

1 Public Hearing: Croda Inc. Federally Enforceable
2 7 DE Admin. Code 1102 Applications
3 Regarding 315 Cherry Lane, New Castle, DE
4

5 Docket No. 2023-P-A-0019

6 Permit No. APC-2023/0041 and APC-2023/0052
7

8 Moderated by Lisa Vest

9 Wednesday, December 6, 2023

10 6:00 p.m.
11

12
13 Zoom-DNREC

14 89 Kings Highway

15 Dover, DE 19901

16 (302) 739-9402
17

18
19
20
21 Reported by: Heidi Schoentube

22 JOB NO.: 6302023
23
24

A P P E A R A N C E S

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

List of Attendees:

Lisa Vest, Hearing Officer

Eric Rowland, DNREC Division of Air Quality

Josh Dube, Site Director, Croda Atlas Point

Virginia Jackson, Administrative Specialist

Martin Willis, Community Speaker

Sana Bell, Community Present

Chris Hood, Community Present

Olayiwola Okesola, Community Present

Amy Mann, Community Present DNREC

A, Community Present

Derrick Schweitzer, Community Present

Jeanette Gamble, Community Present

Jordan, Community Present

Tanesha Perry, DNREC

Peter Marchildon, Community Present

Silvana Dominioni, Community Present

1-302-276-3650, Community Present

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

C O N T E N T S

PAGE

Mr. Eric Rowland	13
Mr. Josh Dube	20
Mr. Martin Willis	31

E X H I B I T S

NO.	DESCRIPTION	PAGE
Department:		
Exhibit 1	Permit Application for Fire Pumps	19
Exhibit 2	Permit Application for Boiler 6	19
Exhibit 3	Updated AQM-5 for Fire Pumps (June 5, 2023)	19
Exhibit 4	Updated AQM-5 for Boiler 6 (June 9, 2023)	19
Exhibit 5	Technical Memorandum for Fire Pumps	19
Exhibit 6	Technical Memorandum for Boiler 6	19
Exhibit 7	Draft Construction Permit for Fire Pumps	19
Exhibit 8	Draft Construction Permit for Boiler 6	19

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

E X H I B I T S (Cont'd)

NO.	DESCRIPTION	PAGE
Department (Cont'd):		
Exhibit 9	Legal Notice - Delaware State News Affidavit	19
Exhibit 10	Legal Notice - News Journal Affidavit	19
Exhibit 11	Legal Notice - Spanish Translation	19
Exhibit 12	State Public Meeting Calendar Notice	19
Exhibit 13	DNREC Public Notice	19
Exhibit 14	DNREC Public Hearing Webpage	19
Exhibit 15	DNREC Presentation	19

P R O C E E D I N G S

1
2 THE HEARING OFFICER: -- time out of
3 their busy schedules during this holiday season to
4 join us. The date is Wednesday, December 6, 2023, and
5 we are here this evening to provide the virtual
6 platform for DNREC to hold its public hearing
7 concerning Croda's pending applications for
8 construction permits for their facility located at 315
9 Cherry Lane, New Castle, Delaware.

10 For those that may not know me, my name
11 is Lisa Vest. And the DNREC Secretary has designated
12 me to serve as hearing officer for tonight's
13 proceedings. I will apologize in advance; I've been
14 dealing with this cold that's going around. So if my
15 throat gives out, like I said, I'll apologize in
16 advance for that.

17 I would ask, Eric, if you could, just
18 for a second, to stop screensharing while we go
19 through some of this stuff. Thank you.

20 Pursuant to DNREC standard hearing
21 protocols, this hearing is being conducted virtually.
22 While there are no physical sign-in sheets to speak of
23 this evening, the Zoom platform does keep track of
24 those who are attending tonight virtually, and it

1 prepares an attendance sheet so the Department is
2 aware of those who've joined us tonight. And again, I
3 thank you for taking your time to be with us.

4 Before I set the parameters for the
5 proceeding tonight, I am going to turn things over for
6 a few minutes to Virginia Jackson. She is an
7 administrative specialist with the Office of the
8 Secretary. Virginia is going to offer some brief
9 instructions on how Zoom works.

10 There's a closed captioning feature,
11 and we want to make sure that if it will make things
12 easier for you to understand what's going on, we want
13 to make sure that you are able to turn that on and use
14 it.

15 So, Virginia, if you would, please take
16 that away. Virginia, I think you're muted.

17 MS. JACKSON: Thank you. Sorry about
18 that. Thanks, Lisa.

19 THE HEARING OFFICER: That's okay.

20 MS. JACKSON: Hello everyone. My name
21 is Virginia Jackson, and I'm the administrative
22 specialist with the Office of the Secretary, here to
23 assist the hearing officer tonight.

24 I'd like to make sure everyone is aware

1 that the Zoom platform we're using has the ability for
2 closed captioning in multiple languages. To start
3 closed captioning, if you're using a computer, at the
4 bottom of your screen you should see a "show captions"
5 button. If you do not see the "show captions" button,
6 you may have to select the three dots that says
7 "more."

8 Once you find your "show captions"
9 button, you should click the carrot pointing up, which
10 will bring up your translation options. You can
11 select your preferred language from there. If your
12 preferred language is not listed, you can select
13 "more," and all of the languages will be listed.

14 If you're on a smartphone, at the
15 bottom of your screen, select the captions button
16 indicated by "CC". If your preferred language is not
17 listed at the bottom, you may have to select the three
18 dots that says "more." You should then select
19 "meeting settings" with the gear icon that's next to
20 it. Once the settings page comes up, located at the
21 very bottom, select "translation language."

22 From there, you'll be able to select
23 your preferred language. Then select "done" at the
24 top right corner, and then "done" again. If the

1 captions are not automatically popping up yet, you may
2 need to select "captions" again, and select "show
3 captions."

4 Now I'll turn it back over to Hearing
5 Officer Lisa Vest.

6 THE HEARING OFFICER: Thanks, Virginia.

7 I'm going to give a few introductory
8 remarks, again, to kind of set the parameters for the
9 meeting tonight. After I get done with that, I will
10 be turning the floor over to representatives from the
11 Department. There's a brief presentation that they're
12 going to offer for inclusion into the record tonight
13 that kind of explains how we got here and all about
14 the permits that are currently pending.

15 After that, I'm going to turn it over
16 very briefly for another presentation that's being
17 offered by Croda themselves this evening. And
18 following that, we will go to those who have
19 pre-registered to offer live comment.

20 I would like to note that both the
21 Department's presentation and the presentation that
22 you'll be hearing from Croda have been posted on the
23 hearing webpage that's been designated for this
24 matter. You can find that on the DNREC website by

1 going to DNREC, and then look for the "admin law" tab.
2 And under "public hearings," all of our public
3 hearings are listed chronologically by the date of the
4 hearing. I think this one is the second or third one
5 from the top, so feel free.

6 You'll see all of the exhibits that are
7 going to be entered into the record tonight. You'll
8 see both presentations, and you'll also see any
9 comments that come in. And as soon as we get the
10 transcript that will be provided to DNREC by the court
11 reporter, we'll put that up as well. So there is a
12 variety of information that is available about this
13 matter on that hearing page, and I would encourage
14 everybody to check that out.

15 As far as the parameters for tonight,
16 first and foremost, this is a formal legal proceeding.
17 It is not a public information session. It's not a
18 workshop or any other kind of informal event, nor is
19 the purpose of tonight's hearing to advocate for any
20 one side in particular. Not the Department, not
21 members of the public, and not Croda.

22 This is just to provide the platform
23 for all of the information to be presented and to
24 offer a time and a place for those wishing to offer

1 live comment if they have pre-registered to do so. I
2 should note that while comments are appreciated, all
3 comments that come in for inclusion into the hearing
4 record in this matter, whether they come in tonight at
5 the hearing or whether they come in between now and
6 the time that the hearing record closes, they must be
7 related specifically to the subject matter of the
8 hearing tonight, which again, are the pending permits
9 before the Department from Croda.

10 All public comments made to DNREC
11 regarding this matter all bear the same weight, and
12 they'll all be considered equally by the Secretary
13 prior to his making a decision in this matter. As I
14 mentioned before, as they come in, they will be posted
15 on the hearing webpage dedicated to this matter.

16 I do want to note that it's very
17 important for anybody wishing to offer comment that
18 they specifically send it to me or to the hearing
19 comments email that we'll make sure everybody is aware
20 of before we leave tonight. And make sure that those
21 comments get submitted directly to DNREC. The
22 Department has not partnered with any third-party
23 organization or any other website. So if you want to
24 get your comments in, make sure that you submit them

1 to DNREC directly.

2 For those that pre-registered, and we
3 do have someone that has done so, when we get to that
4 portion, that pre-registrant will be offered three
5 minutes to offer their comment for the record.

6 If the comments are not concluded
7 within the three minutes that are available, members
8 of the public are certainly encouraged to offer
9 supplemental comments, in writing, for the record as
10 long as they are received by the Department prior to
11 the public comment period closing, which in this case
12 will be December 29, 2023. They'll be counted equally
13 just as if they were offered tonight live.

