

As a small state with more than 90% of our rivers, streams, bays and ponds polluted, and being ranked by the CDC as having one of the highest cancer incidence rates in the country, Delaware must seek solutions that improve rather than continue to exacerbate these conditions.

I understand there are no state regulations limiting landfill height (although there should be), but I rely on DNREC to protect and improve air and water quality, and the resulting effects on the health of Delaware's citizens. DNREC has the authority to limit landfill size via its permitting process, and allowing the land filling of an additional 8.4 million cubic yards of waste over an additional 21 years is antithetical to DNREC's stated mission. Especially, since historically, nearly half of DRPI's waste has been from out of state sources.

Landfills are a temporary solution with long term risks to water, air and soil quality. In addition neighboring communities are continuously exposed to emissions from truck traffic, dust and airborne contaminants. Continuing to add 279,000 tons of waste per year into the landfill is not a good long-term solution. We cannot improve air and water quality by continuing to do the same old things. DNREC and the State Legislature should instead seek an environmentally sustainable solution to handling Delaware's waste.

The Delaware Solid Waste Authority (DSWA) has a comprehensive Solid Waste Management Plan (502) which includes reasonable programs and goals aimed at reducing the volume of materials directed to landfills. As stated in the plan: *"The Delaware Solid Waste Authority is committed to managing Delaware's solid waste in a way that keeps people safe and the environment clean. The DSWA Statewide Solid Waste Management Plan takes us through the year 2020, it includes a reliable system to handle Delaware's trash – for now and for the future"*. To that end, the state has made progress in managing Delaware Solid Waste Authority's three landfills via increased recycle rates and methane gas capture and use. I understand DRPI is not a state owned enterprise, and therefore not under the total control of DSWA, but it is regulated by the state, and all landfilled waste is a state environmental concern to be addressed in the context of the state's Solid Waste Management Plan.

A review of the Statewide Solid Waste Management Plan is due in 2020 (next year) and that process would be the proper forum for consideration of DRPI's role in the future of the state's waste management plan. DRPI's permit request should be evaluated in that context, and not as a standalone request.

As stated in the plan's principles...*"Zero Waste means designing and managing products and processes to systematically avoid and eliminate the volume and toxicity of waste and materials, conserve and recover all resources, and not burn or bury them"*. That is what "good" looks like, and an arbitrary move to pile more waste onto the heap does not fit that vision, and would only exacerbate Delaware's already poor water and air pollution statistics.

I ask that DNREC deny DRPI's request, or at a minimum, delay consideration until the 2020 review and upgrade of the state's Solid Waste Management Plan is complete.

Thank You,

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