

## LIGHTING RESOURCES, LLC

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April 12, 2016

**RECEIVED**

APR 18 2016

**DEP Central District**

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Environmental Engineer  
RCRA and OPA Enforcement & Compliance Branch  
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Atlanta, GA 30303

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Dear Mr. Mallick:

This letter is the response to the FL Dep Inspection Report of July 31, 2015 received from Mr. Michael Eckoff on February 22, 2016 via email.

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. In addition to the inspection reports and training outlined in the permit, Lighting Resources selects an individual to conduct the daily compliance walk to oversee an inspection of the facility. The employee and the supervisor are responsible to

see that staff corrects any outstanding items. This training method 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. This includes changes to procedures as noted in this response that material in crushed containers upon receipt will be emptied to fiber drums.

Attached are all items listed in the inspection report along with the actions taken, along with supporting documentation and/or pictures. 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. In addition, specific pages or forms have been produced with current information.

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. The Florida Department of Environmental Inspection Report will be reviewed and studied in future safety meetings along with this response. Although the employees are trained on a regular basis, this will again provide the opportunity to demonstrate exactly what is required and why and how to continue to improve the operations of facility.

Sincerely,

  
Susan Richard  
Chief Compliance Officer

  
Jason Muhlenkamp  
Florida Branch Manager



Inspection Narrative:

- I. Row 10 contained forty-three 55-gallon drums of crushed lamps staged on pallets that were double-stacked. **(A)** 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.)]. **(B)** 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.]. **(A)** 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) (A) [403.727(1)(a) and (c), F.S.]. **(C)** 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.]

- A. The aisle space at both ends was cleared at the time of the audit. This allowed the labels to be accessible. This also allowed the inspectors at the time of the audit, to verify the received date, see that the material was closed and also in good condition.

Additional stripping has been added to Row 1 and Row 10 to designate the aisle space at both rows. This will allow the labels on the drums to be visible from both sides of the rows. This also allows the staff to verify the received date, see that they are closed, and in good condition. [Photo 1, 2,]

- B. Lighting Resources has retrained the staff that all pallets of drums are to be shrink-wrapped with labels facing outward. [Photo 3]
    - C. The drum with the plywood-lid was shipped to Lighting Resource in that condition. It was received the prior evening. The lid was replaced with a lid and ring during the audit.
- II. Rows 3 to 7 and 9 contained pallets of universal waste lamps that were double-stacked. **(A)** 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.]. **(B)** 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.]. **(C)** 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.]. **(D)** 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]. **(E)** On the west wall of the warehouse in Row 4 was a damaged electrical outlet with exposed wires.
- A. Pallets of boxes and drums were secured with additional shrink-wrap bands at the time of the audit. [Photo 4]

- B. Pallets with material needing Bill of Ladings and/or Universal Waste labels were attached to the pallets at the time of the audit.
  - C. Any containers that were open were closed during the audit.
  - D. Lighting Resources has modified the procedures to remove the material from containers that are not structurally sound upon receipt to fiber drums with lids and attach the bill of lading and labeling as appropriate.
  - E. The damaged electrical outlet with exposed wires did not have power at the time of the audit or thereafter. All outlets on the wall along with the conduit have been removed. [Photo 5-7]
- III. Row 2 contained universal waste batteries. **(A)** 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.
- A. The drum with a label not visible was turned during the audit to display the label. A label was added to the other drum without a label.
- IV. Row 1 contained shatter shielded universal waste lamps. **(A)** 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.]. **(B)** 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. **(C)** 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.
- A. All fiber drums were closed and labeled at the time of the audit. Since shatter shields are received mixed in with regular lamps, they are transferred to separate fiber drums to be processed. [Photo 2, 4] This means that multiple customers shatter shield lamps are included in the fiber drums and a bill of lading is no longer valid for the container. Although these lamps are Universal Waste the material is no longer in customer containers. Lighting Resources has modified procedures to include a label that shows the material as Universal Waste LRL Shattershield Lamps in Progress with the date it was started. [Photo 8]
  - B. At the time of the audit, all drums were closed and labeled and covered during the audit. As Row 1 is designated as Shattershield staging area with all fiber drums closed, the poly drum has been replaced with a white accumulation bucket with a lid.. [Photo 9]
  - C. As incidental breakage does occur during shattershield processing, the white bucket has been designated as the Hazardous Waste Accumulation



Bucket for broken material that will be processed in the Balcan. It is labeled Hazardous Waste and has the start date along with a lid. [Photo 10]

- V. In the staging area was a shipment of universal waste lamps that was awaiting sorting. **(A)** Incidental breakage occurs during sorting [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 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. **(B)** 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.
- A. As incidental breakage does occur during sorting, a white bucket has been designated as the Hazardous Waste Accumulation Bucket for broken material that will be processed in the Balcan. [Photo 9-10]
- B. The lid was replaced on the drum at the time of the audit. The Hazardous Waste Accumulation Bucket for broken or crushed lamps is labeled as an Accumulation Bucket with the start date and the Hazardous Waste Label. This bucket has a correctly fitting lid and replaced the previous drum. [Photo 9-10]
- VI. 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. **(A)** 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. The containers were labeled and the material moved to be processed.
- VII. A solid waste dumpster was located outside near the two uncovered loading docks. **(A)** 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. **(B)** 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.

- A. The materials in the dumpster were immediately removed during the audit. The materials (glass, end caps and CFL lamp bases) were placed in the Hazardous Waste accumulation drum. The material recovered from the dumpster was material swept up in the covered canopy area from gaylords of the material that were transferred from Warehouse C to the loading dock. The material is routinely tested and is non-hazardous (Gaylords of End Caps and multipurpose materials.) The rusted metal dumpster was replaced with a poly-dumpster by the City of Ocala. [Photo 11]
  - B. As verification that there was no contamination of mercury, Lighting Resources reviewed the Jerome Meter readings for that area and that date. A report of the readings for that area during the period of the audit is attached. [Exhibit 1]. The dumpster is located adjacent to the loading docks. Rain water is collected at the bottom of the truck well in a sump pump collection tank. A water sample was taken from the tank and was sent for testing. The results were returned .098 ppm. The copy of the analyticals is attached. [Exhibits 2-3] Both results reflect a mercury level below threshold with no exposure to the environment. Therefore, there was no release or any new area of concern (AOC) or solid waste management unit (SWMU).
- VIII. 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. **(A)** 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.]. **(B)** 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.]. **(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.
- A. The containers of used oil from the compressor were labeled and relocated to a secondary containment location. [Photos 12 -13] The material was sent out for used oil recycling.
  - B. The container of used oil from the compressor located in the fire cabinet was labeled at the time of the audit. The material was sent out for used oil recycling.
  - C. The container with the faded label was opened and it was verified that it contained non-PCB ballasts. The material had been received on the day of the audit, July 30, 2015. It was moved to the sorting and accumulation area for non-PCB ballasts. The material was consolidated in a gaylord and sent out on August 7, 2015. Paperwork showing the incoming material is attached. [Exhibit 6] Paperwork showing the outgoing material is attached. [Exhibit 7]



IX. 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. **(A)**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.].

