Eckoff, Michael

From: Parham, Rayfus <Parham.Rayfus@epa.gov>
Sent: Friday, October 20, 2023 11:20 AM
To: buff.fritz@lightingresourcesinc.com
Cc: Eckoff, Michael; Gregg, Jeff; Hall, Daniel K.; Mallick, Parvez; Hendrix, Corey; Relon, Mark Anthony
Subject: Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) Lighting Resources LLC EPA ID: FLR000070565
Attachments: CEI Cover Letter to Facility.pdf; Lighting Resources CEI Report.pdf

Dear Buff Fritz:

On August 8, 2023, the U.S. Environmental Protection Agency (EPA), along with the Florida Department of Environmental Protection (FDEP) conducted a CEI at Lighting Resources LLC located in Ocala, Florida to determine the facility's compliance status with RCRA and applicable regulations.

Ray Parham
Administrative Staff Assistant, Technical Support Branch
US EPA | Region 4 | Enforcement and Compliance Assurance Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

ELECTRONIC MAIL
CONFIRMATION OF RECEIPT EMAIL REQUESTED

Buff Fritz
Branch Manager
Lighting Resources LLC
1007 SW 16th Ln
Ocala, FL 34471
buff.fritz@lightingresourcesinc.com

SUBJ: Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
Lighting Resources LLC
EPA ID: FLR000070565

Dear Buff Fritz:

On August 8, 2023, the U.S. Environmental Protection Agency (EPA), along with the Florida Department of Environmental Protection (FDEP) conducted a CEI at Lighting Resources LLC located in Ocala, Florida to determine the facility's compliance status with RCRA and applicable regulations.

Enclosed is the EPA RCRA Inspection Report which indicates that deficiencies of RCRA were discovered during the inspection. A copy of this report has been forwarded to the FDEP for follow-up and further review.

If you have any questions regarding this matter, please contact Mark Anthony Relon, of my staff, by phone at (404) 562-9069 or by email at relon.markanthony@epa.gov.

Sincerely,

Araceli B. Chavez
Chief
RCRA Enforcement Section

Enclosure

cc: Michael Eckoff, FDEP, michael.eckoff@floridadep.gov
Jeff Gregg, FDEP, jeff.gregg@floridadep.gov

Daniel Hall, FDEP, daniel.k.hall@floridadep.gov
Parvez Mallick, EPA, mallick.parvez@epa.gov
Corey Hendrix, EPA, hendrix.corey@epa.gov
Mark Anthony Relon, EPA, relon.markanthony@epa.gov

RCRA Inspection Report

1) Inspector and Author of Report

Mark Anthony Relon
Environmental Engineer
Phone: 404-562-9069
relon.markanthony@epa.gov

Parvez Mallick
Environmental Engineer
Phone: 404-562-8594
Parvez.Mallick@epa.gov

U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

Lighting Resources LLC
1007 SW 16th Ln
Ocala, FL 34471

EPA ID#: FLR000070565
NAICS #: 562920 – Materials Recovery Facilities

3) Responsible Officials

Buff Fritz
Branch Manager
buff.fritz@lightingresourcesinc.com

4) Inspection Participants

Buff Fritz, Lighting Resources
Nick Nastav, Lighting Resources

Michael Eckoff, FDEP
Mark Anthony Relon, USEPA
Parvez Mallick, USEPA

5) Date of Inspection

August 8, 2023 10:22 a.m.

6) Applicable Regulations[1]

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 et seq., and rules 62.710.210 - .901, and 62-730 et seq. of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.); and Hazardous Waste Permit 309339-004-H0.

Pursuant to Fla. Admin. Code Ann. r. 62-730.020(1) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to [Fla. Admin. Code Ann. r. 62-730.185(1)] [40 C.F.R. § 273.9], a Large Quantity Handler of Universal Waste (LQHUW) is a universal waste handler who accumulates 5,000

1 As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

kilograms or more total of universal waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15] (hereinafter referred to as the "SAA Permit Exemption").

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Lighting Resources (hereinafter, "LR" or "Facility") compliance with the conditions of its RCRA Hazardous Waste Facility Operating Permit [309339-004-HO], the applicable requirements of RCRA and the corresponding Florida regulations. This was an EPA lead inspection.

