

**SWANA RECYCLING TECHNICAL ASSISTANCE**

**FINAL REPORT**

**McKEES ROCKS BOROUGH, ALLEGHENY COUNTY**

**ACHIEVING ACT 101 LEAF WASTE COMPLIANCE**



**HARRISBURG, PENNSYLVANIA**

**DECEMBER 2007**

**McKEES ROCKS BOROUGH  
FINAL REPORT  
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## McKEES ROCKS BOROUGH ACHIEVING ACT 101 LEAF WASTE COMPLIANCE - Executive Summary -

McKees Rocks Borough (Borough) is located in Allegheny County, Pennsylvania. The Township is an urban municipality in the Pittsburgh area and has approximately 2,250 single-family households and over 6,600 residents. The Borough was notified by PADEP in the spring of 2007 concerning non-compliance with Act 101 for leaf waste collection. The Borough does not have a curbside leaf waste program now and does not have the staff, equipment and infrastructure to implement a municipal-wide curbside leaf waste collection program. If the Borough fails to meet Act 101 requirements and Act 140 requirements for recycling Performance Grants, it may risk losing future Performance Grants. The Borough was not awarded Performance Grants in recent years and both waste and recycling totals reported by waste management from 2004 – 2006 are below what would be expected for a municipality with over 6,000 residents.

Through technical assistance provided by GF, a recommended strategy has been developed for the Borough to achieve compliance with Act 101 and PADEP policies (refer to Section 4.0). Fundamentally this strategy includes:

- An arrangement with a nearby municipality (e.g. Crafton Borough) that allows McKees Rocks Borough residents to drop-off leaf waste at a compost facility at least one day per month; and
- One spring and one fall curbside collection of leaf waste (i.e. **leaves, garden residues, shrubbery and tree trimmings, and similar material**, but not including **grass clippings**) beginning in the spring of 2008 to be provided by a private hauling company;
- Distribution of public recycling education information once every six months.

It is also recommended the Borough do the following:

- Establish a line-item in the Borough's annual budget (for 2008) to cover leaf waste collection services in an amount of at least **\$10,000** to cover the cost for two annual curbside collections, biodegradable paper bag procurement, administration and related educational efforts. Consider reusable hard plastic containers provided by the household as an alternative to purchasing, selling and distributing Kraft bags for leaf waste.
- Work with nearby Act 101 mandated municipalities and/or with the Char-West COG to cooperatively bid for biodegradable paper leaf waste bags to lower the cost per bag.
- Set up a system at the Borough office for distributing and selling biodegradable leaf waste bags to Borough residents, or confirm use of reusable hard plastic containers provided by residents.
- Require residents via an ordinance to use biodegradable leaf waste collection bags for segregated leaf waste materials that are placed at the curbside, if paper leaf bags are used.
- Upon finalizing the leaf waste program direction, the Borough should update the PADEP response letter that has been drafted by GF (**Appendix C**) and submit it to PADEP as confirmation of its compliance with applicable regulations.
- The Borough should improve Act 101, Section 904 Performance Grant awards by accurately documenting/validating recycling totals, including commercial recycling tons.

# McKees Rocks Borough

## Leaf and Yard Waste Collection Program Evaluation

### 1.0 INTRODUCTION

This Report summarizes technical assistance provided by Gannett Fleming, Inc. (GF) to McKees Rocks Borough (Borough). This project and evaluation was completed for the Borough's leaf and yard waste collection program. This study was performed as part of the Recycling Technical Assistance program sponsored by the Pennsylvania Department of Environmental Protection (PADEP) and the Solid Waste Association of North America (SWANA).

#### 1.1 Scope of Work

GF worked with McKees Rocks Borough to develop the following tasks for this leaf and yard waste collection study.

- Task #1** GF will gather background information from the Borough related to the current residential waste collection system, including contracts and ordinances.
- Task #2** GF will evaluate and provide recommendations to the Borough for implementing a leaf and yard waste collection program that meets Act 101 requirements and PADEP policies.
- Task #3** GF will prepare and provide the Borough with a letter report of findings and recommendations. This task includes a review of the report by the Pennsylvania Department of Environmental Protection (PADEP) and response to PADEP comments. Additionally, an electronic file of the final report will be submitted to PADEP. Both an electronic and hardcopy version of the report will be provided to the Borough.

