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ENVIRONMENTAL APPEALS BOARD

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VETERANS SERVICES; AND CLEAN &  
FRESH ENVIRONMENTAL SERVICES,  
INC.,

Plaintiff,

v.

DNREC,

Defendant.

Case No.

EAB 2024-02

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HEARING

DATE: Tuesday, July 16, 2024

TIME: 9:10 a.m.

BEFORE: Delaware Environmental Appeals Board

LOCATION: Kent County Administration Building

555 South Bay Road

Dover, DE 19901

REPORTED BY: Samuel Haut

JOB NO.: 6688098

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A P P E A R A N C E S

ON BEHALF OF PLAINTIFF VETERANS SERVICES:

JOSEPH M. WALLS, ESQUIRE  
Veterans Services  
26 West South Street  
Smyrna, DE 19977  
joewalls@veterans.services  
(302) 653-3940

ON BEHALF OF DEFENDANT DNREC:

VALERIE EDGE, ESQUIRE  
DNREC  
102 West Water Street  
Dover, DE 19904  
valerie.edge@delaware.gov  
(302) 739-9943

ALSO PRESENT:

Zach Naylor, Board Attorney  
Deborah Wicks, Board Member  
Randall Horne, Board Member  
Michael Horsey, Board Member  
Michael Houghton, Board Member  
Guy Marcozzi, Board Member (by videoconference)

A P P E A R A N C E S (Cont'd)

ALSO PRESENT:

Robert Mulrooney, Board Member (by  
videoconference)

Janella Sapp, Administrative Specialist

Courtney Austin, Digital Reporter

George X, CEO Clean & Fresh Environmental  
Services, Inc.

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NO.

DESCRIPTION

ID/EVD

(None marked.)

P R O C E E D I N G S

1  
2 MR. HOLDEN: My name is Dean Holden,  
3 chairperson of the Delaware Environmental Appeals  
4 Board.

5 Before we begin, for those of you  
6 attending in person, please silence your electronic  
7 devices. For those joining us on the phone or online,  
8 please mute your microphone unless you're addressed by  
9 the board.

10 An appeal was filed by Veterans  
11 Services and Clean and Fresh Environmental Services  
12 that challenged the March 12, 2024, order, 2024-A-  
13 0010, of DNREC's secretary to approve a permit for  
14 natural minor development by Noramco, Incorporated.

15 The purpose of today's hearing is for  
16 the Delaware Environmental Appeals Board to consider  
17 DNREC's motion to dismiss appeal 2024-02. Appellee  
18 DNREC has moved to dismiss the appeal as being  
19 untimely filed for Appellant's failure to appear  
20 represented by counsel and for Appellant's lack of  
21 standing.

22 Notice of today's hearing at the Kent  
23 County Administrative Building, 55 Bay Road, Dover,  
24 Delaware, and by virtual access was posted on the City

1 of Delaware Secretary of State's public meeting  
2 calendar and on the board website. In addition,  
3 public notice of this hearing was published in the  
4 News Journal and the Delaware State News.

5 The Delaware Environmental Appeals  
6 Board is a quasi-judicial body created by the General  
7 Assembly to hear appeals of decisions of the secretary  
8 of DNREC. The way the board fulfills its duties and  
9 responsibilities, including conducting hearings, is  
10 established to govern by Delaware code board  
11 regulations case law.

12 I'll now introduce the board members  
13 and board staff. To my far left, Michael Horsey;  
14 Deborah Wicks; as I said, my name is Dean Holden. To  
15 my right is Attorney General Zach Naylor.  
16 Administrative Assistant Janella Sapp is with us  
17 today. The appellants represented by counsel at  
18 today's hearings. I ask the counsel to take this  
19 opportunity to introduce themselves to the board.

20 MS. EDGE: May it please the board, my  
21 name is Valerie Edge. I'm with the Delaware  
22 Department of Justice, and I represent the appellee,  
23 the Delaware Department of Natural Resources and  
24 Environmental Control.

1 MR. HOLDEN: Ms. Edge, who do you have  
2 with you today?

3 MS. EDGE: This is my assistant, Rory.

4 MR. HOLDEN: Thank you.

5 Appellants who are not represented by  
6 counsel, the individuals representing Veterans  
7 Services and Clean and Fresh Environmental Services  
8 can identify themselves.

9 MR. WALLS: My name is Joseph Walls. I  
10 represent myself.

11 MR. X: My name is George X. I'm the  
12 president of Clean and Fresh Environmental Services --

13 THE REPORTER: I can't -- I can't  
14 hear -- I can't hear you. Could you please speak  
15 can you please speak up as much as possible? It's  
16 just really -- it's very garbled, everything you're  
17 saying.

18 MR. X: My name is George X. I'm here  
19 as a pro se litigant. I am the president of Clean and  
20 Fresh Environmental Services. I'm here representing  
21 myself as the pro se litigant.

22 MR. HOLDEN: Mr. Walls, Mr. X, I wonder  
23 if you might move down to the end here. That way you  
24 get closer to the microphone. My apologies.

1           We may be able to pull one table to the  
2 center and pull it out --

3           MS. EDGE: Yeah. Yeah. We can do  
4 that.

5           THE REPORTER: If there's any way to  
6 get, like, the camera closer to -- or the microphone  
7 closer to everybody or -- I'm not sure if it's, like,  
8 a connection issue. I feel like you guys probably  
9 have good internet, but I -- it's just, like -- all of  
10 what -- like, I'm having a really hard time  
11 understanding the specific words, and it's just --  
12 I -- you know -- I'll -- I'll let you know if I -- I  
13 can't hear anything at all. I just, you know, want to  
14 give you a heads up that it's -- the sound is garbled.

