

Comment 1

Tuesday, February 14, 2017

To: WhatsNext

Subject: Suggestions for the Steering Committee

To the Solid Waste Steering Committee,

I am unable to attend your meeting this Thursday so I thought I'd send along some ideas for reducing waste in Frederick County.

-The obvious one is get a comprehensive composting plan for the county especially restaurants. I know this is in the works but it's worth repeating.

-“Free cycle week”: similar to “bulk trash”. Instead of the city collecting the leftovers, at the end of the week people take their own stuff to the dump. Likely won't be much with all the poachers that drive around in their big trucks. The city wouldn't have to do anything except promote it and give citations to people who don't get rid of their stuff within a timely fashion.

Jd-The city of Frederick had a similar plan that was discontinued primarily because of cost,. Contributing factors included restricted access to sidewalks and street parking because of the bulk trash strewn about. The city now has a once a year “free cycle” at the stadium where you take your goods and they are claimed by a non profit or individual and the surplus is disposed of by the city. Considering the county does not provide trash collection, this plan is more suited for the municipalities.

-A compost liaison for Farmer's and local restaurants. There's talk of this happening on May 21th at the Compost Summit. I've heard about this happening in other places and would be great to do this in Frederick. Farmer's pair with restaurants who need to get rid of food waste. Happy pigs, or free compost.

Jd-Great idea! Ideally this should be a private vendor that collects from local businesses and delivers to a farm for animal food or a compost facility for processing.

-Required local downtown business recycling bins.

jd-The county provides single stream recycling to single family homes and townhomes. Multi-family units are required under state law to provide recycling for their residents. There are no requirements for commercial, institutional or public space recycling; however, public events that are expected to have more than 200 people in attendance are required to provide recycling. Hopefully the outcome of this study will be the impetus for more focus on recycling and organics diversion by municipalities.

-A tax incentive to any businesses that adopt Zero Waste principles.

Jd-This would require legislation that had a well defined process, i.e. how to define “zero waste principles” and how to ensure those businesses claiming the tax incentive are actually adhering to those principles. It is something that could be explored in the implementation phase. The ideal situation would be to develop a process that encourages participation rather than incentive participation.

-Tax incentives to local restaurants or businesses that hire private composting companies if we are unable to get comprehensive composting.

Jd-I am not sure what “comprehensive composting” means but as stated above, it is always better to implement a process that encourages compliance before incentives are added.

Recommendations:

1) Text Change to Phase 2 Report. None

2) Consider recommendations in implementation phase

Comment 2

Wednesday, February 15, 2017

To: whatsnext

Subject: suggestions for solid waste task force

Hi,

I'm a resident of Frederick and would like to suggest the following suggestions for the solid waste task force:

- A “Free cycle week” where residents place useful, unwanted items at the curb for a week for others to take for free. Then at the end of the week residents would be responsible for taking their leftovers to the dump. The city wouldn't have to do anything except promote it and give citations to people who don't get rid of their items within a specified time frame.

[jd-See response to comment 1](#)

- Improving recycling for local businesses. It seems as though many local businesses do not recycle, which certainly has a significant impact on the amount of solid waste going to the dump. How can we provide incentives or recycling services to commercial entities? And perhaps provide special tax incentives for those who adopt zero waste principles including composting?

[jd-See response to comment 1](#)

- Offer residential recycling more often - At our house, our recycling container is overflowing after two weeks and there is only two people in our household. I imagine larger households are collecting even more recyclables that probably end up in the trash because there is no room in their recycling containers. Can we provide weekly recycling for residents?

Jd-Thanks for being an avid recycler! It is unlikely that curbside single stream recycling will be provided more than every other week. The cost is the primary driver, but the set out and participation rates in the residential recycling program do not warrant the increased cost associated with increasing collection frequency. I am not sure what size cart you have but you can ask for a larger cart up to 96 gallons for no charge. Additionally breaking down cardboard before putting it in the bin, or if necessary bundle and set beside the bin, may help.

Thanks so much for your consideration of my suggestions and your important work related to moving toward zero waste in Frederick County.

