

## LIGHTING RESOURCES, LLC

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

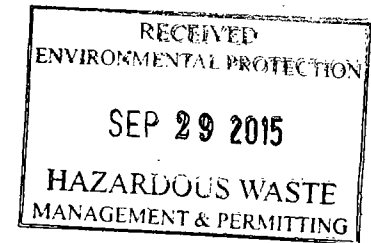
RECEIVED

SEP 29 2015



EMITTING & COMPLIANCE  
STANCE PROGRAM

September 24, 2015



Mr. Michael Eckoff  
Environmental Specialist  
Florida Department of Environmental Protection  
3319 Maguire Boulevard, Suite 232 Telephone: 407-897-4308  
Orlando, FL 32803-3767 Email: Michael.eckoff@dep.state.fl.us

Mr. Glen Perrigan  
Environmental Manager  
Florida Department of Environmental Protection  
Bob Martinez Center, room 330E  
2600 Blair Stone Road MS4560 Telephone: 850-245-8749  
Tallahassee, FL 32399 Email: glen.perrigan@dep.state.fl.us

Mr. Parvez A. Mallick  
Environmental Engineer  
RCRA and OPA enforcement & Compliance Branch  
Atlanta Federal Center  
61 Forsyth Street S.W. Telephone: 404-562-8594  
Atlanta, GA 30303 Email: mallick-parvez@epa.gov

Dear Mr. Eckoff:

This letter is in response to your email request of September 8, 2015 for additional information as it relates to the audit that was conducted on July 31, 2015 by you and Mr. Mallick and Mr. Perrigan.

Lighting Resources goal is to do everything possible to protect human health and the environment. This means to educate and train on an ongoing basis. The daily compliance walk encourages each and every employee to take

responsibility for the rules and regulations of the facility. Based on the audit results, additional training programs have been implemented to impress on everyone the importance of labeling and lids and exceptions to the norm.

Attached you will find the items listed in your letter along with the response and supporting documentation. Issues with labelling and lids were corrected prior to the conclusion of the audit. We have attempted to document the corrections with pictures in most cases. As the second shift continued to process after the audit, in some cases it was not possible to take pictures of the corrected items as they had been moved. In those cases we have provided pictures of the current status.

Several items requested are supported by the permit itself. In those cases we have supplied supporting pages from the permit.

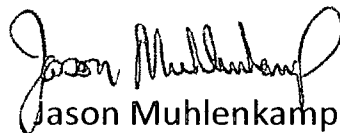
We appreciate all of your input during the audit. This information helps us to improve our training and procedures to more effectively operate the facility. Your list provided for the all the specifics of what they were changing the day of the audit and provided the opportunity to explain to staff the reasons and logic for the changes that day and the improvements that have been implemented.

Sincerely,



Susan Richard

Chief Compliance Officer



Jason Muhlenkamp

Florida Branch Manager



## LRL Response to DEP Sept 8, 2015 email

1. Please provide the following information regarding the two 5-gallon containers with unknown contents found in your supply trailer.
  - a. The contents of the containers and how the contents were determined, i.e., sampling results.
  - b. The disposition of the containers. If disposed off-site, please provide a copy of the disposal receipt, i.e., manifest.
  - c. If known, the date the containers arrived on-site, and the name and contact information of the generator and/or transporter.
  - d. What operational changes have been implemented in identifying and handling unacceptable material to prevent similar issues in the future.

### Response:

These containers containing liquid were included in a trailer load from our customer. As we do not receive liquid, we do not open the containers. . As liquid, they are rejected and returned to the customer. However, because of the audit, we did open the container and determined that it had the smell and texture of cleaning solvent for tools and parts.

This material we received on a trailer loaded by the customer for a trailer swap. The product was not visible to the driver when he checked the load. The document that represents the receipt of the trailer load is attached, as well as, the

## LRL Response to DEP Sept 8, 2015 email

document we created to return the buckets to the customer. Pictures of the labeled drums are attached.

We have taken several steps to implement rules and procedures to handle rejected loads. We have designed a bright yellow Reject label that must be created in duplicate for any material that may not be accepted. One copy is attached to the container with the receiving bill of lading. The other goes to the front office to notify the customer of the rejected load and advise when and how it will be returned. The reject form and log form listed in the Permit are complete by the office and kept for future reference. The return document is created for the driver. Sample copies are attached.

If a common carrier/customer truck attempts to delivery material that is unacceptable, it is rejected immediately and returned with the driver. The reject form will be completed and handled as noted above.

We have also included this training in our staff safety meeting this week. A copy of the attendance sheet for the meeting is attached.



Tr# KA10217

1a

HERITAGE - CRYSTAL CLEAN - BILL OF LADING

UNIVERSAL WASTE

HCC Use Loc: AHUB - LRES PO# 67577 Page 1 of 1 Doc#: A2815A PB: 140314

Offerer's Name and Shipping Address

HERITAGE-CRYSTAL CLEAN, INC
5100 A TULANE DR. SW
ATLANTA, GA 30336
Offerer Phone: (877) 938-7948

Offerer EPA ID

ILR000130062

Transporter 1 Company Name

Transp 1 EPA ID

Transp 1 Phone

Receiving Facility

LIGHTING RESOURCES, LLC
1007 SW 16TH LANE
OCALA, FL 34471

Facility EPA ID

FLR000070565
24 hr Emergency
1-800-424-9300, "1"

Facility Phone

(866) 375-7340

Table with 5 columns: Shipping Description and DOT Description (as applicable), Container NO., Type, Total QTY, Unit. Rows A through R listing various waste items like batteries, lamps, and scrap electronics.

Special Handling Instructions, Additional Information and Handling Codes (as Applicable)

PO# 67577

OFFERER'S CERTIFICATION:

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Printed/Typed Name: Nick Day

Signature: [Signature]

Date: 7/14/15

Transporter 1 Acknowledgement of Receipt Materials

Printed/Typed Name: Carlos Aguirre

Signature: [Signature]

Date: 7/10/15

Facility Owner or Operator:

Certification of receipt of materials covered by this bill of lading.

Printed/Typed Name: Jason Mullenkamp

Signature: [Signature]

Date: 7/21/15



LIGHTING RESOURCES LLC  
SOUTHEASTERN BRANCH

INTERNAL REQUEST FORM

16

CUSTOMER INFO	BILL TO:	HERITAGE CRYSTAL CLEAN INC
	REQUEST BY	NICK DAY
	PHONE	404-783-5921
	EMAIL	MICHEAL.DAY@CRYSTAL-CLEAN.COM
	Request DATE	8.31.15
P.O. #	EMAILED	

OTHER -

LOGISTICS

ROUTE NAME	ATLANTA
ROUTE DATE	8.07.15
Estimated \$ Amount:	2000.00

DRIVER SCHEDULED

DRIVER	CARLOS NEGRON
OVERNIGHT	YES X DAYS - 2 NO

NOTES:

GENERATORS SITE INFORMATION	Company:	HERITAGE CRYSTAL CLEAN
	Street Address:	5100 A TULANE DRIVE S.W.
	City:	ATLANTA
	State:	GEORGIA
	Postal Code:	30336
	County	FULTON
	Contact Name:	NICK
	Contact Phone:	404-783-5921
Hours of Operation:		
Semi Accessible:	YES	

Return 2 - 5 Gallon Buckets of Rejected Material

MATERIALS TO BE PICKED UP:	

DRIVER NOTES

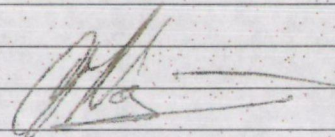
DROP CONFIRMATION

SUPPLIES RECEIVED?	YES	NO
CONFIRMED BY - PRINT NAME:		
SIGNATURE		

\*\*\* SIGNATURE REQUIRED TO RECEIVE SUPPLIES \*\*\*

SUPPLIES TO BE DELIVERED	FIBER DRUMS - 2'	
	FIBER DRUMS - 4' SMALL	
	FIBER DRUMS - 4' LARGE	
	FIBER DRUMS -	
	FIBER DRUMS - 8'	
	BOXES - 4 FOOT	BUNDLES
	BOXES - 8 FOOT	BUNDLES
	BOXES - UBEND / HID	
	GAYLORD / CUBIC YARD BOX	
	POLY PAILS w/ LIDS 5 GALLON	
	STEEL DRUM - 55 GALLON	
	POLY DRUM - 50 GALLON	
TELESCOPING BOXES		
PALLETS		

