



**Delco Environmental Justice**  
[www.DelcoEJ.org](http://www.DelcoEJ.org)

# Philly Area's Burn Problem

The map displays the United States with numerous green 'I' icons indicating burn problem locations. These icons are densely clustered in the Northeast, particularly around the Philadelphia area, and are also scattered across the Midwest and West. Two inset maps are provided: one in the top left corner showing Alaska with a single 'I' icon, and another in the bottom left corner showing Hawaii with multiple 'I' icons. A detailed inset map of the Philadelphia area in the bottom right corner shows specific locations like King of Prussia, Philadelphia, and Cherry Hill, with major highways like I-276 and I-95 labeled.

[www.ejmap.org](http://www.ejmap.org)

# Philly Area's Burn Problem

A map of the United States with numerous green pin icons, each containing a white letter 'I', indicating locations with burn problems. The pins are distributed across the country, with a high concentration in the Northeast, particularly around the Philadelphia area. Two inset maps provide more detail: one in the top left shows Alaska with a pin near Anchorage, and one in the bottom right shows the Philadelphia area with pins near King of Prussia, Philadelphia, and Cherry Hill. The map includes state and provincial names, major cities, and the Gulf of California and Gulf of Mexico.

[www.ejmap.org](http://www.ejmap.org)

# Municipal Solid Waste Collection in Delaware County, PA



Residential

Commercial

Industrial



Recycling delivered to material  
recovery facilities (MRFs) to  
sort and sell to private markets

Recyclables



1/3 Waste  
Delivered  
Directly

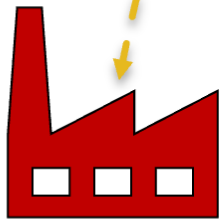


3 small trucks  
↓  
1 big truck



Transfer Station #1  
(Chester Township)

Transfer Station #3  
(Broomall, Marple Township)



Reworld (Covanta)  
Trash Incinerator

(Chester City, Delaware County)



85% goes to the  
incinerator

2/3 of Delco's waste collected  
is transferred at DCSWA's  
two transfer stations



Incinerator Ash (about 25-30% of the tons  
burned remain as ash) hauled by WM  
(Waste Management) to the landfill



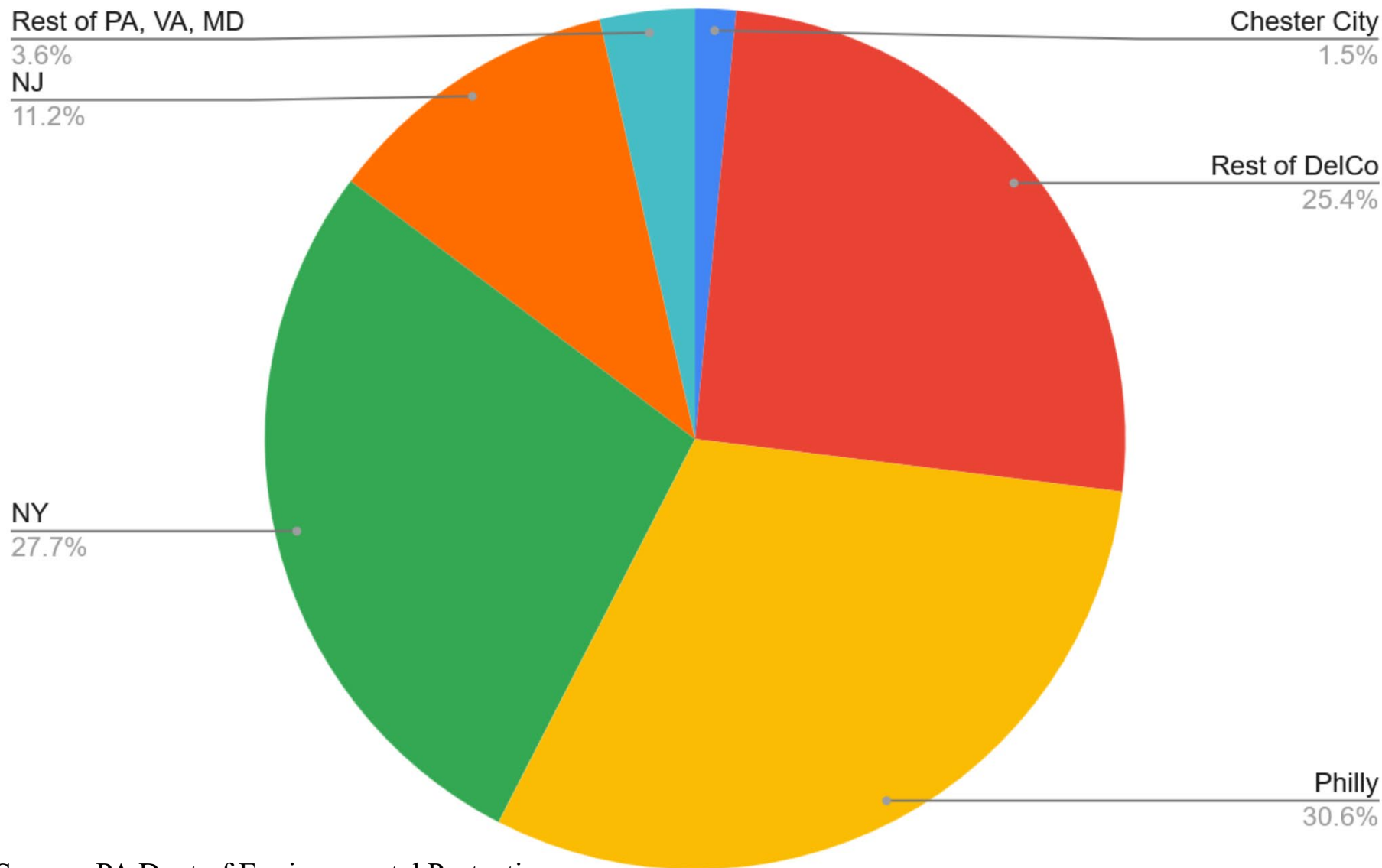
15% bypassing incinerator  
since Jan 2023

Berks County &  
Montgomery County Waste



Rolling Hills Landfill  
(Earl Township, Berks County)

# Waste Burned at Reworld Incinerator in Chester (2024)



Source: PA Dept of Environmental Protection

[http://cedatareporting.pa.gov/reports/powerbi/Public/DEP/WM/PBI/Solid\\_Waste\\_Disposal\\_Information](http://cedatareporting.pa.gov/reports/powerbi/Public/DEP/WM/PBI/Solid_Waste_Disposal_Information)