### 2.0 STUDY BACKGROUND

McKees Rocks Borough is located in Allegheny County, Pennsylvania. The Township has approximately 2,250 single-family households and over 6,600 residents based on the 2000 U.S. Census Bureau. The population is decreasing gradually. The Borough was notified by PADEP in the Spring of 2007 for non-compliance with Act 101 for leaf waste collection. The Borough does not have the staff, equipment and infrastructure to implement a municipal-wide curbside leaf waste collection program. This study is the initial step in identifying an approach that will allow the Borough to implement leaf waste collection program that complies with Act 101 and PADEP policies.

Act 140 of 2006 requires recycling Performance Grant applicants like the Borough that receive over \$10,000 to meet certain recycling performance criteria. If the Borough fails to meet any of these Act 140 requirements, it should use Act 140 monies to satisfy the requirements or risk the loss of future Performance Grants.

### 3.0 EXISTING WASTE COLLECTION AND RECYCLING PROGRAM

#### 3.1 Waste Collection

The Borough has a single-hauler collection contract with Waste Management. This contract includes recycling services and will expire December 31, 2009. In 2007, waste and recyclables were collected once per week at a cost of **\$14.06 per month per household or \$168.72 per year**. Under the current contract, tree trimmings, branches, grass cuttings, weeds, leaves and yard materials must be placed in containers, bags and bundles and limits the length of material to 36 inches and weight of containers and bags to 35 pounds. The contract does not require or define separate/segregated collection of these materials for recycling.

Based on annual reports for municipal waste provided by Waste Management for 2004-2006, the annual municipal waste generated and disposed for the Borough is between **2,600 and 2,800 tons**. These waste totals seem far below the expected waste generation for a municipality with 6,662 residents (Year 2000 US Census). For example, EPA estimates the per capita waste generation rate to be .87 tons per person per year. Using this figure, the Borough should generate **5,796 tons** of municipal waste annually.

#### 3.2 Recycling

The Borough is “mandated” by the Municipal Waste Planning, Recycling and Waste Reduction Act of 1988 (Act 101) to provide curbside recycling services, including the recovery of residential leaf waste. Act 101 defines leaf waste as **leaves, garden residues, shrubbery and tree trimmings, and similar material**, but not including **grass clippings**. The Borough waste contract includes weekly curbside collection of residential recyclables on the same day as trash pick up. Waste Management collects the following recyclables commingled under the current waste and recycling contract:

- **Aluminum Cans**
- **Bi-metallic cans**
- **Clear Glass**
- **Colored Glass**
- **HDPE**
- **Mixed paper (kept separated from commingled recyclables)**

Based on Waste Management’s annual recycling reports to the Borough the following totals were provided for Act 101 residential recyclables. No commercial recycling was reported, and residential recycling totals are very low.

2004 – **106.56 tons** residential recycling  
2005- **81.48 tons** residential recycling  
2006 – **77.2 tons** residential recycling

### 3.2.1 Act 101, Section 904 Recycling Performance Grants

The reported recycling totals are very low for a municipality with over 6,000 residents. GF estimated Act 101, Section 904 Performance Grant awards for 2005 and 2006 in **Appendix D**. For each year the Grant Award is estimated to be less than \$1,000. The Borough should work with Waste Management (Inc.) to ensure accurate waste and recycling reporting and to increase recycling rates. Commercial sector tonnages can greatly increase Performance Grant awards.

### 3.3 Curbside Leaf Waste Collection and Management

The Borough does not currently have a curbside leaf waste collection program in place as required by Act 101 for all mandated recycling communities. In the past, leaf waste management has not been a priority for the Borough because it lies within an urbanized area where asphalt and paving is much more common than large yards and green space. Recent pressure from PADEP concerning leaf waste collection has prompted this study and the Borough to implement a system to meet, at a minimum, the requirements set forth by Act 101 and PADEP.

In May 2007, PADEP's Central Office released a one-page guidance document titled "Pennsylvania's Act 101 Leaf Waste Collection Requirements." This document is attached as **Appendix A**, and as summarized, requires mandated recycling communities including the Borough to:

- 1) establish by ordinance that leaf waste is collected from residences and commercial, municipal and institutional establishments;
- 2) establish a scheduled day, at least once per month, when leaf waste is collected from residences; or
- 3) establish a scheduled day, not less than twice per year and preferably in the spring and fall, when leaf waste is collected from residences, and facilitate a drop-off location or other collection alternative approved by PADEP that allows persons in the municipality to deposit leaf waste for the purposes of composting or mulching at least once per month.

