FINAL REPORT

RECYCLING PROGRAM TRANSITION
AND
PUBLIC PARTICIPATION
FOR
EDGEWOOD BOROUGH

July, 2003

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Funded by SWANA and PADEP
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Attachment A  Draft Contract
Attachment B  Model Procurement Documents
1.0 Background

Although not a mandated community under Act 101, the Borough of Edgewood initiated a mandatory curbside collection program in 1992. The curbside collection program was continued until 1998. The curbside program was discontinued due to the rise in cost for collection services. Its contracted collector proposed a 51% increase. The Borough initiated a drop-off program maintaining the same types of commingled materials as the curbside program. Two drop-off sites were established; one at its municipal building and one at a municipal park. Dumpsters were provided for collection of recyclables and serviced by a private collector. The Borough viewed the drop-off program as an interim measure providing it time to assess potential options for recycling. To assist the Borough in identifying and evaluating options for recycling they applied for and were awarded a Pennsylvania Technical Assistance Grant.

2.0 Introduction

An evaluation of recycling options was conducted by R.W. Beck, Inc. and submitted to the Borough for consideration in June of 1999. R.W. Beck provided the following recommendations for the Borough’s consideration:

- Edgewood Borough should consider reinstituting its curbside recycling program at the earliest feasible date (assuming similar cost quotes for the service at this point), and include the cost as part of a refuse/recycling fee charged to residents.

- The Borough should investigate the possibility of a cooperative contract with neighboring municipalities for municipal/waste/recycling services as a means of reducing cost.

- The Borough should investigate adding newsprint and magazines to its program to boost its diversion rate, either at the curb or as drop-off materials supplementing the commingled materials collected at the curb.

- The Borough should review its public education efforts, establish clear goals, and design and implement an education campaign aimed at boosting diversion and reducing contamination, regardless of whether it continues to operate a drop-off program or reestablish a curbside program.

The Borough considered the recommendations presented and determined that it was in its best interest to reinstate the curbside collection program. The Borough opted for municipal curbside collection. Commingled materials collected by its DPW crew were delivered to a dumpster at its municipal building and the dumpster is serviced by a private collector. (Waste Management, Inc.) The Borough continues this curbside collection program. Commingled materials collected remain the same as past curbside and drop-off programs. (i.e. glass: clear, green and brown; tin cans, and HDPE and PET plastics)
The Borough requested additional assistance from the Pennsylvania Recycling Technical Assistance Program in 2001 and was awarded a grant in early 2002. The Borough requested technical assistance relative to upgrading its curbside program, expanding materials collected, source separating materials and increasing the efficiency of collections.

ARI was assigned to assist the Borough in February of 2002. A meeting was held with the acting Borough Manager to discuss the Borough’s needs and objectives. Subsequent to the meeting a work scope was provided to the Borough for consideration. The work scope included evaluation of: collection practices, addition of other types of materials, source separation of designated materials, and collection equipment. The work scope was reviewed with the Borough and arrangements were made for observing collections. Additional data and information was also requested by ARI. Subsequently, work efforts were initiated on the project and upon completion of preliminary determinations and observations, a meeting was requested to review same. ARI attempted, on numerous occasions, to contact the Borough Manager to share its observations and provide preliminary findings relative to collection equipment and program expansion/modification. It was not until several months later, (June of 2002), that ARI was informed that the acting Borough Manager had resigned and the Borough had not yet filled the position. A new Borough Manager was hired in October, 2002. ARI met with the new Borough Manager to discuss its observations and work efforts to date.

ARI was informed that the Borough was experiencing serious financial stress, which would prohibit any program expansion and potentially require it to discontinue the curbside collection program. The Borough’s severe budget deficit required it to lay off employees and curtail services. ARI was requested to modify its work scope and assist the Borough in the development of a drop-off program as a contingency in the event of discontinuance or modification of its curbside collection program.

Given the changes and reduction in personnel, and the financial deficit facing the Borough, assistance was requested to specifically provide guidance and recommendations for the development of a drop-off program and a transition strategy for program changeover. ARI was requested to detail the program development and implementation steps required for a drop-off site(s) to assist Borough staff that were not familiar with recycling program requirements or operations. ARI was also requested to provide recommendations regarding public participation during the discussion making process and program transition.

