

**SWANA RECYCLING
TECHNICAL ASSISTANCE STUDY**

FINAL REPORT

**GUIDANCE FOR FINALIZING THE
SOMERSET COUNTY
MUNICIPAL WASTE MANAGEMENT PLAN**

Prepared for:

**SOMERSET COUNTY
COMMISIONERS
SOMERSET COUNTY, PENNSYLVANIA**



Laurel Hill State park, Somerset County Pennsylvania

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HARRISBURG, PENNSYLVANIA

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SOMERSET COUNTY MUNICIPAL
WASTE MANAGEMENT PLAN

1.0 INTRODUCTION

After consultation with representatives of the Pennsylvania Department of Environmental Protection (PADEP), from the Southwest Regional Office (Pittsburgh, PA), as well as the Central Office (Harrisburg, PA), the County of Somerset applied on May 15, 2004 for a \$6,000 Solid Waste Technical Assistance project to be provided by Gannett Fleming (GF). The technical assistance program is provided through the partnership with the Solid Waste Authority of North America (SWANA), the Pennsylvania State Association of Township Supervisors, and the Pennsylvania Department of Environmental Protection (PADEP).

Somerset County is in the process of finalizing the County's Municipal Waste Management Plan Revision (Plan) dated October 2001. PADEP reviewed the Plan and provided comments on the Plan revision in November of 2002. Based on PADEP's comment/ deficiency letter, there are several portions of the recycling section of the Plan that need additional information or clarification to obtain final Plan approval from PADEP. One of the most critical recycling issues requiring clarification is the implementation of a County drop-off recycling program.

1.1 Scope of Work

The County is requesting assistance to review the recycling chapter of the existing Plan and the deficiencies identified by PADEP. GF will develop an approach and recommendations to resolve the outstanding issues and expedite the completion and approval process of the Plan.

GF worked with Somerset County (and PADEP) to develop the following tasks for this assignment.

Task #1 GF staff will work with Somerset County to obtain the Plan document, deficiency letter from PADEP, and other pertinent background information needed for the completion of this work.

Task #2 GF will review all pertinent information and identify the key outstanding issues and develop an approach to resolving these issues. The developed approach will be structured for use as a guidance tool to assist Somerset County and County Board members in expediting the completion of the Somerset County Municipal Waste Management Plan (Plan). GF will work with PADEP as needed to gather information and confirm GF's approach is in line with PADEP's Plan approval process.

Task #3 GF will prepare and provide Somerset County with a brief summary report of findings. This task includes a review of the draft 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 along with a MS Word summary (as required) of the project conclusions and findings. An electronic and hardcopy version of the report will be provided to Somerset County.

2.0 BACKGROUND

Somerset County is located in the southwestern portion of Pennsylvania, known as the Laurel Highlands. Most of Somerset County is located between the Allegheny Mountains on the east, and Laurel Hill on the west. Elevations range from 1,040 feet in Southampton Township, to 3,213 feet at Mount Davis, Pennsylvania's highest point. The County's land area is 1,085 square miles (seventh largest in the state). The County is home to 80,023 residents based on 2000 US Census data. The County is rural, with Somerset Township being the largest municipality. There are three in-county landfills available for municipal waste disposal. Recycling is provided in Somerset Township at the curbside. The remaining residents must take recyclables directly to private recyclers and/or scrap dealers and/or use one of the public/private recyclables drop-off sites.

3.0 EXISTING RECYCLING PROGRAM

The Municipal Waste Planning, Recycling and Waste Reduction Act of 1988 (Act 101) mandates curbside recycling in communities with a population over 10,000 and in communities over 5,000 with a density of 300 persons per square mile. Somerset Township is the only municipality mandated to recycle by Act 101 requirements within Somerset County. Somerset Township's 9,319 residents (based on 2000 US Census) represent a little more than 10 percent of the County's total population, which is approximately 80,000 persons.

3.1 Landfill Drop-off Sites

As required under Act 101 (recycling requirements for landfills), the three in-county landfills host voluntary recycling drop-off centers. These three landfills include:

Mostoller Landfill Facility

Accepted Recyclables:

- *Clear and colored glass*
- *Bi-metallic and aluminum cans*

Southern Alleghenies Landfill Facility

The drop-off location is located in Windber Borough (not the landfill site) for more convenient access for residents. Accepted recyclables include:

- Clear and colored glass
- Bi-metallic and aluminum cans

Shade Landfill Facility

Accepted Recyclables:

- Clear and colored glass
- Bi-metallic and aluminum cans

3.2 Municipal drop-off Sites

Somerset County’s voluntary municipal drop-off recycling program currently consists of ten sites located at municipal buildings, schools, and stores throughout the County. The County drop-off sites collect any number of the following Act 101 materials: aluminum, clear glass, colored glass, newspaper, steel/bi-metal, PET plastic, HDPE plastic, mixed plastic, corrugated cardboard, magazines, phone books, mixed paper, office paper, or yard waste. Seven of the municipal drop-off sites use compartmentalized roll-off containers for recyclables collection.

In August 2003, through a recycling service agreement with the Cambria County Solid Waste Authority (CCSWA), Somerset County and Cambria County implemented three new recycling drop-off locations in the northern region of Somerset County. These three drop-off sites use Haul-All recycling containers (i.e. “Big Blue Bins”) and are serviced by the CCSWA. Haul-All is a specialized rural recycling equipment vendor. The Haul-All recycling bins and specialized recycling trucks are used to service a large portion of the Cambria County recycling program. The three new sites in Somerset County service approximately 9,000 households and include:

- **Jenner Township** (4,054 residents based on 2000 US Census)
- **Hooversville Borough** (779 residents based on 2000 US Census)
- **Windber Recreation Park** (4,395 residents based on 2000 US Census)

The commodities currently being collected at these three Haul-all drop-off locations are **newspaper**, and **plastics #1** and **#2**.

The Somerset County Probation Department also operates a recycling center at the Somerset Wal-Mart Super Center. The commodities collected are:

- **Brown glass**
- **Clear glass**
- **Tin cans (bi-metallic)**
- **Aluminum**

Public participants place these commodities in barn type sheds. Community Service persons sort the materials and place them into roll-off boxes. The glass is taken by Dlubak Glass of Natrona Heights, PA and the metal is taken by JMS Recycling, (formerly Thompson's Scrap Yard), located in Somerset. Proceeds from this operation are used to provide "mini grants" to County municipalities for such things as playground refurbishing, etc.

The County anticipated expanding the Haul-all drop-off program throughout the entire County. However, the County was denied funding in the 04/05 Section 902 Grant round. Although the County is planning to apply again this year, it intends to reduce the request to fewer sites. Notably, the Section 902 grant program is significantly under funded and there is a chance the County's application may be rejected in a subsequent submittal. Program expansion will be likely limited to the extent funding is available. More information related to the proposed program is presented in the following section.

