

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



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

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, <u>susan.richard@lightingresourcesinc.com</u>, or myself, 352-509-3001, <u>bonnie.bishop-clark@lightingresourcesinc.com</u>.

Sincerely, Donnie Bishop Clark

Bonnie Bishop-Clark Southeast Branch Manager Lighting Resources LLC 1007 SW 16<sup>th</sup> 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

805 E. Francis Street Ontario, California 91761 (909) 923-7252 1522 E. Victory Street, Suite #4 Phoenix, Arizona 85040 (602) 276-4278 498 Park 800 Drive Greenwood, Indiana 46143 (317) 888-3889 101 E Bowie St. Fort Worth TX 76110 (817) 921-1440



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 4 ATLANTA FEDERAL CENTER 61 FORSYTH STREET ATLANTA, GEORGIA 30303-8960

SEP 2 0 2010

<u>CERTIFIED</u> <u>MAIL</u> 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.

erth. Chief

erth, 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 McDonaldLightingResources,LLCTerry SuttonLighting Resources,LLCJanine KramerFDEPHector M. DanoisU.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.

 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.
- 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



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Training Session for 9/25/13

Exhibit #1

Subject: Procedures for Handling Product in the warehouse.

- 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.
- Housekeeping. If there is broken glass/lamps, it must be cleaned in a proper and swift manner.
- 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 Date Sign Chappell 10/10/13 Angon 10/10/13 79025 Crillia. YSOMASY DILLT. eillen Mar Er-SON -10-1'5 Cuben O Supp-AS1 P.FI 0 pason Mil Trainers Signature

805 E. Francis Street Ontario, California 91761 (909) 923-7252 1522 E. Victory Street, Suite #4 Phoenix, Arizona 85040 (602) 276-4278 498 Park 800 Drive Greenwood, Indiana 46143 (317) 888-3889 101 E Bowie St. Fort Worth TX 76110 (817) 921-1440 Several boxes of projection lamps where 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 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) - Standardsfor 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)(l) (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 require 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 lion-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 are 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 orpackage 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)."

- (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.
- (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 <u>storage</u> 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..

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

Lighting Resources, LLC Phosphor Powder Table 1

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 #	Туре	Weight	Pull Date		Out Date	Via	Freehold Maifest #
41	010473507JJK	Powder	406	10/5/2012		11/1/2012	Freehold	M137045
42	010473507JJK	Powder	495	10/8/2012		11/1/2012	Freehold	M137045
43	010473507JJK	Powder	443	10/12/2012		11/1/2012	Freehold	M137045
44	010473507JJK	Powder	563	10/14/2012		11/1/2012	Freehold	M137045
45	010473507JJK	Powder	370	10/9/2012		11/1/2012	Freehold	M137045
46	010473507JJK	Powder	440	10/15/2012		11/1/2012	Freehold	M137045
47	010473507JJK	Powder	382	10/18/2012		11/1/2012	Freehold	M137045
48	010473507JJK	Powder	412	10/18/2012		11/1/2012	Freehold	M137045
49	010473507JJK	Powder	339	10/19/2012		11/1/2012	Freehold	M137045
50	010473507JJK	Powder	538	10/24/2012		11/1/2012	Freehold	M137045
51	010473507JJK	Powder	464	10/23/2012		11/1/2012	Freehold	M137045
52	010473507JJK	Powder	462	10/25/2012		11/1/2012	Freehold	M137045
53	010473507JJK	Powder	471	10/26/2012		11/1/2012	Freehold	M137045
54	010473507JJK	Powder	460	10/29/2012		11/1/2012	Freehold	M137045
55	010473507JJK	Powder	289	11/1/2012	Balcon	11/1/2012	Freehold	M137045
56	010473507JJK	Powder	359	11/1/2012	Ballen	11/1/2012	Freehold	M137045
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Ewhibit # 2a

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. Transporter 2 Company Name						U.S. EPA ID	Number		
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# Calcium Phosphate Powder