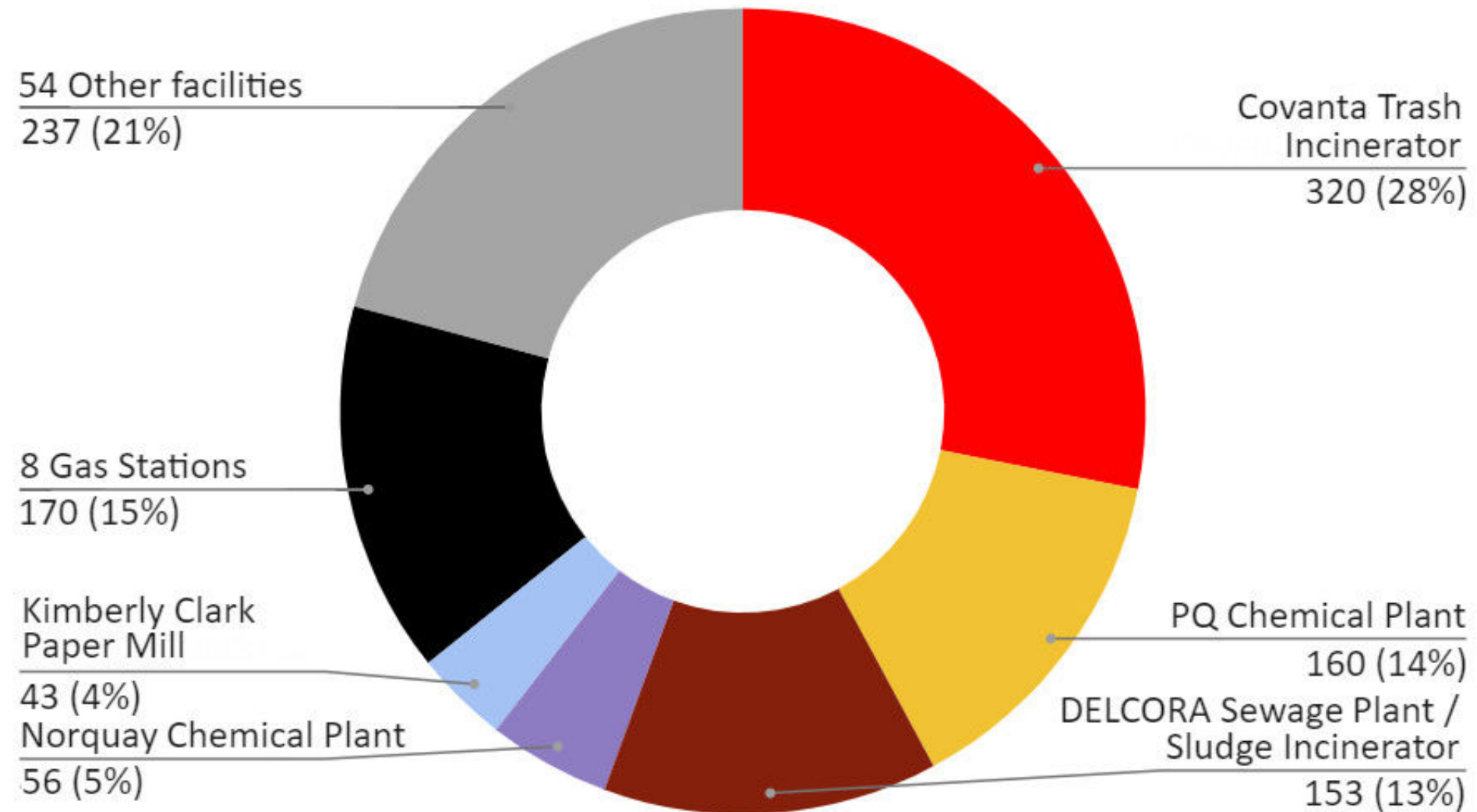




# Largest waste incinerator in the U.S.

St	City	Facility Name	Units	Tons/day
PA	Chester	<a href="#">Reworld Delaware Valley</a>	6	3,510
FL	St. Petersburg	<a href="#">Pinellas County Resource Recovery Facility</a>	3	3,150
VA	Lorton	<a href="#">Reworld Fairfax</a>	4	3,000
FL	West Palm Beach	<a href="#">Palm Beach Renewable Energy Facility 2</a>	3	3,000
HI	Honolulu	<a href="#">Honolulu Resource Recovery Venture / H-POWER</a>	3	3,000
NY	Westbury	<a href="#">Hempstead Resource Recovery Facility</a>	3	2,850
NJ	Newark	<a href="#">Essex County Resource Recovery Facility</a>	3	2,800
MA	West Wareham	<a href="#">SEMASS Resource Recovery Facility</a>	3	2,700
CT	Bridgeport	<a href="#">WIN Waste Bridgeport</a>	3	2,250
FL	Ft. Lauderdale	<a href="#">Wheelabrator South Broward</a> (FCC Environmental)	3	2,250
MD	Baltimore	<a href="#">WIN Waste Baltimore / BRESKO</a>	3	2,250
NY	Niagara Falls	<a href="#">Reworld Niagara</a>	2	2,250
NY	Peekskill	<a href="#">WIN Waste Westchester</a>	3	2,250

# Environmental Violations at Chester City Facilities (June 2005 – August 2021)





# Trash Incineration & Environmental Racism



# Trash Incineration & Environmental Racism

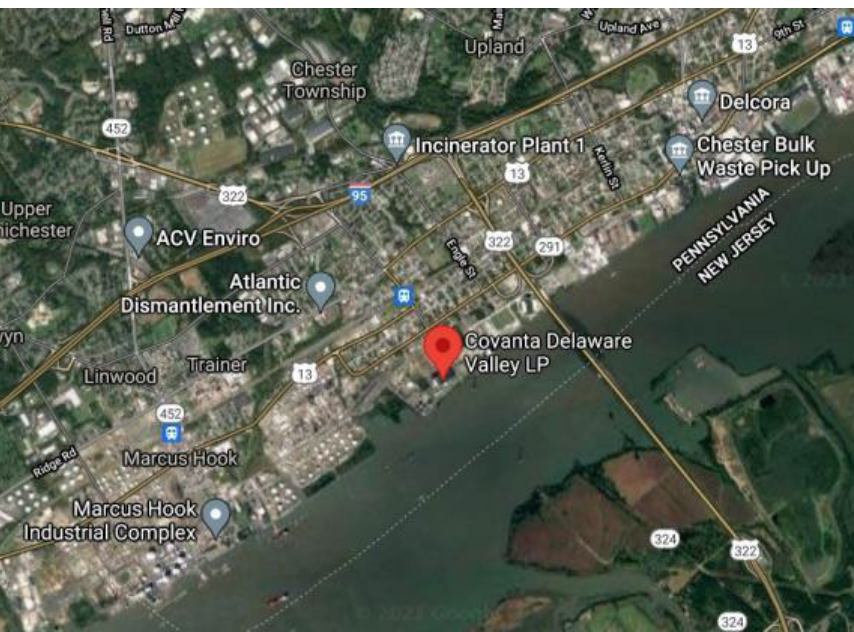
- 63% of the 62 commercial-scale trash incinerators still operating in the U.S. as of August 2025 sit in majority white communities, but...
- The largest incinerators are in more urban communities, causing the whole industry to be disproportionately impacting people of color
- 14 of 20 largest incinerators in BIPOC communities
- Black people most disproportionately impacted
- Trash incinerators in BIPOC communities are surrounded by 2.5 times as many people and are twice as large as those in white communities

[www.energyjustice.net/incineration/ej](http://www.energyjustice.net/incineration/ej)

# Demographics around Covanta & DCSWA Rolling Hills Landfill

Facility	People living within 2.5 miles		
	Population	Household Income	Demographics
DCSWA's Rolling Hills Landfill	2,283	\$73K	96.8% White
Covanta Delaware Valley incinerator	23,000	\$30K	63.8% Black

Census data from [JusticeMap.org](https://www.justicemap.org/)



← Covanta Delaware Valley trash incinerator

DCSWA Rolling Hills Landfill →





# Covanta (now “Reworld”) is a Top Air Polluter

Their trash incinerator in Chester is the:

#1 industrial air polluter in Chester City, in Delaware County, and in the entire 7-county region surrounding Philadelphia.

All five trash incinerators in this region are among the region’s top seven industrial air polluters.



Source: PA Department of Environmental Protection Agency Air Emissions Reports:  
[http://cedatareporting.pa.gov/reports/powerbi/Public/DEP/AQ/PBI/Air\\_Emissions\\_Report](http://cedatareporting.pa.gov/reports/powerbi/Public/DEP/AQ/PBI/Air_Emissions_Report)



# Reworld Delaware Valley's Air Emissions

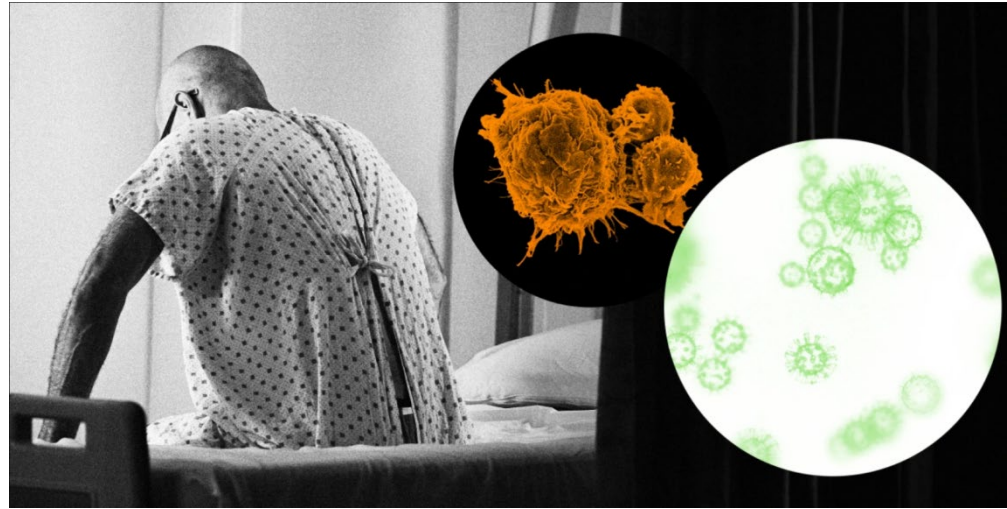
<b>Pollutant</b> (in pounds except CO <sub>2</sub> e)	<b>2022 Emissions*</b>	<b>Rank in DelCo</b>	<b>Health Effects</b>
<b>Global Warming Pollution</b> (in tons of CO <sub>2</sub> equivalents)	914,738	4	Extreme weather, disease, crop damage, species extinction
<b>Nitrogen Oxides</b>	2,320,920	1	Asthma attacks, chronic respiratory disease & stroke
<b>Carbon Monoxide</b>	673,400	1	Headaches, dizziness; increases lifetime risk of heart disease
<b>Sulfur Dioxide</b>	392,820	1	triggers asthma attacks; chronic respiratory and heart diseases; stroke
<b>Particulate Matter</b>	126,080	4	heart attacks, stroke, irregular heartbeat, aggravated asthma, decreased lung function, difficulty breathing
<b>Hydrochloric Acid</b>	37,740	1	irritates eyes, skin, and nose, damages lungs
<b>Fine Particulate Matter (PM<sub>2.5</sub>)</b>	15,140	5	same as above, but worse, gets deep into lungs and into blood stream
<b>Volatile Organic Compounds</b>	13,700	15	eye, nose and throat irritation, headaches, loss of coordination and nausea, liver, kidney and central nervous system damage, cancer
<b>Mercury</b>	51	1	damage to nervous, digestive, & immune systems, lowers IQ
<b>Nickel</b>	20	3	allergy, cardiovascular and kidney diseases, lung fibrosis, lung and nasal cancer
<b>Lead</b>	17	2	damages nervous system and kidneys, lowers IQ, increases likelihood of antisocial behavior
<b>Cadmium</b>	5	2	kidney disease; lung cancer
<b>Arsenic</b>	4	2	lung, skin, bladder, and liver cancers; irritation of skin and mucous membranes; affects brain and nervous system
<b>Chromium (VI)</b>	4	2	lung cancer, shortness of breath, coughing, and wheezing

All is 2022 data except cadmium, arsenic, and chromium (VI), which is 2016-2019 average for lack of 2022 data. Source: PA Department of Environmental Protection Air Emissions Report: [http://cedatareporting.pa.gov/reports/powerbi/Public/DEP/AQ/PBI/Air\\_Emissions\\_Report](http://cedatareporting.pa.gov/reports/powerbi/Public/DEP/AQ/PBI/Air_Emissions_Report)

# Health effects

**People living near incinerators have an increased risk of...**

- **All types of cancer, including:**
  - Stomach
  - Colorectal
  - Liver
  - Renal
  - Lung & pleural
  - Gallbladder
  - Bladder
  - Non-Hodgkin lymphoma
  - Leukemia
  - Soft-tissue sarcoma
- **Respiratory diseases & symptoms**
- **Cardiovascular diseases**
- **Urinary diseases**



**Covanta: “incinerators have been studied comprehensively for health risk”**

**Fact: Not much in the U.S. and not comprehensively at all.**

# Covanta Lacks Basic Pollution Controls

In March 2009, when an EPA inspector (Ms. Horgan) asked Covanta's Gene Bonner why they don't have the pollution controls that their other plants have, Covanta responded that "it costs a lot of money" and would create "operational issues."