4.0 PROPOSED RECYCLING PROGRAM

The details of the proposed County recycling program are included in the Act 101, Section 902 recycling grant applications (2004/2005 grant round) for Somerset and Cambria County. This section only gives an overview of the proposed system.

The proposed Somerset County recycling program and joint county recycling relationship provides a unique opportunity to benefit Somerset County and Cambria County. Working together, the two counties can create a more sustainable recycling program for the region and extend recycling services to rural locations, where many residents have no convenient recycling outlets. The joint county partnership is already working. As stated previously, Somerset County expanded their existing drop-off recycling program by adding three drop-off recycling sites in August 2003. These three sites, located in the northern portion of Somerset County, are serviced by Cambria County.

As proposed, the expanded program plans to add a number of recycling sites that would also be serviced by Cambria County, and strategically located in Somerset County. The importance of this joint recycling program is magnified because Somerset County does not have the infrastructure, staff, expertise or desire to independently implement a recycling program. Conversely, Cambria County has the recycling infrastructure, expertise, market knowledge, and an effective educational outreach program that has made Cambria County's recycling program an ongoing success. Cambria County's involvement in Somerset's recycling program will make Somerset's recycling program a better, more sustainable program than if Somerset acted alone. Additionally, Cambria County and Somerset County's combined program is expected to generate shared cost savings through increased annual recyclables tonnages and revenues from sale of the material. The proposed expansion, in line with the goals of the Somerset Municipal Waste Management Plan, supports increased recycling efforts throughout the entire County. The expectation is that the expanded program will contribute toward the County achieving a 35 percent recycling rate.

When fully implemented, the recycling program may consist of approximately ten sites strategically distributed throughout the County to optimize the convenience of recycling to the large majority of Somerset citizens.

The proposed materials collected at each of the drop-off sites may include:

- Clear glass
- Tin and aluminum cans
- PET and HDPE plastic bottles and jugs
- Newspaper
- Magazines (using a mobile drop-off trailer with custom bins)

All of the targeted recyclable materials proposed for collection by the Somerset County drop-off program are accepted for processing and marketing at the Indiana County Recycling Center. Currently Cambria County delivers all recyclables except for glass to the Indiana County Recycling Center. Cambria County may pursue and utilize other recyclables markets if economically feasible.

The proposed recycling Consolidation Center in southern Cambria County is pivotal to the success of the Somerset County program and Cambria County program. Materials from Cambria and Somerset county drop-off sites will be consolidated at the center for shipping in larger, open-top walking floor trailers. Consolidation of recyclables has proven to be a critical factor in a sustainable recycling program. Consolidation creates opportunities to minimize transportation (and related O&M costs), creates opportunities for additional markets, and can increase the revenue return for recyclables. Additional details about the proposed program, as well as the economic benefits of the Consolidation Center, are included in the most recent Somerset County and Cambria County Section 902 Grant applications.

The County Administrative Fee will be used to offset the operation and maintenance costs (i.e. Cambria County recycling service agreement) associated with running the program. The Administrative Fee is \$2 per-ton (the fee is applied to each ton of Somerset County generated municipal waste, which is paid to the County by landfills accepting County generated waste for disposal). Any revenues made by the sale of the materials to processors, or the Section 904 Performance Grant, will be applied to the recycling program to offset incurred costs. A portion of the cost for the CCSWA service contract may be offset through Section 904 Recycling Performance Grant monies, which are awarded by the State to counties who successfully submit an application with eligible recyclable material quantities collected by the county during the previous year.

5.0 MUNICIPAL WASTE MANAGEMENT PLAN DOCUMENT REVIEW

GF reviewed the October, 2001 draft Somerset County Plan that was submitted to PADEP. The Plan was not approved by PADEP due to a number of deficiencies that were identified during PADEP's review.

5.1 PADEP Deficiency Letter

The following section reviews the PADEP deficiency letter dated November 20, 2003. For each deficiency (numbered), GF has indicated the current status and also provided recommended resolutions, sample text, and/or comments related to the deficiency.

Map E – Existing Recycling Programs and Drop-off Centers:

- 1) The dots which represent the recycling programs on this map look too much alike. Please make them various colors or shapes so it is easier to differentiate between them. This will make the map more useful to the reader.

Status: The recycling maps have been revised to differentiate the recycling programs.

Recommended Action: None. Already corrected by County.

- 2) Correct the spelling of the word “centers” in the title of the map.

Status: Map spelling corrected by County.

Recommended Action: None. Map spelling edit already corrected by Somerset County.

- 3) The two landfill sites listed in Table 10 as existing drop-off recycling sites are not marked on Map 3. Please include these recycling drop-off sites on Map 3. The Mostoller Landfill should also be listed in Table 10 and marked on Map 3 as an existing drop-off site.

Status: Map 3 has been updated by the County as specified and Table 3 was revised.

Recommended Action: None. Already corrected.

- 4) Please explain what will happen to the existing recycling drop-offs when the new county-wide recycling program begins. Will the existing programs continue to operate as usual or will there be changes to them when the County adds the other drop-off sites and begins a county-wide collection program?

Status: Somerset County is in the processes of drafting text to explain how the existing drop-off system will be affected by the proposed program.

Recommended Action: The draft Plan should incorporate the text (prepared by Somerset County) that explains how the existing drop-off system will be affected by the proposed program. GF suggests the Plan be flexible and allow the existing facilities to continue as currently being operated, be discontinued as needed, or be replaced at a future time with a Big Blue Bin system (or other system), if evaluated and approved as a feasible option. It is also suggested the County review the content

of this revision with PADEP prior to submitting a revised Plan to confirm the new text meets PADEP’s expectation for addressing this deficiency.

Note: Where possible, text in the Plan related to the drop-off program should remain flexible and avoid providing unnecessary details about site proposed locations, intended schedules, etc. Including such details in a Plan, especially about a drop-off recycling system that may work best with ongoing changes and flexibility, is not recommended. Why? - Plan compliance. Providing a fixed recycling strategy and schedule in the Plan may lead to time-consuming non-substantial plan-revisions if the Plan is found (by PADEP) to be out of compliance with the proposed recycling program. This may occur when the actual recycling system implemented (after the Plan is approved) varies from the proposed recycling system described in the Plan. Therefore, it is often better to be realistic, flexible and general when describing the proposed program. For example, it could be stated that the proposed system envisions a number of drop-off recycling sites strategically located throughout the County in high traffic areas in order to maximize recyclables collection.

Chapter V- Description of Existing Facilities:

- 5) The permitted maximum and average daily volume for Greenridge Reclamation Landfill is 2,500 tons per day. Please include this information on page 21. The landfill does have a recycling drop-off site. Please list this information also.

Status: Somerset County has updated the information on the Greenridge Reclamation Landfill to show the landfill has a permitted maximum and average daily volume of 2,500 per day.

