

## **Appendix H**

### **Summary of Public Comments Received and Responses**

## **Public Comments Categorized by Topic On the Draft Local Solid Waste Management Plan – Monroe County**

### **General Responses Follow Categorized Comments**

#### **Pay As You Throw (PAYT) Comments**

>As a society people have NO idea how much trash costs. Really. When something is thrown away (let's say, food) it's not just the food that gets tossed. It's the energy it took to grow it, water it, harvest it, haul it, process it, package it, transport it, and cook it. All of that is wasted when food is thrown out. Therefore, I fully support pay-as-you-throw systems. Until people fully realize the cost of throwing something away they will be less motivated to be discerning. It's cheaper not to care than to do the right thing.

>On Page ES-11 and page 102-103, Program Strategy # 12 does not appear to be a definitive action statement, as it only commits to evaluating methods. Is Monroe County going to use the evaluation of methods to encourage Pay as You Throw programs in some way? The discussion of this topic is more a recitation of issues and problems encountered to date and lacks any type of consideration by the County to implement any strategies if effective ones can be found. As undoubtedly Monroe County is aware, PAYT is one of the most effective ways that waste generation can be reduced.

>I fully support a pay as you throw system. The current system requires those who make an effort to divert as much of their waste stream from the landfill as possible to subsidize the cost of others who throw out anything they choose. Further, those trying to behave responsibly are actually financially penalized – i.e. they pay extra for compost, which decreases the materials that their municipality is responsible for (as well as the municipality's costs), thereby further subsidizing their neighbors' waste costs.

>Encouraging the Rochester Mayor and City Council to implement an overhaul of their Environmental Services Division with the goal of enhancing an otherwise dismal recycling rate. Whether it's no container recycling at JazzFest, trucks which were purchased incorrectly (the description of how carts are mishandled at the meeting nearly made me laugh out loud), no volume pricing of MWS (as bad off as Buffalo has been, even they volume price to encourage more recycling).. these and other issues if left unaddressed, will not help the County get to its 60% goal.

>Strategy 12: having been a low-volume customer for quite a number of years, I know first-hand the value of a "PAYT" program. Not only does this incentivize more commodities recycling, it does help save money. To the best of my knowledge, Lilac Disposal, Suburban Disposal, and Waste Management are the only ones offering a low volume program. When one takes into account an aging population as well as more adult persons living alone, the need for this takes on added significance. This is especially true in the City, whose residents pay some of, if not the highest refuse/recycling rates around. Given how bad off they've been, and how badly run their Streets Sanitation Division has been run, even the City of Buffalo has volume pricing in place. I've testified before City Council about this to no avail, so far.

*Response:* Volume-based pricing strategies can be an important incentive for waste reduction and increased recycling when properly implemented. Monroe County has a full mix of waste collection services from private subscription to municipal collection with no appropriate 'one size fits all' pay-as-you-throw (PAYT) / save money and reduce trash (SMART) strategy. In New York State's Sustainable Materials Management Strategy, the state outlines the well-known benefits and perceived detriments of volume-based pricing. It also sets forth objectives to: "Develop additional resources, tools and information for local governments and planning units relating to volume-based pricing (PAYT/SMART) and promote their use. The resources will, at a minimum, outline the basic elements of effective PAYT/SMART programs, highlight varying programs that can be developed to address the unique characteristics of each municipality and planning unit, and provide model policies for easy adaptation." The State also outlines an implementation

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schedule for such assistance. Monroe County's Local Solid Waste Management Plan (LSWMP) Program Strategy #12 reflects the State's focus on a series of programmatic and planning activities instead of mandates and intends to explore the potential resources and tools developed by the State as they become available. As the owner of the Monroe County Recycling Center/ Resource Recovery Facility complex and the Mill Seat Landfill, the County has a vested interest in the implementation and promotion of volume-based pricing strategies and will continue encouraging public and private sector PAYT programs in the interim.

#### **Education**

>Education should be the top priority and provided by those whose priority and commitment is to environmental/sustainability education. And education should reach every stakeholder in the community in language they understand from CEO's to every "man on the street"

>Okay you told us through education in schools and communities we can increase the diversion rate. Well currently there are tons of education opportunities maybe not in schools but within the community that is really accessible and what it really comes down to is most in the community don't care what happens to their trash and don't care to recycle.

> Program Strategy #9 - Thoughts for implementation stage: Utilize neighborhood watches (or groups like that), community centers, schools, and faith communities to communicate and educate county residents on what it is the county wants them to know about recycling and waste diversion.

>Now I know through research and being a young solid waste expert that high diversion rates can be achieved and economic success can be immense with the jobs created and money that can be derived from valuable materials while running a successful landfill. We need a plan to achieve high diversion rates other than what the county has counted on for 20 plus years now by thinking "education "will work because it hasn't.

> There are indeed a number of centers/organizations promoting product re-use. We need greater public awareness of these entities. The county website is one method but there are no doubt others that could be identified.

