

From: Kothur, Bheem

Sent: Tuesday, February 11, 2014 1:49 PM

To: 'John Jones'; Steve Obst

Cc: Tripp, Anthony; Knauss, Elizabeth; Eldredge, Susan F.; Bahr, Tim; Mayberry, Eric

Subject: FW: Raider Environmental Services, Mulberry Facility Permit Modifications; Facility I.D: FLR 000 176 271

John,

I have reviewed your request and have the following comments:

1. This would be a typical minor modification and for a minor modification we normally request a \$250 fee and solid waste permit application.
2. Some other questions that come to mind that you could expand on when you submits the minor mod application would be:
3. Will this increase in volume include any changes in the type or nature of oily solid wastes being received? If so, this should be explained to determine if other changes in testing, handling, storage, or management of the oily solid wastes are needed, along with a revised operation plan.
4. Will the increase be accommodated within the current oily solid waste storage area/secondary containment or will these areas have to be expanded? If so, an updated/revised site plan would be required.
5. This increase would need to be accounted for in the closure cost estimate as well.
6. Submit the revised closure cost estimates with the inflation factor of 1.017 for this year 2014, and include the additional costs for solid waste capacity from "150 drums" to "500 drums".
7. This permit modifications not required Public Notice.

If you have any questions, please let me know.

Sincerely,

Bheem R. Kothur, P.E., DEE

Hazardous Waste Program & Permitting

From: John Jones [<mailto:johnmjonespe@sbcglobal.net>]

Sent: Tuesday, February 11, 2014 9:23 AM

To: Kothur, Bheem

Subject: Mulberry closure cost estimate

Hi, Bheem. Can you send me a copy of the FDEP approved closure cost estimate for Raider's Mulberry facility? If Raider wants to increase the solid waste capacity from 150 drums to 500 drums, what do you need? I understand the closure cost will need to be increased, and the Financial Assurance, but is there a permit mod required?