A. 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 was 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 documents Lighting Resources created to return the buckets to the customer. [Exhibits 8-9] A picture of the labeled drums is attached. [Photo 14]

Training in regard to the specific procedures for rejecting a load was reviewed with staff at the Safety meeting on September 23, 2015. [Exhibits 1-12] Additionally, the contents of this response will be reviewed at future Safety meetings in the coming months.

We have taken several steps to implement rules and procedures to better 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. [Exhibit 10] 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 to them. The Reject form and log are completed by the office and kept for future reference. The return document is created for the driver. Sample copies are attached. The current Reject Log is also attached to show what has been rejected since September 2015. [Exhibit 13]

If a common carrier/customer truck attempts to deliver material that is unacceptable, it is rejected immediately and returned with the driver.

X. 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. **(A)** 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. A Hazardous Waste Label, dated and named Shop Vac, was placed on the portable vacuum in the lamp processing room. [Photos 15-16] Staff training included the explanation of the requirements and the logic for this label. As the vacuum is located in the Balcan processing room, any residual vapors from the vacuum are drawn into the Balcan Air Master filters. [Photo 16]
- XI. 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. **(A)** Two of the drums were dented [403.727(1)(a), F.S., 40 CFR 265.171, and 62-730.160(5), F.A.C.]. **(B)** 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.].
  - A. Lighting Resources verifies that all drums are not severely rusted, leaking, bulging, or compromised, and that the lid and ring seal properly prior to using.
  - B. The drum was adjusted to have the label visible at the time of the audit.
- XII. According to the operating plan a mercury spill kit must be located on the south wall near the door to the warehouse. **(A)** 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.
  - A. The spill kit was located on a different wall in the Balcan room. It was relocated to the proper location. [Photo 18]
- XIII. A solid waste trash can was located near a bay door. **(A)** 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.
  - A. The spent PPE and used rags were in an internal trash can and had not been disposed of in the dumpster. When the trash can was emptied, the processor would have disposed of it in the Hazardous Waste Accumulation drum.
  - B. In addition to the solid waste trash can in Warehouse C, an accumulation drum for spent PPE and floor sweepings has been located near the lockers. [Photo 18]

#### RECORDS REVIEW:

- XIX. 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 (A) 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)].

A. The Contingency plan was updated with the current employees. A Class 1 Modification was sent to the Florida Department of Environmental Protection with changes as required. [Exhibits 14-15]

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

A. All these documents were available at the time of the audit. The Manager knew they were in the permit but missed finding them as he paged through the permit..

B. This information is located in the permit. in the facility conference room A current updated list is attached. [Exhibit 16, 17, 18]

XXI. 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.]. **(A)** 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. **(B)** 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.].

A. The Operation Plan Engineering Report Section **3.11 Final Destination of Materials** states : Separated lamp glass material is shipped out as often needed. At a minimum weekly analytical testing is done on a composite of the daily samples of separated lamp glass (cullet) collected the prior week. This specific detail was added to allow more frequent testing to prevent an interruption in the processing schedule.

B. However, upon receipt of the informal email notification of this issue, Lighting Resources began weekly composite sampling in September 2015.

C. In addition, Lighting Resources has designed two internal documents for the sampling procedures. The first shows directions with requirements as to how, when, and how much material is required to conduct a sample. The second is a log of date, material, and weight of the daily sample and the weekly composite sample. [Exhibits 19-20]

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

A. The Branch Manager had prior knowledge of previous testing done when he was stationed in Indiana. The Florida material was sent for shatter shield testing. The

results indicate that the material is below the threshold and is non-hazardous material. [Exhibits 4-5]

- XVIII. No waste rejection logs were available for review. Mr. Muhlenkamp stated no loads have been rejected. **(A)** 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. The waste rejections are tracked using the Load Rejection Log located in the permit. We have taken several steps to implement rules and procedures to better 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 to them. The Reject log is completed by the office and kept for future reference. The return document is created for the driver. Sample copies are attached. The current Reject Log is also attached to show material that has been rejected to date. [Exhibits 10, 13]

If a common carrier/customer truck attempts to deliver material that is unacceptable, it is rejected immediately and not received.

Training in regard to the specific procedures for rejecting a load were reviewed with staff at the Safety meeting on September 23, 2015. [Exhibits 11-12] Additionally, the contents of this response will be reviewed at future Safety meetings in the coming months.

- XIX. A review of the daily inspection logs **(A)** 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.].
- A. Supervisors and staff have reviewed the forms and completion guidelines required for each area. Additional training also involved the specifics of all items noted in this Inspection Report along with additional random audits by the Branch Manager and Operations Manager and Corporate Managers.



Photo 1. Aisle 10 Spacing and shrink-wrapped pallets.



Photo 2. Aisle 1 Spacing with Boxes and Shattershields shrink wrapped.





