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**Development of a Centralized Recycling Operation
for Park County and Surrounding Areas**

**Supplement to the
Integrated Solid Waste Management Plan
for Park County
June 1, 2009
Revised June 26, 2009**

**May 15, 2009
Revised June 26, 2009**

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1.0 Background and Purpose

Park County is currently developing an integrated solid waste management plan to address disposal, collection, transfer and transportation, diversion, and recycling of solid waste. Park County, the City of Powell, City of Cody, Town of Meeteetse, Powell Valley Recycling, and the communities of Clark and Crandall have been involved in discussions regarding future recycling opportunities. Additional interested parties both within Park County and the surrounding areas have expressed interest in this aspect of solid waste management.

Exhibit G contains a copy of a letter of agreement which has been signed (separately) by the City of Powell, City of Cody, Park County, and Powell Valley Recycling (PVR) in order to further the development of a centralized recycling operation to serve all of Park County. Currently, PVR, the City of Cody, and Regional Recycling, LLC are the major recyclers in the county.

Several organizational and informational meetings have been held involving the above named parties and other interested organizations and citizens. This document has been developed (and is a work in progress) to summarize the history of recycling in Park County, to explain opportunities and obstacles to recycling and diversion in the county, to describe potential budget (income and expense) items, and to list operational needs and expectations for a centralized county recycling operation.

1.1 Integrated Solid Waste Management Plan Background and Purpose

Since 1989 the Wyoming Department of Environmental Quality (WDEQ) has collected a substantial body of data showing that an increasing number of Wyoming's landfills are leaking and contaminating groundwater. To address this situation, WDEQ, at the recommendation of Governor Dave Freudenthal, convened a Citizens' Advisory Group (CAG) which included of landfill operators, municipalities, counties, elected officials, the WDEQ, and other interested citizens and groups to help it identify the key problems with solid waste disposal in Wyoming and to identify solutions to these problems. The CAG reported that there are three interrelated solid waste problems facing the state and its communities:

1. The cost to provide safe landfill disposal services to Wyoming communities will increase appreciably in future years, and a concern that much of the cost increase may be unnecessary.
2. Wyoming's recycling rate is lower than it should be.
3. Most Wyoming communities do not have the financial ability to remediate groundwater contamination caused by releases from current and historic unlined landfills. In addition, local financial constraints have significantly delayed the pace of remediation. These delays allow contamination to spread and will significantly increase the ultimate cost of remediation. Wyoming has at least 130 existing landfills. Fifty-two (52) of these are currently operating, and seventy-eight (78) are closed or abandoned. Based on WDEQ's opinion, groundwater contamination

has been identified at twenty-one (21) municipal landfills. WDEQ estimated that the total cost of remediation in Wyoming could be at least \$180 million dollars.

The CAG proposed legislation with a formula to fund the anticipated very expensive mitigation. The legislation was hurriedly conceived and did not make it out of committee. The CAG was assembled again in 2005 with additional members. Legislation developed in 2005 by the CAG was more thoroughly developed and included proposed funding for studying regional landfills with incentives for landfill permittees and jurisdictions to plan together in an effort to study every reasonable option. The “studies” are termed Integrated Solid Waste Management Plans (ISWMPs). This legislation also included funding to pay for monitoring some groundwater wells at closed and operating facilities. In 2006, the legislation, *W. S. § 35-11-1901 through 35-11-1904*, was approved. Part of the intent of the legislation is that more comprehensive groundwater monitoring should provide better tools to decide how to manage (and possibly close) landfills in the future. The Integrated Solid Waste Management Plans are also intended to encompass long range planning periods to properly consider and fully explore the costs/benefits of landfill consolidation, closure, alternative waste management methods (such as waste to energy or material recovery), and regional solid waste transfer facilities. The ISWMP planning process should result in solid waste management facilities and services which are more cost effective and in more environmentally conscious regional solid waste disposal facilities.

Park County, with four permitted landfills, is one study group considering “in county” and “out of county” options. The ISWMP is divided into four phases. The first phase was organizational to identify participants and submit a “letter of intent” to WDEQ to establish funding. The second phase was the economic analysis which was submitted to WDEQ in August of 2008 with supplemental economic data provided in December of 2008. The third phase is a draft Final Plan and the fourth phase is the Final Plan which is to be submitted to the WDEQ on or before July 1, 2009. During the past several years, Park County has been responsible for managing and administering the operation of the waste disposal facilities near Cody, Powell, Clark, and Meeteetse. Although this responsibility has been and continues to be focused primarily on waste disposal, the intent of the ISWMP process is to study all aspects related to waste management within a given planning area including the benefits, costs, and efficiency of collection, transportation and recycling. Therefore the City of Cody, City of Powell, Town of Meeteetse, the Clark and Crandall communities, Powell Valley Recycling, private solid waste handlers, and other interested parties have been involved with the planning process in compiling this ISWMP.

Solid waste programs including collection, transportation, disposal, and recycling are complex programs that are not just local programs or issues. Solid waste programs and/or issues reach across county and state borders. Therefore, the SHWD, WDEQ included incentives such that neighboring landfill entities would plan together.

Park County is pursuing this integrated solid waste management planning effort with consideration of its four landfills (Cody, Powell, Meeteetse, and Clark) and its transfer facility at Crandall. Park County has engaged interested parties both within Park County and the area since the December, 2005, in this planning effort. The following groups have attended public meetings, provided information, and have been involved with the planning effort for the ISWMP

for Park County: the City of Cody, the City of Powell, the Town of Meeteetse, the communities of Clark and Crandall, Powell Valley Recycling Task Force, private haulers which serve Park County (including Keele Sanitation and Two Tough Guys Services), the U. S. Department of Agriculture's Forest Service (USFS), the U. S. Department of the Interior's Bureau of Land Management (BLM), Wyoming Department of Game and Fish, Clark Resource Council, local press, and other interested citizens.

Even though Park County is in the landfilling business at only four permitted sites (Cody, Powell, Clark, and Meeteetse), the ISWMP requires that not only disposal be studied, but also collection, transportation, and recycling be evaluated in the options. Therefore the City of Cody, City of Powell, Town of Meeteetse, the Clark and Crandall communities, Powell Valley Recycling, private solid waste handlers, and other interested parties have been involved with this planning process.

Following is a summary of the ISWMP requirements as noted in a letter written by the WDEQ in 2007 for ISWMP participants. The legislation, on which the letter is based, states that the obligation to provide the ISWMP is that of the landfill permittee, which is Park County for this ISWMP.

