

29 August 2019

Lisa Vest

Office of the Secretary DNREC

89 Kings Highway

Dover, DE 19901


I wish to enter my opposition to the proposed permit for Allen Harim, Harbeson, DE. They intend to send both chicken waste from their local plant as well as future "customer" waste to the Spray Facility. Milton does not want their waste.

Objections: They did no Health Impact Study

They have had 90 previous violations

Money for a state of the art treatment facility has been improperly moved to this antiquated spray field.

Do not allow Milton to be ruined as both Dagsboro and Millsboro have been


David E Park, property owner, taxpayer, voter

27 August 2019

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Nancy L Park, property owner, taxpayer, voter

September 8, 2019

Lisa Vest, Hearing Officer
Office of the Secretary
DNREC
89 Kings Highway
Dover, DE 19901

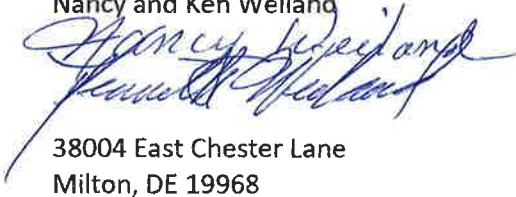
Dear Lisa/DNREC officials:

My husband and I are in opposition to the permitting of Allen Harim to treat up to 4 million gallons of waste water, per day on site, and also the permitting of Artesian to accept Allen Harim's waste and disposal of it, at the Artesian Northern Sussex Regional Reclamation Facility. First of all Allen Harim has a history of violations and has been fined accordingly, have they been paid? Why would you grant a permit to a company that has been polluting the Beaver Creek for the last couple of years and can't control the stench coming from that plant? We live in the Meadows of Beaver Creek and we have had repeated calls to DNREC over the last couple of years regarding the noise and smells from this plant. Nothing seems to have changed. We still have terrible odors and occasional noise! Now Allen Harim wants to generate 4 million gallons of wastewater per day and Artesian would take up to 2 million gallons per day, where does the additional 2 million gallons per day end up that Allen Harim will generate? Will they continue dumping in the already polluted Beaver Creek? Have water samples been taken and tested from this creek? We need well testing and impact studies around the Allen Harim plant and the Artesian Northern Sussex Regional Reclamation Facility prior to permitting these companies to discharge and spray this waste on fields. Now our understanding is this waste will be sprayed on fields with the uptake of crops planted, however, crops do not grow well in the winter and ground can freeze so uptake will diminish and thereby run off will occur if ground is frozen! When will DNREC start protecting and working for and with the concerned citizens in Sussex County?

I urge you to consider our concerns and let the people have a voice in this matter. If this permitting is granted to both Allen Harim and Artesian with no base lines in ground water, soil sampling or impact studies then you are walking in unknown territory! Any kind of pipe breaking, malfunction of any kind or oversaturation of this spray operation can jeopardize the people living near and around these facilities. Our health can be impacted as well as our home values. Do you want that for yourself? Water doesn't stay in one place, it travels. This state has had water problems for years, due to chicken farms and manufacturing. Isn't it about time we think of better ways to manufacture and farm without dumping it back into our already polluted ground water? Don't let \$\$\$\$\$ rule!

Thank you for your time and consideration!

Nancy and Ken Weiland



38004 East Chester Lane
Milton, DE 19968

From: DoNotReply@delaware.gov
To: [HearingComments, DNREC \(MailBox Resources\)](#); gravelhillfarms@hotmail.com
Subject: Public Hearing Comments
Date: Thursday, September 19, 2019 9:14:09 AM

Comments on Docket #2019-P-W-0016

Name: Dale Phillips
Phone: (302) 448-1285
Email Address: gravelhillfarms@hotmail.com
Organization: Sussex County Farm Bureau

Comments:

