



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

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Mr. Matt Hale

Director, Office of Solid Waste (5301P)

U.S. Environmental Protection Agency

1200 Pennsylvania Avenue, NW

Washington, DC 20460

Dear Mr. Hale:

The Local Government Advisory Committee (LGAC) applauds EPA's effort to seek advice from local government perspectives on its recycling program. The EPA recycling toolkit and calculator will be valuable tools to encourage recycling programs at the local level.

While recycling programs have made significant gains in many sectors, and many benefits for the environment have been realized, there are still many challenges and barriers to overcome in order to increase waste reduction programs, reduce the volume of landfill waste, realize the economic benefits and encourage a culture of recycling.

As you well know, two of the barriers to effective local programs are inertia and the lack of analytical tools with which to analyze local waste streams and potential markets. In that regard, the proposed tools are a valuable addition to the EPA resource base.

By encouraging the wise use of our resources through recycling tools, EPA can hopefully increase the number of households that currently recycle. In addition to the toolkit, the use of social marketing principles could greatly expedite waste reduction principles and bolster efforts at the community level.

In reviewing the toolkit and calculator, the LGAC hereby offers some general comments, as well as more detailed comments on the toolkit in Appendix 1 and the recycling calculator in Appendix 2.

Our general observations are as follows:

- Tools such as the recycling toolkit and calculator are needed and can enhance efforts at the local community level. Interested parties need data and information, examples of successful programs and helpful analytical tools when weighing recycling opportunities. The toolkit helps meet that goal.
- Large urban areas typically have recycling programs in place and enjoy strong support for recycling programs, as well as the resources to take advantage of recycling and waste reduction opportunities. The issue in these communities is usually how to expand program participation and/or the nature of the recycling program, itself. Typical examples might include expanding an existing program to include commercial businesses, large stadium events, or a construction materials component.
- However, small communities (i.e. 20,000 or smaller) have limited resources and frequently lack the expertise and/or resources to implement a recycling program even if there is public interest. They may also lack the population, the volume of material, or the market access to be successful. Therefore, the toolkit's and calculator's usefulness depends on the intended audience and their likely issues. The kit should assume that the user has a limited knowledge base and provide a road map on how to move forward and where to go for additional information. The small community example is probably one the toolkit's and calculator's biggest target audience.
- EPA should focus outreach on and target examples of small communities, especially disadvantaged communities, as well as information for Tribal governments.
- The toolkit and calculator should have an additional section that addresses the important issue of what to do when there is insufficient critical mass to support a public recycling program and what steps might be taken to develop one. In other words, how might a group or a community decipher the less obvious opportunity and/or expand their geographic or business plan to create a successful program.

- The LGAC highly recommends that EPA develop a **1-2 Fact Sheet** as a companion outreach piece to the recycling calculator.
- LGAC recommends that the toolkit include some legal “do’s” and “don’t’s” that would help to elucidate the legal framework and liability issues that should be kept in mind in drafting ordinances and participation rules.
- Economic impacts should be specifically highlighted in marketing and outreach products, such as the economic benefits of recycling.
- The toolkit and calculator should be disseminated to other national organizations such as The National League of Cities (NLC), U S Conference of Mayors (USCM), National Association of Counties (NACO), International City Managers Association (ICMA), National Association of Regional Councils (NARC), National Association of Towns and Townships (NATT), and other nonprofit organizations to gain broader support for its use and implementation. These organizations have an interest in community recycling programs and are in a unique position to help disseminate the materials. It lends added credibility to the toolkit and calculator. It would also be a useful partnership for the Agency.
- It would be very helpful if the Administrator of EPA would highlight the importance of recycling in public statements, testimony, and other venues, especially highlighting the importance economically and ecologically. Such an emphasis would bring needed public attention to recycling programs, discourage “community back peddling” and benefit the Administration as a whole.

Thank you for the opportunity to provide advice to EPA’s Office of Innovation, Partnerships, and Innovations on its recycling toolkit and calculator. These resources are a valuable addition to EPA’s community outreach programs. We look forward to working with your office on ways to reach out to all communities – large and small alike.