Recommendations:

- 1) Text Change to Phase 2 Report. None
- 2) Consider recommendations in implementation phase.

Comment 3

April 20, 2017

To the Frederick County Solid Waste Steering Committee:

Thank you for the work you have been doing for Frederick County on this subject. I wanted to be there in person to deliver these comments, but I'm doing a vermicomposting presentation to a 4H Club in Jefferson scheduled months ago at the same time, so I am sending these via email.

I read the Phase 2 Report with great interest, and offer the following comments:

Centralized Composting Facility: The idea of postponing a centralized composting facility and A/D project is a good one. The composting and organics recycling culture in Frederick County is still pre-infancy, and the possibility in the short term that we will collect enough material to meet both financial and diversion goals is very unlikely.

Jd-Agree!

SSO Phase I

I would like to reiterate my comments from Phase I: that focusing on downtown restaurants with relatively low amounts per-unit of food waste – be it pre, or post-consumer, could be a recipe for trouble. I understand it is politically attractive and makes folks feel good, but focusing on grocery stores, nursing homes, the detention center, colleges and large business (hospital for example) with cafeterias is likely to produce a better end product, less sortation and processing costs, and better learning for a county that is very new to food waste composting. I recommend

adjusting the first two pilot phases to swap in these kinds of facilities for the restaurants recommended now.

Jd-Good advice! Will consider including in “additional recommendations” from the committee.

Compost End Product

While I can understand the consultants need to be conservative, I urge you not to adopt the idea that 50% of our compost will be sold only at \$20/CY with the remaining sold at \$7.50/CY. I strongly urge you to involve the private sector in developing the composting facilities and providing them incentives to reach a higher price for compost. GOOD MARKETABLE END PRODUCT that can be used and sold to landscapers, golf courses, used in state and local bids for amending fill, for erosion control, stormwater management and a myriad of others uses, increases the value of this wonderful commodity. Go into the process planning on a premium product and make your facility development choices based on this philosophy and the program is much more likely to succeed and be sustainable.

Jd-I agree— the goal should be to develop a high quality product with identified end markets. The rationale for the pricing structure of 50% at \$20/CY and 50% at \$7.50 sets very conservative goals during the learning curve.

Need to Reach Recycling Goals-Schools & Residents

I don't agree with the report's premise that more recyclables cannot be pulled from schools and residences. I recommend the county provide small educational grants to municipalities and homeowners associations to conduct educational programs in their communities; and that the leadership of the school system meet with county leadership to discuss how to provide better incentives for individual schools to recycle. Some do well, some do not. Below are photos taken the first week of April at Middletown High School and Elementary, Frederick High and West Frederick Middle. I knew from observing my children in school that recycling is uneven from school to school, and my few visits to the schools confirmed it. A random waste sort of each feeder pattern should be conducted....there IS more material to be gained to meet MRA goals.

Jd-I agree that more can be done. We'll consider including in “additional recommendations” from the committee.

All in all, I am very pleased with the direction in which the county is headed. I urge you to work closely with the private sector, farmers, towns, HOAS and non profits in partnership to develop all aspects of our recovery of our resources. A position focusing on partnerships run through either the Sustainability Office or Office of Recycling could make this happen, as well as increased education, oversight of grant programs so these communities can make their own success happen.

Jd-Good idea

I also urge you also to think outside the box when it comes to MRA recycling rates. There are winds of change blowing in many states that are causing this industry to look at OVERALL LIFECYCLE environmental costs of products and processes. For example, while C & D waste does not help MRA numbers, it is a major trend nationwide because it is a) bringing jobs and business to localities; and b) recovering large amounts of material for valuable new use. While it is not yet happening in Maryland, the trend in many states is to look at resilience and overall environment benefits—which sometimes make items that are traditionally popular to recycle, actually costly to our environment. Please have your solid waste and sustainability staff join some of these national webinars, conferences and other learning opportunities so they will be ahead of the curve when the winds of change come to Maryland!

Recommendations:

- 1) Text Change to Phase 2 Report. None
- 2) Consider recommendations in implementation phase.

