

DNREC VIRTUAL PUBLIC HEARING

Noramco Inc. Application for) Docket No.
Natural Minor Construction) 2023-P-A-0018
Permit)

A virtual hearing was taken pursuant to notice before Ellen Corbett Hannum, Registered Merit Reporter, in Delaware, on Tuesday, November 7, 2023, beginning at approximately 6:00 p.m., there being present:

BEFORE: THERESA SMITH, DNREC HEARING OFFICER

VIRGINIA JACKSON, DNREC
TANESHA PERRY, DNREC
NOURA ABUALFARAJ, DIVISION OF AIR QUALITY
DAVE TENNETT, Noramco Inc.
AMY MANN, DNREC

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APPEARANCES :

SPEAKERS FROM THE PUBLIC :

- GEORGE X
- JOSEPH WALLS
- DONALD FARRELL
- WILLIE SCOTT
- DAVON HALL

E X H I B I T S

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DNREC Exhibits Marked on Page 17

Exhibit 1: Application materials for D8/D9 Permit Application and Confidentiality Request. (Aug. 14, 2023)

Exhibit 2: Request for a public hearing from Davon Marque Hall. (Sept. 2, 2023)

Exhibit 3: Public hearing notification letters to Noramco Inc. (Applicant via Certified) and Davon Marque Hall. (Sept. 27, 2023)

Exhibit 4: Public notice of the Noramco application in the News Journal, in the Delaware State News and on the DNREC Website. (Aug. 20, 2023)

Exhibit 5: Public notice of the public hearing in the News Journal, in the Delaware State News, on the DNREC Website (Oct. 1, 2023) and on the state public meeting calendar. (Sept. 27, 2023)

Exhibit 6: Permit Application Fact Sheet

Exhibit 7: DNREC Presentation

Applicant's Exhibit Marked on Page 25

Exhibit 1: Noramco Public Hearing Air Permit Presentation

1 HEARING EXAMINER SMITH: Good evening. I
2 believe everyone is connected and ready to go. So we
3 will now begin the formal proceeding before us tonight.

4 I want to thank you for taking your time
5 out of your busy schedules to join us. The time is now
6 6:01 p.m., on Tuesday, November 7th, 2023.

7 Before we get into logistics of tonight's
8 hearing, I have Virginia Jackson with the Department's
9 Office of the Secretary to go over the close captioning
10 feature which is available in multiple languages on the
11 Zoom platform.

12 Ms. Jackson, please proceed.

13 MS. JACKSON: Hello, my name is Virginia
14 Jackson. I am an administrative specialist with the
15 Office of the Secretary here to assist the Hearing
16 Officer here tonight.

17 I would like to make sure that everyone is
18 aware that the Zoom platform we are using has the ability
19 for closed captioning and multiple languages. To start
20 closed captioning, if you are using a computer, at the
21 bottom of your screen you should see a "Show Caption"
22 button. If you do not see the "Show Caption" button, you
23 may have to select the three dots that say "More." Once
24 you find the "Show Caption" button, you should click the

1 caret pointing up, which will bring up your translation
2 options. You can select your preferred language from
3 there. If your preferred language is not listed, you can
4 select "More" and all of the languages will be listed.

5 If you are on a smartphone, at the bottom
6 of your screen, select the caption button indicated by
7 "CC." If your preferred language is not listed at the
8 bottom, you may have to select the three dots that say
9 "More." You should then select "Meeting Settings" with
10 the gear icon next to it. Once the settings page comes
11 up, located at the very bottom select "Translation
12 Language."

13 From there you will be able to select your
14 preferred language, and then select "Done" at the top
15 right corner, and then "Done" again. If the captions are
16 not automatically popping up yet, you may need to select
17 "Captions" again and select "Show Captions."

18 Now I will turn it back over to the
19 Hearing Officer, Theresa Smith.

20 HEARING OFFICER SMITH: Thank you,
21 Ms. Jackson.

22 We are here this evening to provide the
23 virtual platform for the State of Delaware's Department
24 of the Natural Resources and Environmental Control to

1 conduct its formal public hearing on the Natural Minor
2 Construction Permit Application of Noramco, Inc.

3 My name is Theresa Smith, and Cabinet
4 Secretary Garvin has appointed me to serve as a Hearing
5 Officer for tonight's formal proceeding. Pursuant to
6 DNREC's hearing protocols, this hearing is being
7 conducted virtually. Zoom does generate a list of those
8 who are present at tonight's hearing for the Department
9 to have a record of.

10 At the conclusion of my introductory
11 remarks, I will be introducing the Department's Division
12 of Air Quality representative, and then Noramco's
13 representative to provide the presentations for
14 incorporation into the hearing record.

15 Following the conclusion of the
16 presentations, we will then begin the public comment
17 portion of the hearing. There is a court reporter
18 present with us tonight who is preparing an official
19 verbatim transcript. The transcript will be posted on
20 the hearing webpage dedicated to this matter as soon as
21 it is received.

22 Before we go any further, it is important
23 to set the parameters for tonight's proceeding. First
24 and foremost, this is a formal legal hearing. It is not

1 a public information session nor an informal type of
2 workshop or town hall event. There will be no Q and A or
3 chat session permitted at the hearing. The purpose of
4 the hearing tonight is to build a record regarding the
5 Noramco permit application by providing a formal legal
6 platform for the public to learn about the proposed
7 application, and enable the public to offer live comment.

8 All comments, those provided tonight and
9 those provided in writing, are given the same weight.
10 While all comments are appreciated, each comment must be
11 limited solely to the subject matter of tonight's
12 hearing. Multiple comments, saying the same thing do not
13 outweigh one singular comment. Simply put, comments are
14 not votes. A single, well-supported comment may carry
15 more weight than a thousand form letters.

16 I also want to note that only comments
17 submitted directly to DNREC and entered by myself into
18 the hearing formal record in this matter will be posted
19 on the hearing page and be considered by the Department
20 as part of the permitting matter decision process.

21 The Department has not partnered with any
22 outside organization or websites to assist with the
23 public submission of comments in this matter. So, again,
24 only submit comments to DNREC directly.

1 For those who preregistered with DNREC to
2 offer live comments this evening, they will be recognized
3 in the order that their preregistration was received.
4 And each commenter will be given three minutes to provide
5 their verbal comment. If you are unable to finish your
6 comment within the three minutes, you are encouraged to
7 submit your full comments in writing to DNREC.

8 Again, all comments have equal weight
9 whether they are offered live this evening at the hearing
10 or in writing between now and when the hearing record
11 closes, which will be on November 22nd, 2023.

12 I will provide more details about the
13 comment portion of the proceeding after the presentations
14 conclude. I would encourage those attending this evening
15 to go to DNREC's hearing webpage under the Administrative
16 Law Section, where you can find more details concerning
17 the permitting matter.

18 The presentations offered tonight, along
19 with the related documents to the applications, are
20 posted on the Department's hearing webpage dedicated to
21 this matter.

22 Now, the following protocols apply to all
23 DNREC public hearings. First, all comment received must
24 be limited solely to the subject matter of the hearing

1 tonight, which again is the Natural Minor Construction
2 Permit Application of Noramco. All comments pertinent to
3 the subject matter of this virtual hearing will be
4 incorporated into the record and posted on the hearing
5 webpage dedicated to this matter.

6 Two, in order to ensure that everyone who
7 wishes to offer comment for the Secretary's consideration
8 is accommodated, the record in this matter shall remain
9 open for receipt of public comment following tonight's
10 proceeding through November 22nd, 2023.

11 Three, there's only one authentic record
12 of the formal proceeding tonight and it is the court
13 reporter's official verbatim transcript, which will be
14 posted on the hearing webpage as soon as it is received.

15 The statutory purpose of tonight's hearing
16 is to build a record with regard to the permitting
17 matter. A record consisting of the transcript of the
18 hearing tonight, all comments, all exhibits, and
19 eventually my report will be reviewed by Secretary
20 Garvin.

21 The Secretary will ultimately issue an
22 order following the review process, and that order will
23 contain his decision in this matter and the reasons
24 therefor.

1 Lastly, it is important to note that a
2 decision has not been made by the Department nor will any
3 decision be made tonight with regard to the pending
4 permit matter.

5 Again, the public comment period will
6 remain open through November 22nd, 2023 so that the
7 members of the public are offered the opportunity to
8 offer written comments for the Secretary's consideration
9 should they wish to do so.

10 At the conclusion of my introductory
11 remarks, I would like to introduce from the Division of
12 Air Quality's professional staff, Ms. Noura Abualfaraj,
13 who will provide a presentation on behalf of the
14 Department tonight.

15 You may begin when you are ready.

16 MS. ABUALFARAJ: Thank you, Theresa. Good
17 evening everyone. My name is Noura Abualfaraj. And I am
18 an engineer with DNREC's Division of Air Quality in the
19 Engineering and Compliance Section. I am the assigned
20 project engineer for Noramco.

21 This evening, on behalf of the Division of
22 Air Quality, I will be presenting an overview of the
23 permit application. I will provide a summary of the
24 project and the emissions associated with it. I will

1 also provide a summary of the Division of Air Quality's
2 permitting process in general.

3 And finally, I will identify the list of
4 exhibits pertaining to the project that the Division of
5 Air Quality would like to have admitted as part of the
6 hearing record.

7 Noramco initially submitted an application
8 for a construction permit on April 13th of this year. At
9 that time, the application was for the addition of a new
10 production line to the facility to manufacture two new
11 products. After submitting the application, Noramco
12 later amended it to include the installation of a new
13 vacuum pump, as the existing equipment in the facility
14 would not be able to support the proposed project.

15 The revised application was then received
16 on July 17th, and further revisions were received on
17 August 14th. The application was then advertised on
18 August 20th in the Delaware State News and The News
19 Journal for 15 days.

20 The Department received a request for a
21 public hearing on September 2nd. The public hearing was
22 then scheduled and advertised on October 1st, again, in
23 the Delaware State News and News Journal.

24 The Department also scheduled a community

1 information session, which was held on October 24th. The
2 information session was also advertised along with the
3 public hearing in the October 1st notice.

4 That brings us to this evening's public
5 hearing on November 7th. The public comment period will
6 remain open for 15 days after the hearing and close on
7 November 22nd, 2023.

8 Noramco is a batch pharmaceutical
9 manufacturing facility. They are located at 500 Swedes
10 Landing Road in Wilmington, Delaware. They make
11 pharmaceutical intermediates that are the active
12 ingredient for various medications.

13 Noramco is requesting a construction
14 permit to install a new vacuum pump to support a new
15 production line for two new products.

16 The new products will go into medication
17 that is prescribed to support patients undergoing
18 treatment for cancer, HIV, and anorexia.

19 Noramco is a Title V facility. This means
20 that the potential emissions from the facility, before
21 taking any control devices into consideration, are above
22 the major source threshold. The major source threshold
23 for volatile organic compounds, or VOCs, and hazardous
24 air pollutants, or HAPs, in New Castle County is 25 tons

1 per year. Noramco's facility-wide Title V permit limits
2 their annual 12-month rolling emissions to 20.1 tons per
3 year of VOCs; 10.7 tons per year of all combined
4 hazardous air pollutants, and 9.9 tons per year of any
5 individual HAP.