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

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1		ORM HAZARDOUS	1. Generator ID Number FLR00007056	6	2. Page 1 of		cy Response 5-3924-C		4. Manifest		351	0.1	JK
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1				Sources, LLC				In amoren an	and a second				· · ·
1	í		Ocala, FL 3										
			9-3001-James Miller				1						-
	6. Tra	nsporter 1 Company Nam	e Lighting Resource	as LLC					U.S. EPAID I		FLR00007	70555	
1	7. Trai	nsporter 2 Company Nam		and a person of the second sec					U.S. EPA ID N		1 0 00001	CANNO	
			Freehold Cartage	, INC.					1		NJD05412	25164	
	8. Des	signated Facility Name an		Resources, LLC					U.S. EPA ID N				
	1	Jo Dhoney 317-868	498 Park Greenwo	600 Drive od, IN 46143 USA					1		W000035	1387	
		ysrinne.		ame, Hazard Class, ID Number,		1	10. Contair		1				
	9a. HM	and Packing Group (if a		alle, nazaru Gass, iD Number,			No.	Туре	11. Total Quantity	12. Unit Wt./Vol.	13.1	Waste Code	19
		1. RQ, Hazard	ous Waste, Solid, 9, 1	VA3077, PGIII, (Calcium F	Phosphate			DM		P	0009		1.
GENERATOR	•	Powden) ER	G 1/2				16		7051				
ENE			oue Waste Solid, N.O.	S., 9, NA3077, PGIII (N	vercury Debr	15	-	DF			0009		
ĩ		Filters)					3		72	P			-
	-	3. RO Hazardo	us Waste Solid 9 M	A3077 (Mercury Lamp /	ámpulas) EB	213				P	0009		
		172	an timetet officiel 21 in	and functions rough	aubmest cit		1	br.	53				
		a					1						
		4. RQ, Used M	lercury Containing Equ	lipment, 8, UN2809, PG	III ERG.#1	72	-	5 -		ρ	DODE		•
1							3	ΔF	76	r		•	
			s and Additional Information	v declare that the contents of this	consignment are	a fully and a	-	scribed above	by the proper shi	ipoino name	and are clas	silied. pack	aged.
	n E	narked and labeled/placar porter, I certify that the c	ded, and are in all respects in p ontents of this consignment co	roper condition for transport acco nform to the terms of the attached 40 CFR 262.27(a) (if I am a larg	ording to applicat d EPA Acknowled	ble internation	onal and nationsent.	onal governme	ental regulations.	If export shi	pment and I a	un the Prim	ary
P		ator's/Offeror's Printed/Typ			Signa				0		Mon	th Day	Year
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	18a. Di	screpancy Indication Space	ce Quantity	Птуре		R	esidue		Partial Reja	ection	Ć	Full Reje	ection
						Manifes	t Reference	Number:					1
E	18b, Alt	emate Facility (or Genera	itor) .						U.S. EPA ID N	umber			1.1
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E		s Phone: gnature of Alternate Facilit	y (or Generator)							1	Mor	nth Day	Year
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	1	1010					•						
	a carton	ignated Facility Owner or Typed Name	Operator: Certification of receip	ot of hazardous materials covered	d by the manifest Signat	and the second se	noted in Item	18a	1	1	Mon	th Day	Year
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EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

### **Calcium Phosphate Powder**

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Drum #	Manifest #	Туре	Weight	Pull Date		Out Date	Vla	Maifest #
73	010473511JJK	Powder	380	12/10/2012		1/10/2013	Freehold	M134798
74	010473511JJK	Powder	414	12/11/2012		1/10/2013	Freehold	M134798
75	010473511JJK	Powder	453	· 12/11/2012		1/10/2013	Freehold	M134798
76	010473511JJK	Powder	455	12/13/2012	• •	1/10/2013	Freehold	M134798
. 77	010473511JJK	Powder	563	12/13/2012	· · ·	1/10/2013	Freehold	M134798
78	010473511JJK	Powder	388	12/13/2012		1/10/2013	Freehold	M134798
79	010473511JJK	Powder	487	12/13/2012		1/10/2013	Freehold	M134798
80	010473511JJK	Powder	467	12/17/2012		1/10/2013	Freehold	M134798
81	010473511JJK	Powder	470	12/21/2012		1/10/2013	Freehold	M134798
82	010473511JJK	Powder	362	12/31/2012		1/10/2013	Freehold	M134798
83	010473511JJK	Powder	412	12/28/2012		1/10/2013	Freehold	M134798
84	010473511JJK	Powder	486	12/18/2012		1/10/2013	Freehold	M134798
85	010473511JJK	Powder .	438	1/2/2013	4	1/10/2013	Freehold	M134798
86	010473511JJK	Powder	484	1/4/2013		1/10/2013	Freehold	M134798
87	010473511JJK	Powder	386	1/5/2013		1/10/2013	Freehold	M134798
88	010473511JJK	Powder	505	1/2/2013		1/10/2013	Freehold	M134798
89	010473511JJK	Powder	434	1/9/2013		1/10/2013	Freehold	M134798
90	010473511JJK	Powder	.489	1/8/2013	And and a second se	1/10/2013	Freehold	M134798
92	010473511JJK	Powder	425	1/10/2013	All Division in which the rest of the local division in which the rest of the rest of the local division in which the rest of the rest of the local division in which the rest of the	1/10/2013	Freehold	M134798
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†	UNIFORM		1. Generator ID Nur	e (12-pitch) typewr nber	luct.)	2. Page 1 of	f 3. Emergen	cy Response		4. Manifest	Tracking Nu			
		or's Name and Mailin s Phone:				-	Generator's	Site Address	(if different the	an mailing addre				
		s Phone: rter 1 Company Nam								U.S. EPAID	Number			
	ar manopor		An India a	8 8 <sup>3</sup> 11						1				
	7. Transpor	rter 2 Company Nam	e							U.S. EPA ID	Number			
	8. Designa	ted Facility Name an	d Site Address	2 <sup>10</sup> 12						U.S. EPA ID	Number		-	
	Facility's P	hone:	ай. С							Î				
	va.			Shipping Name, Haza	ard Class, ID Numbe	r,		10. Contai	iners	11. Total	12. Unit	13. V	Vaste Code	s
		d Packing Group (if a	iny))					No.	Туре	Quantity	Wt./Vol.	TAR.1		7. 1
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4	18. Discrep	bancy												
	18a. Discre	pancy Indication Sp	ace 🗌 Quan	tīty	Туре			Residue		Partial Re	election	[	🗌 Full Rej	ection
-	18b. Altern	ate Facility (or Gener	ator)				Manif	est Referenc	e Number:	U.S. EPA ID	Number			
<b>IGNATED FACILITY</b>	Facility's Pl								_	1				
NATEC		ture of Alternate Faci										Mo	nth Da	y Year
SIG	19. Hazard	ous Waste Report M	anagement Method	Codes (i.e., codes for 2.	hazardous waste tra	eatment, dispos 3.	sal, and recycli	ng systems)		4.	_			
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	20. Designa Printed/Typ		r Operator: Certifical	tion of receipt of haza	rdous materials covi		nifest except a ignature	s noted in Ite	m 18a			Mor	th Day	Year
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DA	-APPA 070			are oneoiote								ATOR'S		