“Each ISWM plan should describe the management of solid waste generated within the service area of all facilities/entities covered by the plan. The department encourages participation in a multi-jurisdictional plan, using a regional approach to waste management. Plans must be submitted to the DEQ no later than July 1, 2009. Plans must address a period of not less than twenty (20) years and must contain the following information:

- A description of the planning area covered by the ISWM plan and the names of all local governmental entities participating in the plan, including a copy of each governing body's resolution adopting the plan. This resolution was previously provided to WDEQ;*
- An evaluation of current and projected volumes for all major waste types within the planning area, including a discussion of expected population growth and development patterns;*
- An evaluation of reasonable alternate solid waste management services, a description of the selected procedures, facilities and systems for solid waste collection, transfer, treatment, storage and information about how the procedures, facilities and systems are to be funded;*
- A discussion of how the plan shall be implemented, including public participation, public education and information strategies which may include, but are not limited to, citizen advisory committees and public meetings during the preparation, maintenance and implementation of the plan;*

• *Objectives for solid waste management within the jurisdiction, including but not limited to:*

- ⌚ *Waste diversion, reduction, reuse, recycling or composting;*
- ⌚ *Waste collection and transportation;*
- ⌚ *Improving and maintaining waste management systems;*
- ⌚ *Household hazardous waste management; and*
- ⌚ *Special waste management.*

• *An economic analysis of the total cost of alternatives and final systems selected by the participating local governmental entities to achieve the plan's objectives, including capital and operating costs;*

• *Elements including:*

- ⌚ *Strategies to meet each identified objective;*
- ⌚ *A schedule for implementation; and*
- ⌚ *Any financial or other incentives offered to residents to encourage participation in local recycling programs.*

• *Each plan will need to be submitted for public review prior to submission to the WDEQ. The plan submitted to WDEQ will need to include a statement describing public comments received and how the public comments were addressed. WDEQ will review each plan to determine if the plan is complete. If the plan is not complete, WDEQ will provide a written statement identifying the elements needing to be addressed in the plan. Upon addressing the incomplete elements, the local governmental entity or entities may resubmit the plan for subsequent review by the department."*

The submittal of any part of the ISWMP to WDEQ or the acceptance by WDEQ of any part of the ISWMP does not require any affected party to implement any portion of the ISWMP. In other words, the ISWMP and this recycling document are intended to provide direction for the solid waste service providers, elected officials, and citizens. The ISWMP and this recycling document do not function as law such as a government ordinance, rule, or regulation.

Furthermore, the intent of the ISWMP and the recycling document is to provide objective information to decision-makers in Park County and to thus afford them the tools to take informed action on solid waste management issues.

2.0 Park County Recycling and Diversion Programs

2.1 Current Recycling and Diversion Programs

Recyclers in the county include the City of Cody, Powell Valley Recycling (PVR), and Regional Recycling, LLC. Other businesses within Park County also accept a variety of materials for recycling (such as businesses which must accept vehicle batteries for each one sold).

The Park County Landfills accept:

- used oil (which is recycled),
- vehicle batteries (which are recycled),
- scrap metal and white goods for recycling, and
- green waste (e.g., leaves, grass clippings, brush, manure, and tree limbs) for use as cover at the Cody and Powell Landfills only.

Composting of dead animals is conducted at the Cody and Powell Landfills. Burning of clean wood is conducted at all four landfills as conditions allow under an active smoke management permit issued by the WDEQ. Although all of these above items are not recycled, they are separately managed to allow more efficient use and diversion of the waste categories.

The Park County landfills do not charge for managing the above described special waste streams. Both current and proposed landfill operations assume that these services will continue to be provided. Both the current and future objectives with funding special waste streams in this fashion benefit both the landfill operations and patrons by the following:

Landfill patrons:

- wish to not be charged for these special waste streams,
- prefer the convenience of sorting such waste, and
- support these methods of waste diversion at the landfills.

Landfill operator:

- preserves air space by diverting special waste streams,
- reduces the potential for adverse environmental impact,
- gains income from recycling white goods and scrap metal (in years when value is sufficient), and
- improves efficiency of several aspects of the landfills' operations.

2.2 Powell Valley Recycling History and Future Plans

Powell Valley Recycling Task Force (PVRTF) was formed in 1993 in Powell, Wyoming, by members of the League of Women Voters, the City of Powell Sanitation Department, Park County Landfills, and representatives from the Chamber of Commerce, Boy Scouts, 4-H, the Powell Tribune, the Powell City Council and members of the general public.

PVRTF was renamed recently to Powell Valley Recycling (PVR). PVR's mission at its inception and currently is to conserve natural resources and reduce the flow of solid waste going into our landfills. PVR's commitment is to achieve this while educating the public about the importance of recycling and providing adequate opportunities for recycling materials throughout the Big Horn Basin.

The Park County Fairgrounds was the first location for residents to drop off recyclable materials once each month. Volunteers sorted and loaded a truck. Newspaper, computer paper, and office paper were the first materials collected, and 22 tons were recycled in 1993.

Powell Valley Recycling now accepts newspaper, computer paper, office paper, corrugated cardboard, phone books, magazines, aluminum cans, steel cans, rechargeable batteries, household shredded paper and packing peanuts, glass containers, #1 and #2 plastics. Powell Valley Recycling pays for aluminum beverage cans. The recycling center accepted 808 tons during fiscal year 2007-2008.

PVR now accepts a wider variety of recyclable materials and has increased its volume by more than 36 times its first year's volume. This illustrates how PVR's economic, staffing, and customer service strengths have grown. PVR is considered one of the premier recycling centers in the state with other centers and consultants looking to PVR for information about how PVR is operated in order to increase the efficiency of other centers in Wyoming.

Powell Valley Recycling operates in a 3,200 square foot leased building from the Boys and Girls Club of Park County. An additional lot of 5,000 square feet has an 1,800 square foot building with both the lot and building serving as cold storage. PVR also owns a 100 feet by 200 feet lot which is not currently in use. For future operations, a building of 12,000 square feet with an additional 10 acres would provide an optimum situation. However, the proposed budget for a centralized recycling operation for Park County and the surrounding areas (included in Exhibit G) considers a 7,000 square foot building with a 3 acre parcel.

Powell Valley Recycling started with volunteers only and now employs one full time manager, 2 full time employees, and 2 part time employees. Volunteers also assist the paid staff as needed. Three times each week, the City of Powell provides assistance for collection of corrugated cardboard throughout the City of Powell by using a garbage truck, and the City of Powell also assists with loading of materials for shipment to markets.

