Eckoff, Michael

From: Steve Barnett <steve.barnett@lightingresourcesinc.com>
Sent: Friday, November 3, 2023 5:23 PM
To: Eckoff, Michael
Cc: Kevin McMullen
Subject: FW: Response to Oct. 25 Letter
Attachments: Response Letter 11-3-2023 Michael Eckoff.docx; Attachments Docs.zip; Training Procedures 9-13-23 Revised .docx

Michael , Kevin

I am resending the below email to you in 2 separate emails. All of the attachments made it too big to send. The 2nd email will have the other attachment with pictures.

Thank You

Steve Barnett
Vice President
Compliance & Materials Management
EZ on the Earth
A Lighting Resources Company
2212 Buffalo Rd. Ste. 210
Johnson City, TN 37604
Office: 423-328-7012
Cell: 423-534-6717
Steve.barnett@lightingresourcesinc.com
Web: www.lightingresourcesinc.com

EZ ON THE EARTH
NATIONWIDE RECYCLER OF BULBS BALLASTS, BATTERIES & MORE

From: Steve Barnett
Sent: Friday, November 3, 2023 4:58 PM
To: Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>
Cc: Buff Fritz <buff.fritz@lightingresourcesinc.com>; Nick Nastav <nick.nastav@lightingresourcesinc.com>; Kevin McMullen <Kevin@recycletechnologies.com>; Jon Barnett <jon.barnett@lightingresourcesinc.com>
Subject: Response to Oct. 25 Letter

Hello Michael,

Please see the attached response with corrective actions to your letter Dated Oct 25th, 2023 in regards to the Inspection August 8, 2023 of our Ocala, FL facility.

I hope you find these responses and corrective actions satisfactory.

Please reach out to be directly if you need additional information or have questions.

Thank You,
Steve

Steve Barnett
Vice President
Compliance & Materials Management
EZ on the Earth
A Lighting Resources Company
2212 Buffalo Rd. Ste. 210
Johnson City, TN 37604
Office: 423-328-7012
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Web: www.lightingresourcesinc.com

Michael Eckoff
Florida Dept. of Environmental Protection (FLDEP)
Central District Office
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803

November 3, 2023

RE: On-Site Inspection Date: 08/08/2023

Dear Mr. Eckoff,

Please find the below responses along with documentation to address the violations and corrective actions in your letter dated October 25, 2023.

Violation: 262.15(a)(5)(ii)

A generator must mark or label its containers with the following: (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Specifically, Lighting Resources, LLC failed to mark one container with an indication of the hazards of the contents.
Please provide documentation of the container properly marked to the Department within 30 days from the date of your receipt of this report.

Corrective Action Taken:
All containers are properly labeled listing the contents and hazards in each drum/container (See attached pictures)

Violation: Rule: 262.17(b)

A large quantity generator who accumulates hazardous waste for more than 90 days is subject to the requirements of 40 CFR parts 124, 264 through 268, and part 270 of this chapter, and the notification requirements of Section 3010 of RCRA...

Specifically, Lighting Resources, LLC stored one container of hazardous waste for greater than 90 days without a permit.

Please provide documentation of operational changes to ensure hazardous waste does not accumulate onsite for greater than 90 days and documentation of removal of the subject container from the property for proper disposal to the Department within 30 days from the date of your receipt of this report.

Corrective Action Taken:
Lighting Resources (LRL) has made an operational change to ensure the hazardous waste containers in our Central Accumulation Area (CAA) does not accumulate over 90 days. LRL has implemented a weekly inspection report of all containers in the CAA. These weekly reports will be kept on file for review anytime. All hazardous waste containers in the CAA are within the 90-day storage limits. (See the attached report.)

The subject container has been removed and scheduled for shipment to our downstream for processing. Please Note: Analytical reports show that the floor sweep that was contained in this subject container and other container are actually Non-Hazardous.
(See attached Shipping Document) (See Attached Analytical Report)

Violation Rule: 264.54(d)

The contingency plan must be reviewed, and immediately amended, if necessary, whenever: (d) The list of emergency coordinators changes.

Specifically, Lighting Resources, LLC failed to amend the contingency plan when the list of emergency coordinators changed.

Corrective Action: Lighting Resources, LLC is required to review, and immediately amend, if necessary, the contingency plan whenever the list of emergency coordinators changes.

Corrective Action Taken:
On September 13, 2023, facility personnel stated in an email that the contingency plan has been modified, adding Susan Phillips as the third contact on the Emergency notifications. Local authorities have been notified of the modification and have received hard copies of the updated emergency contacts in the contingency plan. (See Attached Modified Contingency Plan and Training Review Attendance log)

Violation Rule: 403.727(1)(c)

It is unlawful for any hazardous waste generator, transporter, or facility owner or operator to: (c) Fail to comply with a permit.

Specifically, Lighting Resources, LLC failed to label each container with the name of the customer or generator (permit application section 3.10 dated January 2022), failed to mark two pallets of batteries with the date received (permit application section 3.10 dated January 2022), processes shatter shield lamps in the covered loading dock instead of inside the building (permit application section 3.0 dated January 2022), stored one Gaylord box of fluorescent lamps in Warehouse C (permit application sections 3.7, 3.10, and 3.12 dated January 2022), stored pallets of fluorescent lamps in a trailer outside the building (permit application sections 3.7, 3.10, and 3.12 dated January 2022), and failed to document the annual review of the contingency plan (permit condition Part II Subpart A number 12.e.).

Corrective Action: Lighting Resources, LLC is required to comply with its permit.

Please provide documentation that all containers are labeled with the name of the customer or generator, that two pallets of batteries are marked with the date received, that all processing of fluorescent lamps is conducted inside the building, and that an annual review of the contingency plan will be conducted and documented to the Department within 30 days from the date of your receipt of this report.

Corrective Action Taken:
On September 13, 2023, facility personnel stated in an email that the cubic yard box of shatter shield lamps were temporarily staged in warehouse C awaiting the removal of the plastic coating for processing. No lamps are permanently stored in warehouse C. The lamps on the trailer were waiting for floor space to be unloaded into the warehouse. No lamps are permanently stored on trailers. These lamps were unloaded and placed in the warehouse during the inspection.

All lamps are processed inside of the facility within the designated lamp processing room. All containers are labeled with Waste name, generator name and accumulations dates of receiving at LRL.

Annual training is conducted in all LRL locations per the attached Training policy and annual review calendar. Hazcom/ Emergency Action/Contingency Plan is conducted in January company wide.

