



**ZERO
WASTE**
Montgomery
County

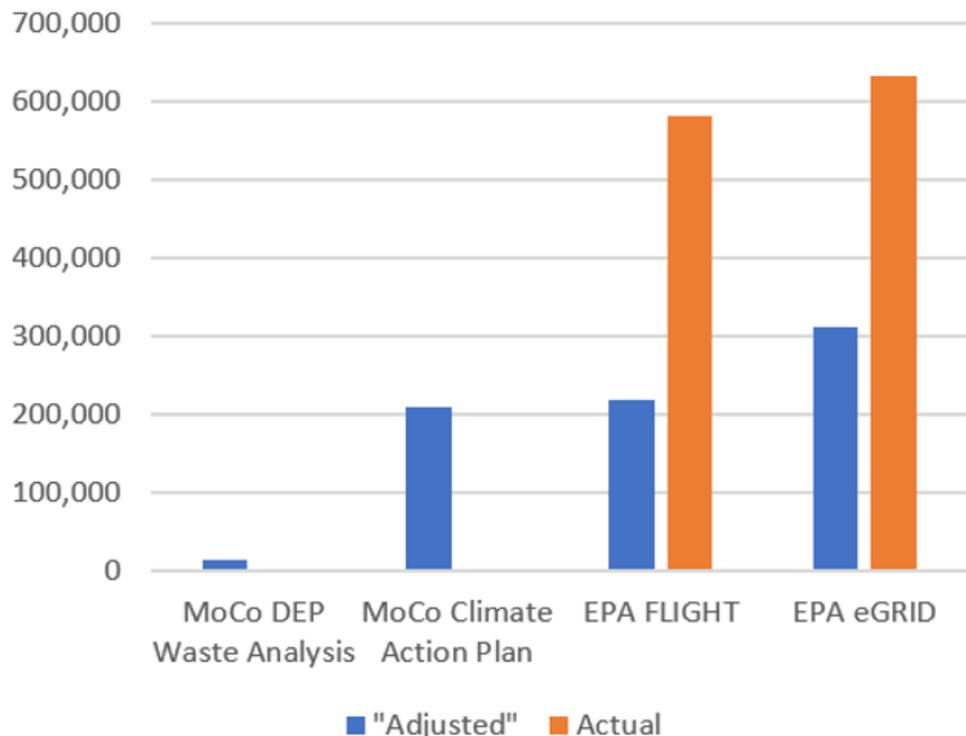
All of these numbers should be the same...

Why is DEP assuming the incinerator's emissions are 50 times lower than reported to EPA?

Figure 3-1: MCRRF 2018 GHG Emissions

Table 3-1: MCRRF 2018 GHG Emissions

What are the real GHG emissions from the incinerator?
(2018 MTCO₂e)

