



LIGHTING RESOURCES, LLC

1007 SW 16th Lane
Ocala, FL 34471
(352) 509-3001 • Fax (352) 509-3012
(855) 502-3001



FedEx Standard Overnight 10.17.13
Direct Signature Required

Larry Lamberth, Chief
South Enforcement and Compliance Section
RCRA and OPA Enforcement and
Compliance Branch
USEPA Region 4
61 Forsyth Street
Atlanta, GA 30303

Received
OCT 21 2013

BSHW

SUBJECT: RCRA Compliance Evaluation Inspection
Lighting Resources, LLC
EPA ID No.: FLR 000 070 565

Dear Mr. Lamberth,

Enclosed is the response to the EPA RCRA Site Inspection Report conducted on April 25, 2013. Lighting Resources believes this response answers all concerns in regard to the deficiencies of RCRA regulations listed in the inspection report.

If you have any questions regarding this matter, please contact Susan Richard, Lighting Resources Compliance Officer, 909-923-2957, susan.richard@lightingresourcesinc.com, or myself, 352-509-3001, bonnie.bishop-clark@lightingresourcesinc.com.

Sincerely,

Bonnie Bishop-Clark
Southeast Branch Manager
Lighting Resources LLC
1007 SW 16th Lane
Ocala, Florida 34474

Cc:

Susan Richard, Lighting Resources LLC
Hector M. Danois, USEPA Region 4
Janine Kramer, FDEP Central District
Tim Bahr, FDEP Tallahassee

RECEIVED
RCRA

OCT 21 2013

Hazardous Waste Regulation



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 20 2013

CERTIFIED
MAIL

RETURN RECEIPT REQUESTED

Bonnie Bishop-Clark
Southeast Branch Manager
Lighting Resources, LLC
1007 SW 16th Lane
Ocala, Florida 34474

SUBJ: RCRA Compliance Evaluation Inspection
Lighting Resources, LLC
EPA ID. No.: FLR 000 070 565


Dear Mrs. Bishop-Clark:

On April 25, 2013, a Compliance Evaluation Inspection (CEI) was conducted by the U.S. Environmental Protection Agency and the Florida Department of Environmental Protection (FDEP) at the Lighting Resources, LLC facility in Ocala, Florida to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA). This RCRA CEI was an EPA-lead inspection.

Enclosed is the EPA RCRA Site Inspection Report which indicates that deficiencies of RCRA regulations were discovered. A copy of this report has also been forwarded to FDEP.

If you have any questions regarding this matter, please contact Hector M. Danois, of my staff, by telephone at (404) 562-8556 or by email at danois.hector@epa.gov.

Sincerely,


Hector M. Danois, Chief
South Enforcement and Compliance Section
RCRA and OPA Enforcement
and Compliance Branch

Enclosure

cc: Janine Kramer, FDEP Central District
Tim Bahr, FDEP Tallahassee

RCRA Inspection Report

1) Inspector and Author of Report

Hector M. Danois
Environmental Engineer
RCRA Enforcement and Compliance Branch
EPA Region 4, AFC - 10th Floor
61 Forsyth Street
Atlanta, Georgia 30303
(404) 562 - 8556

2) Facility Information

Lighting Resources, LLC
1007 SW 16th Lane
Ocala, Florida 34474
EPA ID. No.: FLR 000 070 565

3) Responsible Official

Bonnie Bishop-Clark, Southeast Branch Manager
Lighting Resources, LLC

4) Inspection Participants

Anthony McDonald	Lighting Resources, LLC
Terry Sutton	Lighting Resources, LLC
Janine Kramer	FDEP
Hector M. Danois	U.S. EPA Region 4

5) Date of Inspection

April 24, 202013

6) Applicable Regulations

RCRA Sections 3005 and 3007
40 Code of Federal Regulations (C.F.R.) Parts 260 - 266, 268, 270 and 273
Chapters 403 & 378, F.S., and Chapters 62-710, 62-730, and 62-737 Florida Administrative
Code (F.A.C.)

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced U.S. Environmental Protection Agency Compliance Evaluation Inspection (CEI) and determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

8) Facility Description

Lighting Resources (LR) operates a mercury recovery facility to process mercury containing lamps. LR obtained a RCRA Permit (0309339-H0-001) issued on July 6, 2012, and that expires July 6, 2017. LR notified FDEP as a transporter and large quantity handler of universal waste lamps and devices. The facility began operations at this location on July 11, 2012.

The facility operates five days a week with two shifts with a 4-hour overlap between the two shifts with 19 employees. LR is connected to City of Ocala drinking water and sanitary sewer services.

9) History of Compliance

On August 2012, FDEP conducted an inspection at the facility. The facility failed to meet permit conditions by not maintaining the log documenting of the 12 week rolling average, not having the proper signage and not documenting weekly inspections. Additionally, LR was advised to ensure employees had the proper training and that hazardous waste from outside entities could not be stored on site for more than 24 hours. The facility corrected the deficiencies and no further action was taken.

10) Findings

On April 24, 2013, Hector M. Danois with the EPA, along with Janine Kramer with Florida Department of Environmental Protection (FDEP), arrived at the facility. At approximately 9:40 a.m., Mr. Anthony McDonald and Mr. Terry Sutton, Consultant, received the inspectors. The inspectors introduced themselves, showed their credentials and explained the purpose of the visit. The following areas were inspected:

Warehouse Area

This is the area where LR stores the spent lamp in multiple size containers. The containers are unloaded and placed in the counting area where, the number of containers described on the shipping papers are verified with the number of containers delivered by the trucking company. The warehouse is divided into 10 rows where the containers are stored before processing. This is done usually within 72 hours.

Containers on the same shipping paper are kept together in pallets or sometimes shrink wrapped together for better tracking. A copy of the shipping paper is kept with the containers. A written log is maintained by personnel identifying the shipping paper number, the generator of the waste, the date the waste arrived on-site, and the date the waste was verified. Once the waste is compared to the bill of lading or manifest and verified, the pallets are placed in one of the 10 rows. Rows 1-9 store whole bulbs and row 10 is used for crushed bulbs.

At the time of the inspection, three employees were sorting boxes of compact fluorescent light bulbs (CFL) and removing them from their packaging (Figure 1). The inspection team noticed that while employees were sorting the CFL, they were causing the breakage of the lamps.

Pursuant to F.A.C. 62-730.185(1) - Standards for Universal Waste Management, the Department adopts by reference 40 C.F.R. Part 273 revised as of July 1, 2008. LR is in apparent violation of F.A.C. 62-737.400(5) (40 C.F.R. § 273.33(d). This regulation requires a large quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

1. Employees wear gloves for protection when separating the lamps during this process. They are trained to use caution while handling the lamps. However, in separating lamps to count, there may be occasions in which the lamps were previously cracked or they are incidentally broken due to the personal protective equipment bulk. (Figure 2)

While walking through the container storage area, the inspectors noticed the following:

Some containers of fluorescent bulbs were observed unlabeled (Figures 2 and 3)

2. This pallet (Figure 2) is located in the receiving area. It had just been unloaded from a truck. The boxes were all included in the shrink wrapped pallet. As such, the pallet needed just one Universal Waste Lamp Label. The copy of the bill of lading had not been produced and applied as the material was being inventoried, logged, and received. It would then be placed in the storage area for processing.
3. This extra box (Figure 3) should have been wrapped with the pallet which had the receiving label. LR continues to review the procedures, audit the warehouse, and train on proper packaging and labeling.

Four 55-gallon drums of "wet" crushed bulbs were noted in Row 10. According to Mr. McDonald, wet-crushed-bulbs tend to clog the processor. LR sends the wet material to a sister facility in Indiana. None of these drums were over the year storage time.

Inspectors noticed some crush glass on top of containers in Row 10 (Figure 4).

4. Any broken glass (Figure 4) should be swept immediately and placed in the Floor Sweep/Debris Accumulation drum. Employees have been retrained on proper procedures of glass containment and housekeeping and the necessity of a prompt resolution to any issue. Exhibit #1



LIGHTING RESOURCES, LLC

1007 SW 16th Lane
Ocala, FL 34471
(352) 509-3001 • Fax (352) 509-3012
(855) 502-3001



Training Session for 9/25/13

Exhibit #1

Subject: Procedures for Handling Product in the warehouse.

1. All skids/boxes must be labeled correctly. If the contents on the skid is all the same customer/generator, it must be wrapped securely and labeled with a copy of the manifest attached. If there are additional boxes on top of the skid, each box must be labeled separately.
2. Housekeeping. If there is broken glass/lamps, it must be cleaned in a proper and swift manner.
3. Plastic drum caps. After counting and the product is moved to the storage area, the plastic drum caps can't be used. We must use the fiber lid to prevent spillage.

Print

Sign

Date

Aaron Chappell Aaron Chappell 10/10/13

Willie Barnes Willie Barnes 10/10/13

Reuben Anderson Reuben Anderson 10-10-13

Brent Palmer Tree Brent Palmer Tree 10-10-13

Gloy McCranie Gloy McCranie 10/10/13

Trainers Signature

Jason Muehlenhoff

Several boxes of projection lamps were found in Row 1. According to Mr. McDonald the projection lamps need some dismantling prior to processing, so employees work on them as they can. None of the boxes had been stored greater than one year.

On some containers, LR uses plastic wraps instead of a lid. These lids don't seal or prevent spillage and they are considered open containers (Figure 5).

5. This type of cover is normally used for the purpose of receiving/counting. Fiber drum lids are to be used to close the fiber drum when placed in storage. LR continues to review the policy and procedures for receiving vs. storage to be sure that fiber drums are properly covered.

Pursuant to F.A.C. 62-730.185(1)-Standards for Universal Waste Management, the Department adopts by reference 40 C.F.R. Part 273 revised as of July 1, 2008. LR is in apparent violation of F.A.C. 62-737.400(5)(b)(i) (40 C.F.R. § 273.34(e)). This regulation requires a large quantity handler of universal waste mark or label clearly each lamp, or container or package in which such lamps are contained with any one of the following phrases: "Universal Waste-Lamp(s), "or "Waste Lamp(s), "or "Used Lamp(s). "

LR failed to adhere to a condition for exemption from F.A.C. Chapter 62-730 [40 C.F.R. §§264.31 and 265.31]. This regulation requires owners and operators of hazardous waste management facilities to maintain and operate their facilities to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Lighting Resources make every effort to be sure that all pallets, drums, or individual boxes are properly labeled. We also recognize the responsibility to minimize any breakage and yet at the same time we do require employees to wear protective gloves and glasses to protect them from any glass cuts.

A hazardous waste storage area is located near the loading dock, across the spent lamp container storage area. The area is marked with yellow tape. At the time of the inspection, LR had one 55- gallon drum of hazardous waste storing floor sweepings. The drum was labeled and dated.

The universal waste batteries storage area is located on the back wall of the warehouse. The batteries (Lead Acid, Lithium, Alkaline, Nickel-Cadmium and Nickel Metal Hydride) are sorted and placed into 55-gallon drums. At the time of the inspection, the area was storing five 55- gallon drums (See Figure 6). The inspection team noticed that one of the

55-gallon drums was not labeled. In addition, near the battery storage area, a pallet of seven 5-gallon buckets and a cart with two boxes and a 5-gallon bucket, all storing batteries were not labeled (See Figure 7 and 8).

Pursuant to F.A.C. 62-730.185(1) - Standards/or Universal Waste Management, the Department adopts by reference 40 C.F.R. Part 273 revised as of July 1, 2008. Therefore, LR is in apparent violation of F.A.C. 62-730.185(1) [40 C.F.R. § 273.14(a)]. This regulation requires that universal waste lamps or a container or package in which such lamps are contained must be labeled or marked clearly with any one of the following phrases: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."

