

GREEN RECOVERY TECHNOLOGIES, LLC
PUBLIC HEARING
June 17, 2015

LIST OF EXHIBITS

- Exhibit 1 Application for a Coastal Zone Act Permit, dated February 10, 2015 and received on February 13, 2015

- Exhibit 2 Affidavit of Publication announcing the receipt and availability of the Coastal Zone Act Permit application, News Journal, dated February 25, 2015

- Exhibit 3 Affidavit of Publication announcing the receipt and availability of the Coastal Zone Act Permit application, New Castle Weekly, dated February 25, 2015

- Exhibit 4 E-mail with attachment from Kevin Coyle, DNREC, to Kenneth Laubsch, Green Recovery Technologies, dated March 30, 2015, requesting additional information

- Exhibit 5 E-mail with attachment from Stephanie Hansen, Young Conaway Stargatt and Taylor, representing Green Recovery Technologies, to Kevin Coyle, DNREC, dated April 20, 2015, providing additional information as requested in the March 30, 2015 letter

- Exhibit 6 E-mail with attachment from Carol Garza, Legal Administrative Assistant for Stephanie Hansen, Young Conaway Stargatt and Taylor, representing Green Recovery Technologies, to Kevin Coyle, DNREC, dated May 11, 2015, providing a revised Table 6.1, Air Quality, and a revised Attachment 13, Coastal Zone Environmental Impact Offset Matrix

- Exhibit 7 Secretary's Environmental Assessment Report, dated May 2015, and signed on May 19, 2015

- Exhibit 8 E-mail from Joanna French, Division of Air Quality, to Kevin Coyle, DNREC, dated May 21, 2015, requesting revisions to Table 6.1, Air Quality, and manufacturer's information for the particulate filter

- Exhibit 9 E-mail with attachment from Stephanie Hansen, Young Conaway Stargatt and Taylor, representing Green Recovery Technologies, to Joanna French, Division of Air Quality, dated May 22, 2015, providing a revised Table 6.1, Air Quality, and manufacturer's information for the particulate filter

Exhibit 10 Affidavit of Publication announcing the public hearing and the availability of the Coastal Zone Act Permit application, News Journal, dated May 24, 2015

Exhibit 11 Affidavit of Publication announcing the public hearing and the availability of the Coastal Zone Act Permit application, New Castle Weekly, dated May 28, 2015



The News Journal
Media Group

A GANNETT COMPANY

Street Address: (302) 324-2500
950 West Basin Road (800) 235-9100
New Castle, DE 19720

Mailing Address: Legal Desk:
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Wilmington, DE 19850 Legal Fax:
302 324-2249

DNREC COASTAL ZONE
ATTN: KEVIN COYLE
89 KINGS HWY
DOVER, DE 19901

AFFIDAVIT OF PUBLICATION

State of Delaware
New Castle County

Personally appeared **The News Journal**

Of the **The News Journal Media Group**, a newspaper printed, published and circulated in the State of Delaware, who being duly sworn, deposeth and saith that the advertisement of which the annexed is a true copy, has been published in the said newspaper 1 times, once in each issue as follows:

02/25/15 A.D 2015



Ad Number: 0000320443


Sworn and subscribed before me, this 25 day of
February, 2015



Legal notification printed at larger size for affidavit.

Ad Number: 0000320443

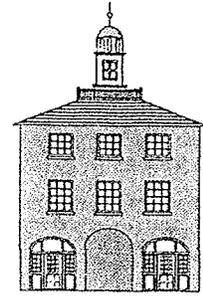
Run Dates: 02/25/15

**LEGAL NOTICE**DNREC, Office of the Secretary
February 25, 2015Coastal Zone Act Permit Application
Re: Green Recovery Technologies, LLC

The Department of Natural Resources and Environmental Control (DNREC) has received an application for a Coastal Zone Act Permit from Green Recovery Technologies, LLC ("GRT"). GRT is seeking a permit to construct and operate a facility at 42 Lukens Drive in the Riveredge Industrial Park, New Castle, that chemically separates high quality proteins and fats from a poultry fines feedstock into high quality feed ingredients for animal nutrition markets. Environmental impacts to air quality are anticipated. The applicant has obtained 7 tons of NOx Ozone Season credits from the Delaware Economic Development Office as their offset.

The application is presently available for inspection at <http://www.dnrec.delaware.gov/Admin/CZA/Pages/default.aspx>.

If and when this application is deemed to be preliminarily, administratively complete and ready for a public hearing, there will be a second legal notice announcing the hearing arrangements.
2/25-NJ



New Castle Weekly

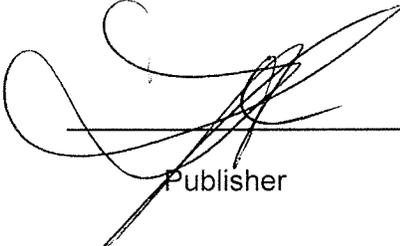
203 Delaware Street, New Castle, DE 19720-4815

302-328-6005

AFFIDAVIT OF PUBLICATION

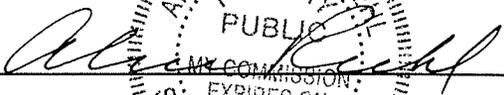
STATE OF DELAWARE
COUNTY OF NEW CASTLE

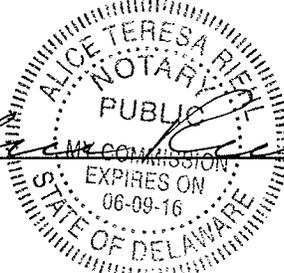
Personally appeared before me this 25th day of February, 2015, Theresa Gormley of the **New Castle Weekly**, a weekly newspaper published in the City of New Castle, County of New Castle, State of Delaware, who being duly sworn, states that the attached Notice of Coastal Zone Act Permit Application was published in the **New Castle Weekly** on 2/25/2015.



