

**In The Matter Of:**  
*DNREC - NaturaLawn America*  
*Surface Water*

---

*Transcript of Proceedings*  
*November 13, 2019*

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DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENTAL CONTROL  
OF THE STATE OF DELAWARE  
SURFACE WATER DISCHARGES SECTION

RE: NaturaLawn of America  
Application for a Distribution  
and Marketing Permit for the  
Distribution and Marketing of Class  
A/Exceptional Quality Biosolids  
Fertilizer Products throughout the  
State of Delaware.

.. . . . .

DNREC Richardson & Robbins Building  
89 Kings Highway  
Dover, Delaware 19901

Wednesday, November 13, 2019  
6:49 p.m.

.. . . . .

BEFORE:  
Theresa Newman, Hearing Officer

-- Transcript of Proceedings --

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1 MS. NEWMAN: Again, before we start  
2 the hearing, if everybody can sign in,  
3 because I will need to use the sign-in sheets  
4 for public comment.

5 Even if you don't want to make a  
6 comment, I will still need you to sign in for  
7 our record.

8 So I will give you a few minutes to  
9 do that.

10 (Sign-ins)

11 MS. NEWMAN: We are going to go  
12 ahead and get started. Please allow the  
13 record to reflect the time is now 6:52 on  
14 Wednesday, November 13, 2019.

15 I want to thank you all for taking  
16 the time out of your busy schedules to be  
17 here today.

18 We are here this evening to provide  
19 a formal platform for the State of Delaware  
20 Department of Natural Resources and  
21 Environmental Control to receive public  
22 comment on an application submitted by  
23 NaturaLawn of America for a distribution and  
24 marketing permit for the distribution and



1 marketing of Class A exceptional quality  
2 biosolids fertilizer products throughout the  
3 State of Delaware.

4 My name is Theresa Newman, and  
5 Secretary Garvin has appointed me to serve as  
6 the hearing officer for tonight's formal  
7 proceeding.

8 I would like to address for the  
9 record that the public meeting for tonight's  
10 hearing is separate, and any comments made  
11 during the public meeting are not a part of  
12 the public hearing and will bear no weight for  
13 the record of this hearing unless provided  
14 again during the public comment period  
15 towards the end of this hearing.

16 In addition, this hearing will  
17 require all members of the public who plan to  
18 attend the hearing to please sign in on the  
19 formal sign-in sheets marked as the DNREC  
20 public hearing for this proceeding, which is  
21 located at the front of the room.

22 This is a separate sign-in sheet  
23 from the public meeting that was just held  
24 and is required to be completed, as well.



1           If you haven't already -- and I  
2 think most of you have -- but if you need to,  
3 please sign in and mark whether you would  
4 like to provide comment.

5           The persons wishing to offer formal  
6 comment for the record will be given an  
7 opportunity to do so following the brief  
8 presentation given by the Department and the  
9 applicant, and will be recognized by the  
10 hearing officer accordingly at that time.

11           Even if you do not wish to offer  
12 comment, it's important that we have an  
13 accurate record of attendance at tonight's  
14 hearing; so, again, I would ask you to please  
15 sign in if you haven't already done so.

16           At the conclusion of these  
17 introductory remarks, I will be turning the  
18 hearing over to the Department's Division of  
19 Water staff, who will be making a formal  
20 presentation to help everyone understand the  
21 scope of tonight's hearing, specifically the  
22 permit application currently before the  
23 Secretary in this matter.

24           There will then be a brief



1 presentation from the applicant's  
2 representatives.

3 Following the presentations, we  
4 will then accept comment for the record from  
5 those tonight who have indicated the desire  
6 to do so.

7 The order of the commentators will  
8 be given directly from the sign-in sheets in  
9 no particular order. Again, please sign in  
10 if you haven't already done so.

