



May 28, 2024

Mr. Jon Monger
Director,
Department of Environmental Protection
2425 Reedie Drive, 4th Floor
Wheaton, MD 20902

Dear Director Monger,

We wanted to thank you, Deputy Director Jeff Seltzer and RRMD Division Director Willie Wainer for meeting with us on May 10, 2024, to discuss the County's ongoing project to redesign its waste management system. We recognize that moving away from incineration toward a more environmentally responsible materials management strategy is an extremely complex and challenging undertaking and we want to acknowledge the County's efforts to devote considerable resources to this undertaking. We also wanted to bring to your attention our outstanding concerns.

Cost-Benefit Analysis

We understand that one of the next crucial tasks for the County's contractor, Arcadis is a cost-benefit analysis of our current waste management technologies, (incineration plus landfilling the incinerator ash), compared to other potential alternatives.

We have seen cost analyses conducted by pro-incineration engineering firms in the past and want to ensure that the model that Arcadis uses takes into account the full environmental and health costs and benefits. The EPA WARM model, for example, only measures the greenhouse gases from incineration, not the toxic effects on human health of these significant pollutants: mercury, dioxin, nitrous oxides, and others. The WARM model also discounts all of the pollutants resulting from burned organic material including food scraps, paper, wood, and leather -- materials that make up nearly 50 percent of the waste stream. This means that emissions from nearly half of the waste stream are not counted when considering the dangers of incineration. Nor does the model factor in the dangers of the incinerator ash that blows into adjacent communities and waterways where it is dumped. If organic material's effects are not important, then why does the incinerator trade association's comparison of incineration to direct landfilling count all of the gases emitted from a landfill that originate from organic material? We also note that Arcadis has a history of supporting incinerator projects in other parts of the country.

We listened to the presentation and reviewed the slides that were presented by Arcadis at the May Solid Waste Advisory Committee meeting. We would appreciate seeing the methodology and factors used as well as how they will be weighted. It would be unfortunate for them to finish their analysis using biased modeling that resulted in finding incineration the safest and most

environmentally friendly technology. **Please provide the details on the evaluation criteria and model (developed as part of Arcadis Task 5) that Arcadis is using in its cost-benefit model as soon as possible before Arcadis and the County complete it.**

MRBT

We were pleased to learn from Arcadis, that Material Recovery and Biological Treatment (MRBT) is being considered among the technologies to remove additional organics and recyclable materials from the waste stream before sending “what’s left” to final disposal. A study conducted by Dr. Jeffrey Morris and colleagues found that when entering data from Seattle’s waste stream into their MEBCalc™ model, MRBT resulted in much lower monetized health and environmental costs than did either the Landfill-Gas-to-Energy or Waste-to-Energy scenarios. (See: [What is the best disposal option for the “Leftovers” on the way to Zero Waste? | Eco-Cycle](#) and our report, [Beyond Incineration](#). Chapter 4, p. 59.). This is a great ‘win-win’ technology that has virtually no proven detrimental environmental or human health effects and would significantly reduce the volume of material that has to be shipped to landfill. We applaud the County’s interest in adding this to our waste management strategy.

We do, however, have some concerns about the resulting materials from MRBT. We want to ensure that whatever MRBT technology is adopted will not include incinerating or land application of any leftover materials but will be landfilled in an appropriate facility. Nor should any resulting material be used as a soil amendment due to its potential toxicity. We’d appreciate you addressing this concern related to the plans for the county.

Potential Extension of Incinerator and Ash Contracts

As you know, our goal has been to close the incinerator by the end of the contract, in April 2026, and we are concerned that based upon what we heard during our last meeting with DEP that it is likely that an extension of the contract, as well as the ash contract, will be needed. We are concerned that this approach will delay the county’s ability to launch the food scrap composting component of the zero waste programs. Please clarify with us, how this component will be addressed in relation to the potential for delay in ending the incinerator contract.

Continuing Progress on Zero Waste

During the last several years, the County has developed a number of new zero waste programs that we fully support, including expansion of residential and commercial food scraps collection. We want to congratulate you on this great progress as well as on the inclusion of \$2 million in the FY25 budget that was unanimously approved by the County Council for planning work for an organics processing facility. This is a critical step on the road to managing our own food scraps within the County.

In addition, we applaud the County’s new mattress, textile and medical equipment recycling programs as well as expanded electronics recycling. We strongly support the adoption of these approaches. The County should also begin to adopt many others we outlined in a report prepared for the County Executive and which are also referenced in the Ten-Year Solid Waste Management Plan. These include consolidating waste collection subdistricts, implementing a Save-as-you-Throw system, developing a construction and demolition waste diversion program, and creating a Resource Recovery Park similar to Urban Ore in Berkeley, California, which the County Executive recently toured. The County should continue to make progress on these and other zero waste programs with the hiring of two new zero waste positions within RRMD that the County Executive requested and which were approved by the County Council in FY24.

Thank you again for the tremendous progress you are making to help move Montgomery County toward zero waste. Please share with us a detailed description of the models that Arcadis will be using at your earliest convenience.

We ask that you respond to our concerns, particularly those regarding the criteria used for the cost analysis, and also request a meeting with you again this summer to discuss the Arcadis recommendations for the RFP for companies to manage our waste. Please contact Susan or Amy to arrange this meeting.

Signed



Amy Maron, Chair
Zero Waste Montgomery County



Susan Eisendrath, Co-Chair
Zero Waste Montgomery County

cc: Debbie Spielberg, Special Assistant to the County Executive