Photo 3 Aisle 10, Labels, and Drums Shrink Wrapped



Photo 4  
Shrink Wrapped Fiber Drums





Photo 5 – Wall Electrical Outlet



Photo 6 – Wall Electrical Outlets removed





Photo 7 – Electrical Outlets and Conduit Removed





Photo 8 –Shattershield LR Labels

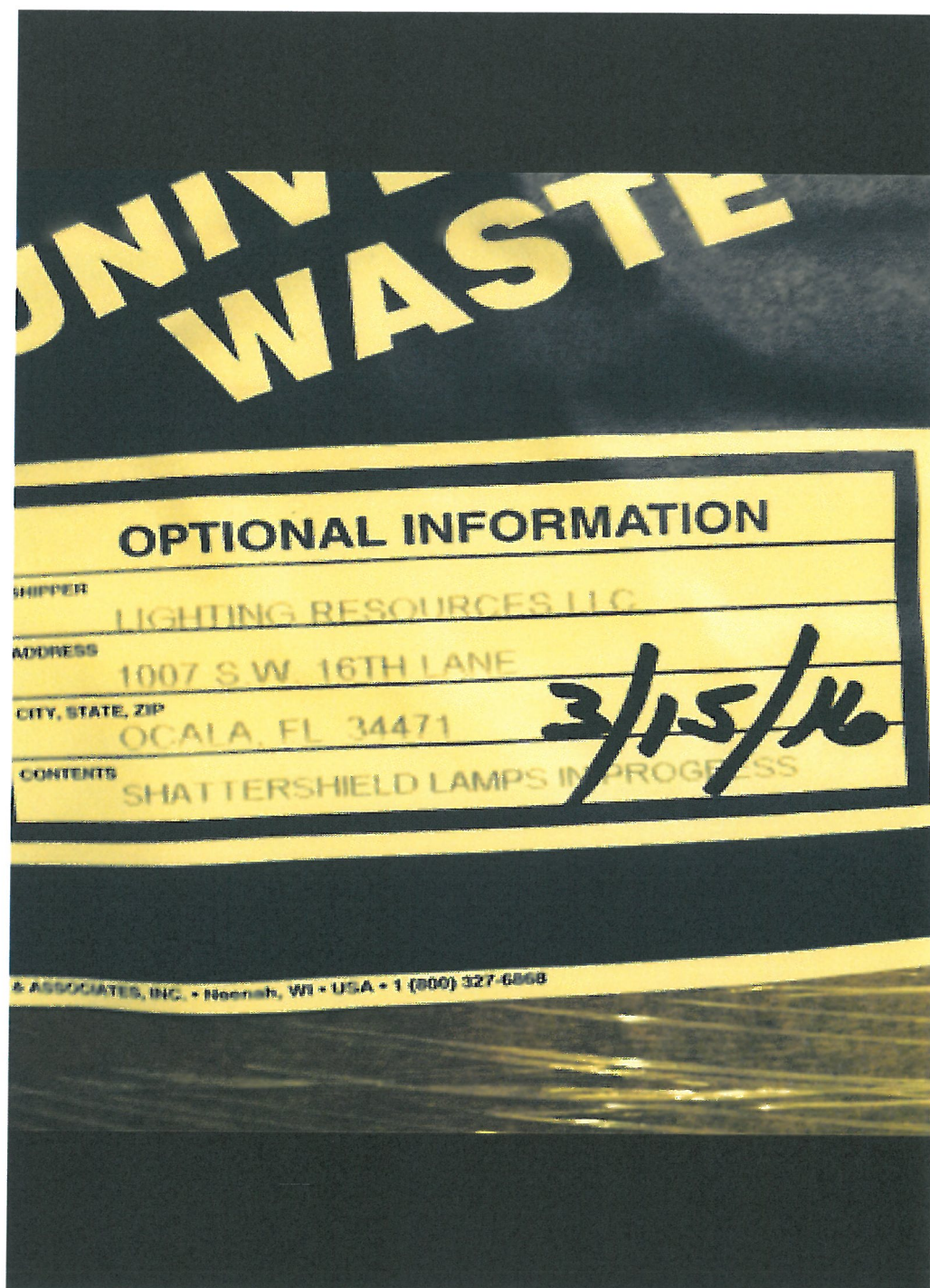




Photo 9 –Shattershield Incidental Breakage Hazardous  
Waste Bucket

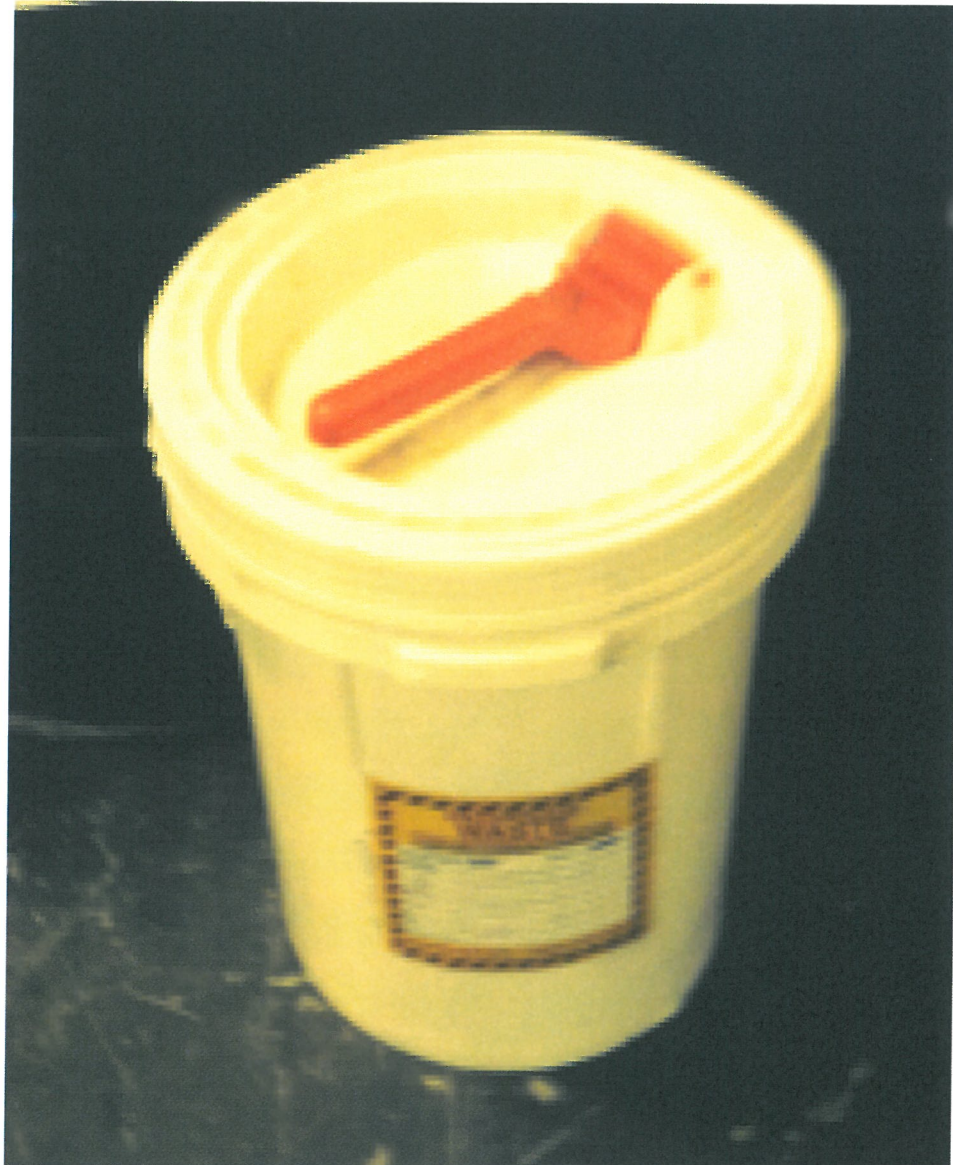


Photo 10 – White Bucket Accumulation Drum Label for  
Incidental Breakage.

