

1 Emissions of Sulfur Compounds from Industrial
2 Operations

3 (7 DE Admin Code 1109)

4
5 Docket No. 2023-R-A-0026

6
7
8 Moderated by Theresa Smith

9 Tuesday, August 27, 2024

10 6:37 p.m.

11
12
13 Remote Proceeding

14 DNREC Division of Air Quality

15 100 West Water Street, Suite 6A

16 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)

Renae 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

1
2 THE REPORTER: We're on the record at
3 6:37.

4 THE HEARING OFFICER: Great. Good
5 evening. The time is now 6:37 p.m. on Tuesday, August
6 27, 2024. My name is Theresa Smith, and Secretary
7 Garvin has appointed me to serve as the hearing
8 officer for tonight's formal proceeding.

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

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

22 If you are on a smartphone, select the
23 captions button at the bottom of your screen indicated
24 by CC. Again, if your preferred language is not

1 listed at the bottom, you may have to select the three
2 dots that say More. You should then select "Meeting
3 Settings" with the gear icon next to it.

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

11 So again, I would like to thank you all
12 for remaining online for the third of the four
13 hearings scheduled for tonight. This virtual platform
14 allows the state of Delaware's Department of Natural
15 Resources to conduct its virtual public hearing on the
16 proposed revisions to Docket Number 2023-R-A-0026 (7 D
17 Admin Code 1109) Emissions of Sulfur Compounds from
18 Industrial Operations.

19 The purpose of the hearing is to build
20 a record in regard to the hearing matter by providing
21 a formal legal platform for the public to learn about
22 the proposed revision and to enable the public a way
23 to offer live comment.

24 This hearing is being conducted

1 virtually. No one is together at the same room.
2 Everyone is participating independently at their own
3 respective locations. While we are not physically
4 gathered tonight, Zoom does generate a list of those
5 who are virtually present for this proceeding, so the
6 department will have a record of those who have
7 electronically joined this event.

8 There is a court reporter virtually
9 present who will prepare a verbatim transcript of the
10 hearing pursuant to the statutory requirement for
11 DNREC to have the same prepared, and as always, that
12 transcript will be posted on the hearing webpage
13 dedicated to this matter as soon as it is received.

14 In addition, I would encourage those
15 who are attending the hearing to also visit the
16 hearing webpage dedicated to this matter for
17 additional details concerning the proposed revisions
18 to 7 D Admin Code 1109. The hearing record presented
19 tonight, along with other related documents, are
20 posted on the department's hearing webpage dedicated
21 to this matter. The hearing webpage can be found
22 online under the administrative law section of DNREC's
23 website, that will be listed towards the end of
24 tonight's hearing.

1 At the conclusion of my introductory
2 remarks, I will be turning the hearing record over to
3 the department's staff to provide their presentation
4 for the record being generated in this matter.

5 Whereas the department would then open the verbal
6 comment portion of the hearing following the
7 department's presentation, the department did not
8 receive registration for verbal comment tonight.

9 It is important to note the department
10 did offer the opportunity to register to provide
11 verbal comment, as noticed in the legal ads and
12 online. Those that would have wished to provide a
13 verbal comment would've had to register by 12:00 pm.
14 today, which there were no registrants by that time.

15 Before we begin the presentation,
16 please be advised of the following protocols that
17 remain in place for all of DNREC's public hearings.
18 All comments received must be limited solely to the
19 subject matter of tonight's hearing. All comments
20 pertinent to the subject matter of the virtual hearing
21 will be incorporated into the record being generated
22 in this matter.

23 In light of the Administrative
24 Procedures Act, and to ensure that everyone who wishes

1 to offer comment for the secretary's consideration is
2 accommodated, the department is required to, at a
3 minimum, provide a comment period of 15 days after the
4 hearing.

5 There's only one authentic record of
6 this formal proceeding tonight, and it is the official
7 court reporter verbatim transcript.

8 The statutory purpose of tonight's
9 hearing is to build a record with regard to the
10 department's proposed action, a record consisting of
11 the transcript from the hearing tonight, all written
12 comment, all exhibits, and eventually, the hearing
13 officer's report will be reviewed by Secretary Garvin.
14 The secretary will ultimately issue an order following
15 that review process containing his decision in this
16 matter and the reasons therefore.

17 Per DNREC's standard hearing protocols,
18 there will be no Q&A or chat session permitted during
19 the hearing.

20 It is important to note no decision has
21 already been made by the department, nor will a
22 decision be made tonight with regard to the proposed
23 regulatory matter.

24 As previously stated, DNREC wishes to

1 ensure that everyone is enabled to offer their
2 comments for inclusion into the record being
3 generated. As noticed in legal ads and online, the
4 department stated that the public comment period will
5 be open through September 11, 2024.

6 Comments may be submitted through a
7 comment form link on the hearing webpage via email to
8 dnrechearingcomments@delaware.gov or via the U.S.
9 Postal Service at the physical address for DNREC
10 indicated on the hearing webpage and/or public notices
11 previously issued in this matter.

12 Written comments to DNREC may not be
13 submitted using social media platforms such as
14 Twitter, Facebook, YouTube, or text messaging. Videos
15 either of commenters or third-party speakers will not
16 be accepted as file attachments to written comments or
17 as hyperlinks within written comments or embedded in
18 email submissions.

19 Please remember that all comment
20 received either through U.S.P.S. or via the electronic
21 mechanisms noted just now, as long as received by the
22 department on or before September 11th, will bear the
23 exact same weight and will be considered equally by
24 the secretary prior to making his final decision in

1 this matter.

2 While all comments are appreciated,
3 each comment must be limited solely to the subject
4 matter of tonight's hearing. Multiple comments saying
5 the same thing do not outweigh one singular comment.
6 Simply put, comments are not votes. A single
7 well-supported comment may carry more weight than a
8 thousand form letters.

9 I also want to note that comments
10 submitted directly to DNREC and entered by myself into
11 the formal hearing record in this matter will be
12 posted on the hearing webpage and be considered by the
13 department as a part of the decision process. The
14 department has not partnered with any outside
15 organization or websites to assist the public
16 submissions of comments in this matter, so again, only
17 submit comments to DNREC directly.

18 Lastly, the ultimate decision regarding
19 this matter is made by DNREC's Secretary Garvin. This
20 formal proceeding tonight acts as a mechanism to
21 enable the department to thoroughly vet the hearing
22 matter to the public and to let the public know the
23 various ways which comment may be submitted for
24 Secretary Garvin's consideration, if so desired.

1 I will now hand it over to
2 Kelsey Pangman with the Division of Air Quality to
3 provide the department's presentation.

4 MS. PANGMAN: Good evening. My name is
5 Kelsey Pangman, and I am an environmental scientist
6 with the Airshed Planning and Inventory Program for
7 the Division of Air Quality and the Delaware
8 Department of Natural Resources and Environmental
9 Control.

10 The purpose of this hearing is to
11 receive public comments on the proposed updates to
12 Title 7 of the Delaware Administrative Code Regulation
13 1109, Emissions of Sulfur Compounds from Industrial
14 Operations.

15 Regulation 1109 sets air emission
16 limits for sulfur dioxide from process operations to
17 protect public health and the environment. Regulation
18 1109 is part of Delaware's State Implementation Plan.
19 A State Implementation Plan is a federally enforceable
20 plan that is developed by states to explain how they
21 will comply with the Clean Air Act to improve air
22 quality.

23 When regulations that are part of the
24 State Implementation Plan are amended, states are

1 required to submit the proposed amendments to the
2 Environmental Protection Agency for approval. If
3 amendments are approved by the Environmental
4 Protection Agency, they become part of the State
5 Implementation Plan and become federally enforceable.

6 On June 30, 2011, the Sierra Club filed
7 a petition with the Environmental Protection Agency
8 administrator concerning the treatment of excess
9 emissions during periods of startup, shutdown, and
10 malfunction; specifically, how those emissions are
11 treated in State Implementation Plan provisions that
12 the Environmental Protection Agency approved in the
13 past.

