



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

CENTRAL DISTRICT
3319 MAGUIRE BOULEVARD, SUITE 232
ORLANDO, FLORIDA 32803

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

September 11, 2013

Michael Miliska, Service Coordinator
AERC Com, Inc.
4317 Fortune Place, Suite J
West Melbourne Florida 32904
mmiliska@aerc.com

RE: Warning Letter
AERC Com, Inc.
HW facility ID # FLD984262782
Brevard County
OWL-CAP-13-3200

Dear Mr. Miliska:

A hazardous waste inspection was conducted at your facility on January 24, 2013, under the authority of Section 403.091, Florida Statutes (F.S.). During this inspection, possible violations of Chapter 403, F.S., Chapter 62-737, Florida Administrative Code (F.A.C.), and Title 40 Code of Federal Regulations (CFR) Parts 262 and 264 were observed.

During the inspection Department personnel noted the following:

- Failure to follow permit conditions with drum storage
- Failure to maintain universal waste containers closed
- Failure to complete a manifest correctly with an EPA identification number
- Biennial Report submitted late
- Manifests with missing final destination signatures

Violations of Florida Statutes or administrative rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to Sections 403.121 and 403, Part IV, Florida Statutes.

Please contact Janine Kraemer of the Central District Office at 407-897-4303 or via e-mail at Janine.Kraemer@dep.state.fl.us within **15 days** of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in receiving any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

AERC Com, Inc.; Facility ID No.: FLD984262782
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Warning Letter
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Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), Florida Statutes. We look forward to your cooperation in completing the investigation and resolving this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Prather", is positioned above a horizontal line.

Jeff Prather, District Director
Central District
Florida Department of Environmental Protection

JP/jk

Enclosures: Inspection Report (with attachments)

cc: Maryann Civil, Brevard County Natural Resources Management, maryann.civil@brevardcounty.us



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

FACILITY INFORMATION:

Facility Name: Aerc Com Inc

On-Site Inspection Start Date: 01/24/2013

On-Site Inspection End Date: 01/24/2013

ME ID#: 43329

EPA ID#: FLD984262782

Facility Street Address: 4317 Fortune Pl Ste J, West Melbourne, Florida 32904-1509

Contact Mailing Address: 4317-J Fortune Pl, W Melbourne, Florida 32904-1509

County Name: Brevard

Contact Phone: (321) 952-1516

NOTIFIED AS:

LQG (>1000 kg/month)

Transporter

Transfer Facility

TSD Facility Unit Type(s)

INSPECTION TYPE:

Routine Inspection for TSD Facility Unit Type(s)

INSPECTION PARTICIPANTS:

Principal Inspector: Janine Kraemer, Environmental Manager

Other Participants: Michael Eckoff, Environmental Specialist; Tracy DePaola, Facility Manager

LATITUDE / LONGITUDE: Lat 28° 5' 39.5694" / Long 80° 41' 51.624"

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

TYPE OF OWNERSHIP: Private

Introduction:

On January 24, 2013 Janine Kraemer and Michael Eckoff, Florida Department of Environmental Protection (FDEP), accompanied by Tracy DePaola, AERC Recycling Solutions (AERC) inspected AERC for compliance with state and federal hazardous waste and universal waste regulations. AERC was inspected as a Large Quantity Generator (LQG), transporter, universal waste generator/handler, a hazardous waste transfer facility and a permitted mercury processing facility.

The facility has operated at this location since November 1993 and employs approximately 15-20 people who work Monday through Friday from 7:00AM to 11:00PM. City of West Melbourne provides potable water and sewer. The facility owns three trucks and leases two trucks for transportation of universal waste.

The facility was originally Mercury Technologies International (MTI) but changed its name to Advanced Environmental Recycling Company (AERC) in 2001. The initial RCRA mercury recycling permit was issued December 30, 1996. The current permit, 0072959-HO-004, expires December 30, 2016.

NOTE: The permit incorrectly identifies AERC as the property owner. The property is owned by Fortune Cookie Park Inc.