6 Noramco is not requesting an increase to
7 these facility-wide emission limits as part of this
8 application.

9 The potential emissions from this process
10 are as shown on the table on this slide. As I mentioned
11 earlier, these are the uncontrolled emissions, meaning
12 that they are calculated before any control devices. The
13 total uncontrolled emissions for both processes combined
14 are 4.9 tons per year of VOCs and 2.6 tons per year of
15 HAPs. And as I mentioned on the previous slide, the
16 major source threshold for VOCs and HAPs is 25 tons per
17 year.

18 Emissions from the proposed process will
19 be directed to one of two existing control devices at the
20 facility. The two control devices are the caustic
21 scrubber, which has a destruction efficiency of 93
22 percent, and the carbon adsorption system which has a
23 destruction efficiency of 95 percent.

24 And so the controlled emissions for both

1 steps of the process are 0.5 tons per year of VOCs and
2 0.22 tons per year of HAPs.

3 This table lists the individual VOCs and
4 HAPs that make up those totals, as well as the controlled
5 emissions associated with each pollutant. So these will
6 be the emission limits that would go into the permit.

7 Noramco calculates potential emissions
8 based on a maximum number of batches they are able to
9 produce in a year. In reality, the actual number of
10 batches they produce in a year will be lower than
11 estimated due to certain constraints, such as processes
12 that are not able to run at the same time.

13 The actual facility-wide emissions
14 reported by Noramco for 2021 and 2022 are roughly
15 one-and-a-half tons per year of VOCs and under a ton per
16 year of HAPs.

17 The Division of Air Quality also conducted
18 an AERSCREEN Dispersion Modeling Analysis. AERSCREEN is
19 a modeling tool used to calculate how a pollutant
20 emitted by a source will disperse in the air. The model
21 estimates a maximum downwind concentration, or MDC, of a
22 pollutant from a source. We then compare that model MDC
23 value to an established threshold limit value or TLV. A
24 TLV is essentially the concentration of a given airborne

1 pollutant below which no adverse health effects are
2 expected to occur from long-term exposure.

3 We then apply a safety factor of 100 to
4 account for different ages, health conditions, genders
5 and body types. So in order to meet the Department's
6 criteria, the TLV-to-MDC ratio needs to be greater than
7 100 to 1 in order to be protective of public health,
8 safety, and welfare.

9 The table on the slide shows the results
10 of the AERSCREEN Dispersion Model. What you can see in
11 the last column of the table is that the TLV-to-MDC ratio
12 for all pollutants associated with this permit are above
13 100 to 1.

14 And so, based on the results of the
15 modeling, this process meets DNREC's screening criteria
16 of 100 to 1, and so public health, safety, and welfare
17 are presumed to not be adversely impacted.

18 For every permit application received by
19 the Division of Air Quality, there is a review process
20 that takes place before a permit can be issued. First,
21 we review the application for administrative and
22 technical completeness.

23 We then look at zoning and verify proof of
24 local zoning, and determine if a coastal zone permit is

1 required if the facility is located in the coastal zone.

2 We then review all the technical
3 information included in the application, and confirm the
4 accuracy of the emission calculations.

5 The application legal notice will then be
6 advertised, which is when we conduct air dispersion
7 modeling and then conduct a regulatory review to
8 determine what applicable federal and state requirements
9 need to be included in the permit.

10 All of that information is then used to
11 draft the technical memorandum. The technical memorandum
12 then becomes the basis for the emission limits, operating
13 limits, monitoring, testing, recordkeeping and reporting
14 requirements that go into the permit.

15 Following the close of the public hearing
16 comment period, if the Secretary approves the permit,
17 then the Division of Air Quality will issue a
18 construction permit that meets strict air quality
19 standards under federal and state regulations. The
20 permit will be supported by a detailed technical review,
21 and include permit conditions that are protective of the
22 environment and public health. The permit may also
23 include conditions that would address concerns raised
24 during the public hearing.

1 So if the construction permit is issued,
2 the Division of Air Quality will then conduct a
3 construction to operation inspection once construction is
4 complete at the facility.

5 Following a successful construction to
6 operation inspection, meaning that the facility has
7 complied with all required permit and regulatory
8 requirements, the company will then be issued the
9 operating permit.

10 And lastly, this is the list of exhibits
11 that the Department would like to have entered into the
12 hearing record.

13 And that concludes the Department's
14 presentation. Thank you.

15 HEARING OFFICER SMITH: Thank you. I did
16 receive the exhibits that were just listed on your
17 PowerPoint presentation and I hereby mark the exhibits as
18 Department's Exhibits 1 through 7. Those exhibits are
19 posted on the hearing webpage as well, for those who
20 would like to review them.

21 (Several documents were marked as DNREC
22 Exhibit Nos. 1-7.)

23 HEARING OFFICER SMITH: Now, at the
24 conclusion of the permits presentation, I am going to

1 introduce Dave Tennett, who is with Noramco, and will be
2 providing a presentation on their behalf. You may begin,
3 Mr. Tennett, when you are ready.

4 MR. TENNETT: Okay. Thank you. Yes. So
5 my name is Dave Tennett. I will be representing Noramco
6 today. I am responsible for maintenance engineering, EHS
7 and IT onsite, and I will be going through our proposed
8 project here tonight.

9 And you can move on to the next slide.

10 I want to go over a high-level executive
11 summary to give you, I guess, some points to the overall
12 project and kind of where Noramco stands with it.

13 So Noramco is requesting a permit to
14 install a new vacuum pump at its 500 Swedes Landing
15 location as part of an emissions control strategy under
16 our Title V permit.

17 Noramco is not asking for any rezoning,
18 land-use modifications or any changes to the limits for
19 the total VOCs and HAPs that its current permit allows.

20 Noramco will not need to expand the
21 footprint of the plant site as a result of the permit, so
22 all modifications are happening within the site, within
23 the production facility.

24 There is no increase or changes to traffic

1 patterns in and around the plant by direct result of this
2 permit request.

3 If the permit is authorized, Noramco will
4 install the vacuum pump, qualify its use before charging
5 any materials, and begin the production of D8/D9
6 intermediates for use in downstream production, which is
7 at our Athens, Georgia site.

8 Noramco's process has been established and
9 used at other sites outside the U.S., so the
10 environmental impact is well characterized.

11 Once validated, Noramco intends to
12 manufacture D8/D9 periodically in batch campaigns
13 throughout the year so, as was mentioned previously, it's
14 not a continuous process.

15 And you can move on to the next slide,
16 please.

17 So as an overview, Noramco at a glance, so
18 global provider of active ingredients for regulated
19 prescription therapies only. We only manufacture the
20 active pharmaceutical ingredient, so we cannot make any
21 finished drug products. So that means tablets, capsules,
22 liquids, et cetera.

23 The company started roughly 44 years ago
24 by Johnson & Johnson, predominantly to make ingredients

1 for Tylenol. We currently employ about 190 employees
2 and contractors in our Delaware location, and another 40
3 in our Athens, Georgia site.

4 High-level experience. Our products are
5 used in more than 350 pharmaceuticals sold in 30-plus
6 countries. We are a strategic supplier to top-10 brand
7 and generic pharmaceutical companies. Our products are
8 used to treat a variety of indications, including ADHD,
9 pain, addiction treatment, opioid overdose and nausea.

10 And from a regulatory perspective, we are
11 inspected by numerous agencies. So on the quality side,
12 FDA, EMEA, UK MHRA, Health Canada, and then on the safety
13 side OSHA, and then from a DEA perspective for the
14 control substances, they also oversee our site. And we
15 made the top security standards required by these
16 agencies.

17 Move on to the next slide, please.

18 So specifically here in Wilmington, this
19 is our headquarters, this is our main manufacturing site.
20 Again, 190 skilled professionals onsite. We do run 24/7.
21 We are continuously staffed, that's including security as
22 well.

23 Capabilities. We are GMP chemical
24 processing. We are also a DEA licensed manufacturing

1 site. We have secured storage. We have in-house R&D
2 capabilities. We do produce at commercial scale. And a
3 lot of drying technologies, milling technologies that
4 support our processes here.

5 And again, a high level profile of a
6 regulatory environment that we are in. Again, from a
7 health side, FDA, EDQM, DEA, EPA, OSHA, Health Canada,
8 Homeland Security, various agencies that we report to
9 from an inspection perspective.

10 We have an industry leading technical
11 support API characterization. We recently had our 2022
12 FDA inspection, no observations. And we have routine
13 customer drug approvals with no FDA comments either.

14 And just from a rough perspective of our
15 size, we are about 81,000 square feet, 30 minutes from
16 Philadelphia, and we are right on the river and in
17 between the Amtrak rail.

18 Move to the next slide, please.

19 A little bit about, I guess, the reason we
20 are bringing this here. So Noramco is on-shoring
21 production to support US manufacturing. And this is more
22 than just our initiative, this is a Biden-Harris
23 Administration directive to revitalize American
24 manufacturing and secure critical supply chains.

1 Key recommendation from the experts:
2 On-shore production. This is going to ensure the most
3 reliable supply for U.S. patients. Post COVID, global
4 logistics have become more costly and unreliable.

5 So, as a priority project, we are
6 on-shoring production of the intermediates (D8/D9) for
7 the brand name Marinol. And the key indications and
8 usage for this product is anorexia associated with weight
9 loss in patients with AIDS, and nausea and vomiting
10 associated with cancer chemotherapy in patients who have
11 failed to respond to conventional treatments.

12 You can move on the next slide.

13 So high level bar graph here. As
14 explained a little bit earlier in DNREC's presentation,
15 but from a visual. Again, our EPA Title V limit 20.1
16 tons per year VOCs. Our actual 2022 was at 1.4, just
17 under 1.5. And D8/D9 itself will specifically contribute
18 another 0.5 tons.

19 So right now we are currently emitting
20 less than 7 percent of our total allowance of VOCs.
21 Adding D8/D9 in will put us right around 10 percent. And
22 to put that in perspective, the D8/D9 process is roughly
23 equivalent to three cars driving 12,000 miles a year with
24 carbon equivalent.

1 Move on to the next slide.

2 Very brief overview of the project itself.

3 So the bottom part of the slide, two pictures at the
4 bottom level, is the new vacuum pump itself. Bottom
5 right is where it's going to go in our facility here in
6 Wilmington. From a scope overview, we are installing new
7 process transfer piping, instrumentation and associated
8 safety controls, automation. Rough cost about \$1.4
9 million for this project.

10 And the other major piece of the scope is
11 the new vacuum pump and associated automation safety
12 controls, and this is supporting various vacuum
13 distillation steps in the D8/D9 process.

14 From a schedule perspective: Non-permit
15 required construction started in August. We plan to
16 complete that in December 2023. And currently the permit
17 required construction is on hold until this air permit is
18 approved by DNREC. So, which is mainly the vacuum skid,
19 and the desired completion of that would be January of
20 2024 to keep us, to keep production on schedule.

