

Subject:

Montgomery County, MD
MSW Management System Analysis
Stakeholder Meeting

Department:

N/A

Arcadis Project No.:

30195445.0000

Meeting Location:

Microsoft Teams

Participants:

See **Attachment 1** for
Participant List

Meeting Date:

December 13, 2023

Minutes by:

Jane Wu
Arcadis U.S., Inc.

Issue Date:

January 2, 2024

AGENDA

Item Subject

1. Welcome and Introductions
2. Overview of the MSW Management System Analysis
3. Stakeholder Feedback
4. Discussion
5. Next Steps and Closing

Summary of Meeting/Key 'Take-Aways':

- County Perspective – Intention remains to close/decommission the existing RRF (incinerator) in Dickerson and modernize the County's MSW Management System to focus on leading edge technology to obtain cost effective diversion and recovery of materials and energy from its waste stream. The County recognizes the importance of stakeholder engagement to include ALL of its constituency.
- Stakeholder Concerns – Engagement and participation throughout the process is necessary. Strong preference to see emphasis on 'up-front' programs/processes to reduce waste generation including strong public education campaigns. Focus on technologies is important but not at the expense of ignoring efforts to reduce re-use and recycle.
- Presentation Highlights – Focus on maximizing the value and utility of Derwood and Dickerson properties while achieving goals of cost-effective diversion and recovery of resources and energy from waste. Study is driven by schedule and moves from Technology Assessment and identification/evaluation of waste management processes, cost-benefit analysis to evaluate incremental return on investment for increased diversion, followed by development of alternative MSW systems subject to more rigorous analysis. Intended output is identification of a preferred MSW system which will be subject to procurement via RFP.
- Next Steps – The County understands the urgency of requested changes to how MSW is being managed, commits to expanded stakeholder engagement plan and updates on progress being made on both the Arcadis and B&L efforts.

Detailed Meeting Notes:

Slide presentation is included in **Attachment 2**.

1. WELCOME & INTRODUCTION by JON MONGER (Slide No. 1 to 4).

All attendees provided introductions.

- Barton & Loguidice's role is to supplement DEP resources necessary to perform operations and concurrently the analysis/transformation of Montgomery County's solid waste system.
- Emphasized that the goal is to close the incinerator but provide a comprehensive approach to solid waste management with the appropriate technologies and new waste diversion programs.
- The analysis will be a robust and transparent process.

- The County is in process of building a stakeholder engagement plan that will bring in representation of all of the diverse county interests moving forward.

2. OVERVIEW OF MSW SYSTEM BY ARCADIS (Slide No. 5 to 14)

Summary/Overview of Analysis & Approach (Slide No. 5 to 7)

- Adaptation of Shady Grove Transfer Station and Dickerson – The intent is to maximize value and utility of existing County assets. Primary focus is on adaptation of the Shady Grove Transfer Station Tipping Floor followed by Re-Use of Dickerson Property after Resource Recovery Facility (RRF) is Decommissioned.

Derwood Transfer Station/Enhanced Diversion/Recovery of Resources & Energy (Slide No. 8 to 11)

- Technologies (Slide 8)
 - Examples of technologies being considered including Mixed Waste Processing, In-Vessel Composting, and Mechanical-Biological Treatment (MBT)/Materials Recovery & Biological Treatment (MRBT).
- Assessment & Procurement of Technologies (Slide 9)
 - The technology assessment includes identification of constraints/limitations, preliminary cost, and adaptability to Montgomery County.
 - Two Step procurement process.
 - Step 1 of 2 is Technology Based REOI for adaptation of Derwood facility.
- Cost -Benefit Analysis of Short-Listed Viable Technologies (Slide 10)
 - Intent is to evaluate the incremental cost of increasing diversion, as well as how the reduction in waste tonnage subsequent to enhance diversion will impact the economics of RRF.
 - Typical analyses include cost/benefit ratio, return on investment, buy-back period.
 - Comparison will be made to baseline disposal via transfer and long-haul of MSW to an out-of-county location.
 - The outcome of the cost benefit analysis will be identification of preferred technologies which will be used to develop a series of alternative MSW systems for detailed analysis.
- Detailed Analysis of Alternative MSW management Systems (Slide 11)

- Process outlined including adaptation strategies, conceptual design, evaluation based upon established criteria and model, resulting in identification of a preferred MSW system for use in Step 2 of procurement process.
- Evaluation criteria identified.
- Evaluation model will be developed to assign weighting to various criteria.

Dickerson Re-Use Post RRF Decommissioning (Slide 12)

- Presented 4 additional technologies for consideration at Dickerson which will be subject to cost-benefit analysis:
 - Expanded Residential Organic Composting
 - Anaerobic Digestion (AD) w Renewable Natural Gas (RNG) or Hydrogen from Biogas
 - CDD Recycling
 - Solar Farm with Electricity/Hydrogen

Implementation Phase (Slide 13)

- Procurement/Request for Proposals (Step 2 of 2) is the development of RFPs to implement the preferred MSW System:
 - RFP Package 'A' for the Adaption of Derwood Transfer Station (developed by Arcadis)
 - Package 'B' for the Supplemental Diversion Technologies with Resource Recovery & Green Energy Development at Dickerson (managed by Barton & Loguidice).

Milestones (Slide 14)

Approximate Timeline shown reflects an aggressive schedule. Milestone for various procurement efforts (REOI/RFP) reflect issuance of documents and does NOT include time for respondents or evaluation of responses.

3. STAKEHOLDER FEEDBACK (Slide No 15 & 16)

The following stakeholder groups provided feedback.

- **Zero Waste Montgomery County (ZWMC) – Amy Maron:**
 - Active stakeholder engagement is vital for this process, and the aim is not to slow down the process, but to be helpful and environmentally responsible.
 - Any plans must minimize not only GHGs but also other pollutants.

- Any plans must adhere to the Zero Waste International Alliance definition of Zero Waste.
 - Support a C&D ordinance and resource recovery park.
 - Any attempt to salvage residuals should not result in burning, including pyrolysis/gasification.
 - Goal of the contract should not be energy recovery.
 - Concern about the placement of any additional landfills.
 - Concerned about what metrics and what will be included in the CBA when comparing disposal options.
- **Solid Waste Advisory Committee (SWAC) – Carol Jones:**
 - SWAC has no official position on the preferred technologies.
 - Members of SWAC find that both incineration and landfill have significant negative impacts to the public.
 - SWAC wants careful analysis of all options including extending the Covanta contract as well as alternative technologies for resource recovery.
 - Any plan should include social and environmental justice considerations.
 - They agree that the plan for the Alternative Analysis SOW seems consistent with this approach.
 - SWAC wants to prioritize the waste hierarchy. Sees substantial opportunity for food waste diversion with the major benefit of methane prevention.
 - Would like to see 4 elements to promote zero waste including (1) up front policies and programs to promote zero waste, (2) identification of performance goals, (3) intensive public campaigns and (4) hiring of sufficient staff and contractors to further move toward zero waste.
- **Sugarloaf Citizens Association (SCA) – Lauren Greenberger:**
 - SCA is in line with statements from ZWMC and SWAC.
 - Suggestion to divert a fraction of the funds going to the RRF to education and community engagement.
 - Concerns about Mixed Waste Processing as it is not the highest and best use of materials - the materials recovered are already contaminated at that point.

