

BECAUSE OF THE HOLIDAY WEEK I REQUEST THE RECORD REMAIN  
OPEN TILL JULY 12<sup>TH</sup>.

DUNN Exh. #1

I'm Bill Dunn, representing the Civic League for New Castle County, and along with others, went through the interview process with CBI, attended two of the three of the Public Workshops and stated my interest of being on the RAC.

I am a retired Staff Technologist at Dupont. During my tenure, I did hundreds of lab-scale chemical reactions and polymerizations, was the instrument point person for a Quality Control lab in a new polymer plant for 18 months in Charleston, SC and did instrument support and installations at a half dozen facilities as well as visited 13 different production sites in the U.S., Canada and Europe. Despite my operational experience and background, and the Civic League's long recognized "standing" representing communities across New Castle County, I was not offered a position on the RAC. The one person that had a more prominent and recognizable background in both chemistry and civic participation was Eugene McCoy. Tragically, Dr. McCoy passed away days after the first RAC meeting. And the Secretary, rather than replacing Dr. McCoy with another person with similar experience and background, chose a person with NO technical background and only limited community involvement.

In the end, though I was verbally offered an opportunity to participate at the "sub-group" level, I was fully aware that the decision-making was going to occur at the RAC level and decided to focus my time attending those meetings, in which I attended 11 of.

In this report, regarding Environmental Impacts they state: ***The CZA provides a detailed list of environmental impacts that must be addressed by applicants for a Coastal Zone Permit or a Conversion Permit.***

If you Google that sentence, it will lead you to a DNREC page that has, at the top, ***Regulatory Flexibility Act Form.*** On the first page of that form it says

What is a Regulatory Flexibility Analysis (RFA)?

In each RFA, an agency must consider, where applicable, lawful, feasible and desirable, specific methods of reducing the burdens of the regulation on individuals and/or small businesses, including: (1) establishing less stringent requirements and deadlines; (2) establishing performance standards to replace design standards; (3) exempting individuals and small businesses from all or part of the regulation; and (4) examining other ways to accomplish the regulation's purpose, while minimizing the impact upon individuals and/or small businesses.

You are approving the reuse or expanded use, of just under 4000 acres of Delaware Coastline. These are NOT industrial Process Engineering regulations and jeopardize the safety of the citizens Delaware. We need stringent, responsible, professionally-developed engineering regulations.