

5/13/2020

MEMORANDUM

TO: Angela D. Marconi, P.E., BCEE *ADM*

THROUGH: Joanna L. French, P.E. *JLF*

FROM: Melanie A. Smith, P.E. *MAS*

**SUBJECT: Croda, Inc.
Atlas Point Site
Draft/Proposed Permit: APC-2020/0070-CONSTRUCTION (FE)
Blend Drumming Tank C**

DATE: May 12, 2020

BACKGROUND INFORMATION

Croda, Inc. requested a Construction Permit for a PIP (manufacturer) 12,000 gallon Blend Drumming Tank 28-5111, Emission Unit 2, in an application dated January 16, 2020. Product will be transferred from existing Blend Tanks A and B to the drumming tank. Material is either drummed, toted, or transferred to a storage tank, tank truck, or rail car. The addition of the drumming tank will allow for increased throughput for the Blend Tanks. For the drumming tank, potential emissions are below 15 pounds/day, and a control device is not required per 7 **DE Admin. Code** 1124 Section 1.2.1. Croda will remain below the facility-wide VOC limit of 20 TPY.

Croda will also be constructing a 23,000 gallon PIP storage tank 28-7027, for Atplus Destiny. Atplus Destiny is the product name. The tank has a conservation vent. Worst case potential emissions are less than 0.2 pounds per day and are exempt from permitting per 7 **DE Admin. Code** 1102 Section 2.2.2.

The Company specializes in additives for surface modification of plastics, including friction reduction (slip agents), anti-blocking, anti-static, anti-fogging/wetting, dispersion technology and nano-particulate UV absorbers. Raw materials are reacted in pressurized vessels and autoclaves under controlled pressure and temperature. Some material is further processed in dryers and strippers. Several hot oil heaters provide temperature control for the processes. Production areas include the Blend Tank Area (Blend Tanks A & B), the Spray Tower, the Kettle Area (4 & 7 Kettles), the Autoclave Area (3, 4A, 5, and 6 Autoclaves), and the Multi-purpose Plant. Ethylene oxide and propylene oxide are received, stored, and distributed from a central storage area.

The Ethylene Oxide Plant is a multi-step continuous process to produce ethylene oxide from ethanol. Ethylene oxide (EO) is used as a raw material in manufacturing surfactants and other intermediate materials. Major emitting equipment includes an ethanol dehydration furnace, a catalytic oxidizer to control emissions from the carbonate regenerator and two EO storage tanks. Side-streams include technical grade mono-ethylene glycol, polyglycols, and by-product carbon dioxide. Other sources of emissions include an ethyl chloride chemical addition pot, start-up/shutdown activities, storage tanks, an emergency generator, three fire pumps, and fugitive sources.

Emissions from the production areas are controlled through the use of vent condensers, cyclone separators, venturi scrubbers, and baghouse filters. Croda Inc. conducts semi-annual Leak Detection and Repair (LDAR) inspections of the Ethylene Oxide and Propylene Oxide Storage area in accordance with 40 CFR Part 63 Subpart UU "National Emission Standards for Equipment Leaks – Control Level 2 Standards". In addition, the Company is subject to a Plantwide Applicability Limit (PAL) for NO_x of 54 TPY.

Croda operates two powerhouse boilers to provide process and heating steam to the facility. Boiler 3 operates on natural gas and No. 2 fuel oil. Boiler 5 operates on landfill gas, natural gas and No. 2 fuel oil.

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Emission Units	Emission Unit Description
EU 103	Boiler No. 3 – 75 MMBTU/hr heat input, fired on natural gas and No. 2 fuel oil
EU 108	Boiler No. 5 – 84 MMBTU/hr heat input, fired on landfill gas, natural gas, and No. 2 fuel oil
EU 105	Temporary Boiler – fired on No. 2 fuel oil and natural gas
EU 2	Blend Drumming Tank C, vented to atmosphere
EU 3 & 4	Blend Tank Area – two blend tanks A and B, vented to the atmosphere
EU 5	Spray Tower Cyclone Separator (Barr & Murphy) – 11,800 scfm
EU 6	Spray Tower Packed Scrubber – 3.2 gpm, 244 scfm
EU 6A	Spray Tower Feed Tank – vented to atmosphere
EU 13	3A and 4 Autoclave Hotwell – vented to atmosphere
EU 14	3A and 4 Deodorizer Hotwell – vented to atmosphere
EU 15	4 Kettle Fume Spray Condenser – 22 scfm
EU 16	5 Autoclave Ejector Scrubber (Croll Reynolds) – 45 gpm, 14 scfm
EU 18	5 Autoclave Fume & Dust Scrubber (Croll Reynolds) – 15 gpm, 835 scfm
EU 19	5 Autoclave Deodorizer Hotwell – vented to atmosphere
EU 20	7 Kettle Spray Condenser – 105 gpm, 2100 scfm
EU 23	EO/PO Storage Area Scrubber (Croll Reynolds) – 1 gpm, 100 scfm
EU 26	6 Autoclave Scrubber (Croll Reynolds)- 38 gpm, 106 scfm
EU 31 through EU 35	Unloading Station Tanks
MP1EU 1	Multipurpose Plant R-3100 Reactor Condenser (Yula) – 140 °F vent discharge
MP1EU 2	Multipurpose Plant R-3200 Reactor Condenser Vent (Rubicon Industries) – 140 °F vent discharge
MP1EU 3	Multipurpose Plant R-3300 Reactor Condenser Vent (Rubicon Industries) – 100 °F vent discharge
MP1EU 4	Multipurpose Plant R-3400 Reactor Condenser Vent (Rubicon Industries) – 140 °F vent discharge
MP1INV 15	Multipurpose Plant Solid Mix Tank – vented to atmosphere
MP1INV 18, 19, 20, 30	Multipurpose Plant Vacuum Pumps – vented to atmosphere
MP1EU 21	Laminar Flow Booth – vented to atmosphere
28-7000, 28-7001, 28-7002, 28-7004, 28-7010, 28-7011, 28-7013, 28-7015, 28-7016, 18-7017	Tank Farm
INV270, INV 271, INV272, & INV273	No. 2 Fuel Oil Fired Emergency Generators – INV270: Main Guardhouse, INV271: Flammable Warehouse, INV272: IT Generator, & INV273 – EO/PO
EU 106 & EU 107	Two 1100 KW landfill gas fired distributed generators
EU 504	Ethanol Dehydration Furnace B-1210, 12.47 MMBTU/hr, fired on natural gas and landfill gas
EU 505	Carbonate Regenerator, process CO ₂ recovery unit
CD 505	Catalytic Combustion Unit U-240, 0.81 MMBTU/hr, fired on natural gas

