



Valero pollution discharges -- don't let air pollution become water pollution

December 17, 2007

Secretary John Hughes

Delaware Department of Natural Resources and Environmental Conservation

89 Kings Hwy

Dover, DE 19901

Re: Valero City Refinery Coastal Zone application number 376SD

Dear Secretary Hughes,

DNREC is currently considering allowing Valero to capture 700 tons of nitrogen oxides yearly in their smokestack scrubber and then wash that residue into the Delaware River through its wastewater discharge. Allowing this process would result in an increased discharge of about 152 tons of nitrates to the Delaware Estuary each year. This increase in nutrient pollution to the Delaware Estuary is unacceptable and should not be allowed.

I recently attended a Delaware River Basin Commission meeting discussing the concerns about the effects that existent and increasing nutrient pollution may have/be having on Delaware Estuary and Bay ecosystems. At this joint meeting of the DRBC's Monitoring Advisory Committee and Water Quality Advisory Committee (of which I am an appointed member), the largest concern discussed is the reality that we don't in fact know what affect high nutrient inputs into the Delaware River system is having now and/or could have in the future. It is clear that the scientists have not given this issue the focused concern or research necessary to evaluate the affects, and have not been monitoring the appropriate endpoints to know the effects. In light of this tremendous deficit of information and the potential ramifications it might hold for our present or future, it is not at appropriate allow Valero to clean up its air discharges by further polluting its water discharges to the estuary.

In addition, the 2006 Delaware River and Bay Integrated List and Water Quality Assessment. Zone 5c of the Delaware Estuary was identified as not meeting DRBC's current water quality criterion for Dissolved Oxygen. Supporting additional nutrient pollution discharges to the estuary which could contribute to this pre-existing water quality violation and negative condition is not appropriate. Please do not allow Valero to reduce its air pollution by increasing its water pollution dumped into our shared river.

Sincerely,

Maya K. van Rossum

the Delaware Riverkeeper

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