

DEPARTMENT OF NATURAL RESOURCES AND **ENVIRONMENTAL CONTROL**

DIVISION OF WASTE AND HAZARDOUS SUBSTANCES 89 KINGS HIGHWAY **DOVER. DE 19901**

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COMPLIANCE & PERMITTING

> Permit SW-23-01 Permit Type: Recycling

Effective Date:

March 2, 2023

Last Modified:

n/a

Expiration Date: March 1, 2025

Permittee:

Phoenix Used Clothing

132 Sandy Drive Newark, DE 19713

Pursuant to Delaware's Regulations Governing Solid Waste ("DRGSW"), Section 2.5.2, the Department of Natural Resources and Environmental Control ("the Department") hereby issues Recycling Permit #SW 23/01 ("Permit") to Phoenix Used Clothing (PUC) to accept, process, and temporarily store specific post-consumer recyclable textile and other specific wastes for the sole purpose of recycling as detailed below on New Castle County Tax Parcel 1803800023 located at 132 Sandy Drive in Newark, Delaware (see attached site map). The recyclable wastes PUC may accept, process, and temporarily store are specifically limited to textiles, small consumer household items (e.g. pots, pans, utensils, etc.), shoes and hard toys sourced primarily from both residential and commercial sources as well as a network of drop-off locations that PUC maintains throughout the State. PUC will process the received acceptable wastes into categories that can be further marketed to the recycling community or reused by interested parties. The acceptance, processing, or storage of waste other than as described above and herein is prohibited.

I. GENERAL CONDITIONS

- A. Pursuant to Delaware's Regulations Governing Solid Waste ("DRGSW"), Section 2.5.2, the Department of Natural Resources and Environmental Control ("the Department") hereby issues Recycling Permit #SW 23/01 ("Permit") to Phoenix Used Clothing (PUC) to accept, process, and temporarily store specific post-consumer recyclable textile and other specific wastes for the sole purpose of recycling as detailed below on New Castle County Tax Parcel 1803800023 located at 132 Sandy Drive in Newark, Delaware (see attached site map). The recyclable wastes PUC may accept, process, and temporarily store are specifically limited to textiles, small consumer household items (e.g. pots, pans, utensils, etc.), shoes and hard toys sourced primarily from both residential and commercial sources as well as a network of drop-off locations that PUC maintains throughout the State. PUC will process the received acceptable wastes into categories that can be further marketed to the recycling community or reused by interested parties. The acceptance, processing, or storage of waste other than as described above and herein is prohibited.
- B. This Permit shall be conducted in accordance with the conditions herein and with the following documents, as submitted to the Department: (1) Recycling Permit Application, dated November 11, 2022, and associated and/or supplemental documentation, such as the submitted Plan of Operation, dated November 7, 2022; (2) pre-self-funded, State-approved financial assurance mechanism (Appropriation ID No. 25228, Program Code 40ZE5), dated January 18, 2023, in the amount of \$21,865.90 and related documents; and (3) other procedures and policies specifically referenced in this Permit. Conditions of this Permit shall take precedence over any of the above listed documents. Failure to comply with any condition of this Permit or any provision within the aforementioned documents is a violation of this Permit.
 - 1. The sole purpose of the pre-self-funded, State-approved financial assurance mechanism is to make available funds sufficient to complete facility closure in accordance with the closure requirements provided in Section VI of this permit and in accordance with the approved Conceptual Closure Plan submitted as a portion of PUC's recycling permit application only in the event that PUC fails to independently satisfy the referenced closure requirements and plan upon facility closure.
 - 2. In the event that PUC independently satisfies the facility closure requirements provided in Section VI of this Permit and their approved Conceptual Closure Plan, all PUC monies retained in the State-approved financial assurance mechanism, as referenced above, shall be returned to PUC in full.

C. Permit Availability

PUC shall maintain a copy of this Permit and the Plan of Operation at the facility and shall immediately make available, upon request, a copy of this Permit to any representative of the Department or any law enforcement officer

D. Renewal

Per DRGSW Section 4.1.6, PUC shall submit a permit application with all supporting documentation to the Department at least 180 days prior to the expiration of this Permit if applicant desires to renew the Permit. As such, the Permit renewal application package deadline is Friday, August 30, 2024.

E. Modifications

- 1. The Department may initiate modification of this Permit, including, but not limited to, additional limitations, requirements, and/or special conditions, at any time if the Department finds that the existing permit conditions are either not adequate or not necessary to protect human health and the environment, as set forth in DRGSW Section 4.1.7.2, or in the event the regulations governing activities authorized in this Permit are revised.
- 2. PUC shall petition the Compliance and Permitting Section of the Department ("te CAPS") in writing at least 90 days prior to the anticipated need to implement any change in waste characteristics; changes that will alter the beneficial use of the incoming waste material; or changes to processes, operations, or procedures described in the application documents referenced in Section I.B. of this Permit. PUC shall not implement said changes unless and until they have been notified in writing from the CAPS agreeing to the change(s).

F. Permit Transfer

At least 60 days prior to the date of the proposed transfer, PUC must submit all documentation required by DRGSW Section 4.1.8. The actual transfer will be contingent upon the transferee meeting all permit and regulatory requirements; until such time, the current permittee will remain liable for compliance regardless of who owns the facility.

G. Revocation or Suspension

This Permit may be revoked or suspended upon violation of any condition of this Permit, DRGSW, or 7 Del. C. Chapter 60

II. OPERATING CONDITIONS:

A. Definitions

The following terms, for the purposes of this Permit only, are defined as:

- 1. Collection facility means the physical space at a partner host organization property or site where PUC collection receptacles are located to include the general associated proximal area. More than one collection facility may be present at a partner host organization property or site.
- 2. Out-throws means wastes accepted as an incidental portion of the approved incoming waste streams that are composed of either non-recyclable or low quality recyclable materials that have limited or no value to PUC.
- 3. Partner host organization (PHO) means a community organization, such as a school, library, or church, which has agreed to team with PUC to host collection receptacles
- 4. PUC Personnel: This means any direct employee of PUC and/or contractors hired to provide services on behalf or as a representative of PUC to customers.
- 5. Source-separated means a waste which has been intentionally segregated into discrete waste streams based upon composition by the generator for the purposes of recycling.

B. Operating Hours

1. The PUC facility shall operate from 9:00 am to 5:00 pm Monday through Friday and

Saturdays by appointment only.

