



DNREC Virtual Public Hearing

On the Application and Draft Air Permit to Install a 12,000 Gallon Drumming Tank at Croda, Inc. (Docket #2020-P-A-0018)

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DIAL-in Number: 1-408-418-9388
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No comments will be taken in person during this hearing. Comments will be accepted using the DNREC comment form, via email, or by USPS mail as noted on the hearing event page (de.gov/dnrechearings)

DNREC Public Hearing

Croda, Inc.

Air Permit Application and Draft Permit to Install a 12,000 Gallon Drumming Tank

July 21st, 2020



Department of Natural Resources and Environmental Control

Division of Air Quality

Engineering and Compliance Section

DAQ Permitting Process

- Major source permitting requirements for Croda
 - Major source for nitrogen oxides (NO_x) and carbon monoxide (CO)
 - Synthetic Minor Source for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs)
 - Facility has taken federally enforceable operating restrictions to limit emissions below the major source thresholds

Major Source Thresholds

MAJOR SOURCE THRESHOLD (TONS)							
	NO _x	CO	VOC	SO ₂	PM ₁₀	HAPs	Other Air Pollutants
New Castle County	25	100	25	100	100	10/25	100

For HAPs the limits are 10 tons of a single HAP or 25 tons of combined HAPs

DAQ Permitting Process

- What does this mean?
 - Major sources of air pollutants
 - Title V Operating Permit – federally enforceable
 - Enforceable by the State of Delaware and the Environmental Protection Agency (EPA)
 - Public Notice
 - 30 days (draft permit)
 - Draft Permit reviewed by EPA Region III (45 day review period)
 - Notice provided to affected states (Maryland, Pennsylvania, New Jersey)

DAQ Permitting Process

- Review application for administrative and technical completeness
- Determine if the source is in the Coastal Zone and if a Coastal Zone permit is required
- Verify appropriate zoning for the project
- Determine applicable requirements (federal and state regulations)
- Review technical information and confirm emission calculations
- Determine concentrations of pollutants outside of the plant's property lines to ensure public health and the environment will not be adversely affected
- Draft technical memorandum – this document includes all the reasoning behind the permit conditions – emission limits, operational limits, testing, monitoring, record keeping, etc.

DAQ Permitting Process

- Draft Permit
- Internal Review of technical memorandum and draft permit
- Once approved, public notice of draft permit (30 days)
- Submitted to EPA Region III for review (45 days)
- Notification given to surrounding states (MD, PA, NJ)
- If no requests for a public hearing, the EPA, or surrounding states the permit will be issued
- Otherwise a public hearing will be held

Applicant Presentation

- Croda, Inc. – facility background and proposed project

Public Hearing Exhibits

- Exhibit 1: Permit Application
- Exhibit 2: Legal Ad News Journal
- Exhibit 3: Legal Ad Delaware State News
- Exhibit 4: EPA declines comment in May 15, 2020 email
- Exhibit 5: Request for hearing, Councilman Street
- Exhibit 6: Email Notification of Hearing News Journal
- Exhibit 7: Email Notification of Hearing Delaware State News

Public Hearing Exhibits

- Exhibit 8: Draft/Proposed Permit: APC-2020/0070-CONSTRUCTION (FE) and memo
- Exhibit 9: Atplus Destiny Tank exemption
- Exhibit 10: DNREC PowerPoint Presentation (to be added)



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Gallon Drumming Tank at Croda, Inc.
(Docket #2020-P-A-0018)**

Thank you for joining us. We will accept comments on this matter through July 31, 2020.

You can submit your comments using the DNREC comment form,
via email, or by USPS mail, as noted on the hearing event page.

A copy of the Court Reporter's full, verbatim transcript will be posted on this hearing's web
page as soon as it becomes available.

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