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**Subject:** Public Hearing Comments  
**Date:** Tuesday, July 21, 2020 5:33:14 PM

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## Comments on Docket #2020-P-A-0018

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Organization:

### Comments:

I am opposed to any expansion of Croda's operations at this point in time. While the proposed project appears to be relatively insignificant there are still several health and safety concerns to be addressed. Despite the relatively small quantities of additional emissions highlighted in the application, they still represent another increment of hazardous pollution exposure for nearby residents. Viewed in isolation these levels of increased emissions seems benign, but the additive effect of this to what's already being emitted must be assessed on a cumulative basis. DNREC should require a Health Impact Analysis (as described by the Delaware Dept. of Health) prior to any further review of this application. Croda should be allowed to expand in any form until:

- Croda have demonstrated they can be a safe operator of a high hazard facility. The EtO production unit has only been in operation for a few months, and given Croda's history of performance and compliance in operating their previously less hazardous facility it is premature to consider any expansion at this point.
- They become good neighbors and are proactively working to protect residents and to become more transparent. To date both Croda and DNREC have refused to support community based air monitoring and Croda have only reluctantly made incremental improvements to their community emergency alert system. These are both items requested by the surrounding community via a still open appeal of the settlement agreement between Croda and DNREC.
- Croda have an active/ transparent plan to reduce ETO emissions and move off the EPA's top 25 ETO polluters list. Based on the EPA's 2018 NATA data, New Castle County has the second highest cancer risk from EtO pollution in the country. This assessment was based on 2014 monitoring data when Corda was only a consumer of EtO, and one would have to assume their EtO emissions have only increased since they started producing EtO. This is an excellent opportunity for DNREC to step up and focus on protecting the health and safety of Delaware's residents rather than continuing to enable the proliferation of environmental racism in Delaware. Thank You, Willie V. Scott