Written Public Comment to the Pennsylvania Citizens Advisory Council

For the meeting of November 10, 2026

Submitted by Erin Jia, Memorial High School, Houston, Texas

To: Ian Irvin, Executive Director, and the members of the Citizens Advisory Council

The request in one sentence

I ask the Council to recommend that the Department of Environmental Protection record and publish the **county of origin** for out-of-state municipal waste, using the same field it already requires for waste that originates inside Pennsylvania, so that the Commonwealth can see clearly where the waste it receives actually comes from.

Why this matters now

Pennsylvania has long been the largest importer of municipal waste in the United States, and it is also the only major receiving state whose records make interstate accounting possible at all. Every quarter, under 25 Pa. Code Section 273.312, each landfill and resource recovery facility reports the weight of waste it received and where it came from, and the Department publishes the result. That is a genuine public good, and it is the reason the rest of this comment is possible.

But the ledger is built with one asymmetry. Section 273.312(b)(2) requires the operator to report "the county in which the solid waste originated or, if the waste originated outside this Commonwealth, the state." For Pennsylvania waste, the Department knows the county. For waste from every other state, the record stops at the state line. So the Department can say that 3,215,761 tons arrived from New Jersey in 2023 across all waste types, and cannot say from where in New Jersey a single ton of it came. In 2024, by my compilation of the Department's own published reports, 7.54 million tons arrived from outside the Commonwealth across all waste types, of which 4.59 million tons was municipal waste. The finest-grained waste ledger in the country goes blind at the state line, precisely where the largest flows cross it.

This has become timely for two reasons that sit outside Pennsylvania's control but bear directly on it.

First, Pennsylvania's own Environmental Justice Policy took effect on January 3, 2026, and PennEnviroScreen counts municipal waste sites among its pollution-burden indicators. Unlike New Jersey's statute, Pennsylvania's policy confers no authority to deny a permit. What it confers is enhanced public participation. When informed public voice is the remedy, the information that feeds that voice has to be complete, and on the single largest burden that host communities carry, imported waste, it currently is not. A Chester resident consulting the Commonwealth's own data can learn how many tons arrived at the Reworld Delaware Valley facility from New Jersey. They cannot learn whether it came from an overburdened New Jersey community or an affluent one.

Second, and this is the New Jersey connection the Council should weigh, New Jersey's environmental justice law, S232, was upheld on appeal and its rules are now in effect and enforceable in 2026. That law empowers New Jersey to deny or condition permits for new and expanding facilities in its own overburdened communities. It has raised a recognized and still-open question, in both academic commentary and the ongoing litigation, of what such a law means for its neighbors: whether a permit-denial regime in one state displaces burden outward toward states that have no equivalent authority. Legal analysis of the New Jersey rules notes that the law "may also prompt applicants to seek new permits for new facilities in areas not considered overburdened communities." Pennsylvania is the neighbor most exposed to that dynamic, and it is already the destination for millions of tons of New Jersey waste each year.

Here is the difficulty. Pennsylvania cannot presently evaluate that question with its own data, because its ledger records only "New Jersey," not the New Jersey county. If burden is shifting across the Delaware, the Commonwealth would not be able to see it, measure it, or distinguish it from ordinary commercial flows. County of origin is exactly the field that would let Pennsylvania, and its environmental justice screening, test the question rather than argue it in the dark.

The finer data exists and is feasible

This is not a request for information that no one collects. New Jersey requires its own transporters to compile, monthly, the county where exported waste originated. I know the detail exists because I obtained it: working from New Jersey's facility-level origin and disposal records, about 524,000 records covering January 2021 through mid-2026, I reconstructed where New Jersey's waste actually goes, county by county. Those records show flows running in both directions across the state line. New Jersey's Camden incinerator alone imported roughly 810,000 tons from Pennsylvania over that period, and the Gloucester County landfill took in about 551,000 tons of out-of-state ash from Pennsylvania and New York plus roughly 773,000 tons of out-of-state construction, demolition and bulky waste. Each state holds exactly the half of the picture the other is missing. New Jersey compiles the sending county and does not publish it. Pennsylvania publishes its ledger and does not record the sending county. Pennsylvania's half is the smaller ask.

What I am asking the Council to recommend, all within the Department's authority

I have framed each of these so that it can be pursued through the Department's own administrative and regulatory process, without new legislation from the General Assembly, which is why I am bringing them to this Council.

1. **Add one field to the quarterly operation report: county of origin for out-of-state municipal waste.** Because Section 273.312 requires reports "on forms supplied by the Department," the Department can invite this finer field on the existing form in the near term, with the first year voluntary to surface any real compliance burden, and can make it durable through an amendment to Chapter 273. Both paths run through the Department's own process rather than the General Assembly. The information is already in hand at the source: haulers know the origin of what they carry because their billing depends on it, and New Jersey's transporters already compile it monthly.

2. **Publish the disposal-and-origin series as a downloadable, machine-readable dataset.** The Solid Waste Disposal Information dashboard is valuable, but it is not yet a published dataset. Indiana has published a comparable waste series as spreadsheets for thirty-four years, so this is a choice a state can make.

3. **Document, in one paragraph, what "county of origin" means for waste that passed through a transfer station,** so that users of the published data know whether origin is attributed to where waste was generated or where it was consolidated.

None of this asks Pennsylvania to accept less waste, charge more for it, or apologize for hosting an industry its neighbors depend on. It asks the Commonwealth to finish the ledger it alone had the discipline to keep, at the exact moment its neighbor's new law makes the origin of that waste a question Pennsylvania has a direct stake in answering.

The dataset behind this comment, aligned extracts of Pennsylvania, Ohio, Virginia and New Jersey records, is free to the Council or the Department on request. Thank you for placing me on the commenter list, and for the Council's attention.

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