Curbside leaf waste collection services are available in the area from private hauling companies. Waste Management is one of several hauling companies in the region that provides municipal-wide curbside leaf waste collection services to residential establishments. Leaf waste collection services are typically provided to municipalities in one of two ways: 1) municipality secures municipal-wide residential curbside leaf waste collection service as a flat fee charged to the municipality for each leaf waste collection day, or 2) curbside leaf waste collection service is incorporated into bid specifications issued by a municipality. Preferably, contracted leaf waste service is incorporated or "bundled" into a bid specification along with curbside waste and recycling services because bundling services typically lowers costs for the leaf waste component. Issuing a separate bid also adds cost and administration and may not foster competition among haulers. Still, some municipalities bid for curbside leaf waste collection service as a stand-alone service.

The cost for curbside services for leaf waste will be influenced by a number of factors, but most notable is the number of households. Cost will vary depending on how the service is secured (flat fee service or competitively bid) and the level of service requested (e.g. number of collections per year). Waste Management provided some rough estimates for flat fee rates in November of 2007. In the fall of 2007, Waste Management quoted the Town of McCandless, which has 9,300 homes, a flat rate of **\$9,500** for one municipal-wide spring leaf collection. This is just over **\$1.00 per household** for curbside leaf waste collection. Using this cost structure the Borough would pay roughly \$2,000 for each collection day. One spring and one fall curbside residential leaf waste collection would therefore be roughly estimated at **\$4,000**.

### 3.4 PADEP-approved Compost Facilities

After collection, leaf and yard waste in the region can be taken to one of several PADEP-approved compost facilities located in the Allegheny region. PADEP-approved compost facilities include:

**Permit-by-Rule Compost Facility:** A public or private compost facility that is less than 5 acres and has successfully submitted a permit-by-rule application to PADEP and follows applicable PADEP guidelines for Permit-by-Rule facilities (available at [www.depweb.pa.state.us](http://www.depweb.pa.state.us)). There is no application fee to apply for a permit-by-rule facility.

**Permit-by-Rule Farm for Land Application of Leaf Waste:** Farms can be approved to accept loads of leaf waste for land application. If a farm accepts only leaves and not other materials included in “leaf waste” (e.g. tree trimmings, shrubbery, etc.), the municipality would not fully satisfy Act 101 and PADEP leaf waste collection requirements unless acceptable provisions were made for collection of all leaf waste materials. The second half of the 1997 Permit-by-Rule Guidelines for Yard Waste Composting Facilities include the requirements for land application of leaf waste.

**Permitted Compost Facility:** A public or private compost site is over 5 acres and has an approved General Permit. A General Permit is available from PADEP for compost facilities 5 to 15 acres, and after completing a Determination of Applicability (DOA), it is not required to complete a new General Permit for most compost facilities. The application fee for a composting General Permit is \$500 if applied for under an established general permit for composting facilities.

**On-farm Compost Facility:** A permitted On-farm Composting Site operating under General Permit WMGM017, may be a compost option, particularly for leaves. Brush would require chipping/ grinding equipment, which could be brought on site on an as need basis. The on-farm compost permit allows the composting of yard waste, source separated food scraps from food markets, grocery stores, food banks, food distribution centers, school cafeterias, and institutions, source-separated newspaper, and source-separated corrugated paper (cardboard). There is only one permitted on-farm compost facility and it is located in eastern Pennsylvania.

**Non-permitted, Municipal Leaf Waste Collection Point:** Where leaf waste processing does not occur on the ground at the site, a municipality may designate an area to utilize collection equipment (e.g. roll-off container, waste packer, rolling floor trailer, dump truck, etc.) for purpose of collecting, consolidating and transport of leaf waste to a PADEP-approved facility. This method, with PADEP approval, does not require a permit-by-rule or general permit for compost facilities.

Of the various PADEP approved compost facilities, the likely options for the Borough include local Permit-by-Rule compost facilities, permitted compost facilities, or a non-permitted municipal leaf waste collection point (e.g. roll-off container staged monthly for drop-off collection of leaf waste). This non-permit collection option may be needed if a PADEP-approved compost facility is not available locally.