Recommended Action: GF agrees with the simple revision made by Somerset County indicating the 2,500 ton per day permitted capacity for Greenridge Reclamation. It is further recommended, that the entire original disposal facility section be moved to an appendices in the Plan document. A simplified listing of the disposal facilities and addresses is more appropriate for this section of the Plan. GF has provided a simplified listing in response to deficiency #6 shown below. The simplified listing has been an approved method of listing designated disposal facilities in a number of municipal waste management plans. The detailed disposal facility information (as presented in the October 2001 Plan), can be incorporated and referenced in an Appendices.

Chapter VIII- Selection and Justification of Municipal Waste Management Program:

- 6) The format for listing the sites chosen to be designated disposal sites for Somerset County municipal waste and the evaluation of each of these sites needs to be revised. There are alternatives to landfilling that are not listed in this section.

A description of the alternatives to landfilling should be added and an explanation of how Somerset County decided these alternatives would not work in Somerset County.

Also, please add a description of the costs of transportation for waste to each selected facility as required by Section 272.227(c)(3) of the Municipal Waste Regulations.

Status: The format for designated disposal facilities and evaluation of these sites has not yet been revised. Alternatives to landfilling have not yet been added to the section. The costs of transportation of waste to each selected facility has not yet been updated.

Recommended Action: The existing disposal site listing in Section VIII of the Plan appears too detailed and contains a substantial amount of irrelevant information for meeting Act 101/ PADEP requirements for this section of the Plan. GF suggests, based on experience with completing numerous approved Municipal Waste Management Plans, that the current disposal site section of the Plan be removed and replaced with the simplified listing of designated disposal facilities provided below. The current disposal facility information that is removed contains useful information about each designated facility, and should be incorporated/ referenced as appendices in the Plan.

MUNICIPAL WASTE DESIGNATED DISPOSAL FACILITIES

- Mostoller Landfill
7095 Glades Pike
Somerset, PA 15501
(Somerset County)
- Shade Landfill, Inc.
1176 #1 Road
Cairnbrook, PA 15924
(Somerset County)
- Laurel Highlands Landfill
260 Laurel Ridge Road
Vintondale, PA 15909
(Cambria County)
- Mountain View Sanitary Landfill
13300 New Georges Creek Road
Frostburg, MD 21532
(Allegheny County, Maryland)
- CBF Landfill (a.k.a. Onyx Chestnut Valley)
Route 21
McClellandtown, Pa 15458-9739
(Fayette County)
- Southern Alleghenies Landfill, Inc.
843 Miller Picking Road
Davidsville, PA 15928
(Somerset County)
- Greenridge Reclamation Landfill
Landfill Road
Scottdale, Pa 15683-0223
(Westmoreland County)

ALTERNATIVES TO LANDFILLING:

Recommended Action: GF has provided draft general text below that describes alternatives to landfilling. This boilerplate information has been included in a number of approved municipal waste management plan documents. Somerset County should review

these alternatives and revise the text as necessary - then add the information into their Plan.

Landfill

Draft - Sanitary landfilling is an engineered method of disposing of solid waste on land. State and federal environmental regulations and advances in design technologies have combined to minimize the impact of sanitary landfills on the surrounding environment. The PADEP Municipal Waste Regulations require all new and existing (operating) landfills to be designed with a double liner system with leachate collection and detection elements. In addition, after closure of the landfill, the disposal area is required to be capped with a low-permeability liner system to restrict the downward flow of precipitation into the waste material.

A landfill can accept a broad variety of materials including sewage sludge, construction and demolition waste, and incinerator ash, as well as municipal and residual wastes. Handling of these materials as well as bulky items such as furniture, building materials, and large appliances, can be difficult. Further, special permit modifications are required for the disposal of sewage sludge and incinerator ash. For these reasons, not all landfills accept all of these materials.

The chief environmental concerns associated with landfilling waste are leachate contamination of groundwater, the danger of explosions caused by migrating methane gas, atmospheric and environmental health hazards from landfill gasses, truck traffic, odor, litter, and the "eyesore" of the landfill site in general. Applications for new landfill permits in Pennsylvania must demonstrate that the benefits of the project clearly outweigh the "harms" or negative impacts. Development of a new sanitary landfill is also capital-intensive, with high permitting, land, and site development costs.

Mass Burn Resource Recovery (Waste-to-Energy)

In a typical mass burn incineration facility, waste is unloaded into a receiving pit. An overhead crane feeds waste into the furnace hopper. The crane operator may pick out oversize items, such as large appliances, and will mix up the waste to insure a fairly homogeneous mix. Within the combustion chamber, the burning waste is transported along the moving grates of the stoker assembly or similar grate system. Heavy ash, called bottom ash, falls through the grates and is cooled with water. The hot combustion gases pass through the combustion chamber and past boiler tubes to produce steam. Also, the walls of the furnace itself are typically fitted with a network of water-filled tubes that use heat to produce steam. The steam is often passed through a turbine to produce electricity. The steam may also be distributed to nearby establishments for heating and/or for use as a process steam.

A mass burn incinerator can process approximately 98 percent, by weight, of the municipal solid waste stream. The quantity of ash residue requiring disposal will equal approximately 20-30 percent, by weight (by volume, approximately 10 percent) of the processed waste stream. The non-processibles (materials removed prior to combustion)

and the unburned ash residues are usually handled through a combination of recycling and landfilling. The non-processibles and especially the ash residue involve special disposal considerations that cause their disposal costs to exceed that of uncombusted municipal solid waste.

The chief environmental concerns of mass burn incineration are air emissions of acid gases, heavy metals (e.g., lead, mercury), certain organic compounds, and contamination of air and water through improper handling and disposal of the ash residue.

State and federal emissions control requirements, which currently mandate that new facilities install scrubbers for acid gas control and electrostatic precipitators (ESPs) or fabric filters (baghouses) for particulate removal, are aimed at minimizing the risk of harmful health effects from solid waste incineration.

In general, waste-to-energy projects are very capital-intensive due to extensive equipment and building needs. Larger mass burn facilities are generally constructed similarly to power utility plants with field-erected combustion and boiler systems. These can be economically feasible at sizes as low as 300 tons per day. Below 300 tons per day, most mass burn facilities are constructed with pre-fabricated, modular furnaces. Such modular systems have a lower capital cost and, generally, a somewhat reduced operating performance.

Refuse-Derived Fuel (RDF)

At an RDF facility, mixed waste is processed mechanically (and perhaps manually) into a form rendering it more suitable for use as a fuel. Typical processing steps involve size reduction, removal of noncombustible materials, and mixing.

The RDF product can be marketed to institutional or industrial facilities for use as a supplemental fuel in their existing boilers. Additional air pollution control measures may be required. If insufficient markets exist, the RDF can be burned at the RDF facility in a dedicated boiler. In Pennsylvania, PADEP requires a facility that burns RDF fuel obtain a waste management permit much the same way as a waste-to-energy facility does. This negatively impacts the prospects for developing an RDF project.

