

**TRANSMITTAL MEMORANDUM**

TO: Lisa A. Vest, Hearing Officer, Office of the Secretary

THROUGH: Amy S. Mann, P.E. *ASM*  
Olayiwola I. Okesola, P.E. *O.O.*

FROM: Eric S. Rowland *ESR*

**SUBJECT: Croda Inc.  
Atlas Point  
Transmittal of Two Proposed Federally Enforceable Permits for Department  
Approval**

DATE: January 3, 2024

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Croda Inc. (Croda, the Company, or the Facility) has requested Construction Permits for the installation of the following:

- Two (2) 650 hp Clarke Fire Pumps
  - Application dated December 19, 2022
  - **Permit: APC-2023/0041-CONSTRUCTION (NSPS) (FE)**
- One (1) 110 MMBtu boiler utilizing ultra-low NO<sub>x</sub> burner, flue gas recirculation, and add-on catalytic oxidation unit
  - Application dated January 13, 2023
  - **Permit: APC-2023/0052-CONSTRUCTION (NSPS) (MNSR) (PTE) (GACT) (FE)**

A public hearing on these matters was held on December 6, 2023, with public comments accepted until December 29, 2023. The Division of Air Quality (AQ), having reviewed the verbal comments provided by one (1) individual during the December 6, 2023 public hearing, the documents entered into the hearing record, and having received no comments from the US Environmental Protection Agency (US EPA) pertaining to these matters, considers **Draft Permit: APC-2023/0041-CONSTRUCTION (NSPS) (FE)** and **Draft Permit: APC-2023/0052-CONSTRUCTION (NSPS) (MNSR) (PTE) (GACT) (FE)** ready for approval by the Department.

The sole verbal comments on these matters are in support of the approval of these permits and do not contain any technical questions. As a result, AQ has determined that a Technical Response Memorandum (TRM) is not required. This memo serves to transmit to the Department the following Proposed permits (attached) for approval:

- **Proposed Permit: APC-2023/0041-CONSTRUCTION (NSPS) (FE)**
- **Proposed Permit: APC-2023/0052-CONSTRUCTION (NSPS) (MNSR) (PTE) (GACT) (FE)**

AQ recommends that these Proposed permits be entered into the hearing record. Upon approval by the Department, AQ recommends that these Proposed permits be submitted to the US EPA, Region III, for review.

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pc: Dover Title V File  
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Eric S. Rowland