



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

FACILITY INFORMATION:

Facility Name: Lighting Resources LLC

On-Site Inspection Start Date: 07/30/2015

On-Site Inspection End Date: 07/30/2015

ME ID#: 40403

EPA ID#: FLR000070565

Facility Street Address: 1007 SW 16th Ln, Ocala, Florida 34471

Contact Mailing Address: 1007 SW 16th Ln, Ocala, Florida 34471

County Name: Marion

Contact Phone:

NOTIFIED AS:

LQG (>1000 kg/month)

Transporter

INSPECTION TYPE:

Routine Inspection for TSD Facility Unit Type(s)

Routine Inspection for LQG (>1000 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Michael Eckoff, Inspector

Other Participants: Parvez Mallick, Environmental Engineer; Glen Perrigan, Environmental Manager;
Jason Muhlenkamp, Branch Manager

LATITUDE / LONGITUDE: Lat 29° 10' 20.7785" / Long 82° 8' 49.0004"

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

TYPE OF OWNERSHIP: Private

Introduction:

On July 30, 2015, Michael Eckoff and Glen Perrigan, Florida Department of Environmental Protection, and Parvez Mallick, U.S. Environmental Protection Agency - Region IV, accompanied by Jason Muhlenkamp, Lighting Resources, LLC, inspected Lighting Resources, LLC for compliance with RCRA permit 0309339-HO-002 and, federal and state hazardous waste and used oil regulations. This was an EPA lead inspection. The narrative that follows documents observations by Department personnel. Please refer to the EPA inspection report for a final account of the inspection observations. The permit was issued on March 4, 2014 and expires on July 6, 2017. The facility most recently notified the Department on February 25, 2015 as a large quantity generator of hazardous waste, an operating commercial treatment, storage, and disposal facility, a large quantity handler of universal waste, a destination facility for universal waste, a transporter of universal waste, a mercury recovery and/or reclamation facility, and a transporter of hazardous waste, and originally received EPA ID FLR000070565 on February 17, 2011. The facility began lamp processing operations at this location on July 11, 2012.

The facility employs 22 people with operating hours from 8 AM to 5 PM, Monday to Friday, for office personnel and in two shifts from 6 AM to 11 PM, Monday to Friday, for processing personnel. The facility is connected to the municipal wastewater collection and potable water systems.

INSPECTION HISTORY

The facility was inspected in March 2014 by the Department as a result of a complaint and for compliance with its RCRA permit and federal and state hazardous waste regulations. No violations were cited at that time.

The facility was inspected in April 2013 by the Department and the U.S. Environmental Protection

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Agency - Region IV for compliance with its RCRA permit and federal and state hazardous waste regulations. This was an EPA lead inspection. The facility was out of compliance due to failure to properly notify the state and federal governments prior to receipt of hazardous waste from a foreign source, failure to train facility personnel annually, failure to maintain position descriptions, mercury containing lamps were being broken by employees in the storage area in uncontrolled conditions, failure to keep emergency coordinator information up to date, failure to properly label universal waste lamps and batteries, exceeding the permitted storage limit of phosphor powder, and weekly inspection documents were found to have been completed for future dates.

The facility was inspected in August 2012 by the Department for compliance with its RCRA permit and federal and state hazardous waste regulations. The facility was out of compliance due to failure to maintain a log documenting the 12-week rolling average, failure to provide proper signage at the facility, and failure to document weekly container inspections. The facility 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 provided the corrective actions and no further action was taken.

Process Description:

Lighting Resources, LLC is permitted to operate a mercury containing lamp and device storage and recovery facility. The storage of mercury containing lamps are limited to 139,104 T-12 lamps or 45.0 tons. Total storage of processed glass should be a maximum volume of four 20-yard roll-off containers, or 120,000 pounds (lbs), of separated glass. Total storage of processed metals should be a maximum of 45,000 lbs or sixty 55-gallon drums. Maximum storage capacity of phosphor powder should be 24,000 lbs or thirty-two 55-gallon drums.

Lighting Resources, LLC is a hazardous waste transporter, a universal waste transporter and handler, and a processor of mercury containing lamps. Universal waste coming into the facility is unloaded and placed inside the warehouse in the counting area where the number of containers described on the shipping paper is verified with the number of containers delivered by the trucking company. From there, the waste is moved to one of ten rows along the east wall of the warehouse. Universal waste batteries are stored along the north wall of the warehouse.