If the Borough secures curbside service with a hauling company by paying a flat fee for each service day, it will usually be left up to the hauling company to decide which approved compost facility to take the material. The destination is almost always an economic-based decision and will be influenced by collection routes, and in some cases, whether or not the hauling company also operates a compost facility in the region. If the Borough adds curbside leaf waste to its waste collection and recycling contract, it may elect as part of the contract terms, to direct leaf waste to one or more PADEP-approved compost facilities in the region. The Borough's decision to direct material to a specific compost facility must consider various factors. For example, it may be advantageous to identify a local compost facility that will accept truckloads of leaf waste from the Borough without charging the Borough a tipping fee. Additionally, some compost facilities need additional material such as leaves and other organics to help their composting process or to just add volume so they can produce more finished product for sale or free distribution to its customer base. Identifying leaf waste outlets will influence the final decision on contracted leaf collection services and will also impact the final cost for the services.

### **3.5 Supplementing Curbside Leaf Waste Collection with a Public Drop-off Location**

The Borough does not host and operate a leaf and/or yard waste compost facility, and therefore, there is no public leaf waste drop-off location available for Borough residents. Without identifying and educating residents about a leaf waste drop-off location, the Borough will be required by Act 101 to provide curbside collection services at least once each month throughout the year. Monthly curbside service can be cost-prohibitive, especially in an urban municipality like the Borough where leaf and yard waste generation is nominal and participation rates and recovery of material will be low, especially when averaged across 2,000 households.

For the Borough, it becomes imperative to identify a nearby municipality that has a PADEP-approved compost facility that is willing to allow McKees Rocks Borough residents to drop-off leaf waste at a minimum of once per month. Identifying a leaf waste drop-off location will place the Borough in a position where it can comply with Act 101 by providing curbside collection, at a minimum, of once in the spring and once in the fall. Fortunately for the Borough, there are a number of permitted compost facilities in the area that may supplement curbside collections.

In November 2007, GF contacted the Allegheny County Recycling Coordinator who provided a list of yard waste composting facilities in the County (**Appendix B**). Using this list, GF contacted two nearby compost facilities, each municipally operated:

- **Crafton Borough**
- **Green Tree Borough**

Crafton Borough operates a compost facility at their Public Works Facility that is open during the week from 7:00 a.m. to 3:30 p.m. With the understanding that McKees Rocks Borough residents would only need to be permitted to use the compost facility one day per month, the Borough Manager was favorable to sitting down with McKees Rocks Borough to possibly help them achieve compliance with the drop-off portion of the Act 101 leaf waste requirements.

Green Tree Borough operates a compost pick-up area at the Green Tree Borough Park and the Public Works Department operates a small-scale compost facility. The compost facility is primarily used to manage leaves. Leaves, some grass and Christmas trees (after chipping) are mixed together in windrows. The Green Tree compost facility does not permit residential drop-off, primarily because it is a small operation and the Borough does not wish to manage unwanted materials that may be dropped off at the property. Green Tree is not in a position to assist McKees Rocks Borough with a supplemental leaf waste drop-off.

It will be important that the Borough understand the accepted leaf and yard waste materials, handling procedures, hours of operation, etc. for any compost facility that may serve as an outlet for Borough-generated leaf waste. An accurate and consistent educational program should be developed and implemented in a manner that does not negatively impact the compost facility. Usually, public compost facilities already have flyers and other similar educational handouts.

If Crafton Borough cannot meet the Borough's drop-off needs, the Borough should follow up with municipalities using the list of yard waste composting facilities in **Appendix B**.

### **3.6 Recycling and Leaf Waste Education Requirements**

Regardless of how the Borough designs its leaf waste management program, the Borough will be subject to Act 101 and the Municipal Waste Regulation requirements for **Public Information and Education (§ 272.423 of Chapter 272)**:

- (a) A municipality subject to this subchapter shall establish a comprehensive and sustained public information and education program concerning recycling program features and requirements. As part of this program, a municipality shall, at least 30 days prior to the initiation of the recycling program and at least once every 6 months thereafter, notify persons occupying residential, commercial, institutional and municipal premises within its boundaries of the requirements of the ordinance. This notice shall include an explanation of how the system will operate, the dates of collection, and responsibilities of persons within the municipality and incentives and penalties.

In short, the Borough will need to let its residents, businesses and institutions know about its recycling program, including leaf waste collection and/or drop-off options at least once every six months.

