



November 20, 2023

Via email george.mwangi@delaware.gov

DNREC

Surface Water Discharges Section of the Division of Water

George Mwangi, P.E.

Commercial and Government Services Section

89 Kings Highway

Dover, DE 19901

Re: New Information Relating to
City of Seaford, Delaware Wastewater Treatment Facility
National Pollutant Discharge System (NPDES) Permit No. DE0020265
(State Number WPCC 3161G/74) Application for Renewal

Dear DNREC:

My name is Rachel Casteel, and I am a Regional Representative with the Socially Responsible Agriculture Project. We have submitted written comments on the Seaford Wastewater Treatment Plant NPDES permit in June, and provided verbal comments during the November 8 virtual hearing. We are grateful for the opportunity to provide input, and for your consideration of our concerns with the draft permit. In our written and verbal comments, which focused primarily on the impacts of the BioEnergy Dev. Co facility to Seaford's wastewater treatment facility, we identified PFAS contamination as a concern. See, e.g., SRAP June 22, 2023 Comments p. 4.

I write to urgently draw attention to new data released last week by the EPA regarding PFAS contamination and the City of Seaford. I am sharing the EPA's report¹, along with the data from the EPA displayed on an interactive map, alongside this letter. Every five years, the EPA requires water systems to monitor for several unregulated pollutants, with this current effort focusing on forever chemicals - in an investigative journalism article, the EPA describes it as "its most comprehensive PFAS monitoring initiative ever".² **The EPA report and accompanying**

¹ "Fifth Unregulated Contaminant Monitoring Rule Data Finder" EPA (November 9, 2023) Available at <https://www.epa.gov/dwucmr/fifth-unregulated-contaminant-monitoring-rule-data-finder>

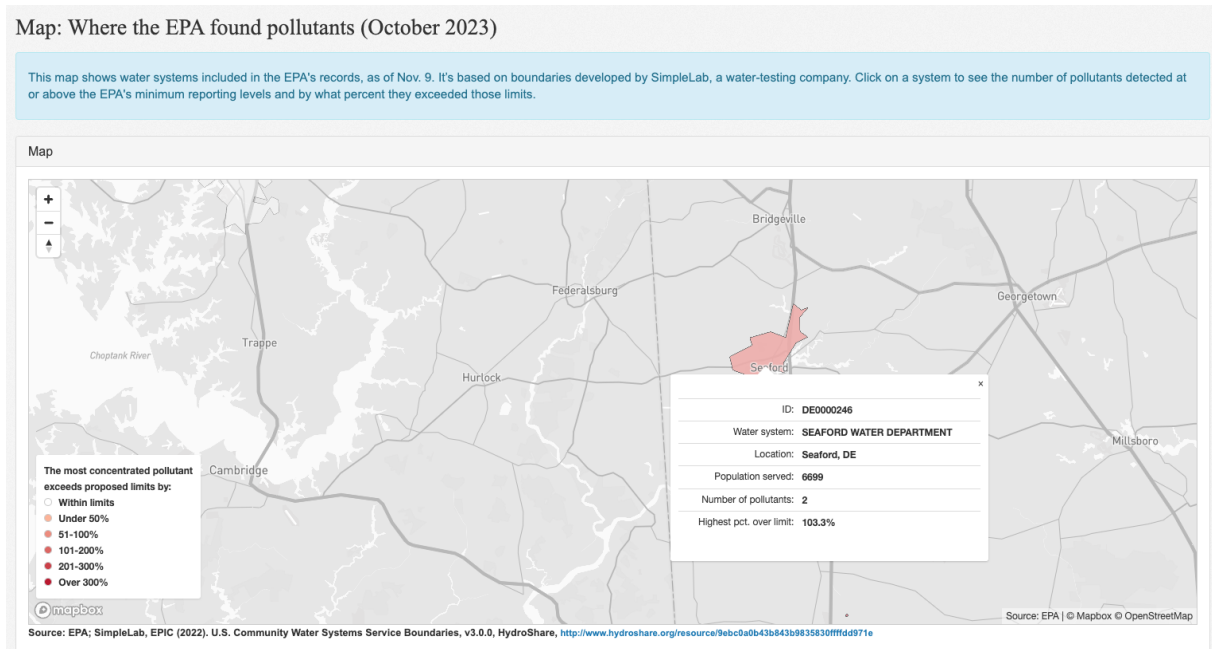
² "EPA detected 'forever chemicals' in water serving 46 million. Is yours on our map?" USA Today (Nov. 11, 2023) Available at

<https://www.usatoday.com/story/news/investigations/2023/11/11/pfas-forever-chemicals-detected-in-water>

data identifies Seaford among areas where PFAS was detected at or above EPA's minimum reporting levels PFAS, See Figure 1, below.

EPA identified two PFAS pollutants detected at or above the EPA's minimum reporting levels, at a 103.3% exceedance of those levels. This information, critical to public health, demands immediate consideration in DNREC's ongoing permit evaluation process.

Figure 1



Screenshot of EPA Map of Community Water Systems Service Boundaries, showing Seaford, Delaware with concentrations of PFAS pollutants exceeding proposed limits by > 101% (available at <https://data.usatoday.com/epa-pfas/>)

The implications of PFAS contamination on public and environmental health are pressing and, as we noted in our June 22, 2023 Comments, EPA has recommended since 2020 that permit writers begin phasing in PFAS monitoring requirements. DNREC's draft permit for Seaford still fails to account for PFAS. Reduction of exposure to PFAS chemicals is a pressing environmental justice concern. The EPA's findings warrant a stronger permit for the Seaford Wastewater Treatment Plant. We urge DNREC to prioritize public health and incorporate EPA's monitoring recommendations and this recent EPA study - which specifically calls out Seaford - into the permit terms and conditions.

Your prompt attention and action in light of this new data will significantly contribute to safeguarding public and environmental health in Seaford, along with all of Delaware.

[-systems-that-serve-46-million/71528470007/?fbclid=IwAR34DBCBLu9n2yhic5hksaGAhUSwDugGmNvyZuFb7AMWHm7e-27HKrJdn4k](https://data.usatoday.com/epa-pfas/)

Thank you for your immediate attention to this pressing issue.

Sincerely,

Rachel Casteel,
Regional Representative
Socially Responsible Agriculture Project
2093 Philadelphia Pike #4133
Claymont, DE 19703
Email: rachelc@sraproject.org