



STATE OF DELAWARE
**DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL**
DIVISION OF AIR QUALITY
STATE STREET COMMONS
100 W. WATER STREET, SUITE 6A
DOVER, DELAWARE 19904

**ENGINEERING &
COMPLIANCE**

PHONE
(302) 739-9402

July 10, 2020

Permit: APC-2017/0100-CONSTRUCTION (Amendment 03)-(EXT)
Permit: APC-2017/0101-CONSTRUCTION (Amendment 03)-(EXT)
Permit: APC-2017/0102-CONSTRUCTION (Amendment 03)-(EXT)

NewCrete, LLC
Transit Mix Concrete Plant
91 Brenda Lane Suite A
Camden, DE 19934

ATTENTION: Frank DiMondi
Owner

Dear Mr. DiMondi:

Pursuant to 7 **DE Admin. Code** 1102, Section 2, approval of the Department of Natural Resources and Environmental Control (the Department) is hereby granted for the construction of the transit mix concrete plant that includes two CON-E-CO model LO-PRO-327 tower silos with two CON-E-CO model PJ-980D associated baghouses, and one cement batcher located at the NewCrete, LLC facility on 20354 Sussex Hwy., Bridgeville, Delaware, in accordance with the application submitted on Form Nos. AQM-1, AQM-2, AQM-3.1, AQM-3.7, AQM-4.6 and AQM-5 dated March 23, 2017, Form No. AQM-1 dated June 19, 2017 signed by Frank DiMondi, owner, letter dated May, 10, 2018 signed by Frank DiMondi, Owner and letter dated May 13, 2019 signed by Frank DiMondi, owner NewCrete, LLC and letter dated May 28, 2020 signed by Frank DiMondi, owner NewCrete, LLC.

Pursuant to 7 Del. C. § 6004(e) the Secretary has granted approval for a one-time two year extension of these permits, originally issued July 10, 2017.

This permit is issued subject to the following conditions:

1. General Provisions

- 1.1 This permit expires on July 10, 2022. If the equipment covered by this permit will not be constructed by July 10, 2022, an application for a new construction permit must be submitted.

Permit: APC-2017/0100-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0101-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0102-CONSTRUCTION (Amendment 03)-(EXT)

NewCrete, LLC

Transit Mix Concrete Plant

July 10, 2020

Page 2

- 1.2 The project shall be constructed in accordance with the application described above. If any changes are necessary, revised plans must be submitted and supplemental approval issued prior to actual construction.
- 1.2 Representatives of the Department may, at any reasonable time, inspect this facility.
- 1.4 This permit may not be transferred to another location or to another piece of equipment or process.
- 1.5 This permit may not be transferred to another person, owner, or operator unless the transfer has been approved in advance by the Department. Approval (or disapproval) of the permit transfer will be provided by the Department in writing. A request for a permit transfer shall be received by the Department at least thirty (30) days before the date of the requested permit transfer. This request shall include:
 - 1.5.1 Signed letters from each person stating the permit transfer is agreeable to each person; and
 - 1.5.2 An Applicant Background Information Questionnaire pursuant to 7 Del C, Chapter 79 if the person receiving the permit has not been issued any permits by the Department in the previous five (5) years.
- 1.6 The applicant shall, upon completion of the construction, installation, or alteration, request that the Department grant approval to operate.
 - 1.6.1 A separate application to operate pursuant to 7 **DE Admin. Code** 1102 does not need to be submitted to the Department for the equipment or process covered by this construction permit. Upon a satisfactory demonstration that the equipment or process complies with all of the terms and conditions of this permit, the Department shall issue a 7 **DE Admin. Code** 1102 Operating Permit for this equipment or process.
 - 1.6.2 The applicant shall notify the Department sufficiently in advance of the demonstration and shall obtain the Department's prior concurrence of the operating factors, time period, and other pertinent details relating to the demonstration.
 - 1.6.3 The provisions of 7 **DE Admin. Code** 1102 Sections 2.1 and 11.3 shall not apply to the operation of equipment or processes for the purposes of initially demonstrating satisfactory performance to the Department following construction, installation, modification, or alteration of the equipment or processes.
- 1.7 The owner or operator shall not initiate construction, install, or alter any equipment or facility or air contaminant control device which will emit or prevent the emission of an air contaminant prior to submitting an application to the Department pursuant to 7 **DE Admin. Code** 1102, and, when applicable 7 **DE Admin. Code** 1125, and receiving approval of such application from the Department; except as exempted in 7 **DE Admin. Code** 1102 Section 2.2.

