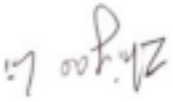




The individual signing the enclosed Agreed Order should be the President of the company or other authorized signatory. The timely entry into an Agreed Order, which saves you and IDEM time and resources, may lead to a reduction in the civil penalty. IDEM is not required to extend the offer of entry into an Agreed Order for more than sixty days. You may enter into an Agreed Order without admitting that the violations occurred. If an Agreed Order is not entered into, IDEM may proceed to issue a unilateral notice and order requiring compliance with the environmental permit conditions, including payment of a civil penalty. Please contact me at (317) 234-1491 or zli@idem.in.gov if you have any questions or if you wish to request a settlement conference.

Sincerely,



Zhiyao Li  
Case Manager  
Enforcement Section  
Office of Air Quality

Enclosures:

cc: Nick Nastav, Lighting Resources, LLC. ([nick.nastav@lightingresourcesinc.com](mailto:nick.nastav@lightingresourcesinc.com))  
David Camfield, Lighting Resources, LLC. ([david.camfield@lightingresources.com](mailto:david.camfield@lightingresources.com))  
Nathan Frank, US EPA Region 5  
Zhiyao Li, Compliance and Enforcement Branch, OAQ  
Vaughn Ison, Compliance and Enforcement Branch, OAQ  
<http://www.in.gov/idem>



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-8027 • (317) 232-8803 • Fax (317) 233-8847 • [www.idem.IN.gov](http://www.idem.IN.gov)

Mike Braun  
Governor

Clint Woods  
Commissioner

July 31, 2025

## **NOTICE OF VIOLATION**

Via Electronic Mail:

To: Lighting Resources, LLC  
Attn: Kevin McMullen, President  
498 Park 800 Drive  
Greenwood, IN 46143  
[kevin.mcmullen@lightingresourcesinc.com](mailto:kevin.mcmullen@lightingresourcesinc.com)

Via Electronic Mail:

To: Jon Barnett, Registered Agent  
498 Park 800 Drive  
Greenwood, IN 46131-0000  
[jon.barnett@lightingresourcesinc.com](mailto:jon.barnett@lightingresourcesinc.com)

Case No. 2024-30326-A

Pursuant to Indiana Code ("IC") 13-30-3-3, the Indiana Department of Environmental Management ("IDEM") issues this Notice of Violation. Based on an investigation including record reviews and an inspection conducted on June 21, 2024 by an IDEM representative, IDEM has reason to believe Lighting Resources, LLC ("Respondent") violated environmental permit conditions. The violations are based on the following:

1. Respondent is Lighting Resources, LLC, which owns and operates the stationary fluorescent bulb and HID bulb de-manufacturing source with Plant ID No. 081-00030, located at 498 Park 800 Drive, in Greenwood, Johnson County, Indiana ("Site").
2. Pursuant to Federally Enforceable State Operating Permit ("FESOP") 081-43785-00030 ("Permit") Condition D.1.11(a), Respondent shall, at least annually, collect a representative sample of rainwater runoff from the roof and source property to verify that mercury is not being washed away from the source in rainwater or other precipitations events.

Respondent failed to perform rainwater sampling in 2023, in violation of Permit Condition D.1.11(a).

3. Pursuant to Permit Conditions D.1.7(b) and D.1.12, Respondent shall keep the carbon adsorption unit in operation and capture and control mercury at all times when the mercury retort machine is in operation, and the carbon beds will be deemed saturated when mercury readings in the vent stream after the carbon beds exceed 0.05 micrograms per cubic meter.

Visit [on.IN.gov/survey](https://on.IN.gov/survey) or scan the QR code to provide feedback.

*We appreciate your input!*



Let's keep it real. 01/2/2024

Respondent exceeded the daily mercury reading limit of less than 0.05 micrograms per cubic meter for fifty-three (53) days between January and September of 2023, in violation of Permit Conditions D.1.7(b) and D.1.12.

4. Pursuant to Permit Conditions D.1.12 and D.1.13(c), Respondent shall obtain samples from the vent streams on a daily basis and the samples shall be used to obtain a reading of the mercury content in the vent streams.

