

BEFORE THE METRO COUNCIL

FOR THE PURPOSE OF AMENDING)
THE REGIONAL SOLID WASTE)
MANAGEMENT PLAN)

ORDINANCE NO. 97-700
Introduced by Mike Burton,
Executive Officer

WHEREAS, The Regional Solid Waste Management Plan (Plan), adopted by the Council as a functional plan via Ordinance No. 95-624, describes a process for the Plan's annual review and periodic revision; and

WHEREAS, In keeping with the review and revision process, staff, local government representatives, and other interested parties have proposed amendments to the Plan; and

WHEREAS, The Regional Solid Waste Advisory Committee (SWAC) appointed a task force to review the proposed amendments, to involve the public in that process, and to make recommendations to SWAC, the Executive Officer, and the Council; and

WHEREAS, SWAC has recommended Council adoption of the amendments described in Exhibit A to this ordinance; and

WHEREAS, the Executive Officer has recommended Council adoption of the amendments described in Exhibit A to this ordinance; and

WHEREAS, The amendments are consistent with the overall goal of the Regional Solid Waste Management Plan: To continue to develop and implement a Solid Waste Management Plan that achieves a solid waste system that is regionally balanced, environmentally sound, cost-effective, technologically feasible and acceptable to the public.

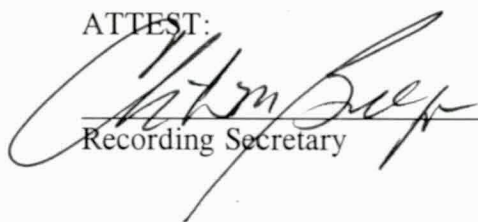
THE METRO COUNCIL ORDAINS AS FOLLOWS:

1. The amendments described in Exhibit A to this ordinance be adopted into the Regional Solid Waste Management Plan.

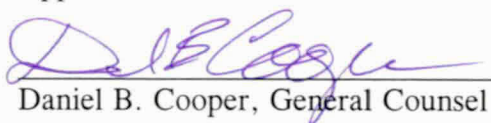
ADOPTED by the Metro Council this 7th day of August, 1997.



Jon Kvistad, Presiding Officer

ATTEST:


Recording Secretary

Approved as to Form


Daniel B. Cooper, General Counsel

Exhibit A to Ordinance No. 97-700

**Amendments to the
Regional Solid Waste Management Plan**

Note: New language is shown as underlined. Deleted language is shown as crossed out.

Amendment 1.A - Review and Approval of Alternative Practices. Chapter 6, "Phase II, Implementation," pages 6-3 and 6-4, are amended as follows:

"Phase II. Implementation Program

The purpose of the implementation program is to make recommended practices happen. The implementation process, however, will allow the development of alternative practices where required by local conditions. As explained in Chapter 7 of the RSWMP, any local government proposing an alternative practice is required to demonstrate that the alternative will perform at the same level as the recommended practice. The director of Metro's Regional Environmental Management Department will review and approve alternatives to recommended practices. This review will occur as part of the Metro/local government annual work plan cycle described below and in Appendix F of this RSWMP. Metro will consider various ways to provide financial support, when necessary to achieve RSWMP goals.

Implementation will require the following types of coordination efforts:

- Metro/Local Government Annual Work Plans - Annual Work Plans are the means by which Metro and local governments plan for the programs, projects and activities to implement the waste reduction elements of the Regional Solid Waste Management Plan for each fiscal year (July 1 - June 30). Metro will continue to coordinate annual planning cycles. Annual Wwork Pplans ensure that planning is conducted with a regional, as well as local, perspective, provide for shared resources and eliminate duplication. Local governments and Metro will cooperatively develop their work plans to determine which recommended solid waste practices or alternative practices will be implemented and/or continued during the next year. Metro's Annual Wwork Pplan will provide technical assistance and support to aid local governments in implementation of recommended solid waste practices or alternative practices. Metro has provided grant funds to local governments to help carry out work plans since 1990. When determining future funding, consideration should be given to local government efforts to maintain existing programs and implement new recommended practices.

Annual Wwork Pplans will be developed in two phases: 1) the Annual Work Plan phase when Metro and local governments, using the RSWMP as a guide, determine the general practices and activities that will be implemented in the upcoming fiscal year; and 2) the implementation phase when Metro and local governments develop the specific programs, projects and activities that will be implemented in the upcoming fiscal year. The planning process and schedule is illustrated in Appendix F of this Plan.

Both the Annual Work Plan and implementation documents will be reviewed by Metro's director of Regional Environmental Management. If a work plan includes alternative practices, the director will confirm that the local government proposing an alternative has demonstrated that the alternative will perform at the same level as the recommended practice. Proposed Annual Work Plans will be reviewed by the SWAC for the purpose of recommending whether they ~~work plan~~ should be approved by the Metro Executive Officer and Council. Annual ~~W~~work ~~P~~lans will then be presented to the Metro Executive Officer and Council for final approval. Plan implementation proposals will be approved by the REM Director. (See Appendix C, Year ~~Eight Six~~ Metro and Local Government Waste Reduction Plans, for an example of an approved Annual Work Plan.)

Alternative practices that are developed at the option of local governments must be submitted to the Metro REM Director by local governments at the beginning of the phase when implementation plans are being developed, as described in Appendix F. However, local governments considering a major departure from one or more recommended practices are encouraged to discuss proposals with the REM Director early in the Annual Work Plan development phase. The REM Director may seek the advice of the regional Solid Waste Advisory Committee regarding proposed alternatives. Approved alternative practices will be incorporated into the plan implementation document.

- Regional Work Groups - Work groups involving Metro, local governments, DEQ and the private sector will continue to study regional problems and recommended program implementation strategies. These work groups will play an important role to implement the new RSWMP. They may also assist to evaluate programs and, if necessary, recommend revisions to the Plan. Table 6.2 shows examples of work groups that met during 1995 to address regional solid waste issues. There are other ad hoc groups not included in this table. New groups form and existing groups disband as issues arise and are resolved. Metro will review the general activities of work groups annually to determine which should disband or whether new groups should be formed.
- Local Government Implementation Efforts - Once annual work plans are developed, local government staff will work with elected officials, citizen advisory groups and waste haulers to manage collection franchises and set service rates to achieve annual work plan goals and objectives.
- Metro Implementation Efforts - Metro will conduct demonstration projects, special studies and other research designed to remove barriers to implementing specific recommended or alternative practices.
- Private Sector Efforts - The private sector will continue to develop and expand recycling and recovery services including drop-off and buy-back centers, material recovery facilities and collection services. Metro efforts will also include continued development of markets for recovered materials and support of firms and industries that use recovered materials in their manufactured products.

