



**SIERRA
CLUB**

Prince George's County, Maryland

July 20, 2020

Hon. Todd Turner, Chair
Members of the County Council
17471 Governor Oden Bowie Drive
Upper Marlboro, MD 20772

Dear Chairman Turner and members of the County Council,

RE: Sierra Club Comments on the 10-Year Solid Waste Management Plan, 2020-2029 (CR-50-2020)

Thank you for the opportunity to review the draft updated 10-Year Solid Waste Management Plan for 2020-2029. We are glad to see a number of features in the plan that we support:

- Maintaining once/week trash collection, which reduces trash, incentivizes recycling, and reduces greenhouse gas emissions
- The introduction of an optical sorter for the MRF, to sort plastics by resin
- Implementation of the County's product bans for items that cannot be recycled
- Rejection of mixed waste composting (a "dirty MRF"), an expensive and wasteful investment that would sort non-separated trash, organics and recyclables.

We also support extension of the life of the landfill by using all available space (developing Area C), but with two caveats. The landfill produces methane, a powerful greenhouse gas. While much of it is captured, there is leakage, and recent studies by scientists at the University of Maryland suggest that there may be more leakage than what current detection methods are indicating.¹ **We'd like to see independent testing using diverse measures to monitor methane leakage, and a plan to reduce it.**

Furthermore, organic material in the landfill is what largely generates the methane. Expansion of curbside food scrap composting and community composting across the county will reduce future methane emissions and further conserve space in the landfill, while paying for its costs. **We want to see this Plan amended to include a timetable for expansion of curbside food scrap collection for County residents.** The County owns the largest food waste composting site on the East Coast, yet its residents are not realizing its benefits.

We have assembled detailed comments on the document for the benefit of the Department of the Environment in an Appendix.

¹ Ren et al. 2018. "Methane Emissions from the Baltimore-Washington Area Based on Airborne Observation: Comparison to Emissions Inventories," *Journal of Geophysical Research: Atmospheres* 123:8869-8882

Finally, we strongly encourage the County Council to adopt a Zero Waste Plan in 2021, with goals and a costed, prioritized, timeline to achieve them. This was the principal recommendation of the "Zero Waste Initiatives for Prince George's County" report issued in 2018, and has yet to be addressed. It would also contribute to achievement of the County's Climate Change Action Plan.

Sincerely,



Martha Ainsworth, Chair
Prince George's Sierra Club Zero Waste Team

Appendix: Micro-comments and Corrections

Cc: Mr. Joe Gill, Department of the Environment

Ms. Marilyn Naumann, Resource Recovery Division, Department of the Environment

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Furthermore, organic material in the landfill is what largely generates the methane. Expansion of outside food scrap composting and community composting across the county will reduce future methane emissions and further conserve space in the landfill, while paying for its costs. We want to see this plan amended to include a timeline for expansion of outside food scrap collection for County residents. The County owns the largest food waste composting site on the East Coast, yet its residents are not realizing its benefits.

We have assembled detailed comments on the document for the benefit of the Department of the Environment in an Appendix.

Ben et al. 2018. "Methane Emissions from the Baltimore-Washington Area Based on Airborne Observations: Comparison to Emissions Inventories," *Journal of Geophysical Research: Atmospheres* 123: 8889-8892

Micro-comments and corrections²

Introduction

p. 1, second paragraph under Plan Summary

- Correct this sentence: “Council Bill 5-2015 banned the sale and use of expanded polystyrene, commonly known as “Styrofoam,” food containers by in food service businesses and the retail sale of these containers; it took effect on January July 1, 2016.” (The public information part of the bill took effect January 1, 2020; the ban took effect on July 1, 2016.)
- Add the following sentence at the end of the paragraph: “Council Bill 52-2019 bans single-use straws and stirrers that are not home-compostable; it went into effect on July 1, 2020.”

p. 1, third paragraph under Plan Summary: “Every year, it processes about 70,000 tons of organic materials and projects more when the County expands its residential food scrap collection program.” When will the County be expanding residential food scrap collection?

p. 2, second paragraph, Solid Waste Generation: The information on is from national statistics. *Why isn't this plan using statistics from Prince George's County, including from the 2014-2015 Waste Characterization Study?*

p. 3, top of page under Recycling: “[Food scrap waste diversion] has been ongoing for several years with the piloting of 200 homes, and will be expanded countywide.” When will it be expanded countywide? When will it be expanded to the 3,000 households that were programmed for 2020?

Chapter I

I-7, second paragraph, sentence beginning with “The Department’s Resource Recovery Division is responsible for...., including product bans such as the bans on expanded polystyrene food containers and single-use straws that are not home-compostable, within the Prince George’s County.”

I-17, Solid Waste Studies and Initiatives. (a) When will a repeat waste characterization study be done? *CB-87-2012 advocated that a waste characterization study be conducted every two years.* (b) Why is the Resource Recovery Master Plan still in draft? On p. I-18, A public meeting was held in January 2019 to elicit comments. Why is it still in draft, 18 months later?

