



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

FACILITY INFORMATION:

Facility Name: Envirolight and Disposal Inc
On-Site Inspection Start Date: 01/28/2022 **On-Site Inspection End Date:** 01/28/2022
ME ID#: 149671 **EPA ID#:** FLR000252361
Facility Street Address: 3300 28th St N, St Petersburg, Florida 33713-1601
Contact Mailing Address: PO Box 26047, Tampa, Florida 33623-6047
County Name: Pinellas **Contact Phone:** (727) 526-8870

NOTIFIED AS:

Non-Handler, Transfer Facility

WASTE ACTIVITIES:

Generator: Non-Handler **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Transport:** Batteries, Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Batteries, Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** 5000 kg or more; Large Quantity Handler (LQH)

INSPECTION TYPE:

Routine Inspection for Transfer Facility Facility
Routine Inspection for Universal Waste Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Leslie Pedigo, Inspector
Other Participants: David Petti, Environmental Specialist II; Bill Norman, President and Registered Agent

LATITUDE / LONGITUDE: Lat 27° 48' 9.3096" / Long 82° 40' 18.6708"

NAIC: 562119 - Other Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

Envirolight and Disposal, Inc., ("Envirolight") was inspected the Florida Department of Environmental Protection ("Department") on January 28, 2022, to evaluate the facility's compliance with state and federal universal waste regulations. The facility had previously operated at 3200 44th Avenue North, St. Petersburg under Facility ID #FLR000089185. This is the first inspection of this facility. Bill Norman, President and Registered Agent of Envirolight & Disposal, Inc., assisted the inspectors throughout the inspection.

NOTIFICATION AND REGISTRATION

Envirolight moved to the 3300 28th Street North, St Petersburg location in August of 2020. However, the facility did not provide initial notification to the Department as a Universal Waste Lamp and Device Transporter and Handler at this address until July 8, 2021. On January 21, 2022, the facility provided a second notification along with their registration fee as a new location for Universal Waste Lamp and Device Transporter and Handler. On February 25, 2022, the facility was issued registration as a Transporter of Universal Waste Lamps and Devices, Transfer Facility of Universal Waste Lamps, Transfer Facility of Universal Waste Devices, and Large Quantity Handler Facility for Universal Waste Lamps and Devices.

Process Description:

Envirolight, which operated a large quantity handler mercury containing lamp and device consolidation facility, moved to this location in August of 2020. Currently the business manages spent mercury lamps and devices, universal waste batteries, and electronic equipment recycling. The 1.14-acre property has been owned by

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Covenant Resources International USA, Inc. since June 3, 2020. The property contains four adjoining buildings totaling 16,140-square feet. The facility has six employees and the business hours are 8:00 a.m. to 5:00 p.m., Monday through Friday. Water and sewer services were provided by the City of St Petersburg.

TRANSPORTATION

The facility operates two 26-foot box trucks which are dispatched to customer locations to collect universal wastes. Envirolight opens boxes and drums of spent mercury lamps (typically 55-gallon fiber cardboard drums) at the generator location prior to loading to verify number of lamps for shipping papers. Lamps are tracked by the actual number of each type of lamp shipped rather than by number of containers or weight of lamps. Drivers are instructed to only pick up broken lamps that have been bagged by the customer. Other universal wastes are also containerized prior to being transported.

OFFICES

The building at this location has been modified specifically for their operations. The office is located at the front of the building and all flooring is hard surface, no carpeting is present. The office is on an air handling system while the warehouse is unairconditioned.

WAREHOUSE

Warehouse flooring is epoxy sealed concrete. There is a single open area with two overhead doors, one on the north and one on the south which are kept open during operating hours to provide cross ventilation. A large fan is located at the west end of the warehouse.

Wastes collected from customers is brought back to the facility. Containerized spent mercury lamps are put immediately into storage. Ballasts and universal waste batteries are initially placed in the Universal Waste Batteries Sorting Area adjacent to the north overhead door. Universal waste batteries are removed from smaller containers, sorted by type, and then placed into large containers, typically 55-gallon metal drums. Ballast and other mercury containing devices are consolidated into large containers, typically 55-gallon metal drums.

Handling and Storage of Spent Mercury Lamps and Mercury Devices:

Spent mercury lamps and devices are stored in northeast corner of the warehouse. All the containers were labeled, dated, and appear to be in good condition. Spent mercury lamps are sent to Lighting Resources, LLC, in Ocala, Florida (EPA ID #FLR000070565). At the time of the inspection, the following full containers of spent mercury lamps and devices were present:

- Numerous boxes and cardboard fiber drums of spent mercury lamps.
- One 35-gallon polypropylene drum of lamp caps.
- One 55-gallon metal drum of waste ballasts.
- One 55-gallon metal drum waste non-PCB transformers.
- Two 5-gallon buckets of waste thermostats.
- One 2.5-gallon bucket of waste thermostats.

Handling and Storage of Universal Waste Batteries:

Full containers of universal waste batteries are located on the south wall of the warehouse. Any universal waste batteries found to be leaking are bagged. All containers were labeled, dated, and are in good condition. Universal waste batteries are sent to Battery Solutions, LLC, in Wixom, Michigan. At the time of the inspection, the following full containers of universal waste batteries were present:

- Sixteen 55-gallon metal drums of spent carbon zinc/alkaline batteries.
- Three 55-gallon metal drums of spent lithium ion batteries
- Thirty small boxes and one 5-gallon bucket of spent lithium batteries.