- Does not want to get to 70% diversion before shutting down the incinerator and shipping off material to landfill. Believes that the incinerator should be shut down as soon as possible and be intentional about building diversion options, especially with more front-end diversion options. Notes that incineration has other pollutants beyond GHG of concern.

- **Energy Justice Network – Mike Ewall:**
 - Echoed earlier comments that the zero-waste advocacy community needs to be a regular part of the planning process.
 - Did not see changes to the SWMP in the SOW for Arcadis.
 - Noted concerns about reducing exclusions in the new REOI that were included in the previous REOI.
 - Noted concerns about the emissions model being used and that it focuses only on CO2 equivalent.
 - Want to make sure front-end technologies are being focused on, not just back-end technologies.
 - Discussed management of organic residuals through anaerobic digestion to stabilize materials and reduce methane in landfills (as opposed to material recovery and beneficial re-use).

- **Dickerson Area Facilities Improvement Group (DAFIG) – Dick Hill:**
 - There is a perception that the agricultural reserve area is an empty space to be used for something when it's prime agricultural land.
 - Dickerson is a small area in terms of voting population, and it seems that the County continues to impose in that area: a composting facility, an incinerator, and a power plant gives it a very industrial feel.

4. DISCUSSION

Comments received in advance of the various stakeholders, as well as reference documents provide by them are summarized in **Attachments 3 and 4**, respectively. The following includes topics of additional open discussion provided by various attendees:

- Neil Seldman from ZWMC noted the existence of cities and counties at 60-80% diversion without the use of Mixed Waste Processing. He added that community input is a dialogue, not a presentation and a response. He hopes there will be working sessions down the road with meaningful dialogue.
- Clarification was provided that the SOW includes figuring out a timeline for closing the RRF.
- Clarification was provided that an analysis needs to be done for the 30-year cost of operating the RRF as a comparison for the cost of shutting down the RRF and implementing new technologies.
- A question was asked regarding if health impacts will be considered as part of the analysis. Karyn Riley from Arcadis responded that there will be public health factors in the Environmental Justice analysis.
- Discussion occurred on next steps for stakeholder engagement. Jon Monger reiterated that the stakeholder engagement plan is still being developed and will include input from the groups as well as others in the broader community, including the County Council.
- William Broglie from DEP clarified that Barton & Loguidice will be creating a schedule to manage future changes including the SWMP and that this schedule will be made public.
- A question was asked regarding what pollutants and risks will be included in the Environmental Justice analysis. Karyn Riley from Arcadis shared that it was too early to determine the evaluation model.
- Staff reiterated that Barton & Loguidice was hired to program manage DEP's ongoing transformation process including developing actionable plans to bring forward C&D Debris recycling, a resource recovery park, collection contracts for food scraps, etc.
- ZWMC noted that they are a part of the Climate Coalition of Montgomery County, who is looking to support the process and help with policy and public education.

5. NEXT STEPS AND CLOSING (Slide No. 17)

Jon Monger from DEP and Debbie Spielberg from the County Executive office provided some closing statements on future opportunities, appreciation of ongoing partnerships, and need

RECORD OF MEETING

to always be in conversation. The County understands the schedule and urgency of the changes needed.

ATTACHMENT 1
PARTICIPANT LIST

RECORD OF MEETING

External Stakeholders:

- In-Person Attendees included the following:
 - Susan Eisendrath, Zero Waste Montgomery County (ZWMC)
 - Amy Maron, Zero Waste Montgomery County (ZWMC)
 - Carol Jones, Solid Waste Advisory Committee (SWAC)
 - Chaz Miller, Solid Waste Advisory Committee (SWAC)
- Virtual Attendees:
 - Neil Seldman, Zero Waste Montgomery County (ZWMC)
 - Carrie Maslen, Zero Waste Montgomery County (ZWMC)
 - Adam Diamond – Solid Waste Advisory Committee (SWAC)
 - Richard Hill, Solid Waste Advisory Committee (SWAC) / Dickerson Area Facilities Improvement Group (DAFIG)
 - Steve Findlay, Sugarloaf Citizens Association (SCA)
 - Lauren Greenberger, Sugarloaf Citizens Association (SCA)
 - Mike Ewall, Energy Justice Network (EJN)

Montgomery County (In-Person unless otherwise noted):

- Jon Monger, Director DEP
- William Broglie, Deputy Director DEP
- Debbie Spielberg, Special Assistant to County Executive
- Cindy Marie Pena, Communications Director DEP (Virtual)

Barton & Loguidice:

- Steve Lezinski (In-Person)

Arcadis:

- Steve Nesbitt (In-Person)
- Karyn Riley (In-Person)
- Jane Wu (Virtual)

ATTACHMENT 2
SLIDE PRESENTATION



DEPARTMENT OF
ENVIRONMENTAL PROTECTION
MONTGOMERY COUNTY • MARYLAND

MSW Management Systems Analysis

Stakeholder Engagement Meeting –12.13.2023



Aiming for Zero Waste

A Vision for Sustainable Materials
Management in Montgomery County

WELCOME & INTRODUCTIONS

JON MONGER, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL PROTECTION



Agenda

1. Welcome and Introductions (10 minutes)
2. Overview of MSW Management System Analysis (20 minutes)
3. Stakeholder Feedback (30 Minutes)
4. Discussion (20 minutes)
5. Next Steps and Closing (10 minutes)



Overview of MSW Management System Analysis



Aiming for Zero Waste

A Vision for Sustainable Materials Management in Montgomery County

JON MONGER, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL PROTECTION





**Sustainable
project choices**

MSW Management System Analysis Montgomery County, MD DEP

Stakeholder Engagement Meeting – December 13, 2023

Steve Nesbitt, Vice President

SUMMARY/OVERVIEW OF ANALYSIS & APPROACH

Adaptation of Shady Grove Transfer Station Tipping Floor



Site Visits/Condition Assessments

Opportunities

Constraints & Limitations

MSW System Data

Waste Composition

Tonnage/Generation

Overview

Derwood

Dickerson

Implementation

Schedule



SUMMARY/OVERVIEW OF ANALYSIS & APPROACH

Re-Use of Dickerson Property after Resource Recovery Facility (RRF) is Decommissioned



