

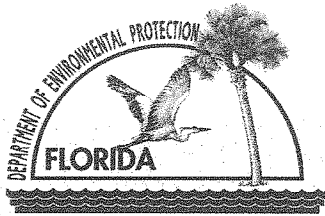


**1007 SW 16TH LANE
OCALA, FLORIDA**

**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
MERCURY RECOVERY FACILITY
RENEWAL APPLICATION
FLR000070565**

January 2017

**Application for Renewal
1/2017**



DEP Form #	62-737.900(2)
Form Title	Mercury Recovery and Mercury Reclamation Facility Permit Application Form
Effective Date	May 20, 1998

Department of Environmental Protection

Mercury-Containing Lamp and Device Mercury Recovery and Mercury Reclamation Facility Permit Application Form and Instructions

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**GENERAL INSTRUCTIONS TO APPLY FOR A MERCURY-CONTAINING
LAMP OR DEVICE MERCURY RECOVERY
OR MERCURY RECLAMATION FACILITY PERMIT**

WHO MUST FILE

All persons who own or operate or who intend to construct a spent mercury-containing lamp (MCL) or mercury-containing device (MCD) mercury recovery or mercury reclamation facility (also referred to herein as "recycling facility") as defined in Chapter 62-737, Florida Administrative Code (F.A.C.), must apply for a facility permit, unless exempted in accordance with Rule 62-737.700, F.A.C. The format discussed herein and referenced in Rule 62-737.800, F.A.C., "Permit Application Requirements and General Permitting Standards for Mercury Recovery and Mercury Reclamation Facilities", must be used when filing for any type of MCL or MCD recycling facility permit. All applicants are encouraged to arrange for a pre-application conference with the Department before completing their permit application.

Any owner or operator who intends to renew or transfer an existing recycling facility permit must submit a completed application and other associated information. Some modifications of an existing recycling permit may require the submittal of a completed application and other associated information. Applicants are encouraged to arrange for a pre-application conference to discuss the modification, renewal or transfer application. See the MODIFICATION, RENEWAL AND TRANSFER OF PERMITS section of these instructions for detailed instructions.

HOW TO FILE

Send the completed permit application package with all attachments to the Department (DEP) District Office that serves the area where the storage or recycling facility is located. Provide a header with revision number, page number and date on each page of the application. DEP offices are located in Pensacola, Jacksonville, Orlando, Tampa, West Palm Beach, and Ft. Myers. A minimum of 4 copies are required. Include a Certification [DEP Form 62-737.900(2), Part II, F.A.C.] with original signatures with each copy of the application.

The Department will review and comment on the completeness of the application within 60 days of receipt of the application. If it is not complete, the Department will send the applicant a Notice of Deficiency (NOD) within the prescribed time and will ask the applicant to send additional information or correct apparent errors or omissions. The applicant must send four (4) certified copies with the additional information within the time specified in the NOD. Again, include a Certification [DEP Form 62-737.900(2), Part II] with each copy. Provide a header with the revision number, page number and date on each page of the additional information so that it can be put into the application in the proper place.

TYPES OF PERMITS

Mercury Recovery Facility Permit

Rules 62-737.800 and 62-737.840, F.A.C., describe the permitting requirements for this type of facility. The application fee for an operation permit is \$2,000.00. **Send the application fee with the completed permit application** to construct and operate a new mercury recovery facility or to modify an existing facility.

Complete the following to apply for a facility operation permit:

- | | |
|---------------------------------|---|
| A) General Facility Information | D) Operating Information |
| B) Site Information | E) Owner and Operator certification forms |
| C) Land Use Information | F) Land Owner and P.E. forms |

Mercury Reclamation Facility Permit

Rules 62-737.800 and 62-737.860, F.A.C., describe the permitting requirements for this type of facility. The application fee for an operation permit is \$2,000.00. **Send the application fee with the completed permit application** to construct and operate a new mercury reclamation facility or to modify an existing facility.

Complete the following to apply for a facility operation permit:

- | | |
|---------------------------------|---|
| A) General Facility Information | D) Operating Information 1 through 12 |
| B) Site Information | E) Owner and Operator certification forms |
| C) Land Use Information | F) Land Owner and P.E. forms |

MODIFICATION, RENEWAL AND TRANSFER OF PERMITS

Facility operators are advised to contact the appropriate District Office prior to modification, renewal or transfer of permits to discuss the modification, renewal or transfer application and procedures. Information contained in documents previously submitted to the Department in support of a permit which is still valid and which information is not to be modified need not be resubmitted when completing the application for a modification, renewal or transfer. However, such information must be accurately referenced to the effective dates of the existing document(s) or parts of the existing document(s), e.g., closure plan submitted in support of an existing permit.

