

1 City of Seaford Wastewater Treatment Facility (WWTF)
2 National Pollutant Discharge Elimination System
3 (NPDES) Permit Renewal
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7 Docket No. 2023-P-W-0014
8

9 Moderated by Lisa Vest
10 Wednesday, November 8, 2023
11 6:00 p.m.
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14 Remote Proceeding
15 Water Resources Division
16 89 Kings Highway
17 Dover, DE 19901
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20 Reported by: Heidi Schoentube

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A P P E A R A N C E S

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- List of Attendees:
- Lisa Vest, Hearing Officer
 - Virginia Jackson, Administrative Specialist Office of the Secretary at DNREC
 - Tanessa Perry, Administrative Specialist Office of the Secretary at DNREC
 - George Mwangi, Division of Water
 - John Rebar Jr., Section Manager for the Commercial and Government Section
 - Ryan Shuart, US EPA Region 3-NPDES Permits Section
 - Maria Payan, Public Commentor
 - Rachel Casteel, Regional Rep. with Socially Responsible Agriculture Project
 - Nsanchez, Public
 - Maria, Public
 - Lori Mae Brown DNREC, Public
 - Dez Stuart, Public
 - Brian's iPhone, Public
 - BMears, Public
 - Bhanu Paudel DNREC, Public
 - Sarah M, Public
 - Tina Empey, Public
 - Willie Williams, Public

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A P P E A R A N C E S (Cont'd)

Elisabeth Holmes @ SRAP, Public
1-412-609-7983, Public
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C O N T E N T S

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George Mwangi

Ryan Shuart

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P R O C E E D I N G S

1
2 MS. VEST: So welcome. I want to thank
3 you all for taking time out of your busy schedules to
4 be with us. The date is Wednesday, November 8, 2023,
5 and we are here this evening to provide the virtual
6 platform for the State of Delaware's Department of
7 Natural Resources and Environmental Control to conduct
8 its formal public hearing on the City of Seaford's
9 application for reissuance of its national pollutant
10 discharge system, otherwise known as NPDES for short.
11 That permit allows them to discharge treated
12 wastewater from its wastewater treatment facility
13 located at 403 Nanticoke Avenue in Seaford, Delaware
14 to the Nanticoke River.

15 For those of you who may not recognize
16 me or know me, my name is Lisa Vest, and Cabinet
17 Secretary Garvin has appointed me to serve as the
18 hearing officer for tonight's proceedings.

19 I have a few introductory remarks
20 before we get into everything tonight. But first off,
21 I want to take the opportunity to throw it to one of
22 our administrative specialists. Virginia Jackson has
23 a few brief comments about some of the technology that
24 you'll be seeing utilized tonight during the hearing

1 because we want to make sure that if you choose to use
2 it, you know how to do it.

3 So Virginia, would you please offer
4 that brief primer right now?

5 MS. JACKSON: Thank you, Ms. Vest.
6 Hello, my name is Virginia Jackson. I'm the
7 administrative specialist with the Office of the
8 Secretary here to assist the hearing officer tonight.
9 I'd like to make sure everyone is aware that the Zoom
10 platform we're using has the ability for closed
11 captioning in multiple languages.

12 To start closed captioning, if you're
13 using a computer, at the bottom of your screen, you
14 should see a "Show captions" button. If you do not
15 see the "Show captions" button, you may have to select
16 the three dots that say "More." Once you find your
17 "Show captions" button, you should click the caret
18 pointing up, which will bring up your translation
19 options. You can select your preferred language from
20 there. If your preferred language is not listed, you
21 can select more, and all of the languages will be
22 listed.

23 If you're on a smartphone, at the
24 bottom of your screen, select the "Captions" button

1 indicated by CC. If your preferred language is not
2 listed at the bottom, you may have to select the three
3 dots that says "More." You should then select
4 "Meeting setting," with the gear icon that's next to
5 it. Once the settings page comes up, located at the
6 very bottom, select "Translation language." From
7 there, you'll be able to select your preferred
8 language, then select "Done" at top right corner, and
9 then "Done" again.

10 If the captions are not automatically
11 popping up yet, you may need to select "Captions"
12 again and select "Show captions."

13 Now I'll turn it back over to Hearing
14 Officer Lisa Vest.

15 MS. VEST: Thank you, Virginia. As I
16 said, I have a few introductory remarks before we
17 begin tonight's proceedings. First of all, pursuant
18 to DNREC standard hearing protocols, this hearing is
19 being conducted virtually. While there are no
20 physical sign-in sheets to document attendance
21 tonight, the Zoom platform does keep a list of those
22 who are virtually attending this evening, and the
23 Department can still maintain of a record of who has
24 joined us tonight regardless of whether the attendees

1 are here to offer live comment, as some are, or just
2 tuning in to learn more about the project. And either
3 way, again, I thank you for taking time out of your
4 busy schedule to be here tonight.