HAZARDOUS WASTE	
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	4.1.2016
E.P.A. WASTE NO.	DD09
D.O.T. PROPER SHIPPING NAME	NA3077, RQ, HAZARDOUS WASTE
AND	SOLID, N.O.S., CLASS 9, PG III, ERG 172
U.N. OR N.A. NO.	NA3077 (Incidentally Broken Lamps)
GENERATOR'S NAME	LIGHTING RESOURCES LLC
ADDRESS	1007 SW 16th LANE
CITY	OCCALA
STATE	FLORIDA
E.P.A. I.D. NO.	FLR000070565
MANIFEST TRACKING NO.	
HAZARDOUS WASTE – HANDLE WITH CARE	

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Photo 11 – Poly Dumpster Replacement

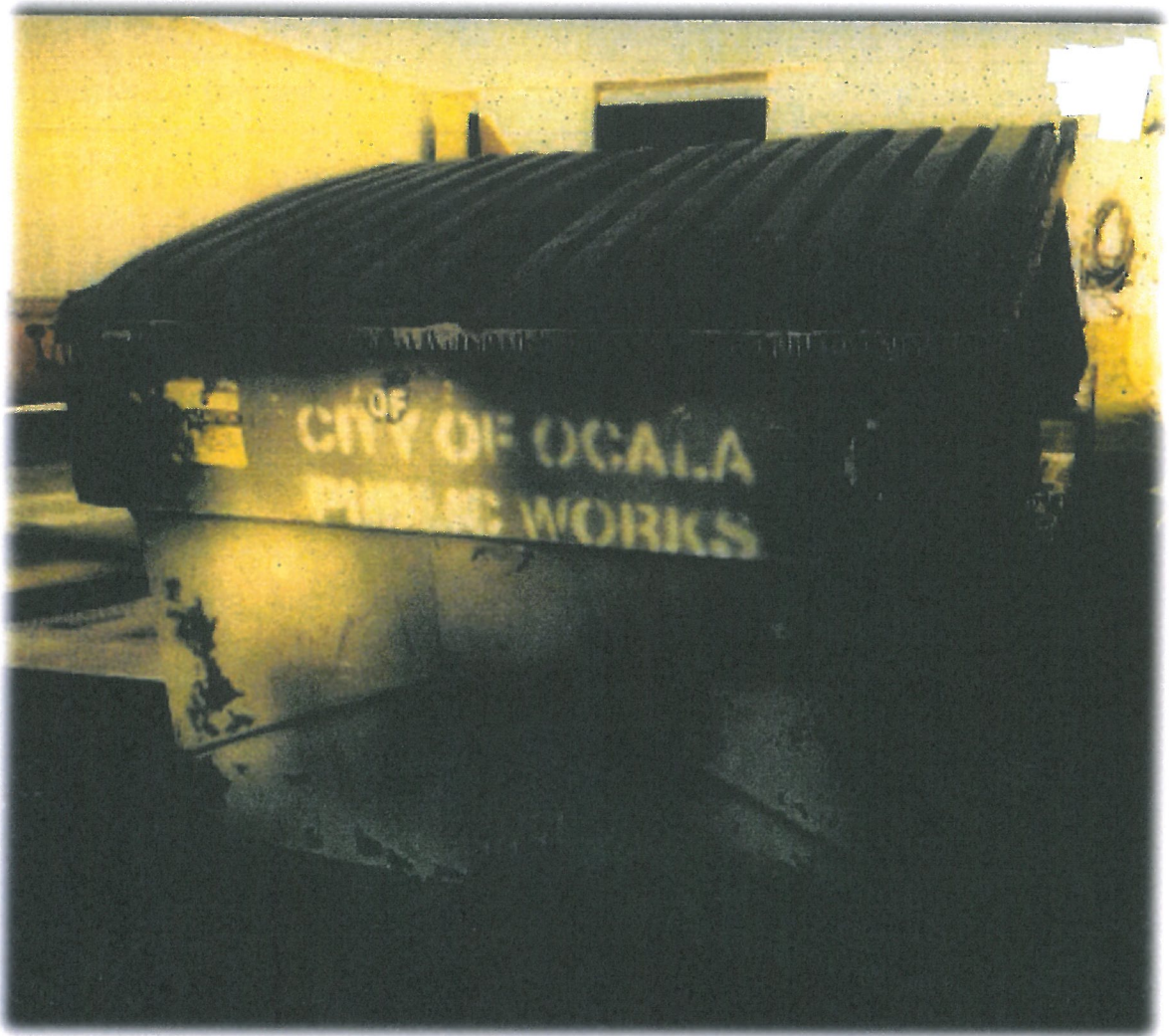


Photo 12 – Used Oil in Secondary Containment in Warehouse C.





