

DELAWARE COASTAL ZONE ACT PERMIT



NUMBER: CZA-447P

ISSUED TO: North Fish USA, Inc.

TO PERMIT: Production of up to 3,096 tons/year of smoked fish

SITE LOCATION: 200 Centerpoint Boulevard, New Castle DE, 19720

Pursuant to 7 *Del C.* §7005, the Department of Natural Resources and Environmental Control has the authority to administer *Regulations Governing Delaware's Coastal Zone*. The applicant must comply with all conditions as attached to this permit.

Signature: _____ Date: _____

Gregory Patterson, Secretary

Department of Natural Resources and Environmental Control



STATE OF DELAWARE
**DEPARTMENT OF NATURAL RESOURCES AND
ENVIRONMENTAL CONTROL**
RICHARDSON & ROBBINS BUILDING
89 KINGS HIGHWAY
DOVER, DELAWARE 19901

**OFFICE OF THE
SECRETARY**

**PHONE
(302) 739-9000**

CONDITIONS INCORPORATED AND MADE PART OF THIS PERMIT

North Fish USA, Inc.
Permit CZA-447P

The following conditions apply to the production of smoked fish by North Fish USA, Inc. (North Fish). Failure to comply with these conditions may be grounds for permit suspension or revocation.

1. GENERAL PROVISIONS

- 1.1 This permit is conditional upon the permittee's compliance with all other applicable permit requirements, regulations, and laws of the State of Delaware.
- 1.2 Issuance of this permit does not relieve the permittee of the legal obligation of complying with all building permit, subdivision, and other applicable code requirements of the county and municipality wherein the permitted project is located.
- 1.3 If there are deviations from the plans and operations detailed in the Coastal Zone Act application reviewed by the Department and dated July 14, 2025, the permittee shall notify the Secretary as soon as possible. This permit may be revoked, and a new permit application required if the Secretary deems the deviation to change the nature or scale of the project and to be of actual or probable harm to the intent of the Coastal Zone Act.
- 1.4 The manufacturing of any additional products or any research and development initiatives are outside the scope of this permit and may require either a new CZA permit or a permit modification.
- 1.5 A request for a permit modification to change ownership, control, or any substantive term of a permit shall be submitted in writing. A modification of the ownership or operating entity in a permit shall be granted only if the prospective

permittee satisfies all the applicable requirements of the regulations under the *Regulations Governing Delaware's Coastal Zone*.

- 1.6 This permit may not be transferred to another location or process within the Coastal Zone.
- 1.7 This permit is valid for a duration of twenty years from the original date of issuance on **DATE**. The permittee shall submit a renewal application no fewer than 180 days prior to the expiration of this permit.

2. ADMINISTRATIVE CONDITIONS

- 2.1 The permittee shall have available at the facility at all times a copy of this permit and shall provide a copy of this permit to the Department upon request.
- 2.2 The permittee shall authorize officials of the Department to:
 - 2.2.1 Enter upon the facility premises where a source is located or an emissions-related activity is conducted, or where records that must be kept under the terms and conditions of this permit are located;
 - 2.2.2 Have access to and copy, at reasonable times, any record(s) that must be kept under the terms and conditions of this permit;
 - 2.2.3 Inspect, at reasonable times, any record(s) that must be kept under the terms and conditions of this permit; and,
 - 2.2.4 Sample or monitor, at reasonable times, any substance or parameter for the purposes of assuring compliance with this permit or any applicable requirement.
- 2.3 The permit holder must notify the Department within 15 days after initiating manufacturing operations.

3. OPERATIONAL LIMITATIONS AND CONDITIONS

- 3.1 Operations include the manufacturing of 3,096 tons/year of smoked fish.
- 3.2 The permittee shall plant the trees included in the planting plan as close to the start of operations as possible. At least 75% of the trees shall be planted no later than November 30, 2025, and all trees included in the planting plan must be planted no later than May 15, 2026.
- 3.3 At all times the owner or operator shall, to the extent practicable, maintain and operate the facility in a manner consistent with good pollution control practices for minimizing emissions.

- 3.4 All structural and mechanical components of the equipment covered by this permit shall be maintained in proper operating condition.
- 3.5 The permittee shall adhere to the following odor control plan:
- 3.5.1 All organic waste, including fish byproducts, will be disposed of in fully functional and intact durable plastic containers.
 - 3.5.2 Baking soda shall be applied to the bottom of the waste container and on top of each layer of organic waste at a minimum rate of 125 lbs of baking soda for every ton of waste such that no organic waste is directly exposed to the atmosphere while the container lid is open.
 - 3.5.3 The organic waste containers will be washed out and sanitized at least once every three days.
 - 3.5.4 The organic waste will be picked up and removed from the facility site at least twice per day.
 - 3.5.5 Absolutely no organic waste is to be left in the waste containers overnight.
 - 3.5.6 Waste container lids must be closed and locked when not in use to prevent wildlife from accessing the organic waste and to minimize open air exposure.
 - 3.5.7 Facility doors, windows, and delivery truck bays must remain closed when not in use.
- 3.6 A wet scrubber shall be installed to reduce particulate matter and volatile organic compound emissions. The wet scrubber must remain functional during all operations and must be cleaned and maintained as recommended by the manufacturer. Emissions after mitigation with the wet scrubber shall not exceed the values in the table below.

Emission Type	Total Emissions (Tons/Year)
PM 2.5	0.26
VOCs	0.10

4. RECORDKEEPING AND REPORTING REQUIREMENTS

- 4.1 The permittee shall retain any and all records relevant to the permit and compliance therewith:

- 4.1.1 The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the facility.
- 4.2 The permittee shall notify the Department immediately of any event or condition that affects their ability to comply with the terms of the permit or of any violation of any term or condition of the permit.
 - 4.2.1 The permittee shall notify the Department's 24-hour complaint line (1-800-662-8802) after activating the appropriate site emergency plan, any deviation that poses an imminent and substantial danger to public health, safety, or the environment.
 - 4.2.2 Tree health is to be monitored annually, and the monitoring data and conclusions shall be included in the required compliance report described in 4.3.
 - 4.2.3 The trees planted for the offset shall be maintained for optimal health. North Fish shall replace any tree that does not survive to the same specifications as noted in the offset plan (i.e., size, age, class, species, etc.). Any replacement trees shall be planted during the next viable planting season.
 - 4.2.4 The permittee shall within 30 days of becoming aware of an event or condition that affects their ability to comply with the terms of the permit, supply the Department in writing with the following information:
 - 4.2.4.1 The subject source(s) that caused the event, condition, or violation;
 - 4.2.4.2 The time and date of first observation of the event, condition or violation;
 - 4.2.4.3 The cause and expected duration of the event, condition, or violation;
 - 4.2.4.4 The estimated rate of release and the operating data and calculations used in determining the magnitude of the event, condition, or violation; and,
 - 4.2.4.5 The proposed corrective actions and schedule to correct the conditions causing the event, condition, or violation.
- 4.3 Beginning in October 2030 and continuing every five (5) years for the duration of the permit, the permittee shall submit documentation to the CZA program certifying compliance with these permit conditions. The permittee shall submit the compliance documentation within 30 days of the 5-year anniversary of issuance.