

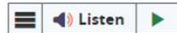


DELAWARE DEPARTMENT OF  
**NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL**

October 24, 2023  
Community Information Session



# Environmental Justice at DNREC



Environmental justice seeks equity for minority and low-income communities that may be disproportionately exposed – and vulnerable – to adverse environmental impacts. Simply put, practicing environmental justice ensures that everyone has an equal seat at the table where decisions are made.

### Help Us Make These Pages More Useful

We want to provide information and links that are most useful to you. We want these pages to foster meaningful participation on environmental justice issues. Please, [share your thoughts with us](#).

This page is available [An Kreyòl Ayisyen](#) and [En Español](#) via [Google Translate](#) which can provide automated translations of web pages. Note that this is an external resource that is outside of DNREC's control.

### Community Resources



### Data and Information



### Public Participation



# Agenda

- Welcome and Opening Remarks
- Division of Air Quality Presentation
- Noramco Presentation
- Community Representative Questions
- Question and Answer Session



DELAWARE DEPARTMENT OF  
**NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL**

# Meeting Conduct

- DNREC is committed to facilitating an environment of mutual respect, safety, and productive dialogue.
- Harassment, discrimination, intimidation, inappropriate language, inappropriate images, and disruption of the meeting will not be tolerated.
- All participants including panelists, presenters, and attendees are expected to conduct themselves in a respectful, professional, and civil manner.



DELAWARE DEPARTMENT OF  
NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL



DELAWARE DEPARTMENT OF  
**NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL**

# Air Permit Introduction

# What does the Division of Air Quality (DAQ) review in a permit application?

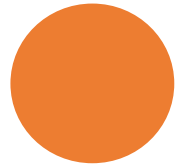
- Zoning approval
- Emission calculations
- Regulation review
- Modeling
- DNREC will go back to the company and request changes if the information submitted is incomplete or does not meet regulatory requirements
- DNREC will not move forward to legal notice on an application that does not meet regulatory requirements



DELAWARE DEPARTMENT OF  
NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL

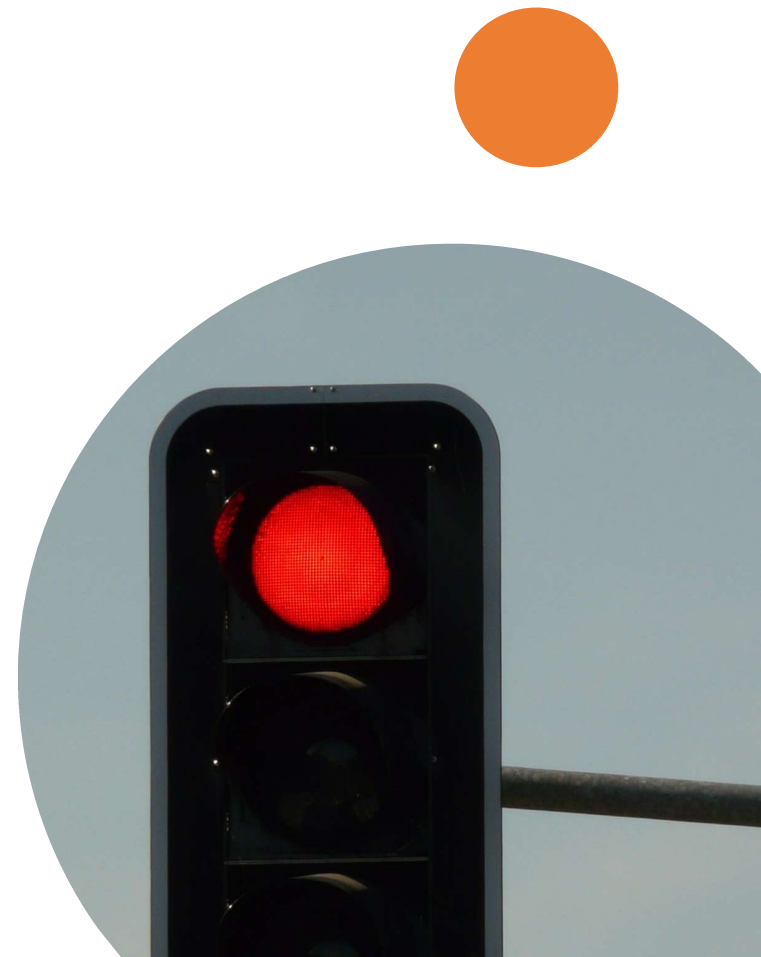
# DAQ Can...