3.0 Establishment of a Drop-Off Recycling Site(s)

A drop-off program is relatively easy to implement and the Borough has previously operated two drop-off sites. The major cost factor for drop-off sites include(s) cost of equipment, site development and labor and transport of materials to markets. The following describes the general requirements for establishment and operation of a drop-off site(s).
Note: The compact nature of the Borough lends itself to a drop-off program that would be convenient for its residents. It is not as convenient as curbside, however, and will therefore most likely not be favored by its residents.

3.1 Location

Location, location, location; as with any business, location is one of the most important aspects of a drop-off site. The drop-off site must be conveniently located, easily accessible and readily identifiable. Drop-off sites are usually located at a shopping mall, supermarket, churches, municipal buildings or parks. Busy, high traffic areas are well suited to a drop-off site. The drop-off sites used previously by the Borough were located at its maintenance building and at Dickson Park. If the Borough wishes to use these sites for drop-offs, site improvements will be required. These improvements include upgrading of parking areas, limited grading, and paving or gravel surfaces. Considerations will also have to be given to access improvements. It is suggested that to the extent practical alternate sites be considered that might be better suited and more easily accessible.

3.2 Manned vs. Unmanned

Manned

Manned drop-off sites offer the advantage of having personnel available, on either a paid or volunteer basis. Personnel assist in unloading and handling and/or segregating materials. Attendants can help educate participants and insure necessary quality control is maintained. In addition, attendants have the opportunity to reinforce the importance of the program to participants and the need for their continued participation. This type of reinforcement will be particularly important to the Borough if it is going to make the change from curbside to drop-off. It is recommended that the Borough, at a minimum, man the sites for the first few months of operation. If manning the sites with Borough personnel is not possible the Borough should explore use of volunteers to monitor the site(s).

Unmanned

Unmanned drop-off sites offer the advantage of minimal overhead and coordination expenses. They can operate on a 7-day, 24-hour basis. The disadvantages include: little opportunity for quality assurance/control and there is neither assistance available nor reinforcement provided for residents. This situation can result in lower participation rates and higher rates of contamination and misuse.
3.3 Area Requirements

Area required for drop-off sites to service smaller populations (3,000 to 4,000 population) ranges from 4,000 to 5,000 square feet. Area requirements diminish with use of multiple sites. Space requirements differ depending on collection containers used and method of collection, pickup and delivery. The site should be large enough to accommodate future expansion, e.g. addition of other materials.

3.4 Containers

The area for materials collection containers should be large enough to accommodate the various collection storage containers required. Storage containers can range from 55 gallon drums, (not recommended) to 6 - 8 yard dumpster type containers, to 30 – 56 yard roll-off containers. Roll-off containers can be equipped with lids and compartmentalized for sorting of materials. There are also a variety of specialized containers for source-separated materials. If the Borough determines to include newspaper, mixed paper and/or corrugated cardboard, they must be protected from the wind, rain and snow. Plastic and aluminum containers must be protected from the wind. This prevents the newsprint from getting wet, diminishing its value, or blowing away, and that the plastic containers and aluminum cans don’t blow away creating a litter problem. Covered collection containers are recommended regardless of program type, commingled or source separated.

3.5 Access

Access is extremely important and should not be overlooked when siting and designing the drop-off site(s). For example, if roll-off containers are used, an ample area for truck maneuverability is required. Participant traffic flow is also important to site. Ease of access to the site is essential. Convenient parking spaces, at a minimum 6 or 8, should be available to participants. If the site is difficult to access or has insufficient parking causing time delays participation will go down. Where practical, a drive through design is suggested for ease of drop-off by residents and to reduce area requirement.

3.6 Appearance and Maintenance

Ascetics and cleanliness of the site are important for the following reasons:

- Residents will be more likely to use a site if it is attractive, clean and free of broken glass or debris. Soccer moms and moms with young children will be reluctant to use a site that is not well maintained.

- If the site appears to be a trash transfer station it will get trashed.
- Containers should be clearly marked e.g.: aluminum cans only, commingled (glass containers – all colors, aluminum cans and bimetal cans), etc. The collection containers should be easily distinguishable as recycling collection containers, well maintained and to the extent practical, pleasing to the eye. Use bright colors, recycling logos, or cartoon characters.

- The site should be paved (preferably) or graveled. Mud puddles and rutted areas will discourage use.

