

February 21, 2024

To the Delaware Department of Natural Resources and Control,

The Sierra Club Delaware Chapter would like to express our concerns with the Solid Waste Facility Permit #SW-23-10 to Scrap Tire Solutions. After reviewing the publicly available documents, we believe this permit should not be granted. The cumulative impacts of the 25-50 trucks a week, combined with the critical infrastructure on the property and the environmental justice implications of the site's proposed activities, threaten communities in Delaware and abroad.

The proximity to the Edgemoor Pump Station and Force Main as outlined in comments submitted by the New Castle County Department of Public Works is a major concern because of its importance to the public health of the area and it must be kept safe from any potential blocks or risks posed by the activities of Scrap Tire Solutions. The increase in traffic estimated by the proposed facility would create a risk to infrastructure that outweighs the benefits of the proposed permit.

Additionally, the shipping of American-made waste products to East Asia is a global environmental justice issue. To address this, there should be strict supply chain transparency about the immediate processing of the tires at their next destination to ensure that we are not shifting the environmental contamination from our region to others who did not create the waste.

For these reasons, and in solidarity with the residents sharing their concerns about the permit on January 24, 2024, we urge you to reject this permit application.

Thank you for your time and consideration,  
Marissa McClenton  
Environmental Justice Associate Organizer  
Sierra Club Delaware Chapter