

I. Background

The 2015- 2025 Solid Waste and Materials Management Plan (State Plan)¹ was developed to serve as a framework to guide solid waste and materials management programs and policies at the state and local levels in Tennessee. The State Plan includes eight objectives total, with Objective 1 focused on establishing more robust solid waste management goals and better assessing progress towards achieving those goals. The Tennessee Department of Conservation and Environment's (TDEC) Office of Policy and Planning (POL) and the Division of Solid Waste Management (DSWM) formed a working group to evaluate approaches to revising the current waste reduction and diversion goal and establishing a recycling goal and to better measure progress towards achieving set goals.

II. Current Waste Reduction and Diversion Goal

Tennessee's current waste reduction and diversion goal of 25% waste reduction and diversion from Class I landfills per capita compared to a 1995 baseline was established by the Solid Waste Management Act of 1991. Under the Act, TDEC was tasked with implementing and enforcing the established goal, and methodologies for calculating progress towards this goal were specified.² The majority of reporting regions (66 total) are meeting and exceeding the current 25% waste reduction and diversion goal.³

III. Proposed Goal Changes for Waste Diversion

For the purposes of these recommendations, the following definition will be utilized.

Waste diversion: the prevention and reduction of generated waste through source reduction, recycling, reuse, or composting; any effort that redirects potential waste streams from landfill disposal.

1. Target Percentage Diversion Goal:

The first approach would establish a long-term waste diversion goal. Under this model, a statewide waste diversion goal could be established and implemented regionally over a series of target interim percentages associated with shorter timelines.⁴ It is recommended that the long-term waste diversion goal be set at 15-20% waste diversion from Class I, III, and IV landfills by 2025 with 2016 as the base year.

2. Diversion Goal based on Continuous Annual Incremental Improvement in Waste Diversion:

The second approach would remove a specific numeric goal (e.g., 20% waste diversion by 2025) from the waste diversion strategy. The waste diversion goal would be set as a percentage increase from the region's previous year's reported waste diversion amount from Class I, III, and IV landfills. Based on historical trends, it is recommended that the goal require regions to increase their waste diversion by 3% from each previous year's waste diversion level.

Under this model, if a region had achieved 20% waste diversion in 2015 from Class I, III, and IV landfills, it would need to reach 23% waste diversion in 2016 to be in compliance. If the region exceeded the goal and reached 24% waste diversion in 2016, it would not be penalized for exceeding the goal and would need to reach 26% waste diversion in 2017.

¹ Accessible at <https://tn.gov/environment/topic/sw-2015-2025-solid-waste-and-materials-management-plan>.

² T.C.A. §§68-211- 816, 821, 823, 824, 825, 861.

³ Only 5 regions in 2012, two regions in 2013, and one region in 2014 did not meet the goal.

⁴ The long-term waste diversion goal percentage would be the ultimate measure which regions are aiming to achieve. The interim targets in years between 2015 and 2025 are meant to serve as progress indicators for regions, not necessarily goals.

3. Establish a Target Per Capita Waste Reduction Goal as Recommended in the State Plan:

The third recommendation is to use the approach suggested in the State Plan. Under this approach, Tennessee would adopt a statewide goal of reducing the amount disposed from Tennessee in Class I landfills to 3.5 pounds per person per day or less by 2025.

4. Establish a Target Percentage Diversion Using Current Methodology:

The fourth option is to set a new percentage goal for waste diversion by following the existing methodology used to measure the current 25% waste reduction and diversion goal. It is recommended that the goal be set at 25% waste diversion from Class I landfills by 2025 with 2016 as the base year.

IV. Proposed Recycling Goal

For the purposes of this recommendation, the following definition will be utilized.

Recycling: the process by which recovered materials are transformed into new products, including the collection, separation, processing, and reuse of recovered materials either directly or as raw materials for the manufacture of new products.

Currently, no recycling goal exists in Tennessee. For the recycling goal, it is recommended that the calculation methodology recommended within the State Plan, tons of materials from MSW recycled divided by the tons of MSW generated inclusive of all landfills on a calendar year annual basis, be used.

The State Plan proposes a goal of recycling 40% of MSW generated in the state by 2025 from all landfills. However, based on the available recycling data and the goals of neighboring states, it is recommended that the initial recycling goal be set lower than the suggested 40% of materials in MSW generated by residents, commercial businesses, institutions, and industries in Tennessee by 2025. It is recommended that the initial goal be set at recycling 30% by 2025. It is also recommended that an interim goal of 25% by 2020 be established.

V. Comment Submittal Information

The comment deadline is Monday, April 25th at 4:30 PM CDT. Written comments may be submitted via email, mail, or fax to Seth McCormick at:

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