

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 <u>Janine.Kraemer@dep.state.fl.us</u> 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

OCD-CAP-13-3200 Warning Letter Page 2 of 2 September 11, 2013

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,

Jeff Prather, District Director

& Cath

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 PI Ste J, West Melbourne, Florida 32904-1509

Contact Mailing Address: 4317-J Fortune PI, 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

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.

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 transfered to the Pennsylvania facility within 10-days of receipt. At the time of the inspection the facility was not storing any 10-day waste.

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

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.

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.

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.

	Environmental Manager					
PRINCIPAL INSPECTOR NAME	PRINCIPAL INSPECTOR TITLE					
	FDEP					
	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.

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Form Approved. OMB No. 2050-0039

22. Page 23. Manifest Tracking Number HAZARDOUS WASTE MANIFEST 21. Generator ID Number (Continuation Sheet) FLD980729610 2 of 3 004897717FLE 24. Generator's Name Clean Harbors Florida LLC U.S. EPA ID Number Company Name 25 Transporter U.S. EPA ID Number Company Name 26. Transporter 27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 28. Containers 29. Total 30. Unit 27a 31. Waste Codes and Packing Group (if any)) Wt A/ol HM Quantity No. Type 5. NA3077. HAZARDOUS WASTE, SOLID. N.O.S., (MERCURY), 9. D009 Х 001 DF 00007 P 6. NA3077, HAZARDOUS WASTE, SOLID, N.O.S., (MERCURY), 9, D009 X P 001 ČΕ 00002 PG III 7. UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, X SOLID, N.O.S. (UNIVERSAL WASTE MERCURY LAMPS), 9, PG III. 001 P DF 00009 8. UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES. X SOLID. N.O.S., (UNIVERASAL WASTE MERCURY LAMPS), 9, PG 001 00100 Р DF III 9. UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES. X SOLID, N.O.S., (UNIVERSAL WASTE MERCURY LAMPS), 9, PG III 001 DF 00150 Р 10. UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES. X SOLID, N.O.S., (UNIVERSAL WASTE MERCURY LAMPS), 9, PG III 001 CF 80000 P 11. UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, X SOLID, N.O.S., (UNIVERSAL WASTE MERCURY LAMPS), 9, PG III 001 P CF 00001 12. NON DOT REGULATED MATERIAL (UNIVERSAL WASTE CRUSHED MERCURY LAMPS) 001 P DM 00048 13. UNIVERSAL WASTE, (MERCURY LAMPS) 006 DF 00504 P 14. BATTERIES, DRY, SEALED, N.O.S., (ALKALINE BATTERIES) 010 DE 00757 P 32. Special Handling Instructions and Additional Information
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SC PPW 3/3/2011