Ms. Horgan asked if there is any control equipment that would be practical to reduce emissions. Mr. Bonner stated that practical is a matter of money to business people. He stated that Covanta doesn't have a big issue for dioxins or mercury so a carbon system is not needed. Ms. Horgan asked about additional NO<sub>x</sub> control. Ms. Horgan mentioned that NO<sub>x</sub> emissions were 1119 tons in 2003 and 1257 tons in 2005. Ms. Horgan asked if there was a system to bring down these NO<sub>x</sub> emissions. Mr. Bonner stated that putting in a urea system would; but, that it costs a lot of money and also introduces additional operational issues. He stated that the more equipment that is added, the more potential for operational issues at some time. He said that the NO<sub>x</sub> emissions could be brought down; but, the equipment is not easily operated.

# Covanta Lacks Basic Pollution Controls

Covanta's incinerator in Chester uses the fewest pollution control devices of any incinerator in Pennsylvania and the fewest of any in their fleet of 32 remaining incinerators.

## LACKING:

- **Selective Catalytic Reduction (SCR) or Selective Non-Catalytic Reduction (SNCR)** to reduce the nitrogen oxides (NO<sub>x</sub>) that trigger asthma attacks.
  - SNCR recently installed, cutting NO<sub>x</sub> from 128 ppm to ~90 ppm; SCR would be 30-40 ppm
- **Carbon injection** to remove additional toxic metals and dioxins.

## HAS:

- **Spray Dryer Absorber (scrubber)** – injects lime to reduce acid gases, heavy metals and organic pollutants
- **Fabric Filter (baghouse)** – captures particulate matter (soot)



# Covanta's 2023 SNCR presentation:

19 slides about NO<sub>x</sub> and not a single mention of asthma...



# Nitrogen Oxide (NO<sub>x</sub>) POLLUTION from Trash Incineration

The Wheelabrator Baltimore trash incinerator is the city's #1 source of nitrogen oxide air pollution which triggers asthma attacks. Closing the incinerator is equal to removing half the cars or half the trucks from Baltimore's roads.

**205 parts per million (ppm)**

Wheelabrator Baltimore trash incinerator's existing permit limit

**170 ppm**

New state regulation originally considered

**166 ppm**

Wheelabrator's average in recent years

**150 ppm**

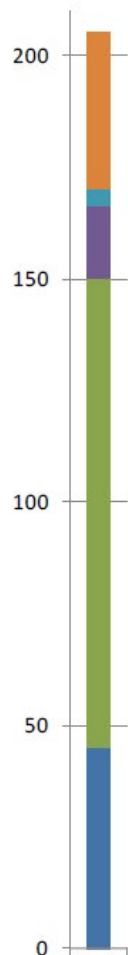
New state regulation (final)

PPM (parts per million) refers to the allowable concentration of NO<sub>x</sub> coming out of the incinerator smokestack.

**45 ppm**

Permit limit for new incinerators

- Limit sought by Oct 2017 Baltimore City Council resolution (*ignored by state!*)
- Limit required by Baltimore Clean Air Act
- Limit met by new incinerator in West Palm Beach, Fla.
- Limit set by MD in two permits issued for proposed incinerators that were defeated since 2014 (*Energy Answers in Baltimore and Wheelabrator in Frederick*)



## In Chester...

**205 ppm – old federal limit**

**180 ppm – old permit limit**

**116 ppm – avg before SNCR**

**110 ppm – new limit**

**~90 ppm – new average**

**45 ppm – modern limit  
(requires SCR)**

# 2024 AsthmaCapitals

The Most Challenging Places  
to Live with Asthma

## Philadelphia Metro Area ranked...

#4 in 2018

#4 in 2019

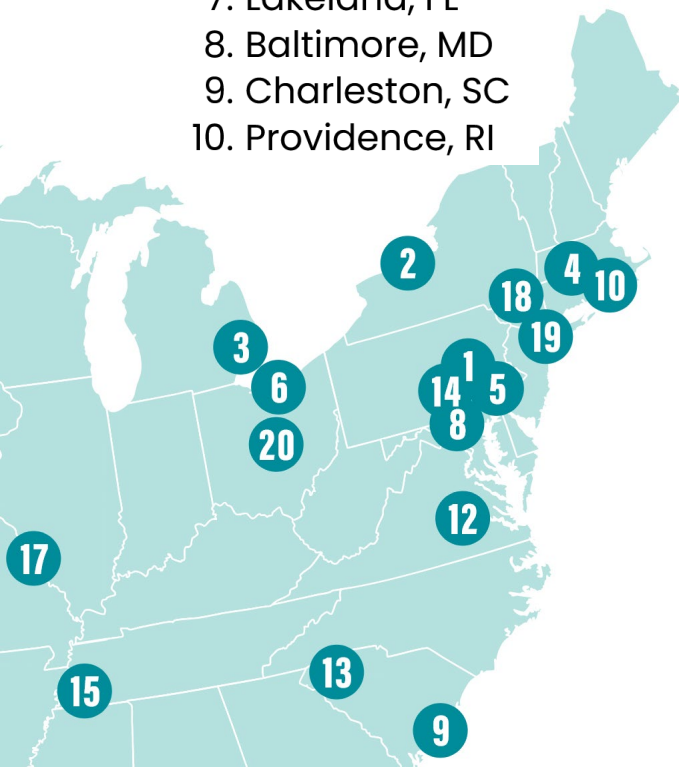
#7 in 2021

#9 in 2022

#8 in 2023

#5 in 2024

1. Allentown, PA
2. Rochester, NY
3. Detroit, MI
4. Springfield, MA
5. Philadelphia, PA
6. Cleveland, OH
7. Lakeland, FL
8. Baltimore, MD
9. Charleston, SC
10. Providence, RI

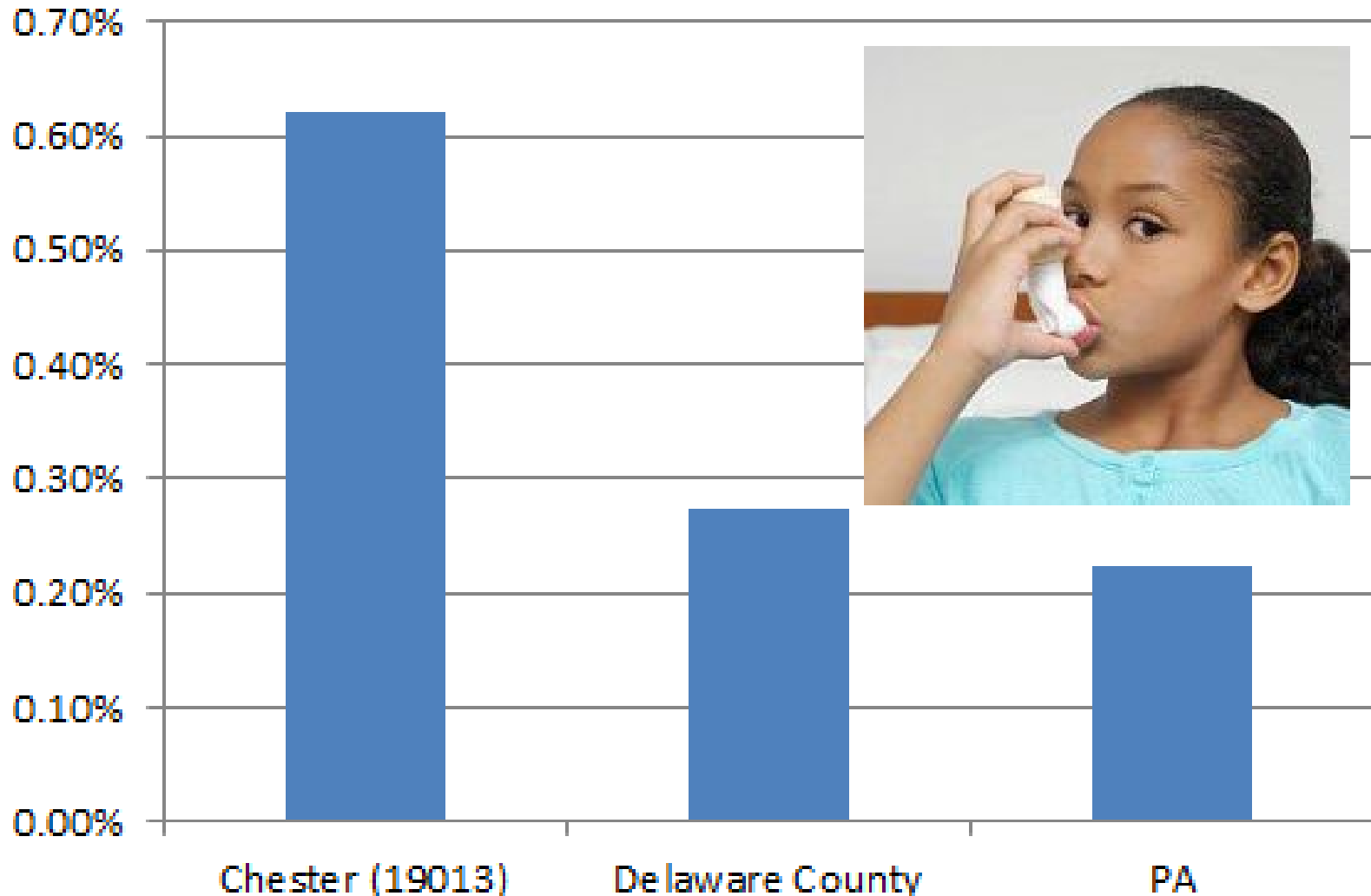


Asthma and Allergy  
Foundation of America

[www.aaafa.org/asthma-capitals/](http://www.aaafa.org/asthma-capitals/)

