

## Thursby, Kim

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**From:** Susan Richard <susan.richard@lightingresourcesinc.com>  
**Sent:** Monday, February 06, 2017 4:29 PM  
**To:** Epost HWRS (Shared Mailbox)  
**Cc:** Baker, Bryan; Walker, Kim (Waste); 'bastek.brian@epa.gov'; 'Merizalde.carlos@epa.gov'; McBride, Ashanti; Cinquino, Dawn; White, John; Eckoff, Michael; Jason Muhlenkamp; Kothur, Bheem  
**Subject:** RE: Lighting Resources, LLC;FLR 000 070 565;First Request for Additional Information (RAI)

DEP State of Florida

I acknowledge receipt of this document today February 6, 2017 on behalf of Lighting Resources, LLC Florida and Jason Muhlenkamp, Branch Manager.

Thank you.

*Susan Richard*, Chief Compliance Officer

**Lighting Resources, LLC**

805 East Francis St.  
Ontario, CA 91761  
909-923-3962  
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949-300-7559 cell  
[susan.richard@lightingresourcesinc.com](mailto:susan.richard@lightingresourcesinc.com)

**The will to win is nothing unless you have the will to prepare. USAF**

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**From:** Thursby, Kim [mailto:Kim.Thursby@dep.state.fl.us] **On Behalf Of** Epost HWRS (Shared Mailbox)  
**Sent:** Friday, February 3, 2017 10:53 AM  
**To:** Susan Richard  
**Cc:** Baker, Bryan; Walker, Kim (Waste); 'bastek.brian@epa.gov'; 'Merizalde.carlos@epa.gov'; McBride, Ashanti; Cinquino, Dawn; White, John; Eckoff, Michael; Jason Muhlenkamp; Kothur, Bheem  
**Subject:** Lighting Resources, LLC;FLR 000 070 565;First Request for Additional Information (RAI)

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us). (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in “pdf” format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at [www.adobe.com/products/acrobat/readstep2.html](http://www.adobe.com/products/acrobat/readstep2.html).

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Bryan Baker, P.G.  
Environmental Administrator  
Hazardous Waste Program & Permitting





# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Ryan E. Matthews  
Interim Secretary

## REQUEST FOR ADDITIONAL INFORMATION

February 3, 2017

Susan Richard, Chief Compliance Officer  
1007 SW 16<sup>th</sup> Lane  
Ocala, Florida 34471  
[Susan.richard@lightingresourcesinc.com](mailto:Susan.richard@lightingresourcesinc.com)

Re: First Request for Additional Information (RAI)  
Marion County – Hazardous Waste  
Facility Name: Lighting Resources, LLC  
Facility ID: FLR 000 070 565  
DEP Application No.: 0309339-HO-003

Dear Ms. Richard:

Thank you for your application for renewal permit for the above referenced Facility. The Department has assigned DEP Application No. 0309339-HO-003 to the application. A Department staff review of the application and supporting documentation submitted on January 12, 2017, indicates the application is incomplete. Pursuant to the provisions of Rule 62-730.220 F.A.C. Rule 62-730.220(6) and Rule 62-737.800 F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

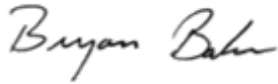
In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us) with a copy to [Bheem.kothur@dep.state.fl.us](mailto:Bheem.kothur@dep.state.fl.us). If the file is very large, you may post it to a folder on this office's ftp site at: <ftp://ftp.dep.state.fl.us/pub/incoming/DWM/>[name of folder]. After

posting the document, send an e-mail to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to [Bheem.kothur@dep.state.fl.us](mailto:Bheem.kothur@dep.state.fl.us), alerting us that it has been posted.

If you have any questions, please contact Bheem Kothur by telephone at 850-254-8781 or by e-mail at [Bheem.kothur@dep.state.fl.us](mailto:Bheem.kothur@dep.state.fl.us).

Sincerely,

A handwritten signature in cursive script that reads "Bryan Baker".

Bryan Baker, P.G.  
Environmental Administrator  
Florida Department of Environmental Protection

Cc (with Attachments):

Brian Bastek, EPA Region 4, [bastek.brian@epa.gov](mailto:bastek.brian@epa.gov)

Carlos Merizalde, EPA Region 4, [merizalde.carlos@epa.gov](mailto:merizalde.carlos@epa.gov)

Ashanti McBride, OGC Tallahassee, [ashanti.mcbride@dep.state.fl.us](mailto:ashanti.mcbride@dep.state.fl.us)

Dawn Cinquino, FDEP Tallahassee, [dawn.cinquino@dep.state.fl.us](mailto:dawn.cinquino@dep.state.fl.us)

John White, FDEP Central District, [john.white@dep.state.fl.us](mailto:john.white@dep.state.fl.us)

Michael Eckoff, FDEP Central District, [michael.eckoff@dep.state.fl.us](mailto:michael.eckoff@dep.state.fl.us)

Jason Muhlenkamp, Lighting Resources, [Jason.muhlenkamp@lightingresourcesinc.com](mailto:Jason.muhlenkamp@lightingresourcesinc.com)

## **ATTACHMENT A: List of Requested Information**

Facility Name: Lighting Resources, LLC  
Facility ID: FLR 000 070 565  
DEP Application No.: 0309339-HO-003

