



August 1, 2022

LETTER SENT VIA EMAIL ONLY

Mylanda Jacobsen
ENCINA
Global Purchasing Director, Plastics
1095 Evergreen Circle, Suite 510
Woodlands, TX 77380

Re: Encina Development Group, LLC
Advanced Recycling Facility
APS ID #1046278, AUTH ID #136546
Point Township, Northumberland County

Dear Ms. Jacobsen:

Thank you for the letter dated July 5, 2022, which was submitted by All 4 on behalf of Encina Development Group, LLC (Encina).

Based upon the information provided to the Department of Environmental Protection (Department), your proposed facility meets the definition of an “Advanced Recycling Facility” per the Solid Waste Management Act (SWMA), 35 P.S. §§ 6018.101—6018.1001. Please be advised that in order to continue to meet this definition, the materials that you receive at your facility shall originate from residential, municipal or commercial sources, and may include source-separated recyclable plastics from a materials recycling facilities (MRFs), that are not mixed with solid waste, municipal waste, residual waste, regulated medical and chemotherapeutic waste, hazardous waste, electronic waste, waste tires or construction or demolition waste. Under the SWMA, an Advanced Recycling Facility cannot receive residual waste.

We appreciate the breakdown of materials you expect to receive. The Department has evaluated these materials and have concerns that the expanded polystyrene logs, polypropylene super sacks, and the industrial high impact polystyrene may be indicative of material that could be originating from residual waste sources. Some consolidation programs collect from both municipal and residual sources. If Encina chooses to accept these types of materials, please be aware of the origin to avoid residual wastes.

In order to receive residual waste material to conduct “advanced recycling,” Encina would need to apply for and obtain a permit from the Department’s Bureau of Waste Management, as residual waste does not meet the definition of a “post-use polymer” and, as a result, Encina would no longer meet the definition of an “advanced recycling facility.”

Additionally, in Pennsylvania, scrap yards, which are listed as a potential source of feedstock material for the proposed facility, are considered to be residual waste generators.

Please note that the current exemption that applies to Encina for obtaining a permit under the SWMA does not apply to other permits that may need to be obtained from other Department Programs.

If you have any questions about operating as an Advanced Recycling Facility or the requirements of the SWMA please contact me at 570.327.3752 or via email at lhouser@pa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Lisa D. Houser".

Lisa D. Houser, P.E.
Environmental Engineer Manager
Waste Management

cc: Northumberland County
Point Township
Field
File