2. Collection facility hours shall be restricted to the business hours of the PHO.

C. Locations

1. 132 Sandy Drive, Newark

The PUC recycling facility shall operate on Tax Parcel Number 1803800023 located at 132 Sandy Drive in Newark, Delaware, which is owned by FJN Enterprises, LLC of 12 Brady Circle, Middletown, Delaware and leased to PUC. The lease is incorporated into this Permit by reference and by inclusion in the Recycling Permit Application.

- a. PUC shall adhere to the terms of the lease and maintain "good standing" with regard to the lease.
- b. Future lease agreements (renewals) in which the terms of the lease are unmodified will be automatically incorporated herein.
- c. Modifications to the terms of the lease agreement, either at the time of renewal or otherwise, which do not result in deviations to the approved Plan of Operation or changes to facility operations will be automatically incorporated herein.
- d. PUC shall document all violations of the lease, all lease renewals, and all lease modifications and shall retain the records in accordance with Section IV.B.17. of this Permit.
- e. PUC shall notify the CAPS, in accordance with Sections V.C.3 of this Permit, of lease termination, all lease violations, and any lease modification with the potential to cause a deviation from the approved Plan of Operation or changes to facility operations.
- f. The CAPS will determine if a change to the terms of the lease agreement, either at the time of renewal or otherwise, with the potential to cause a deviation from the approved *Plan of Operation* or changes to facility operations may be incorporated herein or will require modification of this Permit.

2. Collection Facilities

- a. PUC's primary supply of acceptable wastes will be from a collection bin network that partner community organizations host. These are referred to as partner host organizations or PHOs. Partners may include organizations such as schools, libraries, commercial shopping areas and other locations where collection bins can be hosted. The bin will specifically be for the collection of textiles, small household items, hard toys, and shoes.
 - i. An alternative supply of these wastes will be through donations of delivered directly to the PUC facility.
- b. Collection facilities shall be subject to the conditions of this Permit.
- c. PHOs shall register with PUC to serve as a collection facility.
- d. PHOs shall designate a member of their on-site personnel to be the Collection Facility Point-of-Contact ("POC") responsible for the collection facility and associated activities.
- e. The information required to register as a collection facility shall be established to

comply with the conditions of this Permit but shall, at a minimum, include:

- i. PHO's name;
- ii. PHO's address;
- iii. PHO's phone number;
- iv. POC name;
- v. POC title and/or position;
- vi. POC direct phone number;
- vii. Daily average/typical population, attendance, or number of visitors at/to the PHO; or, in other words, the estimated number of individuals anticipated to have access to PUC's collection receptacles at the PHO, and;
- viii. Number of PUC receptacles at the PHO site(s).
- f. PUC shall provide each PHO with sufficient and appropriate resources to prperly manage the collection facility in a manner protective of human health and the environment, and pursuant to the conditions of this Permit.
- g. PUC shall maintain regular periodic communication with its PHO sufficient to ensure proper collection facility operations.
- h. PHOs shall retain the right to discontinue their partnership with PUC at any time and remove PUC's collection receptacles from use.
- i. PUC shall provide the CAPS' contact information to its PHOs.
- j. PUC shall provide a copy of this Permit to its PHOs.
- k. PUC shall remove their collection receptacles from PHO sites at the request of the Department should the PHO fail to properly manage the collection facility in compliance with the conditions of this Permit, the DRGSW, and 7 Del. C. Chapter 60.

D. Security and Access

PUC shall control access to the facility by using barriers, fences, gates, or other suitable means to prohibit the entry of unauthorized individuals. Representatives of the Department may enter the facility to verify compliance with the conditions of this Permit, the DRGSW, and 7 Del. C. Chapter 60.

a. Representatives of the Department may access any of PUC's satellite collection facilities at any time to verify compliance with conditions of this permit, the DRGSW, and 7 Del C. Chapter 60.

E. Staffing

- 1. PUC shall ensure sufficient numbers and types of personnel are available at the facility to ensure capability for operation in accordance with DRGSW, the Plan of Operation, and this Permit.
- 2. PHOs shall designate a member of their on-site personnel to be the POC responsible for the collection facility and associated activities.
 - a. The designated PHO personnel shall serve as the POC for both PUC and the Department.
 - b. The designated POC shall be responsible, on behalf of the PHO, for the wastes accepted at the collection facility until such time PUC accepts the donated wastes.
 - c. The designated POC shall be responsible for the proper management and handling of any prohibited wastes placed into PUC's receptacles at the collection facility which PUC rejects upon inspection prior to transportation of said wastes to the

PUC facility.

d. The designated POC shall be responsible for correcting unsatisfactory and/or non-compliant conditions associated with PUC's collection receptacles at the collection facility.

F. Litter

- 1. PUC shall inspect the entire facility daily for general cleanliness.
- 2. The designated POC shall be responsible for correcting litter associated with PUC's collection receptacles at the individual collection facility.
 - a. When PUC personnel are present at a collection facility to retrieve and transport collected recyclable wastes, the PUC personnel shall visually inspect the immediate area of PUC's collection receptacles to determine if litter is being adequately controlled.
 - i. PUC personnel shall notify their PUC supervisor of the results of said inspection.
 - ii. PUC personnel shall notify the POC of any deficiencies observed with regard to litter control.
 - b. PUC personnel shall inquire of the POC whether or not any complaints of litter associated with the collection facility have been received.
- 3. All litter encountered shall be immediately collected, placed in a covered container, and sent for disposal at an approved disposal facility within 72 hours of the container becoming full or at the Department's request to dispose of the waste (whichever comes first).
- 4. Fugitive wastes proximal to the PUC facility that escaped from incoming waste streams and/or out-going shipments of out-throws, incidental wastes, and/or other out-bound wastes shall be considered and managed as litter and shall be included in the daily litter inspection.
- 5. In an attempt to limit fugitive wastes, in-bound and out-bound loads of wastes shall be transported within enclosed vehicles, tarped, and/or otherwise contained.
- 6. PUC shall implement good housekeeping practices and include such practices in personnel trainings, per Condition II.L.2.f. of this Permit.
- 7. Intentionally segregated out-throws are not considered to be litter and shall be managed in accordance with conditions set forth is Sections III.C.3, III.I.1.e.ii, III.I.a of this Permit.
- 8. PUC shall document all litter inspections (at both the PUC facility and, when inspected by PUC personnel, at collection facilities) and any complaints received pertaining to litter (at or emanating from the PUC facility and/or a collection facility) and shall retain the records in accordance with Sections IV.B.11 IV.B.14 of this Permit.
- 9. PUC shall notify the CAPS of any complaints of litter, for the PUC facility or at collection facilities, received by PUC in accordance with Sections IV.B.11 IV.B.14 of this Permit.