6. (Figure 6) The drums in the permanent storage area for batteries were correctly labeled. The drums in the foreground were in receiving and staged for counting, sorting and inventorying.
7. (Figures 7 & 8) These containers were located in the receiving area. These items had just been unloaded and were in the process of being inventoried, properly labeled, and stored.

Processing Room

This is the area where LR processes the mercury lamps. LR uses a Balcan MP8000 lamp processor that is located inside a room with an air filtering system and negative pressure. The processor separates the glass, end caps and phosphor powder from mercury containing lamp, operating all day during each business day.

The lamps are fed into the processor on a conveyor belt and pass through crushers. Phosphor powder is continuously pulled out of the system by air handlers. Glass and metal end caps are separated and fall out into separate containers. Lamps are processed by type with one side of the machine handling long tubes and the other side processing crushed lamps, HID lamps, CFLs, and other miscellaneous lamps. Plastic shields are removed from bulbs prior to processing in the warehouse. Currently, end caps are recycled and glass is sent to the landfill; however, LR is in the process of arranging for the glass to be used at American Cement in Sumterville, FL. Phosphor powder is sent to an LRL facility in Indiana for retorting.

At the time of the inspection, employees were processing bulbs. The processor has two 55-gallon satellite accumulation area (SAA) drums. The drums were labeled. Air filters for the room are changed once a week and disposed of as hazardous waste. Filters inside the processor have not been changed since installation of the equipment. PPE from employees is disposed of as hazardous waste. At the time of the inspection, the processing room was storing four 55-gallon drums of phosphor powder. All of the drums were labeled and dated (4/18/13, 4/16/13, 4/18/13 and 4/22/13).

Process Glass Storage Warehouse

This is the area where LR stores the process glass. At the time of the inspection, the area was storing four cubic yard bags of crushed processed glass and two cubic yard bags of metal end caps. In addition, the warehouse contained over pack drums, new buckets and shipping containers. The FDEP inspector collected two samples of crushed processed glass from the two cubic yard bags. Both sample results indicate the glass is non-hazardous.

Recordkeeping

Documents and records that the inspection team reviewed included: weekly inspections, manifests (2012 and 2013), emergency plan, 12 month rolling average, personnel hazardous waste management training documentation and certificates.

Manifest:

LR's permit allows a maximum storage of 15 55-gallon drums of phosphor powder on site. Manifests reviewed during the inspection show that the facility exceeded the storage limit on four separate occasions: November 2012, December 2012, January 2013, and March 2013.

LR is in apparent violation of Permit Condition-Part II (B)(3)-Specific Operating Conditions, which requires that the maximum volume of phosphor powder in storage exceed 11,250 pounds or 15 55-gallon drums.

Lighting Resources storage is limited to 15 drums for a maximum weight of 11,250 pounds. However, two additional drums are always being filled on the Balcan at any time. Records do show that on the shipping date personnel would pull one or two of the drums of phosphor powder currently being used on the Balcan to send along with the stored drums. All four occasions show that our storage was 15 or less. The following schedule provides the supporting information for the four shipments..

Lighting Resources, LLC Phosphor Powder Table 1

Date	Hazardous Waste Manifest	Description	Quantity	Container	Weight	Comments
11/1/2012 Exhibit #2 a,b	010473507	Phosphor Powder	16	drums	6,893	Less than 11,250 pounds per permit; 14 drums were from storage; 2 drums were removed from the Balcan to ship on the same day
12/7/2012 Exhibit#3 a,b	010473510	Phosphor Powder	16	drums	7,051	Less than 11,250 lbs per permit; 15 drums were from storage; 1 drum was pulled from the Balcan to ship
1/10/2013 Exhibit#4 a,b	010473511	Phosphor Powder	19	drums	8,498	Less than 11,250 pounds per permit; 1 drum was pulled from the Balcan to ship; 15 drums were pulled from storage; 3 drums were finely crushed from a customer. (see Note A)
3/28/2013 Exhibit#5 a,b	009579512	Phosphor Powder	15	drums	7,480	Less than 11,250 pounds per permit; 15 drums were pulled from storage

Note A: LR received 33 drums of crushed lamps from Lamp Recycling Company (Exhibit #5 c,d) . LR was able to run 30 drums through the Balcan machine. Three were finely crushed glass. LR attempted to run one of the finely crushed drums. Because of the sand consistency the machine was not able to process it properly. The drum run was cancelled which resulted in a reduction from the total pounds of 524 to a remaining weight of 388 pounds (Drum #78). The other two drums, 77 and 79 were shipped with 78 to Indiana for processing. (They have additional equipment to handle finely crushed glass.) These three drums of finely crushed glass should have been listed on the Hazardous Waste Manifest as crushed fluorescent lamps instead of as phosphor powder. (The Balcan process produces on average less than one drum per day.)

LR records indicate on all four occasions that we were within the phosphor powder storage permit requirements and were not, therefore, in violation of *Permit Condition-Part II (B)(3)- Specific Operating Conditions, which requires that the maximum volume of phosphor powder in storage be 11,250 pounds or 15 55-gallon drums.*

Calcium Phosphate Powder

Drum #	Manifest #	Type	Weight	Pull Date	Out Date	Via	Freehold Manifest #
41	010473507JJK	Powder	406	10/5/2012	11/1/2012	Freehold	M137045 x
42	010473507JJK	Powder	495	10/8/2012	11/1/2012	Freehold	M137045 x
43	010473507JJK	Powder	443	10/12/2012	11/1/2012	Freehold	M137045 x
44	010473507JJK	Powder	563	10/14/2012	11/1/2012	Freehold	M137045 x
45	010473507JJK	Powder	370	10/9/2012	11/1/2012	Freehold	M137045 x
46	010473507JJK	Powder	440	10/15/2012	11/1/2012	Freehold	M137045 x
47	010473507JJK	Powder	382	10/18/2012	11/1/2012	Freehold	M137045 x
48	010473507JJK	Powder	412	10/18/2012	11/1/2012	Freehold	M137045 x
49	010473507JJK	Powder	339	10/19/2012	11/1/2012	Freehold	M137045 x
50	010473507JJK	Powder	538	10/24/2012	11/1/2012	Freehold	M137045 x
51	010473507JJK	Powder	464	10/23/2012	11/1/2012	Freehold	M137045 x
52	010473507JJK	Powder	462	10/25/2012	11/1/2012	Freehold	M137045 x
53	010473507JJK	Powder	471	10/26/2012	11/1/2012	Freehold	M137045 x
54	010473507JJK	Powder	460	10/29/2012	11/1/2012	Freehold	M137045 x
55	010473507JJK	Powder	289	11/1/2012	11/1/2012	Freehold	M137045 x
56	010473507JJK	Powder	359	11/1/2012	11/1/2012	Freehold	M137045 x
			6893				

Exhibit # 9a

Exhibit # 26

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number FLR000070545	2. Page 1 of 1	3. Emergency Response Phone 800-224-3524-Chemical	4. Manifest Tracking Number 010473507 JJK	
5. Generator's Name and Mailing Address Lighting Resources LLC 1507 SW 16TH AVE Ocala, FL 34471 USA			Generator's Site Address (if different than mailing address)			
Generator's Phone: 352-509-3009 James Miller						
6. Transporter 1 Company Name Pittsburg Industries			U.S. EPA ID Number NID-04120-04			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address Lighting Resources LLC 456 Palm Blvd Beverly Hills, CA 90210 USA			U.S. EPA ID Number PAC000000000			
Facility's Phone: 310-855-3854						
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 Wt./Vol.	13. Waste Codes
		No.	Type			
1.	Mercury Contaminated Devices - 4, 100g/17 E911	2	DF	190	P	D009
2.	P2 Hazardous Waste Solid 2.100 (P2) 100% Mercury Debris Floor Sweeping	1	DR	240	P	D009
3.	P2 Hazardous Waste Solid 2.100 (P2) 100% Mercury Debris Floor Sweeping	16	DR	6893	P	D009
4.						
14. Special Handling Instructions and Additional Information TSCA 12						
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 For LRL Ocala Anthony M. McDonald		Signature Anthony M. McDonald		Month 11	Day 1	Year 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 STEPHEN J. GORNAH		Signature		Month 11	Day 1	Year 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						
18b. Alternate Facility (or Generator)				Manifest Reference Number: 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. H010	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 Jason Muhlenkamp		Signature Jason Muhlenkamp		Month 11	Day 14	Year 12

Calcium Phosphate Powder

Drum #	Manifest #	Type	Weight	Pull Date	Out Date	Via	Freehold Manifest #	
57	010473510JJK	Powder	473	11/5/2012	12/7/2012	LRL - Freehold		x
58	010473510JJK	Powder	496	11/6/2012	12/7/2012	LRL - Freehold		x
59	010473510JJK	Powder	372	11/8/2012	12/7/2012	LRL - Freehold		x
60	010473510JJK	Powder	382	11/9/2012	12/7/2012	LRL - Freehold		x
61	010473510JJK	Powder	406	11/13/2012	12/7/2012	LRL - Freehold		x
62	010473510JJK	Powder	486	11/15/2012	12/7/2012	LRL - Freehold		x
63	010473510JJK	Powder	450	11/15/2012	12/7/2012	LRL - Freehold		x
64	010473510JJK	Powder	444	11/19/2012	12/7/2012	LRL - Freehold		x
65	010473510JJK	Powder	393	11/20/2012	12/7/2012	LRL - Freehold		x
66	010473510JJK	Powder	486	11/26/2012	12/7/2012	LRL - Freehold		x
67	010473510JJK	Powder	423	11/27/2012	12/7/2012	LRL - Freehold		x
68	010473510JJK	Powder	542	11/28/2012	12/7/2012	LRL - Freehold		x
69	010473510JJK	Powder	505	11/29/2012	12/7/2012	LRL - Freehold		x
70	010473510JJK	Powder	417	11/30/2012	12/7/2012	LRL - Freehold		x
71	010473510JJK	Powder	385	12/3/2012	12/7/2012	LRL - Freehold		x
72	010473510JJK	Powder	391	12/6/2012	12/7/2012	LRL - Freehold		x
			7051					

Exhibit # 3a

Exhibit #36

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number FLR000070565	2. Page 1 of 1	3. Emergency Response Phone 800-225-3524-Chemtel	4. Manifest Tracking Number 010473510 JJK		
5. Generator's Name and Mailing Address Lighting Resources, LLC 1007 SW 16th Lane Ocala, FL 34471 USA		Generator's Site Address (if different than mailing address)					
Generator's Phone: 352-509-3001-James Miller							
6. Transporter 1 Company Name Lighting Resources, LLC				U.S. EPA ID Number FLR000070565			
7. Transporter 2 Company Name Freehold Cartage, Inc.				U.S. EPA ID Number NJD054126164			
8. Designated Facility Name and Site Address Lighting Resources, LLC 498 Park 800 Drive Greenwood, IN 46143 USA				U.S. EPA ID Number WIC000351337			
Facility's Phone: 317-888-3889							
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 Wt./Vol.	13. Waste Codes	
		No.	Type				
1.	RQ, Hazardous Waste, Solid, 9, NA3077, PGIII, (Calcium Phosphate Powder) ERG 172	16	DM	7051	P	D009	
2.	RQ, Hazardous Waste Solid, N.O.S., 9, NA3077, PGIII (Mercury Debris Filters)	3	DF	72	P	D009	
3.	RQ, Hazardous Waste, Solid, 9, NA3077 (Mercury Lamp Ampoules) ERG 172	1	DF	53	P	D009	
4.	RQ, Used Mercury Containing Equipment, 8, UN2809, PGIII ERG # 172	3	DF	76	P	D009	
14. Special Handling Instructions and Additional Information							
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 Anthony M. McDonald				Signature <i>Anthony M. McDonald</i>		Month Day Year 12 7 12	
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 Carlos Negron				Signature <i>Carlos Negron</i>		Month Day Year 12 7 12	
Transporter 2 Printed/Typed Name Joel P. Schuchter				Signature <i>Joel P. Schuchter</i>		Month Day Year 12 07 12	
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. H010		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 Jason Muhlentkamp				Signature <i>Jason Muhlentkamp</i>		Month Day Year 12 26 12	