Publisher

Sworn to me this 25th day of February, 2015





LEGAL NOTICE
DNREC, Office of the Secretary
February 25, 2015

Coastal Zone Act Permit Application
Re: Green Recovery Technologies, LLC

The Department of Natural Resources and Environmental Control (DNREC) has received an application for a Coastal Zone Act Permit from Green Recovery Technologies, LLC ("GRT"). GRT is seeking a permit to construct and operate a facility at 42 Lukens Drive in the Riveredge Industrial Park, New Castle, that chemically separates high quality proteins and fats from a poultry fines feedstock into high quality feed ingredients for animal nutrition markets. Environmental impacts to air quality are anticipated. The applicant has obtained 7 tons of NO_x Ozone Season credits from the Delaware Economic Development Office as their offset.

The application is presently available for inspection at <http://www.dnrec.delaware.gov/Admin/CZA/Pages/default.aspx>.

If and when this application is deemed to be preliminarily, administratively complete and ready for a public hearing, there will be a second legal notice announcing the hearing arrangements.

Coyle, Kevin F. (DNREC)

From: Coyle, Kevin F. (DNREC)
Sent: Monday, March 30, 2015 9:33 AM
To: Ken (klaubsch@greenrecoverytech.com)
Cc: shansen@ycst.com; Cherry, Philip J. (DNREC)
Subject: GRT CZA Permit Application Request for Additional Information

Ken – Please see the attached letter requesting additional information; a hard copy will be sent in the mail. Please let me know if you have any questions. Thanks.

Kevin F. Coyle, AICP CEP
Principal Planner

 DNREC, Division of Energy and Climate
1203 College Park Drive, Suite 101
Dover, DE 19904
 302.739.9071
 302.739.1840
 Kevin.Coyle@state.de.us





STATE OF DELAWARE
DIVISION OF ENERGY & CLIMATE
1203 COLLEGE PARK DRIVE, SUITE 101
DOVER, DELAWARE 19904

Office of the Secretary
David S. Small

Phone: (302) 735-3480
Fax: (302) 739-1840

March 30, 2015

Mr. Kenneth Laubsch
President, Green Recovery Technologies, LLC
42 Lukens Drive, Suite 100
New Castle, DE 19720

Dear Mr. Laubsch:

Following the dissemination of GRT's Coastal Zone Act Permit Application throughout the Department for review, a number of questions were raised. In order for the application to be declared preliminarily administratively complete, we will need you to address the following:

1. On page 6, Part 3, Project Summary, the application states that poultry fines feedstock is purchased from a third party vendor. The Material Data Safety Sheet (MSDS) for Poultry Fines Feedstock, submitted as an attachment to the application, states that Green Recovery Technologies, LLC is the manufacturer. Please explain this discrepancy.
2. GRT submitted Air Contaminant Equipment Registration Forms for laboratory fume hood, process room containing Dimethyl Ether (DME), and a dust collector as attachments to a letter from Stephanie Hansen to Phaniel Bediako, dated January 21, 2015. With respect to the dust collector, there are to be 9.1 lbs./day of protein powder (particulate matter) emissions, yet particulate matter emissions are not addressed in the table on page 15, Part 6A, Environmental Impacts, Air Quality.
3. Similarly, with respect to the process room, there are to be 9 lbs./day of DME emissions. DME emissions are not addressed in the table on page 15, Part 6A, Environmental Impacts, Air Quality.

Delaware's Good Nature depends on you!

Mr. Kenneth Laubsch

March 27, 2015

Page 2

We are going to require an amended Project Emissions Table on page 15 to account for emissions of particulate matter and DME. Furthermore, we are going to reexamine the offset proposal to ensure that it accounts for these additional emissions.

You can anticipate a call from the Division of Air Quality Engineering and Compliance Branch to set up a meeting to discuss issues related to air emission calculations and offsets; the CZA Program will also be in attendance.

If you have any questions, please contact me at 302-739-9071 or Kevin.Coyle@state.de.us.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Coyle', with a stylized flourish at the end.

Kevin F. Coyle, AICP CEP

Principal Planner

cc: Stephanie L. Hansen, Esq.

Coyle, Kevin F. (DNREC)

From: Hansen, Stephanie <shansen@ycst.com>
Sent: Monday, April 20, 2015 1:34 PM
To: Coyle, Kevin F. (DNREC)
Cc: French, Joanna (DNREC); klaubsch@greenrecoverytech.com
Subject: GRT - LTR to K. Coyle (CZA).PDF
Attachments: GRT - LTR to K. Coyle (CZA).pdf

Kevin: Please find attached a letter on behalf of GRT responding to your letter of March 30th.

Stephanie L. Hansen
Counsel
Young Conaway Stargatt & Taylor, LLP
Rodney Square
1000 North King Street
Wilmington, DE 19801
P 302.571.6733
F 302.576.3519
shansen@ycst.com

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**YOUNG CONAWAY
STARGATT & TAYLOR, LLP**

Attorneys at Law

WILMINGTON
BOULEVARD

NEW YORK
OFFICE

Stephanie L. Hansen
P 302.571.6733
F 302.576.3519
shansen@ycst.com

April 20, 2015

VIA EMAIL and FIRST CLASS U.S. POSTAL SERVICE

Kevin Coyle, Principal Planner
DNREC - Div. of Energy & Climate
1203 College Park Drive, Suite 101
Dover, DE 19904

Re: Green Recovery Technologies, LLC - CZA Permit Application

Dear Mr. Coyle:

This letter is in response to your letter to Kenneth Laubsch, dated March 30, 2015, requesting certain information in order for the Coastal Zone Act Permit Application sent by Green Recovery Technologies, LLC ("GRT") to be declared administratively complete. Your correspondence mentioned three issues and each of those issues along with GRT's response is set forth below:

1. DNREC Question: On page 6, Part 3, Project Summary, the application states that poultry fines feedstock is purchased from a third party vendor. The Material Safety Data Sheet (MSDS) for Poultry Fines Feedstock, submitted as an attachment to the application, states that Green Recovery Technologies, LLC is the manufacturer. Please explain this discrepancy.

GRT Response: GRT's feedstock is being supplied by Valley Proteins, Inc. ("Valley Proteins"). The reason that GRT is listed as the manufacturer is because GRT prepared the MSDS sheet after its independent analysis of the material supplied Valley Proteins. Valley Proteins has its own MSDS sheet for this feedstock material which it produces at its facility in North Carolina (attached hereto). However, the Valley Proteins MSDS sheet applies to poultry fines with a wider percentage range of fats, protein, and moisture than Valley Proteins is under contract to supply to GRT for GRT's use at its facility. In order to be more precise, GRT included its own MSDS sheet of the Valley Proteins feedstock material in the application. The terms "poultry fines," "poultry meal," and "poultry by-products" are synonymous on the MSDS sheets of Valley Proteins and GRT, and all refer to the material being supplied to GRT from Valley Proteins.