11 With regard to the public comments  
12 wishing to be offered tonight, there are, and  
13 as is any case in DNREC public hearings,  
14 formal protocols which must be adhered to to  
15 this -- to this hearing today.

16 Please be advised of the following  
17 rules which are in place for tonight's formal  
18 proceedings.

19 With regard to the public comment  
20 wishing to be offered tonight there are, and  
21 as in all cases for DNREC public hearings,  
22 formal protocols which must be adhered to.

23 The first one consistent with  
24 public hearings held at DNREC, all comments



1 must be limited solely to the subject matter  
2 of tonight's hearing, which again is the  
3 pending application for distribution and  
4 marketing permit submitted by the  
5 Department -- submitted to the Department by  
6 NaturaLawn of America.

7 Pursuant to the subject matter of  
8 this hearing, all comments produced to the  
9 aforementioned permit application will be  
10 incorporated into the formal hearing record  
11 being generated in this manner.

12 As is DNREC's policy at  
13 formal proceed -- formal hearings such as  
14 this, each person -- person wishing to offer  
15 comment tonight is asked to do so in a  
16 precise manner as possible.

17 In order to treat attendees at all  
18 DNREC hearings equally, each person will be  
19 granted a total of three minutes of time to  
20 offer comment.

21 To facilitate that protocol and to  
22 ensure fairness with regards to the amount of  
23 time each person is allotted to comment,  
24 there will be a visual timer in place tonight





1 to help everyone be aware of their time  
2 remaining while commenting.

3 If you have brought a prepared  
4 written comment or statements with you  
5 tonight, I would ask that you present them at  
6 that time when you have been recognized as a  
7 commentator so that the same can be marked  
8 into the formal record that is being  
9 generated for this manner.

10 You may then use your three-minute  
11 time allotment to offer a brief summary of  
12 your comments verbally for the benefit of  
13 those in attendance.

14 There will be no yielding of time  
15 from one commenter to another, again to  
16 ensure fairness and quality for each person  
17 offering comment at this hearing.

18 Each person will be granted a total  
19 of three minutes, no exceptions.

20 There is only one authentic record  
21 of this formal proceeding tonight, and it is  
22 the official court reporter's verbatim  
23 transcript.

24 Please remember that a verbatim



1 transcript is created to memorialize  
2 tonight's formal hearing by the court  
3 reporter.

4 She can only hear accurately and  
5 transcribe one voice at a time. In order to  
6 ensure accuracy of this transcript and to be  
7 mindful of the above protocols with the need  
8 for order of this formal proceeding, please  
9 do not speak while another person is  
10 speaking, and do not call out from the  
11 audience for any reason.

12 Whether you are listening or  
13 speaking, we ask that everyone here be  
14 respectful and considerate of all comments  
15 offered with regard to the hearing matter,  
16 even though some comment may differ in  
17 opinion from your own.

18 Additionally, I would ask that all  
19 cell phones be muted and turned off for the  
20 duration of these proceedings so as to avoid  
21 any disruption of this hearing.

22 The statutory purpose of tonight's  
23 hearing is to allow citizens to offer comment  
24 on the application submitted by NaturaLawn of



1           America.

2                         A record consisting of the  
3 transcript of the verbal comments given  
4 tonight, all written comments submitted prior  
5 to the hearing, all exhibits, and my report  
6 will be reviewed by the Secretary.

7                         The Secretary will ultimately issue  
8 an order following that review process,  
9 containing his decision on these applications  
10 and the reasons therefore.

11                        Myself and DNREC staff members are  
12 present to facilitate receipt of public  
13 comment and not to participate in the  
14 proceedings.

15                        There will be no Q and A sessions  
16 permitted during the course of tonight's  
17 formal proceeding.

18                        Lastly, it's important to note that  
19 no decision has already been made by the  
20 Department, nor will any decision be made  
21 tonight with regard to the application of  
22 NaturaLawn.