>How are we going to increase public education?

> I fully support the idea of a sub-committee to increase recycling at county owned/operated facilities. I also recognize that there are staffing issues. There may be an opportunity to enlist volunteer staff to supplement county staff efforts. With proper county staff training of the individuals the recycling message could be carried forward with greater expediency.

>Was the recycling survey conducted in multiple languages? Will the public education (that is to be rolled out) be available in multiple languages?

> #9 is very well written and contains a great number of methods to educate the public as to recycling opportunities above and beyond the traditional paper, cardboard, plastic and metal. Once again, recognizing that staffing may not enable timely implementation of educational programs, I believe enlisting the aid of the volunteer private sector could do so. Of course, the program format would have to be developed/approved in conjunction with county recycling professionals to ensure consistency across the board when presenting information to the public. With all the social media available today I envision a

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multi-media approach to increased/improve recycling/re-use opportunities in Monroe County and it doesn't have to be costly.

>Stakeholder education about recycling and waste reduction should be the responsibility of a group or organization that does not have a direct financial stake in the landfill operations. Assessment/reporting on the effectiveness of the education should be required. Many counties across the US have found success in using a small percentage of their tipping fee revenues to fund an area environmental NGO to provide education and I would encourage the county to consider this approach.

>We encourage the County to consider making stakeholder education the first priority of the plan. Through waste audits conducted annually at RIT, we have found that consumer behavior has the biggest impact on our various waste streams. Changing behavior can be challenging, but it can also have the biggest impact on the county's diversion rates. Targeted stakeholder education for behavior change will likely be the strategy that yields the highest rate of return on the County's investment. This has proven to be the case at RIT.

> The implementation schedule calls for expanding public outreach in the coming years (2016 & beyond), there is no mention of what's being done presently in 2015 other than following up on a grant proposal. I know there is a flyer going out in the water bills, should that and any other plans in place be mentioned in the schedule.

> It's a great idea of a designated person to coordinate and implement plans to increase public outreach. This would allow a focused approach simplifying the best practices to best results process.

>Strategies 5 & 9: the common theme here is Communication - something the County has done a poor job at. Whether it's been TV PSAs that have sent mixed messages; a failure to promote the Western New York Materials Exchange (which has been in existence since 1982), dropping the proverbial ball on promoting "ecopark", not updating the community at large about how their efforts are paying off, or reminding everyone about what to do and how to do it.. in many ways, to go forward, the County is going to have to take a step backwards. How to do this?:

1 ). "Mikey & Herb": Artisan Media Studios, a San Diego media & marketing firm created a campaign around two roll-carts (Exhibit C). This is treated as any other product or service being advertised. When I last spoke to one of the creators, he indicated the response has been positive.

2). "Blue Box Bulletin": just as OCRRA puts out a quarterly small newspaper, the County needs to bring this back, with it being made available in all municipal buildings, libraries, community centers, etc. (Exhibit "D").

3). Ad Council: for those items not covered in 1 & 2, enlist this organization for assistance.

4). MAT-EX: the County (as an off & on participant), needs to assist the western New York Materials Exchange in getting their brochures into the same places as listed in #2 above, as well as adding information about this to the County's web site. (Exhibit E)

5). Recycling trailer: rotating this throughout the towns & the City at appropriate public events (farmers markets, July 4ths, etc.)

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6). Bus wraps: as a part of a coordinated campaign, a few RTS busses can be wrapped, which has been done before.

7). Phone books: along with the Frontier Yellow Pages, the County's recycling page should also appear in the Yellowbook.

*Response:* As outlined in the LSWMP, the County has used a variety of strategies in promoting the proper management of solid waste via the 'Three R's' Reduce, Reuse, Recycle—with varying degrees of success. Using a combination of budgeted County funds, grant money and revenue from the recycling program, the County has continually upgraded the mandatory recyclables list with voluntary items requiring the frequent re-education of the public. To accomplish this, the County has aggressively pursued recycling education campaigns and opportunities (mass media, buswraps, water billing inserts, 3rd-4th grade recycling calendars, recycling mascot, public service announcements (PSAs), public outreach, facility tours, summer public library education programming, etc.).

The County has produced new single-stream recycling and ecopark cards/bill stuffers, video PSAs, a recycling center virtual tour and is exploring additional public education opportunities. While Monroe County law and regulation sets the minimum standard of what is source separated and collected for recycling, it does not govern how it is collected or where recyclables are processed. The County owns the Monroe County Recycling Center (MCRC), where approximately 70 percent of County residential curbside recyclables are processed, but does not operate a solid waste/recycling collection entity. Many residents and commercially leased residential properties do not contract with solid waste/recycling collectors that patronize the MCRC. This complicates crafting a detailed 'one size fits all' countywide recycling message and single-stream recycling program promotion. One of the larger locally-owned waste/recycling collectors (that does not patronize the MCRC) continues to collect recyclables dual stream and encourages the placement of plastic bags/product wrap in its curbside recycling bins. These materials are prohibited at MCRC (and most recycling centers) for operational reasons.