CUSTOMER NOTES





POLYETHYLENE

# 1c

ANOTHER QUALITY PRODUCT FROM

Chemical  
Phillips

REJECTED  
WASTE  
MATERIAL



REJECTED  
WASTE  
MATERIAL

CONTAINS  
HAZARDOUS  
MATERIALS



# REJECTED

RETURN TO SUPPLIER

DATE RECEIVED:

DATE RETURNED:

GENERATOR:

ADDRESS:

CITY:

STATE:

ZIP CODE:

REJECTED CONTENTS:

\*\*\*OFFICE COPY FOR REJECTION LOG\*\*\*

1  
2



1e



LIGHTING RESOURCES, LLC  
OCALA, FLORIDA

LOAD REJECTION LOG

Date	Facility Staff Name	Description of Incident and Response Taken

Name (Printed): \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_ Time: \_\_\_\_\_



18



LIGHTING RESOURCES, LLC  
OCALA, FLORIDA

**UNAUTHORIZED WASTE – LOAD REJECTION FORM**

Transporter Company Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Vehicle Type / Truck Number: \_\_\_\_\_

Vehicle License Number: \_\_\_\_\_

Driver's Name: \_\_\_\_\_

Generator/Source: \_\_\_\_\_

Description of Unauthorized Waste:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Actions Taken for Removal:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Parties / Authorities Notified: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inspector's Name (Printed): \_\_\_\_\_

Inspector's Signature: \_\_\_\_\_

Date: \_\_\_\_\_ Time: \_\_\_\_\_



# Safety & Training Meeting Record Form

19

<b>Instructor Name</b> Susan Richards		<b>Employer Name</b> Lighting Resources, LLC		
<b>Meeting Date</b> 9-23-15		<b>Location</b> 1007 SW 16 <sup>th</sup> Lane		
<b>Start / End Time</b> 2:30pm - 3:30pm		<b>City</b> Ocala	<b>State</b> FL	<b>ZIP</b> 34471

## Safety Topic Presentation

Topic Addressed	Program Leader	Length of Presentation	Discussion Comments
July 31st Audit	Susan Richards	1 Hour	Labels, boxes, compliance, glass

## Attendance

The employees listed have satisfactorily participated and been tested per regulatory/company training requirements.

Employee Name	Position / Job Description	Employee Signature
JASON MUHLENKAMP	FACILITY MANAGER	<i>Jason Muhlenkamp</i>
SUSAN RICHARDS	CH. COMPLIANCE OFF.	<i>Susan Richards</i>
BUFF FRITZ	OPERATIONS MANAGER	<i>Buff Fritz</i>
TIM GRUBAUGH	PROCESSING SUPERVISOR	<i>Tim Grubaugh</i>
KEITH SHRUM	WAREHOUSE SUPERVISOR	<i>Keith Shrum</i>
JUSTINO CALZADA	MERCURY RECOVERY PROCESS OPERATOR	<i>Justino Calzada</i>
"MAC" ELVY MCCRANIE	MERCURY RECOVERY PROCESS OPERATOR	<i>Mac McCranie</i>
"CODY" CHRIS CULBERTSON	MERCURY RECOVERY PROCESS OPERATOR	<i>Cody Culbertson</i>
AGAPITO GARCIA	MERCURY RECOVERY PROCESS OPERATOR	<i>Agapito Garcia</i>
RICHARD CRUCE	MERCURY RECOVERY PROCESS OPERATOR	<i>Richard Cruce</i>
JAMES CARMONA	MERCURY RECOVERY PROCESS OPERATOR	<i>James Carmona</i>
RICHARD DOUGLAS	MERCURY RECOVERY PROCESS OPERATOR	<i>Richard Douglas</i>
CHRIS GEIGER	MERCURY RECOVERY PROCESS OPERATOR	<i>Chris Geiger</i>

out sick



1h

LUIS S. RODRIQUEZ	MERCURY RECOVERY PROCESS OPERATOR	Part Time
JUSTIN JAVIER	MERCURY RECOVERY PROCESS OPERATOR	Justin Javier
BRANDIN ZELLARS	MERCURY RECOVERY PROCESS OPERATOR	Brin E
KENNETH RIBBLE	MERCURY RECOVERY PROCESS OPERATOR	K. Ribble
BRICE HALL	MERCURY RECOVERY PROCESS OPERATOR	Brice Hall

**Employees not present for meeting:**

Richard Cruce  
Luis S. Rodriguez



## **LRL Response to DEP Sept 8, 2015 email**

2. Written job descriptions were not available for review. Please provide a copy of the written job description for each position including the name of the employee filling each position, requisite skill, education, or other qualifications, and duties assigned to each position.

Response:

The written job descriptions are on page 25 of the Permit/Engineering report in Table 3-2. The training required for each position is located in the Permit/Engineering report on page 24, Table 3-1. Copies are attached along with an employee list showing which Position Title applies to whom.



After receiving training, the new employees are closely supervised during the first few months of working in the Facility (by experienced and senior employees) to ensure they understand 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**.

<b>Position Title (#)</b>	<b>Job Description / Responsibilities</b>	<b>Supervisor</b>	<b>Requirements</b>
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 applicable regulations / requirements, Facility maintenance, schedules, and general recordkeeping.	Reports to Facility Manager	College degree or equivalent work experience
Processing Supervisor (1)	Oversees receiving and shipping production, equipment maintenance, and housekeeping.	Reports to Operations Manager	Min. H.S. diploma and 1-year experience at Lighting Resources Facility
Warehouse Supervisor (1)	Directly supervises unloading and inventory of incoming materials and loading of outbound material.	Reports to Operations Manager	Min. H.S. diploma and 6-months experience at Lighting Resources Facility
Logistics Coordinator (1)	Directly supervises 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
Office Administrator (1)	Handles invoicing, purchase orders, creates Certificates of Recycling, maintains facility operating records, billing issues	Reports directly to Facility Manager	Min. H.S. diploma and 6-months experience at Lighting Resources Facility
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 Logistics Coordinator	Min. H.S. diploma or equivalent and min. 2-year successful, accident/incident-free commercial driving experience
Mercury Recovery Process Operator (4)	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.



<b>Table 3-1</b> <b>Lighting Resources, LLC - Mercury Recovery Facility, Ocala, FL</b> <b>Initial New Employee Training</b>	
<b>Position Title (#)</b>	<b>Required Training</b>
<b>Part I – New Employee Orientation:</b>	
All Staff	<ul style="list-style-type: none"> <li>▪ Company policies and procedures</li> <li>▪ Mercury Right to Know</li> <li>▪ RCRA Training</li> <li>▪ Pre-placement physical requirements</li> <li>▪ Universal Waste Handler Training</li> <li>▪ Plant tour: process and safety equipment</li> <li>▪ U.S. DOT Hazardous Materials Training</li> <li>▪ OSHA Hazard Communication</li> <li>▪ Production tasks orientation</li> <li>▪ Environmental and waste control</li> <li>▪ Material handling tasks orientation</li> </ul>
<b>Part II – Title Specific Training:</b>	
Facility Manager (1)	<ul style="list-style-type: none"> <li>▪ 40-Hour HAZWOPER Training</li> <li>▪ Air Monitoring</li> <li>▪ Reasonable Suspicion Training</li> <li>▪</li> </ul>
Operations Manager (1)	<ul style="list-style-type: none"> <li>▪ 40-Hour HAZWOPER Training</li> <li>▪ Air Monitoring</li> <li>▪ Reasonable Suspicion Training</li> <li>▪ Forklift Certification</li> <li>▪</li> </ul>
Processing Supervisor (1)	<ul style="list-style-type: none"> <li>▪ 40-Hour HAZWOPER Training</li> <li>▪ Forklift Certification</li> </ul>
Warehouse Supervisor (1)	<ul style="list-style-type: none"> <li>▪ 40-Hour HAZWOPER Training</li> <li>▪ Air Monitoring</li> <li>▪ Forklift Certification</li> </ul>
Logistics Coordinator (1)	<ul style="list-style-type: none"> <li>▪ 24-Hour HAZWOPER Training</li> <li>▪ Reasonable Suspicion Training</li> </ul>
Office Administrator (1)	<ul style="list-style-type: none"> <li>▪ 24-Hour HAZWOPER Training</li> <li>▪ Reasonable Suspicion Training</li> </ul>
Driver -CDL Class "A" (4)	<ul style="list-style-type: none"> <li>▪ 24-Hour HAZWOPER Training</li> <li>▪ HAZMAT Endorsement</li> <li>▪</li> </ul>
MCL / Lamp Processing Operators (2)	<ul style="list-style-type: none"> <li>▪ 24-Hour HAZWOPER Training</li> </ul>
<b>Note:</b> Personnel receive training on the appropriate use and types of personal protective equipment to be used at the Facility. Further, personnel are fit tested for respirator equipment.	



