

**2005
ERIE COUNTY
MUNICIPAL SOLID WASTE MANAGEMENT
PLAN**

**PREPARED IN ACCORDANCE WITH
THE PENNSYLVANIA MUNICIPAL WASTE PLANNING,
RECYCLING AND WASTE REDUCTION ACT,
ACT 101 OF 1988**

**Adopted by the County of Erie: _____
Ratified by the Municipalities of Erie County: _____
Approved by the Pennsylvania DEP: _____**

**The preparation of this Plan was financed
by an Act 101 Section 901 Planning Grant from
the Pennsylvania Department of Environmental Protection
and by the County of Erie, Pennsylvania**

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EXHIBITS

- Exhibit 1 - 2005 Map of Erie County Municipalities
- Exhibit 2 - Erie County Municipalities Population, 1950-2000
- Exhibit 3 - Erie County Demographics
- Exhibit 4 - Erie County Potential Medical & Chemotherapeutic Waste Generators
- Exhibit 5 - Public Sewer Access
- Exhibit 6 - Erie County Sewage Treatment Sites
- Exhibit 7 - Erie County Septage Haulers

- Exhibit 8 - Erie County Beneficial Use of Sewage Sludge Authorizations
- Exhibit 9 - Location of Landfills
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- Exhibit 12 - Map of Erie County Recycling Programs
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- Exhibit 14 - June 4, 2003 Memorandum from County Executive
- Exhibit 15 - February 17, 2005 Letter from PADEP
- Exhibit 16 - County of Erie, Pennsylvania Request for Proposals
for Reservation of Capacity Agreements Relating to
Disposal or Processing of Municipal Solid Waste
- Exhibit 17 -Newspaper Publication Notices
- Exhibit 18 - Notice Regarding Erie County Pennsylvania
Municipal Solid Waste Management Plan
Request for Proposals
- Exhibit 19 - January 5, 2005 Proposal Opening Minutes
- Exhibit 20 - County of Erie, Pennsylvania Draft Agreement Form for
Reservation of Waste Disposal Capacity Agreement
- Exhibit 21 - Ordinance Number 96, 1995
- Exhibit 22 - Plan Implementation Documents (to be added later)
- Exhibit 23 - 2003/2004 Erie County Municipal Solid Waste
Management Plan Notification List
- Exhibit 24 - Erie County Council Resolution Number 43, 2003
- Exhibit 25 - Erie County Municipal Solid Waste Advisory Committee
- Exhibit 26 - Act 101 Advisory Committee Meeting Agendas and Minutes
- Exhibit 27 - Public Hearing Transcript
- Exhibit 28 - Public Written Comments and Comment/Response Document

INTRODUCTION

A. PLAN REQUIREMENT

Act 101, the Municipal Waste Planning, Recycling and Waste Reduction Act of 1988, requires that each county develop and submit an officially adopted Municipal Waste Management Plan for municipal waste generated within the county. In accordance with the requirements of Act 101 and its implementing regulations, Erie County previously developed and adopted Municipal Waste Management Plans in 1990 and 1995. Plans are required to be updated every ten years. This Plan is an update to the 1995 Plan.

The purpose of the Plan as stated in Act 101 is to (1) ensure that the County has sufficient processing and disposal capacity for its municipal waste for the next ten years, (2) ensure a full, fair and open discussion of alternative methods of municipal waste processing or disposal, (3) ensure maximum feasible waste reduction of municipal waste or source separated recyclable material, (4) shift the primary responsibility for developing and implementing municipal waste management plans from municipalities to counties, and (5) conserve resources and protect the public health, safety and welfare from the short and long term dangers of transportation, processing, treatment, storage and disposal of municipal waste. Plan requirements are outlined under Act 101 and the Department of Environmental Protection (DEP) regulations. In addition, this Plan has been developed following the DEP's guidance documents.

B. ACKNOWLEDGMENTS

The County wishes to acknowledge receipt of a municipal waste planning grant from the DEP that funded a portion of the cost of the development of the Plan. In addition, the County wishes to acknowledge and thank the following for their efforts and support during the development of the Plan: the County Executive, Rick Schenker; members of Erie County Council - Joy Greco, Joseph Giles, Fiore Leone, Mark DiVecchio, Kyle Foust, David Mitchell and Carol Loll; the Act 101 Advisory Committee; the Erie County Department of Economic Development and Planning Director, Janet Anderson, and her staff.

CHAPTER 1: DESCRIPTION OF WASTE

A. INTRODUCTION

Municipal waste is defined in Act 101 as follows:

Any garbage, refuse, industrial lunchroom or office waste and other material including solid, liquid, semisolid or contained gaseous material, resulting from operation of residential, municipal, commercial or institutional establishments and from community activities and any sludge not meeting the definition of residual or hazardous waste in the Solid Waste Management Act from a municipal, commercial or institutional water supply treatment plant, wastewater treatment plant or air pollution control facility. The term does not include source-separated recyclable materials.

This Chapter addresses the origin, content, and weight or volume of the municipal waste currently generated within Erie County's boundaries, and estimates the amount of municipal waste that will be generated during the next ten (10) years in the County. General municipal solid waste is described below, as well as certain special handling wastes such as sewage sludge (including septage), infectious and chemotherapeutic waste, ash from resource recovery facilities or incinerators, and other municipal-like waste such as construction/demolition waste.

In addition, recycling efforts and recyclables are addressed in this Chapter (as well as in Chapters 4 and 5 below), since the content and weight or volume of Erie County's present and future municipal waste stream is impacted by the amount of recyclables in the waste stream and the level of success achieved in separating and marketing such recyclables.

The geographical area for which this Plan is prepared is all of the area within the boundaries of Erie County, Pennsylvania. A map showing the exact geographical area covered by this Plan is shown in Exhibit 1.

B. MUNICIPAL SOLID WASTE IN ERIE COUNTY: ORIGIN, CONTENT, AND WEIGHT OR VOLUME

1. General Municipal Waste

General Municipal Waste in Erie County is generated by individual residents, businesses, educational institutions, and other miscellaneous generators. Information regarding residential population, business, institutions, and educational facilities in Erie County are set forth in Exhibit 2. Past Erie County Municipal Solid Waste Management Plans evaluated a number of different methods for estimating the volume of municipal waste generated in Erie County (See 1995 Plan, Chapter 1). It was determined under the prior planning efforts that the best method for estimating future municipal waste volume was projections based on actual historical waste

generation and disposal data for Erie County. Figures for the past nine years are shown in the following table.

Table 1-1

ERIE COUNTY MUNICIPAL WASTE TOTALS
TONS/YEAR

<u>Year</u>	<u>Disposal</u>	<u>Recycling</u>	<u>Total Waste Generation</u>
1996	185,500	56,965	242,465
1997	180,100	47,768	227,868
1998	180,500	55,444	235,944
1999	188,000	54,605	242,605
2000	197,300	53,531	250,831
2001	200,800	57,882	258,682
2002	205,200	66,455	271,655
2003	208,200	73,959	282,159
2004	215,900	90,622	306,522

Municipal waste disposal in Erie County has increased by 30,400 tons/year from 1996 to 2004, despite an increase in the amount of recycling. The 2004 disposal total represents an increase of 16.4% from the 1996 figures. This increase appears to reflect an increase in the average waste generation per person since overall Erie's population has remained relatively steady during this time period. (See Exhibits 2 and 3.)

2. Infectious and Chemotherapeutic Waste

Pursuant to DEP regulations, infectious and chemotherapeutic waste is classified as municipal waste. Infectious waste generally includes waste materials generated in the diagnosis, treatment, immunization, autopsy, preparation for cremation or interment of humans or animals including waste blood, tissues, organs, body parts, gauzes, clothing, sharps, etc. Chemotherapeutic waste is waste resulting from the production or use of antineoplastic agents used for the purpose of inhibiting or stopping the growth of malignant cells or killing malignant cells. These types of wastes are common to all types of hospitals, nursing homes, clinics, doctors, dentists, veterinaries, and funeral parlors. Potential generators of chemotherapeutic and infectious waste located in Erie County are identified in Exhibit 4.

Available DEP Municipal Waste Records indicate that none of Erie County's infectious and chemotherapeutic waste is disposed of in waste disposal facilities located in Erie County. Available information is that a portion of the infectious/chemotherapeutic waste is disposed of in a permitted captive waste incinerator at Hamot Medical Center and the remaining waste is collected by permitted waste transporters for shipment and out-of-state disposal.

3. Sewage Sludge and Septage

Sewage sludge, also known as biosolids, is liquid or solid sludges and other residues from municipal sewage treatment plants and septic and holding tanks pumpings from commercial, industrial and residential establishments. A list of potential generators of sewage sludge and pumpers/haulers of septic and holding tanks in Erie County are located at Exhibits 5, 6 and 7.

Sewage sludge generated in Erie County is currently disposed of either by landfilling, land application, or incineration. The quantity of sewage sludge landfilled from Erie County generators for the last five years from which figures are available is shown in the following table:

Table 1-2

ERIE COUNTY SEWAGE SLUDGE DISPOSAL IN LANDFILLS
TONS/YEAR

<u>Year</u>	<u>Amount</u>
1999	12,304
2000	13,641
2001	12,085
2002	7,728
2003	9,274

Land application of biosolids is regulated by the DEP. In order to land apply biosolids, the party must hold a DEP permit. Currently, 8 facilities in Erie County hold a DEP permit for land application of sewage sludge. (See Exhibit 8.) One of the permittees, Washington Township, land applied a total of 116 wet tons of sewage sludge in 2004. The other permit holders have not land applied sewage sludge in recent years.