Comment 4

Monday, April 24, 2017

Subject: Phase 2 Report

One important point for consideration with respect to the Final Report. While “SSO” is repeatedly used as short-hand jargon for Source Separated Organics, it may be worth knowing that another widespread use within the wastewater industry and as a regulatory definition (MDE) of SSO is a Sanitary Sewer Overflow. I would strongly suggest using another, different term, e.g., Source Separate Organic Materials (SSOM), or something else, to clearly differentiate between the terms.

Otherwise, continued interchangeable use of SSO may cause confusion between these terms, and it is very important to educate and avoid confusion early on, particularly if a long-term program and effort is ultimately considered for approval. Moreover, realizing that the jargon of “SSO” has multiple meanings (see an example of a list in the link: <http://acronyms.thefreedictionary.com/SSO>), it is worth noting that if solid waste management industry terminology does not make the top 10 in a list, why not simply think locally about avoiding confusion when there was the opportunity?

SSO is a standard acronym in the field of organics collection. The term SSO is defined on pg. 1 of the Executive Summary, again under “Abbreviations and Acronyms” pg. 9, in the first paragraph of Section 2 and numerous other places throughout the report. Considering it is an accepted term in the field and well defined in the Phase 2 Report.

Recommendations:

1) Text Change to Phase 2 Report None

Comment 5

Tuesday, April 25, 2017

Subject: Comments on Phase 2

The What's Next process has set a goal for Frederick County of removing 40,000 tons/year from our current 137,000 going to landfills. This goal is to be achieved mostly by removing food waste from the waste stream, composting and using it locally. Increasing our recycling will also work towards the goal.

[jd-Agree](#)

However, the Phase 2 report does not properly address the importance of the involvement of the Frederick County Public School (FCPS) in achieving the goal. In the first place the report repeats the invalid assumption from Phase 1 "...that FCPS already had functioning single-stream... recycling programs in place such that no meaningful additional quantities of clean recyclables could be recovered." (pg 33) "Most aspects of the PSRP (Public Schools Recycling Program) have already been adopted by the Board of Education (BOE) and individual schools." (pg 32). There has been no data provided to support this assumption and anecdotal stories appear to contradict it.

The report does present research showing how recycling programs can be cost-effective and even lower costs in other schools (pg 33-34), but it appears that FCPS system is not taking advantage of that fact.

Getting FCPS more involved is very important to achieving the 40,000 tons/year goal. Students who are currently in FCPS will have households of their own within the time horizon of this plan. It is essential that those students be educated so that strong recycling and food separation become a regular way of life for them as they graduate to the adult world.

The Frederick County BOE needs to understand and promote the educational aspect of this change and the FCPS system and 50+ individual schools need to implement it with changes in procedures and enthusiasm.

The Plan to develop ten or twelve small-scale composting programs around the County is great. The focus on large producers of food waste to begin the program is the way to go. However, as we consider getting

into residential collections of food waste, some effort must be made to involve local trash haulers. It should be noted that as food waste is separated from other waste and recycling is increased, the need for weekly trash collection will diminish which could result in a saving for municipalities, multi-family dwellings (MFDs) and single households. As trash collections go to every other week (or even monthly) there will be an additional incentive for households to separate food waste from trash -- particularly during the summer.

The Phase 2 rejection of a Resource Recovery Park (RRP) is a good decision. Unfortunately, the discussion was marred by a lack of clarity of the meaning of an RRP. The Report equates an RRP with a mixed-waste sorting operation (see pg. 47 top). That is not what was being promoted during the Phase 1 public input. It doesn't matter at this point since the plan has been rejected, but it would be good to clarify in the Phase 2 report that the analysis was being done on a concept that was not the one suggested during the public input.

Jd-The Resource Recovery Park, as defined by Geosyntec (Phase 1 Appendix D), was accepted and approved by the SWSC. Phase 1 is complete and changing the evaluation criteria or definition in Phase 2 would create inconsistency and confusion.