15           MR. HOLDEN: All right. Thank you,  
16 folks, for readjusting.

17           Keep us posted if you can hear us or  
18 have any challenges.

19           Thank you for the introductions. So  
20 today, only appellant Veteran Services responded to  
21 the motion to dismiss. So only it will have the  
22 opportunity to make argument in opposition of the  
23 motion to dismiss today. DNREC will have up to 30  
24 minutes to argue in favor of its motion to dismiss and



1 may reserve any portion of that allotted time for  
2 rebuttal. That will be followed by 30 minutes for a  
3 representative of Veterans Services to argue against  
4 the motion to dismiss. Board members may ask  
5 questions during the argument or after the allotted  
6 time or could react to the arguments at the  
7 conclusion.

8 Counsel for DNREC --

9 MR. X: Can I ask a question before we  
10 get started?

11 MR. HOLDEN: Mr. X?

12 MR. X: Yes. When this appeal was  
13 initially filed, even back before they actually filed,  
14 they filed it as a joint appeal on behalf of myself  
15 and on behalf of Veterans Services. So -- I think I  
16 spoke to an Amy Mann. She gave me some instructions  
17 on the procedures to file an appeal. We had a hearing  
18 notwithstanding. That was a hearing off the record.  
19 A recommendation for replacing at some point on the  
20 record, that will be a challenge. The recommendation  
21 that I'd be dismissed because I'm not represented by  
22 legal counsel. The appeal or the opposition presented  
23 by Veterans Services, although we're pro se litigant,  
24 it was an appeal on -- it was a challenge on both of

1 our behalf. So I don't want that to go off the record  
2 that my challenge to -- to the motion to dismiss was  
3 not entered. Veterans Services filed it. That was  
4 from our office's perspective, mine in particular,  
5 that that was on both of our behalf as we initially  
6 started it jointly. I want that to be in the record.  
7 That's the case I think if I have to challenge it  
8 later.

9 MR. HOLDEN: Thank you, Mr. X.

10 Ms. Edge?

11 MS. EDGE: Is it fair to assume that  
12 the board has read the Veterans submissions, or should  
13 we -- through the whole thing?

14 MR. HOLDEN: I would say approach it as  
15 you would like. The board typically reads all the  
16 submissions.

17 MS. EDGE: Yes. Thank you.

18 As I said, Valerie Edge on behalf of  
19 the Department of Natural Resources. The issues are  
20 fairly simple in this case. Veterans Services and  
21 Clean and Fresh Environmental Services, Inc. submitted  
22 an appeal that was received in the offices of DNREC  
23 and hand-delivered on April 5, 2024. The secretary --  
24 was promulgated to the community on March 13, 2024,

1 and that is a quote from Appellant's appeal, that is  
2 the joint appeal letter submitted by both Clean and  
3 Fresh Environmental Services, Inc. and Veterans  
4 Services.

5 The statutory deadline for submitting  
6 an appeal, which is jurisdictional, which means the  
7 board doesn't have jurisdiction to hear hearing of the  
8 appeal after 20 days from application of the decision.  
9 On its terms, on its face, Veterans Services and Clean  
10 and Fresh Environmental Services have admitted that it  
11 was promulgated to the community on the day it was  
12 emailed to them. It was emailed to both of them.  
13 They were referred to the DNREC website, which is the  
14 only place it's published. DNREC does not publish  
15 notices of decision and neither of the appellants for  
16 Noramco the facility nor the person who requested  
17 the -- who generally get individual notice that  
18 they -- because they commented that they'd get  
19 individual email notice. So it's clear that the  
20 appeal was filed beyond the jurisdiction.

21 Now there was some suggestion that an  
22 email appeal had been filed and that that might have  
23 been timely; but looking at the metadata from the  
24 appeal, it shows that it was created in a time that

1 was untimely, and in Veterans Services response, they  
2 have pivoted away from arguing that the email appeal  
3 was not received, and there is an email from the board  
4 that says in there that it was not received. That's  
5 pivoted away from that and instead is arguing that  
6 when the -- sent out a portfolio of documents after  
7 receiving the appeal, and they sent it certified mail,  
8 that that should be the date that the appeal was  
9 recognized. That doesn't make sense. It's not good  
10 public policy. The appellants have pointed out in  
11 their appeal what date it is that it should --.

12 Pivoting to the issue of  
13 representation, George X is the president of Clean and  
14 Fresh Environmental Services, Inc. That's a  
15 corporation. As the board knows, a corporation needs  
16 to be represented by counsel in an administrative  
17 proceeding. There is no counsel present, and DNREC  
18 moves to dismiss the Clean and Fresh Environmental  
19 Services appeal because they have failed to appear by  
20 counsel and they have failed to respond in any way to  
21 DNREC's motion to dismiss.

22 With respect to counsel for Veterans  
23 Services, in its appeal, Veterans Services --  
24 association, and DNREC moved to dismiss it because an

1 association would also need to be represented by  
2 counsel. In response, Mr. Walls indicated that he was  
3 a sole proprietor; and to the extent that Mr. Walls is  
4 the sole proprietor of Veterans Services and he is  
5 representing only Veterans Services, DNREC concedes  
6 that he has the ability to represent business before  
7 the board here today.

8 In its standing, DNREC presents that  
9 Veterans Services has not demonstrated that it has  
10 standing to do the appeal. Veterans Services is  
11 located in Smyrna, Delaware. It's DNREC's belief that  
12 the housing that it provides, which is its mission, is  
13 provided in Smyrna, Delaware. That's at least 30,  
14 40 -- I think at least 30 miles away from Noramco.