Calcium Phosphate Powder

Drum #	Manifest #	Type	Weight	Pull Date	Out Date	Via	Freehold Manifest #
73	010473511JJK	Powder	380	12/10/2012	1/10/2013	Freehold	M134798 x
74	010473511JJK	Powder	414	12/11/2012	1/10/2013	Freehold	M134798 x
75	010473511JJK	Powder	453	12/11/2012	1/10/2013	Freehold	M134798 x
76	010473511JJK	Powder	455	12/13/2012	1/10/2013	Freehold	M134798 x
77	010473511JJK	Powder	563	12/13/2012	1/10/2013	Freehold	M134798 x
78	010473511JJK	Powder	388	12/13/2012	1/10/2013	Freehold	M134798 x
79	010473511JJK	Powder	487	12/13/2012	1/10/2013	Freehold	M134798 x
80	010473511JJK	Powder	467	12/17/2012	1/10/2013	Freehold	M134798 x
81	010473511JJK	Powder	470	12/21/2012	1/10/2013	Freehold	M134798 x
82	010473511JJK	Powder	362	12/31/2012	1/10/2013	Freehold	M134798 x
83	010473511JJK	Powder	412	12/28/2012	1/10/2013	Freehold	M134798 x
84	010473511JJK	Powder	486	12/18/2012	1/10/2013	Freehold	M134798 x
85	010473511JJK	Powder	438	1/2/2013	1/10/2013	Freehold	M134798 x
86	010473511JJK	Powder	484	1/4/2013	1/10/2013	Freehold	M134798 x
87	010473511JJK	Powder	386	1/5/2013	1/10/2013	Freehold	M134798 x
88	010473511JJK	Powder	505	1/2/2013	1/10/2013	Freehold	M134798 x
89	010473511JJK	Powder	434	1/9/2013	1/10/2013	Freehold	M134798 x
90	010473511JJK	Powder	489	1/8/2013	1/10/2013	Freehold	M134798 x
92	010473511JJK	Powder	425	1/10/2013	Balcon	Freehold	M134798 x
			8498				

Exhibit # 4a

77 finely crushed glass
 78 finely crushed glass * Partial
 79 finely crushed glass

Exhibit #46

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number		2. Page 1 of		3. Emergency Response Phone		4. Manifest Tracking Number											
								010473511 JJK											
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)																	
Generator's Phone:		6. Transporter 1 Company Name								U.S. EPA ID Number									
7. Transporter 2 Company Name		U.S. EPA ID Number																	
8. Designated Facility Name and Site Address		U.S. EPA ID Number																	
Facility's Phone:		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	
GENERATOR		1.		2.		3.		4.		1448		100		101		104			
14. Special Handling Instructions and Additional Information		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		Signature		Month		Day		Year							
TRANSPORTER INT'L		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.:		Transporter signature (for exports only):											
TRANSPORTER		17. Transporter Acknowledgment of Receipt of Materials		Transporter 1 Printed/Typed Name		Signature		Month		Day		Year							
SIGNATED 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:		U.S. EPA ID Number											
18b. Alternate Facility (or Generator)		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									

Calcium Phosphate Powder

Drum #	Manifest #	Type	Weight	Pull Date	Out Date	Via	Freehold Manifest #		
120	009579512JJK	Powder	489	2/27/2013	3/28/2013	Freehold	M152006	x	Out of Sequence
121	009579512JJK	Powder	559	3/27/2013	3/28/2013	Freehold	M152006	x	Out of Sequence
122	009579512JJK	Powder	449	2/28/2013	3/28/2013	Freehold	M152006	x	Out of Sequence
123	009579512JJK	Powder	557	3/4/2013	3/28/2013	Freehold	M152006	x	Out of Sequence
124	009579512JJK	Powder	530	3/4/2013	3/28/2013	Freehold	M152006	x	Out of Sequence
125	009579512JJK	Powder	501	3/6/2013	3/28/2013	Freehold	M152006	x	Out of Sequence
126	009579512JJK	Powder	486	3/8/2013	3/28/2013	Freehold	M152006	x	Out of Sequence
127	009579512JJK	Powder	494	3/8/2013	3/28/2013	Freehold	M152006	x	Out of Sequence
128	009579512JJK	Powder	533	3/13/2013	3/28/2013	Freehold	M152006	x	Out of Sequence
129	009579512JJK	Powder	449	3/13/2013	3/28/2013	Freehold	M152006	x	Out of Sequence
130	009579512JJK	Powder	526	3/15/2013	3/28/2013	Freehold	M152006	x	Out of Sequence
131	009579512JJK	Powder	564	18-Mar	3/28/2013	Freehold	M152006	x	Out of Sequence
132	009579512JJK	Powder	432	20-Mar	3/28/2013	Freehold	M152006	x	Out of Sequence
133	009579512JJK	Powder	462	2-Mar	3/28/2013	Freehold	M152006	x	Out of Sequence
134	009579512JJK	Powder	449	22-Mar	3/28/2013	Freehold	M152006	x	Out of Sequence
			7480						

Exhibit # 5a

Exhibit #5b

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number RLR000070000	2. Page 1 of	3. Emergency Response Phone 800-225-3844-CH2M	4. Manifest Tracking Number 009579512 JJK			
5. Generator's Name and Mailing Address Lighting Resources, LLC 1007 SW 10th Lane Ocala, FL 34471 USA				Generator's Site Address (if different than mailing address)				
Generator's Phone: 352-509-5101				U.S. EPA ID Number W0054126124				
6. Transporter 1 Company Name Freemold Cartage Inc				U.S. EPA ID Number				
7. Transporter 2 Company Name				U.S. EPA ID Number				
8. Designated Facility Name and Site Address Lighting Resources, LLC 496 Park 600 Drive Greensboro, NC 27403 USA				U.S. EPA ID Number W0000051387				
Facility's Phone: 317-338-3365								
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					
X 1.	HA 3077, RC Hazardous Waste, Solid, 9, PGII, Calcium Phosphate Powder, ERG 172	15	DM	3408	K	009		
X 2.	HA 3077, RC, Hazardous Waste, Solid, 9, PGII, (Mercury Contaminated Debris PPE)	1	DM	92	K	009		
X 3.	HA 3077, RC, Hazardous Waste, Solid, PGII (Mercury Debris Floor Sweepings)	2	DM	168	K	009		
X 4.	HA 3077, Mercury Contaminated Devices, 9, PGII	1	DM	30	K	009		
14. Special Handling Instructions and Additional Information								
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 Francisco VOS9002				Signature <i>Francisco VOS9002</i>		Month Day Year 3/28/13		
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" 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 STEVEN T. CARROLL				Signature <i>STEVEN T. CARROLL</i>		Month Day Year 3/28/13		
Transporter 2 Printed/Typed Name 773				Signature <i>3031</i>		Month Day Year 3/28/13		
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input checked="" type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
Manifest Reference Number: 20 45 21 C								
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.			5.			6.		
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 Francisco VOS9002				Signature <i>Francisco VOS9002</i>		Month Day Year 3/28/13		

Exhibit # 5c

1MW 188055

SHIPPER (Complete Name, Address, & Zip Code) Embarcador		(3) BOOKING NO. Reserva No.	(3a) SCAC Code	(3a) BILL OF LADING/INVOICE NO. Conocimiento de Embarque
LAMP RECYCLING COMPANY MUNOZ RIVERA AVE. 1002 COND. OLIMPO PLAZA SUITE 403 SAN JUAN, PR 00927 TEL. (787) 758-1930 TEL. (787) 384-1930		CAT674252	CPRC	SJUN2M045624
(5) CONSIGNEE (Complete Name, Address, & Zip Code) Consignado a: NOT NEGOTIABLE UNLESS CONSIGNED TO ORDER		(3b) DATE Fecha 11 DEC 12	(4) EXPORT REFERENCES Referencias de Exportación	
LIGHTING RESOURCES INC C/O AIR CYCLE CORPORATION 5481 JET PORT INDUSTRIAL BLVD. TAMPA, FL 33624		(6) FORWARDING AGENT Agente Embarcador - Referencias	FMC NO.	CHB NO.
(7) NOTIFY PARTY (Complete Name, Address, & Zip Code) Dirigir Notificación de Llegada a:		(8) ALSO NOTIFY - ROUTING & INSTRUCTIONS También Notificar - Ruta Doméstica/Instrucciones de Exportación		
LIGHTING RESOURCES INC 5481 JET PORT INDUSTRIAL BLVD. TAMPA, FL 33624				
(9) VESSEL Name VOYAGE Viaje	FLAG Bandera	(10) PLACE OF RECEIPT Carga Recibida en:	(11) RELAY POINT Punto de Conexión	(12) POINT & COUNTRY OF ORIGIN OF GOODS Lugar y País de Origen
146N	US	(13) PORT OF LOADING Puerto de Carga	(14) LOADING PIER / TERMINAL Muelle	
SAN JUAN		SAN JUAN, PR	ISLA GRANDE	HOUSE TO HOUSE
(15) PORT OF DISCHARGE Puerto de Descarga	(17) PLACE OF DELIVERY Lugar de Entrega de la Carga	(18) ORIGINALS TO BE RELEASED AT Originales para Entregarse en		
JACKSONVILLE, FL		SAN JUAN, PR ROUTE T		

PARTICULARS FURNISHED BY SHIPPER

(19) MARKS & NOS. / CONTAINER NOS. / Marcas y Números	(20) NO. OF TIE / CONTS. / PKGS. / No. de Purgones / Bultos	(21) DIM / M	(22) DESCRIPTION OF CARGO Contenido Según Embarcador	(23) WEIGHT Libras/Kilos	(24) MEASUREMENT Medidas
CIU 2297691 EAL# 04100553	1 20FT		CONTAINER S.L.A.C.: FLUORESCENT LAMPS AND ELECTRONIC SCRAP ALL DESTINED FOR RECYCLING DESCRIPTION: UNIVERSAL WASTE MANIFEST 33 DRUMS CONTAINING CRUSHED FLOURESCENT LAMPS LRC12121 1 PALLET OF ELECTRONICS SCRAP-BATTERIES LRC12121 2 PALLETS OF ELECTRONIC EQUIPMENT - LAMPS FIXTURES LRC12121	25801 1170R	
SHIPPER LOAD AND COUNT OCEAN FREIGHT PREPAID					

HAZARD DECLARATION - 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 LABELLED ACCORDING TO ALL APPLICABLE INTERNATIONAL AND NATIONAL GOVERNMENTAL REGULATIONS.

EMERGENCY CONTACT:

TEL NO.

FREIGHT CHARGES Flete	RATED AS Flete Básico	PER	RATE Tarifa	TO BE PREPAID IN US DOLLARS Prepagado en Dolares U.S.	TO BE COLLECTED IN US DOLLARS A Cobrar en Dolares U.S.	FOREIGN CURRENCY Moneda Local
Lighting Resource 7 SW 16th Lane Wq, FL 34471						
TOTALS						

BILL OF LADING CONSISTS OF CONDITIONS AND INFORMATION PRINTED ON THE FRONT AND BACK OF THIS DOCUMENT.

NOT TO SECTION 7 OF CONDITIONS, IF THE SHIPMENT IS TO BE DELIVERED TO CONSIGNEE WITHOUT RECOURSE ON THE SHIPPER, THE SHIPPER SHALL SIGN THE FOLLOWING STATEMENT: THE CARRIER SHALL NOT MAKE DELIVERY OF SHIPMENT WITHOUT PAYMENT OF FREIGHT AND ALL OTHER LAWFUL CHARGES.