Recommendations:

- 1) Text change to Phase 2 Report as it pertains to organics and recycling. None

The Phase 2 recommendation from Geosyntec is to implement organics recovery at public schools. I suspect the committee will support this recommendation. We can consider including in "additional recommendations" improving recycling, concurrent with organics diversion.

- 2) Text change to Phase 2 as it pertains to Resource Recovery Park. None

Making a text change in Phase 2 to fit some other description/definition of a RRP would make the report inconsistent with Phase 1.

Comment 6

April 24, 2017

Subj: Review Comments as pertain to the referenced Phase 2 Report

Ref: Phase 2 Report - Solid Waste Management Option Study, dated 3 March 2017

The following is a set of comments and inquiries which resulted from a review of the referenced Phase 2 document. Said comments and inquiries were introduced at the "What's Next" public hearing on 20 Apr 2017 at Winchester Hall.

1. The report successfully addresses-identifies concepts for consideration, but fails to prescribe:
 - a. methods, approaches, training, and costs for program implementation,
jd-The information in Phase 1 and Phase 2 provides sufficient information to make a recommendation. That being said before any option or program is implemented due diligence is recommended.
 - b. Zero Waste concept training for the County-wide residential community, embedded municipality officials, and responsible County, and municipality solid waste staff and waste haulers,
jd-This is not a part of the RFP or the proposal. Additional the County Executive did not task the committee with this.
 - c. does not incorporate Zero Waste "subject matter experts" [as originally advertised] in the development of said report - see Phase 2 Report acknowledgments
jd-I am not sure what is being communicated. Geosyntec was hired based on their proposal to a county Request for Proposal. Zero Waste "subject matter experts" was not part of the proposal.
2. On the Phase 2 Report Page 6, last paragraph entitled "Recommendation:" The Phase 2 Report Fails to properly develop and present the successful attributes and programs pertaining to a Resource Recovery Park. Stated information is incomplete and confusing as to what are the actual plans for Resource Recovery Park consideration and implementation.
Jd-Page 6 is the Executive Summary. The Resource Recovery Park, as defined by Geosyntec (Phase 1 Appendix D), was accepted and approved by the SWSC.
3. A "lessons learned" report will be issued by Montgomery County regarding the Dickerson Resource Recovery Facility [RRF] incinerator waste input pit fire. Said "lessons learned" report denotes "accident analysis" considerations.

In a recent What's Next meeting, it was implied that Frederick County had fire experience, and does not need the "lessons learned." Items of concern and interest are:

- a. solid waste receiving pile enhanced fire detection systems
- b. solid waste receiving pile special fire suppression systems
- c. fire suppression water retention pond contamination monitoring-analysis
- d. ambient air fire effluent monitoring for toxic and carcinogenic effluents - equivalent to incinerator effluents under emissions clean-up equipment failure mode.
- e. regional emergency management evacuation plans and procedures akin to those in-place for the Dickerson RRF, Frederick County does not have said EM evacuation plans and procedures in-place. These evacuation plans are a must if a RRF is located at McKinney Park [or equivalent] in which there is a high density of schools and residents within the area, such as three miles.

Montgomery County to issue their “lessons learned” report on or about 1 May 2017
[Jd-Nice to know information but not relevant to this study.](#)

4. A comprehensive “Zero Waste” concept and implementation training seminar is required for all who are listed herein under Item-1.b.

[jd-Opinion](#)

5. With the referenced Phase 2 report issued, what are the next steps in program development and implementation?

[Jd-Phase 2 is a “Draft Document”. The committee will reconcile and include in the draft relevant comments/suggestions received in the 45 day review/comment period. The Phase 2 Report will then be presented to the County Council on June 27th. If the council has comments to include we will include those before we send the final Phase 2 document to the County Executive.](#)

Comment 7

Frederick Zero Waste Alliance

April 25, 2017

Dear What’s Next Solid Waste Steering Committee members:

Frederick County is currently sending 137,000 tons of waste to landfills every year. We endorse the What’s Next? Interim goal of reducing that amount by 40,000 tons by 2025. We further endorse the plan to achieve that reduction through separation and composting of organic matter and through increased recycling. After reviewing the Phase II report, we offer the following comments:

1) The Phase II report recommends a consultant be hired to provide education and outreach (p. 19). This is necessary to assure the behavior changes that will be needed on the part of citizens, so we would like to specifically endorse this recommendation.