## FACILITY STAFFING SUMMARY

POSITION TITLE	JOB DESCRIPTION / RESPONSIBILITIES	SUPERVISOR	REQUIREMENTS	NAME OF EMPLOYEE(S)
<b>FACILITY MANAGER</b>	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	JASON MUHLENKAMP
<b>OPERATIONS MANAGER</b>	RESPONSIBLE FOR OPERATIONAL COMPLIANCE WITH APPLICABLE REGULATIONS / REQUIREMENTS, FACILITY MAINTENANCE, SCHEDULES, AND GENERAL RECORDKEEPING.	REPORTS TO FACILITY MANAGER	COLLEGE DEGREE OR EQUIVALENT WORK EXPERIENCE	BUFF FRITZ
<b>PROCESSING SUPERVISOR</b>	OVERSEES RECEIVING AND SHIPPING PRODUCTION, EQUIPMENT MAINTENANCE, AND HOUSEKEEPING.	REPORTS TO OPERATIONS MANAGER	MIN. H.S. DIPLOMA AND 1 YEAR EXPERIENCE AT LIGHTING RESOURCES FACILITY	TIM GRUBAUGH
<b>WAREHOUSE SUPERVISOR</b>	DIRECTLY SUPERVISES UNLOADING AND INVENTORY OF INCOMING MATERIALS AND LOADING OF OUTBOUND MATERIAL	REPORTS TO OPERATIONS MANAGER	MIN. H.S. DIPLOMA AND 6 MONTHS EXPERIENCE AT LIGHTING RESOURCES FACILITY	KEITH SHRUM
<b>LOGISTICS COORDINATOR</b>	DIRECTLY SUPERVISES 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 TO FACILITY MANAGER	MIN. 2 YEARS COLLEGE OR EQUIVALENT WORK EXPERIENCE AND MINIMUM 5 YEARS OF SUPERVISORY EXPERIENCE IN RELATED SERVICE INDUSTRY	MELANIE JORDAN DUSTIN HICKEY
<b>OFFICE ADMINISTRATOR</b>	HANDLES INVOICING, PURCHASE ORDERS, CREATES CERTIFICATES, MAINTAINS FACILITY OPERATING RECORDS AND BILLING ISSUES	REPORTS TO FACILITY MANAGER	MINIMUM H.S. DIPLOMA AND 6 MONTHS EXPERIENCE AT LIGHTING RESOURCES FACILITY	ROSEMARIE KNOX
<b>DRIVER - CDL CLASS "A"</b>	PERFORMS OVER THE ROAD TRANSPORTATION; LOADING/UNLOADING OF MATERIALS USING VARIOUS EQUIPMENT; MAINTAINS VEHICLE AND VEHICLE SAFETY CHECKS; PREPARES BILLS OF LADING, MANIFESTS, LOGBOOKS, TRIP REPORTS, AND SEALING/REPACKING OF CONTAINERS FOR MATERIAL TRANSPORT TO MEET DOT REGULATIONS.	REPORTS TO LOGISTICS COORDINATORS	MIN. H.S. DIPLOMA OR EQUIVALENT AND MINIMUM 2 YEAR SUCCESSFUL, ACCIDENT/INCIDENT FREE COMMERCIAL DRIVING EXPERIENCE	CARLOS NEGRON LUIS NAVARRO MARK COBURN RICHARD DOUGLAS
<b>MERCURY RECOVERY PROCESS OPERATOR</b>	PERFORMS PRODUCTION COMPONENT SEPARATION OF MCL's USING BALKAN 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 or SHIFT SUPERVISOR	POSSESSES MANUAL DEXTERITY, PROPERLY USES P.P.E., AND ABILITY TO WORK WITH MINIMUM SUPERVISION	ELVY McCRANIE JUSTINO CALZADA AGAPITO GARCIA RICHARD CRUCE CODY CULBERTSON JAMES CARMONA CHRIS GEIGER JUSTIN JAVIER BRANDIN ZELLARS KENNETH RIBBLE BRICE HALL



## **LRL Response to DEP Sept 8, 2015 email**

3. Please provide information regarding the content of a typical monthly safety meeting.

Response:

Safety Meetings are traditionally scheduled around various topics taken from the Worker Health and Safety Plan or other sources. Usually a video showing the chosen subject is shown first. After the video there is open discussion of how it applies to our environment.

The series currently being used has directions for the instructor and a quiz for the class. The Permit lists a range of topics on page 61 of the Engineering Report. (Attached)

In addition, relevant items are discussed based on facility issues such as an injury, a rejected load, or visitor access. Everyone is advised of any recurring loads arriving and dates and times and other activities that affect the work load.

### *Monthly Safety Meetings*

Monthly safety meetings are held to reinforce and review basic safety principles. In order to maintain safety awareness Facility employees will participate in the monthly safety meetings. The topics for the monthly safety meetings will review any incidents occurring on-site during the past month and various topics taken from the *Worker Health and Safety Plan* or other sources. Topics may include:

- Site control and works zones
- Hazardous chemical and waste management
- Plant process and safety equipment
- Resource Conservation and Recovery Act (RCRA)
- Toxic Substance Control Act (TSCA)
- Review of Material Safety Data Sheets (MSDS)
- Receipt, processing, and material handling procedures
- U.S. DOT – Safe Transportation of Hazardous Materials
- Security policies and procedures
- Waste storage, staging, pre-shipment, and disposal policies, methods, and procedures
- Good housekeeping policies and procedures
- Emergency Prevention and Preparedness:
- Waste Analysis Plan
- Emergency contingency plan
- Decontamination / clean-up procedures
- Personal protective equipment and air purifying respirator training
- Air monitoring
- Basic and advanced first aid training
- Emergency site evacuation
- Fire safety and fire extinguisher training
- Lamp processing equipment use and safety
- Forklift use and safety
- Lockout / tagout procedures

### *Yearly Refresher Training*

Facility employees will receive the OSHA 8-Hour HAZWOPER refresher course to ensure that employees maintain current with their OSHA HAZWOPER certification.

U.S. DOT Safe Transportation of Hazardous Materials – The refresher course is currently on an every three year refresher schedule. Additional training as required due to changes in the laws. New employees are scheduled within the 6 months of their start date.

OSHA HAZ Com is included in the US DOT Safe Transportation. However, new employees may take it separately to complete it within the 6 month period.



4. In the lamp container and crushed lamps storage areas, rows 1 through 10, the following was noted.
- a. One drum of crushed lamps was covered with a piece of plywood that was secured to the drum with duct tape.
  - b. Not all drums of crushed lamps and lamp containers, staged on pallets, were secured with shrink-wrap, bands, or other binding after counting and labeling.
  - c. Not all lamp containers were stored in a manner that prevents breakage, i.e., containers were noted buckling or crushed, some resulting in breakage of lamps.
  - d. Not all lamp containers were labeled. In addition, not all labels on the drums of crushed mercury lamps were visible for inspection.
  - e. Not all lamp containers and crushed lamp drums were marked with a received date.
  - f. Not all lamp containers were closed.

Response:

- 4.a. The drum was received with the plywood lid. The lid was replaced during the audit with a lid and ring.
- b. The pallets of fiber drums and boxes were wrapped or re-wrapped during the audit.
- c. The pallets that show evidence of buckling and or being crushed upon receipt are transported to the processing room as soon as possible to prevent further breakage of lamps. For the safety of the employees, they are instructed not to "re-pack" during the counting process.