The City of Erie incinerates its sewage sludge at a permitted incinerator located at the City of Erie Wastewater Treatment Plant. In 2004, the incinerator handled 5,161.2 dry tons of sewage sludge. Ash from the incinerator is disposed of at landfills, principally Carbon Limestone Landfill in Ohio and Lakeview Landfill in Erie.

4. Ash From Resource Recovery Facilities

There are no resource recovery facilities located in Erie County as that term is defined in the municipal waste regulations.

5. Construction and Demolition Waste

Construction and demolition waste ("C&D waste") in Erie County includes solid waste resulting from the demolition and renovation of various structures and includes wood, plastic, metal, concrete, and other materials. Because of the nature of this waste, the amount generated fluctuates based on the building/remodeling activity in the County. Disposal of the C&D waste generated in Erie County in the past five years based on DEP data is shown in the following table:

Table 1-3

ERIE COUNTY C&D WASTE DISPOSAL
TONS/YEAR

<u>Year</u>	<u>Amount</u>
1999	70,399
2000	45,977
2001	52,079
2002	35,274
2003	33,215

These numbers only reflect disposal at in-state landfills and the County does not have any information on how much, if any, C&D waste is sent to out-of-state landfills. Some of the apparent drop from 1999 to 2003 may be due to the waste material being sent out-of-state as fees in Pennsylvania increased over that time period. Neither the Commonwealth nor Erie County track the amount of C&D waste that is recycled on an annual basis. Based on anecdotal evidence, the amount of C&D waste recycled in the County is believed to be insignificant.

C. EFFECT OF ERIE COUNTY RECYCLING

In Erie County, the recycling program is a mix of private and public activities. Recycling in Erie County makes a significant contribution to the reduction in the amount of municipal waste that must be disposed of in landfills. Based on the data from 2004, approximately 90,622 tons/year of municipal waste is recycled. This represents 29.5% of the total municipal waste generated in Erie County. These recycling efforts represent an increase in the actual tons recycled as well as the percent of municipal waste recycled over earlier years. The upward trend in recycling is somewhat offset by a similar but smaller upward trend in the amount of waste generated on an annual basis. Overall, recycling rates in Erie County should continue to improve and hold down the overall need for disposal capacity in Erie County.

CHAPTER 2: DESCRIPTION OF FACILITIES

A. CURRENT AND PROPOSED FACILITIES

This section describes the facilities currently disposing or processing Erie County municipal solid waste. Based on available records, Erie County municipal solid waste was disposed of in one of the following facilities in 2003/2004:

- Lakeview Landfill - Erie County, Pennsylvania
- Carbon Limestone Landfill - Mahoning County, Ohio
- Chautauqua County Landfill - Chautauqua County, New York
- County Landfill - Clarion County, Pennsylvania
- Seneca Landfill - Butler County, Pennsylvania

Each of these facilities has indicated an interest in being part of the 2005 Municipal Solid Waste Plan Update as a designated facility. A review of the status of each of the facilities that are currently receiving municipal solid waste from Erie County as well as additional facilities that have expressed an interest in being part of the new Plan (see Exhibit 9 for locations) are as follows:

1. Lakeview Landfill - Erie County, Pennsylvania

Lakeview Landfill is located at 851 Robison Road in Summit Township, Erie County. The facility is owned and operated by Waste Management of Pennsylvania pursuant to Pennsylvania Solid Waste Permit No. 100329. As the only permitted solid waste landfill in Erie County, it continues to receive the bulk of Erie County's municipal solid waste. In the period of 2000 through 2004, on average, it received 90% of the municipal solid waste generated in Erie County. Lakeview Landfill's current permit expires on April 3, 2010. Lakeview has an average daily volume under its DEP permit of 4,600 tons and a maximum daily volume of 5,000 tons. Lakeview Landfill has approximately 4.5 years of remaining permitted capacity. It is currently designing a proposed expansion that will allow for approximately 20 years of permitted waste disposal capacity. In 2004, Lakeview Landfill received 185,505 tons of municipal waste from Erie County. In response to Erie County's Request for Proposals for Reservation of Disposal Capacity, Lakeview Landfill stated that it would provide 250,000 tons per year of reserved disposal capacity for Erie County municipal solid waste.

2. Carbon Limestone Landfill - Lowellville, Mahoning County, Ohio

Carbon Limestone Landfill is located at 8100 South Stateline Road, Lowellville, Ohio. Carbon Limestone Landfill is owned by BFI of Ohio Industries, Inc. and operates pursuant to Ohio EPA Solid Waste Facility License No. 50-00-04. The Ohio EPA license expires December 31, 2005. Consistent with Ohio regulations, facility licenses are only issued for a one-year period. Carbon Limestone Landfill has operated for a number of years in this location and anticipates that it will continue to receive one-year permits issued by the Ohio EPA. Carbon Limestone Landfill has a permitted average daily volume of 6,500 tons. In 2004, Carbon Limestone Landfill received 28,684 tons of municipal solid waste from Erie County. In response to Erie County's Request for Proposals for Reservation of Disposal Capacity, Carbon Limestone Landfill stated that it would reserve 250,000 tons per year of disposal capacity for Erie County municipal solid waste.

3. Chautauqua County Landfill - Chautauqua County, New York

Chautauqua County Landfill is located at 3889 Towerline Road, Ellery, Chautauqua County, New York. It is municipally owned and operated by Chautauqua County pursuant to Permit No. 9-00006/00013 issued to the Chautauqua County Department of Public Works by the New York Department of Environmental Conservation (DEC). The DEC permit for Chautauqua County Landfill expires on July 23, 2009. Chautauqua County Landfill is permitted to receive 102,000 tons per quarter, 408,000 tons per year. Chautauqua County Landfill currently receives approximately 348,000 tons per year of waste. The Landfill currently has 1.5 million tons of permitted capacity and has plans to continue to develop disposal capacity on the 800 acres of its site. In 2004, Chautauqua County Landfill received 1,417 tons of municipal solid waste generated in Erie County. In response to Erie County's Request for Proposals for Reservation of Disposal Capacity, Chautauqua County Landfill stated that it would reserve 25,000 tons per year for Erie County municipal solid waste.

4. County Landfill - Clarion County, Pennsylvania

County Landfill is located at 344 Walley Run Drive, Leeper, Pennsylvania. County Landfill is a division of Allied Waste Industries, Inc. and operates under DEP Permit No. 101187, which expires on June 27, 2010. County Landfill is currently permitted to receive an average daily volume of 1,000 tons and maximum daily volume of 1,500 tons. As of the end of 2004, County Landfill had approximately three and one-half years of remaining disposal capacity on currently permitted acreage. County Landfill reportedly intends to seek a permit to expand its existing permitted facility. In 2004, County Landfill received 323 tons of municipal solid waste from Erie County. In response to Erie County's Request for Proposals for Reservation of Disposal Capacity, County Landfill stated that it would provide 4,000 tons per year of reserved disposal capacity from Erie County municipal solid waste.

5. Seneca Landfill - Butler County, Pennsylvania

Seneca Landfill is located in Jackson Township, Butler County, Pennsylvania. The facility is owned and operated by Seneca Landfill, Inc. pursuant to Pennsylvania Solid Waste Permit No. 000403, which expires on October 5, 2010. The permitted average daily volume for Seneca Landfill is 3,000 tons per day and its maximum daily volume is 3,000 tons per day. As of June 30, 2004, Seneca Landfill has approximately 7.3 years of remaining disposal capacity based on the maximum daily volume of 3,000 tons per day. Based on the historic average actual waste disposal of 1500 tons per day, remaining disposal capacity is approximately 14.6 years. Seneca Landfill has stated that it will pursue an expansion to allow the landfill to remain a viable disposal option during the time period covered by this Plan Update. In response to Erie County's Request for Proposals for Reservation of Disposal Capacity, Seneca Landfill stated that it would provide 5,000 tons per year of reserved disposal capacity for Erie County waste.

6. Tri-County Landfill - Pine/Liberty Township, Mercer County, Pennsylvania

Tri-County Landfill, Inc., currently has a permit application pending with the DEP for the Tri-County Landfill. The facility is proposed to be located at 159 TCI Park Drive, Grove City, Pennsylvania. Per its permit application, Tri-County Landfill is requesting permission to accept an average of 3,000 tons per day until such time as the Tri-County transfer station ceases to accept waste at the adjacent facility. Once the transfer station has ceased operations, Tri-County Landfill proposes to receive an average of 4,000 tons per day, along with a maximum daily volume of 4,000 tons. As an unpermitted facility, Tri-County Landfill did not receive any municipal solid waste from Erie County in 2004. In response to Erie County's Request for Proposals for Reservation of Disposal Capacity, Tri-County Landfill stated that it would provide 5,000 tons per year of reserved disposal capacity for Erie County waste.

7. Greentree Landfill - Fox Township, Elk County, Pennsylvania

Greentree Landfill is located at 635 Toby Road, Kersey, Pennsylvania. Greentree Landfill is owned by Onyx Greentree Landfill, LLC. It operates pursuant to DEP Permit No. 101397, which expires on November 10, 2008. Greentree Landfill has a permitted average daily volume of 5,500 tons and a maximum daily volume of 6,000 tons. According to available figures, Greentree Landfill has over 10 years of remaining disposal capacity. Greentree Landfill received no Erie County municipal solid waste in 2004. In its response to Erie County's Request for Proposals for Reservation of Disposal Capacity, Greentree stated that it would provide 60,000 tons per year of reserved disposal capacity for Erie County waste.

B. SUMMARY OF DISPOSAL FACILITIES

In 2004, Erie County municipal solid waste was disposed of at five facilities. All of these facilities have responded to Erie County's Request for Proposals for Reservation of Disposal Capacity and the responses provide adequate cost-effective capacity to handle existing and future waste generation in the County.

