

DNREC Virtual Public Hearing

For a Federally Enforceable Reg. 1102 Permit Modification for Croda Inc. – Atlas Point (Docket #2021-P-A-0014)

Welcome. Any visual content that is part of this hearing will appear in this window. You can use your computer audio to listen to this hearing. Use the audio connections menu to turn audio on your computer on or off. Or you can dial-in to the hearing using the following information:

DIAL-in Number: 1-408-418-9388
Event Number: 173 792 2610
Password: CRODA

Verbal and written comments will be accepted during this public hearing. Comments will be accepted through Wednesday, July 14, 2021. Please see de.gov/dnrechearings for more information on submitting comments.



Application Timeline

- January 4, 2021 – Received Permit Modification Application
- April 16, 2021 – Received Revised Permit Modification Cover Letter
- May 30, 2021 – Legal Ad
- June 29, 2021 – Public Hearing
- July 14, 2021 – Deadline for Public Comment



Project Summary

- Emissions from the Drying Column Hotwell will be rerouted to the Ethanol Dehydration Furnace (EDF), and no longer emitted. All references to the Hotwell emissions point will be removed from the permit.
- Emissions limits from the Vent Scrubber will remain unchanged; however, the percent VOC reduction shall increase from 95% to 99%, and the scrubber shall be operated within parameters set by performance testing.



Project Summary (continued)

- Emissions from the Ethanol Dehydration Furnace (EDF) shall be increased due to an error in the current permit as follows:
 - CO from 0.46 lb/hr and 2.0 tpy to 1.0 lb/hr and 4.5 tpy
 - NO_x from 0.33 lb/hr and 1.4 tpy to 0.74 lb/hr and 3.2 tpy
 - SO₂ from 0.014 tpy to 0.0073 lb/hr and 0.29 tpy
 - VOC from 1.0 lb/hr and 4.5 tpy to 1.3 lb/hr and 5.7 tpy
 - PM₁₀ from 0.04 lb/hr and 0.18 tpy to 0.093 lb/hr and 0.41 tpy.



Major Source Facility Status

Croda Inc. is considered a Major Source because its potential to emit Nitrogen Oxides (NO_x) is above the Major Source Threshold for New Castle County. Croda Inc. is also considered a Synthetic Minor for VOCs and HAPs.



Major Source Thresholds in Delaware

County	Volatile Organic Compounds VOC	Nitrogen Oxides NO _x	Carbon Monoxide CO	Sulfur Dioxide SO ₂	Particulate Matter PM ₁₀	Hazardous Air Pollutants HAP	Other Air Pollutants
New Castle	25	25	100	100	100	10/25	100
Kent	25	25	100	100	100	10/25	100
Sussex	50	100	100	100	100	10/25	100

- All values are in tons
- HAP values are 10 tons for a single HAP, 25 for 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 so, if a Coastal Zone Permit is required
- Verify appropriate zoning for the project
- Review technical information and confirm emissions calculations
- Perform Air Dispersion Modelling to estimate the concentration of air pollutants at the plant's property line to ensure public health, welfare, and safety will not be adversely affected

DAQ Permitting Process (continued)

- Determine applicable Federal (EPA) and State requirements
- Draft technical memorandum
- The technical memorandum is the basis for the emission limits, operating limits, monitoring, testing, record keeping and reporting requirements in the permit
- Write draft permit
- Provide public notice of federally enforceable construction permit
 - Public (30 days)
 - EPA (45 days)
 - Affected States - MD, PA, NJ – 30 days



DAQ Permitting Process (continued)

- Hold a public hearing if one was requested
 - A Public Hearing was scheduled for application, draft permit and technical memorandum at the time of the public notice
- Respond to Comments (Division of Air Quality and Croda)
- Submit Technical Response Memorandum with Responses to Comments to the Hearing Officer



Public Hearing Exhibits

1. Permit Modification Application
2. Revised Permit Modification Application Cover Letter
3. Legal Notice – Delaware State News
4. Legal Notice – News Journal
5. Technical Memorandum
6. Draft/Proposed Construction Permit
7. State Public Meeting Calendar Notice
8. DNREC Public Notice
9. DNREC Public Hearing Webpage
10. EPA Response – Draft-Proposed Permit – No Comments
11. DNREC Public Hearing Presentation



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Thank you for joining us. We will accept comments on this matter through July 14, 2021.

Comments may be submitted in writing via DNREC Comment form
<https://dnrec.alpha.delaware.gov/public-hearings/comment-form/>
via email-DNRECHearingComments@delaware.gov
or by USPS mail:

Lisa Vest, Hearing Officer
DNREC –Office of the Secretary
89 Kings Highway, Dover, DE 19901

The full verbatim transcript will be posted when it becomes available.
For more information, find the event page for this hearing on the DNREC Public Hearings page
dnrec.alpha.delaware.gov/public-hearings/