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Emission Units	Emission Unit Description
EU 506	Ethylene Oxide Storage Tank D-1410A, 30,000 gallons
EU 507	Ethylene Oxide Storage Tank D-1410B, 30,000 gallons
CD 506	Scrubber T-330, ethylene oxide emissions from storage tanks
EU 508	Ethyl Chloride Chemical Addition Pot D-141
	Ethylene Purification Column T-1290
	300 kW Emergency Generator, fired on No. 2 fuel oil
	Two (2) 350 HP Fire Pumps G-1501 and G-1502, one (1) existing 235 HP Fire Pump, all fired on No. 2 fuel oil
	Lab Hoods
	Ethanol Storage Tank F-1201, vertical fixed roof, 50,000 gallons
	Ethanol Storage Tank F-1202, vertical fixed roof, 50,000 gallons
	Ethanol Blowdown Tank F-1203, vertical fixed roof, 10,000 gallons
	Drying Column Hotwell F-610
	Crude Ethylene Glycol Tank F-615, 5,000 gallons
	Two (2) Glycol Product Receiver Tanks D-620A and D-620B
	Heavy Glycol Tank D-630
	Propylene Glycol Tank F-1261, 200 gallons
	Propylene Glycol Tank F-1430, 1,000 gallons
	MEG Product Storage Tank F-651

The source does not have major source status for NSR, PSD, or Air Toxics.

Pollutant	Facility Wide PTE (tons/year)	Major Source Threshold (tons/year)
Nitrogen Oxides (NO _x) ¹	66.36	25
Volatile Organic Compounds (VOCs) ²	31.19	25
Carbon Monoxide (CO)	134.94	100
Particulate Matter (PM)	14.10	100
Particulate Matter Less Than 10 Microns (PM ₁₀)	14.40	100
Particulate Matter Less Than 2.5 Microns (PM _{2.5})		100
Sulfur Dioxide (SO ₂)	22.60	100
Lead		10
Carbon Dioxide Equivalent (CO _{2e})	234,244	100,000
Other (HAP)	14.85	

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1. The NOx PAL limit is 54 TPY.
2. The VOC cap is 20 TPY.

The source is major for NOx, VOC, CO, and CO₂. The permit will be advertised for 30 days to be federally enforceable and will be incorporated into the Title V Permit by administrative amendment.

The Company has not requested confidentiality.

The Company is located within the Coastal Zone. On October 23, 2019, during a conversation between Croda and Erin Wilson of DNREC Coastal Zone Program, it was determined that a Coastal Zone Permit was not required for this project. The drumming tank is excluded for tanks farms less than five acres per 7 **DE Admin. Code** 101 Section 5.1.3.

The Company is current with their annual fees and has paid appropriate construction application fees.

TECHNICAL INFORMATION

The Drumming Tank increases throughput for the two Blend Tanks, from 250 batches/year (per tank) to 325 batches/year. This new tank is not a new blend tank. It is not necessary for every batch to go through the new drumming tank, although it is possible that each one could. In addition to drumming, it is possible for products to be sent to storage tanks, tank trucks, railcar, or totes. The emissions from all 3 tanks were assumed to be the same, worst case.

The Blend Drumming Tank has a conservation vent. Blend Tanks A and B, Drumming Tank C, process vessels 28-5002, 28-5003, 28-5004, 28-5005, 28-5006, and the Atplus Destiny Tank are loaded. The tanks are heated, agitated and the batch is held. Material is either drummed, toted, or transferred to a storage tank, tank truck, or rail car.

The wording of the draft/proposed construction Permit follows the Title V Permit with three exceptions. The Department agreed to monitor and record VOC emissions by engineering calculations rather than emission demonstrations. This is in keeping with the corresponding conditions in the HAP section. VOC/HAPs, Total HAPs, and Dioxane emissions are to be recorded each month in a rolling twelve (12) month format. The Title V Permit includes the following condition changes:

Title V Condition 3- Table 1	Title V Wording	Drumming Tank Construction Permit
(d)(1)(ii)(A)(1)	<i>VOC</i> 2.9 pounds per batch, average	2.3.1 <i>VOC/HAPs</i> 58 pounds per batch, per tank, and 1.090 tons in any twelve (12) month rolling period, all tanks total.
(d)(2)(ii)(A)(1)	<i>Total HAPs</i> 1.7 pounds per batch	2.3.2 <i>Total HAPs</i> 9.2 pounds per batch, per tank, and 0.522 tons in any rolling twelve (12) month period, all tanks total.
(d)(2)(ii)(B)(1)	<i>Dioxane</i> 1.7 pounds per batch	2.3.3 <i>Dioxane</i> 3.5 pounds per batch, per tank, and 0.505 tons in any rolling

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Title V Condition 3- Table 1	Title V Wording	Drumming Tank Construction Permit
		twelve (12) month period, all tanks total.
(d)(1)(vi)(D)(1)	VOC Emissions shall be calculated using emissions demonstrations and data from production logs.	4.5.1 VOC and HAP Emissions shall be calculated using engineering calculations and data from production logs.
(d)(1)(ix)(B)	Emissions demonstrations for each product or product family manufactured or processed in the Blend Tank Area demonstrating compliance with the emission limitations of Condition 3- Table 1(d)(1)(ii) of this permit.	5.4 Engineering calculations for each product or product family manufactured or processed in the Blend Tank Area demonstrating compliance with the emission limitations of Condition 2.3.

Potential To Emit

Blend Tank A, Blend Tank B, and Drumming Tank C are assumed to have identical emissions. Data was provided by Croda.

Pollutant	Max lb/batch	Max lb/hr	Weighted Average lb/batch	Weighted Average lb/hr	PTE₈₇₆₀ (TPY)
Dioxane	3.52	0.88	1.04	0.26	1.14
IPA	5.46	1.36	0.04	0.009	0.039
Methanol	7.09	1.77	0.03	0.008	0.035
Napthalene	0.19	0.05	0.003	0.001	0.004
VOC (w/o HAP)	47.12	11.78	1.17	0.29	1.27
HAPs	9.17	2.29	1.07	0.27	1.18
Total VOC	57.92	14.48	2.24	0.56	2.45

Permitted Emissions

Though the emissions from the Drumming Tank are not known, we do know emissions would not be greater than one of the Blend Tanks. The sum of three identical tanks is considered worst case.