### **Specific Comments:**

1. Application for a Mercury-Containing Lamp or Device Mercury Recovery or Mercury Reclamation Facility Permit, Part I, A. General Information:
  - a. Page 11, Item 3, Revision Number: Please identify the revision number as “1”.
  - b. Page 14, Item 21, Existing or pending environmental permits: Please update the “Date Issued” and “Expiration Date” information for all permits listed.
2. Engineering Report Updated – 1/2017:
  - a. Page 2, Section 1.2, Facility Layout: The second to last paragraph states “The facility also accepts Non-RCRA materials defined as E-Waste for processing...” This statement is incorrect. If the e-waste exhibits a hazardous waste characteristic for toxicity (per 40 CF 261.24), the electronic waste may be regulated as hazardous waste. Please delete the word “Non-RCRA” in this paragraph.
  - b. Page 2, Section 1.4, Other Facility Permits: The General Air Permit Registration is listed as being received on November 10, 2021. Should this read “expires on”?
  - c. Page 16, Section 2.6, Area A, Lamp Storage: This section should be modified to reflect the storage of electronic waste pallets within available space in rows 1 through 10.
  - d. Page 19, Section 3.1, Overview of Facility Operations: Per comment 2a above, please delete the word “Non-RCRA” in this section.
  - e. Page 32, Section 3.12, Processing Throughput and Staging/Storage Volumes, Table 3-3: This table should be modified to reflect the storage of electronic waste pallets within available space in rows 1 through 10.
  - f. Page 67, Section 7.2 Maximum Material Inventory at Closure, Table 7.1: Please update this table to reflect storage of electronic waste. Please also remove the “1” before “Table 7.1” in the heading.
  - g. Page 70, Section 7.5, Closure Cost Estimate: Please provide the actual costs associated with disposal of electronic waste which can vary depending on the types(s) of electronic waste handled.

3. Solid Waste Management Units (SWMUs): The permit renewal application did not reference Solid Waste Management Units. During the Inspection on July 30, 2015, a potential SWMU was noted. The text from the Report is as below:

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.

A Solid Waste Management Unit (SWMU)/Area of Concern (AOC) Profile Sheet is attached for your information and use (Attachment B). Please complete the sheet as appropriate and submit for our review, along with the results of any sampling and analysis that has been performed to date at this potential SWMU location.

4. Operating Plan Checklists: Please review the checklists used at your facility and compare them with those included in the Operating Plan to ensure consistency.

**Attachment B: Solid Waste Management Unit (SWMU)/Area of Concern (AOC)  
Profile Sheet**

<b>ACTION</b>	<b>DESCRIPTION</b>
Number:	SWMU No. generally, continue existing numbering sequence.
Type of Unit	e.g., tank, container, vault, UIC well, surface impoundment, landfill, dumpster, aerosol can crusher, etc. In the event there is no constructed type of unit, it can be described (e.g., open burn and/or detonation area on the ground; pits, ditches, etc.)
Name:	Unique SWMU name (e.g., Used Oil Tank#1, Used Oil Filter Collection Area, Septic tank, Landfill #1, Satellite Accumulation Area, Stormwater Pond #1, etc.)
Unit Characteristics:	General description, including location map, dimensions, SWMU components, appurtenances, construction material, cover (roof?), inside/outside unit, secondary containment, secondary containment capacity, etc.
Operational History:	Dates of operations; dates unit was modified; changes to operational history, e.g., date SWMU ceased operation, changed functions or was physically removed.
Permits	Identify any permits (pending or issued), licenses or authorizations for a unit (e.g., an NPDES permit for a WWTU; an operating permit for an active landfill). Attach a copy of the permits, licenses or authorizations.
Current Status:	Active, inactive but physically existing with the intent of operating in the future, physically closed with no intent to use in the future, certified closed, no longer exists.
Waste Characteristics:	Description of types, volumes, and hazardous or nonhazardous characteristics of waste media managed in the unit. Include hazardous waste codes. Include non-hazardous components (e.g., sulfides, nitrates, pH, etc.).
Waste Management:	Description of handling, treatment, storage, and disposal practices, including names and addresses of treatment, storage or disposal facilities used. Include recycling facilities if materials are recycled. If a permitted unit, include permitted discharges and discharge limits and recent compliance reports;
Maintenance Procedures:	Description of maintenance and inspection procedures to assure unit integrity.
Release History:	Visual evidence or reports of hazardous or non-hazardous releases, including associated dates and any regulatory actions performed. Include any assessment data. If the SWMU is regulated under another program, provide the latest compliance data (e.g., if a WWTP has an NPDES permit, provide the latest discharge point sampling data. If a landfill, include a summary of the latest groundwater monitoring and leachate data).
Potential Pathways:	Air (L), soil (L), surface water (L), sediment (L), groundwater (L). Use L (low), M (medium) or H (high)

Exposure Potential:	Location and use of nearby water wells, surface water, and other potential human and environmental/ecological receptors.
Remedial Action:	Description of any interim measures and remedial action performed due to past releases, including dates and types of remediation performed and waste management.
Recommendation and reason for recommendation	No Further Action, Confirmation Sampling, RFI necessary, RAP necessary or continuation of any of these that are in progress.
References (if any)	Include title, date and author of any reports that support this table's information
Photographs	Include SWMU name, short description, orientation (e.g., facing south), date of photo and name of photographer. Point out any significant features.