[Jd-Concur](#)

2) There is much work to be done within the Frederick County Public School (FCPS) system. We do not agree with the assumption on page 33 that “...FCPS already had

functioning single stream...recycling programs in place such that no meaningful additional quantities of clean recyclables could be recovered.” At the forums, we heard from parents, teachers, and students that more can be done in our schools to improve the capture of recyclables.

[jd-See recommendations at end of comment.](#)

Students in school today will be householders within the time frame of this report’s recommendations, and the behavior of those students can be shaped now for increased recycling and separating of organics. FZWA recommends hiring an employee or consultant to gain the cooperation of the Board of Education, FCPS leadership, and schools throughout the county to successfully implement both organics and recyclables diversion throughout the school system.

[Jd-Same as Item 2 above](#)

3) The Phase I report included a list of the most important waste/materials management options (to citizens), developed from the workshops held throughout the county. Some of these include:

- a. Solid waste management should include recycling, composting, reuse, and source reduction.
- b. Targeted, comprehensive education is important.
- c. The county should incentivize participation by schools and businesses.
- d. The county should expand waste management services to schools and businesses, especially recyclable collection at commercial buildings (Phase I, page 23) The Phase II report acknowledges that the 40,000 ton goal cannot be reached by community composting alone. The report indicates that other initiatives will be needed to reach, and ultimately exceed, this goal. In the view of FZWA, those initiatives can be found within the concepts of zero waste practice.

[The Frederick Zero Waste Alliance represents citizens in Frederick County whose goal is to reduce our community’s solid waste to a minimum, using environmentally and economically sustainable methods.](#)

All of the items mentioned above (1–3, a–d) fall under the domain of zero waste initiatives. It will be highly desirable that employees (or consultants) that are hired to implement Phase II have a background and experience in implementing successful zero waste operations in other communities. This will be critical to the success of community composting, increased recycling, as well as achievement of all issues listed above. FZWA also recognizes that finances will play a significant role in what is accomplished in this initiative. The Phase II report, at times, suggests cost estimates that may be excessive (for examples: cost of trucks for waste collection (p. 72), or cost of 32 gallon green bins for each household (p. 69) — do households with minimal to no yard waste need or want 32 gallon bins?). Those who are experienced in designing and implementing zero waste programs in communities will also be knowledgeable regarding how to accomplish these tasks in the most cost effective way — another reason we hope the County will hire a consultant or employee in Phase III with zero waste knowledge and experience. All of the issues identified above lead to the overall recommendation by FZWA that the most crucial action the

County can take to ensure success with the next steps in our materials management process is to employ or contract with highly experienced zero waste experts who can work with our County to achieve our goals.

Thank you for considering our comments.

Jd-Considered. See recommendations at end of comment. Nothing is being implemented at this time. The committee will endorse the Phase 2 recommendations, possible with slight text amendments; however, the comments above (3, b & c) are beyond the scope of this report.

Recommendations:

- 1) Text change to Phase 2 Report. None
- 2) As it relates to hiring a consultant. We can consider endorsing the suggestion by Geosyntec (pg 19) to hire a consultant to work with staff on education and public outreach; however, I would not recommend restricting a "Request for Proposal" for such a position to a "zero waste consultant".
- 3) We can consider including in "additional recommendations" improving recycling, concurrent with organics diversion

Comment 7-1

Wednesday, April 26, 2017

To: whatsnext

Subject: FZWA agreement

I would like to add my name to those who agree with zero waste in Frederick County, and the need to hire someone who has been successful at accomplishing similar goals elsewhere. Zero waste goals are critical for reaching liveable, sustainable communities.