5 At the conclusion of these introductory
6 remarks, I will be turning the floor over to
7 representatives for both the Department, specifically
8 the Division of Water, and EPA. Both are going to be
9 offering brief presentations for incorporation into
10 the hearing record tonight.

11 All of the presentations that you'll be
12 seeing tonight are posted on the hearing webpage
13 dedicated to this matter, by the way. So I would
14 encourage you all to go back and review the
15 presentations in detail following tonight's
16 proceedings. I should also note that all of the
17 presentations that are posted on the hearing page are
18 posted not only in English, but in Spanish and Haitian
19 Creole as well. There's a lot of information that's
20 being offered tonight, and again, I would encourage
21 everybody to check out that webpage in detail.

22 We do have a court reporter who's
23 present. She will be preparing a verbatim transcript
24 of the hearing tonight pursuant to the statutory

1 requirement for DNREC to do so. And as always, once
2 we receive that transcript back from the court
3 reporter, it will be posted on the hearing page as
4 well. So everyone can view it, along with the
5 additional presentations and exhibits, and everything
6 that you see tonight, you can review it again at your
7 leisure, especially if you're tuning in tonight to
8 learn more with the thought being that you're going to
9 be providing written comment following the hearing.
10 So definitely please do check that out.

11 I do want to set some parameters for
12 the hearing tonight. First and foremost, this is a
13 formal legal hearing. It is not a public information
14 session nor any other type of informal workshop or
15 town hall event, nor is the purpose of meeting tonight
16 for the Department to advocate in any way. There will
17 be nobody advocating on behalf of DNREC or behalf of
18 the EPA or even the public.

19 Rather, the purpose of tonight's
20 hearing is simply to build the record so that we can,
21 by providing a formal legal platform, learn more about
22 the thing that is presently before the Department and
23 also give platform to those who wish to offer comment
24 should people wish to do so.

1 The community concerns regarding this
2 pending permit as presented tonight are very important
3 to the Department. These concerns are incorporated
4 into the hearing record by the public submitting their
5 comments directly to us, either in writing or live at
6 tonight's hearing. While all comments are
7 appreciated, I must stress that comments must be
8 limited solely to the subject matter of tonight's
9 hearing as previously referenced.

10 Also, all public comments made to DNREC
11 tonight, whether they are received live at the time of
12 the hearing or in writing following the hearing, they
13 all bear the same weight. They'll all be incorporated
14 into the record and will be considered equally by
15 Secretary Garvin prior to his making any decision in
16 this matter. I also want to stress that only comments
17 submitted directly to DNREC and entered by the hearing
18 officer into the formal hearing record as part of the
19 record will be considered. Sometimes on the websites
20 out there, you may see something that looks like you
21 can submit comments there. The Department has not
22 partnered with any additional organizations or
23 websites to assist with acceptance of comments. So
24 please, only submit comments directly to DNREC.

1 For those that have pre-registered with
2 DNREC to offer live comment, when we get to that
3 portion of tonight's hearing, each person will be
4 recognized in the order that their registration was
5 received, and each will be given three minutes to
6 comment.

7 If a commentor is unable to finish
8 their full comments within those three minutes, I
9 would strongly encourage that person to follow up and
10 submit written comments and another thing to keep in
11 mind is while, due to the time restraints, we do limit
12 everybody to three minutes apiece for live commenting,
13 there is no limit on the amount of written comment
14 that you can provide.

15 We are going to be keeping the hearing
16 record open in this matter through November 30th, so
17 that gives you a few weeks following tonight's
18 proceedings to gather your thoughts, again review the
19 hearing page or listen to it again. If you want to
20 look at the presentations and offer comment. And as
21 long as it is received by the Department before
22 November 30th, it's just as if it was done tonight
23 live.

24 I will also say that because we are in

1 a formal legal proceeding, those offering comments
2 tonight must do so in a respectful manner. The
3 Department has zero tolerance for disparaging
4 comments, offensive language, and any type of personal
5 attacks.

6 Now, the following protocols apply to
7 all DNREC public hearings. So I want to just state
8 them briefly for the record. Number one, all comments
9 received must be limited solely to the subject matter
10 of tonight's hearing. All comments pertinent to that
11 subject matter will be incorporated into the record
12 and posted on the hearing webpage in the order that
13 they are received.

14 Number two, in order to ensure that
15 everyone who wishes to offer comment for the
16 Secretary's consideration is accommodated, the record
17 will remain open for receipt of written comment
18 through November 30th.

19 Number three, there is only one
20 authentic record of this proceeding tonight, and it is
21 the official court reporter's verbatim transcript,
22 which again will be posted on the hearing webpage as
23 soon as we receive it.