14 A startup is the setting and operation
15 of a process or equipment, and a shutdown is the
16 stopping of a process or piece of equipment. A
17 malfunction is a sudden and unavoidable breakdown of
18 process or control equipment. During periods of
19 startup, shutdown, and malfunction, equipment is not
20 running at peak efficiency resulting in excess
21 emissions during these times. Air pollution emitted
22 during these periods may adversely impact the health
23 of people nearby and contribute to smog and other
24 problems in communities that are further downwind.

1 On June 12, 2015, the Environmental
2 Protection Agency took final action on the Sierra Club
3 petition. This final rule is commonly known as the
4 2015 State Implementation Plan Call. In the 2015
5 State Implementation Plan Call, the Environmental
6 Protection Agency clarified its startup, shutdown,
7 malfunction policy interpretation that State
8 Implementation Plan provisions cannot include
9 exemptions for excess emissions during startup,
10 shutdown, and malfunction events.

11 The Environmental Protection Agency
12 directed Delaware to correct specific startup,
13 shutdown, and malfunction provisions in their State
14 Implementation Plan, giving a submissions deadline of
15 November 22, 2016. Title 7 Delaware Administrative
16 Code 1109 was one of the Delaware regulations included
17 in this 2015 State Implementation Plan Call.

18 On November 22, 2016, Delaware
19 submitted a response to the 2015 State Implementation
20 Call. The State Implementation Plan submittal
21 proposed the removal of Title 7 Delaware
22 Administrative Code 1109 from the State Implementation
23 Plan in its entirety in order to remove the offending
24 startup, shutdown, and malfunction exemption language

1 from the State Implementation Plan.

2 It should be noted that Delaware did
3 not agree with the Environmental Protection Agency's
4 position that the startup, shutdown, and malfunction
5 components of Delaware's State Implementation Plan
6 were deficient in relation to the 2015 State
7 Implementation Plan Call.

8 Delaware believed that the startup,
9 shutdown, and malfunction components of its State
10 Implementation Plan were protective of the National
11 Ambient Air Quality Standards and not deficient.
12 Therefore, Delaware maintained regulation 1109 as a
13 state-only regulation.

14 On October 23, 2003 [sic], the
15 Environmental Protection Agency issued a final rule
16 disapproving Delaware's November 22, 2016, State
17 Implementation Call submittal for Regulation 1109.
18 Therefore, Delaware is proposing to amend Regulation
19 1109 in response to the Environmental Protection
20 Agency's disapproval to comply with the 2015 State
21 Implementation Plan Call.

22 The objective of the proposed
23 amendments to Regulation 1109 is to comply with the
24 2015 State Implementation Call to remove exemptions of

1 startup, shutdown, and malfunction. The amendments
2 address section 1.0, General Provisions and Delaware
3 state-only regulation, and make the emission limit
4 apply at all times, as shown in the proposed language.

5 Now, we would like to enter 11 exhibits
6 shown on the next two slides into the public record to
7 support the proposed amendments to Title 7 of the
8 Delaware Administrative Code Regulation 1109,
9 Emissions of Sulfur Compounds from Industrial
10 Operations.

11 This completes the department's
12 presentation of the proposed amendments to Regulation
13 1109. Thank you.

14 THE HEARING OFFICER: Thank you,
15 Ms. Pangman. Has there been any changes to what is
16 proposed on the hearing webpage as exhibits?

17 MS. PANGMAN: No changes.

18 THE HEARING OFFICER: Thank you.

19 I have received the electronic versions
20 of the proposed exhibits by the department and hereby
21 mark these as the Department's Exhibits 1 through 11.

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

24 THE HEARING OFFICER: As the department

1 received no registration for public comment by 12:00
2 p.m. today, there will be no verbal comment portion at
3 tonight's hearing. Again, if you wish to submit
4 public comments in writing, please follow the
5 instructions that were given earlier, and it is also
6 available on the screen for those who are virtually
7 present.

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

13 I want to thank you all for attending
14 the third of four virtual hearings tonight. And this
15 hearing is now concluded at 6:53 p.m.

16 THE REPORTER: We're off the record at
17 6:53 p.m.

18 (Whereupon, at 6:53 p.m., the
19 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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