September 19, 2019 Docket #2019-P-W-0016 Comment to Public Hearing Officer, Lisa A. Vest, DNREC Office of the Secretary Sussex County Farm Bureau is the voice of 500 farmers and ranchers in Sussex County. Our mission is to promote and protect Delaware agriculture through education and advocacy to ensure a quality of life for farmers and ranchers and their consumers. Sussex County Farm Bureau supports Allen Harim Foods for its operation permit for an on-site wastewater treatment and disposal system to treat up to 4.0 MGD of poultry processing wastewater at the Allen Harim Harbeson Processing Facility. The treated wastewater effluent will be pumped via force main to the Artesian Northern Sussex Regional Water Reclamation Facility (ANSRWRF). Similarly, the Sussex County Farm Bureau supports Artesian Wastewater Management, Inc., application for a spray irrigation operation permit to receive treated wastewater effluent for storage, in a synthetically lined lagoon, and disposal, via spray irrigation at the Artesian Northern Sussex Regional Water Reclamation Facility (ANSRWRF). Sussex County farmers have consistently helped all citizens of Sussex County by providing an outlet for treated wastewater by irrigation on non-human consumed crops under DNREC regulations. Respectfully submitted, Dale Phillips President, Sussex County Farm Bureau

From: DoNotReply@delaware.gov
To: [HearingComments, DNREC \(MailBox Resources\)](#)
Subject: Public Hearing Comments
Date: Friday, September 20, 2019 3:35:40 PM

Comments on Docket #2019-P-W-0016

Name: Joann Hughes
Phone: 9736157094
Email Address: joannkotthughes@gmail.com
Organization: Citizen of Sussex County Delaware

Comments:

To Whom it may concern, First, I would like to thank you for the good works that the DNREC does to protect our air, water and much more so that the residents of Delaware can enjoy a safe and clean environment. In this correspondence I wish to address a current topic which directly effects our well-being: the Allen Harim/Artesian proposed plan for waste treatment. I am sure that you are aware of The Poultry Pact of 2011, a collaboration between state agencies and major poultry executives; “an important step in our journey to a cleaner environment and growing economy” for the state of DE. (Senator Thomas R. Carper) ‘Under the agreement, poultry companies will educate growers about better plans for nutrient management; research environmentally friendly uses for poultry litter and manure; help growers locate options for safe and appropriate waste disposal; research strategies for nutrient reduction including new feed ingredients; and help growers meet certification requirements under the Delaware Nutrient Management Program.’ The Allen Harim/Artesian’s proposed plan goes against this pact. As a citizen of Sussex County I have a concern for the purity of our aquifer and quality of our well water as it effects public health and our environment. As an American I object to the consequences should the plan be accepted as it will set precedent and serve as a corrupt model for the poultry industry and beyond. Please support the citizens and taxpayers and resolve this issue in a way that assures safe and appropriate waste treatment and disposal. We are counting on you to do the right thing for our future and our children’s future. Thank you.
Sincerely, Robert and Joann Hughes

From: [Keith Steck](#)
To: [Vest, Lisa A. \(DNREC\)](#); [Vest, Lisa A. \(DNREC\)](#)
Subject: Comments on Joint Hearing on Harim and Artesian Permit Applications
Date: Friday, September 20, 2019 2:32:49 PM
Attachments: [Sept 20 2019 Comments for DNREC Hearing on Harim and Artesian.pdf](#)

Hi Ms. Vest

Attached are my comments to supplement my public statement at the Aug. 21 hearing in Milton. I understand the record is open through this afternoon. Please let me know you received and can open the attached file.

BTW, I used both email addresses as I was not sure which is the correct one. I believe it is the [@delaware.gov](mailto:delaware.gov) but am not quite sure.

Regards,
Keith Steck

Steck Sept 2019 Comments for DNREC Hearing on
Allen Harim at Harbeson and Artesian Facility at Milton

These are supplemental comments to my public comments at the August hearing in Milton. Comments about the various documents appear first followed by comments about each draft permit and are labeled as such. I appreciate the extended time to review the draft permits.

There is a fundamental operational question that has not been addressed to date and is not being addressed in these documents: What happens when the Artesian lagoon reaches full capacity and conditions do not allow spraying or it cannot otherwise accept Harim wastewater due to lagoon damage? There are additional related operational questions that also have not been discussed:

1. What are the plans for handling Harim's wastewater coming to the Artesian Milton facility when the lagoon is full?
2. Does DNREC declare an emergency or otherwise override controls and practices and allow Artesian to spray or other discharge the lagoon wastewater to make more room for Harim's incoming wastewater?
3. Do operational plans prohibit Artesian from accepting the Harim Harbeson wastewater?
4. Do operational plans require Harim Harbeson to stop sending water to the Artesian lagoon and discharge the wastewater into the Beaverdam Creek... or Artesian's sewage treatment plant?
5. Does Harim Harbeson cease sending wastewater to the Artesian facility in Milton and shut down operations so as not to produce wastewater than Artesian cannot take in?