15 All of the information that Mr. Walls  
16 has provided to claim that he has standing has to do  
17 with his relatives living within the community, with  
18 his canvassing within the community, with his being on  
19 the board of a school in the community; and to the  
20 extent that that is true, all those are personal.  
21 DNREC strongly believes that it's unlikely that the  
22 service is on the board. It is much more likely that  
23 Mr. Walls personally and while that may seem to be  
24 stringent about the difference to the layperson, in

1 terms of this, it was clearly stated that Veterans  
2 Services is the appellant; and so those personal  
3 things should not count as standing.

4           Lastly, DNREC believes there's no  
5 redressability here. In order to have standing, what  
6 you ask for has to be what you want. Mr. Walls and  
7 Veterans Services indicates that they're concerned  
8 about the current level of pollution. The permit was  
9 granted to Noramco to give them additional -- the  
10 option to produce additional medicine. They produce  
11 medicine --. They only have so many vessels. They  
12 can only do so many things at a time. They're  
13 overarching missions and BOCs from other compounds.  
14 They're generally unserved. Their limits are not  
15 increased in this permit.

16           So to grant the permit would give away  
17 Noramco's --. They're still going to have the same  
18 level of pollution that he's already been concerned  
19 about, so he doesn't get anything out of the permits.

20           Does the board have any questions? I  
21 can reserve the remainder of my time.

22           MR. HOLDEN: -- virtual connectivity  
23 interruption --

24           THE REPORTER: What -- I -- what did

1 you say? I -- the -- I can't -- is it possible to  
2 move, like, the microphone for the virtual -- for the  
3 computer or whatever is recording your guys' audio to  
4 me? Is it possible to, like, get it next to someone  
5 or something? Because I -- it's like -- you guys are,  
6 like, talking, like, underwater, and it's just very,  
7 very difficult to understand what people are saying.  
8 I apologize. You know, I --

9 MR. WALLS: We don't need this guy  
10 disturbing the flow. Is he one of your guys or is  
11 he --

12 THE REPORTER: I'm trying to get the  
13 transcript for this proceeding.

14 MR. HOLDEN: His ability here as the  
15 court reporter required to keep record of the hearing  
16 as a whole. So we have a duty --

17 MR. WALLS: We need to keep his  
18 interruptions to a minimum. We need to do the best we  
19 can to --

20 THE REPORTER: I want to keep it to a  
21 minimum, but I have to be able to hear you guys to  
22 make a transcript for this proceeding, and I can't do  
23 that if I can't hear you. So I apologize for  
24 interrupting, but I need -- I can't make a transcript

1 if I can't hear what people are saying. So I just --  
2 I apologize, but --

3 MR. HOLDEN: So Mr. Haut, what was the  
4 last piece that you had trouble hearing and we  
5 could --

6 THE REPORTER: I heard most of what  
7 Valerie was saying, but whatever you said in response  
8 after that, I didn't catch.

9 MR. HOLDEN: Okay. So what I stated  
10 was are there any questions from the board for Ms.  
11 Edge.

12 THE REPORTER: Okay.

13 MR. HOLDEN: In the room, we had none.  
14 Mr. Marcozzi or Mr. Horne, if you have any questions,  
15 you can unmute yourself here.

16 MR. MARCOZZI: No questions.

17 MR. X: I'd like to interject at this  
18 time. It doesn't prove anything at all of what would  
19 I have said on record.

20 MR. HOLDEN: Mr. X, every comment you  
21 make is in the record. It's being transcribed by the  
22 court reporter.

23 MR. X: Okay. I appreciate that. I  
24 really don't believe in any harm. This has just been



1 a tumultuous journey for us, learning the court  
2 procedures, and follow all instructions. So he's  
3 going through what we've been going through since day  
4 one so I'd like the board to recognize that.

5 MR. HOLDEN: So we've no questions from  
6 the board.

7 Mr. Walls?

8 MR. WALLS: My name is Joseph Walls. I  
9 am pro se litigated. I am the owner of Veterans  
10 Services, which is a sole proprietorship. In Ms.  
11 Edge's reply, she recognizes that I have standing as a  
12 personal individual. Legally, there's a concept  
13 called legal fiction when you deal with a corporation,  
14 when you deal with nonprofits. These are all  
15 companies that are created in a way that protects the  
16 owners of those companies from many forms of  
17 liabilities so they create a -- what they call a legal  
18 fiction to separate the liability from the individual  
19 and the company.

20 In my case, I deliberately chose to be  
21 a sole proprietor. When I act as Joseph M. Walls, I  
22 am acting as Veterans Services. When I act as  
23 Veterans Services, I am acting as Joseph M. Walls.  
24 There is no legal distinction between the two, and

1 that's the case law, and that has essentially already  
2 been recognized by Ms. Edge.

3           So I don't see -- I don't see any legal  
4 authority that would pierce the identification of  
5 Joseph Walls and Veterans Services as being the same.  
6 So when I file an appeal in the name of Veterans  
7 Services, I am filing the appeal in my own name doing  
8 business as Veterans Services. I have the legal right  
9 to call myself whatever I want to call myself. I can  
10 call myself the blue sky if I want to. I have the  
11 legal right to do that. So there's no separation  
12 there. So there's no reason to deny me standing based  
13 upon that issue.

14           On the issue of timing, this may get a  
15 little complicated. The regulation that we're dealing  
16 with, the statute itself, says upon -- the statute  
17 itself says any person whose interest is substantially  
18 affected by an action of the secretary may appeal to  
19 the Environmental Appeals Board within 20 days  
20 after -- and I emphasize "after" -- receipt -- and I  
21 emphasize "receipt" -- of the secretary's decision.  
22 It doesn't say after notification of the decision or  
23 after promulgation of the decision. It says after  
24 receipt of the decision or publication of the

1 decision.