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

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1	N	VASTE MANIFEST	Generator ID Number SCCESQG		2. Page 1 of 3	Emergency Respon 800-535-5053	se Phone	4. Manifest	Tracking N	8412		LE		
		5. Generator's Name and Malling Address SOUTHERN CAROLINA 1321 TECHNOLOGY DRIVE BARNWELL, SC 29812 Generator's Phone: 804-541-0023												
	6. Tr	ransporter 1-Company Name	U.S. EPA ID Number											
18		AERC. COM INC. ansporter 2 Company Name	9		FLD984262782 U.S. EPA ID Number									
	Q Da	estanded English Name and	i Cita Addensa											
	10	AERC COM NC. 4317 FORTUNE PL W. MELBOURNE, F	U.S. EPA ID N	lumber 984262 7	782									
	Facili	ity's Phone: 321-952-1												
	9a. HM	and Packing Group (if ar	n (including Proper Shipping Nar ny))	me, Hazard Class, ID Number,		10. Conta	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Wa	este Codes			
ATOR -	Х	(ERG#171)	RDOUS WASTE SOL	D, N.O.S., 9,PG III (MERCURY)		- cw -	-		-D009 -				
- GENERATOR	Х	2. NA3077, HAZA (ERG#171)	T SUN PROUS WASTE SOLI (USLED) GV	D, N.O.S., 9,PG III (N	MERCURY)	2	DM	EST	P	D009				
	Х	3. NA3077, HAZA	RDOUS WASTE SOL			13	DM	E21	P	D009				
		DEBRI)(ERG#I	•			15		780D	. 1					
		MON- DOS	cling Univer	Batteries Cm SAI Waste	ixed)	t	DF	EST 20	P	None				
	15.	GENERATOR'S/OFFEROR marked and labeled/placard Exporter, I certify that the co	us Materials Transporta E 1-1 (DESRI) LINE 3) R'S CERTIFICATION: I hereby deed, and are in all respects in propintents of this consignment confonization statement identified in 41 and 51 are the statement identified in 41 are the st	declare that the contents of this oper condition for transport account to the terms of the attached	consignment are fording to applicable I EPA Acknowledge e quantity generate	ully and accurately de international and na- ment of Consent. or) or (b) (if I am a sm	escribed above l tional governme all quantity gene	by the proper ship ental regulations. erator) is true.	pping name If export sh	, and are classif	ied, packag			
<u> </u>	Λ	Michael M	Alista		M	chael Ma	liska r	for Car	rojiri Villet	<u> 3</u>	3	12		
INT	. / /	sporter signature (for export	Import to U.S		Export from U.S.	Port of er Date leav	ntry/exit:					-		
	17. Tr	ransporter Acknowledgment	of Receipt of Materials		Signatu					Month	Day	Year		
SPOR	7	FASON TURN			1 //					3	13	12		
TR ANSPORTER		sporter 2 Printed/Typed Nam	e		Signatu	re				Month	Day	Year		
1		iscrepancy Discrepancy Indication Space	e Quantity	Туре		Residue		Partial Reje	ection		Full Rejec	tion		
 >-	185 /	Alternate Facility (or Genera	tor)			Manifest Reference	e Number.	U.S. EPA ID N	umber					
ACILIT	100,7	Alternate Labelly (of Genera	ω,					0.0. 21311011						
ATED F.		ty's Phone: Signature of Alternate Facilit					Month	Day	Year					
DESIGNATED FACILITY	19. H	azardous Waste Report Mai	nagement Method Codes (i.e., co	odes for hazardous waste treatr	ment, disposal, and	recycling systems)		4 1	1 11 1					
	20. De	esignated Facility Owner or	Operator; Certification of receipt	of hazardous materials covered	d by the manifest	execut as door in the	m 18a N		414					
	Printe	THE THE TALL	Malgr	200	Jan Columbia					Month	20	- Year		
EPA	Form	1 8700-22 (Rev. 3-05) R	revious editions are obsolete	9.	`	DESI	GNATED FA	CILITY TO D	ESTINA	TION STATE	(IF REC	UIRED		

