

In The Matter Of:
DNREC
Mountaire Farms of Delaware, Inc.

Hearing
May 21, 2020

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DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENTAL CONTROL
OF THE STATE OF DELAWARE

RE: Mountaire Farms of Delaware, Inc.)
Application for Construction Permit)

..

Virtual Public Hearing
Dial-In Number: 1-408-418-9388
Access Code: 716 374 068

Thursday, May 21, 2020
6:00 p.m.

..

BEFORE: Lisa Vest, Hearing Officer
FOR THE DIVISION: John Rebar, DNREC

-- Transcript of Proceedings --

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1 MS. VEST: Okay. The time is
2 6:00 p.m. on Thursday, May 21, 2020, and I
3 think that everybody is now connected and we
4 are ready to begin.

5 I want to thank everybody for
6 taking time out of your busy schedules to
7 attend this evening.

8 We are here to provide a virtual
9 platform for the State of Delaware's
10 Department of Natural Resources and
11 Environmental Control to conduct a public
12 hearing on the pending permit application for
13 Mountaire Farms.

14 For those of you who do not know
15 me, my name is Lisa Vest, and Secretary
16 Garvin as designated me to serve as the
17 hearing officer for tonight's proceedings.

18 As we all know, there have been
19 some changes recently made to DNREC's
20 standard hearing protocols, necessary and
21 indicated, of course, by Delaware's ongoing
22 state of emergency due to the COVID-19
23 pandemic.

24 First and foremost, this hearing is



1 being conducted virtually. No staff is
2 together in the same room. Everybody is
3 participating independently at their own
4 prospective locations.

5 While there are no sign-in sheets
6 to document physical attendance this evening,
7 this platform does generate a list of those
8 that are virtually present for this
9 proceeding, so the Department still has a
10 list of attendees.

11 And, again, I do thank you for your
12 interest in this matter.

13 At the conclusion of these remarks,
14 I will be turning the hearing over to
15 representatives for both the applicant,
16 Mountaire -- I believe they have a
17 presentation for the record being generated
18 in this matter -- and immediately following
19 the conclusion of Mountaire's presentation,
20 Department staff will also be making their
21 own presentation regarding this application,
22 again for some background and for the benefit
23 of the record that's being generated in this
24 matter.



1 There is still a court reporter
2 present who will prepare a verbatim
3 transcript of the hearing tonight. She is
4 attending virtually, as well. And, as
5 always, that transcript will be posted on the
6 hearing web page dedicated to this matter as
7 soon as we receive it.

8 As is the case for our virtual
9 hearings, please note that the Department
10 will not be accepting any comment in realtime
11 during the hearing this evening.

12 We wish to assure, however, that
13 everyone is enabled to offer comment for
14 inclusion into the record. Therefore, the
15 record will remain open on the hearing matter
16 through June 22, 2020 so that the public has
17 an ample opportunity to offer comment.

18 I would encourage those who have
19 logged in or who have called in this evening
20 to check DNREC's web page for public
21 hearings.

22 There is a tremendous amount of
23 detail that has been posted regarding the
24 hearing, itself, and both of the



1 presentations that are going to be offered by
2 Power Point tonight. There is a lot of
3 information contained there. And they are
4 all on the page, as well.

5 Of course, all mechanisms
6 previously available by which the public can
7 offer comment remain intact. There is an
8 electronic link. There is e-mail. And, of
9 course, there is the United States Postal
10 Service.

11 Please note the following protocols
12 remain in place for this hearing:

13 All comment received must be
14 limited solely to the subject matter of
15 tonight's hearing. All comments pertinent to
16 the application will be incorporated into the
17 record.

18 In order to ensure that everyone
19 who wishes to offer comment for the
20 Secretary's consideration is accommodated,
21 the record in this matter will remain open
22 following the proceedings tonight through
23 June 22, 2020.

24 There is only one authentic record



1 of this proceeding, and it will be the
2 official court reporter's verbatim
3 transcript.

4 The statutory purpose of tonight's
5 hearing is to build the record with regard to
6 this matter.

7 A record which consists of the
8 transcript of the hearing tonight, all
9 written comments that are received, all
10 exhibits, and ultimately the Hearing
11 Officer's Report will be reviewed by the
12 Secretary.

13 Secretary Garvin will ultimately
14 issue an order following his review. That
15 decision will contain his determination about
16 this permit and the reasons for his actions
17 therefor.