YOUNG CONAWAY STARGATT & TAYLOR, LLP
Kevin Coyle, Principal Planner
April 20, 2015
Page 2

2. DNREC Question: GRT submitted Air Contaminant Equipment Registration Forms for laboratory fume hood, process room containing Dimethyl Ether (DME), and a dust collector as attachments to a letter from Stephanie Hansen to Phaniel Bediako, dated January 21, 2015. With respect to the dust collector, there are to be 9.1 lbs/day of protein powder (particulate matter) emissions, yet particulate matter emissions are not addressed in the table on page 15, Part 6A, Environmental Impacts, Air Quality.

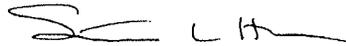
GRT Response: GRT specifically listed on the registration form for the dust collector that the dust collector was equipped with an air contaminant control device, and therefore does not expect to have any emissions of protein powder. Also, the dust collector acts as a negative pressure device specifically designed to collect any particulates and keep them within the system. As a result, since there should be no emissions of particulate matter, GRT felt that listing the emissions of 9.1 lbs/day on the table was neither accurate nor necessary.

3. DNREC Question: Similarly, with respect to the process room, there are to be 9 lbs/day of DME emissions. DME emissions are not addressed in the table on page 15, Part 6A, Environmental Impacts, Air Quality.

GRT Response: GRT specifically listed on the registration form for the process room that only during maintenance events does GRT anticipate any DME emissions, and the limit of any DME emission was listed as 9 lbs/day. GRT anticipates a single, annual maintenance event for the process room. As a result, GRT did not believe that listing the emissions of 9 lbs/day on the table would be accurate or necessary.

As you know, GRT will be meeting with members of the Division of Air Quality tomorrow, April 21st, to discuss items #2 and #3 above, and we will keep you informed as to the outcome of that discussion.

Sincerely,



Stephanie L. Hansen

SLH:slh

Attachments

cc: Ken Laubsch, Green Recovery Technologies, LLC
Joanne French, DNREC – Division of Air Quality

M S D S MATERIAL SAFETY DATA SHEET

VALLEY PROTEINS, LLC
CORPORATE OFFICE
161 VALPRO DRIVE
WINCHESTER, VA 22603
640-577-2590

("ESSENTIALLY SIMILAR" TO OSHA FORM - 20)

DATE 1/1/2008

24 HOUR EMERGENCY INFORMATION - EMERGENCY TELEPHONE NUMBER (540) 877-2590

HAZARD CODES:	FIRE =1	0=LEAST
	REACTIVITY =0	1=SLIGHT
	HEALTH =0	2=MODERATE
	OTHER =0	3=HIGH
		4=EXTREME

SECTION 1 MATERIAL IDENTIFICATION

PRODUCT NAME:	POULTRY MEAL
CAS NUMBER:	68820-45-6
CHEMICAL NAME/SYNONYMS:	POULTRY BY-PRODUCT MEAL
CHEMICAL FAMILY:	
FORMULA:	PROTEINS, FATS & WATER

SECTION 2 HAZARDOUS INGREDIENTS

THIS PRODUCT CONTAINS NO HAZARDOUS INGREDIENTS

SECTION 3 PHYSICAL DATA

BOILING POINT:	DECOMPOSES
VAPOR PRESSURE:	NOT APPLICABLE
VAPOR DENSITY:	NOT APPLICABLE
SPECIFIC GRAVITY:	35 LBS PER CUBIC FT
PERCENT VOLATILE BY VOLUME:	0
EVAPORATION RATE:	0
SOLUBILITY IN WATER:	INSOLUBLE
APPEARANCE AND ODOR:	PALE SOLID POWDER

SECTION 4 FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (METHOD USED):	585 DEGREES FAHRENHEIT (COC)
FLAMMABLE LIMITS (LEL & UEL):	NOT DETERMINED
EXTINGUISHING MEDIA:	CO2; FOAM; DRY POWDER, STEAM
SPECIAL FIRE FIGHTING PROCEDURES:	NONE
UNUSUAL FIRE AND EXPLOSION HAZARDS:	NONE

SECTION 5 HEALTH HAZARDS DATA

THRESHOLD LIMIT VALUE:	NOT DETERMINED
EFFECTS OF OVEREXPOSURE:	MODERATE SKIN IRRITATION
EMERGENCY FIRST AID PROCEDURES:	
SKIN CONTACT:	WASH AFFECTED AREA WITH SOAP AND WATER
EYE CONTACT:	FLUSH THOROUGHLY WITH WATER
INGESTION:	SEEK MEDICAL ATTENTION IMMEDIATELY

SECTION 6 REACTIVITY DATA

STABILITY:	STABLE
CONDITIONS TO AVOID:	DO NOT STORE NEAR OPEN FLAME OR EXCESSIVE HEAT
INCOMPATIBILITY (MATERIALS TO AVOID):	NONE
HAZARDOUS DECOMPOSITION PRODUCTS:	NONE
HAZARDOUS POLYMERIZATION:	WILL NOT OCCUR
CONDITIONS TO AVOID:	KEEP FROM STRONG OXIDIZERS

SECTION 7 SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:
-SWEEP UP AND WASH DOWN AFFECTED AREA

WASTE DISPOSAL METHODS:
-CONSULT LOCAL ORDINANCES

SECTION 8 SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (SPECIFY TYPE):	NONE
VENTILATION:	NONE
LOCAL EXHAUST:	IF NEEDED TO CONTROL ODOR
MECHANICAL:	IF NEEDED FOR COMFORT
SPECIAL:	NONE
OTHER:	NONE
PROTECTIVE GLOVES:	RUBBER, LATEX, VINYL GLOVES
EYE PROTECTION:	SAFETY GLASSES OR GOGGLES
OTHER PROTECTIVE EQUIPMENT:	NONE

SECTION 9 SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:
-AVOID EYE & SKIN CONTACT
-TAKE NORMAL SAFETY PRECAUTIONS WHEN HANDLING

Coyle, Kevin F. (DNREC)

From: Garza, Carol <CGarza@ycst.com>
Sent: Monday, May 11, 2015 3:50 PM
To: Coyle, Kevin F. (DNREC)
Cc: klaubsch@greenrecoverytech.com; French, Joanna (DNREC); Hansen, Stephanie
Subject: Green Recovery Technologies - letter and Tables
Attachments: GRT - letter to K. Coyle.pdf

Attached please find a letter and tables from Stephanie Hansen, Esquire. If you should have any questions, please contact Stephanie directly. Thank you.

