



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

FACILITY INFORMATION:

Facility Name: Lighting Resources LLC

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

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

ME ID#: 40403

EPA ID#: FLR000070565

Facility Street Address: 1007 SW 16th Ln, Ocala, Florida 34471

Contact Mailing Address: 1007 SW 16th Lane, Ocala, Florida 34471

County Name: Marion

Contact Phone: (352) 509-3001

NOTIFIED AS:

LQG (>1000 kg/month), TSD Facility, Transporter

WASTE ACTIVITIES:

Generator: LQG **Other Status:** Offsite Waste Received **Transporter:** Commercial Waste **TSD:** Treater, Operating Commercial TSD **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Batteries, Mercury Containing Lamps, Mercury Containing Devices **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** 5000 kg or more; Large Quantity Handler (LQH), Mercury containing devices (LQH) - 100kg or more accumulated, Mercury containing lamps (LQH) - 2000kg or more accumulated **Destination Facility for UW Mercury Recovery and/or Reclamation**

INSPECTION TYPE:

Routine Inspection for TSD Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Michael Eckoff, Inspector

Other Participants: Parvez Mallick, Environmental Engineer, Mark Anthony Relon, Environmental Engineer, Buff Fritz, Branch Manager, Nick Nastav, Operations Manager

LATITUDE / LONGITUDE: Lat 29° 10' 20.7785" / Long 82° 8' 49.0004"

NAIC: 562920 - Materials Recovery Facilities

TYPE OF OWNERSHIP: Private

Introduction:

On August 8, 2023, Michael Eckoff, Florida Department of Environmental Protection (FDEP or Department), Parvez Mallick and Mark Anthony Relon, US Environmental Protection Agency (US EPA) - Region 4, accompanied by Buff Fritz and Nick Nastav, Lighting Resources, LLC (LR or Facility), inspected LR for compliance with permit number 309339-004-HO. The permit was issued on August 2, 2022 and expires on July 6, 2027.

The facility most recently notified the Department 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 lamps, batteries, and mercury containing devices, a destination facility for universal waste, a transporter of universal waste, a mercury recovery and/or reclamation facility, and a transporter of hazardous waste. LR originally received EPA ID FLR000070565 on February 17, 2011. The facility began lamp processing operations at this location on July 11, 2012.

Operating hours are from 8 AM to 5 PM, Monday to Friday, for office personnel and in two shifts from 6 AM to 11 PM, Monday to Friday, for processing personnel. LR has three drivers and operates one semi and two straight trucks. The trucks are leased from Penske who also provides maintenance services. LR is connected to the municipal wastewater collection and potable water systems.

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Inspection History (Past 5 Years):

LR was inspected on January 28, 2021, by the Department for compliance with its permit and no potential violations were noted at that time.

LR was inspected on December 5, 2019, in response to a fire on November 28, 2019 in the Balcan Room where the lamp processing equipment is located. The fire destroyed several pallets of fiber containers storing lamps and the lamp processing machine. Repairs to the processing room itself were completed in June 2020 and installation of the new Balcan lamp processing machine was completed in September 2020. Because the equipment was an exact replacement of the permitted equipment, no updates to the RCRA permit were required.

LR was inspected on January 25, 2019, by the Department for compliance with its permit and was not in compliance at that time. The facility failed to comply with the permit requirements by exceeding the 12-week average total mercury content of 1 ppm for glass and metal wastes on seven occasions and the total mercury content of 3 ppm on two occasions. Also, records of the 12-week average was not maintained as required. The violations were corrected, and case was resolved through the issuance of a consent order, OGC case number 19-0381, that included the assessment of civil penalties.

Process Description:

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 on-site, 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.

Inspection of the warehouse found shrink-wrapped pallets of universal waste batteries near the south end of the building ready for off-site shipment. In the southwest corner of the warehouse was storage of empty fiber drums for customers' use.

Row 10 contained 34 55-gallon drums of crushed mercury lamps. The oldest storage start date was 5/1/2023. Nine of the 34 containers were rejected waste due to the contents being wet. Facility personnel stated it is being sent back to the respective customer client(s) for reevaluation before accepting the material again.

Row 9 contained 43 55-gallon drums of mercury containing devices, non-PCB magnetic, and batteries. The oldest storage start date was 1/5/2023.

Row 8 contained 13 Gaylord boxes of electronic waste and four boxes of scrap metal. The oldest storage start

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date was 8/1/2023.

Row 7 contained 32 55-gallon drums and two boxes of universal waste batteries. The oldest storage start date was 1/23/2023.

Row 6 contained 31 55-gallon or 30-gallon drums of multiples wastes, including electronic waste, non-PCB waste, universal waste batteries, and one container of airbags. The air bags' storage start date was 5/11/2022.

NOTE: On September 13, 2023, facility personnel provided through email claiming the airbags are not a waste per RCRA Online (RO) 14920 and will be reclaimed at another facility once shipped.

Row 5 contained 24 containers of universal waste batteries that were undergoing consolidation for off-site shipment. The oldest storage start date was 7/10/2023.

Row 4 contained one pallet of mixed universal waste lamps and four 30-gallon drums of lead-acid batteries and electronic waste. The oldest storage start date was 6/14/2023.