Comment 7-2

Wednesday, April 26, 2017

To: whatsnext

Subject: Comments on Phase 2 report

I agree with the comments sent by the FZWA

Comment 7-3

Wednesday, April 26, 2017

To: whatsnext

Subject: Comments on Phase 2 report

Hello, I am writing in support of FZWA comments. I would very much like to see a more robust recycling and composting program in Frederick County. It should be as easy to recycle or composting as it is to throw something into the trash. Actually, easier

Comment 7-4

Thursday, April 27, 2017

To: whatsnext

Subject: Comments on Phase 2 report

Hello

I concur with the comments made by FZWA.

Thanks for your efforts!

Comment 7-5

Friday, April 28, 2017

To: whatsnext

Subject: Solid Waste Plan

I agree with the comments submitted by FZWA."

Comment 7-6

Sunday, April 30, 2017

To: whatsnext

Subject: "I agree with the comments submitted by FZWA."

"I agree with the comments submitted by FZWA."

Comment 7-7

Monday, April 24, 2017

To: whatsnext

Subject: Phase 2 Report/Comments

Hello,

I fully support the comments submitted on Phase 2 by the Frederick Zero Waste Alliance. The need for an experienced Zero Waste consultant, who has successfully implemented zero waste in other communities, is crucial for the future success of this project. I also urge the county government go outside of the NMWDA to accomplish this task. My understanding is the What's Next steering committee had three consultants to choose from, all via NMWDA. It is evident the consultants tasked with the current project were inexperienced with zero waste; which made it difficult for them to provide the county with information in many areas that were identified as important for the counties waste plan. Hopefully as we move into implementation, we will have someone in a leadership position who is fully knowledgeable on zero waste with proven experience in this area.

[Jd-See response to comment 7](#)

Comment 8

Thursday, April 27, 2017

To: whatsnext

Subject: More action on the part Of Frederick County Government Needed

Frederick County Government needs to do more to educate and encourage residents to recycle. Generally, if people understand the "why's" they are willing to co-operate. I endorse the Zero Waste Alliance's views.

One suggestion I do have is if my reading of reports is true and if trying to recycle glass is "poisoning" the rest of the recyclables stream, then residents should be provided with a separate container for glass. Simple and I am sure most residents would be happy to comply.

[Jd-Recommendation:](#)

- 1) [Text change to Phase 2. None](#)

Comment 9

Thursday, April 27, 2017

To: whatsnext

Subject: Comments on Phase 2 Report

Hello,

I just read the FZWA comments and would like to add a few thoughts. Increased recycling and the removal of organics is mentioned as a basic goal. I want to expand on this to point out that diversion of material from the waste stream is also a useful approach which would be looked at by a zero waste consultant. Items are in much better condition for reuse/repair if they can be obtained prior to being placed into

the type of waste stream we currently have.

The removal of organics, which is suggested in Phase 2, will result in cleaner waste which will also allow more materials to be recovered for other purposes.

I fully support comments made by the Frederick Zero Waste Alliance.
[Jd-See recommendations comment 7.](#)

Comment 10

Wednesday, April 26, 2017

To: whatsnext

Subject: Comments on Phase 2 report

The presentation at Winchester Hall last Thursday was insightful and educational. Thank you for the willingness to dialogue with members of the audience.

I think that moving cautiously and slowly forward with the yard waste satellite collections is a very good small step. And forward-moving little steps are good.

I also think that more can be done with collection and education in the schools. Also, I exercise at the Feagaville (Ballinger) Center. There are no recycle bins and no effort to recycle there. I know that Jefferson does recycle, but probably because some of their Raritan members see to it that there are adequate recycle bins, and that someone is responsible for taking them to the drop off. Much more can be done with community centers and churches to encourage recycling.

Every day I am thankful that we have moved away from Waste to Energy. I want to take this opportunity to thank those who stood fast against this, and those who changed their minds to become against it.

We are moving in the right direction. Thank you

[Jd- Recommendation:](#)

1. [Text change to Phase 2. None](#)
2. [We can consider including in "additional recommendations" improving recycling in schools concurrent with organics diversion.](#)

Comment 11

Thursday, April 27, 2017

To: whatsnext

Subject: Comments on Phase 2 report

If you want to accomplish your goal, Frederick County will need to implement a Pay as You Throw program to incentivize source separation. Carroll County is planning to start a pilot PAYT program in the near future. I will let you know how that progresses.

