

# PART TWO – Recommendations for the 2013-2023 State and Regional Solid Waste Plans

## White River Regional Solid Waste Management District Comments

### A. Needs Assessment Subcommittee Recommendations

Recommendation #1 - Change the statutes and/or regulations to reflect a change in the purpose of the Needs Assessment and Solid Waste Management Plan (from tracking waste across RSWMD jurisdictional boundaries and providing for disposal capacity) to meeting the goals of waste diversion, as established in the state and district solid waste management plans.

Statutory and regulatory changes will be required.

Implementation will not require additional funding but may require changes in how funds are distributed by ADEQ and the projects approved by regional solid waste management districts.

Funds are no longer distributed through ADEQ and projects are determined at the local level. The Regional Plans need to be locally driven and address local issues. The planning effort should evolve from the local level into statewide goals which will benefit the regions of the state.

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Recommendation #2 - Change the time frames so that each district updates its Needs Assessment and Solid Waste Management Plan every five years. For proper sequencing, the first Needs Assessment would be due in year four, and the Solid Waste Management Plan update due the next year. This would clarify the times in which certain plan elements are due, which are currently confusing and sometimes contradictory.

Statutory and regulatory changes will be required.

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Recommendation #3 - Require that each district provide only an annual report updating the district's progress toward goals in its own 10-year plan. This would be a short, simple report.

This recommendation may require changes in either the statutes or legislation, depending on which avenue will be required to effect the change.

### B. Collection Subcommittee Recommendations

Recommendation #1 - Weekly curbside/roadside collection services should be established for all household solid waste for residential dwellings within the state.

Necessary funding can be gained through user fees, taxes or other fee authority at the local level.

The “all household” requirement is not financially feasible. Sparsely populated rural areas are mainly low income areas, and the cost of bringing residential curbside to every household is cost prohibitive to both the individual and to local government. Reasonable service can be provided at drop off locations promoted by local education programs. For example, the cost of residential trash pick-up in rural Stone County would be \$40 per month or more in the extremely rural areas, but the Stone County Transfer Station will accept drop-off trash at \$1.08 per household bag. If this becomes a state mandate it will

have to be state funded. Financially strapped local governments will spend limited funds on public safety and other local services over curbside collection. Recommendation #1 is not a sustainable goal without additional state funding.

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Recommendation #2 - A minimum of semi-monthly collection services or a suitable alternative system (transfer stations) for recyclable material collection should be made available for all residential dwellings within the state. Cities should be required to implement a curbside recycling program, beginning with the most populated cities and eventually including cities of all sizes. The implementation schedule should become part of each district's plan.

Legislation may be required. Funding will be required.

Several small communities in the District have looked at curbside recycling programs but found them to be cost prohibitive and have offered drop-off programs instead. Given today's recycling center operating costs and low market returns on the sale of recyclables, the District's smaller cities have developed a regional approach to recycling with two or more communities feeding into one center. The District's ten rural counties offer recycling opportunities in twenty-five communities, nine of which are curbside programs. Drop-off recycling is available in commercial centers throughout the District, offering a suitable alternative for all households. Financially strapped local governments will spend limited funds on public safety and other local services over curbside recycling collection. If this becomes a state mandate it will have to be state funded. Recommendation #2 is not a sustainable goal without additional state funding.

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Recommendation #3 - A minimum of semi-monthly yard waste collection services or a suitable Class Y compost facility should be provided for all residential dwellings within the state. Each city within the state should be required to provide such a yard waste program. Each district should include the schedule of implementation within its solid waste plan, beginning with the larger cities. Once this program is implemented, the state should consider implementation of a statewide ban on yard waste.

Legislation will be required, and local government will need additional financial resources.

Arkansas Act 751 of 1991 already bans yard waste from active landfills. Home composting is part of the District's education program (see composting link at [www.WhiteRiverRecycles.org](http://www.WhiteRiverRecycles.org)), is taught through the UA County Extension services and Master Gardner programs. Not all of the District's residential dwellings are in need of yard waste collection services - this is low or no priority in unincorporated areas. Do residential quantities of Class Y yard waste pose an imminent health threat in rural communities? The District has only two municipalities with populations of 10,000 and above. Limited yard waste collection is offered by municipalities who can afford to offer this service, but it is cost prohibitive to most. If this becomes a state mandate it will need to be state funded. Recommendation #3 is not a sustainable goal without additional state funding.