Rows 2 and 3 were empty.

Row 1 contained one pallet and four Gaylord boxes of universal waste lamps and one pallet of electronic waste. The oldest storage start date was 7/24/2023.

The labels on the all the containers in all the rows did not contain the customer or generator [403.727(1)(c), Florida Statutes (F.S.)].

The received date was not marked on two pallets of used batteries [403.727(1)(c), F.S.].

The middle of the warehouse was being used as a workflow area for processing and sorting of materials 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 containers of mercury containing devices;
- Four containers of alkaline batteries;
- 15 containers of lithium metal batteries; and
- One partial pallet of lead acid batteries.

All of the containers were closed and properly labeled and marked.

Located along the east wall near the bay doors was one 55-gallon drum containing floor sweepings. The drum was closed and properly labeled. The drum was not marked with an indication of the hazards of the contents [40 CFR 262.15(a)(5)(ii)].

In a covered area outside the warehouse and next to the loading dock is shatter shield processing and electronics recycling staging. Shatter shields are removed from lamps before processing in the Balcan. Four Gaylord boxes of lamps were in this area. Several containers and boxes of toner, wire, non-PCB capacitors, ballasts, scrap metal, and electronic waste were in the area.

NOTE: 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. According to the permit, processing of fluorescent

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lamps takes place solely within the facility building [403.727(1)(c), F.S.].

In the Balcan processing area staff were actively processing lamps. Located beneath each of the two phosphor powder collection points associated with the Balcan is a 55-gallon drum for accumulation of mercury contaminated powder. Both of the drums were properly labeled, dated, and marked.

The central accumulation area (CAA) is located in this area and contained the following wastes:

- Seven 55-gallon drums of hazardous waste floor sweepings. The oldest accumulation start date was 4/5/2023 [40 CFR 262.17(b)];
- 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
- 11 55-gallon drums of hazardous waste phosphor powder. The oldest accumulation start date was 7/13/2023.

All of the containers were closed, properly labeled, dated, and marked.

Warehouse C

Glass cutlet was accumulating in two 20-yard roll-off containers, one was full and one was partially full. 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). Sampling at the roll-off container does not meet permit sampling location requirements.

NOTE: 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.

Also in the warehouse were containers of bulb ends, LED ballasts, X-ray film, and incandescent lamps.

One Gaylord box of fluorescent lamps with shatter shields was in the warehouse. According to the permit, fluorescent lamps for processing are required to be placed in Rows 1 through 9 in the main warehouse [403.727(1)(c), F.S.].

Supplies are also stored in this warehouse.

Outside the northeast side of the building were three tractor-trailers. One contained fluorescent lamps with shatter shields. According to the permit, fluorescent lamps for processing are required to be placed in Rows 1 through 9 in the main warehouse [403.727(1)(c), F.S.]. Another contained supplies. The third contained pallets.

Outside the north end of the building was empty drum storage. The drums will be sent for recycling.

Records Review:

A review of the contingency plan revealed the alternate #2 emergency coordinator (Raenell Norris) no longer works at the facility [40 CFR 264.54(d)].

NOTE: Once update, please provide a copy of the plan to local emergency response organizations per 40 CFR 264.53(b).

The annual review of the contingency plan was not documented [403.727(1)(c), F.S.].

A copy of the permit and application is maintained on site.

A review of job titles and position descriptions, annual training, and weekly inspection logs did not reveal any issues.

Manifests were available for review from 2020 to 2023. LR utilizes Lighting Resources (TXD008029191),

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Lighting Resources LLC (IN0000351387), and 1522 Lighting Resources (AZD983476680) as final designated facilities.

New Potential Violations and Areas of Concern:**Violations**

Type: Violation
Rule: **262.15(a)(5)(ii)**
Explanation: 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.

Corrective Action: Lighting Resources, LLC is required to mark or label its containers with 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).

Please provide documentation of the container properly marked to the Department within 30 days from the date of your receipt of this report.

Type: Violation
Rule: **262.17(b)**
Explanation: 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.

Corrective Action: Lighting Resources, LLC accumulated hazardous waste for more than 90 days and 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.

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.

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Type: Violation
Rule: 264.54(d)
Explanation: 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.

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.

Type: Violation
Rule: 403.727(1)(c)
Explanation: 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.

On September 13, 2023, facility personnel stated in an email that the cubic yard box of shatter shield lamps was 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.

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.

Conclusion:

Lighting Resources was inspected as a permitted mercury recovery facility and was not in compliance at that time.

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1.0: Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

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

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	✓		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

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Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

Michael Eckoff
Principal Investigator Name

Inspector
Principal Investigator Title

Michael Eckoff
Principal Investigator Signature

DEP 10/23/2023
Organization **Date**

Parvez Mallick
Inspector Name

Environmental Engineer
Inspector Title

US EPA - Region 4
Organization

Mark Anthony Relon
Inspector Name

Environmental Engineer
Inspector Title

US EPA - Region 4
Organization

Buff Fritz
Representative Name

Branch Manager
Representative Title

Lighting Resources, LLC
Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Nick Nastav
Representative Name

Operations Manager
Representative Title

Lighting Resources, LLC
Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:

Approver: Viviana Useche

Inspection Approval Date: 10/25/2023

