



CMRRR No. 7015 0640 0006 5462 6864

December 2, 2016

Mr. Ali Mirzakhali
Division Director – Division of Air Quality
Delaware Department of Natural Resources and Environmental Control
State Street Commons
100 W. Water Street, Suite 6A
Dover, DE 19904

Re: Delaware City Refining Company, LLC.
DCRC Ethanol Marketing Project Permit Application

Dear Mr. Mirzakhali:

Delaware City Refining Company, LLC (DCRC) submitted an air Permit Application on August 18, 2016 for the Ethanol Marketing project. In this application, we included the use of existing Tank 206 and existing Tank 225 in support of the proposed project activities. The emissions information provided in the application is accurate; however, we also included emissions for a scenario where an alternate tank is used as opposed to Tank 225. When we ran the air emissions calculations using the EPA software TANKS 4.09 for this alternate tank, due to tank geometry differences, the potential VOC air emissions were higher than they were for Tank 225 for the same throughput of denatured ethanol. At the time of the permit application submittal, we sought to incorporate the flexibility in the permit application in case the alternate tank was chosen for this project; therefore, we included the higher air emissions scenario in the permit application. The higher air emissions scenario for the alternate tank stated potential VOC emissions of 0.8 tons per year as compared to the Tank 225 potential VOC emissions of 0.5 tons per year. DCRC has since decided that Tank 225 will be the tank used to support this project and there is no longer the need to include the emissions associated with an alternate tank. We therefore request the potential VOC air emissions associated with this project be based on the Tank 225 VOC emissions of 0.5 tons per year.

If you have any questions or comments regarding this submittal, please do not hesitate to contact me at 302-836-6750.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Boyd", is written over a large, light-colored circular stamp or watermark.

Larry Boyd
Environmental Engineer



cc:

CMRRR No. 7015 0640 0006 5462 6871

Mr. Paul Foster
DNREC
715 Grantham Lane
New Castle, Delaware 19720