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Recommendation #4 - Weekly curbside/roadside collection services or a suitable alternative (transfer stations or community based drop-off locations) for bulky items should be made available for all residential dwellings within the state. Implementation of the program should be included in each district's plan and be based upon population.

Legislation will not necessarily be required but would be helpful for uniform application across the state.

Additional local revenue will be required.

The District's suitable alternative is its two Class I landfills, one Class IV landfill, and seven transfer stations. A network of licensed scrap metal dealers in the area offer recycling alternatives for large metals. Additionally, many District cities and counties provide annual or semi-annual clean-up events for bulky waste. A few already provide as needed pick-up of bulky waste. To require weekly pick-up of bulky waste for all residential dwellings on an on-going basis would be very cost prohibitive in sparsely populated rural areas. Drop-off services are available within 30-40 minutes of all citizens of the District.

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**Recommendation #5** - Each district must have a waste tire program that accepts all the tires within the district. It must be adequate to handle all of the tires generated by residents and businesses within the district's area.

Districts should evaluate the current and future costs of managing waste tire programs and decide whether or not to seek adjustment to the fees currently collected by the state for this program.

ADEQ needs to undertake efforts to provide a stable and sustainable market for waste tires - including the steel making and other appropriate industries – in order to provide affordable alternatives for processing and disposal. ADEQ's tax break program for industries purchasing recycling related equipment should, where appropriate, include a commitment to use Arkansas post-consumer materials in the recycling process, especially in the use of waste tires as an energy source. Waste tire programs operate from quarterly tire fund disbursements, and the time frame for disbursements needs to be improved.

### **C. Disposal Subcommittee Recommendations**

**Recommendation #1** – Evaluate the disposal capacity of permitted landfills. Establish a 10-year minimum of disposal capacity for each district.

Legislation may be required; any type of partnership in disposal should be by written agreement, with proper legal notifications to each district and recognized by the courts.

If a district has no existing Class 1 landfill or has a facility with less than 10 years' capacity, it could partner with an adjoining district to offer low cost disposal for their residents. Funding would be necessary for new facilities or the implementation of new technologies.

Disposal capacity is evaluated annually in Annual Engineering Reports by facilities to ADEQ.

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**Recommendation #2** - Evaluate the waste stream of permitted landfills through a six-month waste audit. Develop a business plan for the diversion and recycling of waste based on the audit results.

Compliance will require legislation. Facilities may need additional funding.

Who will be responsible for the cost of a six-month audit at a public or private landfill and to develop a business plan from that information? Would they do their own audits that would result in reducing

future waste going into their facilities? With very limited financial resources available at the local level, additional regulatory requirements will ultimately result in increased costs to the local communities.

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Recommendation #3 - Expedite the permitting process through the addition of personnel and other resources at ADEQ.

Legislation may be required. Funding will be required.

With the current political climate, new fees/taxes will not be available. Higher fees and costly permits to generate revenue for ADEQ prohibit business development.

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Recommendation #4 - Allow for the establishment of “dirty” material recovery facilities (MRFs) at permitted landfills.

Legislation will be required. Facilities will need additional labor, space and markets.

What is the incentive for landfills to do this when their business plan is based on putting materials in the ground?

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Recommendation #5 - Require districts to establish Household Hazardous Waste sites within their boundaries.

Funding and additional regulations may be required.

Although this is an eligible recycling grant category, HHW collection grant assistance has not been solicited by local programs because of cash flow concerns, specifically the unknown cost of operating a program or collection event. By priority, local governments are forced to fund public health and safety, basic trash and recycling over HHW collection. One center is looking at a “bring one-take one” approach. The District addresses HHW through education and referral. The District partnered with local law enforcement in establishing a network of eleven prescription drug drop-off centers as a sustainable HHW project over the past year. If this recommendation becomes a state mandate it will need to be state funded. Recommendation #5 is not a sustainable goal without additional state funding.