Photo 13 –Used Oil Labeled



Photo 14 – Rejected Drums of Liquid





Photo 15 – Shop Vacuum



Photo 16 – Shop Vacuum Label

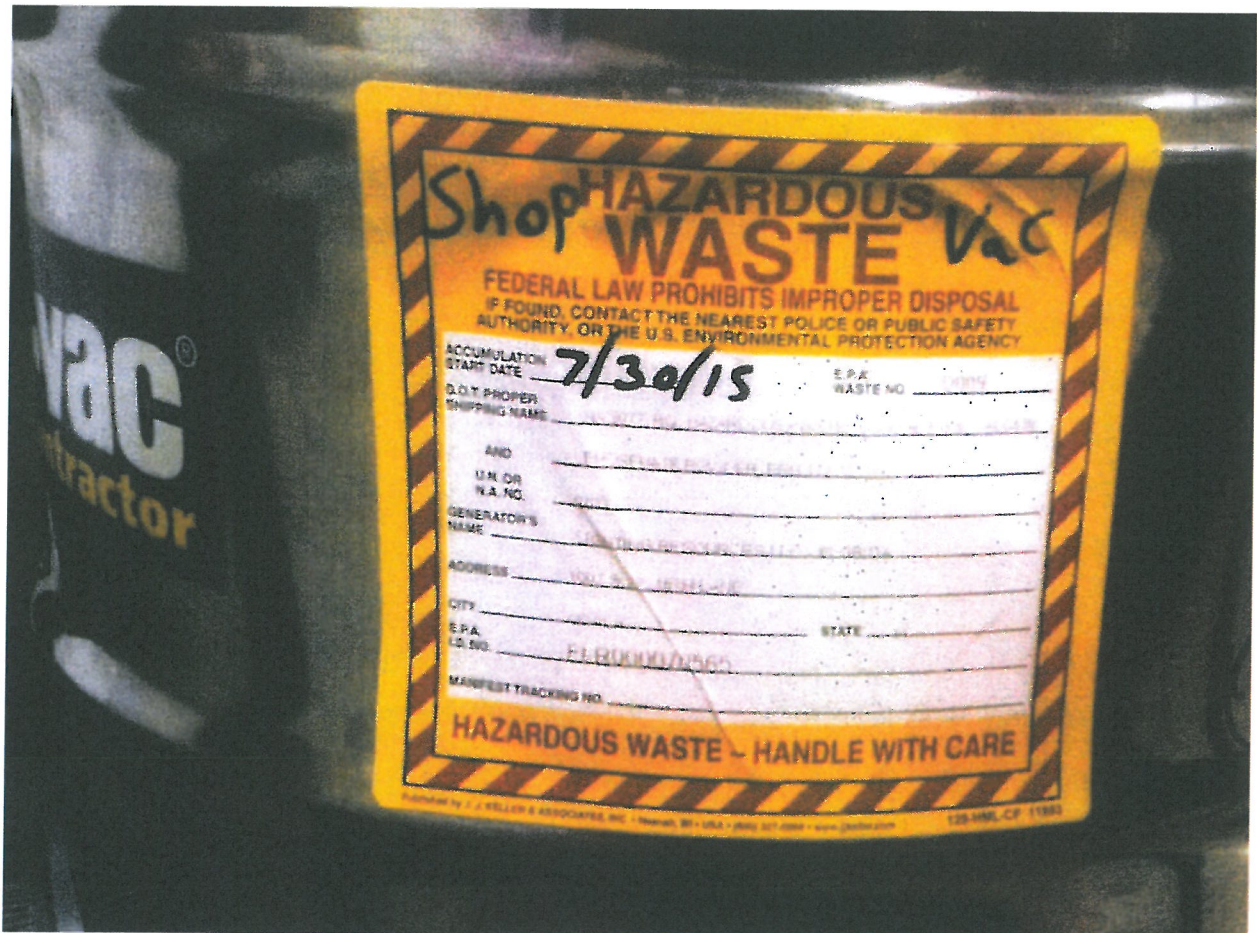




Photo 17 – Shop Vacuum with Airmasters



Photo 18 –Mercon Spill Kit





Photo 19 –Hazardous Waste Accumulation Drum in Warehouse C.



Exhibit 1 Jerome Meter Readings at Canopy

Jerome Meter Readings				Ocala, Florida			
Date		8:00 AM	10:00 AM	12:00 PM	2:00 PM	4:00 PM	
7/22/2015	AM14	0.013	0.009	0.013	0.008	0.013	DH
7/23/2015	AM14	0.012	0.012	0.010	0.012	0.013	DH
7/24/2015	AM14	0.000	0.005	0.007	0.005		RM
7/27/2015	AM14	0.010	0.013	0.010	0.010	0.014	DH
7/28/2015	AM14	0.015	0.010	0.010	0.010	0.045	DH
7/29/2015	AM14	0.008	0.007	0.008	0.012	0.010	RM
7/30/2015	AM14	0.010	0.010	0.010	0.011	0.011	RM
7/31/2015	AM14	0.012	0.009	0.005	0.008		RM
8/3/2015	AM14	0.008	0.005	0.004	0.004	0.010	DH



Exhibit 2 Test America Report – Drain Water  
Page 1 of 14



# TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

## ANALYTICAL REPORT

TestAmerica Laboratories, Inc.  
TestAmerica Tampa  
6712 Benjamin Road  
Suite 100  
Tampa, FL 33634  
Tel: (813)885-7427

TestAmerica Job ID: 660-72604-2

Client Project/Site: Processed Glass/Metals - Hg

For:  
Lighting Resources LLC  
1007 SW 16th Lane  
Ocala, Florida 34471

Attn: Jason Muhlenkamp

*Cathy Gartner*

Authorized for release by:  
3/16/2016 8:56:18 AM

Cathy Gartner, Project Manager I  
(615)301-5041  
[cathy.gartner@testamericainc.com](mailto:cathy.gartner@testamericainc.com)

### LINKS

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*The test results in this report meet all 2003 NELAP and 2002 TNI requirements for accredited parameters, exceptions are noted in this report. This report may not be reproduced except in full, and with written approval from the laboratory. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.*

*This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.*

*Results relate only to the items tested and the sample(s) as received by the laboratory.*

1

Exhibit 3 Test America Report – Drain Water  
Page 7 of 14 (Complete Report Available Upon Request.)

### Client Sample Results

Client: Lighting Resources LLC  
Project/Site: Processed Glass/Metals - Hg

TestAmerica Job ID: 660-72604-2

Client Sample ID: Drain Water

Lab Sample ID: 660-72604-5

Date Collected: 03/11/16 15:40

Matrix: Water

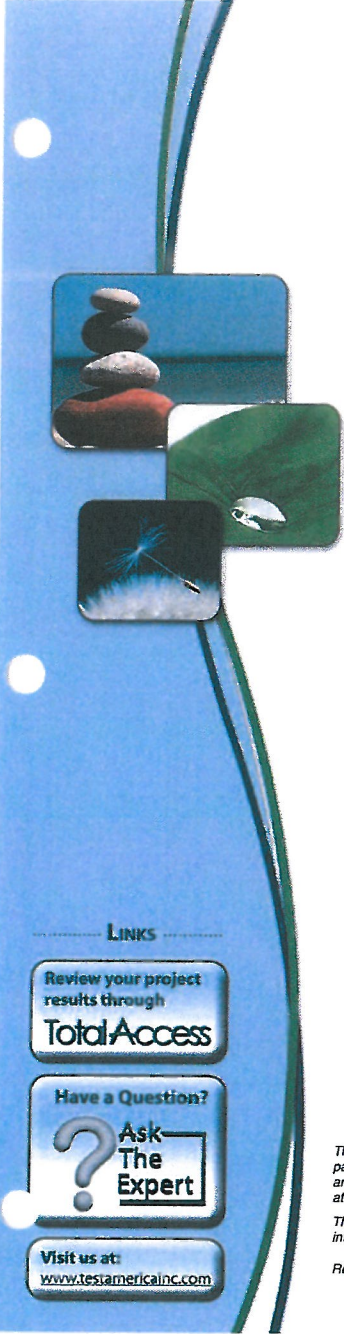


Date Received: 03/14/16 09:00

Method: 245.1 - Mercury (CVAA)									
Analyte	Result	Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	0.056	I	0.20	0.076	ug/L	-	03/15/16 12:00	03/15/16 16:31	1

TestAmerica Tampa



Exhibit 4 Test America Report – Shattershield Plastic  
Page 1 of 14

	<h1>TestAmerica</h1>	1
	THE LEADER IN ENVIRONMENTAL TESTING	2
	<h2>ANALYTICAL REPORT</h2>	3
	TestAmerica Laboratories, Inc. TestAmerica Tampa 6712 Benjamin Road Suite 100 Tampa, FL 33634 Tel: (813)885-7427	4
	TestAmerica Job ID: 660-72604-1 Client Project/Site: Processed Glass/Metals - Hg	5
	For: Lighting Resources LLC 1007 SW 16th Lane Ocala, Florida 34471	6
	Attn: Jason Muhlenkamp	7
		8
	Authorized for release by: 3/14/2016 9:29:14 PM	9
	Cathy Gartner, Project Manager I (615)301-5041 cathy.gartner@testamericainc.com	10
	<b>LINKS</b>	11
	Review your project results through <b>TotalAccess</b>	12
	Have a Question?  <b>Ask The Expert</b>	13
	Visit us at: <a href="http://www.testamericainc.com">www.testamericainc.com</a>	14

The test results in this report meet all 2003 NELAC and 2009 TNI requirements for accredited parameters, exceptions are noted in this report. This report may not be reproduced except in full, and with written approval from the laboratory. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.