Incoming materials arrive in the staging area of the warehouse. Approximately 90% of the material received is transported by Lighting Resources, LLC's trucks, which consists of two semi-tractor trailers and two box trucks. Trucks are off-loaded in one of two loading docks and containers are counted or weighed to verify the shipping paper(s). Once verified, intact lamps are moved to Rows 1 through 9 in the warehouse and crushed lamps are moved to Row 10.

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.

Located in a separate room with an air filtering system and self contained, negative pressure process, is a Balcan MP8000. The Balcan MP8000 lamp processor separates the glass, end caps and phosphor powder from mercury containing lamps. The equipment can operate 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 machine handling long tubes and a second, multi-purpose machine handling crushed lamps, HID lamps, CFLs, and other miscellaneous lamps. Shatter shields are removed from bulbs in the warehouse prior to processing.

According to Mr. Muhlenkamp, the phosphor powder and mercury-containing devices are sent to Lighting Resources, LLC's Indiana facility for further processing and retort distillation and recovery, the processed glass is shipped to Argo's Newberry, Florida plant where it is used as a filler to make

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cement, and the end caps are shipped to Great Lakes' Casselberry, Florida facility for recycling. When asked, Mr. Muhlenkamp stated the purified mercury from the Indiana plant is sold to GE (General Electric).

INSPECTION NARRATIVE:

Proper signage was verified on the outside of an exit door on the south wall of the warehouse. A fire extinguisher was located on the south wall near an exit door. A tag hanging on the fire extinguisher indicated it was checked for proper operation in June 2015.

Empty lamp containers were stored in an area on the south side of the warehouse. Electronic waste was stored in 55-gallon drums and cubic-yard boxes next to the empty container area and Row 10. The cubic-yard boxes were stored three pallets high (Photo 1).

Row 10 contained forty-three 55-gallon drums of crushed lamps staged on pallets that were double-stacked. Aisle space was not provided between the drums and the cubic-yard boxes of electronic waste. This prevents the facility from documenting drums were properly labeled, marked with a received date, closed, and in good condition (Photos 1 to 3) [403.727(1)(a) and (c), Florida Statutes (F.S.)]. All the drums were not secured with shrink-wrap, bands, or other binding as required in the operating plan (Photos 1 and 2) [403.727(1)(a) and (c), F.S.]. All the labels and the received dates on the drums were either not visible for inspection or not present as required in the operating plan (Photo 2) [403.727(1)(a) and (c), F.S.]. One drum had a plywood lid secured with duct tape which is not a U.S. DOT approved container as required in the operating plan (Photo 4) [403.727(1)(a) and (c), F.S.].

Rows 3 to 7 and 9 contained pallets of universal waste lamps that were double-stacked. All the containers were not secured with shrink-wrap, bands, or other binding as required in the operating plan (Photos 1 and 5 to 8) [403.727(1)(a) and (c), F.S.]. All the labels and the received dates on the containers or pallets were either not visible for inspection or not present as required in the operating plan (Photos 5 to 7 and 9 to 11) [403.727(1)(a) and (c), F.S.]. All the containers were not closed during storage as required in the operating plan (Photos 7 and 12 to 21) [403.727(1)(a) and (c), F.S.]. All the containers were not structurally sound or adequate to prevent breakage as required in the operating plan, resulting in buckling and crushed containers, and lamp breakage (Photos 22 to 24) [403.727(1)(a) and (c), F.S., and 40 CFR 264.31]. On the west wall of the warehouse in Row 4 was a damaged electrical outlet with exposed wires.

Row 8 contained supplies including broken-down cardboard boxes.

Buff Fritz, Operations Manager, joined the inspection.

Row 2 contained universal waste batteries. All the labels on the drums, containers, or pallets were either not visible for inspection or not present as required in the operating plan (Photos 25 and 26) [403.727(1)(a) and (c), F.S.]. Batteries are shipped to Battery Solutions located in Howell, Michigan.