23                        The purpose of tonight's hearing is  
24 to provide a formal platform for the public



1 to come and offer comments specifically  
2 related to the application submitted and such  
3 comment to be incorporated into the formal  
4 hearing record generated in this matter.

5 The hearing record being generated  
6 in this matter will close at the end of  
7 tonight's proceedings.

8 It is important to note that all  
9 comment, whether offered verbally tonight or  
10 submitted prior to tonight's hearing in  
11 writing, will bear the same exact weight and  
12 will be considered equally by the Secretary  
13 prior to making a final decision to this  
14 matter.

15 The ultimate decision with regard  
16 to this matter is made by DNREC Secretary  
17 Garvin.

18 Tonight's formal proceeding acts as  
19 a mechanism to provide a platform for the  
20 public to provide comment for Secretary  
21 Garvin's consideration if so desired.

22 With that all being said, I am  
23 actually going to turn it back over to Brian  
24 Churchill for the Division's presentation.



1 MR. CHURCHILL: Thank you.

2 Ms. Hearing Officer, I have the following  
3 exhibits I would like to officially enter  
4 into the hearing record.

5 Exhibit Number 1: The permit  
6 application and project development report  
7 for a distribution and marketing permit for  
8 utilization of EQ biosolids in Delaware.

9 Exhibit Number 2: The August 18,  
10 2019 legal notices for NaturaLawn's request  
11 for a distribution and marketing permit.

12 Exhibit Number 3: Part five --  
13 strike that -- Part 3 of the Guidance and  
14 Regulation Governing the Land Treatment of  
15 Waste -- the Land Treatment of Waste  
16 Products.

17 Exhibit 4: The August 25, 2019  
18 request for a public hearing by NaturaLawn's  
19 permit application per Ms. Maria Payan.

20 Exhibit Number 5: The October 20,  
21 2019 public hearing legal notice.

22 Exhibit Number 6: The DNREC State  
23 Calendar posting of the 2019 NaturaLawn  
24 hearing notice.



1                   Exhibit Number 7: The October 21,  
2                   2019 notification e-mail to Ms. Maria Payan  
3                   of tonight's November 13, 2019 public  
4                   hearing.

5                   Exhibit Number 8: A copy of the  
6                   Department's Power Point presentations with  
7                   the public meeting and public hearing on  
8                   NaturaLawn's permit application.

9                   And Exhibit Number 9: Comments  
10                  received on NaturaLawn's permit application  
11                  and project development report submitted by  
12                  Ms. Maria Payan, Mr. Christopher Grobbel, and  
13                  the League of Women Voters.

14                  Here are the exhibits. (Handing)

15                  MS. NEWMAN: Thank you. Please let  
16                  the record reflect Exhibits 1 through 9 as  
17                  the Department exhibits.

18                  MR. CHURCHILL: I apologize. This  
19                  Power Point will be somewhat repetitive, but  
20                  I want to make sure that the information in  
21                  this presentation is part of the official  
22                  hearing record.

23                  Again, my name is Brian Churchill,  
24                  and I'm an environmental scientist with the



1 Department of Natural Resources and  
2 Environmental Control in the Surface Water  
3 Discharges Section. And I oversee the  
4 biosolids program.

5 Again, the purpose of tonight's  
6 hearing is for the public to have an  
7 opportunity to comment on NaturaLawn of  
8 America's permit application for a  
9 distribution and marketing permit of EQ  
10 biosolids in Delaware.

11 What are biosolids? Well,  
12 biosolids are not raw sewage. They are one  
13 of the final products from the treatment of  
14 municipal wastewater at a wastewater  
15 treatment plant.

16 After treatment breaks down and  
17 digests the organic compounds and the  
18 remaining solids are heat dried, only then  
19 are the remaining fine particles ultimately  
20 considered Class A biosolids.

21 Biosolids are a nutrient-rich,  
22 slow-release organic fertilizer product that  
23 can be utilized like animal manure, but they  
24 have minimal odor.



