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Larry C. Christley
Manager, Planning and Financial Assistance
State of Tennessee
Department of Environment and Conservation
Division of Solid Waste Management
Nashville, TN

Via Email: Larry.Christley@state.tn.us

CC: chuck.head@state.tn.us

Dear Mr. Christley,

This letter is sent to be part of the record for the Solid Waste Reform Task Force.

I participated in a Task Force meeting by presenting a review of the state of the art and recommendations for the Task Force to Consider. My remarks are summarized in the attachment to this email.

Since the meeting, I have had follow up discussions and information exchanges with several solid waste managers I met at the session. These officials are from urban, small town and rural areas. The feedback I got was a wide consensus on the need for on-going technical assistance in a variety of areas. These include:

Equipment for recycling and composting

Incentives for households and businesses

How haulers can profit from recycling

Processing and markets

Local policy rules for recycling and economic development

State policies in support of local programs

Public Awareness and Education

Case studies.

In response to this feedback, I recommend that the TDEC initiate a technical workshop series to address urban, rural and small town issues with regard to reducing disposal at incineration or landfill facilities in the state. I am available to discuss this issue with you and other officials. ILSR will be a willing participant in this effort, the goal of which is to waste less and recycle and compost more in order to reduce the environmental footprint of the state and increase the number of jobs, small businesses and the local tax base.

For your information, ILSR has a 35-year history in resource management. Please review our record of accomplishments at www.ilsr.org. Most recently, we have worked for the cities of Austin, TX; Los Angeles, CA; Washington, DC; and the Commonwealth of Puerto Rico. In addition, we work with manufacturers who use recycled materials as their primary feedstock.

I am available for any questions you may have.

Sincerely,

Neil Seldman
President

Comments to the Tennessee Solid Waste Reform Task Force, Nashville, TN, 17 April 2008

By Neil Seldman, Institute for Local Self-Reliance, Washington, DC

My name is Neil Seldman. I am president of the Institute for Local Self-Reliance, founded in 1974, based in Washington, DC and Minneapolis, MN. I have been working in the field of recycling and economic development for 35 years. My training for this is as a manufacturer in NYC where I am from, and as a political scientist, trained at the George Washington University in Washington, DC, where I was also a lecturer.

Thank you for the opportunity to address this Task Force. I am here at the request of the grass roots recycling organization, BURNT and the NAACP of Nashville. For the past three days, we have been visiting with many stakeholders in the area. We have met with LT Governor Ramsey, Rep. Tidwell, Dom Majors of Congressman Cooper's office, Mayor Dean and his aide Jim Hester, Buck Dozier of the Fairgrounds, Odell Binkley, industrialist, the board of the NAACP, Senator Kyle, senior planners at Vanderbilt University, teachers and students at the Granberry Elementary School and many citizen

groups at church meetings. All have been extremely interested in our efforts. All have provided excellent feedback on our thinking and how it may apply to Nashville Metro government, households and businesses.

I know that you are well into your discussions on solid waste management reform. My goal today is to suggest that you consider a new path for solid waste management in the state. That path is resource management. The new approach is based on the fact that the materials in the waste stream are extremely valuable and can be the basis for both reducing current solid waste management costs as well as stimulating economic growth through new jobs, new and expanded small businesses and an expanded tax base.

If these materials were recovered through source separation and mechanical separation, the value could reach \$80-100 million annually. This is because the worldwide markets for plastic, glass, metal, paper and other materials are at an all time high. This is due to the fact that half the population of the world - 3 billion of 6 billion people - live in China and India, which are rapidly becoming middle class economies with consumption patterns much like the US and Europe. This drives the price for materials upward. The leading export from US ports is recycled materials.

Recycling and composting in the Nashville Metro region can add from 500-1,000 new jobs in the economy. Each job that is directly created also stimulates another indirect job. Thus, recycling and composting become major considerations for economic planners as well as solid waste planners.

At the same time, by approaching these materials as a source of economic growth, Nashville Metro can reduce its global footprint on the world's environment. By using recycled materials in manufacturing, we reduce energy costs and the pollution caused by extracting trees and ores from nature. Composting also reduces energy, pesticide and water use in agriculture.

All across the US, cities are reaching 40%, 50%, 60% and higher levels of recycling. San Francisco has a 70% rate and a goal of 90% by 2025. All of California reached their mandated 50% goal several years ago. The city of Oakland over the past 10 years of investing in recycling and composting has created over 1,000 new jobs in its local economy. They have done this with methods that are readily available to planners in Nashville Metro.

My organization, ILSR, the California State Integrated Solid Waste Management Board as well as international city climate control agencies have published case studies of urban, suburban and rural best practices in this field. ILSR is available to send copies of our case studies to all Task Force members. Simply contact Bruce Wood of BURNT or me.

IF GOVERNMENT SETS THE POLICIES THAT CREATE THE INCENTIVES TO RECYCLE, THEN BUSINESS INVESTMENT WILL FOLLOW. I like to use the example of a baseball line up to make my point. The first two batters in the line up have

a job to get on base, and then the heavy hitters, 3, 4, and 5 batters take over. I believe that recycling and composting are the same. Once a city/county decide to recycle, then common sense and entrepreneurialism take over.