21 Move to the next slide.

22 So this was also touched on, but also I
23 just wanted to just reiterate this. The far right
24 column, we just wanted to show that per DNREC standards,

1 health standards, anything in that right column that
2 would be above 100 percent would be considered unhealthy.
3 So as you can see all the emissions from this process
4 really are well below 1 percent, with the one outlier of
5 methanol, which is 5 percent, which is still well below
6 the health-base standard that DNREC is following.

7 And lastly -- you can go to my last slide.

8 I just wanted to highlight some community
9 involvement, economic contribution that we provide to the
10 local area and the city. So Wilmington payroll and
11 related taxes are roughly 20 million a year, City of
12 Wilmington property taxes, we pay over 100,000 a year.

13 And Noramco Wilmington purchases over 5
14 million in goods and services in Delaware and the
15 surrounding states each year.

16 And the Wilmington site has contributed
17 over \$100,000 annually to local charities and community
18 organizations through monetary contributions, supplies,
19 services, and volunteerism.

20 And we will not go through every single
21 one of these, but you can see these in the presentation.

22 So in active cleanup, Christina River
23 Cleanup, Kalmar Nyckel Foundation, Toys for Tots, all the
24 local first responders, police, fire, local emergency

1 planning, and then also United Way is another big one.

2 So, with that, that is Noramco's
3 presentation for the evening.

4 HEARING OFFICER SMITH: Thank you,
5 Mr. Tennett.

6 The visual presentation that you just went
7 through, we did receive that electronically and I will
8 mark that as Applicant's Exhibit 1. And that is also
9 available on the hearing webpage for any of those who
10 would like to review that again.

11 (A document was marked as Applicant's
12 Exhibit No. 1 for identification.)

13 HEARING EXAMINER SMITH: I want to thank
14 you both for your presentations tonight.

15 We will now turn to the public comment
16 portion of tonight's hearing. Those who had
17 preregistered by noon today with DNREC to offer live
18 comment for inclusion into the hearing record will be
19 called upon in order that their registration was
20 received.

21 First to provide their comment will be
22 George X; second, Joseph M. Walls; third, Donald Farrell;
23 fourth, Willie Scott, and lastly will be Davon Hall.

24 At the time your name is called, you will

1 be unmuted. If for any reason you are having technical
2 issues or miss your name being called, we will call your
3 name twice and move on to the next speaker.

4 We encourage you to submit your comment in
5 writing if you are not able to provide your verbal
6 comment in full tonight.

7 Before we begin, I want to stress the
8 following parameters: Comment must be related to the
9 subject mater of tonight's hearing. Each registrant will
10 be given three minutes to offer their comments for the
11 record. The timer will begin when the commenter starts
12 talking and the system will automatically mute the
13 commenter at the three-minute mark.

14 The commenter's video will remain off
15 while speaking.

16 There is no sharing or yielding of the
17 commenter's three minutes, if the same comment has
18 already been offered instead of saying something
19 different with respect to the three minutes of the time
20 you have.

21 Though, the Department appreciates all
22 comments received, there will be a zero-tolerance policy
23 in effect for disruptive behavior, disparaging remarks,
24 offensive language or personal attacks.

1 Should comments start to fall into such
2 unfortunate and negative categories, I will interrupt the
3 commenter with a warning once. If a disrespectful tone
4 continues, the commenter will be muted immediately and
5 removed from the meeting, regardless of how much time
6 they have left.

7 This is a formal, legal proceeding and, as
8 such, it must be given the respect by all attendees this
9 evening.

10 With that said, may I have Mr. George X
11 unmuted. Please state your name and the organization, if
12 you are representing one, for the record, and you may
13 begin your comments.

14 GEORGE X: Yes. My name is George X. I
15 represent Clean & Fresh Environmental Services, Inc. I
16 am a native of Delaware; Wilmington, Delaware, in
17 particular. I am a native of the Wilmington Eastside.

18 What I would like to enter into the
19 record, I would like to thank Noramco for their generous
20 contributions, but one contributor that should have been
21 donated to is the people who live within a matter of
22 blocks from the factory. They are not included in the
23 list of attendance or attention being given to.

24 Another concern, so we're living very

1 close to an underserved community. And I notice that
2 there is a Legislative bill pending before Delaware's
3 General Assembly to try to correct the problems that
4 DNREC is having in communicating with the community. And
5 that bill is now in the House pending decision. But the
6 hearing that we had on October 24th was a mockery. I
7 could hardly hear any one thing that anyone said because
8 of the acoustics.

9 That said, the reports submitted by
10 Governor Carney over the past 16 months during COVID, and
11 along with his supporters, did reveal the fragileness of
12 the health of the people in Eastside, and in Wilmington
13 in particular. That factor has not been fully studied
14 and entered into the record so that EPA and DNREC could
15 adjust their standards so that the public's health is
16 protected.

17 I understand that the laws allow for this
18 thing to move forward on procedural grounds, but when you
19 talk about the public's health, now you have got to
20 consider the Constitution's 14th Amendment. People's
21 right to good health.

22 And DNREC has declared responsibility in
23 the emissions statement to look out for the public's
24 health. The health of the people is unknown right now.

1 We have learned a lot about the impact of novel
2 coronavirus has impacted gravely on the health, the life
3 of the people, and many have lost their lives. We do not
4 want Noramco to move forward for advancement and increase
5 of more chemicals when we don't know the impact of what
6 they are currently making and the impact that it's having
7 on the health, particularly the respiratory system, of so
8 many.

9 Now, the EPA has chose to hold onto the
10 standard because the new standard as composed offers,
11 according to their decision, less protection. So they
12 held on to the standard that they held up in 2015. We
13 think that DNREC can do better by the community and save
14 lives. Thank you.

15 HEARING OFFICER SMITH: Thank you,
16 Mr. George X.

17 Next can we have Joseph Walls unmuted.

18 Joseph, you may begin. Please state your
19 name and the organization, if you are representing one.

20 MR. WALLS: Yes, ma'am. Thank you. My
21 name is Joseph Walls. I am the CEO of Veteran Services.
22 We are a lobbying organization that is concerned with the
23 health and well-being of all veterans, especially those
24 that are in prison.

1 Our concern in this matter is there are
2 33,000 veterans in New Castle County or thousands of
3 veterans that live downwind from Noramco. And anybody in
4 the medical profession is aware of the recent controversy
5 about the burn pits the veterans had to, or were exposed
6 to in war zones. They shouldn't have to come home and be
7 exposed to the burn pit of Noramco by living downwind
8 from this company.

9 We have to concentrate upon the health of
10 the public. There really aren't any ground studies going
11 on. And you keep talking about modeling studies,
12 modeling studies. Modeling studies, you don't say that
13 you go out and actually take soil samples and samples off
14 of people's roofs to see what's coming to them through
15 the air.

16 When you talk about these pollution
17 limits, when they had the hearing before, Noramco was
18 pointing out how they are only putting out about 20
19 percent of their allowable limit to pollute. They stood
20 there in public and admitted that they are polluting
21 people's neighborhoods with hazardous chemicals. And now
22 they want to increase it? They are already polluting the
23 place. Now they want to further pollute it.

24 We really have to take people's public

1 health seriously. We also got to question about this D8
2 and D9. What are these chemicals? After Mr. Tennett's
3 testimony today, it would appear to me that these are
4 cannabinols, products of marijuana, because of their --
5 what they are intended to treat. They are intended to
6 induce the munchies in people. And we are going to have
7 plenty here in Wilmington, Delaware, that right now they
8 are under utilizing, they are under utilizing their
9 capacity, but when they ramp that thing up, they are
10 going to dominate the marijuana market.

11 We have to start taking these people
12 seriously. We had the Sackler family and the opioid
13 crisis. We don't need the LE...

14 (The microphone was cut off.)

15 HEARING OFFICER SMITH: Mr. Walls, if you
16 could, please submit the remaining portion of your
17 comment in writing. And I thank you for your verbal
18 comments.

19 We will now move on to Mr. Donald Farrell.
20 May I have Mr. Farrell unmuted. And you may begin by
21 stating your first and last name and the organization you
22 are with.

23 Mr. Farrell?

24 MR. FARRELL: Yes. Okay. My name is

1 Donald Farrell, and I live on the Eastside of Wilmington.

2 So after researching and reading the
3 patents and the products, I have a better understanding
4 of the what and why, but not the who. So I have
5 concerns, and I am ready to respond.

6 So I have no issue with the products, the
7 nabinol (sic) and I believe it's nabinine (sic) and the
8 other CBDs that are being investigated and developed for
9 an emerging and potentially lucrative market to treat
10 epilepsy, diabetes, ADHD and to help HIV and cancer
11 patients.

12 So, as I was reading, I had wondered, why
13 mess with Mother Nature? And why try to synthesize and
14 mimic the effects of the plant, when the plant kind of
15 induces munchies and it promotes sleep, and it, you know,
16 the mood elevates. And it also helps to alleviate the
17 downsides of chemotherapy.

18 So I understand why synthesizing and
19 isolating the ingredient is safer for cancer and HIV
20 patients.

21 Now, the who. If Purisys was once a
22 subsidiary of Noramco but became the standalone entity in
23 October of 2019 when the legal separation was finalized
24 during the fourth quarter of 2019, how come none of the

1 documents list Purisys?

2 And my next concern is was there ever a
3 Tier II emergency planning and community right-to-know
4 form that was filled out to provide the public, and the
5 emergency responders and especially folks that live in
6 fenceline communities with information on potential
7 hazards.

8 So I appreciate the confidentiality
9 concerns about the process. However, what about the
10 community's right to know? The public meeting did not
11 meet those requirements.

12 And as far as confidential...

13 (The microphone was cut off.)

14 HEARING OFFICER SMITH: Thank you,
15 Mr. Farrell, for your comment. And, again, if you could
16 please submit your remaining portion of the comment in
17 writing.

18 May I have Mr. Willie Scott unmuted. And
19 please state your name for the record and if you are
20 representing an organization.

21 MR. SCOTT: Yes, thank you. Willie Scott.
22 I do represent the Delaware Sierra Club, and I live in
23 Wilmington, Delaware.

24 A lot has been said about the relatively

1 low levels of VOC emissions from Dole's expansion.
2 However, the Noramco facility is also permitted to emit
3 3,400 tons of carbon dioxide and 2.4 tons of carbon
4 monoxide. So there are emissions beyond just the VOCs
5 and the HAPs that we have been talking about in this
6 permit application that I think are also worthy of
7 consideration.

8 We know what carbon dioxide does in terms
9 of the creation of ground level ozone. There has been a
10 lot of public information around the associated health
11 effects from ground level ozone, which is particularly
12 important given that New Castle County is still rated as
13 marginal on ozone by the EPA.

14 We also know the effect that climate
15 change has on areas already prone to flooding. And I
16 think Southbridge is one of those communities that has to
17 deal with that on an ongoing basis. So these are
18 relevant concerns and issues as it relates to the
19 non-hazardous and non-VOCs that are being emitted. And I
20 think everyone understands that carbon monoxide is just
21 not good for you. So another couple of tons of carbon
22 monoxide in the atmosphere is just not a healthy thing.