PVR in cooperation with the City of Powell's Sanitation Department provides recycling services in the City of Powell to both residents and businesses of Powell and to surrounding areas. The center is located at 535 North Hamilton Street, a leased building, with a cold storage area at 433

North Ingalls owned by Powell Valley Recycling. Hours open to the public are Monday through Friday from 10:00 a.m. to 5:30 p.m. and Saturday 10:00 a.m. to 3:00 p.m.

Services provided include:

- Residential and commercial drop-off of acceptable materials.
- Materials accepted include:
 - Newspaper, magazines, office and computer paper, catalogs, phone books, corrugated cardboard, steel cans, rechargeable batteries, Tyvek© envelopes, bubble wrap, packing peanuts, shredded paper, glass container, HDPE #2 colored and natural and PETE #1 plastics and aluminum cans (for which patrons receive cash).
- Used eyeglasses, cell phones, and ink cartridges are collected for different organizations in town as a service to these organizations. This offers a central drop off site for several organizations.
- Materials received from outside the city limits compose about 15% of the total recyclables handled by PVR.
- Direct collection of commercially generated cardboard within the City of Powell and close outlying areas is provided 3 times per week with 81 stops of which 67 have metal containers owned by the City of Powell, Park County, and Powell Valley Recycling. Collection services for cardboard are provided at a minimal cost to the businesses.
- The program currently recovers approximately 8% of the total waste stream. This calculation is based on figures in section 7.0 which lists tons received and tons charged and Table 3 and section 3.0 which segregate MSW from C&D. The Powell Landfill receives about 7,800 tons of municipal solid waste per year. During fiscal year 2008, PVR accepted 808 tons of material. About 15% of that is from communities outside of Park County.
 - **808 tons recycled X 15% = 121 tons not from Powell residents**
 - **808 tons – 121 tons = 687 tons recycled from Powell residents**
 - **7,800 tons MSW + 687 tons recycled = 8,487 total tons MSW**
 - **687 tons recycled ÷ 8,487 total tons MSW = 8%**
 - **Construction and demolition debris has not been included in the calculation of this recycling rate.**
- It is estimated that approximately 48% of the recovered materials come from the commercial businesses in the city, as a result of their participation in the cardboard recovery program. About 52% of the remaining recovered materials come primarily from the drop off program.
- Work with the court system in giving community service workers an opportunity to meet their obligations.
- Involved with work experience program for the developmentally disabled in the Powell school system.

With the anticipated MSW diversion from the Powell Landfill in 2010, Park County is in urgent need of a larger facility to be able to handle more materials and add new materials as recycling markets continue to develop. PVR owns two lots in the city with the intent of building a larger

facility. Consideration has also been given to relocating to a different site with more acreage. The integrated solid waste management planning being conducted by Park County has illustrated that it is even more imperative that PVR relocate and build (or remodel) as soon as possible.

The growth of PVR in terms of paid staff and staff hours, size of utilized facilities, volume of materials, and services provided indicates the commitment of the PVR board and staff, the City of Powell, and area citizens and businesses. Their expanded operation also illustrates the interest of citizens and businesses to continue recycling throughout a long history and changes in local economics.

The distances to markets for Wyoming recyclables and low population present challenges to recycling centers throughout the state. The offer of convenience for recycling, unflagging support, and public education will continue to make PVR a leader in the recycling community as well as an integral part of the overall integrated solid waste management strategy for the planning area.

2.3 City of Cody Recycling Program and Future Plans

Cody's recycling program was started in 1993. Before moving to its current location at 602 15th Street in Cody, the program operated with 2 cans (enclosed trailers) located in the Bob Moore Memorial Parking Lot. At that time materials accepted were newspaper, office paper, and computer paper. Aluminum cans were accepted at the recycling location, but income derived from aluminum cans was not returned to this recycling program. Aluminum cans were collected from the program by Western Recycling and a Powell citizen.

In 1994, one third of the building now used as the recycling center was obtained. In 1995, the entire building was devoted to the recycling center. The center was initially opened on Tuesdays and Saturdays. In 2001, the center was open Tuesday through Saturday from 7:30 a.m. to 3:30 p.m. In the spring of 2004, the center's hours changed to Monday through Friday from 7:30 a.m. to 3:30 p.m.

Areas on the east side of the building were fenced to allow secure areas for drop-off of recyclables when the center was not open. In 2001 a collection trailer was placed in the Wal-Mart parking lot. In 2004, wire containers were designed, built, and placed next to several dumpsters in commercial areas of the city. Those wire containers have been replaced by reconditioned dumpsters which are now labeled for drop-off of cardboard only.

In 2005, the city purchased a new, automated baler. Prior to the acquisition of this baler, cardboard was required to be broken down and placed by hand in the baler when available. The new baler allows for more efficient and safer management of materials. Also in addition to cardboard, plastics #1 (PETE) can now be baled.

In 2006, the recycling center began accepting glass for diversion. The first load of glass was diverted on September 13, 2006, and it weighed 660 pounds. Currently, about two to three loads of glass averaging about 3,000 pounds are diverted each month. The glass is used by the Cody Landfill as part of its daily cover.

On January 1, 2008, the recycling center began accepting plastics #1 (PETE). From January 1, 2008, through May 31, 2009, 2,242 pounds of plastics have been recycled. (The center estimates that sixteen 20-ounce bottles weigh about one pound.)

During 1993, 184,882 pounds of material were recycled. In 2003, 964,713 pounds were recycled. Over the course of the first 10 years of the recycling program, the amount of material recycled increased by more than 500%. In 2007, 1,644,480 pounds of material were recycled. In 2008, a total of 1,586,640 pounds were recycled. Exhibit I1 has recycling data for the City of Cody.

The program currently recovers approximately 4.5% of the total waste stream. The calculation is based on figures in section 7.0 which lists tons received and tons charged and Table 3 and section 3.0 which segregate MSW from C&D. The Cody Landfill receives about 16,900 tons of municipal solid waste per year. During 2008, Cody accepted 793 tons of material.

