

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION III**

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

VIA ELECTRONIC MAIL

Mark Kasper **Chief Operations Officer AERC** Acquisition Corporation dba AERC Recycling Solutions, A Clean Earth Company 2591 Mitchell Avenue Allentown, PA 18103 mkasper@harsco.com

Cheryl Coffee, Director of Environmental & Compliance and Shannon Crawford, Area Environmental Manager **AERC** Acquisition Corporation dba AERC Recycling Solutions, A Clean Earth Company 334 South Warminster Road Hatboro, PA 19040 ccoffee@harsco.com scrawford@harsco.com

Re: **AERC Acquisition Corp, DBA AERC Recycling Solutions,** A Clean Earth Company - Docket No. RCRA-03-2020-0070 **Completion of Supplemental Environmental Project**

Dear Mr. Kasper, Ms. Coffee and Ms. Crawford:

The U.S. Environmental Protection Agency, Region III ("EPA") has reviewed the Supplemental Environmental Project ("SEP") Completion Reports submitted by AERC Acquisition Corp, DBA AERC Recycling Solutions, A Clean Earth Company ("AERC"), dated October 28, 2020 and December 4, 2020. AERC performed this SEP as part of a settlement reached between AERC and EPA, in the above captioned matter. This settlement was memorialized in a Consent Agreement and Final Order ("CAFO"), filed February 25, 2020.

The SEP Completion Reports detail the hosting of two collection events, in which electronic waste and other household hazardous waste was collected from residents, at no cost to the public, for purposes of recycling and proper disposal, as described in Paragraph 67 of the CAFO. AERC reported that hosting these two events, and the subsequent processing and disposal of the waste, cost a total of \$46,218.36, which exceeds the \$40,000 required by Paragraph 67 of the CAFO. The two events collected a total of 23,471 pounds of universal and electronic waste, and 20 drums of latex paint, which were diverted from the municipal waste stream and redirected for recycling and appropriate disposal.

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I understand that completion of the project was delayed due to the COVID-19 pandemic. During the period of the delay, AERC kept EPA informed by submitting periodic SEP status reports and arranging phone calls with EPA staff. On behalf of EPA, I appreciate the persistence of the AERC staff in completing this SEP.

Based upon the SEP Completion Reports and their attachments, EPA has determined that AERC has completed the SEP in accordance with the requirements of the CAFO. Accordingly, this letter satisfies the requirements of Paragraph 71.b. of the CAFO. If you have any questions regarding this matter, feel free to contact Natalie Katz, Senior Assistant Regional Counsel, at (215) 814-2615.

Sincerely,

Karen Melvin, Director Enforcement & Compliance Assurance Division

cc: Rebecca Serfass (3ED22) (serfass.rebecca@epa.gov)
Natalie Katz (3RC40) (katz.natalie@epa.gov)
Regional Hearing Clerk (R3 Hearing Clerk@epa.gov)