

1 Particulate Emissions from Fuel Burning Equipment

2 (7 DE Admin Code 1104)

3
4 Docket No. 2023-R-A-0024

5
6
7 Moderated by Theresa Smith

8 Tuesday, August 27, 2024

9 6:00 p.m.

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11
12 Remote Proceeding

13 DNREC Division of Air Quality

14 100 West Water Street, Suite 6A

15 Dover, DE 19904

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22 Reported by: Andrew Weader

23 JOB NO: 6827107

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A P P E A R A N C E S

List of Attendees:

Kelsey Pangman, DNREC Division of Air Quality

(by videoconference)

Renaë Held, DNREC Division of Air Quality Supervisor

(by videoconference)

Yagna Shah, DNREC (by videoconference)

Tina Merrill, DNREC AQ Planner (by videoconference)

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P R O C E E D I N G S

THE REPORTER: We are on the record at 6:00 p.m.

THE HEARING OFFICER: Okay. I think everyone is joined in, so we'll go ahead and get started.

Good evening. The time is now 6:00 p.m. on Tuesday, August 27, 2024. My name is Theresa Smith, and Secretary Garvin has appointed me to serve as the hearing officer for tonight's formal proceedings.

For ADA compliance, tonight's formal proceeding offers closed captioning in a variation of languages. To use the closed captioning feature from your computer, click on "Show Captions" button located at the bottom of your screen. If you don't see the Show Captions button, you may have to select the three dots that say "More."

Once you find your Show Captions button, you should click on the carrot pointing up, which will bring up your translation options. You can select your preferred language from there. If your preferred language is not listed, you can select More, and all the languages will be listed.

1 If you're on a smartphone, select the
2 captions button at the bottom of your screen indicated
3 by CC. Again, if your preferred language is not
4 listed at the bottom, you may have to select the three
5 dots that say More. You should then select "Meeting
6 Settings" with the gear icon next to it.

7 Once the settings page comes up,
8 located at the very bottom, select "Translation
9 Language." From there, you'll be able to select your
10 preferred language and then select "Done" at the top
11 right corner, and then Done again. If the captions
12 are not automatically popping up yet, you may need to
13 select "Captions" again and select "Show Captions."

14 So hopefully, by now, we are all
15 connected properly, and we can now begin the public
16 hearing scheduled before us tonight.

17 First and foremost, I want to thank you
18 all for taking the time out of your schedules to join
19 us. This virtual platform allows the state of
20 Delaware's Department of Natural Resources and
21 Environmental Control to conduct its virtual hearing
22 on the proposed revisions to Docket Number 2023-R-A-
23 0024 (7 DE Admin Code 1104) Particulate Admissions
24 from Fuel Burning Equipment.

1 This is the first of four hearings we
2 will hear tonight, so please bear with me as each
3 hearing will need to reflect its own record, and for a
4 thorough and consistent record, much of what you will
5 hear from me will be repeated for each hearing record.

6 The purpose of the hearing is to build
7 a record in regard to the hearing matter by providing
8 a formal legal platform for the public to learn about
9 the proposed revisions and to enable the public to
10 offer live comment.

11 This hearing is being conducted
12 virtually. No one is together in the same room.
13 Everyone is participating independently at their own
14 respective locations. While we are not physically
15 gathered tonight, Zoom does generate a list of those
16 who are virtually present for this proceeding so that
17 the department will have the record of those who have
18 attended electronically.

19 There is a court reporter virtually
20 present who will prepare a verbatim transcript of this
21 hearing pursuant to the statutory requirement for
22 DNREC to have the same prepared. And as always, that
23 transcript will be posted on the hearing webpage
24 dedicated to this matter as soon as it is received.

1 In addition, I would encourage those
2 who are attending the hearing to also visit the
3 hearing webpage dedicated to this matter for
4 additional details concerning the proposed revisions
5 to 7 D Admin Code 1104. The hearing record presented
6 tonight, along with other related documents, are
7 posted on the department's hearing webpage dedicated
8 to this matter. The hearing webpage can be found
9 online under the administrative law section of DNREC's
10 website, that will be listed toward the end of
11 tonight's hearing.

12 At the conclusion of my introductory
13 remarks, I'll be turning the hearing record over to
14 the department staff to provide their presentation for
15 the record being generated in this matter. Whereas
16 the department would then open the verbal comment
17 portion of the hearing following the department's
18 presentation, the department did not receive
19 registration for verbal comment tonight.

20 It is important to note that the
21 department did offer the opportunity to register to
22 provide verbal comment, as noticed in the legal ads
23 and online. Those who would have wished to provide
24 verbal comment would have had to register by 12:00

1 p.m. today to which there were no registrants by that
2 time.

3 Before we begin the presentations,
4 please be advised of the following protocols that
5 remain in place for all DNREC public hearings. All
6 comments received must be limited solely to the
7 subject matter for tonight's hearing. All comments
8 pertinent to the subject matter of this virtual
9 hearing will be incorporated into the record being
10 generated in this matter.