- **16,900 tons MSW + 793 tons recycled = 17,693 total tons MSW**
- **793 tons recycled ÷ 17,693 total tons MSW = 4.5%**
- **Construction and demolition debris has not been included in the calculation of this recycling rate.**

2.4 Special Waste Management

2.4.1 Bear-Resistant Recycling Containers

Due to the remote nature of portions of Park County, consideration should be given to acquisition and use of bear-resistant recycling containers. Ms. Tara Hodges, Bear Wise Community Coordinator, Wyoming Game and Fish Department, contributed the majority of information in this section. Ms. Hodges has been in discussions with the Park County Commissioners regarding her interest in pursuing options. Other organizations in Park County (such as Park County Landfill staff, municipal entities, and PVR have not made decisions regarding the use of bear-resistant containers. Grant monies may be available for initial acquisition of such containers and thus associated costs have not yet been finalized.

This section is provided for preliminary cost and informal purposes. Ms. Hodges' contact information is as follows:

Ms. Tara Hodges
 Bear Wise Community Coordinator
 Wyoming Game and Fish Department
 2820 State Highway 120
 Cody, Wyoming 82414
 307-272-1121

Recycling trailers which may be placed in the South Fork, North Fork, or Meeteetse (depending on how far out of town) in Park County have the potential to attract both grizzly and black bears. It is important that Park County entities consider purchasing bear-resistant recycling trailers for use in these rural areas to minimize human-bear conflicts and insure residents' safety. Bear-resistant trailers are not necessary in the City of Powell or in the City of Cody.

Depending on resident participation and frequency of servicing, rural areas of Park County will require at least a 10 cubic yard capacity trailer. With limited county or recycling program resources, a current assumption is that the trailer will be serviced once each week or once every two weeks.

Recycling trailers with bear-resistant features (with a 10 to 16 cubic yard capacity) can cost \$9,000.00 to \$36,500.00. Local quotes have not been investigated, but they should be considered in order to match trailers and equipment to local needs. See Tables PVR7 and PVR8 in Exhibit G for more description and attached spreadsheets.

Ms. Hodges has been pursuing estimates for recycling trailers. There is a wide variability of trailers' features and the type of equipment used to transport the trailers to a recycling center and equipment used to unload (if necessary) has not been determined. Tables PVR7 and PVR8 are provided as comparison of relative costs. The type of equipment available to unload the trailers and to transport the trailers will allow further investigation of trailer costs.

Grant monies may be available, with Ms. Hodges' assistance, to support the purchase of the bear-resistant trailers. The various parties with interests in recycling have not concluded who will be responsible for transport of such trailers. The cost of transportation from the rural areas and incorporated areas of Park County has been estimated in Table PVR6, Collection Container and Transportation Costs in Exhibit G. Grant monies are not available for supporting the cost of transportation to a recycling center.

2.4.2 Hazardous Waste

For the past several years, Park County Landfills have cooperated with county wide efforts (Park County Weed and Pest District, Park County, and municipalities) to sponsor household hazardous waste collection days. Various involved parties contribute designated percentages to this effort with collected waste being properly disposed by properly permitted hazardous waste contractors. These efforts have involved public education campaigns. Park County Landfills and other previously participating entities will continue these efforts as funds are available.

The WDEQ's Pollution Prevention Program Coordinator, Mr. Steve Roseberry, 307-777-7347 or SRoseb@wyo.gov serves as a resource for hazardous waste issues both at home and work. As noted later in this ISWMP, both WDEQ and EPA have an extensive educational resource list.

Park County Landfill staff conduct inspections of loads as part of their permit requirements to prevent inappropriate wastes from being disposed in the landfill. In addition to households which may generate hazardous waste, businesses can also generate hazardous waste. Special disposal requests are considered by the landfill manager in order to avoid inappropriate disposal. The landfill staff also inform disposers of potential issues, field questions at the gates and by phone regarding which materials are acceptable for disposal, and identify businesses which have a potential to dispose of inappropriate waste. Park County Landfills and their waste management partners will continue to educate the public about the use of household hazardous materials and waste prevention. They will also continue to inform businesses about hazardous waste generation issues, disposal options, and related regulatory issues.

2.4.3 Electronic Waste

Segregation of electronic waste has been investigated by the Park County Landfills. At least two contractors have been identified who routinely travel to the Park County area. At this time, sufficient funds are not available to segregate such waste. Park County Landfills do, however, provide electronic waste disposal information to those interested in funding their own recycling efforts.

The centralized recycling operation effort in Park County will also be evaluating how they can assist county citizens and businesses with recycling electronic waste. Related information can be one aspect of their public education efforts.

2.4.4 Tires

Tires are currently being baled at the Cody Landfill and Powell Landfill. A contractor is providing the baling service and transporting them to a temporary repository in Montana. The objective is that the tires will be reutilized when recycling markets rebound. The current tire recycling and reuse market presents significant challenges to Wyoming. Park County Landfills and recyclers will continue to evaluate options since a variety of factors influence both cost and markets.

2.4.5 Construction and Demolition Waste

Construction and demolition waste (C&D) waste is diverted and reused as much as possible at the Park County Landfills. Some asphalt is used as road material for roads within the landfill. Clean wood is diverted for burning according to the air permits held by the landfills.

Exhibit P is a memorandum from WDEQ which lists materials which are acceptable for placement in a C&D cell and examples of those which are not acceptable for a C&D cell. With the proposed landfill fee increase, local contractors are likely to pursue diversion opportunities simply to reduce their disposal costs. Landfill staff will continue to be diligent about allowing appropriate materials into designated cells. The construction of the new lined cell at the Cody Landfill is expected to also result in more stringent inspection of loads at the Cody Landfill in order to maintain the space in the lined cell for MSW.

Some general options which can be pursued to encourage diversion are for the county to work with municipalities to develop incentives for C&D diversion and tie those to building and demolition permits. Both the county and municipalities are limited by their existing ordinances for such waste materials. Project cost can be used to develop triggers at which contractors must divert a certain percentage from the landfill or a cost added to the building or demolition permit. If costs are added to building or demolition permits, a mechanism must be in place to use those funds for improved solid waste management.

Some of Wyoming's communities have a stipulation with demolition permits that the building inspector can require testing of building materials such as for asbestos or PCBs in light ballasts in order to prevent regulated wastes from being improperly disposed.

2.4.6 Other Special Waste Streams

The Park County Landfills accept:

- used oil (which is recycled),
- vehicle batteries (which are recycled),
- scrap metal and white goods for recycling, and
- green waste (e.g., leaves, grass clippings, brush, manure, and tree limbs) for use as cover, composting (with dead animals at Cody and Powell Landfills), or burning of clean wood (at all four landfills as conditions allow under an active smoke management permit issued by the WDEQ). The use of grass as part of daily cover may be reduced or cease when the Posi-Shell™ is used at the Cody Landfill.