2 Now if you go to the Delaware  
3 legislative handbook, it specifies in there -- I got  
4 copies if you guys want it -- in the Delaware  
5 legislative handbook, it tells you what "or" means.  
6 It says that "or" isn't exclusive. "Or" tells the  
7 reader "A" but not "B," "B" but not "A," but not "A"  
8 and "B." So -- and it tells -- it says that the  
9 decision of which to choose is mine, not DNREC's. I  
10 am saying that I did not receive the secretary's order  
11 until April when I received a certified letter that  
12 actually contained the secretary's order. That's when  
13 I received it. If you wish to go back to the emails,  
14 the email promulgated by --

15 MR. HOLDEN: Mr. Walls, you said you  
16 received a certified letter in April.

17 MR. WALLS: Yes, sir.

18 MR. HOLDEN: When in April?

19 MR. WALLS: April the 24th. I have the  
20 certified letter here with its original content still  
21 in the letter.

22 The -- Noura -- I'm going to mess this  
23 word up, sorry -- Abualfaraj, PhD engineer with DNREC.  
24 I have an email from him dated March the 13th. It

1 says, "A hard copy of this letter will be mailed to  
2 the address you provided." The certified letter is  
3 the hard copy of the secretary's order. I got that  
4 April the 24th.

5 MR. HOLDEN: Was the secretary's letter  
6 also transmitted by that March 13th email?

7 MR. WALLS: This was the cover email.  
8 The cover email contained a copy of DNREC's letter as  
9 an attachment. If you look at the letter -- I don't  
10 know if you guys have the letter in front of you. I  
11 would like to give this to the board. I've got two  
12 copies here.

13 MS. EDGE: I have no objection.

14 MR. WALLS: Thank you.

15 MS. EDGE: That's the letter that  
16 that's the hyperlink; correct?

17 MR. WALLS: Yes, ma'am.

18 MS. EDGE: Email that has the  
19 hyperlink? The secretary's order?

20 MR. WALLS: Yes, ma'am.

21 Now I did a little majoring in English.  
22 I know a little bit about how to structure sentences.  
23 I know a little bit about how to structure paragraphs.  
24 If you look at the March the 13th letter from DNREC,

1 it says here in the second paragraph, "Secretary's  
2 order number 2024 A 0010 was signed on March the 12th,  
3 2024, approving the permit." No hyperlink. I ask  
4 that you take notice of that. There is no hyperlink  
5 at the end of that paragraph.

6 If you go down to the next paragraph,  
7 it says, "The technical response memorandum permit and  
8 hearing officers report can be found at" -- and there  
9 is a hyperlink at the end of that paragraph. When I  
10 clicked on the hyperlink, what pops up is all the  
11 documentation supporting the secretary's decision.  
12 It's not a hyperlink to the secretary's order.  
13 There's a difference. Okay? It may be a problem with  
14 DNREC in the way they construct this notice. It is a  
15 notice that a decision was made, but it is not the  
16 decision. I've been with courts a lot. A lot of  
17 times, the court -- a judge will reclaim a decision  
18 from the bench and then take a week or two to actually  
19 write the order. So there's a difference between  
20 notice and order.

21 When you go back to the statutes  
22 involved in this, there's a problem, and I think  
23 that's where this letter stems from. Under the  
24 Environmental Appeals Board regulations, it says there

1 that an appeal can be filed within 20 days after the  
2 secretary has announced the decision -- announced the  
3 decision, which is what the March 13th letter does.  
4 All right? But there's a difference. The statute  
5 says after receipt of the secretary's decision. It  
6 doesn't say after notice of the secretary's decision.  
7 It also says after publication of the decision. It  
8 doesn't say after notice of the decision. All right?  
9 They can notify as many people as they want to that  
10 there was a decision made; but until that decision is  
11 actually sent out or accessible, it means nothing.  
12 The statute is very specific about that.

13           The regulation rewrites the statute,  
14 and that's where the confusion comes in. If the  
15 regulation would not have changed the wording of the  
16 statute from "received for publication" to  
17 "announced," we wouldn't be sitting here with that  
18 issue before us. I am saying that I received a hard  
19 copy of the April 13th letter on March the 18th. The  
20 attorney general's office does not dispute that.

21           So if you wanted to look at anything,  
22 at the earliest, April 18th is when I actually  
23 received this hard copy of the notice, and it says  
24 right here, "A hard copy of this letter will be

1 mailed." All right?

2 So this letter that is a notice is  
3 conditioned upon the mailing of the notice. I didn't  
4 receive the notice until the 18th. I didn't receive  
5 the actual order until April the 24th.

6 And we were hyperaggressive about this.  
7 We communicated with DNREC before a decision was  
8 noticed. We asked them what's the procedure for  
9 appeal, anticipating that the decision will be made;  
10 and they came back and pointed us to the regulation.  
11 Okay? So you can't say that we weren't involved in  
12 this and tuned into it. All right?

13 When that notice came out, there was no  
14 hyperlink to the secretary's order. That is an error.  
15 It is a substantive error on the part of DNREC. They  
16 cannot use that error against us. When you're faced  
17 with decisions to be made, is it "A" or "B," you have  
18 to choose. All right? If "A" does not contain the  
19 secretary's order, then you have to go to "B," when  
20 the order was actually received.

21 This is not two and three years later  
22 as Ms. Edge threw in there. All right? We were on  
23 this. We were on this back in October. We were on it  
24 in November. We were on it in March or January. We

1 were on it in March, and we were on it in April, and  
2 we're on it today. We're not going away.