C. TRANSPORT/PROCESSING FACILITIES

1. Waste Management Transfer Station

The Waste Management Transfer Station operates pursuant to DEP Permit No. 100691. The facility is located at 1154 West 16th Street between Raspberry and Cranberry Streets in the City of Erie.

2. World Resources Transfer Station

The World Resources Transfer Station operates at 1631 East Avenue, Erie, Pennsylvania. It operates pursuant to DEP Permit No. 101646.

3. Avenue A Transfer Station

Avenue A Transfer Station is located at Avenue A, Corry, Pennsylvania. It operates pursuant to DEP Permit No. 100954.

4. Envirofill Transfer Station

Envirofill Transfer Station is located at 1626 Raspberry Street, Erie, PA. It operates pursuant to DEP Permit No. 101487.

There is sufficient transfer station capacity to handle municipal solid waste generated in Erie County. A limited number of out-of-county transfer stations also receive Erie County municipal solid waste.

D. WASTE TRANSPORTATION

Erie County requires that persons engaged in the transportation of municipal waste and/or source-separated recyclable materials generated within the boundaries of the County be licensed on an annual basis by the Erie County Department of Health. The license requirement ensures that waste is transported in a safe manner. A list of the current licensed transporters in Erie County is at Exhibit 10. The Commonwealth of Pennsylvania also licenses waste transporters pursuant to the Waste Transportation Safety Act. A list of the Erie County waste haulers licensed by the State is at Exhibit 11.

E. NON-IMPAIRMENT

The proposed Plan will not substantially impair the use of the remaining permitted capacity. As defined in the regulations, Erie County will not cause a substantial impairment or interfere with any of the facilities that are currently receiving Erie County municipal solid waste.

CHAPTER 3: ESTIMATED FUTURE CAPACITY

The data that provides the basis for estimating the future volumes of Erie County municipal waste for the 10-year period covered by this Plan is located in Chapter 1 of the Plan. Based on that information, it is estimated that the future disposal capacity needed during the 10-year period covered by this Plan will be a maximum of 250,000 tons per year. This number was arrived at by reviewing the increase in municipal waste disposal over the past 10-year period. While Erie County believes that its ongoing efforts at waste minimization and recycling may reverse the trend of increased waste disposal observed during the past 10 years, or at least minimize the growth of that number, the County has determined that it is appropriate to follow a conservative approach in determining future capacity needs. The overall increase in annual total waste disposal from 1996 to 2004 was 30,400 tons. This increase was added to the total waste disposal for 2004 of 215,900 tons/year to arrive at a potential maximum disposal rate for the time period of this Plan of 245,300 tons/year. This amount was rounded up to 250,000 tons/year for purposes of securing the required disposal capacity assurance agreements.

The municipal waste system within Erie County provides for several waste disposal facilities in the Plan on a non-exclusive basis. Erie County advertised and received proposals for municipal waste disposal reservation of capacity agreements. The proposals received from various vendors demonstrate that there is currently excess capacity available to handle the volume of municipal waste generated within Erie County. Such capacity may be contractually reserved for Erie County municipal waste. Table 3-1 below tabulates the needed capacity and proposed available reserve capacity for Erie County municipal waste.

Table 3-1

**FUTURE CAPACITY REQUIRED AND RESERVE CAPACITY
ERIE COUNTY MUNICIPAL WASTE TONS/YEAR**

Erie County Future Capacity Required:
250,000 tons/year

<u>Disposal Site</u>	<u>Reserved Capacity Available to Erie County</u>
Onyx Greentree Landfill, LLC	60,000 tons/year
Chautauqua County Landfill (NY)	25,000 tons/year
Seneca Landfill, Inc.	5,000 tons/year
Tri-County Landfill	5,000 tons/year
Waste Management of Pennsylvania (Lakeview Landfill)	250,000 tons/year
County Landfill	4,000 tons/year
BFI of Ohio (Carbon Limestone)	<u>250,000 tons/year</u>
	599,000 tons/year

Erie County does not believe that the amount of residual waste generated in Erie County and disposed of at the disposal facilities proposed for inclusion in this Plan will impact the amount of estimated future disposal capacity needed by Erie County. Based on the 2002 residual waste disposal figures from DEP, which are the most recent available figures, Erie County facilities disposed of approximately 60,770 tons of residual waste at the facilities proposed for inclusion in this Plan. The majority of the residual waste was disposed of at Lakeview Landfill (55,498 tons), with the remaining tonnage being disposed of at Carbon Limestone Landfill (5,074 tons) and County Landfill (198 tons). This amount, even added to the maximum estimated waste disposal of 250,000 tons/year, is only slightly above 50% of the proposed reserved capacity of Erie County. Therefore, residual waste should not significantly impact Erie County's estimated future capacity needs.

The reserved capacity provided by the above-referenced proposals is over twice the projected capacity needed for the County. Therefore, the County has determined that there is no need for additional disposal capacity during the term of this Plan.

CHAPTER 4: DESCRIPTION OF RECYCLING PROGRAM/MATERIALS

This section describes the recyclable materials and recycling efforts in Erie County and the impact those efforts are having on the amount of municipal waste requiring disposal/processing capacity.

A. **RECYCLABLE MATERIALS DESCRIPTION**

Act 101 specifically identifies certain materials for recycling. The listed materials are clear glass, colored glass, aluminum, steel and bimetallic cans, high-grade office paper, newsprint, corrugated paper and plastics. All of these materials are recycled in significant quantities in Erie County (See Table 4-1).

Table 4-1

**ERIE COUNTY RECYCLING TOTALS
ACT 101 MATERIALS**

<u>Materials</u>	<u>Avg Tons/Year (2001-04)</u>
Clear Glass	581
Colored Glass (inc. Mixed)	616
Aluminum Cans	1,507
Steel/Bimetal Cans (inc. Mixed)	1,156
Office Paper	400
Newsprint	8,208
Corrugated Paper	10,808
Plastics	613

In addition to the Act 101 recyclable materials, the following materials are recycled in large quantities in Erie County: Metals (Brass, Copper, Ferrous, Stainless Steel, White Goods), Commingled Materials, Tires and Wood Waste. Leaf and yard waste are also collected and recycled in many parts of Erie County (22,400 tons in 2004).

B. **POTENTIAL BENEFITS OF RECYCLING**

Recycling returns raw materials to the manufacturing process which in turn eliminates the need to consume a like amount of new raw materials that normally would have been depleted from the world's natural resources, a presently indefinable benefit. It also conserves the space, energy, and raw materials which would have been required to dispose of the recyclable items had they not been removed from the municipal waste stream. The reuse of any normal waste materials that prevents the consumption of additional raw materials and removes that waste material from municipal waste stream volume has a long term environmental value.

Further advantages of recycling include the potential cost reduction associated with the reuse of an item versus its disposal. Although costs will be incurred preparing and transporting the recycled item to allow for its reuse, the value of that item, as a replacement to the previously used raw material, should help to defray the cost. Recyclables also have a value as a raw material for the production of recycled content products. Another economic benefit of recycling is the avoided cost of municipal waste disposal.

C. EXISTING MATERIALS RECOVERY OPERATIONS

There is only one material recovery facility in Erie County as that term is defined in the DEP regulations. World Resource Recovery System located in the City of Erie handles a variety of materials including newspaper, magazines, cardboard, office paper, cans, glass and plastic. Figures for the amount of material handled by this facility are not currently available.

D. RECYCLING PROGRAM IN ERIE COUNTY

Public recycling efforts in Erie County are principally addressed by the individual municipalities as provided for in Act 101. The programs include both curbside and drop-off programs and have been well established for many years. See Exhibit 12. Six (6) municipalities in Erie County are mandated by Act 101 to establish recycling programs. The six mandated municipalities are: City of Erie, City of Corry, Fairview Township, Harborcreek Township, Millcreek Township and Edinboro Borough. Each of the six mandated municipalities have a municipal curbside collection system. In addition, 13 non-mandated municipalities have a municipal curbside collection system. The non-mandated municipalities with curbside collection programs are as follows: Franklin Township, Girard Borough, Girard Township, Greene Township, Greenfield Township, Lake City Borough, Lawrence Park Township, North East Borough, North East Township, Platea Borough, Summit Township, Union City Borough, and Wesleyville Borough. Approximately 88% of Erie County's population is served by curbside recycling programs.

In addition to the curbside collection system, there are 15 recycling drop-off sites in the County. The drop-off sites are as follows: Venango Township Municipal Building (Venango Township), Holy Trinity Lutheran Church (Albion), Our Lady of the Lake Church (Edinboro), Erie Energy (City of Erie), Waste Management Transfer Station (City of Erie), World Resources Recovery Systems (City of Erie), Fairview Evergreen Nursery (Fairview), St. Mary's Church (Lawrence Park), Belle Valley Presbyterian Church (Millcreek), Millcreek Township Municipal Building (Millcreek), Millfair Road Compost Site (Millcreek), Lake Shore Railway Museum (North East Borough), Lakeview Landfill (Summit), St Mark's Lutheran Church (Waterford Borough) and Woodlawn Avenue Site (Wesleyville Borough). Many of the drop-off sites only accept certain types of recyclable materials.

Specific recycling information for each municipality and drop-off program for which the County has information is located in Exhibit 13.

Overall, the total tons of materials that are recycled in Erie County is experiencing an upward trend. See Table 1-1. Recycling totals by municipality or program for the past three years are listed in Table 4-2.