Row 1 contained shatter shielded universal waste lamps. All the labels and the received dates on the containers or pallets were either not visible for inspection or not present as required in the operating plan (Photos 27 to 29) [403.727(1)(a) and (c), F.S.]. All the containers were not closed during storage as required in the operating plan (Photos 28 and 29) [403.727(1)(a) and (c), F.S.]. Shatter shields are removed from the lamps in this area prior to processing. Incidental breakage occurs during removal of the shield [403.727(1)(a) and (c), F.S., and 40 CFR 264.31]. Clean up material from the breakage of lamps is placed in a 35-gallon poly drum located in Row 1. The clean up material must be managed in accordance with 62-737.840(3)(e), Florida Administrative Code (F.A.C.), and must therefore be managed as hazardous waste. The drum can be considered located in a satellite accumulation area but was not properly labeled with words identifying the contents or with the words "Hazardous Waste" (Photos 30 and 31) [403.727(1)(a), F.S., and 40 CFR 262.34(c)(1)(ii)]. The clean up material is treated in the lamp processing equipment.

In the staging area was a shipment of universal waste lamps that was awaiting sorting. Incidental breakage occurs during sorting [403.727(1)(a) and (c), F.S., and 40 CFR 264.31]. Clean up material

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from the breakage of lamps is placed in a 35-gallon poly drum located at the sorting table. The drum was labeled Universal Waste - Crushed Mercury Containing Lamps. Similar to the shatter shield processing waste above, the clean up material must be managed in accordance with 62-737.840(3)(e), F.A.C., and must therefore be managed as hazardous waste. The drum can be considered located in a satellite accumulation area but was not properly labeled with words identifying the contents or with the words "Hazardous Waste" and had an inappropriately sized lid rendering the drum open (Photo 32) [403.727(1)(a), F.S., and 40 CFR 265.173(a)]. The clean up material is treated in the lamp processing equipment.

Along the north wall of the warehouse is the mercury-containing devices storage area and the battery sorting area. Three 5-gallon containers of mercury-containing devices were properly labeled and closed. Batteries are sorted by type and placed into 55-gallon drums. Seven 55-gallon drums and four cardboard boxes of universal waste batteries were properly labeled and closed. Universal waste batteries consisted of lithium, nickel-metal hydride, nickel-cadmium, and lead-acid batteries, and also non-hazardous, non-universal waste alkaline batteries. Mr. Muhlenkamp stated terminals on all lithium-ion batteries are properly taped. Next to the drums were two containers of universal waste lamps. The containers were not labeled "Universal Waste," and not marked with the received dates as required in the operating plan (Photo 33) [403.727(1)(a) and (c), F.S.].

A less than 90-day hazardous waste storage area is located in the warehouse near the loading dock. The area is marked off with yellow tape. One 55-gallon drum of hazardous waste floor sweepings was properly labeled, marked with an accumulation start date, and closed.

Outside the battery storage area is a covered loading dock. Two cubic-yard boxes were located on the dock, one containing electronic waste and one non-PCB ballasts.

A solid waste dumpster was located outside near the two uncovered loading docks. Inside the dumpster was broken glass, metal end caps, and CFL bases (Photo 34) [403.727(1)(a) and (c), F.S., and 40 CFR 264.31]. The floor of the dumpster was rusted-through exposing the waste to the environment. Mr. Fritz immediately removed the waste from the dumpster and stated it would be placed in the drum of hazardous waste floor sweepings. Lighting Resources, LLC must determine if a release occurred and identify any new area of concern (AOC) or solid waste management unit (SWMU), as required in Part V of the permit.

Outside the northeast corner of the building was a covered area consisting of storage for propane cylinders, an air compressor, a flammable storage cabinet, and four 5-gallon containers that were not labeled. Mr. Muhlenkamp stated the containers were storing used oil from the compressor, one container was opened and verified to contain used oil. The containers were not properly labeled "Used Oil" and not provided secondary containment (Photo 35) [403.161(1)(b), F.S., 40 CFR 279.22(c)(1), and 62-710.401(6), F.A.C.]. Inside the cabinet was product and one 5-gallon container that was not labeled. Mr. Muhlenkamp stated it contained used oil from the compressor. The container was not properly labeled "Used Oil" but was provided secondary containment via the cabinet (Photo 36) [403.161(1)(b), F.S., 40 CFR 279.22(c)(1), and 62-710.401(6), F.A.C.]. Next to this area and located on asphalt was a 35-gallon drum that had a faded non-PCB ballast label. Mr. Muhlenkamp was asked to verify the contents.