**GENERATOR'S INITIAL COPY** 

## **Calcium Phosphate Powder**

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

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Out of Sequenece Out of Sequenece

Freehold

Exhibit+# 5a

Exhibit#Sb

	ned for use on elite (12-pitch) type 1. Generator ID Number		2 Page 1 of	3. Emergency Response	Phone	4. Manifest		Approved	. OND NO.	2030-00
UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number		2 Page 1 of	3. Emergency Response		00	957	951	2 J.	IK
5. Generator's Name and Mailin	The second se		<u> </u>	Generator's Site Address				201	L U	JIC
Generator's Phone: SE CO 6. Transporter 1 Company Nam	Lightang Resources 1027 Six 16th Lan 1000ta 21 34471 2510 James	ê .	1	,		U.S. EPAID N	Number	V006413	E42)	
7. Transporter 2 Company Nam						U.S. EPA ID N		NURISA 13	ao 10-4	
8. Designated Facility Name an Facility's Phone: 317-398-	Lighting Resou 495 Part, 300 D Greatweau, Im	irexe	×	ν,		U.S. EPA ID N		anne -	, 1387	
9a. 9b. U.S. DOT Description HM and Packing Group (if a	on (Including Proper Shipping Name, Ha my))	azard Class, ID Number,	, ° •	10. Contain No.	ers Type	11. Total Quantity	12. Unit WL/Vol.	.13.	Waste Code	s .
	Maradous Waste, Sold 9 7 172	PGN Calsium	Prosphate.		UNI .	3408	空展	009		
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3. NA 3077 Ru Swaepings)	, Hazareous Wast, Sello, P	Gill Adercury Oeb	ds F1001	2	01/	168	£.	009		
x 4. NA 3077, Me	soure Contamated Devices	.9 . PGM			360		14	909	×	i an
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TRANSPORTER'S

Exhibit# 50 1MW 188055

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Exhibit#5d



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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.

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

Lighting Resources,	LLC	Mercury	Articles,	/Devices	Table 2
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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 Devi	ces / Elen	nental				
BoL #	Gen/Cust.	Туре	Weight	P/U Date	In Date	Out Date	Via	Freehold Maifest #
010473507JJK	LRL - Ocala	Mercury Devices	190		11/1/2012	11/1/2012	Freehold	M137045 x
010473507JJK	LRL - Ocala	Floor Debris	260		11/1/2012	11/1/2012	Freehold	M137045 x
			450					