24 Number four, I mentioned this before,

1 but I'll say it again. The statutory purpose of
2 tonight's hearing is to build the hearing record with
3 regard to the pending permit application submitted to
4 DNREC in this matter. The record consisting of the
5 transcript of tonight's proceedings, all written
6 comments, all exhibits, and eventually the hearing
7 officer's report will be received and reviewed by
8 Secretary Garvin. He will ultimately issue an order
9 following his review, and that order will contain his
10 decisions and the reasons therefore.

11 Lastly, it's important to note that no
12 decision whatsoever has already been made by the
13 Department nor will any decision be made tonight with
14 regard to this pending matter. Again, we're keeping
15 the record open through November 30th so that members
16 of the public are afforded the opportunity to offer
17 written comment during the post-hearing portion of
18 this proceeding should they wish to do so.

19 That being said, I am now going to turn
20 the stage, as it were, over to George Mwangi. He is
21 the Department's responsible staff person with the
22 Division of Water, and he has a brief presentation to
23 offer for the record.

24 So George, you can feel free to share

1 your screen and take it away when you are ready.

2 MR. MWANGI: Thanks, Lisa. Can you
3 hear me okay?

4 MS. VEST: I can hear you fine.

5 MR. MWANGI: And can you see my
6 presentation?

7 MS. VEST: Not yet.

8 MR. MWANGI: Okay.

9 MS. VEST: There we go.

10 MR. MWANGI: Great.

11 MS. VEST: All right. You may proceed
12 when ready, George.

13 MR. MWANGI: All right. Again, my name
14 is George Mwangi, and I'm with the Division of Water.
15 And like Lisa mentioned, I'll be giving a brief
16 presentation on the permit renewal for the NPDES
17 permit.

18 So the City of Seaford currently holds
19 an NPDES permit, and that permit authorizes discharges
20 from their wastewater treatment facility. They're
21 seeking to renew that permit, and they have submitted
22 an application.

23 So the Department prepared a draft
24 permit, and the notice for the application was

1 published on May 24th. We had a 30-day comment
2 period, which closed on June 23rd. And on June 22nd,
3 we received one request for a public hearing. So this
4 hearing offers another opportunity to provide
5 comments. And as the hearing officer mentioned, the
6 comment period is open through November 30th.

7 So again, the facility is located at
8 403 Nanticoke Avenue in Seaford. As you can see on
9 the map on this slide. It has a capacity of two
10 million gallons per day, MGD, and treats wastewater
11 from Seaford, community of Blades, and as of 2021, it
12 also receives wastewater from Bridgeville and
13 Greenwood. And this is following the decommissioning
14 of the Bridgeville wastewater treatment facility.

15 It also receives wastewater from
16 industrial users, and therefore, they do maintain and
17 implement a pretreatment program to regulate
18 discharges from these industrial users.

19 There's one outfall to the Nanticoke
20 River, again shown on the map.

21 With respect to the treatment process,
22 they have screening and grit removal, primary
23 clarification, biological process to remove nitrogen.
24 There's a chemical process to remove phosphorus. We

1 have secondary clarification, sand filtration, and for
2 disinfection, the facility uses chlorination. And
3 this is followed by a dechlorination step to remove
4 residual chlorine before the effluent is discharged
5 into the river.

6 The sludge that's from the treatment
7 process is currently being transported to the Sussex
8 County's Inland Bays Regional Wastewater Treatment
9 Facility. However, Seaford still maintains their
10 distribution and marketing permit, and that serves as
11 a backup option.

12 So the proposed permit includes various
13 requirements, and those requirements are based on,
14 one, the state regulations. That's Title 7 of the
15 Delaware Administrative Code, which includes
16 regulations governing the control of water pollution,
17 the surface water quality standards, the total maximum
18 daily loads, TMDLs, for the Nanticoke River. And
19 there are two TMDLs for which this facility is subject
20 to. There's a TMDL for bacteria and a TMDL for
21 nutrients.

22 The permit requirements are also based
23 on the Chesapeake Bay TMDL for nutrients and sediment,
24 as well as the federal regulations. And that's Title

1 40 of the Code of Federal Regulations, commonly
2 referred to as 40 C.F.R.

3 So for tonight's presentation, we'd
4 like to focus on two key permit requirements. The
5 first is the effluent limitations and monitoring
6 requirements, which I'll be discussing in the next
7 slide. Second, we also have a requirement to maintain
8 a pretreatment program. And in Delaware, this
9 program, EPA is the authority over this program, so we
10 have a representative from EPA Region 3 with us
11 tonight to talk more about that program.

12 So this table shows the discharge
13 limits and monitoring requirements as proposed.
14 First, we have monitoring for flow. So the permit
15 does not include a limit for that; however, the design
16 flow is used to establish the load limitations. Next,
17 there's a limit for enterococcus, which are based on
18 the Nanticoke River TMDL for bacteria, and those are
19 also consistent with the water quality standards.

20 And next, there are limits for BOD5,
21 total nitrogen, and total phosphorus, and these are
22 based on the Nanticoke River TMDL for nutrients. And
23 this TMDL is designed to meet the water quality
24 standards for dissolved oxygen in the Nanticoke.