8) Facility Description

The facility most recently notified FDEP on February 10, 2023, as a large quantity generator of hazardous waste, an operating commercial treatment, storage, and disposal facility, a large quantity handler of universal waste, a destination facility for universal waste, a transporter of universal waste, a mercury recovery and/or reclamation facility, and a transporter of hazardous waste. The facility originally received EPA ID FLR000070565 on February 17, 2011. The facility began lamp processing operations at this location on July 11, 2012. The RCRA permit [309339-004-HO] was issued on August 2, 2022, to operate a mercury containing lamp and device storage and recovery facility. The permit expires on July 6, 2027. LR employs 27 people with operating hours from 6 a.m. to 2:30 p.m. and 2:30 p.m. to 11 p.m., Monday to Friday. LR is connected to the municipal wastewater collection and potable water systems.

LR is permitted to operate a mercury containing lamp and device storage and recovery facility. The storage of mercury containing lamps are limited to 139,104 T-12 lamps. Total storage of processed glass is limited to a maximum volume of four 20-yard roll-off containers, or 120,000 pounds (lbs.). Total storage of processed metals is limited to a maximum of 12,000 lbs. or sixty 55-gallon drums. Maximum storage capacity of phosphor powder is limited to 24,000 lbs. or thirty-two 55-gallon drums. Universal waste coming into the facility is off-loaded at one of two loading docks and placed inside the warehouse where the number of containers described on the shipping papers are counted to verify the number of containers delivered by the trucking company. Once verified, intact lamps are moved to rows 1 through 9 in the warehouse, crushed lamps are moved to Row 10, and other materials are placed in open rows 1 through 9, as space is available. Weighed electronics for recycling are stored on the loading dock. A written log is maintained identifying the shipping paper number, the generator of the waste, the date the waste arrived onsite, and the date the waste was verified. Universal waste batteries are stored along the

north wall of the warehouse. Located in a separate room with an air filtering system and a self-contained, negative pressure process, is a Balcan MP8000 lamp processor (Balcan). The Balcan separates the glass, end caps and phosphor powder from mercury containing lamps. The equipment can operate all day during each business day. Lamps are fed into the processor on a conveyor belt and pass through crushers. Phosphor powder is continuously pulled out of the system by air handlers. Glass and metal end caps are separated and fall out into separate containers. Lamps are processed by type with one machine handling long tubes and a second, multipurpose machine, handling crushed lamps, HID lamps, and CFLs.

9) Previous Inspection History

Florida Department of Environmental Protection (FDEP) has conducted one RCRA CEI at the subject facility between 2020 and 2023 and found no violations during those inspections.

On January 28, 2021, FDEP conducted the most recent RCRA CEI at the subject facility and found no apparent violations of RCRA's requirements.

10) Opening Conference

On August 8, 2023, EPA inspectors Mark Anthony Relon and Parvez Mallick, accompanied by FDEP inspector Michael Eckoff, arrived at Lighting Resources at approximately 10:22 a.m. Buff Fritz, Branch Manager, immediately received the inspectors. Buff Fritz, and the inspectors were joined by Nick Nastav, for the opening conference. The inspectors introduced themselves, showed their credentials to Buff Fritz and Nick Nastav, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

Buff Fritz provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Facility representative led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Main Warehouse

The Main Warehouse is the primary storage area permitted to store intact mercury containing lamps, crushed or broken mercury containing lamps, mercury containing devices, large and small type batteries, PCB lamp ballasts, non-PCB lamp ballasts, separated glass, separated metals, and phosphor powder. Within the Main Warehouse, rows are designated by specific categorical

waste or process material. Rows 1 through 9 store electronic waste, whole lamp products, and universal waste. Row 10 stores crushed or broken mercury containing lamps.

Row 10

LR manages a permitted storage section in Row 10 for managing universal waste crushed lamps that is generated from line processing in the Balcan Room. The inspectors observed thirty-four (34) 55-gallon containers in this row. The containers were located in Row 10, all equipped with drum cover lids, and all closed (Figures 1 and 2). The containers were labeled crushed fluorescent lamps.

