

Comment on Expansion of the Bioenergy DEVCO Facility

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I oppose permitting the expansion of the Bioenergy DEVCO (BCD) facility on the basis that it is likely to have a negative impact on air quality in nearby environmental justice communities. I also find it questionable that implementation of this process will be of net environmental benefit, particularly as it will affect water quality in the Nanticoke River and nearby portions of the Chesapeake Bay. Additionally, it seems questionable whether there is any net benefit from generation of methane from poultry waste when this generation is dependent on importation by truck of many thousands of tons of poultry waste as well as tons of wood to be used in the digestion process.

Effects on Environmental Justice Communities

There are clearly a number of institutions serving religious and civic needs as well as low-income housing within one-half mile of the BDC site. A significant proportion of the area residents are immigrant who are not fluent in English and who are employed in low wage jobs. These factors, in combination with the high density of heavy industry in this region, means that area residents should be considered part of an Environmental Justice Community. The enlargement of the facility will result in higher levels of NO and, most likely, other air pollutants. The large number of trucks used to bring in the poultry waste and wood for the anaerobic digestion process will create high levels of NOX, SOX and volatile organics, leading to unacceptable ozone levels. Further, the noise of heavy trucks creates an additional level of stress in a community already suffering from other stressors such as poverty and dangerous working conditions. These problems with truck traffic will be exacerbated in the early years of operation because trucks taking water from the site to the Seaford Wastewater Treatment Plant will add to traffic in this area and along the route to the wastewater facility.

Capture of Methane

Loss of methane to the air from anaerobic composting contributes to global warming. Capturing it should be a net improvement. However, the need for heavy use of trucks to import waste into the facility works against that improvement. Without knowing the total truck-miles traveled, we can't calculate their global warming effect. It may well be that this process will cause a net increase in ghg emissions.

Effects on Water Quality

Formation of algae in the Nanticoke River and Chesapeake Bay appear to be increasing in recent decades because of increasing levels of nitrates and phosphates. There are ways of anaerobically processing poultry waste that result in separation of these compounds from the waste stream. It is not clear that the BDC process is one of them. It seems likely that the water disposed of after pre-treatment of wastewater at the plant will contain significant levels of one or both these contaminants.

Because waste will be brought into the facility from a wide area, there is reason for concern that levels of these contaminants will significantly increase in the Nanticoke and nearby regions of the Chesapeake Bay.

Conclusions

This project has been presented as one that will solve the problem of handling vast amounts of waste from the growing and processing of poultry in southern Delaware and Maryland and will improve water quality in our inland bays. It is not really clear, from the information available, that this is true. The wetlands and streams surrounding poultry farms in the two states may well benefit from removal of waste. But what will be the effect of added pollution in the Nanticoke?

This plant does not offer a sustainable solution to the problems created by intensive factory-farming of poultry. Smaller anaerobic digestion operations designed to handle the waste from a single large farm or a group of smaller farms would at least be less unsustainable in that it would involve less pollution and disruption of community life from trucking waste for large distances.

In working toward the creation of Delaware's Coastal Zone, Governor Peterson envisioned a situation in which the areas adjacent to the Delaware River and Bay could be dedicated to the most important role that they could play - - preserving the wetlands and forests as habitat for the myriad species of flora and fauna that make this area a draw for residents and tourists and preserving the River and Bay as an economic powerhouse for the entire region. This area of the Coastal Zone has already undergone degradation from industry and unsustainable agricultural practices. That does not mean that we should turn it into a dumping ground for waste from Delaware or any other state.

Please do not grant this permit.