

Thursby, Kim

From: Jones, Bryan <bjones@harsco.com>
Sent: Thursday, July 15, 2021 11:59 AM
To: Thursby, Kim; Epost HWRS
Subject: RE: :EXTERNAL: AERC Acquisition Corporation d/b/a AERC Recycling Solutions, A Clean Earth Company; FLD 984 262 782; First Request for Additional Information (RAI)

Received.

Bryan Jones

Area EH&S Manager

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402 Webster Chapel Road, King Of Prussia, PA 35905

From: Thursby, Kim <Kim.Thursby@FloridaDEP.gov>
Sent: Monday, July 12, 2021 8:01 AM
To: Jones, Bryan <bjones@harsco.com>
Cc: Smith, Michell M. <Michell.M.Smith@FloridaDEP.gov>; Walker, Kim (Waste) <Kim.Walker@FloridaDEP.gov>; 'bastek.brian@epa.gov' <bastek.brian@epa.gov>; 'merizalde.carlos@epa.gov' <merizalde.carlos@epa.gov>; Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>; Rothenberger, Miranda <Miranda.Rothenberger@FloridaDEP.gov>; Echevarria, Edgar <Edgar.Echevarria@FloridaDEP.gov>; Horlick, Susan <Susan.Horlick@dep.state.fl.us>; Ashwood, Janet <Janet.Ashwood@FloridaDEP.gov>; Petersen, Dane <Dane.Petersen@FloridaDEP.gov>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Subject: :EXTERNAL: AERC Acquisition Corporation d/b/a AERC Recycling Solutions, A Clean Earth Company; 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 (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.

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.

Michell Mason Smith
Environmental Administrator
Hazardous Waste Program & Permitting



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FLORIDA DEPARTMENT OF Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, FL 32399

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Interim Secretary

REQUEST FOR ADDITIONAL INFORMATION

July 12, 2021

Bryan Jones. Area EH&S Manager
AERC Acquisition Corporation d/b/a AERC Recycling Solutions, A Clean Earth Company
4317 – J Fortune Place
West Melbourne, Florida 32904
bjones@harsco.com

Re: First Request for Additional Information (RAI)
Brevard County – Hazardous Waste
Facility Name: AERC Acquisition Corporation d/b/a AERC Recycling Solutions, A
Clean Earth Company
Facility ID: FLD 984 262 782
DEP Application No.: 0072959-008-HO

Dear Mr. Jones:

Thank you for your application for operation a Mercury Recovery and Recycling Facility for the above referenced Facility. The Department has assigned DEP Application No. 0072959-008-HO to the application. A Department staff review of the application and supporting documentation submitted on July 1, 2021, indicates the application is incomplete. It must follow the provisions of Rule 62-730.220 F.A.C. Rule 62-730.220(6), and Rule 62-737.900(2), F.A.C. Please provide the information in the attached document and refer to this correspondence in your response.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive responses to the Department comments within 30 days of the date of this letter, (by August 12, 2021), 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, with a copy to

www.dep.state.fl.us

Mr. Bryan Jones, Area EH&S Manager

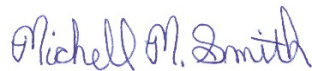
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bheem.kothur@floridadep.gov. If the file is very large, you may post it to a folder on this office's ftp site at: <ftp://ftp.dep.state.fl.us/pub/incoming/DWM>. After posting the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to bheem.kothur@floridadep.gov, alerting us that it has been posted.

If you have any questions, please contact Bheem Kothur, P.E., by telephone at 850-245-8781 or by e-mail at bheem.kothur@floridadep.gov.

Sincerely,



Michell M. Smith
Environmental Administrator
Hazardous Waste Program and Permitting
Florida Department of Environmental Protection

MS/bk

cc:

Brian Bastek, USEPA Region 4 – bastek.brian@epa.gov

Carlos Merizalde, EPA Region 4 – merizalde.carlos@epa.gov

Michael Eckoff, FDEP Central District, michael.eckoff@floridadep.gov

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Janet Ashwood, FDEP Tallahassee, janet.ashwood@floridadep.gov

Dane Petersen, OGC, Tallahassee, dane.petersen@floridadep.gov

Mr. Bryan Jones, Area EH&S Manager

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Attachment: List of Requested Information

Facility Name: AERC Acquisition Corporation d/b/a AERC Recycling Solutions, A Clean Earth Company

Facility ID: FL0 000 207 449

DEP Application No.: 0072959-008-HO

1. **General Comment:** The permit renewal number noted in the application is noted as 0072959-HO-006; the permit application number should be stated as 0072959-007-HO. Please review and revise as appropriate through the application.
2. Please submit facility updated Form 8700-12FL, as appropriate.
3. Please identify all maps names and map number: For Example, you have identified only Attachment 2-Item B.1.1. The remaining of two (2), maps and names are not identified. Please review and revise as appropriate.
4. Permit Application, Part 1, Item 18, Site Ownership Status and Page 11: Presently leased; the expiration date of the lease is September 2021. Upon lease renewal, please update the application as appropriate and submit to the department.
5. Facility Plot Plan, and Contingency Plan, Attachment 6-Evacuation Floor Plan, Page 25 of 26: Please review these two (2) maps and be consistent. For example: In one (1) map showing S-1, L1 and in another map, it is not identified.
6. Contingency Plan, Attachment – 6, Page Numbers: It appears that this attachment numbered twice. In the top showing 1 of 30 and in the bottom of page showing 1 of 26. Please review, revise as appropriate.
7. Contingency Plan, Attachment- 2, Emergency Notification Coordinator List, Page 15 of 30: Please add Florida Division of Emergency Management, Telephone Number; 1-800-320-0519.
8. Please correct your Job Title throughout the documents: You have used “Area EHS Manager” and also as “Area EH&S Manager”. Please review, revise and be consistent.
9. Facility Plot Plan: The facility must provide the Site Plan, Attachment 3, Item B.2 with 8.5”X11” in pdf document, so that it can be easily inserted into the renewal permit.
10. Please indicate in your cover letter by saying that there are no other changes in this renewal application in addition to those in the previous renewal application dated June 30, 2016 and the permit transfer application dated April 14, 2017.
11. Facility or Company name: Please review all permit renewal related documents and be consistent.