On the northeast side of the property were three semi-tractor trailers. Mr. Muhlenkamp stated one contained electronic waste and batteries, one contained supplies including broken-down cardboard boxes, and the last was empty. The supply trailer was open. Two 5-gallon containers that were not labeled and appeared to contain liquid were noted in the trailer (Photo 37). When asked, Mr. Muhlenkamp stated he did not know what was in the containers. The containers were removed from the trailer and placed on the covered loading dock next to the two cubic-yard boxes. A sticker on the lid of one container identified Crystal Clean but had no further information. Lighting Resources, LLC failed to follow waste rejection procedures outlined in the operating plan [403.727(1)(a) and (c), F.S.].

In the processing room, Mr. Muhlenkamp described the Balcan MP8000 lamp processor's operation.

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A bailer was located along the west wall and is used to consolidate cardboard boxes.

Under each of the two air filtration devices was a 55-gallon drum of hazardous waste phosphor powder. The drums were properly labeled, marked with an accumulation start date, and sealed to the filters rendering them closed. Next to the filters was a portable vacuum that was not labeled and the wand on the end of the hose was open (Photo 38) [403.727(1)(a), F.S., 40 CFR 262.34(c)(1)(ii), and 40 CFR 265.173(a)]. Mr. Muhlenkamp stated it is used for emergency clean up.

A cubic-yard box contained metal end caps separated from lamps and a hopper contained processed glass. A second cubic-yard box contained CFL end caps processed by the multi-purpose machine. Daily samples are collected from these three containers. The daily samples were stored in small glass jars located inside plastic containers. The plastic containers were on top of the unit that dispenses the metal end caps and processed glass into the appropriate containers.

A less than 90-day hazardous waste storage area is located in the processing room along the south wall. Twenty-six 55-gallon drums of hazardous waste phosphor powder were properly labeled, marked with an accumulation start date, and closed. Two of the drums were dented [403.727(1)(a), F.S., 40 CFR 265.171, and 62-730.160(5), F.A.C.]. The label on one 55-gallon drum of hazardous waste phosphor powder was not visible for inspection [403.727(1)(a), F.S., and 62-730.160(5), F.A.C.]. Adjacent to this area along the east wall was one 55-gallon drum of hazardous waste spent PPE that was properly labeled, marked with an accumulation start date, and closed. Next to this drum were two drums of metal end caps that will be run back through the lamp processor. The end caps exited the lamp processor through an overflow to avoid jamming the machine. A drum was placed under the overflow to catch end caps actively exiting the machine. These too will be run back through the lamp processor.

According to the operating plan a mercury spill kit must be located on the south wall near the door to the warehouse. The spill kit was missing [403.727(1)(a) and (c), F.S.]. Mr. Muhlenkamp questioned a technician working in the area, the spill kit was eventually found and placed in the proper location.

In the glass and metal end cap storage area were three roll-off containers for processed glass identified as C1, C2, and C3. C1 contained glass, and C2 and C3 were empty. A log book is maintained that identifies the volume of processed glass and which container it went into. The log showed 14,529 pounds of glass was generated in two days. Metal end caps are stored in cubic-yard boxes. No metal end caps were in storage at the time of the inspection. A cubic-yard box of CFL end caps processed by the multi-purpose machine was awaiting disposal, the daily samples were being composited then sent for analysis. Electronic scrap was stored in four cubic-yard boxes and on two pallets. Shields removed from the lamps were stored along the north wall.

A solid waste trash can was located near a bay door. Inside the trash can was metal end caps, spent PPE and used rags [403.727(1)(a) and (c), F.S., and 40 CFR 264.31]. Mr. Fritz immediately removed the trash can from the area and stated the contents would be placed in the drum of hazardous waste floor sweepings.

RECORDS REVIEW:

Records reviewed included disposal manifests, weekly inspection logs for accumulation containers, weekly and 12-month rolling average mercury analyses for spent materials, training records and contingency plan.

Jamie Shortt was listed as an alternate emergency coordinator in the contingency plan. Mr. Muhlenkamp stated Mr. Shortt no longer works for the facility [403.727(1)(a) and (c), F.S., and 40 CFR 264.54(d)].

Position descriptions were not available for review [403.727(1)(a) and (c), F.S., and 40 CFR 264.16(d)].

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Freehold Cartage is the hazardous waste transporter and Lighting Resources (IND000351387), Greenwood, Indiana, is the designated facility for wastes shipped off-site for recycling.

