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June 19, 2019

Shawn M. Garvin, Secretary  
Delaware Dept. of Natural Resources  
and Environmental Control  
89 Kings Highway  
Dover, DE 19901

Re: Response to Public Comments made in Connection with Public Hearing on  
May 29, 2019 related to DRPI Landfill Proposed Vertical Expansion Permit  
Application

Dear Secretary Garvin:

In connection with the public hearing held on May 29, 2019 associated with the proposed vertical expansion permit application submitted by Delaware Recyclable Products, Inc. ("DRPI"), this letter addresses comments made at the hearing and in exhibits submitted to the Department by Artesian Water Company ("Artesian"). It supplements the June 12, 2019 DRPI response letter related to Councilman Jae Street's oral and written comments.

Attachment 1 is a June 18, 2019 letter from Geosyntec Consultants which demonstrates that the maximum calculated settlement of waste arising from the vertical expansion is 2.51 feet and the average settlement is less than 2 feet (as opposed to the 6 feet alleged by Artesian). Further, it demonstrates that the vertical expansion will not contribute to an increase in the total volume of leachate. Lastly, it describes the leachate collection system in the lined cells, the leachate toe drain systems in the unlined areas, the shallow groundwater collection system, the groundwater monitoring system and the thick clay barrier between the bottom of the landfill and the upper aquifer, all of which collectively prevent migration from the DRPI Landfill to Artesian's public water supply wells located south of the landfill.

Attachment 2 is a June 18, 2019 letter from Taylor GeoServices which demonstrates that the DRPI Landfill is in a separate water shed from the recharge areas for the Artesian wells (separated by a groundwater divide with DRPI Landfill to the north and the Artesian wells to the south). The natural flow of the groundwater in the DRPI area is to the north (away from the Artesian wells). Additionally, the groundwater collection system at the landfill has the effect of causing an inward groundwater gradient toward the center of the landfill. Further, the letter identifies the thick continuous clays that exist between the shallow and deep zones, creating a barrier to water movement from the shallow to the deep zone. Lastly, the letter describes the groundwater monitoring system at the landfill in the shallow and deep zones and concludes that DRPI Landfill is hydraulically isolated from Artesian's well fields located to the south.

Thank you for the opportunity to provide the attached information. If you have any questions or concerns, please contact me at 267-969-0891 or mbrenna5@wm.com. DRPI respectfully requests that a copy of this letter be included with the record of comments and other information associated with the public hearing on DRPI's Permit Modification Application held on May 29, 2019.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Michael J. Brennan', with a long horizontal line extending to the right.

Michael J. Brennan  
Senior Environmental Counsel  
Waste Management, Inc.

Attachments: Geosyntec Consultants letter dated June 18, 2019  
Taylor GeoServices letter dated June 18, 2019

Cc: Chair, Natural Resources Committee, Delaware House of Representatives  
Ms. Lisa Vest, DNREC Hearing Officer