Permit: APC-2017/0100-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0101-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0102-CONSTRUCTION (Amendment 03)-(EXT)

NewCrete, LLC

Transit Mix Concrete Plant

July 10, 2020

Page 3

2. Emission Limitations

- 2.1 Air contaminant emission levels shall not exceed those specified in 7 **DE Admin. Code** 1100 and the following:
 - 2.1.1 Particulate Matter (PM₁₀) Emissions
 - 2.1.1.1 PM₁₀ emissions shall not exceed 1.03 pounds per day and 1.30 tons per twelve (12) month rolling period;
 - 2.1.1.2 Particulate emissions shall not exceed 0.2 grains of particulate matter per standard cubic foot of exhaust air from each dust collector
- 2.2 No person shall cause or allow the emission of visible air contaminants and/or smoke from a stationary or mobile source, the shade or appearance of which is greater than twenty (20%) percent opacity for an aggregate of more than three (3) minutes in any one (1) hour or more than fifteen (15) minutes in any twenty-four (24) hour period.
- 2.3 Odors from this source shall not be detectable beyond the plant property line in sufficient quantities such as to cause a condition of air pollution.

3. Operational Limitations

- 3.1 The owner or operator shall comply with the following operational limits:
 - 3.1.1 The concrete plant's hours of operation shall not exceed 2,496 hours per rolling twelve (12) month rolling period.
 - 3.1.2 The maximum production rate of the transit mix concrete plant shall not exceed 300 Tons per Hour (150 Cubic Yards per Hour).
 - 3.1.3 The production of concrete shall include only aggregate and cements as raw materials.
 - 3.1.4 Fugitive emissions shall not be emitted in such quantities as to cause or create a condition of air pollution from material-handling operations, the stockpiling of material or vehicular traffic entering or leaving the facility. Dust control measures shall be employed on all non-paved access roads and driveways to the concrete production facility to minimize fugitive emissions from vehicular traffic entering or leaving. Dust control measures shall include methods such as water tanker/sprinkler trucks, water sprinkler systems, dust retardant sprays, etc.
 - 3.1.5 The facility shall determine the proper operating differential pressures for the two (2) CON-E-CO model LO-PRO 327 baghouses as recommended by the manufacturer.

Permit: APC-2017/0100-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0101-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0102-CONSTRUCTION (Amendment 03)-(EXT)

NewCrete, LLC

Transit Mix Concrete Plant

July 10, 2020

Page 4

- 3.1.6 The pressure differential across the filter cartridges in the PJC Model 300S Dust Collectors shall be maintained at or below 6 inches of water column with the lower range of the pressure differential to be determined during the construction to operation inspection.
- 3.1.7 The pressure differential across the filter cartridges in the PJ Model 980D Dust collector shall be maintained at or below 12 inches of water column with the lower range of the pressure differential to be determined during the construction to operation inspection.
- 3.2 For the process equipment and associated air pollution control equipment, the owner or operator shall comply with the following operational limits:
 - 3.2.1 The Company shall demonstrate compliance with the emission limitations by the proper use of dust collectors to control particulate emissions.
 - 3.2.2 Proper operation of the baghouses shall include implementation of a Baghouse Preventative Maintenance and Malfunction Plan acceptable to the Department. The plan shall include the following minimum requirements:
 - 3.2.2.1 Specifications for the baghouses including minimum and maximum pressure drop readings that define a proper operating range.
 - 3.2.2.2 Daily monitoring of pressure drop across the baghouses and comparison to the proper operating range.
 - 3.2.2.3 Quarterly inspection of the baghouse for leaks, wear, corrosion, dust accumulation, etc.
 - 3.2.2.4 Routine maintenance as recommended by the manufacturer.
 - 3.2.2.5 Troubleshooting procedures.
 - 3.2.2.6 Required recordkeeping.
 - 3.2.2.7 Schedule for review and update of the plan.
 - 3.2.2.8 The baghouses shall utilize filters with an efficiency of at least 99.95%.
 - 3.2.3 No process equipment that vents to the atmosphere shall be operated unless the corresponding air pollution control equipment is operating properly.
 - 3.2.4 The hopper for the truck mix dust collector shall be emptied daily in a proper manner.
 - 3.2.5 Each baghouse shall be equipped with a pressure differential gauge.