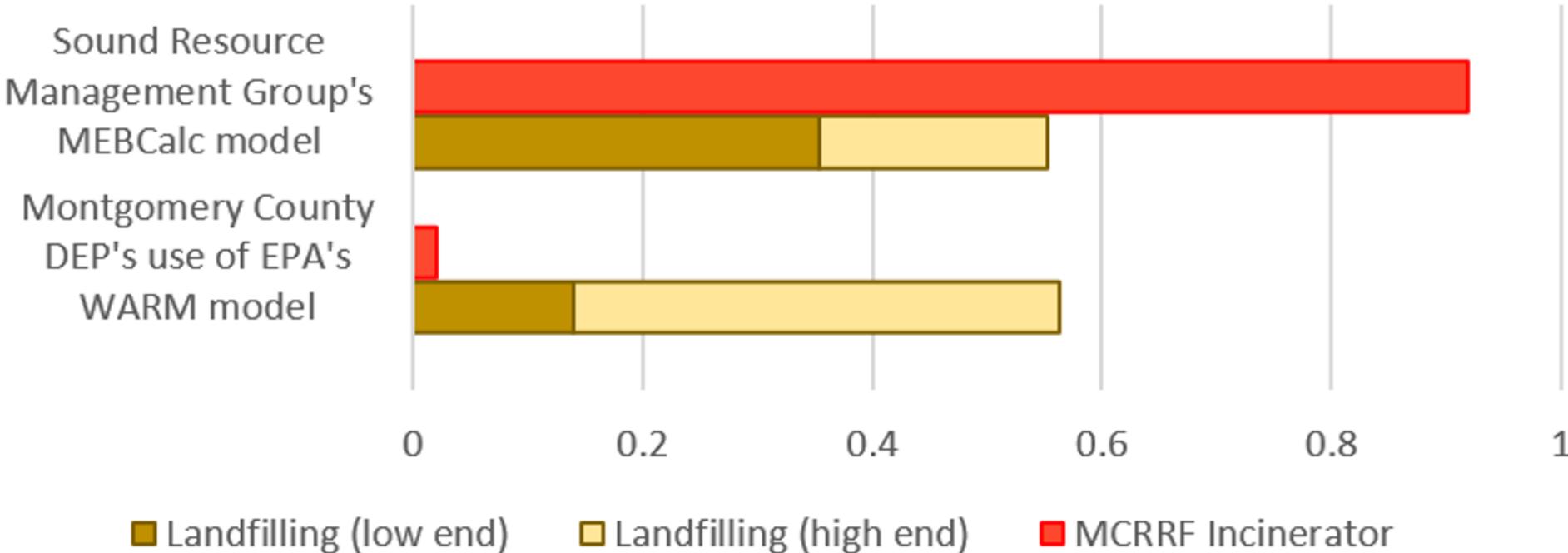


| 2018 MTCO ₂ e | "Adjusted" | Actual |
|---|------------|---------|
| MoCo DEP Waste Analysis ¹²⁴ | 12,600 | |
| MoCo Climate Action Plan ¹²⁵ | 209,558 | |
| EPA FLIGHT ¹²⁶ | 218,249 | 580,469 |
| EPA eGRID ¹²⁷ | 311,500 | 631,235 |

← These should all be the same amount, showing how much climate pollution came from the county's incinerator in 2018. Why are EPA and the county's numbers so different from their own and from one another?

Figure 3-4: DEP GHG analysis with WARM model vs. MEBCalc model GHG analysis

Metric Tons CO₂e per ton waste disposed



^a The Monetizing Environmental Benefits Calculator (MEBCalc) life cycle assessment model arrived at these numbers based on 128-700 round-trip trucking miles or 166-1,230 rail miles, and a 75% landfill gas capture rate. As found below, [transportation](#) is a minor factor, accounting for 3% of the life cycle emissions from landfilling or incineration. Rainfall and landfill gas management account for most of the variation.

^b The low end is DEP's estimate for Site 2 Landfill. 0.407 and 0.563 are DEP's estimates for landfilling by rail and truck, respectively, based on 167 truck miles to Maplewood Landfill in VA, or 615 rail miles to Tunnel Hill Partners landfill in OH.

Revelation:

Since 2016, there is no penalty for exiting the incinerator contract with 180-day notice. The ash disposal contract will be canceled along with it upon closure of the incinerator, also without penalty.

No need to wait until 2026.

| Table ES-2: Waste Disposal Options (best options in green; worst in red) | | Option 1 | Option 2 | Option 3 | Option 4 | Option 5 | |
|---|--|---|---|---|--|--|--|
| | | Incinerate until April 2026 | Incinerate through 2040 | Develop Site 2 Landfill | Landfill by Rail | Landfill by Truck | |
| Evaluation Factors | Ability to Lower Cost by Reducing Waste | No, due to fixed costs, including maintaining unused boiler in standby | | Somewhat (county would have some fixed costs and liabilities) | Yes | | |
| | Accommodates Zero Waste | Disincentivizes diversion as most efficient operation is with three boilers | | Incentives diversion to maximize landfill capacity, minimize cost | Incentives diversion to minimize cost | | |
| | GHG Emissions⁸ | 2,024 lbs of CO ₂ equivalents (CO ₂ e) per ton of waste 631,235 metric tons of CO ₂ e in 2018 including biogenic material (actual emissions reported to EPA) | | 779 – 1,220 lbs of CO ₂ equivalents (CO ₂ e) per ton of waste far less if organic materials diverted or stabilized prior to disposal; transportation emissions average about 3% in any scenario | | | |
| | Health Impacts | Most toxic option for county residents and for landfill community; unquantified health impacts from air emissions and ash residue disposal | | Potential risk to sole-source aquifer | Mitigated with remote location, site selection criteria, and diversion/processing of organic materials | | |
| | Environmental Justice | Ash currently landfilled in majority-Black communities; clustering of facilities in Dickerson; downwind impacts on diverse county population | | Clustering of facilities in Dickerson | Can select landfill in rural area that meets environmental justice selection criteria | | |