23 So given that Noramco is nestled between
24 some vulnerable communities already, DNREC should require

1 the following conditions if the permit is approved:

2 No. 1: Noramco should establish a plan to
3 reduce their overall emissions over time, and that would
4 include CO2 and CO. And this should be a process that
5 Noramco can sit back and think about how they can do a
6 better job of curbing and controlling their emissions
7 going into the future. This, again, would be a longer
8 range plan.

9 Noramco should also improve their
10 relationship with surrounding communities by establishing
11 a community advisory panel to improve two-way
12 communications, and by making the communities aware of
13 emergency protocols so, should there be an event at the
14 plant, how the surrounding communities would be alerted
15 and notified as to what safety measures should they take
16 should such an incident occur.

17 So while Noramco leadership I think in the
18 community meeting indicated some willingness to improve
19 community relations, these elements should be codified as
20 conditions of any permit if, in fact, a permit is
21 approved, to make sure that those things happen.

22 So I would encourage DNREC to seriously
23 consider how it might serve to provide greater protection
24 for the affected communities associated with this permit

1 application by applying the conditions I described above.

2 Thank you.

3 HEARING OFFICER SMITH: Thank you,
4 Mr. Scott.

5 Lastly, may I have Mr. Davon Hall unmuted.
6 And you may begin by stating your first and last name and
7 the organization you are representing, if so.

8 Mr. Hall, you are breaking up.

9 MR. HALL: This is Davon Marque Hall. Can
10 you guys hear me?

11 HEARING OFFICER SMITH: We can hear you
12 now. Whatever zone you may be, you are getting the
13 greatest reception. If at any moment we can't hear you,
14 I will stop and let you know. You may proceed.

15 MR. HALL: I will definitely be submitting
16 this in writing.

17 HEARING OFFICER SMITH: Okay.

18 MR. HALL: I am not a lawyer or a doctor
19 or a scientist, but everything I am -- everything I am
20 not, has made me everything I am. Interacting with
21 people is not easy for all personality types. It's
22 certainly not easy for all business types.

23 But dangerous businesses making dangerous
24 products have beginning to take hold of the communities

1 they inhabit. Corporate crime benefits executives, white
2 collar investors, and state corporate crimes control
3 fraud, transnational global drug trade, and toxic harm in
4 communities of interest, with local aggression or menace,
5 and general treatment or even mayhem stemming from crime,
6 morbidity or infection in unsecured, unstable, unsafe
7 state environments like prisons where overly imprisoned,
8 impoverished neighborhoods some might just call the hood
9 without the neighbor.

10 Possession and ownership rights. Leaving
11 a book at a cafe and a person just picking it up, does
12 not make him or her the owner of that book. There's a
13 term that I learned from a law course: bailment. Like I
14 said, I'm not a lawyer, but bailment is like an overnight
15 test drive, if you take a car out for overnight to look
16 at it to see what it's driving like, or it's like a
17 library book, or staying in a house you are not on the
18 lease of while it's being cleaned out by the owner. This
19 is a bailment.

20 Noramco pays taxes where they are
21 apparently, but this is our community. Yes, it's our
22 lives and limbs are put on the line when these products
23 are made. The manufacture of these dangerous products
24 must be reasonable under duty to make it carefully,

1 product versus liability. In MacPherson, the New York
2 Court of Appeals held that a manufacturer owes a duty of
3 reasonable care to third persons even though there exists
4 no contract.

5 The community in this case is the third
6 person. The first and second are Noramco and DNREC.

7 Rylands v. Fletcher, 1968, in a leading
8 decision by the House of Lords, which established a new
9 era of English tort law. They established the rule that
10 once non-natural use of their land, which leads to
11 another's land being damaged as a result of dangerous
12 things emanating from the land, is strictly liable.
13 Intentions upon actions and non-actions themselves are
14 liabilities, strict liabilities. This applies to action
15 and inaction, reasonable and foreseeable harm to
16 neighbors, failure to warn of dangers, (transmission
17 breaking up) award should make plaintiff's whole, if you
18 have ever been whole.

19 You guys have a duty to care. This is a
20 message to the ombudsman a/k/a the Environmental Justice
21 Director, if this permit passes, we will go sue you.

22 HEARING OFFICER SMITH: Thank you,
23 Mr. Hall, for your comment.

24 That now concludes the public comment

1 portion of tonight's hearing.

2 I want to thank you all for attending
3 tonight. As previously mentioned, the court reporter's
4 transcript will be posted on the hearing webpage
5 dedicated to this matter as soon as it is received.

6 All written comments received between now
7 and November 22nd will be posted on the hearing webpage
8 so that everyone can see the hearing record as it is
9 generated.

10 As we conclude tonight's hearing, I want
11 to remind everyone of the ways to offer comment into
12 inclusion into the formal hearing record. Comments may
13 be submitted through a comment form link on the hearing
14 webpage via email to DNREChearingcomments@Delaware.gov or
15 via U.S. Postal Service at the physical address for DNREC
16 indicated on the hearing webpage, or on the public
17 notices previously issued in this matter.

18 Written comments to DNREC may not be
19 submitted using social media platforms such as Twitter,
20 Facebook, YouTube or text messaging. Please remember
21 that all comments, regardless of how fast it is received,
22 as long as it is received by the Department on or before
23 November 22nd, 2023 will bear the exact same weight and
24 will be considered equally by the Secretary prior to

1 making his final decision in this matter.

2 The ultimate decision regarding this
3 matter is made by DNREC's Secretary Garvin. This formal
4 proceeding tonight acts as a mechanism to enable the
5 Department to thoroughly vet the application to the
6 public, and to let the public know the various ways in
7 which comment may be submitted for Secretary Garvin's
8 consideration, if so desired.

9 The hearing is now adjourned at 6:50 p.m.
10 Thank you all for joining.

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C E R T I F I C A T E

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I do hereby certify that the foregoing hearing was taken remotely via Zoom, pursuant to notice, at the time indicated; that the statements of participants were correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the transcript is a true record of the statements made by the participants; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.

WITNESS my hand and official seal this 11th day of November A.D. 2023.



Notary Public

&	1968 38:7	3	93 13:21
& 19:24 27:15	19801 1:22	3 3:7	95 13:23
0	1st 11:22 12:3	3,400 34:3	a
0.22 14:2	2	30 20:5 21:15	a.d. 41:15
0.5 14:1 22:18	2 3:5,6	300 1:21	ability 4:18
0018 1:3	2.4 34:3	302-571-0510	able 5:13 11:14
1	2.6 13:14	1:22	14:8,12 26:5
1 3:4,12,17	20 3:10 24:11	33,000 30:2	above 12:21
15:7,13,16	30:18	350 20:5	15:12 24:2
17:18 24:4	20.1 13:2 22:15	4	36:1
25:8,12 35:2	2015 29:12	4 3:9	abualfaraj 1:15
1-7 17:22	2019 32:23,24	4.9 13:14	10:12,16,17
1.4 22:16 23:8	2021 14:14	40 20:2	accommodated
1.5. 22:17	2022 14:14	44 19:23	9:8
10 20:6 22:21	21:11 22:16	5	account 15:4
10.7 13:3	2023 1:3,10 3:4	5 3:11 24:5,13	accuracy 16:4
100 15:3,7,13	3:6,8,10,12,12	500 12:9 18:14	acoustics 28:8
15:16 24:2	4:6 8:11 9:10	6	action 38:14
100,000 24:12	10:6 12:7	6 3:13	41:12
24:17	23:16 39:23	6:00 1:11	actions 38:13
11th 41:14	41:15	6:01 4:6	38:13
12 13:2	2024 23:20	6:50 40:9	active 12:11
12,000 22:23	20th 11:18	7	19:18,20 24:22
1208 41:16	22nd 8:11 9:10	7 1:10 3:14	acts 40:4
13th 11:8	10:6 12:7 39:7	17:18 22:20	actual 14:9,13
14 3:4	39:23	7th 4:6 12:5	22:16
14th 11:17	24/7 20:20	8	actually 30:13
28:20	24th 12:1 28:6	81,000 21:15	addiction 20:9
15 11:19 12:6	25 3:16 12:24	815 1:21	adding 22:21
16 28:10	13:16	9	addition 11:9
17 3:3	27 3:8,12	9.9 13:4	address 16:23
17th 11:16	2nd 11:21		39:15
190 20:1,20			adhd 20:8
			32:10

adjourned 40:9 adjust 28:15 administration 21:23 administrative 4:14 8:15 15:21 admitted 11:5 30:20 adsorption 13:22 advancement 29:4 adverse 15:1 adversely 15:17 advertised 11:17,22 12:2 16:6 advisory 35:11 aerscreen 14:18,18 15:10 affected 35:24 agencies 20:11 20:16 21:8 ages 15:4 aggression 37:4 ago 19:23 aided 41:9 aids 22:9 air 1:15 3:17 6:12 10:12,18 10:22 11:1,5 12:24 13:4 14:17,20 15:19	16:6,17,18 17:2 23:17 30:15 airborne 14:24 alerted 35:14 alleviate 32:16 allow 28:17 allowable 30:19 allowance 22:20 allows 18:19 amended 11:12 amendment 28:20 american 21:23 amtrak 21:17 amy 1:16 analysis 14:18 annual 13:2 annually 24:17 anorexia 12:18 22:8 another's 38:11 anybody 30:3 api 21:11 apparently 37:21 appeals 38:2 appear 31:3 appearances 2:1 applicable 16:8 applicant 3:7	applicant's 3:16 25:8,11 application 1:3 3:4,4,9,13 6:2 7:5,7 9:2 10:23 11:7,9,11,15,17 13:8 15:18,21 16:3,5 34:6 36:1 40:5 applications 8:19 applies 38:14 apply 8:22 15:3 applying 36:1 appointed 6:4 appreciate 33:8 appreciated 7:10 appreciates 26:21 approvals 21:13 approved 23:18 35:1,21 approves 16:16 approximately 1:11 april 11:8 area 24:10 areas 34:15 asking 18:17 assembly 28:3 assigned 10:19 assist 4:15 7:22	associated 10:24 14:5 15:12 22:8,10 23:7,11 34:10 35:24 athens 19:7 20:3 atlantic 1:21 atmosphere 34:22 attacks 26:24 attendance 27:23 attendees 27:8 attending 8:14 39:2 attention 27:23 aug 3:4,10 august 11:17 11:18 23:15 authentic 9:11 authorized 19:3 automatically 5:16 26:12 automation 23:8,11 available 4:10 25:9 avenue 1:21 award 38:17 aware 4:18 30:4 35:12
---	---	--	---