MODIFICATION OF PERMIT

Before making any modification to a mercury recovery or a mercury reclamation facility, the owner or operator shall submit to the Department a completed Permit Application Form and Instructions, DEP Form 62-737.900(2). Facility owners and operators are advised to contact the appropriate District Office for guidance as to whether a change would be considered a modification or simply routine maintenance which does not require submittals or fees (see "Types of Modifications and Fees" below). The engineering aspects of the application must be certified by a Professional Engineer.

After notice, and administrative hearing if requested by the permittee or a substantially affected party, the Department may require the permittee to conform to new or additional conditions upon a showing of good cause. Per F.A.C. Rule 62-739.290, good cause shall include, but not be limited to, the following:

1. The standards or rules on which the permit was based have been changed by amendment or judicial decision after the permit was issued;
2. The Department has received information which was not available at the time of permit issuance and would have justified different permit conditions;
3. There are alterations in the facility after permit issuance which justify different permit conditions but do not require a construction permit; or
4. The causes set forth in 40 CFR Sections 270.41 and 270.42.

When a permit is to be modified only the conditions subject to modification are opened. All other aspects of the permit shall remain in effect. Upon a written request by the permittee submitted on a completed Permit Application Form and Instructions, DEP Form 62-737.900(2), and submittal of the appropriate permit modification fee, the Department shall grant or deny modifications to the permit.

Types of Modifications and Fees. Facility operators are advised to contact the appropriate District Office for guidance on how to determine which type of modification and fee, if any, applies before submitting the required application and information. Modifications may be substantial modifications or minor modifications. Routine maintenance is not considered to be a modification.

1. Substantial Modifications. Pursuant to paragraphs 62-4.050(6) and (7), F.A.C., a substantial modification means a modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review. For the purposes of establishing fees for modifications, substantial modifications are further delineated in 62-4.050(k)17.a.-c., F.A.C. These modifications shall be accompanied by public notice as required in section 62-730.220(9)(c) and (d) and are subject to the following fee schedule:

a. Substantial modifications requiring extensive technical evaluation by the Department (62-4.050(k)17.a., F.A.C.) Same Fee as New Application

b. Substantial modifications requiring moderate technical evaluation by the Department (62-4.050(k)17.b., F.A.C.) \$1,000

c. Moderate modifications requiring moderate technical evaluation by the Department (62-4.050(k)17.c., F.A.C.) \$500

2. Minor Modifications. Pursuant to Rule 62-4.050(4)(r), F.A.C., a minor modification means a modification that does not require substantial technical evaluation by the Department, does not require a new site inspection by the Department, and will not lead to substantially different environmental impacts or will lessen the impacts of the original permit. Minor modifications do not require public notice.

\$100

3. Routine Maintenance. Changes at a facility which involve routine maintenance, such as repair of equipment, replacement of equipment with similar equipment, aesthetic changes, or minor operational changes are not considered modifications, do not have to be reported to the Department, and require no fee. Facility operators are advised to contact the appropriate District Office for guidance as to whether a change would be considered routine maintenance.

RENEWAL OF PERMIT

The owner or operator must apply for a renewal of the permit at least 180 days before the expiration of a facility operating permit. If there are no changes to the facility plan, its operation, or regulatory changes that affect its operation, then the owner or operator must submit:

1. A letter stating that no changes are to be made which would require modification of the permit or a proposal for modification;

2. A completed Permit Application Form and Instructions, DEP Form 62-737.900(2); and

3. The permit application fee. If there are any changes to the facility plan, its operation, or regulatory changes that affect its operation, then the owner or operator must submit a completed Permit Application Form and Instructions, DEP Form 62-737.900(2) and the permit application fee.

TRANSFER OF PERMIT

Permits may be transferred by the current owner or operator (transferring permittee) to a new owner or operator (proposed permittee) only upon Department approval. Application for transfer shall be made by the transferring permittee at least 90 days before the effective date of the transfer. If there are no changes to the facility plan, its operation, or regulatory changes that affect its operation, then the transferring permittee must submit:

1. A demonstration that the proposed permittee meets the financial responsibility requirements adopted in Section 62-737.800(4)(g) and 62-737.800(14), F.A.C.;
2. A letter stating that no changes are to be made which would require modification of the permit or a proposal for modification;
3. A completed Permit Application Form and Instructions, DEP Form 62-737.900(2).; and
4. A \$50 permit transfer fee.

If there are any changes to the facility plan, its operation, or regulatory changes that affect its operation, then the transferring permittee must submit a completed Permit Application Form and Instructions, DEP Form 62-737.900(2), and the permit application fee in instead of the letter, application and permit transfer fee required above when there are no changes.