Equally important was the need for the public to have access to two critical documents, which were not included in the public notice. The first document is crucial to understanding the agreement between these companies, including what the actual

operational agreement is supposed to be. This document is between Allen Harim and Artesian Wastewater regarding their agreements and was required by the instructions for the pipeline construction application. The second document contains details about what DNREC required of Artesian during its design and essentially serves as the roadmap to the facility that Artesian was to build north of Milton--Artesian's Amended Design Development Report.

Further, there is extremely little information about contingency operations in the Harim documents. While the Harim Harbeson Operation and Maintenance Plan briefly mentions contingency plans in the event of severe weather (page 59) the overall Harim Harbeson facility, there is no contingency and safety plan for how the connections between Harim and the Artesian facilities will be monitored and operated during severe weather, in the event of a natural disaster, and in case of an operational and/or structural malfunction or failure such as a vehicle accident affecting the connection. This contingency/safety plan should further include plans for contacting both Harim and Artesian officials, Harbeson town and other local and state officials, emergency responders, and environmental, HAZMAT, and other clean-up companies, as well as a list of these individuals and 24-hour contact information.

Comments regarding Allen Harim's Operation

- Key documents are missing. There are no documents pertaining to the actual physical CONNECTIONS between the Harim Harbeson facility and the two Artesian pipelines--the one going to the Milton facility and the Harbeson wastewater treatment plant. Specifically, there is no design document of the actual connections. There is no detailed operational and maintenance plan with respect to the connections, including physical inspection and monitoring, and who has responsibilities for the various operational aspects.

- Many documents provided are missing key information, including key operations related to the Artesian pipelines to Milton and the Harbeson sewage treatment plant, operational responsibilities, and personnel. For example,
 - The “as built” drawing of the Harim Harbeson facility, for example, DOES NOT INCLUDE THE ACTUAL FORCEMAIN/ PIPELINE, just lines indicating the PROPOSED PIPELINE. It is entitled FORCEMAIN PIPING PLAN and dated Jan. 11, 2017, and has a red “RECORD DRAWING” stamp and signature of Daniel Konstanski, who is Artesian’s chief engineer for the Milton facility on March 3, 2019. Despite this stamp, THIS PLAN IS NOT CURRENT!
 - Further, only one of the 17 Harim documents describe or provide details about the connections the Artesian’s forcemain to Milton and its wastewater treatment plant in Harbeson--that is the Operation and Maintenance Plan.¹ Without information about the actual forcemain connection, there is no way anyone in the public can comment on the operations. For example, because there is no description about who is operational responsibilities with respect to monitoring the connections--someone at Harim or someone at Artesian or both--how are members of the public to know what are the monitoring, physical inspection, and operational functions and who has these responsibilities?
 - Facility Construction Plans Parts 1, 2, and 3 are, respectively, copies of the Harim Phase I Wastewater Treatment System Upgrade and Expansion drawings dated January 2016; mechanical, electrical, concrete and other drawings dated Sept. 2015; and other construction drawings and schedules dated Sept. 2015 and Jan. 2016. These are not accurate

¹ Only the Metering and Monitoring Building drawing notes a relationship to the facilities but does not explain the relationship or describe the connections.

because they make no reference to nor do they include drawings of the onsite forcemain that is supposed to tie into the Artesian forcemains to the Milton facility or to its sewage treatment plant behind the community of the Meadows at Beaver Creek. Moreover, labeling these documents “Construction Plans” are misleading because they provide no detailed descriptions of actual plans, materials, and other details of the construction that was to take place.

- The November 2015 design summary of the Harbeson Wastewater Treatment System Upgrade and Expansion plan covering phase II are inaccurate. For example, Phase II was not completed, according to the Water Infrastructure Advisory Council’s Dec. 7, 2016, minutes which discussed a “change of scope” and plans to divert process wastewater to Artesian’s facility north of Milton and sanitary wastewater, which includes sewage, to Artesian’s Harbeson sewage treatment plant, which is behind the community of the Meadows of Beaver Creek. In addition the summary does not include any reference to or description about tying into the two Artesian pipelines (to Milton and the Harbeson sewage treatment plant), the plan does not discuss accepting and treating processing and sanitary wastewater from Harim’s Millsboro deboning facility--the old Pinnacle plant--or Harim’s Dagsboro hatchery.
- The Harim Harbeson WWTP schematic--Appendix A to the Operations and Management Plan is largely invisible; only page 3 can be opened. Therefore it’s impossible to see and analyze this document and the information contained in that document.
- There is very little in the operation and maintenance plan about the composition of the wastewater being treated at the Harim Harbeson facility, especially