The County has reworked its implementation schedule to reflect ongoing activities related to Program Strategy #9 and to more specifically address future goals for public education programs.

**Organics (Food Waste and Yard Waste)**

>Not only advocating for organic composting, both residential and commercial, but creating the opportunities to make it happen. Food waste is a huge issue. Composting can keep it out of the landfill and provide a produce of value. Coordinated efforts with food waste generators (restaurants, for example) to plug them into the services available for collection and beneficial use

>P.52, Epiphergy is no longer a company, but Community Composting is.

>With regards to organics collection, the least expensive option is to focus on (and incentivize) large generators to institute composting programs. For residential generators, back yard composting could be more effectively incentivized if the county offered discounted composting units. In urban areas, static, open pile composting can lead to increased rodent problems. Therefore container systems should be encouraged. Because there is a nontrivial upfront cost, the county should consider offering rebates or discounts on preapproved composting units in addition to education.

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>Zero landfill initiatives are becoming commonplace, particularly in the manufacturing sector. We encourage Monroe County to place a greater emphasis on expanding diversion options, in order to be more attractive to businesses that are considering locating in or around the county. Encouraging private sector investment in expanding outlets for new commodities such as organics, while important, will continue to have limited impact, without county leadership and resource commitments.

> At 25 percent of MSW being organics (County-Wide Residential MSW Composition, pg. 73), focusing on Yard Waste Composting (19 percent) would be a highly effective way to make substantial landfill reductions, and piggybacking Food Waste composting (6 percent) would be a natural fit for further reduction improvement.

>Strategies 6 & 7: the proper collection of all yard waste for the creation of mulch & compost is an issue for virtually every municipality in the County, with a couple of exceptions. Consequently, in order to increase the amount of this material that otherwise is being landfilled; a more coordinated approach needs to be adopted. This should include:

- 1). A County-wide ban on traditional plastic trash/contractor bags for the collection of all organics, unless they are compostable.
- 2). A County-wide ban on the use of plastic bags for the collection of Christmas trees.
- 3). Encouraging retailers (as was successfully done in Greece) to carry paper yard waste bags if they're not already doing so.
- 4). Encourage Waste Management to establish a yard waste area at the Mill Seat Landfill, just as they already have at High Acres.
- 5). Encourage those commercial entities that generate food waste to invest in food digesters. (exhibit F)
- 6). In crafting a comprehensive yard waste strategy, all municipalities need to be involved, as well as the commercial haulers - both of which weren't the case in 1993, when yard waste was last addressed by the County (nothing like being up-to-date). (exhibit G)
- 7). Encouraging residents to either retrofit or replace their lawnmowers with mowers that mulch the clippings, so they're not landfilled.
- 8). With an increased amount of yard waste source separated, the County could bag & sell the finished product as has been done by the southeast Public Service Authority in Virginia, or by OCRRA in Onondaga County. (exhibit H)
- 9). Just as the County needs to do a better job reminding residents to rinse out all jars & cans, residents also need to be reminded to rinse out all flower & plant containers from nurseries prior to recycling.

Response: The County recognizes the importance of organic materials management in its long-term goals for solid waste diversion and (as the plan outlines) intends to make more active efforts to promote the proper management of yard waste and other organics including commercial/institutional food waste. While the County does not have the ability to collect organic

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material, it does, via intermunicipal agreement, compost Rochester's annual leaf collection material and also promotes private subscription food waste collection.

During the planning period, the County will focus on honing yard waste management programs—the “low hanging fruit” of organic waste management with an already in-place landfill ban, collection element and outlets/end markets. By organizing a public/private coalition of yard waste entities, the County hopes to increase public awareness of, and participation in, proper yard waste management activities via home composting, public collection and private subscription (where municipal collection programs are lacking). The County will additionally continue to promote fat, oil, and grease diversion (via the ecopark and private programs) and increased paper diversion (via recycling).

Inroads for the diversion of institutional/commercial food waste are slowly taking shape in the greater Monroe County area with local private food waste hauling/composting companies operating and managing certain food wastes for local institutions. The County will monitor these programs and promote their successes while gaining knowledge from their challenges. During the planning period, the County plans to put this knowledge and these resources to use at its own facilities (college, jails, airport, hospital, etc.) as appropriate and continually promote the importance of home food/yard waste composting.

### **Solid Waste/Recycling Law Update and Enforcement**

>Monroe County also says that its Mandatory to recycle but we all knew if that were true there would be a penalty for not recycling and a higher overall Diversion rate. I have worked on the back of a trash truck the past two summers for the village of Hilton and I can tell you that not a lot of people recycle, actually there is quite a few that don't. I also know of quite a few people that don't recycle and they tell me that they don't care and to just throw it all in the same place.

