



VIA ELECTRONIC MAIL AND CERTIFIED MAIL – RETURN RECEIPT REQUESTED APC-2016/0068-C A4

April 9, 2021

Eric Rowland
Engineer
Division of Air Quality
Delaware Department of Natural Resources and Environmental Control
State Street Commons
100 W. Water Street / Suite 6A
Dover, Delaware 19901

**Subject: Croda Inc, Atlas Point Facility
Permit Modification Request
Ethylene Oxide Manufacturing Operation
Scrubber T-330 Discharge Rerouting and Hotwell Discharge Rerouting**

Mr. Rowland:

As we discussed on March 29, 2021, following is an updated cover letter for the permit modification application originally submitted on December 30, 2020. The scope of the project has not changed from what was originally submitted. This letter provides additional clarity on the changes Croda is requesting in the package submitted in December.

T-330 Scrubber

There is nothing additional being provided related to the T-330 scrubber rerouting.

F-610 Hotwell

Croda is proposing to reroute the hotwell vent to the ethanol dehydration furnace (EDF, B-1210). This will become an additional component of the waste gas streams that are directed to the EDF for combustion. The organic components of the waste gas will be destroyed by the EDF, thereby eliminating emissions from the hotwell itself and reducing overall emissions to the atmosphere.

The hotwell vent will be combined with other waste gas. It will be a very small portion of the waste gas – approximately 1.5% of the waste gas flow, and less than 1% of the total gas flow to the EDF. Because the hotwell vent flow is such a small percentage of the feed to the EDF, it is not expected to impact the emissions.

As part of this application, Croda also requests that the limits for B-1210 be modified to reflect different emission estimates that were included in the original permit application for the ethylene oxide production process. When the permit application was submitted in 2015, two different emissions estimates were provided for the EDF reflecting different levels of natural gas and waste gas combustion. When the permit was issued on June 30, 2016, the emission limits for the EDF were based on optimal conditions that cannot be met at all times, instead of the estimate reflecting the level that is achievable on a continuous basis. Additionally, the calculations for NO_x were based upon 6% O₂, although this factor was not expressly stated in the permit. Croda is requesting that the emissions for the EDF be modified to reflect the conditions achievable at all times at 6% O₂.

AERSCREEN

The original Screen 3 evaluation performed on the EDF for the permit application utilized the design conditions; therefore, there is no additional screen modeling performed for this permit modification request.

Croda plans to begin construction immediately upon approval of this application and issuance of the construction permit.

If you have any questions or require any additional information, please contact Gwen Lawless at 302-429-5358 or gwendolyn.lawless@croda.com.

Sincerely,



Chris Barnett
Site Director

c: J. French, DNREC (e-mail only)
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