National
Waste & Recycling
Association SM

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March 1, 2019

Via Electronic Transmission: info@sweepstandard.org

RE: SWEEP Municipal Standards

The National Waste & Recycling Association (NWRA) write to provide comments to the proposed SWEEP Municipal Standard. NWRA is a not-for-profit trade association representing private solid waste and recycling collection, processing and management companies.

Based on our understanding from the February 12, 2019 National Public Information Meeting, you will not be accepting comments on The SWEEP Comment Draft from Industry Trade Associations (ITA). At the meeting, NWRA and other ITAs requested that you reconsider this. As a consequence of that discussion, we understand that you were planning on reviewing this policy with your steering committee on February 15, 2019 but have not heard any follow up decision. Could you provide an update on what was decided?

Nonetheless, with comments due by March 3, 2019, NWRA has assembled a few, cursory comments. Due to the uncertainty as to whether these comments would be considered, NWRA by no means has developed a comprehensive set of comments.

The executive description indicates that the standard would evaluate various aspects of municipal solid waste services. However, it is unclear who the standard applies to. While the national meeting clarified this, the document could benefit from more discussion. In addition, even what materials are included in this standard is lacking clarity. For example, the standard discusses municipal waste, construction and demolition waste and biosolids. However, there is no further discussion of biosolids throughout the document.

In addition, the national meeting included significant dialog on this being a leadership standard. Would this standard then require commitments for improvements regardless of how developed a program is? Or would some

communities be able to achieve the standard with their current efforts? Conversely, the description states that the standard would be achievable by governments of all sizes implying that commitments may be less onerous. How would requirements differ based on size of the municipality?

The standard could benefit from a list of definitions, including beneficial utilization, compostable, environmental footprint, and sustainable materials management.

The standard includes reducing greenhouse gas footprint with a baseline year of 2015. Would other environmentally beneficial credits also be considered? These could include land use, water consumption, fossil energy depletion, ecotoxicity, or human health. In addition, only greenhouse gas footprint has a baseline year. Why is there no baseline to compare other criteria, such as waste prevention or worker injuries?

The standard includes a section on reducing post sorting contamination/residue rates. Does this apply to the contamination in the processed materials? Or, is this the overall, facility residue rate? Landfill diversion is cited as desirable; however, no similar statement for incineration diversion exists. Does the standard prefer incineration?

Finally, NWRA serves as the Secretariat to ANSI Z245 Equipment Technology and Operations for Waste and Recyclable Materials as an accredited standards developer. SWEEP makes numerous references to the ANSI process citing the accredited consensus process. This is misleading, as it refers to standards that will not be submitted for approval as ANSI standards and thus outside the ANSI process. We suggest instead that SWEEP follow through on what is implied and become an accredited standards developer. In our role we hold the ANSI process in high regard and ask that the SWEEP Municipal Standard engage fully in the ANSI process.

NWRA appreciates your consideration of our comments. Should you have any questions, please call Anne Germain at 202-364-3724 or e-mail at agermain@wasterecycling.org.

Very truly yours,

Darrell K. Smith
President & CEO
National Waste & Recycling Association