

Cohen Exh. #1

**Vest, Lisa A. (DNREC)**

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**From:** DoNotReply@delaware.gov  
**Sent:** Wednesday, January 08, 2020 3:44 PM  
**To:** HearingComments, DNREC (MailBox Resources)  
**Subject:** Public Hearing Comments

Comments on Docket #2019-P-W-0030

Name: Shelly Cohen  
Phone: 3024481519  
Email Address:

Organization: I am a citizen who is concerned about Public Health and the Environment. I belong to the LWV and grassroots environmental groups.

Comments:

Research for Allen Hatchery wastewater I am a concerned citizen worried about the impact of agricultural/industrial waste polluting the fresh water supply in Sussex County. Our sole source of water for drinking, cooking and bathing is the aquifer. The method of obtaining water supply is either private well, community well or a municipal well, all of these source water from the aquifer. The Chicken Industry here is Sussex County is the largest in the nation processing/slaughtering 10 Million chickens per week. Each chicken is processed with 6 to 8 gallons of water per week. The chicken grow to slaughter weight in a 6 week period. You need a lot of eggs to become chickens to replace those 10 million chickens each week. The hatchery need to add a margin for future fatalities- chickens dying in those chicken grow houses of disease or injury so the meat is unfit for human consumption. Another margin need to be added for the male chicks that are eliminated as embryos or at hatching because males do not grow as fast, therefore are not as profitable. The hatchery business has a downside. The wastewater from production is a nasty combination of the massive amounts of waste produced in processing combined with a huge assortment of pharmaceuticals and chemicals. The industry likes to advertise NO ANTIBIOTICS EVER, but eggs are inoculated and other pharmaceuticals used to produce "healthy" chicks to supply grow houses and integrators (aka slaughter houses). The chicken industry is prone to all sorts of diseases which can be passed onto humans from handling in employment or consumption from the food chain. Other birds and wildlife can transmit or become diseased from contact with chickens in the various stages of the chicken industry cycle. The e-coli, salmonella, avian flu and other diseases are active and this industry hatching and raising millions of chicks every week uses these pharmaceuticals and strong chemicals to control any outbreaks. The trouble is the waste/wastewater is a primordial swamp of nasties! It's toxic and corrosive - so much so that the Piney Neck wastewater treatment plant has refused to accept the Allen's Hatchery Inc. waste. For DNREC purposes, I'll use the name on the application, Allen Harim Foods LLC. There was a pipeline installed at the 9 Foot Road location to bring the wastewater to a 'manhole" and then to Piney Neck. DNREC issued a permit for this. Apparently, DNREC does not check 1-other DNREC records for other types of permits or violations 2-other State Agencies to determine the legal entities of the applicant 3-current ownership (dead, alive, bankrupt in the process of material change or sale) 4-the application was not adequately reviewed to determine if the documentation was accurate. For instance the legal name of the business, complete information, if the insurance documents were current and accurate Well DNREC decision makers, you may say - it's just a permit to allow travel on Delaware roads, what is the BIG DEAL? I'll tell you why it matters, but first I'll remind you that DNREC is the agency that was established to protect the public, public health and the environment. It means when an application like this is filed, questions should be asked to fulfill the DNREC Mission. The rubber stamp needs to be sent to the round file and the computer, phone and possibly a verifying field visit needs to take place. Question examples: 1-What is in the waste? 2-Why is the lab report incomplete? 3-Why didn't anyone question the "No" answers or why wet ice and method of transport were not adequate for

the bacteria and other contaminants in the water? 4- Where are those unidentifiable spray fields mentioned in the other documents? 5- Are those spray permits expired? Were there violations to the limitations of those permits? 6-Where is the documentation showing the reasons the wastewater cannot be treated per the prior permit? The WWTP destination in the application is limited to treating only the wastewater from the Harbeson Allen Harim Foods LLC. This singular operation is undergoing a material change in wastewater handling by requesting a change to its NPDES permit to allow a lesser level of treatment before sending its own chicken slaughter water through a 12 mile pipeline to the ARTESIAN 90 million gallon Lagoon to be sprayed on 1800 of farmland, trees and the Ingram Creek. There was a hearing on August 21, 2019 about wastewater permits for Allen Harim and Artesian. The extra treatment needed for hatchery waste is not part of either permit application. The decision is still pending. Here's the bottom line. The hatchery waste will enter the food chain and water supply from spraying on farmland used to grow crops for human consumption and animal feed. Spraying the hatchery wastewater also infiltrates the aquifer where the bacteria, viruses, other microbes, chemicals and pharmaceuticals enter the only fresh water supply for thousands of people in Sussex County. How many people need to become ill? How many Cancer Hospitals need to be built to accommodate all the victims of this industry? When will DNREC perform the proper due diligence on permit applications from the Chicken Industry? Please see links for supporting information: <https://www.nature.com/articles/s41598-018-23962-7> <https://www.reuters.com/investigates/special-report/farmaceuticals-the-drugs-fed-to-farm-animals-and-the-risks-posed-to-humans/> <https://www.scientificamerican.com/article/chemistry-could-save-billions-of-baby-male-chickens/> <https://www.airbestpractices.com/industries/food/formaldehyde-monitoring-poultry-industry> Antibiotics acceptable for use in conventional poultry production include the following: \* Bacitracin (e.g., BMD, Pennitracin MD, Albac) \* Chlortetracycline (e.g., Chloratet, Aureomycin) \* Lincomycin (e.g., Lincomx) \* Oxytetracycline (e.g., Terramycin) \* Penicillin. \* Tylosin (e.g., Tylan) \* Virginiamycin (e.g., Stafac, V-Max)  
Shelly Cohen Milton DE