b	23:4	cancer 12:18	certified 3:7
b 3:1	brand 20:6	22:10 32:10,19	certify 41:4
back 5:18 35:5	22:7	cannabinols	cetera 19:22
bailment 37:13	breaking 36:8	31:4	chains 21:24
37:14,19	38:17	capabilities	change 34:15
bar 22:13	brief 23:2	20:23 21:2	changes 18:18
base 24:6	bring 5:1	capacity 31:9	18:24
based 14:8	bringing 21:20	capsules 19:21	characterizati...
15:14	brings 12:4	caption 4:21,22	21:11
basis 16:12	build 7:4 9:16	4:24 5:6	characterized
34:17	burn 30:5,7	captioning 4:9	19:10
batch 12:8	business 36:22	4:19,20	charging 19:4
19:12	businesses	captions 5:15	charities 24:17
batches 14:8,10	36:23	5:17,17	chat 7:3
bear 39:23	busy 4:5	car 37:15	chemical 20:23
beginning 1:11	button 4:22,22	carbon 13:22	chemicals 29:5
36:24	4:24 5:6	22:24 34:3,3,8	30:21 31:2
behalf 10:13,21	c	34:20,21	chemotherapy
18:2	c 41:1,1	care 38:3,19	22:10 32:17
behavior 26:23	cabinet 6:3	carefully 37:24	chose 29:9
believe 4:2 32:7	cafe 37:11	caret 5:1	christina 24:22
benefits 37:1	calculate 14:19	carney 28:10	city 24:10,11
better 29:13	calculated	carry 7:14	clean 27:15
32:3 35:6	13:12	cars 22:23	cleaned 37:18
beyond 34:4	calculates 14:7	case 38:5	cleanup 24:22
biden 21:22	calculations	castle 12:24	24:23
big 25:1	16:4	30:2 34:12	click 4:24
bill 28:2,5	calendar 3:12	categories 27:2	climate 34:14
bit 21:19 22:14	call 26:2 37:8	caustic 13:20	close 4:9 12:6
blocks 27:22	called 25:19,24	cbds 32:8	16:15 28:1
body 15:5	26:2	cc 5:7	closed 4:19,20
book 37:11,12	campaigns	ceo 29:21	closes 8:11
37:17	19:12	certain 14:11	club 33:22
bottom 4:21	canada 20:12	certainly 36:22	co2 35:4
5:5,8,11 23:3,4	21:7		

coastal 15:24 16:1 codified 35:19 collar 37:2 column 15:11 23:24 24:1 combined 13:3 13:13 come 30:6 32:24 comes 5:10 coming 30:14 comment 6:16 7:7,10,13,14 8:5,6,13,23 9:7 9:9 10:5 12:5 16:16 25:15,18 25:21 26:4,6,8 26:17 31:17 33:15,16 38:23 38:24 39:11,13 40:7 commenter 8:4 26:11,13 27:3 27:4 commenter's 26:14,17 comments 7:8 7:10,12,13,16 7:23,24 8:2,7,8 9:2,18 10:8 21:13 26:10,22 27:1,13 31:18 39:6,12,18,21	commercial 21:2 communicating 28:4 communicati... 35:12 communities 33:6 34:16,24 35:10,12,14,24 36:24 37:4 community 11:24 24:8,17 28:1,4 29:13 33:3 35:11,18 35:19 37:21 38:5 community's 33:10 companies 20:7 company 17:8 19:23 30:8 compare 14:22 complete 17:4 23:16 completeness 15:22 completion 23:19 compliance 10:19 complied 17:7 composed 29:10 compounds 12:23	computer 4:20 41:9 concentrate 30:9 concentration 14:21,24 concern 27:24 30:1 33:2 concerned 29:22 concerning 8:16 concerns 16:23 32:5 33:9 34:18 conclude 8:14 39:10 concludes 17:13 38:24 conclusion 6:10 6:15 10:10 17:24 conditions 15:4 16:21,23 35:1 35:20 36:1 conduct 6:1 16:6,7 17:2 conducted 6:7 14:17 confidential 33:12 confidentiality 3:4 33:8 confirm 16:3	connected 4:2 consider 28:20 35:23 consideration 9:7 10:8 12:21 34:7 40:8 considered 7:19 24:2 39:24 consisting 9:17 constitution's 28:20 constraints 14:11 construction 1:3 6:2 9:1 11:8 12:13 16:18 17:1,3,3 17:5 23:15,17 contain 9:23 continues 27:4 continuous 19:14 continuously 20:21 contract 38:4 contractors 20:2 contribute 22:17 contributed 24:16 contribution 24:9
---	--	---	--

<p>contributions 24:18 27:20</p> <p>contributor 27:20</p> <p>control 5:24 12:21 13:12,19 13:20 18:15 20:14 37:2</p> <p>controlled 13:24 14:4</p> <p>controlling 35:6</p> <p>controls 23:8 23:12</p> <p>controversy 30:4</p> <p>conventional 22:11</p> <p>corbett 1:9</p> <p>corner 5:15</p> <p>coronavirus 29:2</p> <p>corporate 37:1 37:2</p> <p>correct 28:3</p> <p>correctly 41:7</p> <p>cost 23:8</p> <p>costly 22:4</p> <p>counsel 41:11</p> <p>countries 20:6</p> <p>county 12:24 30:2 34:12</p> <p>couple 34:21</p> <p>course 37:13</p>	<p>court 6:17 9:12 38:2 39:3</p> <p>covid 22:3 28:10</p> <p>creation 34:9</p> <p>crime 37:1,5</p> <p>crimes 37:2</p> <p>crisis 31:13</p> <p>criteria 15:6,15</p> <p>critical 21:24</p> <p>curbing 35:6</p> <p>current 18:19</p> <p>currently 20:1 22:19 23:16 29:6</p> <p>customer 21:13</p> <p>cut 31:14 33:13</p>	<p>days 11:19 12:6</p> <p>de 1:22</p> <p>dea 20:13,24 21:7</p> <p>deal 34:17</p> <p>december 23:16</p> <p>decision 7:20 9:23 10:2,3 28:5 29:11 38:8 40:1,2</p> <p>declared 28:22</p> <p>dedicated 6:20 8:20 9:5 39:5</p> <p>definitely 36:15</p> <p>delaware 1:10 1:21 3:9,11 11:18,23 12:10 20:2 24:14 27:16,16 31:7 33:22,23</p> <p>delaware's 5:23 28:2</p> <p>delaware.gov 39:14</p> <p>department 5:23 6:8 7:19 7:21 10:2,14 11:20,24 17:11 26:21 39:22 40:5</p> <p>department's 4:8 6:11 8:20 15:5 17:13,18</p>	<p>described 36:1</p> <p>desired 23:19 40:8</p> <p>destruction 13:21,23</p> <p>detailed 16:20</p> <p>details 8:12,16</p> <p>determine 15:24 16:8</p> <p>developed 32:8</p> <p>devices 12:21 13:12,19,20</p> <p>diabetes 32:10</p> <p>different 15:4 26:19</p> <p>dioxide 34:3,8</p> <p>direct 19:1</p> <p>directed 13:19</p> <p>directive 21:23</p> <p>directly 7:17,24</p> <p>director 38:21</p> <p>disparaging 26:23</p> <p>disperse 14:20</p> <p>dispersion 14:18 15:10 16:6</p> <p>disrespectful 27:3</p> <p>disruptive 26:23</p> <p>distillation 23:13</p> <p>division 1:15 6:11 10:11,18</p>
	<p>d</p>		
	<p>d8 3:4 19:5,12 22:6,17,21,22 23:13 31:1</p> <p>d9 3:4 19:5,12 22:6,17,21,22 23:13 31:2</p> <p>damaged 38:11</p> <p>dangerous 36:23,23 37:23 38:11</p> <p>dangers 38:16</p> <p>dave 1:16 18:1 18:5</p> <p>davon 2:5 3:5,7 25:23 36:5,9</p> <p>day 41:14</p>		

<p>10:21 11:1,4 14:17 15:19 16:17 17:2 dnrec 1:1,13,14 1:15,16 3:3,10 3:11,14 7:17 7:24 8:1,7,23 17:21 23:18,24 24:6 25:17 28:4,14,22 29:13 34:24 35:22 38:6 39:15,18 dnrec's 6:6 8:15 10:18 15:15 22:14 40:3 dnrehearing... 39:14 docket 1:3 doctor 36:18 document 25:11 documents 8:19 17:21 33:1 dole's 34:1 dominate 31:10 donald 2:4 25:22 31:19 32:1 donated 27:21 dots 4:23 5:8 downsides 32:17</p>	<p>downstream 19:6 downwind 14:21 30:3,7 draft 16:11 drive 37:15 driving 22:23 37:16 drug 19:21 21:13 37:3 drying 21:3 due 14:11 duty 37:24 38:2 38:19</p> <p style="text-align: center;">e</p> <p>e 3:1 41:1,1 earlier 13:11 22:14 eastside 27:17 28:12 32:1 easy 36:21,22 economic 24:9 edqm 21:7 effect 26:23 34:14 effects 15:1 32:14 34:11 efficiency 13:21,23 ehs 18:6 either 21:13 electronically 25:7 elements 35:19</p>	<p>elevates 32:16 ellen 1:9 email 39:14 emanating 38:12 emea 20:12 emergency 24:24 33:3,5 35:13 emerging 32:9 emission 13:7 14:6 16:4,12 emissions 10:24 12:20 13:2,9,11,13,18 13:24 14:5,7 14:13 18:15 24:3 28:23 34:1,4 35:3,6 emit 34:2 emitted 14:20 34:19 emitting 22:19 employee 20:1 employees 20:1 enable 7:7 40:4 encourage 8:14 26:4 35:22 encouraged 8:6 engineer 10:18 10:20 engineering 10:19 18:6 english 38:9</p>	<p>ensure 9:6 22:2 enter 27:18 entered 7:17 17:11 28:14 entity 32:22 environment 16:22 21:6 environmental 5:24 19:10 27:15 38:20 environments 37:7 epa 21:7 22:15 28:14 29:9 34:13 epilepsy 32:10 equal 8:8 equally 39:24 equipment 11:13 equivalent 22:23,24 era 38:9 especially 29:23 33:5 essentially 14:24 establish 35:2 established 14:23 19:8 38:8,9 establishing 35:10 estimated 14:11</p>
---	---	--	--

estimates 14:21 et 19:22 evening 4:1 5:22 8:2,9,14 10:17,21 25:3 27:9 evening's 12:4 event 7:2 35:13 eventually 9:19 exact 39:23 examiner 4:1 25:13 executive 18:10 executives 37:1 exhibit 3:4,5,7 3:9,11,13,14,16 3:17 17:22 25:8,12 exhibits 3:3 9:18 11:4 17:10,16,17,18 17:18 existing 11:13 13:19 exists 38:3 expand 18:20 expansion 34:1 expected 15:2 experience 20:4 experts 22:1 explained 22:14 exposed 30:5,7 exposure 15:2	<p style="text-align: center;">f</p> f 41:1 facebook 39:20 facility 11:10 11:13 12:9,19 12:20 13:1,7 13:20 14:13 16:1 17:4,6 18:23 23:5 34:2 fact 3:13 35:20 factor 15:3 28:13 factory 27:22 failed 22:11 failure 38:16 fall 27:1 family 31:12 far 23:23 33:12 farrell 2:4 25:22 31:19,20 31:23,24 32:1 33:15 fast 39:21 fda 20:12 21:7 21:12,13 feature 4:10 federal 16:8,19 feet 21:15 fenceline 33:6 filled 33:4 final 40:1 finalized 32:23 finally 11:3	find 4:24 8:16 finish 8:5 finished 19:21 fire 24:24 first 6:23 8:23 15:20 24:24 25:21 31:21 36:6 38:6 fletcher 38:7 flooding 34:15 folks 33:5 following 6:15 8:22 9:9,22 16:15 17:5 24:6 26:8 35:1 footprint 18:21 foregoing 41:4 foremost 6:24 foreseeable 38:15 form 7:15 33:4 39:13 formal 4:3 6:1 6:5,24 7:5,18 9:12 27:7 39:12 40:3 forward 28:18 29:4 foundation 24:23 fourth 25:23 32:24 fragileness 28:11	fraud 37:3 fresh 27:15 full 8:7 26:6 fully 28:13 further 6:22 11:16 30:23 future 35:7 <p style="text-align: center;">g</p> garvin 6:4 9:20 40:3 garvin's 40:7 gear 5:10 genders 15:4 general 11:2 28:3 37:5 generate 6:7 generated 39:9 generic 20:7 generous 27:19 george 2:3 25:22 27:10,14 27:14 29:16 georgia 19:7 20:3 getting 36:12 give 18:11 given 7:9 8:4 14:24 26:10 27:8,23 34:12 34:23 glance 19:17 global 19:18 22:3 37:3 gmp 20:23
--	--	---	---