## **LRL Response to DEP Sept 8, 2015 email**

- d. All pallets of lamps were labeled during the audit with the applicable bill of lading.
- e. All crushed lamp drums were marked with the received date during the audit. The bill of lading on the lamp containers included the date of receipt.
- f. All lamp containers were closed/sealed during the audit.

The procedure for wrapping all lamps, sealing all boxes, dating all drums of crushed, and labeling with the bill of lading all pallets has been reviewed with all of the staff. In addition, an employee has been assigned the responsibility to ensure that the materials are properly wrapped, sealed, and labeled.



4a.

10





4c,d,b

NOTICE  
All persons must  
Register at Office  
ARSD  
Public Law 104-192  
Registration Fee: \$100

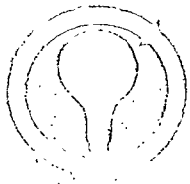
9



5. An alternate emergency coordinator was listed in the contingency plan that no longer works at the facility.

Response:

Attached please find a copy of the letter to Florida DEP with request for a Class 1 Mod, no approval required, along with the replacement page 48 showing changes. Prior employee, Jamie Shortt, has been removed and Buff Fritz, Operations Manager has been added. The FedEx proof of shipment is included.



# LIGHTING RESOURCES, LLC

1007 SW 16th Lane  
Ocala, FL 34471  
(352) 809-3001 • Fax: (352) 809-3012  
(888) 802-3001



September 22, 2015

Florida Department of Environmental Protection  
Division of Waste Management, MS#4500  
Attn: Mr. Bheem Kothur and Mr. Anthony Tripp  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJECT: Lighting Resources, LLC; EPA ID Number: FLR 000 070 565  
Operating Permit 0309339-HO-002, Marion County

Dear Mr. Kothur / Mr. Tripp:

Lighting Resources, LLC is updating our Emergency Contact Information for our permit noted above. We understand this to be a Class 1 Modification with no notice required. The applicable page 48 is attached.

If you should have any questions, please contact me at 352-509-3001 or e-mail :  
Jason.muhlenkamp@lightingresourcesinc.com.

Sincerely,

Jason Muhlenkamp  
Branch Manager

## 4.2 Emergency Contact Information

### Emergency Coordinator:

Name: Jason Muhlenkamp  
 Office Phone: 352-509-3001  
 Cell Phone: 352-789-4009  
 Address: 1850 SE 18th Ave. #3605, Ocala, FL 34471

### Alternate Emergency Coordinator #1:

Name: Buff Fritz  
 Work Phone: 352-509-3001  
 Cell Phone: 352-342-6051  
 Home Phone: 352-390-6803  
 Address: 5661 SE 9th St, Ocala, FL 34480

### Alternate Emergency Coordinator #2:

Name: Rosemarie Knox  
 Office Phone: 352-509-3001  
 Cell Phone: 352-286-5331  
 Address: 3900 NW 20th Ave., Ocala, FL 34475

### Emergency Contacts:

Ocala Police Department: 911  
 (Non-emergency): (352) 369-7134  
 Ocala Fire Department: 911  
 (Non-emergency): (352) 629-8503  
 Local Ambulance Service: 911  
 Ocala Regional Medical Center: (352) 401-1137  
 Florida DEP Central District: (407) 897-4100  
 U.S. EPA Region 4: (404) 562-8700  
 Marion County Emergency Mgmt: (352) 351-8077  
 State Warning Point: (800) 320-0519

## 4.3 Regulatory Agencies Contact Information

<b>Local</b>	<b>Marion County Emergency Mngmnt</b>
Address	692 NW 30 <sup>th</sup> Ave., Ocala, FL 34475
Phone	(352) 351-8077
<b>State</b>	<b>Florida DEP - Central District</b>
Address	3319 Maguire Blvd., Ste. 232, Orlando, FL 32803
Phone	(407) 897-4100
<b>Federal</b>	<b>U.S. EPA Region 4</b>
	Hazardous Waste Management Division
Address	61 Forsyth St. SW, Atlanta, GA 30303
Phone	(800) 241-1754
	<b>National Response Center</b>
	(800) 424-8802



ORIGIN ID: OCFA (352) 509-3001  
JASON MUHLENKAMP  
LIGHTING RESOURCES, LLC  
1007 SW 18TH LANE

OCALA, FL 34471  
UNITED STATES US

SHIP DATE: 23SEP15  
ACTWGT: 1.00 LB  
CAD: 106399579/INET3670

BILL THIRD PARTY

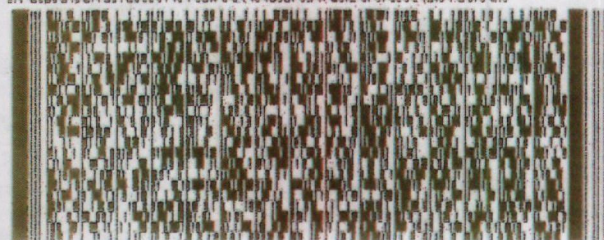
TO **ATTN: ANTHONY TRIPP**  
**FL DEPT OF ENVIRONMENTAL PROTECTION**  
**2600 BLAIRSTONE RD**  
**DIVISION OF WM, MS#4500**  
**TALLAHASSEE FL 32399**

(850) 245-8766

REF:

INV/  
PO

DEPT:



052016081091m

539JZ/CBB9J31D0

TRK#  
0201 7745 7394 0042

FRI - 25 SEP 10:30A  
MORNING 2DAY

**SH TLHA**

**32399**  
FL-US **TLH**



**After printing this label:**

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

**Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.**

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on [fedex.com](http://fedex.com). FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.



**LRL Response to DEP Sept 8, 2015 email**

6. Aisle space was not provided between the e-waste storage and the crushed lamp drums in row 10.

Response:

The material to the left of aisle 10 was moved immediately during the audit to provide the required aisle space. Pictures of both the left and the right of aisle 10 are attached as documentation.



SUPPLY STORAGE

6.① 10





10

6.②

9

AVISO  
Todos Los Vehículos deben  
Registrar en la Oficina





6 (3)

10





SUPPLY STORE

10

64





7. Not all universal waste batteries containers were labeled.

Response:

We are unable to determine the specific containers that were not labeled. The pictures from the day of the audit appear to show all containers labeled. Those pictures are attached. Additional pictures of today show the current status of the Battery Storage Area and Aisle 2.



7①





7②





7③









75)



