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Cc: [Parvez A. Mallick \(mallick.parvez@epa.gov\)](mailto:Parvez.A.Mallick@epa.gov); ["Jason Muhlenkamp"](#); [Hall, Daniel K.](#)
Subject: Hazardous Waste Inspection
Date: Friday, March 24, 2017 9:36:00 AM

Mr. Fritz,

Thank you again for taking the time to meet with us and assist in the inspection of Lighting Resources Ocala facility. As discussed at the end of the meeting below is a list of information I need to complete the inspection and concerns noted.

1. An in-coming load from Heritage Crystal Clean was not loaded properly at the originating facility. When it arrived at Lighting Resources boxes of lamps were found to have been tossed around during transport with open lamp containers and broken lamps on the floor of the truck. This is not an issue for Lighting Resources other than it puts employees at potential risk of exposure when they open the truck and have to unload the materials. A copy of the shipping paper was provided and I will be following up with Heritage Crystal Clean to determine why the load was shipped in this manner.
2. Retail returns from PSC Allworth (Stericycle) contain materials that are not acceptable for Lighting Resources to accept. These materials are segregated by Lighting Resources and the rejected material are correctly returned to PSC Allworth. Please provide information for all rejected loads (shipping papers) returned in 2016 and 2017.
3. Invoices and shipping papers indicate Lighting Resources is receiving shipments of elemental mercury. The facility is not permitted to accept elemental mercury. Any shipments of this material should not remain on-site for greater than 24 hours. Please provide copies of shipping papers documenting receipt of elemental mercury (or liquid mercury) for 2016 and 2017. Also, please provide copies of shipping papers documenting when these materials were shipped from Lighting Resources Ocala to a destination facility.
4. Please provide copies of weekly container inspection logs for 2017.
5. Please provide copies of the sample logs (analysis results documenting mercury concentration) and the rolling 12-week average for 2016 and 2017.
6. Please provide dates for initial 40-hour or 24-hour OSHA certifications for current Lighting Resources Ocala personnel.
7. Please provide copies of hazardous waste manifests for 2016 and 2017 waste phosphorus powder shipments with the destination facility signature documenting the materials arrived at the TSD.
8. Please provide written notice that Raenell Norris and one additional back-up employee will attend DOT training as required for staff signing hazardous waste manifests.
9. Please provide written notice that the drum of hazardous waste debris in the processing area has been provided with an accumulation start date. One of the eight 55-gallon drums did not have a start date and one drum had a date that had been damaged during movement of the container.

Thank you,

John White
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