Metro is responsible for coordinating implementation efforts and ensuring that all such efforts:

- Maintain consistency with RSWMP goals, objectives, recommended practices and the State of Oregon Integrated Resource and Solid Waste Management Plan.”

Amendment 1.B - Relationship of Alternative Practices to Annual Waste Reduction Work Plans.

Amendment 1.B is added to and made a part of the RSWMP as Appendix F, as follows:

Appendix F, Pg. 1

**Annual Work Plan - Development and Approval Process
Alternative Practices - Application, Review and Approval Process**

Timeline	Annual Work Plan Process	Alternative Practice Process
ANNUAL WORK PLAN PHASE		
The Annual Work Plan phase is the time when Metro and local governments, using the Regional Solid Waste Management Plan as a guide, determine the general types of activities that will be implemented in the upcoming fiscal year (July 1 through June 30).		
Oct. 1	Draft developed by Metro and local govt. staff for the upcoming fiscal year period	Local governments are encouraged to share plans about alternative practices with Metro as early in the planning process as possible, especially if the proposed alternative is a major departure from one or more recommended practices.
Oct. 15 to Dec. 15	Regional public involvement Public Comment and Metro SWAC reviews (3 sessions) RECom Work session RECom public hearing	
Dec. 15 to Jan. 1	Council approval process Metro Council consideration and adoption	
ANNUAL IMPLEMENTATION PLAN PHASE		
The implementation planning phase is the time when Metro and each local government develop specific programs, projects and activities for the upcoming fiscal year (July 1 through June 30). This process is timed to coincide with government budget schedules.		
Jan. 1 to May 1	Details developed by Metro and local government staff that are consistent with the general Annual Work Plan framework.	Alternative practices developed by local governments
Jan. 1 to May 1	Local and Regional Public Involvement Local SWAC and other public involvement Metro budget hearings Local government budget hearings, Other	Local governments work with local solid waste advisory committees to develop implementation details, including alternative practices.
May 1		Deadline - Alternate Practice Concept Submitted by local government to the REM Director.
May 1 - 31		Alternative Practice Concept Considered and Approved by REM Director. The Director may seek the advice of the regional Solid Waste Advisory Committee regarding the alternative practice during this time. Alternative Practices made available for public comment. **
June 1	Implementation Plans Due to Metro from local governments Public Comment on Implementation Plans *	Alternative Practice Details Due to Metro from local governments as part of the detailed annual work plan.
PLAN IMPLEMENTATION		
July 1	Start of Fiscal Year - Implementation begins	Implementation begins
Nov. 30	Intergovernmental agreements for grant funding approved and funds distributed to local governments	
PROGRESS REPORTING		
Aug. 1	Local govt. progress reports due to Metro for previous fiscal year period	Reports will include information about how alternative practices are performing
Nov. 30	Metro publishes annual "State of the Regional Solid Waste Management Plan" status report for the previous fiscal year period	Metro's report will include information about how alternative practices are performing

RECom - Metro Council Subcommittee, the Regional Environmental Management Committee
SWAC - Solid Waste Advisory Committee

* Interested persons will be notified that implementation plans are available for comment before final approval. See the next page for a description of that process.

** Interested persons will be notified that Alternative Practices are available for comment before final approval.

Amendment 1:B - The following words are added to the RSWMP:

RSWMP Appendix F, Pg. 2
Annual Work Plan - Development and Approval Process
Public Input Process for Metro and Local Government Implementation Plans

The following steps will determine the development and approval of Local Government Waste Reduction Implementation Plans.

1. Annual Waste Reduction Implementation plans are received by Metro from local governments on July 15, 1997 (due date will change to June 1 in subsequent years).
2. Metro staff review of plans submitted and notice to interested parties that plans may be reviewed and comments submitted (2 week time-frame).
3. Metro staff will compile both Metro comments and any public comments received.
4. Metro and local government staff will meet to review all comments submitted.
5. Metro and local governments will decide if any comments received warrant changes to the plans.
6. Metro will approve local government plans, as modified through steps 1) through 5) above, within two weeks of meeting with the local governments.

Analysis and consideration of public comments on local government implementation plans received by Metro is an administrative process. Local implementation plans will not be subject to Metro Council, local Council or Commission approval. Public comments are advisory only and may not result in changes to the local government annual implementation plans.

RSWMP Appendix F, Pg. 3

Alternative Practices Application, Review & Approval Process

Background

An "alternative practice" is a solid waste management program or service that is proposed by a local government as an alternative to one or more of the recommended practices stated in the Regional Solid Waste Management Plan (RSWMP). The purpose of this appendix is to provide clarification about the intent of alternative practices and to describe a process by which they will be reviewed and approved.

Intent of Alternative Practices

- They should focus on the strategy underlying the recommended practices
- Perform at same level or better than the recommended practice it is intended to replace
- Allow for local flexibility in programs and services
- Remove barriers to better, innovative approaches
- Be approved using a simple, administrative process

At what point does an approach become an "alternative"?

- If the local practice is a departure from the concept described in the RSWMP
- If the local practice represents a change in the solid waste management hierarchy (e.g., a move from source-separation and recycling to recovery)
- If the local practice diverts substantially from the annual work plan "line item" framework elements

Process for application and review of an Alternative Practice

- Local governments requesting an alternative practice will submit, for the REM Director's approval, a proposal that demonstrates how the alternative will perform at the same level as the recommended practice.
- If the proposed alternative is a major departure from the recommended practice, the local government is encouraged to submit its proposal to the REM Director as early in the annual plan development cycle as possible.
- To demonstrate the same level of performance, the proposal for an alternative practice should address, as appropriate, the following criteria:
 - . Estimated participation levels
 - . Estimated amount of waste that will be prevented, recycled, recovered, or disposed
 - . Consistency with the waste reduction hierarchy and source separation priority
 - . Economic and technical feasibility
 - . Estimated impact on other waste reduction activities
- The REM Director will consider and may approve the proposal based on the criteria listed above.

~~Amendment 2 -- Targets for Business Waste Prevention Programs~~

Amendment 2 is added to and made a part of the RSWMP as Appendix G, as follows:

RSWMP Appendix G, Pg. 1

Types of Businesses Targeted for Waste Prevention Programs

Note: The purpose of Appendix G is to clarify the types of businesses and materials targeted for regional waste prevention programs that are described in the Regional Solid Waste Management Plan.

