

Eckoff, Michael

From: Steve Barnett <steve.barnett@lightingresourcesinc.com>
Sent: Tuesday, November 28, 2023 2:22 PM
To: Eckoff, Michael
Cc: Jon Barnett; Kevin McMullen
Subject: Dec 7th Visit
Attachments: Dec. 7th Meeting .docx

EXTERNAL MESSAGE

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Hello Michael,

I hope you and Family had a safe and wonderful Thanksgiving !

We are looking forward to meeting you next week on the 7th. I have attached a letter for you to review outlining the purpose of our visit.

Jon Barnett who works with me in compliance and our EH&S guy will be joining me for the meeting.

Please send me any direction we may need to get to the right location for our meeting.

Thanks again for your time.

Have a great day,
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

Cell: 423-534-6717

Steve.barnett@lightingresourcesinc.com

Web: www.lightingresourcesinc.com



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

November 28, 2023

RE: Meeting December 7, 2023 9:30 AM at FLDEP Central Office Orlando, FL

Dear Mr. Eckoff,

Lighting Resources LLC (LRL) appreciates the opportunity to meet with you and the FLDEP staff to discuss modification status of our permit at our Ocala FL facility.

The purpose of this meeting is to discuss the procedures we need to take to modify our current status as a large quantity generator of hazardous waste (LQG) to a VSQG.

Per our current permit the only two waste streams generated at our facility listed as hazardous waste are

- 1.) Recovered phosphor powder
- 2.) Air filter media (spent cartridges, floor sweep, PPE, Air filters, etc.)

Waste Stream 1. Phosphor Powder

At the time of the original permit application a waste determination was made by assumption of old data from early 2000's T12 fluorescent lamps.

We are prepared to demonstrate that the mercury content in today's new fluorescent lamps has been drastically reduced compared to the old T12 lamps, from which the initial waste determination was made. Therefore, analytical reports on today's recovered phosphor powder generated from the recycling process of fluorescent lamps are below the TCLP hazardous waste limit of 0.20 for mercury.

We also believe the recovered phosphor powder would fall under the solid waste exclusions listed in 40 CFR 261.4(a)(24). The phosphor powder recovered from the recycling of lamps goes for further recycling (retorting). The retort process recovers a sellable product in the form of elemental mercury. The retorted phosphor powder is then sent for further processing and recovery of the rare earth metals contained within the phosphor powder. This process assures a 99.999 % recovery of mercury from the phosphor powder and well below any RCRA concerns of being hazardous.

Waste Stream 2. Air filter media

Due to the lower concentration of mercury in today's lamps, and stringent housekeeping rules implemented at LRL facilities, analytical testing shows results below the mercury TCLP limit of 0.20 for hazardous waste for all air filter media (PPE, floor sweeping compound, respirator cartridges, air filters). In most cases the analytical shows results below the mercury LDR treatment standard of 0.025, or a non-detect for mercury.

With the above information we are requesting that our generator status of a LQG be modified to a non-hazardous waste generator or a VSQG status.

We do not anticipate any changes to our day-to-day operations stated in our current permit, other than those required by an LQG facility.

We look forward to meeting with you December 7th, 2023 and sincerely appreciate your guidance on the requirements to making these modifications to our permit and generator status.

We will provide current analytical reports on the above waste streams along with any other pertinent information requested for making this determination.

Sincerely,

Steve Barnett
Vice President Compliance & Material Management
Lighting Resources LLC
Direct Phone: 423-534-6717
Email: steve.barnett@lightingresourcesinc.com

Cc: Jon Barnett
Kevin McMullen