End caps are recycled as scrap metal through Trademark Metals Recycling and glass is sent to the Argo's Newberry Plant, Newberry, Florida. Phosphor powder is shipped off-site every two weeks to Lighting Resources facility in Indiana for retort distillation and recovery.

Sample analysis records were reviewed for metal end caps, processed glass, and CFL bases. Mr. Muhlenkamp stated daily samples of metal ends caps, processed glass, and CFL bases are collected from the containers below the dispensers, and when a dumpster is full, generally in three days time, the samples are composited and sent for analysis [403.727(1)(a) and (c), F.S.]. Samples of metal end caps, processed glass, and CFL bases must be collected each operating day and composited and analyzed weekly for mercury as described in the permit. Mercury content must be less than 1 part per million (ppm) "average" for a twelve week running average and less than 3 ppm for any weekly composite. When asked, Mr. Muhlenkamp could not provide records documenting the minimum daily sample size of 50 grams or the minimum weekly composite sample size of 150 grams [403.727(1)(a) and (c), F.S.].

Results for sampling that was conducted in April 2015 at Lighting Resources, LLC's Indiana facility to demonstrate 99% mercury reclamation were reviewed. The results indicate 100% of the mercury was reclaimed by the facility.

Sample analysis records were not available for shatter shields [403.727(1)(a) and (c), F.S., and 40 CFR 262.11].

No waste rejection logs were available for review. Mr. Muhlenkamp stated no loads have been rejected. As noted above, the facility failed to follow waste rejection procedures for the two 5-gallon containers of unidentified liquid waste stored in the supply trailer.

A review of the daily inspection logs revealed all required information was not listed, i.e., aisle space, container condition, container closures, and containers dated, to name a few, as required by the operations plan [403.727(1)(a) and (c), F.S.].

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.11, 403.727(1)(a)
Explanation:	<p>A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste.</p> <p>Specifically, Lighting Resources, LLC failed to conduct a proper waste determination on shields removed from lamps.</p>
Corrective Action:	EPA is the lead agency for formal enforcement action.

Type:	Violation
Rule:	262.34(c)(1), 262.34(c)(1)(ii), 403.727(1)(a)
Explanation:	<p>A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in 261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section provided he marks his containers either with the words "Hazardous Waste" or</p>

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with other words that identify the contents of the containers.

Specifically, Lighting Resources, LLC failed to properly label a 35-gallon poly drum and a portable vacuum.

Corrective Action: EPA is the lead agency for formal enforcement action.

Type: Violation

Rule: 264.16(d), 264.16(d)(1), 264.16(d)(2)

Explanation: The owner or operator must maintain the following documents and records at the facility: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; and a written job description for each position listed under paragraph (d)(1) of this section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of employees assigned to each position.

Specifically, Lighting Resources, LLC failed to maintain position descriptions.

Corrective Action: EPA is the lead agency for formal enforcement action.

Type: Violation

Rule: 264.31, 403.727(1)(a)

Explanation: Design and operation of facility. Facilities must be designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Specifically, Lighting Resources, LLC had releases as a result of:

Incidental breakage while removing shields from lamps and sorting incoming lamps;
Buckled and crushed containers; and

Disposing broken glass, metal end caps, CFL bases, spent PPE, and used rags in the regular trash.

Corrective Action: EPA is the lead agency for formal enforcement action.

Type: Violation

Rule: 264.54, 264.54(d), 403.727(1)(a)

Explanation: The contingency plan must be reviewed, and immediately amended, if necessary, whenever the list of emergency coordinators changes.

Specifically, Lighting Resources, LLC failed to amend the contingency plan when the list of emergency coordinators changed.

Corrective Action: EPA is the lead agency for formal enforcement action.

Type: Violation

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Rule: 265.171, 403.727(1)(a)

Explanation: If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this part.

Specifically, Lighting Resources, LLC failed to transfer hazardous waste from containers that were not in good condition to containers that are in good condition.

Corrective Action: EPA is the lead agency for formal enforcement action.

Type: Violation

Rule: 265.173(a), 403.727(1)(a)

Explanation: A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

Specifically, Lighting Resources, LLC failed to keep a 35-gallon poly drum and a portable vacuum closed during storage.

Corrective Action: EPA is the lead agency for formal enforcement action.