<p>go 4:2,9 6:22 8:15 12:16 14:6 16:14 18:10 23:5 24:7,20 30:13 38:21 going 17:24 18:7 22:2 23:5 30:10 31:6,10 35:7 good 4:1 10:16 28:21 34:21 goods 24:14 governor 28:10 graph 22:13 gravely 29:2 greater 15:6 35:23 greatest 36:13 ground 30:10 34:9,11 grounds 28:18 guess 18:11 21:19 guys 36:10 38:19</p>	<p>hannum 1:9 hap 13:5 happen 35:21 happening 18:22 haps 12:24 13:15,16 14:2 14:4,16 18:19 34:5 harm 37:3 38:15 harris 21:22 hazardous 12:23 13:4 30:21 34:19 hazards 33:7 headquarters 20:19 health 15:1,4,7 15:16 16:22 20:12 21:7,7 24:1,6 28:12 28:15,19,21,24 28:24 29:2,7 29:23 30:9 31:1 34:10</p>	<p>7:18,19 8:9,10 8:15,20,24 9:3 9:4,14,15,18 11:6,21,21 12:3,5,6 16:15 16:24 17:12,15 17:19,23 25:4 25:9,13,16,18 26:9 28:6 29:15 30:17 31:15 33:14 36:3,11,17 38:22 39:1,4,7 39:8,10,12,13 39:16 40:9 41:4 hearings 8:23 held 12:1 29:12 29:12 38:2 hello 4:13 help 32:10 helps 32:16 high 18:10 20:4 21:5 22:13 highlight 24:8 hiv 12:18 32:10 32:19 hold 23:17 29:9 36:24 home 30:6 homeland 21:8 hood 37:8 house 21:1 28:5 37:17 38:8</p>	<p>i icon 5:10 identification 25:12 identify 11:3 ii 33:3 immediately 27:4 impact 19:10 29:1,5,6 impacted 15:17 29:2 important 6:22 10:1 34:12 impoverished 37:8 imprisoned 37:7 improve 35:9 35:11,18 inaction 38:15 incident 35:16 include 11:12 16:21,23 35:4 included 16:3,9 27:22 including 20:8 20:21 inclusion 25:18 39:12 incorporated 9:4 incorporation 6:14</p>
<p>h</p>	<p>healthy 34:22 hear 28:7 36:10 36:13 hearing 1:1,8 1:13 3:5,7,11 3:17 4:1,8,15 5:19,20 6:1,4,6 6:6,8,14,17,20 6:24 7:3,4,12</p>	<p>hearings 8:23 held 12:1 29:12 29:12 38:2 hello 4:13 help 32:10 helps 32:16 high 18:10 20:4 21:5 22:13 highlight 24:8 hiv 12:18 32:10 32:19 hold 23:17 29:9 36:24 home 30:6 homeland 21:8 hood 37:8 house 21:1 28:5 37:17 38:8</p>	<p>i icon 5:10 identification 25:12 identify 11:3 ii 33:3 immediately 27:4 impact 19:10 29:1,5,6 impacted 15:17 29:2 important 6:22 10:1 34:12 impoverished 37:8 imprisoned 37:7 improve 35:9 35:11,18 inaction 38:15 incident 35:16 include 11:12 16:21,23 35:4 included 16:3,9 27:22 including 20:8 20:21 inclusion 25:18 39:12 incorporated 9:4 incorporation 6:14</p>

<p>increase 13:6 18:24 29:4 30:22 indicated 5:6 35:18 39:16 41:6 indications 20:8 22:7 individual 13:5 14:3 induce 31:6 induces 32:15 industry 21:10 infection 37:6 informal 7:1 information 7:1 12:1,2 16:3 16:10 33:6 34:10 ingredient 12:12 19:20 32:19 ingredients 19:18,24 inhabit 37:1 initially 11:7 initiative 21:22 inspected 20:11 inspection 17:3 17:6 21:9,12 install 12:14 18:14 19:4 installation 11:12</p>	<p>installing 23:6 instrumentati... 23:7 intended 31:5,5 intends 19:11 intentions 38:13 interacting 36:20 interest 37:4 interested 41:12 intermediates 12:11 19:6 22:6 interrupt 27:2 introduce 10:11 18:1 introducing 6:11 introductory 6:10 10:10 investigated 32:8 investors 37:2 involvement 24:9 isolating 32:19 issue 9:21 16:17 32:6 issued 15:20 17:1,8 39:17 issues 26:2 34:18</p>	<p style="text-align: center;">j</p> <p>jackson 1:14 4:8,12,13,14 5:21 january 23:19 job 35:6 johnson 19:24 19:24 join 4:5 joining 40:10 joseph 2:4 25:22 29:17,18 29:21 journal 3:9,11 11:19,23 july 11:16 justice 38:20</p> <p style="text-align: center;">k</p> <p>k 38:20 kalmar 24:23 keep 23:20,20 30:11 key 22:1,7 kin 41:11 kind 18:12 32:14 know 29:5 32:15 33:3,10 34:8,14 36:14 40:6</p> <p style="text-align: center;">l</p> <p>land 18:18 38:10,11,12</p>	<p>landing 12:10 18:14 language 5:2,3 5:7,12,14 26:24 languages 4:10 4:19 5:4 lastly 10:1 17:10 24:7 25:23 36:5 law 8:16 37:13 38:9 laws 28:17 lawyer 36:18 37:14 le 31:13 leadership 35:17 leading 21:10 38:7 leads 38:10 learn 7:6 learned 29:1 37:13 lease 37:18 leaving 37:10 left 27:6 legal 1:20 6:24 7:5 16:5 27:7 32:23 legislative 28:2 letters 3:7 7:15 level 18:10 20:4 21:5 22:13 23:4 34:9,11</p>
--	---	---	--

<p>levels 34:1 liabilities 38:14 38:14 liability 38:1 liable 38:12 library 37:17 licensed 20:24 life 29:2 limbs 37:22 limit 14:23 22:15 30:19 limited 7:11 8:24 limits 13:1,7 14:6 16:12,13 18:18 30:17 line 11:10 12:15 37:22 link 39:13 liquids 19:22 list 6:7 11:3 17:10 27:23 33:1 listed 5:3,4,7 17:16 lists 14:3 little 21:19 22:14 live 7:7 8:2,9 25:17 27:21 30:3 32:1 33:5 33:22 lives 29:3,14 37:22</p>	<p>living 27:24 30:7 lobbying 29:22 local 15:24 24:10,17,24,24 37:4 located 5:11 12:9 16:1 location 18:15 20:2 logistics 4:7 22:4 long 15:2 39:22 longer 35:7 look 15:23 28:23 37:15 lords 38:8 loss 22:9 lost 29:3 lot 21:3 29:1 33:24 34:10 low 34:1 lower 14:10 lucrative 32:9</p> <p style="text-align: center;">m</p> <p>m 25:22 ma'am 29:20 machine 41:7 macpherson 38:1 made 10:2,3 20:15 36:20 37:23 40:3 41:10</p>	<p>main 20:19 maintenance 18:6 major 12:22,22 13:16 23:10 make 4:17 12:10 14:4 19:20,24 35:21 37:12,24 38:17 making 29:6 35:12 36:23 40:1 mann 1:16 manufacture 11:10 19:12,19 37:23 manufacturer 38:2 manufacturing 12:9 20:19,24 21:21,24 marginal 34:13 marijuana 31:4 31:10 marinol 22:7 mark 17:17 25:8 26:13 marked 3:3,16 17:21 25:11 market 31:10 32:9 marque 3:5,7 36:9 mater 26:9</p>	<p>materials 3:4 19:5 matter 6:20 7:11,18,20,23 8:17,21,24 9:3 9:5,8,17,23 10:4 27:21 30:1 39:5,17 40:1,3 maximum 14:8 14:21 mayhem 37:5 mdc 14:21,22 15:6,11 meaning 13:11 17:6 means 12:19 19:21 measures 35:15 mechanism 40:4 media 39:19 medical 30:4 medication 12:16 medications 12:12 meet 15:5 33:11 meeting 3:12 5:9 27:5 33:10 35:18 meets 15:15 16:18</p>
--	--	---	---

members 10:7	modifications	36:6	11:7,11 12:8
memorandum	18:18,22	native 27:16,17	12:13,19 13:6
16:11,11	moment 36:13	natural 1:3	14:7,14 18:1,5
menace 37:4	monetary	5:24 6:1 9:1	18:12,13,17,20
mentioned	24:18	38:10	19:3,11,17
13:10,15 19:13	monitoring	nature 32:13	21:20 24:13
39:3	16:13	nausea 20:9	27:19 29:4
merit 1:9	monoxide 34:4	22:9	30:3,7,17
mess 32:13	34:20,22	need 5:16 16:9	32:22 34:2,23
message 38:20	month 13:2	18:20 31:13	35:2,5,9,17
messaging	months 28:10	needs 15:6	37:20 38:6
39:20	mood 32:16	negative 27:2	noramco's 6:12
methanol 24:5	morbidity 37:6	neighbor 37:9	13:1 19:8 25:2
mhra 20:12	mother 32:13	neighborhoods	nos 17:22
microphone	move 18:9	30:21 37:8	notary 41:17
31:14 33:13	19:15 20:17	neighbors	note 7:16 10:1
mid 1:21	21:18 22:12	38:16	notice 1:9 3:9
miles 22:23	23:1,21 26:3	neither 41:11	3:11 12:3 16:5
milling 21:3	28:18 29:4	nestled 34:23	28:1 41:5
million 23:9	31:19	new 11:9,10,12	notices 39:17
24:11,14	multiple 4:10	12:14,14,15,16	notification 3:7
mimic 32:14	4:19 7:12	12:24 18:14	notified 35:15
minor 1:3 6:1	munchies 31:6	23:4,6,11	noura 1:15
9:1	32:15	29:10 30:2	10:12,17
minute 26:13	mute 26:12	34:12 38:1,8	novel 29:1
minutes 8:4,6	muted 27:4	news 3:9,9,11	november 1:10
21:15 26:10,17	n	3:11 11:18,18	4:6 8:11 9:10
26:19	nabinine 32:7	11:23,23	10:6 12:5,7
mockery 28:6	nabinol 32:7	non 23:14	39:7,23 41:15
model 14:20,22	name 4:13 6:3	34:19,19 38:10	number 14:8,9
15:10	10:17 18:5	38:13	numerous
modeling 14:18	22:7 25:24	noon 25:17	20:11
14:19 15:15	26:2,3 27:11	noramco 1:3,16	nyckel 24:23
16:7 30:11,12	27:14 29:19,21	3:7,9,17 6:2	
30:12	31:21,24 33:19	7:5 9:2 10:20	

