

## **WHY These Proposed Regulations Should Be Rejected**

### **A. These regulations continue TDEC's terrible record of environmental injustice**

1. The 'Solid Waste Task Force' which developed these regulations was all white [23 out of 23 white; 21 out of 23 white male; 20 out of 23 local solid waste managers]

2. From far East Tennessee to urban Memphis, landfills and Transfer Stations are located primarily where poor and minority live

### **B. Solid Waste is a matter of health**

1. Tennessee is a poor, unhealthy state. Landfills with methane gas and groundwater pollution create very unhealthy conditions

2. Tennessee has a worse rate of infant mortality than Cuba or Hungary.

3. America ranks 50<sup>th</sup> among all countries in longevity

### **C. Tennessee's Landfill Record Is Disastrous. These Regulations Feed Landfills**

1. From Dickson County to Coffee County to East Tennessee to Urban Memphis, Tennessee, Tennessee landfills are out of control.

2. Except for yard waste bans (2017), food waste bans (*possible 2020*) and electronic waste (*unspecified*), there no programs to reduce landfilled waste.

### **D. Solid waste should be managed as a raw material for jobs and business**

1. We can create jobs faster and quicker through recycling than we can building roads. Everything in solid waste was in use seconds before it was thrown away

### **E. 'The Solid Waste Reduction Task Force' Voted Unanimously**

1. The Task Force was the wrong way to reform Tennessee solid waste. A part time Executive Director or Environmental Consultant was needed

2. Solid waste numbers provided by local governments do not reflect reality *[if you can not count it you can not manage it]*

### **F. These Regulations Revolve Around Useless Local Reports and Likely Loop holes**

1. Once again, we see multiple level of local reporting—*expanded*.

### **G. We Need Regulations Based On Content of Solid Waste**

1. Regulations should be based on **CONTENT** of solid waste---food waste (12% of the waste stream) yard waste (13%) can generate clean methane gas and compost not dangerous landfills. Construction and demolition waste (15%–20%) can be recycled and reused. Paper/paperboard (36%), metals (9%), and plastics can be reused NOT local reports, distant goals for food & yard waste.