Office Related Businesses	Banking and financial institutions, insurance, real estate, title companies, legal service, engineering, architects, accounting, advertising, public relations, personnel services, personnel services, management.
Education	Elementary and secondary schools, colleges, universities, professional schools, junior colleges, libraries, vocational schools, and other educational services.
Dry Goods Retail	All types of retail except food stores. Examples include stores that sell lumber and building supplies, lawn and garden supplies, appliances, furniture, household goods, and clothing.
Wholesale and Warehousing	Businesses that wholesale and/or warehouse various goods including furniture and home furnishings, lumber and construction materials, professional and commercial equipment, durable goods, paper products, clothing, and groceries and related products. This category also includes public warehousing and storage.
Medical and Dental	Hospitals, medical and dental clinics, medical and dental schools and universities.
Hotels, Institutional and Other Services	Hotels, motels, auto leasing and rental, museums and galleries, professional organizations, social services, and health services.

These businesses have been targeted because they currently produce large quantities of preventable or recoverable wastes of the types listed below:

Paper Materials and Packaging:	Plastic Packaging:	Wood Packaging:
High grade office paper	Shrink and stretch wrap	Pallets
Mixed grades of office paper	Plastic bags	Crates
Newspaper	Bubble pack	Dimensional lumber
Corrugated cardboard, kraft paper		
Other paper packaging		

Pilot projects have demonstrated that these businesses can achieve higher levels of waste prevention (and significant reductions in waste disposed) by changing purchasing and other management practices. Periodic assessments will be conducted to track and measure progress. The types of businesses targeted for waste prevention programs could change over time. See the following pages for a complete list of all the types of businesses, by SIC code, within each general category.

The regional goal is to reach 80% of targeted businesses by the year 2000. Each local government will implement a strategy to achieve waste prevention from the targeted types of businesses located within its jurisdiction. Upon request, Metro will assist local governments to identify the types, numbers and sizes of businesses within local jurisdictions.

RSWMP Appendix G, Pg. 2

Types of Businesses Targeted for Waste Prevention Programs - Listed by SIC Codes

I. OFFICE RELATED	
Code	Description
601	Central Reserve Depository Institutions
602	Commercial Banks
603	Savings Institutions
606	Credit Unions
609	Functions related to depository banking (trust companies)
611	Federal and Federally Sponsored Credit Agencies
614	Personal Credit Institutions
615	Business Credit Institutions
616	Mortgage Bankers and Brokers
621	Security Brokers, Dealers and Flotation Companies
622	Commodity Contracts Brokers and Dealers
623	Security and Commodity Exchanges
628	Services allied with the Exchange of Securities or Commodities
631	Life Insurance
632	Accident and Health Insurance and Medical Service Plans
633	Fire, Marine, and Casualty Insurance
635	Surety Insurance
636	Title Insurance
637	Pension, Health, and Welfare Funds
639	Insurance Carriers (general)
641	Insurance Agents, Brokers, and Service
651	Real Estate Operators and Lessors (no Developers)
653	Real Estate Agents and Managers
654	Title Abstract Offices
655	Land Subdividers and Developers
671	Holding Offices
672	Investment Offices
673	Trusts
679	Miscellaneous Investing
731	Advertising
732	Consumer Credit Reporting, Mercantile Reporting, Adjustment and Collection Agencies
733	Mailing, Reproduction, Commercial Art, Photography and Stenographic Services
736	Personnel Supply Services
737	Computer Programming, Data Processing, and other Computer Related Services
801	Offices and Clinics of Doctors of Medicine
802	Offices and Clinics of Dentists
803	Offices and Doctors of Osteopathy
804	Offices and Clinics of Other Health Practitioners
807	Medical and Dental Laboratories
811	Legal Services
871	Engineering, Architectural, and Surveying Services
872	Accounting, Auditing, and Bookkeeping Services
874	Management and Public Relations Services

RSWMP Appendix G, Pg. 3

Types of Businesses Targeted for Waste Prevention Programs - Listed by SIC Codes

II. EDUCATION	
Code	Description
821	Elementary and Secondary Schools
822	Colleges, Universities, Professional Schools and Junior Colleges
823	Libraries
824	Vocational Schools
829	Other Schools and Educational Services

III. DRY GOODS RETAIL	
Code	Description
521	Lumber and Other Building Materials
525	Hardware Stores
526	Retail Nurseries, Lawn and Garden Supply Stores
531	Department Stores
533	Variety Stores
539	Miscellaneous General Merchandise Stores
561	Men's and Boy's Clothing and Accessory Stores
562	Women's Clothing Stores
563	Women's Accessory and Specialty Stores
564	Children's and Infants' Wear Stores
565	Family Clothing Stores
566	Shoe Stores
569	Miscellaneous Apparel and Accessory Stores
571	Home Furniture and Furnishing Stores
572	Household Appliance Stores
573	Radio, Television, Consumer Electronics, and Music Stores
591	Drug Stores and Proprietary Stores
593	Used Merchandise Stores
594	Miscellaneous Shopping Goods Stores
599	Retail Stores (not otherwise classified)

IV. WHOLESALE/WAREHOUSING	
Code	Description
422	Public Warehousing and Storage
502	Furniture and Home Furnishings Wholesale
503	Lumber and Other Construction Materials Wholesale
504	Professional and Commercial Equipment and Supplies Wholesale
509	Miscellaneous Durable Goods Wholesale
511	Paper and Paper Products Wholesale
513	Apparel, Piece Goods, and Notions Wholesale
514	Groceries and Related Products Wholesale
519	Miscellaneous Nondurable Goods Wholesale

RSWMP Appendix G, Pg. 4

Types of Businesses Targeted for Waste Prevention Programs - Listed by SIC Codes

V. HOTEL, INSTITUTIONAL and OTHER SERVICES	
Code	Description
701	Hotels and Motels
702	Rooming and Boarding Houses
704	Organization Hotels and Lodging Houses on Membership Basis
751	Automotive Rental and Leasing
753	Automotive Repair Shops
805	Nursing and Personal Care Facilities
806	Hospitals
809	Miscellaneous Health and Allied Services
832	Individual and Family Social Services
833	Job Training and Vocational Rehabilitation Services
836	Residential Care
841	Museums and Galleries
861	Business Associations
862	Professional Membership Organizations
863	Labor Unions and Similar Labor Organizations
864	Civic, Social, and Fraternal Organizations
865	Political Organizations
866	Religious Organizations

Amendment 3.A - Expansion of Source-Separated Recycling for Businesses

Chapter 7, page 7-15, "Key Elements of the Recommended Practice," item a), is amended as follows: "a) Collection of paper (newspaper, corrugated cardboard, high grade office paper, and scrap paper) and containers (glass, tin, aluminum, PET and HDPE) from businesses. For businesses that do not dispose of significant quantities of paper and containers, the most prevalently disposed recyclable materials (e.g., scrap metals, wood, yard debris or plastic film) will be collected."

