

State of Delaware

Department of Natural
Resources and
Environmental Control

Division of Air Quality



*Annual
Title V Fee
Committee
Status
Report*

Calendar
Year
2020

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This report meets the requirements of 7 Del. C. Chapter 60, Subchapter VIII, Section 6097(1)

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Introduction

Title V is an air pollution control program, based in federal law, designed to standardize air quality permits and the permitting process for major sources of air emissions across the country. The name "Title V" comes from Title V of the 1990 Federal Clean Air Act Amendments, which required that the U.S. Environmental Protection Agency (EPA) establish a national operating permit program. Accordingly, EPA adopted regulations [Title 40 of the Code of Federal Regulations, Chapter 1, Part 70 (Part 70)] which required states and local permitting authorities to develop and submit a federally enforceable operating permit program for EPA approval. As a result, the State of Delaware developed 7 DE Admin. Code 1130.

Section 502(b) of the 1990 Clean Air Act Amendments requires that all sources subject to the permitting requirements under Title V of the 1990 Clean Air Act Amendments pay an annual fee, sufficient to cover all reasonable (direct and indirect) costs required to develop and administer the permit program. These requirements were incorporated into 7 *Del. C.* Chapter 60, Subchapter VIII. These fees must be reviewed periodically (currently every three years) before the authorization expires to consider adjustments. In the State of Delaware, these annual fees are paid by both "Major Sources" and "Synthetic Minor" sources. EPA defines a Major Source as a facility that emits, or has the potential to emit (PTE) any criteria pollutant or hazardous air pollutant (HAP) at levels equal to or greater than the Major Source Thresholds (MST). The MST for criteria pollutants may vary depending on the attainment status and non-attainment classification (e.g. moderate, serious, severe, extreme) of the geographic area in which the facility is located. Sources may also elect to take voluntary limits to reduce their PTE to below the MST. These sources are called Synthetic Minor sources.

The Title V revenue is intended to ensure a stable level of support for the technically complex activities undertaken by the Department of Natural Resources and Environmental Control (DNREC or the Department) to ensure both protection of human health and the environment and a reasonable level of service to customers seeking permits and other services. The services provided by the Department, supported wholly or partially by this Title V fee revenue, are summarized in a later section of this report called "Program Accomplishments" and include:

- Permitting activities;
- Compliance activities;
- Enforcement activities;
- Planning activities;
- Emission inventory activities;
- Air monitoring activities;
- Portion of Small Business Ombudsman activities; and
- Other special projects/accomplishments.

These activities and the fees required to support this work are consistent with the EPA guidance for Title V programs. This report is intended to provide a reasonable amount of accountability for those activities and the fees assessed.

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Title V Fee Committee

Delaware Statute established the Title V Operating Permit Program Advisory Committee¹ (also known as the Title V Fee Committee herein) and specified that the membership of this committee include certain emitting business interests as well as members of the public and non-governmental organizations. The purpose or charter of the Title V Fee Committee is to assess whether the fees collected pursuant to 7 *Del. C.* Chapter 60, Subchapter VIII are adequate to ensure the effective implementation of the Program and to make recommendations to remedy or improve any deficiencies or elements of the Program.

The Title V Fee Committee, by working together, has expanded its scope to include renegotiating the Title V fee structure periodically prior to expiration to ensure that the eligible financial needs of the Division of Air Quality (DAQ) and other Title V requirements are being met while the payment burden is distributed fairly across the Major Source and Synthetic Minor facilities. Over the past several fee cycles, the DAQ, in coordination with the Committee, established revenue requirements based on Full Time Employee (FTE) staffing levels. The projected staffing levels and supporting salaries set the basis for the total Title V annual revenue for the subsequent three-year fee cycle. Once the revenue target is set, the Title V Fee Committee works with the Major and Synthetic Minor Sources to determine how the fees will be distributed fairly.

The Title V Fee Schedule for 2018-2020, which was supported by the Title V Fee Committee, was presented to the Delaware General Assembly through Senate Bill 103. It was passed by the Senate on June 8, 2017, passed by the House on June 30, 2017, and was signed by the Governor on July 17, 2017. The current legislation can be found in 7 *Del. C.* Chapter 60, Subchapter VIII and is available at: <http://delcode.delaware.gov/title7/c060/sc08/index.shtml>.

The Title V Fee Committee met three times in 2020:

- January 10, 2020: The Committee met to continue their discussions related to the 2021-2023 program revenue requirements and the supporting fee structure.
- February 6, 2020: The committee met to further discuss the program revenue requirements and reached a tentative agreement on the fee structure. Follow-on discussions with the Department Secretary were required to reach a final agreement.
- August 19, 2020: The Committee met to review 2019 Annual Report and discuss the expanded hours reporting proposal.

The materials from each of these meetings are available for review at:

<https://dnrec.alpha.delaware.gov/air/permitting/major-air-sources/title-v-committee/>

¹ 7 *Del. C.* Chapter 60, Subchapter VIII § 6099 requires that the Committee "...include, but not be limited to, the Secretary of the Department of Natural Resources and Environmental Control, or the Secretary's duly appointed designee; the Director of the Division of Air Quality, or the Director's duly appointed designee; 2 members who will represent stationary sources; 1 to be a member of the Chemical Industry Council; a member of the Delaware State Chamber of Commerce; a member representing a public utility; 2 members of a nationally affiliated or state environmental advocacy group; and the chairpersons of the House and the Senate Natural Resource Committees. The Secretary of the Department of Natural Resources and Environmental Control shall serve as the Chair of this Committee."

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Billing

The Title V invoices for Calendar Year 2020 were mailed in January 2020. Facilities could choose to pay their bill in one payment or in quarterly payments. If the facility chose to pay their bill in one payment, it was due 30-days after the invoice date. If the facility chose to pay their bill in quarterly payments, the payments were due on February 15th, May 15th, August 15th, and November 15th. If a facility does not pay their bill, they are considered overdue and will be sent three reminders. The third reminder is sent certified mail. A source is considered delinquent if their bill was not paid in full by December 31, 2020. Any delinquent source shall be subject to a 2% compounding monthly interest rate for each month delinquent. Furthermore, consistent with the legislation, the Department has the authority to revoke a permit on the sole basis that the annual fee has not been paid.

Overall Program Costs

See Table 1 for a summary breakdown of Calendar Year 2020 Title V Costs.

Table 1: 2020 Title V Costs

Salary	\$2,385,939.91
Travel	\$0.00
Contractual ²	\$124,980.00
Supplies	\$5,395.82
Capital Outlay	\$23,115.54
Additional Support Services ³	\$345,705.50
Total	\$2,885,136.77

Note: Significant reductions in supplies, travel, equipment, and contractual categories can be contributed to FFY 2020 and 2021 federal multipurpose grant awards (\$97,000) and reduced spending during COVID operations.

Note: In previous years the the Small Business Ombudsman Program, at 100% of cost, was considered an additional support services cost. As of July 2019, these salary costs, reduced to 30%, were incorporated into the overall program salary costs.

Note: While the state operates on a fiscal year basis (July 1 - June 30), the Title V fees are billed and spent on a calendar year basis. Consequently, some “Additional Support Services” costs, charged by other programs/organizations, may be expended outside of CY 2020 cost factors.

Note: 2020 Title V Account Annual/Monthly statement is presented in Appendix A.

² Items covered under the “Contractual” category include: Fleet charges (vehicle rental), building rent, utilities, vendor payments, temp services, and the upkeep of some air monitoring equipment.

³ Items covered under “Additional Support Services” include: Information Technology (\$14,026.20), the Environmental Crimes Unit (\$304,487.62) and Office of the Secretary Support (\$27,191.68).