14 And while commenters that offer comment
15 live are limited to three minutes, the ability to
16 offer comment is endless with regard to written
17 comment that's offered subsequent to the hearing. And
18 again, as long as it comes into the Department between
19 now and December 29th, it gets counted just as if it
20 came in tonight.

21 Once again, the presentations that
22 you'll be seeing tonight, along with all other
23 documentation related to this project, are posted on
24 the hearing page.

1 Very briefly now, I want to go over the
2 following protocols that apply to all DNREC public
3 hearings. Number one, as previously mentioned, all
4 comment received must be limited solely to the subject
5 matter of tonight's hearing, which again, are the
6 pending applications submitted by Croda. All comments
7 pertinent to that subject matter will be incorporated
8 into the record and posted on the hearing webpage.

9 Number two, in order to ensure that
10 everyone who wishes to offer comment for the
11 Secretary's consideration is accommodated, the record
12 in this matter is not closing at the conclusion of
13 tonight's proceedings but rather, remains open through
14 December 29th.

15 Number three, there is only one
16 authentic record of these proceedings tonight, and it
17 is the official court reporter's transcript, which
18 again, will be posted to that hearing webpage as soon
19 as it is received by the Department.

20 Number four, the statutory purpose of
21 tonight's hearing is to build the record with regard
22 to the applicant's pending permit applications. A
23 record that consists of the transcript of the hearing
24 tonight, all written comments that may come in between

1 now and December 29th, all the exhibits that will be
2 referenced by the Department's presentation tonight,
3 and eventually the hearing officer's report, will all
4 be reviewed Secretary Garvin. The Secretary will
5 ultimately issue an order following that review
6 process, and that order will contain his decision in
7 this matter and his reasons therefor.

8 Number five, and lastly, it is
9 important to note that no decision has been made by
10 the Department, nor will any decision be made tonight
11 regarding these applications. Again, we are here
12 tonight just to simply offer the platform for the
13 information to be presented and made available to the
14 public, and for those who pre-registered to offer
15 comment.

16 That being said, I am going to turn it
17 now back over to the Department.

18 Eric, you may feel free to share your
19 screen and put your PowerPoint up, and you may begin
20 when ready.

21 MR. ROWLAND: Thank you, Lisa.

22 My name is Eric Rowland, and I am
23 engineer with the Engineering and Compliance section
24 of the Division of Air Quality. Thank you for joining

1 us today for the public hearing on these two air
2 permit applications for Croda.

3 Let me begin with a summary of each
4 project. Croda has submitted a construction permit
5 application for two 650-horsepower fire pumps, along
6 with a new 1.2-million-gallon water tank. It should
7 be noted that the water tank requires no air permits.
8 The fire pumps will be permitted for emergency use,
9 but this will include maintenance and testing. The
10 permit number assigned to this application is
11 APC-2023/0041-CONSTRUCTION (NSPS) (FE).

12 The emissions from the fire pumps
13 combined shall not exceed 1.9 tons per year of
14 nitrogen oxides, 0.04 tons per year of sulfur oxides,
15 0.59 tons per year of carbon monoxide, 0.04 tons per
16 year of volatile organic compounds, and 0.061 tons per
17 year of particulate matter.

18 Croda has also submitted a construction
19 permit application for the 110-million-BTU-per-hour
20 boiler, to be fired on Number 2 fuel oil, natural gas,
21 or a blend of natural gas and landfill gas. The
22 boiler will be permitted for unlimited use while fired
23 on natural gas, or natural gas/landfill gas blend.
24 And the boiler will be limited to 1,475 hours per year

1 of operation while fired on Number 2 fuel oil. The
2 permit number assigned to this application is
3 APC-2023/0052-CONSTRUCTION (NSPS) (MNSR) (PTE) (GACT)
4 (FE).

5 That 110-million-BTU-per-hour boiler
6 will be designated as Boiler 6. Emissions from Boiler
7 6 shall not exceed 21.7 tons per year of nitrogen
8 oxides, 4.8 tons per year of sulfur oxides, 6.4 tons
9 per year of carbon monoxide, 2.6 tons per year of
10 volatile organic compounds, and 4.46 tons per year of
11 particular matter.

12 I will briefly review the application
13 timeline. On December 22, 2022, DNREC received the
14 permit application for two 650-horsepower fire pumps.
15 On January 18, 2023, DNREC received the permit
16 application for the 110-million-BTU-per-hour boiler,
17 Boiler 6.

18 On June 5, 2023, DNREC received a
19 revised AQM-5 form for the 110-million-BTU-per-hour
20 boiler. On June 9, 2023, DNREC received the second
21 revision of the AQM-5 form for the
22 110-million-BTU-per-hour boiler.

23 On October 29, 2023, DNREC advertised a
24 combined legal ad for the fire pumps and Boiler 6.

1 Today, December 6, 2023, the public hearing is held
2 for these permit applications. And December 29, 2023,
3 is the deadline for public comment on these permit
4 applications.

5 Croda's Atlas Point facility is
6 considered a major source, and is subject to our Title
7 V operating permit program. Croda emits greater than
8 the EPA major source threshold for nitrogen oxides.

9 Additionally, the facility is a
10 synthetic minor source for both volatile organic
11 compounds and hazardous air pollutants. This means
12 that the facility has the potential to emit greater
13 than the EPA major source thresholds for these
14 pollutants but has taken federally-enforceable
15 operation limitations in their permit, to maintain
16 emissions below these thresholds.

17 Here we have a table of the EPA major
18 source thresholds, applicable in each of Delaware's
19 counties. As Croda is located in New Castle County,
20 Croda is a major source of nitrogen oxide, since the
21 facility's emissions may exceed 25 tons per year.

22 As previously mentioned, Croda is a
23 synthetic minor for volatile organic compounds and
24 hazardous air pollutants, since the permit limitations

1 have been taken to maintain emissions below the major
2 source thresholds listed.

3 Let me share a brief overview of our
4 permitting process. When the application is received,
5 it is reviewed for both administrative and technical
6 completeness. If not complete, it will be returned to
7 a facility for correction.

8 Additional checks are performed to
9 determine if the facility is in the coastal zone, and
10 if so, if the project has been reviewed by DNREC's
11 Division of Climate, Coastal and Energy. Local zoning
12 will be checked to ensure that the project is allowed
13 in the current zoning, or if special-use permits are
14 required.

15 The application or applications will be
16 publicly advertised, and if requested, a public
17 hearing will be held. However, in this particular
18 case a public hearing was requested by Croda and
19 scheduled in advance.

20 If the construction permit is issued,
21 the facility will construct the equipment described
22 and will contact the Division of Air Quality prior to
23 operating the equipment for a
24 construction-to-operation permit. Following a

1 successful construction-to-operation permit, the terms
2 of the construction permit will be incorporated into
3 the company's Title V operating permit.

4 That concludes the Department's
5 presentation. As you can see, there are a number of
6 exhibits that the Department would like to enter into
7 the record.

8 THE HEARING OFFICER: Okay. Thank you,
9 Eric, for that brief presentation. Just for
10 record-keeping purposes, are the 15 exhibits that are
11 listed on the two slides being displayed now the same
12 as those that were posted on the hearing webpage in
13 this case?

14 MR. ROWLAND: Yes, they are.

15 THE HEARING OFFICER: And have they
16 been changed or altered in any way since that posting?

17 MR. ROWLAND: No, they have not.

18 THE HEARING OFFICER: Excellent. All
19 right. Let the record reflect that DNREC Exhibits 1
20 through 15, as identified just now in the Department's
21 presentation, and as identified on the hearing
22 webpage, are hereby entered into the record being
23 compiled in this matter, and they will be marked at
24 this time as Department Exhibits 1 through 15.

1 (Department Exhibit 1 through Exhibit
2 15 were marked for identification.)

3 Eric, does the department have anything
4 further it wishes to offer for the record at this
5 time?

6 MR. ROWLAND: No, it does not.

7 THE HEARING OFFICER: Okay. Very good.
8 Thank you for that presentation. I would ask that you
9 take down that presentation but have it handy because
10 when we get to the end of tonight's proceedings, I
11 want to put that final slide up when we talk about how
12 people can offer comment. So thank you again for that
13 presentation.

14 At this point, I am going to ask that
15 Croda please share its screen.

16 Josh, whenever you are ready. Once
17 it's up, you may begin your side, or your
18 presentation, rather.

19 MR. DUBE: Okay. Just give me one
20 second to move some things around. There you go. Are
21 you able to see that?

22 THE HEARING OFFICER: Yes. You are
23 full-screen.

24 MR. DUBE: All right. Thank you.

1 So good evening. I'm Josh Dube, the
2 site director for Croda Atlas Point, here to talk
3 about two permits that we applied for with DNREC.
4 We've already discussed the permits; we've been
5 wanting to tell you a little bit about Croda.