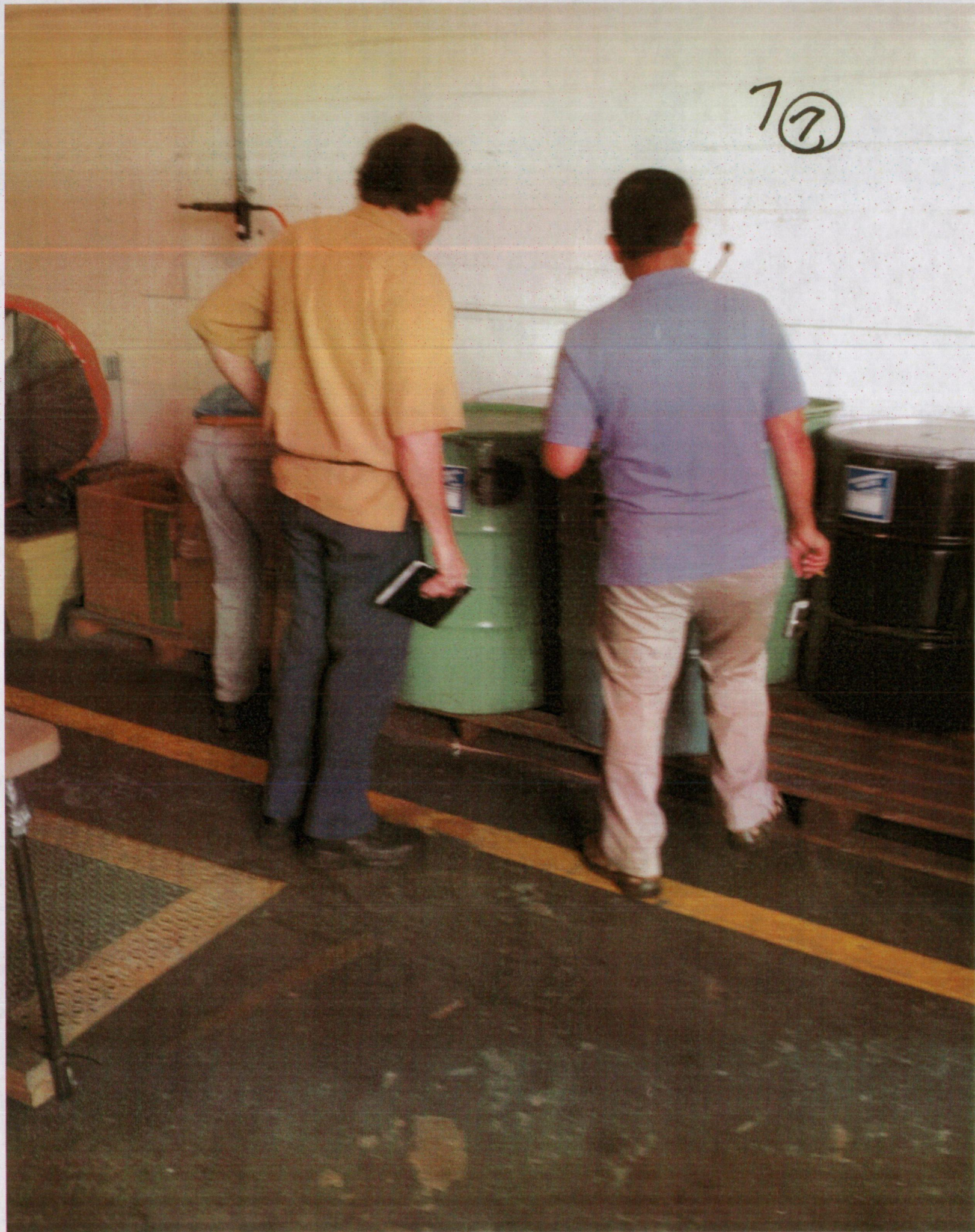


7(6)



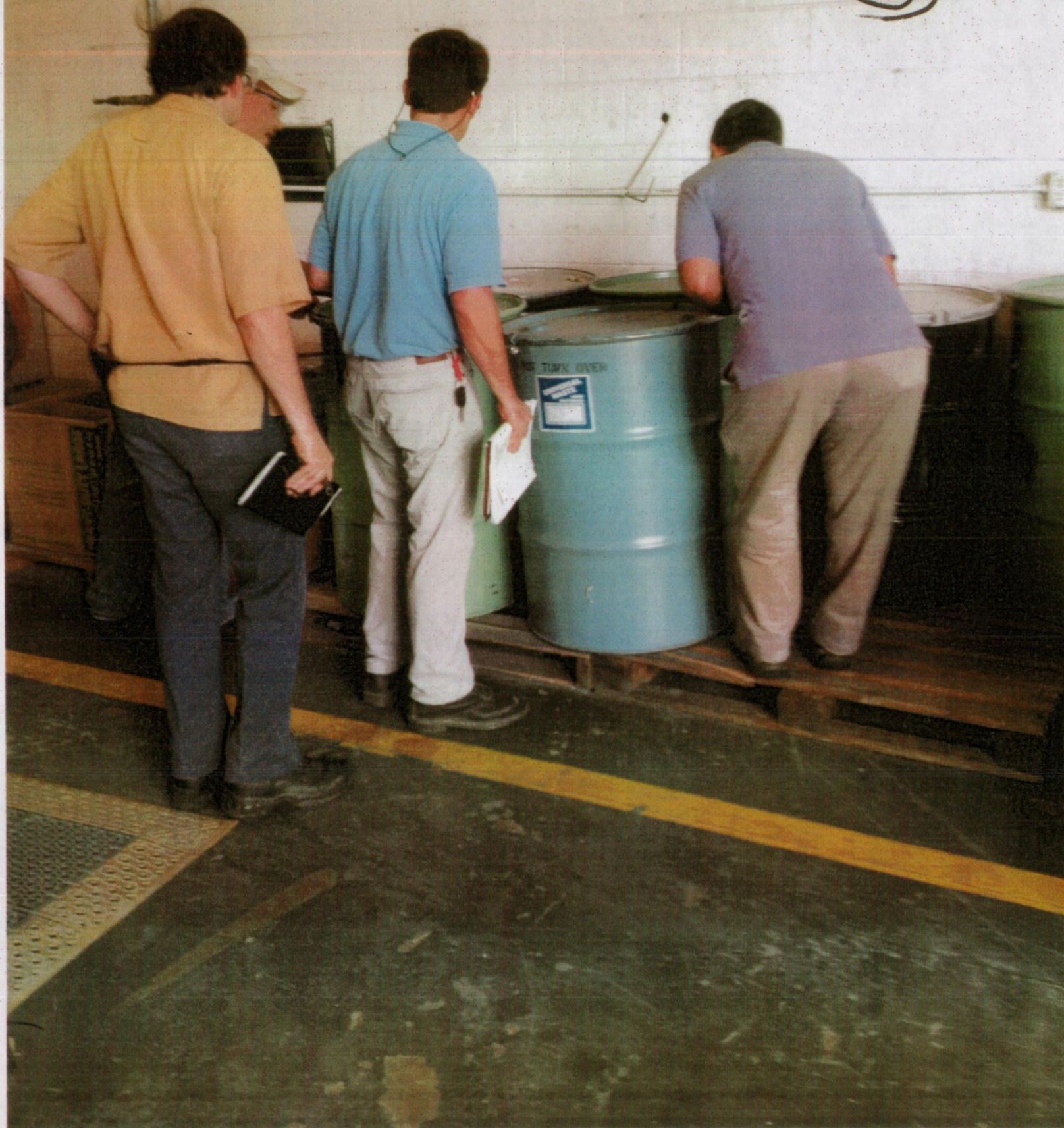


7⑦





78





## LRL Response to DEP Sept 8, 2015 email

8. In the shatter shield processing area, lamp breakage occasionally occurs during the process. Clean up material is placed in a 35-gallon poly-drum.

### Response:

The drum used for processing in the shatter shield processing area was labeled and covered/closed during the audit. Pictures are attached showing the correction.





UNIVERSAL  
WASTE

8.1  
↓



# UNIVERSAL WASTE

OPTIONAL INFORMATION

82

CRUSHED GLASS FOR



9. In the lamp receiving area, lamps are counted and sorted by type, lamp breakage occasionally occurs during this process. Clean up material is placed in a 35-gallon ploy drum. The cover on the drum was not appropriately sized rendering the drum open.
- 

Response:

The cover on the drum in the sorting/receiving area was replaced with an appropriately sized lid at the time of the audit. A picture of the correction made at the time of the audit is attached.







10. In the solid waste dumpster outside near the loading dock was end caps, glass, and CFL bases; the material appeared to be floor sweepings. The dumpster bottom had rusted through.

---

Response:

The materials in the dumpster were immediately removed during the audit. The materials were placed in the accumulation drum.

Staff has been retrained regarding the Accumulation Drums, including location, use, dates, lids and rings. Any miscellaneous floor sweepings are to be placed in the accumulation drums.

The rusted dumpster has been replaced by the City of Ocala with a poly dumpster. A picture of the replacement dumpster is attached.











## LRL Response to DEP Sept 8, 2015 email

11. The following was noted outside in the compressor area.
  - a. One 35-gallon drum was staged on the asphalt exposed to the weather. A faded label on the drum indicates non-PCBs may be in the drum. Please confirm.
  - b. Four 5-gallon containers of used oil were located under cover next to the compressor. The containers were not labeled or provided secondary containment. In addition, one 5-gallon container of used oil was located in a fire cabinet next to the compressor. The container was not labeled.

### Response:

- 11.a The documentation for the 35 gallon drum with the faded label is attached. The material was received on July 30, 2015. The material was consolidated in a gaylord and sent out on August 7, 2015.
- 11.b. Used oil from the compressor has been labeled and sent out for recycling. The current oil accumulation bucket has been relocated to inside Warehouse C and placed in a containment storage bin. Pictures of the drum and containment storage bin are attached.