Resource Recovery Facility & Railyard

Composting Facility

Overview

Derwood

Dickerson

Implementation

Schedule



ENHANCED DIVERSION/RECOVERY OF RESOURCES & ENERGY

Technologies

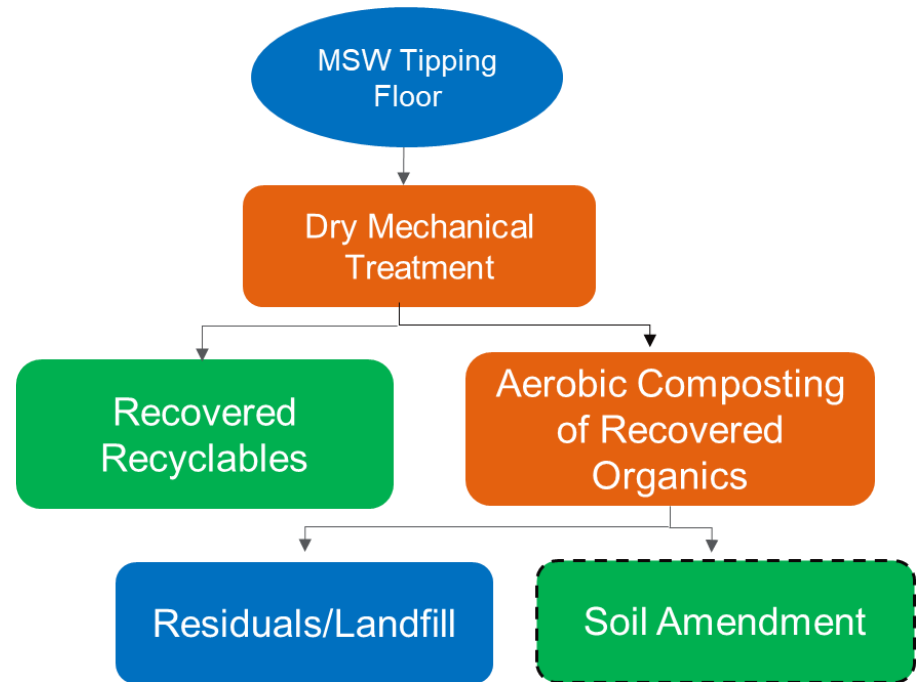


Mixed Waste Processing



In-Vessel Composting

Mechanical-Biological Treatment



Overview

Derwood

Dickerson

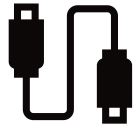
Implementation

Schedule



ENHANCED DIVERSION/RECOVERY OF RESOURCES & ENERGY

Assessment & Procurement of Technologies



Technology Assessment



Short-List of Viable MSW Processing Technologies Which are Adaptable to Montgomery County and Shady Grove Transfer Station Tipping Floor



Procurement Strategy/Approach



Step 1 of 2 - Request for Expression of Interest (Technology Based)

Overview

Derwood

Dickerson

Implementation

Schedule



ENHANCED DIVERSION/RECOVERY OF RESOURCES & ENERGY

Cost-Benefit Analysis of Short-Listed Viable Technologies

- ➔ Cost-Benefit Ratio
- ➔ Return on Investment
- ➔ Buy-Back Period
- ➔ Impact of Diversion & Reduced Waste Tonnage on RRF Economics



Comparison to MSW Disposal Baseline

Transfer & Long-Haul MSW Out-of-County

Preferred Technologies for Building an **Enhanced MSW Management System**

Overview

Derwood

Dickerson

Implementation

Schedule



Evaluation of Alternative MSW Management Systems Incorporating Preferred Processing Technologies



Evaluation Criteria

Lifecycle Cost of Service

NPV \$/Ton
EAC

Waste Diversion

% Diversion & ROI
for Incremental
Amounts

GHG Emissions Carbon Footprint

Carbon Dioxide
Equivalent per Ton
MSW Processed

Environmental Justice

Includes
Destination &
Route/Pathway

Qualitative Considerations

Includes
Regulatory,
Technical & Policy
Considerations

Overview

Derwood

Dickerson

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DICKERSON RE-USE POST RRF DECOMMISSIONING

Cost-Benefit Analysis Diversion and Resource Recovery



Expanded Residential Organics Composting

Anaerobic Digestion w
RNG/Hydrogen from
Biogas



CDD Recycling

Solar Farm
Electricity/Hydrogen



Overview

Derwood

Dickerson

Implementation

Schedule



PROCUREMENT

REQUESTS FOR PROPOSALS (STEP 2 of 2)

RFP Packages

**REOI
Technologies
(Step 1 of 2)**

**'A'
Derwood**

Adaptation of Derwood
Transfer Station

**'B'
Dickerson**

Supplemental Diversion w/
Resource Recovery & Green
Energy Development

Overview

Derwood

Dickerson

Implementation

Schedule



MILESTONES

APPROXIMATE TIMELINE

Activity	Approx. Completion	Output
MSW Processing Technologies REOI	January-February 2024	REOI Issuance
Derwood Adaptation RFP	Late July 2024	Vendor/Cost/Implementation
Alternatives Analysis Report	Late Summer 2024	Detailed Analysis/Documentation

Overview

Derwood

Dickerson

Implementation

Schedule



Stakeholder Feedback and Discussion

KARYN A. RILEY, ESQ., VP

ARCADIS



Stakeholder Feedback



Please limit comments to no more than **5 minutes** per organization.



Please allow for all voices to be heard during the facilitated discussion.



Please email any questions or observations that were not addressed to **Jane.Wu@arcadis.com** by Friday, December 15th.



NEXT STEPS AND CLOSING

JON MONGER, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL PROTECTION



ATTACHMENT 3

SUMMARY OF COMMENTS RECEIVED IN ADVANCE BY STAKEHOLDERS

Inventory of Stakeholder Comments

The following table provides an inventory of Montgomery County written stakeholder comments responding to the Arcadis SOW. Submissions are inclusive through December 15, 2023.

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
1	Email from Lauren Greenberger (Sugarloaf Citizens Association) to Jon Monger (Montgomery County) and Jane Wu (Arcadis) on Dec 10, 2023	Sugarloaf Citizens Association	Steven Findlay; Lauren Greenberger	<p>In reading the scope of work we can see that Arcadis is charged with evaluating alternative waste management strategies including mixed waste processing and mechanical biological treatment of trash with conversion of combustible biogas. It is our understanding that the fundamental reason for looking at these technologies is to find strategies that will reduce our volume of trash to just 30% of what we currently produce before sending it to landfill. This is, of course, a laudable goal and we are 100% with you in trying to achieve that goal with a suite of zero waste strategies. In fact, based on the report prepared for the County Executive last December, "Closing Montgomery County's Incinerator and Implementing Zero Waste", if the County follows the detailed road map that the consultants provided, we can get from our current 38% diversion rate to 80%. This plan involves food scrap composting in backyards, commercial settings, on farms and in a County facility; C&D recycling; a universal collection system; pay-as-you-throw unit pricing; a resource recovery park and a dramatically expanded plan for community outreach (absolutely essential to increase compliance). Nowhere in that plan is recommended mixed-waste processing or mechanical biological treatment of trash. This Consulting Group and also the group that developed the Beyond Incineration report, carefully considered those technologies and determined that they were unproven and too costly to include in a responsible plan for the County. The road map presented by the Zero Waste Consulting Group will get us to our goal. It is highly unlikely, however that we can reach that goal by April of 2026.</p> <p>It is unrealistic to expect to get diversion down to 30% in the next two years. We must work towards that goal but in the meantime, we have to reasonably accept that we will need send a greater amount of trash to landfill in the beginning and work toward that 30% goal as we fully implement the recommendations in the Zero Waste report.</p>

