Washington Citizens for Resource Conservation

February 4, 2010

2009 Draft Solid Waste Plan Comments
King County Solid Waste Division
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Seattle, WA 98104-3855

Thank you for this opportunity to comment on King County's Draft Comprehensive Solid Waste Management Plan. Washington Citizens for Resource Conservation (WCRC) supports the strong waste reduction, recycling, and product stewardship programs outlined in this plan.

Support

We want to express particular support for the following aspects of the plan:

- Inclusion of waste prevention and waste disposal goals, especially the significant per capita residential waste prevention goal.
- The progressive and achievable goals of 55% recycling by 2015 and 70% recycling by 2020, along with the range of important recommendations (listed in the Waste Prevention & Recycling and Collection & Processing sections) for reaching the 2015 goal in this planning period.
- The product stewardship policy (WPR-4) and related recommendations (#4 and #5). We appreciate the Plan's reflection of the role that product stewardship can play in the future of solid waste.
- The policies to work with regional partners to find the highest value end uses for recycled materials (WRP-5) and to strive to ensure that materials are handled and processed using methods that are protective of human health and the environment (WPR-6).
- The solid waste system planning policies to incorporate principles of equity and social justice into solid waste system planning (PL-5) and consider climate change impacts (PL-6)
- Inclusion of the landfill management and solid waste disposal policy to maximize the capacity and lifespan of the Cedar Hills Regional Landfill, subject to environmental constraints, relative costs to operate, and stakeholder interests. (DS-2)

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Problem

WCRC is concerned about the proposal to shift from considering waste export to an out-of-country landfill when Cedar Hills Landfill closes to also considering waste-to-energy incineration to handle all the county's waste. We agree that it is worthwhile to monitor and consider emerging technologies for targeted portions of the waste stream. For example, anaerobic digestion looks to be an extremely promising technology for wet, non-woody organics such as food waste and animal manures, and should be pursued. However, incineration of the entire waste stream at a waste-to-energy facility is problematic for the following reasons:

- A "put or pay" contract that requires King County to deliver a certain amount of solid waste to the facility could **compete with or undermine waste reduction and recycling**. Once a facility is built, it would need to be fed.
- We are concerned about **toxic emissions** from incinerators, including highly toxic dioxins and furans that are well known for their toxic impact on human health and the environment. As pollution control devices are improved, the toxics can shift from being emitted into the air to being in the ash. They don't go away.
- **Incinerators do not avoid the need for a landfill**. Based on R.W. Beck's June 2007 report entitled "Comparative Evaluation of Waste Export and Conversion Technologies Disposal Options," landfill capacity would be required for disposal of waste that can't be processed, e.g. construction and demolition material, oversized items, etc. (5 to 9% of incoming waste), waste when the conversion facility is down for maintenance, and ash (10% by volume and 25-30% by weight of incoming waste).
- When specific local data is used, **waste export is better from a climate change perspective**. Waste-to-energy technologies emit significant quantities of direct greenhouse gases that contribute to global climate change. In the R.W. Beck report, the conversion technologies were determined to have higher greenhouse gas emissions than the landfill gas technologies. While some national studies show the opposite, those studies typically use data based on landfills without active gas capture systems.
- Proponents of newer waste-to-energy technologies like gasification, pyrolysis, and plasma arc claim they are safe, but similar problems remain.

WCRC believes that there is adequate information – *and concerns* – about waste-to-energy incineration (including mass burn, refuse derived fuel and "advanced thermal recycling") to select waste export to an out-of-county landfill as the preferred disposal option for King County. We do not believe that there is a need for King County to do additional expensive analysis of waste-to-energy technology.

WCRC also submits the following specific comments on the Draft Comp Plan text related to this issue:

- Landfill Management and Solid Waste Disposal Policy #1: As described above, WCRC supports consideration of waste export to an out-of-county landfill. We do not support further consideration of waste-to-energy facilities or other conversion technologies to handle <u>all</u> of the county's waste.

