

Thursby, Kim

From: Susan Richard <susan.richard@lightingresourcesinc.com>
Sent: Wednesday, January 26, 2022 1:15 PM
To: Thursby, Kim
Subject: RE: Lighting Resources, LLC;FLR 000 070 565;First Request for Additional Information (RAI)

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Thanks. We have received this document.

Susan Richard

Chief Compliance Officer
Lighting Resources, LLC
805 East Francis Street
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From: Thursby, Kim <Kim.Thursby@FloridaDEP.gov>
Sent: Monday, January 24, 2022 9:59 AM
To: Susan Richard <susan.richard@lightingresourcesinc.com>
Cc: Smith, Michell M. <Michell.M.Smith@FloridaDEP.gov>; Walker, Kim (Waste) <Kim.Walker@FloridaDEP.gov>; 'bastek.brian@epa.gov' <bastek.brian@epa.gov>; 'merizalde.carlos@epa.gov' <merizalde.carlos@epa.gov>; Echevarria, Edgar <Edgar.Echevarria@FloridaDEP.gov>; Rothenberger, Miranda <Miranda.Rothenberger@FloridaDEP.gov>; Buff Fritz <buff.fritz@lightingresourcesinc.com>; Buselli, Bradley <Bradley.Buselli@dep.state.fl.us>
Subject: Lighting Resources, LLC;FLR 000 070 565;First Request for Additional Information (RAI)

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Michell Mason Smith
Environmental Administrator
Hazardous Waste Program & Permitting



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FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

REQUEST FOR ADDITIONAL INFORMATION

January 24, 2022

Susan Richard, Chief Compliance Officer
Lighting Resources, LLC
1007 SW 16th Lane
Ocala, Florida 34471
susan.richard@lightingresourcesinc.com

Re: **First Request for Additional Information (RAI)**
Lighting Resources, LLC
EPA ID Number: FLR 000 070 565
Current Operating Permit: 309339-003-HO
DEP Application Number: 309339-004-HO
Marion County – Hazardous Waste

Dear Ms. Richard:

Thank you for your revised application for an Operating Permit Renewal for the above referenced Facility. A Department staff review of the application submitted on January 10, 2022, indicates the application is incomplete. Pursuant to the provisions of Rules 62-730.220 & 62-737.800, Florida Administrative Code (F.A.C.) and Chapter 403.722, Florida Statutes (F.S.), all processing of the application is suspended when a permit application is deemed incomplete. Please provide the information listed below in a revised permit application and refer to this correspondence in your response.

1. Part I., Application Form: Please provide clarification or revisions. If necessary, a revised DEP Form 8700-12FL¹ can also be submitted following the form instructions.
 - a. I.A.21 (PDF page 16/431): The current 8700-12 on file dated January 15, 2019.
 - b. I.D.1 (PDF page 17/431): The only waste code listed is D009 (Mercury); this code is also addressed in ER-Section 3.16 of the application. However, Section 10 of the 8700-12 on file also lists D006 (Cadmium) and D008 (Lead). These additional codes are not described within the permit application. Please ensure all applicable materials (listed on Table 3-3) with waste codes are represented on the Part A / 8700-12 and described in the application, as appropriate.
 - c. I.D.5 (PDF page 18/431): This item should refer to ER-Section **3**.
2. ER-Section 3.3 (PDF Page 49/431): This section should refer to 40CFR264 Subpart **B**.

¹ A current version of the 8700-12FL can be located at the following link: <https://floridadep.gov/waste/permitting-compliance-assistance/forms/8700-12fl-florida-notification-regulated-waste-activity>.

3. ER-Section 3.4, Personnel Training (PDF Page 51/431): This section should refer to 40CFR264.16 (text currently references 40CFR265).
4. ER-Section 5.6, Initial New Employee Training (PDF Page 88/431): See comment 3.
5. ER-Section 7.5 & Appendix F, Closure Cost Estimate (PDF Page 99/431): The text indicates the closure cost estimate is adjusted annually for inflation. Please note that Table 7-3 does not appear to present these costs in current dollars. In addition, there are two versions of this table (in both Section 7.5 and App. F) with different estimated amounts and dates. Please provide revised cost estimate information and ensure that the Financial Assurance mechanism is updated to reflect any changes, if necessary.
6. Table 3-3, Maximum Storage Quantities: Please provide a stand-alone table (currently split between two pages within the application text) for insertion into the Draft Permit.
7. Drawing D-2, Site Plan: Please provide a stand-alone figure (unable to extract high-resolution pages from the PDF) for insertion into the Draft Permit.

In order for the Department to continue processing your application, please submit the information requested as soon as possible, and refer to this correspondence in your response. The response must be signed, sealed, and dated by a registered Florida Professional Engineer. The Department must receive a response within 30 days of the date of this letter, or February 23, 2022, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to subsection 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application.

Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to bradley.buselli@floridadep.gov. If the file is very large, you may post it to a folder on this office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/DWM/Lighting Resources](ftp://ftp.dep.state.fl.us/pub/incoming/DWM/Lighting%20Resources). After posting the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to bradley.buselli@floridadep.gov, alerting us that it has been posted.

If you have any questions, please contact Bradley Buselli by telephone at 850-245-8989 or by e-mail at bradley.buselli@floridadep.gov.

Sincerely,



Michell Mason Smith, Environmental Administrator
Hazardous Waste Program & Permitting

cc:

Brian Bastek, EPA Region 4, bastek.brian@epa.gov
Carlos Merizalde, EPA Region 4, merizalde.carlos@epa.gov
Edgar Echevarria, DEP Headquarters, edgar.echevarria@floridadep.gov
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