18 Again, as is the case with all
19 DNREC hearings, there is no Q and A session
20 permitted during the hearing, nor will any
21 realtime comments be accepted on this virtual
22 platform tonight.

23 Lastly, it is important to note
24 that no decision has already been made by the



1 Department, nor will any decision be made
2 tonight by the Department with regard to this
3 pending permitting matter.

4 Comments can be submitted through a
5 comment form that's on the hearing page, via
6 e-mail to DNRECHearingComments@dnrec.gov or,
7 again, via the U.S. Postal Service at the
8 physical address for DNREC indicated on our
9 website.

10 Please note that written comments
11 to DNREC may not be submitted using any
12 social media platforms such as Twitter,
13 Facebook, YouTube or text messaging.

14 Lastly, it is important to note
15 that all comment received in any way, either
16 through the United States Postal Service or
17 through any of the electronic mechanisms
18 noted just now, as long as it is received
19 while the record is open, on or before
20 June 22nd, they all bear the exact same
21 weight, and they will all be considered
22 equally prior to the Secretary making his
23 decision in this matter.

24 The ultimate decision regarding



1 this matter is made by Secretary Garvin, and
2 this hearing tonight acts as our mechanism to
3 enable the Department to thoroughly vet it to
4 the public and to let the public know the
5 various ways by which comment can be
6 submitted for the Secretary's consideration.

7 That being said, I believe tonight
8 Mountaire is going to go first with its
9 presentation. John Reid, I believe
10 that you are on the line; is that correct?

11 MR. REID: Yes.

12 MS. VEST: Okay. And I believe
13 that we are ready to begin with the
14 proceedings. So the floor is yours.

15 MR. REID: Good evening, ladies and
16 gentlemen. My name is John Reid, President
17 of Reid Engineering Company on behalf of
18 Mountaire Farms.

19 The purpose of this project is to
20 upgrade the nitrogen removal efficiency of
21 the Mountaire wastewater treatment system.

22 The current wastewater treatment
23 system provides approximately 75 to 85
24 percent nitrogen removal efficiency and



1 produces a final effluent total nitrogen
2 concentration of approximately 21 milligrams
3 per liter.

4 The upgraded wastewater treatment
5 system will increase the nitrogen efficiency
6 to over 96 percent and reduce the final
7 effluent total nitrogen concentration to
8 10 milligrams per liter or less.

9 The Mountaire wastewater treatment
10 system is composed of pretreatment components
11 and final treatment components.

12 The pretreatment components remove
13 solids, oils and grease upstream from the
14 final treatment system.

15 The final treatment components
16 remove oxygen demand from BOD and Ammonia
17 nitrogen, total nitrogen, suspended solids,
18 and fecal coliform prior to disposal by spray
19 irrigation.

20 Then the next slide shows the
21 current pretreatment system is shown on the
22 site plan, and the items colored in pink show
23 where they have a small existing equalization
24 tank, one dissolved air flotation cell, and



1 two anaerobic lagoons that provide
2 pretreatment currently.

3 Next slide.

4 The diagram for the current
5 pretreatment program shown here, wastewater
6 presently goes into a small equalization tank
7 of about 120,000 gallons of volume. And they
8 pump into one dissolved air flotation cell
9 rated at 2,400 GPM. And then the flotation
10 cell discharges into two anaerobic lagoons,
11 followed by a third dissolved air flotation
12 cell, for removal of solids, fat oil, and
13 grease.

14 The partially treated wastewater
15 discharged from the DAF Cell is then divided
16 into two existing Anaerobic Lagoon units.
17 The lagoons provides additional removal of
18 solids and grease, also some BOD, and
19 equalizes the wastewater flow over seven
20 days.

21 The wastewater typically comes out
22 of the processing plant five days a week on
23 weekdays during processing days. And then,
24 after it's pretreated in the anaerobic



1 lagoons and pumped out of the lagoons seven
2 days a week, 24 hours a day, into the
3 downstream activated sludge treatment system.

4 The wastewater pretreatment
5 components reduce the wastewater nitrogen to
6 approximately 300 milligrams per liter or
7 less upstream from the final treatment
8 system.

9 Next slide.

10 The upgrade pretreatment system
11 will, as shown in the site plan in pink, be a
12 combination of three new flow equalization
13 tanks and three dissolved air flotation
14 cells.