The fuel preparation process produces residuals requiring disposal; the quantity depends on the composition of the input waste and on the processing system. The process typically removes ferrous metal for recycling, and may separate other materials for recycling. If a dedicated boiler is used, there will also be ash requiring disposal.

The potential environmental impacts of an RDF facility are similar to those of a mass burn facility. There are additional concerns of worker health and safety due to the potential for explosions in the shredder and exposure to airborne material such as bacteria and molds. RDF projects are very equipment and capital-intensive. Finding a long-term user for the refuse-derived fuel material is critical to the financial feasibility of an RDF project.

Composting/Co-Composting

Composting is a biochemical process that breaks down the biodegradable organic material in waste into simpler, more stable compounds and carbon dioxide. The compost end-product is a humus containing nutrients and minerals that can be used as a soil supplement. Although of lesser nutrient value than fertilizer or sewage sludge, the compost improves soil structure for root development, water retention in sandy soils, drainage in clayey soils and the cation exchange capacity of soils. A quality compost product appears much like peat and has similar uses. A typical municipal refuse composting operation consists of the following four basic steps:

- Pre-processing - Preliminary processing consists of sorting, shredding, and preparation of a mixture suitable for composting. Some recyclable materials, particularly ferrous metals and glass, may be removed at this stage. The mixture of biodegradable materials is adjusted for moisture and nutrients, as well as particle size. A “dirty MRF” is often needed to properly pre-process the waste stream and prepare a compost feedstock.
- Solid waste is often composted with sludge (co-composting). This provides the nutrients and moisture necessary for composting of refuse. Water can be added if needed. The solid waste also acts as a bulking agent for the sludge.
- Biochemical decomposition - This composting stage makes use of naturally occurring bacteria and other microorganisms to break down the organic portion of the waste.
- Curing - Curing is required to assure that the process is complete. After a 1-2 month curing phase, the material is considered completely stabilized.
- Product Finishing - The product is prepared for use through screening, packaging (if needed), and marketing.

Solid waste composting affects only the organic portion of the solid waste. Material such as glass, plastic, metal, rubber, and textiles would be screened out and either be recycled or landfilled.

A composting facility can divert approximately 60-70 percent of the municipal solid waste stream from the landfill. The quality of the final product benefits from the removal of household hazardous waste, household batteries and used motor oil. The residue sent to the landfill is largely inorganic in nature and most of its soluble components have been removed.

A municipal waste composting project is moderately capital-intensive. The economic feasibility of MSW composting is highly dependent on the cost of other disposal alternatives (e.g. landfilling) and on the quality and local markets of the compost end-product produced.

Experimental and Emerging Technologies

There is developing technology for a process that converts paper and yard waste into ethyl alcohol and animal feed. This process could be useful if recovered waste paper is unmarketable. The process uses a low temperature acid hydrolysis procedure. The estimated process cost for this technology is extremely high in comparison to the more conventional solid waste processing and disposal options available to the County. A modified version of this process converts refuse to ethyl alcohol. A sterile sludge resulting from the process could be burned, releasing approximately 9000 BTU per pound.

These processes are still in the development phase.

Vermicomposting is an innovative composting technology that uses worms to compost various waste types. This composting method may potentially be used, particularly as a feasible method to process biosolids.

The reasons for selecting landfilling as the primary disposal method for the selected waste management system are as follows:

- Meets Public Goals—This recommended system was selected on its technical, economical, environmental and long-term merits. It meets the requirements to provide for 10 years of disposal capacity and to propose a system to attain an ultimate goal of 35% recycling.
- Cost-Effectiveness—Haulers can select from a list of designated disposal facilities. Haulers will have the option of selecting the designated processing/disposal facility that offers the best opportunity to meet their individual needs to deliver MSW collected from County sources.
- System Flexibility—The County has not committed specific amounts of waste to any of the disposal facilities designated in this Plan. Therefore, if a County hauler, municipality or business can secure a more competitive tipping fee at a facility other than those designated, additional facilities can be added as opportunities arise. Having a number of facilities available results in competition that may help minimize costs.
- Adequate Disposal Capacity—The system has more than adequate capacity to manage all municipal waste and recyclables generated in Somerset County. There is no need to seek additional facilities or consider other management options unless a petition to add a site is received by the County.

COSTS FOR TRANSPORTATION

The cost for transportation to disposal sites should be included in Chapter VIII- Selection and Justification of Municipal Waste Management Program, as specified by PADEP. Transportation costs may be available from the hauling companies and/or disposal facilities.

- 7) The environmental evaluation of each selected facility is fragmented. One or two aspects of the facility are noted (e.g. “it is an active landfill with a leachate treatment plant in operation”), but no comprehensive evaluation or common list of considerations is mentioned.

The plan does not discuss any consideration of the facility’s compliance history either. If the County is presuming that any landfill which the regulating body allows to remain actively operating has an acceptable environmental and compliance status, the County needs to state this somewhere in the selection and justification section of the plan so the reader knows these items were considered when the County was choosing sites.

Status: The environmental evaluation of the disposal facilities and compliance history information have not yet been revised/ added to the Plan.

Recommended Action: GF suggests that Somerset County clearly describe the disposal facility review process by which RFQ responders/ disposal facilities were evaluated to determine if each facility was a qualified facility. Additionally, it may be stated in the Selection and Justification section of the Plan that, in addition to the qualifying facilities through a disposal facility proposal review process, Somerset County has assumed that any landfill allowed to operate by the regulating body has an acceptable environmental and compliance status.

In reviewing a number of other approved municipal waste management plans, both completed by GF and by other consultants or municipalities, GF has not found any detailed environmental analysis of each disposal facility included as text in the body of a municipal waste management plan. Therefore, it appears the environmental portion of this deficiency may be resolved by listing the environmental considerations in the disposal facility review process description.

- 8) Mountain View Sanitary Landfill in Allegany County, Maryland is not permitted by the Pennsylvania Department of Environmental Protection. This sentence should be removed from the “Reason for Selecting” on page 38. The facility’s permit from the state of Maryland should be reviewed and documented.

Status: The incorrect sentence has been removed.

Recommended Action: Pertinent information related to the facility’s permit from the State of Maryland may be included/ referenced in the Plan appendices.

- 9) On page 45, the economic advantages of the county-wide recycling program is stated as “Reduces costs for County”. Please explain and justify how the county-wide recycling program will reduce costs for the County.

Status: Somerset County is in the process of developing text to address this deficiency.

Recommended Action: GF recommends the general statement “reduces cost for the County” be eliminated. The County should explain the economics of the County-wide program, but be careful not to make general statements. Economic information related to the drop-off program has been included in the most recent Section 902 Grant Applications submitted by both Somerset and Cambria County. This information should be revised and incorporated into the Plan.

Often a good rule for municipal waste plans is to allow flexibility in what is stated or proposed. This flexible approach may minimize the County Plan being called into question by PADEP or being out of compliance in the future. More specifically, GF suggests this section emphasize improved sustainability (on a regional level), rather than proclaim reduced cost. Nearly all-recycling programs will incur costs. It appears a strong economic advantage to the proposed program is that an experienced entity, Cambria County, is proposed to be under contract to implement the recycling program, while being motivated to reduce operational costs and increase recyclable material revenues.

