

Public Hearing Comments

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Tue 10/25/2022 6:27 AM

To: HearingComments, DNREC (MailBox Resources)

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Comments on Docket #2022-P-MULTI-0012: Bioenergy Innovation Center

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Organization: I'm a DELAWAREAN, a concerned citizen who is also a member of grassroots environmental groups

Comments:

DNREC should deny all permits for this DEVCO Biogas Project for the following reasons. 1- This is a dangerous project. It is a type of FUEL REFINERY masquerading as a "simple RECYCLING project" that was sold to the Sussex County Council as a WIN WIN WIN project of converting the massive Industrial Chicken waste into RNG. Due diligence has not been done. THESE Methane refineries are highly explosive and polluting. The highly probable explosion could be catastrophic for the surrounding community. Biogas production is dangerous. Plants have exploded due or poor maintenance, unskilled labor and membrane failure. There are so many risks for the surrounding community. The pollution (from the plant and approximate 250 weekly diesel powered truck trips poison the community's air, water and land and are very dangerous to human health. There will be constant exposures to trucking and tanker emissions every day because that will be how the refinery receives its supply of OFFAL, chicken litter waste and slaughter bi-products which are needed to create the diggestate for the methane production. Note: these wastes contain other chemicals, polymers, industrial cleaning products and other known "unknowns ". 2- This is an EJ Community (see EPA definition at end). The surrounding residential community consists of modest homes and churches. Per the last US Census the population is 20.5% Black and 22.3 % Hispanic. The impoverished community in 19973 is 17.1% of the population. The Seaford area is home to approximately 8200 people and more than 20% are non- English speaking. While it may be legally considered "renewable energy". This plant will increase air, land and water pollution in 19973. It puts the surrounding community of people, many of whom would be considered EJ, at risk for cancers, other diseases, asthma etc. in the event of an explosion at this methane refinery, many people will be impacted by the catastrophe losing lives and homes. The area surrounding the DEVCO plant consists of the poor and minorities struggling to pay the average rent of \$868 per month while while working at low wage jobs at Perdue, Allen Harim or other low wage labor intensive jobs. There are many small homes, churches and schools near the DEVCO location but none within 600 foot which would require formal notice the industrial operation for production of BIOGAS. THESE RESIDENTS WERE NOT NOTIFIED OF THESE DEVCO OPERATIONS PRIOR TO THE SCC HEARINGS THAT RUBBER STAMPED THE SUSSEX COUNTY APPROVAL TO DEVCO BIOGAS. The locating of dangerous and or polluting business operations into an EJ community of impoverished non English speaking population was approved despite hundreds of people who spoke out against this both in person and in writing. Residents were not notified but were also too afraid and poor to fight for their own health and safety. 3 - This site is approximately 2 miles from Blades DE, an EPA Superfund site due to PFAS water pollution. This DEVCO Biogas refinery is located in the Nanticoke River shed and already has a inherited sizable pond of polluted water from the failed industrial composting operation. The river drains to the severely challenged Chesapeake Bay. (See note below) There will be constant exposures to trucking and tanker emissions every day because that will be how the refinery receives its supply of chicken waste, offal, slaughter bi-products which are needed to create the diggestate for the methane production. 4 - Methane pollutes more more than CO2 and stays in the atmosphere loner. Bloomberg published an article

titled "New Climate Satellite Spotted Giant Methane Leak as It Happened " It documents massive real time leaks of methane emissions from various industrial sources such as pipelines and unlit flares. It happens all over the world and is a major challenge here to combating climate change. The release of 10,000 kilograms per hour of methane is equal to hourly emissions of approximately 250,000 gas powered vehicles. (<https://www.bloomberg.com/news/articles/2021-02-12/new-climate-satellite-spotted-giant-methane-leak-as-it-happened>)

5 - The plant does not have a sewage line to the The Seaford WWTP plant which is not equipped to handle industrial waste. The source of water for refining operations would be on site well water. The plan is to truck, via diesel fuel powered tanker trucks, the DEVCO polluted industrial waste water to the Seaford WWTP which does not process industrial waste.

6- DEVCO BIOGAS claimed it would bring jobs to the area - thousands of jobs. Sussex needs jobs, preferably living wage positions with health benefits . So far, the online information on employment shows very few jobs for Seaford or Delaware. Current website information indicates there are 44 DEVCO employees working in various locations around the United States. <https://www.signalhire.com/companies/bioenergy-devco/employees?page=2>

Considering the on-site activities, it would make sense to have some employees currently working at the site. During the hearings the testifying executives and their attorneys indicated long term on-site employees possibly totaling 30 to 50. Even this optimum number does not seem to be any type of economic boost for Seaford, Sussex County or the entire State of Delaware. What rationale for this extreme business operation justifies these risks? The health and lives of thousands of men, women and children are subject to highly probable RISKS! People who are not likely to have health insurance let alone savings to survive a probable man made catastrophic event. There are many reasons for DNREC as the delegated EPA authority to be concerned about a BIOGAS refinery in any residential community. Yet, here so far, non of the governmental authorities or officials have done anything to protect this residential community, an EJ Community, from a deadly refining operation. Seaford, Sussex County Council, their Planning and Zoning department and DNREC have not properly evaluated this company, all possible risks to the community, the human health risks (especially children and pregnant women) or the potential economic costs to Seaford, Sussex or Delaware for this extremely HIGH RISK industrial business operation. DNREC, please deny permits, put this project on HOLD, initiate baseline air, water and land pollution analysis and tests. While it may be legally considered "renewable". This plant will increase air, land and water pollution in 19973. It puts the surrounding community of people, many of whom would be considered EJ, at risk for cancers, other diseases, asthma etc. in the event of an explosion at this methane refinery, many people will be impacted by the catastrophe losing lives and homes. _____ *The current legal definition of EJ, used by the United States Environmental Protection Agency (US EPA) is, "...the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, ... * The Nanticoke River is a historically "dirty" river but, conditions are improving. This watershed is home to more than 250 endangered plant and animal species as well as containing the most significant wetlands of the Delmarva peninsula. Nitrogen and phosphorous are causing algal blooms. * <https://www.census.gov/quickfacts/fact/table/DE/BZA110220> *Offal definition · Waste parts; esp., the entrails, etc. · Waste parts, especially of a butchered animal. · Offal is defined as waste or garbage. · Refuse; garbage