

**Subject:** Reject permits for Bioenergy DevCo

**Date:** Friday, December 2, 2022 at 3:29:13 PM Eastern Standard Time

**From:** jack.conservaion@gmail.com@mg.gospringboard.io on behalf of John Church

**To:** HearingComments, DNREC (MailBox Resources)

Dear DNREC,

Please deny permits for the Bioenergy DevCo biogas plant proposed for Seaford. This plant would harm human health as well as Delaware's natural environment, and further threatens DE's progress in fighting the problems of climate change.

Despite what the industry claims, anaerobic digestion is not a miracle cure for the pollution that the poultry industry brings to our state. The process uses a huge amount of water in the process of producing climate-altering methane gas, leaving behind contaminated waste. Bioenergy DevCo has failed to prove it can responsibly manage this waste after processing. In fact, Bioenergy DevCo doesn't even have the permits necessary to market many of the products its applications say it intends to produce.

- Most interesting is the independent study conducted by Brunel University London, researchers found that anaerobic digestion produces 27% more emissions than aerobic digestion.

- Many of the anaerobic digesters using manure as a feedstock can NOT produce the energy levels expected. They then need to supplement the feedstock with other organic materials such as crop residues or forest products. All of which should go back into the ground to keep the soil, from where there were taken, healthy.

- A University of Delaware study found that, compared to the CO2 emitted by aerobic digestion, TRUCKING waste to an ANAEROBIC digester INCREASED CO2 equivalents by 67%.

- Lastly, is the state really ready to repeat the experience with Bloom Industry and require the tax payers to bail out Bioenergy DevCo?

What's equally concerning is that this project would create a new profit motive for the poultry industry to create even more waste.

As you know, Delaware ranks worst in the nation both for wells contaminated with nitrates and for waterways too polluted for use. This pollution can harm the health of babies and children and causes massive fish kills and toxic algal blooms. The vast majority of our water pollution is caused by the poultry industry and its mismanagement of waste. The proposed digester will only make these problems worse.

The Bioenergy DevCo plant threatens to pollute our air, poison our water, exacerbate climate change, and bring as many as 73,000 vehicle trips each year into a vulnerable neighborhood. It's clear that Bioenergy DevCo does not take these threats to human and environmental health seriously at all. They have not only failed to show any mitigation plan, but their cursory environmental analysis doesn't even acknowledge these threats.

Placing these dangers within close proximity to Delaware communities, especially vulnerable immigrant communities, is totally unacceptable.

I urge you to say no to this dirty biogas proposal and reject Bioenergy DevCo's permits.

Sincerely,

John Church  
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