Objectives of special waste stream management are to limit the potential for long term liability and adverse impact to the groundwater (such as can occur with hazardous wastes) and to divert, recycle, and reuse other waste streams such as metals.

Park County Landfills will continue to work in conjunction with municipalities, recyclers, and rural areas to continue these objectives.

2.5 Summary of Current Recycling and Diversion Programs

Although private recyclers and private waste haulers were contacted for various aspects of this and previous reports, income and expense information was unavailable. The amounts of materials recycled by any of the private recyclers were not obtained. Since income, expense, and volume handling information may be proprietary, Peak Environmental does not recommend pursuing this data further. Private recyclers (such as Regional Recycling, LLC) have not been addressed in this document. Private recyclers and other supporting private enterprises are welcome to participate in this program development at any time.

The Park County Landfills actively divert used oil, used vehicle batteries, green waste, animal waste, wood waste, scrap metal, and tires from the municipal solid waste cells at the respective landfills. Park County Landfills also participate in the household hazardous waste collection program. Park County Landfills along with the municipalities, local recyclers, and other environmental organizations provide information to the public about a variety of diversion opportunities.

PVR receives income from the sale of commodities, city support which is billed by the City of Powell to each solid waste account, business support, other gifts and donations, and rental space for a trailer stored at their facility. A list of those income streams by category is included in Exhibit G.

The City of Cody funds its recycling program with the sale of commodities and from the sanitation budget (which functions as an enterprise fund). For the City of Cody, the most recent cost information initially provided was for 2004-2005 since that is the most recent year for which sanitation (collection) and recycling were recorded separately. According to information

provided by the City of Cody, the city's recycling program currently costs the city about \$130,000 per year. Although the current recycling commodities markets are variable, the city estimates that approximately \$22,000 per year is realized from the sale of recycled materials. The city is proposing a fee to citizens and businesses to help fund the recycling budget shortfall. Specifically, the city proposes to implement fees of \$1.50 per household per month and \$5.00 per business per month (fee may vary based on collection frequency and solid waste amount) to cover the \$108,000 recycling budget. It should be noted that the city estimates that about \$75,000 is saved by the city by diverting the recycled materials from disposal at the Park County Landfills by not incurring disposal fees for the recycled amounts.

Both the PVR and City of Cody's recycling programs are at their physical capacities without major infrastructure, storage expansion, and improvements. If increased volumes are accepted at either operation, they would need to move to larger facilities. This would require larger buildings, additional equipment, increase in square footage of the property, increased staffing, and associated increase in support costs (such as utilities and fuel).

The details of what resources the City of Cody might transfer to PVR have not been determined. The development of a preliminary budget, however, allows all parties to evaluate which costs are associated with various services (collection, transportation, management, and marketing) and thus determine potential funding sources.

Exhibit G includes a proposed budget for development of a centralized county recycling operation which would, at this point, involve the PVR board as the managing partner.

3.0 Limitations to Recycling

The following are major factors that can affect recycling levels and costs:

1. Cost of fuel
This factor affects all costs such as equipment, facilities, personnel, and other daily operating costs.
2. Locations of markets for recyclables
This factor influences the availability of the markets and distance to markets.
3. Value of recyclables
Several markets have recently experienced significant reductions in recyclables' value. World markets influence the value, and thus recycling centers have little to no ability to improve upon this factor. This aspect is one that requires a strong manager with sufficient time to devote to maximizing market value.
4. Quality of recyclables
The quality of loads determines if loads will be accepted by markets and the values of the loads. The public must be willing to properly prepare recyclables and prevent rejected loads. There may be additional effort necessary on the part of a recycling center's staff to prepare loads.
5. Transportation costs
Trucking costs can be managed by the use of contracts with private haulers or by purchasing a tractor and trailer combination. If a truck (tractor/trailer) is purchased, a driver must have a CDL (commercial driver's license). Implementation of health and safety programs (e.g., in regards to drug and alcohol testing) will be necessary. Overhead costs for those health and safety programs and truck maintenance must be considered. As the number of loads increases, it becomes more cost effective to purchase a truck and add a driver to the staff. The number of loads and the timing of their delivery influence whether truck and driver acquisition or contracting is better. At this point, it appears that contract transportation offers the most flexibility for Park County's recycling programs.

Peak Environmental contacted Teton County to request information about their cost per ton for recycling. For their ISWMP, a cost of about \$190 per ton for recycling of traditional commodities (i.e., exclusive of items such as hazardous waste, yard waste, wood, and scrap metal) was developed. For fiscal year 2008, Teton County recycled 9.8% (traditional recyclables). A summary of their operation is included in Exhibit H.

Currently PVR recycles about 8% of the solid waste stream for Powell. Peak Environmental has evaluated several recycling programs throughout the state during the past few years for a variety of projects. The best recycling percentages range from about 10% to 15% of the total waste stream. This percentage does not include scrap metal recycled by scrap metal dealers, used oil or vehicle batteries, or green waste (grass clippings, leaves, branches, and other similar organic

materials). Communities which incorporate green waste into their recycling percentages generally show a significantly higher rate of recycling. The amount of metal recycled by private scrap metal dealers is unavailable due to its being proprietary information. Traditional recyclables as noted above include plastics, glass, some metals, and paper products.

Proposed increases in the Park County landfill disposal rates (projected at \$90.00 per ton in October, 2009) may result in an increased volume of recycled materials in order for generators to decrease disposal costs. Economics has been found to be a major factor with influencing volumes and types of materials recycled in other parts of the U. S.

The citizens of Park County have supported recycling efforts in many ways over a long time period. The demand for such service throughout the county illustrates that need to continue to offer and expand recycling and diversion services.

4.0 Income Sources

4.1 Introduction

The organizational structure of a recycling program determines which funding sources are available. Exhibit O1 contains a chart of eligibility (with key for acronyms).

USDA Rural Development Water and Environmental Programs (RD WEP), and USDA Rural Development Community Facilities Programs (RD CF) may be the only funding sources for a non-profit organization such as Powell Valley Recycling. (See Exhibit O1.) A government owned and operated recycling facility could be eligible for funds from more sources.

It should be noted that every funding source:

- 1) requires some type of application process,
- 2) may require partnering with other government agencies,
- 3) may require matching funds and/or loans,
- 4) will have stipulations or restrictions about how money can be used and other restrictions about the operations or policies of the receiving group, and
- 5) may have other criteria which present obstacles to the receiving organization.