(Please see attached Sample Waste Labels and Training Schedule)

I hope you find the above responses, corrections, and attachments satisfactory. Please feel free to contact me if you need any other information.

Note: Attachments Contained in Zip Folder

Sincerely,
Steve Barnett
Vice President
Compliance & Material Management
Lighting Resources LLC
2212 Buffalo Rd.
Johnson City, TN 37604
Direct Phone: 423-534-6717
Email: steve.barnett@lightingresourcesinc.com

CC: Buff Fritz
Nick Nastav
Kevin McMullen
Jon Barnett

eurofins | Environment Testing

ANALYTICAL REPORT

PREPARED FOR

Attn: Buff Fritz
Lighting Resources LLC
1007 SW 16th Lane
Ocala, Florida 34471

Generated 5/23/2023 8:16:42 PM

JOB DESCRIPTION

Total and TCLP Hg

JOB NUMBER

670-19778-1

Eurofins Orlando
481 Newburyport Avenue
Altamonte Springs FL 32701

See page two for job notes and contact information.

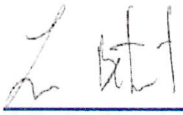
Eurofins Orlando

Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing Southeast, LLC Project Manager.

Authorization



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Authorized for release by
Luis Betancourt, Project Manager I
Luis.Betancourt@et.eurofinsus.com
(407)339-5984

Table of Contents

Definitions/Glossary

Client: Lighting Resources LLC
Project/Site: Total and TCLP Hg

Job ID: 670-19778-1

Qualifiers

Metals

Qualifier	Qualifier Description
J3	Estimated value; value may not be accurate. Spike recovery or RPD outside of criteria.
U	Indicates that the compound was analyzed for but not detected.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
¤	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Case Narrative

Client: Lighting Resources LLC
Project/Site: Total and TCLP Hg

Job ID: 670-19778-1

Job ID: 670-19778-1

Laboratory: Eurofins Orlando

Narrative

Job Narrative
670-19778-1

Comments
No additional comments.

Receipt
The samples were received on 5/17/2023 8:00 AM. Unless otherwise noted below, the samples arrived in good condition, and where required, properly preserved and on ice. The temperature of the cooler at receipt was 5.4° C.

Metals
No analytical or quality issues were noted, other than those described in the Definitions/Glossary page.

Organic Prep
No analytical or quality issues were noted, other than those described in the Definitions/Glossary page.

Client Sample ID: 1-Glove

Lab Sample ID: 670-19778-1
Date Collected: 05/16/23 13:00
Matrix: Solid
Date Received: 05/17/23 08:00

Method: SW846 7470A - Mercury (CVAA) - TCLP

Analyte	Result	Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	0.0020	U	0.0040	0.0020	mg/L		05/20/23 10:28	05/20/23 13:04	1

Method: SW846 7471B - Mercury (CVAA)

Analyte	Result	Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	**3.9**		0.41	0.21	mg/Kg		05/19/23 13:36	05/20/23 11:02	10

Client Sample ID: 1-Mercury Vapor PPE Cartridge

Lab Sample ID: 670-19778-2
Date Collected: 05/16/23 13:10
Matrix: Solid
Date Received: 05/17/23 08:00

Method: SW846 7470A - Mercury (CVAA) - TCLP

Analyte	Result	Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	0.0020	U	0.0040	0.0020	mg/L		05/20/23 10:28	05/20/23 13:05	1

Method: SW846 7471B - Mercury (CVAA)

Analyte	Result	Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	**0.40**		0.40	0.20	mg/Kg		05/19/23 13:36	05/20/23 11:03	10

Client Sample ID: 1-AC/ Filter

Lab Sample ID: 670-19778-3
Date Collected: 05/16/23 13:20
Matrix: Solid
Date Received: 05/17/23 08:00

Method: SW846 7470A - Mercury (CVAA) - TCLP

Analyte	Result	Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	**0.031**		0.0040	0.0020	mg/L		05/20/23 10:28	05/20/23 13:07	1

Method: SW846 7471B - Mercury (CVAA)

Analyte	Result	Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	**7.6**		0.39	0.19	mg/Kg		05/19/23 13:36	05/20/23 11:04	10

Client Sample ID: 1- Floor Sweep

Lab Sample ID: 670-19778-4
Date Collected: 05/16/23 13:31
Matrix: Solid
Date Received: 05/17/23 08:00

Method: SW846 7470A - Mercury (CVAA) - TCLP

Analyte	Result	Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	**0.049**		0.016	0.0080	mg/L		05/20/23 10:28	05/20/23 13:13	4

Method: SW846 7471B - Mercury (CVAA)

Analyte	Result	Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	**140**		7.7	3.8	mg/Kg		05/19/23 13:36	05/20/23 11:25	200

Detection Summary

Client: Lighting Resources LLC
Project/Site: Total and TCLP Hg

Job ID: 670-19778-1

Client Sample ID: 1-Glove — Lab Sample ID: 670-19778-1

Analyte	Result	Qualifier	PQL	MDL	Unit	Dil Fac	D	Method	Prep Type
Mercury	3.9		0.41	0.21	mg/Kg	10		7471B	Total/NA

Client Sample ID: 1-Mercury Vapor PPE Cartridge — Lab Sample ID: 670-19778-2

Analyte	Result	Qualifier	PQL	MDL	Unit	Dil Fac	D	Method	Prep Type
Mercury	0.40		0.40	0.20	mg/Kg	10		7471B	Total/NA

Client Sample ID: 1-AC/ Filter — Lab Sample ID: 670-19778-3

Analyte	Result	Qualifier	PQL	MDL	Unit	Dil Fac	D	Method	Prep Type
Mercury	0.031		0.0040	0.0020	mg/L	1		7470A	TCLP
Mercury	7.6		0.39	0.19	mg/Kg	10		7471B	Total/NA

Client Sample ID: 1- Floor Sweep — Lab Sample ID: 670-19778-4

Analyte	Result	Qualifier	PQL	MDL	Unit	Dil Fac	D	Method	Prep Type
Mercury	0.049		0.016	0.0080	mg/L	4		7470A	TCLP
Mercury	140		7.7	3.8	mg/Kg	200		7471B	Total/NA

This Detection Summary does not include radiochemical test results.