Type: Violation

Rule: 279.22(c)(1), 403.161(1)(b), 62-710.401(6)

Explanation: No person may store used oil in tanks or containers unless they are clearly labeled with the words "used oil" are in good condition (no severe rusting, apparent structural defects or deterioration), and not leaking (no visible leaks). If tanks or containers are not stored inside a structure, the contents shall be closed, covered or otherwise protected from the weather. If tanks or containers are not double-walled, they shall be stored on an oil-impermeable surface such as sealed concrete or asphalt, and must have secondary containment which has the capacity to hold 110% of the volume of the largest tank or container within the containment area.

Specifically, Lighting Resources, LLC failed to properly label containers of used oil and provide containers of used oil with secondary containment.

Corrective Action: EPA is the lead agency for formal enforcement action.

Type: Violation

Rule: 403.727(1)(a), 403.727(1)(c)

Explanation: It is unlawful for any hazardous waste generator, transporter, or facility owner or operator to fail to comply with a permit.

Specifically, Lighting Resources, LLC failed to:

- Provide adequate aisle space;
- Secure containers with shrink-wrap, bands, or other binding;
- Label containers or make labels visible for inspection;
- Mark containers with a received date or make date visible for inspection;
- Use U.S. DOT approved containers;

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Maintain containers closed during storage;
Minimize the possibility of releases of hazardous waste;
Follow waste rejection procedures;
Ensure emergency equipment was properly located;
Ensure the list of emergency coordinators was current in the contingency plan;
Maintain position descriptions;
Follow proper sampling procedures for metal end caps, processed glass, and CFL bases;
Document that the minimum sample size was being collected;
Maintain records for shatter shields analysis; and
List all required information in the daily inspection logs.

Corrective Action: EPA is the lead agency for formal enforcement action.

Type: Violation

Rule: 403.727(1)(a), 62-730.160(6)

Explanation: As of April 23, 2013 this regulation has been changed to 62-730.160(5)

Generators of hazardous waste who accumulate hazardous waste on-site under 40 CFR 262.34, shall maintain written documentation of the inspections required under 40 CFR Part 265. The generator shall keep the written documentation of the inspections under this section for at least three years from the date of the inspection. At a minimum, this documentation shall include the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

Specifically, Lighting Resources, LLC failed to document in the weekly inspection logs two containers of hazardous waste that were not in good condition and a label on one of the drums was not visible.

Corrective Action: EPA is the lead agency for formal enforcement action.

PHOTO ATTACHMENTS:

Photo 1 - E-waste, drums of crushed lamps, and boxes of lamps



Photo 2 - Drums of crushed lamps



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Photo 3 - Drums of crushed lamps



Photo 4 - Drum of crushed lamps



Photo 5 - Boxes of lamps



Photo 6 - Boxes of lamps



Photo 7 - Boxes of lamps



Photo 8 - Boxes of lamps



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Photo 9 - Boxes and bags of lamps



Photo 10 - Containers of lamps



Photo 11 - Universal waste label



Photo 12 - Boxes of lamps



Photo 13 - Boxes of lamps



Photo 14 - Boxes of lamps



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Photo 15 - Boxes and containers of lamps



Photo 16 - Containers of lamps



Photo 17 - Boxes of lamps



Photo 18 - Boxes of lamps



Photo 19 - Boxes of lamps



Photo 20 - Boxes of lamps



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Photo 21 - Containers of lamps



Photo 22 - Boxes of lamps



Photo 23 - Boxes of lamps



Photo 24 - Boxes of lamps



Photo 25 - Drums of batteries



Photo 26 - Drums of batteries



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Photo 27 - Containers of shatter shielded lamps



Photo 28 - Containers of shatter shielded lamps



Photo 29 - Containers of shatter shielded lamps



Photo 30 - Drum of clean up material



Photo 31 - Back side of drum in Photo 30



Photo 32 - Drum of clean up material



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Photo 33 - Boxes of lamps under radio and drums of batteries



Photo 34 - Contents of solid waste dumpster



Photo 35 - Containers of used oil



Photo 36 - Container (black) of used oil



Photo 37 - Containers with unknown liquid moved to loading dock



Photo 38 - Portable vacuum



Conclusion:

Lighting Resources, LLC was inspected as a mercury processor, a large quantity generator of hazardous waste, and a universal and hazardous waste transporter, and was not in compliance at that time.

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Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Michael Eckoff

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**Supervisor:**Nathan Hess

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.