15 This will be operated to provide
16 two-stage wastewater pretreatment by flow
17 equalization and dissolved air flotation.
18 The pretreatment programs will eliminate the
19 operation of the existing anaerobic lagoons
20 for wastewater pretreatment.

21 As shown in the next slide flow
22 diagram, the upgrade to the pretreatment
23 components include a new one and a half
24 million gallon flow equalization tank.



1 This new flow equalization tank is
2 12 times larger than the existing
3 equalization tank. It will be pumped out of
4 the new tank 24 hours a day at a steady flow
5 right to two dissolved air flotation cells.

6 One is an existing dissolved air
7 flotation cell, and they are going to install
8 a second dissolved air flotation cell, so
9 they will more than double the flotation cell
10 capacity.

11 And then that pretreatment
12 wastewater will then flow into two, seven-day
13 flow equalization tanks. These seven-day FET
14 tanks, as we call them, replace the two
15 anaerobic lagoons to provide seven-day flow
16 equalization upstream of the final treatment
17 system.

18 The wastewater will be pumped out
19 of the two seven-day flow equalization tanks
20 to the next DAF cell for second-stage
21 pretreatments before it goes to the final
22 treatment system.

23 The nitrogen concentration in the
24 pretreated wastewater is expected to be under



1 240 milligrams per liter versus the current
2 system around 300 milligrams per liter.

3 Each of the seven-day flow
4 equalization tanks will have a minimum volume
5 of 3.5 million gallons each for a total of
6 7 million gallons.

7 Next slide. After pretreatment,
8 wastewater will flow into the final
9 treatment. The current final treatment
10 system -- go to the next slide -- includes a
11 three and a half million gallon reactor plant
12 shown.

13 And after treatment, that plant
14 wastewater flow will go into the two pink
15 circles which are final clarifiers with
16 recycle back to the big tank in the activated
17 sludge process. This process removes end
18 nitrogen.

19 Show the next slide, please. The
20 next slide is a flow diagram of the current
21 final treatment system. Basically, it has a
22 small anoxic reactor, a half million gallons
23 in volume, followed by 3 million gallons
24 aerobic nitrification reactor.



1 The purpose of the first reactor is
2 to remove BOD and nitrate nitrogen.

3 The purpose of the second larger
4 tank is to remove the ammonium nitrogen and
5 some additional BOD into the two clarifiers
6 shown there where the settled solids are
7 recycled back.

8 This system shown here is
9 schematically what's called a two-stage
10 biological nitrogen removal system, or BNR
11 system.

12 The current system is a two-stage
13 system. The total reactor volume is a little
14 over three and a half million gallons. This
15 system provides 75 to 85 percent total
16 nitrogen removal, and the current final
17 effluent total nitrogen concentrations
18 averages about 21 milligrams per liter.

19 Next slide: The upgrade final
20 treatment system as shown on the next site
21 plan will include the installation of two new
22 large reactor tanks to operate upstream from
23 the existing reactor tanks. The two tanks
24 are shown here just south of the larger tank.



1 And then the two existing
2 clarifiers will continue to be used in this
3 system, followed by the clarifier effluent,
4 which presently goes to the spray lagoon in
5 the upgrade. The clarifier effluent will go
6 through a filtration system and sand filters
7 to polish off the effluent.

8 Next slide: Next we show the
9 schematic of the upgrade final treatment
10 system, which is a four-stage nitrogen
11 removal system. The four stages are needed
12 to increase the nitrogen efficiency up to
13 over 96 percent, as previously discussed.

14 The total reactor volume of this
15 upgrade system is over 10 million gallons,
16 again compared to the current system volume
17 of approximately 3.5 million gallons. The
18 new system reactor volume is 288 percent of
19 the current reactor volume, so it's a
20 significant increase in reactor treatment
21 volume.

22 The four-stage BNR system effluent
23 will be pumped into new tertiary filters.

24 These filters are designed so they



1 can function as what are called Denite
2 filters for biological denitrification.
3 These filters polish off suspended solids in
4 the effluent but also have the capability of
5 being operated to remove additional nitrogen.

6 Eighteen Denite filter modules are
7 provided. After final filtration, the
8 effluent will go into a new ultraviolet light
9 disinfection system for removal of fecal
10 coliform bacteria.

11 The biological nitrogen removal
12 system BNR system will produce
13 waste-activated sludge, and that sludge is
14 pumped to a sludge disposal system.