- 10) Please expand the program economics of the county-wide drop-off recycling program. For instance, will there be collection and/or processing costs associated with this program and if so, where will the money come from to pay for these costs? What agreements will have to be in place in order to receive the money? Include a discussion of the Department grants that will be used to help implement this program and how these grants will help.

Status: Somerset County is in the process of developing text to address this deficiency.

Recommended Action: As stated above, economic information related to the proposed drop-off program has been included in the most recent Section 902 Grant Applications submitted by both Somerset and Cambria County. This information should be revised and incorporated into the Plan. It is suggested the County review the content of the revised economic section with PADEP prior to submitting a revised Plan to PADEP.

- 11) Section 272.227(c)(5) of the Municipal Waste Regulations requires the County to set forth a time schedule for each proposed program. Please add the time frame by month and year for implementing the county-wide drop-off recycling program and for implementing the Facilities Qualification Request (FQR) process for choosing designated disposal facilities. Include activities that have already occurred also, such as advertising the FQR, where it was advertised, when the sites were chosen, when the landfill agreements were sent out for execution, etc.

Status: The County is in the process of creating an implementation schedule to be added into the Plan.

Recommended Action: As requested in the deficiency letter, the County should add the time frame by month and year for implementing the county-wide drop-off recycling program and for implementing the FQR process for choosing designated

disposal facilities. It is important to stress, that proposed programs are often delayed for any number of reasons. With that understanding, the County should include qualifying text corresponding to the schedule that indicates that the initiation and/or implementation of the proposed programs may change, but that the County believes the schedule provided represents a reasonable time frame for implementation. In general, GF suggests the specified time frames err on conservative side.

It is again clarified that it is important to allow flexibility (where possible) in the proposed programs. For example, if the Plan proposes one or more programs the County does not implement, or the schedule falls significantly behind, it could be determined by PADEP that the Plan is out of compliance. If the Plan inconsistencies are not easily resolved, PADEP could require the County to go through an additional non-substantial (or substantial) plan review process – plan revisions may be time-consuming and there will be costs associated with the process.

Map 5 – Location of Landfills:

- 12) The sites on this map need to be labeled on the map so the reader knows where each landfill is located.

Status: This map has been revised by the County.

Recommended Action: None. Specified map correction was made.

Chapter X – Implementing Documents

- 13) Please add to this chapter what documents are necessary for implementing the county-wide drop-off recycling program.

Status: The County has not yet listed the implementing documents for the county-wide drop-off recycling program in Chapter X – Implementing Documents.

Recommended Action: The Implementing Documents section of the Plan currently lists and describes Municipal Waste Disposal Agreements and the Somerset County Waste Flow Control Ordinance. As specified by PADEP, the County should add the implementing documents related to the county-wide recycling drop-off program. Based on GF's understanding of the proposed recycling program, the implementing documents for the drop-off program include only the recycling service contract between Cambria County and Somerset County. It is unknown by GF if other implementing documents for the recycling program exist. If so, these implementing documents should also be listed in Chapter X of the Plan and included in the Plan appendices.

Additionally, GF suggests the County to include some general text related to the execution of any additional implementing documents (not yet identified by this Plan). Text similar to the following (and revised as needed) may be used: Should additional implementing documents become necessary for implementation of the Plan, the Somerset County Commissioners have the authority for adoption and execution of

any and all documents deemed necessary to carry forth planning obligations and to implement the Plan.

Chapter XI – Implementing Entity Identification:

- 14) Please add an implementing entity chapter to this plan revision as required by Section 272.229 of the Municipal Waste Regulations. Somerset County proposes two new programs in this plan – the FQR process and the county-wide drop-off recycling program. The County needs to explain what governmental entity will be responsible for each of these programs and also needs to explain the legal basis for the entity to have the authority over these programs. Additionally, restate what entity is responsible for the implementation of the parts of the plan that haven't changed such as the County ordinance, executing the landfill contracts, etc.

Status: A complete Implementing Entity Identification chapter has not yet been added to the Plan.

Recommended Action: Typically, the Implementing Entity chapter precedes the Implementing Documents chapter in municipal waste management plans. As requested by PADEP, and as required by the Municipal Waste Regulations, the Plan should identify the implementing entity for the Plan and the two programs in the Plan – the FQR process and the county-wide recycling program. GF has provided Somerset County with draft text (below) describing the implementing entity for the Plan. This draft text should be reviewed, further revised as needed, and incorporated into the Plan as a separate chapter:

Implementing Entity Identification:

Draft - The Somerset County Planning Commission is responsible for implementing the Plan. More specifically, the Somerset County Planning Commission oversees agreements insuring 10 years of adequate disposal capacity for Somerset County generated municipal waste. Further, the County plans to continue to operate and expand the existing drop-off recycling program. The County may investigate and implement other recycling programs as opportunities arise. The Somerset County Planning Commission, as a department of Somerset County government, has full legal authority to implement the Plan on behalf of Somerset County.

The institutional/ legal framework for implementing the County Plan is formed by the existing County Resolution, the PADEP approval of the Plan, Somerset County Waste Flow Control Ordinance, Municipal Waste Disposal Agreements, municipalities' existing Municipal Waste Management Ordinances, and the recycling agreement between Cambria County and Somerset County (any other plan implementation documents should be included in this text).

- 15) On page 2 of the FQR it is stated that the County plan will clearly define the process to petition the County for future inclusion of facilities in the plan, but there is no process identified anywhere in the plan. Please add the description of this process to Chapter VIII, Selection and Justification of Municipal Waste Management Program.

Status: The requested description for a process to add disposal facilities to the Plan has not yet been addressed or incorporated into the Plan.

Recommended Action: GF suggests that Somerset County make minor revisions the cover, introduction, and other pertinent sections of the Facility Qualification Request (FQR) document to create an “Application Package” used for adding qualified disposal facilities to the Plan in the future. GF has provided Somerset County with an example “Application Package” in **Appendix A**. The example provided is for reference only so the Planning Commission staff (revising the Plan) understands how the RFQ can be easily converted to an Application Package for adding disposal facilities. The example document should not be used as a base document because it contains specific information (for another county) that is not related to the RFQ process for Somerset County.

The process/ procedure of adding disposal facilities to the Plan should be described in the Plan and reference the Application Package. The Application Package (although only slightly revised from the FQR) should be included as a separate appendix in the Plan entitled “Application Package”. Remember, adding a new disposal facility to the Plan requires a non-substantial plan revision be submitted to and approved by PADEP.

