

Willie V. Scott
1800 N Bancroft Pkwy.
Wilmington, DE. 19806
(302) 559-3492
wscott8205@aol.com

Lisa A. Vest
DNREC Office of the Secretary
89 Kings Highway
Dover, DE 19901

Supplemental Comment and Correction - Docket #2020-P-A-0018 Croda Air Quality Construction Permit

This letter is to correct my previous comment submitted via form on 7/21/20, and to add comments subsequent to the 7/21/20 Public Hearing.

Supplemental Comment:

I was extremely disappointed after participating in the 7/21/20 Public Hearing on this issue as there was no allowance for oral comments from the public. Such a process does not serve DNREC's stated mission and purpose nor the public interest, and it is a best a questionable if the process meets Delaware law or the letter of Governor's Emergency Declaration. I support and join with the written comments submitted by Kenneth Kristl on 7/23/20 challenging the legality of such a process.

Corrected Original Comment (submitted 7/21/20):

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 additional increments 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 not 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, the area surrounding the Croda facility has the second highest cancer risk rating from EtO pollution in the country. This assessment was based on 2014 monitoring data when Croda 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