Nine (9) of the thirty-four (34) containers were rejected waste due to the contents being wet (Figure 3 and 4). Facility personnel stated it is being sent back to the respective customer client(s) for reevaluation before accepting the material again.

Row 9

LR manages a permitted storage section in Row 9 for managing universal waste mercury devices from generators' waste sent to the facility. The inspectors observed forty-three (43) 55-gallon containers in this row. The containers were located in Row 9, all equipped with drum cover lids, and all closed.

Inspectors observed one 55-gallon container of non-PCB magnetic ballasts and one 55-gallon container of batteries in this area. The oldest storage date of any container within this area is January 5, 2023.

Row 8

LR manages a permitted storage section in Row 8 for managing universal waste electronic waste (e-waste) from generators' waste sent to the facility. The inspectors observed thirteen (13) Gaylord box containers in this row. The containers were located in Row 8 and all containers were closed.

Inspectors also observed four (4) 4-foot boxes of scrap steel from light fixtures. The containers were located in Row 8 and all containers were closed. The oldest storage date of any container within this area is August 1, 2023.

Row 7

LR manages a permitted storage section in Row 7 for managing universal waste batteries from generators' waste sent to the facility. The inspectors observed thirty-two (32) 55-gallon containers in this row. The containers were located in Row 7, all equipped with drum cover lids, and all closed. The containers were labeled "batteries alkaline," "batteries charged for mixed," etc. The oldest storage date of any container within this area is January 23, 2023.

Row 6

LR manages a permitted storage section in Row 6 for managing lead acid batteries, non-PCB magnetic ballasts, and e-waste from generators' waste sent to the facility. The inspectors

observed a total of thirty-one (31) 30-gallon and 55-gallon containers in this row. The containers were located in Row 6, all equipped with drum cover lids, and all closed.

Inspectors observed one 55-gallon container of airbags (Figure 5). The date of the container was May 11, 2022. Inspectors asked facility personnel the reason for the exceeded storage time of one year in the permitted storage area. On September 13, 2023, facility personnel provided information via email claiming the airbags were not a waste and will be reclaimed at another facility once shipped. RCRA Online document 14920 states that "airbag inflators that are not used because they fail a quality control program are off-specification commercial chemical products and are exempt from RCRA regulation when legitimately reclaimed."

Row 5

LR manages a permitted storage section in Row 5 for managing materials that need further processing such as is universal waste batteries undergoing consolidation for off-site shipment. The inspectors observed twenty-four (24) 55-gallon containers in this row. The containers were located in Row 5, all equipped with drum cover lids, and all closed. The oldest storage date of any container within this area is July 10, 2023.

Row 4

LR manages a permitted storage section in Row 4 for managing lead acid batteries, e-waste, and mixed universal waste lamps. The inspectors observed one pallet of mixed universal waste lamps and four (4) 30-gallon containers of lead acid batteries and e-waste in this row. The containers were located in Row 4, all equipped with drum cover lids, and all closed. The oldest storage date of any container within this area is June 14, 2023.

Rows 2 and 3

No containers were observed in these areas at the time of the facility walkthrough. However, at the end of the inspection, facility personnel notified inspectors that the facility had stored fluorescent lamps with shatter shields from one tractor trailer outside Warehouse C (Figures 24 through 26). See section titled "Outside Warehouse C" for more details.

Row 1

LR manages a permitted storage section in Row 1 for managing universal waste lamps and e-waste from generators' waste sent to the facility. The inspectors observed four (4) Gaylord box containers and 2 pallets of universal waste lamps and e-waste in this row. The containers were located in Row 1 and all closed. The oldest storage date of any container within this area is July 24, 2023.

Inspectors observed 2 pallets of used batteries with no distinctive labels to distinguish a storage start date or a customer/generator label (Figures 6 and 7). In the facility permit application, the time limitations for storing batteries on-site are less than one year.

Pursuant to HW Permit 309339-004-HO, Part I – General and Standard Conditions, this permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits.