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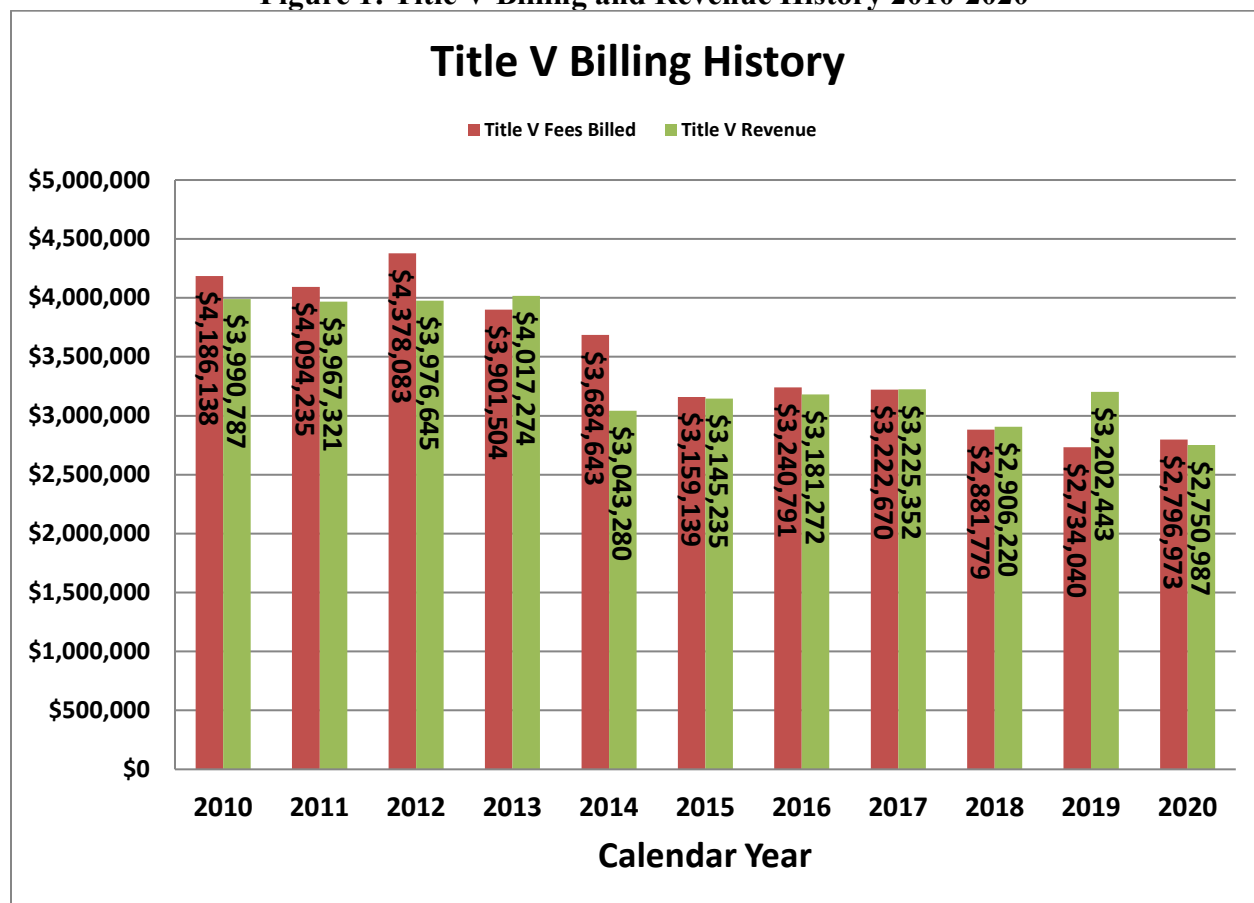
Fees Collected

Title V fees are billed on a calendar year basis (January 1 through December 31) and the 2020 Title V revenue is determined by the actual monies deposited into the Title V account during calendar year 2020 only. The final revenue is impacted by interest gained on the Title V account, quarterly payments, and some early payments that may be received and deposited in December 2019 for 2020 fees. This makes comparing revenue and fees collected difficult.

For CY2020, **72** Synthetic Minor and **50** Title V facilities were billed. Following application of the user fee credit program (approximately \$385,000, see Table 7), a total of **\$2,796,973.43**, including previous years' back fees, was billed. Of the total amount billed, **\$2,787,154.39** was collected and **\$9,819.04** is delinquent. The difference of **\$9,819.04** was the result of one facility's non-payment of fees and two additional facilities' failure to pay past late fees assessed on 2019 delinquent balances (see Table 5). Any back fees that are collected in 2021 will be counted towards the 2022 revenue.

The Calendar Year 2020 Title V revenue was **\$2,750,987.13**. See Figure 1 for a history of Title V billing and revenue since 2010.

Figure 1: Title V Billing and Revenue History 2010-2020



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On December 31, 2020, the Title V cash carryover balance was **\$2,658,942** (see Table 2). Table 3 below captures the carryover balance history, while Table 4 predicts the carryover balance for end of year 2020.

Table 2: Title V Carryover Balance Calendar Year 2020

	2020
*2019 Carryover Cash Balance	*\$2,793,092
2020 Title V Fee Revenue	\$2,750,987
Sub-Total	\$5,579,070
2020 Total Expenses	\$2,885,137
2020 Actual Carryover Balance	\$2,658,942

*Corrected 2019 Carryover Balance

Table 3: Title V Carryover Balance History by Calendar Year

	2015	2016	2017	2018	2019	2020
Total Title V Fee Revenue	\$3,145,235	\$3,181,272	\$3,225,352	\$2,906,220	\$3,202,443	\$2,750,987
Total Expenses	\$2,979,694	\$3,141,964	\$3,232,830	\$3,626,944	\$3,247,684	\$2,885,136
Actual Carryover Balance	\$4,445,358	\$3,612,029	\$3,559,156	\$2,838,432	*\$2,793,092	\$2,658,942

*Corrected 2019 Carryover Balance

As previously noted, the Title V revenue is determined by the actual monies deposited into the Title V account during a calendar year. The final revenue is impacted by interest gained on the Title V account, quarterly payments, and some early payments that may be received and deposited in one year for the next year's fees.

Table 4: CY2021 Title V Carryover Balance Projection

	2021 Prediction
2020 Actual Carryover Balance	\$2,658,942
Estimated 2021 Title V Fee Revenue	\$3,875,995
Estimated 2021 Total Expenses	\$3,573,781.43
Δ Revenue – Expenses	\$302,214
2021 Projected Carryover Balance	\$2,894,655

The 2021 revenue prediction used in the above calculation was based upon the total amount of actual fees billed for 2021 to include overdue fees from previous year billings. The 2021 total expenses prediction was based upon projected 2021 salary expenses for an average staffing level of 98%. For additional expense categories, the five-year averages plus an additional 2% cost of living expense for 2021 was used.

Delinquent Facilities

Consistent with legislative requirements and the Department collection policy, the Division of Air Quality first reported delinquent facilities in the 2014 Annual Report. As of the date of this report, Table 5 and Table 6 (below) provide a status update for the facilities reported delinquent for 2019 and 2020.

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Table 5: 2019 Delinquent Facilities

Facility Name	Amount Due	Recovery Actions
Micropore Inc.	\$7,700.77	Includes 2019 overdue balance and late fees. Facility was notified and a payment plan was established. As of March 2021 past fees are paid in full.
TOTAL	\$7,700.77	

Table 6: 2020 Delinquent Facilities

Facility Name	Amount Due	Recovery Actions
First State Investors 5200	\$8,341.00	Company abandoned facility in 2019. Unable to contact owner. Established contact with owner's Property Manager. Property owner notified and billed for delinquent fees and future fees. Expect payment as soon as possible.
Coker Concrete	\$1,309.00	Facility did not pay a portion of 2020 fees equivalent to 2020 fee credit. Notified facility that because it had been delinquent, it was not eligible to receive the fee credit in 2020. Payment expected as soon as possible.
JP Morgan Chase - Morgan Christiana Ctr.	\$169.04	Facility did not pay 2019 late fees on 2020 invoice. Notified and payment expected immediately.
TOTAL	\$9,819.04	

Fee Structure Calendar Years 2018 - 2020

CY 2020 was the final year of the 2018-2020 fee cycle. Key changes for the 2018-2020 fee cycle were the category "K" Base Fee and User Fee category "10" normally assigned to new facilities, were deleted. Also, effective December 31, 2017, all new facilities were evaluated and assessed a base fee based on estimated hours and a user fee based on the maximum allowable permitted emissions values. All other fee categories remained the same as the 2015 - 2017 fee tables.

For existing facilities, the 2018-2020 Base Fee was calculated on the total hours expended on each facility for the five-year period from 2012-2016. The User Fee was calculated on the facility's most recent baseline year emission inventory report (2014). See fee schedule in Table 7 below:

Table 7: Calendar Year 2018 through 2020 Title V Fee Schedule

Fee Type	Category	Category Description	2018 - 2020 Fees
Base Fee	A	> 6,000 Hours	\$277,020
Base Fee	B	5,001 – 6,000 Hours	\$108,300
Base Fee	C	4,001 – 5,000 Hours	\$93,480
Base Fee	D	3,001 – 4,000 Hours	\$80,940
Base Fee	E	2,001 – 3,000 Hours	\$57,000
Base Fee	F	1,501 – 2,000 Hours	\$42,180
Base Fee	G	1,001 – 1,500 Hours	\$28,500
Base Fee	H	667 – 1,000 Hours	\$18,240
Base Fee	I	334 – 666 Hours	\$9,120
Base Fee	J	0 – 333 Hours	\$5,700

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Fee Type	Category	Category Description	2018 - 2020 Fees
User Fee	1	> 2,000 Tons	\$350,000
User Fee	2	1,001 – 2,000 Tons	\$100,000
User Fee	3	501 – 1,000 Tons	\$60,000
User Fee	4	201 – 500 Tons	\$28,000
User Fee	5	101 – 200 Tons	\$12,000
User Fee	6	51 – 100 Tons	\$9,000
User Fee	7	26 – 50 Tons	\$6,000
User Fee	8	6 – 25 Tons	\$4,100
User Fee	9	0 – 5 Tons	\$3,950

User Fee Credit Program

As part of the 2018-2020 legislation, the user fee credit was revised for calendar years 2018, 2019 and 2020.

In 2018-2020 the Department granted annual user fee credits to sources with an active Title V or Synthetic Minor permit on or before December 31, 2017, and without delinquent accounts. User fee credits for 2018, 2019 and 2020 were calculated as a percentage of the total Program annual fee reduction amount of \$385,000. As described in Table 8 below, eligible facilities were granted the following fee credit percentages and amounts by User Fee category:

Table 8: User Fee Credits

User Fee Category	Fee Credit Percent	Fee Credit
1	Will receive a credit of 30.14% of \$385,000	\$116,039
2	Will receive a credit of 8.61% of \$385,000	\$33,149
3	Will receive a credit of 5.17% of \$385,000	\$19,905
4	Will receive a credit of 2.41% of \$385,000	\$9,279
5	Will receive a credit of 1.03% of \$385,000	\$3,966
6	Will receive a credit of 0.77% of \$385,000	\$2,965
7	Will receive a credit of 0.52% of \$385,000	\$2,002
8	Will receive a credit of 0.35% of \$385,000	\$1,348
9	Will receive a credit of 0.34% of \$385,000	\$1,309

New Fee Structure CY 2021-2023

The new Title V Fee Schedule for CY 2021-2023, which was supported by the Title V Fee Committee, was presented to the Delaware General Assembly through Senate Bill 249. It was passed by the Senate on June 23, 2020 and passed by the House on June 25, 2020, and was signed by the Governor on August 6, 2020.

