#### ATLANTIC CONCRETE COMPANY, INC. LEWES, DE-FACILITY

•The Atlantic Concrete Company, Inc. (referred to herein as Atlantic Concrete), has performed concrete manufacturing activities east of Five Points and north of Savannah Road in Lewes, DE, since the early 1960s.

•Currently, Atlantic Concrete has permits authorizing the operation of two (2) concrete manufacturing plants at its Lewes, DE Facility.

•Family owned and operated business.

•Actively engaged with neighboring communities in an effort to maintain transparent operations and responsive actions to all questions and concerns.

# REQUEST TO REPLACE EXISTING PLANTS

•Atlantic Concrete requested DNREC's approval to replace its existing 2 concrete manufacturing plants with one (1) concrete manufacturing plant that is more efficient and environmentally-friendly.

•The new plant will be erected at the same location, and once the new plant is constructed and fully operational, the current plants will be decommissioned and dismantled.

• There will not be any increase in land use area, the site will remain on five (5) acres currently utilized and approved for concrete production.

•Atlantic Concrete has obtained appropriate approvals/authorizations from Sussex County regarding the zoning and construction of the new plant.

## THE NEW PLANT

- Atlantic Concrete has requested to maintain its annual concrete production restriction and hours of operation restriction identified by the current Air Operating Permit associated with its 200 tph plant, thus not increasing its environmental impact
- The new plant offers a host of improved efficiencies in process and production such as better controls and efficient abatement equipment.
  - By replacing the existing 2 plants with 1 plant; the Facility will reduce the number of emission points associated with concrete production.
  - Emissions from loading, transfer, and mixing will be controlled by highly efficient baghouses. Operational controls ensure the baghouses are operating at all times to ensure proper abatement of dust emissions.
  - The conveyer will be covered to also limit dust emissions. This is a new enhanced feature when compared to the current plant.
  - The Facility has developed a Dust Control Plan for its operations.

# COASTAL ZONE ACT STATUS DECISION

- •Atlantic Concrete submitted a revised Coastal Zone Act Status Decision Application on Dec. 1, 2020 and received a decision from DNREC's Secretary Garvin on Jan. 26, 2021. The Secretary determined that the proposed activity does not require a CZA permit as it is considered a replacement in-kind of existing equipment.
- •The Facility has requested to maintain its annual concrete production restriction and hours of operation restriction identified by the current Air Operating Permit associated with its 200 tph plant, thus not increasing its environmental impact.
- •The CZA Status Decision was issued as Atlantic Concrete successfully demonstrated that operation of the new plant would not have an increased impact on the environment, economy, neighboring land uses, and other factors.

# AIR PERMIT APPLICATION PACKAGE

•After receiving the Secretary's decision, Atlantic Concrete submitted its revised Air Permit application package on January 22, 2021 (*original application submitted in July 2020 and was rescinded based on equipment modification and the need to obtain a CZA Status Decision*).

•DNREC's Department of Air Quality reviewed the air application and confirmed emission calculations. Emissions fall within NAAQs and DNREC regulations.

•DNREC's Department of Air Quality performed air dispersion modeling and confirmed air emissions at the plant's property line would not adversely affect the public's health, welfare, and safety.

•The Air Permit application does not request authorization to construct/operate a crusher unit.

#### SUMMARY

Atlantic Concrete believes that it has supplied all of the information requested by the Department and reaffirms its commitment to implementing the latest technology and practices for the continuous improvement of all its processes and conducting its operations in an environmentally sound manner. Atlantic Concrete believes that the Air Permit Application package complies with the objectives and requirements of the applicable provisions of the Delaware Code and the applicable regulations, standards and guidance set forth thereunder. Therefore, Atlantic Concrete respectfully requests that the Department issue the permit as set forth in the Application and as approved by the Secretary's Coastal Zone Act Status Decision.