1                   The source of biosolids for  
2           NaturaLawn, as they propose in their permit  
3           application, would be from Chicago's  
4           Metropolitan Water Reclamation District.

5                   The wastewater treatment plant  
6           services approximately 2.3 million people.

7                   The treatment process involves  
8           water entering the plant where trash,  
9           plastic, grit, fats, and oils are removed.

10                  Then the wastewater continues under  
11           aerated digestion, where the solids are  
12           broken down and the odors are greatly  
13           reduced.

14                  Pathogen reduction also occurs  
15           here. However, that's not the primary method  
16           of pathogen reduction for NaturaLawn's  
17           biosolids product.

18                  The treated wastewater then goes in  
19           the clarifiers where the solids are settled  
20           out.

21                  The solids from the plant are then  
22           piped to centrifuges and also air dried to  
23           remove the liquid and concentrate the solids.

24                  At this point the biosolids are the





1 consistency of something like a moist soil.

2 From the Chicago Wastewater  
3 Treatment Plant, the biosolids, the dewatered  
4 biosolids are then transported offsite to  
5 Metropolitan Biosolids Management and  
6 processed further, where they are heated to  
7 at least 176 degrees Fahrenheit, which is 80  
8 degrees Celsius.

9 They are dried to at least  
10 90 percent solids, and they are pelletized.  
11 And this process creates what is known as a  
12 Class A Exceptional Quality product through  
13 what is known as a process to further reduce  
14 pathogens.

15 After sampling is complete, to  
16 demonstrate regulatory requirements, the EQ  
17 biosolids can be distributed nationally, of  
18 course in accordance with Federal and State  
19 requirements.

20 Biosolids are transported from MBM  
21 to blender formulators in Wisconsin, Ohio,  
22 and Pennsylvania by truck.

23 And then the blending of the  
24 biosolids occurs in mixers to specific



1 formulations for turf grass needs, and  
2 biosolids are packaged into 50-pound  
3 fertilizer bags.

4 At this point some additional  
5 contents may be added, such as commercial  
6 fertilizer, different micronutrients,  
7 possibly pre-emergent herbicides, things of  
8 that nature, the specific needs of  
9 NaturaLawn's customers.

10 The materials would then be  
11 distributed in Delaware, upon permit  
12 issuance, to NaturaLawn's Wilmington and  
13 Dagsboro warehouses, where NaturaLawn's  
14 employees would then transport the fertilizer  
15 product to residential or commercial  
16 customers' lawns.

17 The product would be applied in an  
18 agronomic rate by a Delaware certified  
19 nutrient handler to improve the health and  
20 growth of the turf grass.

21 NaturaLawn's sources of biosolids  
22 are outside of the State of Delaware, because  
23 there are no sources of exceptional quality  
24 biosolids in the State of Delaware that meets



1 their needs.

2 There are three wastewater  
3 treatment plants in the State of Delaware  
4 that produce exceptional quality biosolids.  
5 However, the product is either compost or  
6 lime stabilized and a dusty product that is  
7 not uniform and does not meet their needs.

8 And that's why the product would be  
9 sourced from Chicago.

10 NaturaLawn only proposes  
11 distributing a relatively small quantity of  
12 biosolids into the State of Delaware.

13 At some point in the future, there  
14 may be biosolids in the State of Delaware  
15 that meets their needs, but, at minimum,  
16 that's several years away.

17 Biosolids are used on turf grass,  
18 primarily for their nutrients, fulfills the  
19 nitrogen and phosphorous needs of the plant,  
20 the crop, the turf grass, but also has other  
21 nutrients such as zinc and copper.

22 The nitrogen in exceptional quality  
23 biosolids is primarily in the form of organic  
24 nitrogen, which is slow release.



1           The organic nitrogen has to be  
2 broken down by soil microbes before it  
3 becomes available to the plant.