11a①

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number FLR000070565		2. Page 1 of 1	3. Emergency Response Phone 800-225-3924-CHEMTL	4. Waste Tracking Number GLE08072015	
		5. Generator's Name and Mailing Address LIGHTING RESOURCES LLC - FLORIDA 1007 S.W. 16TH LANE OCALA, FL 34471 352-509-3001-OFFICE		Generator's Site Address (if different than mailing address)			
Generator's Phone:		6. Transporter 1 Company Name LIGHTING RESOURCES LLC - FLORIDA				U.S. EPA ID Number FLR000070565	
		7. Transporter 2 Company Name				U.S. EPA ID Number	
8. Designated Facility Name and Site Address GREAT LAKES ELECTRONICS 280 LYMAN ROAD CASSELBERRY, FL 32707 888-392-7531						U.S. EPA ID Number MIK867893578	
Facility's Phone:							
9. Waste Shipping Name and Description		10. Containers		11. Total Quantity	12. Unit WL/Vol.		
		No.	Type				
1. PROCESSED ALUMINUM END CAPS DESTINED FOR RECYCLING		0002	CW	01425	P		
2. PROCESSED MIXED ALUMINUM & PLASTIC END CAPS DESTINED FOR RECYCLING		0005	CW	08450	P		
3. SPENT NON-PCB BALLASTS DESTINED FOR RECYCLING DOT NON-REGULATED		0004	CW	10169	P		
4.							
13. Special Handling Instructions and Additional Information 12 PALLETS - TOTAL WT - 17084 LBS							
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.							
Generator's/Offoror's Printed/Typed Name J. M. K. K. K.				Signature J. M. K. K. K.		Month Day Year 8 7 15	
15. International Shipments		<input type="checkbox"/> Import to U.S.		<input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:	
16. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name Luis Navarino				Signature L. Navarino		Month Day Year 8 7 15	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
17. Discrepancy							
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
17b. Alternate Facility (or Generator)						U.S. EPA ID Number	
Facility's Phone:							
17c. Signature of Alternate Facility (or Generator)						Month Day Year	
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a							
Printed/Typed Name				Signature		Month Day Year	



11a(2)

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <div style="text-align: center;">Not Required</div>		2. Page 1 of <div style="text-align: center;">1</div>		3. Emergency Response Phone <div style="text-align: center;">800-225-3924-CHEMTL</div>		4. Waste Tracking Number <div style="text-align: center;">350715073</div>	
		5. Generator's Name and Mailing Address <div style="text-align: center;">Lite Tech 2701 Hwy 77 Panama City, FL 32401 USA</div> Generator's Site Address (if different than mailing address)							
Generator's Phone: 850-596-2415-Terry		6. Transporter 1 Company Name <div style="text-align: center;">Lighting Resources, LLC</div>						U.S. EPA ID Number <div style="text-align: center;">FLR000070565</div>	
		7. Transporter 2 Company Name						U.S. EPA ID Number	
Facility's Phone: 352-509-3001		8. Designated Facility Name and Site Address <div style="text-align: center;">Lighting Resources, LLC (Ocala) 1007 SW 16th Lane Ocala, FL 34471 USA</div>						U.S. EPA ID Number <div style="text-align: center;">FLR000070565</div>	
9. Waste Shipping Name and Description		10. Containers No. Type		11. Total Quantity		12. Unit Wt./Vol.			
1. Discarded Mercury Containing Lamps for recycling - DOT Non-Regulated Boxes Various Sizes		15 CF		300		P			
2. Discarded Mercury Containing Lamps for recycling - DOT Non-Regulated Fiber Various Sizes		10 DF		500		P			
3. Crushed Lamps for Recycling Non-Hazardous NON PCB		1 DM DF		300		P			
4.									
13. Special Handling Instructions and Additional Information <div style="text-align: center; font-size: 1.2em;">All Materials Received Are Subject to Count &amp; Weight</div>									
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.									
Generator's/Offor's Printed/Typed Name <div style="text-align: center;">TERRY NOWACZYK</div>		Signature <div style="text-align: center;">[Signature]</div>		Month Day Year <div style="text-align: center;">12 28 15</div>					
15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.							
16. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name <div style="text-align: center;">Luis Navarro</div>		Signature <div style="text-align: center;">[Signature]</div>		Month Day Year <div style="text-align: center;">7 21 15</div>					
Transporter 2 Printed/Typed Name		Signature		Month Day Year					
17. Discrepancy									
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
17b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number									
Facility's Phone:									
17c. Signature of Alternate Facility (or Generator) Month Day Year									
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a									
Printed/Typed Name <div style="text-align: center;">Jason Muhlenberg</div>		Signature <div style="text-align: center;">[Signature]</div>		Month Day Year <div style="text-align: center;">7 30 15</div>					



11 @ 3

5507210



RECEIVED

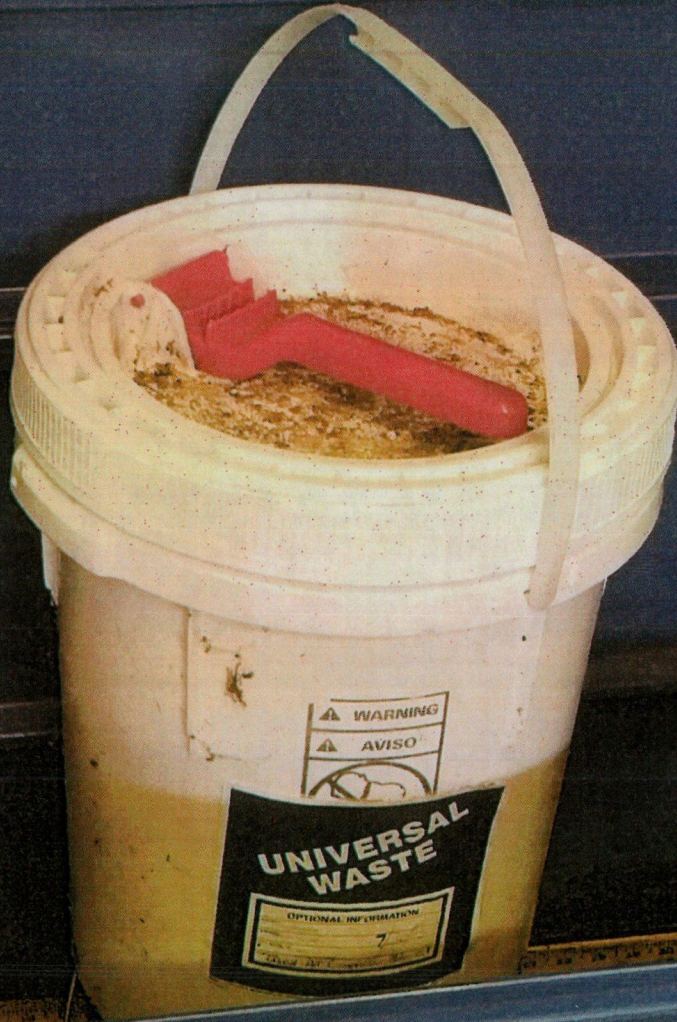
7.29.15

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number Not Required	2. Page 1 of 1	3. Emergency Response Phone 800-225-3924-CHEMTEL	4. Waste Tracking Number 560715073
5. Generator's Name and Mailing Address Lite Tech 2701 Hwy 77 Panama City, FL 32401 USA Generator's Site Address (if different than mailing address) Generator's Phone: 850-585-2416-Terry					
6. Transporter 1 Company Name Lighting Resources, LLC					U.S. EPA ID Number FLR000070565
7. Transporter 2 Company Name					U.S. EPA ID Number
8. Designated Facility Name and Site Address Lighting Resources, LLC (Ocata) 1007 SW 16th Lane Ocata, FL 34471 USA Facility's Phone: 352-609-3001					U.S. EPA ID Number FLR000070565
9. Waste Shipping Name and Description		10. Containers		11. Total Quantity	12. Unit Wt./Vol.
		No.	Type		
1. Discarded Mercury Containing Lamps for recycling - DOT Non-Regulated Boxes Various Sizes		15	CF	300	P
2. Discarded Mercury Containing Lamps for recycling - DOT Non-Regulated Fiber Various Sizes		10	DF	500	P
3. <del>Overhead Lamps</del> for Recycling Non-Hazardous NON PCB		1	DF	300	P
4.					
13. Special Handling Instructions and Additional Information All Materials Received Are Subject to Count & Weight					
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.					
Generator's/Offeror's Printed/Typed Name TERRY NOWACZYK		Signature 		Month 12	Day 28
15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:		Year 15	
Transporter Signature (for exports only):		Signature 		Month 7	Day 24
16. Transporter Acknowledgment of Receipt of Materials		Signature 		Year 15	
Transporter 1 Printed/Typed Name Luis Navarro		Signature		Month	Day
Transporter 2 Printed/Typed Name		Signature		Month	Day
17. Discrepancy					
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
Manifest Reference Number:					
17b. Alternate Facility (or Generator)					U.S. EPA ID Number
Facility's Phone:					
17c. Signature of Alternate Facility (or Generator)					Month Day Year
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a					
Printed/Typed Name		Signature		Month Day Year	