NATURE OF SHIPPER

BY LIMITED UNLESS INCREASED VALUE DECLARED BELOW; ALL AS SPECIFIED IN SECTION 18:

INCREASED VALUE:

ICABLE ONLY WHEN USED A THROUGH TRANSPORTATION BILL OF LADING
NOTE WHETHER ANY OF THE CARGO IS HAZARDOUS MATERIAL UNDER DOT, IMDG, OR OTHER REGULATIONS
INDICATE THE CORRECT COMMODITY NUMBER IN DESCRIPTION OF CARGO ABOVE.

PAGE 1 OF 2

IN WITNESS WHEREOF THE CARRIER HAS SIGNED ORIGINAL BILLS OF LADING ALL OF THE SAME TENOR AND DATE, ONE OF WHICH BEING ACCOMPANIED THE OTHERS TO STAND VOID.

BY

CARR: CROWLEY PUERTO RICO SERVICES INC

BY

FOR SHIPPER

Exhibit # 5d

Waste

313#
253#
265#

Batteries

449# mixed

HID
9

Crushed

539#
555#
577#
575#
575#
533#
559#
552#
535#
547#
568#
611#
596#
564#
591#
497#
554#
554#

555#
537#
585#
552#
531#
563#
541#
486#
568#
532#
556#
568#
524#
547#
584#

LR's permit allows maximum storing of two 55-gallon drums of mercury containing devices on site. Manifests reviewed during the inspection show that the facility exceeded the storage limit on six occasions: November 2012, December 2012, January 2013, and twice in February 2013 and April 2013.

LR is in apparent violation of Permit Condition-Part II (B)(3)-Specific Operating Conditions, which requires that the maximum volume is two 55-gallon drums of mercury containing devices on site.

The maximum volume of Mercury Article/Devices is two 55-gallon drums. All items listed on the manifests were not drums (DM) but 5 gallon buckets (DF). The weight is under the 1,500 pounds. The weight range is from 30 kilos to 239 pounds. On all six occasions LR was under the volume and weight limits as shown in the schedule.

Lighting Resources, LLC Mercury Articles/Devices Table 2

Date	Hazardous Waste Manifest	Description	Quantity	Container	Weight	Comments
11/1/2012 Exhibit #6 a,b	010473507	Mercury Articles/Devices	8	5 gal bucket	190	DF not DM; less than 1500 lbs
12/7/2012 Exhibit #7 a,b	010473510	Mercury Articles/Devices	3	5 gal bucket	76	DF not DM; less than 1500 lbs
1/10/2013 Exhibit #8 a,b	010473511	Mercury Articles/Devices	5	5 gal bucket	151	DF not DM; less than 1500 lbs
2/7/2013 Exhibit #9 a,b	010473512	Mercury Articles/Devices	3	5 gal bucket	216	Listed as DM; should have been DF; less than 1500 lbs
2/28/2013 Exhibit #10 a,b,c	010473514	Mercury Articles/Devices	7	5 gal bucket	239	DF not DM; less than 1500 lbs
4/18/2013 Exhibit #11 a,b	009579522	Mercury Articles/Devices	7	5 gal bucket	30	DF not DM; less than 1500 lbs; kilos not pounds

Manifest showed that in March 2013, LR received ten 55-gallon drums of mercury

Lighting Resources, LLC.

RCRA CEI

April 24, 2013

Page 8

		Mercury Devices / Elemental							
BoL #	Gen/Cust.	Type	Weight	P/U Date	In Date	Out Date	Via	Freehold Manifest #	
010473507JJJ	LRL - Ocala	Mercury Devices	190		11/1/2012	11/1/2012	Freehold	M137045	x
010473507JJJ	LRL - Ocala	Floor Debris	260		11/1/2012	11/1/2012	Freehold	M137045	x
			450						

Exhibit #6a

Exhibit #66

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number		2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number 010473507 JJK		
		5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)				
Generator's Phone:								
6. Transporter 1 Company Name						U.S. EPA ID Number		
7. Transporter 2 Company Name						U.S. EPA ID Number		
8. Designated Facility Name and Site Address						U.S. EPA ID Number		
Facility's Phone:								
GENERATOR	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	
					No.	Type		12. Unit WL/Vol.
		1.						13. Waste Codes
		2.						
		3.						
	4.							
14. Special Handling Instructions and Additional Information								
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				Signature		Month Day Year		
TRANSPORTER INT'L	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				Signature		Month Day Year	
TRANSPORTER	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:				
SIGNATED FACILITY	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		

Mercury Devices / Elemental								
BoL #	Gen/Cust.	Type	Weight	P/U Date	In Date	Out Date	Via	Freehold Manifest #
010473510JJK	LRL - Ocala	Mercury Devices	76		6-Dec	7-Dec	LRL - Freehold	x
010473510JJK	LRL - Ocala	Mercury Filters	72		6-Dec	7-Dec	LRL - Freehold	x
010473510JJK	LRL - Ocala	Ampules	53		6-Dec	7-Dec	LRL - Freehold	x
			201					

Exhibit #79

Exhibit # 77D

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number FLR000070565	2. Page 1 of 1	3. Emergency Response Phone 800-225-3924-Chemtel	4. Manifest Tracking Number 010473510 JJK			
5. Generator's Name and Mailing Address Lighting Resources, LLC 1007 SW 16th Lane Ocala, FL 34471 USA					Generator's Site Address (if different than mailing address)			
Generator's Phone: 352-509-3001-James Miller								
6. Transporter 1 Company Name Lighting Resources, LLC					U.S. EPA ID Number FLR000070565			
7. Transporter 2 Company Name Freehold Cartage, Inc.					U.S. EPA ID Number NJ0054125164			
8. Designated Facility Name and Site Address Lighting Resources, LLC 498 Park 800 Drive Greenwood, IN 46143 USA					U.S. EPA ID Number IN0000351387			
Facility's Phone: 317-888-3889								
GENERATOR	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 Wt/Vol.	13. Waste Codes
				No.	Type			
	1.	RQ, Hazardous Waste, Solid, 9, NA3077, PGIII, (Calcium Phosphate Powder) ERG 172		16	DM	7051	P	0009
	2.	RQ, Hazardous Waste Solid, N.O.S., 9, NA3077, PGIII (Mercury Debris Filters)		3	DF	72	P	0009
	3.	RQ, Hazardous Waste, Solid, 9, NA3077 (Mercury Lamp Ampules) ERG 172		1	DF	53	P	0009
	4.	RQ, Used Mercury Containing Equipment, 8, UN2809, PGIII ERG # 172		3	DF	76	P	0009
14. Special Handling Instructions and Additional Information								
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 Anthony M. McDonald				Signature Anthony M. McDonald		Month Day Year 12 7 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.:	
	Transporter signature (for exports only):							
DESIGNATED FACILITY	17. Transporter Acknowledgment of Receipt of Materials							
	Transporter 1 Printed/Typed Name Carlos Negron		Signature [Signature]		Month Day Year 12 7 12			
	Transporter 2 Printed/Typed Name Joel [Signature]		Signature [Signature]		Month Day Year 12 07 12			
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. H010			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 Jason Muhlentkamp				Signature Jason Muhlentkamp		Month Day Year 12 26 12		

		Mercury Devices / Elemental						
								Freehold
BoL #	Gen/Cust.	Type	Weight	P/U Date	In Date	Out Date	Via	Manifest #
5501011	WM - Brookwood Medical Clinic	Devices	21	7-Jan	9-Jan	1/10/2013	Freehold	M134798
5501007	Brookwood Internists	Devices	61	7-Jan	9-Jan	1/10/2013	Freehold	M134798
010473511JJK	LRL - Ocala	Devices	14	9-Jan	9-Jan	1/10/2013	Freehold	M134798
010473511JJK	LRL - Ocala	Devices	9	9-Jan	9-Jan	1/10/2013	Freehold	M134798
010473511JJK	LRL - Ocala	Devices	31	9-Jan	9-Jan	1/10/2013	Freehold	M134798
010473511JJK	LRL - Ocala	Devices	15	9-Jan	9-Jan	1/10/2013	Freehold	M134798
151								

Exhibit #80

		Mercury Devices / Elemental						
								Freehold
BoL #	Gen/Cust.	Type	Weight	P/U Date	In Date	Out Date	Via	Manifest #
009579512JJJ	LRL - Ocala	Thermometers	45	4-Mar	3/4/2013	3/28/2013	Freehold	M152006
009579512JJJ	LRL - Ocala	Filter & Thermostat	6	4-Mar	3/4/2013	3/28/2013	Freehold	M152006
009579512JJJ	LRL - Ocala	Filter & Liquid Mercury	10	1-Mar	1-Mar	3/28/2013	Freehold	M152006
009579512JJJ	LRL - Ocala	Thermometer	13	1-Mar	1-Mar	3/28/2013	Freehold	M152006
			74					

Exhibit 9A

Form Approved. OMB No. 2050-0039

TRANSPORTER'S COPY

		Mercury Devices / Elemental							
								Freehold	
BoL #	Gen/Cust.	Type	Weight	P/U Date	In Date	Out Date	Via	Manifest #	
010473514JJK	LRL - Ocala	Devices	53	2/28/2013	2/28/2013	2/28/2013	Freehold	M159845	x
010473514JJK	LRL - Ocala	Filters	186	2/28/2013	2/28/2013	2/28/2013	Freehold	M159845	x
010473514JJK	LRL - Ocala	Accumulation	185	2/28/2013	2/28/2013	2/28/2013	Freehold	M159845	x
010473514JJK	LRL - Ocala	PPE	75	2/28/2013	2/28/2013	2/28/2013	Freehold	M159845	x
010473514JJK	LRL - Ocala	Ampules	153	2/28/2013	2/28/2013	2/28/2013	Freehold	M159845	x
			652						

Exhibit 10A

Exhibit # 10b

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number FLR000070662		2. Page 1 of 1/2		3. Emergency Response Phone 800-225-3924-Chemtrec		4. Manifest Tracking Number 010473514 JJK			
		5. Generator's Name and Mailing Address Lighting Resources, Inc. 1007 SW 18TH LANE OCALA, FL 34471-1105 Generator's Phone: 352-509-3001-James Miller						Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Freight Car 40406		U.S. EPA ID Number 100054127064									
7. Transporter 2 Company Name		U.S. EPA ID Number									
8. Designated Facility Name and Site Address Lighting Resources, Inc. 495 Park Road Drive Greenwood, IL 60139-1054 Facility's Phone: 317-889-3689		U.S. EPA ID Number 7020351367									
GENERATOR	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 Wt/Vol.	13. Waste Codes	
						No.	Type				
	1.	RD. Hazardous Waste, Solid, 9, 3002, P001, Calcium Phosphate Powder, ERG 172				121		6771			
	2.	RD. Hazardous Waste, Solid, 9, 3002, P001, Mercury Contaminated Debris (PPE)				1		75			
	3.	RD. Hazardous Waste, Solid, 9, 3002, P001, Mercury Lamp Ampoules, ERG 172				1	DM	153			
	4.	RD. Hazardous Waste, Solid, 9, 3002, P001, Mercury (Mercury), Debris				1		185			
14. Special Handling Instructions and Additional Information											
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 DORR L. JAMES Short						Signature 		Month Day Year 02/28/13			
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: <u>Bernard Winfree</u> Signature: Month Day Year: 02/28/13 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.		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: <u>James Miller</u> Signature: Month Day Year: 02/28/13											

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number FLR000070565	22. Page 2/2	23. Manifest Tracking Number 010473514 JJK	
24. Generator's Name Lighting Resources LLC					
25. Transporter Company Name Fredrick Contracting Inc				U.S. EPA ID Number MT0754124164	
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.
	Mercury Containing Devices/Components	7	05	239	P
32. Special Handling Instructions and Additional Information					
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)					