1 The permit also includes a second set
2 of nutrient limits. That's total nitrogen and total
3 phosphorus, and these are based on the Chesapeake Bay
4 TMDL. These are, however, imposed as a rolling 12-
5 month cumulative load.

6 Next, we have what we call technology-
7 based requirements. And these include limits for
8 total suspended solid, TSS, limits for pH, and
9 influent monitoring for BOD5 and TSS. For the
10 influent monitoring, that's required in order to
11 demonstrate compliance with the requirements to remove
12 at least 92.5 percent of BOD5 and TSS.

13 I should also point out that the
14 Chesapeake Bay TMDL does have requirements for TSS for
15 this facility. However, those requirements are less
16 stringent compared to the technology-based
17 requirements. And for that reason, the permit limits
18 are technology-based.

19 The permit also includes requirements
20 based on the surface water quality standards, and
21 these are for the protection of aquatic life and human
22 health. First, there's a limit for residual chlorine.
23 As I mentioned, the facility uses chlorination for
24 disinfection. There's also monitoring for hardness,

1 and this is required for determining criteria for most
2 metals. We also have monitoring requirements for
3 copper and zinc. So the results of the most recent
4 analysis did not indicate a need for limits, and that
5 analysis included a new criteria for copper that the
6 Department adopted in 2017.

7 Next, we have biomonitoring, which is a
8 test for effluent toxicity to aquatic organisms. So
9 this test looks at the combined effect of multiple
10 pollutants that may be present in the effluent. So
11 it's not specific to any one contaminant. It looks
12 like at the combined effect of any contaminants that
13 might be present in the effluent.

14 Finally, this is what we call a
15 narrative limit, which is simply a requirement that
16 the discharge be free from floating solids, sludge
17 deposits, debris, oil, and scum.

18 So now let's look at how the facility
19 has performed, or rather their compliance history
20 since the current permit was issued. First, we look
21 at flow. So the facility averaged between 0.8 to just
22 below 1.5, and this represents about 40 to 75 percent
23 of its design capacity. And the design capacity is
24 represented by the red dotted line.

1 Next, looking at enterococcus, the
2 facility has had good compliance with the daily
3 average limit. For the daily maximum, there was an
4 exceedance that was reported last year; however, prior
5 to that, as you can see, the facility has been in
6 compliance with the limit.

7 So this slide shows compliance with the
8 nutrient limits. The limits have changed over the
9 term of the permit, so when the current permit was
10 first issued, we had interim limits that were in
11 place. Then there was a permit modification which
12 replaced the interim limits with limits based on the
13 final TMDL goal. So that would explain that first
14 change. The second change occurred when Seaford began
15 receiving flows from Bridgeville, which resulted
16 into -- in Bridgeville TMDL allocation being
17 transferred to Seaford. Again, as you can see, the
18 facility has been in compliance with the applicable
19 limits throughout the term of the permit.

20 For BOD5, the facility has continued to
21 comply with the limits. Looking at TSS, the effluent
22 concentrations have been more variable compared to
23 other pollutants, but again have remained within the
24 limits.

1 Looking at copper, as you can see,
2 prior to 2019, the effluent had significant levels of
3 copper. So Seaford did conduct a study, which
4 identified one of the industrial users as a
5 significant source. That industrial user ceased
6 production and discharge in 2019, and the result, as
7 you can see, was a significant reduction in the levels
8 of copper.

9 Finally, looking at biomonitoring, the
10 test results did not show any toxicity concerns as the
11 facility has not failed any of those tests.

12 Looking at dissolved oxygen, the permit
13 does not have limits but includes monitoring, and this
14 is part of the Chesapeake Bay data requirements. So
15 looking at this chart compares the effluent
16 concentrations to the two most stringent instream
17 criteria, and the standards require that the instream
18 concentrations be at or above the applicable criteria.
19 So as you can see, the effluent concentrations are
20 above the criteria, and therefore do not raise any
21 concerns. It would be a concern if the effluent
22 concentrations were lower. Hopefully, that does
23 address one of the comments that was submitted as part
24 of the hearing request.

1 And finally, here is a list of all the
2 exhibits, which I would like to submit to be entered
3 into the record. And with that concludes my brief
4 presentation.

5 MS. VEST: Okay. Thank you, George.
6 Just a little housekeeping. Before we conclude the
7 Department's portion of tonight's proceedings, the
8 list of exhibits that are up on the screen now, are
9 they the same as those that have been posted on the
10 hearing webpage in this matter?

11 MR. MWANGI: Yes. They are.

12 MS. VEST: And have they been changed
13 or altered in any way since their posting?

14 MR. MWANGI: Not at all.

15 MS. VEST: Very good. Let the record
16 reflect that Department Exhibits 1 through 8 as
17 identified on the current powerpoint and set forth on
18 the hearing webpage dedicated to this matter are
19 hereby incorporated into the hearing record.