Exhibit 5 Test America Report – Shattershield Plastic  
 Page 7 of 14 (Complete report available upon request)

Client Sample Results

Client: Lighting Resources LLC  
 Project/Site: Processed Glass/Metals - Hg

TestAmerica Job ID: 660-72604-1

Client Sample ID: Shattershield Plastic

Lab Sample ID: 660-72604-1

Date Collected: 03/11/16 15:00

Matrix: Solid

Date Received: 03/14/16 09:00

Method: 7471A - Mercury (CVAA)

Analyte	Result	Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	0.24		0.030	0.012	mg/Kg		03/14/16 15:02	03/14/16 16:49	1

Client Sample ID: Multipurpose Week 29 C1/C2

Lab Sample ID: 660-72604-2

Date Collected: 03/11/16 15:10

Matrix: Solid

Date Received: 03/14/16 09:00

Method: 7471A - Mercury (CVAA)

Analyte	Result	Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	0.35		0.029	0.012	mg/Kg		03/14/16 15:02	03/14/16 16:51	1

Client Sample ID: Processed Metal Week 29 C1/C2

Lab Sample ID: 660-72604-3

Date Collected: 03/11/16 15:20

Matrix: Solid

Date Received: 03/14/16 09:00

Method: 7471A - Mercury (CVAA)

Analyte	Result	Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	0.014	I	0.028	0.011	mg/Kg		03/14/16 15:02	03/14/16 16:52	1

Client Sample ID: Processed Glass Week 29 C1/C2

Lab Sample ID: 660-72604-4

Date Collected: 03/11/16 15:30

Matrix: Solid

Date Received: 03/14/16 09:00

Method: 7471A - Mercury (CVAA)

Analyte	Result	Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	2.1		0.058	0.023	mg/Kg		03/14/16 15:02	03/14/16 17:01	2

TestAmerica Tampa



Exhibit 6 Non-PCB Ballast Container –  
 Faded Label.

1. NON-HAZARDOUS WASTE MANIFEST		2. Generator ID Number: <u>DOT Shipping</u>		3. Page 1 of 2		4. Emergency Response Phone: <u>800-726-2444</u>		5. Waste Tracking Number: <u>DOT 8007</u>																					
6. Generator's Name and Mailing Address LLC Tech 2701 Hwy 77 Panama City, FL 32401 USA Generator's Phone: <u>904-882-2444</u> Generator's Site Address (if different from mailing address):																													
7. Transporter 1 Company Name: <u>Lighting Resources, LLC</u>								U.S. EPA ID Number: <u>FLR000070895</u>																					
7. Transporter 2 Company Name:								U.S. EPA ID Number:																					
8. Designated Facility Name and Site Address: <u>Lighting Resources, LLC (Do not)</u> 1007 SW 18th Lane Ocala, FL 34471 USA Facility's Phone: <u>352-809-3001</u>								U.S. EPA ID Number: <u>FLR000070895</u>																					
9. Waste Shipping Name and Description																													
<table border="1"> <thead> <tr> <th rowspan="2">10. Containers</th> <th rowspan="2">11. Total Quantity</th> <th rowspan="2">12. Unit Ref./Vol.</th> </tr> <tr> <th>No.</th> <th>Type</th> </tr> </thead> <tbody> <tr> <td>1. Discarded Mercury Containing Lamp for recycling - DOT Non-Regulated Shipped Various Sizes</td> <td>15</td> <td>DF</td> <td>300</td> <td>P</td> </tr> <tr> <td>2. Discarded Mercury Containing Lamp for recycling - DOT Non-Regulated Filter Various Sizes</td> <td>10</td> <td>DF</td> <td>500</td> <td>P</td> </tr> <tr> <td>3. Discarded Lamp for Recycling Non-Hazardous <u>NON PCB</u></td> <td>1</td> <td>DF</td> <td>300</td> <td>P</td> </tr> </tbody> </table>										10. Containers	11. Total Quantity	12. Unit Ref./Vol.	No.	Type	1. Discarded Mercury Containing Lamp for recycling - DOT Non-Regulated Shipped Various Sizes	15	DF	300	P	2. Discarded Mercury Containing Lamp for recycling - DOT Non-Regulated Filter Various Sizes	10	DF	500	P	3. Discarded Lamp for Recycling Non-Hazardous <u>NON PCB</u>	1	DF	300	P
10. Containers	11. Total Quantity	12. Unit Ref./Vol.																											
			No.	Type																									
1. Discarded Mercury Containing Lamp for recycling - DOT Non-Regulated Shipped Various Sizes	15	DF	300	P																									
2. Discarded Mercury Containing Lamp for recycling - DOT Non-Regulated Filter Various Sizes	10	DF	500	P																									
3. Discarded Lamp for Recycling Non-Hazardous <u>NON PCB</u>	1	DF	300	P																									
13. Special Handling Instructions and Additional Information: <u>All Materials Received are Subject to Cant &amp; Weight</u>																													
14. GENERATOR/SOFTWARE CERTIFICATION: I hereby declare that the contents of this manifest 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/Owner's Printed/Typed Name: <u>Kevin Nonas</u> Signature: <u>[Signature]</u> Month: <u>12</u> Day: <u>28</u> Year: <u>15</u> <input checked="" type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry: <u>[Signature]</u> Date leaving U.S.: <u>[Signature]</u>																													
15. TRANSPORTER ACKNOWLEDGMENT OF RECEIPT OF MATERIALS																													
Transporter 1 Printed/Typed Name: <u>Luis Navarro</u> Signature: <u>[Signature]</u> Month: <u>7</u> Day: <u>24</u> Year: <u>15</u> Transporter 2 Printed/Typed Name: Signature: Month: Day: Year:																													
17. Discrepancy																													
17a. Discrepancy Indication: <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 17b: Printed/Typed Name: <u>Jacques McHenry</u> Signature: <u>[Signature]</u> Month: <u>7</u> Day: <u>20</u> Year: <u>15</u>																													

Exhibit 7 Non-PCB Ballast Container – Faded Label.  
Consolidated outgoing shipping document 8-7-2015.

NONHAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of 1	3. Emergency Response Phone	4. Waste Tracking Number	
5. Generator's Name and Mailing Address Generator's Site Address (if different than mailing address)						
Generator's Phone:						
6. Transporter 1 Company Name				U.S. EPA ID Number		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address				U.S. EPA ID Number		
Facility's Phone:						
GENERATOR	9. Waste Shipping Name and Description		10. Containers		11. Total Quantity	12. Unit Wt/Vol
			No.	Type		
	1.					
	2.					
	3.					
4.						
13. Special handling instructions and Additional information						
14. GENERATOR/SUPPLIER'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/Supplier's Printed/Typed Name		Signature		Month Day Year		
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		Signature		Month Day Year		
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"/> Package <input type="checkbox"/> Partial Projection <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)		Signature		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		

169-BLC-O 6 10496 (Rev. 9/09)

51 D

COPY



97# KA10217 1a

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

\_\_\_\_\_  
 Printed Name of Clerk

\_\_\_\_\_  
 Signature

\_\_\_\_\_  
 Date

Transporter Acknowledgment of Receipt Materials

Facility Owner or Operator:	Certification of receipt of materials covered by this bill of lading.
-----------------------------	---

Jason Mullenkamp

James Mullins 7/21/15

LIGHTING RESOURCES LLC  
SOUTHEASTERN BRANCH

INTERNAL REQUEST FORM

16

7



Exhibit 10 New Reject Label

**REJECTED**

**RETURN TO SUPPLIER**

**DATE RECEIVED:** \_\_\_\_\_ **DATE RETURNED:** \_\_\_\_\_

**GENERATOR:** \_\_\_\_\_

**ADDRESS:** \_\_\_\_\_

**CITY:** \_\_\_\_\_ **STATE:** \_\_\_\_\_ **ZIP CODE:** \_\_\_\_\_

**REJECTED CONTENTS:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

2

Exhibit 11 Safety Meeting re: Audit, page 1

# Safety & Training Meeting Record Form

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

## Safety Topic Presentation

Topic Addressed	Program Leader	Length of Presentation	Discussion Comments
<i>July 31st Audit</i>	<i>Susan Richards</i>	<i>1 Hour</i>	<i>Labels, boxes, compliance, etc.</i>

## 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>



Exhibit 12 Safety Meeting re: Audit, page 2

1b

LUIS S. RODRIQUEZ	MERCURY RECOVERY PROCESS OPERATOR	
JUSTIN JAVIER	MERCURY RECOVERY PROCESS OPERATOR	<i>Justin Javier</i>
BRANDIN ZELLARS	MERCURY RECOVERY PROCESS OPERATOR	<i>Brandin Zellars</i>
KENNETH RIBBLE	MERCURY RECOVERY PROCESS OPERATOR	<i>Kenneth Ribble</i>
BRICE HALL	MERCURY RECOVERY PROCESS OPERATOR	<i>Brice Hall</i>

Employees not present for meeting:

*Richard Oruce*  
*Luis S. Rodriquez*

Exhibit 13 Rejected Material Log to 3/21/2016

LIGHTING RESOURCES, LLC Ocala, Florida REJECTED MATERIAL LOG			
DATE RECEIVED	FACILITY STAFF NAME	DESCRIPTION OF INCIDENT AND RESPONSE TAKEN	DATE RETURNED
7/21/2015	Buff Fritz	UNIDENTIFIED LIQUID	8/7/2015
7/21/2015	Buff Fritz	UNIDENTIFIED LIQUID	8/7/2015
9/21/2015	Buff Fritz	UNIDENTIFIED LIQUID	9/25/2015
9/28/2015	Buff Fritz	OIL SOAKED RAGS	10/9/2015
10/6/2015	Buff Fritz	WINE, RAT POISON, INSECTICIDE, & OIL SOAKED VERMICULITE	10/12/2015
10/20/2015	Buff Fritz	UNIDENTIFIED LIQUID	10/21/2015
10/27/2015	Buff Fritz	MICROCHIPS	11/4/2015
10/23/2015	Buff Fritz	USED VERMICULITE	11/6/2015
10/23/2015	Buff Fritz	USED VERMICULITE	11/6/2015
11/9/2015	Buff Fritz	PAINT	11/25/2015
11/9/2015	Buff Fritz	USED OIL FILTERS	11/25/2015
11/25/2015	Buff Fritz	FLOOR SEALANT	12/29/2015
11/25/2015	Buff Fritz	BIOHAZARD MATERIAL	12/29/2015
12/10/2015	Buff Fritz	OIL CONTAMINATED DEBRIS	12/29/2015
1/11/2016	Buff Fritz	MEDICAL WASTE	1/25/2016
1/11/2016	Buff Fritz	VARIOUS PAINT, CHEMICALS, & CLEANERS	1/25/2016
1/11/2016	Buff Fritz	VARIOUS PAINT, CHEMICALS, & CLEANERS	1/25/2016
1/11/2016	Buff Fritz	VARIOUS PAINT, CHEMICALS, & CLEANERS	1/25/2016
1/11/2016	Buff Fritz	VARIOUS PAINT, CHEMICALS, & CLEANERS	1/25/2016
1/20/2015	Buff Fritz	COSMETICS	1/25/2016
1/25/2016	Buff Fritz	PAINT	2/1/2016
3/7/2016	Buff Fritz	LIQUID CONTAINING DEBRIS	3/21/2016
3/7/2016	Buff Fritz	OIL	3/21/2016
3/16/2016	Buff Fritz	WET CRUSHED	3/24/2016
3/16/2016	Buff Fritz	WET CRUSHED	3/24/2016
3/21/2016	Buff Fritz	PART CLEANER	
3/21/2016	Buff Fritz	BROKEN CONTAMINATED LABORATORY CONTAINERS	



Exhibit 14 Notification to DEP of change in  
Emergency Contact information, page 1



**LIGHTING RESOURCES, LLC**

1007 SW 18th Lane  
Ocala, FL 34471  
(352) 800-3001 • Fax (352) 800-3012  
(888) 800-3001



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

805 E. Francis Street  
Ocala, Florida 34471  
(352) 800-3001

1302 E. Victory Street, Suite #4  
Florida, Arizona 85140  
(602) 276-4228

498 Park Hill Drive  
Greenwood, Indiana 46145  
(317) 650-3809

191 E. Bank St.  
Fort Worth, TX 76110  
(817) 921-1440

25 8

Exhibit 15 Notification to DEP of change in  
Emergency Contact information, page 2

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**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 Mgmt</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

5/23/2015 8:17 AM

Lighting Resources, LLC - Mercury  
Recovery Facility  
FL-DEP Permit: Mod



Exhibit 16 Table 3-1 New Employee Training

24

<p>Table 3-1 Lighting Resources, LLC - Mercury Recovery Facility, Ocala, FL Initial New Employee Training</p>	
Position Title (#)	Required Training
<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> </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> </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> </ul>
MCL / Lamp Processing Operators (2)	<ul style="list-style-type: none"> <li>24-Hour HAZWOPER Training</li> </ul>
<p><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.</p>	

Lighting Resources LLC - Mercury Recovery Facility  
FL-DEP Permit Modification Application  
Engineering Report -December 2013

Exhibit 17 Table 3-2 Facility Staffing Summary

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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>Table 3-2</b> <b>Lighting Resources, LLC - Mercury Recovery Facility, Ocala, FL</b> <b>Facility Staffing Summary</b>			
<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 Beckman MP5000 equipment; performs maintenance on process equipment; unloads materials from trucks and containers as they arrive, sorts / stages materials according to category and size; and seals and replaces containers for transport.	Reports to Operations Manager / Shift Supervisor	Possesses manual dexterity, properly uses PPE, and ability to work with minimum supervision.

