

**SWANA RECYCLING
TECHNICAL ASSISTANCE STUDY
FINAL REPORT
GUIDANCE FOR CONTRACTING WASTE COLLECTION AND
RECYCLING SERVICES**



Prepared for:

**HELLAM TOWNSHIP,
YORK COUNTY, PENNSYLVANIA**

Prepared by:

GANNETT FLEMING, INC.



HARRISBURG, PENNSYLVANIA

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**SWANA RECYCLING
TECHNICAL ASSISTANCE STUDY
FINAL REPORT
GUIDANCE FOR A NEWLY MANDATED RECYCLING PROGRAM**

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FIGURES

FIGURE 1: York County Township Map (Project Location)

FIGURE 2: Hellam Township Municipal Map

SWANA TECHNICAL ASSISTANCE STUDY
FINAL REPORT
FEASIBILITY STUDY FOR CONTRACTING WASTE COLLECTION AND
RECYCLING SERVICES

1.0 INTRODUCTION

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), Hellam Township was awarded \$6,000 in technical assistance to be provided by Gannett Fleming, Inc.

Gannett Fleming worked with Hellam Township to complete the three project tasks described below.

Task #1 Gannett Fleming staff worked with Hellam Township to gather pertinent background information from the Township and surrounding municipalities. Specific Township needs and/or problems associated with this project will be identified.

Task #2 GF provided preliminary guidance on contracting waste collection and recycling services in the Township. If implemented, these contracted services could potentially replace and improve the existing multi-hauler trash collection system. Contract options/scenarios will be reviewed.

Task #3 GF developed a summary report for Hellam Township including findings, technical guidance, and recommendations.

2.0 BACKGROUND

Hellam Township is a predominantly rural township that borders the eastern edge of York County (see Figure 1). Hellam Township is not currently mandated to recycle under Act 101 population/population density requirements. The Township has never contracted for waste collection and/or recycling services. A small number of Hellam Township households are provided waste collection and recycling services by Wrightsville Borough. The remaining Township residents currently use private subscription to contract trash collection and/or recycling services from one of several local private haulers.

The Township is interested in determining if lower costs and improved quality of existing residential waste collection and recycling services can be achieved through contracting a single hauler for waste collection and recycling services. Hellam Township is requesting assistance from Gannett Fleming to provide information and guidance on the feasibility of contracting for curbside recyclables and waste collection services.

3.0 EXISTING PRIVATE SUBSCRIPTION SERVICES

In a private subscription collection system residents independently subscribe for waste and/or recyclables collection services. This is common in rural municipalities like Hellam Township where there is a low population density. There are three to five private haulers that provide private subscription waste collection and recycling services for Hellam Township residents in a given year. Collection services and the cost for services for three of the haulers currently providing collection services in the Township are presented in Table 1.

As shown in **Table 1**, Hellam Township residents pay anywhere from \$50 - \$63 per quarter depending on the selected hauler and services provided (\$200 - \$250 annually). Recycling services are provided along with municipal waste collection service by two of the three haulers listed. A small number of Township residents receive municipal waste collection and recycling services from Wrightsville Borough (described in more detail in section 6.4). The only recycling services provided by the Township at this time are a yard waste drop-off location and a bi-annual bulky item pick-up program.

TABLE 1: Private Subscription Service/ Cost For Hellam Township residents (2004)

Company Name	Billing	3 Bags	6 Bags	10 bags	12 Bags	Toter	Large Items	Recycling
Penn Waste	Per Qtr.	\$54.00	\$59.00	-	-	\$18.00 + bag fee	Extra Charge	No
Waste Management	Per Qtr	-	-	-	\$57.00	\$63.00 (Toter + 8 bags)	Extra Charge	Yes
York Waste	Per Qtr	\$49.98	-	\$54.00	-	\$55.98	-	Yes

Source: Hellam Township, 2004.

GF recently completed a collection service and collection cost comparison of municipalities with different collection systems (i.e. private subscription, municipal, or contracted) during a project conducted for the Borough of Hollidaysburg, Pennsylvania. **Table 2** presents the summary of these findings along with collection cost and collection service information attained from the adjacent municipalities of Hallam Borough and Wrightsville Borough gathered during the SWANA study. As seen in **Table 2**, contracted collection systems typically have a significantly lower cost per household as compared to private subscription programs. In addition, contracted collection systems may include a variety of additional services (e.g. bulky item pick-up). In a private subscription system, additional services (e.g. bulky item pick-up, tire pick-up, appliance pick-up, etc.) are typically provided for an additional fee.