Method: 7470A - Mercury (CVAA)

Lab Sample ID: LCS 670-35705/10-A
Matrix: Solid
Analysis Batch: 35709

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 35705

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Mercury	0.00250	0.00262		mg/L		105	85 - 115

Lab Sample ID: LCSD 670-35705/11-A
Matrix: Solid
Analysis Batch: 35709

Client Sample ID: Lab Control Sample Dup
Prep Type: Total/NA
Prep Batch: 35705

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Mercury	0.00250	0.00257		mg/L		103	85 - 115	2	20

Lab Sample ID: LB 670-35553/1-B
Matrix: Solid
Analysis Batch: 35709

Client Sample ID: Method Blank
Prep Type: TCLP
Prep Batch: 35705

Analyte	LB Result	LB Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	0.0020	U	0.0040	0.0020	mg/L		05/20/23 10:28	05/20/23 12:55	1

Lab Sample ID: 670-19557-A-15-B MS
Matrix: Solid
Analysis Batch: 35709

Client Sample ID: Matrix Spike
Prep Type: TCLP
Prep Batch: 35705

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits
Mercury	0.0020	U J3	0.0250	0.0307	J3	mg/L		123	80 - 120

Lab Sample ID: 670-19557-A-15-C MSD
Matrix: Solid
Analysis Batch: 35709

Client Sample ID: Matrix Spike Duplicate
Prep Type: TCLP
Prep Batch: 35705

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Mercury	0.0020	U J3	0.0250	0.0303	J3	mg/L		121	80 - 120	1	20

Method: 7471B - Mercury (CVAA)

Lab Sample ID: MB 670-35625/12-A
Matrix: Solid
Analysis Batch: 35710

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 35625

Analyte	MB Result	MB Qualifier	PQL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	0.00025	U	0.00050	0.00025	mg/Kg		05/19/23 13:36	05/20/23 10:13	1

Lab Sample ID: LCS 670-35625/10-A
Matrix: Solid
Analysis Batch: 35710

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 35625

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Mercury	0.200	0.206		mg/Kg		103	75 - 125

Method: 7471B - Mercury (CVAA) (Continued)

Lab Sample ID: LCSD 670-35625/11-A
Matrix: Solid
Analysis Batch: 35710

Client Sample ID: Lab Control Sample Dup
Prep Type: Total/NA
Prep Batch: 35625

Analyte			Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Mercury			0.200	0.202		mg/Kg		101	75 - 125	2	20

Lab Sample ID: 660-129275-B-1-I MS
Matrix: Solid
Analysis Batch: 35710

Client Sample ID: Matrix Spike
Prep Type: Total/NA
Prep Batch: 35625

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits
Mercury	0.019	U	0.204	0.218		mg/Kg		107	80 - 120

Lab Sample ID: 660-129275-B-1-J MSD
Matrix: Solid
Analysis Batch: 35710

Client Sample ID: Matrix Spike Duplicate
Prep Type: Total/NA
Prep Batch: 35625

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Mercury	0.019	U	0.204	0.214		mg/Kg		105	80 - 120	2	20

Metals

Leach Batch: 35553

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
670-19778-1	1-Glove	TCLP	Solid	1311	
670-19778-2	1-Mercury Vapor PPE Cartridge	TCLP	Solid	1311	
670-19778-3	1-AC/ Filter	TCLP	Solid	1311	
670-19778-4	1- Floor Sweep	TCLP	Solid	1311	
LB 670-35553/1-B	Method Blank	TCLP	Solid	1311	
670-19557-A-15-B MS	Matrix Spike	TCLP	Solid	1311	
670-19557-A-15-C MSD	Matrix Spike Duplicate	TCLP	Solid	1311	

Prep Batch: 35625

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
670-19778-1	1-Glove	Total/NA	Solid	7471B	
670-19778-2	1-Mercury Vapor PPE Cartridge	Total/NA	Solid	7471B	
670-19778-3	1-AC/ Filter	Total/NA	Solid	7471B	
670-19778-4	1- Floor Sweep	Total/NA	Solid	7471B	
MB 670-35625/12-A	Method Blank	Total/NA	Solid	7471B	
LCS 670-35625/10-A	Lab Control Sample	Total/NA	Solid	7471B	
LCSD 670-35625/11-A	Lab Control Sample Dup	Total/NA	Solid	7471B	
660-129275-B-1-I MS	Matrix Spike	Total/NA	Solid	7471B	
660-129275-B-1-J MSD	Matrix Spike Duplicate	Total/NA	Solid	7471B	

Prep Batch: 35705

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
670-19778-1	1-Glove	TCLP	Solid	7470A	35553
670-19778-2	1-Mercury Vapor PPE Cartridge	TCLP	Solid	7470A	35553
670-19778-3	1-AC/ Filter	TCLP	Solid	7470A	35553
670-19778-4	1- Floor Sweep	TCLP	Solid	7470A	35553
LB 670-35553/1-B	Method Blank	TCLP	Solid	7470A	35553
LCS 670-35705/10-A	Lab Control Sample	Total/NA	Solid	7470A	
LCSD 670-35705/11-A	Lab Control Sample Dup	Total/NA	Solid	7470A	
670-19557-A-15-B MS	Matrix Spike	TCLP	Solid	7470A	35553
670-19557-A-15-C MSD	Matrix Spike Duplicate	TCLP	Solid	7470A	35553

Analysis Batch: 35709

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
670-19778-1	1-Glove	TCLP	Solid	7470A	35705
670-19778-2	1-Mercury Vapor PPE Cartridge	TCLP	Solid	7470A	35705
670-19778-3	1-AC/ Filter	TCLP	Solid	7470A	35705
670-19778-4	1- Floor Sweep	TCLP	Solid	7470A	35705
LB 670-35553/1-B	Method Blank	TCLP	Solid	7470A	35705
LCS 670-35705/10-A	Lab Control Sample	Total/NA	Solid	7470A	35705
LCSD 670-35705/11-A	Lab Control Sample Dup	Total/NA	Solid	7470A	35705
670-19557-A-15-B MS	Matrix Spike	TCLP	Solid	7470A	35705
670-19557-A-15-C MSD	Matrix Spike Duplicate	TCLP	Solid	7470A	35705

Analysis Batch: 35710

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
670-19778-1	1-Glove	Total/NA	Solid	7471B	35625
670-19778-2	1-Mercury Vapor PPE Cartridge	Total/NA	Solid	7471B	35625
670-19778-3	1-AC/ Filter	Total/NA	Solid	7471B	35625
670-19778-4	1- Floor Sweep	Total/NA	Solid	7471B	35625
MB 670-35625/12-A	Method Blank	Total/NA	Solid	7471B	35625

Metals (Continued)

Analysis Batch: 35710 (Continued)