Pollutant	Max lb/batch	Max lb/hr	Weighted Average lb/batch	Weighted Average lb/hr	TPY per tank¹	Sum TPY Three Tanks
Dioxane-HAP	3.52	0.88	1.04	0.26	0.17	0.505
IPA	5.46	1.36	0.04	0.009	0.006	0.018
Methanol-HAP	7.09	1.77	0.03	0.008	0.005	0.015
Napthalene-HAP	0.19	0.05	0.003	0.001	0.001	0.002
VOC (w/o HAP)	47.12	11.78	1.17	0.29	0.19	0.570
HAPs	9.17	2.29	1.07	0.27	0.17	0.522

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Pollutant	Max lb/batch	Max lb/hr	Weighted Average lb/batch	Weighted Average lb/hr	TPY per tank ¹	Sum TPY Three Tanks
Total VOC	57.92	14.48	2.24	0.56	0.36	1.090

1. (weighted average lb/batch x 325 batches/yr)/2000 lb/T

Emission Unit ID	Emission Unit Description	Impacted By Project?	How Impacted?
2, 28-5111	C Drumming Tank, 12,000 gal	Yes	New
3, 28-5109	A Blend Tank, 10,000 gal	Yes	Debottlenecked
4, 28-5110	B Blend Tank, 10,000 gal	Yes	Debottlenecked
Tank 28-5002	50,000 gal	No	
Tank 28-5003	103,000 gal	No	
Tank 28-5004	25,000 gal	No	
Tank 28-5005	25,000 gal	No	
Tank 28-5006	25,000 gal	No	
Tank 28-7027	Atplus Destiny Storage Tank, 23,000 gal	Yes	New

The Potential to Emit for the Atplus Destiny Tank is based on 867,834 gal/year or 32 turnovers (0.0021 TPY). Actual throughput is 230,000 gal/year or 10 turnovers (0.0007 TPY). Baseline emissions for Blend Tanks A and B came from 2015 Annual Air Emission Inventory and Emissions Statement Report.

Pollutant	Baseline Period 2015-2019	Baseline Actual Emissions (tons/yr)	Post Change Potential to Emit (PTE) (tons/yr)	Emissions Increase (tons/yr)	Significance Level (tons/yr)	Significant Increase? (yes/no)
Emission Unit ID: 2 Drumming Tank C						
NO _x		0	0	0	25	No
VOCs		0	0.36	0.36	25	No
CO		0	0	0	100	No
PM		0	0	0	25	No
PM ₁₀		0	0	0	15	No
PM _{2.5}		0	0	0	10	No
SO ₂		0	0	0	40	No
Lead		0	0	0	0.6	No
CO _{2e}		0	0	0	75,000	No
Other (HAP)		0	0.17	0.17		
Emission Unit ID: 3 Blend Tank A						
NO _x		0	0	0	25	No
VOCs		0.051	0.36	0.31	25	No
CO		0	0	0	100	No
PM		0	0	0	25	No
PM ₁₀		0	0	0	15	No
PM _{2.5}		0	0	0	10	No
SO ₂		0	0	0	40	No

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Pollutant	Baseline Period 2015-2019	Baseline Actual Emissions (tons/yr)	Post Change Potential to Emit (PTE) (tons/yr)	Emissions Increase (tons/yr)	Significance Level (tons/yr)	Significant Increase? (yes/no)
Lead		0	0	0	0.6	No
CO _{2e}		0	0	0	75,000	No
Other (HAP)		0	0.17	0.17		
Emission Unit ID: 4 Blend Tank B						
NO _x		0	0	0	25	No
VOCs		0.051	0.36	0.31	25	No
CO		0	0	0	100	No
PM		0	0	0	25	No
PM ₁₀		0	0	0	15	No
PM _{2.5}		0	0	0	10	No
SO ₂		0	0	0	40	No
Lead		0	0	0	0.6	No
CO _{2e}		0	0	0	75,000	No
Other (HAP)		0	0.17	0.17		
Emission Unit ID: Atplus Destiny Storage Tank						
NO _x		0	0	0	25	No
VOCs		0	0.0007	0.0007	25	No
CO		0	0	0	100	No
PM		0	0	0	25	No
PM ₁₀		0	0	0	15	No
PM _{2.5}		0	0	0	10	No
SO ₂		0	0	0	40	No
Lead		0	0	0	0.6	No
CO _{2e}		0	0	0	75,000	No
Other (HAP)		0	0	0		

Netting Discussion

The contemporaneous time period is 2015 to 2019. Projects include the 2.1 MW CHP, the temporary boiler, the EO Plant, the three stage hybrid ejector/liquid ring vacuum pump in MP1, 4A Autoclave, 4A Deodorizer, 3A Autoclave, 3A Deodorizer, hotwells, and vacuum systems' tie in to Scrubber EU28, and 6 Autoclave and Scrubber (EU26).

The EO Plant actual emissions table (permitted or normal emissions based on 8,760 hours/year and Facility Wide Potential to Emit (Rev. 1) memo dated March 31, 2020) is shown below:

Source	VOC (TPY)	SO_x (TPY)	NO_x (TPY)	CO (TPY)	PM₁₀ (TPY)	PM_{2.5} (TPY)	HAP (TPY)	EO (TPY)
EtOH Tanks	0.19	0	0	0	0	0	0	0
Hot Well	0.0034	0	0	0	0	0	0.0034	0
Antifoam Tk ¹	0.22	0	0	0	0	0	0	0
E. Glycol Tk ¹	0.01	0	0	0	0	0	0.01	0
Glycol Product	0.008	0	0	0	0	0	0	0

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Source	VOC (TPY)	SOx (TPY)	NOx (TPY)	CO (TPY)	PM ₁₀ (TPY)	PM _{2.5} (TPY)	HAP (TPY)	EO (TPY)
Receivers ¹								
D-630 Heavy Glycol ¹	0.004	0	0	0	0	0	0	0
Propylene Glycol Chillers ¹	0.0033	0	0	0	0	0	0	0
MEG Finish Product Stg. Tk ¹	0.004	0	0	0	0	0	0.004	0
EDF	4.4	0.014	1.4	2.0	0.18	0.18	1.2	0
Catalytic Comb.	0.11	0.0021	0.35	0.29	0.026	0.026	0.0127	0.0061
EO Tks & EO Scrubber	0.29	0	0	0	0	0	0.29	0.29
EChlor. Pot	0.0183	0	0	0	0	0	0.0183	0
Emerg. Engines- EO Plant ²	0.44	0.48	3.48	1.62	0.20	0.20	0.009	0
Fugitives	1.0	0	0	0	0	0	0.3	0.1
Total	6.70	0.50	5.23	3.91	0.41	0.41	1.85	0.40

1. Refer to EO Plant permit application for insignificant activities. Antifoam tank 1.2 lb/day VOC; ethylene glycol tank 0.053 lb/day EG; glycol product receivers 0.044 lb/day glycols; D-630 heavy glycol tank 0.022 lb/day heavy glycols; propylene glycol chillers 0.018 lb/day PG; MEG finished product storage tank 0.022 lb/day EG.