G. Dust Control

- 1. PUC shall operate its recycling facility in a manner to prevent dust generated from solid waste management activities to migrate beyond the facility boundaries.
- 2. PUC shall visually inspect the entire facility daily for dust emissions and/or

- conditions with the potential to facilitate dust emissions.
- 3. PUC shall implement the following dust mitigation practices, as warranted:
 - a. In-bound and out-bound loads of wastes shall be transported within enclosed vehicles, tarped, and/or otherwise contained.
 - b. Exterior facility driveways and parking areas shall be cleaned or wetted, as necessary.
- 4. In accordance with Sections IV.B.11 IV.B.14 of this Permit, PUC shall maintain detailed records of all dust mitigation practices implemented and of any complaint received pertaining to dust emissions.
- 5. PUC shall notify the CAPS of any complaints of dust received by PUC in accordance with Sections V.C.1.a of this Permit.

H. Odor Control

- 1. PUC shall operate its recycling facility in a manner to prevent the perception of odors generated from solid waste management activities, including accepting, processing, and storing recyclable materials, to migrate outside of the facility boundaries.
- 2. PUC shall inspect the facility daily for odors and/or conditions with the potential to facilitate odor generation.
- 3. The designated POC shall be responsible for correcting malodorous conditions associated with PUC's collection receptacles at the individual collection facility.
 - a. When PUC personnel are present at a collection facility to retrieve and transport collected recyclable wastes, the PUC personnel shall inspect the immediate area of PUC's collection receptacles to determine if odors are being adequately controlled.
 - i. The PUC personnel shall notify their PUC supervisor of the results of said inspection.
 - ii. The PUC personnel shall notify the POC of any deficiencies observed with regard to odor control.
 - b. The PUC personnel shall inquire of the POC whether or not any complaints of malodorous conditions associated with the collection facility have been received.
- 4. PUC shall document all odor inspections (at both the PUC facility and, when inspected by PUC personnel, at collection facilities), any complaints received pertaining to odors emanating from the PUC facility and/or a collection facility, and any subsequent odor mitigation practices implemented, and shall retain the records in accordance with Sections IV.B.11 IV.B.14 of this Permit.
- 5. PUC shall notify the CAPS of any complaints of odors, for the PUC facility or at collection facilities, received by PUC in accordance with Sections V.C.1.a of this Permit.

I. Vectors

- 1. PUC shall operate the recycling facility in a manner to prevent the establishment of habitats for nuisance organisms (such as flies, maggots, roaches, rodents, and similar vermin) and to mitigate nuisances and hazards to public health and the environment.
- 2. PUC shall conduct daily visual and olfactory inspections of the facility for the presence of vectors, nuisance organisms, and any conditions that may contribute to the presence of vectors and nuisance organisms.
- 3. The designated POC shall be responsible for correcting the presence of vectors, nuisance organisms, and any conditions that may contribute to the presence of vectors

and nuisance organisms associated with PUC's collection receptacles at the individual collection facility.

- a. When PUC personnel are present at a collection facility to retrieve and transport collected recyclable wastes, the PUC personnel shall inspect the immediate area of PUC's collection receptacles to determine if vectors are being adequately controlled.
 - i. The PUC personnel shall notify their PUC supervisor of the results of said inspection.
 - ii. The PUC personnel shall notify the POC of any deficiencies observed with regard to vector control.
- b. The PUC personnel shall inquire of the POC whether or not any complaints of vectors associated with the collection facility have been received.
- 4. Any vector(s) encountered or conditions favorable to the establishment of vector habitats shall be legally remedied immediately.
- 5. PUC shall document all vector inspections (at both the PUC facility and, when inspected by PUC personnel, at collection facilities), any complaints received pertaining to vectors at or from the PUC facility and or collection facilities, and all remedies implemented and shall retain the records in accordance with Sections IV.B.11 IV.B.14 of this Permit.
- 6. PUC shall notify the CAPS of any complaints of vectors, for the PUC facility or at collection facilities, received by PUC in accordance with Sections V.C.1.a of this Permit.

J. Health and Safety, and Contingency

- 1. PUC shall implement Health and Safety practices in accordance sufficient to prevent injury, harm, or exposure to PUC personnel and visitors and pursuant to the Occupational Safety and Health Administration's ("OSHA") regulations, guidelines, and standards.
- 2. At a minimum, PUC's use of personal protective equipment shall be in accordance with 29 CFR Part 1910.132.
- 3. PUC shall make first aid equipment immediately available at the site. The readiness of first aid equipment and supplies shall be periodically assessed and addressed, as conditions dictate.
- 4. Personnel responding to emergencies at the facility shall be appropriately trained, per Section II.L.2.b. of this Permit and shall be familiar with the PUC's emergency protocols provided in the approved Plan of Operation.
- 5. PUC shall maintain capability to react to emergencies in accordance with the PUC's emergency protocols provided in the approved Plan of Operation. PUC shall react to spills, fires, accidents, and other emergencies so as to protect human health and safety and the environment.
- 6. PUC shall maintain a current and correct list of emergency coordinators and emergency contact telephone numbers to include nearby ambulance, hospital, police, and fire services. The most current list shall be prominently displayed in multiple areas throughout the PUC facility, as appropriate. All personnel shall be informed of its locations and function.
- 7. PUC shall provide all personnel with health and safety training appropriate for each employee's or volunteer's duties and responsibilities, per Section II.L.2.a. of this

Permit.

- 8. PUC shall document all health and safety training provided to each employee or volunteer and retain the records in accordance with Section IV.C.15. of this Permit.
- Fire Safety
 - a. All materials, including but not limited to incoming waste streams, processed recyclables, out-throws, waste, and material handling equipment fuels shall be managed in a manner to prevent the possibility of fires.
 - b. No smoking shall be permitted in or proximal to areas where flammable or combustible, or potentially flammable or combustible, materials are stored in accordance with applicable fire safety regulations.
 - c. PUC shall include the local fire response agency in fire safety planning efforts so such first responders are familiar with PUC's facility, materials present, and facility operations.
 - d. PUC shall maintain fire suppression equipment in a fully functional condition and in accordance with this Section of this Permit
- 10. PUC shall conduct a Health and Safety inspection of the entire facility at regular intervals to identify any condition(s) with the potential to harm or injure personnel an/or visitors.
 - a. Health and Safety inspections shall be performed at a frequency sufficient to prevent harm or injury to personnel and/or visitors.
 - b. All identified conditions with the potential to harm or injure personnel and/or visitors shall be remedied immediately.
 - c. In the event an identified condition with the potential to harm or injure personnel and/or visitors cannot be remedied immediately; that portion of the facility or operation shall be immediately isolated and/or suspended pending implementation of a remedy to render the identified condition safe.