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
LCS 670-35625/10-A	Lab Control Sample	Total/NA	Solid	7471B	35625
LCSD 670-35625/11-A	Lab Control Sample Dup	Total/NA	Solid	7471B	35625
660-129275-B-1-I MS	Matrix Spike	Total/NA	Solid	7471B	35625
660-129275-B-1-J MSD	Matrix Spike Duplicate	Total/NA	Solid	7471B	35625

Lab Chronicle

Client: Lighting Resources LLC
Project/Site: Total and TCLP Hg

Job ID: 670-19778-1

Client Sample ID: 1-Glove

Date Collected: 05/16/23 13:00
Date Received: 05/17/23 08:00

Lab Sample ID: 670-19778-1
Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
TCLP	Leach	1311			35553	ES	EET ORL	05/19/23 09:25
TCLP	Prep	7470A			35705	AS	EET ORL	05/20/23 10:28
TCLP	Analysis	7470A		1	35709	AS	EET ORL	05/20/23 13:04
Total/NA	Prep	7471B			35625	AS	EET ORL	05/19/23 13:36
Total/NA	Analysis	7471B		10	35710	AS	EET ORL	05/20/23 11:02

Client Sample ID: 1-Mercury Vapor PPE Cartridge

Date Collected: 05/16/23 13:10
Date Received: 05/17/23 08:00

Lab Sample ID: 670-19778-2
Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
TCLP	Leach	1311			35553	ES	EET ORL	05/19/23 09:25
TCLP	Prep	7470A			35705	AS	EET ORL	05/20/23 10:28
TCLP	Analysis	7470A		1	35709	AS	EET ORL	05/20/23 13:05
Total/NA	Prep	7471B			35625	AS	EET ORL	05/19/23 13:36
Total/NA	Analysis	7471B		10	35710	AS	EET ORL	05/20/23 11:03

Client Sample ID: 1-AC/ Filter

Date Collected: 05/16/23 13:20
Date Received: 05/17/23 08:00

Lab Sample ID: 670-19778-3
Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
TCLP	Leach	1311			35553	ES	EET ORL	05/19/23 09:25
TCLP	Prep	7470A			35705	AS	EET ORL	05/20/23 10:28
TCLP	Analysis	7470A		1	35709	AS	EET ORL	05/20/23 13:07
Total/NA	Prep	7471B			35625	AS	EET ORL	05/19/23 13:36
Total/NA	Analysis	7471B		10	35710	AS	EET ORL	05/20/23 11:04

Client Sample ID: 1- Floor Sweep

Date Collected: 05/16/23 13:31
Date Received: 05/17/23 08:00

Lab Sample ID: 670-19778-4
Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
TCLP	Leach	1311			35553	ES	EET ORL	05/19/23 09:25
TCLP	Prep	7470A			35705	AS	EET ORL	05/20/23 10:28
TCLP	Analysis	7470A		4	35709	AS	EET ORL	05/20/23 13:13
Total/NA	Prep	7471B			35625	AS	EET ORL	05/19/23 13:36
Total/NA	Analysis	7471B		200	35710	AS	EET ORL	05/20/23 11:25

Laboratory References:

EET ORL = Eurofins Orlando, 481 Newburyport Avenue, Altamonte Springs, FL 32701, TEL (407)339-5984

Accreditation/Certification Summary

Client: Lighting Resources LLC
Project/Site: Total and TCLP Hg

Job ID: 670-19778-1

Laboratory: Eurofins Orlando

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Alabama	State	42800	06-30-23
Florida	NELAP	E83018	06-30-24
Mississippi	State	MS00007	06-30-23
North Carolina (DW)	State	12712	07-31-23
Tennessee	State	TN04930	04-05-24
Texas	NELAP	T104704571	02-29-24

Method Summary

Client: Lighting Resources LLC
Project/Site: Total and TCLP Hg

Job ID: 670-19778-1

Method	Method Description	Protocol	Laboratory
7470A	Mercury (CVAA)	SW846	EET ORL
7471B	Mercury (CVAA)	SW846	EET ORL
1311	TCLP Extraction	SW846	EET ORL
7470A	Preparation, Mercury	SW846	EET ORL
7471B	Preparation, Mercury	SW846	EET ORL

Protocol References:

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

EET ORL = Eurofins Orlando, 481 Newburyport Avenue, Altamonte Springs, FL 32701, TEL (407)339-5984

Sample Summary

Client: Lighting Resources LLC
Project/Site: Total and TCLP Hg

Job ID: 670-19778-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
670-19778-1	1-Glove	Solid	05/16/23 13:00	05/17/23 08:00
670-19778-2	1-Mercury Vapor PPE Cartridge	Solid	05/16/23 13:10	05/17/23 08:00
670-19778-3	1-AC/ Filter	Solid	05/16/23 13:20	05/17/23 08:00
670-19778-4	1- Floor Sweep	Solid	05/16/23 13:31	05/17/23 08:00

6712 Benjamin Road Suite 100
Tampa, FL 33634
Phone (813) 885-7427 Fax (813) 885-7049

Chain of Custody Record

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

Client Information	Sampler: BUFF FRITZ	Lab PM: Gartner, Cathy	Carrier Tracking No(s):	COC No: 660-81618-20831.1
Client Contact: Buff Fritz	Phone: 352-509-3001	E-Mail: cathy.gartner@testamericainc.com		Page: Page 1 of 2
Company: Lighting Resources LLC				Job #:
Address: 1007 SW 16th Lane	Due Date Requested:			
City: Oscala	TAT Requested (days):			
State, Zip: FL, 34471				
Phone: 352-509-3017(Tel)	PO #: Purchase Order not required			
Email: buff.fritz@lightingresourcesinc.com	WO #:			
Project Name: Processed Glass/Metals - Hg	Project #: 66006094			
Site:	SSOW#:			

Analysis Requested

7471A - Mercury
TCPL MERCURY

Preservation Codes:

A - HCL	M - Hexane
B - NaOH	N - None
C - Zn Acetate	O - AsNaO2
D - Nitric Acid	P - Na2O4S
E - NaHSO4	Q - Na2SO3
F - MeOH	R - Na2S2O3
G - Amchlor	S - H2SO4
H - Ascorbic Acid	T - TSP Dodecahydrate
I - Ice	U - Acetone
J - DI Water	V - MCAA
K - EDTA	W - pH 4-5
L - EDA	Z - other (specify)

Other:

Sample Identification	Sample Date	Sample Time	Sample Type (C=comp, G=grab)	Matrix (W=water, S=solid, O=waste/oil, BT=Tissue, A=Air)	Special Instructions/Note:
1- GLOVE	5/16/23	1 pm		Solid	
1-MERCURY VAPOR PRE Cartridge	5/16/23	110 pm		Solid	
1- AC/Filter	5/16/23	120 pm		Solid	
1- FLOOR SWEEP	5/16/23	131 pm		Solid	
				Solid	
				Solid	
				Solid	
				Solid	
				Solid	
				Solid	
				Solid	

670-19778 Chain of Custody

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown ☐ Radiological

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)
☐ Return To Client ☐ Disposal By Lab ☐ Archive For _____ Months

Deliverable Requested: I, II, III, IV, Other (specify)

Special Instructions/QC Requirements:

Empty Kit Relinquished by:	Date:	Time:	Method of Shipment:				
Relinquished by: Buff Fritz	Date/Time: 5/16/23 1600	Company CRI	Received by: ML	Date/Time: 5/17/23 8:00	Company eurofins		
Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company		
Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company		

Custody Seals Intact: Δ Yes Δ No	Custody Seal No.:	Cooler Temperature(s) °C and Other Remarks: 5.9 / 5.4

Ver: 08/04/2016

596 5/23/2023

Login Sample Receipt Checklist

Client: Lighting Resources LLC

Job Number: 670-19778-1

Login Number: 19778
List Number: 1
Creator: Clerisier, Meline

List Source: Eurofins Orlando

Question	Answer	Comment
Radioactivity wasn't checked or is </= background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

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

Weekly Hazardous Waste CAA Inspection

Date: 11/1/23

Container Contents	Properly Labeled	Dm Condition	Accumulation Start Date	Date Shipped Off Site	Checked By
Powder	Yes	Good	10/13		Nick N.
Powder	Yes	Good	10/19		Nick N.
Powder	Yes	Good	10/4		Nick N.
Powder	Yes	Good	9/28		Nick N.
Powder	Yes	Good	10/11		Nick N.
Powder	Yes	Good	10/17		Nick N.
Powder	Yes	Good	10/10		Nick N.
Powder	Yes	Good	10/9		Nick N.
Powder	Yes	Good	9/29		Nick N.
Powder	Yes	Good	9/12		Nick N.
Powder	Yes	Good	9/19		Nick N.
Powder	Yes	Good	9/20		Nick N.
Powder	Yes	Good	10/26		Nick N.
Powder	Yes	Good	10/30		Nick N.
Powder	Yes	Good	10/24		Nick N.
Powder	Yes	Good	9/18		Nick N.
Powder	Yes	Good	9/27		Nick N.
Powder	Yes	Good	9/26		Nick N.
Powder	Yes	Good	9/13		Nick N.
PPE	Yes	Good	10/23		Nick N
Acc	Yes	Good	9/21		Nick N.
Acc	Yes	Good	9/14		Nick N.

4.0 EMERGENCY PROCEDURES AND HAZARDOUS WASTE CONTINGENCY PLAN

The purpose of this document is to describe the Emergency Procedures and Hazardous Waste Contingency Plan (Plan) for the Lighting Resources Facility and its operations pursuant to Title 40 CFR Part § 264, Subpart D, and Chapter 62-737 F.A.C. The provisions of this Plan are to be carried out immediately whenever there is a medical emergency, or a fire, explosion, or spill / release of hazardous waste or hazardous waste constituents (mercury and other) which could threaten human health and/or the environment (in accordance with Title 40 CFR § 264.51(b)). This Plan outlines specific responsibilities and procedures for the prompt and effective response to an emergency situation. This Plan is organized by the following sections:

- Emergency Responsibilities of Emergency Coordinators
- Emergency Contact Information
- Regulatory Agencies Contact Information
- Emergency Equipment
- Medical Emergency Procedures
- Fire and Explosion Emergency Procedures
- Mercury (or other Hazardous) Spill / Release Emergency Procedures

This Emergency Procedures and Hazardous Waste Contingency Plan is designed to meet the applicable requirements of Title 40 CFR § 264, Subpart D, and Chapter 62-737 F.A.C.

4.1 Emergency Responsibilities of Emergency Coordinators

The Facility Manager serves as the primary Emergency Coordinator, and the Operations Manager, Logistics Coordinator, or Office Administrator will serve as the alternate Emergency Coordinator in the absence of the Facility Manager. Both the primary and alternate Emergency Coordinators have been appropriately trained to respond to emergencies that could potentially occur throughout the Facility. In the unlikely event of an emergency, the designated Emergency Coordinator is responsible for implementing the response actions outlined within this Plan.

4.2 Emergency Contact Information

An emergency contact list containing the names and contact phone numbers listed below, is posted in the Administrative Offices, and within Areas A, B, and C of the Facility. The emergency contact list is clearly posted in each designated area on a wall that is unobstructed from view and access.

LRI Florida Emergency Contact List and Contingency Plan

4.2 Emergency Contact Information

Emergency Coordinators:

Name:	Buff Fritz
Office Phone:	(352)-509-3001
Cell Phone:	(352)-342-6051
Home Phone:	(352)-390-6803

Alternate Emergency Coordinator #1:

Name:	Nick Nastav
Office Phone:	(352)-509-3001
Cell Phone:	(352)-816-0558

Alternate Emergency Coordinator #2:

Name:	Susan Phillips
Office Phone:	(352)-509-3001
Cell Phone:	(352)-553-7680

§ Emergency Contacts:

Ocala Police Department:		911
(Non-emergency):	(352) 369-7134	
Lt. Casey Eades	(352)-789-5539	
Ocala Fire Department:		911
(Non-emergency):	(352) 629-8503	
Local Ambulance Service:		911
HCA Ocala Hospital:	(352) 401-1137	
Florida DEP Central Distric	(407) 897-4100	
U.S. EPA Region 4:	(404) 562-8700	
Marion County Emergenc	(352) 351-8077	
State Warning Point	(800) 320-0519	

4.3 Regulatory Agencies Contact Information

Local	Marion County Emergency Management
Address	692 NW 30th Ave., Ocala, FL 34475
Phone	(352) 351-8077
State	Florida DEP - Central District
Address	3319 Maguire Blvd., Ste. 232, Orlando, FL 32803
Phone	(407) 897-4100
Federal	U.S. EPA Region 4
	Hazardous Waste Management Division
Address	61 Forsyth St. SW, Atlanta, GA 30303
Phone	(800) 241-1754
	National Response Center
	(800) 424-8802

sent via mail and email

4.4 Emergency Equipment

Lighting Resources shall maintain the following emergency equipment on-site and in working condition:

- Fire Extinguishers. Portable fire extinguishers are maintained in the Facility building (see **Drawing No. D7** for locations) to extinguish a fire.
- Mercury Spill Kit. Commercial spill kits (2) are maintained in the Facility building (see **Drawing No. D7** for locations) to respond to a mercury spill if one should occur. The spill kit will include but not be limited to: absorbent powder (e.g., MerconSORB™, Hg Absorb®, etc.), chemical sponges, pump/aspirator, a cleaning/decontaminating solution (to safely suppress Mercury vapor), Nitrile gloves, safety glasses, wipes, rinse bottle, recovery bags. Directions on how to use the equipment is located in the cover of the box.
- Hazardous Material Release / Spill (*other than Mercury*). The following equipment is maintained in the Facility building to facilitate containment of a hazardous material release or spill while waiting for emergency responders to arrive and take over:
  - Plastic bags and sheeting
  - Vermiculite
  - General Purpose Detergent
  - Baking Soda
  - D.O.T. containers & recovery drums
  - Shovels, brooms, and various other hand tools
  - Barricades / cones
- Respirators. Half-Mask respirators with mercury vapor cartridges and HEPA filters are available for use in an emergency. Respirators are maintained in a cabinet located in the Branch Manager's office in the Administrative Offices.
- Protective Clothing. Tyvek full-body coveralls (or similar) are available for use in an emergency to provide protection from fluorescent lamp powder (i.e. dust) and mercury particulates. Coveralls are maintained in Area C of the Facility Building.
- First Aid Kits and Eye Wash Stations. Commercial first aid kits and eye wash stations are located throughout the Facility (see **Drawing No. D7** for locations). The contents of the first aid kits or eye wash stations are used in the event of an accident.
- Mercury Vapor Analyzer. A Jerome Mercury Vapor Analyzer is maintained on-site to routinely perform air monitoring and to monitor mercury vapor emissions in an emergency. The mercury vapor analyzer is kept in the Administrative Office area.
- Communication Devices. The Emergency Coordinators carry cellular phones. Additionally, telephones are located within the Administrative Offices and Area A are available to Facility personnel to call 911 and emergency assistance.

4.5 Medical Emergency Procedures

Employee injuries at the site shall be reported immediately to the Emergency Coordinator in charge. The Emergency Coordinator shall determine whether the injury is minor and can be attended to on-site, whether it should be seen at the local walk-in clinic or whether the injury is a medical emergency that warrants immediate attention by a medical professional offsite. The Emergency Coordinator shall implement the procedures outlined below in the event of an on-site injury.

Emergency Coordinator Medical Emergency Procedures

1. Quickly evaluate the type and extent of injury. If the injury is determined to be a medical emergency follow steps 2 through 7 below.
2. Contact Ocala 911 Emergency Services with the location and details of injured party and assign a worker to stand at the Facility entrance to direct incoming emergency services personnel upon their arrival.
3. Move injured personnel ONLY if failure to do so will result in additional harm or injury.
4. Begin emergency first aid as needed on injured personnel (including CPR if needed) until emergency services personnel arrive on site and take over scene.
5. If injury is a result of an operational activity, instruct workers accordingly with appropriate emergency response to remove the risk of further injury.
6. Notify the applicable local, state, and federal agencies of such emergency as required by specific regulations.
7. Document incident and response and maintain documentation on file for a minimum period of three years.

First Aid Stations

First Aid supplies for minor injuries are available at five (5) first aid stations located throughout the Facility as shown on **Drawing No. D7**. As part of employee safety training, staff is shown where first aid stations are located.

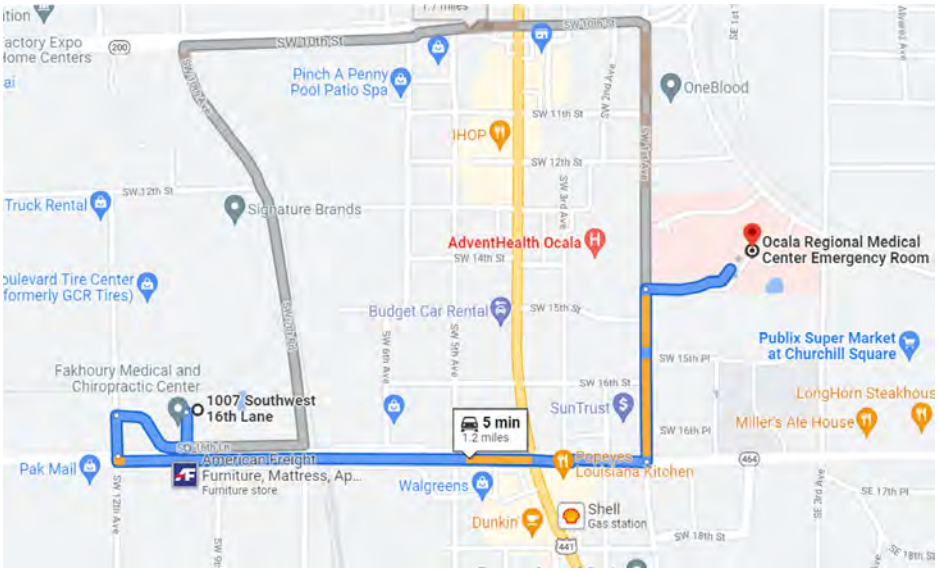
Local Medical Facility

The Ocala Regional Medical Center is located at 1431 SW 1st Ave, in Ocala, Florida, Telephone: 352-401-1000 and is approximately 1.1 miles from the Lighting Resources Facility as shown in the map on the following page.

Local Walk-in for Non-emergency

Concentra Urgent Care
2221 SW 19th Ave. Rd. Ste. 100
Ocala, FL 34471
352-629-9100

Emergency Route to Ocala Regional Medical Center



1007 SW 16th Ln
Ocala, FL 34471

- Head south toward SW 16th Ln
  280 ft
- Turn right onto SW 16th Ln
  0.1 mi
- Turn left onto SW 12th Ave
  259 ft
- Turn left at the 1st cross street onto State Rte 464 E/SW 17th St
  0.7 mi
- Turn left onto SW 1st Ave
  0.2 mi
- Turn right
  0.1 mi

Ocala Regional Medical Center Emergency Room
1431 SW 1st Ave, Ocala, FL 34471

4.6 Fire and Explosion Emergency Procedures

If a fire or explosion occurs at the Facility, notify the Emergency Coordinator immediately. A description of the incident including the location and extent as well as the threat to life or property shall be given. The Emergency Coordinator implements the procedures outlined below in the event of a fire or explosion emergency.