Battery Storage Area

LR manages a Battery Storage Area in the middle of the warehouse as a workflow area for processing and sorting of materials such as batteries and other universal waste unloaded from trucks.

Stored along the north wall of the warehouse were containers of sorted waste streams. The following containers were in the area:

- Nine (9) containers of mercury containing devices;
- Four (4) containers of alkaline batteries;
- Fifteen (15) containers of lithium metal batteries; and
- One partial pallet of lead acid batteries.

All the containers were closed and properly labeled and marked.

LR manages a SAA adjacent to the Battery Sorting Area for managing hazardous waste floor sweepings that is generated by waste residue accumulated on the floor after cleaning and sweeping. The inspectors observed one 55-gallon container in this SAA. The drum was located along the east wall near the bay doors, and it was equipped with a drum cover lid, which was closed. The drum was labeled D009 hazardous waste mercury contaminated debris, and not identified with an indication of the hazards of the contents (Figure 8).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazards of the contents.

Shatter Shield Area

LR manages unprocessed shatter shield lamps in the Shatter Shield Area from generators' waste sent to the facility. Inspectors observed four (4) Gaylord box containers of unprocessed shatter shield lamps (Figures 11 and 12). Inspectors asked facility personnel if they store the lamps temporarily outside the permitted storage area for processing. Facility personnel stated they leave the remaining unprocessed shatter shield lamps outside under the overhead roof, and the processed lamps are stored in the permitted storage area for further processing. Inspectors recommended facility personnel to move any unfinished shatter shield lamps inside the permitted storage area at the end of each business day.

Inspectors also observed several containers and boxes of toner, wire, non-PCB capacitors, ballasts, scrap metal, and e-waste in this area (Figures 9 and 10).

Pursuant to HW Permit 309339-004-HO, Part II Subpart B – Specific Operating Conditions, the Permittee shall not exceed the limits identified in Table 3-3 of the permit application and incorporated as Attachment B of this permit.

Balcan Room (Processing Room)

LR manages a SAA in the Balcan Room for managing hazardous waste phosphor powder that is generated by processed fluorescent lamps. The inspectors observed two (2) 55-gallon containers in this SAA. The containers were located under two (2) phosphor powder collection points for accumulating the phosphor powder, and they were equipped with a drum cover lid, which were closed. The first container was closed, dated, labeled D009 hazardous waste solid (mercury), and identified with an indication of the hazards of the contents (Figure 13 and 14). The second container observed was closed, dated, properly labeled, and identified with an indication of the hazards of the contents (Figure 15).

LR manages a hazardous waste Central Accumulation Area (CAA) in the Balcan Room. The CAA was adjacent to the end of the fluorescent lamp processing cycle. The area was identified with a sign which read "danger, hazardous waste storage."

The CAA is equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; it is equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; it is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and it is equipped with water to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system.

The CAA contained the following wastes:

- Seven (7) 55-gallon drums of hazardous waste floor sweepings. The oldest accumulation start date was 4/5/2023;
- One 55-gallon drum of hazardous waste debris-A/C filters, spent PPE-gloves, masks, rags. The accumulation start date was 7/28/2023; and
- Eleven (11) 55-gallon drums of hazardous waste phosphor powder. The oldest accumulation start date was 7/13/2023 (Figures 16 through 19).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(b)], an LQG who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of Fla. Admin. Code Ann. r. 62-730.180 [40 C.F.R. Parts 124, 264 through 268 and Part 270].

Warehouse C Area

Inspectors observed glass cutlet accumulating in two (2) 20-yard roll-off containers; one was full and one was partially full (Figure 20). Sampling of glass cutlet to meet permit requirements is conducted in either the roll-off container or the tipper where the glass cutlet exits the Balcan in the Balcan Room. Inspectors asked facility personnel where exactly sampling takes place. On September 13, 2023, facility personnel stated in an email that sampling was taken at the end of two (2) process outlets from the Balcan Room.

Supplies are also stored in this warehouse. Inspectors also observed containers of bulb ends, LED ballasts, X-ray film, and incandescent lamps. One Gaylord box container of fluorescent lamps with shatter shields was in this area (Figures 21 and 22).