I-17, Zero Waste Plan. **Prince George’s County does not have a Zero Waste Plan.** “Zero Waste Initiatives for Prince George’s County, Maryland” (SCS Engineers, April 2018) describes a menu of program options for reducing waste. It is not a Zero Waste Plan with goals, a timeline, an implementation plan, or a budget to achieve it (as described in the last paragraph of p. I-17). The report recommended adoption of a Zero Waste Plan by the County Council (see the bottom of p. 27 of the Initiatives study). Three corrections to the text:

- First paragraph, p. I-17: Replace “Zero Waste Plan” with “a study of Zero Waste Initiatives for Prince George’s County (2018)”
- Heading B, before the fourth paragraph: Replace “Zero Waste Plan” with “Zero Waste Initiatives”.

² Martha Ainsworth, David Brosch, Lily Fountain, Janet Gingold, Joseph Jakuta, and Bill Walmsley, contributed to these comments

- Last paragraph, p. I-17: Replace the existing lead sentence with: “Overall, the report recommended that the County adopt a detailed, time-bound, cost-effective, measurable, participatory and innovative Zero Waste Plan.”

Chapter II

II-9 to II-11: Section III: Zoning Requirements. (a) It appears that Tables 2-4 and 2-5 reflect the Zoning Ordinance as of 2018, but it has been revised recently. Will these tables be updated to reflect the new Zoning Ordinance? (b) Tables 2-4 and 2-5 don't seem to track Composting Facilities. The updated Zoning Ordinance has a new use category for “Community (in-vessel) Composting” that is allowed in many zones.

Chapter III

III-6, D-1 Bulky Items – “Reuse Centers have been posted on the Resource Recovery Division’s internet homepage...” We couldn’t find a link to Reuse Centers on the RRD’s home page.

III-7, Food Waste – “During this planning period, the County will...assist in expanding the County’s residential curbside collection of food scraps to an additional 3,000 households during Fiscal Year 2020, with incremental expansions thereafter...” **It’s our understanding that this has not been done. When is the target date for expansion of curbside composting to 3,000 households and the rest of the county in this updated TYSWMP?**

III-16, Table 3-3, BSRSL Tonnage Received –What accounts for the drop in solid waste tonnage in CY2017? Are data for CY2019 available?

III-40, IV, M Unauthorized Dumping - How successful have the three control measures been, in terms of the number of citations issued, fines collected, etc.?

III-41, IV, Special Waste – “Information regarding special waste collected in Prince George’s County is not substantial, either because data is not available or the volume of such waste is very small.” What can be done to get better data? A small volume can still constitute a big problem.

III-69, List of MNCPPC Facilities – The list is missing Marietta House in Glenn Dale.

Chapter IV

IV-12 –Brown Station Road Sanitary Landfill - Have any of the water monitoring samples exceeded the limits?

IV-21, end of first paragraph: Multiple corrections:

- “Additionally, a ~~County resolution~~ Council Bill 5-2015 ~~passed banning~~ banned the sale and use of expanded polystyrene food and beverage containers.”
- “In 2019, ~~the rollout for the implementation of~~ CB-12-2018 took effect, ~~will commence which~~ requiring commercial establishments to provide recycling bins along with trash bins.”
- Add: “As of July 1, 2020, a ban on single-use straws that are not home-compostable went into effect.”

IV-23, Once per Week Residential Trash Collection. Are there any data available to assess whether once/week trash collection in the County has resulted in less waste and more recycling?

IV-24, first paragraph:

- The paragraph compares increases in the participation rate and the amount of residential materials collected and recycled from November 2010. (a) *What is the end date?* (b) While it is plausible that some of the increase could be due to changes in the allowable containers for curbside collection, the increase can also be due to the economic recovery that occurred over that period and/or (for the increase in amount collected) to population growth.
- While plastic bags and film have been banned, it is still the case that 3 workers spend 8 hours each at the end of every shift at the MRF removing plastic film from the screens, which is costing at least \$125,000 in extra costs. *Can the county crack down on the haulers who are accepting film, monitor whether they are refusing to collect recyclables when they are provided in plastic bags?*

IV-24. In the first complete paragraph, (a) do we know what the local processors do with portions of 1-7 mixed bales that are not recoverable? How can we know that they are not being shipped overseas to developing countries? (b) How can more glass be recovered and glass contamination reduced? (c) The recycling rate should be computed based on what is actually baled, sold, and recycled, not the amount coming in from the MRF.

IV-24, last line & top of IV-25: "...in 2018 Composting food scraps will further reduce waste sent to BSRSL..." *When will curbside collection of food scraps be expanded County-wide?*

IV 26-27, discussion of the use of landfill methane emissions for other purposes. How is methane leakage being monitored? How much is being captured, and is there some way of verifying leakage through multiple types of measurement? Scientists from the University of Maryland have detected high levels of atmospheric methane collect by aircraft over the Brown Station Road Sanitary landfill – higher than might be indicated than by measurements on the ground.³

IV-27, VIII Public Involvement Program - The Solid Waste Resource Management and Recycling Advisory Commission has not met in well over a year and for all intents and purposes is nonfunctioning. What can be done to resuscitate it?

