



108 Patriot Drive
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October 24, 2023

Amy Mann
Engineer Program Manager
Department of Natural Resources and Environmental Control
Division of Air Quality
715 Grantham Lane
New Castle, DE 19720

Re: Docket# 2023-P-A-0018 Noramco Air Quality Permit and Wilmington, DE

Dear Mrs. Mann:

This letter comes to provide a comment on the above-referenced proposal by Noramco, Inc. to install a new vacuum pump and an expansion manufacturing process for two new products (known as D8 and D9), which will emit 0.5 tons of volatile organic compounds (VOCs) per 12-month rolling period and will emit 0.22 tons of hazardous air pollutants (HAPs) over the same period¹.

Although the proposed expansion is within the maximum limit allowed by the State of Delaware Department of Natural Resources and Environmental Control (DNREC) for emissions of HAPs, we oppose the proposal due to the actual threat of such proposal to human life.

We must strongly oppose the expansion of any processing that will emit additional HAPs into the environment of Eastside Wilmington, Delaware for the following reasons:

¹ <https://documents.dnrec.delaware.gov/Admin/Hearings/2023-P-A-0018/Exhibits/Noramco-Permit-Application-APC-2023-0086-CONSTRUCTION-Fact-Sheet.pdf#:~:text=Noramco%20currently%20operates%20under%20Title%20V%20Permit%3A%20AQM-003%2F00324,emissions%20to%209.9%20tons%20per%2012-month%20rolling%20period.>



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1. The impact of the novel coronaviruses, e.g., Covid-19 upon the entire State of Delaware has revealed the health status of the residents of Wilmington, Delaware is compromised by secondary health challenges, e.g., asthma, diabetes, respiratory failures, cancer, obesity, etc. subsequently, the residents of Eastside Wilmington, Delaware have weakened immune systems².
2. According to Medical News Today, a person might have a higher risk of developing severe symptoms if they are older, have a weakened immune system, or have another health condition³.
3. Governor John C. Carney issued the “Declaration of a Public Health Emergency for the State of Delaware” dated, April 12, 2021, notifying everyone that does business within the State of Delaware and the residents of the imminent threat to human life, then implemented a protocol to support healthcare workers as they aid residents preserve their lives and health⁴.
4. The Governor’s Declaration and the supporting intelligence data explain that the health of Eastside residents, i.e., children, elderly, pregnant mothers, etc. are in peril and in need of protection.
5. The emission of additional HAPs, including Methylnaltrexone bromide, may subject the residents, their families and people doing business in Delaware to a health crisis that is irreparable.

² <https://myhealthycommunity.dhss.delaware.gov/locations/state>

³ <https://www.medicalnewstoday.com/articles/coronavirus-effects-on-body>

⁴ <https://governor.delaware.gov/health-soe/public-health-emergency/>



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6. It is unclear at this stage of the investigation whether Noramco's past emissions of HAPs have contributed to the current health crisis and deaths being experienced in the communities.
7. According to the State of Delaware Division of Corporations, Noramco has been "silently" doing business within the Eastside of Wilmington, Delaware for, at least, twenty (20) years serving their pharmaceutical customers⁵ while emitting HAPs upon the residents and presenting civility⁶.
8. We are concerned that Noramco may be a part of the organized activities announced by Oklahoma Cleveland County District Judge Thad Balkman on or about August 27, 2019, where "Johnson & Johnson and its subsidiaries helped fuel the state's opioid crisis and ordered the products giant to pay \$572 million"⁷.
9. Finally, although the current proposal by Noramco is within the maximum limits set by DNREC, we do not believe the current health crisis within the Eastside Wilmington community was a factor considered by DNREC in setting their maximum limits.

⁵ <https://www.noramco.com/about-us/>

⁶ <https://thepublicsradio.org/article/for-nearly-a-decade-two-ri-opioid-manufacturers-made-billions-of-opioid-doses>

⁷ <https://apnews.com/general-news-29a69a81c0174c50bda7a190b03d65cc>



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For the reasons set forth in this letter and others yet developed we strongly opposed any expansion proposed by Noramco that will emit additional HAPs into the Eastside communities and suggest that the State of Delaware's Attorney General establish an independent investigation team to investigate these concerns.

Sincerely,

George X
President

GX/

Cc: Kathleen Jennings, DE Atty. Gen.