This section includes brief descriptions of funding sources, and in some cases, the amount of money that might be available. The listing in this section of a potential fund does not indicate that the money would be available for Powell Valley Recycling, the City of Cody, or any other recycling organization. The funds described in this section are those which have received the most discussion to date.

4.2 Solid Waste District, Property Tax Funding

The Park County Landfills currently function as an enterprise fund which means that landfill receipts are budgeted to meet expenses.

Exhibit Q, *Wyoming Statute, Title 18, Chapter 11, Solid Waste Districts* states that solid waste districts are allowed to levy up to 3 mils of property valuation for funding of such a district. Criteria for such funding would require that a vote be held to ask the question if the district could levy such a tax. There is no guarantee that such a tax would be accepted by the Park County citizens. Although this is a funding option, it is one which requires passage by the voting citizens of Park County.

Park County established a solid waste district by resolution on February, 1984. (See Exhibit A4.) Currently, the Park County Commissioners serve as the “directors” of that district with a designated landfill manager. A district may exist without having the ability to levy taxes.

Available Funds at 3 Mils

Park County

Year	Property Value	3 Mils
2004-2005	\$524,377,133	\$1,573,131
2005-2006	\$624,820,620	\$1,874,461
2006-2007	\$721,445,601	\$2,164,336
2007-2008	\$779,332,792	\$2,337,998
Average	\$662,494,036	\$1,987,482

If a tax levy is passed by the citizens, all three mills do not have to be levied. It is Peak Environmental's understanding that the levied funds can be used for recycling.

The objective of the use of a property tax for solid waste management services is that property owners support the services. People who rent property or have no rent (i.e., subsidized housing or tourists) see increases in their rent or in goods or services purchased by the property owners passing the tax through to their customers.

4.3 Landfill Disposal Fees

A portion of landfill disposal fees could be earmarked for recycling. Since the proposed disposal fee to be implemented in October, 2009, is \$90.00 per ton (up from the current \$60.00 per ton), there will likely be resistance to adding more for recycling to that fee. Park County could evaluate the benefit of using a portion of that for recycling. The cost of the proposed Cody Landfill expansion combined with operational costs of the Powell, Clark, and Meeteetse Landfills (and associated closure costs) will determine the availability, if any, of that \$90.00 per ton for recycling. At this time, it appears to be unlikely that this is a funding source.

Should disposal fees at some point have an earmark for recycling, Peak Environmental suggests that disposal bills (tipping fee bills) list the amount for recycling and the amount for landfilling separately. Citizens who contribute to the recycling income need to be aware that recycling is a separate venture from disposal and better appreciate how both solid waste systems are operated.

As an example of potential funding, a \$5.00 per ton earmark for recycling assuming 27,000 tons disposed (Based on about what is actually charged at the landfill.) would yield about \$135,000 annually. About 36,000 tons are disposed annually in the county. Only about 27,000 tons have an associated disposal fee. The difference in tonnage includes clean-up events sponsored by the municipalities, the ability of city and town residents to dispose at no charge with proof of municipal solid waste collection bills, 5% credit for illegal disposal in city and town dumpsters, 1% credit for grass clippings, and highway, other road, and related clean-ups. Should "disposal at no assigned fee" be eliminated, the total amount earmarked could thus be increased.

The objective of funding recycling by landfill fees results in generators of larger volumes of waste being charged more. Thus the "pay as you throw" concept can encourage larger waste generators to identify diversion and recycling alternatives.

4.4 Community Support

The budget in Exhibit G estimates cities' support at about \$50,000 for the City of Powell and \$130,000 for the City of Cody which assumes a charge by the city to both residential and commercial customers. The City of Powell currently charges \$1.50 for residential accounts and other similar fees for commercial accounts. The City of Cody is currently considering a charge of \$1.50 per residential customer per month and \$5.00 per commercial customer per month. Consideration could also be given to approaching the Town of Meeteetse and the private haulers to implement a similar fee for recycling. This method presents a challenge for collecting monies from Meeteetse and rural residents.

The City of Cody could also evaluate the current cost of their recycling operation and direct those funds to PVR. Although this option may present some special legal and financial arrangements, this approach may be more feasible as far as the city's customers are concerned.

Park County could also direct money from their general fund to support PVR.

Business, private citizen, and foundation donations can also be solicited. However, PVR's experience is that this type of funding source offers a small percentage of the operating or capital expenditure budget.

4.5 Sales Taxes

Wyoming has a 4% state rate for sales and use tax. Counties may levy up to an additional 3% in local option taxes with voter approval. There are a 1% General Purpose County Optional Tax and a 1% Special Purpose County Option Tax (also known as a capital facilities tax, which is instituted at voter approval for a specific time period). These two optional taxes have been discussed as sources of funding for both recycling and landfill development costs in Park County.

Two other sales and use tax categories which are unlikely to be investigated by Park County for solid waste management purposes include

- The Resort District Tax

This was capped at 1% until July 1, 2007. After that, qualifying resort districts may levy up to an additional 3%. A resort district is an unincorporated town of less than 500 people whose main industry is tourism. The resort district tax is assessed in addition to the sales tax, and is distributed to the resort district board for general purposes. Currently only Teton Village Resort District imposes this tax.

- The Economic Development Tax

It is imposed in quarter percent increments not to exceed a rate of one percent. The economic development tax is a local option tax assessed for the purpose of economic development and business assistance projects. Currently only Goshen County imposes this tax.

A 1% sales tax could be levied on retail sales. In order to implement this tax, the issue must be placed before the voters and the issue must pass. Following is the amount of funds which could be collected.

Available Funds at 1% of Retail Sales

Year	Retail Sales	1%
2007-2008	\$553,219,000	\$5,532,199

The above figures are based on monthly distribution for July 31, 2007, through June 30, 2008, and were calculated for a period during which the capital facilities tax (Special Purpose County Option Tax) was in place. A discussion with a representative of the Wyoming Department of Revenue indicated that this was the best set of numbers to use to arrive at potential available funds. Some tax returns are delayed in receipt by the department since some pay quarterly rather than monthly. Some tax returns would be amended and arrive at various times which may or may not be included in the chosen months. Given other alternatives for selecting figures for this purpose, this selection was the best for the purpose of this ISWMP.