| | Ability to Provide Long-Term Solution | Annual volume larger than needed as county reduces waste, but limited to five years | Annual volume larger than needed as county reduces waste, but lifetime limited by aging of facility; vulnerable to abrupt closure | Unavailable until built, (could take 10 years depending on litigation); 30-year projected lifetime if built (depends on waste volumes) | Fairly unlimited due to available choices with >30 Years remaining capacity | Unlimited due to choice of many more facilities and a glut of regional landfill capacity in PA & VA. | |
| | Uncertainty in Cost Estimates | Highly variable cost estimates depend on electricity markets and outcomes of contract negotiations for share of capital improvements; decommissioning costs; pending disqualification of renewable energy credits will remove \$2-7 million/year in revenue | | Med-High - depends on potential litigation, construction delays, final costs once project is bid | Low once contract is in place; opportunity to renegotiate costs incrementally as tonnage decreases | | |
| | Other Environmental Impacts and Considerations | Leaves county in search of another solution in next five years | Leaves county in search of another solution in <20 years | Litigation delays; potential cleanup liability; Can reduce GHGs with removal/stabilization of organic waste | Somewhat flexible; Can reduce GHGs with removal/stabilization of organic waste | Flexible/most options; Can reduce GHGs with removal/stabilization of organic waste | |
| Capital Costs | Capital Cost⁹ | \$12-27 million in repairs At low ends, HDR has acknowledged the facility will not be in a state of "good condition and repair." | \$37-\$73 million in repairs | \$100-107 million (unclear if includes cost of access road, 30-year post closure care) | \$70 million for new rail car fleet (HDR) \$86 million (DEP) | ~\$1M+ to modify transfer station to accommodate long haul | |
| | Add'l Cap. Costs to Protect Health & Environment¹⁰ | \$60-95 million plus an estimated \$1.5 million/year to come up to modern air pollution standards and for continuous monitoring of additional pollutants that are currently only tested annually | | Material recovery (removing more recyclables) and biological treatment (anaerobic digestion for biological stabilization) (MRBT) can be privately financed at no cost to county, and made available for \$50-60/ton, dramatically reducing waste to landfill and minimizing landfill impacts. | | | |
| | Capital Cost [TOTAL] | \$72-122 million plus \$1.5 million/year | \$97-168 million plus \$1.5 million/year | \$100-107 million | \$70-86 million | ~\$1 million | |
| Operating Costs | Total Estimated Cost/Ton¹¹ | \$53.50/ton (HDR) \$64.36/ton (2020 invoice) | \$59.50/ton (HDR) \$59.31/ton (DEP) \$64.36/ton (2020 invoice) (long term prices depend on final contract negotiations and cost share) | \$44.50/ton (HDR) \$59.56/ton (DEP) | \$73-78/ton | \$50-59/ton | |
| | [includes transfer station and transportation costs; does not include externalized health and environmental costs] | ...plus approx \$2.50/ton for improvements to air pollution controls (fixed cost that will increase per ton as waste is reduced) | | | Need RFQ for hauling and disposal and estimate for rail haul reconfiguration at transfer station | Need RFQ for hauling and disposal | |