This legislation updated the fee assessments based on the work of the Title V Operating Permit Program Advisory Committee and makes additional clarifying updates to the fee provisions. For 2021-2023, the total fee will be comprised of a base fee, user fee, and a program fee. Base fees are based on the number of staff hours spent on the source's permitting, compliance, and enforcement activities, while the user fee is based on the source's air emissions. The program fee will be assessed based on the total base and user fees. Additionally, the fee credit program implemented to reduce a prior fund balance was allowed to sunset as scheduled on December 31, 2020.

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While the base and user fees categories and amounts remain the same (see Table 7 above) the program fees are described below in Table 9.

Table 9: Program Fees

Category	Total Base and User Fees	Fee Amount
PF1	Total Base and User Fees greater than \$125,000	\$38,250
PF2	Total Base and User Fees \$100,000 - \$124,999	\$34,425
PF3	Total Base and User Fees \$50,000 - \$99,999	\$22,950
PF4	Total Base and User Fees \$25,000 - \$49,999	\$11,475
PF5	Total Base and User Fees \$15,000 - \$24,999	\$6,120
PF6	Total Base and User Fees \$10,000 - \$14,999	\$3,825
PF7	Total Base and User Fees < \$10,000	\$3,060

Current Staffing Levels

The Division's end of calendar year 2020 staffing level was 85% and 9 positions were vacant. See Table 10 for a breakdown of the staffing levels for the Sections and Groups within the Division.

Table 10: Division of Air Quality Staffing Levels (12/31/2020)

Section/Group	Authorized	Occupied	Staffing Level
Director's Staff	2	2	100%
Analytical Support Group	3	2	67%
Operations Support Group (OSG)	4.5	2.5	56%
Engineering & Compliance Section	23.5	21.5	91%
Planning Section	27	23	85%
Total	60	51	85%
Temporary Positions	2.0	0.0	0%
Seasonal Positions	2.0	1.0	50%

During CY2020 several positions were reclassified and redistributed across the Division. Additionally, seven full-time employees retired or separated, and four additional full-time employees were hired. See Table 11 for a list of hiring actions taken in calendar year 2020.

Table 11: Calendar Year 2020 Hiring Actions

Date	Name	Source	Position	Section	Funding
1/6/20	Carla Godwin	External	Admin. Specialist	Eng/Comp	Grant/TV
5/24/20	Tristan Bostock	External	Env. Scientist II	Planning	TV
6/8/20	Kimberly Gould	Internal	Program Manager I	OSG	Grant/TV
6/8/20	Natalie Ephraim	External	Env. Scientist II	Planning	Grant/TV
11/22/20	Valerie Gray	Internal	Program Administrator	Planning	Gen Funds

In 2017, state-wide personnel reductions decreased the Division's authorized positions from 65 to 61 FTEs with a Departmental hiring cap of 57 employees. The Department rescinded the hiring cap in January 2019. In August of 2019, the Division's authorizations were further reduced from 61 to 60 full time positions.

The DAQ organizational chart, dated December 31, 2020, is depicted in Appendix B.

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PROGRAM ACCOMPLISHMENTS

Title V Permitting Activities 2020

DAQ is responsible for all permitting activities at Title V and Synthetic Minor facilities. In calendar year 2020, the following permitting activities were accomplished:

- No new Title V Permits were issued; however two applications for new facilities were received.
- 9 Title V Permit Renewals were issued;
- 4 Title V Significant Permit Amendments were issued;
- 1 Public Hearing was held for the Delaware City Refining Company Title V Permit;
- No new Synthetic Minor Permits were issued;
- 9 Synthetic Minor Permit Amendments were issued.

The Division of Air Quality is required to issue Title V Renewal Permits within 18 months or 547 days of determination of receipt of a complete application as defined by [7 DE Admin. Code 1130 \(http://regulations.delaware.gov/AdminCode/title7/1000/1100/1130.shtml#TopOfPage\)](http://regulations.delaware.gov/AdminCode/title7/1000/1100/1130.shtml#TopOfPage). In calendar year 2020, the Division of Air Quality issued Title V Permit Renewals in 815 days of complete application receipt on average. This figure is a slight reduction from the 2019 average. DAQ continues to train new staff and issue permits that have been extended past their initial expiration date. Although the target was not met, the issuance of extended permits is representative of forward progress. DAQ expects this progress to continue through 2021.

As part of the Value Stream Mapping efforts for the Synthetic Minor permitting program, the Division of Air Quality has committed to issuing Synthetic Minor permits and amendments within 120 days of receiving a complete application. In calendar year 2020, DAQ met this goal with an average of less than 100 days.

DAQ attempted to hire a new engineer and a new engineer Program Manager I in 2020. Those efforts were not successful but will continue in 2021.

2020 Title V Compliance Activities

Many Title V related compliance activities are undertaken by the DAQ each year. These activities include on-site compliance evaluations or inspections, stack tests, and report reviews. Inspections continued throughout 2020 in spite of the COVID-19 pandemic. Completing inspections required flexibility from the DAQ staff as well as from facilities. Off-site and virtual observations were used in some cases to limit person to person contact and records reviews were conducted offsite to limit the onsite time for the inspection. These adjustments allowed the DAQ to continue to meet its inspection goals while following safety guidelines. In calendar year 2020, the following compliance activities were undertaken:

- 35 on-site compliance evaluations were conducted at Title V facilities;
- 190 stack tests were conducted at Title V facilities;
- 235 report reviews were conducted for Title V facilities;
- 19 on-site compliance evaluations were conducted at Synthetic Minor facilities;
- 20 stack tests were conducted at Synthetic Minor facilities; and

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- 29 report reviews were conducted for Synthetic Minor facilities.

2020 Title V Enforcement Activities

If the compliance activities described above indicate that a facility is not in compliance with requirements, the DAQ will pursue enforcement action against that facility. Enforcement actions may take the form of Notices of Violation, Administrative Orders, Consent Decrees or Agreements, or Stipulated Penalties. In some cases, the Department takes no further action depending upon specific circumstances such as whether the violation was self-reported, minor, isolated and corrected quickly. In other cases, the Department has the authority and may seek, and generally obtains, fines and penalties. In calendar year 2020, the following enforcement activities were completed (please note that this does not include pending enforcement activities):

- 12 Notices of Violation were issued to Title V facilities;
- 1 Administrative Order was issued to a Title V facility;
- 3 Notices of Violation were issued to Synthetic Minor facilities;
- 1 Administrative Order was issued to a Synthetic Minor facility;
- No Stipulated Penalty Demand Letters were issued; and
- No Consent Decrees were issued.

2020 Title V Planning Activities

During 2020, many challenges were faced as Planning Section staff adjusted to the new normal with COVID-19 pandemic requirements to work remotely. The Planning Section of the Division of Air Quality was able to successfully accomplish the following Title V related planning activities in calendar year 2020:

- State Implementation Plan (SIP) activities:
 - Submitted the Ozone (2015) SIP documents for the RACT SIP, Base Year Inventory and the Non-Attainment New Source Review/Emission Statement Program Certifications to EPA for review and approval.
 - EPA approved the following SIP revisions that Delaware submitted:
 - The 111(d) State Plan and regulation amendment (Section 30 of 7 DE Admin. Code 1120) to fulfill the requirements of 40 CFR Part 60 Subpart B and 40 CFR Part 60, Subpart Cf, which regulated emissions from municipal solid waste landfills.
 - 2015 Ozone NAAQS Infrastructure SIP
- Regulatory Development Activities:
 - Submitted amendments to EPA for review & approval: 7 DE Admin. Code 1124 Sections 26 & 36 – Stage I/II (Nov. 2020); 7 DE Admin. Code 1125 (Dec. 2019, Approved May 2020).
 - Proposed new regulation - 7 DE Admin. Code 1151 - Prohibitions on Use of Certain Hydrofluorocarbons in Specific End-Uses (Public Hearing March 2020).
 - Adopted amendments to 7 DE Admin. Code 1124 - Control of Volatile Organic Compound Emissions, Sections 26.0 and 36.0 “Stage I/II Vapor Recovery” (Published July 2020).