- Proper site maintenance is a must.

3.7 Security

Vandalism and illegal dumping occurs at manned and unmanned sites. The most frequent occurrence is at unmanned sites that are open 24 hours per day. Steps can be taken to mitigate these potential problems. For example, good lighting will discourage misuse, locked containers for aluminum cans can reduce theft, metal bins for newspaper can reduce or at least limit damage from fires, fencing of the site with a locking gate can help alleviate vandalism. Security cameras are a major deterrent to misuse of a site. Manned centers opened on a scheduled basis generally experience little if any vandalism or illegal dumping. The above noted security measures are eligible (up to 90% of cost) for 902 Grant funds.

4.0 Additional Considerations

The Borough will have to consider additional factors regarding drop-off site operations. These include:

1. Who will operate the site, the Borough and/or a private contractor and;
2. How will the materials be collected commingled or source separated/ single stream.

4.1 Operations /Implementation

Public

The Borough can have total control of the drop-off site(s). The Borough under this scenario would identify the site(s); develop the site(s), purchase collection containers and specialized trucks for delivery of materials to market. The Borough would also operate and market materials.
Private

The private sector also has the ability to identify, develop, equip, operate drop-off sites and market materials. This service would most likely be cost prohibitive and impractical considering the small population of the Borough.

Public/Private Partnership

A public/private partnership is an option preferred by many municipalities and will most likely be best suited to the Borough.

Under this scenario, the Borough would be responsible for site selection and development to the extent required (depending on program selected), purchase collection containers, develop/implement a public education/outreach program and establish a schedule for operation. Containers can be rented from the contractor, however, purchase of containers is recommended in that they are grant eligible, and project cost can be reduced.

The Borough has the choice of manning the site with its personnel or volunteers, having the contractor man the site or not have the site manned. It is recommended that the site be manned at least during the programs first several months of operation.

The contractor can be responsible for servicing the containers and marketing the materials. Cost to the Borough would be based on a per container pull and/or per mile transport to market. Market value of materials is generally credited against contractor fees if they have a positive value and added to fee if the market value is negative.

Services provided by a private contractor can be done on a contract or non-contract basis. The Borough should consider a contract if it determines to engage the services of the private sector. A contract will define the responsibilities of both parties and provide certain guarantees regarding services rendered. Often a contract can be negotiated with lower service rates than quoted and a floor price for materials recycled. A floor price is a guaranteed minimum price that the contractor will pay for materials. A ceiling price can also potentially be negotiated, i.e. a maximum charge for collection and marketing of materials. A copy of a draft contract is included in Attachment A.

The Borough will be eligible for 902 Grant funding for site development, equipment, education cost and any cost associated with procuring contractor services.
4.2 Materials Collected

Source separated/single stream or commingled collection of materials is dependent on several factors including but not limited to participation, economics and program goals.

Source Separated

From an economic perspective source separated/single stream materials generally hold a higher market value. However, with the exception of aluminum cans, historically materials have had great fluctuations in market value on a year-to-year, or even on a monthly basis. For example, newspaper has reached market highs of greater than $60.00/ton and lows in excess of ($20.00). The market is volatile and market price for materials is dependent on supply and demand. Quantity of material offered to the market (tons vs. pounds) also affects the price paid for materials. A material provided to the market in large quantities normally demands a higher price. One might say, it’s economy of scale. The more you place on the scale the better your economy.

Quality of material is also extremely important. Small amounts of contaminants can cause rejection of a load or greatly diminish value.

Source separated/single stream material can require a greater level of effort on behalf of program participants. The materials must be either stored in separate containers by the residents, requiring additional time and space, or the material can be commingled in one container and separated at the recycling site. Separating of materials at the site can be done by the resident, municipal personnel or volunteers.

Additional efforts required by residents to prepare, sort or store materials would most likely negatively affect participation resulting in less material being collected.

Commingled

Materials, which are commingled, (mixed in one (1) container,) are convenient for the participating residents and take up less storage area. Less educational efforts are required relative to material preparation. Due to the ease of preparation and delivery to the drop-off site, commingled programs enjoy higher participation rates resulting in greater diversion of recyclables from the waste stream. Due to the change in program from curbside to drop-off, the Borough should consider remaining with commingled materials for continuity and to assist in maximizing participation.