INSPECTION HISTORY

On April 20, 2011 AERC was inspected by the Department and was not in compliance at the time of the inspection. The facility was cited for failing to keep daily logs, and failure to maintain universal

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waste containers closed. The facility came into compliance immediately and no further action was taken.

On December 16, 2009, AERC was inspected by the Department and found to be in compliance.

On September 11, 2008, AERC was inspected and was not in compliance at the time of the inspection. The facility was cited for: failure to provide adequate aisle space; failure to dispose of waste within 90-days; failure to have accumulation start date on containers per permit. The case was resolved by amending the Long Form Consent Order, OGC #07-2193, from the 2007 inspection. The amendment increased the amount for the Supplemental Environmental Project and a civil penalty of \$7,736.00.

On May 24, 2007, AERC was inspected and was not in compliance at the time of the inspection. The facility was cited for: failure to obtain original manifests; failure to document daily container count log; failure to provide annual training to staff; failure to provide adequate aisle space; failure to update contingency plan; failure to process crushed bulbs within the one year time frame as per permit. The case was resolved by a Long Form Consent order, which included a Supplemental Environmental Project and a civil penalty of \$750.00.

On May 16, 2006, AERC was inspected and found to be in compliance.

On January 10, 2005, AERC was inspected and found to be in compliance.

On September 30, 2004, AERC was inspected and found to be in compliance.

On September 4, 2003, AERC was inspected and was not in compliance at the time of the inspection. The facility was cited for: storage of waste over 90 days; failure to label two corrosive waste drums with accumulation start date; failure to provide adequate aisle space; failure to provide annual training to staff; incomplete contingency plan; failure to date universal waste containers; failure to keep mercury containers closed; and failure to file a manifest discrepancy report within the required time frame. The case was resolved by a Short Form Consent order, which included a Supplemental Environmental Project and a civil penalty of \$4,200.00.

On August 26, 2002, AERC was inspected and was in compliance at the time of the inspection.

On March 15, 2001, Mercury Technologies International changed their name to AERC. AERC was issued a permit on December 3, 2001. Additionally, the facility was inspected and was in compliance at the time of the inspection.

On July 28, 2000, MTI was inspected and was not in compliance at the time of the inspection. The facility was cited for failure to label universal waste containers and failure to have adequate aisle space for containers. The case was resolved by a Short Form Consent Order and a civil penalty of \$1,300.00.

On September 24, 1999, MTI was inspected and was in compliance at the time of the inspection.

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Process Description:

The facility receives spent mercury containing bulbs and devices for the purpose of crushing or dismantling and separating the lamps or devices in a manner as to produce separated individual recyclable components such as glass, scrap metal and mercury containing powder (phosphor powder). A lamp recycler (LSS-1) separates the end caps, glass, shatter shields, and filaments from the phosphor powder. The metal and phosphor powder is sent to a sister company in Pennsylvania for thermal retort. At times when the LSS-1 is not working properly, the glass is put through the machine twice and then sent off to the Brevard County landfill. Samples are taken daily of the glass and end caps. Those samples are then composited and sent for testing.

The facility cannot process lamps or devices containing liquid mercury. Items containing liquid mercury are consolidated and sent to the Pennsylvania facility.

The air filtering unit for the LSS-1 contains three sets of air filters pre-filters, HEPA-filters, and carbon filters. The filters are monitored on a regular basis and when the levels of mercury reach a certain level, the filters are changed. The Pre-Filters have been tested and determined to be nonhazardous. The HEPA-filters and carbon filters are disposed of as hazardous waste.

High Intensity Discharge (HID) lamps are dismantled in order to remove mercury containing ampoules from the bases. The consolidated ampoules are sent to the Pennsylvania facility.

The facility is also a universal waste handler. All types of batteries are brought to the facility then sorted and consolidated into 55-gallon drums or onto pallets. The batteries are shipped off-site for reclamation.

AERC accepts PCB and non-PCB lighting ballasts for sorting and shipment to other recycling facilities, as well as electronic scrap for demanufacturing or remanufacturing. Most electronics are managed at AERC's facility located at 4301 Woodland Park Drive, Suite 105, West Melbourne, Florida.