Table 4-2

RECYCLING TOTALS BY MUNICIPALITY/PROGRAM
TONS/YEAR

<u>Mandated Municipality</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>
City of Erie	20,108	20,739	29,839
City of Corry	1,290	1,260	2,426
Millcreek Township	31,045	33,704	31,394
Harborcreek Township	4,073	4,706	4,898
Fairview Township	693	2,609	2,762
Edinboro Borough	1,250	1,304	1,344
<u>Non-Mandated Municipality</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>
Concord Township	--	--	8
Elgin Borough	--	--	11
Elk Creek Township	--	--	21
Franklin Township	6	9	10
Girard Borough	167	388	269
Girard Township	416	395	489
Greene Township	271	744	286
Greenfield Township	109	137	187
Lake City Borough	165	220	173
Lawrence Park Township	299	255	318
North East Borough	1,642	2,817	3,942
North East Township	188	753	489
Platea Borough	15	25	14
Summit Township	3,873	3,128	4,209

Union City Borough	302	239	6,013
Venango Township	61	41	91
<u>Non-Mandated Municipality</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>
Wayne Township	--	--	15
Wesleyville Borough	313	216	802
<u>Programs</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>
Holy Trinity (Albion)	92	182	77
St. Mark's (Waterford)	77	88	590

The role of Erie County government in recycling efforts has been to support the municipal-based recycling programs, assist in special-event programming, address issues raised by individuals, businesses and institutions and provide education on recycling issues. Erie County government efforts are led by the Erie County Recycling Coordinator. Support of the municipalities by the Recycling Coordinator has included assistance in obtaining grants and information regarding recycling operations. Special-event programming has included household hazardous waste collections and e-cycling events for the collection of electronics. In September 2002, Erie County co-sponsored a household hazardous waste drop-off event which collected 92.4 tons of material. Materials collected included paint, pesticides, chlorine, flammables, anti-freeze and mercury batteries. In June 2003, Erie County co-sponsored the first e-cycling event in the County. This event collected 27.8 tons of items including computers, electronics, televisions, VCRs and printers. The Recycling Coordinator maintains the County recycling hotline and the county recycling information website, www.recyclethis.org.

E. MEASURES FOR INCREASING AMOUNT OF MATERIAL RECYCLED

In 2004, Erie County disposed of 215,900 tons of municipal waste and recycled a total of 90,622 tons. Based on these figures, the recycling rate for Erie County in 2004 was 29.6%. This represented an improvement over 2002 (24.5%) and 2003 (26.2%) and continues a general upward trend in the recycling rate in Erie County that has existed for several years. However, the current recycling rate falls short of the state goal of 35% by 2003. While some of the shortfall may be explained by the failure of the figures reported by the municipalities to capture some of the recycling that occurs in commercial and institutional facilities, the County believes that opportunities exist to raise the recycling rate in both existing programs and through new efforts.

Existing recycling programs in Erie County capture a significant amount of the recyclable material that exists in the waste stream. But anecdotal evidence, as well as existing studies, make it clear that a significant amount of recyclable material is still sent to area landfills for disposal. In 2001, DEP retained R.W. Beck to perform a state-wide municipal solid waste study to better understand the composition of solid waste being disposed in Pennsylvania (See Statewide Waste Composition Study, R.W. Beck, April 2003, available through the DEP website at www.dep.state.pa.us, hereinafter, the "Beck Study"). One of the issues evaluated in the Beck Study was the amounts of Act 101 recyclables in the disposed waste. In order to assess this issue, the Beck Study conducted field sampling of the waste as it arrived at the disposal site. In northwest Pennsylvania, two disposal sites were evaluated, Lakeview Landfill in Erie County and Greentree Landfill in Elk County. The figures in the Beck Study aggregate the disposal numbers from both of these facilities so that direct conclusions about Erie County disposal practices cannot be drawn. However, since Lakeview was one of only two sites sampled and since Lakeview handles the disposal of approximately 90% of the waste generated in Erie County, it is safe to assume that the numbers in the Beck Study reasonably reflect the waste disposal habits of Erie County residents and businesses. These numbers suggest that, in general, current recycling programs in Erie County may be capturing less than half of the potentially recyclable material in the waste stream in Erie County. The percentage varies by material and is only a rough approximation but it suggests that there is still plenty of opportunity for improvement in the existing efforts and for new efforts.

In addition to continuing and/or enhancing its existing recycling programming efforts in areas such as household hazardous waste and e-cycling, the County proposes to implement multiple new strategic initiatives to try and improve on the collection of recyclable materials. The first strategy will focus on improving education and outreach in the County by focusing on the tangible and intangible benefits of recycling. The City of Erie's recycling numbers showed significant improvement in 2004 over prior years numbers. The improvement appears to correspond with an aggressive advertising campaign by the City administration linking improved recycling efforts with specific improvements in city services. In discussions within the Act 101 Advisory Group, this effort was cited as an example of the type of approach that was likely to get a strong response from the citizens of Erie County. It was also mentioned that many residents probably have only a limited understanding of the savings in their waste disposal costs that are created by recycling. The County proposes to study and document the benefits of recycling in Erie County and to work on making this information readily available to the municipalities and their residents. The County believes that an education effort based on the benefits of recycling, particularly focusing on cost savings, will reduce the amount of recyclable material currently being sent to landfills for disposal.

The second strategy is to work to develop recycling programs in the southern portion of Erie County. A glance at the map of Erie County recycling programs found at Exhibit 12 quickly reveals the lack of existing programs in many of the municipalities in this area. The Erie County Recycling Coordinator has previously worked with these municipalities to implement a recycling program but that effort did not come to fruition. The County intends to renew that effort to assist the municipal officials in this portion of the County in finding recycling approaches that are acceptable to the residents. Options include efforts to get a

private recycling company interested in providing its services in this area or setting up a regional drop-off program.

A third strategy involves investigating recycling/composting opportunities for organic materials. In the Beck Study, organics were identified as the single most prevalent material being disposed of in municipal waste landfills in the northwest Pennsylvania region including Lake View Landfill. Organic materials comprised about 34.3% of the municipal solid waste disposed of at these sites during the period of the Beck Study. The organics category in the Beck Study includes the following materials: yard waste-grass, yard waste-other, wood-unpainted, wood-painted, food waste, textiles, diapers, fines and other unclassified organics. (See 2001 State-Wide MSW Characterization Study, Appendix A for material definitions. This study is available on DEP's website.) Erie County residents are currently composting significant amounts of yard waste (22,400 tons in 2004). Erie County is currently unaware of any other of the listed organics being recycled/composted on anything other than an individual basis. Among the organics materials categories, food waste represented the single largest item and accounts for almost 10% of the total municipal solid waste disposed of at the regional landfill sites, including Lake View Landfill. Therefore, Erie County intends to evaluate opportunities to increase the recycling and/or composting of organic material, including working with the existing yard waste programs and looking to partner with institutions and educational facilities on food waste composting.

A fourth strategy involves a County-lead effort to improve communications and overall waste management practices in Erie County. The County proposes to hold an annual Act 101 Waste Management and Recycling Summit. The County envisions this Summit as a multi-day event for local municipal and County officials, state officials, industry representatives, environmental groups and the general public. Among the possible topics/sessions would be an evaluation of current management practices, educational sessions focused on waste minimization/recycling practices geared towards municipal officials and the general public, demonstration/exhibits of recycled products, etc. The County believes that this effort would enhance the County waste management efforts, increase dialogue on these issues in the County and provide a significant educational opportunity on an annual basis. The County envisions using the Summit to develop an annual state of waste management/recycling report for the County. In order to implement the annual Summit, the County plans to meet with interested parties to develop the Summit idea with a goal of holding the first such Summit in Fall 2006.

The fifth strategy involves addressing the recent efforts of DEP to focus on market development for recycled materials and sustainable recycling programs. These DEP efforts have resulted in a series of reports and initiatives, the latest being the issuance of a report entitled "Building Financially Sustainable Recycling Programs" (R.W. Beck, April 2005). The County intends to study the ideas coming out of these DEP efforts and assist in bringing these ideas to the municipalities in Erie County and assist in implementing appropriate ideas in the County. Among the ideas that are being discussed is the use of pay as you throw programs to reduce waste generation and increase recycling. Copies of the DEP sponsored reports can be found on the DEP website.

Finally, it is likely that the recycling levels in businesses and institutions are greater than is currently being documented. The County Recycling Coordinator will look for ways to improve the collection of recycling data from these organizations. The efforts will include a calling program modeled on the state's business development calling program where contact is made with all of the County's major businesses on an ongoing basis. It is believed by the County that an effort focused on direct contacts with the major businesses and institutions located in the County will improve the collection of accurate numbers and also identify some currently unrealized opportunities for greater waste minimization/recycling at these facilities.

Implementing these strategies and data collection efforts, along with other approaches that will undoubtedly develop over the ten year period this Plan is in place, will ensure the County meets and exceeds the 35 percent recycling goal.

**CHAPTER 5:
SELECTION AND JUSTIFICATION
OF MUNICIPAL WASTE MANAGEMENT PROGRAM**

A. OVERVIEW OF SELECTED MUNICIPAL WASTE MANAGEMENT SYSTEM

The current municipal waste management system in Erie County involves a combination of public and private participation. Waste collection in the County is conducted by both private and public entities. Processing and disposal services are generally conducted by private entities. Recycling in Erie County is principally a municipal government-led effort although the actual collection and processing of recyclables in some municipalities is a contracted service provided by private companies through municipal contracts. Processing and disposal of construction and demolition waste is managed by the private sector. Sewage septage and biosolids are managed by a mix of private and public entities with the bulk of these materials in Erie County being handled by public entities. Infectious and chemotherapeutic waste is managed privately. Erie County believes that the current system is effective in ensuring that municipal waste generated in Erie County is handled in a safe and environmentally sound manner and, therefore, the County plans on maintaining this system for the ten-year planning period covered by this Plan.