2. 464 HP emergency generator, 350 HP fire pump, 350 HP fire pump, 235 HP fire pump

Emission Unit	Increases or Decreases (TPY)								
	NOx	VOCs	CO	PM	PM ₁₀	PM _{2.5}	SO ₂	Lead	NH ₃
105-temp. boiler ¹	0	0	0	0	0	0	0	0	0
EO Plant	5.23	6.70	3.91	0.41	0.41	0.41	0.50	0	0
MP1INV30 ²	0	0	0	0	0	0	0	0	0
CHP 3	3.94	3.29	2.76	2.25	2.25	2.25	0.28	0	0.030
Scrubber EU28 ³	0	0.035	0	0	0	0	0	0	0
Scrubber EU26 ⁴	0	0.35	0	0	0	0	0	0	0
Blend Tank A/B/C ⁵	0	1.09	0	0	0	0	0	0	0
Atplus Destiny Tank	0	0.0007	0	0	0	0	0	0	0
Total	9.17	11.47	6.67	2.66	2.66	2.66	0.78	0.00	0.03
Significance Level (ton/yr)	25	25	100	25			40	0.6	

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Emission Unit	Increases or Decreases (TPY)								
	NO _x	VOCs	CO	PM	PM ₁₀	PM _{2.5}	SO ₂	Lead	NH ₃
Increase (yes/no)	No	No	No	No	No	No	No	No	No

1. Temporary boiler only runs if Boiler 3 or Boiler 5 fails; the emissions for the temporary boiler are off-set by the lack of emissions from the boiler that is not operating.
2. MP1 INV30, Multi-Purpose Plant liquid ring vacuum pump for the Lubricant Ester Plant, did not increase emissions and the emissions limitations for the process remained the same.
3. The November 2019 stack test result for VOC for the new scrubber (EU28) was 0.032 lb/batch x (1000 + 1200 batches/yr from Facility Wide Potential to Emit (Rev. 1) memo)/2000= 0.035 TPY VOC.
4. The construction-to-operation inspection for 6 Autoclave and Scrubber (EU26) was conducted March 10, 2015. The federally enforceable permits were added to the Title V on December 2, 2015. Emissions of 0.35 TPY VOC were based on the Facility Wide Potential to Emit (Rev. 1) memo.
5. The drumming tank allows production to increase from 250 batches/year to 325 batches/year. The project will emit 1.09 TPY VOC and 0.522 TPY HAPs total.

Prevention of Significant Deterioration (PSD)/Non-Attainment New Source Review (NSR)

The major source threshold under PSD permitting program is a potential to emit (PTE) of greater than or equal to 100 TPY of any criteria pollutant for which the area is in attainment of the National Ambient Air Quality Standards (NAAQS). Based on prior permit revisions such as conversion of the boilers from No. 6 fuel oil to No. 2 fuel oil, and implementing limits on fuel oil use, the facility-wide PTE does not exceed 100 TPY for the criteria pollutants for which the area is in attainment of the NAAQS. The Facility is not a major source under the PSD permitting program. Furthermore, the potential emissions from the project alone are not expected to exceed the applicable PSD significance levels for any pollutant.

New Castle County is in attainment for the ozone NAAQS. The pollutants that could trigger NSR are NO_x and VOC as ozone precursors. The Facility will comply with, and not change, the existing NO_x PAL and, therefore, will not trigger NSR for NO_x. The net emissions increase for VOCs (including changes made during the contemporaneous period) shown in the table above does not trigger NSR for VOC.

AERSCREEN Dispersion Modeling

AERSCREEN could not be run because there is no forced airflow through the conservation vents of the drumming tank or the Atplus Destiny Tank.

REGULATORY REVIEW

- X 7 DE Admin. Code 1102: Permits
- X 7 DE Admin. Code 1114: Visible Emissions
- X 7 DE Admin. Code 1119: Control of Odorous Air Contaminants
- 7 DE Admin. Code 1120: New Source Performance Standards
- 7 DE Admin. Code 1124: Control of Volatile Organic Compound Emissions
- 7 DE Admin. Code 1125: Requirements for Preconstruction Review
- X 7 DE Admin. Code 1130: Title V State Operating Permit Program
- 7 DE Admin. Code 1138: Emission Standards for Hazardous Air Pollutants for Source Categories

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7 DE Admin. Code 1102: *Permits* is applicable because the Blend Drumming Tank has the potential to emit more than 10 pounds of VOCs per day; a construction permit is required. For the Atplus Destiny Tank, worst case potential emissions are less than 0.2 pounds per day and are exempt from permitting per **7 DE Admin. Code 1102 Section 2.2.2.**

7 DE Admin. Code 1114: *Visible Emissions* is applicable. No person shall cause or allow the emission of visible air contaminants and/or smoke from a stationary or mobile source, the shade or appearance of which is greater than twenty percent opacity for an aggregate of more than three minutes in any one hour or more than fifteen minutes in any twenty-four hour period. Compliance can be demonstrated by inspection and record review.

7 DE Admin. Code 1119: *Control of Odorous Air Contaminants* is applicable. Odors from this source shall not be detectable beyond the plant property line in sufficient quantities such as to cause a condition of air pollution. Compliance can be demonstrated by inspection.

7 DE Admin. Code 1120: *New Source Performance Standards* is not applicable. The equipment does not meet any of the categories in this regulation.

