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Ms. Lisa A. Vest, Hearing Officer
Office of the Secretary
Department of Natural Resources and Environmental Control
89 Kings Highway
Dover, DE 19901

November 15, 2022

Re: Docket #2022-P-MULTI-0012

Dear Ms. Vest,

This letter is written in support of the proposed anaerobic digester and expansion of the Bioenergy Innovation Center located in Sussex County. The Wicomico Environmental Trust voices its support of this project and asks DNREC to grant the permits sought by Bioenergy DevCo.

If approved, the Bioenergy Innovation Center's anaerobic digestion facility will process up to a quarter million tons of poultry processing and hatchery waste per year, including the dissolved air flotation (DAF) waste currently produced by Perdue's processing plant. Currently, high-nutrient DAF material is stored by waste management companies in several large, open-top tanks across Delmarva in the Chesapeake Bay watershed. This waste is then spread liberally on local farm fields as a soil amendment of uncertain composition and at rates more consistent with waste disposal than fertilization, and creates runoff into streams and rivers, increasing the nutrient loads in our waterways.

DAF and other poultry waste is a huge problem for Delmarva's poultry industry and residents, and anaerobic digestion offers a technologically more advanced way of handling it. Digestors are proven tools focused on the management of waste without the use of landfills or land application, and offer an obtainable goal of protecting natural resources and the environment. The end material produced by anaerobic digestion will create a dry, odor-free, easily transported product that will substantially improve the water quality of our local tributaries and bays.

The Wicomico Environmental Trust champions a healthy environment for all.

The Wicomico Environmental Trust is a public charity recognized as tax exempt by the IRS under Section 501(c)(3). A copy of the current financial statement of Wicomico Environmental Trust, Ltd., is available by writing to WET, P.O. Box 2311, Salisbury, MD 21802. Documents and information submitted under the Maryland Solicitations Act are also available, for the cost of postage and copies, from the Maryland Secretary of State, State House, Annapolis, MD 21401, (410) 974-5534.

While poultry waste issues are substantial, they have been addressed increasingly over the years. The use of anaerobic digestion to reduce this waste is a major technological step to further this progress. The expansion of the Bioenergy Innovation Center will be a tremendous boon to the Delmarva peninsula, and enable the poultry industry to become a better neighbor by better managing its waste. We look forward to seeing this project succeed.

Sincerely,

A handwritten signature in cursive script that reads "Madeleine B. Adams".

Madeleine Adams
President, Wicomico Environmental Trust