**⚠ DANGER**  
DO NOT STORE  
FLAMMABLES  
OR EXPLOSIVES!

11b①



**BETTER BUILT**  
A Division of Crown Manufacturing Co., Inc.  
**SITE SAFE**  
Optional Site Safe Accessory  
NEW! Castor Wheels



STEEL

11b(2)



**BETTER BUILT**  
**SITE SAFE**

**BETTER BUILT CONTRACTOR SERIES**

This durable steel box is strong enough to handle the extreme job site.

**Weather Resistant** **Built to Last** **On-Site Storage**

**Castor Wheels**

Castor wheels are available on all models. See the website for more information.



11b(3)

FORMATION

7/30/15

Compressor Motor Oil

(800) 327-6868

130-HML-C F



116④



**UNIVERSAL  
WASTE**

OPTIONAL INFORMATION	
SHIPPING	
LOADING RESOURCES	
ADDRESS	Box 1000, L000
CITY, STATE, ZIP	SAFT
DATE	7/30/15
Used Air Compressor Motor Oil	



## **LRL Response to DEP Sept 8, 2015 email**

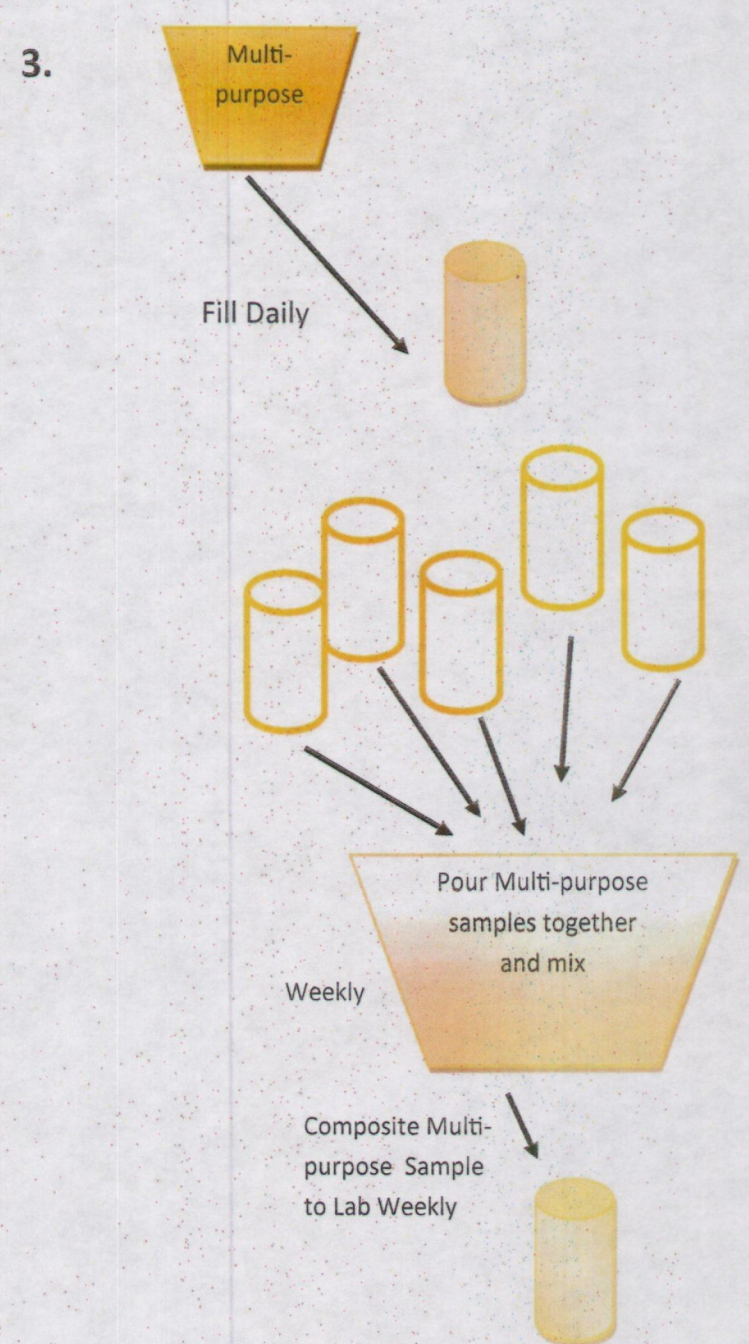
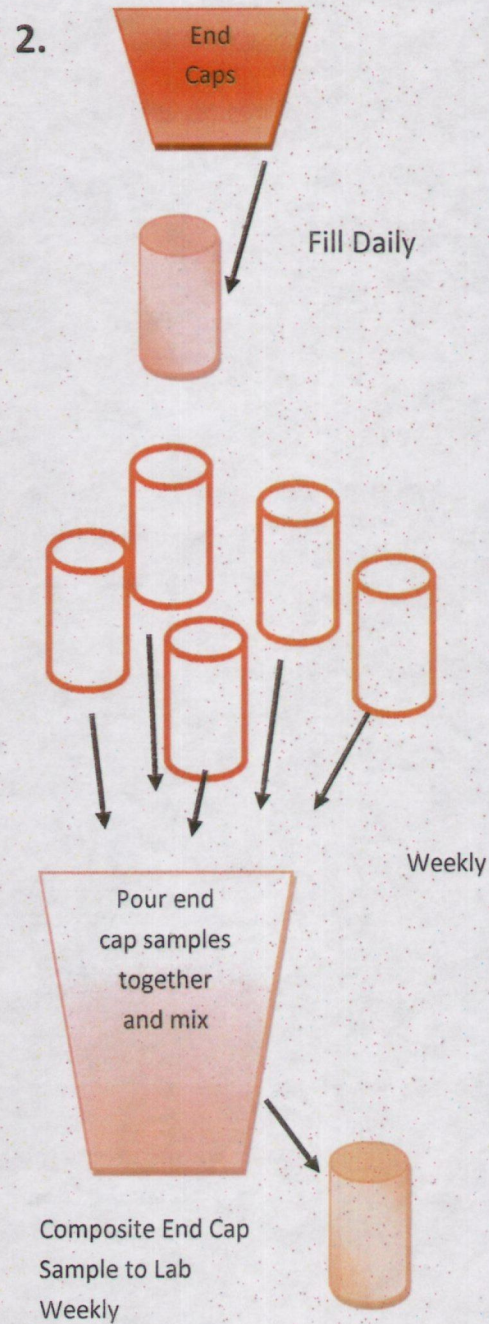
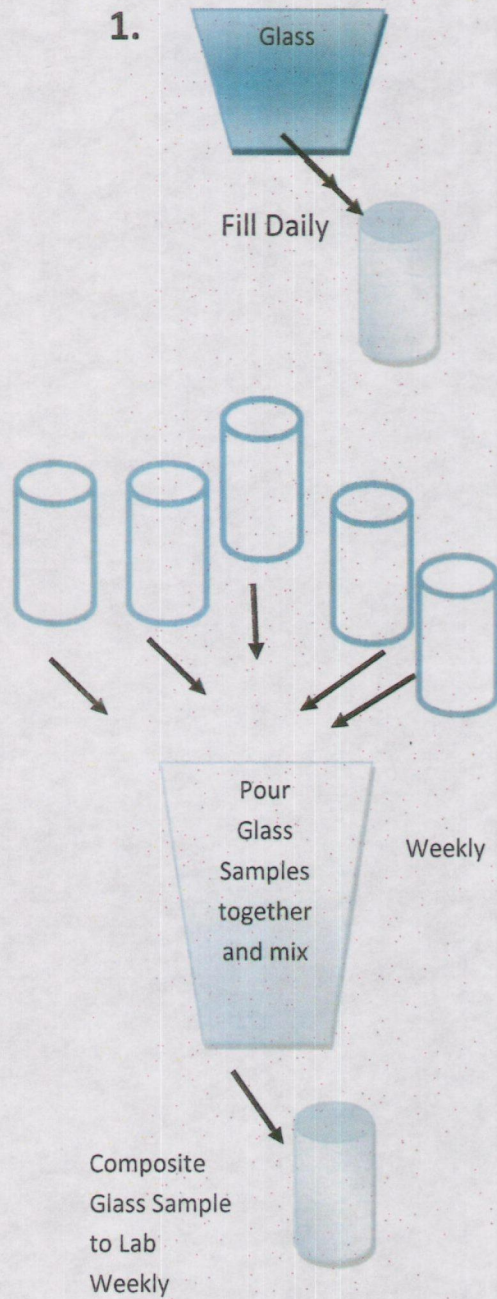
12. After conferring with permitting staff in Tallahassee, sampling and analysis of separated metals and lamp glass must be conducted per the permit. For instance, weekly composite sampling shall be conducted, not composite sampling when a dumpster is full. In addition, at least 50 grams of each sample must be collected daily in order to fulfill the 150 grams weekly sample composite requirement.