regarding the composition of wastewater transported from the Harim Dagsboro hatchery and the Harim deboning operation in Millsboro. In fact, the description of these two sources are vague and inconsistent. For example, in section 1.8 “Outside Flow Streams”--references to “sanitation water” and “sanitation wastewater” do not explain what is in this water, but DNREC defines this to include sewage and prohibits the hauling on non-sanitary wastewater to be hauled from the old Pinnacle facility in Millsboro to Harbeson in its nonhazardous wastewater hauling permit (condition 1e., Permit DE OH-601, amended in Sept. 4, 2018 per DNREC secretary order 2018-W-0050). Further, the O&M plan disagrees on the volume of Millsboro wastewater, citing 30,000 gallons per day on page 5 and 50,000 gallons per day on page 10. that this transferring the wastewater to the Artesian forcemain/pipeline. The plan needs to be updated to reflect that sanitary wastewater is not to be hauled from in from Millsboro and it should include a detailed explanation of the transfer, including detailed steps/actions to be taken, who takes those steps, and any contingencies should there be a malfunction and a backup process should the pipeline malfunction, breakdown, stop, or if something within the Harim facility requires stopping the transfer and diverting the waste stream back to the discharge operation into Beaverdam Creek.

- There’s nothing in the first or latest draft Artesian permit to reflect that Harim Harbeson plant accepts processing and sanitary wastewater from its Dagsboro hatchery and Millsboro deboning operations. More significantly, there’s nothing in the NPDES permit that reflects these other sources and their impact on the permit and discharges, especially the waste streams to the Artesian pipelines to Milton facility and the Artesian Harbeson sewage treatment plant.

In addition, there are questions regarding records and reports. For example, are monitoring records, test results, and other key information recorded electronically? The

operations manual seems to describe PAPER documentation, especially testing results. Why is Harim not documenting information electronically? Further, there's no mention of any kind of backup system to ensure information is secured, especially in case of destruction of original/source documents. This backup system should be electronic.

Comments regarding Artesian's Facility and DNREC's Handling

- Why has DNREC allowed parcel 235.6.11.01 to be included in the design and plans for the forcemain, given it has never been approved by Sussex County for this project? This parcel runs parallel to Rte 30 just above the intersection with Reynolds Pond Road and is designated part of spray field E, despite not having included in the list of parcels approved by Sussex County ordinance 1923 and Conditional Use 1725, which were approved in July 31, 2007. In fact, this issue was identified in the May 5, 2017, Amended Design Development Report for the Artesian project on a number of pages. Further, the project engineer acknowledged to me at a public meeting about this project last winter that this was still this case and I have found no public documents saying this parcel has been approved for this project.
 - So, given this parcel has never been approved for this project, why did DNREC allow Artesian to incorporate the parcel into its plans and designs? Why has DNREC not required the removal of it from the designs, calculations, and other aspects of this project?
 - More importantly, Designs and plans for the construction of the forcemain should not be allowed through this parcel, which runs runs right along Rte 30 north of the Reynolds Pond Road intersection. This parcel should be excluded from project documents, designs, and calculations and they should be revised accordingly.

- Cynics might say no one is going to remove this parcel from this project, the County is not going to act, and everyone is just going to keep quiet and the project will move forward without any action. This is another example of DNREC failing to ensure compliance with requirements.
- What should be driving the level spray irrigation is the needs of the plants, not the need to dispose of wastewater. Sussex County's ordinance and approved conditional use of this project, specifically states in Condition 6 : "The irrigation rates shall be determined by crop utilization and uptake limits RATHER THAN BY WASTEWATER DISPOSAL NEEDS [emphasis added]."
- Practically everything I have seen, read, and heard is the opposite--the emphasis is on disposing of wastewater. As a reminder, Artesian has built this for its sole customer--Allen Harim Foods in Harbeson--as a means for handling its treated wastewater. Further, the title of Artesian's company and facility names says it all--ARTESIAN WASTEWATER MANAGEMENT... and NORTHERN SUSSEX REGIONAL WATER RECHARGE FACILITY. I DON'T HEAR IT CALLED ARTESIAN IRRIGATION FACILITY.
- That said, from the design plans, volume calculations, and other documents, etc. everything seems to be geared toward getting rid of the wastewater. How is DNREC ensuring the forcemain and irrigation designs, including irrigation calculations, the irrigation plans don't drown the plants or reduce crop production? My understanding is that crop production has actually gone DOWN over at the Rehoboth spray irrigation operation. If crop production decreases, does that jeopardize agricultural preservation payments to the land owners? So, again, what design features have been incorporated into the forcemain/irrigation systems to ensure compliance with the approved conditional use?

