

## 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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