15 The current disposal system
16 includes two 400,000-gallon sludge holding
17 tanks shown on the plan here in circles that
18 is upgraded in the system shown on the next
19 slide in which waste sludge goes --

20 Next slide, please. Thank you.
21 The next slide, sludge goes into two sludge
22 holding tanks, each one about 400,000 gallons
23 each, for a total volume about 800,000
24 gallons tanks and then the sludge is hauled



1 off site to a compost facility.

2 The current sludge dewatering
3 system and disposal is carried out by a
4 commercial sludge disposal company retained
5 by Mountaire. The upgrade sludge disposal
6 system will include, shown on the next slide,
7 a conversion of an existing oxidation ditch
8 basin into an additional sludge storage tank,
9 and sludge aerobic digester.

10 It's showing in the long pink basin
11 up there.

12 Go to the next slide, please.
13 Schematically, it's shown here where the
14 oxidation ditch is added to the sludge
15 disposal system. That provides an additional
16 3 million gallons of sludge storage and
17 aeration volume.

18 In the upgrade, three basins will
19 be operated. Here is each one providing
20 aeration of the sludge, and the total volume
21 for the sludge tanks is now
22 3.8 million gallons instead of
23 .8 million gallons. That represents a
24 475 percent volume versus the current volume.



1 The sludge that is stored and
2 aerated will be pumped into three new screw
3 presses which will be permanently installed
4 in a new sludge disposal building, and sludge
5 will be dewatered from about 2 percent solids
6 up to over 20 percent solids in these screw
7 presses prior to being hauled off site for
8 ultimate disposal.

9 After the wastewater is treated,
10 it's discharged currently into a
11 22 million-gallon spray storage pond, and
12 from there it's pumped into spray irrigation
13 fields.

14 The upgrade spray storage system
15 will include the addition of a second storage
16 pond with a minimum volume of
17 22 million gallons. So the storage volume
18 will be at least double versus the current
19 volume. And then the effluent will be
20 disposed in spray irrigation.

21 That completes my presentation.

22 MS. VEST: Okay. Thank you, John,
23 for that presentation. A little bookkeeping.

24 Let the record reflect that that



1 Power Point presentation presented just now
2 by the applicant is hereby entered into the
3 hearing record as Applicant Exhibit 1.

4 And, as I said at the beginning of
5 tonight's event, that will be posted on the
6 hearing web page. So if someone here
7 watching maybe wanted to go back and look at
8 it while thinking about making your comments,
9 or if it was too small, by all means go on
10 the web page and review it. It should be up
11 there by tomorrow.

12 And thank you again, Mr. Reid, for
13 that.

14 DNREC, are you ready with your
15 presentation?

16 MR. REBAR: I am.

17 MS. VEST: Proceed.

18 MR. REBAR: Okay. Good evening,
19 everybody.

20 This presentation is to go over
21 certain aspects of Mountaire's application
22 associated with their wastewater treatment
23 system, including some upgrades that John
24 Reid talked to you all about.



1 A little bit of background first:
2 The current treatment system
3 experienced a failure in 2017.

4 DNREC required Mountaire to take
5 certain immediate short-term and long-term
6 corrective actions to address the violations
7 associated with that failure.

8 And in response to DNREC's
9 enforcement, Mountaire enlisted the services
10 of Reid Engineering Company to evaluate the
11 treatment system and design system upgrades.

12 So the outcome of that evaluation
13 is the need to upgrade the wastewater
14 treatment plant. And, therefore, Mountaire
15 Farms of Delaware has applied for a spray
16 irrigation construction permit to
17 significantly upgrade the existing wastewater
18 treatment system.

19 These upgrades will enhance the
20 treatment capabilities of the system,
21 resulting in a maximum total nitrogen
22 effluent concentration of 10 milligrams per
23 liter or less, which aligns with State and
24 Federal Drinking Water Standards.



1 And Mountaire has also requested to
2 modify and renew their spray irrigation
3 operations permit in order for them to
4 operate this upgraded treatment system upon
5 its construction.

6 I am now going to highlight several
7 aspects of the application. There is an
8 off-spec diversion proposal within the
9 application. The existing anaerobic lagoon
10 number one is proposed to be retrofitted to
11 function as storm water first-flush and
12 off-spec wastewater lagoon.