The transferring permittee shall comply with the requirements of Section 62 737.800(g), F.A.C. until the proposed permittee has demonstrated compliance with that section. The transferring permittee shall also comply with subsection 403.722(13), Florida Statutes, which specifies certain other requirements.

COMPLETION OF THE APPLICATION

Type or print the application. Answer all questions in the applicable parts. Provide a header with revision number, date, and page number on each page of the application. Mark any questions that are not applicable "N/A." Type, print or sketch all necessary attachments on 8 1/2" x 11" paper (except for any required maps or scale drawings). Clearly present the attachments with the appropriate part of the application in a standard 3-ring or D-ring binder. Use the **exact format** as presented in these Permit Application Instructions which is required in Chapter 62-737 F.A.C. Incomplete applications will delay the permit process and could affect the continued operation of existing facilities.

SPECIFIC INSTRUCTIONS TO APPLY FOR A RECYCLING FACILITY PERMIT

A MCL or MCD Mercury Recovery or Mercury Reclamation (recycling) facility permit application consists of two parts:

PART I - Application and General Permitting Requirements

These requirements are found in Rules 62-737.800 through 62-737.860, F.A.C., and contain general information on the facility, use, operation, emergency response, quality control and closure requirements. The information requested in this part is applicable to all types of MCL or MCD recycling facilities. Submit this part at the earlier of: (1) sixty days after the date Chapter 62-737,

F.A.C., is effective or (2) prior to operation for new facilities constructed after Chapter 62-737, F.A.C., is effective.

PART II - Certification

This part contains the facility operator's, facility owner's, land owner's, and professional engineer's certification of the application and all attachments as required in Rule 62.737.800, F.A.C. Include a new certification with **original signatures** with each copy of each new submittal.

Confidential Information

Information submitted to the Department relating to secret processes, methods of manufacture or production, or confidential records may be claimed by the applicant to be of a confidential nature. Claims of confidentiality must be submitted as described in 403.73 and 403.11, Florida Statutes.

LINE-BY-LINE INSTRUCTIONS FOR COMPLETING PART I OF THE APPLICATION FOR A MCL OR MCD MERCURY RECOVERY OR MERCURY RECLAMATION FACILITY PERMIT

A. General Information

1. Enter an "X" in the appropriate blocks for each type of facility and operational unit for which the applicant is filing a permit application.
2. Enter an "X" in the appropriate block for the type of permit application.
3. Enter the revision number. (The initial application revision number is 0.)
4. Enter the date operation began or the proposed date of the start of operation.
5. Enter the full legal name of the facility.
6. Enter the facility's EPA identification number. If you do not have an identification number, attach EPA Form 8700-12 "Notification of Hazardous Waste Activity" to the application.
7. Enter the location or street address of the facility. If the facility lacks a street name or route number, give the most accurate alternative geographic information.
8. Enter the complete mailing address of the facility.
9. Enter the name, title, mailing address and telephone number of an employee who is thoroughly familiar with the operation of the facility and who the Department can contact about the application.
10. Enter the full legal name of the operator if different from number 9.
11. Enter the full mailing address of the operator if different from number 8.
12. If the facility owner and operator are not the same person, enter the name and telephone number of the owner.
13. If applicable, enter the mailing address of the facility owner.

14. Enter an "X" in the appropriate block to indicate the facility's legal structure.
15. If applicable, enter the name of the county and state.
16. If applicable, enter the state of incorporation.
17. If applicable, provide the name and mailing address of all owners.
18. Enter an "X" in the appropriate block, and provide other appropriate information relating to site ownership.
19. Provide the name of the professional engineer who will certify the application along with the registration number and address. If the engineer is associated with a firm, provide the firm's name.
20. Enter an "X" in the appropriate block indicating whether the facility is on Indian land.
21. Provide the type, agency, permit number, date issued, and expiration date of all existing federal, state, and local environmental permits currently held by the facility. If issuance of an environmental permit is pending, indicate the agency and type of permit applied for. If necessary, list additional permit information on a separate sheet of paper.

