

| COMMENT | | | | | | RESPONSE | | | |
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| No. | PRIMARY IMPACTED SECTION | OTHER IMPACTED SECTIONS | TOPIC | NAME | DATE RECEIVED | | CHANGE PHASE 1 REPORT | CONSIDER FOR PHASE 2 | RESOLUTION |
| 1 | ES | 8.3, maybe other places | "Not recommended" | Gallagher, Patrice | 16-Jun-2016 | "Not recommended for further consideration" add "in the Phase 2 study" to this subhead. | | | |
| 2 | ES | | "Not recommended" | LeBlanc, Phil | 25-Jun-2016 | <p>[W]hat do you do with the "not for GEOSYNTEC further study" items?</p> <p>Is the paragraph title "Not recommended for further consideration:" on page 3 of the Executive summary misleading? Should it have been "Not recommended for inclusion in Phase II detailed study" or something that follows the idea that other processes will take up this ideas?</p> <p>What should be done with the NOT recommended or Eliminated for further study. I would suggest that this options be review for further action as appropriate. I particular I suggest that SWSC, SWAC, Municipalities, and the County's SWM review, etc. take action as appropriate. At a minimum the county should define what efforts if any will be taken toward this ideas.</p> | Yes | No | The Steering Committee agrees that the heading is misleading since these options may be considered by the county or municipalities. The heading will be retitled "Not recommended for consideration in Phase 2 Analysis" and used that way throughout the document. |
| 3 | ES | | Composting | LeBlanc, Phil | 25-Jun-2016 | <p>It looks like most of the future study will involve "COMPOSTING" or related activity (4 of the 6)</p> <p>Very little on other areas of incremental improvement (example; Improving recycling rates in Municipalities). No accumulation of impact of "many small actions/options" that should add up to "doing the right thing".</p> <p>It seems a little of the "Northeast Maryland Waste Disposal Authority (NMWDA)" approach (a bigger Reginal view) verses what a smaller local government entity should promote with it citizens.</p> | Yes | Yes | The options selected for further analysis are those that best divert waste from disposal, minimize environmental impact, and incur the least cost. This does not and should not preclude the County from exploring other options in the future. |
| 4 | ES | | Option(s) | LeBlanc, Phil | 25-Jun-2016 | Executive Summary, Next Step – Phase 2, page 5 , last part of first sentence read "and in combination with <u>all</u> other options" so as the have a complete overall recommendation. | Yes | No | The sentence will be clarified to read "and in combination with all other appropriate options" since not all combinations may make sense. |
| 5 | 1.4 | | Geosyntec credentials and background | Poklemba, Veronica | 12-Jun-2016 | Background of Consultant – Geosyntec Geosyntec acknowledges that their main activities in MD have involved landfills, Material Recovery Facilities and transfer stations (classified as "hard" options in this Study). I believe their background has influenced the outcome of this study. For Phase 2 Frederick County needs the assistance of consultants with experience with the "soft" options identified in the Study. Soft options are defined as programs, activities or incentives that change the ways components of the waste stream are collected from county households or businesses (p. 61). Consultants with experience in "soft" options would be better able to explore the areas I identify above, as well as other "soft" options such as pay as you throw (PAYT). | Yes | No | The Steering Committee believes the work of Geosyntec to be technically excellent and free of bias, but acknowledges that the Report itself should have provided background and experience of its authors. There is no need to change consultants. The Steering Committee will ask Geosyntec to write a new section (1.4) under the introduction, explaining the background of Geosyntec, its subcontractors, and experience with hard options, soft options and waste minimization. |
| 6 | 4.3.1 | | Composting | Sierra Club (Dan Andrews) | 27-Jun-2016 | For clarity, add to title: "Aerobic" Composting Food Scraps and Other Organics.Perhaps add a bullet which mentions the benefits of reducing GHG's in landfills, by composting. Under "Odors": mention that these can be reduced by use of wood chip filters and reverse vacuum conduits beneath the piles/rows. | Yes | Yes | The title will be changed to "Aerobic Composting of Food Scraps and Other Organics." We will ask Geosyntec to consider your comments in Phase 2. |
| 7 | 4.3.4 | 6.3.6 | RRPs | Sierra Club (Dan Andrews) | 27-Jun-2016 | Clean Resource Recovery Parks (RRP's) need to be explained in detail in this section. Since a resource recovery park was a very important citizen recommendation, this section needs to be written very clearly. | Yes | No | We agree that this section and 6.3.6 need to be rewritten for clarity. See the response to section 6.3.6 for details. |
| 8 | 4.3.4 | | RRPs | Sierra Club (Dan Andrews) | 27-Jun-2016 | Also, under "Contamination" list the percentages of contamination. | | | |
| 9 | 5.4.1 | | Criteria | Sierra Club (Dan Andrews) | 27-Jun-2016 | under "Waste Minimization" : Add to the list, decreasing the amount of waste generated in the first place. You missed this point. | Yes | No | Reference to 'source reduction' will be added. |

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| 10 | 6.1.1 | 6.3.6 | RRPs | Sierra Club (Dan Andrews) | 27-Jun-2016 | The very last sentence on page 61 states "mixed waste processing is made more efficient by removing food waste from the incoming feedstock" – but you don't address if a MWPF exists, it offers a dis-incentive to recycle and compost for many people! This doesn't really make good sense. | Yes | No | Phase 2 will evaluate a Resource Recovery Park (RRP) as one option. See comment on section 6.3.6 for a discussion of the clarifications that will be made concerning RRPs and related terms. |
| 11 | 6.2.2 | | Food Waste Collection | Rudy, George, PE | 3-Jun-2016 | The stated "food waste collection" scope should be expanded to explicitly include the following special events venues: a) commercial special events venues such as, Ceresville Mansion, Walkersville Overlook, Shade Trees and Evergreens, and the like. b) community special events venues such as Community Carnivals; the Great Frederick Fair; City of Frederick Baker Park, "On the Street," and "On the Canal" events; and the like. | Yes | Yes | The text while be modified to read, "The focus is on restaurants, food producers, grocery stores, schools, special event venues, and other institutions." We will ask Geosyntec to consider events in Phase 2. |