K. Equipment

PUC intends to manually sort incoming textiles, small household goods, hard toys and shoes into gaylord containers as described in Section III.I.1. Once sorted, PUC will consolidate gaylord containers together by type and into marketable category. In order to do this PUC will utilize a pallet jack and/or an electronic forklift to move volumes of material throughout the facility and on to/off of trucks. PUC will also utilize a scale to calculate and record the weights of materials that are collected or shipped from the Facility.

Operation, Inspection, and Maintenance

- a. PUC shall operate, inspect, and maintain all equipment using adequately trained individuals and in accordance with the manufacturer's recommendations; permits; all applicable local, state, and federal ordinances, laws, and regulations; and this Permit.
- b. PUC shall inspect all equipment prior to equipment start-up and/or at shutdown, as well as at regular intervals adequate to prevent equipment failure and pursuant to manufacturers' recommendations.
- c. PUC shall maintain and operate all equipment in a manner that protects PUC's personnel, the public, and the environment.
- d. PUC shall document all equipment operation, inspection, and maintenance

- training provided to personnel and retain the records in accordance with Section IV.C.15 of this Permit.
- e. PUC shall document all inspections and maintenance of all equipment and retain the records in accordance with Section IV.C.16 of this Permit.

L. <u>Training</u>

- 1. PUC shall provide personnel with training appropriate for each employee's duties and responsibilities within 90 days of hire.
- 2. As job duties dictate, personnel training shall include, but is not limited to:
 - a. Health and safety;
 - b. Emergency response;
 - c. Equipment operation, inspection, and maintenance;
 - d. Prohibited wastes identification;
 - e. Safe and proper handling of prohibited wastes, and;
 - f. Good housekeeping practices.
- 3. PUC shall ensure that all personnel assigned with duties at the facility receive, at a minimum, the required training on an annual basis, if not more frequently.
- 4. PUC shall document all trainings for personnel and retain the records in accordance with Section IV.C.18. of this Permit.

5. Collection Facilities

- a. As per Section II.C.2 of this permit, PUC will work with Collection Facility POC's to provide training which will at a minimum cover:
 - i. Identification of acceptable materials for donation.
 - ii. Process for contacting PUC to have full containers emptied.
- iii. Process to ensure that litter and other vectors are identified and minimized/eliminated.
- iv. Process to have a container removed if the Collection facility decides to cancel their contract with PUC.
- b. PUC shall create a training packet, reviewed and approved by the Department, within 30 days of the issue date of this Permit, which once approved, must be distributed and acknowledged by all existing and future collection POC's.
- c. PUC shall not place its collection receptacles at a collection facility until the POC has received and acknowledged the training packet.
- d. PUC shall, at a minimum, annually host a refresher training to all collection facility POCs in order to prevent non-compliance with the conditions of this Permit, the DRGSW, and 7 Del. C. Chapter 60
- e. Additionally, PUC shall monitor sites and when POCs change and a new individual presentation and acknowledgement of the training must be signed in order to prevent non-compliance with the conditions of this Permit, the DRGSW, and 7 Del. C. Chapter 60

III.OPERATIONS:

A. General

- 1. PUC shall conduct its operations in accordance with all federal, state, county, and municipal statutes, ordinances, and regulations.
- 2. PUC shall conduct its operations in accordance with this Permit and the Permit

- application materials, including the Plan of Operation dated November 7, 2022.
- 3. Operations shall be conducted in a manner protective of public health and the environment.

B. Capacity

- 1. PUC shall not accept more than 4.8 tons of wastes per day and no more than 160 tons within the building.
- 2. Collection facilities are limited in their size and should be serviced as soon as possible after PUC has been contacted that a pickup is needed.

C. Waste Handling

- 1. In-bound textiles, household goods, hard toys and shoes shall be delivered to the PUC facility located at 132 Sandy Drive using the loading facilities.
- 2. All waste handling, management, and processing activities shall be performed within the PUC facility building. No processing or management will occur outside the building.
- 3. PUC shall manage out-throws and other wastes using onsite disposal services under contract with a permitted solid waste hauler.
- 4. Prohibited wastes shall be rejected by PUC and the organization delivering them shall be responsible for managing them appropriately.

D. Feedstocks and Feedstock Sources

- 1. PUC intends to source textiles, small household goods, hard toys and shoes from:
 - a. Properly contracted and trained collection facilities located throughout the State that allow PUC to host a collection receptacle at their location, and;
 - b. Donations of textiles, small household items, hard toys and shoes from residents delivered directly to the PUC facility.

2. Collection Facilities

- a. Collection facilities are schools, libraries, churches, and other similar community organizations who have contracted with PUC to host collection receptacles at their property or site.
- b. PUC shall register PHOs as collection facilities pursuant to Sections II.C.2.c. and II.C.2.e. of this Permit.
- c. Collection bins placed onsite by PUC will be labelled with identification as well as a signage which conforms to the list of items outlined below:
 - a) Acceptable wastes;
 - b) Prohibited wastes, and;
 - c) PUC/PHO Contact information (e.g. phone number) to report issues.
- d. Based on the contract with the site, PUC can locate one (1) or more receptacles at each partner site.
- e. PUC will communicate regularly with PHO's and ensure that they dispatch personnel as soon as needed to empty collection receptacles. During collection PUC personnel shall:
 - i. Inspect the immediate area of the collection receptacles at collection facilities for litter, odors, and vectors pursuant to Sections II.F.2.a, II.H.3.a, and II.I.3.a. of this Permit.
 - ii. Inquire of the POC any information pertaining to complaints of or corrective actions associated with litter, odors, and vectors pursuant to Sections II.F.2.b,

- II.H.3.b, and II.I.3.b. of this Permit.
- iii. PUC personnel shall determine if prohibited, especially liquid, wastes have accumulated in or around the collection receptacles.
- iv. In accordance with Section III.G.5 of this Permit, PUC personnel shall visually and olfactorily inspect the area around the receptacle and shall reject inform the POC that the material cannot be picked up due to contamination.

