

From: [Buselli, Bradley](#)
To: [Buselli, Bradley](#)
Subject: FW: Lighting Resources Florida - Update
Date: Wednesday, January 8, 2020 12:37:31 PM

For oculus.

From: White, John
Sent: Thursday, December 5, 2019 3:14 PM
To: Perrigan, Glen <Glen.Perrigan@FloridaDEP.gov>; Walker, Kim (Waste) <Kim.Walker@FloridaDEP.gov>
Cc: Rothenberger, Miranda <Miranda.Rothenberger@FloridaDEP.gov>; Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>; Smith, Michell M. <Michell.M.Smith@dep.state.fl.us>; Russell, Merlin <Merlin.Russell@dep.state.fl.us>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Subject: Lighting Resources Florida - Update

Good Afternoon,

I was able to go by Lighting Resources in Ocala today. The room containing the Balcan lamp processing equipment was damaged and the equipment was severely damaged. Facility representatives estimate it could be March 2020 before the facility could be up and running again due to the damage. It is very possible the Balcan Processing Equipment must be replaced. All wiring and connections appear to have melted. If it must be replaced, all the equipment will be shipped as hazardous waste. Lamps had been staged in the room to begin processing after the holiday weekend. It is expected all the materials that were in the room during the fire will be shipped as hazardous waste.

Because of this, the facility is going to have to operate as a pass-through facility until it can rebuild/replace the processing equipment. So it will essentially operate as a large quantity handler of universal waste. I have asked the facility to let us know if/when they violate the storage limit for lamps, 45 tons or 139,104 T-12 lamps. It will take them some time to reorganize the management of lamps and obtain contracts with down-stream vendors for the temporary operations.

What I need to know is the following:

Is it possible for the Department to acknowledge that the facility, until such time as the equipment is replaced, will be operating as a large quantity handler of universal waste subject to regulation under 40 CFR 273 Subpart C standards?

This will allow the temporary exceedance of the storage volume limit, not the time limit of 1 year, to allow the facility to obtain temporary agreements for the handling of universal waste lamps by down-stream vendors.

We would require periodic updates to let us know the status of cleanup and repair operations.

Once the repairs are complete, the facility will have to update the permit application with

information regarding any new equipment that has been installed and any new procedures that will be required.

Please let me know what you think so I can get the facility a response as quickly as possible.

Thank you,

John

From: Susan Richard <susan.richard@lightingresourcesinc.com>
Sent: Friday, November 29, 2019 4:15 PM
To: White, John <John.White@dep.state.fl.us>
Cc: Buff Fritz <buff.fritz@lightingresourcesinc.com>; Rothenberger, Miranda <Miranda.Rothenberger@FloridaDEP.gov>; Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>; Smith, Michell M. <Michell.M.Smith@dep.state.fl.us>; Russell, Merlin <Merlin.Russell@dep.state.fl.us>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Subject: RE: Lighting Resources Florida

John,

We have attached a response to your items from the email.

We expect to move forward next week with the electricity issue and hazardous waste cleaning.

Thursday works for us. We look forward to your visit and your support to work through the restore process over the coming months.

Susan/Buff

Susan Richard

Chief Compliance Officer

Lighting Resources, LLC

805 East Francis Street

Ontario, CA 91761

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o. 909-923-7252

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From: White, John <John.White@dep.state.fl.us>
Sent: Friday, November 29, 2019 6:49 AM
To: Susan Richard <susan.richard@lightingresourcesinc.com>
Cc: Buff Fritz <buff.fritz@lightingresourcesinc.com>; Rothenberger, Miranda <Miranda.Rothenberger@FloridaDEP.gov>; Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>; Smith, Michell M. <Michell.M.Smith@dep.state.fl.us>; Russell, Merlin <Merlin.Russell@dep.state.fl.us>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Subject: RE: Lighting Resources Florida

Susan,

I am sorry to hear about the fire. I am glad no one was injured. I see there was a report to the State Watch Office. Below is the permit requirement, Part I General and Standard Conditions, Condition 12, that would cover this incident. The email would be considered the initial 24 hour notice. I will forward a copy of the email and the state watch office notification to the Permitting Section in Tallahassee. The written report can be in the form of an email and it does not require a lengthy response, it can be short and to the point. Bheem can probably let you know if he will require anything more specific.

If you have any questions or if any problems arise, please let me know.

John

12. The Permittee shall comply with the following notification and reporting requirements.

b. The Permittee will report any event requiring emergency response or noncompliance that may endanger human health or the environment from fires and explosions or releases of hazardous waste that may endanger public drinking water supplies. The Permittee will report to the Department verbally within 24 hours, and provide a written report of the incident to the Hazardous Waste Program & Permitting Section at the address in Part I.15 or by alternate means (*e.g.*, e-mail) as approved by the Department, within five calendar days. It is the responsibility of the Permittee to ensure receipt of the written report. The Department of Environmental Protection's 24-hour emergency telephone number is (850) 413-9911 or (800) 320-0519. During normal business hours, the DEP District Office may be contacted at (407) 897-4100 (Orlando).

(1) The verbal report shall include the following information.

- (a) The name, address, I.D. number, e-mail address, and telephone number of the facility and its owner or operator.
- (b) The date, time, and type of incident.
- (c) The identity and quantity of materials involved.
- (d) The extent of any injuries.
- (e) An assessment of actual or potential hazards.
- (f) The estimated quantity and disposition of recovered materials.

(2) The written report shall include all of the information in the verbal report and the following information.

- (a) A description and cause of the noncompliance.
- (b) If not corrected, the expected time of correction, and the steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

John White
Environmental Consultant



Compliance Assurance Program
Central District
john.white@floridadep.gov
Office: 407.897.4305

From: Susan Richard <susan.richard@lightingresourcesinc.com>

Sent: Thursday, November 28, 2019 9:54 AM

To: White, John <John.White@dep.state.fl.us>

Cc: Buff Fritz <buff.fritz@lightingresourcesinc.com>

Subject: Lighting Resources Florida

Hi John,

I am sorry to tell you that the Florida facility has had a fire in the Balcan Room. The fire is out and contained in the Balcan Room. The building was not occupied at the time.

We will update you further as details become available.

Susan

Susan Richard

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