



DEPARTMENT OF PUBLIC WORKS
187-A OLD CHURCHMANS ROAD
NEW CASTLE, DE 19720
(302) 395-5700

January 23, 2024

DNREC
Office of the Secretary
Attn: Lisa Vest
89 Kings Highway
Dover, DE 19901

DNRECHearingComments@delaware.gov

**Re: DNREC Docket #2023-P-WH-0028,
Scrap Tire Solution, Inc. (STS)
Solid Waste Facility Permit Application – 195 Hay Road, Wilmington**

Dear Ms. Vest:

New Castle County Department of Public Works (“Public Works”) has reviewed the Solid Waste Facility Permit application (“Application”) and related documents posted on DNREC’s website for Scrap Tire Solution, Inc.’s proposed scrap tire recycling facility (“Facility”) at 195 Hay Road in Wilmington (“Site”). The Plan of Operation included with the Application briefly mentions a sewer pumping station located south of the Site. The sewer pumping station referenced is New Castle County’s Edgemoor Pump Station (“Pump Station”), a major County sewer asset. This Pump Station is a critical component in the County’s wastewater collection and transmission system, and its continuous uninterrupted operation is essential for public health. Just as critical is the County’s 66-inch Force Main (“Force Main”) that appears to run underneath part of the proposed Scrap Tire Area depicted in STS’s Plan of Operation. It is imperative that the Pump Station and Force Main never sustain any damage from fire, storage of materials or operation of heavy equipment. Both must always remain easily accessible in the event an emergency repair is required. With that background, Public Works offers the following comments, questions and concerns:

- The Site Plan included with the Application depicts other areas besides the Scrap Tire Area. For example, there is the Junk Vehicle Holding Area and Trash Authority Area. Besides the Scrap Tire Area, what areas on the Site Plan will be utilized by STS for its operation? The Recycling Permit Application states that the Total Site Area is 6.19 acres, but the Expected Service Area is listed as being approximately 1 acre for STS with 2.55 acres to be shared among several entities.

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NCC Comments on DNREC Docket #2023-P-WH-0028

- Is there a fire prevention and/or response plan for the Scrap Tire Area? How will a potential fire be contained so that it does not spread to the adjacent Pump Station?
- It is unclear from the Application what will occur within the confines of the Scrap Tire Area. Section 3.4.1.4 in the Plan of Operation states that "...the Site will accommodate approximately 20, 53-foot trailers for storage of both unprocessed and baled tires. Each container of baled product is estimated to hold about 2,000 tires. Container capacity of unbaled tires is approximately 1,000 tires." Will these trailers all be located within the Scrap Tire Area?
- As stated above, the proposed Scrap Tire Area appears to be located above the County's 66-inch sanitary sewer Force Main and within the County's 30-foot easement area for the Force Main. Please see the attached Record Minor Subdivision Plan for the Edgemoor Road Pump Station. The Force Main must remain protected and easily accessible at all times should an emergency arise. This will not be the case if there are twenty containers of tires located on top of the Force Main.
- Has there been any analysis to determine the affect the weight of the containers, bailing equipment and heavy equipment traffic will have on the Force Main below?

Without additional information, the County cannot support the location of the Scrap Tire Area bordering the Pump Station parcel and over the Force Main. If you have any questions, please do not hesitate to contact me at (302) 395-5780.

Very truly yours,



Jason P. Zern, P.E.
Senior Manager

cc: Robert Roff, Sewer Services Manager
Regis Yurcich, Chief of Facility Maintenance

