Is spill control equipment available?	Yes X	No ____

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 9.14.12

Time: 4:15 PM

Accumulation Area Inspected: Hg contaminated debris (PPE) Number of Containers: 1

Are all containers in good condition?	Yes X	No ____
Is there any evidence of leaks or spills?	Yes ____	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No ____
Are all containers marked with an accumulation start date?	Yes X	No ____
Are all containers closed?	Yes X	No ____
Is there adequate aisle space between rows of drums?	Yes X	No ____
Is spill control equipment available?	Yes X	No ____

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

WEEKLY INSPECTION LOG

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 9.21.12

Time: 4:40 PM

Accumulation Area Inspected: Hg contaminated debris (PPE) Number of Containers: 1

Are all containers in good condition?	Yes X	No___
Is there any evidence of leaks or spills?	Yes___	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No___
Are all containers marked with an accumulation start date?	Yes X	No___
Are all containers closed?	Yes X	No___
Is there adequate aisle space between rows of drums?	Yes X	No___
Is spill control equipment available?	Yes X	No___

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 9.28.12

Time: 4:15 PM

Accumulation Area Inspected: Hg contaminated debris (PPE) Number of Containers: 1

Are all containers in good condition?	Yes X	No___
Is there any evidence of leaks or spills?	Yes___	No X
Are all containers labeled "Hazardous Waste"?	Yes X	No___
Are all containers marked with an accumulation start date?	Yes X	No___
Are all containers closed?	Yes X	No___
Is there adequate aisle space between rows of drums?	Yes X	No___
Is spill control equipment available?	Yes X	No___

Observations: _____

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date

Warehouse A West Wall

NOTICE
All Visitors Must
Register at Office
AVISO
Todos Los Visitantes Deben
Registrar en la Oficina

NOTICE
Unauthorized Persons Not
Permitted Inside
AVISO
Personas No Autorizadas No son
Permitidas Dentro de La Planta

9

8

Warehouse A West Wall

NOTICE
All Visitors Must
Register at Office.

AVISO
Todos Los Visitantes Deben
Registrarse en la Oficina.

NOTICE
Unauthorized Personnel Are
Not Permitted Inside Plant.

AVISO
Personas No Autorizadas, No están
Permitidas Dentro de la Planta.

8

Warehouse A (Street Side)

NOTICE
EMPLOYEES
ONLY



NOTICE
All Visitors Must
Register at Office.

AVISO
Todos Los Visitantes Deben
Registrarse en la Oficina.

NOTICE
Unauthorized Personnel Are
Not Permitted Inside Plant.

AVISO
Personas No Autorizadas, No están
Permitidas Dentro De La Planta.

Warehouse A (Dock side)

NOTICE

All Visitors Must
Register at Office.

AVISO

Todos Los Visitantes Deben
Registrarse en la Oficina.



NOTICE

Unauthorized Personnel Are
Not Permitted Inside Plant.

AVISO

Personas No Autorizadas, No están
Permitidas Dentro De La Planta.

LIGHTING RESOURCES Rolling 12 week average of analytical results Total Hg

WEEK	DATE	Results (Glass)	Results Metals (1)	Results Metals (2)
Week 1	7/13/2012	0.15PPM	0.63PPM	4.1PPM retest 0.53PPM
Week 2	7/20/2012	0.78PPM	0.84PPM	0.09PPM
Week 3	7/27/2012	0.34PPM	0.30PPM	0.82PPM
Week 4	8/3/2012	1.9PPM	0.019PPM	0.22PPM
Week 5	8/10/2012	0.35PPM	0.042PPM	0.15PPM
Week 6	8/17/2012	0.20PPM	0.037PPM	0.037PPM
Week 7	8/24/2012	0.029PPM	0.094PPM	0.018PPM
Week 8	8/31/2012	0.67PPM	0.26PPM	0.013PPM
Week 9	9/7/2012	1.9PPM	2.2PPM	0.059PPM
Week 10	9/14/2012	2.9PPM	0.012PPM	0.011PPM
Week 11	9/21/2012	0.41PPM	0.27PPM	0.068PPM
Week 12	9/28/2012	0.26PPM	0.013PPM	0.012PPM
12 Week Average		0.90PPM	0.39PPM	0.17PPM

period of three years.

6. Notify the applicable local, state, and federal agencies of incident as required by specific regulations.
7. Document incident and response, and maintain documentation on file for a minimum period of three years.

If a spill or release of mercury occurs en route to the Facility, it will be the duty of the Emergency Coordinator to provide the appropriate emergency response to prevent a threat to life or the environment. The Emergency Coordinator will be advised of any spill immediately and will make the necessary decisions necessary to implement an emergency response plan. The Emergency Coordinator will implement the procedures outlined below.

Emergency Coordinator and Driver Procedures for Mercury Spill En Route to Facility

1. Quickly evaluate the situation to determine if any injuries are involved. If serious injuries are involved, quickly move any injured parties to a safe location (as necessary) and notify Ocala 911 Emergency Services relaying the site location, emergency situation, and assistance needed. Note, move injured parties to safety ONLY if it can be done without threat of additional injury. If movement is not possible, immediately place the injured party on oxygen.
2. Notify all personnel not wearing respirators to evacuate the affected spill area. Use vehicle Warning Triangles to mark the spill area and to warn other motorists of the accident site.
3. Begin and/or supervise first aid on injured personnel. Immediately cover any and all open wounds to protect from mercury exposure. Continue first aid until relieved by emergency services personnel.
4. Drivers will put on appropriate PPE (respirator, Tyvek suit, gloves, etc.), and cover any and all mercury contaminated materials leaking or seeping from the vehicle with a mercury absorbent type powder or decontaminant powder (e.g., MerconSORB™, Hg Absorb®, HgX®, or other approved equivalent). Affected spill area will be covered with a tarp after powder is applied to prevent airborne spread of the spill.
5. Advise emergency services personnel of the need to use respirators and provide to them if necessary.
6. Do not open vehicle cargo area door until Emergency Coordinator and/or emergency response team is on site unless you can be reasonably sure that container (lamps, lamp boxes, etc.) breakage is very limited and that opening the vehicle cargo container will not contribute to additional release of mercury contaminated materials.
7. Upon notification of a spill incident by a Company driver or emergency services personnel, the Emergency Coordinator will immediately notify the following agencies of the spill event:
 - Florida DEP Emergency Response Office: 407- ~~897-4339~~
 - State Warning Point: 800-320-0519,
 - National Response Center: 800-424-8802, and
 - Emergency Response Team (Shaw): 407-287-3214.
8. The Emergency Coordinator will depart the scene only after the scene has been appropriately contained and remediated by the emergency response team.