B. Site Information

1. Enter the county name and the nearest community to the facility. Provide the latitude and longitude, and section, township and range to the approximate geographic center of the facility. Take this information from the most recent USGS topographic map available. Also provide the Universal Transverse Mercator Grid number (UTM #). This is a 15 digit number in the following format: 00/000000/0000000. The first 2 digits are the zone number, the middle 6 digits are the easting and the final 7 digits are the northing.
2. Enter the area in acres of the facility site. A facility site includes all contiguous land and structures, other appurtenances, and improvements on the land used for recycling operations.
3. Attach a topographic map of the area extending one mile beyond the property boundaries of the facility site. The map should have a 1 inch to 2000 feet scale and show the following:
 - a. Map scale and date
 - b. 100-year flood plain area
 - c. Orientation of the map
 - d. Surface water bodies within 1/4 mile of the facility property boundary (e.g., intermittent streams and springs)
 - e. Surrounding land uses
 - f. Legal boundaries of the facility and a map or diagram showing:
 - (1) Access control (fences, gates)
 - (2) Buildings and other structures (recreational areas; access and internal roads; storm, sanitary and process sewerage systems; fire control facilities; etc.)
 - (3) Loading and unloading areas
 - (4) Drainage or flood control barriers
 - (5) Hazardous material clean-up areas

- (6) Runoff control system
- (7) Outside storage area if any

4. Enter an "X" in the appropriate block. As specified in paragraph 62-737.800(3)(b), F.A.C., a facility cannot be located in a 100-year flood plain unless the applicant can provide reasonable assurances that the facility will be constructed to prevent flooding. If your facility is located in a 100-year flood plain, describe how the facility will be constructed to prevent flooding.

C. Land Use Information

1. Enter the present zoning of the site.
2. In those cases where a zoning change is needed, identify the zoning required.
3. Enter the present land use of the site (e.g., agricultural, commercial, residential, industrial, recreational).

D. Operating Information

1. Enter an "X" in the appropriate block. List, in descending order of significance by volume, the types, EPA hazardous waste codes and the amounts of hazardous waste generated annually at the facility.
2. Attach a description of the facility operation including a general description of the facility, the nature of the business, and the activities that it intends to conduct, and the anticipated number and type of employees.
3. Describe the material introduced into the processing equipment or operation and its unit of measure and indicate the maximum daily processing capacity in units for the process used at the facility for one 24-hour day. Show calculations which illustrate the annual capacity of the facility. This shall be demonstrated by manufacturers certification or actual calculations as demonstrated from use of the equipment or process.

Example

PROCESS	DAILY DESIGN CAPACITY	UNIT OF MEASURE	ANNUAL QUANTITY
Storage	5,000	fluorescent lamps	500,000
Mercury recovery	24,000	fluorescent lamps	6,000,000
Mercury recovery	2,000	HID lamps	200,000

4. Indicate the type of material, either processed or unprocessed, which shall be stored at the facility either prior to processing or after processing prior to shipment off site. Indicate the total or maximum amount of each material described which will be present at the facility at any time during the facility operation.

Example:

Fluorescent lamps	10,000 units
Mercury-containing devices	2,000 units (with approximate unit weight under 1 pound)
Separated glass from recovery operations	100 tons
Recovered mercury	200 pounds

5. Attach a copy of the Operational Plan which is a detailed technical description of the process or operation which is proposed. This shall contain engineering plans as necessary. The description should indicate flow of material from receipt through processing and to ultimate destinations of the processed materials. Plans are to include operation, release control and pollution control equipment and measures to minimize employee exposure to hazardous materials. A map or drawing of the facility shall be included which outlines operational areas, storage areas and other active portions of the facility. Data shall be provided which shall demonstrate that the process or equipment employed can remove mercury from the processed material as indicated in 62-737.840 and 62-737.860 F.A.C.
6. Attach a copy of the facility's Contingency Plan conforming to the requirements of 40 CFR 264 Subpart D. This plan shall address the facility's methods to prevent and control releases of hazardous material to the environment. It must also address its plans or methods used in dealing with emergencies such as releases, fires, explosions or floods. The telephone number of the facility's 24-hour emergency coordinator shall be included.
7. Attach a copy of the facility's Worker Health and Safety Plan including training. This shall include measures which the facility shall take to conform to the requirements of Chapter 62-737, F.A.C., to 29 CFR 1910.1200, and 1910.120 and a copy of the facility's hazard communication program.
8. Attach a copy of the facility's Quality Control Plan. This plan shall define how the facility will monitor or evaluate the operational conditions and the facility's conformance to requirements specified in Operating Information 5 through 9. This is to include checklists, logs, or other elements which are required to monitor conformance to Chapter 62-737, F.A.C. Any chemical analyses which are required by Chapter 62-737, F.A.C., should also be specified in the Quality Control Plan approved in accordance with Chapter 62-160, F.A.C. Per paragraph 62-160.300(6), F.A.C., Department written Standard Operating Procedures (SOPs) Manuals (or equivalent procedures in a Department Approved Comprehensive Quality Assurance Plan for sampling and analysis) shall be used for sampling and analysis. the Department has written "Quality Assurance Standard Operating Procedures for Sampling at Facilities Permitted Under Chapter 62-737, F.A.C., November 14, 1997 Revision" for use by mercury recovery and mercury reclamation facilities permitted under Chapter 62-737, F.A.C.
9. Attach a copy of the facility's Closure Plan. This plan must be of adequate detail to describe how the owner or operator shall remove and properly manage all processed, unprocessed and waste material which may be at the facility when the facility is closed. This shall include decontamination of any process areas and equipment. Per paragraph 62-160.300(6), F.A.C., Department written Standard Operating Procedures (SOPs) Manuals (or equivalent procedures in a Department Approved Comprehensive Quality Assurance Plan for sampling and analysis) shall be used for sampling and analysis. the Department has written "Quality Assurance Standard Operating Procedures for Sampling at Facilities Permitted Under Chapter 62-737, F.A.C., November 14, 1997 Revision" for use by mercury recovery and mercury reclamation facilities permitted under Chapter 62-737, F.A.C. A detailed