Table 2: Comparison of Residential Trash and Recyclables Collection Costs/Services

MUNICIPALITY	POPULATION (2000 Census)	DESCRIPTION OF COLLECTION SERVICE				
		Municipal/ Contracted/ Subscription	Recyclables Commingled/ Separate	Recyclables Collection Frequency	Monthly Cost/ HH	Additional Program Details
Hellam Township (York Co.)	5,930	Subscription	Varies/ none	Varies/ none	\$16.00 – \$21.00	Three haulers; \$16 includes 3 bag limit and no recycling. \$21 includes 8 bag trash max and toter for recycling.
Hallam Borough (York Co.)	1,532	Contract	Commingled	Weekly	-	Penn Waste provides waste and recyclables collection on the same day including 1 weekly bulky item. Hallam pays for collection service through General Fund (residents are not billed for service).
Wrightsville Borough (York Co.)	2,223	Municipal	Commingled	Weekly	\$14.50	Municipal waste is collected twice per week and curbside recycling is weekly. Seasonal curbside yard waste collection.
Borough Of Hollidaysburg (Blair Co.)	5,368	Subscription	Separate	Bi-weekly	\$17.25-\$25	Currently 5 licensed private haulers. Collection staff separate materials at curbside. Thursday and Friday MW collection days only.
South Heidelberg Township (Berks Co.)	5,491	Subscription	Varies	Varies/ none	\$25-\$27.25	Three haulers, one does not offer any recycling collection.
Borough Of Tyrone (Blair Co.)	5,528	Contracted	Separate	Weekly	\$11.06	A different separated recyclable material is collected each week on the same day as municipal waste. Price includes 1 spring & 1 fall clean-up
Bellefonte Borough (Centre Co.)	6,395	Municipal	Separate	Weekly	\$19.33	Unionized staff (3 staff per collection vehicle). Residential - \$52.00/quarter, plus \$6.00/quarter CCSWA for recycling. 1/yr bulk item pick-up
Ridgway Borough (Elk Co.)	4,591	Contracted	Separate	Weekly	\$11.50	Weekly collection of separated aluminum, glass, newsprint, and plastics (1998 data)
Reserve Township (Allegheny Co.)	3,856	Contracted	Commingled	Bi-weekly	\$9.97	BFI provides bi-weekly commingled collection of aluminum, glass, plastics and steel cans (2004 data)
Freedom Borough (Beaver Co.)	1,763	Contracted	Commingled	Bi-weekly	\$8.54	Bi-weekly recyclables collection of aluminum, glass, plastics, and steel cans. (2004 data)
Lewistown Borough (Mifflin Co.)	8,998	Municipal	Separate	Bi-Weekly	\$15.00	Source-separated recyclables by residents. Compartmentalized trucks. Quasi PAYT – 26 bags/qtr or 13 bags/qtr (\$5 less). 3 bulk stickers/qtr. Leaf and x-mas tree collection.

Source: Gannett Fleming, 2004.

4.0 EXISTING RECYCLING ACTIVITIES

The Township’s recycling services include a yard waste drop-off location and a bi-annual bulky item pick-up program. There is no curbside recyclables collection service offered by Hellam Township.

4.1 Yard waste Drop-off

The Township currently operates a small drop-off site for collecting and processing yard waste. The drop-off site is open 24 hours a day for residents. The Township, in conjunction with Hallam Borough, owns and operates a wood chipper that is used for processing the yard waste at the drop-off site. Ninety percent of the cost of the wood chipper was paid for through 902 recycling grant funding and the remaining cost was shared between Hellam Township and Hallam Borough. Municipal staff turns the processed material regularly with a loader. After processing, Hellam Township applies some of the yard waste as a soil amendment and soil stabilizer for erosion and sediment control. The site is also open for residential use.

The chipper alone cannot process all of the incoming yard waste and large quantities of yard waste that accumulate on-site. These piles remain there year-round. Hellam Township must rely on York County’s larger tub grinder to process the excess material. However, access to York County’s equipment has been very limited, in part due to mechanical problems. The material processed by the County’s grinder is a coarser, poorer quality material than the end product from the Township’s grinder.