Response:

Weekly composite sampling is in effect. LRL has designed an internal document for directions with regard to how and when to conduct the sample to eliminate confusion. A copy is attached.



# Daily and Weekly Sampling Procedures





## **LRL Response to DEP Sept 8, 2015 email**

13. In the less than 90-day storage area, a label on one of the hazardous waste drums was not visible for inspection.

Response:

Training with staff has reinforced the requirement that all drum labels be aligned correctly on the pallet. In addition the aisle spacing was addressed for the purpose, again, to enable inspection of the drum labels. A current picture of generated phosphor powder (less than 90 days) is attached.







## **LRL Response to DEP Sept 8, 2015 email**

14. A portable vacuum in the lamp processing room was not labeled identifying its contents or labeled hazardous waste.

Response:

A Hazardous Waste Label, dated and named Shop Vac, has been placed on the portable vacuum in the lamp processing room. Staff training included the explanation of the requirements and logic for this label. Pictures of the vacuum and the label are attached.





Shop-Vac HAZARDOUS WASTE VAC  
FEDERAL LAW PROHIBITS UNPROPER DISPOSAL  
7/30/15  
HAZARDOUS WASTE - HANDLE WITH CARE

#14

1



Shop **HAZARDOUS WASTE** Vac

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL  
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY  
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

ACCUMULATION START DATE 7/30/15 E.P.A. WASTE NO. 0009  
D.O.T. PROPER SHIPPING NAME HAZARDOUS WASTE - SOLID & PASTE  
AND PHOSPHATE POWDER  
U.N. OR N.A. NO. 1502  
GENERATOR'S NAME UNITED RESOURCES, INC.  
ADDRESS 1007 S.W. 18TH AVE  
CITY OCALA STATE FL  
E.P.A. I.D. NO. FLR000070565  
MANIFEST TRACKING NO. \_\_\_\_\_

**HAZARDOUS WASTE - HANDLE WITH CARE**

Published by J. J. KELLER & ASSOCIATES, INC. • Menasha, WI • USA • (800) 327-4968 • www.jkceller.com

129-HML-CP 11883

142



## **LRL Response to DEP Sept 8, 2015 email**

15. The Mercon spill kit was not located on the south wall of Area B (processing room) as required in the operations plan.

Response:

The Mercon spill kit was immediately placed on the south wall of Area B (processing room) at the time of the audit.

All staff has been informed of the requirement that the Permit specifies locations off all such items and that they must remain in their assigned location. A picture of the kit located on the lockers on the south wall of Area B is attached.



15

**MERCON**

**MERCURY SPILL KIT 2**

**EMERGENCY INFORMATION**

**1-800-663-8303**

**EPS** CHEMICALS, INC.



## **LRL Response to DEP Sept 8, 2015 email**

16. Facility inspections, as required in the operations plan, should have identified unlabeled and undated containers, containers in poor condition, open containers, and aisle spacing, to name a few. What operational changes have been implemented to address this issue?

### **Response:**

LRL has completed additional training with all members of the facility with regard to procedures for labeling, dating, sorting, counting, lids, and aisle spacing. A copy of the Meeting Record Form is attached.

LRL has assigned one individual to verify that the facility is compliant with labeling, dating, lids, aisle spacing and all other regulations. He is responsible for seeing that corrections are made.

LRL has scheduled meetings with customers to reinforce the packing methods required to properly transport material to prevent/reduce crushing boxes and/or broken lamps in transport.



# Safety & Training Meeting Record Form

16①

<b>Instructor Name</b> Susan Richard	<b>Employer Name</b> Lighting Resources, LLC		
<b>Meeting Date</b> 9.23.15	<b>Location</b> 1007 SW 16 <sup>th</sup> Lane		
<b>Start / End Time</b> 2:30pm - 3:30pm	<b>City</b> Ocala	<b>State</b> FL	<b>ZIP</b> 34471

## Safety Topic Presentation

Topic Addressed	Program Leader	Length of Presentation	Discussion Comments
July 31 <sup>st</sup> Audit	Susan Richard	1 Hour	Labels, boxes, compliance, glass

## Attendance

The employees listed have satisfactorily participated and been tested per regulatory/company training requirements.

Employee Name	Position / Job Description	Employee Signature
JASON MUHLENKAMP	FACILITY MANAGER	<i>Jason Muhlenkamp</i>
SUSAN RICHARD	CH. COMPLIANCE OFF.	<i>Susan Richard</i>
BUFF FRITZ	OPERATIONS MANAGER	<i>Buff Fritz</i>
TIM GRUBAUGH	PROCESSING SUPERVISOR	<i>Tim Grubaugh</i>
KEITH SHRUM	WAREHOUSE SUPERVISOR	<i>Keith Shrum</i>
JUSTINO CALZADA	MERCURY RECOVERY PROCESS OPERATOR	<i>Justino Calzada</i>
"MAC" ELVY MCCRANIE	MERCURY RECOVERY PROCESS OPERATOR	<i>Mac McCranie</i>
"CODY" CHRIS CULBERTSON	MERCURY RECOVERY PROCESS OPERATOR	<i>Cody Culbertson</i>
AGAPITO GARCIA	MERCURY RECOVERY PROCESS OPERATOR	<i>Agapito Garcia</i>
RICHARD CRUCE	MERCURY RECOVERY PROCESS OPERATOR	<i>Richard Cruce</i>
JAMES CARMONA	MERCURY RECOVERY PROCESS OPERATOR	<i>James Carmona</i>
RICHARD DOUGLAS	MERCURY RECOVERY PROCESS OPERATOR	<i>Richard Douglas</i>
CHRIS GEIGER	MERCURY RECOVERY PROCESS OPERATOR	<i>Chris Geiger</i>

out  
seals



LUIS S. RODRIQUEZ	MERCURY RECOVERY PROCESS OPERATOR	Part Time
JUSTIN JAVIER	MERCURY RECOVERY PROCESS OPERATOR	Justin Javier
BRANDIN ZELLARS	MERCURY RECOVERY PROCESS OPERATOR	Brin E
KENNETH RIBBLE	MERCURY RECOVERY PROCESS OPERATOR	K.L.M.
BRICE HALL	MERCURY RECOVERY PROCESS OPERATOR	Brice Hall

**Employees not present for meeting:**

Richard Gruce

Luis S. Rodriguez



**LRL Response to DEP Sept 8, 2015 email**

17. Please provide a copy of each manifest, while Lighting Resources LLC was acting as a hazardous waste transporter, for the last twelve months.

Response:

The following manifests from August 1, 2014 to July 31, 2015 are attached:

- a. HW Transporter – PCB Manifests
- b. HW Transporter – Out of State crushed and other materials.