Newspaper, corrugated cardboard and other types of post consumer paper are normally segregated. Certain markets do however, accept commingled paper and corrugated. This mode of collection meets the goals of many programs seeking maximum waste reduction/diversion from drop-off programs.

Commingled material has a low or, more likely, negative market value but requires less sophisticated collection containers. Newspaper and other post consumer paper will
require one or more containers depending on market availability. This form of collection eliminates the potential need of dealing with several markets.

5.0 Estimate of Available Materials

Table 1 provides estimates of the recyclables available in the Borough’s municipal waste stream. The estimates are based on a generation rate of .8 tons per person per year.

<table>
<thead>
<tr>
<th>Material</th>
<th>Percent MSW</th>
<th>Tons in MSW</th>
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<tbody>
<tr>
<td>Newsprint</td>
<td>10.0%</td>
<td>265</td>
</tr>
<tr>
<td>Corrugated Paper</td>
<td>9.0%</td>
<td>238</td>
</tr>
<tr>
<td>Office Paper</td>
<td>5.5%</td>
<td>146</td>
</tr>
<tr>
<td>Glass (Clear, Brown, Green)</td>
<td>9.0%</td>
<td>238</td>
</tr>
<tr>
<td>Plastic (PET, HDPE only)</td>
<td>3.0%</td>
<td>79</td>
</tr>
<tr>
<td>Steel &amp; Bimetal Cans</td>
<td>2.0%</td>
<td>53</td>
</tr>
<tr>
<td>Aluminum Cans</td>
<td>1.0%</td>
<td>26</td>
</tr>
<tr>
<td><strong>TOTALS</strong></td>
<td><strong>39.5%</strong></td>
<td><strong>1045</strong></td>
</tr>
</tbody>
</table>

Note: Estimates are based on generation of 2,648 tons of municipal waste per year.

5.1 Capture Rate

The capture rate is the percentage of recyclables in the waste stream, which are collected by the program. The amount of material is also referred to as the diversion rate, i.e., the amount of material diverted from the waste stream. The capture or diversion rate is dependent on a number of factors noted above (e.g.: the site(s) location, access, convenience, etc.). However, the factor that has the greatest impact on participation that determines capture/diversion rates is education. An enthusiastic and well-informed resident will exert the extra effort to recycle. If the Borough changes to a drop-off program, an aggressive education/outreach effort will be required to maintain participation.

The Borough capture rate for 2002 was approximately 6.7% based on the 177.9 tons of recyclables reported by Waste Management. This capture rate could be duplicated with a drop-off program. Given that the program meets the above noted parameters and has an aggressive education and outreach campaign a high capture rate could be achieved.
Admittedly, this will not be easily accomplished considering that residents are used to the convenience of a curbside program.

Additional materials can be added to the program, e.g. newspaper, mixed paper, corrugated cardboard to augment/compensate for potential loss of participation. These materials comprise more than 60% of the recyclables available in the Borough waste stream. Expansion of the types of materials collected beyond those currently designated in the curbside program is recommended. It is further recommended that the Borough consider encouraging its commercial sector to use the drop-off sites. Corrugated cardboard, office paper, and other materials generated by business could substantially boost the capture rate while providing small business with disposal cost savings for diverted materials.

6.0 Grant Funding Available

There are two (2) primary grant programs under Act 101 which are available to recycling projects: these are Section 902 and Section 904 Grant programs.

6.1 Section 902 Grant (Project Funding)

Under Section 902, a municipality is eligible to receive 90% funding for its recycling efforts. The following items are grant eligible for establishment of a drop-off program:

- Cost associated with procurement of recycling services.
- Planning and implementation for the program.
- Site development, clearing, grading and surfacing (gravel or asphalt) of the site.
- Public notices and public education/information and promotion (brochures, calendars, banners, displays, etc.). Funding would include education for transition.
- Containers and equipment i.e.; containers for collection of recyclables at the site (dumpsters, roll-offs, specially designed, etc.), containers for residents to store and transport their recyclables. Equipment to process materials and to transport materials.
- Site security including fencing, lighting and security cameras.
- Site information and signage.
• Lease value of property for sites can be used as a match, as can cost for postage used to distribute educational materials and volunteer efforts.

The Borough should contact the County Recycling Coordinator. If the Borough opts to develop a recycling site, the Recycling Coordinator will provide a copy of a grant application and assist in its preparation. A meeting with PADEP Region Recycling Specialist will also be required prior to submission of the application.