While the facility can handle nickel metal hydride, nickel cadmium, and lead acid batteries, none were present at the time of the inspection.

Handling and Storage of Waste Electronics:

The hard drives and batteries are removed from waste electronics in the Battery Sorting Area; waste batteries

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are then placed into the appropriate sorting drum for disposal. The waste electronics are then placed onto pallets or boxes for storage. Waste electronics are sent to either Electronic Recycling, Miami or Urban E Recycling, Inc., Tampa for further processing.

A number of boxes of LED lights were being stored on the covered porch located on the southside of the building while the facility determines the proper disposal for this non-hazardous and non-universal waste type of lighting.

SAFETY

The facility has several fire extinguishers located throughout the building and an inspection has been scheduled with the local fire department for the week of January 1 through February 4, 2022, to determine if additional fire extinguishers will be needed. Spill kits, which contain suction cups, Ziplock bags and mercury magnum powder, were present.

RECORDS

- Bills of lading for collection and disposal were available for review during the inspection and appeared to be in order.
- Training: The facility conducts annual training on mercury spill cleanup for existing employees and for new employees when hired.
- Operations Plan: The facility submitted their contingency plan on February 22, 2022.
- Closure Plan: The facility submitted their Closure Plan on February 22, 2022.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	273.32(a)(1)
Explanation:	Envirolight moved to the 3300 28th Street North Avenue North, St Petersburg location in August of 2020. However, the facility did not provide notification to the Department of this move until July 8, 2021.
Corrective Action:	40 CFR 273.32(a)(1) requires that except as provided in paragraphs (a) (2) and (3) of this section, a large quantity handler of universal waste must have sent written notification of universal waste management to the Regional Administrator, and received an EPA Identification Number, before meeting or exceeding the 5,000 kilogram storage limit. Corrected: The facility initially notified as a Universal Waste Lamp and Device Transporter and Handler at 3300 28th Street North Avenue North, St Petersburg on July 8, 2021. Moving forward, the facility shall ensure proper notification is provided to the Department.
Type:	Violation
Rule:	62-737.400(3)(a)
Explanation:	Envirolight moved to the 3300 28th Street North Avenue North, St Petersburg location in August of 2020. However, the facility did not submit a Large Quantity Handler and Transporter of Spent Universal Waste Lamps and Devices register documents and fees until January 21, 2022 and did not submit an Operational Plan or a Closure Plan until February 22, 2022.
	Rule 62-737.400(3)(a)2., F.A.C., requires that before beginning operations and annually thereafter by March 1, a handler or a transporter of spent universal waste lamps or

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devices shall register by notifying the Department of its intent to be a handler or transporter or to operate a reverse distribution program, and certifying that it has employee training procedures in place for the proper handling, emergency response, and containment and cleanup of its spent universal waste lamps or devices.

Rule 62-737.400(3)(a)3.a., F.A.C., requires that a one-time registration fee of one thousand dollars for each separate facility location registration be submitted to the Department.

Rule 62-737.400(3)(a)3.b., F.A.C., requires that a Large Quantity Handler and Transporter of Spent Universal Waste Lamps and Devices develop and submit to the Department, along with its registration, an operational plan including a description of its general housekeeping measures, employee training program, methods to prevent breakage or releases, and its methods for responding to releases of universal lamps or devices or their components.

Rule 62-737.400(3)(a)3.c., F.A.C., requires that a Large Quantity Handler and Transporter of Spent Universal Waste Lamps and Devices submit closure plan including financial assurance as specified in paragraph 62-737.800(4)(g).

Corrective Action: Corrected: The facility submitted Large Quantity Handler and Transporter of Spent Universal Waste Lamps and Devices register documents and registration fees on January 21, 2022. The facility provided an Operation Plan and a Closure Plan on February 22, 2022. Moving forward, the facility shall ensure timely registration is provided to the Department.

PHOTO ATTACHMENTS:

Universal Waste Batteries Sorting Area



Spent Mercury Lamps and Devices Storage Area



Mercury Devices Storage Containers



Universal Waste Batteries Storage Area



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Waste Electronics Storage Area



Waste Electronics Processing Area



Scrap Metal Collection Container



Waste LED Light Storage Area



Conclusion:

While the facility was not in compliance with state and federal universal waste regulations, the facility has provided corrective actions and is now in compliance.

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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.

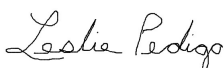
Note: Checklist items with shaded boxes are for informational purposes only.

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			✓

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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

Leslie Pedigo	Inspector	
Principal Investigator Name	Principal Investigator Title	
	DEP	03/30/2022
Principal Investigator Signature	Organization	Date
David Petti	Environmental Specialist II	
Inspector Name	Inspector Title	
	FDEP/SWD	
	Organization	
Bill Norman	President and Registered Agent	
Representative Name	Representative Title	
	Envirolight & Disposal, Inc.	
	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:	Shannon Lenhart	Inspection Approval Date:	03/30/2022
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