

January 19th, 2016

Request for Hearing -Phase II Wastewater Facilities Construction Permit

Application for Allen Harim Foods LLC located at 18572 Harbeson Road, Harbeson, Sussex County, Delaware, to construct Phase II (Two) improvements to address Biological Nutrient Removal (BNR) upgrades of its Wastewater Treatment Facility to comply with a new NPDES permit discharge limits for Total Nitrogen.

Thank you for the opportunity to comment on this Phase 2 Construction permit.

1. UV disinfection plan is to replace the existing chlorination process to reduce enterococcus prior to discharge. The only information we have is raw wastewater concentration of about 5 billion colony forming units (CFU) per day and a projected discharge concentration of less than 30 col/100 ml (basically an effluent limitation concentration). What we do not know is the concentration of the pathogen immediately prior to the UV disinfection process. It would be impossible to know the destruction efficiency without that information.

The discharge parameters do not include an indicator for human fecal contamination from processing the sanitary wastewater from the two shifts of employees.

2. Abandoned lagoons are not addressed in this expansion Phase II design summary. If not now, when?

3. The pollutant concentrations provided in Table #1 appear to be derived from book values rather than from actual laboratory data (except possibly phosphorus). Where are the laboratory analyses for the existing facility raw wastewater? The applicant does not explain why the maximum concentration for some pollutants when compared to the average have differences of 15%, 30%, or 50% nor is it clear what part of the processing plant creates the significantly higher concentrations and why.

4. Sanitary wastewater should be double considering a second shift is being added. The design summary states the sanitary wastewater is combined with the processing wastewater yet the discharge effluent characterization does not include any pollutants specifically indicative of sanitary wastewater, such as human pathogens/virus, hormones, and undigested medicines.

5. Offal and feathers are supposed to be disposed of using a rendering facility. What is the name of the facility relied upon and is there a contract for services with Allen Harim. According to Phase I documentation, there may be difficulty in insuring there is enough capacity at existing rendering facilities versus using landfills for disposal.

6. Peak flow rate is referred to in the design summary but it was not clear what causes the peak flow (eg., from sanitary or processing flow or both) and whether it is a daily occurrence or how many times a day the peak occurs.

7. Age of tanks and piping is not provided for the existing components of the waste treatment system and how the age and condition is appropriate for doubling the waste flow.

8. Design equations used in the design summary are not referenced by standard or textbook.

Socially Responsible Agricultural Project submits these comments on behalf of Protecting our Indian River (POIR) citizens group and requests a public hearing on the Phase II Construction permit to express these and other concerns and to learn how the construction permit will protect human health and the environment.

Thank you.

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