4           This is good for a few reasons. It  
5 minimizes leaching, but it also basically  
6 spoonfeeds nitrogen at a slow rate to the  
7 crop.

8           Also, over time, it increases the  
9 organic content of the soil, which increases  
10 the water-holding capacity of the soil and  
11 helps improve the quality of the turf.

12           What is a distribution and  
13 marketing permit?

14           Well, in Delaware, any facility  
15 that wants to -- any company that wants to  
16 distribute an exceptional quality biosolids  
17 product in the State has to have a  
18 distribution and marketing permit.

19           The permits are in place to ensure  
20 that the biosolids meet State and Federal  
21 requirements and are safe for their intended  
22 use.

23           Exceptional quality biosolids are  
24 essentially pathogen free.



1                   Distribution and marketing permits  
2                   are issued for five years.

3                   And pathogen reduction and vector  
4                   attraction reduction requirements and metal  
5                   limits are all based off of EPA's Biosolids  
6                   Risk Assessment, and those limits are  
7                   mirrored in Delaware's regulations and will  
8                   be incorporated in any distribution and  
9                   marketing permit issued in the State of  
10                  Delaware.

11                  Now, once the biosolids has  
12                  undergone a process to further reduce  
13                  pathogens, some additional testing is done.

14                  The process, itself, has been  
15                  proven by the EPA to kill off pathogens.  
16                  However, there is confirmation sampling  
17                  that's done to ensure that it was successful.

18                  So fecal coliform and salmonella  
19                  are sampled monthly.

20                  The solids content is sampled  
21                  daily.

22                  And the temperature of the  
23                  biosolids, as it goes through the process, is  
24                  monitored and logged at least every 15



1 minutes, but essentially it's actually done  
2 continuously.

3 Within the permit there are  
4 pollutant limits which are associated with  
5 the metals, the limits for metals that can be  
6 in the exceptional quality biosolids.

7 Those limits are listed on the  
8 slide. Provided that the metals are below  
9 these limits, the EQ biosolids can be applied  
10 indefinitely. The metals will not accumulate  
11 in the soil. And EPA has determined that  
12 below these limits they pose no adverse  
13 affect to human health, the environment.

14 Therefore, tracking the total metal  
15 loading is not necessary like it would be for  
16 a Class B biosolids product that has the less  
17 stringent metal requirements associated with  
18 it.

19 This is the same list of pollutants  
20 or parameters, rather, that are required to  
21 be sampled for a distribution and marketing  
22 permit that NaturaLawn would receive. This  
23 is from the draft permit.

24 So you have your moisture content,



1 again daily. The nutrients are monthly. So  
2 that's your total nitrogen, organic nitrogen,  
3 ammonia, nitrate, nitrite -- it only does  
4 nitrate. Nitrite is a very small amount.  
5 It's not really significant.

6 Phosphorous, potassium, volatile  
7 solids, and fecal coliform is also required,  
8 PH.

9 Then there is the ten metals,  
10 arsenic through zinc. They are monthly,  
11 as well. PCBs are monthly. I'm sorry. They  
12 are annually.

13 And the priority pollutant scan is  
14 at least once every three years.

15 This concludes my presentation.  
16 Thank you.

17 MS. NEWMAN: Next we will have the  
18 applicant's representatives provide their  
19 presentation.

20 MR. PAULSON: Hi. My name is Chuck  
21 Paulson. I'm an independent consultant with  
22 professional turf industry. My background is  
23 fertilizer research and development.

24 I spent the last five years as an



1 independent consultant. Twenty-eight and a  
2 half years prior to that, I worked in the  
3 fertilizer market as a product development  
4 manager, sales and marketing. But I spent  
5 most of my time in research.

6 In the early days in the 1980s, we  
7 were looking at organic fertilizers, and  
8 that's what got me to where I'm at today,  
9 down here in Delaware talking about  
10 biosolids.