13 The first-flush is a term that
14 means the initial surface runoff from a
15 precipitation event, which usually contains
16 the highest levels of pollutants, will be
17 captured in the lagoon, and then it will be
18 stored and eventually sent through the
19 treatment system.

20 In addition, the lagoon will be
21 able to receive any off-spec wastewater
22 diverted in such a case where the treated
23 wastewater quality does not meet appropriate
24 limits.



1 Again, this treated off-spec
2 wastewater will be stored in the lagoon and
3 sent through the treatment system for
4 additional treatment. This lagoon will also
5 be aerated.

6 In any spray operation, there are
7 certain times when it's not appropriate to
8 discharge due to either saturated or frozen
9 soil conditions. The new effluent storage
10 lagoon will increase the facility's treated
11 wastewater storage capacity, allowing them to
12 cease discharging during periods when it's
13 unfavorable to be discharging.

14 And then within the application
15 they have demonstrated -- Mountaire has
16 demonstrated that any excess accumulated
17 wastewater stored in that extra lagoon can be
18 irrigated in accordance with plans that are
19 provided in Appendix 3, Attachment I, K or L.

20 And those are available on the
21 hearing website.

22 In addition, Mountaire has
23 submitted additional supplemental nitrogen
24 balance spreadsheets provided in the



1 application to demonstrate the ability of the
2 spray irrigation system to adjust operations
3 as necessary to treat either off-spec
4 effluent, deal with crop-related issues, or
5 deal with temporary flow variations, and they
6 can do all this while still protecting
7 groundwater quality.

8 During the technical review of the
9 application, Mountaire came to the Department
10 with a slightly revised proposal to change
11 out the anaerobic lagoons they are proposing
12 with flow equalization tanks.

13 This was an attempt by Mountaire to
14 address past concerns regarding the lagoons
15 and water quality.

16 So on April 24th of 2020, Mountaire
17 submitted a revised final design summary
18 report providing all the calculations and
19 details of the new flow equalization tanks
20 along with a revised process flow diagram.

21 Based on this report; DNREC has
22 determined that the revised engineering
23 design summary report provides sufficient
24 details to move forward with construction.



1 That submittal also provided an
2 index of drawings that showed what revisions
3 are needed to update the grading, pipe runs,
4 and electrical details and mechanical details
5 for the enhanced upgrade.

6 These revised drawings are going to
7 be submitted under the permits compliance
8 schedule and then posted on DNREC's website.

9 So we are proposing a draft
10 construction permit with a schedule of
11 compliance. The schedule of compliance will
12 require Mountaire to submit the revised
13 drawings within 180 days of permit issuance.

14 It will require Mountaire to
15 prioritize and complete the construction of
16 all the components necessary to produce
17 effluent with a total nitrogen concentration
18 of 10 milligrams per liter or less within a
19 two-year period.

20 And the permit will require the
21 completion of all the remaining upgrades --
22 the equalization tanks, synthetically lined
23 storage lagoon, solids handling equipment,
24 etc. -- within a three-year period.



1 The permit requires all major
2 system upgrade components to be placed into
3 operation as soon as they are constructed.

4 Therefore, the draft permit
5 includes provisions to allow for each
6 component to be brought online after
7 completion of the following requirements:
8 Inspection and testing of all mechanical
9 system components with DNREC staff present;
10 the submission of a design engineer
11 inspection report; and the submission of a
12 contractor's certificate of completion.

13 The construction permit also has a
14 schedule of compliance associated with
15 certain monitoring requirements.

16 The first one is the requirement
17 within 180 days of permit issuance for
18 Mountaire to submit an influent sampling port
19 location proposal to DNREC for review and
20 approval.

21 The sampling port is required to be
22 positioned to ensure that a representative
23 sample of the influent waste stream is
24 obtained.



1 This sampling port is required to
2 be installed within two years of the
3 effective date of the permit, and that will
4 be in line with the construction schedule.
5 And then that influent monitoring point will
6 become the point of compliance moving
7 forward.

8 Similarly, within 180 days of
9 permit issuance, Mountaire is going to be
10 required to submit an effluent sampling port
11 location proposal. Again, we will be
12 reviewing the proposal.

13 The purpose of this port will be to
14 ensure that a representative sample of the
15 treated wastewater is obtained prior to the
16 storage lagoons.

17 And, again, in line with the
18 construction schedule, the sampling port will
19 be installed within two years of the
20 effective date and will be one of the
21 monitoring points for effluent at that point
22 forward.

