

From: Mark Larsen
To: [White, John](#); [Bryan Jones](#); [Stephen Lefon](#)
Cc: [Parvez A. Mallick \(mallick.parvez@epa.gov\)](#); [Daniel, Christine](#)
Subject: RE: Hazardous Waste Inspection
Date: Monday, March 27, 2017 11:39:29 AM

To clarify my statement, the LSS1 systems can be run independently from each other, we can run just the chain, or the trammel number 1 if needed. We had a few shatter shields inadvertently fed into the LSS1, they caused an obstruction at the top of the elevator shaft that had to be removed through an access panel where the chain dumps into Trommel number 1. My employees removed the obstruction and then ran the elevator chain. This function of the machine can operate independently from the rest of the machine. It was operated so that the obstructions would run to the top and be removed. The glass powder that was observed was generated from the clean glass that exits the LSS1 and falls into the hoppers we use to dump the glass into the roll off. The glass in the roll offs are routinely sampled on a daily basis and tested for excessive Mercury. Additionally, the vacuum fan on the LSS1 runs constantly, we keep it running even when the machine isn't being used.

Mark Larsen

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From: White, John [mailto:John.White@dep.state.fl.us]
Sent: Monday, March 27, 2017 10:30 AM
To: Mark Larsen <mlarsen@aerc.com>; Bryan Jones <bjones@cleanearthinc.com>; Stephen Lefon <slefon@aerc.com>
Cc: Parvez A. Mallick (mallick.parvez@epa.gov) <mallick.parvez@epa.gov>; Daniel, Christine <Christine.Daniel@dep.state.fl.us>
Subject: RE: Hazardous Waste Inspection

Mark,

The issue noted during the inspection was the visible material in the air in the processing room. It was my understanding the machine had been operated with a panel open following removal of a shatter shield. That would be a processing activity that could be rectified by ensuring all panels are closed prior to beginning operation. The second possible source was the use of glass hoppers without a cover, allowing phosphor powder to billow up around the equipment.

I understand your position that the machine had to be operated in order to remove the materials causing blockage. I am just trying to understand if there is a separate issue that may have caused the visible release. In this case, if it was just the panel being inadvertently left open following removal of the shatter shield that caused the problem then that is something that can easily be prevented in

the future. Please let me know if this is the correct understanding.

Thanks

John

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From: Mark Larsen [<mailto:mlarsen@aerc.com>]
Sent: Monday, March 27, 2017 8:57 AM
To: White, John <John.White@dep.state.fl.us>; Bryan Jones <bjones@cleanearthinc.com>; Stephen Lefon <slefon@aerc.com>
Cc: Parvez A. Mallick (mallick.parvez@epa.gov) <mallick.parvez@epa.gov>; Daniel, Christine <Christine.Daniel@dep.state.fl.us>
Subject: RE: Hazardous Waste Inspection

I'm not sure what we could have done differently in this case, the shatter shields had to come out to prevent damage to the machine and keep it working properly, there are times the machine has to be run with panels open and this is one of them, no lamps were being processed so there shouldn't have been a release.

I spoke with the representatives of the new company took over AERC and they think they have covered rollofs they can send to us, I'll know if that's true today.

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From: White, John [<mailto:John.White@dep.state.fl.us>]
Sent: Monday, March 27, 2017 8:46 AM
To: Mark Larsen <mlarsen@aerc.com>; Bryan Jones <bjones@cleanearthinc.com>; Stephen Lefon <slefon@aerc.com>
Cc: Parvez A. Mallick (mallick.parvez@epa.gov) <mallick.parvez@epa.gov>; Daniel, Christine <Christine.Daniel@dep.state.fl.us>
Subject: RE: Hazardous Waste Inspection

Mark,

Thank you for the update. I understand the reasoning behind the increase in production and the issue with the shatter shields. It is still a concern anytime the machine is operated in a manner that could cause phosphor powder to vent to the production area. Regarding the glass roll-off, please provide a schedule for when the new frame will be installed. In the meantime, the container should be covered with the tarp to prevent wind dispersal and rainwater from affecting the material.

Thank you,

John

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From: Mark Larsen [<mailto:mlarsen@aerc.com>]
Sent: Monday, March 27, 2017 8:39 AM
To: White, John <John.White@dep.state.fl.us>; Bryan Jones <bjones@cleanearthinc.com>; Stephen Lefon <slefon@aerc.com>
Cc: Parvez A. Mallick (mallick.parvez@epa.gov) <mallick.parvez@epa.gov>; Daniel, Christine <Christine.Daniel@dep.state.fl.us>
Subject: RE: Hazardous Waste Inspection

Good Morning John,

I'm not sure how much it will matter but I wanted to clarify what happened with the LSS1 the day before you arrived, I had a meeting with my guys to discuss the concerns you raised in your inspection, I explained to them why they cannot process lamps with any access panels removed, the two employee's that were involved in the incident in question stopped me and explained that they had to run the machine with the access panel off in order to get the rest of the shatter shields out of the machine but that they never ran any lamps into the machine while the access panel was removed, the excess powder in the room was due to them using the open top hoppers without a lid that the clean glass pours into, we split shifts to doubled production and the two hoppers that have covers were full because Waste Management hadn't emptied the outside roll off yet, it was full and we had nowhere to dump the glass.

Let me know if you have any questions

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From: White, John [<mailto:John.White@dep.state.fl.us>]

Sent: Wednesday, March 22, 2017 1:34 PM

To: Mark Larsen <mlarsen@aerc.com>

Cc: Parvez A. Mallick (mallick.parvez@epa.gov) <mallick.parvez@epa.gov>; Daniel, Christine <Christine.Daniel@dep.state.fl.us>

Subject: Hazardous Waste Inspection

Mr. Larsen,

Thank you for taking the time to meet with Parvez Mallick, U.S. EPA Region 4, and myself yesterday. Your time and knowledge was appreciated. In order to complete the inspection we still require the names and training records for temporary employees working in the warehouse and processing area.

The only issue of concern noted was the visible dust in the processing area. Based on information provided, the dust was due to a malfunction on 3/20/2017, the day prior to the inspection. A shatter shield blocked a vent panel and, upon removal, the panel was not closed resulting in a release of phosphor powder to the air within the processing room. This may be a potential violation of Permit Condition Part II, Subpart A – General Operating Conditions, Item 10 and 40 CFR 264.31. The facility had corrected the malfunction and started the response to the release at the time of the inspection. Please continue with the cleanup of the room and provide notice upon completion of the task.

Reports will be provided by both myself and Mr. Mallick upon completion.

Thank You,

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