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Recommendation #6 - Phase in bans of certain materials from landfills, including HHW, e-waste, clean cardboard, etc., and require manufacturer responsibility programs for recycling or reusing those materials.

Legislation will be required and funding will be required.

Unfortunately, Arkansas has not had good results with its efforts to obtain manufacturer responsibility (plastic bottles and computers). Household hazardous wastes should never be banned until there is an equally accessible, sustainable system to handle them properly, or they will go on the ground or down the drain instead of in a sanitary landfill environment. If this becomes a state mandate it will need to be state funded. Recommendation #6 is not a sustainable goal without a state funding stream.

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Recommendation #7 - Develop a media and/or education campaign that recognizes and explains the current and future costs of (1) transporting, diverting, disposing and recycling solid waste, (2) operating a properly run disposal facility, (3) maintaining closed landfills, and (4) developing emerging technologies. The campaign should also emphasize the economic impact a properly operated disposal program will have on local and state economic development.

Legislation and funding will be required.

While all the above points are valid, this is almost certainly too much detail for a media campaign. District experience in media campaigns is that the public wants convenience, cost savings and to be made to feel good about something – little else.

#### **D. Recycling Subcommittee Recommendations**

Recommendation #1 - To be complete, all recycling efforts will need to accept the following items: paper products, including news print, cardboard, white office paper, mixed paper, magazines, junk mail catalogs, phone books, boxboard and chipboard; metals, both steel and aluminum cans; plastic - #1PET, #2 HDPE and others where possible; clear and colored glass (no window glass, glass ceramics, light bulbs or ovenware); electronics, including personal electronic devices, televisions, stereos and computers; white goods (large residential appliances); tires and car batteries. All cities should have recycling in some form to include these items.

Legislation will be required. Financial needs will have to be determined as the project moves forward and a trend is established in the amount of money recaptured from selling recycled items.

Historically, Arkansas government has been very careful not to hinder private business, but rather to encourage it. Marketing recyclables is a business and, though some parameters are necessary to move recycling forward, telling all recycling centers that they must recycle all of the above items is giving them a business plan that for smaller centers will not succeed. When markets fluctuate, the recycling market fluctuates more and is slower to recover. Recycling centers must have the ability to adjust their product mix to maintain profitability. Profitability to smaller recycling centers means they can meet payroll and keep the doors open, and that has been a challenge in this District since the recession of 2008. The existing law and regulations require a minimum of three mainstream items. District recycling centers already recycle more than that. They all recycle cardboard, all types of paper, plastic bottles, aluminum and tin cans, and electronics at a minimum. Many also recycle glass, textiles, waste motor oil, and large metals. Systems are already in place for waste tires and car batteries, which have evolved over time and demand. Recycling centers may or may not be the designated place for those in all counties. Centers do not need to be required to take items that are not a good fit for their operations, which are often limited by storage space and personnel limitations. That determination should be a local decision based on long term sustainability.

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Recommendation #2 - Require all districts working in association with communities and counties to maintain websites for public access with an updated list of all materials collected, location of collection sites, contact information and alternative disposal options for waste materials. The districts are to ensure that city and county recycling/diversion programs are financially sustainable and are using best management practices.

Legislation will be required. Minor funding may be required.

The White River Solid Waste District web site ([WhiteRiverRecycles.org](http://WhiteRiverRecycles.org)) serves as the District information center for this purpose. The District provides technical assistance on waste diversion and recycling practices and provides grant assistance to these programs. Like other programs, maintaining an up to date web site requires more than minor funding. The District does not operate any waste diversion or recycling centers and cannot “ensure” the sustainability of what it does not own or operate. Recycling markets have always been the #1 influence on sustainability and will continue to be.

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Recommendation #3 - The 10-year goal is to have all incorporated cities with a population of 5,000 or more to offer residential curbside recycling and trash services. Communities of this size must work with the districts to make available convenient opportunities for commercial and multi-family recycling.

Legislation will be required.