Carol L. Garza
Legal Administrative Assistant for Stephanie L. Hansen, Esquire
Young Conaway Stargatt & Taylor, LLP
Rodney Square
1000 North King Street
Wilmington, DE 19801
P 302.571.5022
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CGarza@ycst.com

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Attorneys at Law

Stephanie L. Hansen
P 302.571.6733
F 302.576.3519
shansen@ycst.com

May 11, 2015

VIA EMAIL and FIRST CLASS U.S. POSTAL SERVICE

Kevin Coyle, Principal Planner
DNREC - Div. of Energy & Climate
1203 College Park Drive, Suite 101
Dover, DE 19904

Re: Green Recovery Technologies, LLC – Revisions to CZA Permit Application

Dear Mr. Coyle:

Green Recovery Technologies, LLC (“GRT”) recently met with members of the DNREC Division of Air Quality (“DAQ”) to address the issues raised in your letter to GRT of March 30, 2015. As a result of that meeting, GRT was asked to submit an application package to DAQ to permit the facility as a natural minor source. That application package has now been submitted to DAQ. You mentioned in your letter that you believed the changes that would be required by DAQ would necessitate changes in the project emission table on page 15 of the CZA Permit Application (“Table 6.1”), and we agree.

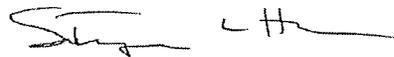
Attached please find the revised Table 6.1. Also, because the information on Table 6.1 is actually a compilation of the information from Attachment 13 in the CZA Permit Application, attached is a revised Attachment 13. Note that Table 6.1 will now take into account particulate emissions from the poultry protein powder, DME emissions, and emissions from the fume hood. To the extent that the CZA Permit Application states that only boiler emissions will be present, this letter revises that statement to make it clear that emissions from this facility will include boiler emissions, particulate emissions from the dust collector, and minor emissions of volatile organic compounds from the dust collector and fume hood. Regarding pollution control measures related to the fume hood and the dust collector, GRT’s laboratory fume hood will be used to conduct research and development and product quality experimentation only on an intermittent basis. As mentioned in other documents previously sent to DAQ, the filter in the dust collector traps particulates greater than 5 microns in size, which represents an efficiency of 99.97%.

YOUNG CONAWAY STARGATT & TAYLOR, LLP
Kevin Coyle, Principal Planner
May 11, 2015
Page 2

We understand from our conversation with your office this morning that additional offset credits are necessary. As a result, we are now in discussions with DEDO to obtain the additional credits and will keep you informed.

Lastly, we discovered an error in the CZA Permit Application under the Inputs section of Part 3 (Project Summary). Specifically, this section states that the facility is sized to intake 4200 pounds per hour of poultry fines. GRT will be processing only 4000 pounds per hour of poultry fines.

Sincerely,



Stephanie L. Hansen

SLH:slh

Attachments

cc: Ken Laubsch, Green Recovery Technologies, LLC
Joanne French, DNREC – Division of Air Quality

PART 6A (Revised Table)

ENVIRONMENTAL IMPACTS

Air Quality

- 6.1 Describe project emissions (new, as well as any increase or decrease over current emissions) by type and amount under maximum operating conditions:

Pollutant	Existing Emissions		Net Increase/Decrease		New Total Emissions		Percent Change (compare tons/year)
	Lbs./day	Tons/year	Lbs./day	Tons/year	Lbs./day	Tons/year	
NOx	0	0	29.89	4.53	29.89	4.53	100%
CO	0	0	13.17	2.00	13.17	2.00	100%
CO2	0	0	18,903.52	2,863.88	18,903.52	2,863.88	100%
Lead	0	0	0	0	0	0	0%
N2O	0	0	0.32	0.05	0.32	0.05	100%
SO2	0	0	0.16	0.02	0.16	0.02	100%
TOC	0	0	9.07	1.64	9.07	1.64	100%
Methane	0	0	0.32	0.05	0.32	0.05	100%
VOC	0	0	4.80	0.73	4.80	0.73	100%

COASTAL ZONE ENVIRONMENTAL IMPACT OFFSET MATRIX

Applicant: Green Recovery Technologies, LLC
 Project: 41 Lakewood Drive, New Castle DE
 CZA Offset Review Reference: (DVRREC 0-6)

Attachment 13

Page 1 of 5
 Application Date: January 16, 2015
 Amendment: Rev 0
 Offset Review Date: (DVRREC Use Only)
 Matrix Approved: N/A