Frederick County's existing model for collecting recycle is flawed because the County pays a separate hauler to pick up recycle. Frederick County should adopt the same model as Carroll County where local haulers are required to pick up trash AND recycle in order to obtain a permit. If you do that, you will eliminate the contract and cash outlay for collecting recycle.

Jd-Recommendations:

- 1) [Text amendment to Phase 2 Report. None](#)

Comment 12

Thursday, April 27, 2017

To: whatsnext

Subject: Comments on Phase 2 report

Good. How about adding a complete ban on non recyclable plastics & styrofoam in Frederick County?

Jd-Recommendations:

- 1) [Text amendment to Phase 2 Report. None](#)

Comment 13

Sent: Thursday, April 27, 2017

To: whatsnext

Subject: Comments on Phase 2 report

Following are my comments and recommendations on the Phase 2 report; In addition to the comments provided by the Zero Waste Alliance which I do agree with as far as they go I would like to offer these additions.

1. Rather than a consultant hire, which most often brings high overhead, I suggest hiring a contract employee to be interviewed and recommended for hire by the Steering Committee to assure the hired employee has the qualifications that meet the objectives of Whats Next?

[Jd-Interesting approach](#)

2. I believe the initial pursuit of the compost volume is smart and also believe it can be accomplished in less than 8 years.

[Jd-The phasing is probably on the ultra conservative side.](#)

3. I recommend that C and D material which may be the next single largest volume left to be removed from landfilling should be attacked simultaneously, irrespective of the fact that it doesn't "count" when one looks solely at State recycle objectives, it surely counts when it is being hauled to PA and VA @ \$60 + per ton and elimination of this waste could pay for many contract hires and or full time county employees.

[Jd-We can consider including C&D in "Additional Recommendations".](#)

4. I recommend that the county in concert with the Steering Committee look to gather volunteers to assist in the process of getting these issues off the ground and I am putting my hand up as one of what I believe will be many who will offer their time, energy and knowledge for this effort.

5. Finally I disagree strongly with the definition / description of Resource Recovery Park (RRP) as provided by GEO. which appears to have little to NO experience in this concept as envisioned by the Frederick Zero Waste Alliance nor as practiced by active RRP's across this country.

[Jd-Recommendations:](#)

1) [Text amendment to Phase 2 Report. None](#)

Comment 14

Smarter Growth Alliance for Frederick Count

April 27, 2017

The Honorable Jan Gardner

What's Next Solid Waste Steering Committee

Re: What's Next, Phase 2 Report

Dear County Executive Gardner and Steering Committee, The Smarter Growth Alliance for Frederick County is a coalition of local and state citizen-based organizations representing approximately 16,000 members and supporters in Frederick County. We are working to engage residents and policy makers in support of wise land use that values our rural landscapes, protects our natural resources, and builds on the unique character of our towns and cities to ensure a more resilient and prosperous future. We appreciate the opportunity to comment on the Phase 2 Report of the Solid Waste Management Options Study. We strongly support the community composting recommendation and the acknowledgement that other zero waste initiatives will be needed to reach the goal of diverting 40,000 tons from the waste stream in Frederick County. In order to meet the diversion goal, we strongly recommend that the county employ a consultant that has successfully implemented zero waste strategies in other communities. An experienced consultant will be able to support the county staff in accomplishing a variety of recommendations in the Phase 2 report including:

1. Providing education and outreach in order for citizens and organizations to understand why they are being asked to modify behavior and make changes to existing systems.
2. Assisting with implementation of a three-bin system and associated programs that incentivize behavior change with critical partners, such as Frederick County Public Schools.
3. Modifying county ordinances to support collection and composting of organics which may include changes to zoning and building codes, as well as various policies and procedures.
4. Leveraging existing resources, like the Maryland Small Business Development Center programs, to support the creation and growth of businesses engaged in composting and other zero waste initiatives.