7 DE Admin. Code 1124: *Control of Volatile Organic Compound Emissions* is not applicable. The drumming tank is exempt from Section 1.2.1 (a control device is not required) because VOC emissions are not more than 15 lbs/day. The Blend Tank Area is not subject to Section 50 of this regulation as Croda has agreed to limit facility-wide emissions of VOCs to less than 25 tons per calendar year. Croda's facility-wide limit is 20 TPY VOC. There are no other sections of this regulation that apply specifically to the Blend Tank Area.

7 DE Admin. Code 1125: *Requirements for Preconstruction Review* is not applicable. Sections 2 and 3 of this regulation do not apply as the change does not trigger any significance levels. Section 4, *Minor New Source Review*, is not applicable because the individual sources do not emit 5 TPY VOC or greater.

7 DE Admin. Code 1130: *Title V State Operating Permit Program* is applicable. Croda, Inc. is a major source and operates under Title V **Permit: AQM-003/00058 (Renewal 3)**. This construction permit is being made federally enforceable and the terms and conditions of this permit will be added to the Title V Permit via the administrative amendment process after successful inspection.

7 DE Admin. Code 1138: *Emission Standards for Hazardous Air Pollutants for Source Categories* is not applicable. Croda, Inc. is not a major source of Hazardous Air Pollutants (HAPs).

RECOMMENDATIONS

I recommend that the attached Draft Permit be advertised on May 17, 2020 and sent to EPA and affected states pursuant to the requirements of **7 DE Admin. Code 1102 Section 12.4** on May 15, 2020. The public comment period ends on June 15, 2020. The EPA concurrent review ends on June 30, 2020.

ADM:JLF:MAS

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pc: Dover File
Melanie Smith



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

DIVISION OF AIR QUALITY
STATE STREET COMMONS
100 W. WATER STREET, SUITE 6A
DOVER, DELAWARE 19904

**ENGINEERING &
COMPLIANCE**

PHONE
(302) 739-9402

May 15, 2020

Croda, Inc.
315 Cherry Lane
New Castle, DE 19720

ATTENTION: Mr. Chris Barnett
Site Director

SUBJECT: **"Draft/Proposed" Permit: APC-2020/0070-CONSTRUCTION (FE)**

Dear Mr. Barnett:

Attached you will find a copy of **"Draft/Proposed" Permit: APC-2020/0070-CONSTRUCTION(FE)** for adding a Drumming Tank to existing Blend Tanks A and B. This permit is being made federally enforceable so its terms and conditions can be transferred to your facility's Title V Operating Permit (**AQM-003/00058 (Renewal 3)**) via the administrative permit amendment process. Please reference 7 **DE Admin. Code** 1102 Sections 11.2.10, 12.4 and 12.5 for the requirements of this process.

In order to make the terms and conditions of this **Permit: APC-2020/0070-CONSTRUCTION(FE)** federally enforceable, notice has been sent to EPA and affected states, and a Public Notice was advertised in the *Sunday News Journal* and *Delaware State News* on Sunday, May 17, 2020 to commence a thirty (30) day comment period. The public comment period will be no less than thirty (30) days in accordance with 7 **DE Admin Code** 1130. The public comment period ends June 15, 2020. Any comments should be brought to the Department's attention on or before June 15, 2020 and mailed to the following address:

State of Delaware - DNREC
Division of Air Quality
State Street Commons
100 W. Water Street, Suite 6A
Dover, DE 19904
ATTN: David Fees, Division Director

The Department requests that you mail the original and one (1) copy if you submit comments.

The "Draft/Proposed" permit is being submitted to EPA for concurrent processing. Please note that the EPA can comment during the 30 day public notice period and can approve or deny the permit during the entire 45 day EPA review period.

If the Department receives significant comments on the "Draft/Proposed" permit, comments will be evaluated, responses will be prepared, and the permit will be revised as necessary. The permit will then be submitted to you and the EPA as "Proposed" as a standard consecutive forty-five (45) day review period.

Croda, Inc.

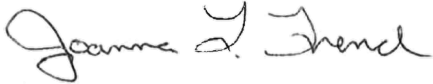
"Draft/Proposed" Permit: APC-2020/0070-CONSTRUCTION (FE)

May 15, 2020

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Any questions concerning the attached "Draft/Proposed" permit may be directed to Melanie Smith at (302) 739 9436.

Sincerely,

A handwritten signature in black ink that reads "Joanna L. French". The signature is written in a cursive style with a large initial 'J'.

Joanna L. French, P.E.
Engineer Program Manager
Engineering & Compliance Branch

ADM:JLF:MAS

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pc: Dover Title V File
 Angela Marconi
 Melanie Smith
 Gwendolyn Lawless, Croda, Inc., draft permit and letter

May 17, 2020

Draft/Proposed Permit: APC-2020/0070-CONSTRUCTION(FE)

Croda, Inc.
Blend Drumming Tank C, EU2, 28-5111

Croda, Inc.
315 Cherry Lane
New Castle, DE 19720

ATTENTION: Gwendolyn Lawless, P.E.
Lead SHE Advisor

Dear Ms. Lawless:

Pursuant to 7 **DE Admin. Code** 1102 Section 2 and Section 11, approval by the Department of Natural Resources and Environmental Control (the Department) is hereby granted for the construction of a 12,000 gallon drumming tank, pump, and appurtenances (Blend Drumming Tank C), to be used with existing Blend Tanks A and B, located at the Atlas Point Site facility in New Castle, Delaware, in accordance with the application submitted on Form Nos. AQM-1, AQM-2, AQM-3.1, AQM-3.5, AQM-5, AQM-1001, AQM-1001B, AQM-1001D, AQM-1001K, AQM-1001V, AQM-1001W, AQM-1001X, and AQM-1001Y dated January 16, 2020 signed by Chris Barnett, Site Director.