		Mercury Devices / Elemental						
BoL #	Gen/Cust.	Type	Weight	P/U Date	In Date	Out Date	Via	Freehold Manifest #
009579522JJK	LRL - Ocala	Devices	30	17-Apr	17-Apr	18-Apr	Freehold	M151115
009579522JJK	LRL - Ocala	Accumulation	72	17-Apr	17-Apr	18-Apr	Freehold	M151115
009579522JJK	LRL - Ocala	Mercury Contaminated Debris	123	17-Apr	17-Apr	18-Apr	Freehold	M151115
			225					

Exhibit # 11a

Exhibit #116

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number FLR000070865	2. Page 1 of 1	3. Emergency Response Phone 800-225-3924-Chemtel	4. Manifest Tracking Number 009579522 JJK			
5. Generator's Name and Mailing Address Lighting Resources, LLC 1007 SW 15th Lane Ocala, FL 34471 US			Generator's Site Address (if different than mailing address)					
Generator's Phone: 352-509-3001-James								
6. Transporter 1 Company Name Freehold Carriage, Inc			U.S. EPA ID Number NJ0064126164					
7. Transporter 2 Company Name			U.S. EPA ID Number					
8. Designated Facility Name and Site Address Lighting Resources, LLC 496 Park 500 Drive Greenwood, IN 46143 US			U.S. EPA ID Number IND000351357					
Facility's Phone: 317-868-3689								
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.	NA 3077, Mercury Contaminated Devices, 2, PGIII	7	DF	30	K	009	
	X 2.	NA3077, RG Hazardous Waste Solid, N O S E, PGII (Mercury Contaminated Crushed Glass)	5	DF	1273	K	009	
	X 3.	NA 3077, RG, Hazardous Waste, Solid, PGII (Mercury Debris Floor Sweepings)	1	DM	72	K	009	
	X 4.	NA 3077, RG, Hazardous Waste, Solid, 2 PGII (Mercury Contaminated Debris)	3	DF	123		009	
14. Special Handling Instructions and Additional Information								
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 James Shortt			Signature 			Month Day Year 4/18/13		
INTL	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.:					
	Transporter signature (for exports only):							
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials							
	Transporter 1 Printed/Typed Name STEPHEN J. CARAWAY			Signature 			Month Day Year 4/18/13	
DESIGNATED FACILITY	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. H010		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 Jason Muhlenkamp			Signature 			Month Day Year 5/17/13		
DESIGNATED FACILITY TO GENERATOR								

contaminated crushed glass from Costa Rica. The drums were shipped as a D009 hazardous waste. LR staff explained that the glass was from a mercury processor in Costa Rica that could not remove enough mercury to deem it non-hazardous waste and had to ship it off site for additional processing. The transporter was Freeport and the designated facility was the sister facility in Indiana (IND000351387).

LR is in apparent violation of 40 C.F.R. § 264.12(a)(1). This regulation requires the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source must notify the Regional Administrator in writing at least four weeks in advance of the date the waste is expected to arrive at the facility. Notice of subsequent shipments of the same waste from the same foreign source is not required.

Additionally, LR is not a registered 10-day transfer facility; therefore, hazardous waste is only allowed to remain on site for only 24 hours.

F.A.C. 62-730.171 (2)(a) requires the transporter who is owner or operator of a transfer facility which stores manifested shipments of hazardous waste for more than 24 hours but 10 days or less (hereinafter referred to as "the transfer facility") shall obtain an EPA/DEP identification number for each transfer facility location and notify the Department using Form 62-730.900(1)(b), "8700-12FL – Florida Notification of Regulated Waste Activity," effective date January 4, 2009 [adopted by reference in paragraph 62-730.150(2)(a), F.A.C.].

LR received a Foreign Notice import consent letter from Robert G. Heiss, Director Int'l Compliance Assurance Division of the EPA dated January 29, 2013 regarding this shipment. A copy of the letter was sent to Stanley Tam, Regional Coordinator, Region 4 on the same date. The letter provided verification that the Regional Coordinator had been notified and therefore, LR was not in violation of 40 C.F.R. § 264.12(a)(1). Upon being advised that Florida must also be notified, Bonnie Bishop-Clark forwarded notification to Janine Kraemer and John White at Florida DEP. See attached letters Exhibit #12 a,b. and Exhibit #13 a,b.

Regional coordinator, Region 4, Stanley Tam and Anthony Tripp, FDEP Engineer advised that the shipment from Costa Rica became universal waste when it entered Florida from a foreign source. While here it was universal waste. It would have been processed at the Florida facility under normal conditions. When it was determined that the material was too wet to run in the Balcan machine and had to be sent to an alternative facility for processing, LR notified the generator. They approved the alternative facility and authorized us to sign on their behalf a new hazardous waste manifest to ship to Indiana. The manifest was created on March 28, 2013 and the material shipped on March 28, 2013. See Attached Exhibit #14 a,b

The material was not hazardous upon receipt in Florida and therefore did not come under the 24 hour rule or the transfer facility rules noted above. The material was not "transferred" as it was manifested to Ocala. The alternative facility rule was applicable after the material was deemed unfit for processing by the Balcan machine. The Alternative Facility Hazardous Waste Manifest was created on material shipped with the

Lighting Resources, LLC.

RCRA CEI

April 24, 2013

Page 9

Exhibit # 12a



UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND COMPLIANCE
ASSURANCE

January 29, 2013

BONNIE BISHOP-CLARK
LIGHTING RESOURCES
1007 SW 16TH LANE
OCALA, FL 34471

Re: Foreign Notice ID: DRS-UN-AN-1056-2012
EPA Notice ID: 006282/11/13

Dear BONNIE BISHOP-CLARK:

Under the requirements in 40 CFR §§ 264.71(a)(3) and 265.71(a)(3) owners and operators of hazardous waste treatment, storage, and disposal facilities receiving hazardous waste from a foreign source must submit a copy of documentation confirming EPA's consent to the import of the hazardous waste at the same time they submit a copy of the RCRA hazardous waste manifest within thirty (30) days of each import shipment's delivery.

This letter serves as EPA's import consent documentation for the export of 20 Metric Tons of MERCURY, GLASS, PLASTIC from GEEP COSTA RICA, SRL, 25M SUR Y 75M OESTE DE SERICENTRO, EL GUARCO, CARTAGO, COSTA RICA to LIGHTING RESOURCES, 1007 SW 16TH LANE, OCALA, FL. Shipments for this notice may occur under EPA's consent from January 28, 2013, to January 27, 2014. This waste will be subject to all applicable federal and state laws and regulations.

EPA is providing this letter for your potential use and recordkeeping because your facility is listed as a receiving facility or interim receiving facility in the attached notification. If your facility is not required to submit a copy of the import consent documentation along with the RCRA hazardous waste manifest under §§ 264.71(a)(3) or 265.71(a)(3) during the period of consent listed above, then you may discard this letter.

The EPA Waste Import and Export Tracking System ID assigned to this notice is 006282/11/13.

The following waste streams have been consented to under notice 006282/11/13:

Exhibit #12b

Waste Stream 1: MERCURY, GLASS, PLASTIC

Waste Description: MERCURY, GLASS, PLASTIC

EPA Waste Code:

DOT Shipping Name:

DOT Hazard Class:

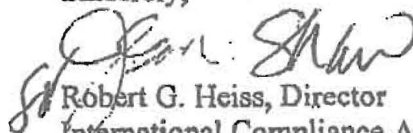
DOT I.D. No.

Total Volume to be Exported: 20 Metric Tons

Estimated Frequency: 4 loads Annually

If you have any questions regarding this correspondence, please contact Jean Shaw at telephone: 202-564-7111, telefax: 202-564-0025, or email: shaw.jean@epa.gov.

Sincerely,



Robert G. Heiss, Director
International Compliance Assurance Division
Office of Federal Activities

Attachment

cc: Stanley Tam
Regional Coordinator, Region 4



LIGHTING RESOURCES, LLC

1007 SW 16th Lane
Ocala, FL 34471
(352) 509-3001 • Fax (352) 509-3012
(855) 502-3001



Exhibit # 13a

October 10, 2013

Janine Kraemer, FL DEP Central District

John White, FL DEP Central District

RE: GEEP Foreign Shipment Notice

We are enclosing the notice for the foreign shipment in question from the U.S. EPA audit of April 25, 2013. As we understand the requirements of receiving a Foreign Shipment for the State of Florida, we wanted to register our notice, though late, for this shipment with the State of Florida Department of Environmental Protection.

We will use the attached form/format on all future Foreign Notices in a proper timeframe. We apologize for the delay in filing this notice. I appreciate all your assistance in regard to our receiving Foreign Shipments.

Best Regards,

Bonnie Bishop-Clark, Facility Manager



LIGHTING RESOURCES, LLC

1007 SW 16th Lane
Ocala, FL 34471
(352) 509-3001 • Fax (352) 509-3012
(855) 502-3001



Exhibit #136

TO: Janine Kraemer, FL DEP Central District
John White, FL DEP Central District

Per Florida DEP requirements, we are hereby notifying you that we received Foreign Notice from the EPA of an incoming shipment of Hazardous Waste:

Date of Notice: January 29, 2013
Foreign Notice ID: DRS-UN-AN-1056-2012
Generator: GEEP Costa Rica, SRL
25M SUR Y 75M OESTE DE SERICENTRO
EL Guarco, Cartago, Costa Rica
Material: 21 Drums of Crushed Lamps (Universal Waste in Florida)
Received at LR: March 22, 2013

Processed at Ocala Facility: 11 drums of crushed fluorescent lamps

Ten Drums of the crushed fluorescent lamps were the composition of sand and were not able to be processed at the Ocala Facility. It was necessary to locate an alternative facility that was able to process crushed glass of the consistency of sand. We contacted the generator for approval to use an alternative facility. They authorized the alternative facility and authorized us to sign the Hazardous Waste Manifest required to ship to the Indiana Facility. We created and signed the manifest and shipped the material on March 28, 2013.

Alternative Facility Manifest Dated: March 28, 2013
Shipped: March 28, 2013

Signed:

Bonnie Bishop-Clark

Dated:

October 10, 2013

C513229	10284265-2	Geep - Costa Rica	Crushed	660	6-Mar	22-Mar		Freehold -> IN	M152006	x
C513230	10284265-2	Geep - Costa Rica	Crushed	672	6-Mar	22-Mar		Freehold -> IN	M152006	x
C513231	10284265-2	Geep - Costa Rica	Crushed	675	6-Mar	22-Mar		Freehold -> IN	M152006	x
C513232	10284265-2	Geep - Costa Rica	Crushed	695	6-Mar	22-Mar		Freehold -> IN	M152006	x
C513233	10284265-2	Geep - Costa Rica	Crushed	695	6-Mar	22-Mar		Freehold -> IN	M152006	x
C513234	10284265-2	Geep - Costa Rica	Crushed	695	6-Mar	22-Mar		Freehold -> IN	M152006	x
C513235	10284265-2	Geep - Costa Rica	Crushed	567	6-Mar	22-Mar		Freehold -> IN	M152006	x
C513236	10284265-2	Geep - Costa Rica	Crushed	560	6-Mar	22-Mar		Freehold -> IN	M152006	x
C513237	10284265-2	Geep - Costa Rica	Crushed	565	6-Mar	22-Mar		Freehold -> IN	M152006	x
C513238	10284265-2	Geep - Costa Rica	Crushed	573	6-Mar	22-Mar		Freehold -> IN	M152006	x

Exhibit # 14a

Exhibit # 46

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number CES48	2. Page 1 of	3. Emergency Response Phone 507-226-9044	4. Manifest Tracking Number 009579511 JJK		
	5. Generator's Name and Mailing Address GEEF 25000 N 75th Ave SE Service Rd W Garage Costa Rica Costa Rica		Generator's Site Address (if different than mailing address)			
Generator's Phone:		6. Transporter 1 Company Name Freedom Cartage, Inc		U.S. EPA ID Number NJ0004125154		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address Lighting Resources, LLC 496 Park 800 Drive Greenwood, IN 46143-1554		Facility's Phone: 317-865-3659		U.S. EPA ID Number IND0000751327		
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 Wt/Vol.	13. Waste Codes
	1.	HA3077. PG HAZARDOUS WASTE Solid, N.O.S., 9, 60% Mercury Crushed Glass	10 6190	6190	P	002
	2.					
	3.					
	4.					
14. Special Handling Instructions and Additional Information						
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 on behalf of GEEF Janice Short		Signature Janice Short		Month Day Year 3 27 13		
INT'L	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.:			
	Transporter signature (for exports only):					
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials					
	Transporter 1 Printed/Typed Name STEVEN T. GILSON		Signature Steven T. Gilson		Month Day Year 3 25 13	
Transporter 2 Printed/Typed Name		Signature		Month Day Year		
SIGNATURE 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					
	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 Francisco Vasquez		Signature Francisco Vasquez		Month Day Year 3 27 13		

24 hour rule and therefore, LR was not in violation of the 24 hour Hazardous Waste Rule in the Permit.