In addition to the aforementioned recommendations, expanding recycling to include businesses was repeatedly identified by the public as critical to meeting the 40,000-ton diversion goal during the Phase 1 community meetings. Based on what has been achieved in other communities, expansion to businesses could dramatically move the county toward the diversion goal and perhaps beyond it. While not addressed in the Phase 2 report, expanding recycling to businesses could be evaluated by a zero waste consultant along with incentives for businesses to engage in zero waste programs.

In closing, we believe the most important decision Frederick County can make in conjunction with this effort is to work with an experienced zero waste consultant. This will make the greatest contribution to a successful and effective program.

Thank you for your consideration.
Sincerely,

[Jd-Recommendations:](#)

1. [Text change to Phase 2 Report. None](#)
2. [As it relates to hiring a consultant see comment 7 recommendation 2](#)

Comment 15

April 26, 2017

Comments on the Phase 2 Report

Overall, I'm pleased with the recommendations in the Phase 2 Report. It is no small thing to divert 40,000 tons of material away from landfilling, and setting up a set of systems and programs to do this through diversion of organic material is a great way to accomplish the goal.

I have a few comments on a couple of areas in the report.

Use of the term "RRP" in the report. The What's Next Committee has discussed many times the problem of using the term "Resource Recovery Park," because it means many things to different people and professionals. There were a lot of citizens who asked in our forums that a RRP be studied for inclusion in a future materials management system in Frederick County, but they had in mind facilities or systems like those found in Boulder CO, Berkeley CA (Urban Ore), or Austin TX (Recycle and Reuse Drop-Off Center). These vary in size and materials managed by quite a bit. Our own landfill offers drop off facilities that represent some of the component parts of a traditional RRP. But the RRP discussed in the Phase 2 report is unlike the RRP's favored by citizens at our forums, and it would help to choose a different name for the type of facility discussed in the report. I've had two citizens approach me, upset that RRP's have been rejected by Geosyntec, but they hadn't fully read how the RRP is defined within the report.

[Jd-See RRP Comment 5](#)

I'd have to disagree with the report's statements about recycling in our school system. Based on the comments we received in the forums from teachers, students and parents, the recycling programs in our schools are inconsistent and in some cases, non-existent. I very much hope we will educate those in the school system about recycling while they are being educated about composting. We should take advantage of the opportunity, while in the schools working with children and staff, to set up the best systems for both recycling and composting, and educate everyone about the values of both, simultaneously.

Food diversion hierarchy. I hope as the County fleshes out the composting program, there will be consideration of implementing still-edible food collection and diversion, before organics are collected for composting. I hope we keep in mind the "highest and best use" hierarchies as we plan.

Construction and demolition materials. I was glad we/the consultant took C&D debris into consideration for study in this report, despite the fact that it isn't considered in the MRA calculations for waste diversion and recycling. However, it was considered only as part of the RRP, and when the RRP went by the wayside as a non-recommended management system, we lost the capture of C&D as material for further study and consideration. I hope the County will look at how a C&D reuse/recycling program might be implemented to divert as much of that material from landfill as possible.

Jd- Recommendations:

1. Text change to Phase 2. None
2. We can consider including in "additional recommendations" improving recycling in schools concurrent with organics diversion.
3. We can consider including in "additional recommendations" Explore options for C&D recycling and recovery.

Comment 16

April 19, 2017

Dear What's Next Solid Waste Steering Committee:

Thank you for the opportunity to comment on the Solid Waste Management Options Study Phase 2 Report for Frederick County.

We applaud the general direction of this effort, and seek to strengthen the recommendations to the county through the attached comments and information that we hope will inform your process as we move Maryland communities away from incineration and landfilling toward Zero Waste goals.

Please find our comments attached.

Sincerely,

Mike Ewall, Esq.

Founder & Director Energy Justice Network 215-436-9511 mike@energyjustice.net

Comments are extensive. Please see attachment.

Jd-These comments are informative and some could be considered during implementation; however, I see no recommendations that would require text changes to the Phase 2 Report. I did see where he supports mixed waste processing, when it is not used to replace SS recycling 😊

Recommendations;

1. Text change to Phase 2 Report. None
2. Consider reviewing during implementation