20 George, does the Department have
21 anything further it wishes to offer at this time?

22 MR. MWANGI: Not at this time. No.

23 MS. VEST: Thank you very much. That
24 being said, we are now going to turn the floor over to

1 EPA. They have similar type of presentation that
2 they'd like to enter into the record and offer to
3 those in attendance tonight.

4 Ryan, I believe that you're all ready
5 and able to share your screen, so you may begin when
6 ready.

7 MR. SHUART: Great. Can you see my
8 screen?

9 MS. VEST: I can indeed.

10 MR. SHUART: Thanks. Hello, everyone.
11 My name is Ryan Shuart. I'm the current pretreatment
12 coordinator for EPA Region 3, which covers the Mid-
13 Atlantic states. I'll be giving a brief overview of
14 the national pretreatment program and the local
15 pretreatment program run by Seaford, as EPA Region 3
16 administers a pretreatment program in Delaware.

17 This will be a very high-level
18 presentation, so if you're interested in learning more
19 about the pretreatment program, EPA's website has a
20 lot of great information. So I would always look
21 there.

22 Before I get started, I have a quick
23 disclaimer. This presentation has not been subject to
24 formal EPA management review and concurrence. The

1 purpose of this informal presentation is to explain
2 and not to announce, contradict, expand, or limit
3 EPA's policies and positions. In the event of any
4 conflict, existing EPA and U.S. policies and positions
5 govern the matters discussed in this presentation.

6 I have to go over a few common
7 acronyms, as any good EPA presentation does. First
8 one is the Clean Water Act, CWA, which is a federal
9 law that establishes the basic structure for
10 regulating discharges of pollutants into the waters of
11 the U.S.

12 Next is N-P-D-E-S, NPDES, which is the
13 National Pollutant Discharge Elimination Systems,
14 which sets up the requirements for permits which DNREC
15 discussed earlier.

16 Next is POTW or publicly owned
17 treatment works, which put simply are wastewater
18 treatment plants that are publicly owned. So Seaford
19 is considered a POTW. So sometimes, I will use those,
20 Seaford and POTW, interchangeably.

21 IU or industrial user, which are
22 industrial facility that discharge industrial or
23 nondomestic wastewaters to POTWs. These can be, you
24 know, anything from a restaurant, a fast food

1 restaurant, to a commercial building, not just the
2 heavy manufacturing facilities.

3 Next is SIU, or significant industrial
4 user, which are typically your more complex and larger
5 facilities that have that's -- discharge a lot more
6 water, and they must comply with additional
7 requirements in the federal regulations.

8 Next is CFR, or Code of Federal
9 Regulations, which is where the pretreatment and NPDES
10 regulations are listed.

11 So before getting too far into it, I
12 want to speak more broadly about the purpose of the
13 pretreatment program. So the government needed a
14 program to address toxic industrial pollutants.
15 Without the pretreatment regulations, a POTW like
16 Seaford receiving industrial pollutants might violate
17 its own NPDES permit.

18 The pretreatment regulations are
19 intended to prevent the introductions of pollutants
20 that would interfere with the plant operations or
21 cause pass through. So pass through untreated. And
22 you'll see interference in pass through a lot
23 throughout the presentation tonight. Additionally,
24 the pretreatment regulations protect the integrity of

1 the POTW's sewage collection system or sewer system.
2 So the infrastructure like pipes and manholes out in
3 the collection system.

4 Another goal is to promote compliance
5 with sludge regulations and also to improve
6 opportunities to recycle and reclaim wastewaters and
7 sludges.

8 Last but not least, nondomestic users
9 are prohibited from introducing into the treatments
10 work toxic gases or vapors or fumes in a quantity
11 which may cause acute workers' health and safety
12 problems.

13 In order to achieve these goals, EPA
14 created the pretreatment standards, which I'll briefly
15 discuss in a few slides. So now we know the purpose
16 of the pretreatment program, but what actually is it?
17 So it is a Clean Water Act regulatory program. So
18 POTWs are required to obtain an NPDES permit.
19 Wastewater discharge by those POTWs must meet certain
20 standards in order to comply with the Clean Water Act.
21 So in the end, NPDES permits may require to develop a
22 pretreatment program in order for those to occur. The
23 regulations are listed in 40 CFR 403.

24 And essentially, what the pretreatment

1 program is doing is controlling pollutants discharged
2 from industrial sources that are discharging
3 wastewater to publicly owned treatment works. And
4 it's a national program, you know, implemented by --
5 it's a cooperative effort implemented by federal,
6 state, and local regulatory and environmental agencies
7 to work together to implement the goals of the Clean
8 Water Act, to restore and maintain the chemical,
9 physical, and biological integrity of our nation's
10 waters.