The reasons for electing to continue with the current system are as follows:

- Meets Act 101 Public Goals - The current system satisfactorily meets Act 101's twin goals of protecting the public health, safety and welfare from the dangers of transportation, processing, treatment, storage and disposal of municipal waste and promoting the recycling of waste. The proposed improvements to the current system discussed in the Plan will further enhance these benefits.
- Efficient - The current system is efficient in that all of the municipal waste in Erie County is readily handled without difficulty. There is no identified problem with the unauthorized dumping of municipal waste. This is due in part to the convenient options for generators presented by the existing collection, processing and disposal systems currently in place. Curbside recycling programs cover approximately 88% of the population in the County and, in addition, there are available drop-off programs. C&D waste is handled by the main disposal facility in the County. Other municipal waste is handled by centrally located, readily available sites.
- Cost-Effective - The current system is cost-effective. Disposal rates are competitive because of the multiple facilities available to Erie County generators. Transportation rates reflect the reasonable proximity of the facilities to the generators in the County.
- Sufficient Capacity - The current system has sufficient capacity to handle the municipal waste projected to be generated in the County during the ten-year period covered by this Plan.

While the County intends to maintain the central aspects of the current system, it also plans to seek to improve the system in the areas of waste minimization and recycling.

B. THE PLAN DEVELOPMENT AND SELECTION PROCESS

On June 4, 2003, the Erie County Executive issued a notice, pursuant to § 503 of Act 101, that the County had begun and was in the process of developing a substantial revision to its Act 101 Plan. See Exhibit 14. DEP concurred that the proposed Plan revision would be considered a "substantial revision" under Act 101. By a letter dated February 17, 2005, DEP formally notified Erie County that it was approved for a Municipal Waste Planning Grant to support the Plan development (See Exhibit 15).

Based on discussions with the Act 101 Advisory Committee and its positive experience with the existing waste management system, Erie County determined that it would continue the non-exclusive disposal facility system currently in place in Erie County by soliciting reservation of capacity agreements from interested parties. On November 19, 2004, Erie County issued a Request for Proposals ("RFP") for Reservation of Capacity Agreements Relating to Disposal or Processing of Municipal Solid Waste. The RFP package is set forth as Exhibit 16. The availability of the RFP was publicly advertised in the following newspapers: the Erie Times News (Erie, PA), the Pittsburgh Post-Gazette (Pittsburgh, PA), the Jamestown Post-Journal (Jamestown, NY), the Buffalo News (Buffalo, NY), and The Cleveland Plain Dealer (Cleveland, OH) (See Exhibit 17). In addition, a notice of the availability of the RFP was sent to all identified facilities within approximately 100 miles of Erie County (See Exhibit 18). Subsequently, on January 5, 2005, the County received and opened several proposals for waste disposal capacity reservation agreements. Six bids were received as follows:

- Chautauqua County DPF- Division of Solid Waste - 25,000 tons/yr
- County Landfill - 4,000 tons/yr
- Waste Management of PA d/b/a Lakeview Landfill - 250,000 tons/yr
- BFI of Ohio Industries - Carbon Limestone Landfill - 250,000 tons/yr
- Seneca Landfill, Inc. - 5,000 tons/yr
- Tri- County Landfill, Inc. - 5,000 tons/yr

See Exhibit 19 for the Bid Opening Notes. (Please note that the Bid Opening Notes correctly list that six bids were received but Tri-County was inadvertently left off the list of results).

A seventh proposal from Greentree Landfill for 60,000 tons/yr was received after the date for submittal of the bid proposals. Based on the non-exclusive nature of the proposed

agreements, the County determined that it would accept the proposal from Greentree Landfill for review with the other proposals.

The proposals were evaluated in accordance with the evaluation factors included in the RFPs. Following the submittal of additional information requested by the County from some of the facilities, it was determined by the County that each of the seven facilities satisfied the criteria for inclusion as designated facilities in the Erie County Solid Waste Management Plan. Erie County will proceed to enter into agreements in the general form included at Exhibit 20 with each of these facilities. If the County is unable to reach a satisfactory agreement with a facility, the County reserves the right to remove that facility from the list of designated facilities under the Plan. Assuming it can reach agreement with each the facilities, the designated facilities will have reserved 599,000 tons/year of disposal capacity for Erie County. This is more than twice the estimated future annual disposal needs of Erie County so it is anticipated that the system will have more than sufficient capacity to meet the disposal needs of the County. In addition, the inclusion of multiple disposal facilities will ensure efficient and cost-effective disposal options for Erie County generators.

Under the proposed agreements (attached as Exhibit 20), Erie County proposes to increase the fee it receives for the disposal of Erie County generated municipal waste as well as for waste disposed of in Erie County. These agreements with the disposal facilities are currently being negotiated. The implementation fees received by Erie County are used solely to offset the County's costs in preparing, updating, revising and implementing the Plan and in carrying out its waste management responsibilities required under Act 101.

C. PROCEDURES FOR ADDING DISPOSAL FACILITIES

If, during the 10-year period that this Plan is in place, additional disposal facilities express an interest in becoming a designated facility in the Plan, or a County licensed hauler, municipality or business desires to utilize a facility that is not included in the Plan, the procedure described below must be followed to add that facility to the Plan so that it can receive waste generated from within Erie County. The County wants to be certain that any facility receiving Erie County waste is capable of handling that waste in compliance with Commonwealth rules and regulations.

The procedure for a facility to be added is as follows:

The facility notifies Erie County of its desire to be added as a designated facility by sending a written request to the Director of the County Department of Economic Development and Planning or another County agency if so designated by the County.

The facility will be provided with a copy of the RFP used to solicit proposals for the currently designated facilities and directed to complete it and submit the requested information.

The response from the facility will be reviewed by the County using the evaluation factors identified in the RFP.

If the facility satisfactorily meets the requirements outlined in the RFP it will be requested to enter into a Reservation of Disposal Capacity Agreement with the County.

Once the written agreement is fully executed by the facility and the County, the County will notify in writing all Erie County municipalities and DEP that the facility has been added to the County Plan as a non-substantial Plan Revision.

The facility will then be free to accept Erie County generated waste.

Erie County intends to make the process of adding a new facility to its Plan as simple and efficient as possible while assuring that the interest of the County in the safe disposal of County generated waste is maintained.

D. RECYCLING PROGRAM FOR ERIE COUNTY

Erie County will maintain the existing recycling program currently in place in the County while seeking to further enhance certain aspects of the program. The recycling program as well as multiple new strategic initiatives for improving the recycling rate in Erie County are discussed in Chapter 4. The County believes that maintaining its current efforts to support the existing recycling program along with the proposed strategies to improve the system are the basis for an effective recycling program in Erie County during the ten-year period of the Plan. In addition, the County intends to focus additional attention on household hazardous waste and e-cycling efforts. These have been identified as continuing areas of concern. The County has had experience in planning and executing special collection activities, therefore, it seems a natural extension of those efforts to focus on holding special household hazardous waste and e-cycling events. The nature and frequency of these events will depend on issues of need and funding. The County plans to evaluate the need and best method for implementing these services and move forward with a detailed plan in the near future. This task will be one of the prime responsibilities of the new Erie County Recycling Coordinator.

E. WASTE MINIMIZATION

Over the ten-year period of the prior Plan, waste generation in Erie County continued to grow at a rate that exceeded the growth in population. Similar growth in the rate of waste generation has been noted in other Pennsylvania counties and on a national level. In general, the increase in waste generation appears to correspond with a significant growth in the retail sector in Erie County. As a result of the increase in waste generation and despite increases in the recycling rate offsetting some of the gain, disposal needs and its corresponding costs have increased in Erie County. In order to address some of these increases, Erie County proposes to develop initiatives on waste minimization with the goal of stabilizing the growth in waste generation near the current levels and ultimately reducing those levels. Since waste minimization requires changes in behavior, Erie County will strive to educate its residents and organizations on waste minimization issues and opportunities through efforts such as the Annual Act 101 Waste Management and Recycling Summit. The Erie County Recycling Coordinator will undertake one or more of the following specific initiatives:

- Promote Material Exchange Programs - A material exchange program provides a mechanism for individuals, businesses or groups to make available to other parties materials that are no longer useful to them but which may be useful to others. Rather than throw the materials out and add them to the waste stream, the material can be put to productive use. Items that are typically available may include computers, furniture and industrial by-products. A number of existing material exchange programs currently exist including the Pennsylvania Material Trader Program sponsored by the PA Small Business Development Center (www.materialtrader.org). A listing of national material exchange programs can be found at www.wastexchange.org/exchanges/top_list.cfm. Rather than attempt to start its own program, Erie County intends to have the Erie County Recycling Coordinator and other staff promote the existing programs to potential users. Promotion will take the form of electronic communications with potential users, advertising, seminars, etc. The Erie County Recycling Coordinator will monitor the type and number of exchanges and promote any successes.

- Educate on Packaging Issues - The Beck Study found that approximately 25% of the residential waste disposed of in Pennsylvania was made up of packaging and packaging components. Efforts to educate residents on the impact of packaging and the promotion of efforts to limit packaging will enhance waste minimization efforts in Erie County. The County will seek to develop and/or implement educational programs related to the minimization or elimination of packaging.