6 Very proud of the people and the team
7 that we have at Atlas Point keeping the facility
8 operational. We have an experienced team of technical
9 personnel that keeps looking for new ways to make us a
10 better neighbor. Some of those ideas are actually why
11 we're here tonight.

12 We have an exceptional team of union
13 members, union operators, that are performing the
14 daily operations of the plant. Our union was actually
15 recently featured on the United Steelworkers Magazine;
16 this is the cover shot from that, one of our operators
17 with some of our equipment in the background.

18 Outside of developing our outstanding
19 team, Croda continually looks at ways to increase our
20 safety on the site. So the photo here in the top
21 right is the water tank that we voluntarily installed
22 to maintain a larger volume of water for emergencies.
23 It's the same tank that Eric was just talking about
24 that we added, the 1.2-million-gallon tank. We will

1 talk a little bit more about that when we get to the
2 permit section.

3 And in sustainability, our site does an
4 excellent job at using sustainable, renewable energy
5 at the site. We currently have two solar fields.
6 This is one of them here in the bottom right-hand
7 corner.

8 We also generate some of our own steam
9 and electricity from waste gas produced from the
10 Cherry Island Landfill. And then the remainder of our
11 electricity is actually purchased from renewable
12 resources. These are all ways that we reduced our
13 carbon footprint in the area.

14 A little bit here on our site. So our
15 facility is located near the Delaware Memorial Bridge
16 that's kind of here in this upper right-hand corner.
17 And we're boxed in to the west here by a railroad
18 track. The yellow is actually our site. And then you
19 can see on the east and south side we're boxed in by
20 the Delaware River and then the marshlands that
21 surround us.

22 Today we manufacture surfactants, which
23 are ingredients that help oil and water combine. And
24 they're used in a lot of everyday products that we all

1 use. This is done through a team of approximately 230
2 people at the site, half of whom are the United
3 Steelworkers Union I mentioned earlier.

4 The products we make are shipped
5 globally and are used in many household name brands.
6 So you won't see Croda's name on the products in your
7 home or at stores, but our products are in, you know,
8 shampoos, conditioners, make-up, baby products,
9 cleaning supplies. You know, things that you'd find
10 in your home and use on an everyday basis.

11 We also support the food you buy, from
12 helping with seed growth to keeping your apples safe,
13 you know, while they're growing in the field, as
14 examples.

15 Just jumping here to the next slide.
16 Here at Croda we are also taking our responsibility to
17 New Castle community very seriously. We support the
18 local economy in many ways. We partner with Colonial
19 School District. We help a number of non-profits
20 including Rose Hill Community Center, Food Bank of
21 Delaware -- improved safety processes, and at our site
22 we have installed equipment to help drive down the
23 emissions generated by our operations.

24 In addition, we do try to share that

1 information with the public on our website, and you
2 can find that by Googling Croda Atlas Point. We can
3 also record timely information on our community
4 information line.

5 So if there's something going on and
6 you'd like to know, you know, what's happening at
7 Croda, you can actually call this community info line
8 number, (302) 429-5474. And there's usually a message
9 on there if there's something currently happening that
10 we'll leave so people can call in and listen to that
11 and get an understanding of what's going on.

12 And we also take emails from the
13 community at this address here, that's
14 atlaspoint.ce@croda.com. So if you have comments,
15 questions, you can also send communications that way
16 and we'll respond.

17 We also participate in the Route 9
18 Corridor Committee meetings, and regularly share
19 information with that group. Mail information to our
20 community, notification siren systems in the
21 surrounding area. And we test this system about four
22 times a year.

23 We also engage our community advisory
24 council about our current activities. This council is

1 made up of community leaders, educators, first
2 responders, and business and residential neighbors.
3 Council does meet four times a year, and we keep in
4 regular communications about important details of
5 things that are happening with us so that they can
6 hopefully pass it on to the community and keep people,
7 kind of, abreast to what we're doing.

8 In line with that, we actually met with
9 them last night and discussed these same slides that
10 we're going through tonight to, again, just kind of
11 get it out there in the community more so people can,
12 you know, see these things coming and ask questions as
13 they're being developed.

14 So that's just a little bit about
15 Croda. I'll jump back now to, kind of, you know, why
16 we're here tonight. So you do hear from DNREC that we
17 are seeking two permits for equipment improvements.

18 The first is a permit to operate a new
19 boiler that will look a lot like this photo here. The
20 new boiler is replacing a boiler that's actually from
21 the 1940s. So our new model will be more energy
22 efficient, reduce emissions, and allow us to use more
23 of that landfill gas from Cherry Island Landfill to
24 help support sustainability, reduce cumulative impacts

1 in the New Castle County area here. The new boiler is
2 also -- the new boiler equipment, sorry, generates
3 steam for our facility, which is needed for many of
4 our operations.

5 The reason a permit is required to
6 replace the old boiler is that fuel is used to power
7 the new boiler, and the use of the fuel generates some
8 emissions. In this case, it will generate less
9 emissions than the old, but a permit is still
10 required. This is a replacement boiler with upgrades
11 to help with safety and emissions by using the latest
12 technologies. So we're not just going to do a
13 replacement, kind of, bring back something from the
14 1940s; right? We're going to do better than that.

15 Some of the bullet points here that
16 you can actually see talks about replacing the boiler
17 from the 1940s. It's at the end of its life, so it's
18 time for a new one. It's time for an upgrade.

19 The primary fuels, as mentioned by
20 Eric, are the natural gas and then landfill gas that's
21 recovered from Cherry Island, and then fuel oil is a
22 possibility up to so many hours, as pointed out by
23 Eric. Our opinion here on site is that we only use
24 fuel oil as a backup when required.

1 So there are points where the natural
2 gas company can call and say, "Well, you can't take
3 more natural gas today," so we basically have to stop
4 using natural gas. And there are some points where
5 Cherry Island Landfill can't supply us enough gas. So
6 on those days, we do switch over to fuel oil as a
7 backup, but it is not something that we purposely try
8 to use.

9 This new boiler, best available control
10 technology for N-O-X, for NOx emissions. It also has
11 a ultra-low NOx burner technology built in, and then a
12 flue gas recirculation. All things to help us bring
13 down our carbon footprint and emissions footprint.

14 Overall emissions for the community
15 will be reduced verse that 1940s boiler that we talked
16 about. And this meets or exceeds the EPA and DNREC
17 regulations moving forward. Let's see. The next --
18 that's -- that's one permit for the boiler.

19 The second one that we're here to talk
20 about is the fire water pumps. So we are applying for
21 two new diesel fire water pumps. We are applying for
22 this permit wholly based on improving safety. So we
23 voluntarily chose to install that second water tank we
24 talked about earlier. You can actually -- you can now

1 see it when you're driving across the Delaware
2 Memorial Bridge.

3 This second water tank will allow us to
4 store more water on the property, and we'd like to be
5 able to use that for an emergency if needed. So to
6 appropriately use this water for emergencies, we'd
7 like to add these two new 5,000-gallon-per-minute
8 pumps. And that will actually increase our emergency
9 water from 5,000 gallons a minute to 7500 gallons per
10 minute, so a good increase for emergency purposes.

11 Since the pumps are powered by diesel
12 and will have emissions if they are used, a permit is
13 required. So again, that's why we're here tonight.

14 I do want to point out that these will
15 only run for emergency purposes and at times of
16 testing and maintaining the system. These will not
17 run on a daily basis. This is not something we're
18 going to turn on and just leave on.

19 This is truly -- if we're having an
20 emergency, they're started, and they use the water for
21 emergency purposes and use those pumps for emergency
22 purposes. So, again, the bullets here, just to walk
23 through -- so it's two new pumps used for emergencies
24 only; they're not going to run continuous.

1 They are powered by diesel engines, and
2 that meets the NFPA, so the National Fire Protection
3 Association. So as opposed to using electric motors,
4 we've had that question, you know, "Hey, why not use
5 electric and do away with the emissions?" Electric
6 just are not part of what the NFPA says is a proper
7 way to maintain your fire protection, so that's why
8 we're looking at diesel engines. And they also meet
9 the EPA and DNREC regulations.

10 So those are the two permits that we're
11 requesting from DNREC tonight. We have been working
12 on communicating our plans for these permit
13 applications in the community.

14 Before we submitted the boiler permit,
15 we had presented the proposed plan to the Route 9
16 Monitoring Committee as a part of the County land
17 developments. Presented the information to our
18 Community Advisory Committee, and brought the
19 Community Advisory Council on our site to tour our
20 facility to actually show them where the boiler would
21 be installed.

22 As for the water tank and pump, we've
23 been discussing and giving updates on that project
24 since, you know, December of 2021, through a lot of

1 the same pathways. Again, just trying to get open
2 discussions going and let people know what we're
3 trying to actively pursue.

4 Outside of actively discussing these
5 permits, we've been promoting the community as well.
6 We enjoy supporting New Castle Senior Center,
7 volunteering with the Junior Achievement of Delaware,
8 and helping put the Narcan kits with the Department of
9 Health and Social Services together, and sponsoring
10 local science fairs and other STEM presentations, and
11 countless other activities in the area that the
12 residents kind of identify as being important to them,
13 and that's where we're trying to help.