3. Hand-Delivered Donations

- a. Donations of textiles, small household goods, hard toys and shoes by random unknown and unidentified private individuals is acceptable during the business hours outlined in Section II.B.1 of this permit by PUC personnel.
- b. Any donations that are received at PUC shall be inspected and weighed. Prohibited wastes and other non-acceptable materials shall be rejected by PUC and the individual must take them offsite for proper disposal.

E. Acceptable Wastes

- 1. The wastes PUC may accept are strictly limited to:
 - a. Post-consumer source-separated textiles including but not limited to clothing, sheets, blankets, bedding, yarns, and fabrics;
 - b. Small household items, including but not limited to utensils, pots and pans, small appliances, and dishes;
 - c. Hard toys;
 - d. Shoes;
 - e. Other similar items approved by the Department in writing prior to acceptance of such wastes.
- 2. PUC shall only accept wastes delivered to the PUC facility:
 - a. As a direct donation from random unknown unidentified private individuals;
 - b. By commercial vehicles with a valid Delaware general solid waste transporter permit, or;
 - c. Via a method of transport that does not require licensing, insuring, or permitting, such as "on foot" or by non-motorized bicycle.

F. Prohibited Wastes

- 1. PUC shall visually and olfactorily inspect wastes to be delivered to the facility and exercise reasonable care to ascertain whether said wastes are or contain prohibited waste(s), and shall not accept or shall segregate prohibited wastes including, but not limited to:
 - a. Municipal solid waste, other than the items outlined in Section III E.1 of this

permit;

- b. Food waste;
- c. Construction and demolition debris;
- d. Yard waste;
- e. Electronic waste;
- f. Universal waste;
- g. Infectious waste;
- h. Liquid waste;
- i. Sanitary waste;
- i. Radioactive waste;
- k. Household hazardous waste;
- 1. Hazardous waste, as defined in Delaware's Regulations Governing Hazardous Waste:
- m. Asbestos-containing material (ACM);
- n. Mixed wastes where incidental unacceptable wastes exceed ten percent (10%) by volume of the total quantity by visual estimate;
- o. Any waste transported by any non-permitted commercial hauler, by any commercial hauler whose permit is expired or not currently valid, or by any commercial hauler whose permit is not endorsed for general solid waste;
- p. Any waste which cannot be definitively determined to be an acceptable waste in accordance with Condition III.E. of this Permit;
- q. Any waste, whether otherwise acceptable or not, which was left outside at the PUC facility rather than:
 - i. Donated via hand-delivery;
- r. Delivered into the PUC facility from a collection facility by PUC personnel or a Delaware permitted solid waste transporter, and;
- s. Any waste, whether otherwise acceptable or not, which was left exterior to a collection receptacle at a collection facility, rather than placed into the collection receptacle.
- 2. Reasonable care shall include rejection of any waste that cannot be definitively determined to be an acceptable waste, as defined in Condition III.E. of this Permit
- 3. Prohibited wastes shall:
 - a. If identified prior to acceptance:
 - i. Be immediately rejected;
 - ii. Not be accepted, and;
 - iii. Be immediately returned to the collection facility or donator for proper management, which may require immediate action.
 - b. If identified after acceptance, be:
 - i. Handled appropriately by trained personnel only;
 - ii. Segregated from the delivery/load immediately;
 - iii. Managed lawfully, and;
 - iv. Removed, lawfully, from the site within 72 hours of receipt and/or acceptance.
- 4. PUC shall provide training to its personnel and collection facility personnel in the identification of the types of prohibited wastes and appropriate response actions per Conditions II.L.2.d and II.L.2.e of this Permit.
- 5. PUC shall respond to prohibited wastes incidents in accordance with the conditions of

this Permit and in a manner protective of human health and the environment.

- a. Municipal solid waste, excluding recyclable wastes, and food waste shall be appropriately containerized pending transportation off-site for proper disposal.
- b. For (suspected) construction and demolition debris, yard waste, electronic waste, universal waste, and household hazardous waste; contact:
 - i. CAPS at (302) 739-9403 during regular business hours.
 - ii. Note that universal wastes that are no longer intact are hazardous wastes.
- c. For (suspected) infectious waste, liquid waste, sanitary waste, radioactive waste, hazardous waste, and/or ACM; contact:
 - i. The CAPS at (302) 739-9403 during regular business hours, or;
 - ii. Environmental Emergency Hotline at (800) 662-8802 after business hours.
- iii. Note that universal wastes that are no longer intact are hazardous wastes.
- d. Additional resources:
 - i. DSWA's Citizens' Response Line at (800) 404-7080.
 - ii. For ACM, DAQ's Asbestos Management Program at (302) 323-4542.
- iii. For illegal dumping, Environmental Crimes Unit ("ECU") at (800) 662-8802.
- iv. For (uncontrolled) releases or spills, Environmental Emergency Hotline at (800) 662-8802.
- 6. PUC shall notify the CAPS of all prohibited wastes delivered to the facility in accordance with Sections V.A, V.B, or V.C of this Permit, as appropriate.
- 7. PUC shall document the type and quantity of all identified prohibited wastes, to include the location where the identification occurred (at the collection facility or at PUC's facility) and the PUC personnel who retrieved said waste(s) from the collection facility.
- 8. PUC shall contact the collection facility from which the prohibited waste originated to explain that identification of prohibited wastes in future collected accumulations originating from the particular collection facility may result in removal of PUC's collection receptacles from the collection facility.

G. Waste Inspection

- 1. Waste inspection is the process by which a quantity or accumulation of wastes offered for processing to the PUC facility are visually and olfactorily evaluated to identify prohibited wastes.
- 2. Waste inspection shall be performed only by appropriately trained PUC personnel.
- 3. Waste inspection may be performed prior to or after waste acceptance.
 - a. PUC shall expend every practical effort to visually and olfactorily inspect waste prior to acceptance.
- 4. Inspection and sorting of delivered wastes shall be performed within the PUC facility building.
- 5. Quantities of wastes accumulated at collection facilities shall be visually and olfactorily inspected for prohibited wastes by appropriately trained PUC personnel at the collection facility prior to loading the accumulated wastes for transport to the PUC facility.
 - a. Identified prohibited wastes shall be immediately rejected and returned to the collection facility for proper handling and management.
 - b. Prohibited wastes identified at a collection facility shall not be transported to the

PUC facility.

