



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Lighting Resources LLC
On-Site Inspection Start Date: 12/05/2019 **On-Site Inspection End Date:** 12/05/2019
ME ID#: 40403 **EPA ID#:** FLR000070565
Facility Street Address: 1007 SW 16th Ln, Ocala, Florida 34471
Contact Mailing Address: 1007 SW 16th Lane, Ocala, Florida 34471
County Name: Marion **Contact Phone:** Data is missing from FIESTA

NOTIFIED AS:

LQG (>1000 kg/month), TSD Facility, Transporter

WASTE ACTIVITIES:

Generator: LQG **Other Status:** Offsite Waste Received **Transporter:** Commercial Waste **TSD:** Treater
Universal Waste: Indicate types of UW generated and/or accumulated at the facility:
Generate/Accumulate: Batteries, Mercury Containing Lamps, Mercury Containing Devices **Transport:** Mercury
Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any
time:** 5000 kg or more; Large Quantity Handler (LQH), Mercury containing devices (LQH) - 100kg or more
accumulated, Mercury containing lamps (LQH) - 2000kg or more accumulated **Destination Facility for UW
Mercury Recovery and/or Reclamation**

INSPECTION TYPE:

Pre-Arranged Inspection for TSD Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: John E. White, Inspector
Other Participants: Buff Fritz, Branch Manager; Susan Richard, Chief Compliance Officer

LATITUDE / LONGITUDE: Lat 29° 10' 20.7785" / Long 82° 8' 49.0004"

NAIC: 562111 - Solid Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On December 5, 2019, John White, Florida Department of Environmental Protection, inspected Lighting Resources for compliance with state and federal hazardous waste regulations. Lighting Resources was represented by Buff Fritz, Branch Manager, and Susan Richard, Chief Compliance Officer. The compliance evaluation inspection was conducted in response to a fire on November 28, 2019 in the Balcan Room, where lamp processing equipment is located.

Lighting Resources employs 23 people with operating hours from 8 AM to 5 PM, Monday to Friday, for office personnel and in two shifts from 6 AM to 11 PM, Monday to Friday, for processing personnel. Lighting Resources has three drivers and operates one semi and two straight trucks. The trucks are leased from Penske and Penske provides maintenance services. Lighting Resources is connected to the municipal wastewater collection and potable water systems.

Process Description:

The fire began at approximately 8:30 AM on November 28, 2019 and involved approximately 5-10 pallets of spent lamps in fiber drums. The fire started near the center of the north wall in the lamp processing room, referred to as the Balcan Room, after the name of the processing equipment. All containers on the north side of the room were destroyed. The processing equipment wiring and components were severely damaged by the fire.

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Walls and portions of the roof on the north side of the room were damaged and will require repair. Drums along the west and south walls were not severely damaged.

It was requested Lighting Resources ensure all materials removed from the room are properly sampled and characterized prior to disposal. On January 29, 2020, the results of debris sampling was provided to the Department. The results indicate wipes from the Balcan Machine, wipes of the floor, fire debris, and bulb ends do not exhibit a hazardous waste characteristic of toxicity for heavy metals identified in 40 CFR 261.24. Waste results for insulation from the room were inconsistent. Total waste results for heavy metals in the insulation debris found cadmium present at 2.8 mg/kg. The TCLP results for the waste found 1.0 mg/L, indicating it exhibits a hazardous waste characteristic of toxicity for cadmium. The facility was asked to resample the insulation debris ensuring a representative sample is obtained.

Currently, Lighting Resources is operating as a large quantity universal waste handler. Universal waste is passing through the facility without processing. This activity will continue until the processing equipment can be repaired or replaced.

Conclusion:

Lighting Resources was inspected in response to a fire on November 28, 2019 and no violations were cited at this time. Upon completion of repair or replacement of equipment, Lighting Resources will need to ensure the RCRA permit is updated, if necessary.

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1.0: Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

Inspection Date: 12/05/2019

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

John E. White**Principal Investigator Name**Inspector**Principal Investigator Title**JW**Principal Investigator Signature**DEP**Organization**02/05/2020**Date**Buff Fritz**Representative Name**Branch Manager**Representative Title**Lighting Resources**Organization**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Susan Richard**Representative Name**Chief Compliance Officer**Representative Title**Lighting Resources**Organization**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:**Approver:** Daniel K. Hall**Inspection Approval Date:** 02/05/2020