The yard waste operation is one of the largest cost burdens for Hellam Township. In addition, it has not been easy to get access to yard waste processing equipment from York County. Due to cost, and without access to better yard waste processing equipment, the Township may be forced to discontinue the yard waste operation.

4.2 Bulky Item Pick-up

Twice a year, in the first week of April and the first week of October, Hellam Township municipal staff provides bulky item collection for Hellam Township residents. The Township has researched outlets for these materials and collects a variety of bulky items and some special handling materials (e.g. motor oil, antifreeze). The bulky items and other recyclable materials collected bi-annually include:

- Miscellaneous scrap items
- Construction debris
- Yard Waste
- Batteries
- Antifreeze
- Motor Oil
- Gas Grills
- Propane Cylinders
- Freon Containing Appliances
- Car Tires

Due to the cost for providing bulky item pick-ups, Hellam Township is currently considering eliminating this program.

4.3 Recyclable Container Drop-off

Hellam Township does not currently operate a drop-off site for recyclables containers within the Township. Township residents, however, do have access to the York County Solid Waste Authority's (YCSWA) public recycle drop-off center located across from the Resource Recovery Center at 2651 Blackbridge Road, Manchester Township, in York. The Recycle Drop-off Center is open seven (7) days a week during daylight hours and accepts the following materials:

- Newsprint**
(bundled or brown bagged)
- Glass (clear, brown, green)**
- Aluminum**
- Bimetallic cans**
- Plastic #1**
- Cardboard**

Modern Landfill, located in Windsor and Lower Windsor Township also accepts recyclables for drop-off by York County residents.

5.0 ESTIMATED DATE FOR BECOMING A MANDATED MUNICIPALITY

In some cases, the act of becoming “mandated” to recycle is the catalyst for a municipality to make a change from private subscription to contracted collection services. As defined by the Pennsylvania Municipal Waste Recycling, Planning and Waste Reduction Act (Act 101 of 1988), mandated municipalities are those determined by the most recent Federal decennial census to have populations of 10,000 persons or greater, or populations of 5,000 to 10,000 and population densities *greater than 300 persons per square mile*. **Table 3** shows the population, area, and population density for Hellam Township. Hallam Borough and Wrightsville Borough (located within Hellam Township) have also been included for reference and comparison.

Table 3: 2000 Population and Population Density

Township	2000 Population	Area (sq. mi)	Density
Hellam Township	5,930	27.9	213
Hallam Borough	1,532	0.6	2,553
Wrightsville Borough	2,223	0.6	3,705

As can be seen by the table, Hellam Township is not currently a “mandated” municipality based on the total population (below 10,000) or its population density (under 300 people per square mile). Under the existing Act 101 requirements, Hellam Township will not become a mandated Act 101 community any time soon (roughly 30 years based on current population growth). Consequently, the Act 101 recycling mandate should not have an impact on or be a determining factor in the timing of implementing contracted municipal waste collection and recycling services in Hellam Township in the near future.

6.0 CONTRACTED MUNICIPAL WASTE AND RECYCLING COLLECTION SYSTEMS

6.1 Private Subscription Compared to Contract Collection

In Hellam Township and in many Pennsylvania municipal governments, several to many private waste haulers compete for customers within the borders of the same municipality. In this type of collection system, often called “private subscription,” the hauler bills the individual resident directly. Local cost experience (see Table 2) from Pennsylvania municipalities has shown that multiple haulers competing in the same service area for residential customers often results in higher collection costs for the residents (as compared to the cost per household per month for contracted collection services). Collection system operated by the municipality may also offer a lower cost per household. Municipal collection systems are also shown in Table 2.

The reduced cost in a contracted collection system is largely a function of improved route efficiencies and associated lower operation and maintenance costs. The resulting price structures and services provided (e.g. frequency of collection, recycling services, bulky-item collection, etc.) result from the specifications outlined in the competitive bid. Improved costs achieved through the bid process may then be passed on to the residents, and in some cases may be used to help offset the costs of administering and operating certain municipal programs (e.g. leaf waste collection).

Contracting waste collection services may also give the municipality a higher level of control over the collection system for refuse and recyclable materials. Some municipalities manage the billing for these services and have the hauler charge the municipality directly. In this scenario, and if the resulting bid cost is favorable, the municipality may be able to attach a fee for administering the billing service. Often municipalities use the assessed fee to secure revenues to support the administration of their collection system and associated programs (e.g. yard waste collection).