>I would like to see mandatory recycling of all clean paper and recyclable containers in businesses, institutions, and industries - not voluntarily or only in food preparation areas. That was not clear to me if that is a goal. Currently only cardboard and high-grade office paper along with containers generated in food preparation areas are required to be recycled.

>What we need is a plan that includes updated legislation that includes both penalty and consequences on the residents, businesses, schools, hospitals, and apartments that don't recycle. Or put accountability on the haulers that includes penalties and consequences for dumping materials that shouldn't be going to the landfills. This can be done in an inexpensive way by having haulers give warnings to customers and eventually resulting in a write up, and fine to the customer or resident which will go to the county. This gives incentive to customers and residents because expensive fines for not recycling will make profit for the county in the short run and in the long run even if the number of fines go down as the profit made from the additional materials will be just as high. It's also an incentive for the haulers because their hauling and disposal fees will go down in the future as well.

>Recycling is not a hard concept or task especially since the new single stream recycling system went into effect. What we need is a plan beyond education to increase diversion rate. Through legislation with penalty and consequence or changing the system in which we process waste before it reaches a landfill we need to figure out this long term solid waste plan problem to achieve a 60 percent or even higher diversion rate.

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>The Monroe County Law should make recycling mandatory for the following: Public and Private festivals, C&D, County buildings, Landlords. Do updates to the Recycling Law include updates to ways in which the law will be enforced? If so, what are those methods?

>Identifying and speaking with all area merchants (large & small) who currently aren't engaged in recycling activities, or are not properly placing materials out for recycling - about the need to do so. This would apply to offices and other such institutions.

> Strategy 2 and 13 are interconnected, local laws need to reflect the demand for better reporting of MSW and recycling material flows, for sound planning and best practices to be utilized.

*Response:* Monroe County Local No. 3 of 1991 (Solid Waste Reuse and Recycling Law) and its associated regulations have not been modified to fully keep pace with current solid waste management practices. However, they do provide the sturdy framework on which local municipal ordinances/codes were crafted and allow for the minimum standards for the required source separation of recyclable material at the curbside (and by businesses) and its collection and delivery to authorized recycling facilities. It provides guidelines to waste/recycling collectors for handling customers that commingle solid waste with recyclables and prohibits the commingling of the materials by collectors. The law and regulations (available on the County website) allow for the enforcement of these requirements (as do local codes) and, while individual households are generally not reported for violations, violation reports by businesses, apartment complexes and collectors are regularly received, investigated and (if necessary) corrected.

It is a Program Strategy for this planning period to revise the law/regulations to reflect current practice and make additions/deletions in keeping with the goals of this plan.

### **Public Event Recycling**

>The County can easily advance public recycling efforts by mandating that any organization that receives county funding (whether sponsorship for a single event or regular financial support) must have a recycling program in place. State and federal funds often have such types of stipulations tied to their funding. Given the number of festivals that occur in this county, it is a missed opportunity for public education that recycling is not required and highly visible.

>I am looking forward to seeing recycling containers at public events, as I have not seen them before!

*Response:* The County has had much success and failure with public event recycling over the last two (2) decades and continues to see recycling prevalent at most festivals/events at Monroe County parks, and County-operated venues such as Frontier Field and the Greater Rochester International Airport. Prior to the 'Better Bottle Bill,' the County also partnered with radio stations and festival organizers to provide and promote public event recycling containers (created or grant-funded) to 'open street festivals' (Park Ave Fest, Brockport Summer Arts Festival, Fairport Canal Days, Rochester St. Patrick's Day Parade, etc.). The Better Bottle Bill has either allowed festival organizers to make public event recycling a fundraising/educational opportunity for organizations or consolidated deposit containers for non-organized collection leaving only contaminated recycling receptacles behind. The County continues to provide public event recycling equipment for several more restrictive venues (airshow, Buffalo Bills Camp, etc.) with a greater degree of success and to street festivals (such as Greentopia) that have a public education component.

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The County will study a public event component to the solid waste/recycling law/regulations during their revision process.

#### **Construction and Demolition Debris & Hard to Process Items**

>Opening and maintaining communications with the following groups: American Institute of Architects (AIA)-Rochester Chapter, Rochester Home Builders Association (RHBA), Better Contractors Bureau (BCB), All area commercial property developers, All area C&D processors. The purpose; to educate all of these parties of the need to source separate as much C&D material as possible for recycling & or reuse.

> As part of the permitting process for demolition/deconstruction established contractors should be given a specification for properly segregating demolition debris. They no doubt segregate materials such as metals that have re-sale value and they should be able to extend the segregation process to C& D materials.

>If there are gaps in terms of the C&D materials currently being processed, consider reaching out to Taylor Recycling about opening a facility in the County, which would service all of western N.Y. (exhibit B).