4.6 Grants

Grants (those sources commonly known) for a recycling center do not provide sufficient funds to purchase all of the equipment, facility, or other budget items described in the budget proposal in Exhibit G of this document. Although specific benefactors may be identified, those sources are not routinely available. Thus reliable and routine funding mechanisms must be identified and implemented.

Two grant sources listed in Exhibit G (proposed budget) are the Moyer Grant and U. S. Department of Agriculture (USDA).

The Moyer Grant was approved previously, and PVR has reapplied. The status of the Moyer Grant is not yet known, although it is likely that it would be reapproved. The Moyer Grant would be used for building a facility. It does not have a matching fund requirement.

The USDA grant would be for building construction. It requires that PVR spend its own money (such as a loan) before the grant is approved. The amount listed in this budget was an estimate; the USDA allows other amounts to be requested.

4.7 Wyoming Business Council, Community Development Block Grants (CDBG)

The CDBG Program is a federally funded pass-through grant program from the U.S. Department of Housing and Urban Development (HUD). The Wyoming Business Council is Wyoming's designated agency for administering the program. The state receives an annual funding allocation ranging between \$2,000,000 and \$4,000,000. Counties are eligible to apply for CDBG funds. There are three funding categories: Public Infrastructure Grants, Access for the Disabled Grants, and Community Facilities Grants. The application process is similar to the other state and federal programs. Applications are sent to the Wyoming Business Council.

4.8 Summary

Any of the above described individual sources or combinations of the previously described funding mechanisms can be pursued but success depends on the structure of the recycling organization as described in the beginning of this section. Funding sources should be periodically reevaluated.

5.0 Influencing Factors for Solid Waste Management Alternatives

Factors which affect recycling rates and the capacity of a recycling center are as follows:

1. Space available for storage and handling.
2. Distance to markets.
3. Population served.
4. Support funding for recycling center since market values fluctuate and since Wyoming's centers must receive funding in addition to sale of recyclables in order to operate.
5. Convenience (location of drop-off points, ease of collection if collection service is provided, and hours of operation).
6. Equipment.
 - a. Compatibility of equipment with facility.
 - b. Knowledge of equipment operators.
 - c. Maintenance and repair requirements.
 - d. Age of equipment.
7. Education and awareness about preparation of recyclables and other issues.
8. Customer service and knowledge provided by recycling center.
9. Diversity of materials accepted.

Related to space and equipment available, market value, and staffing requirements.
10. Mandated recycling

Wyoming's legislative and cultural histories are such that only limited mandates exist in the state. Cheyenne's landfill does not accept green waste (i.e., grass clippings, manure, and other yard waste or electronics).

Factors which affect landfill life include:

1. Volume of materials accepted.
2. Daily, intermediate, and final cover space.

The daily cover tends to be the category with the largest potential impact on volume. Cover is the soil or dirt used to cover the waste and which is intended to limit the amount of surface water infiltration (to reduce the potential for leachate impacts), to reduce odors associated with solid waste, to prevent vectors (such as birds and rodents) from becoming a nuisance, and to control blowing or windborne lightweight solid waste (and thus to better control litter). The use of materials such as Posi-Shell™, temporary plastic covers, or plastic covered bales can reduce the space used by daily cover. (Posi-Shell™ is a spray applied, cement-mortar coating for daily and intermediate cover and for erosion and odor control.)
3. Compaction efficiency.
4. Continual evaluation of landfill space used with time.

Surveys combined with estimated weights or volumes by time period allows landfill managers to better estimate how space is being used with time and prepare for the future.
5. Placing large or bulky items in separate locations to better control space used.

- a. To some degree this is already being done at the Park County landfills by diverting appliances, tree limbs and branches, and dead animals.
 - b. Identifying diversion of large volumes of materials such as concrete and asphalt or debris from building demolition projects can also control space used.
 - c. Use of a construction/demolition debris cell or pit, which is already being used by both the Powell and Cody Landfills.
6. Daily field engineering of operations to improve equipment and equipment operator efficiency.

Factors which affect collection costs include:

1. Distance on route.
2. Volume collected at each customer's site.
The more collected at each site, the fewer stops, and thus the more efficient each trip to the landfill.
3. Collection truck load.
A partial load transported to the landfill will be more costly (in general) than a full load. However, trucks generally cannot be parked overnight or longer to wait for a full load since the weight can create more wear on the truck and can result in nuisance odors and vectors.
4. Efficiency of route.
Aspects of this include turns, time to load and unload (For example, tight spaces can add time.), distance between stops, and distance of route from landfill.
5. Operator.
 - a. Experience.
 - b. Efficiency.
 - c. Wages and benefits.
6. Truck cost.
Truck capacity, compatibility with container, age, purchase cost, and costs for maintenance, repairs, and operation.

Additional factors which would affect the cost of this overall plan and specific elements of it are as follows:

1. Cost of landfilling at other landfills within the state.
2. Willingness of other states or other Wyoming landfills to accept Park County's solid waste and the cost of that disposal.
3. Fuel cost.
This affects the cost not only directly of equipment for collection or transfer, recycling, and disposal but also indirectly affects costs of wages and goods in all sectors of our economy.
4. Market value of recyclables on international and national levels.
5. Regulatory costs for landfills and other segments of the solid waste community.
6. Discovery of new, adverse environmental impacts that result in additional efforts.

6.0 Priorities for Budget and Operational Management

The entire operating budget proposed in this report would not necessarily be required to be available prior to PVR accepting operation of a centralized county recycling operation.

Grants (those sources commonly known) for a recycling center do not provide sufficient funds to purchase all of the equipment, facility, or other budget items described in this proposal. Although specific benefactors may be identified, those sources are not routinely available. Thus reliable and routine funding mechanisms must be identified and implemented.

Following is a proposed priority for the various budget items:

1. Personnel

The wages and benefits proposed are critical to assembling a staff with relevant experience.
2. Transportation contract

Since transportation costs can fluctuate significantly at this time, it is important to manage this budget item as much as possible.
3. Equipment
 - a. Equipment items can be prioritized.
 - b. Some equipment can be used, but it must be of a quality that is sufficiently reliable to operate the center at maximum efficiency. Many of Wyoming's recycling centers operate with aging equipment which does not meet the long term operational needs of the centers.
 - c. Equipment must be matched to the facility (e.g., overhead, width, and turning clearances).
 - d. Equipment must also be matched to the capacity of the facility (i.e., the tons being recycled).
4. Facility

The current facility can be used initially when PVR accepts county wide operation. The tons recycled and equipment acquired will determine the facility requirements. Additional research is necessary to lease or construct the best facility and location.