Emergency Coordinator Fire and Explosion Emergency Procedures

1. Quickly notify site personnel by public address system or in person, specifically instructing non-emergency trained personnel to quickly evacuate the Facility and instructing emergency trained personnel where to assembly to assist in response effort.
2. Evaluate the situation to determine if injuries are involved. If serious injuries are involved, quickly move injured parties to a safe location (as necessary) and notify

Ocala 911 Emergency Services relaying the site location and emergency situation. Assign the appropriate staff person to wait at the Facility entrance to direct emergency services personnel upon arrival.

3. Instruct emergency trained personnel to begin firefighting activities (as necessary) with available fire extinguishers if this can be done without threat to their safety. If mercury-containing materials are involved, ensure that workers are wearing proper respirators and other required personal protective equipment (PPE).
4. Begin and/or supervise first aid on injured parties as needed.
5. Evacuate workers immediately at any time that continued firefighting activities endanger them (points of evacuation throughout the Facility building, and meeting locations outside of Facility building are presented on **Drawing No. D7**).
6. Continue with and/or supervise appropriate emergency and/or first aid procedures until relieved by emergency service personnel.
7. If the incident involves mercury containing materials, inform emergency service personnel upon arrival, the need to use respirators and any other PPE, and if necessary provide emergency service personnel with appropriate PPE.
8. Notify the applicable local, state, and federal agencies of the fire or explosion emergency as required by specific regulations.
9. Document incident and response and maintain documentation on file for a minimum period of three years.

Fire Detection and Suppression Equipment

The following detection and fire suppression equipment are available at the Facility:

- Smoke and fire detection equipment
- Ten (10) Type ABC fire extinguishers
- One (1) Type D fire extinguishers
- Fire hydrant located at front of property

The locations of the fire extinguishers are shown on **Drawing No. D7** (tab section "**Drawings**"). As part of employee emergency training, staff is shown where fire extinguishers are located.

4.7 Mercury (or other Hazardous) Spill / Release Emergency Procedures

If a spill or release of mercury or other hazardous material occurs at the Facility, it is the duty of the Emergency Coordinator to provide the appropriate emergency response to prevent a threat to life or the environment. The Emergency Coordinator must be advised of any spill immediately and will make the necessary decisions necessary to implement an emergency response plan. The Emergency Coordinator shall implement the procedures outlined below in the event of a spill or release of mercury (or other hazardous material).

Emergency Coordinator Procedures for Mercury Spill / Release at Facility:

1. Quickly evaluate the situation to determine if injuries are involved. If serious injuries are involved, quickly move injured parties to a safe location (as necessary) and notify Ocala 911 Emergency Services relaying the site location and emergency situation. Assign the appropriate staff person to wait at the Facility entrance to direct emergency services personnel upon arrival. Note: move injured parties to safety ONLY if it can be

done without threat of additional injury. If movement is not possible, immediately place the injured party on oxygen.

2. Notify personnel not wearing respirators to evacuate the affected spill / release area (points of evacuation throughout the Facility building, and meeting locations outside of Facility building are presented on **Drawing No. D7**).
3. Begin and/or supervise first aid on injured personnel as necessary. Immediately cover open wounds to protect from exposure. Continue first aid until relieved by emergency services personnel.
4. Upon arrival, advise emergency services personnel of the need to use respirators and provide to them if necessary.
5. Check mercury vapor level with direct reading using a Mercury Vapor Analyzer. Continue to wear respirators until mercury vapor level drops below 0.05 mg/m^3.
6. Notify the applicable local, state, and federal agencies of incident as required by specific regulations.
7. Document incident and response and maintain documentation on file for a minimum period of three years.

Emergency Coordinator Procedures for Other Hazardous Material Spills / Release:

1. Quickly evaluate the situation to determine if injuries are involved. If serious injuries are involved, quickly move injured parties to a safe location (as necessary) and notify Ocala 911 Emergency Services relaying the site location and emergency situation. Assign the appropriate staff person to wait at the Facility entrance to direct emergency services personnel upon arrival. Note: move injured parties to safety ONLY if it can be done without threat of additional injury. If movement is not possible, immediately place the injured party on oxygen.
2. Notify personnel to evacuate spill / release area and wait for emergency responders to contain and cleanup spill / release (points of evacuation throughout the Facility building, and meeting locations outside of Facility building are presented on **Drawing No. D7**).
3. Begin and/or supervise first aid on injured personnel as necessary. Immediately cover open wounds to protect from exposure. Continue first aid until relieved by emergency services personnel.
4. Notify the applicable local, state, and federal agencies of incident as required by specific regulations.
5. Document incident and response, and maintain documentation on file for a minimum period of three years.
6. Notify the applicable local, state, and federal agencies of incident as required by specific regulations.
7. Document incident and response and maintain documentation on file for a minimum period of three years.

If a spill or release of mercury occurs en route to the Facility, it is the duty of the Emergency Coordinator to provide the appropriate emergency response to prevent a threat to life or the environment. The Emergency Coordinator is to be advised of any spill immediately and makes the necessary decisions necessary to implement an emergency response plan. The Emergency Coordinator will implement the procedures outlined below.

Emergency Coordinator and/or Driver Procedures for Mercury Spill En Route to Facility