Amendment 3.B - Expansion of Source-Separated Recycling for Businesses

Table 2A, page 7-36, Recommended Practice #2, key element a), is amended as follows: "a) Collection of paper (newspaper, corrugated cardboard, high grade office paper, and scrap paper) and containers (glass, tin, aluminum, PET and HDPE) from businesses. For businesses that do not dispose of significant quantities of paper and containers, the most prevalently disposed recyclable materials (e.g., scrap metals, wood, yard debris or plastic film) will be collected."

Amendment 4.A - Recycling Services for Building Industries

Chapter 7, page 7-20, "Key Elements of the Recommended Practice," item a), is amended as follows: "Local governments assure the availability of on-site services for two or more materials and ensure that generators requesting hauling services for construction and demolition sites are offered these services."

Amendment 4.B - Recycling Services for Building Industries

Table 3, page 7-38, Recommended Practice 2, key element a), is amended as follows:
“Local governments assure the availability of on-site services for two or more materials and ensure that generators requesting hauling services for construction and demolition sites are offered these services.”

Amendment 5.A - Metro In-House Recycling for Construction-Related Projects

Chapter 7, page 7-20, “Key Elements of the Recommended Practice,” item d), is added to and made part of the RSWMP as follows: “Consistent with the provisions of Metro Executive Order No. 47 relating to in-house waste reduction practices, require the recycling of construction and demolition debris for Metro in-house construction, demolition and remodel projects.”

Amendment 5.B - Metro In-House Recycling for Construction-Related Projects

Table 3, page 7-38, Recommended Practice #2, key element d) is added to and made a part of the RSWMP as follows: “Consistent with the provisions of Metro Executive Order No. 47 relating to in-house waste reduction practices, require the recycling of construction and demolition debris for Metro in-house construction, demolition and remodel projects.”

Amendment 6 - Assessment of Residential Scrap Paper Programs

Table 1A, page 7-34, Recommended Practice #3, key element a), key dates and issue 2, is amended as follows: “Assess scrap paper efforts by 12/98.”

Amendment 7 - Residential Curbside Recycling Promotion

Table 1A, page 7-34, Recommended Practice #3, key element d), “Responsible,” is amended as follows: “LG, M, H.”

Amendment 8 - Removed from consideration

Amendment 9 - Business Recycling Recognition Program

Table 2A, page 7-36, Recommended Practice #2, key element d), “Responsible,” is amended as follows: “LG, PS, M.”

Amendment 10 - Removed from consideration

Amendment 11 - Removed from consideration

Amendment 12 - Post-collection Recovery Fee Waivers

Table 2B, page 7-37, Recommended Practice #4, key element c), key date and issue 1, is deleted from the RSWMP as follows: “~~Coordinate with Metro rate revision process; New rate structure by 7/96.~~”

Amendment 13 - Post-collection Recovery and Vertical Integration

Table 2B, page 7-37, Recommended Practice #4, key element e), key date and issue 1 is deleted from the RSWMP as follows: “~~Coordinate with Metro rate revision process; New rate structure by 7/96.~~”

Amendment 14.A - Salvaged Building Materials

Chapter 7, pages 7-19 and 7-21; and Table 3, page 7-38, Recommended Practice #3, is amended as follows: "Develop markets to support reuse and recycling rather than energy recovery."

Amendment 14.B - Salvaged Building Materials

Table 3, page 7-38, Recommended Practice #3, key elements a) and b), key dates and issues are amended as follows: "~~Reduction in wood recovery for energy; 1) 25% reduction by 1/97; 2) 50% reduction by 7/00;~~ Monitor progress of the increase in salvaged building materials."

Amendment 15.A - Yard Debris Facilities and Regulation

Chapter 7, page 7-23, Recommended Practice #1, key element c), is amended as follows: "Local Governments require use of Metro and Oregon DEQ licensed authorized facilities by their franchised curbside yard debris collectors."

Amendment 15.B - Yard Debris Facilities and Regulation

Table 4, page 7-39, Recommended Practice #1, key element c), is amended as follows: "Local Governments require use of Metro and Oregon DEQ authorized-facilities by their franchised curbside yard debris collectors."

Amendment 15.C - Yard Debris Facilities and Regulation

Table 4, page 7-39, Recommended Practice #1, key element c), key date and issue 2, is amended as follows: "Existing facilities by 1/98."

Amendment 16 - Removed from consideration

Amendment 17 - Organic Waste Regulatory System

Table 4, page 39, Recommended Practice #2, key element a), key date and issue 1, is amended as follows: "By 12/97."

Amendment 18 - Removed from consideration

Amendment 19 - Metro Facility Capital Improvement Planning

Table 5, page 7-40, Recommended Practice #1, key element a), key date and issue 2, is amended as follows: "New Metro South and Central operations contracts by 10/97."

Amendment 20 - Metro Transfer Station Assessment

Table 5, page 7-40, Recommended Practice #1, key element c), "Responsible," is amended as follows: "M, LG, PS, H."

Amendment 21 - Maintain Disposal Options and Alternatives

Table 5, page 7-40, Recommended Practice #3, key element b), "Responsible," is amended as follows: "M, LG."

Amendment 22.A - Cross reference to technical appendix and performance information

Chapter 7, page 7-7, Recommended Practice #2, title, shall be amended as follows: “2. Expand Home Composting (Projected tonnage reductions are shown in Tables 9.2a and 9.2b. Additional technical specifications and performance information is available in Appendix E.)”

Amendment 22.B - Cross reference to technical appendix and performance information

Chapter 7, page 7-8, Recommended Practice #3, title, shall be amended as follows: “3. Expand and Increase Participation in Existing Residential Curbside Programs (Projected tonnage reductions are shown in Tables 9.2a and 9.2b. Additional technical specifications and performance information is available in Appendix E.)”

Amendment 22.C - Cross reference to technical appendix and performance information

Chapter 7, page 7-11, Recommended Practice #5, title, shall be amended as follows: “5. Curbside Collection and Processing of Residential Food Wastes (Projected tonnage reductions are shown in Tables 9.2a and 9.2b. Additional technical specifications and performance information is available in Appendix E.)”