This permit is issued subject to the following conditions all of which are federally enforceable except Condition 6.1 and 2.5:

1. General Provisions

- 1.1 This permit expires on April 21, 2023. If the equipment covered by this permit will not be constructed by April 21, 2023, an application for renewal of this construction permit must be submitted by October 20, 2022. *[Reference 7 DE Admin. Code 1102 Section 11.10 dated 06/11/2006]*
- 1.2 The project shall be constructed in accordance with the information described above. If changes are necessary, revised plans must be submitted and a supplemental approval issued prior to actual construction. *[Reference 7 DE Admin. Code 1102 Section 11 dated 06/11/2006]*
- 1.3 Upon presentation of identification, the Company shall authorize officials of the Department to:

Draft/Proposed Permit: APC-2020/0070-CONSTRUCTION(FE)

Croda, Inc.— New Castle

Atlas Point Site

Blend Drumming Tank C

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- 1.3.1 Enter upon the Company's premises where a source is located or an emissions-related activity is conducted, or where records that must be kept under the terms and conditions of this permit are located. **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code** 1130 Section 6.3.2.1 dated 12/11/2000]
- 1.3.2 Have access to and copy, at reasonable times, any record(s) that must be kept under the terms and conditions of this permit. **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code** 1130 Section 6.3.2.2 dated 12/11/2000]
- 1.3.3 Inspect, at reasonable times, any record(s) that must be kept under the terms and conditions of this permit. **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code** 1130 Section 6.3.2.3 dated 12/11/2000]
- 1.3.4 Sample or monitor, at reasonable times, any substance or parameter for the purposes of assuring compliance with this permit or any applicable requirement. **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code** 1130 Section 6.3.2.4 dated 12/11/2000]
- 1.4 This permit may not be transferred to another location or to another piece of equipment or process. [Reference 7 **DE Admin. Code** 1102 Section 7.1 dated 06/01/1997]
- 1.5 This permit may not be transferred to another person, owner, or operator unless the transfer has been approved in advance by the Department. Approval (or disapproval) of the permit transfer will be provided by the Department in writing. A request for a permit transfer shall be received by the Department at least thirty (30) days before the date of the requested permit transfer. This request shall include: [Reference 7 **DE Admin. Code** 1102 Section 7.1 dated 06/01/1997 and 7 Del. C., Chapter 79]
 - 1.5.1 Signed letters from each person stating the permit transfer is agreeable to each person; and
 - 1.5.2 An Applicant Background Information Questionnaire pursuant to 7 Del. C., Chapter 79 if the person receiving the permit has not been issued any permits by the Department in the previous five (5) years.
- 1.6 The Company shall, upon completion of the construction, installation, or alteration of each emission unit, request in writing that the Department transfer the terms and conditions of this construction permit into the 7 **DE Admin. Code** 1130 operating permit. [Reference 7 **DE Admin. Code** 1102 Section 11.5 dated 06/11/2006]
- 1.7 The request shall contain the following information, and shall contain the following language from the responsible official: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." [Reference 7 **DE Admin. Code** 1102 Section 11.5.1 dated 06/11/2006]
 - 1.7.1 A description of the compliance status, a complete schedule, and a certification of compliance for the equipment, facility, or air contaminant control device with respect to all applicable requirements, in accordance with 7 **DE Admin. Code** 1130 Section 5.4.8 and 5.4.9; and

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- 1.7.2 A statement of the methods used to determine compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods.
- 1.8 Upon satisfactory demonstration that the equipment, facility, or air contaminant control device complies with all applicable requirements and all terms and conditions of the construction permit, and not prior to the expiration of the EPA review period provided for in 7 **DE Admin. Code** 1102, Section 12.5, the Department shall transfer the specified terms and conditions to the 7 **DE Admin. Code** 1130 permit via the administrative amendment process specified in 7 **DE Admin. Code** 1130. *[Reference 7 DE Admin. Code 1102 Section 11.5.2 dated 06/11/2006]*
- 1.9 The provisions of 7 **DE Admin. Code** 1102 Sections 2.1, 11.3, and 11.5 shall not apply to the operation of equipment or processes for the purpose of initially demonstrating satisfactory performance to the Department following construction, installation, modification, or alteration of the equipment or processes. The Company shall notify the Department sufficiently in advance of the demonstration and shall obtain the Department's prior concurrence of the operating factors, time period, and other pertinent details relating to the demonstration. *[Reference 7 DE Admin. Code 1102 Section 11.12 dated 06/11/2006]*
- 1.10 The owner or operator shall not initiate construction, install, or alter any equipment or facility or air contaminant control device which will emit or prevent the emission of an air contaminant prior to submitting an application to the Department pursuant to 7 **DE Admin. Code** 1102, and, when applicable, 7 **DE Admin. Code** 1125, and receiving approval of such application from the Department; except as exempted in 7 **DE Admin. Code** 1102 Section 2.2. *[Reference 7 DE Admin. Code 1102 Section 2.1 dated 06/11/2006]*

2. Emission Limitations

- 2.1 The emission of VOCs and HAPs from the blend tanks and blend drumming tank shall be controlled through the use of good operating practices. **(This condition was modified from and will be transferred to Permit: AQM-003/00058).** *[Reference 7 DE Admin. Code 1130 Section 6.1.1 dated 12/11/2000]*
- 2.2 The concentration of Volatile Organic Compound and Hazardous Air Pollutants from Emission Units 2, 3, and 4 shall not exceed levels at the facility fence line that the Department determines do not adversely affect public health, safety, and welfare. **(This condition was modified from and will be transferred to Permit: AQM-003/00058).** *[Reference 7 DE Admin. Code 1130, Section 6.1.1 dated 12/11/2000]*
- 2.3 No products shall be manufactured or processed in the Blend Tank Area unless the demonstrated VOC and HAP emission rates from processing those products meet the emission limitations of: **(This condition was modified from and will be transferred to Permit: AQM-003/00058).** *[Reference: APC-2004/0723-OPERATION (Amendment 5) dated 7/13/07]*
- 2.3.1 VOC/HAPs
- 2.3.1.1 58 pounds per batch, per tank, and 1.090 tons in any twelve (12) month rolling period, all tanks total. **(This condition was modified from and will be transferred to Permit: AQM-003/00058).** *[Reference: 7 DE Admin. Code 1130 Section 6.1.1 dated 12/11/2000]*