23 Several other work plans are also
24 required to be submitted within the



1 construction permit.

2 Within 30 days, Mountaire shall
3 submit a written work plan for a network of
4 shallow observation wells. And the purpose
5 for this work plan is for better defining the
6 shallow groundwater flow in the upper portion
7 of the unconfined aquifer in the area
8 upgradient of residents along Jersey Road.

9 The work plan is going to require a
10 map showing the proposed location of the
11 observation wells. And the observation wells
12 are going to be required to be constructed
13 with relatively short screen intervals
14 designed to adequately measure fluctuating
15 water table elevations.

16 Another work plan that's going to
17 be required is for two nested monitoring
18 systems.

19 One of these systems will be placed
20 in the northern spray field north of Route
21 24, also known as the WHBJ spray area; and
22 then the other system in the southern spray
23 area south of Route 24 in the center block
24 system spray area.



1 These nested systems are going to
2 consist of lysimeter, a shallow monitoring
3 well that is constructed to sample the top of
4 the water table, and then a deeper monitoring
5 well is going to be screened from 15 to
6 35 feet below the ground surface.

7 So all of these wells in the nested
8 monitoring system will all be approved by
9 DNREC prior to installation. All observation
10 wells and nested systems are required to be
11 installed within 60 days of work plan
12 approval.

13 All of the wells are going to be
14 installed by a licensed well driller in
15 accordance with a DNREC-issued well
16 construction permit.

17 All facility wells shall be
18 surveyed by a Delaware licensed professional
19 land surveyor.

20 And then within 60 days of
21 completion of all the installation
22 requirements, Mountaire will submit to DNREC
23 a comprehensive report detailing not only
24 construction details of wells and lysimeters,



1 but also the results of the comprehensive
2 survey, initial depth to water measurements,
3 and the groundwater analytical results.

4 So those are some of the highlights
5 of the draft construction permit.

6 Now I'm going to talk a little bit
7 about the draft operations permit.

8 As everybody is aware, the
9 wastewater treatment facility is designed to
10 receive and treat poultry processing
11 wastewater, stormwater, and sanitary
12 wastewater. That wastewater is treated and
13 then discharged via spray irrigation system.

14 The table in the slide represents
15 the spray fields that are authorized to
16 receive spray. One difference between this
17 permit and the current permit is that the
18 Department has removed the authorization of
19 use of wet weather spray fields.

20 The operations permit will have
21 influent requirements. The monthly average
22 influent to the wastewater treatment system
23 shall not exceed 2.6 million gallons per day
24 in any calendar month. That influent



1 requirement has not changed.

2 In addition, the permit is going to
3 require the relocation of several production
4 wells to spray fields with elevated
5 groundwater nitrate concentrations to allow
6 the pumping for process water purposes of
7 that high nitrogen groundwater to ultimately
8 treat that water through the upgraded system.

9 As we have discussed several times
10 now, the total nitrogen concentration
11 following the construction of the upgraded
12 wastewater treatment system will have a
13 maximum limitation of 10 milligrams per liter
14 of total nitrogen.

15 In addition, the operations permit
16 is going to have a hydraulic loading
17 limitation. This is the amount of water that
18 can be sprayed in inches per week onto each
19 field. And this is based on Earth Data Inc.,
20 the soil consultant for Mountaire, their
21 report that was submitted on December 16,
22 2019.

23 Some additional effluent
24 limitations: The quantity of effluent



1 discharged to any portion of the spray
2 irrigation fields shall not exceed
3 0.25 inches per acre per hour.

4 And the wastewater treatment
5 facility is required to discharge to the
6 limited public access criteria, which is
7 daily permissible average concentration of
8 50 milligrams per liter of BOD, fecal
9 coliform 200 colonies per 100 milliliters,
10 and 50 milligrams per liter of total
11 suspended solids.

12 The next series of slides show a
13 series of monitoring requirements in this
14 draft operations permit.

15 Starting with the influent
16 monitoring requirements, effluent monitoring
17 requirements, and the purpose of this is
18 really just to show all the monitoring
19 required, not necessarily to read through all
20 the items.

21 There are the spray irrigation
22 monitoring requirements, groundwater
23 monitoring requirements.

24 It should be noted that currently



1 there are 33 monitoring wells at the facility
2 with additional monitoring wells required by
3 the construction permit.