6.2 Section 904 Grant (Performance Award)

As discussed with the Borough submission of section 904 Grant form is important particularly considering its financial challenges. Section 904 Grants or “Performance Grants” are based on the amount of material recycled and the percentage of materials diverted from the Borough waste stream. (the diversion rate) The Borough’s diversion rate for 2002 is estimated at 6.7%

The Borough is eligible to receive $5.00 for each ton of material recycled by its program. Also, for each percent of the waste stream, which is diverted, the Borough will receive an additional $1.00/ton. Funding provided under this Grant program is discretionary and can be used to defray recycling program cost or any other needs of the Borough. Detailed information regarding submission of a 904 Grant was provided by ARI and additional information is available from PADEP at www.dep.state.pa.us.

7.0 Program Transition/Public Participation

In the event the Borough determines that it is in its best interest to discontinue curbside collection and initiate a drop-off program the transition will undoubtedly be a challenge. Residents will not readily embrace the change in program; many residents voiced their displeasure in 1999 when the Borough discontinued curbside collection in favor of drop-off sites. In order for the Borough to successfully change or modify its existing program it will require the support of its residents. To support a program the residents must be informed and involved.

It is understandable that the Borough is considering discontinuing its curbside collection program as a cost savings measure. However, modification to the current curbside program, e.g. every other week collection or contracting for curbside services may provide an economically acceptable alternative.

Prior to making any decision on program change the Borough should be prepared to justify its actions, e.g. why the curbside program is being abandoned and the merits or necessity of the planned drop-off program if that is its determined course of action. As part of its due diligence ARI recommends that the Borough consider a competitive procurement for curbside collection services for recyclables and municipal waste. The bids received will provide the Borough with a hard cost for these services that can be
compared to its cost for providing the same services. The request for proposals/bids should contain various scenarios. The request should include a variety of bid options e.g. once per week collection of waste and recyclables; every other week collection of waste and recyclables; weekly collection of waste and every other week collection of recyclables; commingled materials only; commingled and paper, etc.

The Borough should also consider a Pay As You Throw (PAYT) collection option. This type of program requires residents to pay for waste collection services based on volume disposed of or per bag. No charge is assessed for recyclables. The PAYT program has been adopted by more than 200 Pennsylvania municipalities and is the most equitable for the resident. You only pay for what you dispose. Under this program recycling participation increases resulting in a greater diversion rate and reduced waste generated. (Additional information on PAYT is available from PADEP at www.dep.state.pa.us.

The procurement process may provide the Borough the ability to continue curbside service. It may prove to be a more cost effective option than current collection practices for MSW and recyclables. ARI suggests that the Borough consider the two model procurement documents for collection services, which are included in Attachment B for its consideration.

Cooperative bidding with an adjacent municipality or municipalities (as recommended in the R.W. Beck report) should also be explored.

It is recommended that the Borough establish a committee comprised of council members and interested citizens. The committee should explore options as noted above and other alternatives (evaluated by R.W. Beck) prior to the Borough making a decision to discontinue curbside collection services.

The committee could gather available information on current cost for collection and marketing of recyclables. The committee could also oversee the distribution and evaluation of request for proposals for collection services. Upon receipt of the responses to the requests for proposal, a comparative analysis can be conducted of the cost for services, public vs. private. It is recommended that the information gathered by the committee be summarized and presented at a well-advertised public meeting. Media coverage of the meeting should be supported in order to inform the residents. The Borough will want its residents to know that all options have been explored. Public awareness, understanding, and input will be of benefit to the Borough in determining a final course of action and gaining public support for the selected program.

Suggested Topics For a Public Meeting
• Current situation
  - review cost of program
  - manpower requirements
  - need for new equipment (eg: recycling, collection vehicle)
  - funding availability through Act 101 (as a nonmandated community with a voluntary program)
  - cost to continue current program

• Options and alternatives considered
  - cost and benefits of alternatives vs. current program

• Proposed program changes e.g.: curbside to drop-off, maintain curbside on an every other week basis, private sector to provide curbside services, etc.

• Impact of program change, i.e. how will the resident be affected and what will be required of them under the new or modified program

• Transition – what is the time table for the planned program

Media involvement is important prior to the meeting to inform residents of its purpose and encourage attendance. Coverage of the meeting by the media is also needed to provide information to the general populace.