- Page 6-9 states, "Conditions in King County – such as land availability, environmental considerations, public acceptance, cost, and other issues – would make siting a replacement landfill in King County difficult." We think a similar statement should be included in the discussion about conversion technologies. Past experience shows that siting a waste-to-energy facility would be extremely controversial and difficult. It would also likely be costly.
- Page 6-10 lists key conclusions from the RW Beck Report including, "The conversion technologies are slightly more expensive than the waste export disposal option." WCRC does not think that this conclusion accurately reflects the cost analysis in the report, and requests that it be changed. The R.W. Beck report's estimates that most of the conversion technology options are significantly more expensive than waste export. Table 15-2 presents ranges for net present value per ton for each of the disposal options. It indicates that mass burn incineration could either be similar to or up to 23% higher than waste export. Refuse derived fuel incineration and advanced thermal conversion range from 26% to 57% higher than waste export.
- Page 6-13 (paragraph 3) describes three conversion technologies as producing a "manageable amount of ash or residue." This paragraph should state that a landfill will also be required for bypass waste (e.g. construction and demolition debris and oversized items) and for when the incinerator is down for maintenance.
- The term "advanced thermal recycling" used in the draft comprehensive plan is a misnomer. In Washington's solid waste hierarchy, incineration - even with energy recovery - is considered to be a type of disposal. The process described in the report as advanced thermal recycling is <u>not</u> recycling.

Other Specific Comments

- The description of the E-Cycle program (page 1-6) should state, ". . . which implements this recycling service at no cost for Washington residents, small businesses, <u>small</u> ~~local~~ governments, nonprofit organizations, and school districts."
- Waste Prevention and Recycling policies: WCRC recommends that WPR-4 use the phrase "product stewardship" since that is defined in the Plan. It would read: Advocate for <u>product</u> stewardship in the design and management of manufactured products and . . ."
- Waste Prevention and Recycling Summary of Recommendations: #2 refers to helping consumers. The word "consumer" typically means residents. We'd suggest expanding this recommendation to include businesses. It could read: "Provide regional education and incentive programs to help consumers <u>and businesses</u> improve their waste prevention efforts."
- Waste Prevention and Recycling Summary of Recommendations: In #4, we'd suggest the use of the word "products" rather than "materials" so it reads: "Pursue product stewardship strategies through a combination of voluntary and mandatory programs for ~~materials~~ <u>products</u> that contain toxic materials or are difficult and expensive to manage . . ."

- Waste Prevention and Recycling Summary of Recommendations: WCRC would like to see some discussion in the Plan about how the County will work toward highest and best uses for recycled materials that are collected. It should be a County goal for collected materials to be used over and over again, rather than only once before being disposed. This could be included in recommendation #21 and/or in text on page 3-28.
- Page 3-3: WCRC would support a stronger per employee waste prevention goal which is lower than the 58 pounds/week generated in 2007.
- Page 3-4: WCRC suggests that the Division develop a C&D recycling goal.
- Page 3-7: Please consider adding "how to design them" in the first bullet at the bottom of the page: "When manufacturers decide what goods to produce, <u>how to design them</u>, how to produce them, and how to package them."
- Page 3-9: Please consider updating the E-Cycle information in the first paragraph. "<u>In its first year of operation, over 38 million pounds</u> of e-waste was received at take-back locations across the state of Washington."
- Page 3-10: In paragraph 2, it would be useful to know what percent of households are currently using the curbside collection service for collection of yard waste including food scraps. It would be useful to also include this information on page 3-17.
- Page 3-13: In the section entitled "Numerous private-sector facilities," please include information about King County's Take It Back Network for mercury-containing lighting.
- Collection and Processing Summary of Recommendations: Please consider adding the use of incentives in recommendation #9 regarding the recycling of food scraps and food-soiled paper.
- Under Solid Waste Transfer System Policies, WCRC suggests that TR-5 also state that the focus should be on materials that are not easily recyclable at the curb <u>or that are not collected through an available producer- or –retailer provided program.</u> In other words, consideration should be given as to whether the private sector is already providing a program.
- On page 7-9 (last paragraph), we'd suggest deleting "or retailer" in the sentence on product stewardship so that it reads, "Product stewardship shifts the management of materials at the end of their life to the product manufacturer."

Thank you again for this opportunity to comment. As a member of the King County SWAC, I greatly appreciate the staff's attention to and consideration of SWAC's comments, the thoughtful discussions, the improvements made to the draft in response to input, and the staff's overall excellent work on this Plan.

Sincerely,

Suellen Mele

Suellen Mele
Program Director