

## STATE OF TENNESSEE TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION JOHNSON CITY ENVIRONMENTAL FIELD OFFICE

2305 SILVERDALE DRIVE JOHNSON CITY, TENNESSEE 37601-2162 (423) 854-5400 STATEWIDE 1-888-891-8332 FAX (423) 854-5401

August 31, 2021

Mr. Steve Barnett Vice President Tennessee Operations Lighting Resources LLC 2212 Buffalo Rd. Ste. 210 Johnson City, TN 37604

RE: PRB Update, To Include Accepting Universal Waste Aerosol Cans

Notice of Deficiency

Lighting Resources LLC. (2212 Buffalo Rd. Ste. 210) SWP # 90-000-1576

Dear Mr. Barnett:

The Division of Solid Waste Management (DSWM) is in receipt of your updated permit July 9, 2021 and received on August 6, 2021, requesting approval of up the dated PBR permit to the above referenced facility permit. Specifically, the updated permit request is to allow the Lighting Resources, LLC (2212 Buffalo Rd. Ste. 210) to accept Universal Waste Aerosol Cans for recycling, with no processing/puncturing of the can at the facility, accumulated to ship to a permitted processor.

After review of the minor modification application documents, several minor deficiencies require further clarification or revision and are listed below.

- 1. Provide updated 3<sup>rd</sup> party Closure Cost worksheet for the requested changes in the permit, namely to cover 10 cubic yards of universal waste aerosol cans.
- 2. Clarify in the Narrative of Waste Acceptance, second paragraph, if only "Universal Waste Aerosol Cans" will be accepted.
- 3. Add Universal Waste Aerosol Cans to response to Condition XIV.

A complete copy of the permit should be resubmitted when responding to the NOD. If the minor permit modification is approved, the JCEFO will need to have one "complete" hard copy and one complete electronic PDF version of the permit.

If you have any questions concerning this letter or the attached comments, please not do hesitate to contact me at (423) 854-5431 or George. Thornsbury@tn.gov.

Lighting Resources, LLC August 31, 2021 Page 2 of 2

Sincerely,

George M. Thornsbury, P.E., JCFO Division of Solid Waste Management

cc: Chris Lamb, Field Office Manager, DSWM JCEFO (email)
Rob Ashe, Dep. Director of Field Offices, DSWM JCEFO (email)
Rob Burnette, P.E. Program Manager, DSWM Nashville (email)
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