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

Goodwill of Delaware and Delaware County, Inc.
400 Centerpoint Boulevard, New Castle DE 19720
CZA-445P

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 Goodwill of Delaware and Delaware County, Inc (Goodwill) 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

Goodwill is proposing to manufacture sand using recycled glass and ceramics inside their existing building at 400 Centerpoint Boulevard, New Castle, Delaware. The proposed operations would involve loading donated recycled glass and ceramics into a hopper which feeds into a pulverizer that crushes the materials into sand. The pulverized material would then be transferred to either sandbags or an open top storage container. The equipment planned for this project is an Andela Pulverizer System which includes a misting system, and a forklift for moving the raw and finished materials. The pulverizer is electrically powered. The forklift will be electrically powered with a rechargeable battery. .

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

The proposed project would result in particulate matter emissions associated with the pulverizer crushing the recycled glass and ceramics. The manufacturing process itself generates approximately 0.0624 pounds/day (0.00078 tons/year) of total particulate matter (PM). Forklifts used in the facility would be electrical and would not add to air emissions.

Table 1 below shows the particulate matter generated by the production of the sand from crushed glass and ceramics using a misting system to reduce PM emissions. Table 2 illustrates the potential PM that could be generated if the misting system fails for an extended period of time. The percent change of air emissions is 100 percent in both scenarios (with or without the misting system) because they are compared to a baseline of zero production as there is no current manufacturing occurring at this facility. However, in comparing the two scenarios, the misting system decreases the total PM emissions by approximately 97%.

Table1. Particulate Matter With Misting System

Pollutant	Existing Emissions		Net Increase/ Decrease		New Total Emissions	
	Lbs/day	*Tons/year*	*Lbs/d.ay*	*Tons/year*	*Lbs/day*	*Tons/year*
PM 2.5	0	0	0.00136	0.000017	0.00136	0.000017
PM 10	0	0	0.03152	0.000394	0.03152	0.000394
Total PM	0	0	0.0624	0.00078	0.0624	0.00078

Table 2. Particulate Matter Without Misting System

Pollutant	Existing Emissions		Net Increase/ Decrease		New Total Emissions	
	Lbs/day	*Tons/year*	*Lbs/d.ay*	*Tons/year*	*Lbs/day*	*Tons/year*
PM 10	0	0	0.7152	0.00894	0.7152	0.00894
Total PM	0	0	2.7552	0.03444	2.7552	0.03444

Water Use and Discharge

The manufacturing process uses a maximum of 50 gallons of water per day, two days per week from the City of New Castle municipal water supply. This water is used in the misting system to reduce particulate matter. No wastewater is generated from this process as the manufactured sand absorbs the water and is allowed to air dry.

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 the sand 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 operations would occur entirely within the existing building. The potential to pollute would occur if the misting system were to be damaged. The misting system will be inspected daily as part of routine factory operation. In the case of damage or mechanical failure of the misting system, production of the recycled glass and ceramics would be halted until the system was repaired.

2. Economic Effects

Goodwill will be using existing staff to operate the machine, so no new additional full or part time staff are expected to be hired to directly support the production of the crushed glass and ceramics.

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

All supporting infrastructure will be provided by Goodwill within the existing footprint of the building.

5. Effect on Neighboring Land Uses

Goodwill would conduct the 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. The nearest residential area is Heron Circle, a residential subdivision that is located approximately 1100 feet to the south of 400 Centerpoint Boulevard. 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

The production of the recycled sand using glass and ceramics generates 0.0624 pounds/day (0.00078 tons/year) of total particulate matter with the use of a misting system within the existing building. Goodwill retained Brownfield Science and Technology, Inc. (BSTI) to conduct an analysis of the proposed production process. BSTI concluded that, given the scope of the project, there would be no negative environmental impacts from the generation of the particulate matter at a concentration of 0.00078 tons/year. Since there are no negative environmental impacts, no offset proposal is required.

Sufficiency Statement and Conclusion

The application by Goodwill 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: _____ Date: March 22, 2025

Gregory B. Patterson
Secretary, DNREC