

March 16, 2020

Nicole Nason, Administrator  
Federal Highway Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590-0001

**BEFORE THE  
FEDERAL HIGHWAY ADMINISTRATION**

**REQUEST OF  
NATIONAL WASTE & RECYCLING ASSOCIATION**

**SPECIAL WEIGHT LIMIT PERMITS TO BE AUTHORIZED  
UNDER THE STAFFORD ACT**

The National Waste & Recycling Association (NWRA) submits this request on behalf of the waste and recycling industry, for the Federal Highways Administration (FHWA) to issue guidance to states to issue special weight permits under the Stafford Act to enable waste and recycling vehicles to transport an increased amount of waste during the declared national emergency. NWRA asks for this special permit to enable haulers to adequately respond to waste that will be generated from the COVID-19 pandemic.

**BACKGROUND**

NWRA is the trade association representing the private sector waste and recycling industry that is essential to maintaining the quality of American life by protecting public health and the environment. The delivery of waste and recycling services impacts all residential, commercial, and industrial properties on a daily basis. Our members collect, process, and manage waste, recyclables, organics, RMW and other healthcare wastes; operate and manage landfills in compliance with all federal and state laws; manage and service truck fleets and collection vehicles; design, manufacture, sell, and service equipment and supplies.

The association's mission is to provide leadership, education, safety expertise, research, and advocacy to promote the waste and recycling industry. NWRA's goal is to ensure a climate where our members can continue to provide safe, economically sustainable, and environmentally responsible services and jobs that benefit communities throughout America.

NWRA's Safety Committee provides insights and best practices on how to prevent injuries to the industry's workers. The association convenes a number of institutes that provide leadership on landfills, recycling, and healthcare waste. The association also serves as Secretariat for the American National Standards Institute (ANSI) Z245 Equipment Technology and Operations for Wastes and Recyclable Materials. Along with our partner Informa, we collaborate on WasteExpo, North America's largest waste and recycling exposition and conference. Our educational offerings are known and respected around the world.

Our members operate in all 50 states and the District of Columbia. Waste and recycling facilities number nearly 18,000 scattered throughout the U.S., mirroring population centers. Our nearly 700 members are a mix of publicly-traded and privately-owned local, regional, and Fortune 500 national and international companies. NWRA represents approximately 70 percent of the private sector waste and recycling market.

The solid waste industry directly employs about 470,000 people as of late 2019 with a total payroll of more than \$29 billion. It is estimated that the private sector waste and recycling industry is responsible for sustaining more than one million jobs.

## **Waste and Recycling Industry Fleet Operations Overview**

The waste (garbage, trash, solid waste) and recycling (paper, plastic, aluminum, metal, compost) collection trucks that service nearly every American household and business are the most recognized part of the industry's fleet. Most Americans know these trucks when they see one as they are unique, highly-specialized vehicles.

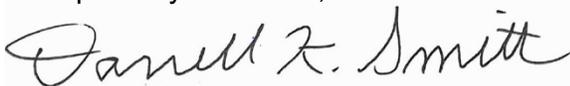
Although waste and recycling collection trucks are virtually identical in most respects, they are significantly different in the means by which the material is emptied into the cargo area (e.g. rear-, front-, automated side-load, etc.). Depending on the line of business and the size of the company, drivers may slip-seat trucks or drivers may operate several trucks per week and in many cases drive more than one truck in a single day.

**Residential collection:** The national average of daily residential stops is between 400 and 600 customers per day for rear-load trucks. Some automated collection routes, however, are capable of as many as 1,500 to 2,000 stops in a day, requiring the driver to perform an auxiliary function to operate the automated controls, but not necessarily requiring the driver to exit the truck. The driver is seated at the driving controls of the vehicle, but is unable to simultaneously perform the driving and auxiliary functions.

**Commercial collection** route trucks tend to have fewer stops than residential routes, but can average more than 80 stops per day. These stops often involve more vehicle backing and maneuvering to obtain access to the container and require the driver to perform an auxiliary function to operate the automated controls. These trucks travel on a wide variety of roadways including short distances on interstate highways, residential neighborhood streets, industrial complexes, and loading dock areas.

Thank you for your consideration to issue guidance under the Stafford Act for increased weight special permits for the waste and recycling industry.

Respectfully submitted,



Dr. Darrell K. Smith, PhD  
President & CEO



1550 Crystal Drive, Suite 804, Arlington, VA 22202