ENVIRONMENTAL IMPACTS	(Applicant's Use) DESCRIBE ENVIRONMENTAL IMPACTS	PAGE NO.	(Applicant's Use) DESCRIBE ENVIRONMENTAL OFFSET PROPOSAL ¹	PAGE NO.	state the offset SUFFICIENCY Yes, No or N/A
Air Quality (Applicant to List Below by Parameter)				Attachment 14	
NO _x	9,056 lbs. emitted annually from boiler operation	2	7 tons of excess seasonal NO _x provided by DFD0 as an offset clearly and demonstrably offset emissions from the small boiler. This also provides a ratio of 1:1 which is consistent with previous general state regulations. When the system is properly installed, it will provide additional benefits by diverting waste material into a viable fuel source.	Attachment 14	
CO	3,993 lbs. emitted annually from boiler operation	2		Attachment 14	
CO ₂	5,327,767 lbs. emitted annually from boiler operation	2		Attachment 14	
H ₂ O	97 lbs. emitted annually from boiler operation	2		Attachment 14	
SO ₂	49 lbs. emitted annually from boiler operation	2		Attachment 14	
TOC	336 lbs. emitted annually from boiler operation, 2,749 lbs. particulate matter emitted annually from dust collector operation	2 & 3		Attachment 14	
Mercury	97 lbs. emitted annually from boiler operation	2		Attachment 14	
VOC	243 lbs. emitted annually from boiler operation, 211 lbs. emitted annually from dust collector operation, 1,000 lbs. emitted annually from lab fume hood	2, 3, 4		Attachment 14	
Water Quality	No water quality impacts are expected				
Surface					
Groundwater					
Water Quantity	No water quantity impacts expected				
Surface					
Groundwater					
Water Use For:	(normal volumes)				
Processing					
Cooling					
Effluent Removal					
Solid Waste	Office waste/administrative wastes of 5,635 lbs./year	2	Office waste recycling program	NA	
Hazardous Waste	No hazardous waste impacts expected				
Habitat	No habitat impact expected - will use existing industrial area footprint				
Wetlands					
Flora Fauna					
Drainage/Flood Control	No change in drainage/flood control				
Erosion ²	No change in erosion				
Land Use Effects	No change in land use				
Glare					
Heat					
Noise					
Odors					
Vibrations					
Radiation					
Electro-Magnetic Interference					
Other Effects					
Threatened & Endangered Species	No threat to any endangered/threatened species				
Impacts From:	No impact from production - raw material through final product				
Raw Material					
Intermediate Products					
By-Products					
Final Products					

COASTAL ZONE ENVIRONMENTAL IMPACT OFFSET MATRIX - BOILER, DUST COLLECTOR, LAB FUME HOOD AND SOLID WASTE IMPACT SUMMARY

Applicant: Green Recovery Technologies, LLC

Page 2 of 5

Project: 42 Lukens Drive, New Castle DE

Attachment 13

Application Date: January 13, 2015

CZA Offset Review Reference: (DNREC Only)

Amendments: Rev 0

Offset Review Date: (DNREC Use Only)

Matrix Amended: N/A

Emission Type	Emission Quantity*		Boiler MMBTU	Annual Hours	Annual lbs.
	lb/106 SCF	lb/MM BTU			
NOx	190	0.186	6.695	7,272	9,056
CO	84	0.082	6.695	7,272	3,992
CO ₂	120,000	117.647	6.695	7,272	5,727,767
Lead	0.0005	0	6.695	7,272	0
N ₂ O	2.2	0.002	6.695	7,272	97
SO ₂	0.6	0.001	6.695	7,272	49
TOC	11	0.011	6.695	7,272	536
Methane	2.3	0.002	6.695	7,272	97
VOC	5.5	0.005	6.695	7,272	243

* Note: emission quantities projected using data from www.epa.gov/ttn/chie1/ap42/ch01/final/c01s04.pdf

COASTAL ZONE ENVIRONMENTAL IMPACT OFFSET MATRIX - BOILER, DUST COLLECTOR, LAB FUME HOOD AND SOLID WASTE IMPACT SUMMARY

Applicant: Green Recovery Technologies, LLC

Page 3 of 5

Project: 42 Lukens Drive, New Castle DE

Attachment 13

Application Date: January 13, 2015

CZA Offset Review Reference: (DNREC Only)

Amendments: Rev 0

Offset Review Date: (DNREC Use Only)

Matrix Amended: N/A

Emission Type	Emission Quantity		Dust Collector lb./Day	Annual Hours	Annual lbs.
	lb./day	lb./day			
NOx	0	0	0	0	0
CO	0	0	0	0	0
CO ₂	0	0	0	0	0
Lead	0	0	0	0	0
N ₂ O	0	0	0	0	0
SO ₂	0	0	0	0	0
TOC	0	9.072	9.072	7,272	2,749
Methane	0	0	0	0	0
VOC	0	0.69552	0.69552	7,272	210.7

COASTAL ZONE ENVIRONMENTAL IMPACT OFFSET MATRIX - BOILER, DUST COLLECTOR, LAB FUME HOOD AND SOLID WASTE IMPACT SUMMARY

Applicant: Green Recovery Technologies, I.I.C

Page 4 of 5

Project: 42 Lukens Drive, New Castle DE

Attachment 13

Application Date: January 13, 2015

CZA Offset Review Reference: (DNREC Only)

Amendments: Rev 0

Offset Review Date: (DNREC Use Only)

Matrix Amended: N/A

Emission Type	Emission Quantity		Lab Fume Hood	Annual Hours	Annual lbs.
	lb./day	lb./day	lb./Day		
NOx	0	0	0	0	0.0
CO	0	0	0	0	0.0
CO ₂	0	0	0	0	0.0
Lead	0	0	0	0	0.0
N ₂ O	0	0	0	0	0.0
SO ₂	0	0	0	0	0.0
TOC	0	0	0	0	0.0
Methane	0	0	0	0.0	0.0
VOC	0	5	5	200	1,000.0

COASTAL ZONE ENVIRONMENTAL IMPACT OFFSET MATRIX - OFFICE WASTE DIVERSION ANALYSIS

Applicant: Green Recovery Technologies, LLC

Page 5 of 5

Project: 42 Lukens Drive, New Castle DE

Attachment 13

Application Date: January 13, 2015

CZA Offset Review Reference: (DNREC Only)

Amendments: Rev 0

Offset Review Date: (DNREC Use Only)

Matrix Amended: N/A

Emission Type	lbs./office employee**	employees	Daily Rate (lbs.)	Annual Office Workdays	Annual lbs.
Office Solid Waste	1.5	15	22.5	250	5,625

** Note: daily waste quantities projected using data from www.dnrec.state.de.us/del-offc.htm

**SECRETARY'S ENVIRONMENTAL ASSESSMENT REPORT
FOR A COASTAL ZONE ACT PERMIT APPLICATION**

Re: Green Recovery Technologies, LLC

May 2015

Introduction

As required by the "Regulations Governing Delaware's Coastal Zone" (Section 8.3.4) dated May 11, 1999, and amended October 1, 2001, the Secretary is required to make an environmental assessment of the impact(s) of the project on the Coastal Zone of Delaware. This is done by evaluating the project's likely impact on the statutory and regulatory criteria and making a preliminary determination of the sufficiency of the Offset Proposal. The following is such an environmental assessment of the proposed project described in an application for a Coastal Zone Act (CZA) Permit, received from Green Recovery Technologies, LLC ("GRT").

