



STATE OF DELAWARE  
**DEPARTMENT OF NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL**

OFFICE OF THE  
SECRETARY

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**Secretary's Assessment Report of a Coastal Zone Act Permit Application**

Graver Technologies, LLC.  
800 Centerpoint Boulevard, New Castle DE 19720  
CZA-444P

**Introduction**

Under subsection 8.5.3 of 7 *DE Admin. Code* 101 *Regulations Governing Delaware's Coastal Zone* ("Regulations"), the Secretary of the Department of Natural Resources and Environmental Control (DNREC) shall provide a written assessment of any application for a Coastal Zone Act permit, including the proposed project's likely impact on the criteria listed in subsection 8.1, as well as a preliminary determination of the sufficiency of the offset project under section 9.0 of the Regulations. The completion of this assessment acknowledges the application submitted by Graver Technologies, LLC (Graver) administratively complete. The fact that DNREC considers the application to be administratively complete does not constitute its position as to whether a permit should be issued or denied. That decision will be made after a public hearing is held and comments are reviewed.

**Proposed Project Overview**

Graver is proposing to renovate an existing building at 800 Centerpoint Boulevard, New Castle, Delaware to manufacture Ecosorb. Ecosorb is an industrial odor control product made of a blend of liquid and dry raw materials and activated carbon.

The proposed operations include mixing a blend of raw wet and dry materials and activated carbon utilizing an electric powered industrial Scott mixer/blender, drying the mixture, and packaging the final material. Additionally, an electric powered Donaldson Torit dust collector will be installed and operated to collect and reduce particulate matter emissions and an electric powered forklift will be utilized for moving the raw materials and the finished product. The final product will be stored on-site until it is shipped.

## Application Assessment

An application must consider the potential effect on the following criteria set forth in 7 *Del. C.* §7004(b) and subsection 8.1 of the Regulations:

1. Direct and cumulative environmental impacts
2. Economic effects
3. Aesthetic effects
4. Number and type of supporting facilities and their anticipated impacts
5. Effect on neighboring land uses
6. Compatibility with city and municipal comprehensive plans

### 1. Direct And Cumulative Environmental Impacts

#### Air Emissions

Air emissions associated with the production of Ecosorb (3.75 pounds per day/ 0.68 tons per year of total particulate matter) would be captured by a dust collection system and would therefore, equate to zero air emissions from the manufacturing process. Forklifts used in the facility would be electrical and would not add to air emissions.

The table below shows the air emissions without and with the use of the dust collection system. With the installation and use of the dust collector for the production process, there is expected to be a net zero increase in particulate matter when compared to pre-operation levels. As an additional pollution control measure, Graver will install an air purifier (noted as an "air scrubber" in the application).

Pollutant	Existing Emissions		Net Increase/ Decrease		New Total Emissions		Percent Change (compare tons/year)
	Lbs/day	Tons/year	Lbs/d.ay	Tons/year	Lbs/day	Tons/year	
Particulate Matter- without dust collector	0	0	3.75	0.68	3.75	0.68	100
Particulate Matter – With dust collector	0	0	0	0	0	0	0

#### Water Use and Discharge

The manufacturing process uses a maximum of 3,500 gallons of water per day from the City of New Castle municipal water supply. Wastewater would only be generated when the floors are washed (approximately once to twice per month) would not exceed 400 gallons per month. This water would drain directly into the City of New Castle sewer system from drains in the floor of the building. The wastewater discharged into the sewer system could contain an activated carbon concentration no greater than 50 parts per million (ppm) from the cleaning of

the equipment used in the manufacturing process. However, dry activated carbon will be collected and reused in the product line. The City of New Castle indicated to the applicant that a sewer permit will not be required for wastewater for the proposed activities.

#### Stormwater

The new activity would not generate an increase in stormwater runoff as the proposed project would occur within an existing building with no increase in impervious surfaces.

#### Land Erosion

The proposed project would operate within an existing building and would not impact land erosion.

#### Solid And Hazardous Waste

The manufacturing of Ecosorb will produce routine solid wastes and requires no additional permits for the disposal of this waste material.

#### Wetlands or Habitat for Flora and Fauna

The proposed project would operate within an existing building and would not impact wetlands or habitat for flora and fauna.

#### Glare, Heat, Noise, Vibration, Radiation, Electromagnetic Interference, Obnoxious Odors

Employees will wear personal protective equipment inside of the building, and the proposed project would not generate glare, heat, noise, vibration, radiation, electromagnetic interference, or obnoxious odors outside of the existing building.

#### Threatened or Endangered Species

Operations for the proposed project would occur entirely inside the existing building. DNREC Division of Fish and Wildlife did not identify any threatened or endangered species in the area around the existing building.

#### Potential To Pollute

The proposed project operations would be entirely inside an existing building. All particulate matter is anticipated to be captured by the proposed dust collection system. The greatest potential to pollute would occur if the filtration elements of the dust collect were to be damaged or if the dust collector has a mechanical failure. The dust collector will be inspected daily as part of routine factory operation. In the case of damage or mechanical failure of the dust collector, production of Ecosorb would be halted immediately until the system was repaired.

## 2. Economic Effects

A total of 27 permanent full-time year-round employees are projected to be hired to directly support the production of Ecosorb with salaries/wages ranging from \$25,000 to over \$100,000 per year. No part time staff is expected. Graver has hired a team of 8 construction workers for the building renovation process at approximately \$110/hour.

Taxes attributable to the manufacturing process of Ecosorb:

State corporate income taxes	\$116,000
Federal income tax	\$254,000

Property taxes are covered by the landlord as part of the lease agreement.

The project is anticipated to result in approximately \$1,171,966 of gross receipts.

## 3. Aesthetic Effects

The manufacturing operation will occur within an existing building and would not impact the aesthetics of the area.

## 4. Number and Type of Supporting Facilities Impacts

There are no new support facilities for this project. The proposed operation would occur within the existing building.

## 5. Effect on Neighboring Land Uses

Graver would conduct this proposed manufacturing on an existing industrial site zoned by the City of New Castle as "regular industrial" and will be compatible with neighboring land uses. A residential subdivision is under construction approximately 175 feet to the south of 800 Centerpoint Boulevard, the proposed project location. The two are separated by an active railroad and tree line. The proposed project would be entirely contained within the existing building and should not negatively impact neighboring land uses.

## 6. Compatibility with City and Municipal Comprehensive Plans

The City of New Castle confirmed that the proposed project is consistent with city and municipal planning.

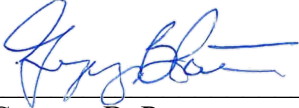
## Offset Proposal

As stated in the certified environmental impact statement provided by Graver, the proposed project with the use of the dust collector and air purifier as mitigation measures will not have any negative environmental impacts; and therefore, no offsets for this project are required.

### **Sufficiency Statement and Conclusion**

The application by Graver Technologies, LLC addresses the questions of the permit application, and the criteria required to be reviewed under 7 *Del. C.* §7004 and subsection 8.1 of the Regulations.

After reviewing the application materials and coordinating with subject matter experts within the DNREC, the Department considers the application administratively complete and sufficient to proceed to public hearing.

Approved:   
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Gregory B. Patterson  
Secretary, DNREC

Date: Feb. 23, 2025