### **Recycling Education Program:**

- at least 30 days prior to start of new program
- minimum of twice per year, once every six months
- how system will operate
- collection dates
- resident's responsibilities
- commercial, institutional and municipal establishment responsibilities

### **Recycling Education Methods:**

- print, radio, TV advertisements
- official notice
- newsletter
- public place notice
- bill stuffers
- calendars
- website
- other direct mail

## **4.0 RECOMMENDED LEAF WASTE MANAGEMENT STRATEGY FOR MCKEES ROCKS BOROUGH**

This section outlines a preferred strategy that has been developed by GF for the Borough to implement a cost effective leaf waste management strategy that complies with Act 101 requirements and PADEP policies. This strategy was developed with consideration of demographics, Borough goals, availability of compost facilities and the existing waste management and recycling program and Borough infrastructure.

### **4.1 Supplemental Leaf Waste Drop-off Location**

Prior to establishing the curbside leaf waste collection part of the program, the Borough should establish an arrangement with a local compost facility that is willing to accept, for public drop-off, leaf waste materials from McKees Rocks Borough residents at least once per month. Meetings with Crafton Borough and, as needed, meetings with other local municipalities that host compost facilities should be conducted immediately in order to secure drop-off arrangements.

### **4.2 Curbside Leaf Waste Collection Service**

After meeting the Act 101 requirement for a supplement drop-off location for leaf waste, the Borough need a minimum of two annual curbside leaf waste collections to meet applicable requirements. The Borough should secure municipal-wide leaf waste collection service using

Waste Management (or another waste hauling company). The service should include the collection of “leaf waste” including **leaves, garden residues, shrubbery and tree trimmings,** and **similar material,** but not including **grass clippings,** and be conducted once in the spring and once in the fall.

#### 4.2.1 Curbside Service Options and Comparing Costs

Initially, the Borough has two recommended options it can use to secure curbside leaf waste collection service:

- **Flat Fee Service with a Private Hauling Company:** Waste Management and possibly other local hauling companies can provide curbside leaf waste collection service. The fee for service can be charged to the Borough as a flat fee for municipal-wide leaf waste collection for a given collection day (in this case one fee for service in the spring and one in the fall). The Borough should contact at least three hauling companies to compare prices (and service options) prior to selecting a service provider. Waste Management indicated the cost is roughly a little over \$1.00 per household so it is expected the annual flat fee including two collections cost will be roughly **\$4,500.**
- **Addendum to existing waste and recycling contract:** The Borough can add curbside leaf waste service as an addendum to the existing waste and recycling contract with Waste Management. As indicated by Waste Management, this approach may not result in any lower cost (or higher cost) than other options (such as flat fee service). However, an addendum may offer the Borough some legal oversight/control of these services that may not be present when securing service in a flat fee arrangement.

#### 4.2.2 Schedule

- Certain details of the leaf waste program require follow-up by the Borough with local compost facilities, local haulers and with Borough Council. The Borough should confirm the leaf waste management program strategy by March, 2008 or earlier so that the public can be informed prior to the start of the curbside program.
- Bidding for leaf bags is recommended and should be done as soon as possible.
- The first residential curbside leaf waste pickup should be conducted in the spring of 2008, on a day agreed upon by Borough Council and as coordinated with a hauling company. A second collection in the fall should be provided on a day agreed upon by Borough Council. Waste Management indicated it would only offer the flat fee collection service on Saturdays. Other hauling companies may offer different schedule options.

### 4.2.3 Looking Ahead – Incorporate Curbside Leaf Waste Services into Waste Contract

When the Borough waste collection contract expires December 31, 2009, curbside leaf waste collection should be incorporated into the bid specifications and added to the Borough's subsequent municipal-wide curbside waste and recyclables service contract. Bidding this bundled waste management service package should result in a lower cost per household for leaf waste service when compared to the flat rate service or a contract addendum.

### 4.3 Leaf Collection Bags

The Borough should purchase Kraft paper bags for distribution to residents who wish to participate in the curbside leaf waste collection program. Bags should be made available to residents for pick up at the Borough Office and should be sold to help offset costs of the leaf waste collection program. The cost of bags is highly variable and not all households will participate in the program, especially in the first year.

It is recommended the Borough work with the CHAR-WEST Council of Governments and/or other municipalities to bid for biodegradable paper leaf bags so that the cost per bag can be lowered through the competitive bid process. If feasible, the Borough should attempt to recover at least \$1.00 per bag sold above the original cost in order to offset costs for the program. Setting the cost per bag too high may discourage participation. A residential requirement should be established via ordinance to use biodegradable leaf waste collection bags for segregated leaf waste materials that are placed at the curbside.

