

## Thursby, Kim

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**From:** Stephen Lefon <slefon@aerc.com>  
**Sent:** Thursday, August 18, 2016 9:08 AM  
**To:** Epost HWRS (Shared Mailbox)  
**Subject:** RE: AERC.com, Inc.; FLD 984 262 782;First Request for Additional Information (RAI)

Received.

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### Stephen Lefon

Director of Sustainability  
AERC Recycling Solutions  
Tel: 973-691-3200 x7650  
Fax: 804-282-3975  
slefon@aerc.com

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**From:** Thursby, Kim [mailto:Kim.Thursby@dep.state.fl.us] **On Behalf Of** Epost HWRS (Shared Mailbox)  
**Sent:** Wednesday, August 17, 2016 9:37 AM  
**To:** Stephen Lefon <slefon@aerc.com>  
**Cc:** Baker, Bryan <Bryan.Baker@dep.state.fl.us>; Mark Larsen <mlarsen@aerc.com>; Teresa Mannerberg <tmannerberg@aerc.com>; White, John <John.White@dep.state.fl.us>; McBride, Ashanti <Ashanti.McBride@dep.state.fl.us>; Cinquino, Dawn <Dawn.Cinquino@dep.state.fl.us>; 'bastek.brian@epa.gov' <bastek.brian@epa.gov>; Kothur, Bheem <Bheem.Kothur@dep.state.fl.us>  
**Subject:** AERC.com, Inc.; FLD 984 262 782;First Request for Additional Information (RAI)

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us). (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at [www.adobe.com/products/acrobat/readstep2.html](http://www.adobe.com/products/acrobat/readstep2.html).

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Bryan Baker, P.G.  
Environmental Administrator

## Hazardous Waste Program & Permitting





# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Jonathan P. Steverson  
Secretary

## REQUEST FOR ADDITIONAL INFORMATION

August 17, 2016

Stephen Lefon, Director of Sustainability  
4317- J Fortune Place, Suite J,  
West Melbourne, Florida 32904-1509  
[slefon@aerc.com](mailto:slefon@aerc.com)

Re: First Request for Additional Information (RAI)  
Brevard County – Hazardous Waste  
Facility Name: AERC.com, Inc.  
Facility ID: FLD 984 262 782  
DEP Application No.: 0072959-HO-006

Dear Mr. Ditter:

Thank you for your application for renewal permit for the above referenced Facility. The Department has assigned DEP Application No. 0072959-HO-006 to the application. A Department staff review of the application and supporting documentation submitted on June 30, 2016, indicates the application is incomplete. Pursuant to the provisions of Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

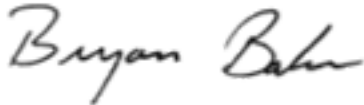
Please submit the response in electronic format to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us) with a copy to [Bheem.kothur@dep.state.fl.us](mailto:Bheem.kothur@dep.state.fl.us). If the file is very large, you may post it to a folder on this

Mr. Stephen Lefon  
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office's ftp site at: <ftp://ftp.dep.state.fl.us/pub/incoming/DWM/>[name of folder]. After posting the document, send an e-mail to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to [Bheem.kothur@dep.state.fl.us](mailto:Bheem.kothur@dep.state.fl.us), alerting us that it has been posted.

If you have any questions, please contact b by telephone at 850-254-8781 or by e-mail at [Bheem.kothur@dep.state.fl.us](mailto:Bheem.kothur@dep.state.fl.us).

Sincerely,



Bryan Baker, P.G.  
Environmental Administrator  
Florida Department of Environmental Protection

cc:

*Mark Larsen, AERC.com, [mlarsen@aerc.com](mailto:mlarsen@aerc.com)*

*Teresa Mannerberg, AERC.com, [tmannerberg@aerc.com](mailto:tmannerberg@aerc.com)*

*John White, Central District, [john.white@dep.state.fl.us](mailto:john.white@dep.state.fl.us)*

*Ashanti McBride, OGC Tallahassee, [Ashanti.mcbride@dep.state.fl.us](mailto:Ashanti.mcbride@dep.state.fl.us)*

*Dawn Cinquino, FDEP Tallahassee, [dawn.cinquino@dep.state.fl.us](mailto:dawn.cinquino@dep.state.fl.us)*

*Brian Bastek, EPA Region 4, [bastek.brian@epa.gov](mailto:bastek.brian@epa.gov)*

Attached: List of Requested Information

### **ATTACHMENT: List of Requested Information**

Facility Name: AERC.com, Inc.  
Facility ID: FLD 984 262 782  
DEP Application No.: 0072959-HO-006