11 So here's a quick diagram to look at
12 some of the achieves of the pretreatment program or
13 the purpose of the pretreatment program. You can see
14 at the top here. I'll put my little laser pointer on.
15 It's here to protect the collection system, right,
16 from any corrosion. You know, anything like that,
17 that's very high acidity that could damage the sewer
18 system. Also to prevent explosions or fumes affecting
19 workers' health and safety. Also to limit sludge
20 disposal practices or, you know, compliance with the
21 sludge regulations.

22 And also, like I said earlier, to
23 prevent interference at the treatment works, which is,
24 you know, if there was toxic pollutants discharged in

1 a high enough levels to kill off the bacteria needed
2 to treat the wastewater and also any pollutants that,
3 you know, don't get treated and pass through the
4 treatment works and get discharged to the receiving
5 stream, right? So these are some of the goals of the
6 pretreatment program.

7 So why am I giving this presentation,
8 right? So in Delaware, EPA runs the pretreatment
9 program, and we oversee the NPDES programs throughout
10 the Mid-Atlantic region. DNREC runs the NPDES program
11 and runs -- and writes Seaford's NPDES permit;
12 however, it's not authorized to run the pretreatment
13 program. So EPA directly implements the pretreatment
14 program in Delaware.

15 Since Seaford has a local approved
16 pretreatment program, it controls the industries
17 discharging to it. So EPA approved Seaford's
18 pretreatment program back in 2000, and to accomplish
19 this, Seaford must develop procedures and local
20 regulations to oversee industries discharge going
21 through its system.

22 And now I'll talk a little bit more
23 about what those procedures are in the next few
24 slides. I'll turn this laser pointer off. All right.

1 Like I talked about earlier, I wanted to briefly
2 mention some of the types of pretreatment standards
3 that are developed to address some of the goals of the
4 pretreatment program, right? So there are three main
5 categories. The general and specific prohibitions,
6 the categorical standards, and the local pretreatment
7 standards.

8 The general prohibitions essentially
9 states that an industry can't cause pass through
10 interference with its discharge. So that's pretty
11 straightforward. It's more like a narrative
12 requirement.

13 The second type of pretreatment
14 standards are specific prohibitions, and those are
15 applied to all industrial users. And there's eight of
16 those. They're typically phrases like pollutants
17 won't cause a fire or explosion hazard; it can't
18 discharge solid or viscous pollutants causing
19 obstruction or resulting in interference; oils in
20 amounts that will cause interference; et cetera. So
21 those are more broad statements that are applicable to
22 all industrial users.

23 The second listed is the categorical
24 standards. These are developed by EPA and applied to

1 specific industrial sectors after researching how
2 specific sectors perform, the chemicals used in that
3 process, and what the resulting wastewater looks like.
4 These standards provide the level playing field such
5 that an industry that has identical facilities doing
6 the same processes built in the same year but in two
7 different cities would be expected to meet the same
8 set of standards.

9 And last but not least, the third type
10 of pretreatment standards are local pretreatment
11 standards. All approved POTW pretreatment programs
12 are required to develop local limits, much like
13 Seaford has its own local limits. These limits may be
14 chemical-specific, like a numerical maximum limit for
15 copper or zinc. It could also be a best management
16 practice, such as a prohibition to discharging
17 swimming pool cleaning chemicals or installing a berm
18 around a chemical storage area. And these would be
19 expressed in the POTW's or Seaford's rules and
20 regulations or sewer use ordinance.

21 So getting into some of the
22 pretreatment program components that Seaford is
23 required to have, they must develop adequate legal
24 authority to run a pretreatment program and be able to

1 regulate industrial users. They have to have local
2 limits, like I stated earlier, for pollutants that may
3 cause issues at the wastewater treatment plant or the
4 receiving stream.

5 They need to have procedures in place
6 to find, sample, and inspect industrial users as well
7 as involve the community like public participation
8 procedures. They also have to permit significant
9 industrial users. And they also must be able to
10 enforce the pretreatment standards and have adequate
11 funding to run an effective pretreatment program.

12 So since we at EPA are the pretreatment
13 regulatory authority in Delaware, we oversee Seaford's
14 pretreatment program and have a few checks and
15 balances in place to review their program. As part of
16 that oversight, we review and receive annual reports
17 from them, and we also can conduct audits and
18 inspections of Seaford's pretreatment program. And we
19 review and approve their local limits. And we have
20 the authority to conduct enforcement on Seaford's
21 program if they fail to meet the federal pretreatment
22 program requirements.

23 So that's all I had. There's a lot
24 more information, like I said earlier, available on

1 EPA's website, and if you have any specific questions
2 regarding the pretreatment program, feel free to reach
3 out to me. My contact information is listed here. So
4 that's all.

5 MS. VEST: Okay. Thank you, Ryan, for
6 that very informative PowerPoint. And again, not only
7 is the Department's presentation that was previously
8 given up on the hearing website, so is the EPA
9 presentation that you just witnessed. And is the case
10 with the Department's presentation, EPA has also
11 provided translations of that presentation in Spanish
12 and Haitian Creole as well, and all three versions of
13 that PowerPoint are available for review on the
14 website.