11 I tested pretty much every organic  
12 fertilizer that was available to me, whether  
13 it be plant-based, animal-based, or  
14 manure-based, and I saw some really special  
15 attributes with these biosolid products that  
16 led me to continue to do more and more  
17 research with them.

18 During the period of 2009 to 2014,  
19 I had 650 datasets, over 50 products being  
20 tested at 13 universities.

21 And what we found was we were able  
22 to take conventional fertilizers and make  
23 them a lot more efficient with the use of  
24 other additives, biocompounds, biostimulants,





1 and organic fertilizers like biosolids. In  
2 fact, we were able to reduce fertilizer rates  
3 by 30 to 40 percent.

4 When you do that, you are taking  
5 soluble nutrients that normally work their  
6 way into our waste stream, and you turn them  
7 into beneficial nutrients that are far better  
8 for us than when we collect them in these  
9 wastewater treatment facilities in the first  
10 place.

11 So we have evidence that these  
12 products work. I'm a big fan of biosolids,  
13 but the one unfortunate thing with biosolid  
14 or any other organic fertilizer that we  
15 source to blend with the commercial  
16 fertilizers is that it's very difficult to  
17 find one that has the particle size, density,  
18 and nutrient load rates that we require for  
19 use in commercial fertilizer applications.

20 So that's why we are asking to  
21 bring product from Chicago into Delaware.

22 We are always on the search for new  
23 organic fertilizers that we can use to  
24 replace biosolids, but until -- until we have



1 evidence that we have organic fertilizers  
2 that are better than what we have right now,  
3 this is what we are stuck with.

4 It's a darn good pellet. We like  
5 it. It's doing what we want it to. We are  
6 re-purposing product that would normally go  
7 in the landfill. We are finding beneficial  
8 uses for it. And that's a good thing.

9 Thank you.

10 MS. NEWMAN: Thank you. Is there  
11 anything else you would like to add, Brian?

12 MR. MCNELIS: No, thank you.

13 MS. NEWMAN: Okay. Thanks. I will  
14 now open it up to the public for public  
15 comment by calling those individuals who  
16 signed in and checked that they would like to  
17 speak.

18 Please keep in mind that there is a  
19 timer set for three minutes per person. And  
20 when you have reached the three minutes, we  
21 ask that you complete your statement and  
22 submit a handwritten comment if you have  
23 so -- if you have one.

24 We are going to start with Shelly



1 Cohen.

2 MS. COHEN: Can I say it from here?  
3 I'm just going to read a couple of documents.  
4 They are not real long.

5 MS. NEWMAN: Sure.

6 MS. COHEN: Shelly Cohen, Sussex  
7 County, concerned citizen.

8 So the first thing I want to read  
9 is just a brief letter. It's actually from  
10 the EPA to a farmer who is asking them are  
11 these biosolids that people want me to apply  
12 to my fields, are they safe.

13 So it's from Elizabeth Rezik, I  
14 think from the EPA.

15 "Good morning. Right now the EPA  
16 cannot say the pollutants found in biosolids  
17 will not cause harmful effects to you, your  
18 crops, or your livestock. We will know more  
19 when we assess these chemicals, something we  
20 are actively working on."

21 "You are asking important  
22 questions. Your decision to use or not use  
23 biosolids will have to be based on how  
24 comfortable you are with not knowing what



1           harm these pollutants and biosolids might  
2           cause."

3                         "Pollutants present in biosolids  
4           don't automatically mean they will pose  
5           harm."

6                         And then she wishes she had more  
7           information for him, and she signs it  
8           respectfully.

9                         And then just bear with me while I  
10          access the other document.

11                        The other thing has to do with the  
12          PFASs. And this is PFAS toxin transfer.  
13          Simply put. So I'm not going to read the  
14          whole thing. I'm just going to read the  
15          stuff about the PFASs.