The fact that DNREC considers an application to be preliminarily, administratively complete does not constitute the Department's position as to whether the application should be approved or denied. That decision will not be made until after the public hearing. The purpose of the Secretary's written assessment is to assist the applicant and the public to focus on issues presented in the application. It constitutes an administrative determination that the application is sufficient to proceed to a public hearing. In addition, should the Department eventually issue the CZA Permit, it does not automatically guarantee the applicant will receive other required permits.

The Proposed Project

Poultry fines feedstock, consisting of approximately 58% lipids, 35% protein, and 7% moisture, are placed by a third party vendor (currently from out of state) into one ton, industrial-grade sealed plastic bins for truck transport to GRT at the estimated rate of 2 trucks of feedstock per operations day. The operation will take place inside a 120,000-square foot building, located on a parcel of property that is 9.13 acres in size, at 42 Lukens Drive, Riveredge Industrial Park, New Castle. GRT's process utilizes the liquefied gas dimethyl ether (DME) as the solvent to separate the proteins and lipids, resulting in a "high purity protein stream (free of oil)" and a "high purity lipid stream (free of protein)." The DME solvent is run in a closed-loop with full solvent recovery and automatic gas monitoring. The process occurs in equipment with nitrogen blanketing to reduce flammability concerns and the process has an integrated automatic fire detection and containment system. The resultant high quality feed ingredients (proteins and lipids) will then be sold and shipped to manufacturers in animal nutrition markets.

Environmental Assessment

The project will result in the following annual air emissions (in pounds) from the boiler used in the operation:

Pollutant	Existing Emissions		Net Increase/Decrease		New Total Emissions		Percent Change (compare tons/year)
	Lbs./day	Tons/year	Lbs./day	Tons/year	Lbs./day	Tons/year	
NOx	0	0	29.89	4.53	29.89	4.53	100%
CO	0	0	13.17	2.0	13.17	2.0	100%
CO ₂	0	0	18,903.52	2,863.88	18,903.52	2,863.88	100%
Lead	0	0	0	0	0	0	0%
N ₂ O	0	0	0.32	0.05	0.32	0.05	100%
SO ₂	0	0	0.16	0.02	0.16	0.02	100%
TOC	0	0	9.07	1.64	9.07	1.64	100%
Methane	0	0	0.32	0.05	0.32	0.05	100%
VOC	0	0	4.8	0.73	4.8	0.73	100%

In addition, office solid waste will be generated totaling approximately 5,625 pounds annually. No other environmental impacts are anticipated.

The GRT payroll will consist of 30 employees, 20 of which will be from Delaware and 10 from other states.

The site is in an industrial park and the planned project will be consistent with the current industrial park setting.

There will be no new supporting facilities and services required to support the proposed project.

Effects on neighboring uses will be minimal.

The proposed facility and operation is consistent with the New Castle County and City of New Castle comprehensive plans.

Offset Proposal

The applicant has obtained seven (7) NOx credits (four (4) ozone season and three (3) non-ozone season) and two (2) VOC credits (one (1) ozone season and one (1) non-ozone season) from the Delaware Economic Development Office as their offset for the boiler, dust collector, and fume hood emissions noted above; please see letter from DEDO, dated May 15, 2015, attached. Office paper and other office solid waste will be recycled in appropriate bins, collected by waste

disposal company and transported to an appropriate disposal location outside of the Coastal Zone. Packaging waste will be reused and/or recycled by the manufacturer.

Sufficiency Statement and Conclusion

This application for a CZA Permit, including supplemental information, has been reviewed by the Department to determine its completeness. After a thorough review of the company's application and file, the Department considers this application to be administratively complete and sufficient for proceeding to public hearing.

Approved:



David S. Small
Secretary

Date:

5/19/15

Coyle, Kevin F. (DNREC)

From: French, Joanna (DNREC)
Sent: Thursday, May 21, 2015 11:03 AM
To: Coyle, Kevin F. (DNREC); 'Hansen, Stephanie'; Foster, Paul (DNREC); Edge, Valerie (DOJ)
Cc: Cherry, Philip J. (DNREC); Bediako, Phaniel (DNREC)
Subject: RE: GRT CZA Permit Public Hearing

Importance: High

I have reviewed the permit application and the offset table for the Coastal Zone application.

I would request the following changes for the Air Section of the Coastal Zone Permit Application:

Net Increase and Total New Emissions			
Pollutant	Lbs/day	Tons/year	Percent Change
NO _x (boiler)	29.87	4.53	100%
CO (boiler)	13.17	2.00	100%
CO ₂ (boiler)	18,904	2,864	100%
N ₂ O (boiler)	0.32	0.05	100%
PM (powder)	9.07	1.37	100%
SO ₂ (boiler)	0.16	0.02	100%
TOC (boiler)	1.8	0.27	100%
VOC (DME)	0.70	0.11	100%

In addition, for the air permit application I am requesting manufacturer information for the particulate filter. Please let me know if you have any questions.

Thanks,
 Joanna

Joanna L. French, P.E.
 Managing Engineer
 DNREC - Division of Air Quality
 655 S. Bay Road, Suite 5 N
 Dover, DE 19901
 (302) 739-9402 (main number)
 (302) 739-3106 (fax)

Blue Skies Delaware; Clean Air for Life

From: Coyle, Kevin F. (DNREC)
Sent: Thursday, May 21, 2015 10:52 AM
To: 'Hansen, Stephanie'; Foster, Paul (DNREC); French, Joanna (DNREC); Edge, Valerie (DOJ)
Cc: Cherry, Philip J. (DNREC)
Subject: RE: GRT CZA Permit Public Hearing

The legal notice doesn't have to be to the News Journal until **3:00 pm** today. If we miss that target, we can advertise in next Wednesday's 5/27 News Journal for a June 17 public hearing and still be within the 20-day notice period. Thanks.