>"Hard to Process Items" (HTPI): along with the other items considered in proposed Plan, the following items also need to be addressed as a part of the County's 60% goal:

- 1). Glass: as this was discussed at the public meeting, I've enclosed information about a local firm who could be another outlet for this material, as well as a chart outlining the various uses for glass the County needs to pursue. (exhibit J)
- 2). Carpeting: whether the County processes this itself or partners with an outside firm, the aftermarkets exist for this. (exhibit K)
- 3). Mattresses/Boxsprings: whether the County processes these items itself or outsources this work, there are post-consumer uses for the component parts. (exhibit L)
- 4). Ceiling tiles: Armstrong World Industries has and continues to collect these for reprocessing. (exhibit M)
- 5). Toilets/old bathtubs: the porcelain captured can be used for new sidewalks, curbing, and gutters, as the enclosed article points out. (exhibit N)
- 6). Styrofoam (EPS): enclosed are a couple of units the County could obtain in order to finally process this material which, from observation, people still put into their recycling bins. Commercial businesses are also looking for a home for this material as well. (exhibit O)
- 7). Asphalt shingles: with Minnesota's weather conditions are a bit harsher than ours, if using this material for roadwork can work there, it should work here, with more recent data on its success probably available. (exhibit P)

If additional space is available at Avion Drive, that could be used for a drop off location. If that conflicts with the residential drop-off, (it's) all the more reason for that to be re-located to a more centrally located & visible site.

Response: During the planning period, the County will be reaching out to construction and demolition debris management entities during the process of addressing Program Strategy #s 4 and 12. The County will continue to look for ways to improve services at the ecopark facility, which may include more opportunities for C&D debris recycling.

#### **Public Meeting**

>I attended the LSWMP meeting the other night and spoke with you personally before the meeting and discussed various topics. I was really disappointed to see the turn out by the community as it was not well attended in my opinion and proves how little most within the county really care about the problem with

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solid waste within Monroe County. I also believe the event which was a public informational meeting was poorly advertised by the county as I believe more residents may have showed up if they had known about this event.

>Despite being inconveniently located and starting unnecessarily late, I nonetheless found the public information meeting on the LSWMP to be quite informative. While I also believe many of the program strategies should have already been implemented, I'm pleased that the County is willing to take a more pro-active approach to this most important arena.

Response: The public information meeting was organized, advertised and conducted similar to other public meetings and held in a centrally-located and handicapped-accessible venue with sensitivity to general working hours and no-cost, ample parking.

### **Order of Strategies**

>The first strategy listed in the plan is expansion of Mill Seat landfill. While likely necessary, this should be considered the lowest priority and presented in the plan as the last resort. The first priority should be education with an emphasis on reduction of waste generation and proper recycling to divert more materials from the landfill.

>In 2010 the State of New York shifted its approach to waste from an “end of pipe” issue to a more holistic management strategy with the release of “Beyond Waste: A Sustainable Materials Management Strategy for New York State”. The US Environmental Protection Agency has been advocating for this type of systematic approach for almost a decade. The first program strategy detailed in the SWMP includes an expansion of Mill Seat Landfill. Ensuring there is sufficient landfill capacity within the county is clearly a necessary element of the plan. However, listing it as the first strategy is inconsistent with State and Federal plans and suggests that is it the top priority. We therefore encourage the county to consider reorganizing the program strategies in order of priority as listed in New York State’s plan.

>I also believe that it’s great that the county is working on extending the current spot of Monroe counties main disposal site of waste in Mill Seat Landfill as I think this is vital going into the future as no matter how high the diversion rate is there will always be waste that needs to be disposed of properly, hopefully in smaller amounts going into the future.

Response: As was stated prior to, and at the beginning of, the public meeting, the numbered order of Program Strategies listed in the Monroe County Local Solid Waste Management Plan is in no way reflective of the priority of the elements therein.

### **Data Gathering / Further Study**

>A number of the strategies in the plan are dependent upon the use of surveys to gather additional data. Most organizations receive dozens of survey requests annually, each of which is time consuming to fill in. If stakeholders do not see a direct benefit to their organizations in participating in the survey they will be less likely to participate. The same amount of data, and likely more, could be acquired through the creation of a stakeholder subcommittee of the RAC with representation from all of the major generators, including institutions, manufacturers, hospitals and schools. If the generators are involved in the planning process they will be far more likely to provide data for the county reports. Large generators are far more attuned to the challenges and opportunities available to them within the materials management sector. Further, this type of engagement could reveal opportunities for collaboration and improve the region’s ability to compete for state funding for materials management related projects. In the instances where surveys are necessary, we encourage the county to consider partnering with area schools to conduct the research. This will enable the county to provide an additional educational opportunity for its stakeholders.

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As surveys can be time consuming to administer and analyze, having classes oversee the surveys could also enable County staff to focus on other priorities.

>Every action item appears to be “further study”, with few actionable implementation items that will result in tangible reductions. There are significant costs to hire consultants to conduct studies and they are very often never used. Large generators have likely already conducted studies internally and will be in a better position to guide the county’s efforts. For those data points that cannot be acquired through stakeholder engagement, studies could be conducted in partnership with area schools to offer learning opportunities for students. A) The expenditures that would otherwise have gone to consultants could then be better used in providing comprehensive education programs. B) Use an unbiased 3rd party to conduct any surveys/studies that are absolutely necessary. Results from surveys conducted by parties that have an interest in the outcome of the survey are less trustworthy.