o	ongoing 34:17 onsite 18:7 20:20 open 9:9 10:6 12:6 operating 16:12 17:9 operation 17:3 17:6 opioid 20:9 opoid 31:12 opportunity 10:7 options 5:2 order 8:3 9:6 9:22,22 15:5,7 25:19 organic 12:23 organization 7:22 27:11 29:19,22 31:21 33:20 36:7 organizations 24:18 osha 20:13 21:7 outcome 41:12 outlier 24:4 outside 7:22 19:9 outweigh 7:13 overall 18:11 35:3 overdose 20:9 overly 37:7	overnight 37:14,15 oversee 20:14 overview 10:22 19:17 23:2,6 owes 38:2 owner 37:12,18 ownership 37:10 ozone 34:9,11 34:13	patents 32:3 patients 12:17 22:3,9,10 32:11,20 patterns 19:1 pay 24:12 payroll 24:10 pays 37:20 pending 10:3 28:2,5 people 27:21 28:12,24 29:3 31:6,11 36:21 people's 28:20 30:14,21,24 percent 13:22 13:23 22:20,21 24:2,4,5 30:19 period 10:5 12:5 16:16 periodically 19:12 permit 1:4 3:4 3:13,17 6:2 7:5 9:2 10:4,23 11:8 12:14 13:1 14:6 15:12,18,20,24 16:9,14,16,18 16:20,21,22 17:1,7,9 18:13 18:16,19,21 19:2,3 23:14 23:16,17 34:6 35:1,20,20,24
		p	
		p 1:3 p.m. 1:11 4:6 40:9 page 3:3,16 5:10 7:19 pain 20:9 panel 35:11 parameters 6:23 26:8 part 7:20 11:5 13:7 18:15 23:3 participants 41:6,10 particular 27:17 28:13 particularly 29:7 34:11 partnered 7:21 party 41:11 passes 38:21 past 28:10	

<p>38:21</p> <p>permits 17:24</p> <p>permitted 7:3 34:2</p> <p>permitting 7:20 8:17 9:16 11:2</p> <p>perry 1:15</p> <p>person 37:11 38:6</p> <p>personal 26:24</p> <p>personality 36:21</p> <p>persons 38:3</p> <p>perspective 20:10,13 21:9 21:14 22:22 23:14</p> <p>pertaining 11:4</p> <p>pertinent 9:2</p> <p>pharmaceutical 12:8,11 19:20 20:7</p> <p>pharmaceutic... 20:5</p> <p>philadelphia 21:16</p> <p>physical 39:15</p> <p>picking 37:11</p> <p>pictures 23:3</p> <p>piece 23:10</p> <p>pipng 23:7</p> <p>pit 30:7</p> <p>pits 30:5</p>	<p>place 15:20 30:23</p> <p>plaintiff's 38:17</p> <p>plan 23:15 35:2 35:8</p> <p>planning 25:1 33:3</p> <p>plant 18:21 19:1 32:14,14 35:14</p> <p>platform 4:11 4:18 5:23 7:6</p> <p>platforms 39:19</p> <p>please 4:12 19:16 20:17 21:18 27:11 29:18 31:16 33:16,19 39:20</p> <p>plenty 31:7</p> <p>plus 20:5</p> <p>pointing 5:1 30:18</p> <p>points 18:11</p> <p>police 24:24</p> <p>policy 26:22</p> <p>pollutant 14:5 14:19,22 15:1</p> <p>pollutants 12:24 13:4 15:12</p> <p>pollute 30:19 30:23</p>	<p>polluting 30:20 30:22</p> <p>pollution 30:16</p> <p>popping 5:16</p> <p>portion 6:17 8:13 25:16 31:16 33:16 39:1</p> <p>possession 37:10</p> <p>post 22:3</p> <p>postal 39:15</p> <p>posted 6:19 7:18 8:20 9:4 9:14 17:19 39:4,7</p> <p>potential 12:20 13:9 14:7 33:6</p> <p>potentially 32:9</p> <p>powerpoint 17:17</p> <p>predominantly 19:24</p> <p>preferred 5:2,3 5:7,14</p> <p>preparing 6:18</p> <p>preregistered 8:1 25:17</p> <p>preregistration 8:3</p> <p>prescribed 12:17</p> <p>prescription 19:19</p>	<p>present 1:12 6:8,18</p> <p>presentation 3:14,17 10:13 17:14,17,24 18:2 22:14 24:21 25:3,6</p> <p>presentations 6:13,16 8:13 8:18 25:14</p> <p>presenting 10:22</p> <p>presumed 15:17</p> <p>previous 13:15</p> <p>previously 19:13 39:3,17</p> <p>prior 39:24</p> <p>priority 22:5</p> <p>prison 29:24</p> <p>prisons 37:7</p> <p>problems 28:3</p> <p>procedural 28:18</p> <p>proceed 4:12 36:14</p> <p>proceeding 4:3 6:5,23 8:13 9:10,12 27:7 40:4</p> <p>process 7:20 9:22 11:2 13:9 13:18 14:1 15:15,19 19:8 19:14 22:22</p>
--	---	--	--

<p>23:7,13 24:3 33:9 35:4 processes 13:13 14:11 21:4 processing 20:24 produce 14:9 14:10 21:2 product 22:8 38:1 production 11:10 12:15 18:23 19:5,6 21:21 22:2,6 23:20 products 11:11 12:15,16 19:21 20:4,7 31:4 32:3,6 36:24 37:22,23 profession 30:4 professional 10:12 professionals 20:20 profile 21:5 project 10:20 10:24 11:4,14 18:8,12 22:5 23:2,9 promotes 32:15 prone 34:15 proof 15:23 property 24:12</p>	<p>proposed 7:6 11:14 13:18 18:7 protected 28:16 protection 29:11 35:23 protective 15:7 16:21 protocols 6:6 8:22 35:13 provide 5:22 6:13 8:4,12 10:13,23 11:1 24:9 25:21 26:5 33:4 35:23 provided 7:8,9 provider 19:18 providing 7:5 18:2 public 1:1 2:2 3:5,7,9,11,11 3:12,17 6:1,16 7:1,6,7,23 8:23 9:9 10:5,7 11:21,21 12:3 12:4,5 15:7,16 16:15,22,24 25:15 30:10,20 30:24 33:4,10 34:10 38:24 39:16 40:6,6 41:17</p>	<p>public's 28:15 28:19,23 pump 11:13 12:14 18:14 19:4 23:4,11 purchases 24:13 purisys 32:21 33:1 purpose 7:3 9:15 pursuant 1:8 6:5 41:5 put 7:13 22:21 22:22 37:22 putting 30:18</p> <p style="text-align: center;">q</p> <p>qualify 19:4 quality 1:15 6:12 10:18,22 11:5 14:17 15:19 16:17,18 17:2 20:11 quality's 10:12 11:1 quarter 32:24 question 31:1</p> <p style="text-align: center;">r</p> <p>r 41:1 r&d 21:1 rail 21:17 raised 16:23 ramp 31:9</p>	<p>range 35:8 rated 34:12 ratio 15:6,11 reading 32:2,12 ready 4:2 10:15 18:3 32:5 reality 14:9 really 24:4 30:10,24 reason 21:19 26:1 reasonable 37:24 38:3,15 reasons 9:23 receipt 9:9 receive 17:16 25:7 received 6:21 8:3,23 9:14 11:15,16,20 15:18 25:20 26:22 39:5,6 39:21,22 recent 30:4 recently 21:11 reception 36:13 recognized 8:2 recommenda... 22:1 record 6:9,14 7:4,18 8:10 9:4 9:8,11,16,17 11:6 17:12 25:18 26:11 27:12,19 28:14</p>
---	---	---	---

<p>33:19 39:8,12 41:10</p> <p>recorded 41:7</p> <p>recordkeeping 16:13</p> <p>reduce 35:3</p> <p>regard 9:16 10:3</p> <p>regarding 7:4 40:2</p> <p>regardless 27:5 39:21</p> <p>region 1:21</p> <p>registered 1:9</p> <p>registrant 26:9</p> <p>registration 25:19</p> <p>regulated 19:18</p> <p>regulations 16:19</p> <p>regulatory 16:7 17:7 20:10 21:6</p> <p>reiterate 23:23</p> <p>related 8:19 24:11 26:8</p> <p>relates 34:18</p> <p>relations 35:19</p> <p>relationship 35:10</p> <p>relatively 33:24</p> <p>relevant 34:18</p> <p>reliable 22:3</p>	<p>remain 9:8 10:6 12:6 26:14</p> <p>remaining 31:16 33:16</p> <p>remarks 6:11 10:11 26:23</p> <p>remember 39:20</p> <p>remind 39:11</p> <p>remotely 41:5</p> <p>removed 27:5</p> <p>report 9:19 21:8</p> <p>reported 14:14</p> <p>reporter 1:10 6:17</p> <p>reporter's 9:13 39:3</p> <p>reporting 16:13</p> <p>reports 28:9</p> <p>represent 27:15 33:22</p> <p>representative 6:12,13</p> <p>representing 18:5 27:12 29:19 33:20 36:7</p> <p>request 3:4,5 11:20 19:2</p> <p>requesting 12:13 13:6 18:13</p>	<p>require 34:24</p> <p>required 16:1 17:7 20:15 23:15,17</p> <p>requirements 16:8,14 17:8 33:11</p> <p>researching 32:2</p> <p>resources 5:24</p> <p>respect 26:19 27:8</p> <p>respiratory 29:7</p> <p>respond 22:11 32:5</p> <p>responders 24:24 33:5</p> <p>responsibility 28:22</p> <p>responsible 18:6</p> <p>result 18:21 19:1 38:11</p> <p>results 15:9,14</p> <p>reveal 28:11</p> <p>review 9:22 15:19,21 16:2 16:7,20 17:20 25:10</p> <p>reviewed 9:19</p> <p>revised 11:15</p> <p>revisions 11:16</p> <p>revitalize 21:23</p>	<p>rezoning 18:17</p> <p>right 5:15 21:16 22:19,21 23:5,23 24:1 28:21,24 31:7 33:3,10</p> <p>rights 37:10</p> <p>river 21:16 24:22</p> <p>road 12:10</p> <p>rolling 13:2</p> <p>roofs 30:14</p> <p>rough 21:14 23:8</p> <p>roughly 14:14 19:23 22:22 24:11</p> <p>routine 21:12</p> <p>rule 38:9</p> <p>run 14:12 20:20</p> <p>rylands 38:7</p> <hr/> <p style="text-align: center;">s</p> <hr/> <p>s 3:1</p> <p>sackler 31:12</p> <p>safer 32:19</p> <p>safety 15:3,8,16 20:12 23:8,11 35:15</p> <p>samples 30:13 30:13</p> <p>save 29:13</p> <p>saying 7:12 26:18</p>
---	--	--	--