Leadership is key. In Massachusetts, for example, they have banned Construction and Demolition waste (C and D) from landfills. This stimulated deconstruction of buildings and C and D recycling companies to get started. Yard debris bans in several states have resulted in new composting and mulching activities. In Delaware, this has been critical in solving the poultry industry problems of what to do with waste from that industry. By mixing shredded yard debris in a 1:1 ratio with poultry waste companies have produced highly valuable black top soil valued at between \$50-\$75 per ton.

Electronic waste bans from landfill are accomplishing the same result. Hundreds of new companies have been formed. Bans on landfilling tires has lead to the emergence of a new technology that processes industrial rubber, and tires, into a virgin substitute for manufacturers, at half the price of virgin rubber.

Our philosophy is don't punish people for not recycling; provide incentives that make people want to recycle. The Pay As You Throw system has helped cities and counties reach 50% recycling within one year of implementation. The US EPA has a special web site just for this information with many case studies. I know that Nashville Metro has charter provisions that will make it more difficult to figure out how to implement PAYT, but it can be done. Other systems pay households on the basis of how much they recycle. A family can earn up to \$400 per year in cash/coupons.

Big industry is moving to recycling and composting. Bruce Wood and I estimate, after talking to leading grocery chains in the region, that at least 40,000 lbs of clean vegetative scraps, ideal for composting and methane generation for energy, are available. We will be working with the companies to realize this potential environmental and cash savings.

Ikea and Whole Food companies are switching from plastic bags to reusable canvas bags. Kroger's Stores in the Nashville Metro area, now give away bags with purchase of selected items. Coca Cola and Pepsi are now planning to make all their PET bottles from recycled PET. Other companies are manufacturing an array of industrial and consumer products from old HDPE (milk jugs).

Small business has also emerged. Over 300 deconstruction companies have been started in the last few years. These companies take down buildings piece by piece to preserve valuable building materials and train workers for living wage jobs. For every re-store that sells used building materials, ILSR estimates that a community saves \$250,000 in reduced costs for renovating homes and businesses.

The future of garbage is not what it used to be. Times are changing quickly. I am urging Nashville Metro to identify these trends and apply them to your city and county for environmental and economic gains.

Education is critical both as public awareness and in-school classes. Nashville has the Granberry School that teaches its elementary age students to separate food waste after meals. This material is composted on site. I estimate that it saves the school \$10,000 annually, in reduced waste hauling expenses. In addition, the school uses reusable/rewashable plastic trays. There are 134 other schools in Nashville's public system. Yet, no other school has adopted this successful program (even as the State Corrections System and Disney World have adopted the lessons of Granberry Elementary School. Further, other schools use polystyrene trays that are thrown out after each single use. I cannot understand this. The city is facing layoffs of 200 jobs, yet it has not made the simple change to the Granberry School system which can save over \$1 million annually, plus teach citizens to be recycling/composting literate, which reduces the cost of maintaining these individuals as citizens.

Based on my initial observations, I would make the following recommendations for the Task Force to consider:

- + Keep this task Force operating even after you report to the TDEC. It is important for those officials managing waste throughout the state to meet regularly, share information and insight.
- + Raise the recycling goal from 25% to 50%. In 1991 when the 25% goal was implemented it was a progressive step. But the amendment to the law a few years later which allowed for C and D deposited into landfills to count toward the 25% goal is perverse. It leads to a rapid expansion of C and D landfills in the state from 12 to 80. If C and D were banned from disposal as in MA, the state would have C and D recycling businesses not landfills. The C and D rule should be reversed as soon as possible.
- + Provide technical assistance to cities, counties and businesses. The best way to do this is through successful case studies, which show how to lower the cost of disposal and increase revenue.
- + Emphasize composting. Local industry needs mulch and compost. These are the nursery, grounds keeping, landscaping and gardening industries. Work with farmers to allow them to compost clean organics delivered to their farms.
- + Create industrial zones, or resource recovery parks, especially for recycling and composting businesses and manufacturers that use these materials to make new products. The CA Recycling Market Development Zones are a useful example.
- + Identify best practices in these fields from across the US. Also, build upon the best practices already operating in your area such as the Granberry School and composting enterprises that already exist.
- + Integrate recycling into school curriculum from elementary school through university. Students who learn how to manage solid waste efficiently will never be unemployed.

+ Integrate best practices into the solid waste management planning in the Nashville Metro area. Use all stakeholders---schools, businesses, churches, and civic and environmental groups.

+ Consider a disposal surcharge on all garbage placed in Tennessee's landfills or incinerators. Funds raised can be investment capital for private sector, local government and community projects. I know that this issue has been considered in the past. It should be reconsidered. Sullivan County, TN, has already imposed a surcharge of \$35 per ton. The impacts of this surcharge should be monitored. The surcharge in Alameda County (Oakland) CA has lead to over one thousand jobs in recycling, reuse and composting.

Nashville Metro generates about 1 million tons of materials per year. This could be worth \$100 million annually, if materials are recovered for industry and agriculture. At the same time, the area would save \$30 million in landfill disposal fees.

ILSR, BURNT and the NAACP of Nashville are putting time and energy into planning for a recycling and composting economy for the region. We are available to help planners in Nashville Metro as well as other cities, suburbs and rural areas. We will keep the Task Force informed of all our efforts and accomplishments, as well as barriers that we come across. We will be sharing information with you and also asking you for advice as our work progresses.

I look forward to seeing you soon. I am available for any questions you may have. I will also be pleased to forward technical reports that pertain to your issues in rural, urban and suburban locales.