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
2	Email from Lauren Greenberger (Sugarloaf Citizens Association) to Jon Monger (Montgomery County) and Jane Wu (Arcadis) on Dec 10, 2023	Sugarloaf Citizens Association	Steven Findlay; Lauren Greenberger	Given these conditions, we look forward to Arcadis aggressively working to find an appropriate hauler to take our trash either via truck or rail to a landfill that meets at least minimal environmental justice criteria as laid out in the Beyond Incineration report (and adopted by the County in issuing the REOI for a hauler last year). We encourage you to revisit the Republic proposal that was submitted. This was a good comprehensive proposal in which they offered to run the transfer station as well as transport our trash to a landfill. The landfill they chose was not appropriate based on the County's EJ criteria but it is likely that the County could work with Republic to find another more appropriate pre-existing landfill site.
3	Email from Lauren Greenberger (Sugarloaf Citizens Association) to Jon Monger (Montgomery County) and Jane Wu (Arcadis) on Dec 10, 2023	Sugarloaf Citizens Association	Steven Findlay; Lauren Greenberger	<p>In the scope of work, we note that Arcadis is being asked to consider Site 2 as a landfill to be developed in the County. We oppose this initiative for multiple reasons which are carefully laid out in the Beyond Incineration (BI) report. The strongest arguments against using this location include:</p> <ul style="list-style-type: none"> a) The site sits atop our sole source aquifer from which all the drinking water in the surrounding region comes including the town of Poolesville. If this water were to be contaminated the region would become uninhabitable. b) There are many large private landfills available in more sparsely populated areas in the region (see BI report for a list of dozens the authors identified and evaluated). Our goal should be to do the least harm; there is no reason to construct a new landfill at this juncture. The environmental impact of long-distance hauling is minimal compared to incineration (see p. 56, BI report). According to estimates made several years ago, the development of Site 2 as a landfill site (820 acres) would take many years and cost \$1,000,000 an acre. For a site that only has a receiving capacity of approximately 20 years this seems like an unwise investment.
4	Email from Lauren Greenberger (Sugarloaf Citizens Association) to	Sugarloaf Citizens Association	Steven Findlay; Lauren Greenberger	In section 5.1 there is reference to an evaluation model for various waste management strategies. In your letter to us dated December 1st you say that there will be "an assessment of alternative waste diversion technologies and disposal methods, an environmental justice analysis, and the life cycle costs for each alternative". We applaud this analysis and commend you to use the MEBCalc model that Dr. Jeffrey Morris

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
	Jon Monger (Montgomery County) and Jane Wu (Arcadis) on Dec 10, 2023			developed and used to evaluate the Montgomery County RRF a couple of years ago. We have looked to find other life cycle analysis models and have found none as comprehensive as this one. If you have a different model you plan to use, we would very much like to see that. The MEBCalc model has been used in numerous jurisdictions around the United States and Canada to evaluate the true costs of waste management strategies including not just the environmental costs but also the health costs to the population. A review of his work for Montgomery County can be found in the BI report. This past year, he just completed an analysis for waste management strategies in Pennsylvania with which we could provide you.
5	Email from Lauren Greenberger (Sugarloaf Citizens Association) to Jon Monger (Montgomery County) and Jane Wu (Arcadis) on Dec 10, 2023	Sugarloaf Citizens Association	Steven Findlay; Lauren Greenberger	In reviewing the scope of work, we see only one instance of stakeholder engagement and that is the meeting that is planned for December 13th in which a select small group of stakeholders are asked to present their perspectives for 3 minutes each. This can only be seen as a snub of a group of stakeholders who have worked diligently with the DEP and the County Executive for the past eight years to advance this new zero waste management strategy. We advise that you include representatives of stakeholder groups throughout this process. There should be stakeholders at the table as Arcadis reviews and develops waste management recommendations, for the Procurement Workshop and during the process of drafting and evaluating any RFP's. One suggestion would be to have a stakeholder representative participate in each of the key steps that Arcadis is taking. This person could act as a liaison between the DEP, Arcadis and stakeholder groups.
6	Email from Lauren Greenberger (Sugarloaf Citizens Association) to Jon Monger (Montgomery County) and Jane Wu (Arcadis) on Dec 10, 2023	Sugarloaf Citizens Association	Steven Findlay; Lauren Greenberger	The timeline in the scope of work does not include a review and revision of the 10-year Solid Waste Management Plan that must be modified before there can be a change of waste management strategies nor is there a provision for bringing the proposals to the County Council for review and approval. This latter step, in particular, is a place where stakeholder engagement will be critical.

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
7	Email from Lauren Greenberger (Sugarloaf Citizens Association) to Jon Monger (Montgomery County) and Jane Wu (Arcadis) on Dec 10, 2023	Sugarloaf Citizens Association	Steven Findlay; Lauren Greenberger	In the schedule you sent, it indicates that an REOI was completed on 10/9/23. Please explain who did this and what it was for.
8	Email from Lauren Greenberger (Sugarloaf Citizens Association) to Jon Monger (Montgomery County) and Jane Wu (Arcadis) on Dec 10, 2023	Sugarloaf Citizens Association	Steven Findlay; Lauren Greenberger	<p>There is no provision for determining the actual costs of continuing to run the RRF and no analysis planned highlighting the reduced health risk that will ensue with its closure. We know that establishing cause of morbidity and mortality is very difficult, however, we do know that the toxins emitted by the incinerator such as mercury, dioxins, furans and nitrogen oxides are unquestionably linked to both illness and death. Close to home, a study in the Baltimore area established that Wheelabrator was responsible for millions of dollars in respiratory illness linked to elevated levels of fine particulate matter in the region surrounding the incinerator. The 2016 Montgomery County health survey https://www.montgomerycountymd.gov/HHS/Resources/Files/Reports/PopHealthReportFINAL.pdf showed significantly elevated levels' of respiratory illness and cancer in the two zip codes surrounding the incinerator.</p> <p>Both of these - a cost analysis and a health risk analysis — will be essential in bringing the case to both the community and the County Council for incinerator closure.</p>
9	Email from Lauren Greenberger (Sugarloaf Citizens Association) to Jon Monger (Montgomery	Sugarloaf Citizens Association	Steven Findlay; Lauren Greenberger	Finally, we would like an explanation of what exactly the program management consultant, Barton and Loguidice will be doing for the County. Section 1.2 says that they will develop program management documentation such as program management plans, quality plans, master schedule plus individual capital projects or operational program plans. Please explain what this means in concrete terms?

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
	County) and Jane Wu (Arcadis) on Dec 10, 2023			
10	Letter from Amy Maron (Zero Waste Montgomery County) to Jane Wu (Arcadis) on Dec 8, 2023	Zero Waste Montgomery County	Amy R Maron	We are very concerned that the Scope of Work includes only a single meeting with stakeholders and that \$10,000 has been budgeted for this task. Most of us have been working on zero waste issues for many years and we bring significant skills and expertise to the table. We consider ourselves zero waste leaders in the community and are deeply connected to other environmental and civic organizations in the County. Community buy-in and acceptance of any final plan will require close involvement of affected groups such as ours at regular and critical intervals in the development of alternatives. We strongly suggest appointing a stakeholder representative to attend meetings where any new REOIs and RFPs are developed and the responses are evaluated. Draft REOI and RFP proposals should be shared with community stakeholder groups to review and comment on before the final products are issued. The stakeholder representative should be invited to attend meetings, provide some feedback and be a link to other stakeholder groups. This would give transparency to the process without causing delay or logistical difficulties.
11	Letter from Amy Maron (Zero Waste Montgomery County) to Jane Wu (Arcadis) on Dec 8, 2023	Zero Waste Montgomery County	Amy R Maron	We are unclear about the role of the management consultant, Barton and Loguidice (B&L) in this project. We have not seen a scope of work explaining this firm's tasks. In the body of the Arcadis proposal it says B&L will be responsible for "development of program management documentation such as program management plans, quality plans, master schedule, individual capital project or operating project plans. "We would like to learn more about these tasks and how they differ from the tasks performed by Arcadis.
12	Link in the Letter from Amy Maron (Zero Waste Montgomery County) to Jane Wu (Arcadis) on Dec 8, 2023	Zero Waste Montgomery County	Kelly Doordan (Author needs to be confirmed, Commented as "k")	Is the county moving toward zero waste "by adopting a technology plan "to maximize "diversion via enhanced resource and energy recovery" or is the plan to move toward zero waste and use this SOW to identify and evaluate proven technologies to manage the residuals (after maximized diversion)? Setting a goal to maximize energy recovery will yield a different result than setting a goal to identify a systems-focused "circular" approach and processes that maintain the highest and best use of materials for as long as possible.