GF has provided the following supporting text for adding disposal facilities that can be incorporated (revised as needed) into Chapter VIII, Selection and Justification of the Municipal Waste Management Program:

Procedure to Add Facilities to the Plan as Designated Facilities is a follows:

Draft - “There are other landfills permitted for municipal waste and residual waste disposal that have the potential for serving Somerset County. These facilities have the option of being designated in this Plan in the future if they meet the conditions stated in the Application Package include in Appendix). This document is provided for the specific purpose of adding additional qualified facilities to the Plan.

If a County hauler, municipality, business or a disposal facility desires to have a facility added to the Plan for processing or disposing of Somerset County municipal waste, other than those currently under Agreement with the County and designated in this Plan, the procedure described below must be followed to obtain County authorization to include another facility. The County must be certain that any facility used for the deposition of the County’s waste minimizes the County’s risks by being in full compliance with state and federal rules and regulations. The following procedure will enable the County to be reasonably assured that County generated waste is being properly managed.

The procedure is as follows:

1. First, a County hauler, municipality, business, or disposal facility must petition the County using a one page form to have a facility considered for adding to this Plan (see Petition Form To Add A Facility in **Appendix B** of this study)
2. After receiving the petition, the County will forward a copy of the Application Package to the facility being requested for inclusion in the Plan.
3. Upon receipt of the completed Application Package from the facility in question, the County will review and respond to the information in the Application Package.
4. If all information is in order and the facility’s submission is determined to meet the qualification criteria, the County will negotiate with the intent of executing a municipal waste disposal capacity agreement with the facility.
5. At a convenient and practical time thereafter, the County will then follow the non-substantial plan revision process to add the facility to the Plan (as required by PADEP). At the County’s discretion, the facility being added to the Plan may be asked to finance the cost of this non-substantial plan revision process. If the disposal facility in question refuses to finance this cost, the County may delay including this new facility in the Plan until it can combine this activity with a plan revision undertaken for other reasons.
6. Once the non-substantial plan revision is completed, adopted by Somerset County and approved by PADEP, a disposal capacity agreement will be executed.
7. Once the non-substantial plan revision has been made to include a new designated disposal site, and the corresponding disposal capacity agreement is executed for that site, thereafter any hauler, municipality or business will be at liberty to use this new facility for disposal of Somerset County generated municipal waste.

5.2 PADEP Southwest Regional Office Grant Application Denial Letter

In a letter dated November 20, 2003 the PADEP Southwest Regional Office informed the Somerset County Planning Commission that Section 902 Grant Application NO. 577603 “would not be recommended for funding at this time”. In short, the letter stated that prior to recommending funding for additional collection containers in Somerset County, and a Consolidation Center in Cambria County, PADEP required an analysis be completed that evaluated different marketing and collection scenarios to determine the most practical and economical recycling system for Somerset County. PADEP recommended the private recycling facilities, such as Total Recycling in Boswell and Goodwill recycling in Uniontown, should be considered in the evaluation.

It is not within the scope of work of this technical assistance to complete a full economic feasibility study for Somerset County’s proposed recycling program. However, based on information gathered during the course of this study, GF has outlined key points related to the

economics and practicality of the proposed Somerset County, and Cambria County recycling program.

5.3 Economics and Practicality of Somerset County’s Proposed Recycling Program

Based on 1) GF’s understanding of the Section 902 Grant program status, 2) review of the most recent Section 902 Grant applications for both Somerset and Cambria County, 3) discussions with representatives from Somerset County, Cambria County, and Haul-All, and 4) GF’s consulting experience in a large number of hauling, transportation, and recycling economic feasibility studies, GF has developed the following list of comments concerning the economic and practical justification for the proposed Somerset County drop-off recycling program. The proposed program would utilize Haul-All recycling containers (i.e. “Big Blue Bins”) strategically located in Somerset County to collect recyclables, which would be transported to a recycling Consolidation Center located in southern Cambria County.

5.3.1 Total Recycling and Goodwill Recycling

The local private recyclers, Total Recycling and Goodwill Recycling, are not feasible recycling alternatives for supporting a comprehensive public drop-off recycling program for all of Somerset County. This is more evident, when the services available from these two private recyclers are compared to the proposed joint-county recycling program with a centralized (for the two counties) Consolidation Center, located in and operated by Cambria County.

Total Recycling – Total Recycling is located approximately 1 mile west of Boswell in Somerset County (See **Figure 1** – Somerset County Recycling Program Map). This facility is approximately 12 miles from Somerset. It is approximately 13 miles from Total recycling to the site of the proposed recycling Consolidation Center in Richland, Cambria County. Total Recycling has been in business approximately 15 years. Historically, this recycling facility has struggled financially. Under financial strain, Total Recycling has often closed its doors on regularly scheduled operating days and thus repeatedly rejected incoming recyclables. Consequently, Total Recycling is not a stable recyclables market, which is a critical component of a sustainable public sector recycling program.

It is also noted that Total Recycling did not respond to Cambria County’s display ad for the Section 902 Grant (for the proposed recycling program and Consolidation Center) within the 30-day response period required by the Municipal Waste Regulations (Title 25). However, a meeting was held in late November, 2003 with Total Recycling and representatives from the Somerset County Planning Commission, V-Quip (recycling vendor), and the Cambria County Solid Waste Authority to address concerns voiced by Total Recycling regarding the proposed drop-off/ Consolidation Center and recycling program. Total Recycling did not oppose the proposed Consolidation Center during the meeting, but voiced concerns about the location of potential drop-off sites. From the meeting, it was apparent Total Recycling was not interested (or capable) in providing the drop-off recycling services proposed and that Total Recycling could not provide an economically feasible price (high material value & competitive/low transportation costs) for Cambria County and Somerset County recyclables.

Goodwill Recycling – This recycling facility is located in Uniontown, Fayette County (see **Figure 1**). Starting from a central location in Somerset County (i.e. Somerset Township),

this recycling market is approximately 60 miles (one-way) over very mountainous terrain. Non-collection deadhead hauling time, extended by very slow truck speeds, plus additional wear and tear on vehicles on long and steep grade roads is not conducive to truck transport – and makes this option clearly unfeasible to transport recyclables (especially when considering increasing gas prices and when compared to the Consolidation Center alternative).

If Somerset County wanted to operate and implement a recycling program independent from Cambria County - there may be value in investigating a recyclables market relationship with Goodwill Recycling in Fayette County. However, Somerset County has no desire to independently implement a recycling program. Somerset does not have the infrastructure, staff, or expertise and is looking to Cambria County as very qualified recycling entity to provide collection, transportation, marketing, and recycling education services.

5.3.2 Sustainability

As depicted by PADEP and as supported by the Act 101 regulations, all counties should be moving forward to increase their recycling rate to the established 35 percent recycling goal. In line with targeting the state goal, and in the face of increased competition for Section 902 recycling funding, PADEP has established criteria for prioritizing the allocation/ distribution of grant monies. PADEP has given some funding priority to counties who propose or successfully implement a program that demonstrates a notable increase in their recycling rate. Somerset County's small-scale existing program is expected to see notable increases in the recycling rate by using the proposed Haul-All system and Consolidation Center in Cambria County. The Haul-All collection system has demonstrated significant increased County recycling rates in many counties (e.g. Cambria increased its total recycling volume by 40 percent in one year). As reviewed in more detail in Section 5.3.1, it is evident the other rural recycling options and/or local private recycling facilities cannot provide a long-term solution with equivalent sustainability to the proposed joint-recycling program and Consolidation Center.