#### **Specific Comments:**

1. Tab 2, Executive Summary, pp. 1 & 2: Please change “FLDEP” to “FDEP” in the third paragraph on page 2 and include this abbreviation on page 1 (2<sup>nd</sup> paragraph) when you first mention the Department.
2. Tab 2, Executive Summary, pg. 1: Please define the abbreviation MCD (mercury-containing device) the first time it is used.
3. Tab 4, Part I, Attachment 1, Item A.21, pg.1: Tim Bahr is no longer the Administrator for Hazardous Waste Regulation. Bryan Baker is the Administrator, Hazardous Waste Program and Permitting at this time. Please also replace Danielle Bentzen with John White, Permitting & Compliance, FDEP - Central District, 407-897-4305. Also, NPDES Storm Water Permit: William B. Hansen is no longer, therefore, replace by: Borja Crane-Amores, and telephone: 850-245-7520; email: [Borja.craneAmores@dep.state.fl.us](mailto:Borja.craneAmores@dep.state.fl.us); The Air Quality General Permit: FDEP Tel: 407-897-2927. Please revise as appropriate.
4. Tab 7, Attachment 4, Item D.2., Brief Description of Facility/Nature of Business, pg. 2: Under D.2.2., *AERC Recycling Solutions Florida Facility – Nature of Business*, the facility is not permitted to receive “other materials such as process and wash waters, debris and lamp powders”. Please revise accordingly throughout the application.
5. Tab 7, Attachment 4, Item D.2, pp 2 and 3; and Executive Summary, pg. 1, para 4: Under *Activities at the facility* on page 2, first bullet point, the application states that AERC also accepts MCDs debris. Please define “MCDs debris”. Also, the application states that “Mercury from other sources (e.g., soils, carbons. contaminated solid materials, etc.) is accepted by the facility for accumulation and shipment off-site to a TSD/reclamation facility.” Please replace “is accepted by the facility for accumulation and shipment off-site to a TSD/reclamation facility” with “is consolidated by the facility for shipment off-site to a TSD/reclamation facility”. Note that this facility is only being permitted to accept mercury containing lamps and devices, not mercury contaminated materials from other sources (e.g., soils, carbons, contaminated solid materials, etc.) for accumulation and shipment off-site. The facility is allowed, through the 10-day transfer facility, to “consolidate” and transport through the facility, items that are manifested to a permitted TSD or

reclamation facility. The facility cannot “accept”, “accumulate”, or “process” these other mercury containing materials; the facility can “consolidate” these shipments in the 10-day facility.

6. Tab 9, Attachment 6, Item D.4, Storage Area Capacity, pg. 1: Maximum Storage Capacity is listed as 1,088 drums; however, Part I of the Application (page 16) lists the drum capacity as 1,632 drums. Please clarify.
7. Tab 9, Attachment 6, Item D.4, Storage Area Capacity, pg. 1: Area Four lists the number of pallets as 18. This number appears to be high considering the length and width of the area (i.e., square footage) and the number of pallets stored in other storage areas. Please clarify and revise the total number of drums and lamps or the square footage of this area.
8. Tab 9, Attachment 6, Item D.4, Storage Area Capacity, pg. 3: Area Fifteen (15) is listed as 32 feet long and 4 feet wide, making it longer than Area Fourteen (14). The figure of the storage areas (Figure D.2.) in Attachment 3, Item B.2. shows Area 14 to be longer than Area 15. Please clarify the dimensions of Storage Area 15 on both this page and Figure D.2.
9. Tab 9, Attachment 6, Item D.4, Storage Area Capacity, pg. 3: Both “HW Storage” and “10-Day” have been left blank. These areas will have finite permitted storage areas. Please estimate those areas and include with this table.
10. Tab 9, Attachment 6, Item D.4, Storage Area Capacity, pg. 3: Please include the following footnote for this table regarding the HW Storage and 10-Day storage areas: “(1) The areas are not directly part of permitted storage areas – the provided storage capacities are either accumulation for Generator wastes or for handling of material associated with 10-day Transfer. As such, these areas are somewhat flexible in size – See Attachment 3 – Item B.2 Facility Features Drawing.”
11. Tab 10, Attachment 7, Item D.5 Operations Plan, pg. 1: Please delete the hard return found in the 4<sup>th</sup> sentence beginning “Fluorescent lamps are transported...”
12. Tab 10, Attachment 7, Item D.5 Operations Plan, pg. 2: Last line on this page states “Lamps are not left outside, unless they are inside closed trailers.” Please explain the procedure by which lamps are stored outside the building inside closed trailers. Under what conditions are the lamps stored outside, how long are they stored there and is the storage in a secured area?
13. Tab 10, Attachment 7, Item D.5 Operations Plan, pg. 3: First line on this page states “Once inside the building, the lamps are placed on the floor with the existing