15 So Ryan, thank you very much for your
16 time and for providing that additional information.

17 At this point, we are now going to move
18 forward to the live comment portion of tonight's
19 proceedings. DNREC's present public hearing protocols
20 are that members of the public are welcomed to
21 preregister to offer comment live at the time of the
22 hearing, but you must in fact preregister in order to
23 be recognized this evening. We do have two members of
24 the public who have preregistered, and we'll be

1 getting their comments here shortly.

2 Again, people should remember that the
3 record remains open to receive written comment on this
4 matter through November 30th. So if you didn't have a
5 chance to preregister or you weren't available tonight
6 to offer live comment, it's fine. You can offer
7 written comment. You've got another three-plus weeks
8 to get that into us. And again, whether it is
9 received live tonight or whether we receive the
10 comment in writing, all comments bear the same weight,
11 and they'll all be incorporated into the hearing
12 record and reviewed by Secretary Garvin prior to his
13 making a decision in this matter.

14 Before we turn to that, I do want to
15 offer again the following parameters for public
16 comment. Again, it must be related to the subject
17 matter of tonight's hearing. Each pre-registrant is
18 given three minutes of time to offer their comments
19 for the record. The timer will begin when the
20 commentor starts talking, and the system will
21 automatically re-mute the commentor at the end of the
22 three-minute time period.

23 I would ask those who are offering
24 comment this evening to begin by identify yourself,

1 both for the benefit of the record and for the court
2 reporter who is preparing the transcript of tonight's
3 proceedings. The commentor's video will remain off
4 while offering their comments. There is no sharing or
5 yielding of each person's time. Each commentor gets
6 three minutes.

7 And again, while the Department
8 appreciates all of the comments that may come in from
9 the public, there is a zero tolerance policy for any
10 kind of disparaging remarks, offensive language, or
11 personal attacks.

12 I don't foresee that happening tonight,
13 but should comments fall into such an unfortunate
14 category, the process is to interrupt once with a
15 warning, and if the disrespectful tone and comment
16 continues, the commentor will be immediately re-muted
17 and removed from the meeting. So again, I don't
18 anticipate that, but unfortunately, we feel it
19 necessary to state these things at every hearing.
20 This is a formal legal proceeding, and as such, it
21 must be given respect by everyone in attendance.

22 So that being said, I will turn it over
23 to the administrative staff assisting me tonight, and
24 I believe that Maria Payan is going to be the first

1 speaker this evening.

2 And Maria, as they're queuing you up,
3 again, the timer will begin when you start talking,
4 and you've got three minutes.

5 MS. PAYAN: Thanks, Lisa. And I wanted
6 to just thank the Department for putting the notices
7 and the presentations in Haitian Creole and Spanish.
8 We appreciate that. And I also wanted to thank Ryan
9 and George for doing the presentations. I am going to
10 be submitting some written comments.

11 Unfortunately, I did not have time to
12 get into some of the additional documents that I
13 wanted to dig through. But I know that the comments
14 that were originally submitted to request the hearing,
15 we share a lot of these same concerns. And we want to
16 make sure that additional product that will be coming
17 from Bioenergy Devco that that will be included in
18 here. We know that they're going to be doing some
19 type of pretreatment, but we'd like to make sure that
20 that's safeguarded and some strict monitoring limits.

21 Other than that, as I said, I will be
22 sending additional written comments, but I'm pretty
23 much in line with most of the suggestions that were
24 turned in at the request of the hearing.

1 MS. VEST: Very good. Does that
2 conclude your comment? I just want to make sure.
3 Maria, are you there?

4 MS. PAYAN: Sorry. I got muted.

5 MS. VEST: That's okay. That's okay.
6 I didn't know whether you were done or whether you
7 just accidentally got cut off or something.

8 MS. PAYAN: No, no, no. No. I'm done.
9 We are going to be sending in written comments, but --

10 MS. VEST: Okay.

11 MS. PAYAN: -- we are in agreement with
12 most of the suggestions that were sent in from the
13 Socially Responsible Agriculture Project. Our main
14 concern is to make sure that there is monitoring and
15 that we're looking at the levels of pollutants that
16 are going in, especially from new sources, that that
17 is included in there.

18 MS. VEST: Very good.

19 MS. PAYAN: So thank you so much.

20 MS. VEST: Thank you. Thank you. We
21 now will turn to the second person that has been
22 preregistered to offer comment. I believe staff is
23 finding them in the queue. And Virginia, if you could
24 just let me know when you find them.

1 MS. JACKSON: Yup. Just give me one
2 moment here. Rachel Casteel?

3 MS. CASTEEL: Yes. I'm here.

4 MS. JACKSON: I'm sorry. I'm having
5 technical difficulty on my end. But I'm going to
6 start the timing now. It's working on my end. It's
7 just not showing on my shared screen. So go ahead,
8 Rachel.

