From: Tracy DePaola
To: Kothur, Bheem;
cc: Tripp, Anthony;
Subject: RE: AERC
Date: Tuesday, March 06, 2012 7:44:11 PM
Attachments: Attachment 9,Exhibit D.7.4 Section 2 Daily Air Monitoring Procedure.pdf
Table D 9-2 Closure Plan Cost Estimate Updated 2-29-12.pdf
Attachment 9 Item D.7, Worker Health & Safety Plan.pdf
Attachment 6 Item D.4 Storage Area.pdf
Attachment 3 item B.2 Facility Features Drawing.pdf

Good Evening Bheem and Anthony,

I was waiting for my VP of Operations to review the revised Closure Plan Estimate and as I mentioned he was at our California facility last week and was not back in the office until yesterday.

I have copied and pasted the information discussed in past e-mails with responses and attachments.

After your review of the attached documents, please let me know if this is sufficient to complete the AERC – Mercury Recovery Facility Permit Renewal Application. If I recall, only the pages that were requested that needed to be changed would be allowed to be submitted via e-mail to replace within the Binder that you currently have.

Please confirm or let me know the additional procedures or items that will need to be addressed.

Thank you again for your patience and understanding and I look forward to hearing back from you soon regarding the above documents.

Respectfully,

Tracy DePaola
Regional District Branch Manager

AERC – West Melbourne, FL
Phone: 321-952-1516

1) **Item 20, Tab 12, Attachment 9, Exhibit D.7.4 (Daily Air Monitoring Procedure**) needs revision in section 2.0 (on page 3 of 10 or 1 of 7) to

indicate where locations 02, 04 and 05 are located. The locations 02, 04 and 05 were removed from sentence. As we discussed these were specific to AERC facility locations not locations throughout the West Melbourne, FL facility.

2) **Item 30, Tab 14, Attachment 11, Table 9.2 – (Closure Plan Estimate)** - You indicated that this still needs further revisions. It was agreed that AERC could provide a revised draft for your review and discussion. Please see attached revised Closure Plan Estimate for your review and provide feedback that all items were changed as requested.

#1.0 Phosphorus Powder is at $225/drum. You indicated that you have seen quotes of $355/drum on other Closure Plans. AERC indicates that since AERC could process this material at its Allentown facility, the costs would be lower. You indicated that the plan should represent worst case, which would be that AERC Allentown could not process the Florida waste. We indicated that your request would be reviewed further and a new estimate would be given to you. Changed pricing to $325 per drum.

#2.0 Mercury Devices - You indicated that the previous Closure Plan had 84 drums of mercury devices and the current one lists 20 drums. AERC indicated that AERC's maximum was only 20. AERC is willing to consider 30 drums as the maximum. AERC indicated that the previous 84 drum estimate was incorrect. You asked for the new estimate is, be provided for your review. You also indicated that you believed the $300/drum as too low and wanted the estimate at $400/drum. Changed quantities to 30 drums at $400 per drum as requested.

 # 10.0 Mobilization /Demobilization was estimated at zero dollars. You indicated that an amount is needed. It was indicated in our discussion that the cost was included in item 8.0 (Material Preparation). However, you indicated that you needed to see this cost as a separate line item. Included $1,000 for Mobilization/ Demonization cost as requested.

 # 11.0 Sampling and Analytical - You asked if this item included Air Sampling cost. AERC will review and revise as appropriate. Updated the cost of Air Sampling – New cost is now at $6,100 – added additional description that this will also include Air Sampling.

Contingency of 10% on Total Estimate - AERC included the

Contingency costs in items 12 and 13. It was indicated that AERC could remove these contingencies and instead add 10% to the total costs of closure estimate. The section titled Other Costs | Contingency will be renamed to "Other Costs". Removed Item #'s 12 and 13 and revised accordingly – instead of the 10% Contingency on total cost went ahead and increased to 15% of total Estimate.

3) **Attachment 9 - Item D.7, Worker Health and Safety Plan**

In addition, after our phone call you clarified with the ESC project assistant, Lauren Clark that the issue with the permit number was on Attachment 9 - Item D.7, Worker Health and Safety Plan, page 9 of 14. In section D.7.2 under permits, the permit # is incorrect. It should be Permit # 0072959-003-HO. AERC will correct this. This has been corrected as requested. Please see attachment.

