

CHECKLIST ITEM #9
PROOF OF PERMIT APPLICATION

From: Charles Falletta <charlie@cermetmaterials.com>
Sent: Wednesday, October 03, 2018 1:43 PM
To: Bediako, Phaniel (DNREC) <Phaniel.Bediako@state.de.us>
Subject: air permitting for Eco Plastic Products of DE - RAS Project #2018-06

Dear Dr. Bediako,

I have researched emission factors for HDPE which we will be using in our extrusion process: The results for virgin material are summarized below (from Table 7 attached) .

	emission factors	Production of 200 Lbs/Day (est)
Particulates	19.6 - 26.6	.004 - .005 lbs day
VOC's	21.1 - 30.7	.004 - .006 lbs/day

For recycled HDPE, emission factors are only about 10% of those for virgin material (see table 1, attached). This is logical because most of the pollutants would be emitted in the first processing.

Our estimated production of about 200 lbs/day from recycled HDPE should produce negligible amounts of either particulates or VOC's .

The references used in the summary above are attached.

If you think I need additional information, please let me know. Also, should I send this information to anyone else at DNREC?

Sincerely yours,

Charles Falletta
Director
Eco Plastic Products of DE

Charles Falletta

From: Bediako, Phanuel (DNREC) [Phanuel.Bediako@state.de.us]
Sent: Friday, October 05, 2018 9:42 AM
To: Charles Falletta
Subject: RE: air permitting for Eco Plastic Products of DE - RAS Project #2018-06

Good morning Charles,
Based on your Emission Factors and a production of 200 lb/day of HDPE, aggregate emissions of PM and VOC are negligible (0.01 lb/day).
Your estimated production of 200 lb/day appears very low. You do not need an air permit for such a production level.
Michelle Jacobs already gave you some contact information within DNREC for recycling issues. I cannot think of any additional contacts.

Phanuel C. K. Bediako, Ph.D.
Engineer
Engineering and Compliance Branch
DNREC-Division of Air Quality
State Street Commons
100 W. Water Street, Suite 6A
Dover, DE 19904
Tel: (302) 739-9402
Fax: (302) 739-3106

Blue Skies Delaware; Clean Air for Life

From: Bediako, Phanuel (DNREC) [mailto:Phanuel.Bediako@delaware.gov]
Sent: Friday, May 24, 2019 9:58 AM
To: Charles Falletta
Subject: RE: air permitting for Eco Plastic Products of DE - RAS Project #2018-06

Good morning Charles,
Based on your Emission Factors and a production of 200 lb/day of HDPE, aggregate emissions of PM and VOC are negligible (0.01 lb/day).
If you double production to 400 lb/day of HDPE, emissions would double (0.02 lb/day).
My original conclusion is still valid.

Phanuel C. K. Bediako, Ph.D.
Engineer
Engineering and Compliance Branch

6/26/2019



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES AND
ENVIRONMENTAL CONTROL
DIVISION OF WATER
89 KINGS HIGHWAY
DOVER, DELAWARE 19901

SURFACE WATER
DISCHARGES SECTION

PHONE: (302) 739-9946
FAX: (302) 739-8369

**AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
STORM WATER GENERAL PERMIT PROGRAM
CONDITIONAL "NO EXPOSURE" EXCLUSION**

January 16, 2019

ECO Plastic Products of Delaware, Inc.
Charles Falletta
18 Germay Drive
Wilmington, DE 19804

RE: Conditional "No Exposure" Exclusion Approval and Authorization to Discharge Under the NPDES Storm Water General Permit Program at ECO Plastic Products of Delaware, Inc.

Dear Dr Falletta:

The Department has approved your request for Conditional "No Exposure" Exclusion, for "No Exposure" coverage under the National Pollutant Discharge Elimination System (NPDES) Storm Water General Permit Program. Permit coverage began on January 16, 2019 and will be in effect until such time that a new NPDES Industrial Storm Water General Permit is issued within the State of Delaware. Upon issuance of a new Industrial Storm Water General Permit, you will be required to submit a new "No Exposure" Certification form to the Department in order to continue permit coverage. The schedule for this "No Exposure" submission will be outlined in the new Industrial Storm Water General Permit once issued and communicated to you. Under no circumstances shall this authorization extend beyond five years.

Approval was granted because the certification submitted specifies that all processes and materials are protected from rain, snow, snowmelt, and/or runoff, in accordance with Section 9.1.1.5 of 7 Del. Admin. C. §7201 of the State of Delaware "Regulations Governing Storm Water Discharges Associated with Industrial Activities" (the Regulations). This approval means the site located at 18 Germay Drive, Wilmington, DE 19804 is covered under the Regulations, with the monitoring requirement (9.1.4) and the requirement for a Storm Water Plan (9.1.5) being exempt for this type of coverage.

"No Exposure" permit coverage is conditional. If a change in facility operations causes exposure of industrial activities or materials to storm water, a Notice of Intent (NOI) form must be submitted to the Department, along with a Storm Water Plan (submitted both hard copy and digitally). "No Exposure" forms and NOI forms can be found at: <http://www.wr.dnrec.delaware.gov/Information/SWDInfo/Pages/SWIDSSStormWater.aspx>.

Please maintain this "No Exposure" approval and NPDES authorization on file at the facility at all times. If you have any questions or require further assistance, please contact Bill Tanner at (302) 739-9946 or by e-mail at Bill.Tanner@state.de.us.

Sincerely,

Nicole L. Smith
Program Manager

Compliance and Enforcement Branch

cc: Dr Charles Falletta

Delaware's good nature depends on you!

Charles Falletta

From: Grazler, Tara (DNREC) [Tara.Grazler@state.de.us]
Sent: Monday, December 10, 2018 9:23 AM
To: Charles Falletta
Subject: RE: transporter permit

Mr. Falletta,

I spoke with my supervisor, you do not need a permit at this time for your volunteers to pick up plastic bags and bring them to your facility. In the future, if you send a paid employee with a company vehicle to pick up the bags, you will then need a permit.

Thank you,

Tara