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exhibit#60

Plea	se pri	int or type. (Form desig	ned for use on elite (12-pitch)	typewriter.)						Form	Approved. OMB No. 2050-0039
1	UNII W	FORM HAZARDOUS	1. Generator ID Number		2. Page 1 of	3. Emergene	cy Response	Phone	4. Manifest	Tracking Nu	3507 <b>JJK</b>
1	5. Ge	enerator's Name and Mailin	ng Address		1.4	Generator's	Site Address (	if different th	an mailing addre	(as	
		erator's Phone:							110 504 10	hlumhan	
	5.10	ansporter 1 Company Nan	ne						U.S. EPA ID	Number	
	7. Tr	ansporter 2 Company Nan	ne .						U.S. EPA ID	Number	
	8. De	esignated Facility Name ar	nd Site Address						U.S. EPA ID	Number	
	Facil	ity's Phone:									
	9a. HM	9b. U.S. DOT Descripti and Packing Group (if	ion (including Proper Shipping Nan any))	ne, Hazard Class, ID Number,		-	10. Contair No.	Type	11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes
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- GENE		2.									
	$\vdash$	3.									
	-	4.							н	$\left  - \right $	
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	15.	marked and labeled/placa Exporter, I certify that the	DR'S CERTIFICATION: I hereby o arded, and are in all respects in pro contents of this consignment confi nimization statement identified in 4	per condition for transport acc form to the terms of the attache	ording to applied EPA Acknow	icable internative view of (	ional and nati Consent.	onal governn	tental regulation		
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-		ransporter Acknowledgmei					Dale leavi	ng 0.a			
ORTR	Trans	sporter 1 Printed/Typed Na	ame		Sig	inature		4			Month Day Year
TRANSPORTER	Tran	sporter 2 Printed/Typed Na	ame		Sk	gnaturə					Month Day Year
1	-	Discrepancy									
	18a.	Discrepancy Indication Sp	vace 🔲 Quantity	Туре			Residue		Partial Re	ejection	Full Rejection
LITY	18b.	Alternate Facility (or Gene	rator)			Mante	est Reference	Number:	U.S. EPA ID	Number	
SIGNATED FACILITY		ity's Phone: Signature of Alternate Fac	litte /or Conceptor								Month Day Year
NATE	100.	olghattire of Alternate Fac	uny (or Generator)								
SIG	19. H 1.	lazardous Waste Report M	lanagement Method Codes (i.e., o	odes for hazardous waste trea	tment, dispose 3.	al, and recyclin	ng systems)		4.		
1			1			10. 4		40-			
	-	esignated Facility Owner o ed/Typed Name	or Operator: Certification of receipt	or nazardous materials covers	-	ifest except as mature	s noted in Iten	1188		4	Month Day Year
EPA	Form	8700-22 (Rev. 3-05)	Previous editions are obsolete						ESIGNAT	ED FAC	HITY TO GENERATOR

DESIGNATED FACILITY TO GENERATOR

		Mercury Devi	ces / Elen	nental	- Mictory				
·····								Freehold	
BoL#	Gen/Cust.	Туре	Weight	P/U Date	In Date	Out Date	Via	Malfest #	
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
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exhibit# 70

UNIFO		gned for us						and the second second second				n Approved.		_
	RM HAZARDOUS	1. General	tor ID Number			1	3. Emerge	ncy Response	Phone	4. Manifest			0	111/
	STE MANIFEST		FLR000070	3565		1		25-3924-0	And Person in case of the local division of	No. of Concession, name of	the second s	351	Uu	IJK
	rator's Name and Mallin		1007 SŴ Ocala, FL	Resources, L 16th Lane 1. 34471 US		. 1	Generator's	Site Address	(if different th	an mailing addre	88)			
	or's Phone: 352-50 porter 1 Company Nan		James Millei	Ĩ						U.S. EPAID	Number			
or manag	portar i company run		hting Resou	irces, LLC						1		FLR00007	0565	
7. Trans	porter 2 Company Nan			-			-			U.S. EPAID	Number			
			ehold Carta	ige, Inc.						I		NJD05412	5164	
8. Desig	nated Facility Name ar	nd Site Addr	ess						· · ·	U.S. EPAID	Vumber			
Facility's	Phone: 317-888	3-3689	498 P	ng Resource ark 800 Driv twood, IN 46	8					1.		11000035	1387	
9a. 1	9b. U.S. DOT Descripti	ion (includin	g Proper Shippir	ng Name, Hazard	Class, ID Number	r,	1	10. Contai	ners	11. Total	12. Unit			
HM	and Packing Group (if a	any))						No.	Туре	Quantity	Wt.Nol.	13.1	Vaste Co	des
. 11.	RQ, Hazard Powder) ER	ious Wa RG 172	ste, Solid, S	9, NA3077, P	Gill,(Calcium	Phosphate		16	DN	7051	P	0003		. 
2.	RQ. Hazard	ious Wa	ste Solid. N	05 9 NA	3077, PGIII (	Nercunr Del	hrts		DF		· · ·	10000		1.
	Filters)		and manual its	.m.m.1 m1 1m	and the and	fuctors are	Line	3		72	P			1_
								5		1-	1			
3.	RQ Hazardo	ous Wast	te, Solid, 9,	NA3077 (M	eroury Lamp	Ampules) E	RG				p	0009		1
	172							i	DE	53				
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4.	RQ, Used N	Aercury (	Containing E	Equipment, 8	3. UN 2809, P	GIII ERG #	172				0	0000		
									AF	76	P	wood.		
15. GEN	ial Handling Instruction	R'S CERTI	FICATION: I her	reby declare that	the contents of this	iis consignment a	are fully and	3 accurately des	scribed above	by the proper sh	ipping name	, and are clas	sified, pac	kaged
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,		Mercury Devices /	Elemental					
BoL #	Gen/Cust.	Туре	Weight	P/U Date	In Date	Out Date	Via	Freehold Malfest #
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					