5.3.3 Consolidation Center Advantages

- Increased volume of recyclables, due to collection from Somerset and Cambria Counties, increases recyclable materials marketing options, increases recyclables revenues, and reduces operating costs.
- Processing costs currently paid to the Indiana County MRF would be eliminated. Cambria would receive 100 percent of the value for the collected material. Analysis by Cambria County estimates the Consolidation Center will increase market revenue by \$27,000 annually.
- The revenue share-back program with the Indiana County MRF would benefit Somerset County. Somerset would realize cost savings (seen as reduced operating expenditures) from additional recyclables collected by the Somerset program and then marketed and sold by Cambria County. As Somerset County recyclables quantities and revenue increased, the greater the savings for the Somerset County recycling program.

- Fiber may be directly marketed from the Consolidation Center. It is estimated (at this time) that fiber revenues would be \$30 - \$40 per ton for loose material delivered to market. As estimated by the CCSWA, direct marketing may yield operational cost savings of approximately \$15,000.00 per year. More significantly, the increased revenue realized through the sale of material direct to the end market would be approximately \$78,000.00 per year.
- Transporting Cambria County generated recyclables to the proposed Consolidation Center in Richland (Cambria County), when compared to transport to the Indiana County MRF, reduces the driver down time by as much as two to three hours per delivery. As shown in **Figure 1**, the Indiana County MRF is located approximately 28 miles (one-way) from a central location in Cambria County (i.e. Ebensburg). Hauling to the Consolidation Center, when compared to direct hauling to the Indiana County MRF with depot collection vehicles, is economically more feasible because the 28-mile trip to the Indiana County MRF is deadhead travel, with no collection sites located anywhere along the travel route. The Consolidation Center is approximately 20 miles from Central Cambria County. More importantly, the proposed collection routes would be coordinated/ scheduled so that the final drop-off site is serviced within 2-3 miles of the facility. Thus, drastically reducing unproductive and costly deadhead hauling.
- An economic analysis completed by Cambria County estimates a \$57,944 savings on trucking costs alone. The proposed walking floor trailer loads delivered to the Indiana County Recycling Facility are much more economical viable when compared to transporting directly to the MRF each day with the smaller depot collection vehicles

5.3.4 The Haul-All Recycling System

In part, the feasibility and practicality of the proposed Somerset County program is substantiated by the Haul-All collection system proposed for the program. PADEP has historically been very supportive of the Haul-All collection system. The Haul-All recycling system has been purchased using Section 902 grant funding (up to 90 percent of eligible costs) and successfully implemented in the following twelve Pennsylvania counties:

- | | |
|-------------|--------------|
| ▪ Allegheny | ▪ Fayette |
| ▪ Blair | ▪ Monroe |
| ▪ Cambria | ▪ Pike |
| ▪ Carbon | ▪ Schuylkill |
| ▪ Crawford | ▪ Somerset |
| ▪ Dauphin | ▪ Mercer |

The patented Haul-All recycling bins have even been included in the state “Piggy-back” purchasing program. Municipalities are not required to go through the bid processes to procure the equipment.

It has been demonstrated in Crawford County and Schuylkill County that the Haul-All collection system recovers approximately two thirds more volume than recyclables collection systems using typical roll-off containers. Information supports that Haul-All's collection system is able to recover more recyclables than other rural collection systems (e.g. roll-off containers) because of the following:

- Store and property owners are often willing to place the aesthetically pleasing Haul-All recycling containers on sites in the population centers (e.g. grocery stores, Wal-Mart stores, etc.) where residents frequent the locations. In many instances, store or property owners do not allow less attractive, more cumbersome roll-off containers on their property. Having a drop-off in a population center can be critical to the success of the drop-off. Further, the clean or unclean appearance of recycling drop-off sites seems to be reflected in the level of contamination that occurs in and around the recycling containers.
- The Haul-All system maximizes efficiency by using specialized collection trucks to collect one or two materials from all sites to complete a load. This method eliminates the need (in a roll-off type system) for making a trip to dump materials every time a drop-off site is serviced. The Haul-All system uses individual, single stream or split stream containers that allow the flexibility to add a bin as needed to increase collection capacity for a higher volume material.
- Haul-All bins can be serviced easily, with comparatively less site access required, and do not require pull & replacement of containers.
- The Haul-All collection system has proven to generate 80 percent less contamination than some roll-off systems.
- The operating/ collection cost on a per ton basis is lower than the cost of operating a roll-off collection system due to better efficiency, decreased contamination, and increased material recovery.

It is noted that, while the Haul-All collection system affords a number of rural drop-off collection advantages, the Haul-All collection system's very high capital costs has put this collection system out of financial reach for many counties and municipalities. It appears the recent strains on the State's Act 101 recycling grant programs have forced PADEP to minimize or eliminate funding support of the Haul-All collection system (at least for the time being).

6.0 CONCLUSIONS AND RECOMMENDATIONS

The Somerset County Planning Commission is in the process of responding to a PADEP comment letter that identifies a number of deficiencies in the Somerset County Municipal Waste Management Plan Revision (Plan) dated October, 2001. As part of this process to resolve the outstanding Plan deficiencies and to get the Plan approved by PADEP, Gannett Fleming (GF) was hired to provide technical assistance. In completing this technical assistance, GF has provided (in this report) a recommended approach for resolving each Plan deficiency. For a

number of the deficiencies, GF has provided draft text that can be edited and added directly into the Somerset County Plan. It is recommended the Somerset County Planning Commission closely review GF's recommended resolutions for each deficiency. It is further recommended that the Somerset County Planning Commission work closely with PADEP to confirm each deficiency has been completely addressed, prior to submitting a final Plan to PADEP.

PADEP also requested Somerset County to complete an evaluation of different marketing and collection scenarios to determine the most practical and economical recycling system for Somerset County. The local recycling facilities, Total Recycling and Goodwill Recycling, were to be considered during this evaluation. GF did not complete a detailed economic analysis of the proposed recycling program. However, GF did compile a considerable amount of pertinent background information related to the economics and practicality of Somerset's proposed recycling program. Using background information and drawing on GF's recycling program and recyclables collection and hauling expertise, GF has completed a preliminary evaluation of the proposed recycling system. GF's evaluation considers the two local recycling facilities.