The White River District has only a handful of cities with populations above 5,000. Nine municipalities offer curbside recycling now – not based on their population but upon the convenience of a nearby recycling center and upon their financial ability to provide the service. Local governments in this District offer what services they can afford to offer to their citizens. The District’s role in their success has been to educate, encourage and facilitate whenever possible – not to force on them what they cannot financially afford to do. If this becomes a state mandate it will need to be state funded. Recommendation #3 is not a sustainable goal without a state funding stream.

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Recommendation #4 - The 10-year goal is to have all incorporated cities with a population of less than 5,000 offer convenient residential, multi-family, and commercial recycling opportunities, such as drop off locations. This should be done in cooperation with the districts.

This will probably require legislation. Funding should come from the districts.

The District works with its communities to educate, encourage and facilitate recycling and waste reduction programs with the support of local elected officials and citizens. Those efforts have resulted in 25 permanent recycling programs in the District’s ten county service area. If mandated an additional expense at some level will be the enforcement. If this becomes a state mandate it will require additional state funding.

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Recommendation #5 - Districts will encourage the development and implementation of public venue/special event recycling programs. Districts will offer guidance for best management practices, education assistance and information, along with collection and marketing strategies for public venue facilities and special events. Districts will discourage use of non-recyclable items like Styrofoam cups.

Legislation and funding will be required.

The District works with its communities to educate, encourage and facilitate programs including public event recycling. X-Stream portable recycling bins have been provided in every county to be made available to for local public events in the District’s ten counties. District staff has worked with county fairs, community events and even the National Chuckwagon Races. The key to success is local support

and buy-in. This is an on-going education need. If this becomes a state mandate it will require additional state funding.

## **E. Special Materials Subcommittee Recommendations**

### Recommendation #1

Establish a series of workshops and/or a committee to explore the alternative uses of special materials in other states. This recommendation should be implemented in early 2014.

Funding might be necessary for travel.

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Recommendation #2 - Develop an on-going directory of special materials that, if diverted from landfills, would conserve resources and provide an additional market of reusable materials. The use of these materials should follow ASTM standards or other industry criteria. This directory should be ready to go on the ADEQ website by June 1, 2014.

Regulations may need revision. Funding may be required.

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Recommendation #3 - Encourage and incentivize the use of thermal recovery from municipal, commercial and industrial sources.

Legislation may be required. Tax credits and financial incentives will be required.

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Recommendation #4 - Require ADEQ and districts to exercise CERCLA due diligence in the selection, use and operation of recycling and disposal facilities.

Legislation may be required. Funding will be required.

Higher fees and costly permits to generate revenue for ADEQ prohibit business development.

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Recommendation #5 - Develop an illegal dump program that provides additional resources to identify and remediate illegal dumps, while providing education, enforcement, and restricted access to prevent future dumping.

Legislation may be required. Incentives for cities, counties, and RSWMDs will be required.

The most needed incentive is funding for clean-ups that are not private citizen responsibility.

## **F. Education and Public Participation Subcommittee Recommendations**

Recommendation #1 - Implement a statewide media campaign addressing various avenues of solid waste management, including proper disposal, handling special waste streams (paint, sharps, HHW), waste reduction and recycling. The campaign should also address improper/illegal disposal (e.g., burn barrels, burning household wastes etc.). Pick-up Arkansas should be considered as a model.

Funding will be required.

This funding should not be taken from District grant funding and must come from the state.

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Recommendation #2 - Every regional solid waste management district should have an updated, accurate website that provides citizens easy-to-use access to information about recycling, composting, waste reduction and waste management services in their communities. Information should include what materials are accepted, days and hours of operation, physical location, how materials are collected/accepted and contact information for further questions. [Example: White River Regional Solid Waste Management website.]

Maintaining an up to date web site requires more than minor funding and dedicated staff to keep information current.

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Recommendation #3 - Districts should develop partnerships within communities to improve information dissemination.

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Recommendation #4 - Solid waste districts and individual waste management entities (cities, counties, designated recycling collection centers, etc.) should use social media to increase awareness of waste management methods and opportunities.

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Recommendation #5 - Requirements for teaching environmental education in schools should be increased/expanded or established.

Legislation may be required.