Lighting Resources LLC - Mercury Recovery Facility  
FL-DEP Permit Modification Application  
Engineering Report - December 2013



Exhibit 18 Current Facility Staffing to 3-22-2016

LIGHTING RESOURCES, LLC - MERCURY RECOVERY FACILITY, OCALA, FL

FACILITY STAFFING SUMMARY				
POSITION TITLE	JOB DESCRIPTION / RESPONSIBILITIES	SUPERVISOR	REQUIREMENTS	NAME OF EMPLOYEE(S)
FACILITY MANAGER	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
OPERATIONS MANAGER	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
PROCESSING SUPERVISOR	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
WAREHOUSE SUPERVISOR	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
LOGISTICS COORDINATOR	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
OFFICE ADMINISTRATOR	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
DRIVER - CDL CLASS "A"	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 JEFF WATSON
MERCURY RECOVERY PROCESS OPERATOR	PERFORMS PRODUCTION COMPONENT SEPARATION OF MCL'S USING 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 or SHIFT SUPERVISOR	POSSESSES MANUAL DEXTERITY, PROPERLY USES P.P.E., AND ABILITY TO WORK WITH MINIMUM SUPERVISION	ELVY McCRAHIE JUSTINO CALZADA AGAPITO GARCIA JAMES CARMONA CHRIS GEIGER JUSTIN JAVIER KENNETH HUBLE JOSH LEWIS JOE LEWIS LARRY DENYKE

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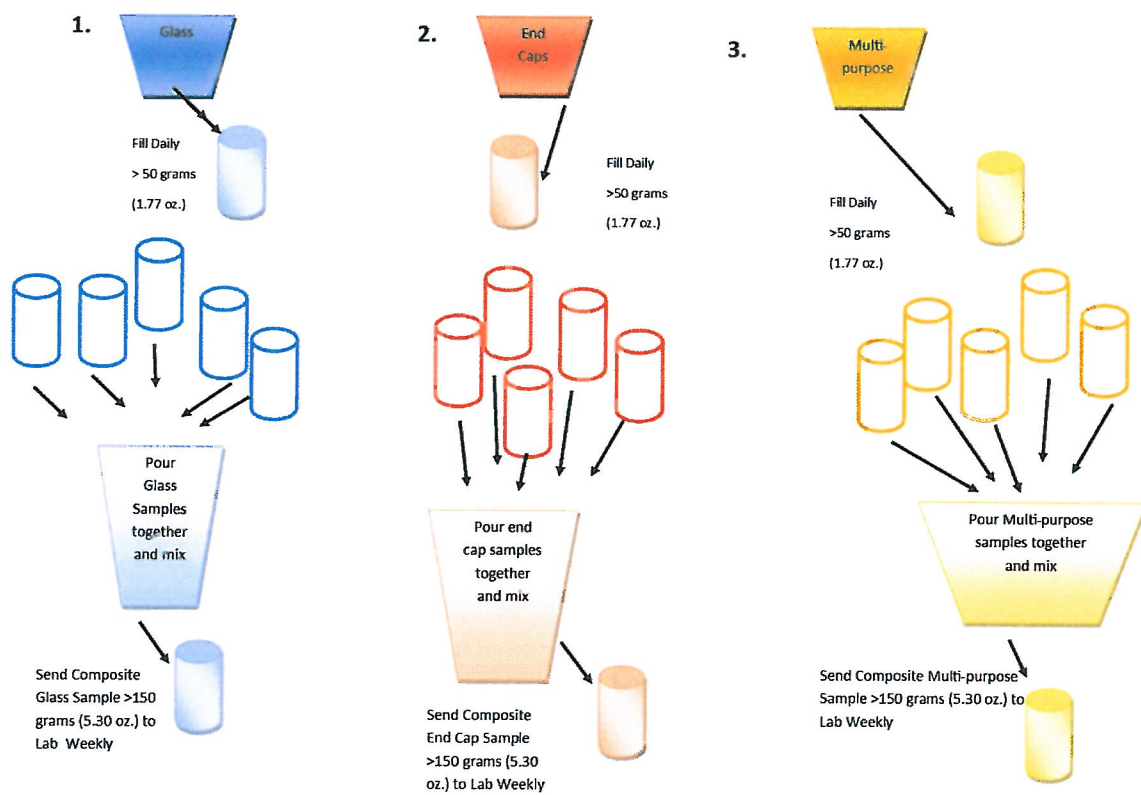
## Exhibit 19 Florida Daily and Weekly Sampling

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Exhibit 20 Florida Sampling Chart

### Daily and Weekly Sampling Procedures



## New Potential

### Violations and Areas of

#### Concern: Violations

Type: Violation

Rule: 262.11, 403.727(1)(a)

Explanation: A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste.

Specifically, Lighting Resources, LLC failed to conduct a proper waste determination on shields removed from lamps.

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

The Manager, Mr. Jason Muhlenkamp, transferred from another Lighting Resources location and had conducted a proper waste determination at that facility. Lighting Resources does now have a report on site for the Florida material.

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Type: Violation

Rule: 262.34(c)(1), 262.34(c)(1)(ii), 403.727(1)(a)

Explanation: 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 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.

It is well known in Florida that crushed lamps are NOT hazardous waste. However, in searching for that documentation, As such, Lighting Resources believed that any incidental breakage in the facility was generated crushed/broken lamps and therefore Universal Waste. However, crushed lamps are ONLY not hazardous for the generator per F.C.. We have changed the labelling in the facility as it relates to incidentally broken/crushed lamps and now use Hazardous Waste labels instead of Universal Waste.

---

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.

All these documents were available at the time of the audit. The Manager knew they were in the permit but missed finding them as he paged through the permit..

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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.

Lamp processors continuously work to minimize any incidental breakage. Buckled and crushed containers received in that condition are processed immediately or transferred to fiber drums. Drums are retired if they are compromised, leaking, rusted, bulging, or the seals are not effective. The items in the regular dumpster had been tested and were non-hazardous. The spent PPE and used rags were in an internal trash can and had not been disposed of in the dumpster. When the trash can was emptied, the processor would have disposed of it in the Hazardous Waste Accumulation drum.



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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.

This was overlooked at the time of Mr. Shorts departure. It was updated immediately upon LR recognizing the error.

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Type: Violation

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.

Lighting Resources has updated procedures to remove material from crushed or buckling boxes to fiber drums and move all labels accordingly. When drums have severe rusting, apparent structural defects or begin to leak or seals not effective the material is transferred to a container that is in good condition.

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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.

The vacuum itself was closed. It was stored in a room with negative air pressure that recycles the air in the room and removes mercury.

The 35 gallon poly drum should have been closed when no one was in attendance.

---

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.

The containers were labeled and moved to secondary containment. They were then sent out to be recycled. The procedure has been updated to send any used oil out to be recycled and not store any used oil.

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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;

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.

Specifically Lighting Resources corrected all issues either at the time of the audit or provided documentation of the correction in this response.



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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.

Per 261.171 states that a drum is not in good condition if it has severe rusting, apparent structural defects, begins to leak. The dented drums did cause structural defects.