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
	<p>ARCADIS SCOPE OF WORK</p> <p>“It is our understanding Montgomery County wants to dramatically change its existing municipal solid waste (MSW) management system and move toward a zero-waste model by adopting a <u>Technology Plan</u> which maximizes waste diversion via enhanced resource and <u>energy recovery</u> and minimizes the quantity of residual waste materials which require disposal by conventional methods.”</p>			

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
13	<p>Link in the Letter from Amy Maron (Zero Waste Montgomery County) to Jane Wu (Arcadis) on Dec 8, 2023</p> <p>ARCADIS SCOPE OF WORK</p> <p>"It is our understanding Montgomery County wants to dramatically change its existing municipal solid waste (MSW) management system and move toward a zero-waste model by adopting a <u>Technology Plan</u> which maximizes waste diversion via enhanced resource and <u>energy recovery</u> and minimizes the quantity of residual waste materials which require disposal</p>	Zero Waste Montgomery County	Mike Ewall	<ol style="list-style-type: none"> 1) The idea that this social problem is fixable by a single technology is what results in false solutions like "waste-to-energy" and "waste-to-fuels" schemes, mixed waste processing, and the like. Zero waste is a set of policies and programs, largely upstream, and is more about social engineering than the type of engineering Arcadis is focused on. This scope of work exemplifies why Arcadis was the wrong choice, and why the RFP itself is asking the wrong questions. 2) "Energy recovery" is code word for "burning," which is exactly what we're trying to get away from. Material reduction, reuse, and recovery (recycling/composting) does far more to reduce energy demand than can be "recovered" by burn processes. This has been documented in published research years ago by Dr. Jeffrey Morris.

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
	by conventional methods.”			
14	<p>Link in the Letter from Amy Maron (Zero Waste Montgomery County) to Jane Wu (Arcadis) on Dec 8, 2023</p> <p>ARCADIS SCOPE OF WORK</p> <p>“It is our understanding Montgomery County wants to dramatically change its existing municipal solid waste (MSW) management system and move toward a zero-waste model by adopting a <u>Technology Plan</u> which maximizes waste diversion via enhanced resource and <u>energy recovery</u> and minimizes the quantity of</p>	Zero Waste Montgomery County	Amy R Maron	Is "energy recovery" being used here to cover something like anaerobic digestion? Please explain why this term is being used?

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
	residual waste materials which require disposal by conventional methods.”			
15	<p>Link in the Letter from Amy Maron (Zero Waste Montgomery County) to Jane Wu (Arcadis) on Dec 8, 2023</p> <p>ARCADIS SCOPE OF WORK</p> <p>“It is our understanding Montgomery County wants to dramatically change its existing municipal solid waste (MSW) management system and move toward a zero-waste model by adopting a <u>Technology Plan</u> which maximizes waste diversion via enhanced resource and</p>	Zero Waste Montgomery County	Mike Ewall	<ol style="list-style-type: none"> 1) The county already did this last year and learned that there's nothing viable out there -- just one sketchy company with a track record of failure and an unrealistic proposal that MES found too risky. 2) Does Arcadis have anything comparable to the MEBCalc model used to evaluate nine health and environmental criteria for the Beyond Incineration report? If not, why are they paying to redo this analysis?

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	<p><u>energy recovery</u> and minimizes the quantity of residual waste materials which require disposal by conventional methods.”</p>			
16	<p>Link in the Letter from Amy Maron (Zero Waste Montgomery County) to Jane Wu (Arcadis) on Dec 8, 2023</p> <p>ARCADIS SCOPE OF WORK</p> <p>“It is our understanding Montgomery County wants to dramatically change its existing municipal solid waste (MSW) management system and move toward a zero-waste model by adopting a <u>Technology Plan</u> which maximizes</p>	Zero Waste Montgomery County	Amy R Maron	Please explain why another REOI will be developed.

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
	waste diversion via enhanced resource and <i>energy recovery</i> and minimizes the quantity of residual waste materials which require disposal by conventional methods.”			
17	3) MSW Management System Development via Adaptation of Derwood and Dickerson Assets	Zero Waste Montgomery County	Mike Ewall	How is Arcadis qualified to do an environmental justice analysis? Why would this need to be done again when the Beyond Incineration report already did that?
18	3) MSW Management System Development via Adaptation of Derwood and Dickerson Assets	Zero Waste Montgomery County	Amy R Maron	Please describe the planned EJ evaluation approach.
19	4) Procurement	Zero Waste Montgomery County	Lauren Greenberger Amy R Maron (Agree);	Request stakeholder input into RFP and review of responses.

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
			Mike Ewall (Agree)	
20	5) Implementation Plan	Zero Waste Montgomery County	Mike Ewall	The term "integrated" has no place here. It's insider lingo that means that incineration is part of a waste system. The word is only used by those who understand this meaning, or those who mindlessly copied it from those who understood such an intent.
21	Task 1 –Project Management 1.4 Meetings	Zero Waste Montgomery County	Carrie Maslen	Stakeholders to be included.
22	Task 2 –Local Organized Stakeholder Participation	Zero Waste Montgomery County	Mike Ewall	<ol style="list-style-type: none"> 1) Who is considering it "important" to be seeking out local stakeholders that advocate for "energy recovery" (burn) technologies? Do they even exist? 2) We already provided objective criteria in the Beyond Incineration report, discussed them with DEP (under Ortiz) and got near-perfect agreement, and had them incorporated into the county's REOI contracting process when the zero waste consulting team was still under contract and allowed to provide feedback on the contracting language. Don't let this language get lost or replaced!
23	Task 2 –Local Organized Stakeholder Participation	Zero Waste Montgomery County	Kelly Doordan (Author needs to be confirmed, Commented as "k")	What are the objective criteria for considering information provided by organized stakeholders?
24	Task 2 –Local Organized Stakeholder Participation	Zero Waste Montgomery County	Amy R Maron	(In regard to objective criteria) Please see the original REOI, located in the shared drive we provided.

