
APPENDIX D

SOLID WASTE AND RECYCLING

COMMITTEE COMMENTS ON DRAFT PLAN

1. SWRAC Comments with City Staff Responses

SWRAC DRAFT PLAN COMMENTS

1. COMMENT PERIOD

The MWMP draft was submitted for review and comment to the City's Solid Waste and Recycling Advisory Committee (SWRAC) members as well as interested parties on the current meeting distribution list on July 20, 2020. Members were given until August 21, 2020 to submit written comments on the plan.

This period of 32 days is consistent with PADEP's public participation requirements for a non-substantial plan update. SWRAC members were also given the opportunity to submit comments and ask questions during the July 23, 2020 regular SWRAC meeting. There were no additional comments submitted after this date.

2. COMMENTS RECEIVED

The comments, along with the Department's responses are detailed below:

- ◆ **Comment:** The draft plan states that "100 percent of residential and illegal dump solid wastes collected by the Streets Department, are either recycled, used as an engineered fuel product (SpecFUEL), or delivered to a waste-to-energy facility." Is there any plan to move away from the landfill disposal with methane recovery followed by methane flared for items that can't be recycled or combustion? What about source reduction and reuse?
 - ◆ **Response:** *The question refers in part to the U.S. EPA's Solid Waste Management Hierarchy, depicted as Figure I-1 in the Plan Introduction. The hierarchy is a prioritized list intended to guide overall approaches to solid waste management. As noted, virtually all non-recyclable solid waste collected by the City's Streets Department is disposed of via waste-to-energy or the SpecFUEL. The only solid wastes from Philadelphia that are landfilled are those generated by commercial and institutional sources which the City does not provide or control collections for.*

- ◆ **Comment:** How are private and commercial buildings able to play a part in this as they seem to make up the larger part of current diversion planning here (aiming for almost 50 percent diversion, versus about 20 percent for residential)?
 - ◆ **Response:** *As noted in Chapter 1, waste from the combined commercial, multi-family and institutional sectors (C/MF/I) comprises more than 70 percent of the total tons generated in the City. The City recognizes that higher recycling and diversion goals can't be achieved without additional materials recovery from the C/MF/I sectors. As referenced in Chapter 4 of this plan, the City has developed technical assistance tools such as the business recycling toolkit and also now requires commercial properties to submit a Commercial Waste Report. Additional details on commercial recycling requirements as well as tools and technical assistance documents can be found here: <https://cleanphl.org/commercialwastereport/>*

- ◆ **Comment:** How accurate have the projections from Delaware Valley Regional Planning Commission (DVRPC) population data and volume for past years been to actual? Have we been able to compare? Many of the projections for use are based on those numbers versus actual.
 - ◆ **Response:** *The DVRPC is the primary source for population estimates for regional jurisdictions. The City will evaluate actual tonnage generation against tonnage forecast as part of its regular solid waste planning efforts.*

- ◆ **Comment:** Section I.5.2 of the MWMP should be updated to acknowledge that the Zero Waste and Litter Cabinet director position and office has been disbanded. Furthermore, the plan should mention

SWRAC DRAFT PLAN COMMENTS

that it has been disbanded and some programs filtered through to the Office of Sustainability. This is only mentioned in the SWRAC meeting summaries in Chapter 13 of the MWMP.

- ◆ **Response:** *The elimination of the ZW&L director position and office occurred after this plan 2019-2028 plan had been substantially completed. The elimination will be referenced in the cover transmittal to PA DEP.*

- ◆ **Comment:** What are the regulations or guidelines around full completion of the Certification of Municipal Waste Disposal Capacity Forms and who we contract with? The following companies replied "No" but are listed as haulers for 2019-beyond despite not certifying that they'll have the space for the City of Philadelphia's waste:

- ◆ Covanta-Plymouth Meeting
- ◆ Covanta Delaware Valley
- ◆ Covanta 58th Street Transfer Station
- ◆ IESI Bethlehem Landfill
- ◆ Western Berks Community Landfill
- ◆ York County Resource Recovery Center

Should the paragraph which references Table 5-2 be updated to include this language: "Based on completed Certification of Municipal Waste Disposal Capacity Forms received in 2015, there are 28 disposal and processing facilities with interest and capacity to accept municipal waste collected privately and originating in Philadelphia. Four have expressed interest but did not complete the certification of capacity."?

- ◆ **Response:** *The City has updated the referenced plan section accordingly.*

- ◆ **Comment:** There isn't a list of Recyclables Processing Facilities for 2018 (I do seem them listed in the facility name list for post-2019 plan) and so it makes this piece of the plan less clear than the solid waste sections--which include facility description and either our tonnage they received in 2018 (and prior) or were capable of receiving but we didn't use). Can we add the facility descriptions for this plan?

- ◆ **Response:** *Recyclables processing facility descriptions are not required per PADEP guidelines. Moreover, these facilities are not required to report annual tonnage amounts to PADEP. Many facilities do report on their recyclables tonnages to the Recycling Office, but many request confidentiality.*

- ◆ **Comment:** Table 4-1 City of Philadelphia Diversion Rate (2007 – 2018) Shouldn't 2018 reflect some type of change if residential recycling was temporarily diverted from households in four sanitation areas to the Covanta Waste-to-Energy facility incinerator for four months? Though it won't look great right now, in the long term you would show that you created a successful plan to bounce back.

- ◆ **Response:** *The residential tonnage total detailed in Table 4-1 actually reflects a 23,000 ton decrease in residential single-stream recyclables that resulted from the temporary diversion of materials. However, that decrease was partially offset by an increase in scrap metal tons reported by private scrap dealers which were attributed to the residential sector.*

- ◆ **Comment:** Plan section 4.11.2 references outreach and programming support provided by Keep Philadelphia Beautiful (KPB). However, the City's contract with KPB was suspended in the spring of 2020 due to budget cuts.

- ◆ **Response:** *The elimination of the KPB funding occurred in mid-2020 after this plan 2019-2028 plan had been substantially completed. The elimination will be referenced in the cover transmittal to PA DEP.*

This page intentionally left blank.