Pursuant to HW Permit 309339-004-HO, Part II Subpart B – Specific Operating Conditions, the Permittee shall not exceed the limits identified in Table 3-3 of the permit application and incorporated as Attachment B of this permit.

Outside Warehouse C

Outside Warehouse C included three (3) tractor-trailers parked on the northeast side of the building. One of the three tractor-trailers stored fluorescent lamps with shatter shields (Figure 23). Inspectors asked facility personnel if these lamps were allowed to be stored outside the permitted area. Facility personnel stated that they were temporarily staged in the tractor-trailers before being stored within the permitted storage area.

Pursuant to HW Permit 309339-004-HO, Part II Subpart B – Specific Operating Conditions, the Permittee shall not exceed the limits identified in Table 3-3 of the permit application and incorporated as Attachment B of this permit.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's Contingency Plan.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Buff Fritz is listed as the primary emergency coordinator, and the other individuals are not listed in the order in which they will assume responsibility as alternates.

Pursuant to [Fla. Admin. Code Ann. r. 62-730.160(1)] [40 C.F.R. § 262.17(a)(6)], which incorporates [Fla. Admin. Code Ann. r. 62-730.160(1)] [40 C.F.R. § 262.261(d)], and is a condition of the LQG Permit Exemption, the contingency plan must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator, and this list must be kept up to date.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities.

The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

A copy of the Contingency Plan (and its quick reference guide) was most recently submitted to the police department, fire department, hospital, State and local emergency response teams on September 13, 2023 after the local authorities have been notified of the modification and have received hard copies of the updated emergency contacts in the contingency plan.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates [Fla. Admin. Code Ann. r. 62-730.160(1)] [40 C.F.R. § 262.256], and is a condition of the LQG Permit Exemption, a generator must: (a) attempt to make arrangements with the local authorities identified, as appropriate for the type of waste handled at the Facility and the potential need for the services of these authorities, and (b) maintain records documenting the arrangements made.

The quick reference guide includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for Operations Manager, Branch Manager, etc. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

LR provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training completed since calendar year 2020.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since calendar year 2020. Hazardous waste manifest records show that universal waste lamps, non-RCRA regulated material (non-PCB ballasts for recycling), D009 hazardous waste mercury are routinely shipped to Lighting Resources (TXD008029191), Lighting Resources LLC (IN0000351387), and 1522 Lighting Resources (AZD983476680) and the most recent shipment was made on July 28, 2023.

Weekly Inspection Records:

The inspectors reviewed LR's available records of inspections of the hazardous waste central accumulation area (CAA) since calendar year 2020. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations about aisle space, legible container labels, closed lids and bungs, condition of containers, container

stacking, container storage time, housekeeping, emergency communication, etc. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Employees do routinely record inspection observations and subsequent follow-up actions on the inspection log.

13) Closing Conference

The inspectors conducted the exit meeting at 4:48 p.m. with Buff Fritz and Nick Nastav. During this meeting, the inspectors stated their preliminary conclusions of the inspection. LR agreed to provide a follow up answer for the airbag container, contingency plan updates for the alternate coordinator, arrangements to local authorities, annual reviews of the contingency plan, and sampling locations for the separated glass and metal. On September 13, 2023, Steven Barnett provided all records requested in an email to Mark Anthony Relon, Parvez Mallick, and Michael Eckoff.

14) List of Attachments

Attachment 1 – Photo Log:

15) Signed

Mark Anthony Relon
Environmental Engineer

Parvez Mallick
Environmental Engineer

16) Concurrence

Araceli B. Chavez
RCRA Enforcement Section

Attachment 1 – Photo Log

26 Photos taken on: August 8, 2023
Photos taken by: Mark Anthony Relon
Photos taken with: Kodak PixPro Digital Camera
EPA Property Tag: SX9088

Attachment 1- Lighting Resources LLC
RCRA CEI Photographs

Figure 1: 11:25 AM Row 10
Thirty-four (34) 55-gallon containers observed.

Figure 2: 11:25 AM Row 10
Thirty-four (34) 55-gallon containers observed.