| 12 | 6.2.2 | | Food Waste Collection | Rudy, George, PE | 25-Jun-2016 | Restaurant trash and food stuffs are placed in single dumpster which is transferred to the County waste system. Hence, the waste process can be improved with trash reduction by <i>requiring</i> [emphasis added] the shopping center to have specific dumpsters designated for trash and food stuffs | Yes | Yes | Food waste collection from restaurants will be evaluated further in Phase 2. As part of this evaluation best practices in food waste collection will be a component of the evaluation. |
| 13 | 6.3.6 | ES, 4.3.4, 8.4 | RRPs - terminology | Sierra Club (Dan Andrews) | 27-Jun-2016 | This is not what the citizenry asked for at the public forums. First paragraph: "increasing source separation and recovery... have not been implemented" is not in keeping with being "fully cognizant of zero waste principles and goals" as you stated previously on pg. 51. | | | |
| 14 | 6.3.6 | ES, 4.3.4, 8.4 | RRPs - terminology | Zero Waste Alliance petition | 23-Jun-2016 | ... the concept of an RRP appears to be equated with a Mixed Waste Processing Facility (MWPF). If this language is not clarified it does not reflect the intent of the citizen input at the forums. A MWPF, which is also known as a "dirty MRF," is a very expensive technology which can damage our efforts to promote source separation of recyclables and food waste. Spending time, effort, and money on a detailed analysis of a dirty MRF would be a distraction from the main components of the recommendations for Phase II study. Please remove consideration of a MWPF from the Phase II study ... Consideration and study of a clean RRP should be performed in lieu of the MWPF. | | | |
| 15 | 6.3.6 | ES, 4.3.4, 8.4 | RRPs - terminology | Sierra Club (Dan Andrews) | 27-Jun-2016 | Section 6.3.6 needs to be replaced by an analysis of a "clean resource recovery park"! We should not build a facility that accommodates mixed waste – in a single mixed bin collection. This is a move in the wrong direction! It dis-incentivizes the proposed three bin system and doesn't make good sense. | | | |
| 16 | 6.3.6 | ES, 4.3.4, 8.4 | RRPs - terminology | Poklemba, Veronica | 12-Jun-2016 | Alternate definition provided at "What's Next" meeting by Fred. Zero Waste Alliance: Resource Recovery Park - the colocation of reuse, recycling, compost processing, manufacturing and retail businesses in a central facility. Such a facility could be a private business, a public/private partnership, or a County owned operation. A more common definition in the Zero Waste community. Other necessary definitions: Materials Recovery Facility (MRF) (Clean MRF) – processes recyclables that have previously been source separated. This is what happens to recyclables in Fred. Co. at this time. Something like this could be one component of a Resource Recovery Park in the alternate definition. Mixed Waste Processing Facility (MWPF) (Dirty MRF) – Takes all materials together in a single container which includes recyclables, organics, trash... This facility involves more costly technology as it is supposed to than separate all of these mixed materials and organics into recovered materials for recycling, organics and "residue" (what's left) which must be disposed of by traditional means (landfilling/incineration). | | | |

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| 22 | 6.3.6 | ES, 4.3.4, 8.4 | RRPs - terminology | No Incinerator / Frederick County Zero Waste Alliance petition | 25-Jun-2016 | <p>During the Phase I Citizens' Forums, the concept of a Resource Recovery Park (RRP) was raised and endorsed by citizens on numerous occasions, which is why it is included in the recommendations for more detailed study in Phase II.</p> <p>However, in the final Phase I report the concept of an RRP appears to be equated with a Mixed Waste Processing Facility (MWPF). If this language is not clarified it does not reflect the intent of the citizen input at the forums.</p> <p>A Mixed Waste Processing Facility, which is also sometimes called a "dirty MRF," is a very expensive technology that can undermine our efforts to promote source-separation of recyclables and food waste. Spending time, effort, and money on a detailed analysis of a dirty MRF would be a distraction from the main components of the recommendations for Phase II study.</p> <p>Frederick county has an interim goal of reducing its waste stream going to landfills by 40,000 tons by 2025. The Phase I report points out how this goal may be achieved through increased recycling and the removal of food waste from the waste stream. The Phase II study should focus on the details of how to implement those plans.</p> | | | |
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| 23 | 6.2.1 | | School recycling | Norris, Linda | 15-Jun-2016 | I applaud the recovery of food scraps from schools, but I believe there may be low-hanging fruit and leveraging of existing programs that was referred to in the report. From my experience, having had students in the schools the past 18 years, (I don't know if waste audits in FCPS have been done) there is additional recyclable material to be recovered from the schools. Uneven application of recycling contracts from school to school is the cause. Also, our USCC members have found that the amount of food recoverable from schools is often overestimated. | No | Yes | Recycling and organics recovery in schools will be evaluated in more detail in Phase 2. |
| 24 | 6.2.1 | | Waste Reduction Programs at Schools | Rudy, George, PE | 3-Jun-2016 | Waste reduction program at county schools all private and public schools within the County – This would include collecting food waste for composting, and increasing recycling efforts. (soft). GCR Recommendation: For clarity and completeness, it is recommended that the scope be stated explicitly to include child care centers, K to grade 12, and colleges such as Frederick Community College, Hood College, STEM University, and the like. | No | Yes | Phase 2 will address school recycling in detail and will define a scope at that time. |
| 25 | 6.2.5 | | 3-Bin Program | Rudy, George, PE | 3-Jun-2016 | ... NIH has a waste management program which includes at least three cardboard waste-specific bins located throughout each and every floor of its on-campus buildings. At the 24 May BSABB seminar at NIH, I was able to obtain a copy of the NIH Waste Disposal Guide [Ref. 2] for the benefit of the "What's Next" committee and Frederick County. With "special emphasis," it is noted that the NIH community replicates-in-kind the various waste sources and streams [that is, conventional, toxic, biological and radiological] that exist within Frederick County. ... In addition to the traditionally perceived household three-bin system, it is recommended that the hallway multi-bin system [as implemented throughout the NIH Campus [Ref. 2]] be implemented for all County schools, County and commercial office buildings, adult care centers, medical centers - FMH, and Government and commercial industrial complexes, such as the Ft. Detrick Campus and the like. | No | Yes | Phase 2 analysis will further evaluate the appropriate collection structure for the County. |
