

**Clean Delaware, LLC**  
**P.O. Box 123**  
**Milton, DE 19968**

August 7, 2019

Mr. Brian Churchill  
DNREC- Division of Water Resources  
89 Kings Highway  
Dover, DE 19901

Dear Brian,

I'm writing to request several amendments to the Clean Delaware, LLC Agricultural Utilization Permit AGU 1702-S-03 and items to be included as an addendum to our 2016 Project Development Report.

- 1.) We request, with DNREC's discretion, to convert our land application fields "Milton 1" and "Milton 4" to potential septage supernatant spray irrigation fields. We would utilize the same cropping and application methods as described in our 2016 Project Development Report for field Milton 2.
- 2.) Milton 2 would be available for land application field rotation and then also back into our septage supernatant field rotation, when needed. Our certified nutrient management consultant has advised us that rotating the septage supernatant spray fields are important to sustain our farming operation including but not limited to promoting healthier soils and better yields. Increasing the acreage of spray activity will also help us with best management practices.
- 3.) We would like the testing frequency of the waste products we receive reduced to Quarterly for nutrients and Every Five Years for metals. Clean Delaware's sampling frequency is not in line with all other facilities and land application permits in Delaware that handle the same non sanitary waste products.
- 4.) In an effort to preserve the soil structure of the lands applied with non sanitary waste, we would like to apply, without incorporation, those products that pose no vector attraction issue. Direct injection is still available should we determine a vector attraction or odor issue could potentially exist. Vegetable processing waste, grease trap waste and Brewery waste specifically, could be sprayed on a cover crop. Currently, other land application permits issued by the state do not require incorporation for similar products. We believe several issues addressed in a Notice of Violation from 2017 would have been avoided if we were applying above ground and on a cover crop, over portions of fields and instead of plowing these products into the ground. Nutrient reclamation and runoff would also benefit from this practice.

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- 5.) As a best practice to evenly apply the various materials we receive, i.e. brewery waste, grease, misc. and other bio-solids, we feel there is a benefit to mixing these products prior to land application. Currently we have the ability to store material in any of three 25,000 gallon frac tanks on site. With this storage capacity, and an understanding of scheduled materials coming to our yard, a mixing rate can be adjusted to consider the volume of gallons to evenly apply and cover a specific area of our field currently under land application. This practice will give us a consistent product to apply across an entire field at one time regardless of individual nutrient content.

Mixing would be accomplished by blowing compressed air from our land application wagon into the bottom of an individual frac tank for up to 10 minutes noting the change to a consistent color at the top hatch of the tank. The same equipment would then vacuum suck the product into it's vessel to be land applied.

- 6.) Per a survey performed by Scaled Engineering dated March 2019, please consider revising application acreage on our Milton Farm as follows:

Field 1; 25.21 Acres for land application  
Field 2: 28.08 Acres for land application  
Field 3: 26.20 Acres for land application  
Field 4: 25.72 Acres for land application  
Field 5: 19.74 Acres for land application  
Field 6: no change  
Field 7: no change

- 7.) Per a survey performed by Scaled Engineering dated March 2019, please consider revising acreage for septage supernatant spray fields on our Milton Farm as follows:

Field 1; 23.40 Acres for land application on lines 5, 6, 7 and 8  
Field 2: 25.07 Acres for land application on lines 1, 2, 3 and 4  
Field 4: 21.76 Acres for land application on lines 9, 10, 11, 12 and 13

Please contact me for additional information.

Thanks for your attention,

Gerry Desmond  
Clean Delaware, LLC