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Organization: I'm a concerned citizen living approximately 1.5 miles away from this SRRF WWTP location and also a member of grassroot organizations SHEN, KOWC, Sussex 2030

Comments:

I agree with the verbal comments from the opposition speakers at the Virtual DNREC hearing of 2-23-22. Some of these speakers were able to offer opinion based on the education, skills and many years of working on environmental issues of water, land and air pollution. I will focus on CAPACITY. The SRRF (formerly identified as ANSWRF) would be built for a capacity of 625,000 GPD of processing "RAW" sewage. Without having permits in place, Artesian and its many names, acronyms etc have been making commitments to process sewage to many other subdivisions and municipalities for this site at 12941 Issacs RD in unincorporated Milton. They have promised and been approved by the Sussex County Council to process 150,000 GPD for Georgetown. At that hearing they told the Sussex County Council this would start right away! In other words there was a commitment to process sewage at the non-existent SRRF immediately- an obvious misrepresentation. There have been numerous commitments made to new subdivisions to process sewage for new communities. Recently, Artesian purchased TESI (Tidewater). Tidewater has been processing sewage for the town of Milton for approximately a decade at an existing municipal facility. Milton had contracts with TESI to build a new WWTP at a new better location, protected from Sea Level Rise (SLR). The town held several educational meetings on this followed by voting to build and fund a new replacement WWTP specifically for the Town Of Milton. These plans have been in existence for more than 2 years. ARTESIAN HAS CANCELLED MILTON'S PLANS FOR THIS NEW AUTHORIZED WWTP BECAUSE OF THEIR PURCHASE OF TESI AND DECLARED THAT MILTON DOES NOT NEED THE NEW WWTP BECAUSE ARTESIAN WILL SERVICE THE WW AT THE ARTESIAN SRRF!!!! Old statistics for a population of 2700 Miltonians (now 3300 per new Census) were the Milton TESI WWTP processing 350,000 GPD. Obviously it is more. A back of the envelope calculation would be a current processing at the existing old WWTP is closer to 428,000 GPD. Milton has 4 annexations currently being authorized. One of these alone will double the population within 2 years, thus Milton's WW needs will be more likely to be closer to 900,000 GPD in the near future. THIS DOES NOT INCLUDE THE YEAR OLD COMMITMENT TO GEORGETOWN TO PROCESS THEIR 150,000 GPD of sewage or the need to continue the storage and spraying of the ALLEN HARIM partially treated 2 Million GPD of chicken slaughter water. (2 million GPD x 45 days = 90, 000 Gallon storage capacity. Artesian has made many more commitments to process WW at SRRF for many new subdivisions during hearings at the Sussex County Council, Planning and Zoning and the State of Delaware's PLUS meetings, most recently at latter's the February 23rd virtual meeting.

<https://stateplanning.delaware.gov/plus/agenda/2022/20220223-agenda.pdf?ver=0215> The Sussex hearings are numerous but all of these hearings deserve the due diligence to be researched to estimate the total commitments for sewage processing at the yet to be built Artesian SRRF WWTP. What is this? Can Artesian make promises to process sewage far exceeding the 625,000 GPD capacity of a yet to be permitted or constructed WWTP? Does Delaware allow this to happen? Wouldn't this lead to obvious problems, possibly incredible danger and catastrophe for the surrounding unincorporated residents, communities and the Town of Milton? I need to mention that when Artesian sprays into the trees, the minimal forest near SRRF, that Ingram creek exists in the same spot. It is connected by creeks and ponds

to the Broadkill River and Delaware Bay. Artesian is also in the habit of saying the underground water flows North when it actually flows South and East to the River and Bay. My other concerns are the processing will be at a lesser quality for spraying than DNREC /EPA allows for NPDES contaminating the aquifer, the sole drinking water resource for hundreds of thousands of people. We live in a time of increased risk of diseases like Covid, Lyme and many other diseases. There is a vast increased use of pharmaceuticals for disease, hormonal and other uses. Our area has also encouraged Chicken CAFOs to supply the Chicken Integrators (slaughter houses), both Allen Harim and Perdue are nearby. I close by saying Sussex County needs state of the art WWTPs, not the minimum standard Artesian can get away with for maximum profit to shareholders for this NASDAQ listed behemoth conglomerate. The people of Milton and the surrounding unincorporated Milton area should not be put at risk. We should be protected by State via DNREC. We should not be collateral damage for Artesian profit. This needs to go back to the drawing board with new plans for a state of the art WWTP like the South Coastal Wastewater Treatment Facility near Bethany Beach. It serves multiple communities and when it reached 70% capacity it constructed to double its WW treatment capacity. In other words, they acted to protect the public health and the environment. I agree with the verbal comments from the opposition speakers at the Virtual DNREC of 2-23-22. Some of these speakers were able to offer opinion based on the education, skills and many years of working on environmental issues of water, land and air pollution. I will focus on CAPACITY. The SRRF (formerly identified as ANSWRF) would be built for a capacity of 625,000 GPD of processing "RAW" sewage. Without having permits in place, Artesian and its many names, acronyms etc have been making commitments to process sewage to many other subdivisions and municipalities for this site at 12941 Issacs RD in unincorporated Milton. They have promised and been approved by the Sussex County Council to process 150,000 GPD for Georgetown. At that hearing they told the Sussex County Council this would start right away! In other words there was a commitment to process sewage at the non-existent SRRF immediately- an obvious misrepresentation. There have been numerous commitments made to new subdivisions to process sewage for new communities. Recently, Artesian purchased TESI (Tidewater). Tidewater has been processing sewage for the town of Milton for approximately a decade at an existing municipal facility. Milton had contracts with TESI to build a new WWTP at a new better location, protected from Sea Level Rise (SLR). The town held several educational meetings on this followed by voting to build and fund a new replacement WWTP specifically for the Town of Milton. These plans have been in existence for more than 2 years. ARTESIAN HAS CANCELLED MILTON'S PLANS FOR THIS NEW AUTHORIZED WWTP BECAUSE OF THEIR PURCHASE OF TESI AND DECLARED THAT MILTON DOES NOT NEED THE NEW WWTP BECAUSE ARTESIAN WILL SERVICE THE WW AT THE ARTESIAN SRRF!!!! Old statistics for a population of 2700 Miltonians (now 3300 per new Census) was the Milton TESI WWTP processing 350,000 GPD. Obviously that must be more. A back of the envelope calculation would be a current processing at the existing old WWTP is closer to 428,000 GPD. Milton has 4 annexations currently being authorized. One of these alone will double the population within 2 years, thus Milton's WW needs will be more likely to be closer to 900,000 GPD in the near future. THIS DOES NOT INCLUDE THE YEAR OLD CURRENT COMMITMENT TO GEORGETOWN TO PROCESS THEIR 150,000 GPD of sewage or the need to continue the storage and spraying of the ALLEN HARIM partially treated 2 Million GPD of chicken slaughter water. Artesian has made many more commitments to process WW at SRRF for many new subdivisions during hearings at the Sussex County Council, Planning and Zoning and the State of Delaware's PLUS meetings, most recently at latter's the February 23rd virtual meeting. <https://stateplanning.delaware.gov/plus/agenda/2022/20220223-agenda.pdf?ver=0215> The Sussex hearings are numerous but all of these hearings deserve the due

diligence to be researched to estimate the total commitments for sewage processing at the yet to be built Artesian SRRF WWTP. DNREC please act to protect public health and the environment. Please do further Due Diligence on this application. Thank you Shelly Cohen Milton DE