- Incorporate conditions into permits based on technical comments regarding the pending permit that are made during the public process.
- Answer questions regarding the information in a permit application or permit.



# DAQ Cannot...

- Make zoning determinations. All zoning decisions are made by the county or local municipality.
- Limit road access. DAQ does what we can to encourage facilities to control and direct their traffic to minimize disturbances.
- Deny permits without cause. Permits are issued based on the regulatory requirements that are in place at the federal and state level.



# Confidentiality

## **May Be Held Confidential**

- Personnel Records
- Trade Secrets
- Matters of Public Safety

## **May Not Be Held Confidential**

- Emissions



DELAWARE DEPARTMENT OF  
**NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL**

# How Does DAQ Protect the Public?

- Before any permit is issued, computer modeling is conducted to ensure that no negative health effects will occur
- Modeling tools provide a maximum downwind concentration (MDC)
  - The MDC is the modeled concentration of a pollutant found beyond the facility based upon how the stack is configured
- The MDC is then compared to scientifically determined acceptable exposure limits with a large safety factor to account for different ages, health conditions, genders and body types.



DELAWARE DEPARTMENT OF  
NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL

# How Does DAQ Monitor Facilities?

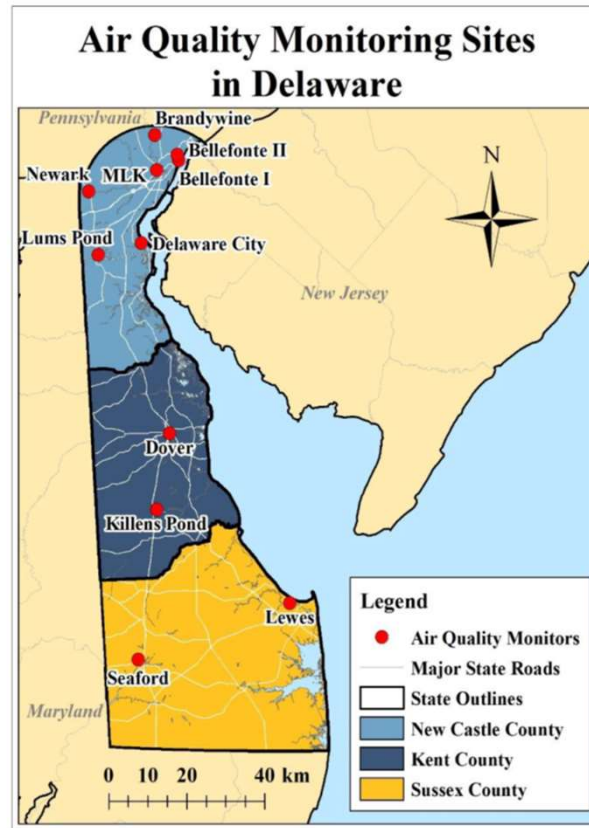
- Once a permit is issued, DAQ conducts routine follow up activities to ensure that the facility is meeting all requirements:
  - Inspections
  - Report reviews
  - Emission Inventory
  - Stack Tests
- When non-compliance is determined DAQ will conduct enforcement actions to get the facility back into compliance.
  - Notice of Violation
  - Secretary's Order



DELAWARE DEPARTMENT OF  
NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL

# How Does DAQ Monitor Ambient Air?

- DAQ operates monitoring stations across Delaware
- These stations measure concentrations of pollutants in the ambient air
- There is a monitoring station at Martin Luther King Boulevard