# Childhood asthma hospitalization 3x PA rate

Data for those under 18 years of age, for 2010



Source: Analysis based on 2010 Census data and asthma data from The Asthma Program, PA Department of Health.  
Data provided by Pennsylvania Health Care Cost Containment Council (PHC4).



# Is incineration a problem in general?

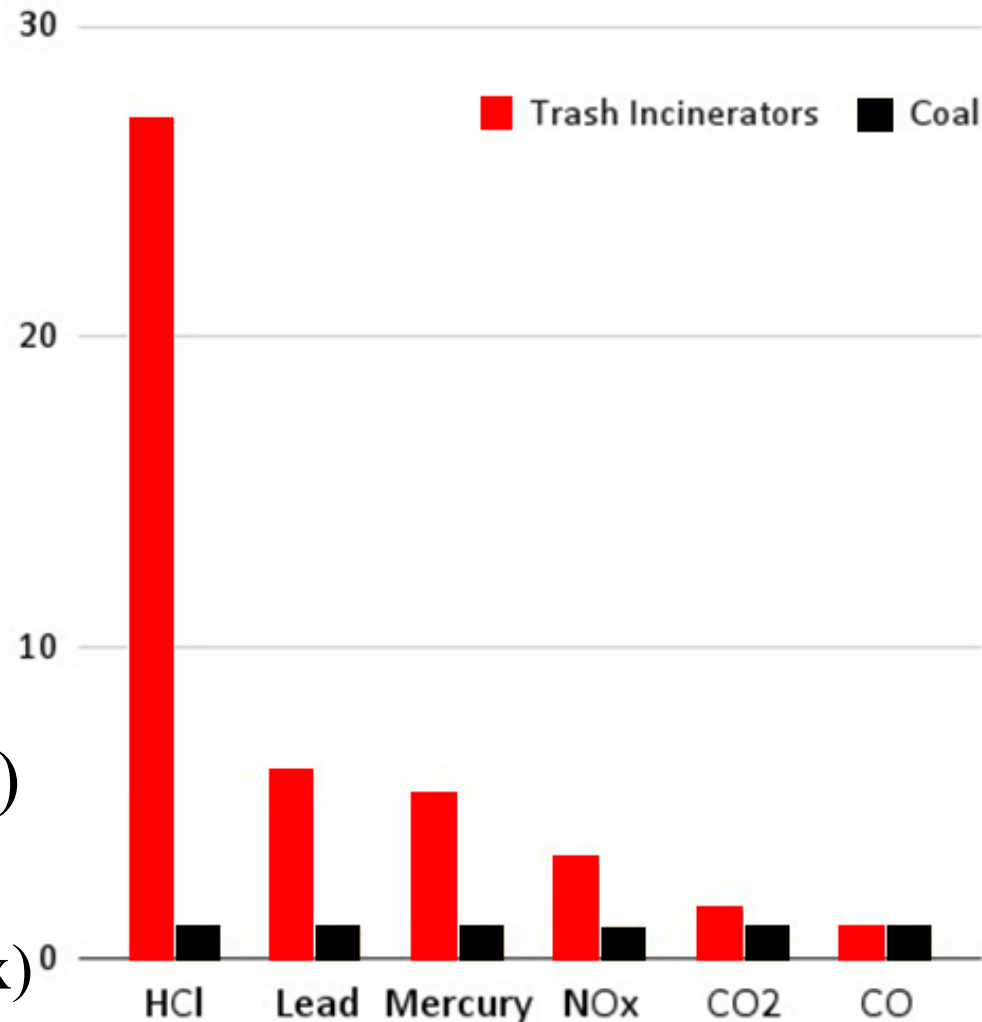


[www.EnergyJustice.net/incineration/](http://www.EnergyJustice.net/incineration/) ← find a ton more info here!

# Incineration Worse than Coal

- **Dioxins / furans (28x)**
- **Hydrochloric Acid (27x)**
- **Lead (6x)**
- **Mercury (5x)**
- **Nitrogen Oxides (3x)**
- **Carbon Dioxide (1.65x)**
- **Carbon Monoxide (same)**
- *----- ...exceptions... -----*
- **Fine Particulate Matter (.53x)**
- **Sulfur Dioxide (0.36x)**

Number of times trash incineration  
is more polluting than coal

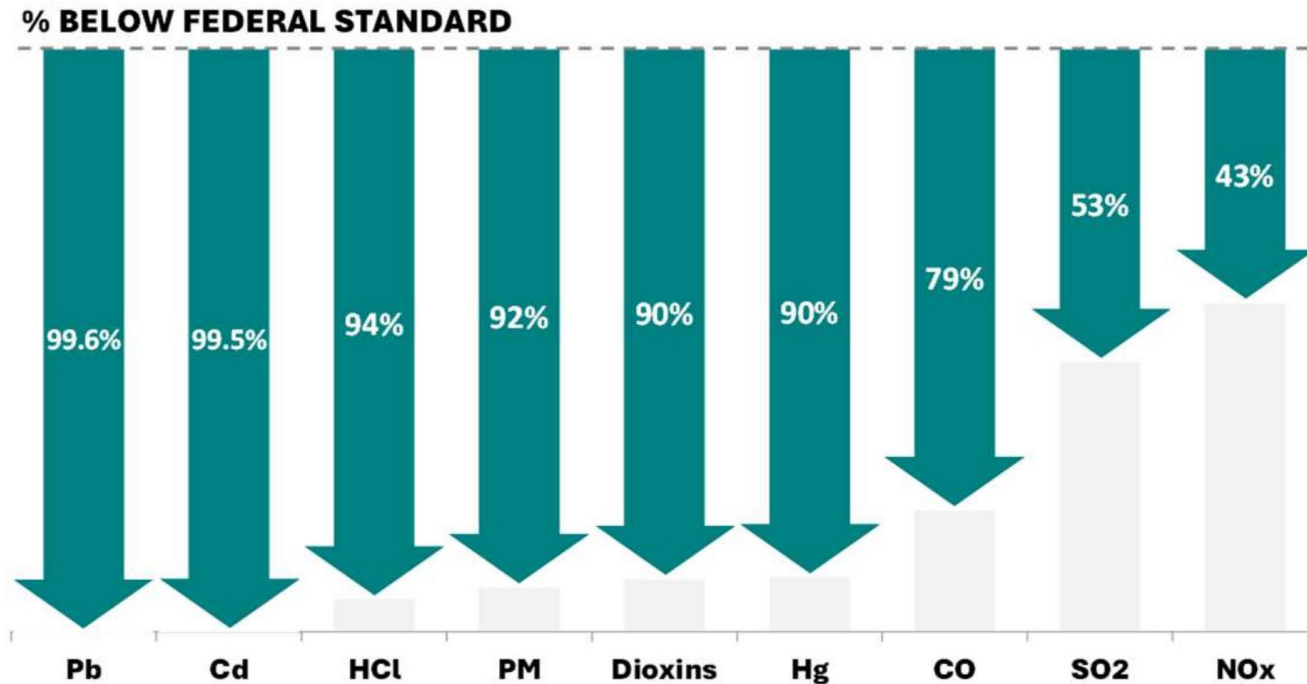


[www.energyjustice.net/incineration/worsethancoal](http://www.energyjustice.net/incineration/worsethancoal)

# Environmental Compliance

up to  
**99.6% below**  
Federal emissions  
standards, based on  
annual averages\*\*

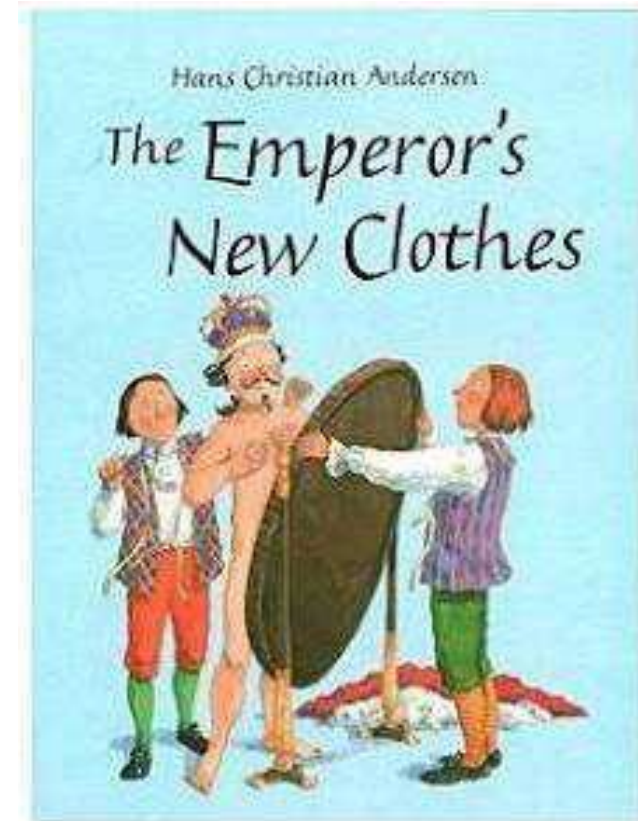
**100%  
compliant**  
with Continuous Emissions  
Monitoring (CEMS) standards



Covanta: “We monitor continuously for all of our CEM parameters...”

