From: Smith, Melanie A. (DNREC)
To: DAQ.DNRECtory
Subject: Middletown Materials
Date: Tuesday, September 8, 2026 9:19:00 AM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png

Application for Middletown Materials. Thank you.

Melanie Smith, P.E.
Engineer
Phone: 302-739-9436
Email: melanie.smith@delaware.gov
100 W. Water Street, Suite 6A, Dover, DE 19904
dnrec.delaware.gov

From: [redacted]
Sent: Tuesday, September 8, 2026 9:09 AM
To: Smith, Melanie A. (DNREC) <Melanie.Smith@delaware.gov>
Subject: Re: Air Permit Follow-up

Hi Melanie,

Thank you. I reviewed the NOx calculations and the historical operating hours for the higher-emitting equipment. Rather than further restricting the 1,300-hour limit applicable to the newer equipment, we would like to propose reducing the existing operating limits for GCS-04, GCS-15, and GCS-16, since their actual utilization is substantially below their current permitted limits.

Recent operating hours are as follows:

- GCS-16 Nordberg Crusher: 328 hours in 2024 and 263 hours in 2025.
- GCS-04 650 HP Morbark Tub Grinder: 0 hours in 2024 and 2025; 57 hours in 2023. The unit had been out of service for an extended period and only recently returned to operation.
- GCS-15 750 HP Morbark Tub Grinder: 0 hours in 2024 and approximately 2 hours in 2025. Even accounting for the reported hour-meter issue, annual operation would have been less than 100 hours. The unit operated 191 hours in 2023.

Based on this operating history, would the Department accept revised rolling 12-month operating limits of:

GCS-16 – 1,000 hours
GCS-04 – 500 hours
GCS-15 – 500 hours

Using the NOx emission rates in the draft memorandum, I calculate these revisions would reduce facility-wide permitted NOx emissions from approximately 31.78 TPY to approximately **23.0 TPY**, providing reasonable margin below the 25 TPY threshold while still allowing operational flexibility.

Please let me know if you agree with this approach. I am also available for a Teams meeting if it would be easier to discuss.

Thank you.

[redacted]
Program Manager
RainWise Environmental Solutions, LLC.
302.423.8137
www.rainwiseenviro.com.
[redacted]

On Wed, Aug 5, 2026 at 4:06 PM Smith, Melanie A. (DNREC) <Melanie.Smith@delaware.gov> wrote:

> [redacted],
> I got through the actual emissions using 1300 hours and we're still above 25 TPY NOx for New Castle and Kent Counties. Attached is the draft memo so you can see which equipment are high emitters (page 12). Also, I have GCS-11 engine manufactured in 2004. I believe the 1999 year; just want to confirm.
> If you want a TEAMS meeting, we can do that.
>
> **Melanie Smith, P.E.**
> **Engineer**
> Phone: 302-739-9436
> Email: melanie.smith@delaware.gov
> 100 W. Water Street, Suite 6A, Dover, DE 19904
> **dnrec.delaware.gov**





From: [redacted]
Sent: Wednesday, August 5, 2026 8:10 AM
To: Smith, Melanie A. (DNREC) <Melanie.Smith@delaware.gov>
Subject: Fwd: Air Permit Follow-up

Hi Melanie,

I hope you are doing well.

Below please find responses to your comments. Please let me know if you need any additional information.

1. Comment: To finish the memo, I need AERSCREEN input for the mechanical pieces of equipment. The crushers and screeners: long side and short side of the inlet plane and the height of the plane above ground. For the transfer points to a stockpile, these are volume sources. I'll need the square root of the total footprint area of the volume source at the ground and the height from the ground to the conveyor discharge. I don't believe there's any way to model conveyor to conveyor. For a conveyor to a screener, it would be the square root of the screener floor area and the height from the screener floor to the discharge point of the conveyor.

Response: See attached document. Please review and let me know of any comments.

2. Comments: Any proof of the Tier designations for the engines.

Amber: Available certificates attached.

3. Comment: Will (or are) Middletown Materials be using GCS-04, 15, 21, or 16 from

Permit: APC-2002/0738-OPERATION (SM)(Amendment 12) before you get Amendment 13? It's fine if they are but I will have to separate the permits.

Response: yes.

4. Melanie's Comments: 7 **DE Admin. Code** 1125, Section 4.3, *Minor New Source Review, Requirements for Preconstruction Review*, is applicable. The new sources were constructed after August 11, 2005, the sources require a permit under 7 **DE Admin. Code** 1102, Section 2.1.3, and the sources are not covered by the Emission Offset Provisions (EOP) or Prevention of Significant Deterioration of Air Quality (PSD). Provide construction dates for the following units.

Amber's Response:
GCS32: Equipment manufactured 2025
GCS29: Equipment manufactured in 2012.
GCS24: Equipment manufactured in 2010.
GCS11: Equipment manufactured in 1999:
GCS18: Equipment manufactured in 2011
GCS28: Equipment manufactured in 2017

5. Comment: You need to further reduce NOx emission to below 25 tpy.

Resp0nse: The site is willing to restrict hours of operation to 1300 per year operation for the equipment?

6. Comment: You need to identify a community contact for each County.

Response: I believe a contact was provided in the application for New Castle County.

Sussex County: [redacted]
Organization Represented by Community Leader: President Blue Heron Estates HOA President
Local Community Leader E-Mail Address: [redacted]
Local Community Leader Telephone number: [redacted]

Kent County: [redacted], Treasurer, DOWRA [redacted]

[redacted]
Program Manager
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[redacted]