Kevin F. Coyle, AICP CEP
Principal Planner

DNREC, Division of Energy and Climate
1203 College Park Drive, Suite 101
Dover, DE 19904
302.739.9071
302.739.1840
Kevin.Coyle@state.de.us



From: Hansen, Stephanie [<mailto:shansen@ycst.com>]
Sent: Thursday, May 21, 2015 10:48 AM
To: Foster, Paul (DNREC); French, Joanna (DNREC); Edge, Valerie (DOJ)
Cc: Coyle, Kevin F. (DNREC)
Subject: RE: GRT CZA Permit Public Hearing
Importance: High

Paul, Joanna, and Val: Please see my email below and the email from Kevin Coyle. GRT needs to respond to Kevin within the hour on whether scheduling the CZA permit public hearing on June 17th is a go. As Paul and I discussed, GRT wants to run the public notice/comment/hearing process for the Reg 2 air permit concurrent with the CZA permit. Is this time line going to be acceptable to you? Will you be ready for us to advertise the notice for the Reg 2 permit this Sunday?

Stephanie L. Hansen
Counsel
Young Conaway Stargatt & Taylor, LLP
Rodney Square
1000 North King Street
Wilmington, DE 19801
P 302.571.6733
F 302.576.3519
shansen@ycst.com

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From: Hansen, Stephanie
Sent: Wednesday, May 20, 2015 4:03 PM
To: Foster, Paul (DNREC) (Paul.Foster@state.de.us); joanna.french@state.de.us
Cc: Edge, Valerie (DOJ) (Valerie.Edge@state.de.us)
Subject: FW: GRT CZA Permit Public Hearing

Paul: I left a message for you this morning checking in on your review of the material that I sent to you on 5/8/15 for the Reg 2 permit for GRT. When we last spoke, you mentioned that we could run the air permitting process concurrent with the CZA permit process. I received the email below from Kevin Coyle this afternoon. They want to go to public hearing on 6/17/15 for the CZA permit and need to know by TOMORROW at noon whether this works for my client. Can you tell how (if) this could work with the air permitting notice/comment/hearing process, please?

Stephanie L. Hansen
Counsel
Young Conaway Stargatt & Taylor, LLP
Rodney Square
1000 North King Street
Wilmington, DE 19801
P 302.571.6733
F 302.576.3519
shansen@ycst.com

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From: Coyle, Kevin F. (DNREC) [<mailto:Kevin.Coyle@state.de.us>]
Sent: Wednesday, May 20, 2015 3:21 PM
To: Hansen, Stephanie
Cc: Cherry, Philip J. (DNREC); Vest, Lisa A. (DNREC)
Subject: GRT CZA Permit Public Hearing

Stephanie – Would you and your client be available for a public hearing at 6:00 p.m. on Wednesday, June 17, 2015, at DNREC's Lukens Drive Office (391 Lukens Drive)? If so, we are trying to go to public notice in Sunday's 5/24 News Journal. I will need to send them the legal notice by 12 noon tomorrow, Thursday 5/21. Thanks.

Kevin F. Coyle, AICP CEP
Principal Planner

 DNREC, Division of Energy and Climate
1203 College Park Drive, Suite 101
Dover, DE 19904
 302.739.9071
 302.739.1840
 Kevin.Coyle@state.de.us



Coyle, Kevin F. (DNREC)

From: Hansen, Stephanie <shansen@ycst.com>
Sent: Friday, May 22, 2015 12:05 PM
To: French, Joanna (DNREC)
Cc: klaubsch@greenrecoverytech.com; Coyle, Kevin F. (DNREC); Foster, Paul (DNREC); Edge, Valerie (DOJ); Cherry, Philip J. (DNREC); Bediako, Phaniel (DNREC)
Subject: GRT - Filter Specifications and Revised Table
Attachments: SB Polyester.pdf; sb_media_description_sheet.pdf; Revised CZA Table 6.1 (5_21_15).pdf

Joanna: As requested, attached are two pdf's containing the manufacturer's information for the particulate filter installed within the dust collection system (Flexicon Model #BV-CBOT-X). Also attached is the revised table for section 6.1 of the CZA permit application. Please let me know if you would like any additional information.

Have a great holiday weekend!

Stephanie L. Hansen
Counsel
Young Conaway Stargatt & Taylor, LLP
Rodney Square
1000 North King Street
Wilmington, DE 19801
P 302.571.6733
F 302.576.3519
shansen@ycst.com

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SB

Description:

Base Material 100% synthetic spunbond

Treatment Options

- ePTFE Membrane (SB-TX),
- Hydro/Oleophobic (SB-HO),
- Carbon impregnated w/ePTFE membrane(CB-TX),
- Anti-static metalized (SB-ME)

FDA Compliant Media

Specifications:

MERV Rating (ASHRAE 52.2 2007)	MERV 12
Weight:	260 g/m ²
Thickness	0.024"
Air. permeability	20 CFM
Mullen Strength - Dry	Min 388 PSI
Max. Continuous Operating Temp	275°F

Initial Efficiency	E1: 51%
<i>Merv Test Results Standard Cartridge</i>	E2: 81%
	E3: 97%

Chemical resistance:

Oil/water	**
Hydrolysis	*
Acid	**
Alkali	*
Dust release	***

* Fair ** Good *** Very good **** Excellent

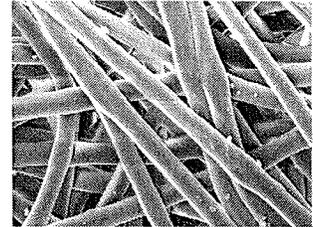
SB FILTER MEDIA

DESCRIPTION SHEET

SB FILTER MEDIA is a heavy-duty, 100% synthetic spunbond filter media

COMPOSITION

SB Filter media is a high strength 100% synthetic spunbond media with excellent durability, particulate release and moisture resistance.



APPLICATIONS

PARTICLE REMOVAL EFFICIENCY	MOISTURE RESISTANCE	WATER BREAKTHROUGH RESISTANCE	PULSE CAPABLE
ADEQUATE	YES	NO	YES

PERFORMANCE

PERFORMANCE CATEGORY	FILTER CLASS = MERV (MINIMUM EFFICIENCY)	PERMEABILITY (AIR FLOW)	MULLEN STRENGTH (DRY)
VALUE	12	20 CFM	Min 388 PSI
DETAILS	MERV is a measure of filter efficiency over a range of particle sizes. Higher MERV means greater efficiency. MERV ratings are from 1-16.	Permeability is a measure of airflow at a standard pressure. Higher Permeability can provide lower energy costs	Mullen is a measure of the filter media's burst strength integrity under pressure. Higher Mullen indicates stronger media and potentially longer media life.