Training:

Training records were reviewed for Heath Clark, Aaron Chappell, Anthony McDonald, Jim Miller, Roderick Richardson and Bonnie Bishop-Clark. Permit condition requires that employees should have received either a 24 or 40 hours OSHA HAZWOPER. The inspection team reviewing training documentation found it was difficult to determine if employees had received the required training. According to Ms. Bishop-Clark, employees watch video tapes to fulfill the 24/40 HAZWOPER requirement; however, documentation indicated employees completed the training in two days.

LR is in apparent violation of Permit Condition-Part II (A)(3)- Specific Operating Conditions. This permit condition requires the facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part, as required in F.S.403. 727(J)(c)(40 C.F.R. § 264.16(a)(I).

Lighting Resources purchased an approved 40-hour Hazwoper Training Program that includes 18 CDs with corresponding Test Materials for each CD. Each employee was supervised and completed the materials. Some training was continuous days and some was dispersed over two or three months. There is some confusion as the signatures and dates represent the completion date, rather than the start and ending dates. We have changed the supporting forms to show starting and ending times and dates to illustrate the actual time involved in completing all 18 modules.

The Table below shows the requirements by individual and also their completed training dates. This indicates that Lighting Resources was not in violation of Permit Condition-Part II (A)(3)- Specific Operating Conditions. This permit condition requires the facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part, as required in F.S.403. 727(J)(c)(40 C.F.R. § 264.16(a)(I).

Lighting Resources, LLC Training Table

Required Class based on title

Dates are completion dates

Permit	6-Jul-12
Processing	12-Jul-12

Lighting Resources, LLC.

RCRA CEI

April 24, 2013

Page 10

Individual	Title	Start Date	40 Hr HAZWOPER	Universal Waste Handler Training	Advanced RCRA Training	Advanced US DOT HAZMAT
Requirements by Title						
Heath Clark	Operations Mgr		x	x	x	x
Aaron Chappell	Processing		x	x		x
Anthony McDonald	Shipping Supervisor		x	x		x
Jim Miller	Shift Supervisor		x	x		x
Roderick Richardson	Processing		x	x		x
Bonnie Bishop-Clark	Facility manager		x	x	x	x
Full Course Scheduled						
Heath Clark	Operations Mgr		May-12	***	****	10/6/2011
Aaron Chappell	Processing	1/28/2013	93%	1/28/2013	1/28/2013	x
Anthony McDonald	Shipping Supervisor		7/5/2012	5/23/2012	5/23/2012	10/6/2011
Jim Miller	Shift Supervisor	5/18/2012	7/5/2012	5/23/2012	5/23/2012	10/6/2011
Roderick Richardson	Processing	2/5/2013	93%	2/5/2013	2/5/2013	
Bonnie Bishop-Clark	Facility manager		May-12	***	****	10/6/2011
Full Course - scheduled						
Heath Clark	Operations Mgr		5/24/2013	5/6/2013	5/6/2013	*
Aaron Chappell	Processing		5/24/2013	5/16/2013	5/16/2013	*
Anthony McDonald	Shipping Supervisor	T 6/2013				
Jim Miller	Shift Supervisor		5/16/2013	5/16/2013	5/24/2013	*
Roderick Richardson	Processing	T 7/2013	5/24/2013	5/16/2013	5/16/2013	
Bonnie Bishop-Clark	Facility manager		5/16/2013	5/6/2013	5/6/2013	*

*DOT Scheduled 10/11/2013

** 40 Hour Hazwoper trained upon receipt of manuals for review for supervisors

*** Universal Waste Trainer prior location

**** RCRA Trainer prior location

In addition, the inspection team noticed that Mr. Anthony McDonald, Warehouse Foreman, had not received RCRA training since July 2011 and no training documentation was available for Jason Sims, who was listed as the third person in contingency plan as an emergency contact. In addition, the position descriptions were missing the type and frequency of training.

LR is in apparent violation of Permit Condition-Part II (A)(3)-Specific Operating Conditions. This permit condition requires the facility personnel to take part in an annual review of hazardous waste management training, as specified in 40 C.F.R. § 265.J 6(c). Specifically, LR had not provided annual training for Mr. Anthony McDonald or Jason Sims.

Anthony McDonald received RCRA training on 5-3-2012 upon his return to LR. Exhibit #15 a,b. Jason Sims documentation of training is attached (Exhibit #16 a,b) showing 40-Hour Hazwoper completed on 7-2-2012. He was terminated in August 4, 2012 and the Contingency Plan should have been updated at that time. The Contingency Plan was updated May 2013 (Exhibit #17 a,b,c,) and again in July 2013 (Exhibit #18 a,b,c) and forwarded to all concerned parties. Therefore, both Anthony McDonald and Jason Sims did *take part in an annual review of hazardous waste management training, as specified in 40 C.F.R. § 265.16(c).* and LR was not in violation.

LR is in apparent violation of F.S. 403.727(J)(a)(40 C.F.R. § 265.16(c)). This regulation requires that a written job description for each position listed under paragraph (d)(1) of this section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of employees assigned to each position as well as the amount of both introductory and continuing training that will be given to each person filling a position.

The Facility Personnel Requirement and Training in Section 3.4 itemizes the Title and Job Description, as well as, introductory and continuing training that will be given to each person filling a position (Table 3-1 and Table 3-2.) Exhibit 19 and Exhibit 20.

In the LR Permit Table 3-2 shows all Position Titles and lists Title Specific Training that is required. Following the table is the rule regarding the refresher course required to maintain eligibility for the 24 or 40 hour Hazwoper annual renewal. The 8-hour Hazwoper Refresher Course meets the requirements outlined in OSHA 29 CFR 1910.120 for 8 (eight) hours of annual refresher training for workers at hazardous waste sites that have completed either an initial 24 or 40 Hazwoper Training.

Also noted above is that "the position descriptions were missing the type and frequency of training". The position descriptions are listed in Table 3-2 and the training type and frequency is listed in Table 3-2. In addition, attached as Exhibit 21 is the Chart showing the job title for each Facility position and the name of the employee filling each position.

Weekly inspections:

LR started conducting and login weekly inspections in October 2012. The inspection team noticed that the weekly inspection records were done using a word processor and



LIGHTING RESOURCES, LLC
OCALA, FLORIDA

RECORD OF FACILITY PERSONNEL TRAINING

Training Date	Training Provider	Training Topic
5-23-12	B. Bishop	Universal Waste
5-23-12	B. Bishop	Right-to-know-Mercury
5-23-12	B. Bishop	RCRA
6-13-12	HC Clark	Safety Orientation
6-16-12	HC Clark	Site Safety & Health Plan
6-16-12	HC Clark	Understanding Hazwoper
6-29-12	B. Bishop	Handling Hazardous Materials
6-29-12	B. Bishop	Understanding Chemical Hazards
6-16-12	HC Clark	ANSI Material Safety Data Sheets
6-14-12	HC Clark	Hazmat Labeling
6-18-12	HC Clark	Emergency Response Plan
7-2-12	B. Bishop	Monitoring Procedures
7-4-12	B. Bishop	Accidental Release & Spill Clean-Up
7-2-12	B. Bishop	Personal Protective Equipment
7-2-12	B. Bishop	Respiratory Protection
7-4-12	B. Bishop	Decontamination Procedures
7-4-12	B. Bishop	Dealing With The Media
7-2-12	B. Bishop	Medical Surveillance

Name (Printed): Anthony McDonald

Signature: Anthony M. McDonald

Date: 7-5-12 Time: 2:35



LIGHTING RESOURCES, LLC
OCALA, FLORIDA

RECORD OF FACILITY PERSONNEL TRAINING

Training Date	Training Provider	Training Topic
7-2-12	B. Bishop	Work Practices & Engineering
7-4-12	B. Bishop	Electrical Safety
6-28-12	B. Bishop	Fire Prevention
6-14-12	HC Clark	Heat Stress
6-18-12	HC Clark	Confined Spaces
		*Forklift Workshop
		**Drivers (In addition)
5-23-12	B. Bishop	CSA - Safety & Compliance
5-23-12	B. Bishop	Hours of Service

Name (Printed): Anthony McDonald

Signature: _____

Date: 7-5-12 Time: 2:35



LIGHTING RESOURCES, LLC
OCALA, FLORIDA

RECORD OF FACILITY PERSONNEL TRAINING

Training Date	Training Provider	Training Topic
7-11-11	BBC	Right-To-Know - Mercury
7-11-11	BBC	RCRA
7-11-11	BBC	Universal Waste
6-28-12	BBC	Safety Orientation
6-28-12	BBC	Site Safety & Health Plan
6-28-12	BBC	Understanding Hazwoper
7-2-12	BBC	Medical Surveillance
6-28-12	BBC	ANSI Material Safety Data Sheets
7-2-12	BBC	Personal Protective Equipment
6-28-12	BBC	Heat Stress
6-28-12	BBC	Emergency Response Plan
5-14-12	BBC	Accidental Release & Spill Cleanup
7-2-12	BBC	Respiratory Protection
5-14-12	BBC	Decontamination Procedures
5-14-12	BBC	Dealing with the Media
7-2-12	BBC	Monitoring Procedures
6-28-12	BBC	Handling Hazardous Materials
6-28-12	BBC	Understanding Chemical Hazards

Name (Printed): Jason Sims

Signature: Jason Sims

Date: 9-10-12 Time: 2:00 pm

Exhibit # 166



LIGHTING RESOURCES, LLC
OCALA, FLORIDA

RECORD OF FACILITY PERSONNEL TRAINING

Training Date	Training Provider	Training Topic
6-28-12	BBC	Hazmat Labeling
6-28-12	BBC	Fire Prevention
5-14-12	BBC	Electrical Safety
7-2-12	BBC	Work Practices & Engineering
5-14-12	BBC	Confined Spaces
	BBC	
		*Drivers (In addition):
		CSA - Drivers - Safety & Compliance
		Hours of Service
10-6-11	Clark Environmental	DOT Hazmat Training
		*Warehouse (In addition):
11-7-11	BBC	Forklift Workshop

Name (Printed):

Jason Sims

Signature:

Jason Sims

Date:

9-10-12

Time:

2:00 PM



LIGHTING RESOURCES, LLC

1007 SW 16th Lane
Ocala, FL 34471
(352) 509-3001 • Fax (352) 509-3012
(855) 502-3001

Exhibit # 17a



July 15, 2013

Florida Department of Environmental Protection
Division of Waste Management
Anthony Tripp
Bheem Kothur
2600 Blair Stone Road
Tallahassee, Florida 32399

Reference: Letter of Notification
Contingency Plan – Company Emergency Coordinators

Mr. Tripp and Mr. Kothur,

This letter of notification is to inform FDEP of changes in the Lighting Resources personnel listed as emergency coordinators in the contingency plan for Lighting Resources LLC, EPA ID# FLR 000 070 565, Operating Permit # 0309339-HO-001.

