

# DNREC Virtual Public Hearing

**On Croda Inc.'s Federally Enforceable Construction Permits  
APC-2023/0041-CONSTRUCTION (NSPS) (FE)  
APC-2023/0052-CONSTRUCTION (NSPS) (MNSR) (PTE) (GACT) (FE)  
(Docket #2023-P-A-0019)**

**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: 1-305-224-1968

Access: 841 0053 3001

Passcode: 251679

Comments can be offered tonight or by using the DNREC comment form, via email, or by USPS mail as noted on the hearing event page ([de.gov/dnrechearings](https://de.gov/dnrechearings))

# Project Summary

## Fire Pumps

- Croda has submitted a construction permit application for two (2) 650 hp fire pumps fired on No. 2 fuel oil that are to be installed along with a new 1.2 million gallon water tank (The water tank requires no air permits).
- The fire pumps will be permitted for emergency use.
- The permit number assigned to this application is:  
APC-2023/0041-CONSTRUCTION (NSPS) (FE)

# Project Summary

## Fire Pumps (continued)

- Emissions from fire pumps (combined) shall not exceed:
  - 1.9 tons per year (TPY) NO<sub>x</sub>
  - 0.04 TPY SO<sub>x</sub>
  - 0.59 TPY CO
  - 0.04 TPY VOC
  - 0.061 TPY PM



# Project Summary

## 110 mmBtu/hr Boiler

- Croda has submitted a construction permit application for a 110 mmBtu/hr boiler to be fired on No. 2 fuel oil, natural gas, or a blend of natural gas and landfill gas.
- The boiler will be permitted for unlimited use while fired on natural gas or the natural gas / landfill gas blend.
- The boiler will be limited to 1,475 hours/year of operation while fired on No. 2 fuel oil.
- The permit number assigned to this application is:  
APC-2023/0052-CONSTRUCTION (NSPS) (MNSR) (PTE) (GACT) (FE)

# Project Summary

## 110 mmBtu/hr Boiler (continued)

- The 110 mmBtu/hr boiler will be designated Boiler 6.
- Emissions from Boiler 6 shall not exceed:
  - 21.7 tons per year (TPY) NO<sub>x</sub>
  - 4.8 TPY SO<sub>x</sub>
  - 6.4 TPY CO
  - 2.6 TPY VOC
  - 4.46 TPY PM



# Application Timeline

- December 22, 2022 – Received Permit Application for Two 650 hp Fire Pumps
- January 18, 2023 – Received Permit Application for a 110 mmBtu/hr Boiler (Boiler 6)
- June 5, 2023 – Received revised AQM-5 Form for the 110 mmBtu/hr Boiler (Boiler 6)
- June 9, 2023 – Received revised AQM-5 Form for the 110 mmBtu/hr Boiler (Boiler 6)
- October 29, 2023 – Combined Legal Ad for Fire Pumps and Boiler 6
- December 6, 2023 – Public Hearing
- December 29, 2023 – Deadline for Public Comment

# Major Source Facility Status

Croda Inc. is considered a Major Source because its potential to emit Nitrogen Oxides ( $\text{NO}_x$ ) is above the Major Source Threshold for New Castle County. Croda Inc. is also considered a Synthetic Minor Source for Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs).



# Major Source Thresholds in Delaware

County	Volatile Organic Compounds VOC	Nitrogen Oxides NO <sub>x</sub>	Carbon Monoxide CO	Sulfur Dioxide SO <sub>2</sub>	Particulate Matter PM <sub>10</sub>	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

- 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 proof of local zoning approval
- 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)

- A Public Hearing will be held if requested (in this case, a public hearing was scheduled in advance)
- If the construction permit is issued, DAQ will conduct a Construction-to-Operation inspection following the completion of construction
- Following a successful Construction-to-Operation inspection, the updated terms of the construction permit will be incorporated into the Company's Title V Operating Permit

# Public Hearing Exhibits

1. Permit Application for Fire Pumps
2. Permit Application for Boiler 6
3. Updated AQM-5 for Boiler 6 dated 06-05-23
4. Updated AQM-5 for Boiler 6 dated 06-09-23
5. Technical Memorandum for Fire Pumps
6. Technical Memorandum for Boiler 6
7. Draft Construction Permit for Fire Pumps
8. Draft Construction Permit for Boiler 6
9. Legal Notice – Delaware State News
10. Legal Notice – News Journal



# Public Hearing Exhibits (continued)

11. Legal Notice – Spanish Translation
12. State Public Meeting Calendar Notice
13. DNREC Public Notice
14. DNREC Public Hearing Webpage
15. DNREC Public Hearing Presentation (this presentation)

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(Docket #2023-P-A-0019)**

**Thank you for joining us.**

We will accept comments on this matter through Friday, December 29, 2023.

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.

For more information, find the event page for this hearing on the DNREC Public Hearings page  
([de.gov/dnrehearings](https://de.gov/dnrehearings)).