Amendment 22.D - Cross reference to technical appendix and performance information

Chapter 7, page 7-13, Recommended Practice #1, title, shall be amended as follows: “1. Waste Prevention and Recycling Education, Information and Market Development (Projected tonnage reductions are shown in Tables 9.2a and 9.2b. Additional technical specifications and performance information is available in Appendix E.)”

Amendment 22.E - Cross reference to technical appendix and performance information

Chapter 7, page 7-14, Recommended Practice #2, title, shall be amended as follows: “2. Expand Source-Separated (Pre-Collection) Recycling (Projected tonnage reductions are shown in Tables 9.2a and 9.2b. Additional technical specifications and performance information is available in Appendix E.)”

Amendment 22.F - Cross reference to technical appendix and performance information

Chapter 7, page 7-16, Recommended Practice #3, title, shall be amended as follows: “3. Collection and Off-Site Recovery of Source-Separated Food and Non-Recyclable Paper (Projected tonnage reductions are shown in Tables 9.2a and 9.2b. Additional technical specifications and performance information is available in Appendix E.)”

Amendment 22.G - Cross reference to technical appendix and performance information

Chapter 7, page 7-17, Recommended Practice #4, title, shall be amended as follows: “4. Regional Processing Facilities for Mixed Dry Waste (Projected tonnage reductions are shown in Tables 9.2a and 9.2b. Additional technical specifications and performance information is available in Appendix E.)”

Amendment 22.H - Cross reference to technical appendix and performance information

Chapter 7, page 7-20, Recommended Practice #2, title, shall be amended as follows: “2. On-Site Source-Separation of Recyclables at Construction and Demolition Sites (Projected tonnage reductions are shown in Tables 9.2a and 9.2b. Additional technical specifications and performance information is available in Appendix E.)”

STAFF REPORT

IN CONSIDERATION OF ORDINANCE NO. 97-700, FOR THE PURPOSE OF AMENDING THE REGIONAL SOLID WASTE MANAGEMENT PLAN (RSWMP)

DATE: July 1, 1997

Presented by: Bruce Warner

Action Requested

Purpose of the Ordinance

The Council is requested to adopt Ordinance No. 97-700 which would approve amendments to the Regional Solid Waste Management Plan (RSWMP) developed during the annual review of the RSWMP. The amendments make the changes necessary to ensure the RSWMP remains a current and relevant policy document. The amendments are summarized later in this staff report.

Background

RSWMP requirements for Plan amendments. The amendments proposed under Ordinance No. 97-700 have been brought forward, reviewed and considered according to the public process prescribed in Chapter 6 of the RSWMP. The amendments are consistent with the overall goal of the RSWMP which is to continue to develop and implement a Solid Waste Management Plan that achieves a solid waste system that is regionally balanced, environmentally sound, cost-effective, technologically feasible and acceptable to the public.

Regional Task Force and SWAC consideration of proposed amendments. In January 1997, the Regional Solid Waste Advisory Committee (SWAC) appointed a task force to review proposed amendments. The task force included representatives from the solid waste hauling, processing and recycling industries, recycling advocates, a business representative, and local regional and state government interests. On May 21, SWAC voted to accept the Task Force's recommendations regarding the amendments which are now included in Ordinance No. 97-700.

SWAC approved additional RSWMP amendments on April 16, 1997, relating to solid waste facilities. Those amendments are not included in Ordinance No. 97-700. Implementation of those amendments is still under consideration by SWAC. Those amendments will be forwarded for Council consideration once SWAC completes its discussion.

Public Involvement. In addition to SWAC and Task Force involvement, a mailing went out to over 200 interested parties -- waste hauling associations, solid waste facility operators, elected officials, city and county administrators and planning managers, environmental groups, neighborhood associations, and others -- advising them of the proposed amendments, and inviting them to comment. A number of comments were received as a result of that effort. See Attachment 3 to this staff report for a summary of the public involvement process, the

comments received, and an explanation of how comments resulted in language changes.

As a result of the public involvement phase, SWAC voted on May 21 to remove Amendments 8, 10, 11, 16, and 18 from further consideration. Amendment 8 had proposed a change in the lead role for planning residential food waste collection -- from local governments to Metro. Amendments 10, 11, 16, and 18 had proposed date extensions for the implementation of commercial and residential collection of food waste. The Task Force recommended that reasonable implementation dates be established by April 1998 as a part of the long-range organic waste management system planning efforts currently underway.

DEQ Approval: The public involvement process also includes Oregon Department of Environmental Quality (DEQ) review and approval of RSWMP amendments once they are approved by the Metro Council. See Attachment 4 for a letter from the DEQ advising Metro of the specific criteria by which DEQ will review and approve RSWMP amendments. DEQ staff have given a preliminary indication that the amendments as proposed meet those criteria.

Policy Impacts

No policy impacts are expected from the proposed amendments.

Financial Impacts

As noted in this staff report (see "Summary of the Proposed Amendments" section below), Amendment 5, requiring recycling for Metro in-house construction projects, is consistent with City of Portland ordinance (passed January 1996) that mandates recycling for construction and demolition projects in the City of Portland and with Metro Executive Order No. 47. Construction costs for projects outside the City of Portland may be affected by adoption of the amendment. No financial impacts are expected from the other proposed amendments.

Summary of the Proposed Amendments

- ◆ **Amendments 1.A and 1.B - Provide clarification for the process by which Alternative Practices are reviewed and approved, and the relationship of Alternative Practices to the Annual Waste Reduction Work Plan Process.** Amendment 1.A would change language in RSWMP Chapter 6. Amendment 1.B would add a new Appendix F to the RSWMP. The amendments were requested by Metro and local government staff. Chapter 6 as currently written has caused some readers to erroneously conclude that the approval of an Alternative Practice is a legislative, rather than administrative, process. Also, the RSWMP's description of the process (pages 6-3 and 6-4) by which Metro/Local Government Annual Waste Reduction Work Plans are developed, reviewed and approved, no does not reflect that the planning process has two distinct phases. The proposed amendments: 1) affirm that the Regional Environmental Management (REM) Director is responsible for review and approval of alternative practices; 2) affirm that the REM Director may seek the advice of the Regional Solid Waste Advisory Committee regarding the

consideration and approval of alternatives; 3) clarify the relationship of the alternative practices approval process to the Annual Waste Reduction Work Planning process;

4) provide an accurate description of the two-phased annual work planning process; and

5) affirm that the Metro Council approves annual work plans during the initial, general planning phase.