14 So that's what I have. Thank you, you
15 know, for joining us tonight. And I want to say,
16 we're working hard to be responsive to our neighbors
17 in New Castle, and we did voluntarily request this
18 hearing to share the information about our operations,
19 and I hope it was helpful. Thank you for your
20 interest in listening. Turn it back over DNREC.

21 THE HEARING OFFICER: Thank you, Josh,
22 for that presentation.

23 Again, just a reminder, as I mentioned
24 previously, we will have -- I think we already do, as

1 a matter of fact, have the presentation that Croda
2 just did up on the hearing webpage. So you can feel
3 free, if you wish, to check that out, again, at your
4 leisure. Especially if you're planning on offering
5 comments between now and December 29th, it might be a
6 good review and a rehash before you make the comment.

7 And thank you again, Josh, for that
8 presentation.

9 At this point of the proceedings, we
10 are going to turn to the live comment portion. As I
11 mentioned in my opening remarks, DNREC's protocols
12 with regard to live comment at hearings is that those
13 who wish to offer comment at the hearings are free to
14 do so, provided that they pre-register with the
15 Department up until noon of the day of the hearing.
16 So as of noon today, we had one person that has
17 pre-registered to speak. That is Martin Willis.

18 And, Mr. Willis, I believe I saw your
19 name on the attendance list. I think that Virginia is
20 taking care of making sure that your microphone is
21 unmuted.

22 MR. WILLIS: Yes.

23 THE HEARING OFFICER: Okay.

24 Mr. Willis, you know the routine. There are three

1 minutes available to you to offer comment. The clock
2 will start when you do, so fire when ready.

3 MR. WILLIS: My name is Martin Willis,
4 and I'm a Union Boilermaker from New Castle, Delaware.
5 Before I go any further, I have to mention that I have
6 been a member of Croda's advisory council since 2019,
7 and have been aware of the boiler replacement project
8 for at least the last year and a half.

9 With that said, I've also read Croda's
10 109-page air draft permit, permit for Boiler Number 6,
11 as it appears on DNREC's website. From what I have
12 learned from the advisory council quarterly meetings
13 and a draft permit, Croda would like to replace Boiler
14 Number 3, that was first put into operation after
15 World War II, and replace it with the best available
16 technology steam boiler, Boiler Number 6.

17 Common sense and sound judgment, simply
18 based on the fact that a steam boiler, Boiler Number
19 6, that is built in 2023, is going to be more
20 efficient, environmentally regulated, energy
21 efficient, and good for the State of Delaware. If
22 Croda is allowed to replace Boiler Number 3 with
23 Boiler Number 6, it will show that Croda is committed
24 to Atlas Point site well into the next 25 to 50 years

1 with good paying manufacturing jobs.

2 Finally, I have to say that the draft
3 permit is very well written and detailed, and I think
4 that the Secretary of DNREC should approve this
5 permit. That's all I have to say. Thank you.

6 THE HEARING OFFICER: Thank you, Mr.
7 Willis. And again, your comments, of course, will be
8 incorporated into the court reporter's transcript,
9 which covers everything that we've done tonight. And
10 we usually get that within a week following the
11 hearing, so as soon as we get it from the court
12 reporter, we will post that on the webpage as well.

13 And you all out there that are
14 attending are free to review it, download it, and do
15 what you will with it. It's there for your benefit.

16 At this point, like I said, we only had
17 one person that offered pre-registration, so that
18 concludes the live portion of the comments for this
19 evening.

20 So in conclusion, I just want to draw
21 everyone's attention to the final screen that you're
22 now looking at. This is our thank you, essentially,
23 for joining us this evening. Again, the comment
24 period is open through December 29, 2023. Comments

1 may be submitted in writing, as the slide says, via
2 the DNREC comment form that you can find that is a
3 button right off of the public hearing webpage, via
4 email, to dnrechearingcomments@delaware.gov, or by
5 good old USPS mail to my attention as the hearing
6 officer at DNREC, Office of the Secretary, 89 Kings
7 Highway, Dover, Delaware 19901.

8 And again, at the very bottom of that
9 screen, you will see that there is a URL that will
10 take you directly to the public hearing page. If you
11 forget that or you can't remember that, just look up
12 DNREC. Google it, and when you get the DNREC webpage,
13 look for the little tab that says "admin law, go to
14 public hearings."

15 And, as I said, all of our public
16 hearings are listed chronologically. They do not come
17 down off that webpage. So you can look at this one or
18 any of the ones that are coming up or the ones that
19 have come and gone.

20 And right there you will see the
21 ability to offer the comment and look at all the
22 exhibits and everything that we've done tonight. I
23 should mention that while there are a variety of ways
24 to submit your comments in writing, comments may not

1 be submitted using social media platforms such as
2 Twitter, Facebook, YouTube, or standardized text
3 messaging.

4 And again, as I said, in closing, all
5 comments, whether they came in as Mr. Willis's did
6 tonight live at the hearing, or whether they come in
7 in writing to us in any of the many ways that you can
8 do it, they all bear the same weight. They'll all be
9 incorporated into the hearing record, and the
10 Secretary will review all of them prior to his making
11 a decision in this matter.

12 Again, this hearing provides the
13 standard mechanism that the Department uses to not
14 only make sure that the public is aware of the pending
15 applications that are before the Department, but also
16 enabling the public to offer comment if they wish to
17 do so.

18 I want to thank everybody again for
19 taking time out of their busy nights to be here. Have
20 a great holiday season. This hearing is adjourned.

21 (Whereupon, at 6:37 p.m., the
22 proceeding was concluded.)

23
24

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

CERTIFICATE

I, HEIDI SCHOENTUBE, 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.



HEIDI SCHOENTUBE

Notary Public in and for the
State of Pennsylvania

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

CERTIFICATE OF TRANSCRIBER

I, DAVID SHAHVERDIAN, 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.



DAVID SHAHVERDIAN

0	2	4	a
0.04 14:14,15 0.061 14:16 0.59 14:15 0019 1:5	2 3:11 14:20 15:1 2.6 15:9 20 3:4	4 3:14 4.46 15:10 4.8 15:8 429-5474 23:8	ability 7:1 11:15 33:21 35:10 36:7 able 6:13 7:22 19:21 27:5
1	2019 31:6 2021 28:24 2022 15:13 2023 1:5,9 3:13 3:15 5:4 11:12 15:15,18,20,23 16:1,2 31:19 32:24 2023/0041 1:6 14:11 2023/0052 1:6 15:3 21.7 15:7 22 15:13 230 22:1 25 16:21 31:24 25608 35:16 29 11:12 15:23 16:2 32:24 29th 11:19 12:14 13:1 30:5	5 5 3:12,13,14,16 15:18,19,21 5,000 27:7,9 50 31:24	abreast 24:7 accommodated 12:11 accurate 35:9 36:5 achievement 29:7 action 35:12,16 36:8,12 actively 29:3,4 activities 23:24 29:11 actually 20:10 20:14 21:11,18 23:7 24:8,20 25:16 26:24 27:8 28:20
1 3:10 18:19,24 19:1 1,475 14:24 1-302-276-3... 2:19 1.2 14:6 20:24 1.9 14:13 10 4:6 109 31:10 11 4:8 110 14:19 15:5 15:16,19,22 1102 1:2 12 4:10 13 3:3 4:12 14 4:13 15 4:14 18:10 18:20,24 19:2 18 15:15 19 3:10,11,13 3:15,17,19,21 3:23 4:5,7,9,11 4:12,13,14 1940s 24:21 25:14,17 26:15 19901 1:15 33:7	3 3 3:12 31:14,22 302 1:16 23:8 31 3:5 315 1:3 5:8 32489 36:14	6 6 1:9 3:11,14 3:18,19,23 5:4 15:6,7,17,24 16:1 31:10,16 31:19,23 6.4 15:8 6302023 1:22 650 14:5 15:14 6:00 1:10 6:37 34:21	ad 15:24 add 27:7 added 20:24 addition 22:24 additional 17:8 additionally 16:9 address 23:13 adjourned 34:20 admin 1:2 9:1 33:13
		7 7 1:2 3:20 739-9402 1:16 7500 27:9	
		8 8 3:22 89 1:14 33:6	
		9 9 3:15 4:4 15:20 23:17 28:15	