- Educate on Pay As You Throw Programs - A pay-as-you-throw program (PAYT) (also known as unit pricing or variable pricing) involves a system where municipal waste collection and disposal costs are based on the amount that an individual, business or other organization throws away. The less waste a generator throws away, the less they pay. PAYT programs are designed to ensure that the costs of waste generation are directly borne by the party generating the waste and typically may involve charging a per bag fee or providing variable size trash cans and setting rates according to the size of the can. Erie County does not currently have any exclusive PAYT programs in place in any of the municipalities although some municipalities do have contracts with waste collectors that provide for a PAYT option. It appears that the presence of this option may not be well known by all residents within the municipalities where it exists. Erie County plans to evaluate these existing PAYT options and, if it determines that it is appropriate, it will promote their use as well as the inclusion of the option by other municipalities in future agreements. In addition, Erie County will support and assist any municipality that is interested in evaluating and potentially implementing a PAYT system.

Erie County will look for other opportunities to promote waste minimization.

F. ERIE COUNTY CONSTRUCTION AND DEMOLITION WASTE PLAN

As a result of Erie County's experience, and based upon input from vendors, generators and municipal officials, the County's Plan regarding construction and demolition waste ("C&D" waste) will remain unchanged from previous Plans which provide that C&D waste generated within Erie may be disposed of at any of the designated facilities, so long as they are

fully permitted to take C&D waste. C&D waste may also be disposed of at any captive, private, fully permitted disposal facility owned, operated, and exclusively utilized by the entity that performed the C&D operations that created such C&D waste.

G. SPECIAL HANDLING WASTE PLAN

The existing system of private and public entities have proven satisfactory for the safe and efficient handling of special handling wastes such as infectious and chemotherapeutic waste and biosolids/sewage sludge. Therefore, the County Plan does not propose any changes to the existing system.

CHAPTER 6: LOCATION OF FACILITIES AND PROGRAMS

The location of municipal waste processing or disposal facilities currently servicing or proposed to service Erie County under this Plan are as follows:

Municipal Waste Disposal Facilities

Lakeview Landfill (Erie County, PA)
851 Robison Road East
Erie, PA 16509

Onyx Greentree Landfill, LLC (Elk County, PA)
635 Toby Road
Kersey, PA 15846

County Landfill (Clarion County, PA)
344 Walley Run Drive
Leeper, PA 16233

Seneca Landfill (Butler County, PA)
P.O. Box 1080
Mars, PA 16046

Tri-County Landfill (Mercer County, PA)
159 TCI Park Drive
Grove City, PA 16127

NOTE: This facility has an application pending with DEP, but it is currently not permitted for municipal waste disposal.

Chautauqua County Landfill (Chautauqua County, NY)
3889 Toweville Road
Jamestown, NY 14701

Carbon Limestone Landfill (Mahoning County, OH)
8100 S. Stateline Road
Lowellville, OH 44436

Special Handling Waste Disposal Facilities in Erie County

Erie Sewer Authority/Erie City Sewage Sludge Incinerator
68 Port Access Road
Erie, PA 16507

Hamot Medical Center/Infectious/Chemotherapeutic Waste Private Incinerator
201 State Street
Erie, PA 16507

Municipal Waste Transfer Stations in Erie County

World Resources Recovery Systems
1631 East Avenue
Erie, PA 16503

Avenue A Transfer Station
Avenue A
Corry, PA 16407

Envirofill Transfer Station
1626 Raspberry Street
Erie, PA 16502

Waste Management Transfer Station
1154 West 16th Street
Erie, PA 16502

Recycling Programs in Erie County

There are currently 20 municipal recycling programs in Erie County, 19 curbside and 1 drop off. (See Exhibit 12). Six of the municipalities, City of Erie, City of Corry, Millcreek Township, Harborcreek Township, Fairview Township and Edinboro Borough, are mandated to operate recycling programs by the Commonwealth. The remaining municipal programs are voluntary. In addition to the municipal programs, numerous private and non-profit entities in Erie County accept a wide range of materials for recycling. A more detailed discussion of recycling can be found in Chapter 4.

CHAPTER 7: IMPLEMENTING ENTITY IDENTIFICATION

A. GOVERNMENTAL ENTITY RESPONSIBLE FOR IMPLEMENTING THE PLAN

The governmental entity that will be responsible for implementing the Erie County Municipal Waste Plan on behalf of the County is Erie County itself, through its Department of Economic Development and Planning and Department of Health. Individual municipalities, with assistance from the County as requested, will also be responsible for implementing the recycling provisions of the Plan and Act 101.

Erie County will continue to leave open the possibility of creating or reactivating an Erie County Solid Waste Management Authority to ultimately handle and/or coordinate all Act 101 and municipal solid waste planning and implementation activities within the County, although it currently has no specific plans to do so. It is contemplated that if an Erie County Solid Waste Authority were created, it would have regional representation from the various geographical areas within the County. There is an old inactive Erie County Solid Waste Authority still in existence, which was created in 1969 with regional representation. This existing Authority could potentially be reactivated, or a new authority could be created if that alternative would be preferable.

Finally, it is intended that the various ordinances and agreements used to implement Erie County's Act 101 Municipal Waste Plan would all contemplate and permit any Erie County rights and duties thereunder to be assigned and/or delegated to any such Authority, at Erie County's option, if and when it might come into existence.

B. LEGAL BASIS FOR GOVERNMENTAL ENTITY'S AUTHORITY TO IMPLEMENT THE PLAN

Under Act 101, the County as an entity has been expressly granted the power and duty to implement its Act 101 Municipal Waste Plan. See Act 101, § 303(a)(2). Similarly, municipalities other than counties have the power and duty to implement recycling programs in their communities. See Act 101, § 304.

A county may delegate some or all of its responsibility under Act 101 for municipal waste planning and implementation to an authority, although the county would remain jointly and severally liable with an authority for such responsibilities. See Act 101, § 303(d). Any future municipal authority would be organized pursuant to the provisions of the Pennsylvania Municipality Authorities Act of 1945, as amended, 53 Pa. C.S. Ch. 56.

CHAPTER 8: PUBLIC FUNCTION

A. WHETHER MUNICIPAL WASTE PROCESSING OR DISPOSAL SHALL BE A PUBLIC FUNCTION

It is not contemplated that municipal waste processing or disposal will be a public function in Erie County during the time period covered by this Plan, with the exception of the following activities:

(1) Waste Hauling. Some Erie County municipalities, including but not limited to the City of Erie, transport or haul municipal waste using their own employees and trucks. The disposal or processing facilities for such waste, however, are not publicly owned or operated.

(2) Municipal Recycling Programs. Part or all of the recycling programs in the mandated and non-mandated communities may be carried out as public functions.

(3) Composting. Various Erie County municipalities are operating composting facilities.

(4) Leaf and Yard Waste. Various Erie County municipalities are collecting, processing, and/or composting or disposing of leaf and yard waste.

(5) Sewage Sludge (including septage). Various Erie County municipalities are processing and disposing of sewage sludge (including septage) as a part of their operation of publicly owned sewage treatment facilities.

B. MECHANISM FOR SUCH PUBLIC FUNCTIONS

The mechanisms for the above-referenced public functions are already in place in the individual municipalities involved, including recycling ordinances where applicable.

C. DEMONSTRATE NON-AVAILABILITY OF RECYCLING AND PROCESSING EQUIPMENT IF COUNTY IS TO PURCHASE SUCH EQUIPMENT

During the period of this Plan, the County does not contemplate purchasing its own recycling processing equipment for County-wide use. It may purchase or replace recycling source-separation and/or storage containers for use in County-owned or County-related facilities. Individual municipalities may purchase or replace recycling processing equipment, subject to the limitations of Act 101 and its grant program. The County will assist individual municipalities or groups of municipalities in pursuing recycling initiatives in their geographic areas of responsibility.

D. COUNTY-OWNED OR OPERATED MUNICIPAL WASTE PROCESSING OR DISPOSAL FACILITY

During the period covered by this Plan, the County does not intend to own or operate a municipal waste processing or disposal facility. The reasons for not publicly owning such a facility include the following: already-existing capacity in the private sector, significant and unknown capital expenses, large operating and maintenance expenses, substantial technical and regulatory expertise required, possible environmental liability relating to any such facility, greater experience, expertise, and efficiency in the private sector, and difficulty in permitting and siting a new county-owned facility.

CHAPTER 9: IMPLEMENTING DOCUMENTS

A. PROPOSED IMPLEMENTING DOCUMENTS

Attached hereto are the following documents and proposed documents used to implement the Plan:

- (1) Draft Erie County/Vendor Agreement Form for Reservation of Waste Disposal Capacity Agreement (Exhibit 20). This proposed Agreement has not been accepted, approved or otherwise made binding upon Erie County, any particular vendor, or any other party. As required by Act 101, final executed agreements, revised ordinances, and other implementing documents will be submitted to DEP within one year after Plan approval.
- (2) Erie County Ordinance No. 96 of 1995 (Exhibit 21).
- (3) Additional implementing documents including but not limited to the Resolution of County Council adopting the Plan, Municipal Ratification Resolutions and DEP Plan Review and Approval documents shall be added to the Plan as Exhibit 22 when they are completed and available.

In addition to the above-referenced County documents, many Erie County municipalities have their own ordinances addressing municipal waste management and recycling.

B. AFFECTED AREAS, EFFECTIVE DATES, AND IMPLEMENTING MECHANISMS

The above-referenced implementing documents cover all of Erie County, with the exception of the various individual municipal solid waste ordinances, which cover only the particular municipality (other than the County) enacting such ordinance. The Erie County/Vendor Agreement Form for Reservation of Waste Disposal Capacity Agreements shall become effective no later than one (1) year after DEP approval of this Plan. The effective date of Erie County Ordinance No. 96 of 1995 was January 1, 1997.