- 6. Quantities of wastes attempting to be hand-delivered by unknown unidentified private individuals shall be visually and olfactorily inspected for prohibited wastes immediately upon the attempted delivery and prior to accepting said wastes.
 - a. PUC shall request that the donating individual remain present in the PUC facility building until an inspection of the donated waste has been executed.
 - b. When prohibited wastes are identified in a quantity of wastes that are being donated, PUC shall not accept the prohibited waste.
 - c. Identified prohibited wastes shall be immediately rejected and returned to the unknown unidentified private individual attempting donation for proper handling and management.
- 7. Quantities of recyclable wastes transported to the PUC facility from a collection facility shall be visually and olfactorily inspected for prohibited wastes expeditiously upon delivery.
- 8. When prohibited wastes are identified in a quantity of wastes transported to the PUC facility from a collection facility, PUC shall accept and appropriately segregate the prohibited waste, then manage it pursuant to Condition III.F.3.b of this Permit.

H. Waste Acceptance

- 1. Waste acceptance is the point in time and space when and where a waste becomes the regulatory and legal responsibility of PUC to manage appropriately henceforth.
 - a. For wastes sourced from collection facilities, waste acceptance occurs when PUC's personnel loads the accumulated wastes into their vehicle for transport to the PUC facility.
 - b. For donations of wastes hand-delivered to the PUC facility, waste acceptance occurs after PUC has inspected and accepted the waste, allowing the donator to leave the facility with any prohibited wastes that PUC rejected.
- 2. Receipt of wastes at the PUC facility shall be pursuant to Sections III.D.1, III.D.2, and III.D.3 of this Permit.
- 3. All incoming waste, rejected waste, produced product, and outgoing waste shall be weighed and recorded.
 - a. All incoming and outgoing loads of wastes shall be weighed by properly trained PUC personnel utilizing a calibrated scale.
 - b. PUC shall retain all records of the weights of each delivery/load of incoming waste, rejected waste, and outgoing waste in accordance with Sections IV.B.3 through IV.B.10 of this Permit.
- 4. PUC shall not exceed the capacity established by Condition III.B.1 of this Permit.
 - a. In the event wastes in excess of the tonnage limit are accepted, PUC shall notify the CAPS in accordance with Section V.C of this Permit and provide a plan of action to get back within the limits of the permit.
- 5. Each delivery of wastes shall be visually and olfactorily inspected by properly trained PUC personnel for prohibited wastes expeditiously upon receipt pursuant to III.G.
 - a. Prohibited wastes shall be immediately segregated from the load, lawfully managed, and lawfully removed from the site within 72 hours of receipt and/or acceptance.
 - b. PUC shall address all prohibited wastes in accordance with Section III.F.3, II.F.5,

and II.F.6 of this Permit.

I. Waste Processing

Accepted textiles, small household goods, hard toys and shoes shall be sorted, containerized, and stored in gaylord containers not to exceed the limits outlined in Section III.B and III.J of this Permit.

a. Out-throws

- i. Ultimately, the sorting process(es) shall result in accumulations of recyclable materials to be sold to the market and unprocessable or unsuitable out-throws.
- ii. Out-throws will likely consist of, but are not limited to:
 - 1) Wastes unsuitable for further processing;
 - a) Textiles/Shoes that do not meet various marketing standards;
 - b) Textiles/Shoes that are unsuitable for reuse/recycling;
 - c) Small household items/hard toys that are unsuitable for reuse/recycling;
 - 2) Prohibited wastes per Section III.F.1. of this Permit, or;
 - 3) Contaminants.
 - a) Foreign objects which are able to be separated from the acceptable, suitable, and processable wastes.
- iii. Once segregated, out-throws shall be weighed and the daily total weight recorded in accordance with Section IV.7 of this Permit.
- iv. Out-throws shall be managed pursuant to Sections III.C.4 of this Permit.
- v. Landfill-bound out-throws shall be placed in the appropriate dumpster and serviced by a permitted Delaware Solid Waste transporter within 72 hours of the appropriate receptacle reaching capacity, or at the Department's request.
- vi. PUC shall calculate a monthly out-throw rate on the first operating day of each month for the preceding calendar month.
- vii. PUC shall calculate their out-throw rate as follows:

$$\left(\frac{W_{OT}}{W_{AT}}\right) \times 100 = OTR$$
, as a percentage

Where: WOT = total weight of out-throws; WA,T = total weight of accepted wastes, and; OTR = out-throw rate percentage.

- b. The total weight of out-throws (WOT) shall include:
 - All wastes deemed unsuitable for processing which were sorted out of and segregated, for the purpose of off-site disposal or off-site recycling, from accepted wastes sourced from either collection facilities and/or donated directly to PUC.
- c. The total weight of out-throws (WOT) shall not include:
 - i. Any prohibited wastes rejected at the collection facility and returned to the collection facility for proper handling and management:
 - ii. Any prohibited wastes refused for acceptance at the PUC facility;
- iii. Any wastes generated on-site not suitable for PUC's recycling process, for

example office paper, coffee grounds, and/or other office recyclables;

- d. The total weight of accepted wastes (WA,T) shall include:
 - i. All accepted wastes from collection facilities, and;
 - ii. All wastes hand delivered by the Public.
- 2. PUC shall not exceed a 15% out-throw rate.
- 1. In the event PUC does exceed the 15% out-throw rate limit, PUC shall notify the CAPS pursuant to Section V.E.1 of this Permit.

J. Storage Limits

At any given time, PUC shall store a maximum of a combined total of 160 tons of unprocessed and processed recyclable wastes. Any landfill-bound out-throws shall be accumulated in appropriate receptacles located exterior to the PUC facility building.

K. Time

- 1. PUC shall utilize an inventory control system, to be implemented within 30 days from the effective date of this Permit, which enables PUC to determine the length of time all recyclable wastes have been present at the PUC facility.
- 2. Putrescible out-throws shall be stored at the facility for a maximum of 72 hours or if the Department requests a different frequency.
- 3. All processed wastes shall be stored at the facility for a maximum of 90 days. If a longer time frame is required, PUC must contact the Department with the request and justification for a decision to expand the time frame.

4. Non-Compliance with Established Limits

- 5. In the event PUC fails to comply with the limits established herein, either purposely or inadvertently, and prior to implementing any of the provided corrective actions, PUC shall notify the Department in accordance with Sections V.A.1 of this Permit, as appropriate.
- 6. If PUC's ability to market materials pushes the facility over its permitted limit of 160 tons, PUC will immediately cease accepting new material and provide the Department with a plan that outlines how PUC will remove excess inventory to get below permitted limits and be able to recommence accepting material for processing.