DRAFT ARTESIAN PERMIT ISSUES/POINTS

Below are comments regarding the draft permit.

- The draft permit does not mention and it's unclear whether the facility will employ re-chlorination equipment for algae control. If such equipment will be used, this needs to be discussed in the permit.
- The facility is now called the Sussex Regional Recharge Facility (SRRF) and recognized by DNREC as such, so the permit should reflect this name. For clarification purposes, the permit can make reference to ANSRWRF by noting this is the former name of the facility.
- Part I B. Influent Limitations should clarify that wastewater will be coming from the Dagsboro hatchery and the deboning operation in Millsboro and may contain sanitary wastewater. It's misleading not to inform the public that the Harim facility is receiving and processing such wastewater.
- Part I C. Sprayed Effluent Limitations. The discussion of fecal coliform in the draft permit, particularly in subpart 14. is inconsistent with the draft Harim permit. The Harim Harbeson permit states that fecal coliform concentration **shall not exceed 20 col/100ml at any time, but the Artesian draft permit Daily Permissible Average Concentrations.** Shouldn't these permits be consistent?
- Part I H. Facility Specific Conditions
 - 1.b. Mosquito control needs to be discussed in detail, such as chemical application or whether aeration will be used, which was discussed in Response 5 of Artesian's Aug. 18, 2017, Amended Design Development Report for Phase I. While that report pertained to design and construction

of the facility, much of the information and responses are still relevant to facility operations.

- 2. Which pertains to compliance with Sussex County ordinances and conditional use requirements. This should specifically highlight Condition 6 of Sussex County ordinance 1923 and Conditional Use 1725 approved on July 31, 2007, which states: “THE IRRIGATION RATES SHALL BE DETERMINED BY CROP UTILIZATION AND UPTAKE LIMITS RATHER THAN BY WASTEWATER DISPOSAL NEEDS [emphasis added].”
- Part II. A MONITORING REQUIREMENTS. Subparts 1. INFLUENT MONITORING REQUIREMENTS, 2. SPRAYED EFFLUENT MONITORING REQUIREMENTS, AND 3. GROUNDWATER MONITORING REQUIREMENTS should include testing for lead and much more frequently than annually as required under subpart 2, given the increasing awareness of harm from lead exposure in medical literature and contamination in Flint, Michigan, and Newark, New Jersey, and the cumulative nature of lead exposure. Because of the known harmful effects of lead exposure, the proximity of spray fields to drinking wells, and that other parameters are tested twice monthly or monthly, Artesian should be the frequency of testing.
- Part III OPERATIONAL REQUIREMENTS
- My understanding is that there are wind restrictions for spray irrigation operation. If that is the case, these need to be added to the permit.
- Subpart 2. Facilities Operations is vague regarding the Artesian infrastructure with respect to its pipelines and related equipment. In particular, there is no discussion pertaining to Artesian's pipeline infrastructure between the Harim Harbeson site and the Milton facility. If the draft Artesian permit for the Milton facility is responsible, it should reflect that and if the Harim Harbeson facility is responsible, that draft permit should discuss it. If the responsibility for that

infrastructure is shared, both permits need to clarify which facility has responsibility for what infrastructure.

- Subpart 3 regarding spray irrigation and Subpart 3.e. pertaining to crops needs to reflect special attention to "the wooded portions" noted by Artesian's response 21 in its August 18, 2017, addendum to the Amended Design Development Report.
- The draft permit also needs to reflect other issues raised by the August 18, 2017, document. If they are not appropriate to the Artesian permit, then the Harim permit should address them.
 - 15.a. Regarding Automatic Flow Diversion
 - 19. Emergency Contingency Plan--all subparts.