CHAPTER 10: ORDERLY EXTENSION

This Plan Revision provides for the orderly extension of the municipal waste management systems in a manner that is consistent with the needs of Erie County. It takes into account current local, state and federal laws and regulations governing waste management. Land use planning and zoning, along with the best available population estimates, good engineering practices and economic factors were all evaluated as part of the Plan development. This Plan builds on the 1990 and 1995 Erie County Municipal Solid Waste Management Plans previously approved by DEP.

CHAPTER 11: METHODS OF DISPOSAL OTHER THAN BY CONTRACTS

As described in the Plan, the municipal waste system in Erie County involves public and private participants. Municipal waste is designated to be disposed of in designated facilities with which the County will have executed agreements for waste disposal capacity. The designated facilities are those who responded to the County's request for proposals for reservation of capacity. All of these facilities are permitted municipal waste landfills, with the exception of Tri-County Landfill, which has a permit application currently pending with DEP. The designated facilities are located in three states, Pennsylvania, Ohio and New York and provide a variety of choices for permitted alternatives for the individual municipalities, haulers, generators and other customers. The agreements with of these facilities ensure ten years of committed capacity for Erie County waste. The means of effectuating this approach is through Municipal Waste Reservation of Disposal Capacity Agreements with all of the designated facilities (Exhibit 20) as well as the existing Erie County waste ordinance (Exhibit 21).

CHAPTER 12: NON-INTERFERENCE

This Plan will not affect the design, construction, operation, financing or contractual obligations of any municipal processing or disposal facility, nor will it interfere with any such facility. There are no "subcounty plans" in Erie County within the meaning of Act 101.

CHAPTER 13: PUBLIC PARTICIPATION

On June 4, 2003, the Erie County Executive, Rick Schenker, provided all Erie County municipalities with a formal written notice, pursuant to Act 101 § 503, that Erie County had begun and was in the process of developing a substantial revision to its Act 101 Municipal Solid Waste Plan. (See Exhibit 13). In addition to the municipalities, other stakeholders in the Solid Waste planning process were also provided with the formal notice. (See Notification List, Exhibit 23). The County Executive's Notice of Act 101 Substantial Plan Revision Development was acknowledged by a Resolution passed by Erie County Council (See Resolution Number 43, 2003, Exhibit 24).

Following the formal public notice, an Act 101 Advisory Committee was formed. The membership of the committee changed over time. Lists of all of the members of the Erie County Act 101 Plan Advisory Committee are set forth as Exhibit 25.

The Act 101 Advisory Committee held several meetings regarding the proposed Plan. The agendas and minutes of these meetings are attached as Exhibit 26.

A mandatory public hearing on the proposed revised Plan was held on September 14, 2005 during the 90-day public comment period that ran from August 1, 2005 through October 29, 2005. The transcript from the public hearing is included as Exhibit 27. Comments received during the public comment period have been incorporated into the revised Plan as appropriate, and the written comments and a comment/response document are included in the Plan as Exhibit 28.

As part of the Plan implementation process, the County intends to continue with an Advisory Committee relating to the implementation of the Plan, pursuant to § 502 (p) of Act 101. The County proposes to continue with the current Advisory Committee and add additional members as necessary.

COMMENT/RESPONSE DOCUMENT

1. Written Comments of Steve Ropski, Ph.D.

A. Summary of Comment

The County should place a stronger emphasis on several of the waste minimization initiatives and set specific goals for those initiatives.

Response:

The County has broadly outlined a number of waste minimization and recycling initiatives in the Plan. The County appreciates your support of these initiatives, specifically pay-as-you-throw programs, material exchange programs and education on packaging issues. The County intends to follow up on the initiatives outlined in the Plan and make implementation of these efforts part of the ongoing job duties of the Erie County Recycling Coordinator.

B. Summary of Comment

Hazardous waste and e-cycling events were an overwhelming success and need to be addressed by the Plan.

Response:

These types of events are clearly discussed on Page 5-4 of the Plan under the heading "Recycling Program for Erie County." The County has identified these as areas in which it should take a lead role and has determined that the planning and implementation for these types of collection events will be the primary responsibility of the Erie County Recycling Coordinator.

C. Summary of Comment

More than one evening should be available for public comment.

Response:

There were several opportunities for public comment during the Plan development process. Advisory Committee meetings were held seeking input into the Plan. Once the draft Plan was developed, each municipality received a copy of the draft Plan and a copy was available at the Erie County Public Library for public review. In addition to the public hearing held on September 14, 2005, written comments were accepted by the County for 90 days. The narrative portion of the Plan was also posted to the Erie County website and people were encouraged to review this and provide comment.

2. Written Comments of Bruce Arkwright, Jr.

A. Summary of Comment

The County should promote a pay as you go program based on weighing the trash and paying by weight.

Response:

As outlined in the Plan, the County intends to evaluate existing pay-as-you-throw options in the County and, where appropriate, promote their use. The County will keep in mind your comment regarding paying by weight during this evaluation. In addition, Erie County will support and assist any municipality that is interested in evaluating and potentially implementing a pay-as-you-throw system.

B. Summary of Comment

The County should force businesses to recycle through enforcement efforts since business recycling is currently not working.

Response:

As outlined in the Plan, the County has outlined a strategy to address recycling levels in businesses and institutions, focusing on direct contacts with those businesses and institutions to evaluate current recycling efforts and look for additional waste minimization and recycling opportunities. At this point, the County is not aware of information that suggests that enforcement is either necessary or appropriate to increase recycling among the business community.

3. Written Comments of Mary S. Smith

A. Summary of Comment

The writer is concerned regarding recycling in Washington Township and the fact that curbside recycling is not available in her township.

Response:

State law dictates the requirements regarding mandating recycling for municipalities in the Commonwealth. Erie County does not presently intend to mandate recycling beyond that required by state law. Trash collection, including recycling, is usually contracted by the municipality for all the residents of the municipality or is directly contracted by the resident with the waste collection company. Therefore, municipalities and/or individuals are responsible for determining the scope of the contract regarding recycling and we would encourage the writer to address this issue with her township. Erie County does

intend to study the lack of recycling infrastructure in the south county area, including Washington Township, and to work with the municipalities in that area to improve recycling efforts.

4. Written Comments of Concord Township

A. Summary of Comment

The Township questioned the number of households in the township that have public sewer access as listed in Exhibit 5. They feel that the number is too high.

Response:

The information regarding the number of households with public sewer access in Concord Township was provided by the City of Corry which provides sewer service in a portion of Concord Township. We checked with the City of Corry regarding this issue, and they confirmed that the number of households listed in Exhibit 5 of the Plan is accurate. If the Township remains concerned, we would suggest that they speak with Corry.

5. Written Comments of Greenfield Township

A. Summary of Comment

An incorrect location was provided for Anthony Septic Service in Tab 7 - Erie County Septage Hauler Map.

Response:

An error in the map data caused an incorrect location to be displayed for Anthony Septic Service in Tab 7 - Erie County Septage Hauler Map. The error has been corrected and the map has been re-run with the corrected location.

B. Summary of Comment

The Township questioned why John Darby was not shown on the Erie County Septage Hauler List.

Response:

The list of county septage haulers was provided by the Erie County Department of Health. Erie County has checked with the Department of Health and has confirmed Mr. Darby as a septage hauler, and his name has been added to the list.

C. Summary of Comment

Additional information regarding the Greenfield Township recycling program was provided.

Response:

The additional information has been added to the chart found at Tab 13.

D. Summary of Comment

The Township commented that most municipalities are aware of the pay-as-you-throw program and that any education needs to be directed to other parties including landfills and haulers. They additionally commented that multi-municipal and/or countywide agreements or directives may be necessary to implement this activity.

Response:

As discussed in the Plan, the County intends to evaluate existing pay-as-you-throw programs in the County and promote those programs where appropriate. As part of this effort, the County intends to investigate the current knowledge base regarding pay-as-you-throw programs among the municipalities and individual citizens. Further, the County will seek to evaluate what, if any, barriers exist regarding the implementation of pay-as-you-throw programs.

6. Written Comments of the Township of Harborcreek

A. Summary of Comment

Individual contracts between the municipalities and its waste/recycling contractor must not be affected in any way.

Response:

Erie County recognizes that municipalities are key players in waste disposal and recycling efforts in Erie County. The County intends to assist municipalities in their efforts but does not intend to interfere with the contractual relationship between the municipalities and its waste/recycling contractors.

B. Summary of Comment

Education on the benefits of recycling should provide details on currently available municipal recycling programs.

Response:

Erie County's focus on education regarding the benefits of recycling will include information about the currently available programs.

C. Summary of Comment

Exhibit 2 regarding Erie County municipal populations should be revised to show a Harborcreek population of 16,267.

Response:

Erie County used the 2000 census figures in generating this chart since it believes that these are the best data that is currently available. For consistency's sake, Erie County intends to rely on the 2000 census data and, therefore, will maintain the current population listing for Harborcreek Township shown in Exhibit 2.

7. Written Comments of Mark Wright

A. Summary of Comment

Erie County should set a higher recycling target beyond the 35% called for by the state.

Response:

Erie County appreciates the writer's suggestion of setting specific "stretch goals" of 40% and 50% for recycling in Erie County. Erie County has yet to achieve the Commonwealth's current goal of a 35% recycling rate. In order to meet and go beyond this goal, Erie County has outlined a number of broad initiatives it intends to pursue to address this issue. One of those initiatives is to hold an annual Act 101 Waste Planning and Recycling Summit. This may be the appropriate forum for evaluating the current status of recycling efforts in the County and setting new goals once the initial 35% target has been achieved.

B. Summary of Comment

It is important to ensure recycling options as part of any Pay-As-You-Throw program.