Table ES-1: Results of Life Cycle Analysis of Montgomery County’s incineration vs. landfilling options

| Impact per ton of waste transported and incinerated or landfilled | | | | |
|--|---|---|--|-------------------------------|
| <u>Impact</u> | <u>Measure</u> (lbs of equivalent emission, below, per ton of waste) | <u>Incineration</u> (MCRRF) (lbs/ton of waste) | <u>Landfilling</u> (range of 10 landfills) (lbs/ton of waste) | <u>Which is worse?</u> |
| Global warming | Carbon dioxide (CO ₂) | 2,023.89 | 779 – 1,220 | Incineration |
| Human health (toxic chemicals) | Toluene | 219.80 | 0.89 – 4.10 | Incineration |
| Smog formation (asthma) | Ozone (O ₃) [NO _x & VOCs] | 38.64 | 2.43 – 15.51 | Incineration |
| Acidification (acid rain, respiratory) | Sulfur dioxide (SO ₂) | 2.38 | 0.08 – 1.28 | Incineration |
| Human health (carcinogens) | Benzene | 0.46 | 0.005 – 1.119 | * (Depends) |
| Human health (respiratory/heart) | Fine particulate matter (PM _{2.5}) | 0.23 | 0.001 – 0.012 | Incineration |
| Eutrophication | Nitrogen | 0.07 | 0.036 – 0.159 | * (Depends) |
| Ozone depletion | CFC-11 | 0 | 0.001 – 0.004 | Landfilling |
| Eco-toxicity | 2,4-D herbicide | 0.00088 | 0.00002 – 0.00128 | * (Depends) |
| Monetized summary | U.S. Dollars | \$258.58 | \$52.37 – \$102.97 | Incineration |

Largest impact → smallest impact

Note: each measure includes weighted values of related pollutants. For example, global warming impacts include methane and nitrous oxide (N₂O) emissions, and toxic chemical impacts include mercury emissions. Impacts are weighted over a 20-year time frame. Landfill options assume a gas capture rate of 75%.

* Carcinogenicity, eutrophication, and eco-toxicity are worse from incineration compared to a landfill that flares its gas, but are worse from landfilling if landfill gas is burned for energy in an internal combustion engine.

OFFICE OF
MARY M. CHEH

Councilmember, Ward 3 | Chair, Committee on Transportation & the Environment

MEMORANDUM

To: Chairman Phil Mendelson
FROM: Councilmember Mary M. Cheh
DATE: February 25, 2021
SUBJECT: Requests for the March 2, 2021 Legislative Meeting



Because Covanta is permitted to sell renewable credits into Maryland's renewable energy portfolio (which includes "waste-to-energy" incineration as a tier one renewable energy source), much of the energy produced at the facility is displacing clean renewable energy, likely wind, resulting in a net harm to the region's clean energy efforts.

20-year CO₂e (lbs/ton of waste disposed)