*Response:* The gathering of information/data, and its study, is an important part of the goal progressions outlined in this local solid waste management plan. It is also recognized that these efforts can be cumbersome, biased and inaccurate by nature and are never undertaken lightly or without regard to cost. Almost all of the County’s most effective solid waste management programs (all-clean paper recycling, expanded plastics and metal recycling, pharmaceutical collections, leachate conveyance and treatment, biosolids management, the ecopark facility, single-stream recycling, etc.) came after extensive periods of “further study” (useful surveys, existing program studies, data collection, etc.). The County also recognizes that some of its programs were less effective or failed due to insufficient study or relying on technologies that were too cutting-edge (Resource Recovery Facility, Chet the Cheetah recycling outreach). Being able to advance cost-effective and forward-thinking environmental programs with minimum taxpayer risk is always a fine balance.

### **Single (Uncategorized) Comments & Minor Corrections**

Single-Stream -- >I am also glad to see that Monroe County has switched over to single stream recycling and that there is a very low residual waste amount that is produced since the switch.

> All good stuff... I did see an interesting article in D & C ... Doubling of recycling and components of plan not going to work until patrons have two (2) big totes... one single (stream) and one refuse.... might be an issue for the committee.

*Response:* Comments noted.

ecopark -- >I was also glad and still am today to see the Eco Park open and operational as a site that can take and recycle hard to recycle items such as bulky plastics, Styrofoam, and e-waste.

> In his introduction to the presentation of the LSWMP on January 8th, at ecopark, Mike Garland expressed excitement as to the plan developed/presented by Barton & Loguidice. I share that excitement. I believe Monroe County has been a leader in recycling development and related matters; e.g., pharmaceutical waste disposal, electronics recycling. Implementation of this plan with constant monitoring and follow-up will enable Monroe County to continue to be in the forefront.

*Response:* Comments noted.

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Lack of Coherent Plan -- >The problem with the overall “plan” presented the other night in my opinion and others opinion is there really is no plan. What we saw is the county has and will continue to own and have partnered relationships with other companies in the transfer station, recycling center, Eco Park, and Mill seat Landfill which is all great. We also got to see what the diversion rate currently is with a hypothesized number since it’s hard with lack of data to actually see what it could be. You also showed us the amount of waste produced in the different waste streams. Along with what the county would like the diversion rate to be in 10 years. What we did not get is the plan to get to that point.

Response: The County understands that while the diversion goals of its LSWMP are lofty, the plan can help achieve them through its Program Strategies along with the necessary assistance of local municipalities, the NYSDEC, private waste collectors, private facility owners and the County’s private solid waste/recycling partners. Concentration on easier attained diversion candidates that have high landfill presence with preexisting and underutilized collection avenues and valid end-markets (yard waste, paper, plastic bags and product wrap, clothing, etc.) with educational and organizational assistance is an important part of the framework. A revision of the County’s Solid Waste Reuse and Recycling Law and Regulations and better data collection will be positive steps toward assessing the items with few current collection options and emerging end-markets while providing the flexibility to improve existing programs as opportunities arise.

Dirty MRF -- >Another option for the county which would prove more costly would be to open a “dirty MRF” (materials recovery facility). Along with a clean MRF that takes in the regular curbside recyclables, a dirty MRF would take in all the other waste which would then go through a series of sorters including a trommel which will rip open bags and other materials. Then go through a series of optical sorters, screens, disks, magnets, manual sorters, etc. to extract yard waste, food waste, wood waste, metals, Fibers (paper/cardboard), plastics, glass, and other materials to reduce the amount we send to the landfill and increase the diversion rate. A company that specializes in this equipment is BHS (Bulk Handling Systems). Once again this option would be the more costly option but in the long run again it would prove to be profitable and great for economic success. There are many studies and proven success by going to either of these systems around the country.

Response: The dirty municipal recycling facility concept was unsuccessfully piloted by Monroe County at its Resource Recovery Facility in the 1980s and, while the processes at such facilities have advanced with time and technology, the County has chosen to make significant investment in the MCRC. Emerging technologies for solid waste management (many of which are highlighted in Chapter 5) are continually evaluated.

Funding -- >Who is funding the 14 program strategies?

Response: As has been the case with the original solid waste management plan, a combination of funding sources (public, private, grant, solid waste/recycling revenue, etc.) will be used as necessary.

Definition -- >Is the definition of ‘disposal’ synonymous with landfilling?

Response: While disposal and landfilling are not defined terms in the plan, disposal of an unwanted material generally means it will be placed in a landfill. There are also, of course, many exceptions to that broad categorization.

## Public Comments Categorized by Topic On the Draft Local Solid Waste Management Plan – Monroe County

### General Responses Follow Categorized Comments

Reduce -- >How does this overall plan promote waste reduction?