Respondent failed to conduct daily sampling of mercury from November 28, 2022 to January 19, 2023, in violation of Permit Conditions D.1.12 and D.1.13(c).

5. Pursuant to Permit Condition C.17(a), Respondent shall submit Quarterly Deviation and Compliance Monitoring Reports not later than thirty (30) days after the end of the reporting period.

Respondent failed to timely submit the Quarterly Deviation and Compliance Monitoring Reports for the second quarter of 2022, fourth quarter of 2022, first quarter of 2023, second quarter of 2023 and third quarter of 2023, in violation of Permit Condition C.17(a).

Pursuant to IC 13-30-3-3, the Commissioner herein provides notice that the violations may exist and offers an opportunity to enter into an Agreed Order providing for the actions required to correct the violations and, as necessary and appropriate, for the payment of a civil penalty. The Commissioner is not required to extend this offer for more than sixty (60) days.

Pursuant to IC 13-30-3-3, an alleged violator may enter into an Agreed Order without admitting the violations occurred. IDEM encourages settlement by Agreed Order, thereby resulting in quicker correction of the environmental violations and avoidance of extensive litigation. Timely settlement by Agreed Order may result in a reduced civil penalty. Also, settlement discussions will allow Respondent the opportunity to present any mitigating factors that may be relevant to the violations.

If an Agreed Order is not entered into within sixty (60) days of receipt of this Notice of Violation, the Commissioner may issue a Notice and Order under IC 13-30-3-4 containing the actions that must be taken to correct the violations and requiring the payment of an appropriate civil penalty. Pursuant to IC 13-30-4-1, the Commissioner may assess penalties of up to \$25,000 per day for each violation.

Please contact Zhiyao Li at 317-234-1491 or [zli@idem.in.gov](mailto:zli@idem.in.gov) within fifteen (15) days after receipt of this Notice to discuss resolution of this matter.

For the Commissioner:



Date: 7-31-25

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Janusz Johnson, Chief  
Compliance and Enforcement Branch  
Office of Air Quality

cc: Nick Nastav, Branch Manager, [nick.nastav@lightingresourcesinc.com](mailto:nick.nastav@lightingresourcesinc.com)  
David Camfield, Operations Manager, [david.camfield@lightingresources.com](mailto:david.camfield@lightingresources.com)  
Nathan Frank, US EPA Region 5  
Johnson County Health Department  
Zhiyao Li, Compliance and Enforcement Branch, Office of Air Quality  
Vaughn Ison, Compliance and Enforcement Branch, Office of Air Quality  
IDEM Public File

**From:** [postmaster@lightingresourcesinc.com](mailto:postmaster@lightingresourcesinc.com)  
**To:** [kevin.mcmullen@lightingresourcesinc.com](mailto:kevin.mcmullen@lightingresourcesinc.com)  
**Subject:** Delivered: Lighting Resources, LLC (30326-A) Notice of Violation & Proposed Agreed Order  
**Date:** Thursday, July 31, 2025 9:09:00 AM  
**Attachments:** [Lighting Resources LLC \(30326-A\) Notice of Violation Proposed Agreed Order.msg](#)

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Your message has been delivered to the following recipients:  
[kevin.mcmullen@lightingresourcesinc.com](mailto:kevin.mcmullen@lightingresourcesinc.com) ([kevin.mcmullen@lightingresourcesinc.com](mailto:kevin.mcmullen@lightingresourcesinc.com)) <<mailto:kevin.mcmullen@lightingresourcesinc.com>>  
Subject: Lighting Resources, LLC (30326-A) Notice of Violation & Proposed Agreed Order

**From:** [Jon Barnett](#)  
**To:** [ROBERTS, GOLDIE](#)  
**Subject:** Read: Lighting Resources, LLC (30326-A) Notice of Violation & Proposed Agreed Order  
**Date:** Thursday, July 31, 2025 9:07:40 AM  
**Importance:** High

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Your message

To: Jon Barnett  
Subject: Lighting Resources, LLC (30326-A) Notice of Violation & Proposed Agreed Order  
Sent: Thursday, July 31, 2025 9:06:04 AM (UTC-05:00) Eastern Time (US & Canada)  
was read on Thursday, July 31, 2025 9:07:15 AM (UTC-05:00) Eastern Time (US & Canada).