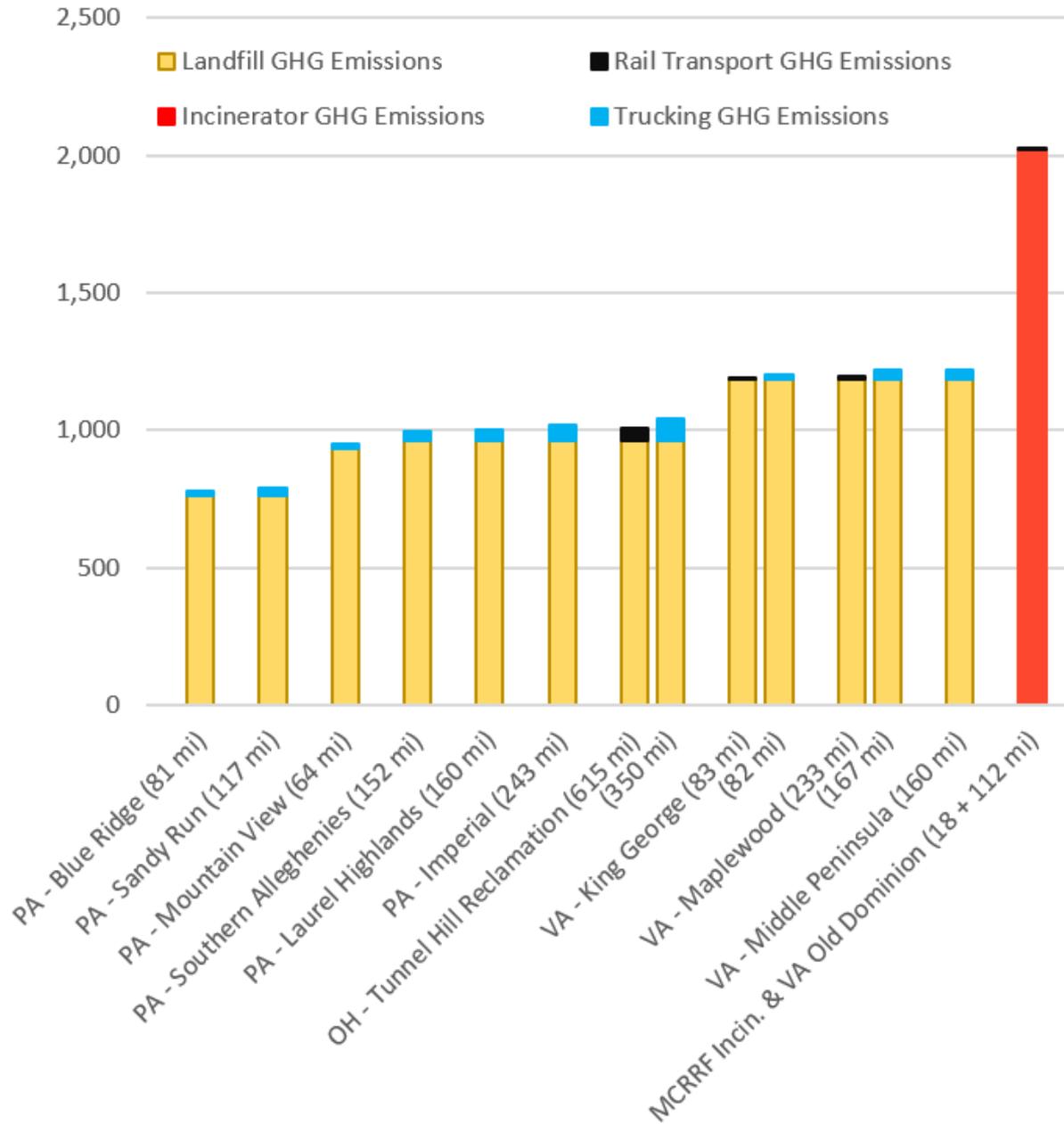
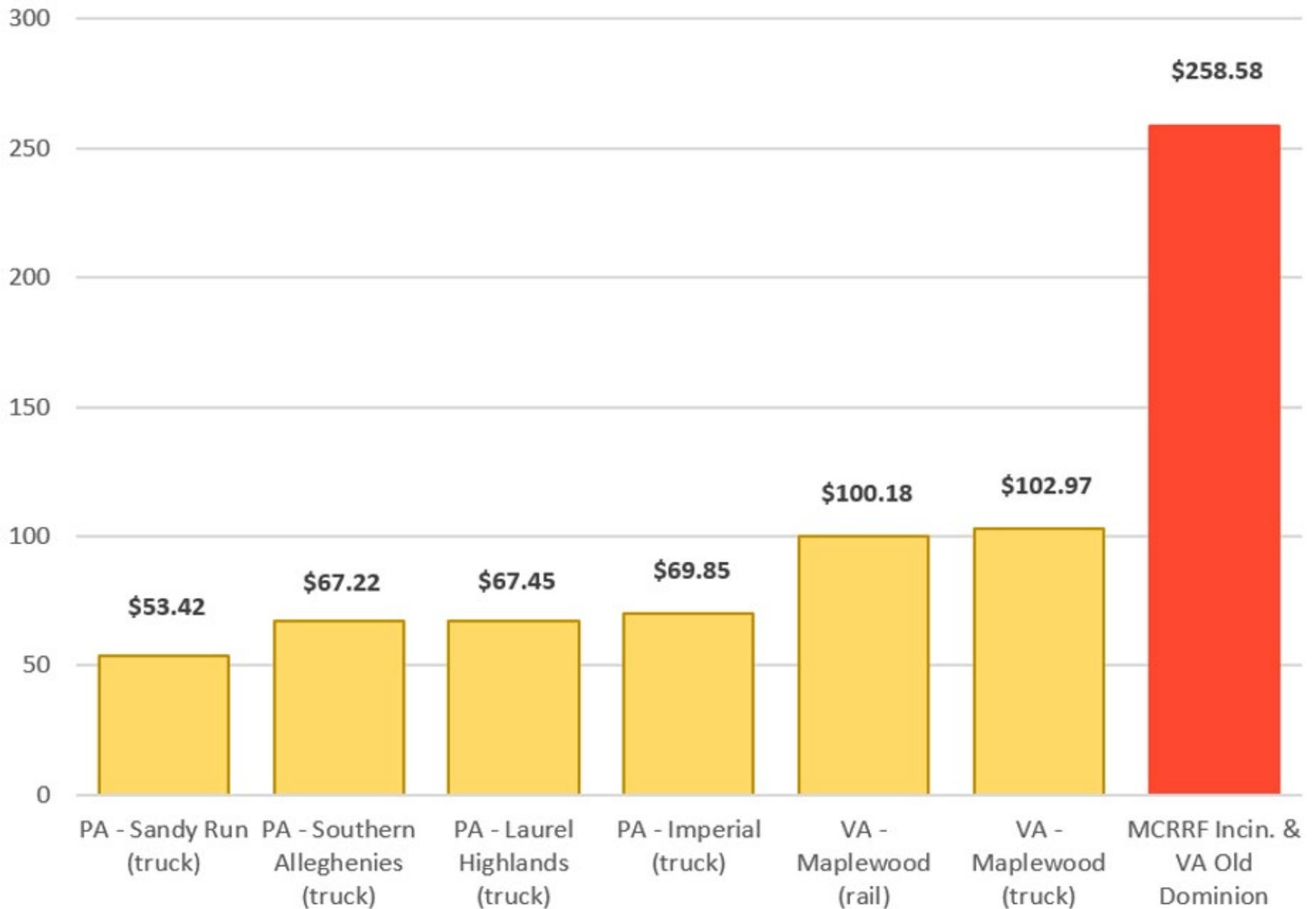


