From: <u>DoNotReply@delaware.gov</u>

To: <u>HearingComments, DNREC (MailBox Resources)</u>

Subject: Public Hearing Comments

Date: Friday, June 05, 2020 11:57:59 PM

Comments on Docket #2020-P-W-0014

Name: Lewis R Podolske Phone: 3029330145

Email Address: lpodolske@aol.com Organization: Millsboro Homeowner

Comments:

I object to the approval of both permits sought by Mountaire. It is important to remember that Mountaire's record as a serious polluter goes back decades. The 2017 "upset" was not a onetime occurrence but one of a continuing series of Mountaire violations over a more than 20 year period as documented by the Center for the Inland Bays in their recent study. Most appalling is that the information regarding Mountaire's long history of violating its permits came from reports the company had regularly submitted to DNREC, which took no meaningful actions to address these violations over the decades. Now DNREC appears to be willing to once again fail to fully address Mountaire's pollution problems and you are allowing them to continue to pollute three years after the "upset" while failing to require adequate corrective actions. Mountaire should be required to build the best available wastewater treatment plant rather than an out of date plant that will result in wastewater with 10 mg/l of nitrogen which is the maximum acceptable level for water safety. Enhanced Nutrient Removal Technology developed in the 1980's would result in wastewater with 3.5 mg/l of nitrogen and would allow for starting to clean up the ground and surface water in the area of the plant. Mountaire should be required to install such a system. The proposed spray irrigation permit does not adequately address the requirements for cold or wet weather alternative spray irrigation operations. The proposed permit also fails to address the needs of local residents for alternative water supplies because Mountaire has polluted the groundwater for their wells making them unsafe as a water source. The proposed permit also fails to require adequate buffer zones around the spray fields. As to the construction permit, there is not adequate information in the application materials for you to make a determination as to whether the system will perform as stated. In addition, the system design is not shown to meet the needs of cold weather operation in the Mid-Atlantic region, nor is there enough effluent storage capacity for cold weather operations. Mountaire should not be permitted to resume full operations until a new state-of-the-art wastewater treatment system is in place to protect the health and safety of Millsboro area residents. Thank you for your consideration, Lew Podolske

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