

BURNT

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BUSINESS, AND ACADEMIA

28 October 2008

The Nashville Regional Solid Waste Board is currently developing a '10 Year Solid Waste Plan' [see link, below]. This Plan is not required and to date a Sub-Committee has held two (2) public meetings to evaluate the plan. On Friday 12 September the Sub-Committee sent the Plan back for further review. We appreciate involvement in this process and consideration by the Board.

Please see comments below from BURNT which demonstrate--

A. fundamental numbers by Metro are wrong--this prevents good planning. Ludicrous claim of recycling are grossly exaggerated without a foundation of fact.

B. bad State policies create bad Metro policies--little diversion, excess landfilling, little programs to keep solid waste out of the landfills

C. Class IV Landfilling is out of control and environmental injustice. Why are we landfilling 100,000 tons of concrete and mixed rubble, 56,000 tons of wood, 22,000 tons of drywall, and 5,000 tons EACH of metals, bricks, and plastics?

D. Sewer sludge is an environmental blight. If we can use sewer sludge on out of county and out of state golf courses--why not use it in Nashville? When Nashville LANDFILLED sludge it did not count AGAINST [as landfill] but now that "recycle" as soil "amendment" count as diversion

LINK TO DRAFT NASHVILLE 10 YEAR SOLID WASTE PLAN

http://www.nashville.gov/recycle/pdfs/Davidson_County_SWP_Draft.pdf

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We appreciate that the Regional Solid Waste Board and Public Works are doing a 10 Year Plan, which is not mandatory. We also appreciate that the Board is taking time to consider the Plan. Prior to the next DRAFT, I would like to make several points.

1. Metro is Captive of Poor State Policy

BURNT is active on the State level. We understand that the sloppy reporting policies of the state and the State orientation to profit hungry landfills has created the Metro policy. It could

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not be otherwise. We are disappointed that a Public Works employee has been so active in the Task Force formulating these policies. **We believe this Regional Solid Waste Board should acknowledge in the Plan**

1. numbers are very much estimates not based on fact

2. in 2008, the Metro solid waste policy is highly oriented to landfilling in Class I and Class IV landfills

2. NUMBERS

1. Table 3-1, 'Nashville...2007 Solid Waste Recycling and Disposal Data' [pg. 14] is the key to the Plan. This is what people will examine in 10 years. Yet, these numbers are seriously flawed

A. Metals--

Table 3-1--'Private Sector Recycling' lists 'Ferrous Metals' (pg. 14) [128,000 tons], 'Mixed metals' [26 tons], 'Non-ferrous metals' [7,400 tons], and 'Auto body scrap' [17,000 tons]. Public Program recycling lists 'Metals' [916 tons] for a TOTAL of 153,000 tons of METALS out of a supposed waste stream of 1,287,000 tons. **National averages are METALS as 7.6% of the waste stream or 96,000 tons out of a 1,287,000 ton waste stream.** It is not clear what 'auto body scrap' is. However, a claimed 153,000 tons of metal versus an expected 96,000 tons is a clear deviation from national norms.

B. Basis of this table--

From a view of a 10 Years Plan, it should be made clear Table 3-1 is an estimate and conjecture.

C. Mulch is 75,000 tons of 'Public Recycling'

Mulch, an activity of local government from long ago, is 75,000 tons--70% of public recycling and 20% of total recycling.

Thus, for a Ten Year Plan we urge, strongly urge, the Regional Board to recognize in the Plan that there is no clear knowledge of the waste stream and this is a challenge to future boards.

3. This Plan needs a Clear 'Road Map' To Guide Public Works, the Council, and citizens

A. Discussion by the Sub-committee appeared to accept that "Section 8.3.2 **Food Waste Composting**" and "Section 9.4.1 **Food Waste Composting**" were not at all applicable or specific. We urge a SPECIFIC plan for Nashville to

1. work with large food stores, schools, and fast food outlets to compost food and compostable waste. Every Krogers creates 800-1,000 pounds a week of organic food waste.

2. specific programs for residential, institution, restaurant, and business parks to compost food and yard waste.

Even if this is not implemented NOW, this provides a target and information for planning. Further, compostable food and yard waste create dangerous methane gasses in landfills.

B. Class IV Landfills

1. Table 3-4 [pg. 17] 'Characterization of C & D Waste in Davidson County' estimates we are landfilling 100,000 tons of concrete and mixed rubble, 56,000 tons of wood, 22,000 tons of drywall, and 5,000 tons EACH of metals, bricks, and plastics. Why is any of this landfilled, let alone in a landfill on the river in a black area?

2. A 10 year plan should include specific programs and time-table for stopping these practices.

3. For years we have heard about Public Works plans to work with Codes to develop these programs yet nothing has impacted the situation. We need a professional plan for this

C. Transportation

1. There is no accounting of mileage traveled to transport waste to out of county landfills. The most recent number was 1.12 million miles--statewide exceeds 12 million miles. This is a significant cost and environmental toll which should be documented for the purpose of future review.

2. Section 4.2.2.1 Residential Refuse Collection--[pg. 21] of the Plan states Metro purchased new collection trucks. What was the capitol cost and maintenance?

3. Sewer sludge

We urge the Regional Board to evaluate the moving target definition of sludge [human and business waste] as a solid waste, as a safe form of recycling, and as part of the solid waste solution.

Although the Regional Board has no power to stop the use of sewer sludge on golf courses and agriculture fields, you have the power to place in this Plan a note detailing the possible unhealthy nature of this practice which is more expedient rather than environmental. We urge this material be landfilled.

Thank you for the opportunity to submit this material and participate in this process

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