- ◆ **Amendment 2 - Provides clarification of targets for business waste prevention programs** by adding a new Appendix G. The RSWMP does not currently provide a comprehensive description of the types of businesses that should be targeted for waste prevention efforts. Local government representatives have requested clarification.

- ◆ **Amendments 3.A and 3.B - Expand the Recommended Practice relating to source-separated recycling for businesses, key element a) of Recommended Practice #2, to read:** “Collection of paper (newspaper, corrugated cardboard, high grade office paper, and scrap paper) and containers (glass, tin, aluminum, PET and HDPE) from businesses. For businesses that do not dispose of significant quantities of paper and containers, the most prevalently disposed recyclable materials (e.g., scrap metals, wood, yard debris or plastic film) will be collected.” The RSWMP currently provides for the collection of paper and containers from all businesses. The proposed amendment expands the Recommended Practice to include collection of other materials from those businesses that don’t have significant quantities of paper and/or containers.

Key element a) of Recommended Practice #2 is described in two different places in the RSWMP. Amendment 3.A would change language in the Chapter 7 text. Amendment 3.B would change language in the Chapter 7 implementation table.

- ◆ **Amendments 4.A and 4.B - Provide clarification regarding recycling services for building industries** by amendment key element a) of Recommended Practice #2, to read: “Local governments assure the availability of on-site services for two or more materials and ensure that generators requesting hauling services for construction and demolition sites are offered these services.” This amendment provides that generators requesting hauling services for construction and demolition sites are offered those services. The amendment was requested by local governments to define the term “assure availability.”

Key element a) of this Recommended Practice is described in two different places in the RSWMP. Amendment 4.A would change language in the Chapter 7 text. Amendment 4.B would change language in the Chapter 7 implementation table.

- ◆ **Amendments 5.A and 5.B - Provides for in-house recycling for Metro construction-related projects** by adding a new key element d) to Recommended Practice #2, to read: “Consistent with the provisions of Metro Executive Order No. 47 relating to in-house waste reduction practices, require the recycling of construction and demolition debris for Metro in-house construction, demolition and remodel projects.” This amendment was requested by Metro staff to ensure Metro’s commitment to construction and demolition recycling for its own facilities and projects, to ensure that provisions of Metro Executive Order No. 47 were carried out, and to be consistent with the provisions of a City of Portland ordinance relating

to recycling requirements for businesses.

Key element d) of Recommended Practice #2 is described in two different places in the RSWMP. Amendment 5.A would add language in the Chapter 7 text. Amendment 5.B would add language in the Chapter 7 implementation table.

- ◆ **Amendment 6 - Assessment of Residential Scrap Paper Programs.** Changes the date for assessing curbside scrap paper collection from 1/97 to 12/98 on Table 1A, page 7-34, Recommended Practice #3, key element e). This change was requested by Metro and local government staff because the method for assessing the program will be through the region-wide waste characterization study that will be conducted during calendar year 1998.
- ◆ **Amendment 7 - Residential Curbside Recycling Promotion.** Provides clarification that local governments, rather than Metro, will take the lead to target neighborhoods for promotions to increase participation in curbside recycling programs. Changes Table 1A, page 7-34, Recommended Practice #3, key element d). This change corrects a typographical error.
- ◆ **Amendment 8 - Removed from consideration.** This amendment was removed from further consideration as a result of public involvement efforts and SWAC consensus. See Attachment 3 of this staff report for further explanation.
- ◆ **Amendment 9 - Business Recycling Recognition Program.** Provides clarification that local governments, rather than Metro, take the lead for business recycling recognition programs. Changes Table 2A, page 7-36, Recommended Practice #2, key element d). This change corrects a typographical error.
- ◆ **Amendments 10 and 11 - Removed from consideration.** These amendments were removed from further consideration as a result of public involvement efforts and SWAC consensus. See Attachment 3 of this staff report for further explanation.
- ◆ **Amendment 12 - Post-collection Recovery Fee Waivers.** This is a key date change to Table 2B, page 7-37, Recommended Practice #4, key element c). The amendment deletes the reference that the consideration of fee waivers on the material recovered at mixed dry waste processing facilities should coincide with the Metro FY 1995-96 rate revision process. The fee waiver issue will be addressed as part of the Metro Regulatory Code revision project which is currently in progress. No changes were made to Metro's rate structure as a result of the FY 1995-96 rate review process.
- ◆ **Amendment 13 - Post-collection Recovery and Vertical Integration.** This is a date change to Table 2B, page 7-37, Recommended Practice #4, key element e). The amendment deletes reference that consideration of vertical integration policies should coincide with the Metro FY 1995-96 rate revision process. The vertical integration policy will be addressed as part of the Metro Regulatory Code revision project which is currently in progress.

Amendments 14.A and 14.B - Salvaged Building Materials: Amendment 14.A would change Building Industries Recommended Practice #3 to read: "Develop markets to support reuse and recycling rather than energy recovery." The change would be made in three different places in the RSWMP.

Amendment 14.B would change the description of how the results of salvage efforts would be measured. It would change the measurement method described in Table 3, page 7-38, Recommended Practice #3, key elements a) and b), from a percentage of wood recovered for energy to a percentage of increase in salvaged materials. This change was recommended by Metro staff because the amount of materials salvaged is a more comprehensive and accurate measure of progress and is easier to track.

- ◆ **Amendments 15.A, 15.B and 15.C - Yard Debris Facilities and Regulation:** Amendment 15.A would change the language in the Chapter 7 text that describes Recommended Practice #1, key element c): "Local Governments require use of Metro and Oregon DEQ authorized facilities by their franchised curbside yard debris collectors." Amendment 15.B would change the language in Chapter 7, Table 4 to read the same as a) above.

Amendment 15.C would change Chapter 7, Table 4, page 39, to adjust the implementation date by which local governments require franchised curbside and yard debris collectors to use Metro authorized facilities - from 1/97 to 1/98. The licensing of Metro-area yard debris composting facilities is currently in progress and will be completed by 6/97. Metro and DEQ staff are currently developing state-wise standards which will be completed in late 1997. Metro and DEQ will work with local governments to implement the recommended practice.

