

From: [Susan Richard](#)
To: [White, John](#)
Cc: [Buff Fritz](#); [Rothenberger, Miranda](#); [Smith, Michell M.](#); [Russell, Merlin](#); [Buselli, Bradley](#); [Nick Nastav](#)
Subject: RE: Lighting Resources Florida
Date: Wednesday, January 8, 2020 7:50:42 PM

Hi John,

We are planning to talk to the insurance company again tomorrow to finalize our expectations.

As of now – please see answers below...

Susan Richard

Chief Compliance Officer

Lighting Resources, LLC

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Ontario, CA 91761

Susan.richard@lightingresourcesinc.com

o. 909-923-7252

d. 909-923-3132

c. 949-300-7559

From: White, John <John.White@dep.state.fl.us>
Sent: Wednesday, January 8, 2020 7:28 AM
To: Susan Richard <susan.richard@lightingresourcesinc.com>
Cc: Buff Fritz <buff.fritz@lightingresourcesinc.com>; Rothenberger, Miranda <Miranda.Rothenberger@FloridaDEP.gov>; Smith, Michell M. <Michell.M.Smith@dep.state.fl.us>; Russell, Merlin <Merlin.Russell@dep.state.fl.us>; Buselli, Bradley <Bradley.Buselli@dep.state.fl.us>
Subject: RE: Lighting Resources Florida

Good Morning,

I am following up on the fire response. On November 29, 2019, you provided an initial response regarding the nature of the incident as required by the permit. Now that some time has passed I need additional information.

Please provide an update on the status of the facility that includes the following:

- What is the status of the processing equipment, is it expected to be repaired or replaced?
[Expect to replace the machine.](#)
 - Please include an anticipated date the facility will return to normal operations.
[Machine manufacture takes 6 months – therefore April or May](#)
- What is the status of cleanup of the processing room?
 - If any waste has been removed from the facility, please provide copies of analytical results and shipping papers documenting removal and disposal of the wastes. [We have been waiting on final decisions from the various individuals sent in by the insurance company. Hopefully we will have decisions shortly.](#)

- Does the facility have gutters and downspouts that may have concentrated any contaminants released to the facility roof as a result of stormwater runoff? [The only gutters are on the north end of the processing room and east side of warehouse C. No gutters on west side of processing room \(side fire was on\).](#)

It is my understanding that, due to the damage to the processing equipment, Lighting Resources is currently operating as a large quantity handler (LQH) of universal waste and working under the requirements identified in 40 CFR Part 273 Subpart C – Standards for Large Quantity Handlers of Universal Waste. Because the permit includes a maximum volume limit for mercury containing lamps and devices, 139,104 T-12 lamps or 45 tons equivalent volume, there is a chance the facility will exceed this volume. Part I – General and Standard Conditions, condition 12 of the permit requires notification of any non-compliance with the permit.

If the facility is expected to exceed the permitted volume limit please ensure you provide written notification to the Department that includes a description and cause of the non-compliance and the expected period of non-compliance. Also, include steps being taken to reduce and eliminate the non-compliance. This may be a reiteration of the information requested above.

[The facility is currently renting trailers to place pallets in prior to shipment to the Lighting Resources Fort Worth Facility or moving the material directly from the warehouse to the Transport Vendor. As this is a constant process we do expect that at various times there is a chance we may exceed the 45 ton limit \(approximately 197 pallets\). However, as the Transport Vendor pulls approximately 52 pallets from inventory with each days shipment it is difficult to be very specific. In addition there have been multiple transfers on some days.](#)

[Should we consider this a notice of possible non-compliance going forward or how should we handle it. In checking today with Nick Nastav, he feels that we have not been over the pallet limit at all with all the transfers. The warehouse, however, also has other material that is being accumulated for full trailer load shipment to other downstream vendors.](#)

[After speaking with the insurance contact, we will update with more specific plans. Thanks.](#)

If you have any questions, please let me know.

Thank you,

John



John White
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Office: 407.897.4305

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

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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.



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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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