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

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se print or type. (Form designed for use on elite (12-pitch) typewriter.)			,				. OMB No.	2050-00
UNIFORM HAZARDOUS 1. Generator ID Number WASTE MANIFEST CONTRACTOR	2. Page 1 of	3. Emergency Response	iffin -		957		2 J.	JK
5. Generator's Name and Mailing Address		Generator's Site Address (	(if different that	n mailing addres	s)			
6. Transporter 1 Company Name				U.S. EPA ID N				
7. Transporter 2 Company Name				U.S. EPA ID N				
8. Designated Facility Name and Site Address 140 Port 400 Dive Strate and the 40 Port 400 Dive	<b>ب</b> ی د			U.S. EPA ID N		संदर्धा है क	*33°	<del>.</del>
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010473514JJK	LRL - Ocala	Filters	186	2/28/2013	2/28/2013	2/28/2013	Freehold	M159845 x
10473514JJK	LRL - Ocala	Accumulation	185	2/28/2013	2/28/2013	2/28/2013	Freehold	M159845 x
10473514JJK	LRL - Ocala	PPE	75	2/28/2013	2/28/2013	2/28/2013	Freehold	M159845 x
10473514JJK	LRL - Ocala	Ampules	153 652	2/28/2013	2/28/2013	2/28/2013	Freehold	M159845 x

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Exhibit# 1Db

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Lighting Resources LLC					·/	
25. Transporter Company Name Franchable Constants			U.S. EPAID	Number	26164	
26. Transporter Company Name			U.S. EPAIDI	Number		
27a. 27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, HM and Packing Group (if any))	28. Contai No.	ners Type	29. Total Quantity	30. Unit WL/Vol.	31. Waste Codes	4
Mercury Containe Devices/Granda	7	De	237	P	0009	
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32. Special Handling Instructions and Additional Information				L		
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34. Transporter Acknowledgment of Receipt of Materials						
Printed/Typed Name Signature				••	Month Day	Ye
35. Discrepancy						
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposa), and re	cycling systems)			1		
orm 8700-22A (Rev. 3-05) Previous editions are obsolete.		5			D FACILITY TO GEN	

		Mercury Devices / Eler	nental		5			
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BoL #	Gen/Cust.	Туре	Weight	P/U Date	In Date	Out Date	Vla	Maifest #
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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
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Exhibit# 11a

# Exhibit#11b

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UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number FLP:000070565	* * * *	2. Page 1 of	3. Emergency F		4. Manifest		<sup>mber</sup> 952	2 J.	IK
Generator's Name and Maili	the second se					t than mailing addre		302	2 00	
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Generator's Phone:				1996-00-0		U.S. EPA ID	Number			_
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contaminated crushed glass from Costa Rica. The drums were shipped as a D009 hazardous waste. LR stall 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)(l). This regulation requires the owner or operator of a facility that has arranged to receive hazardous wastefrom 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 wastefor more than 24 hours but 10 days or less (hereinafter referred to as "the transfer facility') shall obtain an EPAIDEP identification numberfor each transferfacility location and notify the Department using Form 62-730.900(1)(b). "8700-12FL – Florida Notification of Regulated WasteActivity." effective date January 4. 2009 [adopted by reference in paragraph 62-730.150(2)(a), F.A.C.J.

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  $40 \ C.F.R. \le 264.12(a)(l)$ . 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 <u>universal waste</u> 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.

April 24, 2013 Page 9

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PAGE 02/04

# 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:

# Exchibit#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.

Sincérely,

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 # 139



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 Bishow Clark

Bonnie Bishop-Clark, Facility Manager

805 E. Francis Street Ontario, California 91761 (909) 923-7252 1522 E. Victory Street, Suite #4 Phoenix, Arizona 85040 (602) 276-4278 498 Park 800 Drive Greenwood, Indiana 46143 (317) 888-3889 101 E Bowie St. Fort Worth TX 76110 (817) 921-1440



LIGHTING RESOURCES. LLC 1007 SW 16th Lane Ocala, FL 34471 (352) 509-3001 · Fax (352) 509-3012 (855) 502-3001



Exbibit#13b

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

805 E. Francis Street Ontario, California 91761 (909) 923-7252

1522 E. Victory Street, Suite #4 Phoenix, Arizona 85040 (602) 276-4278

498 Park 800 Drive Greenwood, Indiana 46143 (317) 888-3889

101 E Bowie St. Fort Worth TX 76110 (817) 921-1440

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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)(l).