IV-33, IX. Feasibility of Solid Waste Composting. We're very glad that this "dirty MRF" option has been rejected. It is very expensive and results in high contamination and low recovery of materials. Compostable materials should be source-separated from trash and recycling.

Chapter V

Missing from the Action Plan: (a) A commitment and timetable for extending curbside collection of food scrap composting County-wide. (b) Planned actions on business recycling and a rollout of the straw ban. (c) A commitment to build the additional convenience center in North County, previewed in previous CIPs. (d) The cost of the proposed action plan. (e) Specifics as to actionable items/objectives/goals, who is responsible, a timeframe for accomplishment, and how to gauge results. That is, what is needed to implement the plan.

³ See Ren et al. 2018. "Methane Emissions from the Baltimore-Washington Area Based on Airborne Observation: Comparison to Emissions Inventories," *Journal of Geophysical Research: Atmospheres* 123:8869-8882, and Wang et al. 2013. "Using Observed Data to Improve Estimated Methane Collection from Select US Landfills," *Environmental Science and Technology* 47:3251-3257.

In addition, waste collection vehicles are often very polluting and traverse our communities. In particular they produce high levels of fine Particulate Matter, which is linked to premature mortality and poor lung function. An incentive structure should be devised so that contractors use the cleanest fleet available with the goal towards switch to zero emission vehicles.

V-1, Introduction, last sentence. The County should achieve a “reducing, recycling, and composting-oriented society”. (not just recycling)

V-1, Waste Collection. We applaud the commitment to remain at once/week trash collection, and advocate that once/week curbside food scrap collection be added.

V-1, Brown Station Road Sanitary Landfill. In-filling Area C is a cost-effective solution in the short run, but we request that this be conditioned on a commitment to substantially expanded food-scrap collection countywide (to reduce future methane emissions) and to a closer review and independent measurement of the extent of methane leakage at the landfill, with recommendations on how to further reduce it. This is entirely consistent with the recently approval of a committee to come up with a Climate Change Action Plan.

V-2, Materials Recycling Facility. The purchase of an optical sorter makes sense to sort out and sell bales of specific plastics, which can be sold at a higher price. The MRF should also have to publish the rejection rate for the plastics previously in mixed bales for which there is no market. Will those residuals go to the landfill?

V-5: The CIP discussion doesn't include the North County convenience center or improvements in the convenience center on Brown Station Road, nor does it explain in what years these projects will be financed, and how much they cost. The hazardous and e-waste programs would benefit from more dropoff locations. Satellite locations should be developed to allow residents to drop these materials off, hazardous waste in particular, without the need to visit the Landfill.

V-6, Stakeholder Engagement . This section says nothing about how to get residents and businesses to dispose of things properly . We reiterate our previous comments about importance of web resources that tell people how where and when to put things for optimal reuse and recycling

Appendices

Appendix C: Reuse and Recycling

The county could do a lot more to support the repair and reuse of much of what ends up as bulk trash. So much more could be done to keep it out of the landfill and direct it to an extended life in the hands of others particularly those having so little and needing so much. The Zero Waste Initiatives paper (pp. 28-29) advocated for a Resource Recovery Park with repair stations or repair café that would extend the life of broken materials.

Appendix D – Recycling Report

p. 2 – Single-Stream Recycling. Although plastic bags are banned, they are still arriving at the MRF and destroying the equipment. What is DOE proposing to reduce this problem?

p. 3, Multifamily Recycling. The first sentence is factually incorrect. Recycling by apartment dwellers is no mandatory. It is mandatory for the property owner to provide the opportunity to recycle, as noted in

the second sentence. The same incorrect statement is made in the third paragraph about inspections performed to enforce the “mandatory recycling requirements.”

p. 3, Commercial and Industrial Recycling. Again, in line 4 of the paragraph it is asserted that commercial recycling is mandatory, while what is mandatory is providing the opportunity to recycle (as noted at the beginning of the same sentence).

p. 4 Convenience Centers. Why aren't these North County and BSR convenience centers mentioned in Chapter V?

Appendix E –Public School Recycling Program

Given the high percentage of paper collected at County schools and the concern about contamination of recyclables, why isn't the paper source separated from (for example) beverage containers and other recyclables, and baled separately?

According to some of our members, the Green Schools program has not been not very effective at increasing recycling. The schools are overwhelmed by everything else and trying to manage a recycling program is not on their agenda. Also only about 50% of schools are Green Schools leaving recycling likely to not be occurring in almost half of our educational facilities. The same staff that are required to deal with regular waste need to be responsible for recycling.