3 MR. HOLDEN: Mr. Walls, quick question  
4 for you.

5 MR. WALLS: Yes, sir.

6 MR. HOLDEN: When you received --

7 THE REPORTER: Wait. Who's speaking?  
8 Who's speaking? Sorry.

9 MR. HOLDEN: It's Dean Holden.

10 Mr. Walls, when you received the March  
11 13th email that identified that the secretary's order  
12 had been signed, did you do anything to seek out that  
13 order where potentially the order was published on  
14 DNREC's website?

15 MR. WALLS: I had clicked on the  
16 hyperlink down there, and I didn't see it. There's,  
17 like, 10,000 pages on that thing. I ain't got all  
18 day, you know, weeks to read through it. No, I  
19 didn't -- I'm saying that March 13th was no more than  
20 a notice.

21 MR. HOLDEN: I'm asking what did you  
22 do -- March 13th email notified you that the  
23 secretary's order had been signed approving the  
24 permit.



1 MR. WALLS: Yeah. George, I believe it  
2 was the same day you emailed DNREC and asked them what  
3 the appeal procedures were and I believe they  
4 responded to that letter --

5 MR. X: -- that the secretary's  
6 decision had been made, and I acknowledged that okay  
7 it has been made, but we had never seen it.

8 MR. HOLDEN: Ask for it?

9 MR. X: Yeah. And like he's telling  
10 you, what happened is the link they sent, you go on  
11 there, they got a thing on this chronology that goes  
12 all the way down showing you everything that's been  
13 reviewed by the secretary in reaching the decision.  
14 It's like Joe said. It was a whole 10,000 sheets of  
15 paper.

16 MR. HOLDEN: Do you have record of that  
17 email requesting a copy of the order?

18 MR. X: I mean, you know what? I only  
19 brought some of my files.

20 MR. WALLS: I might --

21 MR. X: Yeah, I didn't bring that  
22 particular one. I only got some of that right here.  
23 But as Joe said, we have been engaged from the moment  
24 of notice -- of public notice. We have a right to

1 know. We've been trying to know.

2 MR. HOLDEN: Mr. George, again, having  
3 not responded to the motion to dismiss, that disallows  
4 you from now arguing against the motion to dismiss.  
5 Mr. Walls has responded to the motion to dismiss. You  
6 need to let Mr. Walls argue against that motion to  
7 dismiss.

8 MR. X: I appreciate that. All I want  
9 to say is this. Let the record show that we launched  
10 this thing jointly March the 31st. I filed -- we  
11 filed an appeal. We submitted a joint thing.  
12 Somewhere along the line, the board has made a  
13 decision to separate his response and not give me  
14 credit for it. So I just want that to be noted.

15 MR. WALLS: If I may --

16 MR. HOLDEN: One second, Mr. Walls.

17 Ms. Edge, did you have one, too?

18 MS. EDGE: I'm just going to -- I have  
19 the website here. If I could ask him if this is the  
20 website on my cell phone that he was asking about?  
21 May I do that?

22 MR. WALLS: I keep a log book. I don't  
23 have the log book with me, but the hyperlink that we  
24 touch had -- yeah. Not this one.

1 MS. EDGE: That's my --

2 MR. WALLS: This is the one that you  
3 sent out with the chronology.

4 MS. EDGE: I suggest that it's DNREC's  
5 website --

6 MR. WALLS: Okay. I ain't got a  
7 problem with that. They can put anything they want to  
8 put on a website. That's not what the statute says.  
9 The statute says upon receipt of the secretary's  
10 order. It doesn't say upon receipt of notice of the  
11 secretary's. There's a difference. Just like she was  
12 saying about splitting hairs. It's a technicality,  
13 but it's a technicality where a lot of cases were  
14 reversed on in courts.

15 MR. HOLDEN: Mr. Walls, the letter  
16 reads to me to be notification --

17 THE REPORTER: Who's talking right now?

18 MR. HOLDEN: This is Dean Holden.

19 The letter included as an attachment to  
20 the March 13th email to me reads to be notification  
21 that the secretary's order has been published.  
22 There's a hyperlink included that takes you to the  
23 DNREC website. That hyperlink has the secretary's  
24 order listed upon it as the first document on the

1 list. Why does that not satisfy 20 days of receipt or  
2 publication or notified of the publication on March  
3 13th or notified of where it was published?

4 MR. WALLS: I would say that because  
5 there wasn't a hyperlink in the notification letter.  
6 See, the problem is, this March the 13th letter, it  
7 limits that hyperlink. It says technical response  
8 memorandum permit and hearing officer's report can be  
9 found at this hyperlink. All right? It doesn't say  
10 the secretary's order can be found. I had no idea.

11 MR. HOLDEN: Ms. Edge, is the permit  
12 and the secretary's order synonymous?

13 MS. EDGE: The permit is separate from  
14 the secretary's order, but if the board would like to  
15 see the website that I just showed him. It has the  
16 same as Noramco.

17 MR. HOLDEN: Okay. The board will get  
18 to it.

19 MS. EDGE: Okay. DNREC would point out  
20 that the secretary's order is clearly listed.

21 MR. WALLS: I mean, then we go back and  
22 look at what the statute actually says. The statute  
23 actually says publication or receipt. It doesn't say  
24 notice, and that's what she's talking about is notice.

1                   Now you can conflate notice to  
2 publication, which I understand that's the direction  
3 maybe you're thinking. But they're not synonymous.

4                   MR. HOLDEN: Would you argue that the  
5 March 13th email letter and hyperlink isn't -- didn't  
6 make you aware of publicly showing the secretary's  
7 order?

8                   MR. WALLS: No. I'm not arguing that.  
9 I'm saying that they notified us that a decision was  
10 made. All right? But they didn't publish the  
11 decision. Not in a format -- they sent this, and this  
12 is not --

13                   MR. HOLDEN: You argue that because you  
14 didn't receive a copy of the secretary's order that  
15 they didn't satisfy the requirements?