COMMENTS ON HARIM DRAFT PERMIT

- Under Part 1 A. General Description (page 5), the Harim permit says that the treated effluent will be sent via forcemain to the Artesian facility and sprayed per State Permit 359288-02. However, it's unclear what permit this is--is the the draft Artesian permit?
- Under Part 1 B. Influent Limitations (p. 5), the average Harbeson limit was 2M gals per day, the maximum limit from Millsboro deboning was 40,000 gpd, and the maximum limit from Dagsboro was 40,000 gpd. There is no discussion about what monitoring is to be done to ensure compliance and no exceedance takes place.
- Under Part 1 C. Effluent Limitations (p. 5), there are inconsistencies between this permit and the draft Artesian permit.

- The average effluent flow from Harbeson to Artesian Milton was not to exceed 1.5M gpd averaged over a 7-day period and not to exceed a maximum of 2M gpd.
 - Fecal coliform concentration not to exceed 20 col/100ml at any time. The Artesian permit states **Daily Permissible Average Concentrations** in Part I C. Sprayed Effluent Limitations subpart 14.
 - The total residual chlorine concentration was not to BE LESS THAN 1.0 mg/L and not MORE THAN 4.0 mg/L at any time.
- Part I. M. Schedule of Compliance
 - a.ii. Within 30 days of the issuance of operational permits for both the Harim Harbeson and Artesian Milton facilities, Harim at Harbeson will seal Outfall 001 and terminate NPDES permit DE0000299.
 1. Within 15 days of the issuance of the operational permits of both facilities, Harim will cease stream discharge and schedule to closure of Outfall 001.

This subpart raises questions about how Harim Harbeson will handle discharging wastewater should the Artesian facility reach capacity, fail, or otherwise shutdown, especially if it terminates the NPDES permit. If Harim terminates the permit and Artesian cannot accept Harim's wastewater, will Harim have to shutdown or will it discharge untreated wastewater into Beaverdam Creek?

From: DoNotReply@delaware.gov
To: [HearingComments, DNREC \(MailBox Resources\); mariap@sraproject.org](#)
Subject: Public Hearing Comments
Date: Friday, September 20, 2019 11:49:02 AM
Attachments: [Kristl-2019-P-W-0016-Public Comment 2 \(1\).pdf](#)

Comments on Docket #2019-P-W-0016

Name: Maria Payan
Phone: 7178267286
Email Address: mariap@sraproject.org
Organization: Socially Responsible Agricultural Project, Sussex Health and Environmental Network

Comments:
I agree with these comments-attached file

From: DoNotReply@delaware.gov
To: [HearingComments, DNREC \(MailBox Resources\); mdicus29@gmail.com](#)
Subject: Public Hearing Comments
Date: Friday, August 23, 2019 12:55:18 PM

Comments on Docket #2019-P-W-0016

Name: Mary Jane Dicus
Phone: 918-805-9379
Email Address: mdicus29@gmail.com
Organization: No

Comments:

I am a new resident at Meadows of Beaver Creek. I did not know anything about this project slated to impact Milton. I have grave concerns regarding this due to the potential to contaminate ground water and drinking water. I would ask that more discussion, more study and more time be given to public discussion before this project is implemented and our water is contaminated. Had I know about this, I would have reconsidered my decision to move to Milton. Please remember that all life is dependent on sources of clean drinking water. Also remember that you cannot drink the money made by corporate interests involved in this project.

From: DoNotReply@delaware.gov
To: [HearingComments, DNREC \(MailBox Resources\); mmcgeever@si.rr.com](#)
Subject: Public Hearing Comments
Date: Monday, August 5, 2019 2:02:34 PM

Comments on Docket #2019-P-W-0016

Name: Maureen McGeever
Phone: 347-964-2380
Email Address: mmcgeever@si.rr.com
Organization:

Comments:

I am really concerned that spraying wastewater on farm fields could lead to well contamination and other health and environmental issues. I am a vegan and the thought of fresh farm vegetables being sprayed with wastewater from a poultry processing plant is really unimaginable to me. These chickens are raised and slaughtered under such unsanitary deplorable conditions, it is inexcusable to think that runoff could be in our drinking water.