11 In light of the Administrative
12 Procedures Act, and to ensure that everyone who wishes
13 to offer comment for the secretary's consideration is
14 accommodated, the department is required to, at a
15 minimum, provide a comment period of 15 days after the
16 hearing.

17 There's only one authentic record of
18 this formal proceeding tonight, and it is the official
19 court reporter's verbatim transcript.

20 The statutory purpose of tonight's
21 hearing is to build a record with regard to the
22 department's proposed actions. A record consisting of
23 the transcript of the hearing tonight, all written
24 comments, all exhibits, and eventually, the hearing

1 officer's report will be reviewed by Secretary Garvin.
2 The secretary will ultimately issue an order following
3 that review process containing his decision on this
4 matter and the reasons therefore.

5 Per DNREC standard hearing protocols,
6 there will be no Q&A or chat session permitted during
7 the hearing.

8 It is important to note that no
9 decision has already been made by the department, nor
10 will any decision be made tonight with regard to the
11 proposed regulatory matter.

12 As previously stated, DNREC wishes to
13 ensure that everyone is enabled to offer their
14 comments for inclusion into the record being generated
15 in this matter. As noticed in legal ads and online,
16 the department stated that the public comment period
17 will be open through September 11, 2024.

18 Comments may be submitted through a
19 comment form link on the hearing webpage via email to
20 dnrechearingcomments@delaware.gov, or via the U.S.
21 Post Service at the physical address for DNREC
22 indicated on the hearing webpage and/or the public
23 notices previously issued in this matter.

24 Written comments to DNREC may not be

1 submitted using social media platforms such as
2 Twitter, Facebook, YouTube, and also links to videos
3 or text messaging may not be accepted. Videos either
4 of commenters or third-party speakers will not be
5 accepted as file attachments to written comments or as
6 hyperlinks within the written comments or embedded in
7 email submissions.

8 Please remember that all comment
9 received either through U.S.P.S. or via the electronic
10 mechanisms just noted, as long as received by the
11 department on or before September 11th, will bear the
12 exact same weight and will be considered equally by
13 the secretary prior to making his final decision in
14 this matter.

15 While all comments are appreciated,
16 each comment must be limited solely to the subject
17 matter of tonight's hearing. Multiple comments saying
18 the same thing do not outweigh one singular comment.
19 Simply put, comments are not votes. A single
20 well-supported comment may carry more weight than a
21 thousand form letters.

22 I also want to note that only comments
23 submitted directly to DNREC and entered by myself into
24 the formal record in this matter will be posted on the

1 hearing webpage and be considered by the department as
2 a part of the decision process. The department has
3 not partnered with any outside organization or website
4 to assist with the public submission of comments in
5 this matter, so again, only submit comments to DNREC
6 directly.

7 Lastly, the ultimate decision regarding
8 this matter is made by DNREC's Secretary Garvin. This
9 formal proceeding tonight acts as a mechanism to
10 enable the department to thoroughly vet the hearing
11 matter to the public and to let the public know the
12 various ways in which comment may be submitted for
13 Secretary Garvin's consideration, if so desired.

14 I will now hand it over to
15 Kelsey Pangman with the Division of Air Quality to
16 provide the department's presentation.

17 MS. PANGMAN: Good evening. My name is
18 Kelsey Pangman, and I'm an environmental scientist
19 with the Airshed Planning and Inventory Program for
20 the Division of Air Quality and the Delaware
21 Department of Natural Resources and Environmental
22 Control.

23 The purpose of this hearing is to
24 receive public comments on the proposed updates to

1 Title 7 of the Delaware Administrative Code Regulation
2 1104 Particulate Emissions from Fuel Burning
3 Equipment. Regulation 1104 sets air emission limits
4 for particulate matter for fuel-burning equipment to
5 protect public health and the environment.

6 Regulation 1104 is part of Delaware's
7 State Implementation Plan. A State Implementation
8 Plan is a federally enforceable plan that is developed
9 by states to explain how they will comply with the
10 Clean Air Act to improve air quality.

11 When regulations that are part of the
12 State Implementation Plan are amended, states are
13 required to submit the proposed amendments to the
14 Environmental Protection Agency for approval. If
15 amendments are approved by the Environmental
16 Protection Agency, they become part of the State
17 Implementation Plan and become federally enforceable.

18 On June 30, 2011, the Sierra Club filed
19 a petition with the Environmental Protection Agency's
20 administrator concerning the treatment of excess
21 emissions during periods of startup, shutdown, and
22 malfunction; specifically, how those emissions are
23 treated in State Implementation Plan provisions that
24 the Environmental Protection Agency approved in the

1 past.

2 A startup is the setting and operation
3 of a process or piece of equipment, and a shutdown is
4 the stopping of a process or piece of equipment. A
5 malfunction is a sudden and unavoidable breakdown of
6 process or control equipment. During periods of
7 startup, shutdown, and malfunction, equipment is not
8 running at peak efficiency resulting in excess
9 emissions during these times. Air pollution emitted
10 during these periods may adversely impact the health
11 of people nearby and contribute to smog and other
12 problems in communities that are further downwind.