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

	Permit	6-Jul-12
Dates are completion dates	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
<b>Requirements by Title</b>						
Heath Clark	Operations Mgr		x	x	ж	х
Aaron Chappell	Processing		x	х		X
Anthony McDonald	Shipping Supervisor		x	x		ж
Jim Miller	Shift Supervisor		X	X		x
Roderick Richardson	Processing		я	Х	15	х
Bonnie Bishop-Clark	Facility manager		ж	x	x	х
Full Course Scheduled						
Heath Clark	Operations Mgr		May-12	+ + + +	****	10/6/2011
Aaron Chappell	Processing	1/28/2013	33%	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	33%	2/5/2013	2/5/2013	
Bonnie Bishop-Clark	Facility manager		May-12	ate specific	<b>+</b> + <b>+ + +</b>	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	0
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	3

\*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 takepart 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.J 6(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 writtenjob description for each position listed under paragraph (d)(l) 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. RCRA CEI April 24, 2013 Page 12

Exhibit#159

3.2.1 LIGHTING RESOURCES, LLC OCALA, FLORIDA **Training Provider Training Date Training Topic** Bishow Waste 5-23-12 (Injuersal 5-23-12 ight-to-know-Mercury 5-23-12 pn 00 Prichtation 6-13-12 Satety -16-12 0-16-12 Inderstanding Hazwoper -29-12 inc BUS tazam tanding Chemical Hazards -29-12 terial Safety Data Sheet -16-12 Labeling -14-12 Response 6-18-12 Emergency 7-2-12 onitorino 00 rocedures 7- -12 Sishon Release & Spill Clean-Ups Bishop Protective Equipment 7-2-12 Personal Protection 7-2-12 Sishop Respiratory 7-4-12 contamination Procedures Bishows 7-4-12 Bishon Dealing With The Media R 7-2-12 Bishow Modica Surveillance Anthony Mc Donald Name (Printed): Signature: Mithanh M. MC Demale Date: 7-5-12 Time: 2:35

Exhibit# ISb

	New York Providence	
		HTING RESOURCES, LLC OCALA, FLORIDA
	RECORD OF FA	CILITY PERSONNEL TRAINING
Training Date	Training Provider	Training Topic
7-2-12	B. Bishap	Work Practices & Engineering
7-4-12	B. Bishop B. Bishop	Electrical Safety Fire Prevention
6-14-12	HC Clark	Heat Stress
6-18-12	HC Clark	Confined Spaces
	·	*Forklift Workshop
	n p T	#* Drivers (In addition)
5-23-12	B. Bishop B. Bishop	Hours of Service

Name (Printed): Anthony Mc Donald

Time: 2-35

Signature:

Date: 7-5-12

# Exhibit# 169

		ITING RESOURCES, LLC OCALA, FLORIDA
	RECORD OF FA	CILITY 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 Hamardous Materials
6-28-12	BBC	Understanding Chemical Hanards
Name (Printed):	Jason Sim	-
	as line,	
Date: 9	-10-12 Time: 2.	oo pm

# Exhibit#166

		ITING RESOURCES, LLC OCALA, FLORIDA
	RECORD OF FAC	CILITY PERSONNEL TRAINING
Training Date 6-28-12 6-28-12 5-14-12 7-2-12 5-14-12		Training Topic Hammat LabEling Fire Prevention Electrical Safety Work Practices & Engineering Confined Spaces
	Clark Environmental	Drivens (In addition): CSA - Drivers - Safety & Compliance Hours of Service DOT Hazmat Training Adarchouse (In addition) Forklift Workshop
Signature:	Jason Sims Jason ling	



LIGHTING RESOURCES, LLC 1007 SW 16th Lane Ocala, FL 34471 (352) 509-3001 · Fax (352) 509-3012 (855) 502-3001



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,

mic Bishogs-Clork

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

1522 E. Victory Street, Suite #4 Phoenix, Arizona 85040 (602) 276-4278

498 Park 800 Drive Greenwood, Indiana 46143 (317) 888-3889

101 E Bowie St. Fort Worth TX 76110 (817) 921-1440

## Exhibit# 1716

## **EMERGENCY CONTACT LIST**

## Emergency Coordinator: (Change)

Name:	Jason Muhlenkamp (Operations Manager)
Office Phone:	352-509-3001
Cell Phone:	352-789-4009
Address:	1007 SW 16 <sup>th</sup> 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 34 <sup>th</sup> 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 66<sup>th</sup> Street Ocala, FL. 34480

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

Exhibit# 189



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

LIGHTING RESOURCES, LLC



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.

Juat

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

Respectfully,

Bonnie Bishop-Clark Lighting Resources LLC 1007 SW 16<sup>th</sup> Lane, Ocala, FL. 34471 352-509-3001

805 E. Francis Street Ontario, California 91761 (909) 923-7252 1522 E. Victory Street, Suite #4 Phoenix, Arizona 85040 (602) 276-4278 498 Park 800 Drive Greenwood, Indiana 46143 (317) 888-3889 101 E Bowie St. Fort Worth TX 76110 (817) 921-1440

Exhibit# 186

## **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 34<sup>th</sup> Ave. #905, Ocala, FL 34474

Alternate Emergency Coordinator #1: (Change)

Name:Anthony McDonald (Operations Manager)Cell Phone:352-502-1196Work Phone:352-509-3001Address:1360 NE 175<sup>th</sup> 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#18c