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
25	2.2 Implementation of the Engagement Plan	Zero Waste Montgomery County	Lauren Greenberger	No follow up or continuing dialog with stakeholders?
26	2.2 Implementation of the Engagement Plan	Zero Waste Montgomery County	Amy R Maron	A single meeting with stakeholders is not sufficient. Energy Justice, ZWMC and other individuals have been deeply involved in moving the U.S. from incineration toward zero waste for seven years now. A single meeting cannot scratch the surface, and sounds like a checkbox, not true engagement. We've provided detailed timelines, criteria, contract language, evaluations, and more over the past several years and some has been considered, while others (the timeline) still await feedback and DEP's commitment. We welcome working through all of this, but it will take more than a single meeting. We need to be meeting at least monthly to have meaningful participation.
27	Task 3 Increased Diversion and MSW Processing Technology Evaluation 3.1 Cost Benefit Analysis	Zero Waste Montgomery County	Amy R Maron	Again, what is meant by "energy recovery" if incineration is no longer a technology being considered?
28	Task 3 Increased Diversion and MSW Processing Technology Evaluation 3.1 Cost Benefit Analysis	Zero Waste Montgomery County	Mike Ewall	Replace all "resource and energy recovery" with "material recovery." "Energy recovery" means burning, and "resource recovery" (which meant recycling back in the 1980s) also now means burning, as the name has been inappropriately slapped on many trash incinerators (such as MCRRF) and a number of states also call incinerators "resource recovery facilities," even though they are resource destruction facilities.

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
29	3.1.1 Request for Expression of Interest (REOI)	Zero Waste Montgomery County	Amy R Maron	Is this the REOI that was already issued or is there another one anticipated?
30	"An REOI will be developed for the County's use in soliciting responses from vendors and operators capable of providing the range of resource and/or energy recovery technologies previously specified in Attachment A, Section A-1 (not including Durable Goods Reuse and Recycling)."	Zero Waste Montgomery County	Mike Ewall	Replace with "material."
31	3.1.2 Evaluation of Responses to the REOI "Meetings will be facilitated with the County to narrow down the list of prequalified	Zero Waste Montgomery County	Amy R Maron	Why does Arcadis assume more vendors than the few that already responded will respond for this REOI?

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
	vendors to a shortlist of three to five determined to be the most qualified of the respondents. Only shortlisted vendors will be asked to submit a response to any subsequent RFP."			
32	3.1.3 Technical Review	Zero Waste Montgomery County	Amy R Maron	With this focus on technologies, where do programs like Pay as You Throw fit in? Or policies that the county could adopt?
33	"Commercially available technologies to enhance recovery of resources and/or energy from MSW will be identified and evaluated with respect to their potential adaptation to Montgomery County conditions and waste stream characteristics."	Zero Waste Montgomery County	Mike Ewall	Replace with "material."

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
34	Web-based technical literature search and annotated bibliography summarizing the findings of individual cited references.	Zero Waste Montgomery County	Lauren Greenberger	Review of findings in ZW Consultants report. Review of Beyond Incineration Report
35	3.1.4 Cost Benefit Analysis	Zero Waste Montgomery County	Kelly Doordan (Author needs to be confirmed, Commented as "k")	This task order clarifies in section 5.2.1 (p.9) that the lifecycle cost analysis will cover a 30-year planning horizon, so I'm assuming this cost-benefit analysis and ratio is looking also at 30 year horizon, but I'm not aware of a current source to estimate the 30 year avoided cost of disposal using the existing method of management and disposal. Is there an update to the numbers that HDR provided to the county and ZWTF re best estimates for maintenance to keep the incinerator boilers operating another 30 years? The HDR analysis produced several years ago only ran through 2040, but it's probably not reasonable to assume that the incinerator could be extended another 15 years beyond that without significant additional capital investment.
36	<ul style="list-style-type: none"> Impact of diversion and reduced waste tonnage on economics of Waste-To-Energy at 	Zero Waste Montgomery County	Amy R Maron	<ol style="list-style-type: none"> Is this intended to mean the impacts prior to April 2026 that may cause it to close before the end of the contract? If not, it does not matter what the impacts are if the plan is to close the incinerator by then, anyway. Also, please replace all references to "waste-to-energy" with "incinerator." "Waste-to-energy" is an unscientific PR term to pretend that incinerators magically convert matter into energy, violating the laws of physics. Which CBA package will they be using? I think there are many on the market but I'm not up-to-date on the latest.

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
	the RRF located in Dickerson.			
37	Impact of diversion and reduced waste tonnage on economics of Waste-To-Energy at the RRF located in Dickerson.	Zero Waste Montgomery County	Lauren Greenberger	Impact on human, animal and aquatic health. Impact on vulnerable communities.
38	<p>Task 4 – Development of Alternative MSW Management Systems via Adaptation of Derwood and Dickerson Assets</p> <p>“... varying degrees of waste diversion and resource/energy recovery. ... “</p> <p>“... and corresponding levels of waste diversion, resource and/or</p>	Zero Waste Montgomery County	Mike Ewall	Replace with "material."

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
	energy recovery, and cost. ...”			
39	4.3 Conceptual Development of Adaptation Strategies “These will inform subsequent CAPEX and OPEX requirements.”	Zero Waste Montgomery County	Mike Ewall	Spell out. Presumably, this means Health and Safety Protocol?
40	4.3 Conceptual Development of Adaptation Strategies “These will inform subsequent CAPEX and OPEX requirements.”	Zero Waste Montgomery County	Amy R Maron	Please explain CAPEX and OPEX requirements.
41	Task 5 – Evaluation of Alternative MSW Management Systems 5.1 Evaluation Model	Zero Waste Montgomery County	Lauren Greenberger; Amy R Maron (“Agree”)	Share this model for review with community stakeholders.

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
42	Greenhouse Gas Emissions/Carbon Footprint	Zero Waste Montgomery County	Mike Ewall	This is inadequate. GHGs are not the only impact, and this ignores all other health and environmental criteria. Also, if GHG impacts rely on the highly-flawed WARM model that EPA is in the process of re-evaluating, that is even more problematic. Any evaluation model must also look at other major impacts, including those from criteria air pollutants, toxic chemicals, and acid gases. As the lifecycle analysis done with MEBCalc for the Beyond Incineration report did, these should be added up so that they can be presented together on one chart in a monetized form.
43	Other Qualitative Considerations	Zero Waste Montgomery County	Lauren Greenberger	Other toxic emissions or risks related to human and environmental health.
44	Other Qualitative Considerations	Zero Waste Montgomery County	Kelly Doordan (Author needs to be confirmed, Commented as “k”) Mike Ewall (“Agree”)	We should explicitly consider which processes and materials management systems maintain the highest value for as long as possible for each of our post-consumer commodities. With the passage of the Save Our Seas Act in 2020, Congress directed US EPA to develop circular economy strategies to post-consumer materials management. There are a variety of definitions in the literature, but the Save Our Seas Act specifically defines the term as meaning an economy that uses a systems-focused approach and involves industrial processes and economic activities that—(A) are restorative or regenerative by design; (B) enable resources used in such processes and activities to maintain their highest values for as long as possible; and (C) aim for the elimination of waste through the superior design of materials, products, and systems (including business models). At the county level, we can and should include qualitative considerations such as "maintaining the highest value of materials for as long as possible." Adopting processes that incorporate these values will also position us more favorable for future funding that aligns with recent congressional and federal executive action.