16                        And I can't pronounce the chemical  
17          names. PFAS, perfluoroalkyl and  
18          polyfluoroalkyl are manmade, flame-retardant  
19          forever chemicals that are bioaccumulative  
20          and toxic at low concentration levels.

21                        That's one thing.

22                        The use of PFAS in thousands of  
23          commercial and industrial applications and  
24          products has resulted in detectable



1 concentrations in sewage, sludge, waste,  
2 found in drinking water soil and vegetation  
3 throughout the country.

4 There is a bit more here. Let me  
5 see if there is something else that kind of  
6 pertains to this.

7 I guess the point of reading that  
8 is I don't think, you know, as wonderful a  
9 program as the Chicago Wastewater Treatment  
10 Plants might have, this is something they  
11 can't control.

12 Chicago is a huge city. There is  
13 lots going on there.

14 There is other things, as well.  
15 How could they tell, if they sample it --  
16 you're saying they sample every day, and like  
17 you're talking about how Delaware has  
18 oversight over this stuff. But that's  
19 Chicago. You don't have oversight over  
20 there.

21 And when you test, when you get  
22 your product, right, you're not -- it's a  
23 one-time deal.

24 Maybe you're getting one truckload



1 a year, according to the information that you  
2 have provided.

3 So that's one test, maybe, if you  
4 are doing -- doing it on what you receive.  
5 You don't really know what's in there or what  
6 people are exposed to.

7 So that's all I have to say for  
8 now.

9 MS. NEWMAN: Thank you. Next we  
10 are going to call -- is it Ken and Joanne, or  
11 are you guys providing --

12 MRS. HAYNES: He will speak first,  
13 and then I will say something.

14 MS. NEWMAN: Okay. So we have Ken  
15 Haynes.

16 MR. HAYNES: Yeah. You, DNREC,  
17 made a mess of this state already, in my  
18 opinion.

19 And you want to bring more arsenic,  
20 chromium, cyanide, heavy metals, mercury,  
21 PCPs, PFAs.

22 Hey, why import it cross country?  
23 What the heck? Walnut Grove, Warminster,  
24 Pennsylvania portion, from the naval air



1 stations that were up there; or, hell, why  
2 even import it from Pennsylvania? Import it  
3 from Dover Air Force Base. They got PFAs.

4 Let them mess up everybody's water.  
5 Hell, Millsboro, we can't even drink the  
6 water coming out of our spigots, because we  
7 have wells.

8 And as the gentleman in front of me  
9 stated, nothing is truly safe.

10 So now I'm going to sit down before  
11 I ruin my gag order.

12 MS. NEWMAN: Mr. Haynes, do you  
13 have written comment that you would like to  
14 submit into the record?

15 MR. HAYNES: No.

16 MS. NEWMAN: Okay. Thank you.

17 MR. HAYNES: One, you wouldn't be  
18 able to read it with my handwriting.

19 MS. NEWMAN: Thank you. Joanne  
20 Haynes?

21 MRS. HAYNES: Good evening. Here  
22 we go again. Delaware Department of Natural  
23 Resources and Environmental, we have been  
24 asking for help for a very long time, and we



1 have been shunned.

2 Now, you have been teaching us  
3 quite well. I don't like what I see. I  
4 would not like to see it in anytime soon. I  
5 would maybe look at it in a couple of years.

6 Our water is bad. If you want to  
7 test your water, I recommend testing it three  
8 times a year. And it should be two to five,  
9 not ten in the hydrates.

10 I don't like this. I am sorry for  
11 the two of you taking your time, but I think  
12 it's not a good idea for Delaware.

13 Delaware has a lot of baggage right  
14 now. And I don't think you want Delaware  
15 slapped on that. Thank you.

16 MS. NEWMAN: Thank you. Next we  
17 have Maria Payan.

18 MS. PAYAN: Maria Payan. I'm  
19 submitting comments based on the citizens  
20 groups from Sussex Health and Environmental  
21 Network, as well as from myself as a  
22 resident, and on behalf of SRAP.