itemization of the costs and times associated with closure must be included. Closure costs must assume a worst case condition for either voluntary or involuntary closure of the facility. Include the financial mechanism which will be used to provide financial assurance to the Department in the amount required by the closure cost estimates provided. Financial assurance information must be submitted on one of the forms specified in 62-737.800(4), F.A.C.

10. Attach copies of the Facility's certificate of insurance showing coverage in the required amounts specified in 62-737.800, F.A.C.
11. Attach a list and description of the facilities to which you will ship processed or unprocessed material off site. Describe the processes which will be employed by these facilities in utilizing these materials. This shall include processed glass and metal end caps, phosphor powder or reclaimed mercury destined for recycling or disposal. For mercury recovery facility applications, identify the mercury reclamation facility which accepts your material for recovery of the mercury. If this is an out of state facility, include the facility's certification that it can recover 99% of the mercury introduced into its reclamation process as required in 62-737.840(4), F.A.C.
12. Attach a copy of the facility's Inspection Plan. This plan shall include the measures the facility shall take to monitor and inspect the performance of process operations and release or pollution control equipment. Indicate the methods and frequency of these inspections and the types of logs or records which shall be maintained.

**APPLICATION FOR A MERCURY-CONTAINING LAMP OR DEVICE
MERCURY RECOVERY OR MERCURY RECLAMATION FACILITY PERMIT**

Part I

TO BE COMPLETED BY ALL APPLICANTS

Please Type or Print

A. General Information

1. Type of facility:

Mercury Recovery ☒ **[✓]**

Mercury Reclamation ☐ **[]**

Lamps ☒ **[✓]**
Devices ☒ **[✓]**

Lamps ☐ **[]**
Devices ☐ **[]**
Other mercury wastes ☐ **[]**
Commodity grade mercury ☐ **[]**

2. Type of application: ☐ new construction ☒ operation ☐ modification ☐ transfer

3. Revision Number: _____

4. Date current operation began (or is expected to begin): July 6, 2012

5. Facility name: Lighting Resources, LLC

6. EPA/DEP ID. No.: FLR000 070 565

7. Facility location or street address: 1007 SW 16th Lane, Ocala, FL 34471

8. Facility mailing address:

<u>1007 SW 16th Lane</u>	<u>Ocala</u>	<u>Florida</u>	<u>34471</u>
Street or PO. Box	City	State	Zip

9. Contact person: Jason Muhlenkamp Telephone: (352) 509-3001

Title: Branch Manager

Mailing Address:

<u>1007 SW 16th Lane</u>	<u>Ocala</u>	<u>Florida</u>	<u>34471</u>
Street or PO. Box	City	State	Zip

10. Operator's name: Lighting Resources, LLC Telephone: (352) 509-3001

11. Operator's address:

Name: Lighting Resources, LLC

Address:

<u>1007 SW 16th Lane</u>	<u>Ocala</u>	<u>Florida</u>	<u>34471</u>
Street or PO. Box	City	State	Zip

12. Facility owner's name: Lighting Resources, LLC Telephone: (805) 624-3050

13. Facility owner's address:

<u>1919 Williams Street, #350</u>	<u>Simi Valley</u>	<u>California</u>	<u>93065</u>
Street or PO. Box	City	State	Zip

14. Legal structure: ☐ Corporation ☐ Non-profit Corporation ☐ Partnership ☐ Individual
☐ Local Government ☐ State Government ☐ Federal Government ☒ Other (specify)

15. If an individual, partnership, or business is operating under an assumed name, specify the county and state where the name is registered.