| 26 | 6.2.5 | | 3-Bin Program | Orr, Lisa | 2-Jun-2016 | [Will] the food waste collection program being recommended for restaurants ... include collection of paper towels from restaurant rest rooms. Paper towels are not recyclable – the fibers are too short, hence then can only be disposed as waste or composted. | No | Yes | Phase 2 analysis will further evaluate the appropriate collection structure for the County. |

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| 27 | 6.2.5 | | 3-Bin Program | Pokiemba, Ver | 12-Jun | Examine variations of creating a 3 bin collection system, which the Study indicates achieves MRA recycling goals as a stand-alone choice (per Study reaches 100% of the recycling target and three times the food waste target). An assumption was made in the study that all of the current systems in place would change. I suggest looking at different options such as maintaining current trash and recycling systems but add pick up of organics with community scale composting pilot or large scale composting. It seems costs would be less for implementation of one change in the system. Other options should be considered. Perhaps privatization for compost pick up and management (ex. Veterans composting, offers full service pick up of organics and composting at their facility; which offers consultation services). | No | Yes | We agree with the suggestion and note that a three bin program (trash, recycles, and organics) is recommended for further analysis. |
| 28 | 6.2.5 | | Paper bin | Bartelt, Jeannette | 20-Jun-2016 | I'd like to see at least paper being separated from the rest of the recycling. | No | Yes | Phase 2 analysis will further evaluate the appropriate materials and collection structure for the County. |
| 29 | 6.2.new | Chapters 7, 8, and Appendices | Mandatory recycling | Sierra Club (Dan Andrews) | 27-Jun-2016 | First paragraph "encouraged" – Frederick County needs to make recycling and composting mandatory at some point – if a three bin system is truly offered. Perhaps begin change with incentives, after several years, consequences for noncompliance may be appropriate. | No | Yes | As part of the Phase 2 analysis of a three-bin system, voluntary versus mandatory systems will be evaluated. |
| 30 | 6.2.new | Chapters 7, 8, and Appendices | Mandatory recycling | Sierra Club (Dan Andrews) | 27-Jun-2016 | Phase 2 should also include: Possible mandatory recycling for residents. Possible mandatory recycling for small businesses | | | |
| 31 | 6.2.new | ES, Chapters 7, 8, and Appendices | Mandatory recycling | Pokiemba, Veronica | 12-Jun-2016 | Recycling from Businesses The Study acknowledges that Montgomery Co. requires businesses to recycle, and that recycling from businesses generates one half the recyclables for the county. However, the Study deletes exploration of what could be gained with mandatory recycling for businesses in Frederick Co. as an option for further study. The Study questions how much control can the county exert (section 6.2.7). I think it is possible for the county to exert control and this should be examined. It is important to note that the Study indicates that the area with the most potential for recycling gains is paper (4.2.3)*. *According to the Study, materials with the largest potential for additional recycling are paper and cardboard (p. 37.) The Study then recommends a dirty Mixed Waste Processing Facility which results in increased contamination of paper and cardboard (p. 47). See section on Resource Recovery Park/Mixed Waste Processing Facility for further review of this issue. | No | Yes | As part of the Phase 2 analysis of a three-bin system, voluntary versus mandatory systems will be evaluated. |
| 32 | 6.3.2 | 6.3.3 | Composting | Norris, Linda | 15-Jun-2016 | I) Composting. I am very glad to see organics recycling in all its various forms given such emphasis in the report. The comments that follow come from my experience as a former recycling manager and staff member of the US Composting Council: a. A period of preparation time of several years is realistic for this process; which can include transitioning activities to ensure the success of either community composting or large scale composting endeavors. During this preparation period several things should occur: i. The County should undertake a serious regional markets study before choosing the level of compost production facility. County staff and the SWAC should talk with both private sector and public sector programs involving food scraps about challenges in collection and ease of marketing the material. Relationships should be built with golf courses, landscapers, local forestry experts (erosion control/stormwater mitigation), MDOT and SHA to ascertain the specs they need for compost they accept--these will be some of the major markets, and the program should be built and sized around their requirements. ii. Studies of actual food scrap amounts and quality from restaurants should be made before relying on this sector for the tonnage recommended. In my experience most communities begin with the more homogenous feedstocks that come from hospitals, detention centers, colleges/universities and large institutions with cafeterias, before embarking on the riskier, more diverse restaurant feedstocks. iii. A rapid move into revising zoning code is necessary because current zoning does not support community scale and farm composting. iv. The DUSWM should expand its home composting education program (many grants are available for this) to reach thousands of citizens per year out in their communities to put a "composting mindset" in place that will help prepare citizens for the eventual shift from municipal solid waste collection to organic | No | Yes | The breadth of these comments will be considered as both small and large scale composting programs are assess during the Phase 2 analysis. |

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| 33 | 6.3.2 | 6.3.3 | Public vs private | Norris, Linda | 15-Jun-2016 | I strongly urge the county to operate the composting program and resource recovery facilities with as much private involvement as possible. In my experience, when the public sector is in charge of a program involving recycling commodities/markets, decisions made and resources devoted are not as bottom-line oriented and it is easier to shrug and say, "we can give the compost away" which a) will not happen in the private sector due to profitability requirements and b) hurts compost markets in the long run by underselling others who are producing valuable compost. | No | Yes | These comments will be considered as both small and large scale composting programs are assessed during the Phase 2 analysis. |