- ◆ **Amendment 16 - Removed from consideration.** This amendment was removed from further consideration as a result of public involvement efforts and SWAC consensus. See Attachment 3 of this staff report for further explanation.
- ◆ **Amendment 17 - Organic Waste Regulatory System.** This is a date change to Table 4, page 39, Recommended Practice #2, key element a). The amendment adjusts the implementation date for developing a regulatory system for the processors of food and other organic waste - from 7/97 to 12/97. This work will begin once the Metro Regulatory Code is revised.
- ◆ **Amendment 18 - Removed from consideration.** This amendment was removed from further consideration as a result of public involvement efforts and SWAC consensus. See Attachment 3 of this staff report for further explanation.
- ◆ **Amendment 19 - Metro Facility Capital Improvement Planning.** This is a change to Table 5, page 7-40, Recommended Practice #1, key element a). The amendment adjusts the implementation date of the Metro capital improvement plan from 7/96 to 10/97. Adjust key date of new Metro South and Central contracts from 10/96 to 10/97. These date changes were recommended by Metro staff. It became necessary to amend the implementation schedule because of the impacts of flooding at Metro South Station.

- ◆ **Amendment 20 - Metro Transfer Station Assessment.** This amendment changes the lead role for this responsibility as described in Table 5, page 7-40, Recommended Practice #1, key element c). The amendment provides clarification that Metro, rather than local governments, will take the lead role to implement waste handling practices at Metro's transfer stations sufficient to reduce the demand on transfer facilities.
- ◆ **Amendment 21 - Maintain Disposal Options and Alternatives.** This amendment changes the lead role for the responsibility as described in Table 5, page 7-40, Recommended Practice #3, key element b). It provides clarification that Metro, rather than local governments, will take the lead role to maintain the franchised, in-region system of private landfills and processing facilities. The change was requested by Metro staff.
- ◆ **Amendments 22.A through 22.H.** These amendments provide more information to the reader about certain Recommended Practices described in Chapter 7. It adds a reference in several places that the reader can refer to Appendix E for technical specifications of designated Recommended Practices or to Tables 9.2a and 9.2b for information about how the practices are expected to perform.

Executive Offer Recommendation

The Executive Officer recommends adoption of Ordinance No. 97-700.

Attachments to this staff report:

- Attachment 1 Public Involvement Process and Schedule
- Attachment 2 RSWMP Amendment Task Force Membership
- Attachment 3 Summary of Comments Received as a Result of Public Involvement
- Attachment 4 Letter from the DEQ - Criteria for DEQ Approval of Plan Amendments

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Attachment 1

Regional Solid Waste Management Plan - Amendment Process Public Involvement Process and Schedule

Preliminary Process		
Interested Parties	<ul style="list-style-type: none"> . Submittal of proposed Plan amendments to staff by various interested parties . Staff solicited public comment regarding certain Plan amendments as part of the Year 8 Waste Reduction Work Plan public involvement process 	Jan. 1995 through Jan. 1996
REM Director	Release of annual "State of the Plan" report; need for certain Plan amendments reported	Nov. 1995
REM Director	Authorized consideration of certain Plan amendments	Jan. 1996
RECom	Recommended Council approval of the Year 8 Waste Reduction Work Plan; authorized consideration of certain Plan amendments	Jan. 22 (Council approved Year 8 Work Plan on Feb. 6)
SWAC	Established RSWMP Amendment Task Force and defined the group's scope of work	Jan. 15
DEQ	Transmitted a letter to Metro stating the criteria by which DEQ would approve RSWMP amendments	Feb. 10
1st Draft Phase - Process and Timeline		
SWAC Task Force	SWAC Task Force developed recommendations	April 9
Full SWAC	SWAC recommended Metro Executive Officer and Council approval of proposed amendments relating to solid waste facilities	April 16
Council RECom	Review and comment on 1st draft	April 25 - May 12
Public Review	Mailing to interested parties: <ul style="list-style-type: none"> . Letter summarizing proposed amendments . Summary of process and timeline Deadline for public comments on proposals	April 25 May 12
SWAC Task Force	The Task Force considered public comments and developed final recommendations	May 19
Final Draft Phase - Process and Timeline		
Full SWAC	Accepted the Task Force's recommendations; Recommended Council adoption of proposed waste reduction and "housekeeping" amendments as	May 21
Full SWAC	Discussion regarding the possible impacts of the amendments relating to solid waste facilities	June 18
Executive Officer	Executive Officer reviews ordinance; Staff report and ordinance filed with Council	July 2
Full Council	1st reading of the ordinance to adopt amendments (no public hearing or deliberation will occur at this meeting)	July 17 (tentative)
Public Hearing Council RECom	Public hearing on the ordinance to adopt the amendments; RECom forms its recommendation to the Council	July 23 (tentative)
Full Council	2nd reading of the ordinance to adopt the Plan; Consideration of Plan adoption	August 7 (tentative)
DEQ	DEQ approval the amendments adopted by Council	August
	Distribution of amendments to interested parties	September

RSWMP: The Regional Solid Waste Management Plan.

RECom: Regional Environmental Management Committee, a subcommittee of the Metro Council.

SWAC: Regional Solid Waste Advisory Committee; advisory to the Metro Executive Officer and Council.

Meeting times and places: Call the Metro Council Office (797-1540) for information about RECom meeting

Attachment 2

**Regional Task Force
Solid Waste Management Plan Amendments**

Name

Affiliation

TASK FORCE MEMBERS:

Lee Barrett	City of Portland
Susan Ziolko	Clackamas County
Scott Klag	Metro
Jennifer Erickson (Alt.)	
Dave Kunz	DEQ, NW Region
Tom Miller	waste haulers
Mike Misovetz	citizen, business
Jeff Murray	recycling industry
Jeanne Roy	Recycling Advocates
Betty Patton	environmental advocate
Lynne Storz	Washington County

OTHER INTERESTED PARTIES:

The following people received agendas throughout the process. Some of these people attended meetings and offered comments during the process.