Once a decision is made the committee should play an active role in the project development and transition (to include extensive public education efforts). Whether the change is from public curbside collection to drop-off, or public to private collection, some transition efforts will be required. Education and information efforts will be of great importance for public acceptance and participation.

8.0 Public Education/Outreach

The following are suggested components for public education and outreach. Education/outreach should be initiated as early in the decision making process as possible and continue through program implementation. The education/outreach efforts must be continually reinforced during the operation of the program to maintain interest and participation.

• Involve the media at an early stage while the Borough is considering a program change/modification. Provide information at public meeting and news releases regarding potential changes and/or modifications to the collection program.

• Hold a public meeting(s) to discuss potential/proposed changes to the recycling program. Encourage media participation both prior to the meeting to outline the purpose of the meeting(s) and encourage participation and to report the details of the meeting(s) and its outcome.
• Seek public input on any proposed program change or modification. Use a survey to gain public comment.

• Detail, in a brochure or flyer, the changes or modifications that will be forthcoming, the responsibilities of the residents and a schedule for program transition. Emphasize the importance of each resident’s participation and the goals and objectives of the program. Be positive and upbeat to maintain enthusiasm for recycling regardless of program changes.

• The instructional flier, door hanger or brochure, should be eye catching and to the point: (i.e.: who, what, where, when and why). The flier, door hanger or brochure could be distributed by volunteers or sent with newsletter, utility or tax bills to save on mailings. Additional brochures (and posters) could be placed in public buildings and local businesses.

• Distribute promotional items that encourage participation, (e.g.: a refrigerator magnet collection calendar, pencils, pens, rulers made from recycled materials). Items that are seen or used regularly and will act as a constant reminder.

• Preparation of a recycling display outlining the programs benefits, charting participation and avoided cost of disposal, etc. The display could be placed in the Municipal Building and used at various civic events.

• Development of a slogan e.g.: Send your leaves to a mulch better place; Recycle today for a better tomorrow. Slogans help with program identity and purpose.

• Develop a logo representing the program that will be readily identifiable. The logo can act as a constant reminder (particularly if its placed on a refrigerator magnet or calendar).

• Encourage and assist schools to provide for recycling/composting education programs. Youth “will” be constant reminders to adults regarding recycling and composting, often our best educators of adults.

9.0 Observations/Conclusions

• The Borough of Edgewood, although not a mandated municipality under Act 101, has continually strived to provide recycling opportunities to its residents.

• Due to financial considerations and manpower limitations, the Borough is forced to consider discontinuing its curbside collection of recyclables.
• Consideration should be given to alternatives and modifications to its existing curbside program prior to determining a course of action.

• Establishment of a drop-off program for the Borough of Edgewood can be accomplished with relative ease.

• Participation rates will undoubtedly decline with a drop-off program.

• Diversion rates can potentially be maintained through addition of newspaper/corrugated cardboard to the program.

10.0 Recommendations

It is recommended that:

A committee be established comprised of council members and concerned citizens to review recycling options available and to implement the program selected; drop-off or curbside collection.

• The Borough revisits options outlined by R.W. Beck, Inc. in its 1999 report. ARI concurs with the report’s findings and recommendations, which remain valid.

• A Request for Proposal/Bids be distributed to the private sector for curbside collection services for recyclables and municipal waste. Compare cost of (public/private) for collection services.

• The Borough share options considered and cost comparisons with residents at a public meeting. Given the historical support for the curbside collection of recyclables residents may be willing to pay the cost increase (if any) to continue collection services.

• If a drop-off program is to be established the Borough follow the parameters recommended in this report.

• If a drop-off program is to be initiated, the Borough continues curbside collection services for a sufficient period of time to conduct an aggressive education/outreach campaign. One month at a minimum prior to final transition, two months or more is recommended. An aggressive and sustained education program will be needed regardless of program selected.

• The Borough make application for 902 Grant funding to support its selected recycling program.

• The Borough consider the inclusion of newspaper, corrugated cardboard, office paper and other items in its selected program to increase its diversion rate.
• The Borough encourage the commercial sector to recycle.
ATTACHMENT A

DRAFT CONTRACT FOR MARKETING SERVICES

COPY AVAILABLE UPON REQUEST