16                   MR. WALLS: Yeah. I would argue that.  
17 That's what I'm arguing. And I'm also arguing that  
18 because there was no hyperlink attached to the  
19 paragraph that talks about the secretary's order, I  
20 had no notice or I had no receipt. It wasn't  
21 published. All this is, is a notice. All this is  
22 saying something happened. It's not saying what  
23 happened.

24                   MR. HOUGHTON: I just have one

1 question. This is Mike Houghton. I just want to be  
2 sure from whoever can answer. Maybe the attorney  
3 general can answer this. When was the order actually  
4 published on the DNREC website?

5 MS. EDGE: March 13th.

6 MR. HOUGHTON: March 13th is when it  
7 was published?

8 MS. EDGE: The day that the emails were  
9 sent out with the hyperlinks, it was on the website.

10 MR. HOUGHTON: So if I just as an  
11 interested citizen, not a party to this proceeding,  
12 wanted to find out the order was published, I could  
13 have gone on that website and I could have found it.  
14 And I've worked with it before. I have seen lots of  
15 things posted on it, but you can find generally what  
16 you want by opening it up and scrolling through it and  
17 finding what you're looking for. So it was the 13th?

18 MS. EDGE: Yes.

19 MR. HOUGHTON: Thank you.

20 MR. WALLS: If I may, the only thing I  
21 would point out is that the regulation says receipt of  
22 the secretary's order or publication of the  
23 secretary's order. This legislation on the definition  
24 of order allows the party to choose which they wanted

1 to act upon, and I'm saying that primarily we're  
2 acting upon the fact that we never received a copy of  
3 the secretary's order even though DNREC knew that we  
4 were a very interested party in this case. So they  
5 should have sent us a copy of the order.

6 And when it mentions in there in the  
7 cover email that they're going to send us a hard copy,  
8 we had a right to rely upon that. So at least the  
9 18th -- March the 18th when I asked for a copy, even  
10 though the secretary's order is not in there, I will  
11 concede that March the 18th would be a hard date. I  
12 will concede that. But March the 13th is not a hard  
13 date.

14 MR. HOLDEN: Mr. Walls, but the email  
15 says a hard copy of this letter. It doesn't say a  
16 hard copy of the order.

17 MR. WALLS: I agree with you. It's  
18 very confusing, and it's very confusing for me as a  
19 layperson. It's confusing to you guys. And when  
20 you're -- when you're dealt with an ambiguity, case  
21 law is that the ambiguity is interpreted in favor of  
22 the nonmoving party, which is me. That's me. That's  
23 the law.

24 MR. HOUGHTON: Mr. Reporter, it's Mike

1 Houghton.

2                   Sir, I understand you see this as  
3 ambiguous, and just speaking for myself, I don't see  
4 ambiguity in here at all. In my experience as an  
5 administrative law practitioner for 40 years, I've  
6 never seen a circumstance where there's a choice in  
7 the statutory language between receipt of the decision  
8 or publishing of the decision. I don't think a party  
9 gets to pick and choose which is the end point. I  
10 think the language is not ambiguous. It's not  
11 confusing. I think the fact that it was published --  
12 it was available to you and published on the 13th, my  
13 own view just as one person on this panel, is that's  
14 controlled. So my view is I understand your  
15 arguments. I don't agree with them, but I appreciate  
16 the presentation.

17                   MR. WALLS: Thank you.

18                   MR. HOLDEN: Mr. Walls, Dean Holden. I  
19 would offer you about ten minutes left of that 30  
20 minutes. We have talked about DNREC had three issues  
21 in the motion to dismiss. The issue of being pro se.  
22 I think that's been addressed by both parties. We  
23 talked a fair amount about timeliness. I don't know  
24 that I've heard a lot about standing.



1 MR. WALLS: And standing.

2 MR. HOLDEN: Would you consider talking  
3 to that?

4 MR. WALLS: Yes, sir. When you talk  
5 about standing, Delaware constitutional law and United  
6 States constitutional law are basically the same.  
7 There has to be a cause in controversy involved in the  
8 case. In other words, you have to have some kind of  
9 personal interest in the case. Somehow, you were  
10 injured by the case. That's what gives you standing.  
11 If you are as an academic exercise challenging  
12 something just because you wanted to see how it comes  
13 out, that's not standing. You can't go in and just  
14 claim that I have an interest. You have to be able to  
15 show something. You have to show that you either  
16 benefitted or lose by the decision that was made.

17 Now when you talk about standing, the  
18 first thing I want to address is that the attorney  
19 general's office and DNREC -- DNREC made a decision in  
20 this case. All right? DNREC, once they made their  
21 decision, that was passed off to Noramco. So really,  
22 the only parties to this appeal is Noramco and Joseph  
23 Walls. George X, too. But what we're talking about  
24 here is Noramco and Joseph Walls are all -- yeah.

1 Noramco and Joseph Walls. DNREC has no dog in this  
2 fight. They made a decision. They decided to grant  
3 the permit. Once that's done, there is no case law  
4 anywhere in any civil realm where the party that made  
5 the decision, the administrative board that made the  
6 decision comes in and is a party to the lawsuit.  
7 That's not the way it works.

8           So the attorney general's office  
9 obviously should not be here, and DNREC should not be  
10 here. Noramco should be sitting here. Joseph Walls  
11 should be sitting here. Noramco is the only one that  
12 has standing to defend or challenge the decision that  
13 was made by the secretary.

14           On my standing, for Joseph Walls in  
15 particular, I'm a board member to a school at --.  
16 We're doing a mural outside the school now. I got  
17 pictures of it, you guys. I got them before and  
18 after. Nice pictures. But I'm there on a weekly  
19 basis.

20           I also advocate on behalf of people  
21 that live in that area. Every time I go into that  
22 area -- or let me say this. I'm a hundred percent  
23 disabled veteran. I am 30 percent disabled because I  
24 have asthma. You guys heard about the burn pit

1 controversy with the veterans, how it took 20 years  
2 before they started recognizing the effects of that  
3 pollution upon the soldiers. You've heard about Agent  
4 Orange, how it took 20-30 years to get recognition  
5 that the orange had harmed soldiers. When I go into  
6 this area and I advocate for elder soldiers and other  
7 people that live in that area, I am affected by that  
8 pollution. I start having running noses. I have  
9 running eyes. My respiratory is challenged.  
10 Everything about my asthma picks up.

11 So I'm saying that I have personal  
12 standing because I am personally injured by the  
13 pollution and the poisons coming out of Noramco's  
14 stacks. That is my standing. This is not a  
15 hypothetical. This is not an academic exercise. This  
16 is a personal thing. When my health is personally  
17 affected by what is going on in Noramco. That's what  
18 I have to say on the standing issue.

19 MR. HOLDEN: This is Dean Holden. Are  
20 there any questions from the board on the matter of  
21 standing?

22 MR. HOUGHTON: I have one question.  
23 Just so I understand comments that were made earlier,  
24 has the issuance of this permit increased emissions

1 into the community from the facility? Can anyone  
2 answer that?

3 MR. WALLS: Can I say something on  
4 that?

5 MR. HOUGHTON: Sure.

6 MR. WALLS: We were in a public  
7 information session, and they had a graph there that  
8 showed what their allowable pollutions limit is. I  
9 don't know. I think it was in the nature of, like, 20  
10 tons combined that they were allowed to release.

11 Their argument was that currently we  
12 only release, like, three and a half tons of pollution  
13 whereas we're allowed to release 20 tons of pollution.  
14 So they say, Noramco, that when they put this new  
15 production, new scrubber, they're adding to capacity.  
16 They're adding to production. All right? When they  
17 do that, it's going to increase their admissions from  
18 three and a half to, like, seven tons. It's under the  
19 20, but it's doubling what they're already releasing.

20 So there is an increase in pollution.  
21 There's not an increase in what they're allowed to  
22 produce, but there is an increase -- a substantial  
23 increase in the pollution that they are currently  
24 emitting.

1 MR. HOUGHTON: What does the attorney  
2 general's office say?

3 MS. EDGE: That there is no increase in  
4 the limit to -- compounds or hazardous air pollutants.  
5 They can increase -- they have -- they do different  
6 lines of compounds, so they create medicines and they  
7 can emit up to the current cap for BOCs and hazardous  
8 air pollution -- pollutants. That does not change  
9 from the permits. They are adding, like, a scrubber,  
10 which is an air pollution control device. They are  
11 adding equipment to allow them to do different lines.  
12 They still are emitting, to some extent, -- vessels,  
13 which do not believe that they are increasing. So  
14 they can emit more pollution than they are right now.  
15 Like last year, they could emit more pollution than  
16 they actually are. They had permission to do that,  
17 and they have that same permission now. They just  
18 can't do a different product.

19 MR. WALLS: There is an increase in  
20 what they're polluting now.

21 MS. EDGE: I do not believe there's --  
22 I do not believe that that's necessarily true.

23 MR. HOUGHTON: Thank you.

24 MR. WALLS: Well, it's a disputable

1 issue. You can't resolve that.

2 MR. HOLDEN: So this is Dean. Let me  
3 get this straight. Mr. Walls, one second. Dean  
4 Holden speaking. Do you have any other questions from  
5 the board? Mr. Marcozzi, Mr. Horne, any questions  
6 from you?

7 MR. MARCOZZI: Not here.

8 MR. HOLDEN: Thank you. Maybe hear the  
9 group.

10 Mr. Walls, you have a few minutes left  
11 here.

12 MR. WALLS: All right. So to wrap it  
13 up, what we're looking at, I'm assuming, is the timing  
14 issue is the dispositive issue here. Is that correct?

15 MR. HOLDEN: DNREC say both standing  
16 and timeliness are --

17 MR. WALLS: Okay. All right. We're  
18 good.

19 MR. HOLDEN: You wrapping it up with  
20 that?

21 MR. WALLS: Yes, sir.

22 MR. HOLDEN: Thank you, sir.

23 Ms. Edge, any rebuttal?

24 MS. EDGE: Just briefly. As Mr.

1 Houghton pointed out, this is a fairly clear issue.  
2 The appellants had notice. It was sent directly to  
3 them by email. They had access to all documents  
4 online. It makes no sense to argue that every person  
5 in Delaware, I guess, or the world is entitled to  
6 personal notice and that their appeal period would run  
7 from receipt of a paper copy of a document. It  
8 wouldn't make any sense to have an appeal period if  
9 anyone could just say to an agency to send them a  
10 certified copy of this and when they got a paper copy,  
11 even though they've known for who knows how long, that  
12 the appeal period would --. I believe that I've  
13 showed that this appeal was filed after the  
14 jurisdictional appeal period and should be dismissed  
15 for that reason.

16 As to standing, Veterans Services --  
17 Joseph Walls is all of Veterans Services because he is  
18 a sole proprietor. Veterans Services is not all  
19 physical. Joseph Walls is Veterans Services when he's  
20 acting in that capacity. And when he's canvassing the  
21 neighborhood or doing political activities, business  
22 of Veterans Services is not to do political  
23 activities. It's not to act as a board member. And  
24 the only personal impact that Mr. Walls points to is

1 personal and not related to Veterans Services, who is  
2 the appellant here.

3 Also, as he points again to the fact  
4 that if this permit was revoked, the same amount of  
5 BOCs and air pollutants could be emitted by the  
6 facility, so this is not an injury that's redressable.

7 And also, it's not DNREC's  
8 responsibility to bring in necessary parties, not to  
9 bring Noramco into this. It would be the appellant's  
10 responsibility to include necessary parties that --.  
11 That's not the state's responsibility. This order was  
12 posed to the community on March 13th. The appellant  
13 said it in their appeal --.

14 MR. HOLDEN: Thank you, Ms. Edge.

15 Dean Holden speaking.

16 Any closing questions from the board?

17 Is there a motion for --?

18 [UNIDENTIFIED SPEAKER]: So moved.

19 [UNIDENTIFIED SPEAKER 2]: I'll second.

20 MR. WALLS: Could I ask you one  
21 question? Would we have time to file a memorandum  
22 based upon this hearing before you make a decision?

23 MR. WALLS: So Mr. Walls, what we're  
24 going to do now is the board's going to move into



1 executive session -- and potentially take a break and  
2 then we'll come back in session and have an  
3 opportunity to get back with you.

4 Janelle, are we going to stay in this  
5 room and ask the parties to step out?

6 MS. SAPP: Yes. I'll ask them to step  
7 into the breakroom.

8 MR. X: -- I just want to turn your  
9 attention to Title No. 6535.

10 MR. HOLDEN: -- Mr. X? I'm sorry. --  
11 can't argue against motions.

12 MR. X: I don't want to argue against.  
13 I just want to offer some -- by the definition of the  
14 one thing quoted in that statute. The general  
15 assembly rhetoric that we're provided, it said that  
16 each --

17 MR. HOLDEN: Mr. X, I'm going to ask  
18 you not to continue. Let the board move into  
19 executive session. Thank you, sir.

20 MR. X: Okay. Thank you.

21 MS. SAPP: Also let the court  
22 reporter --. We'll be in room one.

23 THE REPORTER: Wait. Wait. I can't  
24 hear you, Janelle. What'd you say about me?

1 MS. SAPP: So we're going into  
2 executive session, so I'm going to separate the room,  
3 so you'll be in room two and executive session will  
4 happen in room one.

5 THE REPORTER: Okay. So should I --  
6 I'll go off the record, then, and then come back when  
7 they come back from executive session?

8 MS. SAPP: Yes. I'll bring you back in  
9 when we're back into public session.

10 THE REPORTER: Okay. Okay. That's  
11 fine. So I'm just going to go off the record at 10:02  
12 a.m., and then I'll go back on when --

13 (Off the record.)

14 MR. HOLDEN: All right. We're back in  
15 public session.

16 Mr. Haut, it's Dean Holden speaking.  
17 Can you hear us? Are you with us?

18 THE REPORTER: Yep. I can hear you  
19 guys all good and I'm here and recording. So ready to  
20 go.

21 MR. HOLDEN: Okay. Thank you.

22 All right. From the board, is there  
23 anyone interested in a motion?

24 MR. HOUGHTON: Yes. It's Michael

1 Houghton. I would like to make a motion to dismiss  
2 the appeal on two bases. First is that the appeal was  
3 not timely. The second is that there's a lack of  
4 standing. Would I need to question that any further?

5 MR. HOLDEN: So there is a motion. Is  
6 there a second?

7 MR. HORSEY: Mike Horsey. Second.

8 MR. HORNE: I'll second.

9 MR. HOLDEN: All right. And  
10 discussion, I've got -- and I also ask if you have any  
11 inclusion of -- represent?

12 MR. HOUGHTON: Yes. I think there has  
13 been recognition -- Mr. Walls representing Veterans  
14 Services was granted the ability to pursue the appeal.  
15 However, the fact that another party was not permitted  
16 status to pursue the appeal although there has been  
17 some periodic comments that have been made, all that  
18 would be upheld in terms of status of hearing.

19 Substantively, after we crossed that  
20 bridge earlier in the day and the appeal was not  
21 timely and there was a lack of standing on the part of  
22 Veterans Services represented by Mr. Walls.

23 MR. HOLDEN: Any other discussion on  
24 the motion? All right. I'm going to ask for a roll

1 call vote. I'm going to start with Ms. Wicks.

2 MS. WICKS: Deborah Wicks. I'm in  
3 favor of the motion.

4 MR. HOLDEN: Mr. Horsey?

5 MR. HORSEY: In favor.

6 MR. HOUGHTON: I'm in favor of the  
7 motion.

8 MR. HOLDEN: Mr. Marcozzi?

9 MR. MARCOZZI: I vote in favor of the  
10 motion.

11 MR. HOLDEN: Mr. Horne?

12 MR. HORNE: I vote in favor of the  
13 motion.

14 MR. HOLDEN: And I, Dean Holden, vote  
15 in favor of the motion as well. The motion carries  
16 unanimously.

17 To the parties, the board has 90 days  
18 to issue a written order. That written order will be  
19 delivered via certified mail. If the parties have  
20 interest in appealing that written order, the timeline  
21 of that starts -- so it doesn't start until you  
22 receive that written order, and that'll come to you  
23 sometime here in the next 90 days.

24 With that, today's hearing is complete.

1 Thank you so much for joining us.

2 THE REPORTER: Going off the record at  
3 10:18 a.m.

4 (Whereupon, at 10:18 a.m., the  
5 proceeding was concluded.)  
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CERTIFICATE

I, SAMUEL HAUT, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



SAMUEL HAUT

Notary Public in and for the  
Commonwealth of Pennsylvania

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I, JULIE GROCE, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



JULIE GROCE

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