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- 2.3.1.2 Hourly emissions shall not exceed those used in Toxicological and Dispersion modeling for each product. **(This condition was taken from Permit: AQM-003/00058).** [Reference: APC-2004/0723-OPERATION (Amendment 5) dated 7/13/07 and 7 DE Admin. Code 1130, Section 6.1.1 dated 12/11/2000]
- 2.3.2 Total HAPs
- 2.3.2.1 9.2 pounds per batch, per tank, and 0.522 tons in any rolling twelve (12) month period, all tanks total. **(This condition was modified from and will be transferred to Permit: AQM-003/00058).** [Reference: 7 DE Admin. Code 1130 Section 6.1.1 dated 12/11/2000]
- 2.3.2.2 Hourly emissions shall not exceed those used in Toxicological and Dispersion modeling for each product. **(This condition was taken from Permit: AQM-003/00058).** [Reference: APC-2004/0723-OPERATION (Amendment 5) dated 7/13/07 and 7 DE Admin. Code 1130, Section 6.1.1 dated 12/11/2000]
- 2.3.3 Dioxane
- 2.3.3.1 3.5 pounds per batch, per tank, and 0.505 tons in any rolling twelve (12) month period, all tanks total. **(This condition was modified from and will be transferred to Permit: AQM-003/00058).** [Reference: 7 DE Admin. Code 1130 Section 6.1.1 dated 12/11/2000]
- 2.4 No person shall cause or allow the emission of visible air contaminants and/or smoke from a stationary or mobile source, the shade or appearance of which is greater than twenty percent (20%) opacity for an aggregate of more than three (3) minutes in any one (1) hour or more than fifteen (15) minutes in any twenty-four (24) hour period. **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 DE Admin. Code 1114 Section 2.0 dated 11/11/2013]
- 2.5 Odors from this source shall not be detectable beyond the plant property line in sufficient quantities such as to cause a condition of air pollution. **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 DE Admin. Code 1119 Section 2.0 dated 02/01/1981]

3. Operational Limitations

- 3.1 Proper operation of Blend Area equipment shall include installation and maintenance of temperature gauges on blend tanks A & B and drumming tank C. **(This condition was modified from and will be transferred to Permit: AQM-003/00058).** [Reference 7 DE Admin. Code 1130 Section 6.1.3 dated 12/11/2000]
- 3.2 At all times, including periods of startup, shutdown, and malfunction, the owner or operator shall, to the extent practicable, maintain and operate the facility, including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determinations of whether acceptable operating procedures are being used will be based on information available to the Department, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. **(This condition will be transferred to Permit: AQM-003/00058)** [Reference 7 DE Admin. Code 1101 Section 3 11/01/2013 and 7 DE Admin. Code 1102 Section 11.6 dated 06/11/2006]

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Croda, Inc.— New Castle

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- 3.3 All structural and mechanical components of the equipment covered by this permit and in use shall be maintained in proper operating condition. **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code** 1101 Section 3 dated 11/01/2013 and 7 **DE Admin. Code** 1102 Section 11.6 dated 06/11/2006]

4. Testing and Monitoring Requirements

- 4.1 The Department reserves the right to require that the owner or operator perform emission tests using methods approved in advance by the Department
- 4.2 The Company shall perform a Toxicological and Dispersion analysis for each product family manufactured or processed in the Blend Tank Area. **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code** 1130 Section 6.1.3 dated 12/11/2000]
- 4.3 The Company shall perform an emissions demonstration for each product family manufactured or processed in the Blend Tank Area. **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code** 1130 Section 6.1.1 dated 12/11/2000]
- 4.4 Temperature in blend tanks A & B and drumming tank C shall be monitored continually during operation. **(This condition was modified from and will be transferred to Permit: AQM-003/00058)** [Reference: APC-2004/0723-OPERATION (Amendment 5) dated 7/13/07 and 7 **DE Admin. Code** 1130 Section 6.1.3 dated 12/11/2000]
- 4.5 No later than the fifteenth day of each month, the Company shall calculate the VOC and HAP emissions from each batch produced in the Blend Tank Area for the previous month. **(This condition was modified from and will be transferred to Permit: AQM-003/00058)** [Reference APC-2004/0723-OPERATION (Amendment 5) dated 7/13/07 and 7 **DE Admin. Code** 1130 Section 6.1.3 dated 12/11/2000]
- 4.5.1 VOC and HAP Emissions shall be calculated using engineering calculations and data from production logs. **(This condition was modified from and will be transferred to Permit: AQM-003/00058)** [Reference: 7 **DE Admin. Code** 1130 Section 6.1.1 dated 12/11/2000]

5. Record Keeping Requirements

- 5.1 The Company shall maintain, at a minimum, all of the information required by this permit for a minimum of five (5) years from such information's date of record. **(This condition was modified from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code** 1130 Section 6.1.3.2.2 dated 12/11/00]
- 5.2 Records of all test data shall be maintained. This data includes, but may not be limited to:
- 5.2.1 The date, place and time of sampling measurements;
- 5.2.2 The date(s) analyses were performed;
- 5.2.3 The Company or entity that performed the analyses;
- 5.2.4 The analytical techniques or methods used;
- 5.2.5 The results of such analyses; and

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- 5.2.6 The operating conditions existing at the time of sampling or measurement. *[Reference 7 DE Admin. Code 1130 Section 6.1.3.2 dated 12/11/00]*
- 5.3 The Toxicological and Dispersion Analysis for each product or product family manufactured or processed in the Blend Tank Area demonstrating compliance with the Emission Standard of Conditions 2.2 and 2.3. A summary of the Toxicological and Dispersion analysis from each product family shall be retained and available for review by the Department. **(This condition was taken from Permit: AQM-003/00058)** *[Reference 7 DE Admin. Code 1130 Section 6.1.1 dated 12/11/2000]*
- 5.4 Engineering calculations for each product or product family manufactured or processed in the Blend Tank Area demonstrating compliance with the emission limitations of Condition 2.3. **(This condition was modified from and will be transferred to Permit: AQM-003/00058)** *[Reference: APC-2004/0723-OPERATION (Amendment 5) dated 7/13/07 and 7 DE Admin. Code 1130 Section 6.1.1 dated 12/11/2000]*
- 5.5 The temperature in blend tanks A & B and drumming tank C during operation shall be recorded on a strip recorder or other data logging device. **(This condition was modified from and will be transferred to Permit: AQM-003/00058)** *[Reference: APC-2004/0723-OPERATION (Amendment 5) dated 7/13/07 and 7 DE Admin. Code 1130 Section 6.1.3 dated 12/11/2000]*
- 5.6 The calculated VOC and HAP emissions from each batch manufactured or processed in the Blend Tank Area. **(This condition was modified from and will be transferred to Permit: AQM-003/00058)** *[Reference: APC-2004/0723-OPERATION (Amendment 5) dated 7/13/07 and 7 DE Admin. Code 1130 Section 6.1.1 dated 12/11/2000]*
- 5.7 Each month, the owner or operator shall calculate and document the monthly and rolling 12 month total emissions from Blend Tank A, Blend Tank B, and Drumming Tank C (combined) for the following pollutants: *[Reference: 7 DE Admin. Code 1130 Section 6.1.1 dated 12/11/2000]*
- 5.7.1 VOC/HAPs;
- 5.7.2 Total HAPs;
- 5.7.3 Dioxane.