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- Continued work on amendments to 7 DE Admin. Code 1124 - Control of Volatile Organic Compound Emissions, Section 33.0 “Solvent Cleaning” (Public Hearing Dec. 2020) and 7 DE Admin. Code 1126 and 1131 - Motor Vehicle Inspection Programs for Sussex, Kent and New Castle Counties.
- Mobile Source Activities including:
 - Participated on Metropolitan Planning Organizations (WILMAPCO and Dover/Kent MPO) Technical Advisory Committee meetings;
 - Met with the Transportation Conformity Inter-Agency Consultation Workgroup to discuss SIP planning for PM_{2.5} and Ozone Attainment;
 - Participated in Vehicle Inspection and Maintenance Activities;
 - Participated on the Clean Air Council Delaware Diesel Difference; the Delaware Clean Air Council; and
 - Conducted the annual vehicle remote sensing study to provide data to 1) evaluate the effectiveness of Delaware’s vehicle inspection and maintenance program, and 2) develop strategies to further reduce mobile source emissions.
- Other Planning Activities:
 - Continued work on Delaware’s second Regional Haze SIP.
 - Submitted to the EPA, in accordance with 40 CFR §58.10(a), an annual air monitoring network plan.
 - Provided support to the Coastal Zone program for conducting technical reviews of Coastal Zone applications;
 - Coordinated with the Division of Climate, Coastal and Energy on the development of Delaware’s first Climate Action Plan.
 - Continued to provide compliance assistance and oversight to auto body shops, dry cleaners, and gasoline delivery vessels for state and federal air regulations; and
 - Continued to track and provide oversight on vapor recovery tests of regulated gasoline dispensing facilities.
- Litigation and EPA comments:
 - Continued work with the DE Attorney General regarding the U.S. Court of Appeals for the District of Columbia’s ruling for EPA’s exemption for RICE engines: 50-hour exemption from air pollution control requirements, for RICE engines that participate in demand response programs.
 - Continued to work with the EPA and other states and organizations to address and mitigate the impact of upwind emissions on Delaware’s ozone air quality problems.
 - The Ozone Transport Commission (OTC) submitted (June 2020) a recommendation under section 184(c) of the Clean Air Act (CAA). OTC recommended that EPA require Pennsylvania to adopt daily limits on emissions of nitrogen oxides from coal-fired power plants with existing SCRs or SNCRs that are at least as stringent as limits in place for plants in Delaware, Maryland, or New Jersey to ensure that controls are optimized throughout the ozone season in order to help downwind states attain the ozone standard by the dates required in the CAA.
 - The D.C. Circuit Court ultimately affirmed EPA’s decision to deny Delaware’s Section 126 petitions (2019) targeting power plants in Pennsylvania and West Virginia that significantly contribute to ozone nonattainment in Delaware because they are not appropriately controlled/regulated. However, the Court reversed EPA’s

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unreasonable decision that Delaware failed to identify an air quality problem that was linked to the upwind sources. By recognizing that any state within a multistate nonattainment area can file a Section 126 petition based on air monitoring data from across the multistate area, the Court recognized that air pollution is not constrained by state borders and that all states adversely affected by upwind air pollution have the right to address that air pollution. The Division continues to investigate its options based on this decision.

- As a result of the court's decision in 2019 to remand the original Cross State Air Pollution Rule (CSAPR) update on October 30, 2020, the EPA proposed to revise the CSAPR Update rule to address the remaining interstate pollution-transport obligations under the Clean Air Act (CAA) for the 2008 ozone National Ambient Air Quality Standards (NAAQS). DAQ submitted comments regarding EPA's proposal.
- Submitted comments to EPA regarding EPA's proposal to retain the 2015 Ozone NAAQS.

2020 Title V Emission Inventory Activities

The Emission Inventory Group is part of the Planning Section of the Division of Air Quality. The Emission Inventory Group is charged with preparing all necessary inventories of emissions from all sources of air pollution in the State, including stationary sources, area sources, and mobile sources. The information gathered by the Emission Inventory Group is used in many of the planning activities described above. The information collected includes annual emissions of criteria air pollutants, air toxics, and greenhouse gases.

The Emission Inventory Group accomplished the following Title V related activities in calendar year 2020:

- Contacted all permitted facilities required to report a 2019 emissions inventory by April 30, 2020;
- Managed the on-line emissions reporting application and provided guidance to facility representatives during the reporting process;
- Facilitated the collection of 2019 point source emissions inventory reports from 50 Title V facilities;
- Facilitated the collection of 2019 point source baseline emission inventory reports from two facilities recently issued Synthetic Minor permits;
- Performed a technical review of the emissions data submitted by facilities for completeness and accuracy; and
- Submitted 2019 point source emissions inventory data to EPA's Emissions Inventory System.

2020 TV Ambient Air Monitoring Activities

The DAQ's Ambient Monitoring Section is responsible for collecting ambient air data throughout the State of Delaware. This data is in support of DAQ's commitment to the citizens of Delaware to provide a healthy environment for every person independent of their economic or social status. The Ambient Monitoring Team is dedicated to analyzing the ambient air criteria pollutants as

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specified in EPA's National Ambient Air Quality Standard (NAAQS), measure fine particle pollutants (PM_{2.5} & PM₁₀) and select air toxic pollutant measurements reliably and with the highest possible quality. Special Studies are also developed when monitoring indicates there may be issues of concern.

The projects listed below are several of the initiatives to enhance DAQ's monitoring network and improve data quality in 2020:

- Replaced monitoring networks Windows 7 PC's with Windows 10 compatible machines.
- Upgraded 3G modems with 5G wireless modems providing WiFi at every location.
- Upgraded DAQ's monitoring network's Data Acquisition System to provide better data management and Quality Assurance reporting.
- Continued to develop a Photochemical Assessment Monitoring System (PAMS) to provide data on 57 volatile organic compounds (VOC's) by installing an automated Gas Chromatograph. These compounds contribute in the formation of ozone.
- Installed a Ceilometer Upper Air Measurement System to determine cloud height and the transport of pollutants into Delaware from other regions.
- Upgraded Ultrasonic Meteorology instruments to determine wind speed and wind direction to help in the identification of pollution sources.
- Installed Solar Radiation measurement instruments to aid in the analysis of ozone formation.

2020 Title V Small Business Ombudsman Program Activities

The Small Business Assistance Program (SBAP) within the Department of Natural Resources and Environmental Control (DNREC) is a free service available to all new and existing small businesses located in the State of Delaware. The SBAP can help small businesses understand their environmental requirements and help them comply in the easiest and most effective way. The SBAP is a non-regulatory program. The Small Business Ombudsman (SBO) is part of the SBAP which was created through the Clean Air Act Amendments of 1990. The SBAP is comprised of one staff member, the Small Business Ombudsman, who manages the SBAP.

The SBAP provides the following services:

- Serves as initial contact within DNREC for small businesses;
- Provides specific information for small businesses detailing how to comply with environmental regulations specific to their industry;
- Helps small businesses fill out permit applications, forms and other required paperwork;
- Keeps abreast of developing regulations and current issues impacting small businesses and shares that information with small businesses through workshops, newsletters, trade association meetings, mailings, websites, or other methods;
- Provides feedback to the Division of Air Quality from small businesses;
- Helps resolve permitting and compliance disputes and cuts red tape; and
- Serves as the manager of the Regulatory Advisory Service (RAS).

The SBO serves on the following committees:

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- Title V Fee Committee;
- Delaware Envirothon planning committee; and
- Division of Air Quality's Envirothon Project Team.

The SBO also serves as the Department's Registrar of Regulations and is responsible for coordinating with the state Office of the Registrar of Regulations.

In Calendar Year 2020 the SBO conducted the following activities:

- Assisted ten businesses through the Regulatory Advisory Service (RAS). Meetings were held for five of the businesses that had more significant permitting requirements. Two of those meetings were held in person and three were held virtually due to the Coronavirus pandemic restrictions.
- Provided permit and compliance assistance to 43 entities.
- Communicated with representatives of local chambers of commerce, trade associations, the Delaware Prosperity Partnership, and the Delaware Division of Small Business.
- Served on the Title V Committee's Training Subcommittee that worked to develop air permitting training for the general public. Training sessions were scheduled for March 18 and 26 however, they were postponed on March 13 due to the Coronavirus pandemic. The trainings were subsequently scheduled to be held in January 2021 and changed to a virtual format. Responsible for communications and outreach, securing the training facilities, and registration.
- Served on the Natural Minor (Reg. 1102) Permitting Fee Initiative committee tasked with gaining support from the regulated community for a proposed fee increase. Provided support with document review, workshop arrangements, and outreach.
- As the Department's Registrar, worked with Division staff to ensure the Regulatory Development Process steps were being followed. Specific to the Division of Air Quality, one Start Action Notice initiating the process was approved, and a total of 14 items were submitted to the State Registrar's office for publication in the Monthly Register of Regulations: 3 proposals, 2 finals, and 9 general notices.
- Participated in a variety of outreach events.
 - Continued participating in the statewide *County is Open for Business* events held throughout the year in each county. Attended four in-person events in the first three months of the year before the Coronavirus pandemic caused stringent restrictions to be placed on public gatherings and ultimately eliminated most events. Attended one virtual event during the pandemic. Through these events 18 contacts were made with business entrepreneurs interested in learning about DNREC and potential permit/regulation requirements.
 - Delaware Envirothon - sponsored by the Del. Assoc. of Conservation Districts (competition was scheduled for Apr. 23 but was canceled due to Coronavirus pandemic)
 - Served as co-chair of the Division of Air Quality's Envirothon project team and as such had shared responsibility for coordinating planning meetings; preparing meeting notes and updating the online project folder; coordinating the team's efforts in updating the annual training guide; developing and

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implementing a two hour training session; coordinating the development/updating of competition test questions; and coordinating staff involvement for the competition.

- Highlight for the 2020 competition year was the development of a brand new air quality focus which was Policy and Point Sources.
- Training session was held on Saturday, February 1, 2020 and was attended by 28 high school students and 4 advisors representing 5 high schools in New Castle and Kent counties and one 4H club.