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 66<sup>th</sup> Street Ocala, FL. 34480

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

Exhibit#10	7

Position Title (#)	New Employee Training Required Training
Part I - New Employee Orientation:	
ALL Staff	<ul> <li>Corporate safety policies and procedures</li> <li>Site control and works zones</li> <li>Hazardous chemical and waste management</li> <li>Pre-placement physical requirements</li> <li>Work group indoctrination</li> <li>Plant tour: process and safety equipment</li> <li>OSHA hazard communication standard</li> <li>Production tasks orientation</li> <li>Environmental and waste control</li> <li>Work group rotation</li> <li>Laboratory tasks orientation</li> <li>Maintenance tasks orientation</li> <li>Transportation tasks orientation</li> <li>Material handling tasks orientation</li> </ul>
Part II – Title Specific Training:	
Facility Manager (1)	<ul> <li>40-Hour HAZWOPER Training</li> <li>Universal Waste Handler Training</li> <li>Advanced RCRA Training</li> <li>Advanced U.S. DOT Hazardous Materials Training</li> <li>Courses 2 and 3 (see next page)</li> </ul>
Operations Manager (1)	<ul> <li>40-Hour HAZWOPER Training</li> <li>Universal Waste Handler Training</li> <li>Advanced RCRA Training</li> <li>Advanced U.S. DOT Hazardous Materials Training</li> <li>Courses 2 and 3 (see next page)</li> </ul>
Shift Supervisor (1)	<ul> <li>40-Hour HAZWOPER Training</li> <li>Universal Waste Handler Training</li> <li>Advanced U.S. DOT Hazardous Materials Training</li> <li>Courses 2 and 3 (see next page)</li> </ul>
Shipping Supervisor (1)	<ul> <li>40-Hour HAZWOPER Training</li> <li>Universal Waste Handler Training</li> <li>Advanced U.S. DOT Hazardous Materials Training</li> <li>Courses 2 and 3 (see next page)</li> </ul>
Customer Service and Transport Manager (1)	<ul> <li>24-Hour HAZWOPER Training</li> <li>Universal Waste Handler Training</li> <li>Advanced U.S. DOT Hazardous Materials Training</li> <li>Courses 2 and 3 (see next page)</li> </ul>
Driver -CDL Class "A" (4)	<ul> <li>24-Hour HAZWOPER Training</li> <li>Universal Waste Handler Training</li> <li>Advanced U.S. DOT Hazardous Materials Training</li> <li>Courses 2 and 3 (see next page)</li> </ul>
MCL / Lamp Processing Operators (2)	<ul> <li>40-Hour HAZWOPER Training</li> <li>Universal Waste Handler Training</li> <li>Advanced U.S. DOT Hazardous Materials Training</li> <li>Courses 2 and 3 (see next page)</li> </ul>



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.

A Street	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 equivalen 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 equivaler 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-yea 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/inciden 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.				



Exhibit#21

\_\_\_\_\_

## Lighting Resources Florida Facility Employee and Position Title

			HW Position
Bonnie	Bishop-Clark	Facility Manager	x
Anthony	McDonald	Shift Supervisor	x
Heath	Clark	<b>Operations Manager</b>	x
Jamie	Shortt	Transport Manager	х
Rueben	Anderson	Shift Supervisor	х
Aaron	Chappell	Processor	х
Willie	Barner	Processor	х
Brent	Palmertree	Shift Supervisor	х
Elvy	McCranie	Processor	х
Carlos	Negros	Driver	х
Luis	Narvarro	Driver	х
Jim	Miller	Shift Supervisor	x
Rosemarie	Knox	Shipping Supervisor	х
Kevin	Brewster	Processor	x
Judie	DeLutis	Office - Non-hazardous	n/a
Antonio	Speed	Processor PT	х
Ryan	Cartier	Processor PT	х
Rod	Richardson	Processor	х
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 documentfiled or required to be maintained pursuant to the provisions of this act.

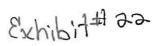
LR is in apparent violation of 40 C.F.R. § 265.JS(d). This regulation requires owners and operators must record inspections in an inspection log or summary. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and 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 <u>knowinglv</u> 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;