**Vest, Lisa A. (DNREC)**

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**From:** Vest, Lisa A. (DNREC)  
**Sent:** Thursday, January 09, 2020 10:31 AM  
**To:** Shelly Cohen  
**Subject:** RE: PHILLIEGYRL1968@GMAIL.COM has sent you - Allen Harim, DNREC agree to fine, environmental project to offset water pollution - from delawareonline

**Switch-MessageId:** 5fa2151ae62a491c9a7dcd8a8d2be5ec

Ms. Cohen –

Since it is associated with the comments that you did submit while the Record was open for comment, I will allow it. This email will be attached to your prior comments that were previously submitted, and marked at last night's hearing as "Cohen Exh. #1."

As always, thank you for your participation in DNREC's public hearing process.

*Lisa A. Vest  
Regulatory Specialist  
DNREC – Office of the Secretary  
89 Kings Highway, Dover, DE 19901*

Please note - my email address has changed to [lisa.vest@delaware.gov](mailto:lisa.vest@delaware.gov)

*Email: [Lisa.Vest@delaware.gov](mailto:Lisa.Vest@delaware.gov)  
Main line: (302) 739-9000  
Direct line: (302) 739-9042  
Fax line: (302) 739-6242*

*NOTE: The views and/or opinions of the authors expressed herein do not necessarily state or reflect those of the Department of Natural Resources and Environmental Control and/or the State of Delaware*

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**From:** Shelly Cohen <philliegyrl1968@gmail.com>  
**Sent:** Thursday, January 09, 2020 8:28 AM  
**To:** Vest, Lisa A. (DNREC) <Lisa.Vest@delaware.gov>  
**Subject:** Fwd: PHILLIEGYRL1968@GMAIL.COM has sent you - Allen Harim, DNREC agree to fine, environmental project to offset water pollution - from delawareonline

Good morning

Thank you for confirming my emailed comments were entered into the record for the permit hearing for Allen's Hatchery Inc. (Application filed under Allen Harim Foods LLC) Docket #2019-P-W-0030.

I'm forwarding this news article focusing on many of the issues raised about various local Harim business operations including the hatchery operation in Dagsboro. I apologize for not sending this with my comments. If possible, please include it in your hearing record as it directly relates to concerns raised at the hearing.

If you cannot include it in record, please read it because it provides perspective to the greater set of problems. Please understand, I am not against the chicken industry. My concerns are the growing industrial pollution footprint impacting public health and environment in Sussex County.

You'll note that this group of Harim companies claims to have installed state of the art wastewater treatment systems at the Dagsboro hatchery and the Harbeson site, yet there were still violations with the associated unresolved penalties. Also, Harim is subject to other pending DNREC hearing decisions. Thank you for your attention to this matter.

Best regards,  
Shelly Cohen  
Milton DE

Sent from my iPad

Begin forwarded message:

**From:** [do-not-reply@delawareonline.com](mailto:do-not-reply@delawareonline.com)  
**Date:** January 9, 2020 at 7:39:32 AM EST  
**To:** [PHILLIEGYRL1968@GMAIL.COM](mailto:PHILLIEGYRL1968@GMAIL.COM)  
**Subject:** [PHILLIEGYRL1968@GMAIL.COM](mailto:PHILLIEGYRL1968@GMAIL.COM) has sent you - Allen Harim, DNREC agree to fine, environmental project to offset water pollution - from delawareonline  
**Reply-To:** [PHILLIEGYRL1968@GMAIL.COM](mailto:PHILLIEGYRL1968@GMAIL.COM)

Message from: [PHILLIEGYRL1968@GMAIL.COM](mailto:PHILLIEGYRL1968@GMAIL.COM)

Allen Harim, DNREC agree to fine, environmental project to offset water pollution

Allen Harim could face up to \$300,000 in fines for water pollution, but will likely pay \$150,000 and complete an environmental project in Sussex County.

Check out this story on [delawareonline.com](http://delawareonline.com):  
<https://www.delawareonline.com/story/news/local/2018/10/31/delaware-officials-reach-settlement-chicken-company-water-violations/1836231002/>