| 34 | 6.3.6 | ES, 4.3.4, 8.4 | RRPs - cost | Sierra Club (Dan Andrews) | 27-Jun-2016 | These facilities are very expensive (2 – 2 ½ times more than a clean MRF) and still output a lot of discards - see top of page 80 – over 80,000 tons of total discarded waste for a \$60 million investment! That's the tonnage Carroll Co. currently ships to Chambersburg PA! The data at the top of pg. 80 should be placed in a table for clarity, it's too confusing. | No | Yes | All cost and assumptions will be further evaluated in Phase 2. |
| 35 | 6.3.6 | ES, 4.3.4, 8.4 | RRPs - cost | Sierra Club (Dan Andrews) | 27-Jun-2016 | Second paragraph, pg. 80 please explain the 10,000 tons of residuals (for disposal)? | No | Yes | |
| 36 | 6.3.6 | ES, 4.3.4, 8.4 | RRPs - cost | Sierra Club (Dan Andrews) | 27-Jun-2016 | Seventh paragraph "Residual Disposal Cost" don't match the first paragraph 80,250 tons/year. I'm confused. Could the cost of \$620,000 be too low? | No | Yes | |
| 37 | 6.3.6 | ES, 4.3.4, 8.4 | RRPs - modular | Rudy, George, PE | 3-Jun-2016 | Develop and implement a "modular prototype" resource recovery park based on the baseline near-term waste streams. Said modular resource recovery park can be readily expanded in years to come via modular additions to accommodate waste stream increases. In support of Frederick-based waste-specific recycle businesses, said businesses would be given first option to accept Resource Recovery Park output; that is, separated waste-specific streams. | No | Yes | Your suggestion will be provided to the Consultants |
| 38 | 6.3.6 | | C&D waste | Sierra Club (Dan Andrews) | 27-Jun-2016 | There should be some mention that C&D waste recycling would decrease hauling costs and save landfill cell space. Also mention the dollar value of a cubic yard of landfill cell space. | No | Yes | C&D waste will be evaluated as part of the RRP. Geosyntec will refine cost data in Phase 2. |
| 39 | 6.3.6 | | C&D waste | Sierra Club (Dan Andrews) | 27-Jun-2016 | Develop a C&D waste facility should be studied as well. Even though it's not MRA waste, this shouldn't impact this decision. C&D is a huge weight problem w/ potential local solutions. Again, the study time shouldn't be that great. | No | Yes | |
| 40 | 8.1 | | Export | Sierra Club (Dan Andrews) | 27-Jun-2016 | "continued export of waste ... are more cost-effective than any other option" Please include that this is – when not factoring in externalized future environmental costs to PA & VA. Externalized costs need to be placed in people's minds. There is no such thing as "away", when it comes to waste! | No | Yes | Out-of-state disposal is being carried forward for further analysis since this is the "no change" option, our baseline, and the option to which all alternative options are compared. This option will therefore receive further consideration and refinement of data in Phase 2. We will ask Geosyntec to consider externalized cost. |
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| 41 | ES | 6.2.3, 8.1 | Bans/fees | Sierra Club (Dan Andrews) | 27-Jun-2016 | Paraphrasing: [Eliminating bans/fees on single-use items from further analysis is a mistake and the option should be investigated] | No | No | Bans and fees were analyzed but not selected for further analysis in Phase 2 because they did not rank as high at other options using the waste minimization, environmental impact and cost criteria and weights developed from the public forums. |
| 42 | ES | 6.2.6, 8.1 | Bottle bill | Sierra Club (Dan Andrews) | 27-Jun-2016 | Paraphrasing: [Eliminating a bottle bill is a mistake and the options should be investigated] | No | No | A 'bottle bill' was not among the options chosen for further analysis as it would necessitate state legislative action prior to implementation. |
| 43 | ES | 6.2.6, 8.1 | Bottle Bill | Bartelt, Jeannette | 20-Jun-2016 | Implement a Bottle Bill. This has worked in other states really well. | | | |
| 44 | ES | 6.2.6, 8.1 | Bottle bill | Sierra Club (Dan Andrews) | 27-Jun-2016 | The consultant could state that the Fred. Co. government could support this effort and ask the delegation to pass the bill. Three billion bottles are discarded in Md. each year. This would also help to change the Fred. Co. citizenry mindset. | | | |
| 45 | ES | 6.2.9, 8.1 | Expanded household composting | Sierra Club (Dan Andrews) | 27-Jun-2016 | Paraphrasing: Eliminating [expansion of household recycling] from further analysis is a mistake and should be investigated. Expanding household composting should be studied, due to potential benefits. These areas are not very time intensive and should not be eliminated from the Phase 2 study. | No | No | Household composting was considered but not selected for further analysis in Phase 2 because it did not rank as high at other options using the waste minimization, environmental impact and cost criteria and weights developed from the public forums. The County may consider such options in the future. |

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| 46 | 1.1 | | NMWDA | Rudy, George, PE | 3-Jun-2016 | <p>As experienced and exhibited during the Waste-to-Energy Incinerator days, the Northeast Maryland Waste Disposal Authority [NMWDA] had and appears to have no relevant experience and expertise to front Frederick County's long-term "What's Next" waste management scoping and development initiatives and end-product programs. To that end, Frederick County should terminate any and all contractual relationships with the NMWDA, and use the NMWDA annual fee assessed [assumed to be at least \$200,000 plus] to establish the required "What's Next" management infrastructure within the Frederick County system. Frederick County is well qualified to establish the waste program infrastructure, and to identify and contract the needed waste handling and processing "subject matter experts" in support of same. It should be noted that during the 2016 "legislative session" in Annapolis, the NMWDA was in a near continuous word-smithing debates with the Legislators and several private-interested citizens regarding its name and its overall mission. In all transactions, the NMWDA continued to portray a misleading mission statement which included in fact incineration options. It is therefore the responsibility of Frederick County to contract for waste program support [independent of the NMWDA], and with only those programmatic and technical resources that operate in accordance with the waste governing criteria that have been established based on the Frederick community suggestions as set forth during the "What's Next" "public open forms," and which are documented in the Phase I Waste Management report [Ref. 1]. It is recognized that the NMWDA is operating at a "conflict of interest" relative to the "What's Next" program and Frederick County's best interests.</p> | No | No | <p>The County, through an existing contractual mechanism provided by the Northeast Maryland Waste Disposal Authority, chose Geosyntec to assist in the "What's Next" process. Geosyntec and its subcontractor team were chosen by the County based upon their community engagement and waste management technical expertise. The Steering Committee makes decisions with support from DUSWM and the County Executive, but NMWDA has no role in the decision-making.</p> |