From: DoNotReply@delaware.gov
To: [HearingComments, DNREC \(MailBox Resources\); mslower57@earthlink.net](#)
Subject: Public Hearing Comments
Date: Saturday, August 24, 2019 9:32:40 AM

Comments on Docket #2019-P-W-0016

Name: Michael Cunningham
Phone:
Email Address: mslower57@earthlink.net
Organization: No

Comments:

Dear Public Hearing Officer, I will not try and pretend I know anything about wastewater management. But DNREC seems to be setting themselves up for being unable to determine who would be responsible for a spill/groundwater contamination situation at this proposed site since it will be right next door to the Clean Delaware site that has already had issues with groundwater contamination. So there will be plenty of finger pointing, saying it's the business next door causing the problem and DNREC will say they can't determine who is responsible. Seems like a win/win/win/lose for HarimArtesian/Clean Delaware/DNREC/citizens. Everybody will be off the hook and we citizens will be drinking contaminated ground water from our wells. So the proposed site for this project should most definitely be moved elsewhere in my opinion. Sincerely, Michael Cunningham Milton

From: DoNotReply@delaware.gov
To: [HearingComments, DNREC \(MailBox Resources\)](#); bdjoseph1@verizon.net
Subject: Public Hearing Comments
Date: Wednesday, August 28, 2019 11:26:43 AM

Comments on Docket #2019-P-W-0016

Name: Robert and Delia Joseph
Phone: 302-664-1923
Email Address: bdjoseph1@verizon.net
Organization: no

Comments:

We are appalled that the necessary agencies that should be protecting the citizens allow this! The potential long-term harm has not been eliminated with the volume of output of wastewater as it is double the capacity of what Artesian is applying to process. Before proceeding we need to know the true impact of this decision. Bob and Delia Joseph Milton Resident

From: [Joann Hughes](#)
To: [HearingComments, DNREC \(MailBox Resources\)](#)
Subject: Opposition to Allen Harim/Artesian proposed plan
Date: Friday, September 20, 2019 3:33:21 PM

To Whom it may concern,

First, I would like to thank you for the good works that the DNREC does to protect our air, water and much more so that the residents of Delaware can enjoy a safe and clean environment.

In this correspondence I wish to address a current topic which directly effects our well-being: the Allen Harim/Artesian proposed plan for waste treatment.

I am sure that you are aware of The Poultry Pact of 2011, a collaboration between state agencies and major poultry executives; “an important step in our journey to a cleaner environment and growing economy” for the state of DE. (Senator Thomas R. Carper)

‘Under the agreement, poultry companies will educate growers about better plans for nutrient management; research environmentally friendly uses for poultry litter and manure; help growers locate options for safe and appropriate waste disposal; research strategies for nutrient reduction including new feed ingredients; and help growers meet certification requirements under the Delaware Nutrient Management Program.’

The Allen Harim/Artesian’s proposed plan goes against this pact.

As a citizen of Sussex County I have a **concern for the purity of our aquifer and quality of our well water** as it effects public health and our environment. As an American **I object to the consequences** should the plan be accepted as it will set precedent and serve as a corrupt model for the poultry industry and beyond.

Please **support the citizens** and taxpayers and resolve this issue in a way that assures safe and appropriate waste treatment and disposal. We are counting on you to **do the right thing for our future and our children’s future.**

Thank you.

Sincerely,

Robert and Joann Hughes

Sent from my iPad

From: DoNotReply@delaware.gov
To: [HearingComments, DNREC \(MailBox Resources\)](#)
Subject: Public Hearing Comments
Date: Tuesday, August 27, 2019 2:38:42 PM

Comments on Docket #2019-P-W-0016

Name: ruth rozum
Phone: 973-876-4233
Email Address: ruthrn188@aol.com
Organization: no

Comments:

I agree with the comments made by Andrea Green and Jeff Horn in the Cape Gazette News on Aug.27,2019. Allen Harim/Artesian should not be granted permits to further pollute the water of Milton.

From: DoNotReply@delaware.gov
To: [HearingComments, DNREC \(MailBox Resources\)](#); terryfoyle@hotmail.com
Subject: Public Hearing Comments
Date: Friday, August 23, 2019 1:35:07 PM

Comments on Docket #2019-P-W-0016

Name: Terrance J. Foyle
Phone: 3023299349
Email Address: terryfoyle@hotmail.com
Organization: No

Comments:

I have been a homeowner in Milton for almost 8 years. I live at 108 Arch St. in the Heritage Creek development. My wife and I chose Milton for it's quiet small town feel, and existing infrastructure such as city water and sewers. Since we rely on town wells, this spray irrigation project risks polluting an entire town water supply. Where are the lessons learned from the Mountaineer debacle a few years back? Surely there must be safer and more technically advanced ways to treat and dispose of this waste water than dispersing it over the aquifer an entire town depends on. If this project goes thru, and problems are created for residents, DENREC will be held responsible along with Allen-Harim. Terrance J. Foyle Milton