

DNREC Virtual Public Hearing

On Croda Inc.'s Federally Enforceable Construction Permit APC-2023/0098-CONSTRUCTION (FE) (Docket #2024-P-A-0005)

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: 1-646-931-3860

Access: 816 6303 7736

Passcode: 064442

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)



Project Summary

Flare System

- Croda has submitted a construction permit application for the installation of a flare system consisting of a 20-inch diameter steam assisted natural gas flare with a 3-inch diameter steam assisted piggyback flare.
- The flare system will be permitted for operation in an idle state at all times, and for no more than 876 hours of activated use.
- The permit number assigned to this application is:
APC-2023/0098-CONSTRUCTION (FE)



Project Summary

Flare System (continued)

- Emissions from the operation of the flare system shall not exceed:
 - 2.6 tons per year (TPY) NO_x
 - 0.02 TPY SO_x
 - 2.2 TPY CO
 - 0.1 TPY VOC
 - 0.2 TPY PM
- Emissions from the flaring of waste gases sent to the flare system shall be subject to existing permits and regulations.



Application Timeline

- June 16, 2023 – Received Permit Application for the Flare System
- November 20, 2023 – Received Additional Requested Information for the Flare System
- March 6, 2024 – Pre-Notification Draft Permit provided to Croda for Review and Comment
- March 15, 2024 – Pre-Notification Draft Permit Comments Received from Croda
- March 24, 2024 – Legal Ad for Flare System
- April 24, 2024 – Public Hearing
- May 10, 2024 – Deadline for Public Comment

Major Source Facility Status

Croda Inc. is considered a Major Source because its potential to emit Nitrogen Oxides (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 _x | Carbon Monoxide CO | Sulfur Dioxide SO ₂ | Particulate Matter PM ₁₀ | 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 Flare System
2. Additional Information Email from November 20, 2023
3. Technical Memorandum for Flare System
4. Draft Construction Permit for Flare System
5. Legal Notice: Delaware State News Affidavit
6. Legal Notice: News Journal Affidavit
7. Legal Notice: Spanish Translation
8. State Public Meeting Calendar Notice
9. DNREC Public Notice



Public Hearing Exhibits (continued)

10. DNREC Public Hearing Webpage

11. DNREC Public Hearing Presentation (this presentation)



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Thank you for joining us.

We will accept comments on this matter through Friday, May 10, 2024.

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).