There are also environmental impact benefits that may be associated with a contracted collection system. One environmental impact benefit may be reduced waste collection vehicle traffic. Reduced traffic may help minimize accidents caused by numerous haulers and can minimize the costs of street maintenance and repairs over the long term.

Although there are numerous advantages that may often be realized through contracting for municipal waste and or recycling services, not all municipalities have favorable conditions (primarily concentrated population and housing density) that will yield optimal bid responses.

6.2 Competitive Procurement

If Hellam Township elects to pursue a contracted collection system, the Township will need to enter into contracts or agreements awarded to a hauler(s) as the result of a competitive procurement. The award may be for one hauler or for more hauler(s) handling specific collection services (e.g. waste collection only, recyclables collection only, waste and recyclables collection, etc.). Typically, contracted recyclables collection services are provided on a weekly basis.

6.2.1 Public Participation

Frequently, there is some level of public opposition to the idea of any municipality contracting out the collection service(s). Residents may feel the Township is taking away their privilege to select a specific hauler and to select the level of service they desire or require. The affected private haulers and residents may also argue that the municipality is putting small businesses out-of-business because the small haulers cannot compete with the bids from larger haulers.

If the Township elects to move forward with bidding for services for a contracted hauler system, it should proceed carefully and openly. It is important to hold public meetings to introduce the intentions of the municipality. Haulers and other stakeholders should be invited to at least one meeting where comment is invited. Meetings involving the public will be helpful to better understand how receptive the residents and stakeholders will be to the proposed change and to identify any specific issues and concerns (that may be able to be addressed through the bid specifications).

Prior to bidding for services, the Township must evaluate (i.e. review with solicitor) any existing or proposed solid waste and recycling ordinance to determine if the appropriate provisions are in place to implement a successful, and legally sound contracted collection system. A solicitor should be involved throughout the process. Even when bid specifications from another municipality are used as a template, the specs should be reviewed closely to make certain the requirements meet the municipality's needs and are in compliance with the municipality's ordinances and all relevant regulations.

6.3 Hallam Borough Contracted Collection Services

Hallam Borough is located in the South Central portion of Hellam Township in York County (see Figure 2). Hallam Borough bids annually for waste collection and recycling services for Borough residents. Hallam Borough recently contracted with Penn Waste for municipal waste and recycling services. Recycling is mandated in Hallam Borough by ordinance and is provided weekly, the same day as trash pick-up, by York Waste. York Waste also provides weekly disposal of one bulky item by Borough residents.

In order to reduce the administrative challenges faced by Hallam Borough, they have elected to pay for the contracted residential municipal waste collection and recycling services through the general fund. This approach eliminates billing administration and associated issues such as follow-up with delinquent accounts, tax liens, and other related administrative duties.

6.4 Wrightsville Borough Municipal Services

Wrightsville Borough is located in Hellam Township along the eastern municipal boundary (see figure 2). Wrightsville owns and operates its own waste collection vehicles. The Borough provides curbside waste and recyclables collection to Wrightsville Borough residents and to a small number of Hellam Township residents. Curbside services include trash collection twice per week and weekly curbside recyclables collection. The Borough also provides curbside yard waste collection services on a seasonal basis. Wrightsville provides approximately 100 Hellam Township households (located within the Wrightsville Borough municipal sewer and

water service area) with curbside trash and recyclables collection services. The Borough collects the fee for municipal waste collection services directly from the residents through their sewer and water bill. The cost for curbside collection services for municipal waste and recyclables (including seasonal yard waste) is \$14.50 per month.