<p>administrative 2:6 6:7,21 17:5</p> <p>advance 5:13 5:16 17:19</p> <p>advertised 15:23 17:16</p> <p>advisory 23:23 28:18,19 31:6 31:12</p> <p>advocate 9:19</p> <p>affidavit 4:5,7</p> <p>air 2:4 13:24 14:1,7 16:11 16:24 17:22 31:10</p> <p>allow 24:22 27:3</p> <p>allowed 17:12 31:22</p> <p>altered 18:16</p> <p>amy 2:11</p> <p>anybody 10:17</p> <p>apc 1:6,6 14:11 15:3</p> <p>apologize 5:13 5:15</p> <p>appears 31:11</p> <p>apples 22:12</p> <p>applicable 16:18</p> <p>applicant's 12:22</p> <p>application 3:10,11 14:5 14:10,19 15:2</p>	<p>15:12,14,16 17:4,15</p> <p>applications 1:2 5:7 12:6,22 13:11 14:2 16:2,4 17:15 28:13 34:15</p> <p>applied 20:3</p> <p>apply 12:2</p> <p>applying 26:20 26:21</p> <p>appreciated 10:2</p> <p>appropriately 27:6</p> <p>approve 32:4</p> <p>approximately 22:1</p> <p>aqm 3:12,14 15:19,21</p> <p>area 21:13 23:21 25:1 29:11</p> <p>assigned 14:10 15:2</p> <p>assist 6:23</p> <p>association 28:3</p> <p>atlas 2:5 16:5 20:2,7 23:2 31:24</p> <p>atlaspoint.ce 23:14</p> <p>attendance 6:1 30:19</p>	<p>attendees 2:2</p> <p>attending 5:24 32:14</p> <p>attention 32:21 33:5</p> <p>attorney 35:14 36:10</p> <p>audio 35:8 36:3</p> <p>authentic 12:16</p> <p>automatically 8:1</p> <p>available 9:12 11:7 13:13 26:9 31:1,15</p> <p>aware 6:2,24 10:19 31:7 34:14</p> <hr/> <p style="text-align: center;">b</p> <hr/> <p>b 3:7 4:1</p> <p>baby 22:8</p> <p>back 8:4 13:17 24:15 25:13 29:20</p> <p>background 20:17</p> <p>backup 25:24 26:7</p> <p>bank 22:20</p> <p>based 26:22 31:18</p> <p>basically 26:3</p> <p>basis 22:10 27:17</p> <p>bear 10:11 34:8</p>	<p>believe 30:18</p> <p>bell 2:8</p> <p>benefit 32:15</p> <p>best 26:9 31:15 35:10 36:6</p> <p>better 20:10 25:14</p> <p>bit 20:5 21:1,14 24:14</p> <p>blend 14:21,23</p> <p>boiler 3:11,14 3:19,23 14:20 14:22,24 15:5 15:6,6,16,17,20 15:22,24 24:19 24:20,20 25:1 25:2,6,7,10,16 26:9,15,18 28:14,20 31:7 31:10,13,16,16 31:18,18,22,23</p> <p>boilermaker 31:4</p> <p>bottom 7:4,15 7:17,21 21:6 33:8</p> <p>boxed 21:17,19</p> <p>brands 22:5</p> <p>bridge 21:15 27:2</p> <p>brief 6:8 8:11 17:3 18:9</p> <p>briefly 8:16 12:1 15:12</p>
---	--	---	---

bring 7:10 25:13 26:12 brought 28:18 btu 14:19 15:5 15:16,19,22 build 12:21 built 26:11 31:19 bullet 25:15 bullets 27:22 burner 26:11 business 24:2 busy 5:3 34:19 button 7:5,5,9 7:15 33:3 buy 22:11	25:1 29:6,17 31:4 cc 7:16 center 22:20 29:6 certainly 11:8 certificate 35:1 36:1 certify 35:4 36:2 changed 18:16 check 9:14 30:3 checked 17:12 checks 17:8 cherry 1:3 5:9 21:10 24:23 25:21 26:5 chose 26:23 chris 2:9 chronologica... 9:3 33:16 cleaning 22:9 click 7:9 climate 17:11 clock 31:1 closed 6:10 7:2 7:3 closes 10:6 closing 11:11 12:12 34:4 coastal 17:9,11 code 1:2 cold 5:14 colonial 22:18	combine 21:23 combined 14:13 15:24 come 9:9 10:3,4 10:5,14 12:24 33:16,19 34:6 comes 7:20 11:18 coming 24:12 33:18 comment 8:19 10:1,17 11:5 11:11,14,16,17 12:4,10 13:15 16:3 19:12 30:6,10,12,13 31:1 32:23 33:2,21 34:16 commenters 11:14 comments 9:9 10:2,3,10,19,21 10:24 11:6,9 12:6,24 23:14 30:5 32:7,18 32:24 33:24,24 34:5 committed 31:23 committee 23:18 28:16,18 common 31:17 communicating 28:12	communicati... 23:15 24:4 community 2:7 2:8,9,10,11,12 2:13,14,15,17 2:18,19 22:17 22:20 23:3,7 23:13,20,23 24:1,6,11 26:14 28:13,18 28:19 29:5 company 26:2 company's 18:3 compiled 18:23 complete 17:6 completeness 17:6 compliance 13:23 compounds 14:16 15:10 16:11,23 computer 7:3 concerning 5:7 concluded 11:6 34:22 concludes 18:4 32:18 conclusion 12:12 32:20 conditioners 22:8 conducted 5:21
c			
c 2:1 3:1 5:1 calendar 4:10 call 23:7,10 26:2 captioning 6:10 7:2,3 captions 7:4,5 7:8,15 8:1,2,3 carbon 14:15 15:9 21:13 26:13 care 30:20 carrot 7:9 case 11:11 17:18 18:13 25:8 castle 1:3 5:9 16:19 22:17			

<p>consideration 12:11</p> <p>considered 10:12 16:6</p> <p>consists 12:23</p> <p>construct 17:21</p> <p>construction 3:20,22 5:8 14:4,11,18 15:3 17:20,24 18:1,2</p> <p>cont'd 4:1,3</p> <p>contact 17:22</p> <p>contain 13:6</p> <p>continually 20:19</p> <p>continuous 27:24</p> <p>control 26:9</p> <p>corner 7:24 21:7,16</p> <p>correction 17:7</p> <p>corridor 23:18</p> <p>council 23:24 23:24 24:3 28:19 31:6,12</p> <p>counsel 35:11 35:14 36:7,10</p> <p>counted 11:12 11:19</p> <p>counties 16:19</p> <p>countless 29:11</p> <p>county 16:19 25:1 28:16</p>	<p>course 32:7</p> <p>court 9:10 12:17 32:8,11</p> <p>cover 20:16</p> <p>covers 32:9</p> <p>croda 1:1 2:5 8:17,22 9:21 10:9 12:6 14:2 14:4,18 16:7 16:19,20,22 17:18 19:15 20:2,5,19 22:16 23:2,7 24:15 30:1 31:13,22,23</p> <p>croda's 5:7 16:5 22:6 31:6 31:9</p> <p>croda.com. 23:14</p> <p>cumulative 24:24</p> <p>current 17:13 23:24</p> <p>currently 8:14 21:5 23:9</p> <hr/> <p style="text-align: center;">d</p> <hr/> <p>d 5:1</p> <p>daily 20:14 27:17</p> <p>date 5:4 9:3</p> <p>david 36:2,15</p> <p>day 30:15</p> <p>days 26:6</p>	<p>de 1:2,3,15</p> <p>deadline 16:3</p> <p>dealing 5:14</p> <p>december 1:9 5:4 11:12,19 12:14 13:1 15:13 16:1,2 28:24 30:5 32:24</p> <p>decision 10:13 13:6,9,10 34:11</p> <p>dedicated 10:15</p> <p>delaware 4:4 5:9 21:15,20 22:21 27:1 29:7 31:4,21 33:7</p> <p>delaware's 16:18</p> <p>delaware.gov 33:4</p> <p>department 3:9 4:3 6:1 8:11 9:20 10:9,22 11:10,18 12:19 13:10,17 18:6 18:24 19:1,3 29:8 30:15 34:13,15</p> <p>department's 8:21 13:2 18:4 18:20</p>	<p>derrick 2:13</p> <p>described 17:21</p> <p>description 3:8 4:2</p> <p>designated 5:11 8:23 15:6</p> <p>detailed 32:3</p> <p>details 24:4</p> <p>determine 17:9</p> <p>developed 24:13</p> <p>developing 20:18</p> <p>developments 28:17</p> <p>diesel 26:21 27:11 28:1,8</p> <p>digital 35:8 36:3</p> <p>directly 10:21 11:1 33:10</p> <p>director 2:5 20:2</p> <p>discussed 20:4 24:9</p> <p>discussing 28:23 29:4</p> <p>discussions 29:2</p> <p>displayed 18:11</p> <p>district 22:19</p> <p>division 2:4 13:24 17:11,22</p>
--	---	---	--