# Air Monitoring Data

- Some of the data is available at the website below. This website works best on a computer.
- <https://airmonitoring.dnrec.delaware.gov/>
- Delaware's ozone and PM<sub>2.5</sub> data are linked to EPA's Air Now website and app. (airnow.gov)



DELAWARE DEPARTMENT OF  
NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL

# Air Tox Screen

- EPA has developed a tool called Air Tox Screen that shows the cancer risk associated with emissions in local communities
- EPA considers any risk greater than 100 in 1,000,000 as requiring action
- <https://www.epa.gov/AirToxScreen>
- The area around Noramco is considered lower risk at 30 in 1,000,000



DELAWARE DEPARTMENT OF  
NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL

2019 Cancer Risk

2018 Cancer Risk

2017 Cancer Risk

2019 Noncancer Hazards

## AirToxScreen Mapping Tool (based on 2019 emissions)

Zoom to State(s)  
Delaware

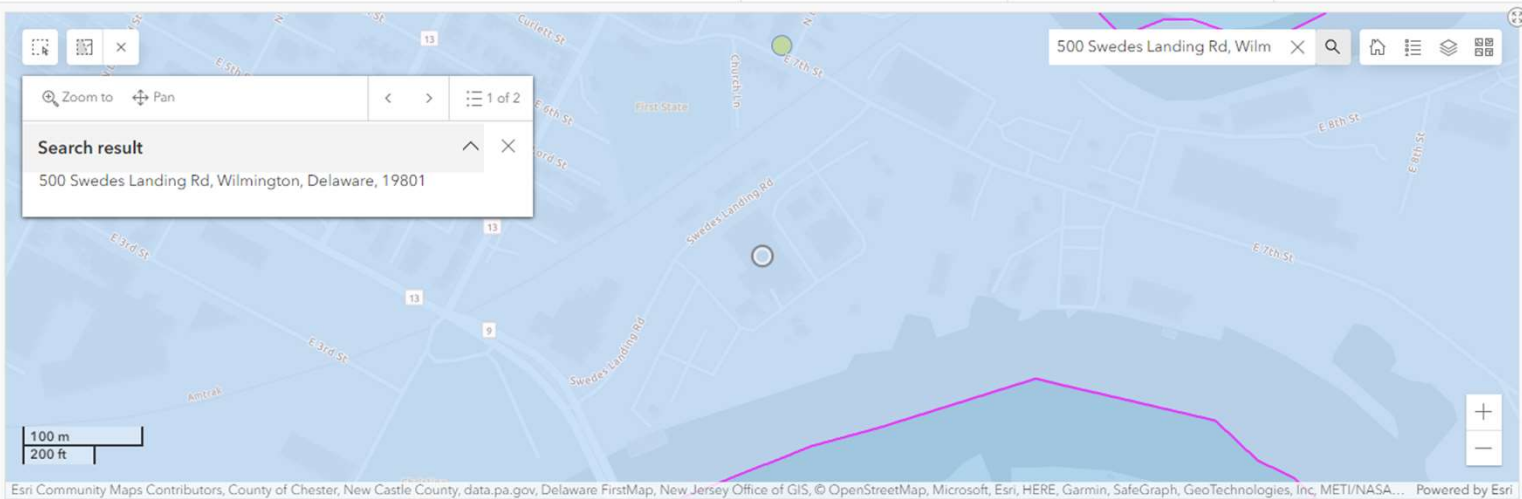
Zoom to County(s)  
None

Select Minimum Risk to Include  
No number selected

Select Only Tracts With Chan...  
None

### To get started:

- Select tract(s) on map using selector tool in upper left corner of map. When tract(s) are selected, associated lists and charts will appear under the map.
- Zoom to a specific area using the search tool in the upper right of map by typing in a place name or by using the State and County selector tools above the map.
- Filter tracts by risk level using the Risk Level selector tool above the map.
- Filter tracts with risk changes since the analysis was performed by using the Risk Change selector tool at the upper right of the dashboard. To display a popup containing more information about the risk change, click on the tract without



### Legend

Tract Changes (click in the tract for more info)

### Cancer Risk (2019)



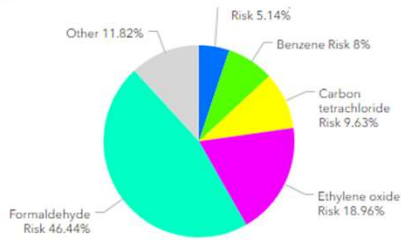
### Tract Location Data

Search...

