

**Attachment A**  
DoE Response to Sierra Club and WSSC Comments

## **Sierra Club**

### **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 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.”

We concur with these changes.

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?*

See body of letter.

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?*

We used national statistics as baseline data and compare with county figures for management purposes.

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?*

See body of letter.

### **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 Prince George’s County.”

We concur with these changes.

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?

The next waste characterization study is programmed for FY2022. On the Resource Recovery Master Plan (RRMP), DoE is implementing selected elements of the Plan as funding and resources allow. Other elements of the plan have been overtaken by events, e.g., the dramatic downturn in the recycling market. DoE will update the RRMP by the end of the CY 2020. The RRMP will integrate elements of the “Zero Waste Initiatives for Prince George’s County, Maryland (SCS Engineers, April 2018) as appropriate.

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”.
- 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.”

We concur with these changes.

## 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.

We concur with this recommendation.

## 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.

We will re-upload the link

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?**

See body of letter.

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

The drop in solid waste tonnage in CY2017 could be attributed to the reduction in commercial trash going to the landfill. The County cannot regulate the flow of commercial trash. On the other hand, Residents were recycling more and generating less trash.

Data for CY2019 is available but it was not added because of the cut-off date since MDE made a preliminary approval of the document in 2019. It will be included in the next update.

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.?

DoE has installed cameras in problematic areas throughout the county and is working in concert the Police department with several cases in process in the court system. However, some setbacks are being experienced due to the pandemic such as delayed issuance of citations and resolutions as a result of the closure of the court system.

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.

We concur and recommend removal of the 2<sup>nd</sup> and 3<sup>rd</sup> sentences.

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

We concur and can add Marietta House.

#### **Chapter IV**

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

Based on the October 2019 Groundwater and Surface Monitoring Plan, none of the water samples exceeded outside of the threshold limits.

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

- “Additionally, Council Bill banned the sale and use of expanded polystyrene food and beverage containers.”
- “In 2019, CB-12-2018 took effect, 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.”

We concur with these changes.

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?

When the once a week trash collection was rolled out, it resulted in an increase in residential recycling. Data for FY2016 showed a 6% increase in recycling materials brought to the MRF compared with FY2015.

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?*

Referenced data sets were collected between 2010 and 2018, and monitoring is ongoing. Plastic film is still causing a problem at the MRF. While we allow no plastic bags in the single stream recycling program, plastic is still making way through the MRF. The County is actively working with both residents and haulers to stop plastic bags from being put into the recycling collection program. The county will soon be conducting direct mail to the residents concerning this matter and we are performing more frequent spot checks of incoming loads at the MRF.

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.

- (a) Referenced mixed bales are sold nationally to processors, who then further sort the product into specific plastic grades, and market to end-users. The plastic stays in North America. Our planned optical sorter will allow us to sell refined bales (less than 2-5% contamination, which is variable by season) directly to the end-user and at a higher value.
- (b) Glass markets for mixed glass products (single stream) are at their lowest. Until markets recover, it will be difficult to recover more glass. We have alternate uses onsite at our Landfill which saves expenses for aggregates.
- (c) MDE requires calculations based on incoming material, outgoing materials, and residue.

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?*

See body of letter.

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.<sup>1</sup>

In accordance with Federal and State regulations and per New Source Performance Standards, the landfill is tested quarterly for fugitive gases by way of a circuitous walking route with a gas sensing probe and monitor. If we detect and exceedance, we correct and resample within five (5) days. We have no violations.

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?

This Commission will be re-appointed.

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.

See body of letter. The draft Plan meets the regulatory requirements.

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)

We concur and can make this change.

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<sup>1</sup> 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.

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 recent 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?

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 drop-off 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.

Note. The County's FY '21 – 25 CIP, recently adopted, schedules these improvements.

V-6, Stakeholder Engagement. This section says nothing about how to get residents and businesses to dispose of thing 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

Agree. RRD recently hired a new Planner to conduct work on its website and perform education and outreach. This work is in progress.

## **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.

A Reuse Center is being considered in conjunction with Area C and redesign of the Brown Station Road Convenience Center.

### **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?

Plastic bags are still making to the MRF. County is actively working with haulers and will be sending direct mail to residents very soon. More frequent check of incoming loads including rejecting highly contaminated loads and issuing fines to haulers. DoE is actively working in the largest collection area that has the most “contamination” within recycling. DoE’s Recycling Section (RS) has held numerous events, engaged many people at their places of shopping, distributed materials in Spanish and English, and replaced old recycling carts with new carts that have a yellow lid to help distinguish recycling (by the bright yellow lid). This work is ongoing and when this area is completed, the RS will then work in the next identified area. The Recycling Section also updated the MRF virtual tour, which has been posted on the DoE RRD website to help teach residents what to and not to recycle.

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.”

We concur with these changes.

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).

We concur with these changes.

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

Chapter V is a planning chapter. BSR convenience center is an active facility while the North County convenience center is at a conceptual stage.

#### **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?

Some schools collect paper separately and do not necessarily deliver it to the County’s MRF.

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.

The Green Schools Program is a State program and is directed by the Schmidt Outdoor Recreation Center. Green schools are not certified by the County and recycling is just one of the requirements to be certified as one. The Maryland Association of Environmental Outdoor Education oversees the registration of the green schools. PGCPs participates in the County’s single-stream recycling program. A hauler collects the recycling materials from public schools and are delivered to the County’s MRF.

## WSSC

1. General – Any reference to WSSC Wastewater Treatment Plants should be WRRFs (Water Resource Reclamation Facility).

We concur with these changes.

2. Page 60 of the pdf, Section III-13. The plan mentions two biosolid incinerators at Western Branch WRRF as if they are still in service. The incinerator(s) are no longer in service and there are no plans to put them back in service.

Noted. We concur with these changes and can modify.

3. Page 65 of the pdf, Section III-18. The last sentence states “Final treatment is accomplished at the WSSC Western Branch Wastewater Treatment Plant.” This should be re-written to state “The pre-treated leachate is discharged to WSSC’s wastewater collection system and conveyed to the Western Branch WRRF.”

Noted. We concur with these changes and can modify.