4 There is also lysimeter monitoring
5 requirements, soil monitoring requirements,
6 spray irrigation monitoring requirements, and
7 surface water monitoring requirements.

8 The draft operations permit
9 includes sludge or biosolids handling
10 requirements. All the solids generated by
11 the treatment system are required to be
12 removed in accordance with acceptable process
13 control techniques and technologies. And
14 this will allow the treatment system to
15 operate correctly.

16 Any solids removed from the
17 treatment process are required to be
18 contained, transported, and disposed of in
19 accordance with all state, local, and federal
20 regulations.

21 And then the records of the solids
22 disposal, including the volume of solids
23 removed and manifests from the previous
24 calendar year, are required to be submitted



1 to the Department in the annual report.

2 The draft operations permit
3 includes two contingency plans, one for total
4 nitrogen and one for fecal coliform bacteria.

5 The total nitrogen concentration
6 limitations of the plan, upon construction of
7 the upgraded treatment system, if total
8 nitrogen concentrations exceed the
9 10 milligrams per liter limit, the permittee
10 is required to collect a second sample within
11 24 hours of becoming aware of that
12 exceedance.

13 If the second sample also indicates
14 an exceedance, the contingency plan will be
15 enacted.

16 So the contingency plan consists of
17 the permittee notifying the Department within
18 24 hours, along with submitting a copy of the
19 analytical results.

20 The permittee is required to
21 increase the frequency of total nitrogen
22 sampling to once daily and then submit weekly
23 results to the section.

24 At the same time, the permittee is



1 going to examine the operational -- operation
2 and maintenance log to see if any improper
3 procedures were followed.

4 They will also perform a physical
5 inspection of the treatment systems to see if
6 abnormalities are detected.

7 And, of course, they will correct
8 any abnormalities as soon as possible and
9 then submit a detailed report to DNREC within
10 30 days of correction.

11 The permittee will follow their
12 emergency contingency plan and submit monthly
13 total nitrogen balances indicating that they
14 can continue spray irrigation at higher
15 concentrations while not exceeding
16 10 milligrams per liter on a monthly basis in
17 the percolate.

18 I had mentioned that in the
19 application they had submitted a series of
20 nitrogen balance spreadsheets that show
21 different calculations at different
22 concentrations and at different volumes of
23 water that can be discharged so that they do
24 not exceed 10 milligrams per liter on a



1 monthly basis in the percolate.

2 When daily analytical results from
3 three consecutive weeks of sampling no longer
4 exceed the limitation, the permittee will go
5 back to normal monitoring frequencies.

6 And then upon completion of the
7 off-spec lagoon, if the total nitrogen
8 exceedance is confirmed, the permittee shall
9 notify the Department, in which case the
10 Department will determine whether or not
11 treated water is required to be diverted.

12 If required to be diverted,
13 Mountaire is immediately required to cease
14 discharging to the spray fields and divert
15 the treated wastewater to the off-spec lagoon
16 for temporary storage and additional
17 treatment.

18 So there is a fecal coliform
19 bacteria limitation contingency plan. If
20 analytical results for a fecal coliform
21 bacteria test indicate an exceedance of the
22 daily average concentration limitations, the
23 following contingency plan shall be enacted:

24 Within 24 hours, the Groundwater



1 Discharges Section will be notified, copies
2 of the analytical results submitted.

3 Mountaire will begin post-storage
4 lagoon chlorination.

5 They will submit weekly analytical
6 samples to DNREC.

7 Again, they are going to examine
8 their operation and maintenance log. They
9 are going to conduct a physical inspection of
10 the treatment system. And then any
11 corrections that they make will be submitted
12 to DNREC in a report within 30 days.

13 Again, when analytical results
14 indicate that the daily average concentration
15 limitations are no longer being exceeded, the
16 permittee can cease submitting weekly
17 results.

18 And similar to the nitrogen
19 contingency plan, once the off-spec lagoon is
20 completed, fecal coliform exceedance is
21 identified, the permittee shall notify the
22 Department to determine if treated wastewater
23 is required to be diverted.

24 If required, the permittee shall



1 immediately cease discharging to spray fields
2 and divert treated wastewater to the off-spec
3 lagoon where it will be stored and then sent
4 to the upgraded system for additional
5 treatment.