AERC also operates a 10-day transfer facility for hazardous waste destined for the AERC Pennsylvania TSD facility.

INSPECTION

90-Day Storage Area, Mercury Containing Devices and 10-day Transfer Area:

This area is for containers of mercury containing devices (ie. glassware, elemental mercury, soil, amalgam, etc.) that only have the D009 waste code. These wastes are consolidated and sent to the Pennsylvania facility for final disposal. The date of the oldest container is placed on the drum after the contents are consolidated. At the time of the inspection the facility had two drums in the 90-day storage. Both drums were labeled and dated properly.

The 10-day transfer area contains wastes received with the D009 code plus additional waste codes. These wastes are transferred to the Pennsylvania facility within 10-days of receipt. At the time of the inspection the facility was not storing any 10-day waste.

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At the time of the inspection the facility was storing nine 55-gallon drums of mercury containing devices that were labeled and dated properly. The waste in these drums were from consolidating customer waste. The oldest date is used to date the drums.

Bulb Storage Area:

At the time of the inspection the facility was storing containers of crushed/whole bulbs waiting to be processed in four rows (Figures 1, 4-5). Approximately one-hundred and forty-five 55-gallon drums were stored on pallets three high. This is a violation of the permit as referenced in Permit Application, Item D.8 Quality Control Plan, page 17, which states drums will be stacked one or two high, (less than 9 feet) [F.S. 403.727(1)(c)/62-737.800(9) F.A.C./40 CFR 264.1(b)].

Battery Storage Area:

At the time of the inspection approximately one third of the warehouse was being used for waste batteries managed as universal waste. Batteries are sorted and consolidated by type. Three drums were being used for satellite accumulation of oils, sodium hydroxide, and sulfuric acid. All drums were closed and properly labeled.

Production Area:

LSS-1 was not operating at the time of the inspection. Lamps coated in a plastic shatter shield are sorted and stored separately from regular lamps because of the plastic. At the time of the inspection, there were three open containers waiting for the shatter shield to be removed [62-737.800(9) F.A.C.] (Figure 2). The shatter shield is manually removed from the lamps prior to crushing. At the time of the inspection, the processing area contained a large amount of electronic waste and four 55-gallon drums of crushed lamps. Please be advised that adequate aisle space must be maintained to allow unobstructed access to personnel and fire protection equipment.

HID lamps are sorted, mercury ampoules removed, and stored separately from regular lamps until transported to the Pennsylvania.

Outside next to the loading dock is the area for the roll off containers used to store glass from the mercury lamp processing operation. At the time of the inspection, one of the roll off (Figure 7) containers was not covered [62-737.800(9) F.A.C.].

Supply Storage Area:

This area is identified to be used for supplies, i.e. empty drums, absorbent pads, boxes, etc. and electronic waste. At the time of the inspection, ten 55-gallon drums (Figure 3) of universal waste, dated September 2012 were found stored in this area. This area is not identified in the permit as a universal waste storage area [F.S. 403.727(1)(c)/62-737.800(9) F.A.C./40 CFR 264.1(b)].

Loading Dock:

This area contained several pallets of waste that had been recently delivered to the facility (Figure 6).

According to their Permit Application, Item D.8 Quality Control Plan, page 22, office staff and visitors must wear protective dust resistant booties while inside the plant operating areas. Ms. DePaola was not wearing these booties and inspectors were not offered these booties prior to conducting the inspection.

Two samples were taken of the glass in the roll off container and sent to the Department's Laboratory for TCLP testing for mercury. Both sample results indicated the glass was not a hazardous waste.

Records Review:

Records were reviewed for 2011 and 2012. The records included inspection logs, daily container count logs, contingency plan, position descriptions, training records, land disposal restriction

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notifications, twelve

week rolling average of mercury levels of end caps, glass and HID bases, biennial report, and manifests.

The most recent contingency plan was dated December 21, 2011 and needs to be updated with the new Central District telephone number, 407-897-4100. Training records, position descriptions, land disposal restriction notifications, inspections, and the twelve week rolling average of mercury levels of end caps and glass were in compliance. The Biennial Report due March 1, 2012 was not submitted until July 12, 2012 [40 CFR 264.75]. AERC completed the annual universal waste registration on time.