*Response:* Waste reduction, sometimes called waste minimization, is simply creating less waste. It's shrinking the amount we throw out through changes in the design, manufacture, packaging or use of a product -- and using fewer toxics. Source reduction also includes reusing or extending the life of products and packaging. Program Strategy #11 (Product Stewardship Framework) specifically addresses ongoing efforts toward producer waste reduction.

Inter-County Partnerships -- >On Page 3, Table 1-1's discussion of effects of Opportunities or Impacts to Implement the LSWMP from Ontario County is confusing to us. Is Monroe County aware of recycling that is generated in Monroe County that is being handled at the Ontario County Material Recycling Center operated by Casella? Ontario County is well aware that some private haulers serving portions of Ontario County and at least one municipal transfer station sends MSW and recyclables to High Acres Landfill in Monroe County. In regard to opportunities, has Monroe County considered partnerships with adjoining counties in regard to handling hard to recycle materials? In reviewing the list of materials handled at ecopark it seems like there is a great opportunity to provide a regional resource and collaborate with adjoining counties that could reduce costs for all involved counties.

*Response:* Monroe County knows that a portion of residential, commercial, industrial and institutional recyclables generated within its boundaries is processed elsewhere. It has been a continuing member of Genesee, Livingston and Wyoming (GLoW) counties' materials exchange (MAT-EX) program. A portion of the County's fee-based conditionally exempt small quantity generator chemical waste disposal program comes from out-of-county businesses/institutions/not-for-profits and out-of-county residents are able to take advantage of the household hazardous waste program for a fee. Almost all other ecopark-accepted items have more local recycling alternatives (use of which by residents is heavily encouraged by the facility's Locator search tool).

Agricultural Plastics and Agricultural Data Questions -- >On Page 25, Section 1.5 mentions that the number of operating farms within the Planning Unit has decreased since 1988. While a credible data source is cited, data is not presented that evaluates either the magnitude of that change or whether the residual number and type of farms is a significant source of agricultural plastics. Since 1988 the amount of agricultural plastics used on farms has skyrocketed, they are no longer used for containers but for bagging feed, bagging hay, covers for bunker silos, plant bedding, and greenhouse sheeting, to name a few. Thus, it may very well be true that while the number of farms has decreased, the quantity of agricultural plastics used and then discarded within Monroe County has increased. Ontario County and other counties surrounding Monroe have significantly more active farms and issues with agricultural plastics. Agricultural sheet plastics present special challenges, many of which revolve around collecting a large enough weight of material to market. This is another area where collaboration with neighboring planning units may provide an opportunity to improve the success rate each unit has in improving recycling of agricultural plastics.

*Response:* Monroe County is interested in the progress of Cornell Waste Management Institute's (CWMI) Recycling of Agricultural Plastics Program (RAPP) and (via its RRF complex contract operator) encouraged a similar program for boat wrap plastic (ultimately unsuccessful). As noted, material tonnage is one of many challenges for these programs that will hopefully be overcome as time and recycling technologies advance.

## **Public Comments Categorized by Topic On the Draft Local Solid Waste Management Plan – Monroe County**

### **General Responses Follow Categorized Comments**

In-Monroe County Disposal Capacity -- >On Page 29, information is presented on the average daily amount of Municipal Solid Waste permitted at Mill Seat Landfill. At the same time, no such information is provided for the other MSW landfill operating within the County, High Acres. Since the landfilling of waste is one of the components of the County's Draft Plan, I would suggest that the plan should discuss and consider the combined capacity of both of these facilities and state whether sufficient capacity exists to meet Monroe County's demand during the planning period. A casual review of the approved volume capacity of these two facilities certainly implies they are sufficient to meet demand and indeed meet regional MSW disposal needs. My point here is that the analysis doesn't come right out and document that fact.

> Secondly, corporations are looking for ways to reduce their landfill footprint for environmental reasons. Why then is Monroe County expanding our landfill footprint?

*Response:* By continuing to provide Disposal Capacity at the Mill Seat Landfill, the County will be able to continue to provide environmental and disposal cost security to the community. The County's ownership and control of its long term environmental infrastructure, which includes the Mill Seat Landfill and its WWTFs, is critical to support a high quality of life and economic development in the County. If additional Disposal Capacity is not provided by the County, then it would be subject to the inherent unreliability and unpredictability associated with a reliance upon others for waste disposal. Tipping fees charged by others would be subject to market fluctuations and the County, and County residents and businesses, would be subject to the variability of the market should the County not provide a secure cost efficient long term disposal option.

Table 2-3 Inaccuracy -- >On Page 31, Table 2-3 is not accurate as to the current permit status at the Ontario County Landfill. On July 22, 2014 the New York State Department of Environmental Conservation issued a renewal of the County's existing 360 Permit, effective 1/21/2015 through 1/20/2025. In addition, the facility address is 3555 County Road 49, Stanley, NY 14561 in the Town of Seneca.

