RECYCLING INDUSTRIES COALITION (RIC)

To the Editor:

I am writing on behalf of the Recycled Industries Coalition (RIC) regarding your November 3rd article "County Moves Forward with Recycling Company Agreement". In the article, it was reported that Berkeley County Council had authorized the execution of an agreement with RePower South to establish a municipal solid waste collection and processing system.

The Recycling Industries Coalition (RIC) is comprised of companies and industry organizations which employ thousands of South Carolinians in facilities throughout the state and countless thousands in recycling industries across the nation. Members of RIC include the Paper Recycling Coalition (PRC), Glass Packaging Institute (GPI), Steel Recycling Institute (SRI), National Recycling Coalition (NRC). Institute of Scrap Recycling Industries (ISRI), Knauf Insulation, Waste Management (WM), American Forest & Paper Association (AF&PA) and Owens-Illinois (OI). There are several issues we would like to bring to the attention of the community.

The community should understand that RePower South does not have operational recycling experience. According to the National Recycling Coalition, "Recycling is a series of activities by which material that has reached the end of its current use is processed into material utilized in the production of new products." RePower South intends to collect recyclable materials and household garbage in the same container. The result of that is the recyclable materials become contaminated by the household garbage. This contaminated material would have been valuable, both to industry and the community had it been collected separately. They will attempt to separate out some material while turning the majority of the material into pellets to be burned as refuse derived fuel (RDF). No matter what is claimed about the 'recycling rate', the objective here is to manufacture pellets to burn for energy recovery. While burning material for energy recovery is not, in and of itself a bad thing, it is not now, nor has it ever been recycling. In terms of desirable environmental practices, energy recovery is far down the list of preferred practices. We would strongly encourage the county and its citizens to give further consideration to this decision in light of the facts below.

The type of facility that is envisioned in Berkeley County is called a mixed material processing facility, also referred to as a Dirty MRF. The November 3rd article stated that the opposition to the RePower South proposal is from "competing recyclers". This implied that the material generated by the Dirty MRF would be used in the manufacture of new products. However, Dirty MRFs have generally been unsuccessful. This is because the recyclable material they generate is often not suitable as input in the production of new products. For example, cereal boxes are predominantly made from 100% recycled paperboard. Those simply cannot be made from paper that has been exposed to the items in common household trash such as diapers, animal waste, grease and household chemical waste because fiber is hygroscopic (moisture seeking) and is

RECYCLING INDUSTRIES COALITION (RIC)

likely to absorb moisture from these types of contaminants. The recent closures of the Medina, Ohio and Montgomery, Alabama Dirty MRFs should serve as cautionary tales of what can go wrong. Berkeley County has already experienced GenEarth, another new, untried, untested technology that promised the world.

Recycling is one of the direct ways that citizens can help the environment. Numerous studies have shown that Americans want to recycle and they want to buy recycled products. The message the County Council has sent by adopting a Dirty MRF is for citizens to "give up" on recycling. Recycling is a considerable part of the economic engine of South Carolina, providing thousands of good paying jobs with benefits in a sustainable industry. The people who have these jobs cannot afford for the county to give up on recycling. In order to maintain these jobs and grow, the recycling industry relies on a clean, safe supply of recoverable material. Commingling recyclables with household garbage is an irrevocable waste of a renewable resource.

Finally, a recent study, commissioned by the American Forest & Paper Association and conducted by the engineering firm of Burns & McDonnell, 1 concluded that one of the biggest issues faced by companies looking to produce refuse derived fuel (RDF) at a large scale is being able to sell the product. Power plant operators have been unwilling to purchase the RDF and co-fire the material with coal or other fuels such as natural gas. One large manufacturer of pelletizing equipment that Burns & McDonnell spoke with as part of this study said they are not aware of any company selling pelletized RDF to coal-fired power plants in the United States.

In summary, what is the likely result in Berkeley County if the proposal moves forward?

- 1) Poor and ineffective recycling.
- 2) An expensive facility with an unproven technology that has an unlikely market for either its RDF or the material it generates.
- 3) Another taxpayer debacle.

We urge the Berkeley County Council to reconsider their decision.

Sincerely,

Fran McPoland
Recycled Industries Coalition
McPoland@Collingswifthynes.com

http://www.afandpa.org/docs/default-source/default-document-library/final_mixed-waste-processingeconomic-and-policy-study.pdf