TEMPERATURE RATING

	TEMPERATURE	
MAXIMUM CONTINUOUS TEMPERATURE	250°	Maximum continuous temperature without any spikes or surges.

MERV TEST RESULTS (STANDARD CARTRIDGE CONFIGURATION)

RANGE (PM)	0.3-1.0	1.0-3.0	3.0-10.0
MINIMUM INITIAL EFFICIENCY	51%	81%	97%

PART 6A (Revised Table)

ENVIRONMENTAL IMPACTS

Air Quality

- 6.1 Describe project emissions (new, as well as any increase or decrease over current emissions) by type and amount under maximum operating conditions:

Net Increase and Total New Emissions			
Pollutant	Lbs/day	Tons/year	Percent Change
NO _x (boiler)	29.87	4.53	100%
CO (boiler)	13.17	2.00	100%
CO ₂ (boiler)	18,904	2,864	100%
N ₂ O (boiler)	0.32	0.05	100%
PM (powder)	9.07	1.37	100%
SO ₂ (boiler)	0.16	0.02	100%
TOC (boiler)	1.8	0.27	100%
VOC (Dryer)	0.70	0.11	100%
VOC (Fume Hood)	3.30	0.50	100%



Street Address: (302) 324-2500
 950 West Basin Road (800) 235-9100
 New Castle, DE 19720

Mailing Address: Legal Desk:
 P.O. Box 15505 (302) 324-2676
 Wilmington, DE 19850 Legal Fax:
 302 324-2249

SD COASTAL ZONE IND BRD
 89 KINGS HWY

 DOVER, DE 19901

DNREC COASTAL ZONE
 ATTN: KEVIN COYLE
 89 KINGS HWY
 DOVERDE, 19901

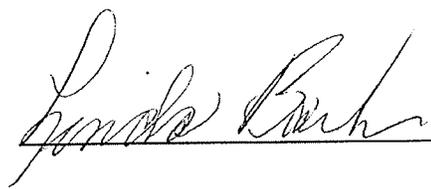
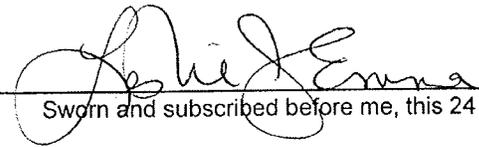
AFFIDAVIT OF PUBLICATION

State of Delaware
New Castle County

Personally appeared **The News Journal**

Of the **The News Journal Media Group**, a newspaper printed, published and circulated in the State of Delaware, who being duly sworn, deposeth and saith that the advertisement of which the annexed is a true copy, has been published in the said newspaper 1 times, once in each issue as follows:

05/24/15 A.D 2015

Sworn and subscribed before me, this 24 day of May, 2015

Ad Number: 0000475682

Legal notification printed in larger size for affidavit.



Ad Number: 0000475682

Run Dates: 05/24/15



LEGAL NOTICE
DNREC, Office of the Secretary
May 24, 2015

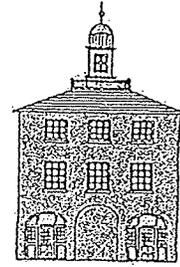
Coastal Zone Act Permit
And
Air Quality Management Permit
Public Hearings

Re: Green Recovery Technologies, LLC

In accordance with the Delaware Coastal Zone Act (7 Del. Code, Ch. 70) and the "Regulations Governing Delaware's Coastal Zone," this notice serves to announce that the Department of Natural Resources and Environmental Control (DNREC) will conduct a public hearing on the Application for a Coastal Zone Act Permit received from Green Recovery Technologies, LLC. The company is seeking a permit to construct and operate a facility at 42 Lukens Drive in the Riveredge Industrial Park, New Castle, that chemically separates high quality proteins and fats from a poultry fines feedstock into high quality feed ingredients for animal nutrition markets.

The public hearing for the Coastal Zone Act Permit will be held on Wednesday, June 17, 2015, at the DNREC office building at 391 Lukens Drive, New Castle, beginning at 6:00 p.m. Fifteen minutes after the Coastal Zone Act Permit hearing concludes, a second public hearing for the applicant's Air Quality Management Permit will be held.

The Coastal Zone Act Permit application, which can be reviewed at <http://www.dnrec.delaware.gov/Admin/CZA/Pages/default.aspx>, is considered to be preliminarily, administratively complete and sufficient to proceed to public hearing. The Division of Air Quality's Permit application (Permit: APC-2015/0106-CONSTRUCTION) can be reviewed at the offices of the Division of Air Quality Management at 715 Grantham Lane, New Castle, Delaware or 655 S Bay Road, Dover, Delaware. Interested persons may contact Kevin Coyle at (302) 739-9909 for more information about the Coastal Zone Act Permit, or Penny Gentry at (302) 739-9490 for more information about the Air Quality Management Permit.
5/24-NJ



New Castle Weekly

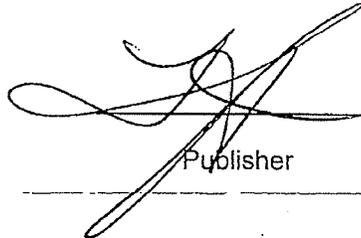
203 Delaware Street, New Castle, DE 19720-4815

302-328-6005

AFFIDAVIT OF PUBLICATION

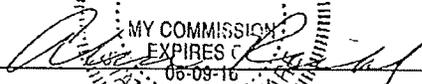
STATE OF DELAWARE
COUNTY OF NEW CASTLE

Personally appeared before me this 28th day of May, 2015, Theresa Gormley of the **New Castle Weekly**, a weekly newspaper published in the City of New Castle, County of New Castle, State of Delaware, who being duly sworn, states that the attached Notice of Public Hearing re Green Recovery Technologies, LLC was published in the **New Castle Weekly** on 5/27/2015.



Publisher

Sworn to me this 28th day of May, 2015

Notary Public

Coastal Zone Act Permit
And
Air Quality Management Permit
Public Hearings

Re: Green Recovery Technologies, LLC

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