County: _____ State: _____

16. If the legal structure is a corporation, indicate the state of incorporation.

State of incorporation: Limited Liability Company- California

17. If the legal structure is an individual or partnership, list the owners' names and mailing addresses.

Name: _____

Address:

_____ Street or PO. Box	_____ City	_____ State	_____ Zip
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Name: _____

Address:

_____ Street or PO. Box	_____ City	_____ State	_____ Zip
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Name: _____

Address:

_____ Street or PO. Box	_____ City	_____ State	_____ Zip
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Name: _____

Address:

Street or PO. Box	City	State	Zip
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18. Site ownership status: ☒ owned ☐ to be purchased ☐ to be leased _____ years

☐ presently leased; the expiration date of the lease is: _____

If leased, indicate:

Land owner's name: _____

Land owner's address:

Name: _____

Address:

Street or PO. Box	City	State	Zip
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19. Name of professional engineer: Eric Kramer, P.E.

Registration no.: Florida Professional Engineer #49462

Address:

Name: Eric Kramer, P.E.

Address:

1228 Winter Garden Vineland	Winter Garden	Florida	34787
Street or PO. Box	City	State	Zip

Associated with: CB&I

20. Facility located on Indian land: ☐ yes ☒ no

21. Existing or pending environmental permits: (attach a separate sheet if necessary)

TYPE OF PERMIT	AGENCY	PERMIT NUMBER	DATE ISSUED	EXPIRATION DATE
AIR	DEP		Oct 13, 2011	N/A
HWT	DEP		Oct 1, 2012	Oct 1, 2013
LQHUW	DEP		Oct 2, 2012	Oct 1, 2013
8700-12FL	DEP	FLR00070565	Oct 11, 2012	N/A

B. Site Information

1. Facility location : County: Marion Nearest Community: Ocala
 Latitude: 29 10' 20.68" N Longitude: 82 08' 48.94" W
 Section: 19 Township: 15 South Range: 22 East
 UTM # 17R / 388478E / 3227606N

2. Area of facility site (acres): approximately 1.33

3. Attach a topographic map of the facility area and a scale drawing and photographs of the facility showing the location of all past, present, and future material receiving, storage and processing areas. Also show the incoming and outgoing material traffic pattern including estimated volume and controls.

4. Is the site located in a 100-year flood plain? ☐ yes ☒ no
 If yes, describe how facility will be constructed to prevent flooding (labeled as Attachment ____).

C. Land Use Information

1. Present zoning of the site. Light Industrial (See Eng Rpt: Sec 2, Figure 3)
 2. If a zoning change is needed, what should the new zoning be?
N/A
 3. Present land use of site
Mercury Recovery Facility

D. Operating Information

1. Is hazardous waste generated on site? ☒ yes ☐ no

List the types and anticipated annual amounts of generation (attach a separate sheet if necessary).

Hazardous Waste Code #D009 Phosphor Powder containing Mercury

312 drums p/year x 750 lbs/drum = 234,000 lbs/year = 117 tons per year

Hazardous Waste Code #D009: Air Filter Media containing Mercury

3.17 tons per year

2. Attach a brief description of the facility operation, nature of the business, and activities.

The Facility is a Mercury Recovery Facility that accepts for processing mercury containing lamps (intact and crushed lamps). The Facility also accepts other universal wastes for transfer only to a reclamation or final destination facility.

3. Specify below each process used for storing or recycling of lamps or devices (including daily design capacities for recycling operations) at the facility, and annual quantities, to be stored or processed at the facility. (Attach a separate sheet if necessary)

PROCESS	DAILY DESIGN CAPACITY	UNIT OF MEASURE	ANNUAL QUANTITY
MCL Recovery	90,000 lamps	90,000 x 312	28.08 Mil

4. Indicate the type of material and total amount of maximum desired storage to be permitted by the facility. This is the maximum amount of raw or unprocessed material, such as lamps or devices, and the total types and amounts of processed material, such as glass or phosphor material, which shall exist at the facility at any time. This shall be the maximum allowed storage by the facility. (attach a separate sheet if necessary)

See page 16 (2 of 2)

5. Attach a description of how the facility shall be constructed and operated and the specifics of the technology which shall be utilized to process or recycle lamps and devices. Include any engineering plans, calculations and other related information describing the process to include the design, installation and operation of any air pollution control equipment. All engineering plans and reports shall be signed and sealed by a professional engineer registered in the State of Florida. Describe the specific types of materials the facility shall accept for introduction into its process. (e.g. fluorescent lamps, electrical thermostats etc.)