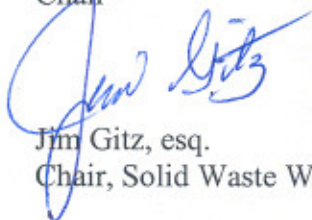
If you have any questions regarding these comments, we remain available to work with you and would be happy to assist you in whatever ways help to achieve your objectives. Our group is particularly committed to ways in which to improve the economy and quality of life of small communities.

If you have any questions, contact Mr. Jim Gitz at (815) 821-4487 or Frances Eargle, DFO for LGAC at (202)564-3115.

Sincerely,



Roy Prescott  
Chair



Jim Gitz, esq.  
Chair, Solid Waste Workgroup

cc: Maria Vickers, Deputy Director, Office of Solid Waste  
Lillian Bagus, Director, Municipal and Industrial Solid Waste  
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Thea McManus, Associate Director, Municipal and Industrial  
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John Cross, Chief, Municipal Waste Reduction Branch

Sara Hartwell, Office of Solid Waste Emergency Response

## Attachment 1

### **Local Government Advisory Committee (LGAC) Comments on the Recycling Calculator**

#### **Introduction**

- The introduction could be greatly enhanced by articulating upfront the benefits of recycling and stating the challenges and barriers for adopting recycling programs. The examples should provide supporting evidence of these challenges.

#### **Improving Recycling's Economic Profile**

- Providing strong economic gains of specific case studies would enhance this section.

#### **Assessing Recycling Program Changes**

- This section will need to be updated as calculator is available on website. The potential uses of this calculator could be helpful, as well as a summary of what it can do, and what it does not do. A disclaimer of what modeling is a predictive tool, rather than an exact one, could be useful.

#### **Community Success Stories**

- This section could be greatly enhanced by providing more information from each community, such as demographic details, and what particular problems and barriers these success stories illustrate.
- It is understood from this section that case studies would be added as they become available. Small community case studies should be targeted as case studies to seek and obtain information on for their recycling benefits and challenges.

#### **Outreach Materials**

- This section contains very valuable links and resources for communities seeking information.
- This section could be enhanced by providing a short summary or abstract of what can be found in this information.
- The link to the library of Public Service Announcements is very useful, as well as Trade Association information.

## Calculating the Environmental and Economic Benefits of Recycling

- This section is very useful providing economic metrics of recycling.
- More economic data on specific costs saved for local communities and sectors could be helpful.
- Specifically, data collected on the impact of deposit fees on bottles and containers could be helpful.

## Attachment 2

### Local Government Advisory Committee (LGAC) Comments on the Recycling Calculator

- The calculator tool is a great predictive model, and EPA is to be commended for development of such a tool.
- An introduction should be added to explain what the uses of the tool would be, with an explanation of the limitations of the model.
- Some disclaimer should be included in the above proposed introduction of the calculator.
- EPA should consider a peer-reviewed technical review of the calculator to consider data inputs.
- Data inputs may be an issue for some communities. Obtaining data on the amounts of collected recycled material is difficult since much of this is contracted work within communities, and this information may or may not be accessible because of proprietary reasons.
- EPA may wish to consider a second generation product including several piloted case studies and how these communities tested and benefited from the calculator.
- The LGAC recommends that a new section be included in the calculator that would direct a user to resources when the outcome is such that data is not available or economics precludes development of a recycling program.
- The calculator should include some metric for calculation of shared resources for recycling such as collection points, industrial recycling, etc.

#### Economic Profile

1. What about states that have deposit laws, (cans and bottles) and any data EPA has that can provide information on how this can affect recycling programs, and does this provide an impediment to recycling?
2. In today's environment where both state and local governments are faced with shrinking tax dollars, maybe more emphasis should be put on how recycling will save tax dollars

4. Finally, for what it's worth, in some communities where they contract solid waste haulers to pick up sorted recyclables in a multi-bin trailer right along with the regular trash it makes it more cost effective.