Permit: APC-2017/0100-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0101-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0102-CONSTRUCTION (Amendment 03)-(EXT)

NewCrete, LLC

Transit Mix Concrete Plant

July 10, 2020

Page 5

3.2.6 The pressure differential gauge shall be operating properly when the equipment is operating and in accordance with Condition 4.2.

3.3 At all times, including periods of startup, shutdown, and malfunction, the owner or operator shall, to the extent practicable, maintain and operate the facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

3.4 All structural and mechanical components of the equipment or process covered by this Permit shall be maintained in proper operating condition.

4. Testing and Monitoring Requirements

4.1 The Department reserves the right to require that the owner or operator perform emission tests using methods approved in advance by the Department.

4.2 For the process equipment and associated air pollution control equipment, the Company shall monitor the following:

4.2.1 The Company shall record the pressure drop across the baghouses at least once during each day and compare the result to the standard set in the Baghouse Preventative Maintenance and Malfunction Plan. If the pressure drop is outside the defined range, then the Company shall institute corrective action as set in the plan. If the pressure drop cannot be restored to the normal operating range within twenty-four (24) hours, the unit shall be shut down and the Department shall be notified of the deviation.

4.2.2 The Company shall inspect each baghouse according to the schedule set in the Baghouse Preventative Maintenance and Malfunction Plan.

4.2.3 The Company shall conduct a daily survey during daylight hours when the equipment is in operation to detect the presence or absence of visible emissions according to the following procedure:

4.2.3.1 "Survey of emission point for the presence or absence of visible emissions" shall be defined as a minimum period of five (5) consecutive minutes. The survey of the emission units concurrently is acceptable provided all emission points are easily observable from the observer's position.

4.2.3.2 The detection of the presence or absence of visible emissions shall be in accordance with the procedures of EPA Reference Method 22 (40 CFR 60, Appendix A) paragraphs 4 and 5.

Permit: APC-2017/0100-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0101-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0102-CONSTRUCTION (Amendment 03)-(EXT)

NewCrete, LLC

Transit Mix Concrete Plant

July 10, 2020

Page 6

4.2.3.3 If visible emissions are observed from an emission point for three (3) consecutive minutes during a survey, the observation shall be stopped and corrective actions per Condition 4.2.4 shall be taken.

4.2.3.4 This procedure does not require that the opacity of the emissions be determined. Since this procedure requires only the determination of whether a visible emission occurs and does not require the determination of opacity levels, observer certification according to the procedures of EPA Reference Method 9 (40 CFR 60, Appendix A) are not required. However, it is necessary that the observer is educated on the general procedures for determining the presence of visible emissions. As a minimum, the observer must be trained and knowledgeable regarding the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor).

4.2.4 If visible emissions are observed, the Company shall initiate troubleshooting procedures as outlined in the Baghouse Preventative Maintenance and Malfunction Plan.

5. Record Keeping Requirements

5.1 The owner or operator shall maintain all records necessary for determining compliance with this permit in a readily accessible location for five (5) years and shall make these records available to the Department upon written or verbal request

5.2 The following information shall be recorded, initialed and maintained in a log each day:

5.2.1 The Operating Procedures for Dust Control Plan shall include:

5.2.1.1 Statements that proper fugitive dust control measures were properly employed.

5.2.1.2 Dates, name of person doing the inspection, and description of inspections and maintenance performed on the dust collectors and other dust control equipment.

5.2.1.3 The occurrence and duration of any malfunction of the dust collectors.

5.2.1.4 The methods to control fugitive dust emissions as detailed in the required plan of Condition 3.1.4 have been followed daily.