2020 Other Special Accomplishments and Projects

The Division of Air Quality's most significant accomplishment in 2020 was adapting to the pandemic, and rapidly changing how and where we conducted our operations. The Division essentially transformed to a telework force overnight and adapted all its operations to comply with COVID restrictions.

During this same time period, the Division was constantly preparing to transition back to our normal office environment and field operations in a similar rapid fashion. When directed, we stand ready to execute a safe and effective recovery plan.

Consistent with our strategy, the Division, operating in a telework environment, has and will continue to ensure that all its processes are **SAFE**, efficient, meet customer needs, and follow a continuous improvement methodology.

Operations Support Group (OSG)

OSG reports directly to the Director but provides support to the entire Division. OSG faced the challenge of COVID-19 pandemic requirements during 2020 head-on. OSG accomplishments during 2020 include:

- Identifying the State Street Commons office (SSC) as the temporary DAQ home base, effective March 2020. Where possible, DAQ employees were directed to telework and obtain permission from the Director prior to visiting the SSC or Grantham Lane offices. The Grantham Lane office was open to staff based on operational needs, such as the critical efforts to maintaining the network of air monitoring stations. Signage was utilized at the Grantham Lane office to provide visitors and vendors with further instructions.
 - OSG facilitated routing of the Grantham Lane telephone calls through the SSC switchboard.
 - SSC administrative specialist personnel provided telephone coverage during business hours
 - OSG also facilitated routing of all mail and faxes through SSC, with OSG transporting mail from The SSC office to the Grantham Lane office on a routine basis. Documents of an urgent nature that were addressed to Grantham Lane personnel were scanned by SSC personnel and e-mailed same day to the recipient.

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- OSG teamed with the Delaware Department of Technology and Information (DTI) to ensure that DAQ employees had the appropriate technology to access the intranet by providing laptops as needed to facilitate teleworking. New employees were provided with a DNREC laptop as they came on board and as needed.
 - OSG coordinated with DTI to obtain “remote” intranet access (DTI COVID link) for employees so that they could work remotely with the ability to utilize all of the programs (timekeeping, DEN, etc.) and drives that they were able to access previously.
- OSG reviewed the employee office and cubicle spacing at SSC and Grantham Lane with respect to COVID-19 social distancing. In instances where two employees were sharing an office, one employee was temporarily relocated to an empty office.
 - OSG acknowledged that it would be necessary for select DAQ personnel to access SSC and Grantham periodically and after obtaining approval from the Director.
 - OSG posted COVID-19 signage at the SSC and Grantham Lane offices reminding visitors and employees to utilize social distancing in office, bathrooms and kitchen spaces.
 - OSG provided DAQ personnel with COVID-19 protective equipment including gloves, masks, touchscreen pens, hand sanitizer and sanitizing wipes. Supplies were re-stocked as necessary.
 - OSG also installed and maintained several hand-free sanitizer stations at the SSC and Grantham Lane facilities.
- OSG coordinated weekly cleaning services at the SSC and Grantham Lane offices to maintain a safe environment for employees and the public.
- OSG is responsible for the general oversight of maintenance at SSC and Grantham Lane facilities. The SSC facility is a leased facility, therefore all maintenance and repairs are conducted by and coordinated with the owner of that building.
- The Grantham Lane facility is a state-owned property. Therefore, that facility’s maintenance and repairs are coordinated with and conducted by the State of Delaware’s Division of Facilities Management (DFM) personnel. It is OSG’s responsibility to contact DFM when repairs at the Grantham Lane property are needed.

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Department Electronic Content Management (ECM) Activities

The Department is currently undertaking several projects that comprise its overall ECM Initiative. These include an electronic document management system, called DNREctory, and e-Permitting. The DAQ was the first and only division to “go-live” in 2019, specifically on March 4, 2019. The DAQ has continued to participate in efforts to rollout DNREctory to all divisions in the Department. This has included providing perspective from the only division using a production version of DNREctory as changes are contemplated to facilitate Department-wide use.

The DAQ continues to work with our partners in the Department of Technology and Information and a consultant on the development of the e-Permitting project. Work is ongoing currently for area sources and Regulation 1102 permitting. Future phases of the project will include Title V and Synthetic Minor facilities. The current project schedule anticipates development throughout the 2nd quarter of 2021 with testing and launch in the 3rd quarter of 2021. The DAQ is looking forward to working with our customers as we progress towards implementation.

While the Air Quality Team met the challenges of the pandemic, the Division also participated in many special projects. These special projects may or may not be Title V related. However, the results of these projects often impact Title V activities. In calendar year 2020, the Division of Air Quality participated in the following special activities:

- Management and administrative activities including:
 - Director and leadership staff finalized Title V fee negotiations with the Title V Fee Committee for the 2021-2023 fee cycle.
 - Although initially planned as part of a joint bill to address both the 2021-2023 Title V fees as well as a Natural Minor (Reg. 1102) permit fee increase initiative, the Natural Minor fee increase was postponed in April 2020.
 - Aligned with our succession planning activities, the leadership team continued restructure of the Division through reclassifications and realignments.
 - The DAQ strengthened its leadership team by establishing a Planning Section Program Administrator, and balancing the supervision level across the Section’s multiple program elements.
 - Through additional reclassifications, the DAQ expanded the Operations Support Group by creating an additional Management Analyst position and reassigning dedicated administrative support.
 - Further validated the 2018 TV billing improvement project with a third year of error-free billing for 2020.
 - The DAQ has worked diligently throughout 2020 and first quarter of 2021 to prepare facility-specific timesheet data. This information will be provided to facilities directly on an as-requested basis as supplemental information to the overall totals that are provided in this report. The additional data will be helpful for facilities to understand the activities that comprise the total hours of work that the DAQ has expended with respect to their facility.

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- Through preparedness and aggressive application submittals, DAQ secured a second EPA Multi-Purpose Grant (\$15K) to be used towards the new air quality forecasting contract.
 - While purchasing additional instruments, station modems and monitoring network computers, the two EPA Multi-Purpose Grants (CY 2020-2021) provided sufficient support to fund the first 1.25 years of the new contract.
 - These efforts led to a significant savings (approximately \$59K) to the Title V program.
- Participated in outreach activities including:
 - Throughout 2019, a Title V training committee worked to plan and prepare training sessions. The intent was to offer in person training in March 2020. This was not possible due to the pandemic. In late 2020 the training committee reconvened to plan virtual training sessions. These sessions were successfully held throughout January in 2021. The training sessions included multi-perspective presentations on permitting of generators and boilers. This was only possible due to the support and participation from facility's staff. The DAQ looks forward to additional training sessions in the future.
 - For a ninth year, the DAQ worked with the Delaware Envirothon Committee supporting high school level environmental education. Since 2012, Air Quality has been included as a key topic/study area for the Delaware Envirothon competitions. The Division of Air Quality is a Gold Sponsor for the Envirothon program supporting the Delaware and International Envirothon competitions;
 - The DAQ Envirothon Team continued work, that began in 2019, for the 2020 Envirothon Competition. A new topic, Policy and Point Sources, was created and training for the students was conducted in February 2020. Unfortunately, due to the pandemic, the decision was made to cancel the 2020 Envirothon Competition.
 - Educational programs and public outreach events addressing energy conservation;
 - Educational programs and public outreach events addressing school-related anti-idling requirements;
 - Educational information and public outreach efforts related to open-burning restrictions;
 - Air quality awareness outreach; and
 - Asthma awareness outreach.

