Comment on Allen-Harim Water Withdrawal Permit Application of February 15, 2019

This application appears to request additional withdrawals of water for its chicken processing plant that could be as much as 10 percent higher per year than allowed under the current permit and as much as a 20 percent increase in what could be withdrawn in one ore more months. DNREC needs to determine if this level of withdrawal would be sustainable over time and taking into account the other calculated water needs for area residents. Without clear measurements of the total water in the aquifers involved and the rate of replacement through rainfall or other sources, it is not possible to determine precisely if the new withdrawal rates will be sustainable under current conditions. In fact we can't be sure if the current withdrawals are completely sustainable. Some indications of sustainability might be obtained by comparing results from pumping tests done over decades and in normal compared to drought years. However, as was pointed out in the comment from the organization Keep Our Wells Clean, the records made available to the public appear totally inadequate to determine if current withdrawal rates are completely sustainable or are leading to diminishing levels of underground water. With projected growth in population in this area of Sussex County, it seems inadvisable to commit to withdrawal rates that could limit the water available for other vital uses. This permit should be rejected until appropriate data on sustainability is obtained.

Since very little water appears to be consumed in this process, permits for disposal of the treated water are necessary for allowing continued or increased withdrawals. The current NPDES permits appear to have expired this year at the end of January. New NPDES permit applications should have been received months ago, but it is not clear that they have been. Additionally, tests done in 2018 by Seewald Laboratories of Williamsport, PA indicate at least one test of Well #7 in which levels of lead were higher than allowable in drinking water. All tests appeared to show significant levels of copper. For most of the wells, further corrosion

of copper and lead from pipes and solder was minimized by treatment with sodium hydroxide and zinc orthophosphate. However the water from one well was not treated, leaving open the possibility that there was further corrosion and possibly higher levels of lead in the used water from that source.

Since nothing in the water treatment process used to treat water prior to disposal would remove lead from the water, it seems that this water should have been tested and the average level of lead reported on the application for an NPDES permit. Without an NPDES permit that accurately reports contamination with lead, water allocations should not be permitted.

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