

# DAAccent...on Solid Waste Issues



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## An Opportunity for Self Analysis

# S.W. Management Planning Requirements



Solid Waste Management Plans (SWMP) are due to the Virginia Department of Environmental Quality (VA-DEQ), by every County, Town and City by July 1, 2004. Comprehensive plans were originally developed in the early 1990's, at a time of sweeping regulatory change. The new Subtitle D disposal regulations were being implemented, and recycling goals were first established. Prior to this time, little was known about recycling rates, a large percentage of Virginia's landfills were unlined, and training for waste management operators was yet to be required. Disposal costs were often in the \$6 - \$12/ton range.

Much has changed over the past decade. Now, all but a small number of facilities are lined, recycling rates are tracked annually, and a new breed of trained professional has been employed to successfully manage these programs. Additionally, disposal options have increased through growth of the commercial sector, and the permitting of new disposal capacity for both commercial and public facilities.

While the environmental performance of waste management has significantly improved over the past decade, the costs have also escalated. Draper Aden Associates' most recent tipping fee survey (to be published Fall 2003) indicates that disposal fees range from \$25 to more than \$60/ton. Hauling costs to regional disposal facilities often raise the lower end of the range so that many localities are now paying \$40/ton and more for MSW waste disposal. Disposal of other wastes, such as sludge, CDD, and industrial wastes remain problematic in some areas.

### **New Plan Requirements:**

Amendment 1 to the Solid Waste Management Planning regulations (9 VAC 20-130-10 et. seq.)

became effective on August 1, 2001. These regulations made several important changes to the original regulations including:

- ❖ The 5-year updates of the original SWMP was replaced by the new plan that is to be amended whenever a solid waste management program is to change.
- ❖ The new plan, and any subsequent amendments (major amendments require public participation; minor amendments are handled administratively), must be approved by the VADEQ.
- ❖ Future permits and amendments to existing permits for solid waste management facilities can be denied unless a plan has been prepared and approved. Enforcement including fines can be assessed for non-compliance with the plan.
- ❖ The 25% recycling goal is now a mandate.

At a minimum, the SWMP must address for a 20-year term the following (abbreviated summary):

- ❖ The integrated waste management hierarchy; in order of decreasing preference: source reduction, reuse, recycling, resource recovery (waste-to-energy), landfilling;
- ❖ Program for plan implementation;
- ❖ Objectives for solid waste management
- ❖ Incremental stages of progress
- ❖ Program costs & funding strategy
- ❖ Public education & involvement

The content of an approvable plan is expected to include existing and projected waste composition; waste generation and flow patterns; collection (residential, business/commercial and industrial); disposal; recycling; public education; and public/private partnerships. They should be complete with detailed construction and implementation schedules, and a funding plan. 81 plans (regions) were submitted in 1991. The regions established at that time can be employed for the new plan, but *given the enforcement provisions of the new regulation, a determination of accountability for participating lo-*

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**calities should be carefully considered and addressed.**

**Recycling Mandate:**

An important element of the plan is the recycling mandate of 25%. The formula for calculating the 25% has been modified, but yields a similar result as the original formula. However, the regulation focuses on household waste recycling, and even though some industrial process recycling was accepted as part of the 25% goal in the past, this component of the recycling equation will be scrutinized carefully when the new plans are submitted. Some localities have relied upon this industrial contribution to meet its 25% goal, and this may not be accepted in the future. **Early assessment of your recycling rate with the VADEQ will be critical to the success or failure of your plan.**



**Full Cost Accounting:**

The process of developing the plan can be viewed in one of two ways. It can be viewed as a mandated exercise to be satisfied with minimal effort and cost. This may be appropriate in cases where the region is satisfied with the direction, cost and service efficiency of its programs. However, it may also be viewed as an opportunity to evaluate the full cost of a waste management program, in comparison to the level of service offered. Some potential benefits of this philosophy include:

- ❖ Establishment of cost-efficient budgets for every element of your program including collection, recycling and disposal.
- ❖ The modification/addition/deletion of specific programs based on economics versus service. Examples would be collection routing, frequency of collection and methods used for recycling, bulky household items, leaf and yard waste, etc.
  - ❖ The evaluation of revenue streams, and collection of revenue. Are available revenue generating methods not being implemented? Can revenues be collected more efficiently? Are rates assessed to fully fund current and anticipated programs?
  - ❖ The establishment of funds for expansion or future needs such as closure, or remediation.
- ❖ The evaluation of regional options not yet discussed with neighboring jurisdictions. This could potentially lead to new and cost-effective opportunities.
- ❖ Development of a comprehensive educational tool which outlines all aspects of solid waste management, current costs and future changes.

These are but a few ideas of ways to take advantage of this opportunity to evaluate your solid waste management programs, and to explore potential new opportunities for cost efficiencies. The planning effort can be used as a tool to achieve this objective.

*Draper Aden Associates is a full-service engineering, surveying and environmental consulting firm. Services include: civil/utilities engineering; environmental services, geological/hydrogeological services; geotechnical/construction/laboratory; site planning & engineering; solid waste management; surveying; subsurface utility engineering, information management services, GIS and transportation engineering.*