### 4.4 Recycling and Leaf Waste Education

To fully comply with Act 101, the Borough will need to educate residents once every six months about the residential recycling program as required by Act 101, Section 1501(d), including explanation of the leaf waste program.

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

McKees Rocks Borough is similar to many other Pennsylvania communities that are mandated by Act 101 to provide curbside recycling services including the recovery of leaf waste, which includes **leaves, garden residues, shrubbery and tree trimmings, and similar material**, but not including **grass clippings**. Determining how to satisfy the leaf waste requirements while keeping costs down is challenging. As noted by PADEP, the Borough is at risk of losing future recycling Performance Grant funds if it fails to comply with Act 101 and Act 140 requirements. The reported quantities of municipal waste and recyclables provided by Waste Management appear to be far lower than what is expected for a municipality with over 6,000 residents. Due to poor current recycling rates and minimal recycling reporting efforts, there is a clear opportunity to increase waste diversion and corresponding Recycling Performance Grant awards.

The existing refuse contract requires tree trimmings, branches, grass cuttings, weeds, leaves and yard materials must be placed in containers, bags and bundles and limits the length of material to 36 inches and weight of containers and bags to 35 pounds. However, the contract does not

require or clearly define separation/segregation collection of these materials for recycling. As described in this Report, there are a variety of ways that the Borough can increase the level of leaf waste management to be compliant with Act 101 and PADEP.

## 5.1 Recommendations

GF believes that the Borough can follow the technical guidance recommended in this Report and meet the Act 101 and PADEP leaf requirements. Importantly, Borough staff and Borough Council will need to make a number of decisions to confirm the details of the leaf waste management program. It is recommended Borough staff follow up with local municipal compost facilities, hauling companies, and as needed, the Borough's solicitor, to finalize the program. GF has provided a number of recommendations throughout this project report, and the following section is a summary of our recommendations. GF recommends McKees Rocks Borough:

- Implement an Act 101-compliant leaf waste collection program using the recommended strategy presented in Section 4.0 of this report as a baseline. Fundamentally, this strategy includes: an arrangement with a nearby municipality that allows McKees Rocks Borough residents to drop-off leaf waste at a compost facility; a spring and fall curbside leaf waste collection (beginning in the spring of 2008) provided by a private hauling company; and distribution of public recycling education information once every six months.
- If McKees Rocks Borough cannot meet the Borough's monthly leaf waste drop-off needs, the Borough should follow up with municipalities using the list of yard waste composting facilities in **Appendix B**.
- The Borough should contact Waste Management and a minimum of two other hauling companies to compare prices and service options and then select a company to provide residential curbside leaf waste service. The Borough should also compare the flat fee rates with the cost for the same service added to the existing Waste Management contract via a contract addendum. Consideration should be given to the legal benefits that may exist by having this service included under a binding legal contract (consult your solicitor).
- Establish a line item in the Borough budget to cover leaf waste collection services in the amount of at least **\$10,000** to cover cost for one spring and one fall curbside collection, biodegradable bag procurement, administration and related educational efforts. This amount assumes that flat rate curbside collection costs (for two annual collections) will remain about \$1.00 per household per collection and that there will be no cost paid by the Borough to participate in a cooperative arrangement with a municipal compost facility for monthly residential drop-off.
- Use biodegradable Kraft paper leaf bags for curbside leaf waste collection because most compost facilities refuse plastic bags. Work with other municipalities in the area and/or with the Char-West COG to cooperatively bid for biodegradable paper leaf waste bags in order to lower costs for bags. Consider use of reusable hard plastic containers provided by the household as a cost-effective alternative to purchasing, selling and distributing Kraft bags for leaf waste.

- If paper leaf bags are used, set up a system at the Borough office for distributing and selling leaf waste bags to Borough residents.
- Require residents via an ordinance to use biodegradable leaf waste collection bags for segregated leaf waste materials that are placed at the curbside, if bags are used.
- GF has drafted a response letter to the PADEP to be used as a template letter to clarify to PADEP the actions that have been taken by the Borough to comply with applicable recycling requirements (**Appendix C**). Upon finalizing the leaf waste program direction, the Borough should update this letter and submit it to PADEP as confirmation of its compliance.
- The Borough should improve the opportunity to increase Act 101, Section 904 Performance Grant awards by accurately documenting and validating recycling totals, which includes follow-up waste management and with larger business establishments to obtain recycling data for submittal to PADEP in addition to residential recycling totals.
- The Borough should consider bundling of curbside leaf waste collection service as part of the next refuse contract. Additionally, the specifications for segregating leaf waste for recycling should be clarified so that the contract terms do not use disposal as the default for this potentially recyclable material.