| 47 | 1.1 | | NMWDA | Rudy, George, PE | 3-Jun-2016 | <p>Define the County "waste management" infrastructure - the objective is to define within the "What's Next" mission a standalone waste management infrastructure within the County that operates totally independent of the Northeast Maryland Waste Disposal Authority [NMWDA].</p> <p>Operating independent of the NMWDA enables the County to be totally in-charge of said waste program, with the ability to vet candidate contractors directly and select appropriate support contractors from Frederick community recognized waste "subject matter experts." Likewise, the recommended approach terminates the UNNEEDED (a) annual fees [assumed to be at least \$200,000 at least] charged to the County as set forth by the NMWDA, and (b) the NMWDA service fee [estimated at 10 percent of contract charges] which is being charged for the current Geosyntec "What's Next" contract.</p> | No | No | |
| 48 | 1.2 | | Characterization study | Gallagher, Patrice | 16-Jun-2016 | <p>[A recommendation from Susan Weber advocates] the importance of a waste characterization study so we know we are basing our assumptions and plans on good data.</p> | No | No | <p>Considering several Maryland Counties in the region have undertaken waste characterization studies in the recent past, it was determined that performing a separate study for Frederick County would not be a wise use of time or capital resources.</p> |
| 49 | 1.2 | | Hazardous and radioactive waste | Rudy, George, PE | 3-Jun-2016 | <p>The "residential" waste sources are but a small portion of the waste sources and streams within Frederick County. ... The "What's Next" program should ... control ... all conventional ... toxic, bio-technology and radiological sources within the County. The objective is ensure that all [that is, residential, non-profit, commercial, and industrial] waste sources ... are in compliance with the governing waste criteria as established by the "What's Next" program initiatives.</p> <p>Toxic-hazardous waste collection from medical centers, hospitals, and bio-technology research laboratories and production facilities - ensures that all waste streams [inclusive of Government and commercial sources] within the County are compliant with the What's Next solid [and liquid] waste management criteria.</p> <p>... The scope of toxic-hazardous waste [that is, medical, biological, and radiative] within the County replicates the waste streams that exit at NIH, and which are addressed explicitly in the NIH Waste Disposal Guide [Ref. 2]. It is recommended that the NIH Waste Disposal Guide [Ref. 2] be a resource to the "What's Next" Committee and its consultants in addressing said toxic waste streams.</p> <p>... Toxic-hazardous waste streams cannot operate outside the County's waste management program. By including said toxic-hazardous waste streams [directly or by agreed upon compliance] ensures the Frederick community that the evolving waste management programs are all in compliance with the County's governing criteria. ... No one ... within the County should be allowed to operate in a freelance mode independent of the governing County defined and managed program.</p> | No | No | <p>The focus of this study is targeted to the residential, commercial, and institutional sources of solid waste managed by Frederick County. The county does not manage toxic-hazardous or radiological waste; however, these waste streams are regulated and managed by both state and federal agencies.</p> |

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| 50 | 2.2 | | Recycling and composting | Rudy, George, PE | 25-Jun-2016 | <p>... Page 17 of the Phase I report [Ref. 1] ... presents the types of waste streams, but does not explicitly identify the waste stream sources. It is my opinion that the report should include a table which identifies each source, and the scope of each source. Likewise, said table should explicitly identify by name waste sources [in addition the Ft. Detrick] which are not within the scope of the County's waste management program, such as the following:</p> <ul style="list-style-type: none"> \$ commercial bio-tech laboratory waste \$ hazardous medical waste \$ other. <p>Said report should have an appendix which discusses how the above noted wastes are handled and where the noted waste streams go to be processed.</p> <p>... The Phase I report ... should explicitly identify the waste sources and scope thereof which are included in the waste type tabulations presented on page 17 [Ref.1], for example, but not limited to:</p> <ul style="list-style-type: none"> \$ residential - 100 % of single homes \$ residential - ?? Multi-family units \$ business offices - ?? \$ industrial facilities - ?? \$ shopping centers - ?? \$ restaurants, grocery stores, special event venues - ?? \$ public and private schools & colleges - ?? \$ other - ?? <p>Without the above noted detail, I fail to see how one can structure and define a detailed path forward which captures, controls, and meets the desired waste management processes and objectives. Hence, the waste source detail is a must, and it is not included in any manner in the Phase I report. ... without detailed waste source information, it will be impossible to define a meaningful "trash" reduction program during Phase II.</p> | No | No | The focus of this study is targeted to the residential, commercial, and institutional sources of waste managed by Frederick County, including the waste from single family homes, multi-family units, industry, schools, and various types of businesses. We have been advised, however, that detailed data on the latter is not readily available. |
| 51 | 2.2.1 | | Recycling | Rudy, George, PE | 3-Jun-2016 | <p>The "What's Next" committee needs to review and clarify a policy regarding the collection of shredded paper. Personally, I generate a large trash bag of shredded business papers every two weeks. On numerous occasions, the recycle waste collectors refuse to accept the large trash bag of shredded paper. The noted problem of "refusal to accept" trash bags of shredded paper was a topic on a recent WFMD afternoon session. A clarifying "policy" regarding the noted shredded paper collection method is required for the benefit of the County residents and business entities, as well as the recycle collectors.</p> | No | No | Your comment has been passed on to County staff. Staff has confirmed that shredded paper is accepted if: 1) placed in a paper bag 2) placed in a plastic bag marked with a recycling symbol or 3) taken to the Reich Ford Road Recycling Facility. |