Construction and Operation Plans are labeled as Attachment ER - Section 2

6. Attach a description of the facility's Contingency Plan for responding to and dealing with spills or releases of hazardous material to the environment during facility operation or any other emergency conditions. Include the name and 24-hour response telephone number of the facility emergency response coordinator, who is to be contacted in the event of an emergency. Plans should at a minimum conform to the requirements of 40 CFR 264, Subpart D. Attach a description of procedures, structures, or equipment used at the facility to:

- (1) Mitigate effects of equipment failure
- (2) Prevent hazards in unloading operations (e.g., ramps, special forklifts);
- (3) Prevent undue exposure of personnel to hazardous material (e.g., protective clothing);
- (4) Prevent releases to soil, water or the atmosphere; and

Attach a description of the preparedness and prevention procedures including required equipment, testing and maintenance of equipment, access to communications or alarm system, required aisle space, and arrangements with local authorities. Procedures should at a minimum conform to the requirements of 40 CFR 264, Subpart C.

Contingency Plan is labeled as Attachment ER - Section 4

Florida DEP Modification Application
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4.

MCLs Unprocessed 139,104 each or equivalent volume

PCB Light Ballasts: Ten (10) 55-gallon drums or equivalent volume

Batteries: Twenty-four (24) 55-gallon drums or equivalent volume

MCLs Processed/Broken: Fifty-six (56) 55-gallon drums or equivalent volume

Phosphor Powder: Thirty-two (32) 55-gallon drums

MCD: Four (4) 55-gallon drums or equivalent volume

Non-PCB Light Ballasts: Thirty (30) 55-gallon drums or equivalent volume

Clean Lamp Glass (Cullet): Four (4) roll offs x
 $\leq 30,000 = 60$ Tons

Clean Lamp Metals: Sixty (60) 55-gallon drums or equivalent volume

7. Attach a copy of the facility's Worker Health and Safety Plan including training. This plan shall be of sufficient detail to describe how workers will be informed of the hazards present in the workplace and how to protect them from exposure or injury from these conditions. The plan should contain elements to instruct employees in identification of hazards, releases, emergency response conditions and methods to prevent releases of hazardous material.

Worker Health and Safety Plan including training is labeled as Attachment ER - Section 5

8. Attach a copy of the facility's Quality Control Plan to be approved in accordance with Chapter 62-160, F.A.C. This plan should include detailed description of how the facility shall monitor the conformance to the facility's operational plan, training plan, its methods of determining compliance with permit conditions or Chapter 62-737, F.A.C., (e.g., material sampling and analysis) and the performance of its processing equipment or pollution control equipment (if applicable). The plan shall also contain the measures to monitor conformance with the facility's closure plan.

Quality Control plan to be labeled as Attachment ER - Section 6

9. Attach a copy of the facility's Closure Plan. This plan shall be of adequate detail as to describe how the facility shall properly remove all quantities of raw or unprocessed material and processed materials or wastes in the event of either voluntary or involuntary closure or cessation of operations. The plan must also include programs for clean up or decontamination of process equipment and process areas if applicable and any analytical testing which must be performed to determine the adequate removal of hazardous materials. The plan must also include the estimated costs involved in carrying out each aspect of the closure of the facility.

Attach the following information to meet the closure performance standard which requires removing all hazardous wastes and hazardous constituents and controlling, minimizing, or eliminating, to the extent necessary to protect human health and the environment, closure related releases of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the soil, ground water, surface waters or to the atmosphere. The closure plan must include the following information:

- a. A description of how the applicant will close the facility.
- b. An estimate of the maximum inventory of unprocessed and processed materials and wastes on site at any one time over the active life of the facility and a detailed description of the methods to be used during closure. The methods may include methods for removing, transporting, treating, storing, recycling or disposing of all processed and unprocessed materials and all hazardous wastes. Identify the type(s) of the off site recycling or hazardous waste management units the applicant will use, if applicable;
- c. A detailed description of the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures, and soils during closure. The steps include procedures for cleaning equipment and removing contaminated materials, methods for sampling and testing contaminated operational areas of the facility, and criteria for determining the extent of decontamination required to satisfy the closure plan standard;
- d. A schedule for closure of each facility. The schedule must include, at a minimum, the total time required to close each facility and the time required for intervening closure activities which will allow tracking of the progress of final closure ; and

e. A detailed description of the costs of closure. Attach the most recent closure cost estimates for the facility and a copy of the financial mechanism used to establish financial assurance for closure of the facility. The financial information must be submitted using forms specified in 62-737.80-0(4), F.A.C.