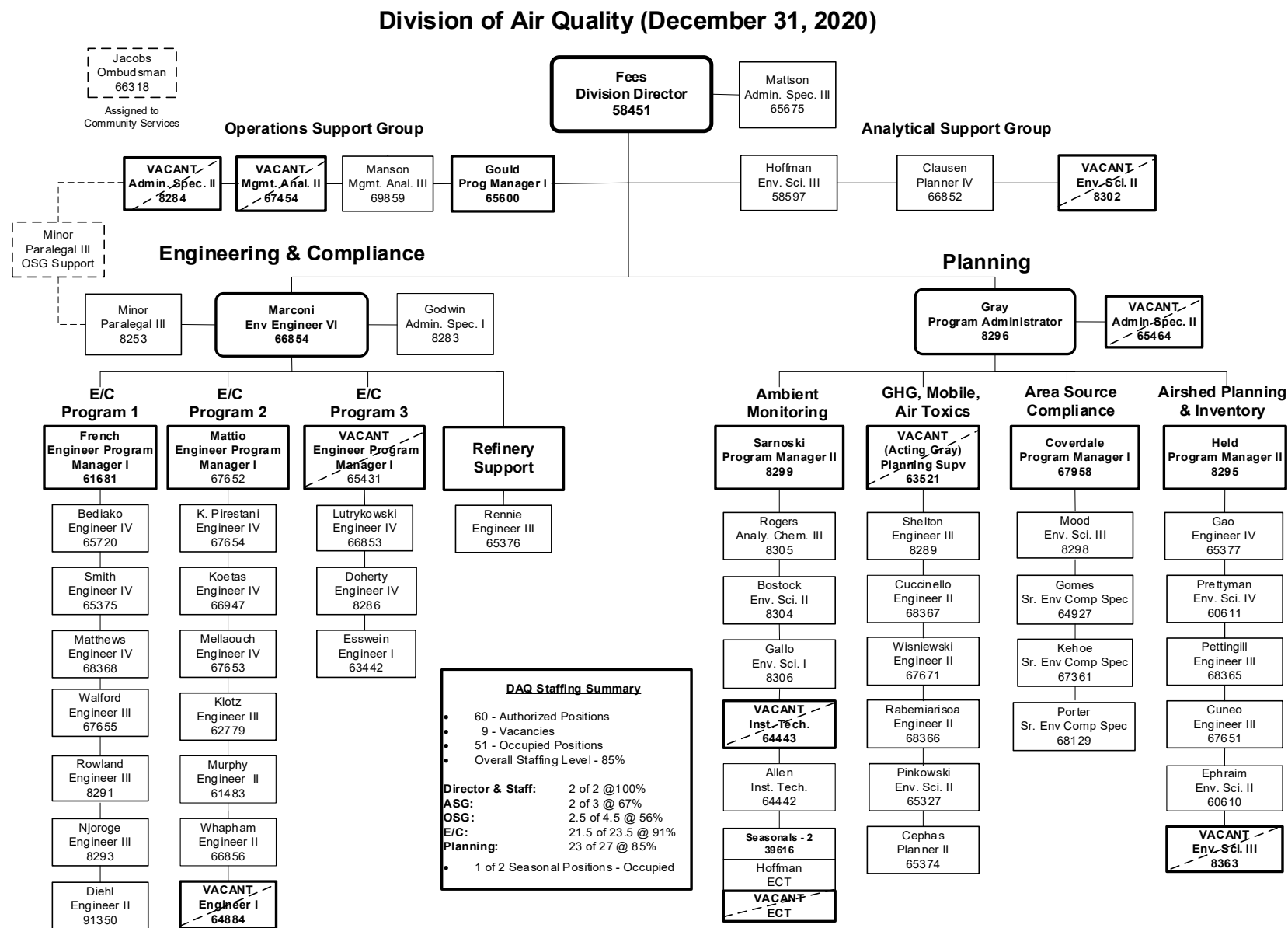
Appendix A: 2020 Title V Monthly Expense and Revenue

Table 11: 2020 Title V Account Expenses & Revenue								
MONTH	EXPENSES						INTEREST	REVENUE
	Salary	Energy	Travel	Contractual	Supplies	Capital Outlay		
January	\$268,836.91	\$0.00	\$0.00	\$25,481.02	\$2,998.96	\$0.00	\$6,885.96	\$13,995.96
February	\$187,717.33	\$0.00	\$0.00	\$23,409.67	\$758.53	\$0.00	\$6,297.18	\$2,049,517.18
March	\$210,873.58	\$0.00	\$0.00	\$338,792.33	\$598.81	\$0.00	\$6,605.03	\$468,803.41
April	\$181,568.13	\$0.00	\$0.00	\$10,090.11	\$306.31	\$0.00	\$9,019.66	\$44,852.66
May	\$202,111.79	\$0.00	\$0.00	\$2,189.18	\$0.00	\$0.00	\$9,705.92	\$33,248.17
June	\$196,002.13	\$0.00	\$0.00	\$8,752.66	\$0.00	\$0.00	\$9,456.59	\$66,280.84
July	\$229,620.71	\$0.00	\$0.00	\$5,661.94	\$0.00	\$0.00	\$7,920.37	\$21,181.37
August	\$169,063.90	\$0.00	\$0.00	\$17,826.00	\$32.81	\$0.00	\$7,596.96	\$15,937.96
September	\$165,833.85	\$0.00	\$0.00	\$6,742.82	\$0.00	\$0.00	\$6,209.60	\$10,649.85
October	\$200,752.97	\$0.00	\$0.00	\$9,145.94	\$685.41	\$0.00	\$5,373.63	\$6,873.63
November	\$156,079.64	\$0.00	\$0.00	\$6,440.95	\$14.99	\$23,115.54	\$4,578.16	\$15,728.16
December	\$217,478.97	\$0.00	\$0.00	\$16,152.88	\$0.00	\$0.00	\$3,917.94	\$3,917.94
2020 Totals	\$2,385,939.91	\$0.00	\$0.00	\$470,685.50	\$5,395.82	\$23,115.54	*\$83,567.00	\$2,750,987.13
2020 Total Expenses	\$2,885,136.77							

*Total interest included in revenue totals.

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Appendix B: DAQ Organizational Chart (December 31, 2020):



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Appendix C: Facility Hours and Emissions History (Page 1 of 4): As the program transitions to 2021-2023 fee cycle, we provide the most current applicable hours and emissions data for each facility billed in 2020. Expanded reporting details for CY 2020 are available upon request.

Facility ID #	Company Name	Class	2020 Hours	2019 Hours	2018 Hours	2017 Hours	2016 Hours	2015 Hours	Total CY 2015-2019	2017 NO _x (TPY)	2017 PM ₁₀ (TPY)	2017 SO ₂ (TPY)	2017 VOC (TPY)	2017 Total
1000300049	1007 Market St. Condominium Association	TV	47.50	50.00	214.00	33.50	124.00	85.25	506.75	5.698	0.030	0.034	0.313	6.07
1000300463	Advanced Pavement Group, LLC	SM	137.50	29.50	12.50	74.00	129.50	64.75	310.25	2.770	0.366	0.133	0.121	3.39
1000300073	Aeero Technologies LLC	TV	131.00	27.50	110.75	52.00	101.25	26.25	317.75	0.368	0.004	0.002	4.579	4.95
1000300131	Alfred I DuPont Hospital For Children	TV	78.00	9.50	44.25	36.50	81.00	77.50	248.75	17.808	0.428	0.373	0.902	19.51
1000300933	Allan Myers DE, Inc. Wilmington	SM	18.75	51.00	203.00	431.50	193.50	134.00	1013.00	2.059	1.878	0.271	1.214	5.42
1000100006	Allan Myers, Delaware, Inc - Dover	SM	38.00	23.75	119.25	72.00	16.50	56.25	287.75	2.072	2.009	0.294	2.590	6.97
1000500130	Allan Myers, Delaware, Inc - Georgetown	SM	313.25	118.25	15.75	65.50	32.50	39.00	271.00	1.488	1.339	0.195	1.831	4.85
1000300924	Amazon.Com	SM	11.00	62.50	2.50	0.00	62.00		127.00	0.000	1.090	0.000	0.000	1.09
1000100247	Ameresco Delaware Energy - Sandtown	TV	250.00	238.25	231.75	292.50	222.00	219.00	1203.50	31.240	10.890	4.670	69.170	115.97
1000500258	Ameresco Delaware Energy - Southern	TV	518.25	476.50	251.25	331.25	304.25	292.75	1656.00	28.540	8.420	24.720	52.840	114.52
1000300785	American Air Liquide-Glasgow	SM	54.00	40.00	88.50	44.50	15.50	2.00	190.50	0.442	0.003	0.003	0.617	1.07
1000300023	Amtrak Wilmington Maintenance Facility	TV	154.75	99.25	10.75	66.00	41.00	155.50	372.50	0.000	0.005	0.000	1.394	1.40
1000300017	Ashland Specialty Ingredients G. P.	SM	5.00	129.00	366.25	207.25	237.00	349.00	1288.50	1.893	0.081	0.061	0.898	2.93
1000300107	AstraZeneca Pharmaceuticals, LLC-Newark	SM	61.00	9.00	100.50	141.00	0.00	49.00	299.50	5.677	0.059	0.061	0.351	6.15
1000300003	BASF Color & Effects USA LLC - Newport	TV	415.50	795.00	454.00	220.00	250.50	131.50	1851.00	17.356	1.265	0.248	22.154	41.02
1000100026	Bayhealth Medical Center-Kent General Hospital	SM	55.00	26.00	18.00	68.00	33.50	41.00	186.50	4.763	0.108	0.110	3.438	8.42
1000300277	BOA - Bracebridge Corporation - Deerfield Complex	SM	4.25	54.25	98.75	26.00	65.00	0.00	244.00	1.154	0.023	0.007	0.042	1.23
1000300599	BOA-Christiana Center.	SM	1.25	0.75	2.25	5.00	35.25	0.00	43.25	0.300	0.005	0.000	0.009	0.32
1000300291	Buckeye Terminals - Wilmington Site	TV	173.00	66.50	345.75	226.75	94.25	293.50	1026.75	4.136	0.451	0.041	47.640	52.27
1000300317	Calpine Mid-Atlantic Generation-Christiana Energy Ctr.	TV	69.00	151.00	133.50	162.00	56.25	30.75	533.50	0.831	0.146	0.084	0.001	1.06
1000300005	Calpine Mid-Atlantic Generation-Del City Energy Ctr.	TV	65.50	112.50	65.50	141.00	50.25	25.25	394.50	0.550	0.073	0.027	0.000	0.65
1000300007	Calpine Mid-Atlantic Generation-Edge Moor	TV	170.00	225.25	421.50	310.50	453.00	356.50	1766.75	96.927	3.743	46.117	8.220	155.01
1000300388	Calpine Mid-Atlantic Generation-Hay Road	TV	132.00	400.50	289.00	176.50	511.00	594.25	1971.25	498.000	72.389	8.900	29.709	609.00
1000300006	Calpine Mid-Atlantic Generation-West Energy Center	TV	85.75	108.00	86.50	141.00	52.75	29.75	418.00	0.480	0.075	0.098	0.001	0.65
1000300600	CCI-Bracebridge I, LP	SM	118.50	50.00	1.25	4.00	32.00	0.00	87.25	2.005	0.023	0.006	0.085	2.12
1000300080	Christiana Care Health Services - Christiana Hospital	TV	232.00	193.50	126.25	492.25	199.50	121.75	1133.25	15.187	0.104	0.126	4.235	19.65
1000300024	Christiana Care Health Services - Wilmington Hospital	SM	69.00	172.25	0.00	71.50	128.75	3.00	375.50	6.560	0.073	0.075	0.711	7.42
1000100263	Christiana Materials - Farmington	SM	0.00	40.00	35.00	6.50	0.00	0.00	81.50	4.68	5.00	1.29	4.80	15.77
1000300068	Christiana Materials, LLC	SM	22.00	35.00	135.00	40.00	117.25	10.00	337.25	3.636	5.061	0.557	1.692	10.94
1000100002	City Of Dover - McKee Run Generating Sta	TV	315.75	149.50	139.25	254.25	181.75	90.50	815.25	10.735	0.080	3.125	0.498	14.44
										Reflects Permitted Emission Values.				