<p>dnrec 1:13 2:4 2:11,16 4:12 4:13,14 5:6,11 5:20 8:24 9:1 9:10 10:10,21 11:1 12:2 15:13,15,18,20 15:23 18:19 20:3 24:16 26:16 28:9,11 29:20 32:4 33:2,6,12,12 dnrec's 17:10 30:11 31:11 dnrehearing... 33:4 docket 1:5 documentation 11:23 doing 24:7 dominioni 2:18 dots 7:6,18 dover 1:15 33:7 download 32:14 draft 3:20,22 31:10,13 32:2 draw 32:20 drive 22:22 driving 27:1 dube 2:5 3:4 19:19,24 20:1 duly 35:5</p>	<p style="text-align: center;">e</p> <p>e 2:1,1 3:1,7 4:1 5:1,1 earlier 22:3 26:24 easier 6:12 east 21:19 economy 22:18 educators 24:1 efficient 24:22 31:20,21 electric 28:3,5 28:5 electricity 21:9 21:11 email 10:19 33:4 emails 23:12 emergencies 20:22 27:6,23 emergency 14:8 27:5,8,10 27:15,20,21,21 emissions 14:12 15:6 16:16,21 17:1 22:23 24:22 25:8,9,11 26:10,13,14 27:12 28:5 emit 16:12 emits 16:7 employed 35:11,14 36:8 36:11</p>	<p>employee 35:13 36:10 enabling 34:16 encourage 9:13 encouraged 11:8 endless 11:16 energy 17:11 21:4 24:21 31:20 enforceable 1:1 16:14 engage 23:23 engineer 13:23 engineering 13:23 engines 28:1,8 enjoy 29:6 ensure 12:9 17:12 enter 18:6 entered 9:7 18:22 environment... 31:20 epa 16:8,13,17 26:16 28:9 equally 10:12 11:12 equipment 17:21,23 20:17 22:22 24:17 25:2 eric 2:4 3:3 5:17 13:18,22</p>	<p>18:9 19:3 20:23 25:20,23 es 35:4 especially 30:4 essentially 32:22 evening 5:5,23 8:17 20:1 32:19,23 event 9:18 eventually 13:3 everybody 9:14 10:19 34:18 everyday 21:24 22:10 everyone's 32:21 examples 22:14 exceed 14:13 15:7 16:21 exceeds 26:16 excellent 18:18 21:4 exceptional 20:12 exhibit 3:10,11 3:12,14,16,18 3:20,22 4:4,6,8 4:10,12,13,14 19:1,1 exhibits 9:6 13:1 18:6,10 18:19,24 33:22 experienced 20:8</p>
--	--	--	---

explains 8:13	first 9:16 24:1 24:18 31:14	gallon 14:6 20:24 27:7	33:5
f	five 13:8	gallons 27:9,9	google 33:12
facebook 34:2	floor 8:10	gamble 2:14	googling 23:2
facility 5:8 16:5 16:9,12 17:7,9 17:21 20:7 21:15 25:3 28:20	flue 26:12	garvin 13:4	great 34:20
facility's 16:21	following 8:18 12:2 13:5 17:24 32:10	gas 14:20,21,21 14:23,23,23 21:9 24:23 25:20,20 26:2 26:3,4,5,12	greater 16:7,12
fact 30:1 31:18	food 22:11,20	gear 7:19	group 23:19
fairs 29:10	footprint 21:13 26:13,13	generate 21:8 25:8	growing 22:13
far 9:15	foregoing 35:3 35:4 36:4	generated 22:23	growth 22:12
fe 14:11 15:4	foremost 9:16	generates 25:2 25:7	h
feature 6:10	forget 33:11	give 8:7 19:19	h 3:7 4:1
featured 20:15	form 15:19,21 33:2	gives 5:15	half 22:2 31:8
federally 1:1 16:14	formal 9:16	giving 28:23	hand 21:6,16
feel 9:5 13:18 30:2	forward 26:17	globally 22:5	handy 19:9
field 22:13	four 12:20 23:21 24:3	go 5:18 8:18 12:1 19:20 31:5 33:13	happening 23:6 23:9 24:5
fields 21:5	free 9:5 13:18 30:3,13 32:14	going 5:14 6:5 6:8,12 8:7,12 8:15 9:1,7 13:16 19:14 23:5,11 24:10 25:12,14 27:18 27:24 29:2 30:10 31:19	hard 29:16
final 19:11 32:21	fuel 14:20 15:1 25:6,7,21,24 26:6	good 19:7 20:1 27:10 30:6 31:21 32:1	hazardous 16:11,24
finally 32:2	fuels 25:19		health 29:9
financially 35:15 36:11	full 19:23		hear 24:16
find 7:8 8:24 22:9 23:2 33:2	further 19:4 31:5 35:13 36:9		hearing 1:1 2:3 4:13 5:2,6,12 5:20,21 6:19 6:23 8:4,6,22 8:23 9:4,13,19 10:3,5,6,8,15 10:18 11:17,24 12:5,8,18,21,23 13:3 14:1 16:1 17:17,18 18:8 18:12,15,18,21 19:7,22 29:18 29:21 30:2,15 30:23 32:6,11 33:3,5,10 34:6
fire 3:10,12,17 3:21 14:5,8,12 15:14,24 26:20 26:21 28:2,7 31:2	g		
fired 14:20,22 15:1	g 5:1 gact 15:3		

34:9,12,20 hearings 9:2,3 12:3 30:12,13 33:14,16 heidi 1:21 35:2 35:17 held 16:1 17:17 hello 6:20 help 21:23 22:19,22 24:24 25:11 26:12 29:13 helpful 29:19 helping 22:12 29:8 hereto 35:15 36:11 hey 28:4 highway 1:14 33:7 hill 22:20 hold 5:6 holiday 5:3 34:20 home 22:7,10 hood 2:9 hope 29:19 hopefully 24:6 horsepower 14:5 15:14 hour 14:19 15:5,16,19,22 hours 14:24 25:22	household 22:5 i icon 7:19 ideas 20:10 identification 19:2 identified 18:20,21 identify 29:12 ii 31:15 impacts 24:24 important 10:17 13:9 24:4 29:12 improved 22:21 improvements 24:17 improving 26:22 include 14:9 including 22:20 inclusion 8:12 10:3 incorporated 12:7 18:2 32:8 34:9 increase 20:19 27:8,10 indicated 7:16 info 23:7 informal 9:18 information 9:12,17,23 13:13 23:1,3,4	23:19,19 28:17 29:18 ingredients 21:23 install 26:23 installed 20:21 22:22 28:21 instructions 6:9 interest 29:20 interested 35:15 36:12 introductory 8:7 island 21:10 24:23 25:21 26:5 issue 13:5 issued 17:20 j jackson 2:6 6:6 6:17,20,21 january 15:15 jeanette 2:14 job 1:22 21:4 jobs 32:1 join 5:4 joined 6:2 joining 13:24 29:15 32:23 jordan 2:15 josh 2:5 3:4 19:16 20:1 29:21 30:7	journal 4:6 judgment 31:17 jump 24:15 jumping 22:15 june 3:13,15 15:18,20 junior 29:7 k keep 5:23 24:3 24:6 keeping 18:10 20:7 22:12 keeps 20:9 kind 8:8,13 9:18 21:16 24:7,10,15 25:13 29:12 kings 1:14 33:6 kits 29:8 know 5:10 22:7 22:9,13 23:6,6 24:12,15 28:4 28:24 29:2,15 30:24 knowledge 35:10 36:6 l land 28:16 landfill 14:21 14:23 21:10 24:23,23 25:20 26:5
--	--	--	--

lane 1:3 5:9 language 7:11 7:12,16,21,23 languages 7:2 7:13 larger 20:22 lastly 13:8 latest 25:11 law 9:1 33:13 leaders 24:1 learned 31:12 leave 10:20 23:10 27:18 legal 4:4,6,8 9:16 15:24 leisure 30:4 life 25:17 limitations 16:15,24 limited 11:15 12:4 14:24 line 23:4,7 24:8 lisa 1:8 2:3 5:11 6:18 8:5 13:21 list 2:2 30:19 listed 7:12,13 7:17 9:3 17:2 18:11 33:16 listen 23:10 listening 29:20 little 20:5 21:1 21:14 24:14 33:13 live 8:19 10:1 11:13,15 30:10	30:12 32:18 34:6 local 17:11 22:18 29:10 located 5:8 7:20 16:19 21:15 long 11:10,18 look 9:1 24:19 33:11,13,17,21 looking 20:9 28:8 32:22 looks 20:19 lot 21:24 24:19 28:24 low 26:11	10:20,24 20:9 22:4,8 30:6 34:14 making 10:13 30:20 34:10 mann 2:11 manufacture 21:22 manufacturing 32:1 marchildon 2:17 marked 18:23 19:2 marshlands 21:20 martin 2:7 3:5 30:17 31:3 matter 8:24 9:13 10:4,7,11 10:13,15 12:5 12:7,12 13:7 14:17 15:11 18:23 30:1 34:11 means 16:11 mechanism 34:13 media 34:1 meet 24:3 28:8 meeting 4:10 7:19 8:9 meetings 23:18 31:12	meets 26:16 28:2 member 31:6 members 9:21 11:7 20:13 memorandum 3:16,18 memorial 21:15 27:2 mention 31:5 33:23 mentioned 10:14 12:3 16:22 22:3 25:19 29:23 30:11 message 23:8 messaging 34:3 met 24:8 microphone 30:20 million 14:6,19 15:5,16,19,22 20:24 minor 16:10,23 minute 27:7,9 27:10 minutes 6:6 11:5,7,15 31:1 mnsr 15:3 model 24:21 moderated 1:8 monitoring 28:16
	m		
	made 10:10 13:9,10,13 24:1 magazine 20:15 mail 23:19 33:5 maintain 16:15 17:1 20:22 28:7 maintaining 27:16 maintenance 14:9 major 16:6,8 16:13,17,20 17:1 make 6:11,11 6:13,24 10:19		