Manifests 001898412FLE, 001898413FLE and 001898414FLE were transported by AERC from Southern Carolina, company located in South Carolina. According to Ms. DePaola, AERC was hired to clean Southern Carolina, a defunct mercury processing facility. The manifests indicated Small Quantity Generator (SQG) amounts of wastes; however, the manifests did not contain an EPA identification number. In the block on the manifest for the EPA identification, "SCCESQG" was written [40 CFR 262.20]. The person that signed the manifest as the generator was AERC employee, Michael Miliska. Additionally, manifest 00189813FLE was signed by Mr. Miliska as the generator and transporter. Manifest 00189814FLE was missing the designated facility signature [40 CFR 264.71].

The facility is using Cintas to launder shop towels. The facility is sending all of the mercury containing material, including batteries, to their Allentown, Pennsylvania facility for further processing.

Batteries are shipped to Toxoc in Ohio. Forklift batteries are shipped back to the supplier for repair.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	264.71(a)(1)
Explanation:	If a facility receives hazardous waste accompanied by a manifest, the owner, operator or his/her agent must sign and date the manifest as indicated in paragraph (a)(2) of this section to certify that the hazardous waste covered by the manifest was received, that the hazardous waste was received except as noted in the discrepancy space of the manifest, or that the hazardous waste was rejected as noted in the manifest discrepancy space. Specifically, AERC, as the designated facility did not sign manifest 001898414FLE.
Corrective Action:	Within 30 days of receipt of this letter, AERC shall submit a signed copy of the manifest.

Type:	Violation
Rule:	264.75
Explanation:	Biennial report. The owner or operator must prepare and submit a single copy of a biennial report to the Regional Administrator by March 1 of each even numbered year. The biennial report must be submitted on EPA form 8700-13B. Specifically, AERC did not submit the biennial report until July.
Corrective Action:	This corrective action was completed when the Department received the report on July 16, 2012.

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Type: Violation
Rule: 403.727(1)(c)
Explanation: 62-737.800(9) and 264.1- Failure to comply with permit condition Part I-General and Standard Conditions. Specifically, AERC stated in their permit application that they would limit storage of drums 1 or 2 high (no higher than 9 feet). Additionally, AERC stored universal waste in an area that was reserved for supplies.
Corrective Action: Within 30 days of receipt of this letter, AERC needs to organize the bulb storage area so that drums are not stored three pallets high and discontinue storage in the supply storage area.

Type: Violation
Rule: 62-737.800(9)
Explanation: Owners and operators shall store processed and unprocessed materials in closed containers; and for broken or damaged unprocessed lamps and devices, and residuals, store these in closed, covered and sealed containers or in enclosed areas of the facility conforming to paragraph 62-296.417(1), F.A.C., to prevent mercury emissions. Specifically, AERC was storing bulbs in open containers and had not completely covered the roll off dumpster of glass.
Corrective Action: Within 30 days of receipt of this letter, AERC shall provide written documentation that all bulb and glass containers are closed and that employees have been trained to maintain containers closed.

Type: Violation
Rule: 262.20(a)(1)
Explanation: A generator who transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal, or a treatment, storage, and disposal facility who offers for transport a rejected hazardous waste load, must prepare a Manifest (OMB Control number 2050-0039) on EPA Form 8700-22. Specifically, as a co-generator, AERC prepared three hazardous waste manifests for Southern Carolina that did not contain an EPA identification number.
Corrective Action: AERC must not transport SQG amounts of waste without ensuring hazardous waste manifests contain an EPA identification number.

Conclusion:

AERC was inspected as a permitted storage/mercury recovery facility, LQG of hazardous waste, and an LQH of universal waste. A discussion was held with Ms. DePaola at the end of the inspection outlining the items needing corrective action. The facility was not in compliance with their permit at the end of this inspection and copy of the permit could not be located at the facility at the time of the inspection.

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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.