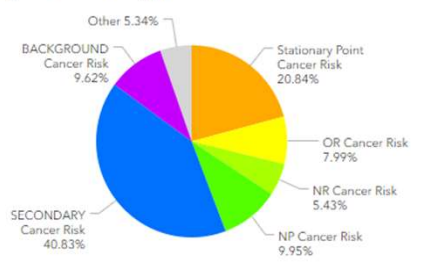
EPA Region: EPA Region 3  
State: DE  
County/Parish: New Castle County  
Tract ID: 10003002900  
Total Risk (per million): 30  
Area (m2): 1,406,713  
Population (2010 Census): 3,570

Location   Air Toxic   Source

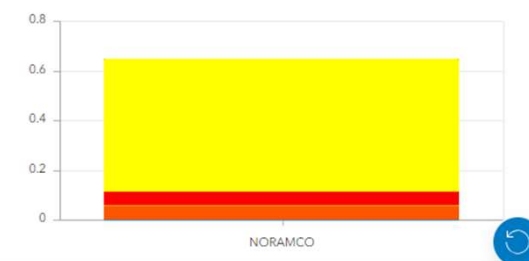
### Risk by Air Toxic



### Risk by Source Type



### Facility Emissions (tons)



# Noramco Background

- Noramco makes medications including controlled substances for many different needs
- Noramco is requesting a construction permit to install a new vacuum pump to support a new production line and two new products
  - The new production line will manufacture intermediates for a medication prescribed to support patients undergoing treatment for cancer, HIV, and anorexia.



DELAWARE DEPARTMENT OF  
NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL

# Facility Wide Permit

- Noramco operates under a Facility-Wide Title V Permit
- Facility wide rolling 12-month total emissions are limited to:
  - 20.1 tons per year of volatile organic compounds (VOCs)
  - 10.7 tons per year of combined hazardous air pollutants (HAPs)
  - 9.9 tons per year of individual HAPs
- Noramco is not requesting an increase to Facility Wide emissions



# Actual Emissions

- Noramco calculates emissions based on a maximum number of batches per year.
- Actual emission are much lower than permitted emissions because there are processes that cannot be run at the same time.
- The Facility-Wide actual emissions for 2021 and 2022 are shown in the table below:

Pollutant	Actual 2021 Emissions (tons)	Actual 2022 Emissions (tons)
Total Volatile Organic Compounds (VOCs)	1.5	1.48
Total Hazardous Air Pollutants (HAPs)	0.55	0.88



DELAWARE DEPARTMENT OF  
**NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL**

# Controlled Emissions

- Emissions from the proposed process are directed to one of two control devices
  - Caustic Scrubber (Destruction Efficiency = 93%)
  - VARA Carbon Adsorber (Destruction Efficiency = 95%)
- The total controlled emissions from each step in the proposed process (D8 and D9) are shown in the table below:

Pollutant	D8 Controlled Emissions (tons/year)	D9 Controlled Emissions (tons/year)	Total Controlled Emissions (tons/year)
Volatile Organic Compounds (VOCs)	0.13	0.36	0.50
Hazardous Air Pollutants (HAPs)	0.08	0.14	0.22



# Q&A Guidelines

- Live participants will be called on based upon the meeting sign-in sheet
- Participants on Zoom will have the opportunity to ask questions via the Q&A
- Each participant will have 3 minutes for their question
- We will alternate between live and virtual participant questions
- Questions and comments received tonight are not part of the public hearing record
- To officially submit comments to the record please see the details available at:  
<https://dnrec.alpha.delaware.gov/public-hearings/>



DELAWARE DEPARTMENT OF  
**NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL**