



500 Swedes Landing Road
Wilmington, DE 19801

noramco.com

STATE OF DELAWARE

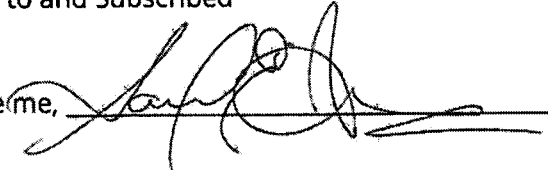
COUNTY OF NEW CASTLE

Ryan Haemmerle of full age, being duly sworn according to law, deposes and says:

1. I have been the Director of Operations at Noramco in Wilmington, Delaware since April 4, 2022.
2. I certify that the Noramco process information contained in the cover letter, form AQM-2, AQM-5, and Attachments 2,3, and 6 constitute highly confidential and proprietary information of Noramco.
3. Both the identity of the raw materials which Noramco uses for the D8/D9 process, and the details of the chemical process itself, were developed with an investment of very considerable time and expense and are trade secrets of Noramco. If these pieces of information were to fall into the hands of Noramco's competitors, it would constitute a very considerable loss of Noramco's investment, competitive position, and intellectual property, which it has attained by virtue of that investment.

Ryan Haemmerle
Director of Operations
Noramco

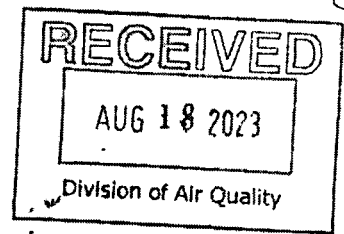
Sworn to and Subscribed

Before me,  this 17th day of August, 2023.



500 Swedes Landing Road
Wilmington, DE 19801

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August 17, 2023

Secretary Shawn M. Garvin
DNREC Office of the Secretary
89 Kings Highway
Dover, DE 19901

RE: Confidentiality Substantiation of Information Included in the Permit Application for the D8/D9 process

Dear Secretary Garvin:

Pursuant to the Department's Freedom of Information Act Policy, 29 Del. C. Chapter 100, Noramco, at 500 Swedes Landing Road, Wilmington, DE 19801, is requesting that certain information disclosed in the permit application for the D8/D9 process be entitled to confidential treatment.

- The following portions in the application should be entitled to confidential treatment:
 - Cover Letter - Product name details
 - Form AQM-2 - Process flow diagram
 - Form AQM-5 - Batch duration information
 - Attachment 2 - Emissions Analysis process information/raw materials
 - Attachment 3 - Emissions Determination Sheet
 - Attachment 6 - SDSs information on product/raw materials

Noramco has taken measures in order to protect undesired disclosure to others through the following:

- Employee Agreement (Noramco Policy)—A signed agreement of every employee at Noramco to ensure the secrecy of confidential information. Section 6 of the agreement states.

"You acknowledge that CONFIDENTIAL INFORMATION is of great value to the COMPANY, that the COMPANY has legitimate business interests in protecting its CONFIDENTIAL INFORMATION, and that the disclosure to anyone not authorized to receive such information, including a COMPETITOR, will cause immediate irreparable injury to the COMPANY. Except as required by your duties for the COMPANY, you will not use, disclose, disseminate, lecture upon or publish any