9 MS. CASTEEL: Thank you. My name is
10 Rachel Casteel. I'm a regional representative with
11 the Socially Responsible Agriculture Project. We
12 submitted written comments in June, as DNREC knows,
13 and have been working on the Bioenergy Devco Anaerobic
14 Digestive Proposal in the area. I'm here to give
15 specific comments on BDC's relationship with this
16 specific permit.

17 I have three main points. First,
18 Bioenergy Devco within its five permits to DNREC to
19 process poultry waste from three different states
20 describes the facility as delivering around 60,000
21 gallons per day of wastewater to Seaford's treatment
22 plant. EPA oversees the pretreatment program in which
23 Seaford designs and implements. So DNREC does not
24 play an active role in the pretreatment program.

1 DNREC NPDES permit incorporates this program. Thus,
2 DNREC cannot evaluate the NPDES permit or set
3 appropriate NPDES permit terms and conditions, which
4 includes this pretreatment process without proper
5 information about current influence to the facility or
6 accounts for issues in ambiguity as relating to BDC's
7 relationship with the facility.

8 We believe Seaford's current
9 pretreatment program is out of date, and there have
10 been significant changes requiring modification before
11 DNREC can even consider Seaford's application. We
12 believe Seaford's current pretreatment program does
13 not address all industrial dischargers, and it does
14 not address BDC wastewater transfers, which DNREC
15 allowed when it permitted the BDC permits just eight
16 weeks ago. DNREC cannot evaluate or allow the NPDES
17 wastewater permit without this additional information.

18 Second, the absence of PFAS monitoring,
19 despite EPA recommendations, is a significant
20 oversight. PFAS are forever chemicals that do not
21 break down in the environment or our bodies. Also,
22 the recent removal of copper limits raises serious
23 concerns about the potential copper content and the
24 waste from companies just like BDC. The removal of

1 these limits raise serious questions due to the
2 unknown makeup of BDC's waste. Even after Alan Heran
3 [ph] closed, Seaford continued have copper
4 exceedances, which is a serious cause for alarm. With
5 BDC effluent, copper issues may well occur again, and
6 Seaford then risks not being able to achieve
7 compliance.

8 Third, it's Seaford residents who pay
9 for this public utility, when really, this should be
10 on the backs of the industrial giants who can actually
11 afford it. This expense should not be the community's
12 burden. In order to minimize the cost to the city of
13 Seaford and the public of reaching effluent limits,
14 DNREC can and should, one, establish additional limits
15 on effluent received from certain users, and two,
16 require Seaford to charge a surcharge for industrial
17 users.

18 The responsible management of
19 wastewater should not unduly burden Seaford or its
20 residents. This responsibility lies with the
21 industrial entities and the regulatory bodies to
22 ensure that these processes are managed in a way that
23 safeguards the environment, community health, and the
24 financial wellbeing of Seaford.

1 Thank you for your time, for granting
2 this hearing, and for integrating our comments and
3 changing the permit accordingly. Thank you.

4 MS. VEST: Thank you, Rachel. As I
5 said previously, the Department greatly appreciates
6 the comments that come in at our public hearings, and
7 they will be entered into the record as such.

8 I want to wrap up tonight and thank
9 again both the Department and the EPA for taking the
10 time to offer their presentations and for the two
11 commentors who preregistered to offer their comments.
12 Again, the record is not closing at the conclusion of
13 tonight's proceedings, but it is being left open, and
14 any comments that the Department receives in writing
15 between now and November 30th will be incorporated
16 into the record and will bear the same weight as the
17 two comments that came in live at the time of the
18 hearing.

19 You see on the screen now the various
20 ways that comments may be submitted. You can go
21 through the comment form link on the hearing page, via
22 email to dnrehearingcomments@delaware.gov, or via the
23 United States Postal Service to me directly as the
24 hearing officer, care of DNREC, Office of the

1 Secretary, 89 Kings Highway, Dover, Delaware 19901. I
2 should point out that written comments to DNREC may
3 not be submitted using any type of social media
4 platforms such as Twitter, or I guess we call it X
5 now, Facebook, YouTube, or standardized text
6 messaging.

7 Again, I want to thank everybody for
8 their time tonight. Be sure to check out that hearing
9 webpage to refresh the information that we've learned
10 tonight and to learn more. As EPA said you can also
11 check out their website.

12 Thank you again. This meeting is
13 hereby adjourned.

14 (Whereupon, the meeting concluded at
15 6:46 p.m.)

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CERTIFICATE

I, HEIDI SCHOENTUBE, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise involved in the outcome of this action.



HEIDI SCHOENTUBE

Notary Public in and for the
State of Pennsylvania

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CERTIFICATE OF TRANSCRIBER

I, KATHRYN L. REED, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



KATHRYN L. REED

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