Lighting Resources, LLC. RCRA CEI April 24, 2013 Page 13



### WFFKI V INSPECTION LOC

**1	LERET HUST ECTION	LOG		
Inspector: Bonnie Bishop-Clark Clearly Print Name	Date: Friday 4.5.13	Time: 4:40 PI	M	
Accumulation Area Inspected: Calciu	m Phosphate Powder N	umber of Cont	ainers:	6
Are all containers in good cond	lition?	Yes	No	
Is there any evidence of leaks of	or spills?	Yes	No	
Are all containers labeled "Haz	ardous Waste"?	Yes	No	
Are all containers marked with	an accumulation start da	te? <u>Yes</u>	No	
Are all containers closed?		Yes	No	
Is there adequate aisle space be	tween rows of drums?	Yes	No	
Is spill control equipment avail	able?	Yes	No	
Repairs or Remedial Action			_	Date
Inspector: Bonnie Bishop-Clark Clearly Print Name	Date: Friday 04.12.13	Time:	4:30 PM	М
Accumulation Area Inspected: Calciu	im Phosphate Powder	Number of Co	ntainer	's: 9
Are all containers in good cond	lition?		Yes	No
Is there any evidence of leaks of	or spills?		Yes	<u>No</u>
Are all containers labeled "Haz	ardous Waste"?		Yes	No
Are all containers marked with	an accumulation start da	ite?	Yes	No
Are all containers closed?			Yes	No
Is there adequate aisle space be	tween rows of drums?		Yes	No

Observations:

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

Is spill control equipment available?

Date

No

Yes

Exhibit #23

WEEKLY INSPECTION LOG
Inspector: Low Busy Chil Date: 4-19-13 Time: 4:40 PM
Bonnie Bishon Clark
Accumulation Area Inspected: Calcium Phosphate Powder Number of Containers:
Are all containers in good condition? (Yes) No
Is there any evidence of leaks or spills? Yes No
Are all containers labeled "Hazardous Waste"?
Are all containers marked with an accumulation start date? Yes No
Are all containers closed? Yes No
Is there adequate aisle space between rows of drums? <u>Yes</u> No
Is spill control equipment available? Yes No
Observations:
(If containers in poor condition or leaks/spills were found, please note action taken in area below) Repairs or Remedial Action Date
Repairs or Remedial Action Date

Inspector: Some Schall Date: 4-26-13 Clearly Print Name Bonnie Bishop Clark

Time: 4: 30 PM

Accumulation Area inspected. Calcium Phosphate Fowder Funder of Containers. $\varphi$	<b>Accumulation Area Inspect</b>	ed: Calcium Phosphate Powder	Number of Containers:	6
---------------------------------------------------------------------------------------	----------------------------------	------------------------------	-----------------------	---

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

Date

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. RCRA CEI April 24, 2013 Page 14



LIGHTING RESOURCES, LLC

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



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 Bishogs-Clark

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

805 E. Francis Street Ontario, California 91761 (909) 923-7252 1522 E. Victory Street, Suite #4 Phoenix, Arizona 85040 (602) 276-4278 498 Park 800 Drive Greenwood, Indiana 46143 (317) 888-3889 101 E Bowie St. Fort Worth TX 76110 (817) 921-1440

## 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 16 <sup>th</sup> Lane, Ocala, FL. 34471
	*

Alternate Emergency Coordinator #1: (Change)

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

Alternate Emergency Coordinator #2: (Change)

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

# Eshibit# auc

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 66<sup>th</sup> Street Ocala, FL 34480

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

# Exhibit# 250



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



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

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

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Bonnie Bishogs-Clo

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

**205 E. Prancis Street** Optarle, California 91751 -(909) 923-7252

1522 E. Motory Street, Suite 常生 Phoenix, Arizona 25040 (602) 228-4278

498 Park 800 Drive . Greenwood, Indiana 46143 (317) 888-3869

101 E Bowie EL Fort Worth PX 76110 (812) 621-1440

Exhibit # 25b

## EMERGENCY CONTACT LIST

Emergency Coordinator: (No Change)Name:Bonnie Bishop-Clark (Facility Manager)Office Phone:352-509-3001Cell Phone:866-961-9100Address:3101 SW 34<sup>th</sup> 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 175<sup>th</sup> 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# asc

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 66<sup>th</sup> 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

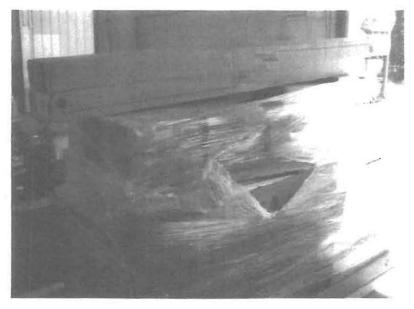


Figure 2 - Unlabeled lamp boxes



Figure 3 - Unlabeled lamp boxes



Figure 4 - Photo showing broken lamps on top of container







Figure 6 -Drums storing universal waste batteries



Figure 7 -Unlabeled container storing UW Batteries



Figure 8 - Unlabeled container storing UW Batteries

# exhibit#80

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						2				
	rator's Phone:					-				
6. Tra	nsporter 1 Company Nam	e					U.S. EPA ID	Number		
7 Tra	nsporter 2 Company Nam	8					U.S. EPA ID	Number		
8. De	signated Facility Name an	d Site Address					U.S. EPA ID	Number		
	ж эк:									
Facili	ly's Phone:						1			
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		and an a								
	y's Phone:									
8c. S	ignature of Alternate Facil	ty (or Generator)							Month Day	Year
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