If you have any questions, please do not hesitate to contact me.

Respectfully,

Bonnie Bishop-Clark
Lighting Resources LLC
1007 SW 16th Lane, Ocala, FL 34471
352-509-3001

EMERGENCY CONTACT LIST

Emergency Coordinator: (Change)

Name: Jason Muhlenkamp (Operations Manager)
Office Phone: 352-509-3001
Cell Phone: 352-789-4009
Address: 1007 SW 16th Lane, Ocala, FL. 34471

Alternate Emergency Coordinator #1: (Change)

Name: Jamie Shortt (Service Manager)
Cell Phone: 352-789-1424
Work Phone: 352-509-3001
Address: 6592 River Road, Dunnellon, FL. 34431

Alternate Emergency Coordinator #2: (Change)

Name: Bonnie Bishop-Clark (Facility Manager)
Cell Phone: 904-881-2229
Work Phone: 352-509-3001
Address: 3101 SW 34th Ave. #905, Ocala, FL 34474

Exhibit #17c

Cc:

Janine Kraemer
Florida Department of Environmental Protection
Hazardous and Solid Waste Program
3319 Maguire Blvd., Suite 232
Orlando, FL 32803

John Newell
Marion County Solid Waste
5601 SE 66th Street
Ocala, FL 34480

Susan Richard
Lighting Resources LLC
805 E. Francis Street
Ontario, CA 91761



LIGHTING RESOURCES, LLC

1007 SW 16th Lane
Ocala, FL 34471
(352) 509-3001 • Fax (352) 509-3012
(855) 502-3001

Exhibit # 18a



Florida Department of Environmental Protection
Division of Waste Management
Anthony Tripp
Bheem Kothur
2600 Blair Stone Road
Tallahassee, Florida 32399

*Invalid
As of 7-5-13*

Reference: Letter of Notification
Contingency Plan – Company Emergency Coordinators

Mr. Tripp and Mr. Kothur,

This letter of notification is to inform FDEP of changes in the Lighting Resources personnel listed as emergency coordinators in the contingency plan for Lighting Resources LLC, EPA ID# FLR 000 070 565, Operating Permit # 0309339-HO-001.

If you have any questions, please do not hesitate to contact me.

Respectfully,

Bonnie Bishop-Clark

Bonnie Bishop-Clark
Lighting Resources LLC
1007 SW 16th Lane, Ocala, FL 34471
352-509-3001

EMERGENCY CONTACT LIST

Emergency Coordinator: (No Change)

Name: Bonnie Bishop-Clark (Facility Manager)
Office Phone: 352-509-3001
Cell Phone: 866-961-9100
Address: 3101 SW 34th Ave. #905, Ocala, FL 34474

Alternate Emergency Coordinator #1: (Change)

Name: Anthony McDonald (Operations Manager)
Cell Phone: 352-502-1196
Work Phone: 352-509-3001
Address: 1360 NE 175th Street, Citra, FL 32113

Alternate Emergency Coordinator #2: (Change)

Name: Jamie Shortt (Service Manager)
Cell Phone: 352-789-1424
Work Phone: 352-509-3001
Address: 6592 River Road, Dunnellon, FL 34431

Cc:

Janine Kraemer
Florida Department of Environmental Protection
Hazardous and Solid Waste Program
3319 Maguire Blvd., Suite 232
Orlando, FL. 32803

John Newell
Marion County Solid Waste
5601 SE 66th Street
Ocala, FL. 34480

Susan Richard
Lighting Resources LLC
805 E. Francis Street
Ontario, CA. 91761

Table 3-1 Lighting Resources, LLC - Mercury Recovery Facility, Ocala, FL Initial New Employee Training	
Position Title (#)	Required Training
Part I – New Employee Orientation:	
ALL Staff	<ul style="list-style-type: none"> ▪ Corporate safety policies and procedures ▪ Site control and works zones ▪ Hazardous chemical and waste management ▪ Pre-placement physical requirements ▪ Work group indoctrination ▪ Plant tour: process and safety equipment ▪ OSHA hazard communication standard ▪ Production tasks orientation ▪ Environmental and waste control ▪ Work group rotation ▪ Laboratory tasks orientation ▪ Security tasks orientation ▪ Maintenance tasks orientation ▪ Transportation tasks orientation ▪ Material handling tasks orientation
Part II – Title Specific Training:	
Facility Manager (1)	<ul style="list-style-type: none"> ▪ 40-Hour HAZWOPER Training ▪ Universal Waste Handler Training ▪ Advanced RCRA Training ▪ Advanced U.S. DOT Hazardous Materials Training ▪ Courses 2 and 3 (see next page)
Operations Manager (1)	<ul style="list-style-type: none"> ▪ 40-Hour HAZWOPER Training ▪ Universal Waste Handler Training ▪ Advanced RCRA Training ▪ Advanced U.S. DOT Hazardous Materials Training ▪ Courses 2 and 3 (see next page)
Shift Supervisor (1)	<ul style="list-style-type: none"> ▪ 40-Hour HAZWOPER Training ▪ Universal Waste Handler Training ▪ Advanced U.S. DOT Hazardous Materials Training ▪ Courses 2 and 3 (see next page)
Shipping Supervisor (1)	<ul style="list-style-type: none"> ▪ 40-Hour HAZWOPER Training ▪ Universal Waste Handler Training ▪ Advanced U.S. DOT Hazardous Materials Training ▪ Courses 2 and 3 (see next page)
Customer Service and Transport Manager (1)	<ul style="list-style-type: none"> ▪ 24-Hour HAZWOPER Training ▪ Universal Waste Handler Training ▪ Advanced U.S. DOT Hazardous Materials Training ▪ Courses 2 and 3 (see next page)
Driver -CDL Class "A" (4)	<ul style="list-style-type: none"> ▪ 24-Hour HAZWOPER Training ▪ Universal Waste Handler Training ▪ Advanced U.S. DOT Hazardous Materials Training ▪ Courses 2 and 3 (see next page)
MCL / Lamp Processing Operators (2)	<ul style="list-style-type: none"> ▪ 40-Hour HAZWOPER Training ▪ Universal Waste Handler Training ▪ Advanced U.S. DOT Hazardous Materials Training ▪ Courses 2 and 3 (see next page)
Note: all personnel will receive training on the appropriate use and types of personal protective equipment to be used at the Facility. Further, all personnel will be fit tested for respirator equipment.	



Subsequent to receiving training, the new employees will be closely supervised during the first few months of working in the Facility (by experienced and senior employees) to ensure they understand all proper procedures and protocol.

A detailed worker health and safety plan has been prepared and is presented in **Section 5** of this Report (*Worker Health and Safety Plan*). A summary of the Facility staff positions, job descriptions / responsibilities, reporting supervisors, and position requirements is presented below in **Table 3-2**.

Table 3-2 Lighting Resources, LLC - Mercury Recovery Facility, Ocala, FL Facility Staffing Summary			
Position Title (#)	Job Description / Responsibilities	Supervisor	Requirements
Facility Manager (1)	Responsible for maintaining Facility operations in accordance with the Operating Plan. Supervises overall Facility operations including worker health and safety, regulatory compliance, environmental controls, and personnel training.	Reports to Company President	College degree or equivalent work experience
Operations Manager (1)	Responsible for operational compliance with all applicable regulations / requirements, Facility maintenance, schedules, and general recordkeeping.	Reports to Facility Manager	College degree or equivalent work experience
Shift Supervisor (1)	Oversees receiving and shipping, production, equipment maintenance, housekeeping, plant safety and employee training.	Reports to Operations Manager	Min. H.S. degree and 1-year process experience at Lighting Resources Facility
Shipping Supervisor (1)	Directly supervises all unloading and inventory of incoming materials and loading of all outbound material.	Reports to Shift Supervisor / Operations Manager	Min. H.S. diploma and 6-months process experience at Lighting Resources Facility
Customer Service and Transport Manager (1)	Directly supervises all assigned facility drivers and is responsible for customer pickup / delivery services; driver USDOT compliance and training; truck / trailer maintenance / permitting; and scheduling of incoming / outgoing freight.	Reports directly to Facility Manager	Min. 2-years college or equivalent work experience and a min. 5 years of supervisory experience in related service industry
Driver -CDL Class "A" (4)	Performs over the road transportation; loading/unloading of materials using various equipment (e.g., forklift, dolly, etc.); maintains vehicle and vehicle safety checks; prepares bills of lading, manifests, logbook, trip reports; and sealing/ repacking of containers for material transport to meet DOT regulations.	Reports to Customer Service and Transport Manager	Min. H.S. diploma or equivalent and min. 2-year successful, accident/incident-free commercial driving experience
Mercury Recovery Process Operator (2)	Performs production component separation of MCLs using the Balcan MP8000 equipment; performs maintenance on process equipment; unloads materials from trucks and containers as they arrive, sorts / stages materials according to category and size; and seals and replaces containers for transport.	Reports to Operations Manager / Shift Supervisor	Possesses manual dexterity, properly uses PPE, and ability to work with minimum supervision.



Lighting Resources
Florida Facility
Employee and Position Title

			HW Position
Bonnie	Bishop-Clark	Facility Manager	x
Anthony	McDonald	Shift Supervisor	x
Heath	Clark	Operations Manager	x
Jamie	Shortt	Transport Manager	x
Rueben	Anderson	Shift Supervisor	x
Aaron	Chappell	Processor	x
Willie	Barner	Processor	x
Brent	Palmertree	Shift Supervisor	x
Elvy	McCranie	Processor	x
Carlos	Negros	Driver	x
Luis	Narvarro	Driver	x
Jim	Miller	Shift Supervisor	x
Rosemarie	Knox	Shipping Supervisor	x
Kevin	Brewster	Processor	x
Judie	DeLutis	Office - Non-hazardous	n/a
Antonio	Speed	Processor PT	x
Ryan	Cartier	Processor PT	x
Rod	Richardson	Processor	x
Terry	Sutton	Consultant	n/a

24 and 40-Hazwoper		Within 6 months of hire
Mercury Right to Know		At hire
Worker's right to Know		Within 6 months of hire
Universal Waste Training		At hire
RCRA		At hire
DOT Training	CFR 172.704	Within 6 months of hire
	CFR 172.704 C2	Every three years thereafter.

that several weekly logs had future dates, times and already completed. In addition, the inspections did not have the signature of the inspector.

LR is in apparent violation of F.S. 403.727(1)(e). This regulation states that it is unlawful for any hazardous waste generator, transporter, or facility owner or operator to knowingly make any false statement, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to the provisions of this act.

LR is in apparent violation of 40 C.F.R. § 265.JS(d). This regulation requires owners and operators must record inspections in an inspection log or summary. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions

The FL Dep provided the word document that we were using at the time of the audit for the Weekly HW Drum Inspection. LR was using it on the computer and instead of signing were typing the name, date, and selecting yes or no. See Exhibit #22. The form had been copied from one to the next and so the bottom of the form had information that should have been cleared. Our intent was never to complete without a complete inspection. This was strictly a word processing error and LR never knowingly would make any false statement, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to the provisions of this act. To correct the possibility of any errors in the future, LR changed immediately to a form that is handwritten by the Inspector at the time of the inspection. Exhibit #23

Also noted above is that “ LR is in apparent violation of 40 C.F.R. § 265.JS(d). This regulation requires owners and operators must record inspections in an inspection log or summary. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions” The form being used from FL DEP met all these requirements and was completed properly.