Figure 3: 11:25 AM Row 10
Nine (9) of the thirty-four (34) containers in Row 10 were wet crush rejected waste.

Figure 4: 11:30 AM Row 10
Nine (9) of the thirty-four (34) containers in Row 10 were wet crush rejected waste.

	
Figure 5: 11:59 AM Row 6 One 55-gallon container of airbags observed.	Figure 6: 12:05 PM Row 1 One of two (2) pallets of used batteries observed.

	
Figure 7: 12:05 PM WMF: Row 1 Two of two (2) pallets of used batteries observed.	Figure 8: 12:33 PM Battery Storage Area One 55-gallon SAA container of floor sweepings observed with no indication of the hazards of the contents.

Figure 9: 12:41 PM Shatter Shield Area
One Gaylord box container of toner observed.

Figure 10: 12:41 PM Shatter Shield Area
One Gaylord box container of wire and e-waste observed.

Figure 11: 12:41 PM Shatter Shield Area
One of four (4) Gaylord box containers of unprocessed shatter shield lamps observed.

Figure 12: 12:42 PM Shatter Shield Area
One of four (4) Gaylord box containers of unprocessed shatter shield lamps observed.

Figure 13: 12:47 PM Balcan Room
One 55-gallon SAA container of phosphor powder observed.

Figure 14: 12:47 PM Balcan Room
One 55-gallon SAA container of phosphor powder observed with hazardous waste label and indication of the hazards of the contents.

Figure 15: 12:51 PM Balcan Room
One 55-gallon SAA container of phosphor powder observed.

Figure 16: 12:57 PM Balcan Room CAA
One of eleven (11) 55-gal containers of phosphor powder observed.

Figure 17: 12:57 PM Balcan Room CAA
One of eleven (11) 55-gal containers of phosphor powder observed.

Figure 18: 12:58 PM Balcan Room CAA
Two (2) of eleven (11) 55-gal containers of phosphor powder observed.

Figure 19: 12:58 PM Balcan Room CAA
One of eleven (11) 55-gal containers of phosphor powder observed.

Figure 20: 1:01 PM Warehouse C Area
Two (2) 20-yard roll-off containers observed. One was full and one was partially full.

Figure 21: 1:05 PM Warehouse C Area
One Gaylord box container of fluorescent lamps with shatter shields observed.

Figure 22: 1:05 PM Warehouse C Area
One Gaylord box container of fluorescent lamps with shatter shields observed.

Figure 23: 1:09 PM Outside Warehouse C Area
Observed is one of the three (3) tractor-trailers storing fluorescent lamps with shatter shields.

Figure 24: 5:07 PM Rows 2 and 3
Stored fluorescent lamps with shatter shields from one tractor trailer outside Warehouse C.

Figure 25: 5:08 PM Rows 2 and 3
Stored fluorescent lamps with shatter shields from one tractor trailer outside Warehouse C.

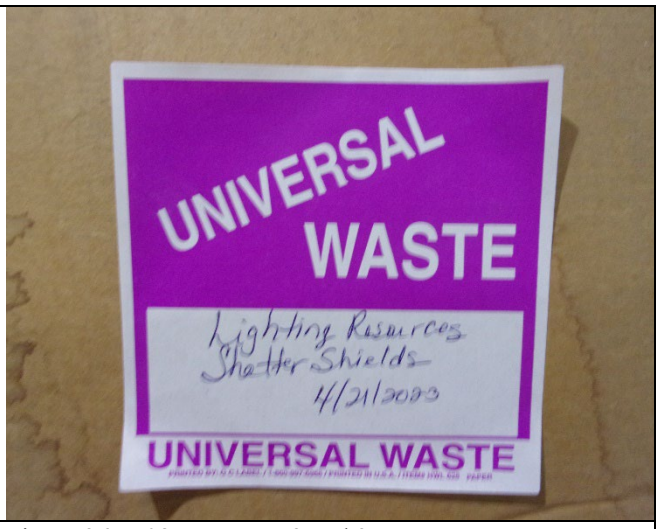

Figure 26: 5:08 PM Rows 2 and 3
Container label for one Gaylord box from tractor trailer outside Warehouse C.