Updates from Mr. Anthony Tripp's clarifications:

There are a couple of points that need to be clarified from the facilities December 20, 2011 response to the Request for Additional Information:

1. Attachment 6, Item D4, Storage Capacity: The capacity for the 10-day hazardous waste transfer unit needs to be specified as 89 drum equivalents. This is the value specified on Form 62-730.900(1)(b) – (8700-12FL) hazardous waste transporter registration documents previously submitted by the facility. See attachment for Item 6, D.4 for revision and please let me know if this is the area that you were speaking about with the quantities listed for the 10-day Hazardous Waste Transfer area.

2. Attachment 3, Item B.2, Facility Features Drawing: The preference would be that storage area S-4/L-4 be placed between the HW Storage and the 10-Day Transfer Area. In this manner the S-4/L-4 area can serve as a buffer between the HW and 10-Day areas. See attachment 3 – Item B.2 for the revisions as requested.

3. Attachment 3, Item B.2, Facility Features Drawing: Overflow storage from the HW Area to S-10/L-10 and S-11/L-11 is okay provided everything is properly labeled and separated and no material from the 10-day area is allowed. AERC will adhere to the following request as mentioned and will ensure that proper labeling is on containers/drums and there are no materials from the 10-day area are in these specific areas that are listed on the Features Drawing.

Please discuss these items with the facility and if you wish to discuss, give me a

call. If no further discussion is needed then you can electronically submit the updated versions of Attachments 3 and 6.

Anthony R. Tripp, Ph.D., P.E.
Professional Engineer III
Hazardous Waste Regulation Section
(850) 245-8766

From: Kothur, Bheem [mailto:Bheem.Kothur@dep.state.fl.us]
Sent: Monday, February 27, 2012 1:27 PM
To: Tracy DePaola
Cc: Tripp, Anthony
Subject: RE: AERC

Hi Tracy,
Thank you for your response.

Bheem

From: Tracy DePaola [mailto:tdepaola@aercrecycling.com]
Sent: Monday, February 27, 2012 1:24 PM
To: Kothur, Bheem
Subject: RE: AERC

Hi Bheem,

I will have the answers to yours and Anthony's questions to you with the submittal of the documents by this Friday, March 2nd.

Thank you,

Tracy DePaola

Southern Regional
District Branch Manager
Direct: 321-821-0024
Fax: 321-952-1060

Celebrating 20 Years of Environmental Service

"We are committed to a green world by helping clients in proper end-of-life management of assets containing sensitive data and components hazardous to our environment."

P ***Please consider the environment before printing this email***

From: Kothur, Bheem [mailto:Bheem.Kothur@dep.state.fl.us]
Sent: Friday, February 10, 2012 9:15 AM
To: 'Lorna Velardi'
Cc: Tracy DePaola; 'Lauren M. Clark'; Kraemer, Janine; Tripp, Anthony
Subject: RE: AERC

Dear Ms. Lorna:
Let me know when I can except a response to the below approved issues.
Thanks.

Bheem

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. DEP Customer Survey.

From: Kothur, Bheem
Sent: Tuesday, January 31, 2012 8:39 AM
To: 'Lorna Velardi'
Cc: Tracy DePaola; Lauren M. Clark
Subject: RE: AERC

Dear Ms. Lorna:
Looks Good. Please revise the appropriate pages with dates and submit.
Thanks.

Bheem

From: Lorna Velardi [mailto:lmv@envirostrat.com]
Sent: Monday, January 30, 2012 12:59 PM
To: Kothur, Bheem
Cc: Tracy DePaola; Lauren M. Clark
Subject: AERC

Dear Bheem,

Thank you for discussing your comments (January 18, 2012 email) on AERC's revised permit application with myself and Tracy Depaola. Below is the summary of the issues. As discussed, AERC will be further reviewing the issues and will contact you this week about when you can expect a response to these issues. Please do not hesitate to contact myself of Ms. DePaola if you have any questions.

Lorna M. Velardi
President

ENVIRONMENTAL
STRATEGY
CONSULTANTS, INC.

1528 Walnut Street, Suite 1812-1818
Philadelphia, Pa. 19102
215-731-4200
215-789-3832 (direct)
215-740-3132 (mobile)
215-731-4207 (fax)
www.envirostrat.com