| 52 | 2.2.2 | | Composting | Rudy, George, PE | 3-Jun-2016 | <p>Yard waste collection, handling and processing - the "What's Next" waste program will include and continue to encourage use of the County sponsored County-wide yard waste collection and processing centers which are located at the Walkersville Heritage Park and ("other site" - name unknown to writer).</p> | No | No | Yard waste drop off is available to residents and businesses in Fredrick County for no charge at two County Yard Waste Collection Sites: Walkersville's Heritage Farm Park (residential use only) and the Reich Ford Road Mulch and Composting Facility (residential and commercial use). |
| 53 | 2.6 | | Education and Outreach | Sierra Club (Dan Andrews) | 27-Jun-2016 | <p>There should be some mention of the existing county staff devoted to recycling operations – and make a comparison to the staffing levels in Montgomery County with a population of one million people. Frederick County has a about 240,000 people.</p> <p>Also, perchance mention: how much does Montgomery County spend on education and outreach? There has to be proper education and outreach, with enough staff, to achieve goals. More money spent up front may save a lot of money spent at the rear of the process.</p> | | | |
| 54 | 2.6 | | Education and Outreach | Gallagher, Patrice | 26-Jun-2016 | <p>[a recomedation from Susan Weber is] inclusion of a Research Center in our Resource Recovery Park</p> | | | |
| 55 | 2.6 | | Education and Outreach | LeBlanc, Phil | 25-Jun-2016 | <p>[How will the Steering Committee address the issue of] Behavioral Change?</p> | | | |
| 56 | 2.6 | | Education and Outreach | LeBlanc, Phil | 25-Jun-2016 | <p>A tilt toward the easy, less painful direction of doing "more for the citizen" verses facilitating self-reliance, "helping them help themselves verses doing it for them". What about more study/results concerning behavioral change.</p> | | | |
| 57 | 2.6 | | Education and Outreach | LeBlanc, Phil | 25-Jun-2016 | <p>The report seems little slant toward industrial engineering without social engineering. A little of "Create a facility" to solve the issue verses "support/require the citizen taking care of themselves through good and appropriate action/behavioral change".</p> | | | |
| 58 | 2.6 | | Education and Outreach | LeBlanc, Phil | 25-Jun-2016 | <p>A significant areas in the study note "behavioral change" as being an important component of any option/action but the study does not directly offer ways or expertise in same. Sense this is important it would seem we should require that Phase 2 include extensive recommendations in this area (behavioral Engineering) and that Geosyntec provide some of its expertise in this area.</p> | No | Yes | Education and outreach will be integral components of any fundamental change to the waste management system and will be considered in conjunction with any new option adopted. |
| 59 | 2.6 | | Education and Outreach | Sierra Club (Dan Andrews) | 27-Jun-2016 | <p>Phase 2 should also include: Education and outreach & appropriate staffing levels. Monitoring and enforcement within Frederick County</p> | | | |

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| 60 | 2.6 | | Education and Outreach | Sierra Club (Dan Andrews) | 27-Jun-2016 | What is the Counties role with regard to Source Reduction? Specifically, how will the County promote waste reduction efforts? | | | |
| 61 | 2.6 | 6.2.5 | Education and Outreach | Norris, Linda | 15-Jun-2016 | [The 3-bin option] is an exciting move forward, but I urge the county first to invest additional funds into an education program on the existing single stream program to increase amounts recovered under the existing contract. Having a municipal recycling liaison on county staff whose job would be to partner so as to leverage the recycling going on in the county's many towns and homeowners associations and Frederick City would be a much smaller investment and pull greater (and higher quality) tonnage from these locations. This would add tonnage more quickly and less painfully than adding a new material---organics-- until the markets are fully established for compost, which can often take 3-5 years to establish successfully after community composting or large scale composting facilities begin operation. | | | |
| 62 | 2.6 | 2.Other | Monitoring and enforcement | Poklemba, Veronica | 12-Jun-2016 | "Eliminated from further exploration in this Study are Measures to increase and expand public education [and] Measures for monitoring and control/enforcement (p. 56) Identified as "Beyond the Scope of this Study". Without any monitoring how is it possible to determine if the County is reaching identified goals. If the citizens are not educated, how can they be expected to successfully participate in reaching any goals. If the county sets a goal of recycling in ALL schools (some schools recycle now, some don't) and composting of food scraps in schools; it will be necessary to provide both education and monitoring. | No | No | Monitoring and enforcement are vital to the effectiveness of any solid waste management program. "Enforceability" was one of the criteria identified in the public forums that Geosyntec used to evaluate options in Phase 1. After the Steering Committee recommends a solid waste disposal option(s), the Department will consider monitoring and enforcement. |
| 63 | 4.2.3 | | Recycling | Sierra Club (Dan Andrews) | 27-Jun-2016 | "Generators Targeted" bullet: You mention "non-residential generators" -- but you should clearly state, businesses. Why isn't business recycling included in this report? Especially smaller businesses, perhaps under a certain floor space size. | No | No | The paragraph in question, from the literature review, states it concerns businesses and other nonresidential waste generators recycling practices. |
| 64 | 5.2 | | Waste diversion data | Sierra Club (Dan Andrews) | 27-Jun-2016 | Table 5-2. Since waste and organic matter are mixed in the "Overall Recycling Approx. 50%" figure, add another line to the table which shows the actual waste recycling (less the organic matter). I calculated 43%. I feel that combining the manmade waste with the organic waste confuses the entire problem. Make the problem clear, that way it can be solved properly. | No | No | The targets were established by the Maryland ZWP. |
| 65 | 6.1.1 | | Household composting | Sierra Club (Dan Andrews) | 27-Jun-2016 | I don't agree with your absolute statement that increasing household composting would make a small contribution to the target level -- please explain why. | No | No | The Expand Household Composting program worksheet in Appendix D outlines expected outcomes. |