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1		FORM HAZARDOUS	Generator ID Nur	nber		2 Page 1 o	f 3. Emergen	cy Respons	e Phone	4. Manifest			2				
	5. G	enerator's Name and Mailing	Address SGGES)G			Generalor S	Sie Address	Tif different th	nan mailing addres	TOS	0041	<u>. ၁</u>	FLE			
	Gen	SOUTHERN CAROL 1321 TECHNOLOGY BARNWELL, SC 2	LINA Y DRI VE 9812				1	5.00									
	6. 11	5. Transporter 1. Company Ref (541 0023									U.S. EPA ID Number						
	AERC. COM INC. 7 Transporter 2 Company Name 8. Designated Facility Name and Site Address AERC. COM INC. 4317 FORTUNE PLACE SUITE J W. MELBOURNE, FL 32904									U.S. EPÁ ID N	9842527 lumber	782					
											U.S. EPA ID Number FLD984262762						
	9a. HM	9b. U.S. DOT Descriptio and Packing Group (if ar	516 n (including Proper S ny))	hipping Name, H	azaro Class, ID Nur	mber.		10. Contai	nens	11. Tatai Quantity	12 Unit	13.	13. Waste Codes				
GENERATOR	х	1. NA3077, HAZA (ERG#171)	RDOUS WAS	TE SOLID, N	N.O.S., 9,PG	III (MERCUR)	Y)	2	cw	1200		.0009					
- GENE	Х	2. NA3077, HAZA (ERG#171)	RDOUS WAS	TE SOLID, N	N.O.S., 9,PG	III(MERCUR)	()	5	DM	600	P	.0009					
	x	3 N ASO77 , HAZA DEBRIMERGIA	RDOUS WAS	DID N	og PG	II (MERCUR	Y		-DM	-		1009-1					
		4.	_														
	14 5	Special Handling Instructions	and Additional Infor	mation										1			
		In case of Hazardoi LINE 1, 2) MODULE GENERATOR'S/OFFEROP	us Materials T E 1-1 (DEBRI)	ransportation	DULE 1-1 (P)	dOSPHOR PC	are fully and as	ocurately de	scribed above	by the proper shi	pping nam	e, and are dia	ssified, pag	okaged,			
		marked and labeled/placard Exporter, I certify that the co I certify that the waste minion	ontents of this consig nization statement in	nment conform to	the terms of the at	ttached EPA Acknow	viedgment of Co	onsent.						4			
	Gene	erator's/Offeror's Printed/Typ	edName			Si	gnatue	10.0	MAL	LIBER	South	dien Mo	_	y Year			
<u>*</u>	16. lr	nternational Shipments	USTO				TIMEN	War.		MICH	3 12	-	<i>)</i> 0	, AC.			
INT	Tran	sporter signature (for export	lmport to s only):	U.S.		Export from	0.5.	Port of en Date leavi									
ER		ransporter Adknowledgment		s		_	N			^							
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		Discrepancy Indication Space	e Quanti	у	Тур	e		usidue si Reference	a N. uminor	Partial Reje	ection		Full fx	ejection			
DESIGNATED FACILITY		Alternate Facility (or Genera	itor)	_			manies	3. 10.0101100		U.S. EPA ID N	unber						
NATED F		ily's Phone: Signature of Alternate Facilit	y (or Generator)									Mo	onth D	ay Year			
SIG	_	lazarda:is Waste Report Ma	nagement Method C		for hazardous wast:	e treatment, disposa	al, and racydling	sydiams)									
G -	1.	H141		2.	141	3.	- C	1		4.							
	20.ID	Designated Facility Owner of edit speed hame	Operator, Certificati	of receipt of ha	azardous materials	covered by the ma	Yeat excuptos	ootea in ite	NI)			\mathbb{R}^{N}				
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1	400000000000000000000000000000000000000	HAZARDOUS E MANIFEST	Generator ID Number SCCESQG		2. Page 1 of 1	3. Emergency Respon	ise Phone	4. Waste T	racking No.				
	1321 BAR	or's Name and Maili THERN CARO TECHNOLOG NWELL, SC 2	ILÎNA Y DRIVE 19812		1	Generator's Site Addre	ess (if different	than mailing addre	ess)	•			
	Generator's Phone: 804-541-0023 6. Transporter 1 Company Name U.S. EPA ID Number AERC. COM INC.												
	17,000,000	rter 2 Company Nar		U.S. EPA ID	3642627 Number	82							
	4317 W. N	led Facility Name ar C.COM INC. FORTUNE PL MELBOURNE, hone: 321-952-	U.S. EPA ID Number FLD984262762										
		Vaste Shipping Nam	- 988			10. Cor	1	11. Total Quantity	12. Unit Wt./Vol.				
GENERATOR —	X 1.	RQ, UN2315,F	Polychlorinated Biphenyls,	Uquids, 9, PGII	(ERG #171)	No 7	DM Type	E57 35∞		NONE			
- GENE	2 Non – PCB Ballast for recycling, Dot Non-Regulated 6 DM								P	NONE			
		UNIVERSAL WASTE MERCURY CONTAINING LAMPS FOR RECYCLING DOT NON-REGULATED UNIVERSAL WASTE MERCURY CONTAINING LAMPS FOR RECYCLING DOT NON-REGULATED 13 DF 800 P								NONE	NONE		
			WASTE MERCURY CON DOT NON-REGULATED	TAINING LAMPS F	OR	10	cw	Est 3500	P	NONE			
	marked	and labeled/placard	R'S CERTIFICATION: I hereby decia ded, and are in all respects in proper		cording to applica	ible international and na	ational governn	nental regulations.					
¥		s/Offeror's Printed/T			Sign	What Mo	ista Fo	Soud Carea	lina	Month 3	Day	Year 12	
INT		tional Shipments r Signature (for expo	Import to U.S.		Export from U	.S. Port of	entry/exit: aving U.S.:					_	
	16. Transpo		ent of Receipt of Materials		Sign	nature				Month	Day	Year	
SPOR	JAS	ON TURK	UER							3	3	12	
TRANSPORTER	Transporte	r 2 Printed/Typed Na	ame		Sign	nature				Month	Day 	Year	
A	17. Discrep	pancy epancy Indication Sp	200										
	17a. Oiscie	sparicy moleanon op	Quantity	Туре		Residue		Partial Rej	ection		Full Rejec	tion	
- YTITIC	17b. Alterna	ate Facility (or Gene	erator)			Manifest Reference	Number:	U.S. EPA ID I	Number				
DESIGNATED FACILITY	Facility's Pt 17c. Signat	hone: ture of Alternate Fac	cility (or Generator)							Month	Day	Year	
- DESIGI			1211			A.							
*	18. Designa	ated Facility Owner	or Operator: Certification of receipt o	f materials covered by the	manife except	as noted m 7	M			Mogh Mogh	05	12	

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DESIGNATED FACILITY TO GENERATOR



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