7.0 ALTERNATIVES FOR IMPROVING WASTE COLLECTION SERVICES

This study concludes there are three potential waste collection alternatives that may improve the Borough's existing municipal waste and collection practices:

- 1) The Township could **bid for waste collection** and/ or recycling services (i.e. selecting the lowest responsible bidder/ hauler). It is important to note that language should be included in the bid document that allows the Township to reject all and any bids at the discretion of the Township. In particular, this language will allow the municipality to decline contracted services if the bid(s) received are too high. It is recommended the Borough review Hallam Township's bid specifications for potential use as a template for Hellam Townships bid document.
- 2) The Township could approach Wrightsville Borough and consider the following: **working with Wrightsville Borough to expand Wrightsville Borough's existing service area to include additional Hellam Township residents in areas of densely populated housing where curbside collection is feasible.**
- 3) The Township could evaluate working with Wrightsville Borough and Hallam Borough (and maybe other municipalities such as Springettsbury Township entering into a **multi-municipal bid for contracted curbside collection services that may benefit each municipality (as may be seen in a lower cost per household and enhanced consistency among the waste management and recycling system).**

The conclusions and recommendations and collection system alternatives presented in this report for improving waste and recycling services in Hellam Township are based on the following considerations presented below in Sections 7.1, 7.2, and 7.3.

7.1 Hellam Township

- Route inefficiencies (several haulers operating in the Township on the same days), less than desirable quality of collection services, and relatively high private subscription costs may still provide an opportunity for the Township to improve its waste collection and recycling system through a bid for waste collection and/ or recycling collection services. Hellam Township's low population density and distance between housing units is not optimal for securing optimal pricing (cost per household) through a contracted waste collection system. Actual cost for the services desired can only be determined if the bid process is conducted and bids are received and evaluated. The extent of the services requested (e.g. recycling, leaf collection, bulky-item collection, tire collection, etc.) will impact the price per household.
- Some Hellam Township residents are concentrated in the areas surrounding Wrightsville and Hallam Boroughs.

- Hellam Township would like to improve trash collection services and extend recycling services to its residents as long as it is feasible.
- Hellam Township is not currently mandated to recycle under existing Act 101 requirements and is not expected to be mandated for another 5 to 10 years.
- Recently, Hellam Township has been working more closely with Wrightsville Borough on other joint municipal programs.

7.2 Hallam Borough

- Hallam Borough has a well-established contracted collection and recycling system and currently uses Penn Waste for these services.
- It does not appear favorable that Hallam Borough could easily incorporate some or all of Hellam Township households in a future bid scenario, in part due to Hallam Borough's billing structure (i.e. pay through the general fund, not by the residents).
- The cost of private subscription services (waste collection only) for Hellam Township residents is higher than cost of waste and recyclables collection services contracted by Hallam Borough. In addition, the contracted recycling services include curbside collection of one bulky item per week.

7.3 Wrightsville Borough

- Wrightsville Borough currently provides waste and recycling services to some Hellam Township residents who are tied into the Wrightsville Borough sewer and water system.
- Based on discussions with Hellam Township, Wrightsville Borough has expressed an interest in working with Hellam Township to provide waste collection and recycling services to at least some additional Hellam Township residents. Wrightsville Borough and Hellam Township are working together to implement an intermunicipal cooperative agreement where the staff will work together to improve services and have the shared benefit of a cooperative arrangement for certain services. As this intermunicipal relationship strengthens, there may be additionally opportunities (e.g. collection services) where the municipalities may work together.
- It is possible that the Wrightsville Borough's waste and recyclables collection operation may become more cost effective if Wrightsville Borough added some additional Hellam Township customers to its current service base (this was not evaluated or validated by this study). Improved collection efficiency may be possible if the existing Wrightsville Borough staff and equipment have the capability to service additional households. It would be important to identify a service area in Hellam Township adjacent to Wrightsville Borough where household density favors efficient collection routes. From the brief research conducted as part of this study, it does not appear that Wrightsville Borough is presently in a position to service all Hellam Township and Wrightsville Borough residents.

- The cost of private subscription services (waste collection only) for Hellam Township residents is higher than the cost of municipal waste and recyclables collection services provided by Wrightsville Borough. In addition, Wrightsville Borough offers seasonal curbside yard waste collection service.

8.0 CONCLUSIONS AND RECOMMENDATIONS

Hellam Township has observed inefficiencies resulting from multiple haulers operating in the Township on the same weekdays. More generally, the Township is not satisfied with the quality of curbside municipal waste and recycling services currently provided to residents. The Township wishes to improve the collection system to the benefit of the residents and the Township. GF's review of private subscription collection systems in Pennsylvania (comparable to Hellam Township), reveal there is often a portion of households that do not have any hauler for municipal waste collection services. Without waste and/or recycling services, residents are inclined to improperly dispose of municipal waste (e.g. burn municipal waste and/or recyclables, illegally dump waste, share collection services with other households, etc.). Residents who pay for collection services may have the perception that it is unfair for them to pay for service while others do not.