| 66 | 6.2.1 | | School recycling | Sierra Club (Dan Andrews) | 27-Jun-2016 | What is your school recycling statement based on? You assume here, which you shouldn't do. What are the schools really doing w/ regard to recycling? Also, what is the 1,240 tons/yr. of school organics based on? You assume here? | No | No | Phase 2 will address school recycling in detail. The worksheet provides the basis for the 1,240 tons/year of school organics. It should be a yes in consider for Phase 2? |
| 67 | 6.2.3 | ES | Bans/Fees | Bartelt, Jeannette | 20-Jun-2016 | Ban/fee on single use materials. This two has worked well in other counties and states. | | | |
| 68 | 6.2.3 | ES | Bans/Fees | Fry, Gabrielle | 20-Jun-2016 | Ban styrofoam / polystyrene | No | No | Bans and fees were considered but not selected for further analysis in Phase 2 because they did not rank as high at other options using the waste minimization, environmental impact and cost criteria and weights developed from the public forums. The County may reassess this option in the future. |
| 69 | 6.2.4 | ES, 8.3 | PAYT | Holstein, Bruce | 20-Jun-2016 | The report rejected Pay As You Throw (See pages 3 of summary and 65). The report is wrong in the way they described the PAYT trash bag program. They claimed it was too costly for the County. ... It works and it reduces residential solid waste by up to 44%. ... Geosyntec used a high price of \$2 per bag which is arbitrary. They failed to mention that bag prices are set by the County. The County could set the bag price at any amount they want. I am using \$1 per bag in my discussions in Carroll County. ... | | | |

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| 70 | 6.2.4 | ES, 8.3 | PAYT | Sierra Club (Dan Andrews) | 27-Jun-2016 | <p>PAYT is not addressed properly. You only mention a bag system - but don't mention tags/stickers and container systems. Your referenced cost of \$2 to \$2.25 per discarded bag is too low. Republic waste locally charges \$3.50 per sticker-ed discarded bag.</p> <p>You don't mention potential cost savings to residents or substantially increased recycling rates.</p> <p>I don't think this topic was give proper justice.</p> <p>There's an opportunity for the county to help municipalities offer PAYT / SAYR programs to communities with the proper collection density!</p> <p>There can be a great deal of diversion here – being "fully cognizant of zero waste principles and goals" as you stated previously on pg. 51.</p> <p>PAYT may also be a revenue generator, which isn't mentioned.</p> <p>This entire section needs to be revised.</p> | No | No | <p>PAYT was considered but not chosen for further analysis due primarily to the fact that the collection of waste is controlled by 12 municipalities and other entities that exist within the County. The structural changes necessary to implement a county-wide PAYT program are outside the County's current authority. The County may reassess this option in the future.</p> |
| 71 | 6.2.4 | ES, 8.3 | PAYT | Norris-Waldt, Linda | 15-Jun-2016 | <p>Although I agree with the difficulty in ease of implementation countywide, this option was erroneously presented in its evaluation due to the assumptions made by the consultant. There are myriad scenarios with widely varying costs (the example given was unnecessarily expensive in my estimation). There are serious benefits both to the citizens and to waste diversion in this program, and encouraging haulers and communities who control the hauling contracts to offer this model (ADS is already willingly doing so) through incentives, financial and educational assistance, was not even considered. I continue to believe a pilot program in a community volunteering to try this will show its benefit and should be included in the county's solid waste plans.</p> | No | No | |
| 72 | 6.2.4 | ES, 8.3 | PAYT | Burruss, Ellis | 31-May-2016 | <p>Pay-as-you-throw (PAYT) is listed as NOT being recommended for further study. PAYT should be considered because the recommendation is based on assumptions that may not be valid. In section 6.2.4, "For it to be successful and fair to all residents, it is assumed that PAYT would be implemented across all households in Frederick County, assumed to consist of about 76,000 single family homes (SFHs) and a further 14,000 units in multi-family dwellings (MFDs). SFHs are already offered curbside recycling by the County. Similar access to recycling will also have to be available at all MFDs if PAYT is implemented." In the first place PAYT is recognized as an effective economic incentive to increase recycling ...</p> | No | No | |
| 73 | 6.2.4 | ES, 8.3 | PAYT | Gallagher, Patrice | 16-Jun-2016 | <p>Having listened to several presentations on the effectiveness of PAYT or Save as You Throw programs, I am reluctant to see us not study this option further. I've looked at Ellis' calculations and would like to see further analysis of those... also would like a more concrete plan to look at incentivizing municipalities to institute PAYT pilots.</p> | No | No | |
| 74 | 6.2.4 | ES, 8.3 | PAYT | Bartelt, Jeannette | 20-Jun-2016 | <p>In order to increase the waste a "Pay-as-you-Throw" program should be implemented. I personally (family size of two) put out one bag of trash per week. If I could recycle food waste that may be reduced in half.</p> | No | No | |
| 75 | 6.2.7 | | Businesses | Sierra Club (Dan Andrews) | 27-Jun-2016 | <p>Grocery stores only generate 900 tons per year of compost? Less then the entire school system? This needs to be explained... Excluding grocery stores and larger institutions from composting is a mistake – another double standard, especially to restaurants!</p> | No | No | The worksheet clearly articulates the basis for its assumptions. |
| 76 | 6.2.7 | | Businesses | Sierra Club (Dan Andrews) | 27-Jun-2016 | <p>Why are small businesses excluded? This is a double standard and sends the wrong message to the populous.</p> | No | No | There is nothing in the report or its assumptions that excludes small businesses and they will be included in all appropriate analyses. |
| 77 | 6.3.2 | | Community Composting Programs | Rudy, George, PE | 3-Jun-2016 | <p>Community-scale, decentralized composting program – Food waste and other organic material would be collected for composting at small facilities. This could serve as a pilot for a larger-scale operation. (hard)</p> | No | No | The Steering Committee expects that the evolution of the County's solid waste system will be a dynamic process and will build upon past experiences. |
| 78 | 6.3.3 | | Composting | Sierra Club (Dan Andrews) | 27-Jun-2016 | <p>\$25 million for a large scale composting facility seems very high – again use Alpha Ridge as a construction and operating cost benchmark – and ratio and proportion to Frederick County.</p> | No | No | <p>These comments will be considered as both small and large scale composting programs are assessed during the Phase 2 analysis;jd Should this have a YES in consider for Phase 2?</p> |
