

BURNT

IMPROVING THE ENVIRONMENT THROUGH
CITIZEN INVOLVEMENT WITH GOVERNMENT,
BUSINESS, AND ACADEMIA

17 January 2009

Mr. John Sherman,
Chair
Metropolitan Nashville Regional Solid Waste Board

Requested Action—Reconsideration of ‘Metro Solid Waste Plan’

Hello Chair John Sherman:

We ask the Regional Solid Waste Board to reconsider the ‘Metropolitan Nashville Solid Waste Plan’ because the basic numbers within the ‘Plan’ are false and fabricated out of whole cloth. The Plan was initially approved by the Board on 18 December 2008 but has not been submitted to the State of Tennessee or apparently approved by the cities in the Region.

This Plan, written by Jeremy K. O'Brien, P.E., Director of Applied Research, SWANA [Solid Waste Association of North America] under supervision of Mike White, P.E. of Gresham Smith and Partners, will govern expenditures of hundreds of millions of dollars by Nashville government and business. The basic numbers are fundamentally false. The Plan was a constantly changing target. In the last two weeks prior to Board consideration, following 18 months of explicit criticism by citizens, the Plan moved from a preposterous claim of 54.4% waste diversion to a claim of 33% “Total Public and Private Recycling”. Both are false and excessive.

We ask a central question: How can Nashville or Tennessee manage solid waste if you do not have an accurate measure of the contents of what is actually recycled, composted, or landfilled? It is impossible to manage what you can not measure.

Our group has repeatedly praised the performance and efforts of this Board. However, approval of this Plan with the fundamental distortion of numbers is gratuitous slap at due process and the environment.

We ask the Board to reconsider this Plan with new consultants who will acknowledge the basic inaccuracy of Tennessee solid waste numbers and focus on real solutions rather than claim empty victories.

Fundamental Errors Now Made Part of Public Policy

A. "Davidson County 2007 Solid Waste and Disposal Data" **TABLE 3-1** [pg. 14] lists recycling
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totals for the private sector and public sector down to 20 pounds--a hundredth of a ton--which is complete fiction. It is absolutely impossible to know the composition of the waste stream down to 20 pounds. For example, **Table 3-1** claims the private sector generates 46,328.58 tons of "Corrugated cardboard" in 2007 and 128,001.17 tons of "Ferrous Metals" which is impossible to know. *Table 3-1 is the key to the entire study.*

B. Table 3-1 claims "Total Public and Private Sector Recycling" is 421,405.46 tons or 33% of the waste stream--again, a completely fabricated number. There is absolutely no way Metro Nashville recycles 33% of the waste stream.

C. Table 5-2 [pg. 39] claims that from year 2008 to year 2017 ALL [100%] industrial recyclables will be recycled. This is an incredible claim which has no basis in fact or reality. This false claim is a strategy to justify and camouflage high landfilling.

D. The engineers did not consider the full cost of landfilling to Metro government and business (approximately \$25 million annually), yet the "Solid Waste Plan" did not analyze costs of composting and diverting portions of the waste stream. This "Solid Waste Plan" is a serious injury to public discourse and decision making.

The conduct of the Regional Solid Waste Board is puzzling. Tax dollars were spent on two engineers who failed to develop credible numbers or to admit that the available numbers were false. It is not clear why the Metropolitan Government or the cities in Davidson County would want such a distorted plan. This Plan locks Davidson County into years of a high rate of expensive and environmentally destructive landfilling. .

We believe this Board has participated in and perpetuated bad public policy. You have tolerated use of palpably false numbers to make excessive claims for waste diversion. You have hurt the poor and minority who are hurt by landfills and failure to use the raw material in solid waste as a raw material in business to create jobs.

We ask, respectfully, for the Board to re-consider this Plan.

Thank you

Bruce Wood
President

R. C. Bartlett
Vice President

cc: Department of Law
Tennessee Department of Environment and Conservation
Mayors of Cities in Davidson County
Metro Public Works
Tennessee Conference NAACP and Nashville Branch of the NAACP