Response:

As stated in the Plan, the County intends to evaluate existing pay-as-you-throw programs and, where appropriate, promote their use. The County appreciates the information regarding the efforts in Fairview Township.

C. Summary of Comment

The writer expressed concern regarding lack of specifics in the draft Plan and offered a number of specific recycling initiatives.

Response:

In the draft Plan, Erie County discusses multiple initiatives it intends to implement to address waste minimization and recycling efforts in the County. The initiatives discussed in the Plan include improved education and outreach focused on the benefits of recycling, development of recycling programs in southern Erie County, evaluating opportunities for increased organics recycling, development of an annual Act 101 Waste Management and Recycling Summit, focusing on market development for recycled materials, a business contact program to develop better recycling information for businesses and institutions and conducting household hazardous waste and e-cycling events.

In evaluating these initiatives, it is important to keep in mind two critical factors. First, we must acknowledge that Pennsylvania law makes individual municipalities the primary parties responsible for implementing recycling programs. As discussed in the Plan, the County's role is typically one of providing support to the municipalities and engaging in special efforts on broad issues. Efforts to implement detailed specific recycling programs necessarily involve the County partnering with willing municipalities.

Second, waste minimization and recycling efforts are currently not financially self-sustaining and have to be supported by additional funding. Sources of that funding are typically state grants and fees collected by the County on waste disposal. State funding through grants has been an unreliable source of money in recent years. Numerous counties and municipalities have had difficulty in sustaining recycling programs when grant funding has been reduced or eliminated. In developing the approach outlined in the Plan, the County has been cognizant of this issue.

In addition, as part of the effort in putting together this Plan, the County has been negotiating waste disposal agreements with the designated landfills that include County Act 101 implementation fees. The County believes that these fees will be sufficient to support its initiatives, but is hesitant to make detailed commitments without full knowledge of available funds. The County believes that it is important to set out broad initiatives in the areas of recycling and waste minimization in the Plan and then to implement those initiatives in cooperation with the municipalities and citizens of the County based on their desires and interests matched with the available funding. Erie County will review the specific recycling initiatives offered by the writer and may look to implement them in the future.

D. Summary of Comment

Please include a set of guidelines for the County Recycling Coordinator.

Response:

Erie County does not believe that it is appropriate to place those guidelines in this Plan. However, the County does agree that it needs to try and focus the Recycling Coordinator on high-impact projects and provide a mechanism where less time can be spent on paperwork and administrative tasks.

8. Written Comments of Department of Environmental Protection

A. Summary of Comment

The Plan fails to take a critical and progressive look at sustainability, reduction and recovery and ensures that disposal is the priority.

Response:

Erie County disagrees with the Department's assessment of the Plan. Erie County met with DEP to discuss these issues, reviewed information provided by DEP in person and on its website and reviewed numerous other County Plans including those from Butler, Mercer and Crawford Counties to try and glean ideas for inclusion in its Plan. The multiple broad initiatives outlined by the County in its Plan are, in part, based on this information, including the initiatives on waste minimization, pay-as-you-throw and business contact programs.

Furthermore, the County intends to revise the Plan to provide for the implementation of an annual Act 101 Waste Management and Recycling Summit in Erie County. The waste summit would be designed to bring together municipal and County officials, state officials, recycling advocates and the general public to evaluate waste issues in Erie County and to seek consensus regarding appropriate County efforts. The County believes that an annual waste summit in Erie County would be a valuable tool for understanding existing waste disposal/recycling issues and to address the changing landscape in the waste management arena.

The Plan does not focus on ensuring disposal as a priority, however, the County is not free to ignore disposal issues. A legal requirement of the Plan under Act 101 is that it provide for adequate disposal capacity for all waste generated in the County.

B. Summary of Comment

The County has not reached the statewide goal of 35% and the strategies set out should be based on adequate information regarding current recycling efforts such as materials collection, capture rates and contamination levels.

Response:

The County Plan, as written, recognizes that the County has not met the statewide goal for recycling. In developing the draft Plan, the County evaluated the current system including the issues referenced by DEP in its comment. See the discussion on Pages 4-5 of the Plan. This information was developed through the evaluation of the DEP-sponsored studies referenced in the Plan and the work of the Erie County Recycling Coordinator. From this information, the County developed the strategies outlined in the draft Plan that it believes will address the issues identified by the County. Based on the public comment, the County has revised the Plan to add additional initiatives, including addressing organics as suggested by DEP.

C. Summary of Comment

The Plan makes no commitment to investigating or expanding organics collections.

Response:

Erie County recognizes that recycling of organic material is an important issue. The Plan has been revised to address this area.

D. Summary of Comment

Overall recycling program sustainability should be assessed.

Response:

The County agrees that recycling program sustainability is an issue. However, that issue is broader than Erie County and, in fact, involves municipal, state and national issues. As the Plan discusses, one of the strategies which Erie County intends to implement is to focus on market development for recycled materials and sustainable recycling programs using the information generated by the DEP-sponsored report entitled, "Building Financially Sustainable Recycling Programs." Further, it is important to note that regardless of the available recycling infrastructure, state law mandates recycling in certain Erie County municipalities and that the majority of recycled material from Erie County comes from the mandated municipalities. Therefore, it would be a violation of existing state law for recycling programs in those areas to cease as seems to be suggested by the DEP comment.

E. Summary of Comment

DEP requests information regarding how "implementation fees" will be used.

Response:

As stated in the Plan, these fees will be used to offset Erie County's costs in preparing, updating, revising and implementing its state mandated municipal solid waste management plan. Erie County does not believe that the Plan document is the appropriate place to provide detailed budget information and projections covering a 10-year period. However, Erie County has added language to more clearly state that it plans to use these fees in support of its Act 101 waste management obligations.

9. Public Hearing Comments

A. Summary of Comment

Numerous comments were made regarding specific recycling initiatives such as: improve recycling at public events, encourage pay-as-you-throw programs, provide financial incentives for businesses to recycle, promote the use of recycled products by businesses, provide for a construction material exchange, provide more opportunities for tire recycling and encourage a statewide bottle deposit bill.

Response:

Erie County will review a number of the specific initiatives that were proposed by the commentators and where it determines that they are feasible, will pursue efforts to implement these ideas and/or work with the municipalities to address them. As a further effort to address recycling issues raised by the commentators, Erie County intends to hold an annual Erie County Act 101 Waste Management and Recycling Summit that will seek to evaluate and improve these programs in Erie County.

B. Summary of Comment

Anti-littering laws should be enforced and people caught littering should be fined.

Response:

Erie County does not have anti-littering enforcement responsibilities but will pass this comment on to the appropriate parties.

C. Summary of Comment

The County should study the successes and failures of local communities in their recycling efforts.

Response:

Erie County agrees that this is an effort that should be made and intends to do so through the Erie County Recycling Coordinator and by hosting an annual Erie County Act 101 Waste Management and Recycling Summit.

D. Summary of Comment

Erie County should focus more on publicity and education surrounding waste and recycling issues. One commentator suggested that newspapers were a good educational tool.

Response:

Erie County agrees that education and publicity efforts are important tools in addressing waste and recycling issues. The Plan specifically references education and outreach efforts as one of the important strategies that the County will use in seeking to address waste and recycling issues. Erie County will look to all different manners of education and publicity efforts, including using the newspaper, to disseminate important information in this area. Finally, Erie County believes that its proposed annual Erie County Act 101 Waste Management and Recycling Summit will be an important educational and publicity tool.

E. Summary of Comment

The City of Erie should collect all recyclables every week.

Response:

The County will ensure that this comment is brought to the attention of the City.

F. Summary of Comment

Past household hazardous waste and e-cycling events were clearly necessary given the widespread participation and the County should focus on more of these types of events.

Response:

Household hazardous waste collections and e-cycling events are recognized by the County as important efforts and as the type of programs that the County should be actively involved in implementing in the County. Erie County intends

these efforts to be a significant part of the Erie County Recycling Coordinator's responsibilities.

G. Summary of Comment

More than one public hearing should be held.

Response:

The County held one public hearing as required by Act 101. However, in addition to the public hearing, a number of other opportunities were provided for public comment on the draft Plan. These included a 90-day public comment period, posting of the Act 101 Plan Narrative on the County website as suggested at the public hearing, transmittal of the draft Plan to each of the municipalities, the Erie County Public Library and to members of the Act 101 Advisory Committee.

H. Summary of Comment

There were not enough meetings of the Act 101 Advisory Committee.

Response:

Meetings of the Act 101 Advisory Committee were held based on the progress of the Plan. In between Advisory Committee meetings, Committee Members were provided with updates on Plan developments and they were regularly requested to provide any comments they had on Plan development issues.

I. Summary of Comment

The County should do more to promote the use of recycled products by businesses.

Response:

The County agrees that it is important to address the issue of the use of recycled products in order to promote sustainable recycling. The County intends to study these issues and work to promote the use of recycled products. For example, one part of the proposed annual Erie County Act 101 Waste Management and Recycling Summit might focus on available recycled products by inviting exhibitors to promote and demonstrate their products for the attendees.

J. Summary of Comment

Recycling is primarily a municipal responsibility and local control of the issue is important.

Response:

Erie County recognizes that municipalities are the key players in the recycling area as designated by the state law. Erie County looks forward to working with all of the County municipalities to assist in their recycling efforts.

K. Summary of Comment

The cost of recycling to smaller municipalities is the main reason that these communities are not more actively involved in recycling efforts.

Response:

Erie County recognizes that cost issues do play a major role in the level of participation by non-mandated municipalities in the recycling effort. The County intends to work with any interested municipality to implement a cost effective recycling program.

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