<p>monoxide 14:15 15:9</p> <p>motors 28:3</p> <p>move 19:20</p> <p>moving 26:17</p> <p>multiple 7:2</p> <p>muted 6:16</p>	<p>news 4:5,6</p> <p>nfpa 28:2,6</p> <p>night 24:9</p> <p>nights 34:19</p> <p>nitrogen 14:14 15:7 16:8,20</p> <p>non 22:19</p> <p>noon 30:15,16</p> <p>notary 35:18</p> <p>note 8:20 10:2 10:16 13:9</p> <p>noted 14:7</p> <p>notice 4:4,6,8 4:11,12</p> <p>notification 23:20</p> <p>nox 26:10,11</p> <p>nsps 14:11 15:3</p> <p>number 12:3,9 12:15,20 13:8 14:10,20 15:1 15:2 18:5 22:19 23:8 31:10,14,16,18 31:22,23</p>	<p>34:16</p> <p>offered 8:17 11:4,13,17 32:17</p> <p>offering 30:4</p> <p>office 6:7,22 33:6</p> <p>officer 2:3 5:2 5:12 6:19,23 8:5,6 18:8,15 18:18 19:7,22 29:21 30:23 32:6 33:6 35:2</p> <p>officer's 13:3</p> <p>official 12:17</p> <p>oil 14:20 15:1 21:23 25:21,24 26:6</p> <p>okay 6:19 18:8 19:7,19 30:23</p> <p>okesola 2:10</p> <p>olayiwola 2:10</p> <p>old 25:6,9 33:5</p> <p>once 7:8,20 11:21 19:16</p> <p>ones 33:18,18</p> <p>open 12:13 29:1 32:24</p> <p>opening 30:11</p> <p>operate 24:18</p> <p>operating 16:7 17:23 18:3</p> <p>operation 15:1 16:15 17:24 18:1 31:14</p>	<p>operational 20:8</p> <p>operations 20:14 22:23 25:4 29:18</p> <p>operators 20:13,16</p> <p>opinion 25:23</p> <p>opposed 28:3</p> <p>options 7:10</p> <p>order 12:9 13:5 13:6</p> <p>organic 14:16 15:10 16:10,23</p> <p>organization 10:23</p> <p>outcome 35:16 36:12</p> <p>outside 20:18 29:4</p> <p>outstanding 20:18</p> <p>overall 26:14</p> <p>overview 17:3</p> <p>own 21:8</p> <p>oxide 16:20</p> <p>oxides 14:14,14 15:8,8 16:8</p>
<p>n</p>	<p>n 2:1 3:1,1 5:1 26:10</p> <p>name 5:10 6:20 13:22 22:5,6 30:19 31:3</p> <p>narcan 29:8</p> <p>national 28:2</p> <p>natural 14:20 14:21,23,23 25:20 26:1,3,4</p> <p>near 21:15</p> <p>need 8:2</p> <p>needed 25:3 27:5</p> <p>neighbor 20:10</p> <p>neighbors 24:2 29:16</p> <p>neither 35:11 36:7</p> <p>new 1:3 5:9 14:6 16:19 20:9 22:17 24:18,20,21 25:1,1,2,7,18 26:9,21 27:7 27:23 29:6,17 31:4</p>	<p>o</p> <p>o 3:1 5:1 26:10</p> <p>october 15:23</p> <p>offer 6:8 8:12 8:19 9:24,24 10:17 11:5,8 11:14,16 12:10 13:12,14 19:4 19:12 30:13 31:1 33:21</p>	<p>p</p> <p>p 1:5 2:1,1 5:1</p> <p>p.m. 1:10 34:21</p> <p>page 3:2,8 4:2 7:20 9:13 11:24 31:10 33:10</p>

parameters 6:4 8:8 9:15	14:10,19 15:2 15:14,15 16:2	platforms 34:1	prepared 36:3
part 28:6,16	16:3,7,15,24	please 6:15 19:15	prepares 6:1
participate 23:17	17:20,24 18:1 18:2,3 21:2	point 2:5 16:5 19:14 20:2,7	present 2:8,9 2:10,11,12,13 2:14,15,17,18 2:19
particular 9:20 15:11 17:17	24:18 25:5,9 26:18,22 27:12	23:2 27:14 30:9 31:24 32:16	presentation 4:14 8:11,16 8:21,21 13:2 18:5,9,21 19:8 19:9,13,18 29:22 30:1,8
particulate 14:17	28:12,14 31:10 31:10,13 32:3 32:5	pointed 25:22	presentations 9:8 11:21 29:10
parties 35:12 35:14 36:8,11	permits 5:8 8:14 10:8 14:7 17:13 20:3,4 24:17 28:10 29:5	pointing 7:9	presented 9:23 13:13 28:15,17
partner 22:18	permitted 14:8 14:22	points 25:15 26:1,4	previously 12:3 16:22 29:24
partnered 10:22	permitting 17:4	pollutants 16:11,14,24	primary 25:19
party 10:22	perry 2:16	popping 8:1	prior 10:13 11:10 17:22 34:10 35:5
pass 24:6	person 30:16 32:17	portion 11:4 30:10 32:18	proceeding 6:5 9:16 34:22 36:4
pathways 29:1	personnel 20:9	possibility 25:22	proceedings 5:13 12:13,16 19:10 30:9 35:3,5,6,9 36:6
paying 32:1	pertinent 12:7	post 32:12	process 13:6 17:4
pending 5:7 8:14 10:8 12:6 12:22 34:14	peter 2:17	posted 8:22 10:14 11:23 12:8,18 18:12	processes 22:21
pennsylvania 35:19	photo 20:20 24:19	posting 18:16	produced 21:9
people 19:12 20:6 22:2 23:10 24:6,11 29:2	physical 5:22	potential 16:12	
performed 17:8	place 9:24	power 25:6	
performing 20:13	plan 28:15	powered 27:11 28:1	
period 11:11 32:24	planning 30:4	powerpoint 13:19	
permit 1:6 3:10 3:11,20,22 12:22 14:2,4	plans 28:12	pre 8:19 10:1 11:2,4 13:14 30:14,17 32:17	
	plant 20:14	preferred 7:11 7:12,16,23	
	platform 5:6,23 7:1 9:22 13:12		

products 21:24 22:4,6,7,8 profits 22:19 program 16:7 project 11:23 14:4 17:10,12 28:23 31:7 promoting 29:5 proper 28:6 property 27:4 proposed 28:15 protection 28:2 28:7 protocols 5:21 12:2 30:11 proud 20:6 provide 5:5 9:22 provided 9:10 30:14 provides 34:12 pte 15:3 public 1:1 4:10 4:12,13 5:6 9:2 9:2,17,21 10:10 11:8,11 12:2 13:14 14:1 16:1,3 17:16,18 23:1 33:3,10,14,15 34:14,16 35:18 publicly 17:16 pump 28:22 pumps 3:10,12 3:17,21 14:5,8	14:12 15:14,24 26:20,21 27:8 27:11,21,23 purchased 21:11 purpose 9:19 12:20 purposely 26:7 purposes 18:10 27:10,15,21,22 pursuant 5:20 pursue 29:3 put 9:11 13:19 19:11 29:8 31:14	reasons 13:7 received 11:10 12:4,19 15:13 15:15,18,20 17:4 recently 20:15 recirculation 26:12 record 8:12 9:7 10:4,6 11:5,9 12:8,11,16,21 12:23 18:7,10 18:19,22 19:4 23:3 34:9 35:9 36:5 recorded 35:6 recording 35:8 36:4 recovered 25:21 reduce 24:22 24:24 reduced 21:12 26:15 35:7 referenced 13:2 reflect 18:19 regard 11:16 12:21 30:12 regarding 1:3 10:11 13:11 register 30:14 registered 8:19 10:1 11:2 13:14 30:17	registrant 11:4 registration 32:17 regular 24:4 regularly 23:18 regulated 31:20 regulations 26:17 28:9 rehash 30:6 related 10:7 11:23 35:11 36:7 relative 35:13 36:10 remainder 21:10 remains 12:13 remarks 8:8 30:11 remember 33:11 reminder 29:23 renewable 21:4 21:11 replace 25:6 31:13,15,22 replacement 25:10,13 31:7 replacing 24:20 25:16 report 13:3 reported 1:21 reporter 9:11 32:12
	q		
	qualified 35:7 quality 2:4 13:24 17:22 quarterly 31:12 question 28:4 questions 23:15 24:12		
	r		
	r 2:1 5:1 railroad 21:17 rather 12:13 19:18 read 31:9 ready 13:20 19:16 31:2 reason 25:5		