L. Operational Inspections

- 1. PUC shall perform the following inspections on a daily basis in accordance with Conditions II.F.1, II.G.2, II.H.2, and II.I.2 of this Permit, respectively:
- 2. Litter;
- 3. Dust:
- 4. Odors, and;
- 5. Vectors.
- 6. PUC shall inspect all equipment, in accordance with Condition II.K of this Permit.

- 7. PUC shall conduct a Health and Safety inspection of the entire facility at regular intervals to identify any condition(s) with the potential to harm or injure personnel and/or visitors, pursuant to Condition II.J.10 of this Permit.
- 8. When at collection facilities, PUC personnel shall inspect collection facilities for:
- 9. Litter;
- 10. Odors, and;
- 11. Vectors;
 - i. Pursuant to Conditions II.F.2.a, II.H.3.a, and II.I.3.a of this Permit.
- 12. When at collection facilities, PUC personnel shall inspect collection receptacles for accumulations of prohibited, especially liquid, wastes per Condition III.D.2.iii of this Permit.

IV. RECORDKEEPING:

- A. PUC shall record the information required by Section IV.B of this Permit, respectively. The records shall be kept onsite for a period of three (3) years and shall be made immediately available to the Department for review upon request.
- B. PUC shall maintain the following written records:
 - 1. Agreements between PUC and PHO's;
 - 2. Acknowledgement of PHO training forms;
 - 3. Daily waste collection records documenting the weight and types of wastes retrieved from each collection facility or donated directly to the PUC facility.
 - a. When prohibited wastes are rejected at and returned to the collection facility, daily waste collection records shall provide a general description and an approximate quantity of the rejected and returned waste.
 - b. When prohibited wastes are rejected and returned to random unknown unidentified private donors, a description and estimated quantity of the prohibited waste is not required in the daily waste collection records.
 - 4. Daily waste acceptance records to include type and total weight of wastes accepted by the PUC facility.
 - 5. Daily out-throw generation records to include weight and percentage of out-throws, as outlined in Section III.I.a of this Permit. Landfill bound out throws should be tracked separately to show the destination of material.
 - 6. Daily recyclable wastes "disposal" records to include the weight of each out-bound shipment of wastes with the corresponding name(s) and address(es) of the receiving market facility(ies).
 - 7. Daily prohibited and rejected wastes records to include weight of prohibited and/or rejected wastes, generator or source of the prohibited/rejected waste, the reason for rejection, type and/or description of prohibited/rejected waste, disposition of the prohibited/rejected waste with name and address of the receiving facility, name of transporter utilized to remove the prohibited rejected waste and corresponding Transporter Permit/Identification Number, and any supplemental documentation required due to type of prohibited waste (e.g. hazardous waste manifest).
 - 8. As applicable, transporters (company name, address, telephone number, solid waste transporter number, number of loads delivered and/or removed, weight of each load delivered and/or removed, generator and/or recipient of each load delivered and/or

- removed, and content of each load delivered and/or removed) delivering recyclable waste materials to the facility or removing solid wastes from the facility.
- 9. Scale calibrations / re-calibrations, certifications / re-certifications, and verification checks.
- 10. Daily inventory control records for the total weight of all wastes and products on-site, out-throws; and materials handling equipment fuels.
- 11. All daily litter, dust, odor, and vector inspections performed at the PUC facility.
- 12. Any litter, dust, odor, or vector complaints received by PUC concerning the facility.
- 13. Any litter, odor, or vector complaints pertaining to PUC's collection facilities.
- 14. All litter, dust, odor, and/or vector mitigation activities implemented at either the PUC facility or at any of PUC's collection facilities, to include date and time of implementation, method of mitigation, and any contracted mitigation services.
- 15. All training provided to personnel including that provided to collection facilities.
- 16. All operational inspections and all equipment inspections and maintenance.
- 17. Lease termination, all lease violations, all lease renewals, and all lease modifications.
- 18. Information sufficient to meet the requirements of Section V of this Permit of all incidents and emergencies.

V. NOTIFICATION AND REPORTING

A. Incidental Notification and Reporting

- 1. PUC shall notify the CAPS of all incidents and emergencies.
 - a. PUC and its collection facilities shall take immediate reasonable action to correct or remedy all incidents and emergencies in order to ensure human health and protect the environment.

B. Emergency Incidents

- 1. PUC and its collection facilities shall *immediately* notify the CAPS by telephone at (302) 739-9403 (or, if after business hours, the Environmental Emergency toll-free hotline at 1-800-662-8802) in the event of:
- 2. An emergency including, but not limited to, fire, explosion, spill, or unintentional or unpermitted release, on-site vehicle accident resulting in personal injury or property damage sufficient to threaten site operations, injury requiring hospitalization, occupational exposures to personnel, facility evacuation, and natural disaster.
- 3. Any facility shutdown resulting from an emergency, per Section V.A.1 of this Permit.
- 4. Receipt of suspected asbestos-containing, infectious, liquid, sanitary, radioactive, or hazardous prohibited wastes at the facility.

C. Non-Emergency Incidents

- 1. PUC shall notify the CAPS by telephone at (302) 739-9403 or by e-mail within 24 hours or the following business day in the event of:
 - a. Complaints pertaining to litter, dust, odors, or vectors originating from the PUC

- facility or its collection facilities.
- b. Receipt at the facility of the following prohibited wastes:
- c. Municipal solid wastes;
- d. Construction and demolition wastes;
- e. Electronic waste;
- f. Universal waste, and;
- g. Wastes delivered by unpermitted or inappropriately permitted transporters.
- 2. Any sudden or unanticipated facility shutdown not resulting from an emergency, per Section V.A.1 of this Permit, that results in solid waste being diverted from the facility.
- 3. Lease termination, any violation of the lease agreement, or any lease modification with the potential to cause a deviation from the approved Plan of Operation or changes to facility operations.
- 4. Facility changes including, but not limited to, changes in the company ownership, company name, company officials, management staff, and operators, as well as changes to POC.
- 5. Any exceedance of any limit established herein, excluding the 15% out-throw limit (See Section V.E of this Permit).
- 6. Any failure to comply with any condition of this Permit.
- D. PUC shall submit a detailed written notification by either e-mail or hardcopy to be received by the CAPS no later than five (5) business days following any incident, emergency or otherwise, as listed in Sections V.B and V.C of this Permit. The notification shall include the following.
 - 1. Date and time of occurrence/discovery.
 - 2. Date and time reported to the Department. Include a reference number if reported to the Environmental Emergency hotline. When applicable, reports required to be submitted to the Department per Delaware's "Reporting of a Discharge of a Pollutant of Air Contaminant" regulations are in addition to and not in lieu of those herein.
 - 3. For spills or releases, materials, quantities, and area involved.
 - 4. A sketch of the scene of the incident, showing location and approximate dimensions.
 - 5. List of agencies notified.
 - 6. Narrative describing how the incident occurred and actions taken by PUC and other response personnel, as applicable, to remedy the situation.
 - 7. Report of injuries and/or damage.
 - 8. Delaware solid waste transporter number if the incident involves a permitted transporter.
 - 9. In the event of a complaint, name, address, and phone number of the person making the complaint, as well as the content of the complaint.
 - 10. Proposal for follow-up remedial actions including a schedule for implementation.
 - 11. Any additional information seemingly relevant or material to the incident.