*Response:* Table edited.

Page ES 6 Correction -- >I just reviewed your plan that you sent me and there is one error in it that you should be aware of. On Page ES 6, under the bullet Town, Village and School District Yard Waste Composting Facilities – You have the Village of Churchville contracting with private haulers for curbside collection. I believe that they do their own pick up with Village crews.

*Response:* The bullet on Page ES-6 refers to towns, villages, and school districts that own and operate yard waste composting facilities; however, the paragraph following this bullet refers to curbside collection of solid waste and recycling. The Village of Churchville does not collect solid waste and recycling materials with municipal crews and trucks and instead utilize WMNY as their service provider for these types of materials (as referenced in Table 1-2). The Village of Churchville does conduct municipal pick up of yard waste with their crews and trucks, which is detailed in Table 2-9.

Glass Recycling Greenwashing -- >The Federal Trade Commission (FTC) has increased its legal actions against "green washing" claims per the FTC Green Guides. This has increased the importance of accurate and transparent information on waste streams and recycling for producers and consumers. According to the guides a product or package cannot be considered recyclable unless it can be used "in

**Public Comments Categorized by Topic  
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manufacturing or assembling another item.” While we understand that the glass market has changed, the county’s current practice of crushing glass and using it as daily cover at the landfill, while claiming it is “recycled” maybe interpreted as “deceptive” according to the FTC. Any company or organization utilizing the county’s recycling stream that is making any landfill diversion claims could be subject to FTC legal action.

*Response:* The County lists glass bottles, jugs and jars as ‘accepted’ from its waste /recycling collector customers for recycling/recovery at the Monroe County Recycling Center. Until recently, most of this material was recycled. The closure of a regional glass market, however, makes the collection of this material for uses other than engineering applications currently untenable. The NYSDEC in *Beyond Waste* recognizes the issues related to glass recycling and markets (Section 8.3.8 and 8.3.10). Market development is the responsibility of Empire State Development (ESD) which has staff working to develop and expand glass markets; it is aware of the barriers to community recycling and has targeted efforts toward alternative applications that do not require costly sorting or cleaning. The use of glass in civil engineering applications is discussed in Section 8.3.10 and in the recommendation (8.3.14 (a)) to “Encourage local use of processed, mixed glass, chipped tires, and other appropriate recycled materials in engineering applications.”

The County is not marketing a product (which would fall under the FTC’s Green Guides) nor is it being deceptive in its outreach regarding the glass recovery process at the MCRC.

Meeting Statement Inaccuracy on Recycling’s Beginnings -- >Recycling’s beginnings: it was stated that this began in 1991, when in fact it began in 1988. Residents of Irondequoit have been recycling since 1970, except for the period 1986-1988 (the end of the Town’s drop off site, due to Owens-Illinois closing a glass facility, and the beginning of “The Blue Box Program” at curbside.) (Exhibit A)

*Response:* The origins of the County’s formal curbside recycling program began with the passage of Monroe County Local Law #3 of 1991 (Solid Waste Reuse and Recycling Law).

Waste Hauler Group Communications -- >Opening & maintaining an on-going dialog with all current and future waste haulers operating in the County (at the moment a challenge as there isn’t a viable waste haulers association).

*Response:* While it is true that communication with waste/recycling collectors is not formalized within an existing organization, collectors are welcome at all meetings of the Monroe County Recycling Advisory Committee and represented by a member thereof. Communications with the public and private collection entities which patronize the MCRC/RRF/Transfer Station complex—which collect from approximately 70% of County households—are regular and productive.

Flow Control -- >I kind of thought that the Oneida-Herkimer settled the idea of flow control. The free market should dictate final disposal/processing takes place. Proactivity on the other case where strategies should yield the enhanced diversion the County is looking for.

*Response:* Comment noted.

Grants & Public/Private Partnership Funding -- >As for costs, public-private partnerships, as well as state, federal, and private sector grants need to be the job of the County’s grant writer - presuming there is one.

*Response:* Comment noted.

**Public Comments Categorized by Topic  
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Waste-to-Energy--> Based on our research and experience here at Diamond, I believe that EFW (Energy from Waste) is a significant missing component in the Monroe County SWMP. If even cursory investigation is done, the experience in northern European countries and even in Lancaster County, Pennsylvania will show a balanced approach to waste should include EFW. Lancaster County Solid Waste Authority owns: 1 recycling center, 1 landfill, and 2 EFW facilities. The EFW facilities enabled them to extend the life of their landfill by 15-20 years with no landfill expansion. The energy produced is used to power homes in the county.

Response: Chapter 5 – Alternative Technology Evaluation addresses waste-to-energy facilities under Section 5.1, Disposal Technology Options ‘Waste-to-Energy (Combustion/Incineration).’ The incorporation of new technologies (on an individual basis) will be evaluated for local feasibility and cost effectiveness during this planning period depending upon staff and resource availability.