reporter's 12:17 32:8	25:14 33:3,20	season 5:3 34:20	settings 7:19,20
representatives 8:10	river 21:20	second 5:18 9:4 15:20 19:20	shahverdian 36:2,15
request 29:17	rose 22:20	26:19,23 27:3	shampoos 22:8
requested 17:16,18	route 23:17 28:15	secretary 5:11 6:8,22 10:12	share 13:18 17:3 19:15 22:24 23:18 29:18
requesting 28:11	routine 30:24	13:4,4 32:4 33:6 34:10	sheet 6:1
required 17:14 25:5,10,24 27:13	rowland 2:4 3:3 13:21,22 18:14,17 19:6	secretary's 12:11	sheets 5:22
requires 14:7	run 27:15,17 27:24	section 13:23 21:2	shipped 22:4
residential 24:2	s	see 7:4,5 9:6,8 9:8 18:5 19:21	shot 20:16
residents 29:12	s 2:1 3:1,7 4:1 5:1	21:19 22:6 24:12 25:16 26:17 27:1 33:9,20	show 7:4,5,8 8:2 28:20 31:23
resources 21:12	safe 22:12	seed 22:12	side 9:20 19:17 21:19
respond 23:16	safety 20:20 22:21 25:11 26:22	seeing 11:22	sign 5:22
responders 24:2	sana 2:8	seeking 24:17	signature 35:16 36:14
responsibility 22:16	saw 30:18	select 7:6,11,12 7:15,17,18,21 7:22,23 8:2,2	silvana 2:18
responsive 29:16	says 7:6,18 28:6 33:1,13	send 10:18 23:15	simply 13:12 31:17
returned 17:6	scheduled 17:19	senior 29:6	siren 23:20
review 13:5 15:12 30:6 32:14 34:10	schedules 5:3	sense 31:17	site 2:5 20:2,20 21:3,5,14,18 22:2,21 25:23 28:19 31:24
reviewed 13:4 17:5,10	schoentube 1:21 35:2,17	seriously 22:17	skills 35:10 36:6
revised 15:19	school 22:19	serve 5:12	slide 19:11 22:15 33:1
revision 15:21	schweitzer 2:13	services 29:9	slides 18:11 24:9
right 7:24 18:19 19:24 20:21 21:6,16	science 29:10	session 9:17	
	screen 7:4,15 13:19 19:15,23 32:21 33:9	set 6:4 8:8	
	screensharing 5:18		

smartphone 7:14 social 29:9 34:1 solar 21:5 solely 12:4 soon 9:9 12:18 32:11 sorry 6:17 25:2 sound 31:17 source 16:6,8 16:10,13,18,20 17:2 south 21:19 spanish 4:8 speak 5:22 30:17 speaker 2:7 special 17:13 specialist 2:6 6:7,22 specifically 10:7,18 sponsoring 29:9 standard 5:20 34:13 standardized 34:2 start 7:2 31:2 started 27:20 state 4:4,10 31:21 35:19 statutory 12:20 steam 21:8 25:3 31:16,18	steelworkers 20:15 22:3 stem 29:10 stop 5:18 26:3 store 27:4 stores 22:7 stuff 5:19 subject 10:7 12:4,7 16:6 submit 10:24 33:24 submitted 10:21 12:6 14:4,18 28:14 33:1 34:1 subsequent 11:17 successful 18:1 sulfur 14:14 15:8 summary 14:3 supplemental 11:9 supplies 22:9 supply 26:5 support 22:11 22:17 24:24 supporting 29:6 sure 6:11,13,24 10:19,20,24 30:20 34:14 surfactants 21:22	surround 21:21 surrounding 23:21 sustainability 21:3 24:24 sustainable 21:4 switch 26:6 sworn 35:5 synthetic 16:10 16:23 system 23:21 27:16 systems 23:20 t t 3:1,1,7 4:1 tab 9:1 33:13 table 16:17 take 6:15 19:9 23:12 26:2 33:10 taken 16:14 17:1 35:3,12 36:9 talk 19:11 20:2 21:1 26:19 talked 26:15,24 talking 20:23 talks 25:16 tanisha 2:16 tank 14:6,7 20:21,23,24 26:23 27:3 28:22	team 20:6,8,12 20:19 22:1 technical 3:16 3:18 17:5 20:8 technologies 25:12 technology 26:10,11 31:16 tell 20:5 terms 18:1 test 23:21 testifying 35:5 testing 14:9 27:16 text 34:2 thank 5:19 6:3 6:17 13:21,24 18:8 19:8,12 19:24 29:14,19 29:21 30:7 32:5,6,22 34:18 thanks 6:18 8:6 therefor 13:7 things 6:5,11 19:20 22:9 24:5,12 26:12 think 6:16 9:4 29:24 30:19 32:3 third 9:4 10:22 three 7:6,17 11:4,7,15 12:15 30:24
--	---	--	---

<p>threshold 16:8 thresholds 16:13,16,18 17:2 throat 5:15 time 5:2 6:3 9:24 10:6 18:24 19:5 25:18,18 34:19 timeline 15:13 timely 23:3 times 23:22 24:3 27:15 title 16:6 18:3 today 14:1 16:1 21:22 26:3 30:16 together 29:9 tonight 5:24 6:2,5,23 8:9,12 9:7,15 10:4,8 10:20 11:13,20 11:22 12:16,24 13:2,10,12 20:11 24:10,16 27:13 28:11 29:15 32:9 33:22 34:6 tonight's 5:12 9:19 12:5,13 12:21 19:10 tons 14:13,14 14:15,15,16 15:7,8,8,9,10 16:21</p>	<p>top 7:24 9:5 20:20 tour 28:19 track 5:23 21:18 transcriber 36:1 transcript 9:10 12:17,23 32:8 36:3,5 transcriptionist 35:8 translation 4:9 7:10,21 true 35:9 36:5 truly 27:19 try 22:24 26:7 trying 29:1,3 29:13 turn 6:5,13 8:4 8:15 13:16 27:18 29:20 30:10 turning 8:10 twitter 34:2 two 12:9 14:1,5 15:14 18:11 20:3 21:5 24:17 26:21 27:7,23 28:10 typewriting 35:7</p>	<p style="text-align: center;">u</p> <p>ultimately 13:5 ultra 26:11 under 9:2 understand 6:12 understanding 23:11 union 20:12,13 20:14 22:3 31:4 united 20:15 22:2 unlimited 14:22 unmuted 30:21 updated 3:12 3:14 updates 28:23 upgrade 25:18 upgrades 25:10 upper 21:16 url 33:9 use 6:13 14:8 14:22 17:13 22:1,10 24:22 25:7,23 26:8 27:5,6,20,21 28:4 used 21:24 22:5 25:6 27:12,23 uses 34:13 using 7:1,3 21:4 25:11 26:4 28:3 34:1</p>	<p>usps 33:5 usually 23:8 32:10</p> <p style="text-align: center;">v</p> <p>v 16:7 18:3 variety 9:12 33:23 verse 26:15 vest 1:8 2:3 5:11 8:5 virginia 2:6 6:6 6:8,15,16,21 8:6 30:19 virtual 5:5 virtually 5:21 5:24 volatile 14:16 15:10 16:10,23 volume 20:22 voluntarily 20:21 26:23 29:17 volunteering 29:7</p> <p style="text-align: center;">w</p> <p>walk 27:22 want 6:11,12 10:16,23 12:1 19:11 27:14 29:15 32:20 34:18 wanting 20:5 war 31:15</p>
---	--	---	---

waste 21:9 water 14:6,7 20:21,22 21:23 26:20,21,23 27:3,4,6,9,20 28:22 way 18:16 23:15 28:7 ways 20:9,19 21:12 22:18 33:23 34:7 we've 20:4,4 28:4,22 29:5 32:9 33:22 webpage 4:13 8:23 10:15 12:8,18 18:12 18:22 30:2 32:12 33:3,12 33:17 website 8:24 10:23 23:1 31:11 wednesday 1:9 5:4 week 32:10 weight 10:11 34:8 west 21:17 who've 6:2 wholly 26:22 willis 2:7 3:5 30:17,18,22,24 31:3,3 32:7	willis's 34:5 wish 30:3,13 34:16 wishes 12:10 19:4 wishing 9:24 10:17 witness 35:4 working 28:11 29:16 works 6:9 workshop 9:18 world 31:15 writing 11:9 33:1,24 34:7 written 11:16 12:24 32:3	
	x	
	x 3:7 4:1 26:10	
	y	
	year 14:13,14 14:15,16,17,24 15:7,8,9,9,10 16:21 23:22 24:3 31:8 years 31:24 yellow 21:18 youtube 34:2	
	z	
	zone 17:9 zoning 17:11 17:13 zoom 1:13 5:23 6:9 7:1	