

March 8, 2022

RE: Artesian Permits for the Sussex Regional Reclamation Facility

Docket #2022-P-W-0004

Public Comments

My name is Anthony Scarpa co-founder of Keep Our Wells Clean, Milton Delaware. I am opposed to the Artesian Sussex Regional Reclamation Facility, Phase 2 Permit Application for the following reasons.

How can DNREC consider the Phase 2 Application when the Phase 1 application for this facility is still being appealed before the Delaware Environmental Appeal Board? This appeal is still open.

Section 7101 of the DNREC Groundwater Discharge Section Regulations Forward, stipulates the basis for "proper siting of wastewater treatment and disposal systems." When the Artesian site was approved by DNREC, no consideration was given to the impact the Artesian facility would have on the adjoining highly contaminated Clean Delaware site. DNREC never asked the applicant, Artesian to look at how the discharge of up to two million gallons a day of industrial wastewater on the Artesian site might impact ground water in the Clean Delaware site next to them.

DNREC already monitors the Clean Delaware site and the long history of drinking water contamination in the adjoining residential neighborhood. When our group, Keep Our Wells Clean submitted a FOIA request to DNREC for well test data from the Clean Delaware site our request was denied. We were told that Clean Delaware was "under investigation" by DNREC so the well test data could not be made public. What is DNREC hiding and why do they go to such great lengths to protect corporations over public health issues?

There is an entire residential neighborhood that has been impacted and will continue to be impacted by both Clean Delaware and the Artesian facility if DNREC doesn't get this right. The groundwater contamination that is in the soil and water under the Clean Delaware site will be pushed into this residential neighborhood by the introduction of the Artesian Spray Irrigation water. Why have no environmental impact studies been required for the combined Clean Delaware and Artesian sites? Public health is more important than corporate profits.

Artesian Spray Field G is less than 50 feet from one of the most contaminated Clean Delaware fields. Our hydrologist has studied the water flow once it enters the ground in Artesian Field G. The water flows from west to east directly into the contaminated Clean Delaware site and then continues east toward the residential neighborhood. Why was this never questioned by DNREC? How can DNREC Permit one facility without looking at adjoining properties? Especially when the adjoining property in question is one that DNREC has been overseeing and regulating for over 20 years and knows the contamination history?

Artesian Field G should not be used for the disposal of industrial or human wastewater. Artesian has over 1700 acres of spray fields under lease. But Artesian choose their largest field next to a contaminated disposal site to begin spraying industrial wastewater, why? It's the closest field to the lagoon so it's cheaper. Who suffers, homeowners in a poor community with little money to fight back.

The racially mixed, community of Collins, Russell and Slim Streets, located off of State Route 16 outside of Milton, have taken the brunt of the Clean Delaware contamination for years. Why add potentially more pollution to their drinking water? Stop the Artesian spraying in Field G now before Phase 2 adds human wastewater.

Phase 2 is about building a sewage treatment plant and adding hundreds of thousands of gallons of human wastewater to the two million gallons of chicken wastewater from Allen Harim daily. Why can't DNREC, Artesian and Clean Delaware take the time to study the impact on residential drinking water surrounding these facilities before approving Phase 2? It's time to put public health first.

The Collins, Russell and Slim Street neighborhood needs clean drinking water now. This community is very similar to Ellendale but smaller is scale. Racially mixed, lower income and burdened by unacceptable water quality.

Before DNREC considers approving Artesian Sussex Regional Reclamation Facility Phase 2, Keep Our Wells Clean is asking that all current and future wastewater spraying on Artesian Field G be immediately suspended. A central water system be installed in the Collins, Russell and Slim Street neighborhood. All future ground application of wastewater and sludge disposal at the Clean Delaware site be suspended and the wastewater be processed by a sewage treatment plant. Enough damage has been caused by land application of raw septage water near residential homes. Let's get this right for everyone's health.

Thank you,

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