

From: [Buselli, Bradley](#)
To: [Jon Barnett](#)
Cc: [Petersen, Dane](#); [Smith, Michell M.](#)
Subject: RE: Meeting with OGC
Date: Wednesday, October 16, 2024 11:16:00 AM

Jon, for a brief summary of our October 10th discussion regarding the inquiry into the requirements of Subsection 62-737.840(4), Florida Administrative Code (F.A.C.), please see the following.

The facility indicated that recent hazardous waste determinations show that the phosphor powder generated from mercury recovery does not exceed the toxicity characteristic for mercury. The Department clarified that regardless of the determinations, shipments must “*be accompanied by a uniform hazardous waste manifest,*” as stated in Subsection 62-737.840(4), F.A.C.

However, the facility can indicate on the manifest whether the materials are hazardous or non-hazardous (based on the hazardous waste determinations) and make necessary decisions regarding selecting an appropriate transporter. Generally, where the transportation activity does not involve the transportation of any hazardous waste, the facility will not be out of compliance with Rule 62-730.170, F.A.C., for hiring a non-hazardous waste transporter.



Bradley Buselli
Florida Department of Environmental Protection
Division of Waste Management
Hazardous Waste Program & Permitting
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From: Jon Barnett <jon.barnett@lightingresourcesinc.com>
Sent: Thursday, October 10, 2024 2:03 PM
To: Buselli, Bradley <Bradley.Buselli@FloridaDEP.gov>
Subject: RE: Meeting with OGC

EXTERNAL MESSAGE

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Hey Bradley,

I appreciate you all taking the time to meet with us today and clear up the concerns we had regarding the shipment of our phosphor powder. Do you think it would be possible to get anything in writing from the department covering what discussed today? Would just like to have something on file in case any questions ever arise during vendor audits or inspections.

Again, thank you for all your help!

Jon Barnett
Environmental Health & Safety Specialist

Lighting Resources, LLC
Mobile: (423) 426-1854
jon.barnett@lightingresourcesinc.com

From: Buselli, Bradley <Bradley.Buselli@FloridaDEP.gov>
Sent: Thursday, October 3, 2024 10:38 AM
To: Jon Barnett <jon.barnett@lightingresourcesinc.com>
Subject: RE: Meeting with OGC

Thanks Jon. I just sent out the meeting invite.



Bradley Buselli
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From: Jon Barnett <jon.barnett@lightingresourcesinc.com>
Sent: Wednesday, October 2, 2024 12:53 PM
To: Buselli, Bradley <Bradley.Buselli@FloridaDEP.gov>
Subject: Meeting with OGC

EXTERNAL MESSAGE

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Hey Brad,

Just following up for the call next week. The people we need on the invite are listed below.

Seth Ray – seth.ray@lightingresourcesinc.com
Ron Hughes – ron.hughes@lightingresourcesinc.com
Kevin McMullen – kevin@recycletechnologies.com
Jon Barnett – jon.barnett@lightingresourcesinc.com

We'd like to shoot for 1:00 PM next Thursday 10/10/24. Please let me know if you need anything else.

Thanks,

Jon Barnett
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