- inventory. The lamps are stacked no higher than 12 feet.” What is the average height of lamp boxes? Assuming lamp boxes to be 4 feet high, this sentence indicates that 3 boxes/pallets of lamps may be stacked upon each other. Is there a reason why the lamps would be stacked 12-feet high? If so, please explain. If not, what is the expected height?
14. Tab 10, Attachment 7, Item D.5 Operations Plan, Pg.3: The first paragraph on the page states “Sometimes they are removed from the boxes and placed into satellite accumulation lamp racks for subsequent processing”. As there is no “satellite accumulation” provision in the universal waste regulations and certainly not a satellite accumulation provision for removal of waste from storage to satellite accumulation, please clarify this sentence.
  15. Tab 10, Attachment 7, Item D.5 Operations Plan, pg. 4: In the first paragraph under “Air Filtration System” second sentence: Please correct the typographical error by changing measure” to “measured”.
  16. Tab 10, Attachment 7, Item D.5 Operations Plan, pg. 8: Second sentence of the 4<sup>th</sup> paragraph reads “All containers of batteries are weighed, unpacked and sorted by recycling technicians at the Allentown facility. Please correct Allentown to “Melbourne”.
  17. Tab 10, Attachment 7, Item D.5 Operations Plan, pg. 9: Under *Ten-Day Transfer Operations*, please correct the error in first sentence where it reads “...Hazardous waste under it Florida...” To read hazardous wastes under its Florida...”. Also, please the use of the term “organize” in place of “manage” in the following sentence: “This transfer operation is designed to help manage and provide cost effective logistical operations to clients for those wastes generated in the southeastern portion of the United States that ultimately must be shipped to the AERC, PA facility for acceptance and processing.”
  18. Tab 11, Attachment 8, Exhibit D.6, Contingency Plan, pg. 2: Under Item 3.2 Destination facility is the sentence “AERC does not currently operate as a Destination facility ....”. Please correct the sentence to read “AERC currently operate as a Destination facility”.
  19. Tab 11, Attachment 8, Exhibit D.6, Contingency Plan, Attachment 2, pg.18: The telephone number for “Florida Division of Emergency Management” is 800-320-0519.
  20. Tab 11, Attachment 8, Exhibit D.6.2, AERC.com Transportation Contingency Plan, Attachment 2: The reference to the Florida Department of Environmental Protection

Central District Office should be Changed to “Florida Division of Emergency Management. The telephone numbers are correct.

21. Tab 12, Attachment 9, Item D.7. Worker Health & Safety Plan, pg. 2: The Table of Contents does not correlate with the text on page 4 or with the provided sections in this attachment. Please revise accordingly.
22. Tab 13, Attachment 10, Item D.8 Quality Control Plan, Table 2.A, pg. 4: It needs to be made clear in the text that “3. Non-specific mercury bearing wastes, including process and pollution abatement materials” can only be processed if generated by the facility as part of normal operations.
23. Tab 13, Attachment 10, Item D.8 Quality Control Plan, pg. 7: Under 2.C. *Sampling to Determine Effectiveness Grab and Composite Sample Analyses from West Melbourne Facility*, the “general sampling method” described on the page does not indicate the facility has found the need to ensure a homogenous sample of glass in order to obtain consistent results. Please review and revise as appropriate.
24. Tab 13, Attachment 10, Item D.8, Quality Control Plan, Pg. 7: Under “Recovery of processed glass, end-caps, devices and metallic components” the first sentence should read “a separate minimum 8 oz., sample is taken daily from the point of generation for each separate waste stream. In the second sentence, the term “1-gallon” should be replaced with “a weekly sample”.
25. Tab 13, Attachment 10, Item D.8, Quality Control Plan, pg. 8: Under the Item 2.D, QA Plan for Each Category and Process, the “RECYCLING PROCEDURES” do not account for pre-paid boxes of waste lamps received through common carrier. Please identify how these boxes will be inventoried and tracked in your system.
26. Tab 13, Attachment 10, Item D.8 Quality Control Plan, pg. 15: Under *Container Storage Configuration*, the application states that there is a minimum of 18 inches of aisle space. Although the applicable statutes do not define “adequate” aisle space, the Department does not believe 18 inches to be adequate.
27. Tab 13, Attachment 10, Item D.8 Quality Control Plan, pg. 16: Replace the word “appropriate” with the word “adequate” when referring to aisle space in paragraphs 1 and 3.
28. Tab 13, Attachment 10, Item D.8 Quality Control Plan, pg. 18: Under 6. *Air Monitoring (cont.)*, the last line reads “AERC’s plans are to use similar systems for all new mercury processes proposed in this permit.” Please delete this sentence.



29. Tab 14, Attachment 11, Item D.9 Closure Plan: The application submittal includes Cost Estimates for closure but does not provide a narrative that describes how closure will occur. Please provide a closure narrative (i.e., Closure Plan) that correlates with the Cost Estimates provided.
  
30. Tab 14, Attachment 11, Item D.9 Closure Plan: Table D.9-2 Closure Plan Cost Estimate provides cost estimates for management and disposal of several types of materials at the facility along with project support activities and other costs. However, without a further discussion (narrative) or breakdown of these costs, the Department cannot adequately evaluate the costs. For example, sampling and analysis has a unit cost of \$6,100.00 but without more information, the Department cannot determine if that estimate is adequate or not. Further, quantities for several of the categories of materials are provided without an explanation of where those quantities came from. Please resubmit a more detailed cost estimate and plan (Attachment 11) for our review.