Closure Plan is labeled as Attachment ER - Section 7

Financial Assurance Form is labeled as Attachment Appendix G

10. Attach a copy of the documents used to demonstrate both general and pollution liability insurance coverage of at least \$1,000,000 as required in 62-737.800 F.A.C.. Proof of this coverage must be provided to the Department on an annual basis

Certificate of Insurance is labeled Attachment Appendix H

11. Attach a list of the destinations and uses of processed material shipped off site for disposal or recycling. This is to include the markets for recycled glass or metal end caps or the recovered mercury from reclamation operations. For mercury recovery facility applications, identify the mercury reclamation facility which accepts your material for recovery of the mercury. If this is an out of state facility, include the facility's certification of compliance to the provisions identified in 62-737.840 (4), F.A.C.

List of Destinations Facilities and Uses labeled as Attachment ER - Section 3

12. Attach a copy of the facility's Inspection Plan. This plan shall include the measures the facility shall take to monitor and inspect the performance of process operations and pollution control equipment. Indicate the methods and frequency of these inspections and the types of logs or records which shall be maintained.

Inspection Plan is labeled as Attachment ER - Section 8

**APPLICATION FOR A MERCURY-CONTAINING LAMP OR DEVICE
MERCURY RECOVERY OR MERCURY RECLAMATION FACILITY PERMIT**

Part II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

Facility Name: Lighting Resources, LLC EPA ID# FLR 000 070 565

1. Operator

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, Chapter 62-737, F.A.C., and all rules and regulations of the Department of Environmental Protection. It is understood that the permit is only transferable in accordance with Chapter 62-737, F.A.C., and, if granted a permit, the Department of Environmental Protection will be notified prior to the sale or legal transfer of the permitted facility.



Signature of the Operator or Authorized Representative*

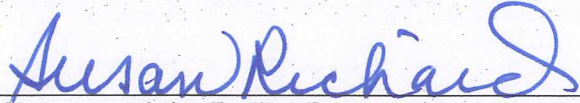
Susan Richard, Chief Compliance Officer
Name and Title (Please type or print)

Date: 1/1/2017 Telephone : (909) 923-7252

*** If authorized representative, attach letter of authorization.**

2. Facility Owner

This is to certify that I understand that this application is submitted for the purpose of obtaining a permit to construct, or operate a mercury-containing lamp or device mercury recovery or mercury reclamation facility . As owner of the facility, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, Chapter 62-737, F.A.C. and all rules and regulations of the Department of Environmental Protection.



Signature of the Facility Owner or Authorized Representative*

Susan Richard, Chief Compliance Officer

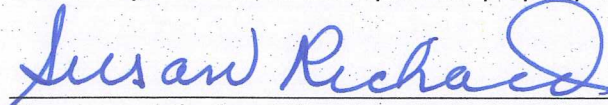
Name and Title (Please type or print below signature)

Date: 1/1/2017 Telephone: (909) 923-7252

*** If authorized representative, attach a letter of authorization**

3. Land Owner

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit to construct or operate a mercury-containing lamp or device mercury recovery or mercury reclamation facility on the property as described.



Signature of the Land Owner or Authorized Representative*

Susan Richard, Chief Compliance Officer

Name and Title (Please type or print)

Date: 1/1/2017 Telephone: (909) 923-7252

*** If authorized representative, attach letter of authorization.**

4. Professional Engineer Registered in Florida

This document is an original from the previous modification, as there have been no changes to the engineering principles applicable to such facilities.

However, if we need a new Certification, we will ask for Eric K. Kramer to again do a certification.

4. Professional Engineer Registered in Florida

[Complete when not exempted by Chapter 62-737, F.A.C.]

This is to certify that the engineering features of this mercury-containing lamp or device mercury recovery or mercury reclamation facility have been designed and examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

Eric K Kramer

Signature

Eric Kramer, P.E.

Name (please type)

Florida Registration Number: # 49462

Mailing Address: 1228 Winter Garden Vineland

Street or PO. Box

Winter Garden

FL

24787

City

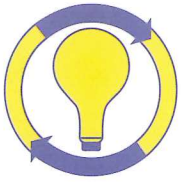
State

Zip

Date: 06/20/2013 Telephone(407) 287-3216

[PLEASE AFFIX SEAL]

12-4-13



LIGHTING RESOURCES, LLC

1919 Williams St., Suite 350
Simi Valley, CA 93065
(805) 624-3050 • Fax (805) 285-0659



January 1, 2017

Florida Department of Environmental Protection

RE: Letter of Authorization

Lighting Resources, LLC as Operator of the Facility, Facility Owner, and Land Owner hereby appoint Susan Richard, Chief Compliance Office of Lighting Resources, LLC to be an Authorized Representative to act on our behalf with respect to the Modification of our existing permit under FLR000070565.

Sincerely,

Daniel P. Gillespie, President