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Appendices to the Civic League for New Castle County's filed comments

The Civic League's previous comments ended with; These are NOT Industrial Process Engineering regulations and jeopardize the safety of the citizens Delaware. We need stringent, responsible, professionally developed engineering regulations.

Today, I participated in a meeting with the Plant Manager and members of his team at the Croda Facility. Most of the conversation was focused on Community interaction, involvement and notification. Nonetheless, some of the discussion involved technical design and systems. In that portion of the discussion it was noted that Croda purchased the Ethylene Oxide process design and with few exceptions utilized what was provided by their process design consultant.

Though many processes like Ethylene Oxide are "old (longstanding) chemistry, our ability to control, optimize and protect the process and the surrounding community, has dramatically changed. It appears that DNREC's ability to recognize that, is limited at best. I know this personally, having ended the last nine years of my career at Dupont in an Engineering group named Measurement System Technology. Our group's business was to sell existing process and facility management on the benefit of utilizing state-of-the-art technology both for process efficiency and safety control. Considering how Croda approached their needs and DNREC's lack of understanding to the level necessary to call for stringent process control and design, we all had more than 2700 pounds of highly explosive and highly carcinogenic Ethylene Oxide released into our air.

Similarly, 15 or 20 years ago, both, the Environmental Appeals Board and the Coastal Zone Industrial Control Board had several members with extensive Technical and Chemistry backgrounds that were independent of direct business influence. Their evaluations were based on science and a broader understanding of technology. It appears that that level of understanding is somewhat lacking today.

The Civic League is a 57-year-old organization that has always been focused on appropriate and responsible growth. In this case, appropriate and responsible redevelopment of these industrial sites demands Technical Regulations that specifically defines control loops, interlock systems and process instrumentation to protect our communities and our coastline.

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