1. Quickly evaluate the situation to determine if injuries are involved. If serious injuries are involved, quickly move injured parties to a safe location (as necessary) and notify **911** Emergency Services relaying the site location, emergency situation, and assistance needed. Note: move injured parties to safety ONLY if it can be done without threat of additional injury.
2. Notify personnel not wearing respirators to evacuate the affected spill area. Use vehicle Warning Triangles to mark the spill area and to warn other motorists of the accident site as necessary.
3. Lighting Resources LLC employees have access to the ChemTel Chemical Expert Assistance Hotline by dialing 1-800-255-3924. ChemTel also provides an emergency response team if required.
4. Begin and/or supervise first aid on injured personnel. Immediately cover open wounds to protect from mercury exposure. Continue first aid until relieved by emergency services personnel.
5. Drivers will put on appropriate PPE (respirator, Tyvek suit, gloves, etc.), and cover any mercury contaminated materials leaking or seeping from the vehicle with a mercury absorbent type powder or decontaminant powder (e.g., MerconSORB™, Hg Absorb®, HgX , or other approved equivalent). The affected spill area is to be covered with a tarp after powder is applied to prevent airborne spread of the spill.
6. If necessary, advise emergency services personnel of the need to use respirators.
7. Do not open vehicle cargo area door until Emergency Coordinator and/or emergency response team is on site unless you can be reasonably sure that container (lamps, lamp boxes, etc.) breakage is very limited and that opening the vehicle cargo container will not contribute to additional release of mercury contaminated materials.
8. Upon notification of a spill incident by a company driver or emergency services personnel, the Emergency Coordinator will immediately notify the following agencies of the spill event:
    - Florida DEP Emergency Response Office: 407-897-4100
    - State Warning Point: 800-320-0519
    - National Response Center: 800-424-8802
    - Emergency Response Team .Chem-tel 800-255-3924
9. The Emergency Coordinator and/or driver will depart the scene only after the scene has been appropriately contained and remediated by the emergency response team.
10. Notify the applicable local, state, and federal agencies of incident as required by specific regulations.
11. Document incident and response and maintain documentation on file for a minimum period of three years.

NON-HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Waste Tracking Number
FLR000070565	1	800-255-3924	USEC011062023

GENERATOR

5. Generator's Name and Mailing Address: Lighting Resources LLC
1007 SW 16th Ln.
Ocala, Fl 34471
Generator's Phone: 352-509-3001

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Lighting Resources LLC
U.S. EPA ID Number: FLR000070565

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address: US Ecology
2002 N. Orient Rd.
Tampa, Fl 33619
Facility's Phone: 813-319-3427
U.S. EPA ID Number: FLD981932494

	9. Waste Shipping Name and Description	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	
1.	Non-Hazardous floor sweep for disposal	11	DF	1,275	P	
2.						
3.						
4.						

13. Special Handling Instructions and Additional Information

14. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offeror's Printed/Typed Name: Nicolas J. Nastav
Signature: Nicolas J. Nastav
Month: 11 Day: 3 Year: 23

INT'L

15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter Signature (for exports only): Date leaving U.S.:

TRANSPORTER

16. Transporter Acknowledgment of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Transporter 1				
Transporter 2				

DESIGNATED FACILITY

17. Discrepancy

17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

17c. Signature of Alternate Facility (or Generator)
Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name	Signature	Month	Day	Year

Lighting Resources LLC

TRAINING LOG

INSTRUCTOR	DATE OF TRAINING	CLASS TITLE
[signature]	9/18/23	Emer.Procedures/ Contingency Plan

The Employees listed have satisfatory participated and been tested per Regulation/Company training requirements.

	Employee Name (Printed)	Position	Employee Signature
1	Karla Murphy	Office Admin.	[signature]
2	Matt Wegner	Logistics Coord.	[signature]
3	Luis Navarro	Driver	[signature]
4	James Carmona		[signature]
5	Robert Peralta		[signature]
6	Susan Phillips		[signature]
7	Sherri Bankhead	Sorter	[signature]
8	Teresa Bratcher	Sorter	[signature]
9	Charles H Baugh		[signature]
10	Cecil Creech JR.	Processing	[signature]
11	Matthew Goebeck	Sorter	[signature]
12	Herbert Mitchell	processing	[signature]
13	Oree Mcfellon	processor	[signature]
14	Jerry Steele	Processor	[signature]
15	Taylor Mcneal	Processor	[signature]
16	Ramon Vasquez	Processor	[signature]
17	Frank Vasquez		[signature]
18	Anthony Thomas		[signature]

[signature]
Instructors Signature

9/18/23
Date

Lighting Resources LLC

TRAINING LOG

INSTRUCTOR	DATE OF TRAINING	CLASS TITLE
		Emer.Procedures/ Contingency Plan

The Employees listed have satisfatory participated and been tested per Regulation/Company training requirements.

Employee Name (Printed)	Position	Employee Signature
Nick Nastav	OPS MGR.	

Instructors Signature

9/18/23
Date

Lighting Resources LLC
Employee Training Program
Procedures and Steps

Step 1.

All new hire employees must complete the required training courses per the attached positional training matrix. This training must be completed within 90 days of their hire date.

Employees that will be required to wear a respirator must complete the following procedures prior to working in an environment where a respirator is required.

a. Employee must have a medical evaluation to determine if they can wear a respirator.
b. Employee must have a respirator fit test conducted for the respirator they will be wearing.
c. Employee must have the Respiratory Protection Training.

Please Note: If an employee is moved or changes positions/duties they must complete any additional courses required by their new position.

Step 2.

Training courses will be conducted utilizing the Mineral online training portal and PowerPoint training presentations in Microsoft shared folder. Training is required per the attached positional training matrix. Managers should have admin credentials for the Online training portal, allowing them to setup and conduct training as necessary.

Step 3.

Each employee must sign and date the provided training logs for each training course they attend.

A copy of this attendance log must be kept in the master training binder along with a copy in the employee's personnel file.

Step 4.

Refresher training will be conducted annually according to the attached Exhibit A. training calendar. The majority courses have PowerPoint training presentations that can be utilized to conduct these refresher courses. The remaining courses without a PowerPoint training presentation may be conducted using the original training material (Video on Demand, Online Training Module, or DVD)

Please Note: All pertinent PowerPoint presentations are store in shared folders on Microsoft SharePoint.

Required Annual Training Reviews:

1. Hazcom (Hazardous Communications, Contingency Plan, Emergency Procedures) **ALL Branches**
2. RCRA Training – LQG Branches (IN, FL, AZ, CA,)
3. Respiratory Protection (All lamp processing branches, applicable employees)
4. Lockout- Tagout – All branches

Exhibit A.
Annual Training Refresher and Review Calander Schedule

- **January – *Hazcom, Emergency Action/Contingency Plan,**
- **February – **RCRA Hazardous & Waste Respiratory Protection,**
- **March – ** Hazwopper, / Mercury Right to Know**
- **April- Lockout/ Tagout**
- **May – Forklift**
- **June – Fire Extinguisher**
- **July – Heat Stress**
- **August - Personal Protective Equipment**
- **September - Bloodborne Pathogens**
- **October – Hazmat**

***Note: Hazcom/ Emergency Action / Contingency Plan/ training must be conducted annually or at anytime there is a change in operations or contact personnel**

****RCRA Hazardous Waste Training**
****Hazwoper Mgr. 8hr. Review**
are only applicable to sites designated/permitted as large quantity generators of hazardous waste