

Eckoff, Michael

From: Eckoff, Michael
Sent: Wednesday, September 16, 2015 8:17 AM
To: Jason Muhlenkamp
Cc: Mallick, Parvez
Subject: RE: Lighting Resources LLC - RCRA Inspection - July 30, 2015

Hello Mr. Muhlenkamp,

Let's start with the past twelve months of manifests that Lighting Resources acted as the transporter.

Thank you,
Michael

From: Jason Muhlenkamp [mailto:jason.muhlenkamp@lightingresourcesinc.com]
Sent: Monday, September 14, 2015 9:58 AM
To: Eckoff, Michael <Michael.Eckoff@dep.state.fl.us>
Cc: Mallick, Parvez <Mallick.Parvez@epa.gov>
Subject: RE: Lighting Resources LLC - RCRA Inspection - July 30, 2015

Good morning Michael,

We are working on getting all of this information to you. I do have 1 question. On the manifests you ask for all manifests that we were the transporter. Do you want all manifests or just PCB manifests? We also have crushed lamps that comes in from out of state that travels on a hazardous waste manifest. Thanks

Jason Muhlenkamp
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From: Eckoff, Michael [mailto:Michael.Eckoff@dep.state.fl.us]
Sent: Tuesday, August 18, 2015 11:16 AM
To: Jason Muhlenkamp
Cc: Mallick, Parvez; Perrigan, Glen; Hess, Nathan
Subject: Lighting Resources LLC - RCRA Inspection - July 30, 2015

Hello Mr. Muhlenkamp,

Thank you for your time during the inspection of your facility. Below is a list of preliminary potential issues noted during the inspection and requests for further information.

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?
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.
3. Please provide information regarding the content of a typical monthly safety meeting.
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.
5. An alternate emergency coordinator was listed in the contingency plan that no longer works at the facility.
6. Aisle space was not provided between the e-waste storage and the crushed lamp drums in row 10.
7. Not all universal waste batteries containers were labeled.
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. The drum was not labeled.
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 poly drum. The cover on the drum was not appropriately sized rendering the drum open.
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.
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.
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.
13. In the less than 90-day storage area, a label on one of the hazardous waste drums was not visible for inspection.
14. A portable vacuum in the lamp processing room was not labeled identifying its contents or labeled hazardous waste.
15. The mercon spill kit was not located on the south wall of Area B (processing room) as required in the operations plan.
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?
17. Please provide a copy of each manifest, while Lighting Resources LLC was acting as a hazardous waste transporter, for the last twelve months.

There are a few more observations we need to discuss internally but I wanted to get you something. If you have any questions please contact me or Mr. Mallick.

Thank you,

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