

**Subject:** Public Hearing Comments

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**From:** DoNotReply@delaware.gov

**To:** HearingComments, DNREC (MailBox Resources), jbuxbaum@standrews-de.org

## Comments on Docket #2025-R-WHS-0016 -- Solid Waste Regulations

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Organization: St. Andrew's School

### Comments:

I'm a former farm worker and current Sustainability Coordinator at St. Andrew's School, an all-boarding high school in Middletown, Delaware. I'm an environmentalist, an educator, and a believer that a better, cleaner, healthier world is possible. I'm also a believer that the little things REALLY matter. Composting, to me, is the most essential tool we have as individuals and institutions to repair our relationship to the environment. Composting -- when it is done well, done right, and made possible by local laws and regulations -- is literally alchemy, allowing every person to turn their "waste" (did you know we're the only creatures on earth that produce "waste"?) into valuable, nutrient-rich, carbon-sequestering, microorganism-rich black gold. Small-scale composting requires communities to think intentionally about their waste streams and consumption habits. Composting impacts people as much as it impacts the environment. St. Andrew's houses around 320 high school students and several dozen faculty members on its campus. The dining hall provides three meals a day for 9.5 months of the year. We eat a lot of food... and a lot of food gets thrown away. Our campus also has an enormous amount of trees, some of the most spectacular trees I've ever seen. This means, every fall, more leaves than I can even believe get blown up and carted away. Trees are also constantly needing maintenance, which means we have a steady supply of wood chips, too. Food scraps + dry leaves + wood chips is THE quintessential recipe for healthy compost. But we are stymied by the composting capacity and regulatory landscape of Delaware in our efforts to put these ingredients together to make something beneficial. Without a single large scale food scrap composting facilities in Delaware, if we hope as a school community to pursue the environmental alchemy that I find so essential, we will have to do it 100% on-site. There are already so many barriers to pursuing on-site composting at scale -- time, labor, equipment, buy-in for what people (wrongly) believe will be just a big pile of rotting food. There is no reason why the regulatory landscape of DE should pose yet another barrier. Every person, community, school, and institution should be easily and costlessly able to compost their own materials. Community composting and small scale composting should be exempt from the DNREC industrial composting permit process and permit fee; Community composting and small scale composting should have a far simplified permit and registration process; and there should be no permit required to move small amounts of food scraps. It's worth re-hashing some basic facts about the food waste issue in DE: - food currently takes up nearly 25% of DE landfill space, releasing potent methane emissions - There are currently NO large scale food scrap composting facilities in Delaware - Community composting is an effective way to educate the public about composting - Small scale composting businesses

are the first step toward larger food scrap composting - small scale composting supports sustainable activities that the average person can directly contribute to and participate in that encourage responsible consumption, environmental awareness, nature stewardship, and community resilience - small scale composting encourages people to take direct action on a problem that everyone directly contributes to creating a circular economy Delaware is far behind compared to other states regarding food scrap diversion and recycling! These changes will help move Delaware forward as a leader in food waste diversion and recycling.