Contingency Plan:

Exhibit # 22

WEEKLY INSPECTION LOG

Inspector: Bonnie Bishop-Clark
Clearly Print Name

Date: Friday 4.5.13

Time: 4:40 PM

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

Are all containers in good condition?	<u>Yes</u>	No
Is there any evidence of leaks or spills?	Yes	<u>No</u>
Are all containers labeled "Hazardous Waste"?	<u>Yes</u>	No
Are all containers marked with an accumulation start date?	<u>Yes</u>	No
Are all containers closed?	<u>Yes</u>	No
Is there adequate aisle space between rows of drums?	<u>Yes</u>	No
Is spill control equipment available?	<u>Yes</u>	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 04.12.13

Time: 4:30 PM

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

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

Observations: _____

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

Repairs or Remedial Action

Date

Exhibit #23

WEEKLY INSPECTION LOG

Inspector: Bonnie Bishop Clark Date: 4-19-13 Time: 4:40 PM
Clearly Print Name

Accumulation Area Inspected: Calcium Phosphate Powder Number of Containers: 1

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

Observations: _____

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

<u>Repairs or Remedial Action</u>	<u>Date</u>
_____	_____
_____	_____

Inspector: Bonnie Bishop Clark Date: 4-26-13 Time: 4:30 PM
Clearly Print Name

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

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

Observations: Label re-taped on one drum

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

<u>Repairs or Remedial Action</u>	<u>Date</u>
_____	_____
_____	_____

The contingency plan (4/12) listed a former employee as the third emergency contact. An updated contingency plan needs to list a current employee and a copy of this updated contingency plan needs to be sent to the local authorities.

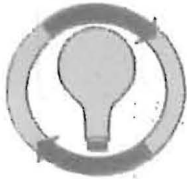
LR has failed to adhere to a condition for exemption from RCRA § 3005 given in F.S. 403.727(1)(c)[40 C.F.R. § 265.52(d)], as incorporated by 40 C.F.R. § 262.34(a)(4). This regulation requires the facility to list (in the contingency plan) the names, addresses and phone numbers of emergency coordinators. As such, the facility is in apparent violation of RCRA § 3005.

Jason Sims was terminated in August 4, 2012 and the Contingency Plan should have been updated at that time. The Contingency Plan was updated May 2013 and was updated again in July 2013 and forwarded to all concerned parties. Exhibit #24 a,b,c and Exhibit #25 a,b,c.

Sampling:

The 12 month rolling average on mercury levels in the crushed glass were in compliance. Although the permit requires samples be taken for testing after three consecutive days of operation, RCRA Permitting in Tallahassee has allowed LR to sample twice a week. LR is in the process of modifying the permit to reflect this change in sampling.

Attachment 1 - Photo Log



LIGHTING RESOURCES, LLC

1007 SW 16th Lane
Ocala, FL 34471
(352) 509-3001 • Fax (352) 509-3012
(855) 502-3001

Exhibit # 24a



July 15, 2013

Florida Department of Environmental Protection
Division of Waste Management
Anthony Tripp
Bheem Kothur
2600 Blair Stone Road
Tallahassee, Florida 32399

Reference: Letter of Notification
Contingency Plan – Company Emergency Coordinators

Mr. Tripp and Mr. Kothur,

This letter of notification is to inform FDEP of changes in the Lighting Resources personnel listed as emergency coordinators in the contingency plan for Lighting Resources LLC, EPA ID# FLR 000 070 565, Operating Permit # 0309339-HO-001.

If you have any questions, please do not hesitate to contact me.

Respectfully,

Bonnie Bishop-Clark
Lighting Resources LLC
1007 SW 16th Lane, Ocala, FL 34471
352-509-3001

Exhibit # 24b

EMERGENCY CONTACT LIST

Emergency Coordinator: (Change)

Name: Jason Muhlenkamp (Operations Manager)
Office Phone: 352-509-3001
Cell Phone: 352-789-4009
Address: 1007 SW 16th Lane, Ocala, FL 34471

Alternate Emergency Coordinator #1: (Change)

Name: Jamie Shortt (Service Manager)
Cell Phone: 352-789-1424
Work Phone: 352-509-3001
Address: 6592 River Road, Dunnellon, FL 34431

Alternate Emergency Coordinator #2: (Change)

Name: Bonnie Bishop-Clark (Facility Manager)
Cell Phone: 904-881-2229
Work Phone: 352-509-3001
Address: 3101 SW 34th Ave. #905, Ocala, FL 34474

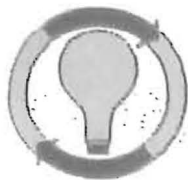
Exhibit # 24c

Cc:

Janine Kraemer
Florida Department of Environmental Protection
Hazardous and Solid Waste Program
3319 Maguire Blvd., Suite 232
Orlando, FL 32803

John Newell
Marion County Solid Waste
5601 SE 66th Street
Ocala, FL 34480

Susan Richard
Lighting Resources LLC
805 E. Francis Street
Ontario, CA 91761



LIGHTING RESOURCES, LLC

1007 SW 16th Lane
Ocala, FL 34471
(352) 509-3001 • Fax (352) 509-3012
(855) 502-3001

Exhibit # 25a



Florida Department of Environmental Protection
Division of Waste Management
Anthony Tripp
Bheem Kothur
2600 Blair Stone Road
Tallahassee, Florida 32399

*Invalid
AS of 1-5-13*

Reference: Letter of Notification
Contingency Plan – Company Emergency Coordinators

Mr. Tripp and Mr. Kothur,

This letter of notification is to inform FDEP of changes in the Lighting Resources personnel listed as emergency coordinators in the contingency plan for Lighting Resources LLC, EPA ID# FLR 000 070 565, Operating Permit # 0309339-HO-001.

If you have any questions, please do not hesitate to contact me.

Respectfully,

Bonnie Bishop-Clark

Bonnie Bishop-Clark
Lighting Resources LLC
1007 SW 16th Lane, Ocala, FL 34471
352-509-3001

EMERGENCY CONTACT LIST

Emergency Coordinator: (No Change)

Name: Bonnie Bishop-Clark (Facility Manager)
Office Phone: 352-509-3001
Cell Phone: 866-961-9100
Address: 3101 SW 34th Ave. #905, Ocala, FL 34474

Alternate Emergency Coordinator #1: (Change)

Name: Anthony McDonald (Operations Manager)
Cell Phone: 352-502-1196
Work Phone: 352-509-3001
Address: 1360 NE 175th Street, Citra, FL 32113

Alternate Emergency Coordinator #2: (Change)

Name: Jamie Shortt (Service Manager)
Cell Phone: 352-789-1424
Work Phone: 352-509-3001
Address: 6592 River Road, Dunnellon, FL 34431

Exhibit # 25c

Cc:

Janine Kraemer
Florida Department of Environmental Protection
Hazardous and Solid Waste Program
3319 Maguire Blvd., Suite 232
Orlando, FL 32803

John Newell
Marion County Solid Waste
5601 SE 66th Street
Ocala, FL 34480

Susan Richard
Lighting Resources LLC
805 E. Francis Street
Ontario, CA 91761



Figure 1-Box of broken bulbs from repackaging labor

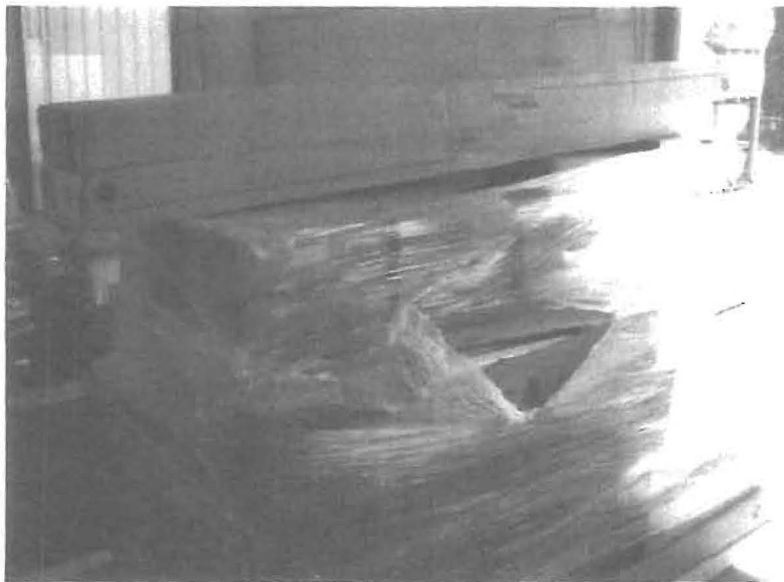


Figure 2 - Unlabeled lamp boxes



Figure 3 - Unlabeled lamp boxes

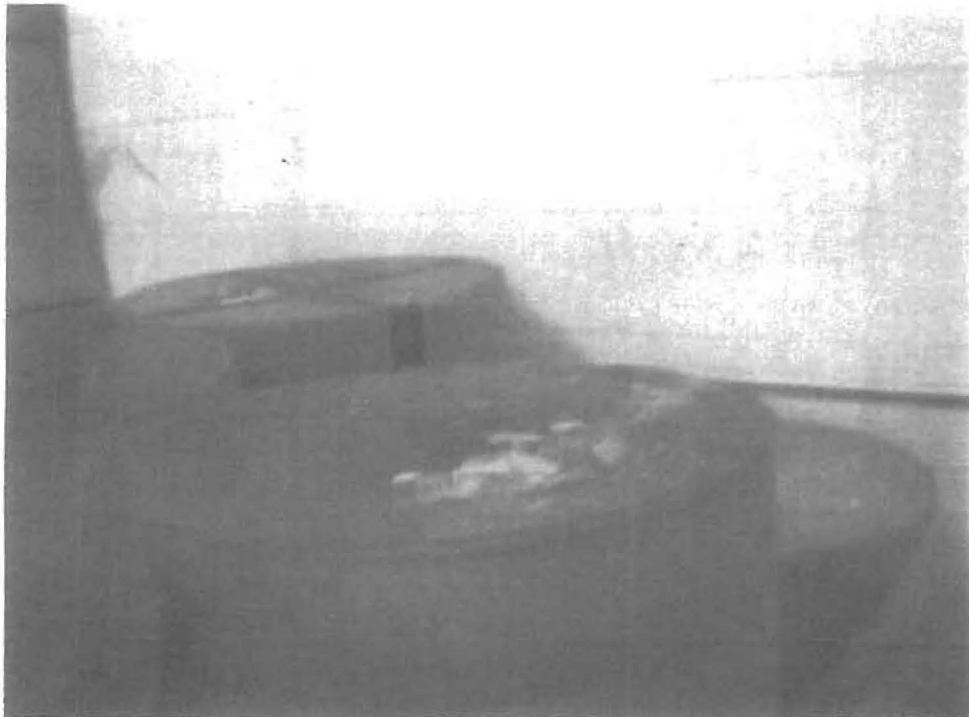


Figure 4 - Photo showing broken lamps on top of container



Figure 5-Photo showing plastic cover



Figure 6 -Drums storing universal waste batteries



Figure 7 - Unlabeled container storing UW Batteries



Figure 8 - Unlabeled container storing UW Batteries

Exhibit #8b

Print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number	
				JJK		
5. Generator's Name and Mailing Address			Generator's Site Address (if different than mailing address)			
Generator's Phone:						
6. Transporter 1 Company Name				U.S. EPA ID Number		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address				U.S. EPA ID Number		
Facility's Phone:						
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 Wt./Vol.	13. Waste Codes
		No.	Type			
1.						
2.						
3.						
4.						
14. Special Handling Instructions and Additional Information						
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		Signature		Month	Day	Year
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		Signature		Month	Day	Year
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