5.2.1.5 The condition of the high level alarms on the cement bins when filling operations are performed.

5.2.1.6 Statement that the truck mix bin has been emptied.

Permit: APC-2017/0100-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0101-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0102-CONSTRUCTION (Amendment 03)-(EXT)

NewCrete, LLC

Transit Mix Concrete Plant

July 10, 2020

Page 7

- 5.2.1.7 The date, time and the nature of any complaints concerning air emissions or odors. The date and method of the corrective action should also be recorded. If necessary, the corrective action should be added to the required plan of Condition 3.1.4.
- 5.2.2 Compliance with Conditions 2.2, 2.3, 3.1.1, 3.1.2, 3.1.6, 3.1.7, 3.2.4, and 4.2.1.
- 5.2.3 The daily hours of operation of the concrete plant.
- 5.2.4 Daily yards of concrete produced.
- 5.2.5 Daily tons of cement used.
- 5.2.6 Identification of silo raw materials.
- 5.2.7 All observations of visible emissions made according to Conditions 4.2.3.
- 5.3 The following information shall be recorded, initialed and maintained in a file:
 - 5.3.1 The Baghouse Preventative Maintenance and Malfunction Plan shall include:
 - 5.3.1.1 Each day, the date, time, and results of the pressure drop across the filters and comparison to the proper operating range.
 - 5.3.1.2 All inspections of the filter structure, including the date of the inspections, person doing the inspections, and the findings.
 - 5.3.1.3 Routine maintenance as recommended by the manufacturer.
 - 5.3.1.4 Troubleshooting procedures.
 - 5.3.1.5 Schedule for review and update of the plan.
 - 5.3.1.6 Cartridge filters efficiency (manufacturer's specification).
- 5.4 Monthly and cumulative rolling twelve (12) month totals shall be calculated and recorded each month in a log for:
 - 5.4.1 The hours of operation of the concrete plant.
 - 5.4.2 The yards of concrete produced.
 - 5.4.3 The tons of cement used.
 - 5.4.4 Total Particulate Matter (PM) Emissions

Permit: APC-2017/0100-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0101-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0102-CONSTRUCTION (Amendment 03)-(EXT)

NewCrete, LLC

Transit Mix Concrete Plant

July 10, 2020

Page 8

6. Reporting Requirements

- 6.1 Emissions in excess of any permit condition or emissions which create a condition of air pollution shall be reported to the Department immediately upon discovery by calling the Environmental Emergency Notification and Complaint number, (800) 662-8802.
- 6.2 In addition to complying with Condition 6.1 of this permit, any reporting required by 7 **DE Admin. Code** 1203 "**Reporting of a Discharge of a Pollutant or an Air Contaminant**", and any other reporting requirements mandated by the State of Delaware, the owner or operator shall, for each occurrence of excess emissions, within thirty (30) calendar days of becoming aware of such occurrence, supply the Department in writing with the following information:
 - 6.2.1 The name and location of the facility;
 - 6.2.2 The subject source(s) that caused the excess emissions;
 - 6.2.3 The time and date of the first observation of the excess emissions;
 - 6.2.4 The cause and expected duration of the excess emissions;
 - 6.2.5 For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
 - 6.2.6 The proposed corrective actions and schedule to correct the conditions causing the excess emissions.
- 6.3 One original and one copy of all required reports shall be sent to the address below:

Division of Air Quality
State Street Commons
100 W. Water Street, Suite 6 A
Dover, DE 19904

7. Administrative Conditions

- 7.1 This permit shall be made available on the premises.
- 7.2 Failure to comply with the provisions of this permit may be grounds for suspension or revocation.

Permit: APC-2017/0100-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0101-CONSTRUCTION (Amendment 03)-(EXT)

Permit: APC-2017/0102-CONSTRUCTION (Amendment 03)-(EXT)

NewCrete, LLC

Transit Mix Concrete Plant

July 10, 2020

Page 9

7.3 This permit supersedes **Permit: APC-2017/0100-CONSTRUCTION (Amendment 03)**, **Permit: APC-2017/0101-CONSTRUCTION (Amendment 03)**, and **Permit: APC-2017/0102-CONSTRUCTION (Amendment 03)** dated June 17, 2019.

Sincerely,



Angela D. Marconi, P.E., BCEE
Engineering and Compliance Program Manager
Engineering & Compliance Branch

ADM:JLF:KMN

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pc: Dover File
Joanna L. French, P.E.
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