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
45	5.2 Detailed Analysis 5.2.1 Lifecycle Cost of Service	Zero Waste Montgomery County	Amy R Maron	Please provide an explanation of this model and where else is has been used.
46	5.2.4 Environmental Justice	Zero Waste Montgomery County	Amy R Maron	What specific tools will be used?
47	5.3 Other Considerations Related to RRF Closure (Attachment A-4)	Zero Waste Montgomery County	Kelly Doordan (Author needs to be confirmed, Commented as "k")	A-4 includes loss of RECs as another lost revenue if the incinerator closes, but councilmembers and executive branch have already indicated that they favor removing waste to energy from Tier 1 RPS and there is regulatory uncertainty whether these credits will remain in place (so not necessarily a sure source of revenue or source of "lost revenue" should the incinerator close)
48	5.3 Other Considerations Related to RRF Closure (Attachment A-4)	Zero Waste Montgomery County	Lauren Greenberger	A review highlighting the reduced risk to human and environmental health that closure of the RRF will produce. This important benefit should be shared with the County Council and the public.
49	5.3 Other Considerations Related to RRF Closure (Attachment A-4)	Zero Waste Montgomery County	Mike Ewall	(In response to Lauren Greenberger's comment) Yes. And this has already been quantified in the MEBCalc LCA results for the Beyond Incineration report.
50	Task 6 – Procurement/ Solicitations	Zero Waste Montgomery County	Mike Ewall	We could all save the time of this exercise and recognize that the back end of the Zero Waste Hierarchy spells out the best thing to do, environmentally, which is material recovery and biological treatment followed by landfilling the residuals. Find this at http://www.zwia.org/zwh

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
				<p>and the science behind it summarized in the "Leftovers" report here: https://ecocycle.org/resources/report-zero-waste-system-leftovers/</p> <p>Report opens directly at this link: https://ecocycle.org/content/uploads/2023/02/Report-Zero-Waste-System-Leftovers.pdf</p>
51	6.1 Procurement Strategy Workshop	Zero Waste Montgomery County	Lauren Greenberger	<ol style="list-style-type: none"> 1) Include a representative of community stakeholders. 2) Outcome of the workshop be available on a website publicly accessible.
52	6.2 Request for Proposals (RFP)	Zero Waste Montgomery County	Lauren Greenberger	RFP draft will be shared with community stakeholder groups for review and comment before finalized.
53	6.2.1 RFP Development	Zero Waste Montgomery County	Mike Ewall	Various stakeholder listed below are just the county government and prequalified vendors. Will the public be given opportunity to review the draft RFP? If that would violate procurement processes, so would giving it to vendors for feedback. If not possible to share draft RFP for public feedback before it goes out, then the zero waste consulting team should be brought back in to provide that input as we did for the REOI.
54	<p>Task 7 – Implementation Plan</p> <p>“Attention will be given to the interim periods leading up to RRF closure when advance technologies are being</p>	Zero Waste Montgomery County	Mike Ewall	Advanced.

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	implemented via various capital projects”			
55	7.1 Short Term Long Haul	Zero Waste Montgomery County	Amy R Maron	Interesting that there is a short-term haul plan.
56	7.1 Short Term Long Haul	Zero Waste Montgomery County	Mike Ewall	If a short-term haul plan is possible, then why does it take 2.5 more years to stop running the incinerator? (it doesn't)
57	7.2 Short Term Extension of RRF Operations	Zero Waste Montgomery County	Amy R Maron	This should not be necessary if a strict timeline to close by 4/26 contract expiration date with plenty of lead time is built in.
58	<p>Task 8 - Reporting/Documentation</p> <p>Discussion of Results including our interpretation/evaluation of collected data and subsequent analyses including MSW Technology Evaluation, cost-benefit of short-listed technologies, and direct comparison</p>	Zero Waste Montgomery County	Mike Ewall	Will key stakeholders have to agree? This model is important and it should be agreed upon by those of us who have put in the most thought and writing on evaluation criteria.

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
	of the various MSW management systems using the previously agreed upon evaluation model.			
59	<p>ATTACHMENT A A-1 Technologies and/or Facilities for Diversion and Enhanced Resource Recovery Which Involve Adaptive Re-Use of the Derwood Property (Shady Grove) including but not limited to the Transfer Building Tipping Floor</p> <p>Mixed Waste Processing (MWP)</p>	Zero Waste Montgomery County	Lauren Greenberger	Would this replace our current system of separating our recyclables?
60	<p>ATTACHMENT A A-1 Technologies and/or Facilities for Diversion and Enhanced Resource Recovery Which</p>	Zero Waste Montgomery County	Mike Ewall	This is in violation of zero waste principles and will be strongly opposed by stakeholder and the general public, which is used to dual stream recycling. The track record of MWP is miserable and results in little being recycled. This should not even be in consideration. The same technology can and

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
	<p>Involve Adaptive Re-Use of the Derwood Property (Shady Grove) including but not limited to the Transfer Building Tipping Floor</p> <p>Mixed Waste Processing (MWP)</p>			<p>should be applied, but only AFTER aggressive source separation for reuse, recycling, and aerobic composting.</p>
61	Mechanical-Biological Treatment (MBT)	Zero Waste Montgomery County	Mike Ewall	<p>The Beyond Incineration report already discusses and recommends Material Recovery and Biological Treatment (MRBT) followed by landfilling the residual, as the Ecocycle "Leftovers" report already documented to be the most environmentally sound way to manage residuals. It also happens to match the back end of the Zero Waste Hierarchy.</p> <p>There are three ways to screw up the back end of a zero waste system using MWP/MBT technology and you are recommending two of them. They are:</p> <ul style="list-style-type: none"> a) Stop source separating waste and expect robots and low-wage workers to sort it all out b) Pretend the organic fraction of municipal waste is clean and appropriate for making "compost-like output" for land application c) Burning the processed residuals. <p>All three must be prohibited. MWP and MBT should be replaced with "MRBT to landfill" where it's specified that this is ONLY to follow extensive source separation and that anaerobic digestion of organic residuals is primarily a preprocessing step to stabilize them, minimizing GHGs and odors in the landfill. It will also have the effect of reducing the water weight and volume of the residuals that have to be shipping to the landfill, shrinking shipping costs. As a side-benefit, the AD system can provide</p>

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				some of the methane or hydrogen sought by the county, should the hydrogen bus scheme ever make sense logistically or financially.
62	Mechanical-Biological Treatment (MBT)	Zero Waste Montgomery County	Lauren Greenberger	We have proposed MRBT at the back-end from the beginning. Is conversion of biogas appropriate and without risk?
63	Mechanical-Biological Treatment (MBT)	Zero Waste Montgomery County	Amy R Maron	I would like to know more about any proposed technologies and where else they have been successfully implemented.
64	Durable Goods Reuse and Recycling	Zero Waste Montgomery County	Amy R Maron	We have already provided a lot of information in our consultant's report.
65	<p>A-2 Technologies for Diversion and Enhanced Resource and Energy Recovery Which Involve Re-Use of the Dickerson Property after the Resource Recovery Facility (RRF) is Decommissioned</p> <p>Diversion and Resource Recovery:</p>	Zero Waste Montgomery County	Lauren Greenberger	Why is AD being considered for commercial and Aerobic composting for residential? AD is 4 x more expensive and pure product cannot be used as compost.