8.1 Bid for Municipal Waste Collection and Recyclables Collection Services

GF study findings conclude that Hellam Township may have an opportunity to improve the overall municipal waste and recycling collection system by transitioning into a contracted waste collection system. Successfully securing a single-hauler contract for collection service may allow the Township to:

- Reduce the numerous haulers operating inefficiently in the Township
- Ensure ALL residents have municipal waste and recycling services
- Improve the quality of collection services through a contractual agreement
- Allow an opportunity to include yard waste collection services, which is currently a cost burden and operational burden to the Township

Because of these benefits, GF's primary recommendation is that Hellam Township work with a solicitor and complete the competitive bid process for waste collection and/or recycling services. The actual pricing for contracted collection services for Hellam Township can only be determined upon receipt and review of bid responses. There is a possibility that a Township bid for collection services may not get bid responses that warrant the selection and implementation of a new contracted collection system (as decided by the Township).

Although there is an opportunity to improve the municipal waste collection and recycling system by implementing a single-hauler-contracted collection system, it must be recognized that Hellam Township does not have the housing density that favors securing optimal pricing (reduced price per household) through the competitive bid process for these services. For example, the resulting bid price for Hellam Township would be expected to be higher than Hallam Borough's cost per household in their current contract with Penn Waste.

8.1.1 Working With Hallam Borough In The Bid Process

It is recommended Hellam Township work with Hallam Borough if/when the Township develops a bid document for contracting waste collection services. In discussion between GF and Hallam Borough, it was apparent that Hallam Borough was very experienced in contracting and administering waste collection and recycling services as well as familiar with the Act 101 recycling requirements. Hallam Borough indicated they would be willing to share their bid specifications with Hellam Township upon request.

8.2 Working With Wrightsville Borough

If it is decided by Hellam Township that bidding for waste services will not be pursued, it is recommended the Township follow up with Wrightsville Borough. Wrightsville Borough has expressed an interest in working with Hellam Township to provide additional waste collection and recycling services. Currently Wrightsville Borough and Hellam Township are working together to implement an inter-municipal cooperative agreement to improve various municipal services. If it is determined that Wrightsville Borough is willing to (and has the staff and equipment available) to move forward with providing trash collection and recycling services to additional Hellam Township residents, the Township and Borough should develop the required joint contract(s) and identify efficient service areas across both municipalities.

Unless determined otherwise by Wrightsville Borough and Hellam Township, it appears that the most feasible collection system as provided by Wrightsville Borough and staff, would include servicing one or more selected service areas (where housing density was favorable) in the Township. Because Wrightsville is already familiar with conducting curbside collection, it should not be difficult to identify the most efficient service areas and routes. From the limited research conducted as part of this study, it does not appear favorable for Wrightsville to expand collection services for all Hellam Township and Wrightsville Borough residents. Determining the feasibility of this alternative was not within the scope of this study. If Wrightsville does increase the number of Hellam Township residents serviced, the Borough could bill Hellam Township customers directly. Wrightsville Borough currently bills Hellam Township customers that receive collection services from the Borough.

8.3 Multi-Municipal Bid For Contracted Collection Services

Multi-municipal bids for contracted collection services may have benefits if cooperation among municipalities is favorable. It is recommended Hellam Township evaluate entering into a multi-municipal bid for contracted curbside collection services. Hellam Township may want to discuss this concept with surrounding municipalities (e.g. Wrightsville Borough, Hallam Borough, Springettsbury Township, etc.) to determine interest and feasibility. Although evaluating the feasibility of this alternative was not within the scope of this project, a variety of benefits may result from multi-municipal bidding. Perhaps the most significant benefit (in favorable conditions) is that this type of bid may achieve a lowered cost per household. Bidding out an increased number of households (customers) typically drives down the unit price per household in a competitive bid. The downside to multi-municipal contracting may be the increased level of coordination and agreement required from participants, especially during the initial phases of development and program implementation.

FIGURES



FIGURE 1
York County Map

CUMBERLAND
COUNTY

DAUPHIN
COUNTY

LEBANON
COUNTY

LANCASTER
COUNTY

Project Area
Hellam Township

CITY OF YORK

ADAMS
COUNTY

INSERT FIGURE 2

FIGURE 2

