

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Region 7 Main Office

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May 20, 2020

Via E-mail (Danish@smccrecycling.com) and US Mail

Mr. Danish Mir
SungEel MCC Americas, LLC
222 Bloomingdale Road
White Plains, New York 10603

RE: DEC Permit No. 7-0346-00218/00001
SMCC LIB Recycling Facility/PFAS Emissions

Dear Mr. Mir:

This letter is in regard to the subject air state facility (ASF) permit issued on March 30, 2020 for a battery recycling facility in Endicott, NY. As you are aware, NYSDEC recently became aware that some lithium ion batteries contain some amount of per and/or poly fluoroalkyl substances (PFAS). In addition, there is evidence that any PFAS compounds present in the batteries could result in PFAS emissions at the temperature that the Rotary Kiln Dryer operates. SMCC has indicated that the air pollution control equipment for the project, particularly the afterburner, may serve to control PFAS emission in the exhaust if operated under certain conditions.

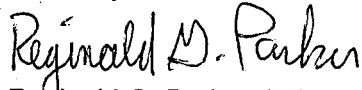
Based on this new information, DEC has concluded that a modification to SMCC's ASF permit is required to process any lithium ion batteries containing PFAS compounds at the facility since this was not part of the original permit application prepared by SMCC. The application for modification of SMCC's ASF permit must include an estimation of PFAS emissions both prior to and after air pollution control. This should be based on information from battery manufacturers regarding the PFAS content of batteries to be processed at the facility, and documentation supporting the degree of air pollution control for PFAS emissions. Please note that a permit modification will need to go through public review and comment, limited to new information in the application and the modified portions of permit.

Alternatively, if SMCC intends to only accept batteries that do not contain PFAS compounds, DEC will require that SMCC provide a certification from each manufacturer of batteries that will be processed at this facility confirming there are no PFAS present in said battery models. To be able to operate under the current permit, SMCC must demonstrate how it will track and verify that batteries received at the facility are only those certified by manufacturers as not containing PFAS.

Please provide a response to this letter no later than June 1st, 2020 indicating how SMCC will proceed on this issue. Please include in the response a schedule for either submitting an ASF permit modification application, or a schedule for providing manufacturer certifications to DEC.

If you have any questions on this, please contact me at 315-426-7420.

Sincerely,



Reginald G. Parker, PE
Regional Engineer
NYSDEC Region 7

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