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
66	<p>A-2 Technologies for Diversion and Enhanced Resource and Energy Recovery Which Involve Re-Use of the Dickerson Property after the Resource Recovery Facility (RRF) is Decommissioned</p> <p>Diversion and Resource Recovery:</p>	Zero Waste Montgomery County	Amy R Maron	<p>1) (In supplement to Lauren's comment) And what is the collection plan?</p> <p>2) What is their evaluation of the current condition of C&D waste and would they recommend an ordinance requiring mandatory C&D recycling?</p>
67	<p>A-2 Technologies for Diversion and Enhanced Resource and Energy Recovery Which Involve Re-Use of the Dickerson Property after the Resource Recovery Facility (RRF) is Decommissioned</p> <p>Diversion and Resource Recovery:</p>	Zero Waste Montgomery County	Carrie Maslen	<p>This is the only mention of the word "organics", and the only page with the word "compost" in the document. Should we expect to see an organics / compost section in the timeline?</p>

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
68	Energy Recovery	Zero Waste Montgomery County	Mike Ewall	These don't fit within a municipal waste management plan and seem only to be getting mentioned because the incinerator tract could be converted or these purposes.
69	A-3 Disposal of Residuals	Zero Waste Montgomery County	Kelly Doordan (Author needs to be confirmed, Commented as "k")	Add implications of each of these options as future policy drivers (i.e., transfer and disposal incentivizes waste reduction because cost decreases as waste decreases; economics of waste-to-energy incentivize keeping trash inputs at a certain capacity level intended to maximize cost efficiency of incinerator (so incentives are to keep feeding the incinerator and would need to analyze impact of reduced waste tonnage on economics of waste-to-energy if dropped down to two boilers instead of three, etc.))
70	Transfer and Short-Haul to County municipal solid waste landfill (MSWLF) at Site 2	Zero Waste Montgomery County	Mike Ewall	This should not even be considered, for all of the reasons described in Chapter 6 of the Beyond Incineration report.
71	A-4 Other Considerations Related to RRF Closure	Zero Waste Montgomery County	Lauren Greenberger	<ol style="list-style-type: none"> 1) How will these (considerations) be evaluated? Will biogenic material be discounted as in the WARM model? 2) Glaringly missing here is a LCA of incineration v landfilling. Not one mention of the effects on human health of disposal methods (incinerator, out-of-state landfills, trucking, rail haul, Site 2 landfill on aquifer) 3) Add evaluation of costs to human and animal health of mercury, dioxins, furans, nitrous oxide, fine particulate matter and other toxic emissions.
72	A-4 Other Considerations Related to RRF Closure	Zero Waste Montgomery County	Amy R Maron	Will other models, such as MBCalc be considered?

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
73	A-4 Other Considerations Related to RRF Closure	Zero Waste Montgomery County	Mike Ewall	Is this making the (false) assumption that the MCRFF incinerator reduces GHGs? If so, this needs to be turned on its head and a responsible model must be used, so that it's recognized that the incinerator's closure will reduce emissions, even if all of the waste is rerouted to distant landfills. The Beyond Incineration report documents this.
74	Summary of Total Budget Requirements	Zero Waste Montgomery County	Lauren Greenberger	No line item for LCA of cost of incinerator to continue or to be decommissioned. Isn't this needed for the CC?
75	Summary of Project Schedule	Zero Waste Montgomery County	Kelly Doordan	Where is the solid waste management plan revision in this timeline?
76	Summary of Project Schedule	Zero Waste Montgomery County	Mike Ewall	This schedule is missing many major points in the process of amending the county's solid waste plan as required under state law and the county plan's current conditions. It's also missing the contractual and legal matters between the county and the Northeast Maryland Solid Waste Authority, including the taking of title, state MDE permitting matters, and more. Find these outlined in Tasks 2.1 through 2.13 and Tasks 3.1 through 3.8 in the Zero Waste consultants' report, "Closing Montgomery County's Incinerator and Implementing Zero Waste.
77	Summary of Project Schedule	Zero Waste Montgomery County	Carrie Maslen	Several "end" dates are in the past
78	Engagement Plan	Zero Waste Montgomery County	Daniella Ochoa-Gonzalez	Why does this end on Nov? Does the county has an strategy from this date until 2026?

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
79	Technical Review of Processing and/or Treatment Technologies	Zero Waste Montgomery County	Lauren Greenberger	Already done?
80	Evaluation Model	Zero Waste Montgomery County	Mike Ewall	This is done already? If so, let's see it. We want to give feedback on it.
81	Detailed Analyses	Zero Waste Montgomery County	Mike Ewall	All of these detailed analyses and assessments will get done in just 18 days? Is time being given for acquiring data that is not in hand? This seems very unrealistic.
82	Preliminary Assessment re Potential Adaptation and Use of Alternative Processes/Technologies	Zero Waste Montgomery County	Mike Ewall	Done already? This needs to be revisited. See comments on Appendix A.
83	MCRRF Closure Impacts/Revenue Implications	Zero Waste Montgomery County	Mike Ewall	Needs to include health benefits. It's an unrealistic deadline if you plan to research this yourselves, though you're welcome to not reinvent the wheel and pull the data from the Beyond Incineration report's LCA.
84	GHG Emission Reduction	Zero Waste Montgomery County	Mike Ewall	How is "GHG Emissions Reduction" a loss of revenue? Is the false assumption of the incinerator reducing emissions (even though the emissions are 65% worse than a coal burner per MWh) being used to sell some sort of GHG emissions reduction credit into a market somewhere? If so, please spell out who is selling what to whom, for how much, for how long, and under what program.

Tracking Number	Source of the Comment	Stakeholder Group	Representative Name	Stakeholder Comment
85	Implementation Plan	Zero Waste Montgomery County	Mike Ewall	It's completely unnecessary to go past 4/1/2026. In fact, the contract would be ended much sooner if a more ambitious timeline were applied. None of the necessary legal requirements for the timeline seem to be in here, though

ATTACHMENT 4

**INVENTORY OF REFERENCE DOCUMENTS PROVIDED BY
STAKEHOLDERS**

Inventory of Stakeholder Materials Received

The following table provides an inventory of Montgomery County written stakeholder materials received responding to the Arcadis SOW. Submissions are inclusive through December 15, 2023.

Tracking Number	Stakeholder Group	Representative Name	Submission Date	Reference Document
1	Zero Waste Montgomery County	Amy Maron	12/8/2023	Letter to Jane Wu
2				Comments on Arcadis Scope of Work
3				Life Cycle Analysis for Disposal of MSW_Jeff Morris
4				Zero Waste Montgomery County Responses to SCA Answers to DEP Questions_04.20.2021
5				Beyond Incineration - Best Waste Management Strategies for Montgomery County, MD
6				Strategic Plan to Advance Composting, Compost Use, and Food Scraps Diversion in Montgomery County, MD
7				Northeast Maryland Waste Disposal Authority FY 2022 Budget
8				Montgomery County Zero Waste Consultants Plan
9				Request for Expression of Interest (REOI) for MSW Acceptance, Processing, Transport, and Disposal Services
10				Best Disposal Option for the "Leftovers" on the Way to Zero Waste_Jeff Moris
11				Montgomery County 2020 Waste Flow Diagram and Analysis
12				Zero Waste Montgomery County Biographies
13			12/12/2023	Montgomery County 2020 Waste Flow Diagram and Analysis (Duplicate)
14	Sugarloaf Citizens Association	Lauren Greenberger	12/10/2023	Comments on Arcadis Scope
15				Communication on Stakeholder Engagement
16				Beyond Incineration - Best Waste Management Strategies for Montgomery County, MD
17				Montgomery County Zero Waste Consultants Plan (12.27.2022)
18				Health in Montgomery County 2008-2016