Table 4-1: Comparison of features in three major life cycle analysis tools

| Features | Life Cycle Analysis (LCA) Model ¹⁷⁵ | | |
|--------------------------------------|--|------------------------|------------------------|
| | WARM ¹⁷⁶ | MSW DST ¹⁷⁷ | MEBCalc ¹⁷⁸ |
| <u>Impacts included in model</u> | | | |
| -Climate change | ✓ | ✓ | ✓ |
| -Human health (respiratory) | | limited | ✓ |
| -Human health (toxic chemicals) | | limited | ✓ |
| -Human health (carcinogens) | | limited | ✓ |
| -Eutrophication | | limited | ✓ |
| -Acidification | | limited | ✓ |
| -Eco-toxicity | | limited | ✓ |
| -Ozone depletion | | | ✓ |
| -Smog formation | | limited | ✓ |
| <u>Monetized Environmental Score</u> | | | ✓ |
| <u>Energy Impacts Included</u> | ✓ | ✓ | limited |
| <u># of MSW Materials Included</u> | 60 | ~30 | 27 |

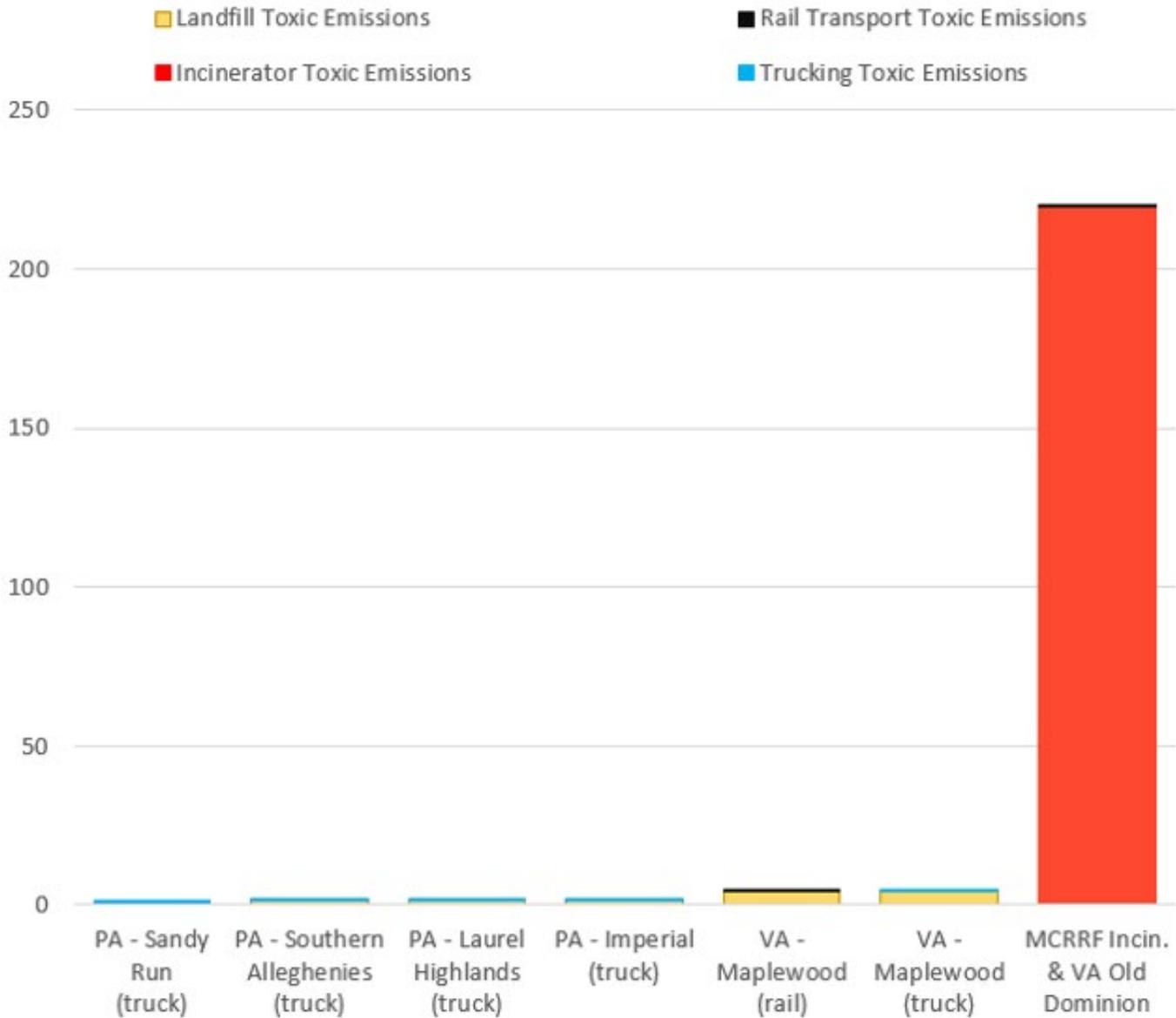
Monetized Environmental Impact

(\$ health/environmental impact per ton of waste disposed)



Human Health (Toxic Air Pollution)

(lbs of toluene equivalents per ton of waste disposed)



DEP's EJ Analysis attempting to justify Site 2 Landfill

Figure 5-2: DEP Table giving Population Density 4% weight and Race and Class 75% weight

| Revised 8/30/2020 | | | | | | | | | | |
|--|-------------------|-------------------|----------------------|-------------------|-----------------------|-------------------|-------------------|-------------------|--------------------|----------------|
| Environmental Justice Landfill Options | | | | | | | | | | |
| Criteria 1 | Criteria 2 | Criteria 3 | Criteria 4 | Criteria 5 | Criteria 6 | Criteria 7 | Criteria 8 | Criteria 9 | | |
| CRITERIA DESCRIPTION | Poverty Rate | Median Income | Median Housing Value | Populaton Density | Distance - Road Miles | Race % White | Race % Black | Race % Hispanic | Remaining Capacity | |
| | Criteria 1 | Criteria 2 | Criteria 3 | Criteria 4 | Criteria 5 | Criteria 6 | Criteria 7 | Criteria 8 | Criteria 9 | WEIGHTED SCORE |
| WEIGHT | 7 | 6 | 3 | 2 | 5 | 1 | 9 | 8 | 4 | 45 |
| | 16% | 13% | 7% | 4% | 11% | 2% | 20% | 18% | 9% | 100% |
| Landfills w/Rail Service | Criteria 1 SCORES | Criteria 2 SCORES | Criteria 3 SCORES | Criteria 4 SCORES | Criteria 5 SCORES | Criteria 6 SCORES | Criteria 7 SCORES | Criteria 8 SCORES | Criteria 9 SCORES | Rank |
| Montgomery County - Site 2 | 5 | 5 | 5 | 1 | 5 | 3 | 4 | 1 | 1 | 3.51 |
| Maplewood - Amelia | 3 | 3 | 3 | 4 | 3 | 2 | 2 | 4 | 5 | 3.18 |
| King George | 4 | 4 | 4 | 2 | 4 | 4 | 3 | 2 | 2 | 3.18 |
| Atlantic Waste | 2 | 2 | 2 | 5 | 2 | 1 | 1 | 5 | 4 | 2.62 |
| Tunnel Hill Partners | 1 | 1 | 1 | 3 | 1 | 5 | 5 | 3 | 3 | 2.51 |

Minor tweaks in DEP's weightings result in opposite conclusions

Figure 5-3: Revised Table giving Population Density 40% weight and Race and Class 40% weight