6 If Mountaire is required to enact
7 this plan more than three times in a 12-month
8 period, they are required to submit to DNREC
9 a revised design engineer report with
10 proposed corrective actions in order for them
11 to meet their limits.

12 That report needs to bear the seal
13 and signature of a Class C licensed Delaware
14 Professional Engineer.

15 The report is required to be
16 submitted within one year of the third
17 notification.

18 And then Mountaire is required to
19 initiate implementation of the corrective
20 action plan within 90 days following approval
21 by DNREC.

22 So, in conclusion, upgrades to the
23 treatment system will result in an effluent
24 total nitrogen concentration of 10 milligrams



1 per liter or less, which aligns with State
2 and Federal Drinking Water Standards.

3 The facility's permitted capacity
4 remains the same, but the current use of wet
5 weather fields is discontinued.

6 The anaerobic lagoons will be
7 replaced by flow equalization tanks which
8 will help address odor and mosquito concerns.

9 Production wells will be relocated
10 to spray fields with elevated
11 nitrate-nitrogen concentrations in
12 groundwater, resulting in the treatment of
13 groundwater upon operation of the upgraded
14 treatment system.

15 Extensive monitoring is required in
16 the operations permit.

17 The upgrades include additional
18 treated effluent storage and the ability to
19 divert off-spec water if any issues occur.

20 The permit includes enhanced
21 contingency plans for elevated total nitrogen
22 and fecal coliform bacteria concentrations.

23 And, ultimately, the Department
24 feels that the proposed construction and



1 operations permits and their requirements and
2 conditions are protective of public health
3 and the environment as required by our
4 regulations.

5 And that concludes my Power Point
6 presentation. I do have a series of
7 exhibits.

8 MS. VEST: Okay. Thank you for
9 that presentation, John. Along with the
10 Mountaire presentation, as I noted before,
11 the Department's Power Point presentation
12 that John Rebar just got done going through
13 is going to be included as part of the
14 Department's exhibits to be entered for the
15 record in this matter.

16 And I believe it is included in
17 those exhibits that are now up on display.
18 Correct?

19 MR. REBAR: Yes.

20 MS. VEST: Are the rest of the
21 exhibits as listed here identical to the ones
22 that are already posted on the Department's
23 web page for this hearing?

24 MR. REBAR: They are.



1 MS. VEST: Okay. Thank you. Let
2 the record reflect that the Department
3 Exhibits 1 through 10, as identified in the
4 Power Point exhibit, are hereby entered into
5 the formal hearing record regarding this
6 matter.

7 Does the Department have anything
8 further it wishes to offer at this time?

9 MR. REBAR: It does not.

10 MS. VEST: Thank you, John.

11 At this point of the virtual
12 hearing, we have now heard from both the
13 Applicant and the Department with regard to
14 the matters associated with this pending
15 permit.

16 As noted previously, in order to
17 make sure that everybody has ample
18 opportunity to offer comment, we are going to
19 keep the record open through close of
20 business on June 22, 2020.

21 The comments must be made in
22 writing, and they can be done either through
23 the electronic means that we noted at the
24 beginning of tonight's hearing or the United



1 States Postal Service.

2 We will not be accepting any
3 comments on social media, as noted
4 previously.

5 And all comment, regardless of
6 whether it comes in physically or
7 electronically, as long as it is received
8 while the record remains open through
9 June 22, 2020, will all bear the same weight,
10 and it will all be taken into consideration
11 prior to the Secretary making his final
12 determination.

13 That being said, I'm going to thank
14 everybody for their patience in listening to
15 the presentations.

16 There are a lot of documents and a
17 great deal of material and information on the
18 hearing web page. And, again, I would
19 thoroughly encourage everybody to go check it
20 out, read through it, take your time, and
21 submit a comment if you choose to do so.

22 That being said, thanks again for
23 joining. This hearing is concluded.

24 (Concluded at 6:47 p.m.)



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CERTIFICATE

I, Lorena J. Hartnett, a Notary Public and Registered Professional Reporter, do hereby certify that the foregoing is an accurate and complete transcription of the proceeding held at the time and place stated herein, and that the said proceeding was recorded by me and then reduced to typewriting under my direction, and constitutes a true record of the testimony given by said witnesses.

I further certify that I am not a relative, employee, or attorney of any of the parties or a relative or employee of either counsel, and that I am in no way interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office on this 29th day of May 2020.



Lorena J. Hartnett
Registered Professional Reporter

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