E. Out-Throw Limit

1. In the event the monthly out-throw percentage exceeds the 15% limit established by Condition III.I.2 of this Permit, PUC shall notify the CAPS in writing, by either email or hardcopy, to be received no later than the 15th day of the following month

- and shall include an explanation for the exceedance as well as corrective actions to be taken to prevent the exceedance in the future.
- 2. PUC shall document and retain the records of all incidents, whether an emergency or otherwise, in accordance with Section IV of this Permit sufficient to meet the notification and reporting requirements stipulated in Section V of this Permit.

F. Quarterly Reporting

PUC shall submit quarterly reports to the CAPS via e-mail or in hardcopy no later than the 15th day of the month following the end of the quarter (1st quarter report is due by April 15th, 2nd quarter report is due by July 15th, 3rd quarter report is due by October 15th, and 4th quarter report is due by January 15th). The quarterly reports shall summarize operations for the previous quarter and include the following information for the applicable quarter (information shall be presented in a tabular format, as appropriate):

- 1. A list of current collection facilities to include the name and address of each collection facility;
- 2. A list of collections/deliveries by collection facility to include dates of collection/delivery, corresponding number of receptacles, corresponding total weight of accepted waste, and a description and estimated quantity of any rejected prohibited wastes returned to the collection facility.
- 3. Total weight of wastes accepted at the facility each operating day.
- 4. Total aggregated weight of wastes sourced from collection facilities.
- 5. Total aggregated weight of wastes donated directly to the PUC facility.
- 6. Total weekly weight of prohibited wastes rejected from accepted waste streams.
- 7. A list, by collection facility, of prohibited wastes segregated at the PUC facility from wastes accepted from collection facilities to include a description and weight of the prohibited wastes.
- 8. Daily weight of landfill-bound out-throws disposed into the proper onsite disposal container.
- 9. Daily total of all waste and product stored, excluding landfill-bound out-throws.
- 10. Summary of the percentage of out-throws generated each month.
- 11. Summary of all notifications made to the CAPS or incidents requiring notification per Section V.A of this Permit, whether notification was made as required or not.
- 12. A detailed description of any deviations, whether intentional or accidental, from the approved Plan of Operation.
- 13. Summary of all instances of non-compliance with this Permit.

G. Annual Reporting

- 1. Annual Recycling Facility Report
 - a. No later than March 1st of every year, PUC shall submit an annual report to the CAPS. This annual report shall summarize operations for the previous calendar year and include the following information (information shall be presented in a tabular format, as appropriate).
 - b. A list of all sites which partnered with PUC as a collection facility at any time throughout the reporting year to include the name and address of the collection facility, the date range of partnership, the corresponding annual total weight of accepted wastes, and the corresponding total weight of prohibited wastes

delivered to the PUC facility.

- c. Total annual weight of wastes accepted at the facility.
- d. Total aggregated annual weight of wastes sourced from collection facilities.
- e. Total aggregated annual weight of waste donated directly to the PUC facility.
- f. Total annual weight of prohibited wastes accepted at the PUC facility.
- g. Total weight of out-throws and other wastes sent off-site for disposal.
- h. Summary of the percentage of out-throws generated each month.
- i. A detailed discussion of the feasibility of recycling materials currently being received by the facility but that are not being recycled.
- j. A summary of all shutdowns, fires, explosions, spills, non-permitted or uncontrolled releases, or other emergencies that occurred at the facility.
- k. A summary of all deviations, whether unintentional or not, from the approved Plan of Operation.
- 1. A detailed description of all construction or corrective work conducted at the site.
- m. A summary of all instances of non-compliance with this Permit

H. Financial Assurance

No later than December 31st of every year, PUC shall submit an updated financial assurance document, as required in DRGSW Section 4.1.11. The submittal shall also include an updated estimate of the cost of third-party closure of the facility that has been adjusted for inflation. If the Department determines at any time that current financial assurance is inadequate for the site's current actual conditions, the Department reserves the right to require an increase in financial assurance in order to assure PUC's compliance with DRGSW 4.1.11.2.1.

I. Annual Recycling Report

In accordance with the Universal Recycling Law, specifically 7 Del. C. § 6056(1), PUC shall submit an annual report detailing recycling activities no later than February 15th of every year. The report shall follow the reporting guidelines developed by the Department and the Recycling Public Advisory Council.

J. Written notifications and reports, excluding the Annual Recycling Report (Section V.C.3.), shall be submitted via e-mail or regular mail, as specified above, to:

Adam Schlachter

Delaware Department of Natural Resources and Environmental Control
Waste and Hazardous Substances Division
Compliance and Permitting Section
89 Kings Highway
Dover, DE 19901

Email: adam.schlachter@delaware.gov

VI. CLOSURE

A. At least 180 days prior to the date when recyclable waste materials will no longer be accepted, PUC shall submit the following for the Department's approval:

- 1. Written notification of PUC's intent to close the facility;
- 2. An updated closure plan, including a detailed description of the methods, procedures, and processes to be used to clean and close the facility;

3/2/2023

- 3. An updated estimate of the third party cost of closing the facility, and;
- 4. The closure schedule.

B. Closure of the facility shall meet the closure requirements set forth in DRGSW.

Jason W. Sunde

Environmental Program Administrator Compliance and Permitting Section

ADS:emw ADS:23001.doc Phoenix Used Clothing Permit SW-23/01

PERMIT MODIFICATION SYNOPSIS

Initial Permit issued for two (2) years due to PUC being a new facility to Delaware.

Site Map
Phoenix Used Clothing
132 Sandy Drive, Newark, DE 19713