The current PVR board has tentatively defined the services they would be willing to provide with PVR as the managing partner of a county wide recycling program. The following paraphrased summary has been provided as general information, but the action and specific language, taken by the PVR board is included in Appendix xx.

- PVR would accept, process, and market all selected materials.
- PVR would not offer collection (and thus transportation) services.

- PVR's daily management would include
 - Establishing salaries and paying employee salaries
 - Hiring and firing of employee
 - Determine which recyclables would be accepted and the price paid for aluminum cans
 - Determine material sort requirements
 - Establish PVR annual budgets
 - Furnish and provide equipment and maintenance

- The PVR center would be open to the public and accept materials from cities, county, and rural solid waste companies. This would include acceptance of materials from outside the Park County.

- PVR would select the facility, be responsible for land and building acquisition, and be responsible for remodeling, or additions as necessary.

- PVR would work with Park County to develop adequate funding sources for the operation which includes preparing applications for loans and grants.

- PVR would be the lead organization for public education about PVR and recycling in general. PVR would offer facility tours as appropriate and offer educational booths at public events.

- PVR would reserve the right to enter into contracts with other entities for recycling activities.

- PVR will present quarterly reports.

7.0 Summary and Future Tasks

The letter of agreement signed by the City of Powell, City of Cody, Park County, and PVR shows a commitment to centralize recycling programs and to continue to offer services not offered by the commercial, private sector.

The fact that PVR and the City of Cody are at capacity at each recycling facility illustrates a demand on the part of the public for such services. The progression toward centralization combined with demand shows a need for an infusion of financial resources. Preparation of the budget in Exhibit G is a preliminary step to identifying services to be provided by various entities and funding sources.

Specific objectives of this integrated solid waste management plan (ISWMP) are listed below since recycling and diversion are part of the ISWMP and since all aspects of solid waste management are interrelated:

- 1. Permit the Cody Landfill as a lined facility for accepting municipal solid waste from all of Park County and surrounding areas (regional landfill). The permit application has been submitted to WDEQ. The first review by WDEQ has been received by Park County with responses currently being prepared.**
- 2. Continue to accept construction and demolition debris (C&D) in unlined cells at the Cody, Powell, Meeteetse, and Clark Landfills until permit expiration or renewal at each. Meeteetse is scheduled to close to MSW and C&D on June 30, 2010.**
- 3. Consider closure of the Powell Landfill to MSW and continue evaluation of transportation and transfer services for Powell area residents.**
- 4. Continue to provide ancillary services at the Cody, Powell, Meeteetse, and Clark Landfills until permit expiration or renewal. Services include acceptance of:**
 - used oil (which is recycled),**
 - vehicle batteries (which are recycled),**
 - scrap metal and white goods for recycling, and**
 - green waste (e.g., leaves, grass clippings, brush, manure, and tree limbs) for use as cover, composting (with dead animals at Cody and Powell Landfills), or burning of clean wood (at all four landfills as conditions allow under an active smoke management permit issued by the WDEQ).**
- 5. Maintain compliance with local, state, and federal regulations by solid waste management entities.**
- 6. Implement measures to minimize and prevent illegal dumping. Increased disposal costs may result in increased illegal dumping. Law enforcement, state, federal, regional, county, and other government agencies (such as Park County Commissioners, municipal councils, Wyoming Department of Game and Fish, BLM, and Park County Road and Bridge), and government attorneys must work together to take action when such events are identified. It is critical that representatives from**

these three groups commit and follow through on efforts to prevent illegal dumping and hold identified offenders responsible.

7. Develop a centralized recycling operation for Park County and surrounding areas,

8. Coordinate efforts by county, municipalities, and private or non-profit recyclers to increase diversion of waste streams and offer recycling services in areas currently with limited opportunities.

9. Continue current solid waste collection services by municipalities and private haulers with efforts to identify increased cost efficiencies.

10. Annually evaluate cost and operational accounting for every entity providing solid waste management services with consideration of multi-year planning and landfill permit time periods considered.

11. Continue current educational and informational programs and expand such programs as funding and staffing requirements allow. A copy of *A Summary of Public Education Programs for Implementation of Integrated Solid Waste Management Plans* prepared by Peak Environmental has been included as Exhibit U.

12. Create a solid waste management advisory council to further the above services.

Specific future tasks for recycling and diversion include the following:

- A. Consideration of a name change for PVR (as managing partner) to a name which reflects their expanded service area.
- B. Identification of land and development of facility plans (either new or remodeled) to meet the needs of a greater volume of recyclables.
- C. Assignment of services to various entities including transportation of recyclables from collection points to a central recycling center.
- D. Coordination with Park County Landfills, municipal entities, contractors, and others to develop systems for diversion and reduction of solid waste streams.
- E. Continued public education efforts for recycling, diversion, and reduction of solid waste.
- F. Establish goals for recycling and/or diversion rates for various commodities as appropriate.
- G. Identify markets for glass. The Cody Landfill is likely to cease acceptance of glass as part of its daily cover in the near future. The Cody Landfill will soon begin to use Posi-Shell™

(a spray applied, cement-mortar coating for daily and intermediate cover and for erosion and odor control.)

Due to the number of participants in this planning process and the number of variables in the planning process, no timetable has been developed for the above tasks. However, the Development Timeline for Park County Landfills in Exhibit D will serve as a driving force for related recycling program tasks. Additionally, the proposed Park County landfill fee increase (to \$90.00 in October, 2009) will influence the rate at which a centralized recycling program for Park County comes to fruition.

Future recycling rates of about 15% of traditional recyclables are likely to be achieved given the experience of the recycling staffs. Consideration should be given to establishing recycling rates at greater percentages with target dates and methods for achieving such rates.

Continue efforts for full cost accounting of recycling programs to allow managers and funding groups to evaluate how efforts and monies are expended, to improve system efficiency, to maximize volumes recycled, and to best meet citizens' and markets' needs. Consideration of accounting by cost and "effort" (such as personnel time, space, and other factors) by community or commodity (or other factors) can further develop system and staffing efficiency. Powell Valley Recycling has been evaluating various "effort" categories within about the past three years; this has enabled them to better facilitate their services.

At this time, an informal group of recyclers has been formed in Park County. Continued cooperation and support of this group will allow for more well established and financially secure recycling organizations. The structure of this group should be maintained as much as possible as centralized recycling plans move forward for Park County.