

Subject: urging denial of Bioenergy Devco's factory farm gas permits

Date: Thursday, December 1, 2022 at 11:52:43 PM Eastern Standard Time

From: Sara Russell

To: HearingComments, DNREC (MailBox Resources)

To Whom It May Concern-

I am a concerned citizen of Sussex County- concerned with the proposal from Bioenergy Devco, a multinational corporation, to **build** a massive factory farm gas facility in Seaford. To move forward, Bioenergy Devco requires five permits approved from Delaware's Department of Natural Resources and Environmental Control (DNREC)—one Resource Recovery Permit from the Division of Waste and Hazardous Substances; two Natural Minor Permits from the Division of Air Quality; and two Wastewater Facility Construction Permits from the Division of Water. I urge you to deny these permits.

In November 2019- Bioenergy Devco purchased a composting facility located at 28338 Enviro Way, Seaford, Delaware. This facility composts waste from the poultry industry. This site in Seaford had conditional use (CU) permits as a composting facility in an area zoned agricultural (AR-1) to produce compost material (dirt and pellets) from poultry waste. As you know from reviewing the permit requests- Bioenergy Devco is proposing to build a factory farm gas facility- adding storage tanks and other associated site improvements to process poultry waste into methane gas. Bioenergy Devco is building a refinery, which no matter how you describe it- is not admissible in areas zoned agricultural. Moreover, there is a mobile home park a half-mile distance away. This type project needs to be located away from homes; and should be relocated to an industrial zone.

I attended the DNREC BioEnergy Virtual Public Hearing on October 26, 2022.

Representatives from BioEnergy gave an overview of their proposal, and DNREC staff talked about the permit requests. I realized each permit is looked at individually- and only specific to that particular request. This facility needs to be looked at as a whole entity- and how that entity impacts the immediate community and environment. Consider the following-

- The impacts of introducing high truck traffic to the community have not been studied. This project will bring poultry waste from 3 states to Sussex Co- as many as 73,000 vehicle trips per year into a vulnerable community — including many trucks carrying explosive methane gas.
- Reviewing permit proposals, there are NO plans to conduct air and water quality monitoring to measure potential long-term health impacts. Biogas releases harmful compounds and contaminants into the air. The U.S. Department of Agriculture notes that biogas is often highly “toxic to human health and the environment.” In addition to the existing evidence that biogas frequently includes known carcinogens, communities located next to similar facilities have an increased risk of “breathing problems, headaches, chronically reduced lung function, eye irritation, loss of appetite, and corroded teeth.” {Phoebe Gittelsohn et al., "The False Promises of Biogas: Why Biogas Is an Environmental Justice Issue" 5, Env't Justice (May 26, 2021), available <https://www.liebertpub.com/doi/10.1089/env.2021.0025>}
- Biogas facilities are also more likely to be built in economically vulnerable communities, and unfortunately this facility is no exception. Compared to the rest of the state, Seaford has a disproportionately high rate of poverty and minority presence.
- An evacuation plan has not been created to protect residents in the event of a digester emergency, like a methane or hydrogen sulfide leak

- Delaware is the lowest-lying state, which makes us especially vulnerable to the effects of climate change. We are already in a climate emergency- 300,000 tons of poultry waste is polluting Delaware waters. This proposed Bioenergy Devco biogas project would further pollute our air, pollute our water, and exacerbate climate change- adding as much greenhouse gas to the atmosphere each year as a passenger car driving more than 70 million miles.

In closing, please look at each permit proposal in light of how granting each permit would impact the surrounding community and environment- how having a factory farm gas facility would impact air and water quality, our climate... DNREC's role is to protect public health and the environment. Bioenergy Devco has failed their burden under law to show this project will not impact public health; why bring the waste of 3 states to an area already burdened with water pollution? I urge you to deny these permits.

Thank you,
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