scale 21:2 schedule 23:14 23:20 scheduled 11:22,24 schedules 4:5 scientist 36:19 scope 23:6,10 scott 2:5 25:23 33:18,21,21 36:4 screen 4:21 5:6 screening 15:15 scrubber 13:21 seal 41:14 second 25:22 38:6 secretary 4:9 4:15 6:4 9:19 9:21 16:16 39:24 40:3,7 secretary's 9:7 10:8 section 8:16 10:19 secure 21:24 secured 21:1 security 20:15 20:21 21:8 see 4:21,22 15:10 24:3,21 30:14 37:16 39:8	select 4:23 5:2 5:4,6,8,9,11,13 5:14,16,17 separation 32:23 sept 3:6,8,12 september 11:21 seriously 31:1 31:12 35:22 serve 6:4 35:23 service 39:15 services 24:14 24:19 27:15 29:21 session 7:1,3 12:1,2 set 6:23 settings 5:9,10 several 17:21 sharing 26:16 sheet 3:13 shore 22:2 shoring 21:20 22:6 shorthand 41:7 show 4:21,22 4:24 5:17 23:24 shown 13:10 shows 15:9 sic 32:7,7 side 20:11,13 21:7	sierra 33:22 signature 41:16 simply 7:13 single 7:14 24:20 singular 7:13 sit 35:5 site 18:21,22 19:7 20:3,14 20:19 21:1 24:16 sites 19:9 size 21:15 skid 23:18 skilled 20:20 sleep 32:15 slide 13:10,15 15:9 18:9 19:15 20:17 21:18 22:12 23:1,3,21 24:7 smartphone 5:5 smith 1:13 4:1 5:19,20 6:3 17:15,23 25:4 25:13 29:15 31:15 33:14 36:3,11,17 38:22 social 39:19 soil 30:13 sold 20:5 solely 7:11 8:24	solutions 1:20 soon 6:20 9:14 39:5 source 12:22,22 13:16 14:20,22 southbridge 34:16 speaker 26:3 speakers 2:2 speaking 26:15 specialist 4:14 specifically 20:18 22:17 square 21:15 staff 10:12 staffed 20:21 standalone 32:22 standard 24:6 29:10,10,12 standards 16:19 20:15 23:24 24:1 28:15 stands 18:12 start 4:19 27:1 31:11 started 19:23 23:15 starts 26:11 state 3:9,11,12 5:23 11:18,23 16:8,19 27:11 29:18 33:19 37:2,7
--	--	--	---

<p>statement 28:23</p> <p>statements 41:6,10</p> <p>states 24:15</p> <p>stating 31:21 36:6</p> <p>statutory 9:15</p> <p>staying 37:17</p> <p>stemming 37:5</p> <p>steps 14:1 23:13</p> <p>stood 30:19</p> <p>stop 36:14</p> <p>storage 21:1</p> <p>strategic 20:6</p> <p>strategy 18:15</p> <p>stress 26:7</p> <p>strict 16:18 38:14</p> <p>strictly 38:12</p> <p>studied 28:13</p> <p>studies 30:10 30:11,12,12</p> <p>subject 7:11 8:24 9:3 26:9</p> <p>submission 7:23</p> <p>submit 7:24 8:7 26:4 31:16 33:16</p> <p>submitted 7:17 11:7 28:9 39:13,19 40:7</p>	<p>submitting 11:11 36:15</p> <p>subsidiary 32:22</p> <p>substances 20:14</p> <p>successful 17:5</p> <p>sue 38:21</p> <p>suite 1:21</p> <p>summary 10:23 11:1 18:11</p> <p>supervision 41:8</p> <p>supplier 20:6</p> <p>supplies 24:18</p> <p>supply 21:24 22:3</p> <p>support 11:14 12:14,17 21:4 21:11,21</p> <p>supported 7:14 16:20</p> <p>supporters 28:11</p> <p>supporting 23:12</p> <p>sure 4:17 35:21</p> <p>surrounding 24:15 35:10,14</p> <p>swedes 12:9 18:14</p> <p>synthesize 32:13</p> <p>synthesizing 32:18</p>	<p>system 13:22 26:12 29:7</p> <p>t</p> <p>t 3:1 41:1,1</p> <p>table 13:10 14:3 15:9,11</p> <p>tablets 19:21</p> <p>take 30:13,24 35:15 36:24 37:15</p> <p>taken 1:8 41:5</p> <p>takes 15:20</p> <p>talk 28:19 30:16</p> <p>talking 26:12 30:11 34:5</p> <p>tanasha 1:15</p> <p>taxes 24:11,12 37:20</p> <p>technical 15:22 16:2,11,11,20 21:10 26:1</p> <p>technologies 21:3,3</p> <p>tennett 1:16 18:1,3,4,5 25:5</p> <p>tennett's 31:2</p> <p>term 15:2 37:13</p> <p>terms 34:8</p> <p>test 37:15</p> <p>testimony 31:3</p> <p>testing 16:13</p> <p>text 39:20</p>	<p>thank 4:4 5:20 10:16 17:14,15 18:4 25:4,13 27:19 29:14,15 29:20 31:17 33:14,21 36:2 36:3 38:22 39:2 40:10</p> <p>therapies 19:19</p> <p>therefor 9:24</p> <p>thereof 41:12</p> <p>theresa 1:13 5:19 6:3 10:16</p> <p>thing 7:12 28:7 28:18 31:9 34:22</p> <p>things 35:21 38:12</p> <p>think 29:13 34:6,16,20 35:5,17</p> <p>third 25:22 38:3,5</p> <p>thoroughly 40:5</p> <p>thousand 7:15</p> <p>thousands 30:2</p> <p>three 4:23 5:8 8:4,6 9:11 22:23 26:10,13 26:17,19</p> <p>threshold 12:22,22 13:16 14:23</p>
---	---	---	---

tier 33:3 time 4:4,5 11:9 14:12 25:24 26:19 27:5 35:3 41:5 timer 26:11 title 12:19 13:1 18:16 22:15 tlv 14:23,24 15:6,11 today 18:6 25:17 31:3 tolerance 26:22 ton 14:15 tone 27:3 tonight 4:3,16 6:18 7:4,8 8:18 9:1,12,18 10:3 10:14 18:8 25:14 26:6 39:3 40:4 tonight's 4:7 6:5,8,23 7:11 9:9,15 25:16 26:9 39:1,10 tons 12:24 13:2 13:3,4,14,14,16 14:1,2,15 22:16,18 34:3 34:3,21 tool 14:19 top 5:14 20:6 20:15 tort 38:9	total 13:13 18:19 22:20 totals 14:4 tots 24:23 touched 23:22 town 7:2 toxic 37:3 toys 24:23 trade 37:3 traffic 18:24 transcribed 41:8 transcript 6:19 6:19 9:13,17 39:4 41:9 transcription 41:9 transfer 23:7 translation 5:1 5:11 transmission 38:16 transnational 37:3 treat 20:8 31:5 32:9 treatment 12:18 20:9 37:5 treatments 22:11 true 41:10 try 28:3 32:13 tuesday 1:10 4:6	turn 5:18 25:15 twice 26:3 twitter 39:19 two 9:6 11:10 12:15 13:19,20 23:3 35:11 tylenol 20:1 type 7:1 types 15:5 36:21,22 u u.s. 19:9 22:3 39:15 uk 20:12 ultimate 40:2 ultimately 9:21 unable 8:5 uncontrolled 13:11,13 under 8:15 14:15 16:19 18:15 22:17 31:8,8 37:24 41:8 undergoing 12:17 underserved 28:1 understand 28:17 32:18 understanding 32:3 understands 34:20	unfortunate 27:2 unhealthy 24:2 united 25:1 unknown 28:24 unmuted 26:1 27:11 29:17 31:20 33:18 36:5 unreliable 22:4 unsafe 37:6 unsecured 37:6 unstable 37:6 usage 22:8 use 18:18 19:4 19:6 38:10 used 14:19 16:10 19:9 20:5,8 using 4:18,20 39:19 utilizing 31:8,8 v v 12:19 13:1 18:16 22:15 38:7 vacuum 11:13 12:14 18:14 19:4 23:4,11 23:12,18 validated 19:11 value 14:23,23 variety 20:8 various 12:12 21:8 23:12
---	---	---	--

<p>40:6 verbal 8:5 26:5 31:17 verbatim 6:19 9:13 verify 15:23 veritext 1:20 versus 38:1 vet 40:5 veteran 29:21 veterans 29:23 30:2,3,5 video 26:14 virginia 1:14 4:8,13 virtual 1:1,8 5:23 9:3 virtually 6:7 visual 22:15 25:6 voc 34:1 vocs 12:23 13:3 13:14,16 14:1 14:3,15 18:19 22:16,20 34:4 34:19 volatile 12:23 volunteerism 24:19 vomiting 22:9 votes 7:14 vulnerable 34:24</p>	<p style="text-align: center;">w</p> <p>walls 2:4 25:22 29:17,20,21 31:15 want 4:4 7:16 18:10 25:13 26:7 29:4 30:22,23 39:2 39:10 wanted 23:23 23:24 24:8 war 30:6 warn 38:16 warning 27:3 way 25:1 35:11 ways 39:11 40:6 webpage 6:20 8:15,20 9:5,14 17:19 25:9 39:4,7,14,16 website 3:10,12 websites 7:22 weight 7:9,15 8:8 22:8 39:23 welfare 15:8,16 went 25:6 white 37:1 wide 13:1,7 14:13 willie 2:5 25:23 33:18,21 willingness 35:18</p>	<p>wilmington 1:22 12:10 20:18 23:6 24:10,12,13,16 27:16,17 28:12 31:7 32:1 33:23 wish 10:9 wishes 9:7 witness 41:14 wondered 32:12 workshop 7:2 worthy 34:6 writing 7:9 8:7 8:10 26:5 31:17 33:17 36:16 written 10:8 39:6,18</p> <p style="text-align: center;">x</p> <p>x 2:3 3:1 25:22 27:10,14,14 29:16</p> <p style="text-align: center;">y</p> <p>year 11:8 13:1 13:3,3,4,14,14 13:17 14:1,2,9 14:10,15,16 19:13 22:16,23 24:11,12,15 years 19:23 yielding 26:16</p>	<p>york 38:1 youtube 39:20</p> <p style="text-align: center;">z</p> <p>zero 26:22 zone 15:24 16:1 36:12 zones 30:6 zoning 15:23 15:24 zoom 4:11,18 6:7 41:5</p> <p style="text-align: center;">i</p> <p>i: 3:4,7</p>
---	--	---	--