6. Reporting Requirements

- 6.1 Emission in excess of any permit condition or emissions which create a condition of air pollution shall be reported to the Department:
- 6.1.1 Immediately upon discovery and after activating the appropriate site emergency plan to the Department's 24-hour complaint line (1-800-662-8802) any deviation that poses an imminent and substantial danger to public health, safety, or the environment. **(This condition was taken from Permit: AQM-003/00058)** *[Reference 7 DE Admin. Code 1130 Section 6.1.3.3.2 dated 12/11/00]*
- 6.1.2 Immediately upon discovery by calling the Environmental Emergency Notification and Complaint number, (800) 662-8802. (State Enforceable Only) **(This condition was taken from Permit: AQM-003/00058)** *[Reference 7 DE Admin. Code 1130 Section 6.1.3.3.3 dated 12/11/00]*

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- 6.2 Discharges to the atmosphere in excess of any quantity specified 7 **DE Admin. Code** 1203 "**Reporting of a Discharge of a Pollutant or an Air Contaminant**" shall be reported, immediately upon discovery and after activating the appropriate site emergency plan, either in person or to the Department's 24-hour complaint line (1-800-662-8802). Discharges in compliance with this permit and excess emissions previously reported under Condition 6.1 of this permit are exempt from this reporting requirement. **(This condition was modified from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code** 1130 Section 6.1.3.3.3.5 dated 12/11/00 and 7 Del. C. Chapter 60, Section 6028]
- 6.3 In addition to complying with Condition 6.1 and 6.2 of this permit, any reporting required by 7 **DE Admin. Code** 1203 "**Reporting of a Discharge of a Pollutant or an Air Contaminant**" and any other reporting requirements mandated by the State of Delaware, the owner or operator shall for each occurrence of excess emissions, within thirty (30) calendar days of becoming aware of such occurrence, supply the Department in writing with the following information:
- 6.3.1 The name and location of the facility;
- 6.3.2 The subject source(s) that caused the excess emissions;
- 6.3.3 The time and date of first observation of the excess emissions;
- 6.3.4 The cause and expected duration of the excess emissions;
- 6.3.5 For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
- 6.3.6 The proposed corrective actions and schedule to correct the conditions causing the excess emissions. **(This condition was modified from and will be transferred to Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code** 1112 Section 7.3 paragraphs 1, 2, 3, 4, and 5 dated 11/24/1993]
- 6.3 Each document submitted to the Department/EPA pursuant to this permit shall be certified by a Responsible Official as to truth, accuracy, and completeness. Such certification shall be signed by a Responsible Official and shall contain the language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code** 1130 Section 5.6 dated 11/15/93 and 6.3.1 dated 12/11/2000]
- 6.4 Each document submitted to the Department/EPA pursuant to this permit shall be sent to the following addresses: **(This condition was taken from Permit: AQM-003/00058)**

Draft/Proposed Permit: APC-2020/0070-CONSTRUCTION(FE)

Croda, Inc.– New Castle

Atlas Point Site

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May 17, 2020

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State of Delaware – DNREC Division of Air Quality State Street Commons 100 W. Water Street, Suite 6A Dover, DE 19904 ATTN: Division Director	United States Environmental Protection Agency Enforcement and Compliance Assurance Division Air Section (3ED21) 1650 Arch Street Philadelphia, PA 19103-2029 ATTN: Section Chief
No. of Originals: <u>1</u>	No. of Copies: <u>1</u>

7. Compliance Certification

- 7.1 Compliance with the terms and conditions of this permit shall be certified to the Department not later than the first day of February of each year unless the terms and conditions require Compliance Certifications to be submitted more frequently. Such certifications shall cover the previous calendar year and shall be submitted on Form AQM-1001BB. The Compliance Certification shall include the following information: **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code 1130 Section 6.3.5.3.1** dated 12/11/2000]
- 7.1.1 The identification of each term or condition of the permit that is the basis of the certification. **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code 1130 Section 6.3.5.3.1** dated 12/11/2000]
- 7.1.2 The Company's current compliance status, as shown by monitoring data and other information reasonably available to the Company. **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code 1130 Section 6.3.5.3.2** dated 12/11/2000]
- 7.1.3 Such certification shall indicate whether compliance was continuous or intermittent during the covered period. **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code 1130 Section 6.3.5.3.3** dated 12/11/2000]
- 7.1.4 The method(s) used for determining the compliance status of the Company, currently and over the reporting period as required by the monitoring, record keeping, and reporting required under Conditions 4, 5, and 6. **(This condition was modified from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code 1130 Section 6.3.5.3.4** dated 12/11/2000]
- 7.1.5 Such other facts that the Department may require to determine the compliance status of the source. **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code 1130 Section 6.3.5.3.5** dated 12/11/2000]
- 7.2 Each compliance certification shall be submitted to the Department and EPA and shall be certified in accordance with Condition 6.3 of this permit. **(This condition was modified from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code 1130 Section 6.3.5.4** dated 12/11/2000]
- 7.3 Any additional information possessed by the Company that demonstrates noncompliance with any applicable requirement must also be used as the basis for Compliance Certifications. **(This condition was taken from Permit: AQM-003/00058)** [Reference 62 FR 8314 dated 2/24/97]

Draft/Proposed Permit: APC-2020/0070-CONSTRUCTION(FE)

Croda, Inc.— New Castle

Atlas Point Site

Blend Drumming Tank C

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- 7.4 The Company shall submit a semi-annual certification of compliance with Emission Standard Conditions 2.2 and 2.3. **(This condition was modified from and will be transferred to Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code 1130 Sections 6.1.3.2.3 and 6.3.1 dated 12/11/00**]

8. Administrative Conditions

- 8.1 The Company shall have available at the facility at all times a copy of this permit and shall provide a copy of this permit to the Department upon request. **(This condition was taken from Permit: AQM-003/00058)** [Reference 7 **DE Admin. Code 1102 Section 8.1 dated 06/11/2006**]
- 8.2 Failure to comply with the provisions of this permit may be grounds for suspension or revocation. [Reference 7 **DE Admin. Code 1102 Section 6 dated 06/11/2006**]

Sincerely,

Angela D. Marconi, P.E., BCEE
Program Manager
Engineering & Compliance Branch

ADM:JLF:MAS
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pc: Dover (Title V) File
Melanie Smith