13 On June 12, 2015, the Environmental
14 Protection Agency took final action on the Sierra Club
15 petition. This final rule is commonly known as the
16 2015 State Implementation Plan Call. In the 2015
17 State Implementation Plan Call, the Environmental
18 Protection Agency clarified its startup, shutdown,
19 malfunction policy interpretation that State
20 Implementation Plan provisions cannot include
21 exemptions for excess emissions during startup,
22 shutdown, and malfunction events.

23 The Environmental Protection Agency
24 directed Delaware to correct specific startup,

1 shutdown, and malfunction provisions in their State
2 Implementation Plan, giving a submissions deadline of
3 November 22, 2016. Title 7 Delaware Administrative
4 Code 1104 was one of the Delaware regulations included
5 in this 2015 State Implementation Plan Call.

6 On November 22, 2016, Delaware
7 submitted a response to the 2015 State Implementation
8 Call. The State Implementation Plan submittal
9 included a revised version of Regulation 1104. The
10 revision removed the offending exemption from the
11 State Implementation Plan, as shown by the strikeout,
12 and created a new 30-day rolling average emission
13 limit in a new subsection 2.2 that would apply at all
14 times, as indicated by the underlying text.

15 It should be noted that Delaware did
16 not agree with the Environmental Protection Agency's
17 position that the startup, shutdown, and malfunction
18 components of Delaware's State Implementation Plan
19 were deficient in relation to the 2015 State
20 Implementation Plan Call.

21 Delaware believes that the startup,
22 shutdown, and malfunction components of its State
23 Implementation Plan were protective of the national
24 ambient air quality standards for particulate matter

1 and not deficient. Therefore, Delaware adopted a
2 state-only version of Regulation 1104, which resulted
3 in the same 0.3 pounds per million British thermal
4 unit 2-hour average for regular operation but allowed
5 a 0.3 pound per million British thermal unit 30-day
6 rolling average for startup, shutdown, and malfunction
7 events.

8 On October 23, 2023, the Environmental
9 Protection Agency issued a final rule disapproving
10 Delaware's November 22, 2016, State Implementation
11 Call submittal for Regulation 1104. Therefore,
12 Delaware is proposing to amend Regulation 1104 in
13 response to the Environmental Protection Agency's
14 disapproval to comply with the 2015 State
15 Implementation Plan Call.

16 The objective of the proposed
17 amendments to Regulation 1104 is to update the
18 exemptions for excess emissions. The amendments
19 address Section 1.0, General Provisions and Section
20 2.0, Emission Limits.

21 The intent of the proposed amendments
22 is to remove the 0.3 pounds per million British
23 thermal unit, maximum 30-day rolling average emission
24 limit for startup, shutdown, malfunction events in

1 Delaware state-only regulation and make the 0.3 pounds
2 per million British thermal units maximum 2-hour
3 average emissions limit apply at all times as shown in
4 the proposed regulation language.

5 Now, we would like to enter 11 exhibits
6 shown on the next two slides into the Delaware public
7 record to support the proposed amendments to Title 7
8 of the Delaware Administrative Code Regulation 1104
9 Particulate Emissions from Fuel Burning Equipment.

10 This completes the department's
11 presentation of proposed amendments to Regulation
12 1104. Thank you.

13 THE HEARING OFFICER: Thank you,
14 Kelsey. I have received the electronic versions of
15 the proposed exhibits by the department. Has there
16 been any changes to the proposed exhibits since
17 posting them on the hearing webpage?

18 MS. PANGMAN: No.

19 THE HEARING OFFICER: Okay. Thank you.
20 I hereby mark the exhibits as
21 Department's Exhibits 1 through 11 into the hearing
22 record.

23 (Department Exhibits 1 through 11 were
24 marked for identification.)

1 THE HEARING OFFICER: As the department
2 has received no registration for public comment by
3 12:00 p.m. today, there will not be a verbal comment
4 portion of the hearing. Again, if you wish to submit
5 public comment in writing, please follow the
6 instructions that we're given during my introductory
7 remarks, and it is also available on the screen for
8 those who are virtually present.

9 The hearing record will remain open
10 through September 11, 2024, as previously mentioned.
11 The court reporter's transcript will be posted on the
12 hearing webpage dedicated to this matter as soon as it
13 is received.

14 I want to thank you all for attending
15 the first of four virtual hearings tonight. This
16 hearing matter is now concluded at 6:17 p.m.

17 THE REPORTER: We're off the record at
18 6:17 p.m.

19 (Whereupon, at 6:17 p.m., the
20 proceeding was concluded.)
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CERTIFICATE

I, ANDREW WEADER, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

Andrew Weader

ANDREW WEADER
Notary Public in and for the
Commonwealth of Pennsylvania

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CERTIFICATE OF TRANSCRIBER

I, SIOBHAN MACKEY, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



SIOBHAN MACKEY

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