# The Smokestack Story

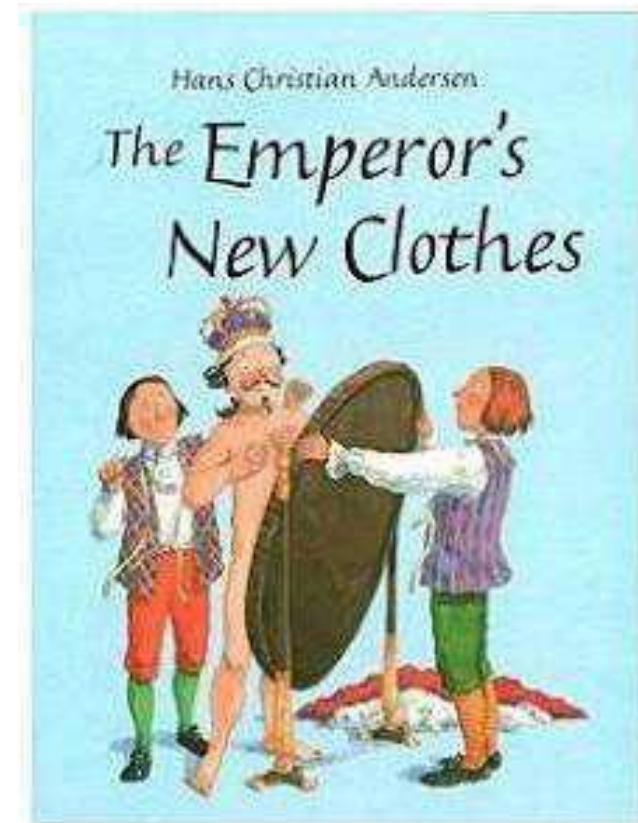
- Continuous Emissions Monitors (CEMs) tell all
- Rigorous enforcement by the state
- Emissions limits = health & safety





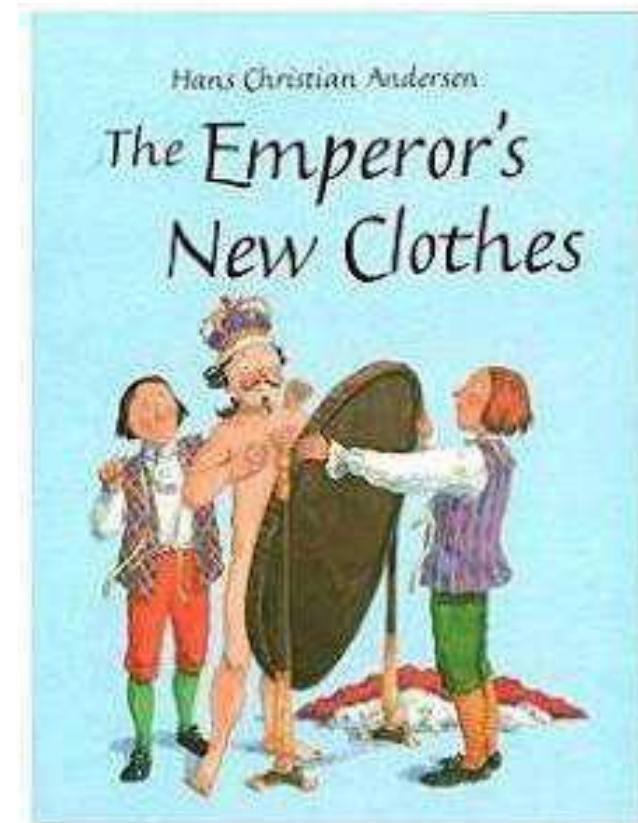
# The Smokestack Story

1. **Covanta not always within permit limits. Fines not enough.**
2. **Cannot meet modern limits, at least for NO<sub>x</sub>.**
  - **Emissions limits are stricter for new facilities and for those in other countries.**
  - **EPA is supposed to update standards every 5 years and hasn't done so for 16 years now.**
3. **Permit limits are not based on health and safety, but are technology-based.**

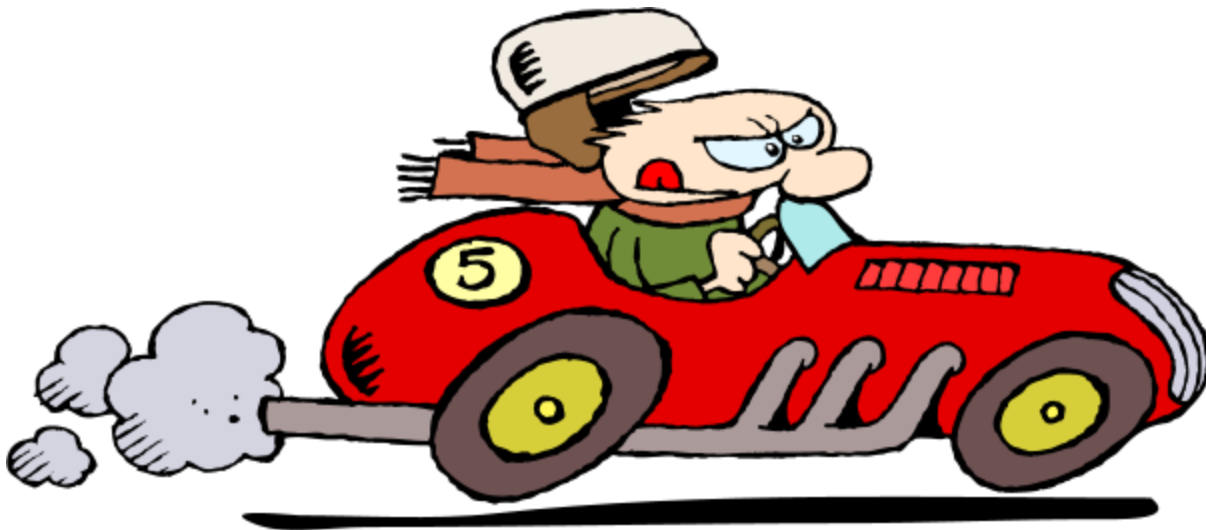


# The Smokestack Story

4. Permit limits are concentration-based. Bigger means they can be dirtier.
5. Covanta has rigged stack tests AND continuous monitoring.
6. No safe dose of lead, mercury, dioxins, radiation, fine particulate matter, etc.
7. Only 3 pollutants monitored continuously. Emissions underestimated when tested once a year by their own contractor.



# Continuous Emissions Monitors



[www.ejnet.org/toxics/cems](http://www.ejnet.org/toxics/cems)

# Continuous Emissions Monitors

- Only generally used for 3 pollutants: sulfur oxides (SO<sub>x</sub>), nitrogen oxides (NO<sub>x</sub>) and carbon monoxide (CO) plus opacity, oxygen and temperature
- Hydrochloric acid emissions 62% higher
- Actual dioxin emissions 32-52; 460-1,290 times higher
- Technology now exists to continuously monitor:

Ammonia (NH<sub>4</sub>)

Carbon Dioxide (CO<sub>2</sub>)

Hydrogen Sulfide (H<sub>2</sub>S)

Acid Gases:

Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>)

Hydrofluoric Acid (HF)

Hydrochloric Acid (HCl)

Products of Incomplete Combustion (PICs):

Dioxins & Furans

Polycyclic Aromatic Hydrocarbons (PAHs)

Volatile Organic Compounds (VOCs)

Particulate Matter (PM)

Metals:

Antimony (Sb)

Arsenic (As)

Barium (Ba)

Cadmium (Cd)

Chromium (Cr)

Lead (Pb)

Manganese (Mn)

Mercury (Hg)

Silver (Ag)

Nickel (Ni)

Zinc (Zn)

...and more



# Covanta: we provide “landfill-free disposal”

Covanta’s toxic ash being dumped at the Delaware County Solid Waste Authority’s Rolling Hills Landfill in Berks County:



# Landfilling vs. Incineration



**...and Ash Landfilling**

# How to Compare?

- **Human health impacts**
  - Nitrogen Oxide emissions (asthma)
  - Particulate emissions
  - Toxic and Cancer-causing emissions
- **Eutrophication**
- **Acidification (acid rain...)**
- **Ecosystem toxicity**
- **Ozone depletion**
- **Smog formation**
- **Global warming**

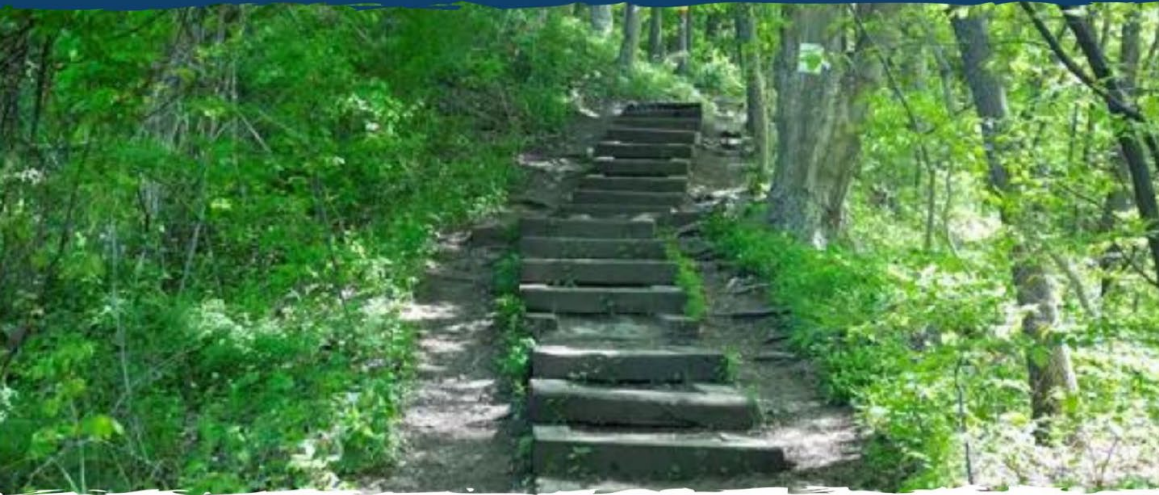
Should also look at...

- **Cost**
- **Jobs**
- **Population impacted**
- **Environmental justice**





# Delaware County's Path Toward Zero Waste



*NPS/Michael Cuff*

Delaware County, Pennsylvania  
Municipal Waste Management Plan 2023-2033  
Non-Substantial Revision

Office of Sustainability  
March 2024



Delaware County, PA is home to the nation's largest waste incinerator, in the City of Chester. It is the largest industrial air polluter in the county, and the county is now moving away from incineration.

The county's Zero Waste Plan includes a comprehensive life cycle analysis (LCA) of incineration vs. landfilling vs. zero waste.

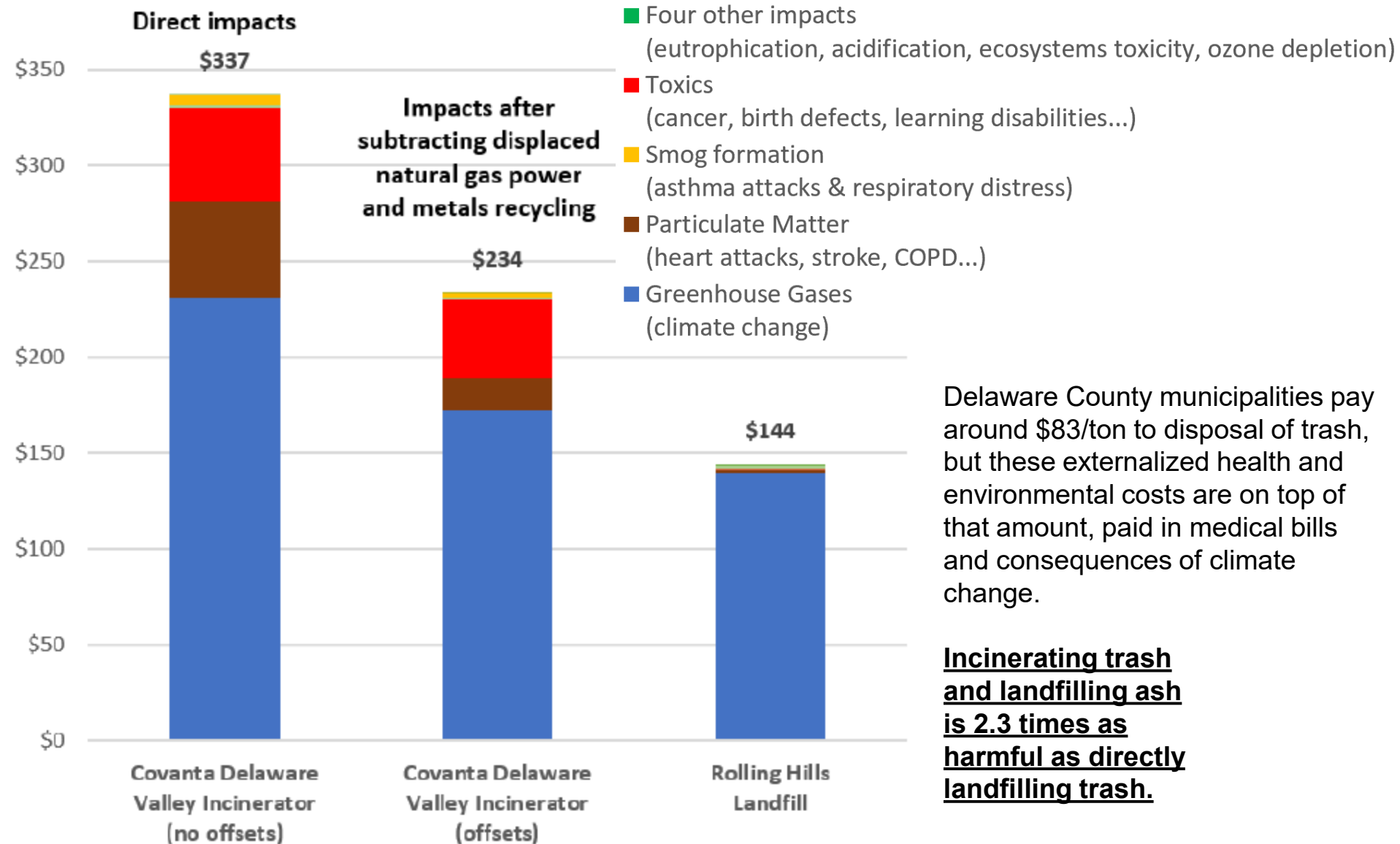
Find the draft plan [here](#) and the LCA summary and full writeup [here](#).

Results on the next few slides.



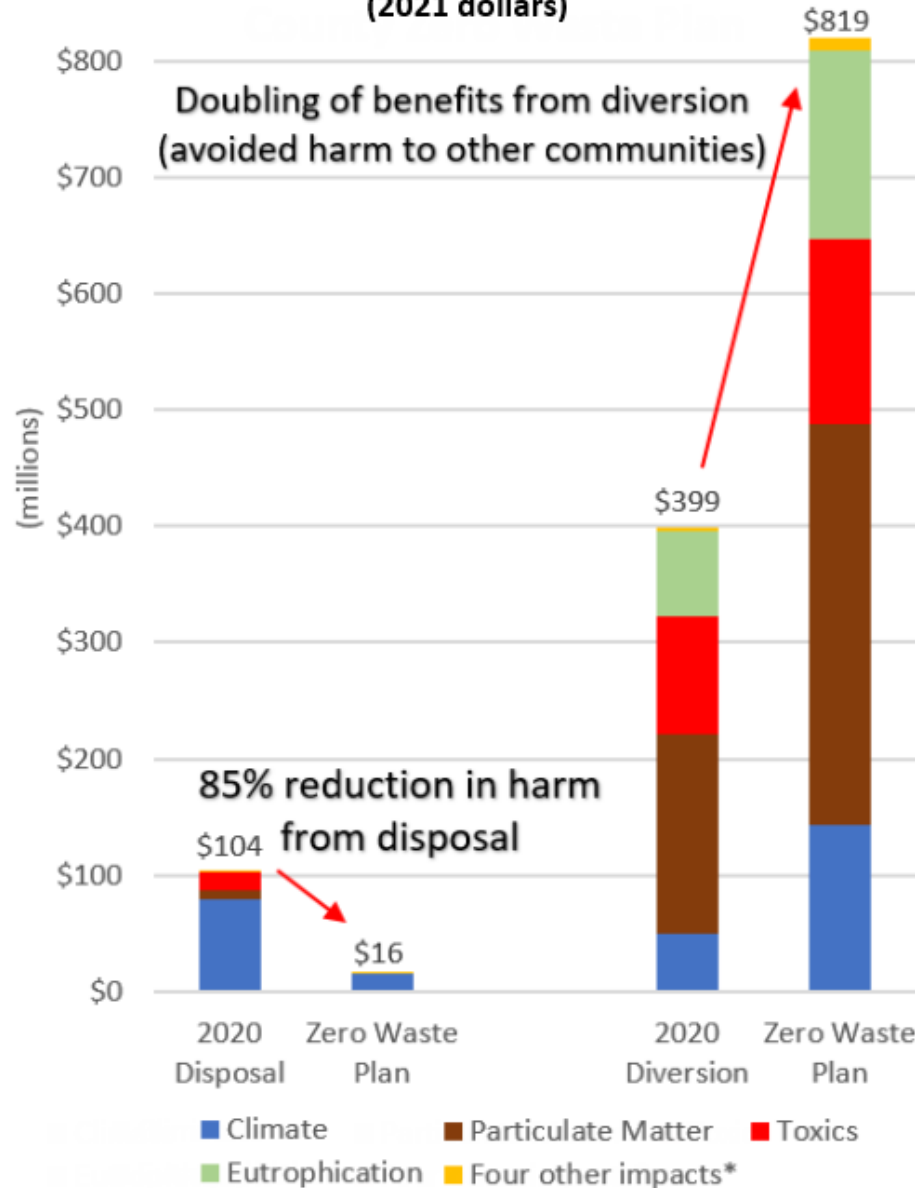
# Incineration vs. Landfilling

Health & Environmental Impacts per Ton  
of Waste Disposed at Covanta Delaware Valley Incinerator vs.  
Rolling Hills Landfill



# Annual Health and Environmental Impacts of Implementing Delaware County Zero Waste Plan

(2021 dollars)



\* Acidification, ecosystems toxicity, ozone depletion, and smog formation

85% reduction of disposal impacts from a combination of diverting materials from disposal, and switching from incineration (and landfilling ash) to direct use of landfilling.

While the last chart looked at externalized health and environmental costs per ton, this looks at the entire impact of Delaware County's waste system (all tons in a year), showing \$104 million dollars of health and environmental costs per year.

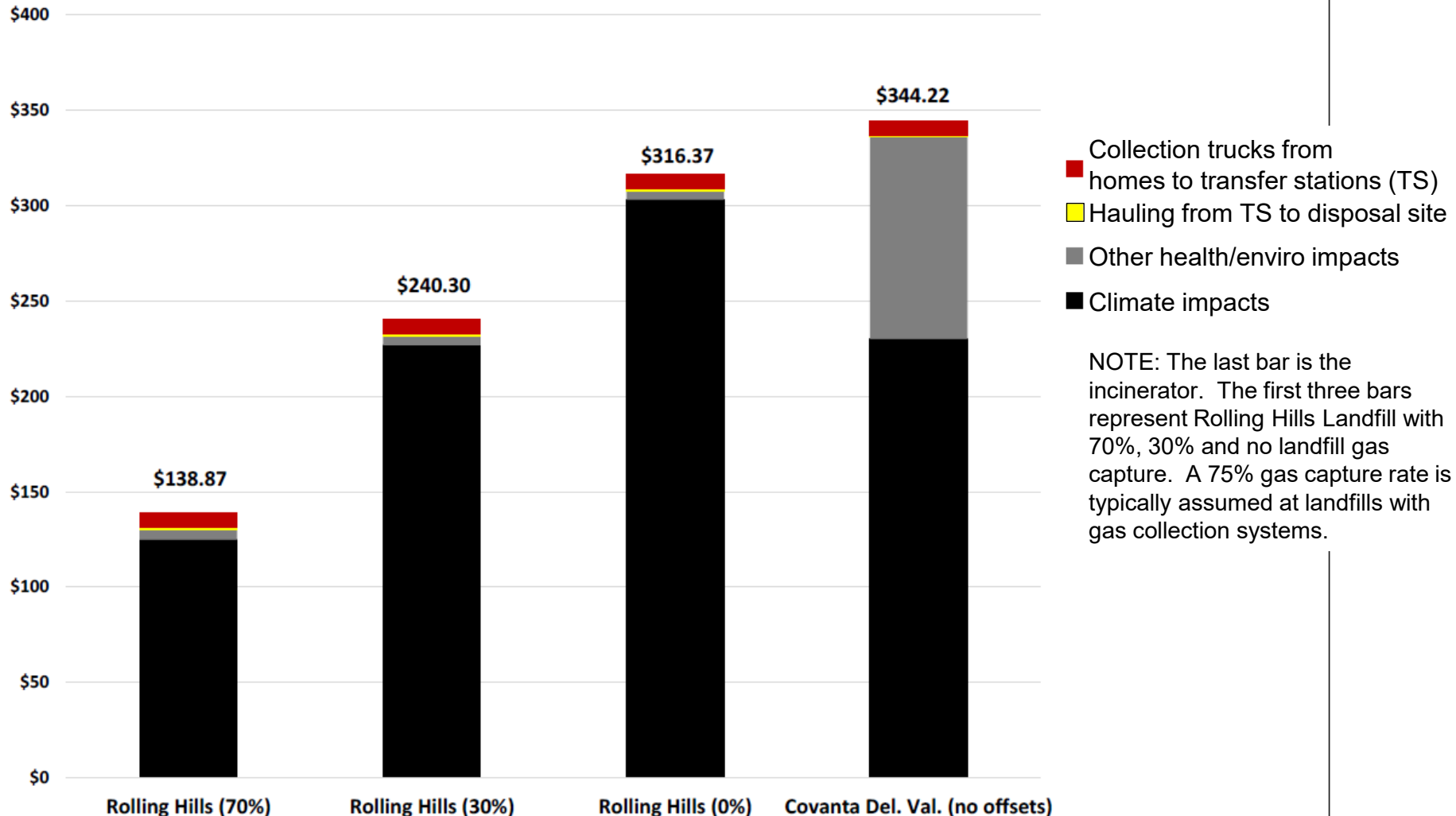
Adopting the Zero Waste Plan (ending incineration and reducing waste) cuts those harms by 85%, while the benefits (avoided harms) that already happen from current recycling efforts (about \$400 million a year) would be doubled.

Examples of these avoided harms are not needing to log or mine new raw materials because we're now consuming less, reusing/repairing, recycling and composting.

# Transportation Impacts Insignificant

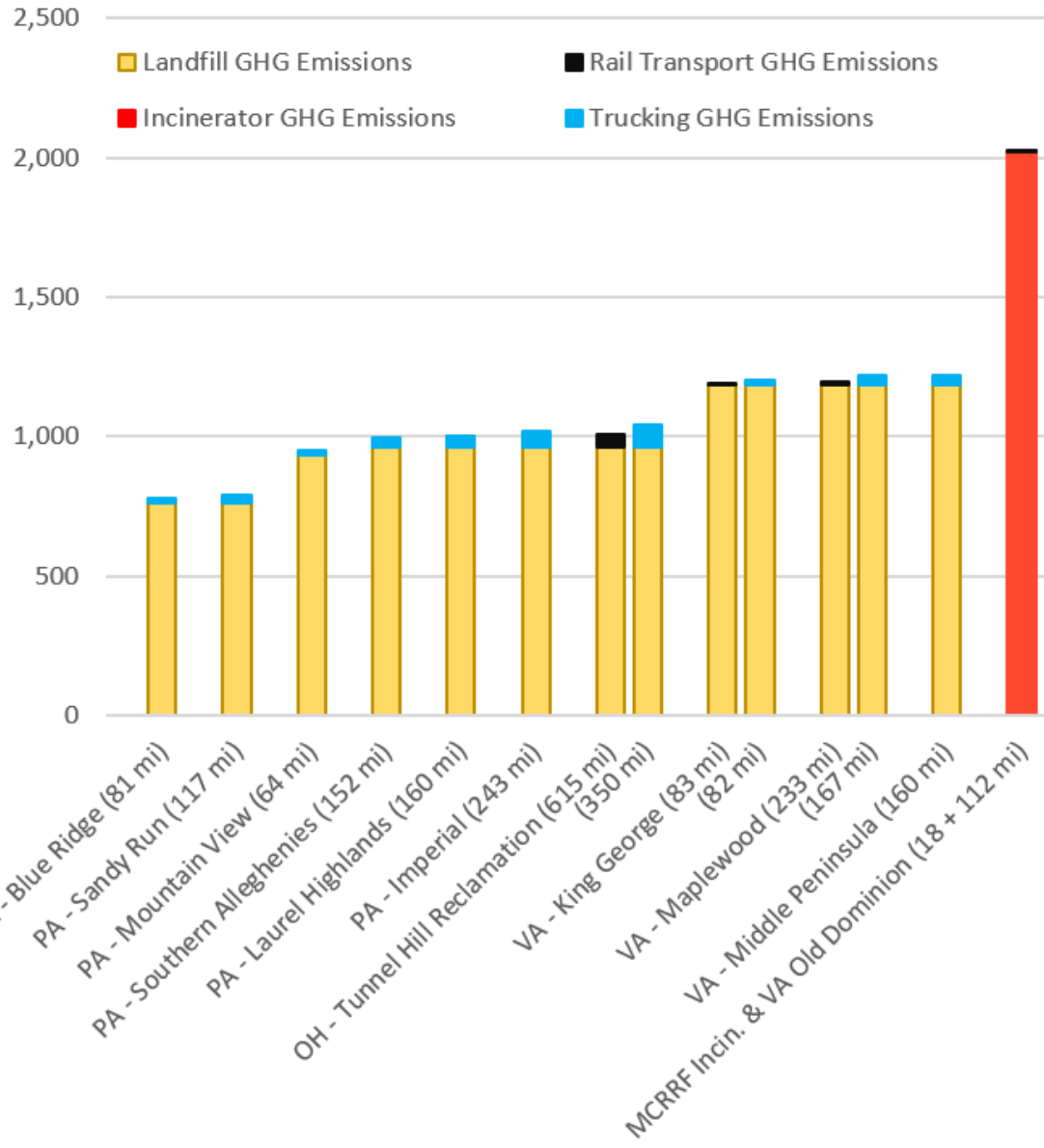
Yellow lines show difference between hauling from two transfer stations 3 and 13 miles from the incinerator (last bar) vs. trucking all trash to landfill 60 miles away (first 3 bars)

Human & Environmental Health EEV Costs for MSW Collection, Hauling, & Disposal  
Rolling Hills at Three LFG Capture Rates & Covanta Delaware Valley with No Offsets  
EEV Costs Per Ton for 2020 Delaware County MSW disposal (2021 dollars)



# Transportation Impacts Insignificant

## 20-year CO<sub>2</sub>e (lbs/ton of waste disposed)



Transportation climate impacts (blue/black) are minor compared to incineration (red) or landfilling (yellow), and no realistic transportation distance can justify incinerating in-county over hauling waste to distant landfills.