Janine Kraemer

PRINCIPAL INSPECTOR NAME

Environmental Manager

PRINCIPAL INSPECTOR TITLE

FDEP

ORGANIZATION**Supervisor:** Gary Miller

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.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number FLD980729610	2. Page 1 of 3	3. Emergency Response Phone (800) 483-3718	4. Manifest Tracking Number 004897717 FLE	
5. Generator's Name and Mailing Address Clean Harbors Florida LLC 170 Bartow Municipal Airport Bartow, FL 33830 Generator's Phone: (863) 533-6111			Generator's Site Address (if different than mailing address) SAME			
6. Transporter 1 Company Name Aerc.com Incorporated			U.S. EPA ID Number FLD984262782			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address Aerc.com Incorporated 4317-L Fortune Place Melbourne, FL 32904 Facility's Phone:			U.S. EPA ID Number FLD984262782			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3028. WASTE BATTERIES, DRY, CONTAINING POTASSIUM HYDROXIDE SOLID, ELECTRIC, STORAGE, 8, PG III	001	DF	00005	P	D006
X	2. RQ, UN2800, WASTE BATTERIES, WET, NON-SPILLABLE, ELECTRIC STORAGE, 8, PG III (D008)	001	DF	00080	P	D002 D008
X	3. RQ, UN2794, WASTE BATTERIES, WET, FILLED WITH ACID, 8, PG III (D008)	002	DF	00764	P	D002 D008
X	4. NA3077. HAZARDOUS WASTE, SOLID, N.O.S., (MERCURY), 9, PG III	001	DF	00009	P	D009
14. Special Handling Instructions and Additional Information 1. 101227-27ND ERG#154 1X5 2. 101227-27 ERG#154 1X16 3. 101227-27 ERG#154 2X55 4. 101227-11-COMPA ERG#171 1X5						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name Paul Leiser		Signature <i>Paul Leiser</i>		Month Day Year 03/01/12		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name Jack Briggs		Signature <i>Jack Briggs</i>		Month Day Year 03/01/12		
Transporter 2 Printed/Typed Name		Signature		Month Day Year		
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number: _____						
18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone: _____						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. H141 2. H141 3. H141 4. H010						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name HECTOR RODRIGUEZ		Signature <i>Hector Rodriguez</i>		Month Day Year 03/01/12		

HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number FLD980729610	22. Page 2 of 3	23. Manifest Tracking Number 004897717FLE	
24. Generator's Name Clean Harbors Florida LLC					
25. Transporter Company Name				U.S. EPA ID Number	
26. Transporter Company Name				U.S. EPA ID Number	
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No. Type		29. Total Quantity	30. Unit Wt./Vol.
X	5. NA3077, HAZARDOUS WASTE, SOLID, N.O.S., (MERCURY), 9, PG III	001	DF	00007	P
X	6. NA3077, HAZARDOUS WASTE, SOLID, N.O.S., (MERCURY), 9, PG III	001	CF	00002	P
X	7. UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., (UNIVERSAL WASTE MERCURY LAMPS), 9, PG III	001	DF	00009	P
X	8. UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., (UNIVERSAL WASTE MERCURY LAMPS), 9, PG III	001	DF	00100	P
X	9. UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., (UNIVERSAL WASTE MERCURY LAMPS), 9, PG III	001	DF	00150	P
X	10. UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., (UNIVERSAL WASTE MERCURY LAMPS), 9, PG III	001	CF	00008	P
X	11. UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., (UNIVERSAL WASTE MERCURY LAMPS), 9, PG III	001	CF	00001	P
	12. NON DOT REGULATED MATERIAL. (UNIVERSAL WASTE CRUSHED MERCURY LAMPS)	001	DM	00048	P
	13. UNIVERSAL WASTE, (MERCURY LAMPS)	006	DF	00504	P
	14. BATTERIES, DRY, SEALED, N.O.S., (ALKALINE BATTERIES)	010	DF	00757	P
32. Special Handling Instructions and Additional Information					
5. 101227-19 ERG#171 LX5 9. 101227-09-HID ERG#171 LX55 13. 101227-09-COMPA 6X3					
6. 101227-19 ERG#171 LXBOX 10. 101227-09-ARC ERG#171 LXBOX 14. 101227-26D 8X5					
7. 101227-09-COMPA ERG#171 LX5 11. 101227-09-COMPA ERG#171 LXBOX					
8. 101227-09-HID ERG#171 LX30 12. 101227-10 LX55					
33. Transporter Acknowledgment of Receipt of Materials					
Printed/Typed Name		Signature		Month	Day Year
34. Transporter Acknowledgment of Receipt of Materials					
Printed/Typed Name		Signature		Month	Day Year
35. Discrepancy					
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
5.	H010	6.	H010	7.	H010
10.	H010	11.	H010	12.	H010
13.	H010	14.	H111		

HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator ID Number

FLD980729610

22. Page

3 of 3

23. Manifest Tracking Number

004897717FLE

Generator's Name

Clean Harbors Florida LLC

25. Transporter _____ Company Name

U.S. EPA ID Number

26. Transporter _____ Company Name

U.S. EPA ID Number

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes		
		No.	Type					
	15. UNIVERSAL WASTE, (UNIVERSAL WASTE MERCURY LAMPS)	001	DF	00073	P			
	16. NON D.O.T. REGULATED, (UNIVERSAL WASTE MERCURY LAMPS)	001	DF	00046	P			
	17. UNIVERSAL WASTE, (MERCURY LAMPS)	001	DM	00200	P			
	18. UNIVERSAL WASTE, (MERCURY LAMPS)	001	CF	00001	P			
	19. UNIVERSAL WASTE, (MERCURY LAMPS)	003	CF	00040	P			
	20. NON D.O.T. REGULATED, (UNIVERSAL WASTE MERCURY LAMPS)	136	CF	00906	P			

32. Special Handling Instructions and Additional Information

15. 101227-09-COMPA 1X55 19. 101227-09-COMPA 3XBOX
 16. 101227-09-HID 1X55 20. 101227-09-HID 136XBOX
 17. 101227-09-COMPA 1X55
 18. 101227-09-ARC 1XBOX

33. Transporter _____ Acknowledgment of Receipt of Materials

Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____

34. Transporter _____ Acknowledgment of Receipt of Materials

Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

15. H010 16. H010 17. H010 18. H010 19. H010
 20. H010

GENERATOR

TRANSPORTER

DESIGNATED FACILITY

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number SCCES909	2. Page 1 of 1	3. Emergency Response Phone 800-535-5053	4. Manifest Tracking Number 001898414 FLE			
5. Generator's Name and Mailing Address SOUTHERN CAROLINA 1321 TECHNOLOGY DRIVE BARNWELL, SC 29812		Generator's Site Address (if different than mailing address)						
Generator's Phone: 804-541-0023								
6. Transporter 1 Company Name AERC.COM INC				U.S. EPA ID Number FLD954262782				
7. Transporter 2 Company Name				U.S. EPA ID Number				
8. Designated Facility Name and Site Address AERC.COM INC 4317 FORTUNE PLACE SUITE J W MELBOURNE, FL 32904				U.S. EPA ID Number FLD954262782				
Facility's Phone: 321-982-1518								
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes		
		No.	Type					
1.	HA3077, HAZARDOUS WASTE SOLID, N.O.S. 9, PG III (MERCURY) (ERG#171)	2	GW	EST 1400	P	0009		
2.	HA3077, HAZARDOUS WASTE SOLID, N.O.S. 9, PG III (MERCURY) (ERG#171)	1	DM	EST 4500	P	0009		
3.	HA3077, HAZARDOUS WASTE SOLID, N.O.S. 9, PG III (MERCURY) (ERG#171)	2	DM	EST 1400	P	0009		
4.								
14. Special Handling Instructions and Additional Information In case of Hazardous Material Transportation Emergency: Only Contact INFOTRAC @ 1-800-535-5053 and identify AERC as Registrant. LINE 1, 2) MODULE 1-1 (DEBR) LINE 3) MODULE 1-1 (PHOSPHOR POWDER)								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offor's Printed/Typed Name Munir Alshak				Signature Munir Alshak		Month Day Year 3 2 12		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name T. T.				Signature T. T.		Month Day Year 3 2 12		
Transporter 2 Printed/Typed Name				Signature		Month Day Year		
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
Manifest Reference Number: _____								
18b. Alternate Facility (or Generator)				U.S. EPA ID Number				
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator)				Month Day Year				
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a								
Printed/Typed Name				Signature		Month Day Year		