| 79 | 6.3.3 | | Composting | Rudy, George, PE | 3-Jun-2016 | <p>Development of a large-scale, centralized composting facility – A central countywide facility would process separated organic materials: primarily food waste, yard waste, and non-recyclable.</p> | No | No | |
| 80 | 6.3.9 | | New landfill | Sierra Club (Dan Andrews) | 27-Jun-2016 | <p>New landfill capital costs seem too low – what did the Washington County, 40-West landfill cost to build? And operate annually? It's relatively new, so their figures should be useful for this report! Please explore.</p> | No | No | Thank you for your suggestion. The Phase 1 Report does not recommend a new landfill for further analysis in Phase 2, hence no further analysis is required in Phase 1. |

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| 81 | 2.2.3 | | Recycling costs | Sierra Club (Dan Andrews) | 27-Jun-2016 | ~ Figure 2-1 on pg. 17 should show an additional bar chart which shows the waste stream with the "Yard Waste & Compostables" (30,000 tons) removed, and percentages. This will help the reader understand there are really two separate issues to be dealt with, viz; man-made waste matter & organic matter. Clearly depict the problem. Also, the word "Compostables" in Figure 2-1 should be changed to "Wood/Brush Material" since this is what it is. You should make this chart very clear to the reader. | | | |
| 82 | 4.2.3 | | Recycling | Sierra Club (Dan Andrews) | 27-Jun-2016 | First paragraph: What about the "potential of additional recycling of" ferrous metal and non-ferrous aluminum? Second paragraph: What is the increased cost of single stream recycling? What is the contamination rate? | | | |
| 83 | 4.2.3 | | Recycling | Sierra Club (Dan Andrews) | 27-Jun-2016 | Green rectangular box: Describe Montgomery County staffing levels. | | | |
| 84 | 4.2.3 | | Recycling | Sierra Club (Dan Andrews) | 27-Jun-2016 | A separate bulleted paragraph should mention: land filling and incineration externalizes waste costs! There are direct costs to deal with, and try to process, landfill leachate. Also, there will be huge future costs to Pennsylvania and Virginia when the landfill liners begin to fail, thus causing ground water contamination – a super long term problem. With incineration, there are externalized air quality health costs to nearby communities to include flora and fauna, as well as toxic ash disposal costs. By the way Montgomery County ships their toxic ash to southern Virginia, as they don't want to deal with that locally. Again, externalizing the long term problem. | | | |
| 85 | 4.2.3 | | Recycling | Sierra Club (Dan Andrews) | 27-Jun-2016 | A separate bulleted paragraph should mention: As the human population continues to grow, with the expectation of a higher and consumptive standard of living, waste products will be needed as a material resource. | | | |
| 86 | 4.3.1 | | Composting | Sierra Club (Dan Andrews) | 27-Jun-2016 | Green rectangular box: List the cost to build and operate these facilities. | | | |
| 87 | 4.3.2 | | Anaerobic digestion | Sierra Club (Dan Andrews) | 27-Jun-2016 | Also, under "Limited Operating History": Perhaps mention Mason Dixon Farms in PA, which has a long operating history of composting cow manure. | | | |
| 88 | 4.3.2 | | Anaerobic digestion | Sierra Club (Dan Andrews) | 27-Jun-2016 | Top paragraph: List the cost to build and operate this AD plant. | | | |
| 89 | 4.3.5 | | Refuse Derived Fuel | Sierra Club (Dan Andrews) | 27-Jun-2016 | Under Refused Derived Fuel (RDF) – Please tell the readers where RDF is burnt! And if it's in cement kilns, are the same EPA and MDE air quality regulations applied to cement kilns as they are to electrical power plants and waste incinerators. | No | No | |
| 90 | 4.3.5 | | Refuse Derived Fuel | Sierra Club (Dan Andrews) | 27-Jun-2016 | I was informed by the Washington County Government Solid Waste Director, that the Martinsburg W.V., Entsorga Plant is under construction. Can you verify this? And report | | | |
| 91 | 4.4 | | Waste Diversion | Sierra Club (Dan Andrews) | 27-Jun-2016 | "Waste-to-Energy as recycling (Maryland does not)" statement: Can you verify this? I've learned otherwise. so, if that's accurate? | | | |
| 92 | 4.4 | | Waste Diversion | Sierra Club (Dan Andrews) | 27-Jun-2016 | The Massachusetts reference makes sense, and should be underlined. | | | |
| 93 | 5.1.1 | | Recycling | Sierra Club (Dan Andrews) | 27-Jun-2016 | Please verify this statement [2nd bullet] | | | |
| 94 | 5.2 | | Waste diversion data | Sierra Club (Dan Andrews) | 27-Jun-2016 | Beneath Table 5-3 add another table which depicts Frederick Counties' 137,000 tons of land filled "trash" based on the average audit percentages from the other counties listed in Table 5-3. By my calcs.: Recyclables 56,200 tons, Yard Waste & Wood/Brush Matter 45,200, Discards 35,600 tons. | | | |

The Steering Committee received a number of comments suggesting new materials, data, and statements be added to make this report more valuable to a general audience. We acknowledge the enthusiasm behind these suggestions but want to keep the report focused upon its primary purpose. The Phase 1 Report was written by Geosyntec to the Steering Committee to summarize the work they performed to narrow the universe of solid waste management options to those recommended for further analyses. Materials that did not play a direct role in these analyses and would not change the conclusions will not be included so the process by which Geosyntec reached its recommendations is clear. Useful materials are listed on the "What's Next?" website. Members of the public may make suggestions for additional materials there.

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| 95 | 5.2 | | Waste diversion data | Sierra Club (Dan Andrews) | 27-Jun-2016 | Show a useful new table which depicts what "may" be in the Frederick County 137,000 tons of trash, viz; 18% food scraps 17% paper 17% plastic 3% metal 2.7% glass | | | |
| 96 | 6.2.1 | | School recycling | Sierra Club (Dan Andrews) | 27-Jun-2016 | You should mention that bans/fees have an educational effect on the populous which will help overall recycling. | | | |
| 97 | 6.2.1 | | School recycling | Nicholson, Sherry | 2-Jun-2016 | Comments described general potential of increasing recycling at schools. An example was cited with regard to PS 29 in Brookly acheing a 70% diversion rate. | | | |
| 98 | 6.3.2 | | Composting | Sierra Club (Dan Andrews) | 27-Jun-2016 | For comparison here, please obtain the Howard County construction cost, and annual operating costs for the Alpha Ridge composting operation. List these in this area for accuracies sake. I feel that community scale composting facilities may be more cost effective than a large scale facility. Community scale facilities also localize the compost operations, which makes sense for reducing transportation pollution and transport costs of the heavy material. Local use of the compost also makes good sense. | | | |