Source: Life Cycle Analysis (LCA) from 2021 report, "Beyond Incineration: Best Waste Management Strategies for Montgomery County, Maryland" [www.energyjustice.net/md/moco](http://www.energyjustice.net/md/moco)

## Beyond Incineration:

Best Waste Management Strategies for Montgomery County, Maryland

Prioritizing:

- Cost-effectiveness
- Human health & safety
- Climate protection
- Continuous waste reduction

Prepared for:

County Executive Marc Elrich

By: Zero Waste Montgomery County

Underwritten by:

Sugarloaf Citizens' Association  
[www.sugarloaforcitizens.org](http://www.sugarloaforcitizens.org)



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Jeffrey Morris, Ph.D.	Sound Resource Management Group
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Neil Seldman, Ph.D.	Institute for Local Self-Reliance

March 2021

[www.energyjustice.net/md/beyond.pdf](http://www.energyjustice.net/md/beyond.pdf)





# Philly's Waste Contracts

Summer 2019:

- Covanta – 1/3<sup>rd</sup> of Philly's trash
- Waste Management – 2/3<sup>rd</sup>s of Philly's trash

Both contracts are 4 years plus three 1-year renewal options

Approximately the same price.

**Contract expires 6/30/2026**



# City of Philadelphia

**BILL NO.** \_\_\_\_\_  
**Introduced** \_\_\_\_\_, 2025

**Councilmember** \_\_\_\_\_

\_\_\_\_\_  
**Referred to the Committee**  
**on** \_\_\_\_\_

## **AN ORDINANCE**

Amending Title 17 of The Philadelphia Code, entitled “Contracts and Procurement,” by adding language to bar the City from contracting with companies that cause the city’s municipal solid waste or recyclables to be incinerated; all under certain terms and conditions.

### **Waste Contracting for Clean Air Act**

*THE COUNCIL OF THE CITY OF PHILADELPHIA HEREBY ORDAINS:*

SECTION 1. Title 17 of The Philadelphia Code is hereby amended to read as follows:

TITLE 17. CONTRACTS AND PROCUREMENT.

# [www.PhilllyZeroWaste.org/sign](http://www.PhilllyZeroWaste.org/sign)

## Sign-on to End Philly Waste Incineration

July \_\_, 2025

Re: Philadelphia Waste Contracts

Dear Mayor Parker:

Philadelphia's Sanitation Department is currently considering new contracts for where our city's trash will go for the next seven years. We write to urge you to instruct the Sanitation Department NOT to award any contracts for burning our trash.

Burning trash and landfilling toxic ash is the most expensive and polluting way to manage waste or to make energy. It's dirtier than coal power plants and is more polluting than landfilling our waste directly without burning it first. For every 100 tons burned, 30 tons end up as toxic ash that still is dumped in landfills, making landfills smaller, but more toxic. The other 70 tons come out of incinerator smokestacks, contributing to air pollution and related health problems.

Since 2019, under our current contracts with Covanta and Waste Management, 39% of the city's trash has been sent to incinerators; the rest to landfills. In 2024, it was just under 37%. All three Pennsylvania incinerators we use – in Delaware, Montgomery, and Bucks Counties – are among the top five industrial air polluters in the five-county Philadelphia area. The top air polluter is the one in Chester, which accepts the lion's share of the trash our city burns.

We are concerned about this incineration contract for several reasons:

Health: the three incinerators surrounding Philadelphia are among the region's four largest emitters of nitrogen oxide (NOx) pollution which triggers asthma attacks. Asthma is a leading cause of missed school and work days, and is a serious problem for our city.

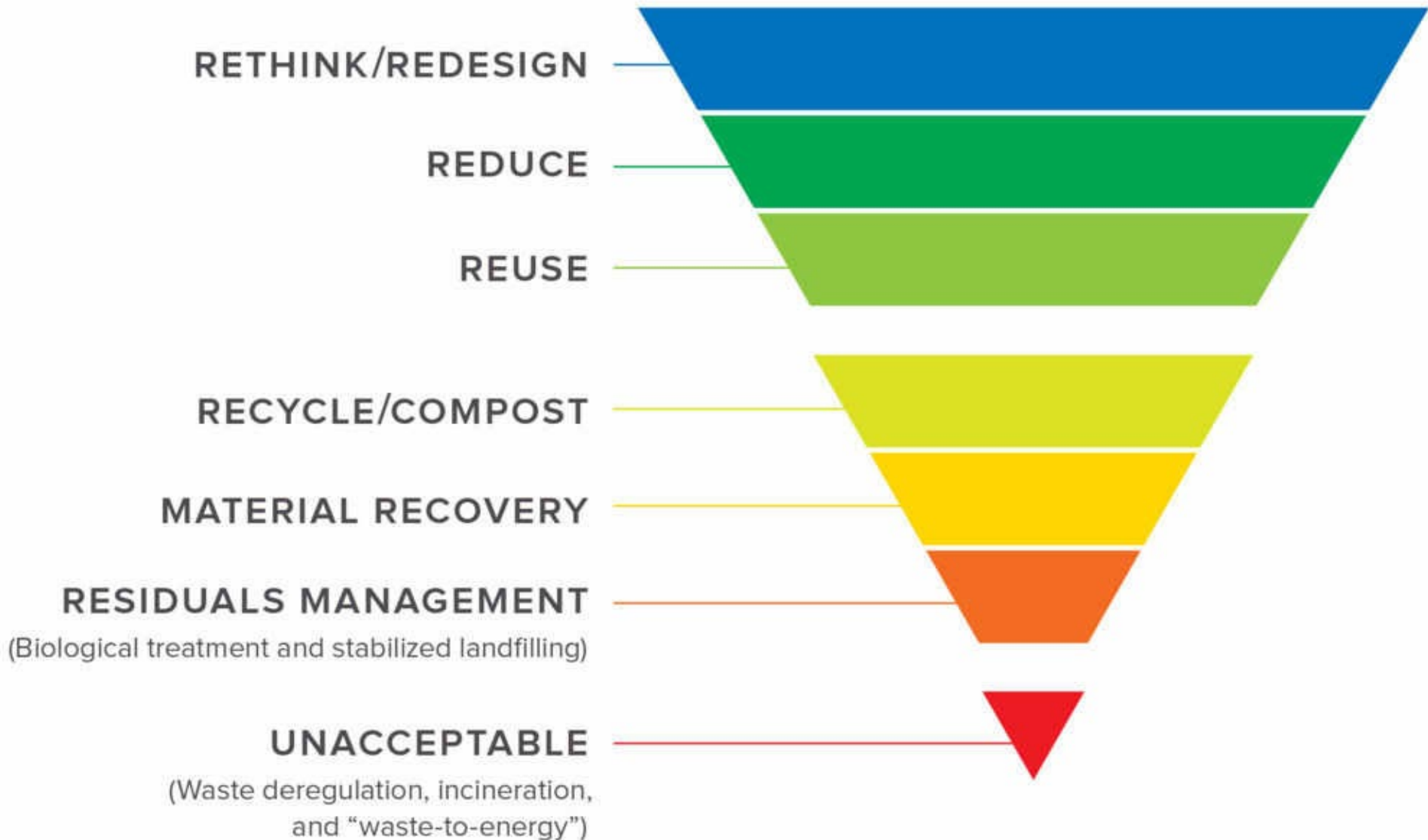
## Signers so far...

Mike Ewall, Esq.  
Executive Director, Energy Justice Network

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215 People's Alliance  
Beyond Plastics  
ECHO Systems  
McKean County Green Party  
Move Past Plastic  
Philly Thrive  
Physicians for Social Responsibility PA  
Save our Susquehanna  
Sierra Club Southeastern PA Group  
Toxic Prisons Campaign of the Human Rights Coalition  
Zero Waste Strategies LLC  
Zero Waste USA

# THE ZERO WASTE HIERARCHY





# Getting to Zero Waste

- Unit-based pricing – a.k.a. “Pay/Save as You Throw”
  - reduces waste by 44% on average right away; most cost-effective strategy\*
- Curbside composting collection
- Provide right-sized bins
- Deconstruction



Deconstruction Crew, [Second Chance](#), Baltimore, MD.

Photo Credit: C. Seldman



San Francisco's bin system:  
64-gal blue recycling bin  
32-gal green compost bin  
16-gal black trash bin

\* For good resources on unit-based pricing, see resources cited on pages 16-17 in the [Beyond Incineration report](#). On deconstruction, see [Reclamation Administration](#).

# What can we do?

- Let Delaware County Council know...
  - Dial back use of the incinerator to zero as rapidly as possible
  - Push DCSWA to **save Rolling Hills Landfill space** for unburned Delco waste; stop taking incinerator ash and non-Delco waste!
  - Fund the Delco Solid Waste Authority and municipalities to implement the [Delco Zero Waste Plan](#)
- Support Delco municipalities to implement pieces of the Zero Waste Plan
- Support our work to stop Philadelphia's use of incineration
- Get us invited to educate others on the health and environmental harms of ongoing use of incineration

**Learn more here...**

**[www.PhilllyZeroWaste.org/ContractFAQ.pdf](http://www.PhilllyZeroWaste.org/ContractFAQ.pdf)**

**[www.PhilllyZeroWaste.org](http://www.PhilllyZeroWaste.org)**

**[www.DelcoEJ.org](http://www.DelcoEJ.org)**

**[www.EnergyJustice.net/incineration](http://www.EnergyJustice.net/incineration)**



**Delco Environmental  
Justice**

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