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number SCCESQG	2. Page 1 of 1	3. Emergency Response Phone 800-535-5053	4. Manifest Tracking Number 001898412 FLE		
5. Generator's Name and Mailing Address SOUTHERN CAROLINA 1321 TECHNOLOGY DRIVE BARNWELL, SC 29812				Generator's Site Address (if different than mailing address)			
Generator's Phone: 804-541-0023							
6. Transporter 1 Company Name AERC.COM INC.				U.S. EPA ID Number FLD984262782			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address AERC.COM INC. 4317 FORTUNE PLACE SUITE J W. MELBOURNE, FL 32904				U.S. EPA ID Number FLD984262782			
Facility's Phone: 321-952-1516							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes
	X	1. NA3077, HAZARDOUS WASTE SOLID, N.O.S., 9, PG III (MERCURY) (ERG#171) DID NOT SHIP	— GW		—	—	8889
	X	2. NA3077, HAZARDOUS WASTE SOLID, N.O.S., 9, PG III (MERCURY) (ERG#171) Crushed Glass	2 DM		EST 1000	P	D009
	X	3. NA3077, HAZARDOUS WASTE SOLID, N.O.S., 9, PG III (MERCURY DEBR) (ERG#171)	13 DM		EST 7800	P	D009
		4. Non-DOT Regulated Batteries (mixed) For Recycling Universal Waste	1 DF		EST 30	P	None
14. Special Handling Instructions and Additional Information In case of Hazardous Materials Transportation Emergency- Only Contact INFOTRAC @ 1-800-535-5053 and Identify AERC as Registrant. LINE 1, 2) MODULE 1-1 (DEBR) LINE 3) MODULE 1-1 (PHOSPHOR POWDER GLASS)							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name Michael Maliska				Signature Michael Maliska FOR SOUTHERN CAROLINA		Month Day Year 3 3 12	
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name JASON TURNER Signature _____ Month Day Year 3 3 12 Transporter 2 Printed/Typed Name _____ Signature _____ Month Day Year _____						
DESIGNATED FACILITY	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____						
	18b. Alternate Facility (or Generator)				U.S. EPA ID Number		
	Facility's Phone: _____						
	18c. Signature of Alternate Facility (or Generator)				Month Day Year		
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. — 2. H010 3. H141 4. H141						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Printed/Typed Name Travis DeLong Signature _____ Month Day Year 03 05 12							

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number EGGEGG	2. Page 1 of 1	3. Emergency Response Phone 800-535-5053	4. Manifest Tracking Number 001898413 FLE
5. Generator's Name and Mailing Address SOUTHERN CAROLINA 1321 TECHNOLOGY DRIVE BARNWELL, SC 29612 Generator's Phone: 804-541-0023					
6. Transporter 1 Company Name AERC.COM INC.				U.S. EPA ID Number FLD984262782	
7. Transporter 2 Company Name				U.S. EPA ID Number	
8. Designated Facility Name and Site Address AERC.COM INC. 4317 FORTUNE PLACE SUITE J W. MELBOURNE, FL 32904 Facility's Phone: 321-952-1516				U.S. EPA ID Number FLD984262782	
GENERATOR	9a. HM		9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers
					No. Type
	X	1. NA3077, HAZARDOUS WASTE SOLID, N.O.S., 9, PG III (MERCURY) (ERG#171)		2	CW
	X	2. NA3077, HAZARDOUS WASTE SOLID, N.O.S., 9, PG III (MERCURY) (ERG#171)		5	DM
	X	3. NA3077, HAZARDOUS WASTE SOLID, N.O.S., 9, PG III (MERCURY) (ERG#171) DID NOT SHIP		DM	0009
11. Total Quantity EST 1200					
12. Unit Wt./Vol. EST 600 P					
13. Waste Codes 0009					
14. Special Handling Instructions and Additional Information In case of Hazardous Materials Transportation Emergency- Only Contact INFOTRAC @ 1-800-535-5053 and Identify AERC as Registrant. LINE 1, 2) MODULE 1-1 (DEBR) LINE 3) MODULE 1-1 (PHOSPHOR POWDER)					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Officer's Printed/Typed Name Michael Maliska				Signature Michael Maliska <i>Southern Carolina</i>	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.				Port of entry/exit: Date leaving U.S.:	
17. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name Michael Maliska				Signature Michael Maliska	
Transporter 2 Printed/Typed Name				Signature	
18. Discrepancy					
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
Manifest Reference Number:					
18b. Alternate Facility (or Generator) U.S. EPA ID Number					
Facility's Phone:					
18c. Signature of Alternate Facility (or Generator)					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
1. H141		2. H141		3.	
20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a					
Printed/Typed Name Tracy Delaw				Signature [Signature]	
				Month Day Year 3 3 12	