## **APPENDICES**

## **Appendix A**

### **PADEP Guidance: Pennsylvania's Act 101 Leaf Waste Collection Requirements**

## PENNSYLVANIA'S ACT 101 LEAF WASTE COLLECTION REQUIREMENTS

Act 101, Section 1501(c)(1)(ii) and (iii), requires persons in mandated municipalities to separate leaf waste from other municipal waste generated at residential, commercial, municipal and institutional establishments. "Leaf waste" is defined in the Act and its regulations as "Leaves, garden residues, shrubbery and tree trimmings, and similar material, but not including grass clippings." Source separated leaf waste, as with other recyclable material, is to be collected at least once per month as set forth in Act 101 Section 1501(c)(2) and (3) and processed at Pa. DEP-approved composting facilities.

Act 101 mandated municipalities with programs that collect leaves only in the fall are not in compliance with the Act. Mandated municipalities desiring to establish leaf waste collection programs in compliance with Act 101 must, as a minimum:

1. Require by ordinance that leaf waste consisting of leaves, garden residues, shrubbery and tree trimmings, and other similar material are targeted for collection from residences and commercial, municipal and institutional establishments; and
2. Establish a scheduled day, at least once per month, when leaf waste is collected from residences; or
3. Establish a scheduled day, not less than twice per year and preferably in the spring and fall, when leaf waste is collected from residences, and facilitate a drop-off location or other collection alternative approved by Pa. DEP that allows persons in the municipality to deposit leaf waste for the purposes of composting or mulching at least once per month. The leaf waste drop-off location may be located in a neighboring municipality or at a private sector establishment provided that an agreement is in place to utilize that location and the municipality keeps residents and commercial, municipal and institutional establishments informed of the option at least once every six months.
4. Ensure that commercial, institutional and municipal establishments generating leaf waste have collection service.
5. Municipalities are encouraged to manage source separated Christmas trees as leaf waste for processing at Pa. DEP-approved composting facilities.

## **Appendix B**

### **List of Allegheny County Compost Facilities**

**TABLE E3-4  
ALLEGHENY COUNTY YARD WASTE COMPOSTING SITES**

9/1/05

FACILITY	ADDRESS	CONTACT INFORMATION
AgRecycle (2)	335 N. Braddock Ave, Pgh, PA 15206 Saxonburg Blvd., Dorseyville, PA 15084	412-767-7645
Christoff Yard Waste Composting Facility	41 Priestly Road, Bridgeville, PA 15017	412-221-9275
Crafton Borough	Ewing Road, Crafton, PA 15205	412-921-0752
Edgewood Borough	Dixon Park Aberdeen St, Edgewood, PA 15218	412-242-4824
Forest Hills/ Churchill Borough	Business Rt. 22 and Rodi Road, Pgh, PA 15235	412-351-7330
Greentree Borough	Greentree Borough Park, Greentree, PA 15220	412-921-3221
Harrison Township	Box 376, Natrona Heights, PA 15065	724-224-5540
Jefferson Memorial Park	401 Curry Hollow Road, Pittsburgh, PA 15236	412-655-4500
Kennedy Township Building	340 Forest Grove Road, Coraopolis, PA 15108	412-331-2635
Leetsdale Borough	13 Ferry Street, Leetsdale, PA 15056	724-266-6069
Meinert Brothers Inc.	325 Dorseyville Road, Pittsburgh, PA 15215	412-781-9099
Monroeville Municipality	200 Starr Drive, Monroeville, PA 15146	412-856-3343
Mt. Lebanon Township	710 Washington Road, Pittsburgh, PA 15228	412-343-3859
North Hills Council of Governments	9800 McKnight Road, Pittsburgh, PA 15237	412-422-2900
Oakmont Borough	P O Box 206, Oakmont, PA 15139	412-828-3232
Penn Hills Municipality	12245 Frankstown Road, Pittsburgh, PA 15235	412-795-3500
Plum Borough	4575 New Texas Rd, Pittsburgh, PA 15239	412-795-6800
Reilly's Summer Seat Farm	1120 Roosevelt Road, Pittsburgh, PA 15237	412-364-8662
Robinson Township	1000 Church Hill Road, Pittsburgh, PA 15205	412-788-8120
Seppi and Sons	6200 Olivani Street, Pittsburgh, PA 15206	412-362-6447
South Park Composting Facility	Sesqui Drive, South Park, PA 15129	412-350-7121
Upper St. Clair/ Peters Township	Boyce Road, Pittsburgh, PA 15241	412-831-9000
White Oak Borough	2280 Lincoln Way, White Oak, PA 15131	412-672-9727
Wilkins Township	110 Pepper Road, Turtle Creek, PA 15145	412-824-6650
Wilkinsburg Borough	605 Ross Street, Pittsburgh, PA 15221	412-244-2900