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Appendix C: Facility Hours and Emissions History (Page 2 of 4): As the program transitions to 2021-2023 fee cycle, we provide the most current applicable hours and emissions data for each facility billed in 2020. Expanded reporting details for CY 2020 are available upon request.

Facility ID #	Company Name	Class	2020 Hours	2019 Hours	2018 Hours	2017 Hours	2016 Hours	2015 Hours	Total CY 2015-2019	2017 NO _x (TPY)	2017 PM ₁₀ (TPY)	2017 SO ₂ (TPY)	2017 VOC (TPY)	2017 Total
1000100076	City Of Dover-Van Sant Generating Sta	TV	248.75	175.75	177.25	105.75	87.50	153.25	699.50	3.415	0.010	0.015	0.063	3.50
1000300867	Clarios	TV	170.50						0.00	0.000	0.000	0.000	0.000	0.00
1000300290	Clean Earth Of New Castle Inc	TV	177.50	33.25	89.75	84.75	64.00	394.25	666.00	5.938	0.116	9.326	0.961	16.34
1000100219	Coastal Coatings Inc - Dover	SM	0.00	0.00	0.00	7.50	3.00	3.25	13.75	0.000	0.000	0.000	3.590	3.59
1077700162	Coker Concrete Roving Crusher	SM	51.50	10.50	2.00	4.00	163.50	6.00	186.00	0.347	0.063	0.059	0.048	0.52
1000300066	Contractors Materials LLC - Heald Street	SM	53.00	37.75	0.00	11.50	29.25	66.00	144.50	2.119	2.935	0.261	2.634	7.95
1077700800	Corrado Construction Co LLC	SM	0.50	0.00	28.50	0.00	5.50	0.00	34.00	0.000	0.000	0.000	0.000	0.00
1000300058	Croda, Inc	TV	1150.00	806.75	654.50	628.50	602.50	463.25	3155.50	17.818	1.380	0.696	9.073	28.97
1000300351	Dana Railcare	SM	29.00	39.00	42.25	0.00	0.00	1.25	82.50	0.143	0.019	0.014	0.205	0.38
1000300365	Dassault Falcon Jet-Wilmington Corp	TV	121.00	334.75	259.25	97.75	296.50	169.00	1157.25	1.073	0.018	0.008	10.569	11.67
1000300016	Delaware City Refining Co-Delaware City	TV	3521.75	3220.50	3794.25	3751.00	2864.75	2566.00	16196.50	1455.601	395.299	370.080	341.105	2562.08
1000300404	Delaware City Refining Co-Marketing Terminal	TV	43.25	29.00	84.00	60.50	125.25	97.75	396.50	0.119	0.013	0.001	22.698	22.83
1000100005	Delaware Hospital For The Chronically II	SM	11.75	168.00	38.25	1.50	13.50	46.50	267.75	2.139	0.038	0.037	0.117	2.33
1000300827	Delaware Park Horse Racing Track	SM	0.00	72.00	0.00	47.75	0.00	30.00	149.75	0.216	0.034	0.098	0.079	0.43
1000300415	Delaware Recyclable Products, Inc	SM	224.50	224.25	240.75	21.00	86.25	23.00	595.25	4.840	9.224	25.406	4.000	43.47
1000300111	Delaware Solid Waste Authority, Cherry Island	TV	212.50	120.00	141.50	278.50	467.25	416.75	1424.00	13.316	3.665	12.660	4.457	34.10
1000100068	Delaware Solid Waste Authority, Sandtown	TV	49.50	109.75	170.50	48.50	25.00	141.00	494.75	1.060	0.306	0.604	9.424	11.39
1000500099	Delaware Solid Waste Authority, Southern	TV	196.00	492.00	616.50	164.00	158.25	202.25	1633.00	0.593	0.021	0.456	7.812	8.88
1000100066	Delaware State University	TV	93.50	44.00	177.25	315.00	202.25	123.25	861.75	4.130	0.094	0.374	0.212	4.81
1000300077	Dept Of Veterans Affairs Medical Center	TV	194.00	131.25	70.00	99.25	67.50	104.50	472.50	2.166	0.019	0.029	0.161	2.38
1000300001	DHSS - Herman Holloway Campus	SM	97.50	102.50	0.00	0.00	0.00	0.00	102.50	2.24	0.17	0.01	0.12	2.54
1077700233	Diamond Materials LLC - Roving Crusher	SM	1.00	13.00	34.50	48.50	115.00	48.50	259.50	0.72	0.16	0.22	0.04	1.14
1000300069	Diamond Materials, LLC	SM	103.00	202.50	50.50	84.50	83.50	87.50	508.50	2.102	6.043	0.568	1.497	10.21
1000100001	Dover Air Force Base	TV	103.25	271.00	85.50	331.25	441.00	352.75	1481.50	15.593	0.534	0.423	13.673	30.22
1000100118	Dover Downs Gaming & Entertainment, Inc	SM	73.00	218.50	124.00	0.00	44.25	54.00	440.75	0.204	0.014	0.013	0.011	0.24
1000300011	DuPont Experimental Station	TV	298.50	523.25	305.25	329.00	331.00	89.75	1578.25	54.961	0.321	0.366	9.131	64.78
1000300051	DuPont Nutrition (Formerly FMC)	TV	1087.50	337.00	192.50	326.50	328.25	244.75	1429.00	21.426	12.674	0.180	2.549	36.83
1000300126	DuPont Specialty Products USA, LLC	TV	115.75	204.50	277.75	235.50	190.00	85.00	992.75	9.060	0.066	0.076	0.796	10.00
1000300506	DXC Technology Services, LLC	SM	0.00	5.75	27.00	0.00	0.00	16.00	48.75	0.621	0.044	0.041	0.033	0.74
1000500194	Eastern Shore Natural Gas - Bridgeville	SM	16.00	26.50	155.00	97.75	8.00	74.25	361.50	4.532	0.059	0.002	0.390	4.98
										Reflects Permitted Emission Values.				

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Appendix C: Facility Hours and Emissions History (Page 3 of 4): As the program transitions to 2021-2023 fee cycle, we provide the most current applicable hours and emissions data for each facility billed in 2020. Expanded reporting details for CY 2020 are available upon request.