263.20(a)

NON-HAZARDOUS WASTE MANIFEST		1. Generator ID Number SCCESQG	2. Page 1 of 1	3. Emergency Response Phone 800-535-5053	4. Waste Tracking Number 185284	
5. Generator's Name and Mailing Address SOUTHERN CAROLINA 1321 TECHNOLOGY DRIVE BARNWELL, SC 29812			Generator's Site Address (if different than mailing address)			
Generator's Phone: 804-541-0023						
6. Transporter 1 Company Name AERC.COM INC.			U.S. EPA ID Number FLD984262762			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address AERC.COM INC. 4317 FORTUNE PLACE SUITE J W. MELBOURNE, FL 32904			U.S. EPA ID Number FLD984262762			
Facility's Phone: 321-952-1516						
9. Waste Shipping Name and Description		10. Containers		11. Total Quantity	12. Unit Wt./Vol.	
		No	Type			
GENERATOR ↓ INT'L ↓ TRANSPORTER ↓ DESIGNATED FACILITY	X 1. RQ, UN2315, Polychlorinated Biphenyls, Liquids, 9, PGII (ERG #171)	7	DM	EST 3500	P	NONE
	2. Non - PCB Ballast for recycling, Dot Non-Regulated	6	DM	EST 3000	P	NONE
	3. UNIVERSAL WASTE MERCURY CONTAINING LAMPS FOR RECYCLING DOT NON-REGULATED	13	DF	EST 800	P	NONE
	4. UNIVERSAL WASTE MERCURY CONTAINING LAMPS FOR RECYCLING DOT NON-REGULATED	10	CW	EST 3500	P	NONE
13. Special Handling Instructions and Additional Information In Case of Hazardous Materials Transportation Emergency - Only- Contact INFOTRAC @ 1-800-535-5053 and Identify AERC as Registrant Line 1) Module 1-15 LINE 2) MMODULE 1-16 LINE 3,4) MODULE 1-1						
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.						
Generator's/Offor's Printed/Typed Name Michael Maliska		Signature <i>Michael Maliska For Southern Carolina</i>		Month Day Year 3 3 12		
15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:				
Transporter Signature (for exports only):						
16. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name JASON TURNER		Signature <i>[Signature]</i>		Month Day Year 3 3 12		
Transporter 2 Printed/Typed Name		Signature		Month Day Year		
17. Discrepancy						
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number:						
17b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone:						
17c. Signature of Alternate Facility (or Generator) Month Day Year						
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in item 17c						
Printed/Typed Name <i>Tracy DePaul</i>		Signature <i>[Signature]</i>		Month Day Year 3 05 12		



Figure 1: Fluorescent bulbs in boxes



Figure 2: Mercury processing area



Figure 3: Universal waste in supply storage area



Figures 4 and 5: Universal waste stacked 3 pallets high



Figure 6: Loading dock



Figure 7: Waste glass dumpster