23 So I would like to submit the  
24 gravel environmental report, which he has





1 already submitted; the PFAs toxins transfer  
2 sheet, and also my September 17th comments in  
3 which I requested a hearing to Brian, that  
4 document, as well.

5 I will give them all to you.

6 MS. NEWMAN: Okay. Thank you.

7 MS. PAYAN: In addition, I would  
8 like to add that this is industrial waste.  
9 Cyanide was not mentioned on the sampling  
10 requirements, although that is in there.

11 It is toxic to fish, harmful to  
12 children. This can be applied on school  
13 athletic fields, public parks, golf courses.  
14 It is industrial waste. I don't consider  
15 this an organic product.

16 It is cheap waste disposal.

17 The sites where we have had D&M  
18 permits have not been managed well. EPA  
19 actually inspected the one last year at  
20 Blessings.

21 DNREC does not seem to have the  
22 political will or maybe is not competent to  
23 be doing their job.

24 It has also horrible odor. And the



1 Class A packages, they reactivate after field  
2 application. They can for 30 days. So  
3 that's all.

4 MS. NEWMAN: Thank you. Please let  
5 the record reflect the documents handed to me  
6 are going to be marked as Payan Exhibit 1.

7 Is there anyone who -- I have Chuck  
8 Paulson. You signed in that you wanted to  
9 make public comment, but were you looking  
10 to --

11 MR. PAULSON: In addition to the  
12 comment I made, I would like to make one more  
13 comment.

14 MS. NEWMAN: Okay.

15 MR. PAULSON: And that is that  
16 Brian brought up that biosolids are not raw  
17 sewage sludge.

18 The biosolids that we are talking  
19 about here are Class A biosolids.

20 And during that process, what's  
21 really happening here is we are taking solid  
22 waste material out of the waste stream, it's  
23 dewatered. Your damp material is then broken  
24 down with microbes.



1           These are the same microbes that we  
2           extract from nature. Anything that's organic  
3           in nature that dies will break down, and it's  
4           these specific microbes that break them down.

5           So what we are stuck with after  
6           everything is ingested or digested is this  
7           organic nitrogen fertilizer.

8           And interestingly enough, this  
9           organic fertilizer is really nothing less  
10          than dead microbes, 100 percent.

11          It's further heat treated and  
12          things like that, and it goes through all  
13          these tests to make them EPA certified.

14          But what we are dealing with here  
15          is the same thing that happens in nature.

16          Instead of taking a year, year and  
17          a half for this breakdown to happen, this  
18          accelerated takes only 22 to 27 days.

19          But these microbes in the process  
20          are very, very similar to what's been  
21          happening for thousands, tens of thousands of  
22          years in this environment.

23          And I think every wastewater  
24          treatment facility that is producing the



1           Class A biosolids is using that same  
2           approach, you know, when they develop these  
3           fertilizers.

4                       MS. NEWMAN: Thank you.

5                       Is there anyone else who would like  
6           to provide a written comment that -- or not  
7           written comment -- who would like to provide  
8           a verbal comment that signed in and checked  
9           no?

10                      Okay. With no further comments  
11           being offered, I want to thank you all for  
12           attending tonight. And this hearing is  
13           adjourned at 7:26 - or 27 - sorry.

14                      (Concluded at 7:27 p.m.)

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CERTIFICATE

I, Lorena J. Hartnett, a Notary Public and Registered Professional Reporter, do hereby certify that the foregoing is an accurate and complete transcription of the proceeding held at the time and place stated herein, and that the said proceeding was recorded by me and then reduced to typewriting under my direction, and constitutes a true record of the testimony given by said witnesses.

I further certify that I am not a relative, employee, or attorney of any of the parties or a relative or employee of either counsel, and that I am in no way interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office on this 16th day of November 2019.



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Lorena J. Hartnett  
Registered Professional Reporter

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