## **Appendix C**

### **Template/Draft PADEP Act 101/140 Compliance Letter**

DRAFT

[DATE]

John G. Lundsted, Compliance Assistance Coordinator  
PA Department of Environmental Protection  
Division of Waste Minimization and Planning  
400 Market St., 14th Fl.  
Harrisburg, PA 17105-8472

RE: Act 101 Leaf Waste Compliance  
McKees Rocks Borough, Pennsylvania

Dear Mr. Lundsted:

This letter is written in response to the letter issued by the Pennsylvania Department of Environmental Protection (PADEP) issued on July 30, 2007 pertaining to McKees Rocks Borough's (Borough) non-compliance with Act 101 and Act 140 recycling requirements. Following receipt of this letter, the Borough requested and received Recycling Technical Assistance from Gannett Fleming, Inc. (GF) to identify an approach to satisfying Act 101 leaf waste collection requirements in a manner consistent with PADEP policy.

From this evaluation GF recommended that initially the Borough work with Waste Management (or another private hauler) to secure curbside collection services for "leaf waste" as defined by Act 101. At least one Saturday collection is planned to start in the spring of 2008 and additional Saturday collections will be provided in the fall. Waste Management (or another provider) will take collected leaf waste to one of several PADEP-approved compost facilities in the area. We have made arrangements with a nearby municipally operated compost facility for monthly residential leaf waste drop-off. Residents will be informed once every six months via \_\_\_\_\_ about our program and the compost facility in the area where they can drop-off leaf and yard waste materials to supplement our new curbside leaf waste collection program.

Looking ahead, it is our intent to add curbside leaf waste collection services into our next bid specification used to secure municipal-wide curbside waste and recycling services. Our current contract with Waste Management expires December 31, 2009.

We feel that McKees Rocks has taken actions that satisfy our Act 101 leaf waste recycling requirements. If you have any questions please contact me at (412) 331-2498.

Sincerely,

William C. Beck,  
Recycling Coordinator

**Appendix D**

**Estimated Act 101, Section 904 Recycling Performance Grants (2005 & 2006)**

Act 101, Section 904 Performance Grant Calculator

Municipality: McKees Rocks Borough

County: Allegheny

Year (data): 2005

<b>DATA INPUTS</b>	
<b>Population</b>	
	6,622
<b>Total Waste Generation (tons)</b>	
	5,298
<b>Residential Recycling Tons</b>	
	81.00
<b>Commercial Recycling Tons</b>	
	0.00
<b>Diversion Percentage</b>	
	2%
<b>ESTIMATED AWARD</b>	
<b>Base Award</b>	
	\$405
<b>Diversion Award</b>	
	\$124
<b>Commercial Bonus</b>	
	FALSE
<b>Total Grant Award</b>	
	\$529

Note: "FALSE" in Commercial Bonus indicates no commercial award.

Act 101, Section 904 Performance Grant Calculator

Municipality: McKees Rocks Borough

County: Allegheny

Year (data): 2006

<b>DATA INPUTS</b>	
<b>Population</b>	
	6,622
<b>Total Waste Generation (tons)</b>	
	5,298
<b>Residential Recycling Tons</b>	
	77.00
<b>Commercial Recycling Tons</b>	
	0.00
<b>Diversion Percentage</b>	
	1%
<b>ESTIMATED AWARD</b>	
<b>Base Award</b>	
	\$385
<b>Diversion Award</b>	
	\$112
<b>Commercial Bonus</b>	
	FALSE
<b>Total Grant Award</b>	
	\$497

Note: "FALSE" in Commercial Bonus indicates no commercial award.