Environmental Justice Landfill Options

Revised
8/30/2020

| | Criteria 1 | Criteria 2 | Criteria 3 | Criteria 4 | Criteria 5 | Criteria 6 | Criteria 7 | Criteria 8 | Criteria 9 | |
|----------------------------|-------------------|-------------------|----------------------|-------------------|-----------------------|-------------------|-------------------|-------------------|--------------------|----------------|
| CRITERIA DESCRIPTION | Poverty Rate | Median Income | Median Housing Value | Populaton Density | Distance - Road Miles | Race % White | Race % Black | Race % Hispanic | Remaining Capacity | |
| | Criteria 1 | Criteria 2 | Criteria 3 | Criteria 4 | Criteria 5 | Criteria 6 | Criteria 7 | Criteria 8 | Criteria 9 | WEIGHTED SCORE |
| WEIGHT | 10 | 0 | 0 | 20 | 5 | 10 | 0 | 0 | 5 | 50 |
| | 20% | 0% | 0% | 40% | 10% | 20% | 0% | 0% | 10% | 100% |
| Landfills w/Rail Service | Criteria 1 SCORES | Criteria 2 SCORES | Criteria 3 SCORES | Criteria 4 SCORES | Criteria 5 SCORES | Criteria 6 SCORES | Criteria 7 SCORES | Criteria 8 SCORES | Criteria 9 SCORES | Rank |
| Montgomery County - Site 2 | 5 | 5 | 5 | 1 | 5 | 3 | 4 | 1 | 1 | 2.60 |
| Maplewood - Amelia | 3 | 3 | 3 | 4 | 3 | 2 | 2 | 4 | 5 | 3.40 |
| King George | 4 | 4 | 4 | 2 | 4 | 4 | 3 | 2 | 2 | 3.00 |
| Atlantic Waste | 2 | 2 | 2 | 5 | 2 | 1 | 1 | 5 | 4 | 3.20 |
| Tunnel Hill Partners | 1 | 1 | 1 | 3 | 1 | 5 | 5 | 3 | 3 | 2.80 |

Note: on class, all three measures have the same 1-5 scores for the five landfill options, so the choice of poverty rate over median income or housing value has no impact on the result. On race, choosing percent white is the same as saying “percent people of color” and is the most robust way to summarize impact by race.

The County Deserves a Better Analysis

DEP's Analysis

5 Landfills

Factors:

- Class (36%) using poverty rate, median income & median housing value
- Race (40%) using Black, Hispanic & White
- Population density (4%)
- Distance (11%)
- Remaining capacity (10%)

* Our analysis rules out Site 2 Landfill because it creates a new landfill in a risky location, is prohibitively expensive, would not be available in the short-term, and is not a long-term solution.

Our Analysis

42 Landfills*

Exclusion Criteria:

- Class (5 mile <\$35K median household income)
- Race (5 mile Black population >30%)
- Population (5 mile pop >20K)
- Distance (very excessive ones ruled out)
- Public ownership
- Future waste market
- Public opposition
- Gas collection system

Inclusion Criteria:

- Flaring collected gas
- Rainfall
- Smaller waste company
- Available capacity
- Rail access
- Environmental track record

Table 7-3: Best Landfill Options for Montgomery County

[Includes the 12 of 42 landfills that survived the exclusion criteria.]

| Landfill Name | Rail Miles | Road Miles | City | County | St | Owner | Operator | Annual rainfall | Available Capacity (tons/year) | Landfill Closure Year | Inclusion criteria |
|--|------------|------------|--------------|--------------|----|--------------------|-------------------------|-----------------|---|-----------------------|-----------------------|
| Upper Piedmont Regional Landfill | | 260 | Rougemont | Person | NC | Republic Services | | 50 | | 2057 | ^t |
| Uwharrie Env'l Regional Landfill | | 384 | Mount Gilead | Montgomery | NC | Republic Services | | 50 | | 2067 | |
| Blue Ridge Landfill | | 81 | Scotland | Franklin | PA | Waste Connections | | 39 | 0 | 2031 | ^{t, u, v} |
| Evergreen Landfill | | 195 | Blairsville | Indiana | PA | Waste Management | Pellegrene Construction | 53 | 200,506 | 2077 | |
| Imperial Sanitary Landfill | | 243 | Imperial | Allegheny | PA | Republic Services | | 43 | 388,381 | 2044 | ^{t, w} |
| Laurel Highlands Landfill | | 160 | Johnstown | Cambria | PA | Waste Management | | 53 | 459,223 | 2124 | ^{t, w} |
| Mostoller Landfill | | 159 | Somerset | Somerset | PA | Waste Management | | 51 | 417,681 | 2056 | ^w |
| Mountain View Reclamation Landfill | | 64 | Greencastle | Franklin | PA | Waste Management | | 35 | 237,366 | 2057 | ^u |
| Sandy Run Landfill | | 117 | Hopewell | Bedford | PA | GFL Environmental | | 40 | 203,199 (PA DEP) 73,000 (revised est.) | 2130 | ^{t, u, v, y} |
| Southern Alleghenies Landfill | | 152 | Davidsville | Somerset | PA | GFL Environmental | | 56 | 598,237 | 2091 | ^{t, v, w} |
| Maplewood Recycling & Waste Disposal | 233 | 167 | Jetersville | Amelia | VA | Waste Management | | 44 | | 2167 | ^{w, x} |
| Shoosmith Sanitary Landfill | | 180 | Chester | Chesterfield | VA | Shoosmith Brothers | | 47 | | 2070 | ^v |

^t Flaring captured landfill gas or injecting into pipelines

^u Lower rainfall

^v Smaller waste company

^w Larger available capacity

^x Rail access

^y Environmental track record

^z Cost (not filled in for lack of recent RFQ/RFP data)