Facility ID #	Company Name	Class	2020 Hours	2019 Hours	2018 Hours	2017 Hours	2016 Hours	2015 Hours	Total CY 2015-2019	2017 NO _x (TPY)	2017 PM ₁₀ (TPY)	2017 SO ₂ (TPY)	2017 VOC (TPY)	2017 Total
1000300462	Eastern Shore Natural Gas-Delaware City	SM	67.00	71.50	141.00	0.00	156.50	365.50	734.50	6.288	0.171	0.009	3.320	9.79
1000100127	Energy Center Dover, LLC	TV	259.50	442.00	307.25	99.75	109.25	232.00	1190.25	9.893	1.768	0.241	1.594	13.50
1000300822	First States Investors 5200	SM	3.00	37.25	1.00	0.00	0.00	25.50	63.75	0.313	0.022	0.021	0.017	0.37
1000300279	FMC Corporation Stine-Haskell Research Ctr.	TV	217.50	108.50	102.00	111.50	192.00	168.25	682.25	8.832	0.056	0.064	2.529	11.48
1000100245	Garrison Energy Center	TV	323.50	279.75	451.00	391.50	366.75	0.00	1489.00	43.870	31.170	3.700	1.585	80.33
1000300498	GE Energy - Newark, DE	SM	31.00	20.50	98.50	69.50	161.25	51.00	400.75	0.055	0.045	0.000	3.131	3.23
1000300622	GT USA Wilmington, LLC - Cranes (new)	TV	285.75						0.00	85.26	9.40	0.42	24.08	119.16
1000100099	HandyTube Corporation	TV	61.25	164.00	29.50	55.50	27.25	47.50	323.75	0.464	0.002	0.003	1.469	1.94
1000100024	Hanover Foods Corporation	SM	97.50	82.00	297.50	57.00	84.00	233.00	753.50	3.131	0.020	0.019	0.170	3.34
1000300367	Heritage-Crystal Clean, LLC (Closed, 2014 Emission Data)	SM	9.50	1.00	0.00	0.00	0.00	145.00	146.00	1.480	0.120	0.250	12.600	14.45
1000300934	Holland Mulch, Inc	SM	0.00	26.00	5.25	2.00	54.00		87.25	9.84	1.40	0.008	0.00	11.25
1000300899	Honeywell/City of Wilmington (REBF)	TV	173.00	226.00	305.75	526.00	251.00		1308.75	2.371	0.035	4.266	3.588	10.26
1000300508	Howard R Young Correctional Institution	SM	4.00	80.50	0.00	0.00	0.00	10.50	91.00	1.329	0.037	0.036	0.072	1.47
1000300087	IKO Production Wilmington Inc	SM	276.00	371.25	92.50	2.00	1.00	157.00	623.75	3.583	4.180	0.024	5.312	13.10
1000100011	ILC Dover, LP - Frederica	SM	136.00	11.50	21.50	17.00	34.50	29.00	113.50	0.000	0.000	0.000	3.907	3.91
1000500001	Indian River Power LLC	TV	516.00	502.00	344.25	317.50	638.00	265.25	2067.00	163.110	60.698	474.581	6.480	704.87
1000300090	James T Vaughn Correctional Center - Smyrna	SM	107.00	171.25	19.00	120.00	382.00	18.25	710.50	5.146	0.081	0.080	1.047	6.35
1000300686	JP Morgan Chase - 4001 Governor Printz Blvd	SM	2.50	2.00	30.50	0.00	0.00	0.00	32.50	5.840	0.300	0.110	1.490	7.74
1000300687	JP Morgan Chase - Bear Christiana Road	SM	17.50	18.00	0.00	50.50	74.50	63.00	206.00	6.800	0.260	0.081	0.900	8.04
1000300804	JP Morgan Chase - Morgan Christiana Center	SM	7.50	0.00	0.00	0.00	0.00	24.50	24.50	6.480	0.100	0.190	0.130	6.90
1000500066	Justin Tanks, LLC	TV	111.00	149.50	163.25	157.00	92.50	113.00	675.25	0.119	0.011	0.001	4.491	4.62
1000100007	Kraft Heinz Foods Inc	SM	0.00	0.00	0.00	149.50	252.50	0.00	402.00	1.525	1.445	0.022	1.103	4.10
1000300115	Kuehne Chemical Company	TV	133.50	184.50	4.00	38.00	148.75	320.75	696.00	1.541	0.003	0.005	0.031	1.58
1000300782	Liveo Research Inc	SM	261.25	145.25	26.00	0.00	44.50	41.50	257.25	1.818	1.124	0.011	1.819	4.77
1000300847	MAGCO Inc	SM	73.00	4.75	15.50	37.00	125.75	94.00	277.00	1.722	4.024	0.006	0.093	5.85
1000300803	McConnell Johnson - 1201 North Market	SM	29.50	4.00	0.00	0.00	5.00	65.00	74.00	0.438	0.010	0.029	0.023	0.50
1000300383	Medal L P, Air Liquide	SM	220.00	339.25	250.00	422.00	63.00	17.50	1091.75	2.807	0.016	0.033	16.062	18.92
1000100081	Metal Masters Foodservice Equipment Co.	SM	55.25	34.00	0.00	0.00	42.75	8.00	84.75	0.006	0.050	0.140	0.000	0.20
1000300516	Micropore, Inc	SM	56.00	43.75	2.00	0.00	0.00	14.75	60.50	0.000	0.000	0.000	3.940	3.94
1000300646	Middletown Materials, LLC	SM	54.25	122.25	3.00	346.50	52.25	16.00	540.00	5.184	0.365	0.341	0.276	6.17
										Reflects Permitted Emission Values.				

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Facility ID #	Company Name	Class	2020 Hours	2019 Hours	2018 Hours	2017 Hours	2016 Hours	2015 Hours	Total CY 2015-2019	2017 NO _x (TPY)	2017 PM ₁₀ (TPY)	2017 SO ₂ (TPY)	2017 VOC (TPY)	2017 Total
1000500036	Milford Wellness Center	SM	265.50	57.00	32.50	50.50	7.00	35.50	182.50	0.982	0.118	0.022	0.493	1.62
1000300919	New Haven Packaging, LLC	SM	18.00	1.25	4.00	5.75	83.50		94.50	0.778	1.141	0.005	0.043	1.966
1000300142	News Journal Company	SM	0.00	0.00	20.50	0.00	0.00	4.50	25.00	0.000	0.000	0.000	1.060	1.06
1000300324	Noramco Inc	TV	286.75	323.75	353.50	315.25	471.25	228.25	1692.00	1.483	0.015	0.018	0.701	2.22
1000500011	Orient Corporation Of America	SM	11.00	191.00	7.50	152.00	97.00	25.50	473.00	3.924	0.011	0.013	0.124	4.07
1000500093	OSG Ship Management, Inc	TV	95.50	7.00	120.00	29.00	111.50	68.25	335.75	0.112	0.000	0.003	36.691	36.81
1000500133	Pats Aircraft Systems	SM	4.00	5.00	190.00	72.50	79.00	40.00	386.50	0.038	0.001	0.002	0.646	0.69
1000100075	Perdue Foods LLC- Milford	SM	25.50	3.00	2.50	2.75	31.00	23.25	62.50	5.600	0.033	0.113	0.306	6.05
1000500003	Perdue Grain & Oilseed LLC - Bridgeville	SM	28.75	127.50	94.00	99.50	96.00	32.00	449.00	5.430	36.298	0.035	0.299	42.06
1000300166	Polymer Technologies, Inc.	SM	0.00	75.25	32.00	11.75	27.25	1.00	147.25	0.439	0.010	0.003	1.314	1.76
1000300509	Port Contractors	SM	0.00	40.50	63.00	11.00	56.50	14.00	185.00	0.000	0.006	0.000	0.000	0.01
1000300288	Prince Minerals, Inc	SM	0.00	84.00	77.50	91.00	146.00	57.00	455.50	0.356	0.461	0.032	0.029	0.88
1000300093	Printpack, Inc	TV	132.00	72.75	94.00	330.50	14.50	278.50	790.25	2.365	0.012	0.014	8.531	10.92
1000100004	Procter & Gamble Dover Wipes Company	SM	10.00	0.00	0.00	4.00	22.25	0.00	26.25	0.022	0.002	0.001	0.001	0.03
1000300906	PS-5 LLC (Community Education Building)	SM	0.50	3.50	1.25	3.50	115.75	24.75	148.75	12.692	0.068	0.078	0.701	13.54
1077700904	R & M Recycling	SM	0.00	0.00	10.50	55.50	0.00	9.00	75.00	0.515	0.149	0.001	0.027	0.69
1000500081	River II LLC	SM	10.50	25.00	0.00	115.50	26.50	102.00	269.00	0.432	0.009	0.011	0.099	0.55
1000300059	Rogers Corporation	SM	43.50	134.00	101.00	88.00	3.50	41.00	367.50	1.960	3.517	0.012	4.291	9.78
1000300033	Rohm & Haas Electronic Materials,Cmp,Inc	TV	387.50	70.25	188.00	599.00	646.50	642.00	2145.75	3.353	0.080	0.063	6.213	9.71
1000500009	Sea Watch International, Ltd	SM	33.00	21.00	20.50	20.00	22.50	30.00	114.00	5.210	0.027	0.031	0.287	5.56
1000300125	Siemens Healthcare Diagnostics - Glasgow	SM	5.00	132.50	143.00	104.50	91.50	189.00	660.50	8.465	0.129	0.128	0.460	9.18
1000500021	SPI Pharma, Inc	SM	67.50	36.50	34.00	61.00	95.00	41.00	267.50	2.804	0.090	0.022	0.151	3.07
1000300133	St Francis Hospital	SM	0.00	31.50	0.00	73.25	0.00	0.00	104.75	3.195	0.018	0.025	0.176	3.41
1000300930	Stratus Visuals LLC	SM	0.00	24.00	34.50	19.50	134.75		212.75	0.000	0.000	0.000	1.558	1.56
1000300021	Sunoco Partners Marketing & Terminals LP	TV	231.00	212.25	136.00	208.50	696.50	285.25	1538.50	3.980	0.002	0.030	38.820	42.83
1000300482	Transflo Terminal Service, Inc	SM	82.00	22.00	9.00	55.00	0.00	36.25	122.25	0.000	0.053	0.000	0.010	0.06
1000100259	Tri-County Materials, LLC	SM	16.00	141.25	33.00	155.00	0.50	110.75	440.50	2.630	2.960	0.290	3.730	9.61
1000300022	University Of Delaware, Newark	TV	174.00	157.50	108.50	60.25	210.00	121.00	657.25	19.758	0.377	0.291	4.252	24.68
1000300673	Veolia (Chemours Company Red Lion)	TV	275.00	456.50	460.00	269.50	77.25	57.25	1320.50	18.911	0.043	55.943	0.727	75.62
1000300806	VeriSign Inc	SM	31.75	0.00	0.00	0.00	0.00	53.25	53.25	0.290	0.013	0.001	0.011	0.32
1000100152	Warren F Beasley Power Station (DEMEC)	TV	304.50	304.00	249.50	379.00	755.50	227.50	1915.50	4.048	1.299	0.084	0.231	5.66
1000300389	Wilmington Wastewater Treatment Plant	TV	64.25	232.00	18.50	93.75	64.50	212.75	621.50	4.500	0.081	0.697	0.592	5.87
										Reflects Permitted Emission Values.				