Tam Driscoll	East Multnomah County Cities
Kathy Kiwala	Washington County
JoAnn Herrigel	City of Milwaukie
Dave White	ORRA / Tri-County Council
Estle Harlan	Clackamas County Haulers

Attachment 3, pg. 1

**Summary of Comments Received
as a Result of Public Involvement Efforts**

Summary of Comments Received	Task Force's Recommendations to SWAC *
<p>Amendment 1 - Annual Work Planning Process Amend Exhibit C, pg. 1, Proposed Appendix F. Provide opportunities for public comment on the draft Annual Work Plan before the REMCom work session and the public hearing. (J. Roy)</p>	<p>Amend as requested. See Exhibit C, pg. 1 for proposed language change.</p>
<p>Amendment 1 - Annual Work Plan Implementation Amend Exhibit C, Proposed Appendix F. Provide an opportunity for public comment on the local implementation plans before they are approved by Metro. (J. Roy)</p>	<p>Amend as requested. See Exhibit C, pg. 1, for proposed language change. Add an additional page to Exhibit C (pg. 2) to describe how the public process would work.</p>
<p>Amendment 1 - Alternative Practices - Review and Approval Amend Exhibit C, Proposed Appendix F. Include an opportunity for public comment on proposed alternative practices before they are approved by Metro. (J. Roy)</p>	<p>Amend as requested. See Exhibit C, pg. 1, for proposed language change.</p>
<p>Amendment 5 - Metro In-House Recycling / Bldg. Industries Either eliminate the amendment or provide a more specific description of the requirements of Executive Order No. 47. (J. Roy)</p>	<p>Amend as requested: <u>"Ensure the provisions of Metro Executive Order No. 47 relating to waste reduction practices for Metro construction, demolition and remodel projects. Metro will continue to implement waste reduction practices on its in-house construction, demolition, and remodeling projects. The following waste reduction practices shall be considered for each project: reuse, salvage, recycling, use of products with recycled content, and facility designs that provide space for recycling and promote conservation of resources such as energy and water. Specific requirements for projects are currently established in Metro Executive Order No. 47 and shall be updated as necessary due to changes in construction technologies, state statutes or other relevant considerations."</u></p>
<p>Amendment 8 - Residential Food Waste Collection, Lead Role. Do not amend the RSWMP to change lead role from local governments to waste haulers. Local governments should retain the lead role for residential food collection. (J. Roy, Washington County Recycling Cooperative)</p>	<p>We agree. Withdraw the amendment from consideration.</p>
<p>Amendment 10 - Organic Waste Processing Pilot Projects, Date Change. Extend the target dates out further than 1/98. (Wash. Co. Coop.)</p>	<p>Withdraw the amendment from consideration. Reasonable implementation target dates will be established by 4/98 as part of the long-range organic waste management system planning effort (coordinated by B. Metzler and J. Ness). The RSWMP can be amended once those dates are established.</p>
<p>Amendment 11 - Organic Waste Processing Pilot Projects - Date Change. A reasonable target date should be established. (J. Roy)</p>	<p>Withdraw the amendment from consideration. See Amendment 10 for explanation.</p>

* On May 21, SWAC voted to recommend Metro Council approval of the proposed amendments as recommended by the Task Force.

Attachment 3, pg. 2

Summary of Comments Received	Task Force's Recommendations to SWAC *
<p>Amendment 14 - Salvaged Building Materials. Change Recommended Practice #3 to "Develop markets to support reuse and recycling rather than energy recovery." This supports the intent of the practice more closely. Also, it is not obvious how it could be "easier to track" salvaged materials (rather than energy recovery levels), but Metro staff may have more information on that matter. (Wash. Co. Coop.)</p>	<p>Amend the language as requested. Metro staff will develop a plan for measuring the results of region-wide salvage efforts.</p>
<p>Amendment 15 - Yard Debris Facilities and Regulation. Change Recommended Practice #1 to read: "Local Governments require use of Metro or State authorized facilities by their franchised curbside yard debris collectors." (Wash. Co. Coop.)</p>	<p>Amend the language as requested. "Local Governments require use of Metro or Oregon DEQ authorized facilities by their franchised curbside yard debris collectors." Metro and DEQ staff are currently developing state-wide standards which will be completed by late 1997. Metro and DEQ will work with local governments to implement the recommended practice.</p>
<p>Amendment 16 - Yard Debris Facility Siting, Date Change. The target date should be extended further out to make sure local siting codes are consistent with new state land use codes. (Wash. Co. Coop.)</p>	<p>Withdraw the amendment from consideration. See Amendment 10 for an explanation. We agree with the Coop's concerns and recognize the need for coordination among local governments, Metro, and the Oregon LCDC regarding compost facility siting.</p>
<p>Amendment 17 - Organic Waste Regulatory System. Instead of Metro developing its own regulatory and performance standards for organics facilities, Metro should use the DEQ's recently developed standards. It is an excellent piece of work and it seems pointless to duplicate such an effort. If DEQ's standards are used, it could place organics into Metro's code revision in a more timely fashion. (Wash. Co. Coop.)</p>	<p>We agree. Maintain the proposed language. Metro will coordinate with the DEQ to streamline the regulatory system. A precedent already exists per Metro's proposed intergovernmental agreement with the DEQ regarding the oversight of yard debris processing facilities.</p>
<p>Amendment 18 - Organic Facility Siting Standards, Date Change. A reasonable target date should be retained. (J. Roy, Wash. Co. Coop.)</p>	<p>Withdraw the amendment from consideration. See Amendment 10 for response.</p>
<p>Amendment 20, Metro Transfer Station Assessment. It is assumed that this statement refers to "waste handling practices" within the transfer stations and not by haulers. (Wash. Co. Coop.)</p>	<p>That assumption is correct. Maintain the proposed language.</p>

* On May 21, SWAC voted to recommend Metro Council approval of the proposed amendments as recommended by the Task Force.

Attachment 4
Letter from the DEQ
Criteria for Approval of Plan Amendments

February 10, 1997

RECEIVED

Oregon

DOUG ANDERSON
ACTING WASTE REDUCTION MANAGER
METRO
600 NE GRAND AVE
PORTLAND, OR 97232-2736

FEB 12 1997

METRO REGIONAL
ENVIRONMENTAL MANAGEMENT

DEPARTMENT OF
ENVIRONMENTAL
QUALITY

RE: DEQ Approval of RSWMP Amendments
NORTHWEST REGION

Dear Doug:

As indicated in the memo prepared by Marie Nelson dated, February 6, 1997, regarding the meeting held between Metro staff and Dave Kunz of DEQ on the above referenced topic, the following is the Department's understanding:

- 1) DEQ expects that approval of any alternatives to recommended practices listed in the adopted RSWMP will be evaluated by Metro to ensure that the alternative practice is equivalent to or better than recommended practice within the existing plan.
- 2) All amendments to the RSWMP shall be evaluated by Metro to determine if the amendment affects specific waste diversion levels, or rates, as indicated on Tables 9.2a and 9.2b will occur. Metro's analysis of the effect of the amendment on specific waste diversion levels, or rates, shall be provided to DEQ when the amendment to the RSWMP is submitted to DEQ.

Continued best wishes on the success of the RSWMP. If you have any questions or further comments, please feel free to contact me at 229-5151

Sincerely,



Ed Druback
Manager, Air and Solid Waste Sections
Northwest Region

ED:dpk