

August 31, 2023

Susanne Miller
Bureau of Remediation and Waste Management Director
Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333

RE: Solid Waste Management and Recycling Plan

Dear Ms. Miller:

We appreciate the opportunity to contribute our insights regarding the Maine Department of Environmental Protection's (DEP) update of the current "2019 Materials Management Plan" as required by 38 M.R.S. p. 2122 every five years. The updated five-year State Solid Waste Management and Recycling Plan (the Plan) is to go into effect January 1, 2024. The Municipal Review Committee (MRC) is deeply committed to aligning with the state's regulations concerning solid waste management and recycling goals and policies. Recently, our Waste Flow Committee convened to deliberate on this matter, and we are eager to offer the following considerations as DEP embarks on the plan's updates for the next five year Plan.

The MRC, a nonprofit organization comprising 115 members, is dedicated to the environmentally responsible, long-term disposal of municipal solid waste (MSW). Through collaboration with Innovative Resource Recovery (Innovative), we are proud partners in the Municipal Waste Solutions (MWS) facility situated in Hampden.

Within this context, we believe there are three pivotal areas that merit attention:

- Communication
- Hub and Spoke Collection and Logistics
- Technology

Communication

As you are aware, Maine encompasses 23 cities, 430 towns, 32 plantations, 41 unorganized territories, and 3 Native American reservations. This totals over 500 distinct areas generating waste and participating in recycling efforts. Presently, the **MRC represents and serves 23% of this total**. It is our projection that **our membership will expand over the next five years to encompass approximately 50%** of Maine's cities, towns, plantations, Native American reservations, and unorganized territories.

Recognizing the intricate landscape of waste generation and recycling, DEP stands to benefit from regional entities such as the MRC functioning as communication hubs to assist with the wide dissemination of information. We are eager to act as an additional conduit for your messaging, facilitating improved engagement with stakeholders. As part of our waste management strategy, we propose that the MRC and others like us serve as a liaison between the DEP and the team overseeing the Waste Plan.

In addition, the MRC recognizes we can do more to communicate with legislators, policymakers, and other stakeholders to create a more robust communication distribution channel for our email contacts.

In light of recent developments with the MWS ownership, the MRC is reemphasizing its core mission. Our renewed focus involves engaging with our members directly, through face-to-face interactions. We intend to meet with member officials and community representatives actively involved in waste management. By collaborating closely with transfer station operators and public works directors, we aim to share insights into waste-related challenges as well as successful solutions.

In the pursuit of comprehensive data collection, we have formulated plans for an extensive survey targeting our membership. We extend the offer to share the survey results with DEP, inviting your input to enhance its efficacy. By physically engaging with each member, we anticipate a high level of participation, ensuring a robust dataset for analysis.

Hub and Spoke Collection and Logistics

The concept of "hub and spoke" is one that garners our support, as we believe it holds the potential to streamline the removal of specific waste items from the waste stream. In essence, the hub and spoke approach involves centralizing collection points (hubs) and establishing efficient transport routes (spokes) to aggregate waste materials. This strategy addresses challenges faced by smaller and rural communities within the MRC and throughout the state that may struggle to accommodate certain types of waste collection or drop-off due to constraints such as funding, transportation costs, logistics, and market viability.

Given the recent Extended Producer Responsibility (EPR) legislation that seeks to reduce the production of MSW and increase municipal participation in recycling certain materials, the hub and spoke concept gains further relevance. Critical to the success of the EPR, and recycling in general is education. The MRC is committed to working to educate our members as efficiently and effectively as possible. MWS can assist the participating communities with data collection and management of the data they will need to submit to the EPR Stewardship Organization as one step towards receiving their financial reimbursement for their efforts. We also suggest exploring funding mechanisms to facilitate transportation, enabling efficient collection from smaller rural communities and subsequent transportation to larger municipalities for vendor-led collection.

Facilities with larger capacities, like MWS, enjoy advantages in terms of volume and logistical capabilities. Leveraging such facilities as hubs and spokes could yield mutually beneficial outcomes. For example, EPR participating communities that initially struggle to

meet EPR requirements once the program is in effect would be more apt to successfully comply fostering increased recycling rates toward the state's 50% waste reduction target. Furthermore, this approach safeguards against the inclusion of hazardous materials—such as lithium batteries and paints—in the waste stream, promoting environmental preservation and averting disruptions in MWS facility operations.

Anticipating the imminent concern of solar panel recycling, we recognize the potential of the hub and spoke model to play a pivotal role in resolving this issue.

Technology

Preparation of the new iteration of the Plan offers an opportunity to amplify technology-driven goals and recycling objectives through clear and attainable directives. The MRC advocates for pragmatic objectives aligned with national recycling policies. We propose that the DEP demonstrate openness to diverse recycling approaches beyond traditional curbside sorting and composting for organic waste management, acknowledging the efficacy of various waste diversion methods. While curbside sorting remains valuable, it is equally important to recognize the value of new collection methods.

We recommend that the Plan's evaluation of alternatives for waste reduction, reuse, and recycling meticulously considers cost-benefit analyses. To foster a comprehensive understanding, we encourage a discourse on the value and impact of transportation costs. Addressing the unique needs, geographic disparities, and economic constraints of diverse communities across the state is vital.

Concurrently, the Plan should prompt a review and reconsideration of the entire Waste Hierarchy, redefining the role of incineration, which has evolved beyond the confines of the National Recycling Policy, and embracing the concept of "repurposing" as a more encompassing and forward-looking term. Repurposing encapsulates the technology-driven solutions requisite for effective waste management in the present and future.

In conclusion, we extend our gratitude for the opportunity to contribute our insights during the drafting phase of the Plan. We eagerly anticipate our continued collaboration and partnership with the DEP as we collectively strive for a sustainable future. Thank you for your dedication to these shared objectives.

Sincerely,

Michael Carroll
Executive Director
Municipal Review Committee