Based on GF's understanding of the proposed system, the use of Total Recycling or Goodwill recycling does not support the feasible implementation of a "sustainable" recycling program in Somerset County. Neither of the two private recycling facilities appears to be able to maximize revenue return for the recyclables collected in Somerset County. Total Recycling and Goodwill do not appear willing or capable of fully supporting a County-wide public drop-off recycling program. Further, these recycling facilities do not appear to offer a practical County-wide recycling solution in the context of the proposed recycling program - when considering geographic barriers, recyclables market stability, good business relationships, benefits of a joint county recycling system, etc. Finally, neither facility has demonstrated they can provide a more economically competitive proposal (than Cambria County's proposed Consolidation Center) for recyclables collection and cost per ton for recyclables delivered to the door of the facility.

The proposed recycling system appears justified because it envisions: a network of drop-off sites strategically located in Somerset County, an efficient Haul-All recycling system, a shared Consolidation Center three miles from the Somerset County border, and coordinated collection routes that dramatically reduce wasteful/ costly deadhead hauling time. As importantly, Somerset County does not have the infrastructure, staff, expertise or desire to independently implement a recycling program. Conversely, Cambria County has the recycling infrastructure, expertise, market knowledge, and an effective educational outreach program. This joint county recycling relationship appears to be a win-win recycling program for the region. Without this recycling partnership, it does not appear that Somerset County could act alone, and feasibly expand its recycling program. At this time, a substantial portion of Somerset County residents do not have convenient recycling outlets.

It is noted that, while the Haul-All collection system affords a number of rural drop-off collection advantages and is already in place in Cambria County, the Haul-All collection system's very high capital costs has put this collection system out of financial reach for many counties and municipalities. It appears the recent strains on the State's Act 101 recycling grant programs have forced PADEP to minimize or eliminate funding support of the Haul-All collection system (at least for the time being).

APPENDIX A

Example Application Package(Not in electronic version of report)

APPENDIX B

Petition Form To Add A Facility

PETITION FORM TO ADD A FACILITY

SOMERSET COUNTY PROCESSING/DISPOSAL FACILITY

Purpose of Petitioning Process – Somerset County has secured, through agreements, a sufficient amount of disposal capacity for all municipal waste generated from County sources. However, business opportunities may arise for County haulers or municipalities with processing/disposal facilities other than those designated in the County’s Municipal Waste Management Plan that attract the interest of these parties to use another facility. Therefore, the County’s Plan has defined a process by which additional facilities can be added to the Plan. This form is used to notify the County of a party’s interest in using another processing or disposal facility and provides the County with the necessary information to contact a facility representative to begin the process to qualify the facility as a designated facility in the Plan. Please complete this form and forward to the:

**Somerset County Planning Commission
300 N. Center Ave., Ste. 540
Somerset, PA 15501**

Petitioning Party’s Name: _____

Address: _____

Phone Number: _____

Name of Requested Facility: _____

Facility Contact Person: _____

Facility Address: _____

Phone Number: _____

Fax Number: _____

E-Mail Address: _____

Explanation for requesting additional facility:

(Attach Additional Sheets if Necessary)

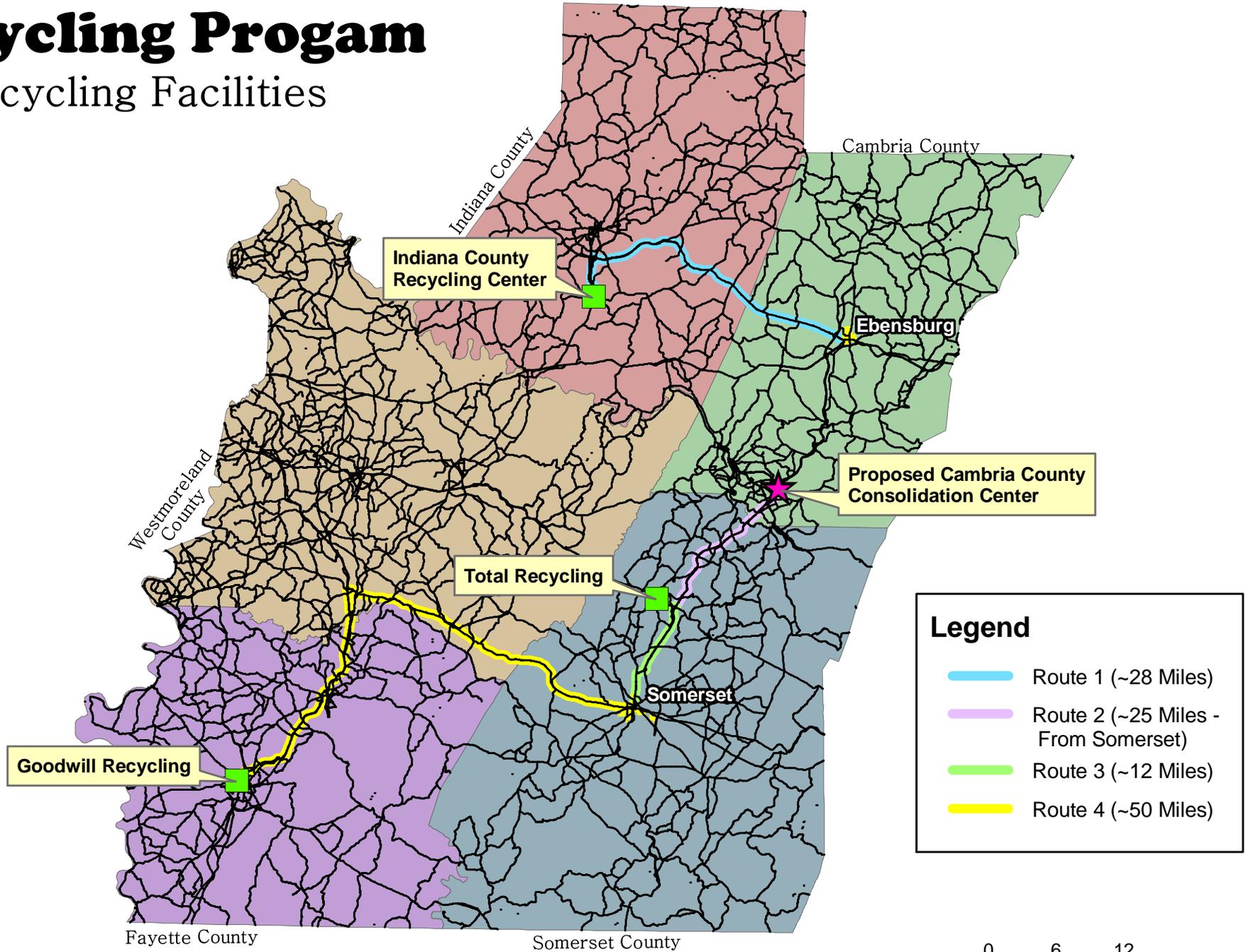


FIGURE 1

Somerset County Recycling Program Map

Somerset County Recycling Program

Recycling Facilities



Legend

- Route 1 (~28 Miles)
- Route 2 (~25 Miles - From Somerset)
- Route 3 (~12 Miles)
- Route 4 (~50 Miles)