The Five Best Landfill Options

- GFL Environmental's Sandy Run and Southern Allegheny Landfills in PA
(the county would need a combination because the closer landfill has limited space)
- Republic Services' Imperial Sanitary Landfill in PA
- Waste Management's Maplewood Landfill in VA and Laurel Highlands Landfill in PA

| Table ES-2: Waste Disposal Options (best options in green; worst in red) | | Option 1 | Option 2 | Option 3 | Option 4 | Option 5 | |
|---|--|---|---|---|--|--|--|
| | | Incinerate until April 2026 | Incinerate through 2040 | Develop Site 2 Landfill | Landfill by Rail | Landfill by Truck | |
| Evaluation Factors | Ability to Lower Cost by Reducing Waste | No, due to fixed costs, including maintaining unused boiler in standby | | Somewhat (county would have some fixed costs and liabilities) | Yes | | |
| | Accommodates Zero Waste | Disincentivizes diversion as most efficient operation is with three boilers | | Incentives diversion to maximize landfill capacity, minimize cost | Incentives diversion to minimize cost | | |
| | GHG Emissions⁸ | 2,024 lbs of CO ₂ equivalents (CO ₂ e) per ton of waste 631,235 metric tons of CO ₂ e in 2018 including biogenic material (actual emissions reported to EPA) | | 779 – 1,220 lbs of CO ₂ equivalents (CO ₂ e) per ton of waste far less if organic materials diverted or stabilized prior to disposal; transportation emissions average about 3% in any scenario | | | |
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| | Environmental Justice | Ash currently landfilled in majority-Black communities; clustering of facilities in Dickerson; downwind impacts on diverse county population | | Clustering of facilities in Dickerson | Can select landfill in rural area that meets environmental justice selection criteria | | |
| | Ability to Provide Long-Term Solution | Annual volume larger than needed as county reduces waste, but limited to five years | Annual volume larger than needed as county reduces waste, but lifetime limited by aging of facility; vulnerable to abrupt closure | Unavailable until built, (could take 10 years depending on litigation); 30-year projected lifetime if built (depends on waste volumes) | Fairly unlimited due to available choices with >30 Years remaining capacity | Unlimited due to choice of many more facilities and a glut of regional landfill capacity in PA & VA. | |
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| | Other Environmental Impacts and Considerations | Leaves county in search of another solution in next five years | Leaves county in search of another solution in <20 years | Litigation delays; potential cleanup liability; Can reduce GHGs with removal/stabilization of organic waste | Somewhat flexible; Can reduce GHGs with removal/stabilization of organic waste | Flexible/most options; Can reduce GHGs with removal/stabilization of organic waste | |
| Capital Costs | Capital Cost⁹ | \$12-27 million in repairs At low ends, HDR has acknowledged the facility will not be in a state of "good condition and repair." | \$37-\$73 million in repairs | \$100-107 million (unclear if includes cost of access road, 30-year post closure care) | \$70 million for new rail car fleet (HDR) \$86 million (DEP) | ~\$1M+ to modify transfer station to accommodate long haul | |
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| | Capital Cost [TOTAL] | \$72-122 million plus \$1.5 million/year | \$97-168 million plus \$1.5 million/year | \$100-107 million | \$70-86 million | ~\$1 million | |
| Operating Costs | Total Estimated Cost/Ton¹¹ | \$53.50/ton (HDR) \$64.36/ton (2020 invoice) | \$59.50/ton (HDR) \$59.31/ton (DEP) \$64.36/ton (2020 invoice) (long term prices depend on final contract negotiations and cost share) | \$44.50/ton (HDR) \$59.56/ton (DEP) | \$73-78/ton | \$50-59/ton | |
| | [includes transfer station and transportation costs; does not include externalized health and environmental costs] | ...plus approx \$2.50/ton for improvements to air pollution controls (fixed cost that will increase per ton as waste is reduced) | | | Need RFQ for hauling and disposal and estimate for rail haul reconfiguration at transfer station | Need RFQ for hauling and disposal | |

Recommendations:

- 1) Starting in calendar year 2021, the county should accurately account for waste diversion.
 - a) Stop counting ash as “beneficial use” in county recycling percentages.
 - b) Correct recycling reporting by not counting alternative daily cover (ADC) at landfills, or material sent to material recovery facilities (MRFs) that is not ultimately recycled.
- 2) Seek County Council approval for the following changes to the Waste Disposal and Service Agreements, as required in the County’s Ten-Year Solid Waste Management Plan.

Recommendations:

3) On or before Earth Day (4/22/2021), issue the following RFPs and notices:

- a) Issue an RFP for truck hauling to a landfill, utilizing the exclusion and inclusion criteria outlined within this report in order to make the most responsible choice.
- b) Give 180-day notice to the Northeast Maryland Waste Disposal Authority (NMWDA) to end the incineration contract (by 10/18/2021, if notice is given on 4/22/2021).
- c) Issue request for proposals (RFP) for a new material recovery facility (MRF) with material recovery and biological treatment (MRBT) capacity.

Recommendations:

4) On Earth Day, announce aggressive pursuit of Zero Waste strategies ready to be rolled out in 2021. Priority programs, even if just starting as pilots in 2021, should include unit-based pricing, aerobic composting of source separated organics, and a deconstruction mandate for reusable building materials.

By October 2021, cease use of the MCRRF and switch to truck hauling to one or more existing landfills. Once MRBT is operating, switch to only sending reduced, stabilized residuals to landfill.



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