

**Windham Solid Waste Management District  
Solid Waste Implementation Plan**

**January 10, 2006**

# Solid Waste Implementation Plan

For

## The Windham Solid Waste Management District

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**Dated:** \_\_\_\_\_

**Adopted:** \_\_\_\_\_  
*Doris Knechtel, Board of Supervisors, Chair*

**Approved:** \_\_\_\_\_  
*For DEC use only*

This plan has been developed to manage solid wastes in the Windham Solid Waste Management District in conformance with the Vermont Solid Waste Management Plan (2001).

The Windham Solid Waste Management District is organized under Vermont's solid waste law, Act 78, and codified in 24 V.S.A. Chapter 121, Subchapter 3 as a union municipal district.

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# Introduction

The Windham Solid Waste Management District (WSWMD, or the District) is a public entity formed by charter through the State of Vermont in 1988. It is comprised of 17 towns that range in population from 136 to 12,005. The District is governed by a Board of Supervisors comprised of a representative and an alternate from each community, appointed annually by their Selectboards. The Charter, signed by the governor, states that WSWMD is responsible for design, implementation and administration of the programs necessary for disposing of the solid waste generated by the residents of member municipalities.

The District's mission is to provide solid waste education, recycling, management and disposal services for its member communities and other entities as the need arises. WSWMD is responsible for providing public education programs on all aspects of solid and hazardous waste management to member communities, and collection and diversion services for all wastes banned from Vermont landfills (tires, motor oil, lead acid batteries, appliances, paints, light ballasts, fluorescent bulbs, etc.). In 1995, WSWMD adopted the following goal: "...each item of waste generated within the District (should) be directed to the highest level of solid waste management hierarchy possible."

Currently, WSWMD has in place the elements of a cooperative, progressive and responsible integrated solid waste management system. The solid waste management hierarchy (source reduction, recycling, waste combustion, then landfilling) is fully represented in the District's program. The District's headquarters are based in Brattleboro, Vermont where the District maintains a 30 acre closed landfill; a transfer station; a drop-off "convenience center" for waste oil, tires, batteries, textiles, white goods, metals and yard waste; a Swap Shop for reusable items; District offices that house the administrative staff and the operations staff; a 40 tons per day Materials Recovery Facility (MRF); and, drop-off recycling depots in each member community.

For a summary of the District's history, see *Attachment D: An Historical Perspective*.

This Solid Waste Implementation Plan (SWIP, or the Plan) has been developed by WSWMD to manage solid wastes in conformance with the Vermont Solid Waste Management Plan (Revised 2001). The Plan has three components:

**A. Implementation Report** (*Framed with page borders for differentiation*)

A structured report based on the State's *Solid Waste Implementation Plans Guidance Document/Template* used as an empirical method of assessing progress. The Report is to be updated and submitted to the Vermont Agency of Natural Resources (ANR) once every 2 years.

**B. Action Plans**

Also based on the *Guidance Document*, this component addresses specific planning needs as required by the State plan. By category, the District's plans and policies are presented.

**C. Attachments**

- A. Detailed worksheets used for Implementation Report and planning,
- B. Documentation of conformance with other pertinent plans,
- C. Solid waste ordinances of member towns, and
- D. *An Historical Perspective* tracing the history of the District.
- E. 2004 Quarterly Newsletters
- F. Landfill Siting Criteria
- G. District Charter and Board Motion
- H. District Budget

# Section 1. Implementation Report

## Windham Solid Waste Management District

### A. MSW Disposal Estimate

<b>Table 1<sup>1</sup></b> <b>Total Annual MSW<sup>2</sup> Disposal Estimate</b> <b>Calendar Year 2002</b>	
Facilities/Services Used	Estimated Annual Tonnage
Curbside Pickup – Residential	14,637
Curbside Pickup – Commercial	5,062
“Fast-Trash” collections	260
In-District Transfer-stations	3,728
<b>Total Annual MSW Disposal Estimate</b>	<b>23,687</b>

1. A detailed worksheet for this table is available as Attachment A.1
2. Municipal Solid Waste sent to a landfill or incinerator

<b>Table 1a</b> <b>Diversion Rate Estimate<sup>1</sup></b> <b>Calendar Year 2002</b>	
Materials	Estimated Annual Tonnage
Recyclables Diversion	9,125
Composting Diversion	1,309
<b>Total Diversion</b>	<b>10,434</b>
MSW Disposal	23,687
<b>Approximate Diversion Rate:</b>  $\frac{\text{Recyclables} + \text{Composting}}{\text{Recyclables} + \text{Composting} + \text{MSW}}$	<b>31%</b>
State of Vermont Diversion Rate 2001 <sup>2</sup>	31%

1. Diversion rate estimate created using the methodology of the Vermont DEC diversion rate study of 2001 entitled: *Vermont’s Municipal Solid Waste Diversion Rate 2001, Final Report, September 2002*. A detailed worksheet for this table is available as Attachment A.1a.
2. From *Vermont’s Municipal Solid Waste Diversion Rate 2001, Final Report, September 2002*.

*NOTE:* Table 1a is added to the Implementation Report for District use and planning; it is not required under the *State Guidance Document*.

## B. Per Capita Disposal Rate Calculation

1.	Total annual disposal estimate in tons (from Table 1)	23,687
2.	Total annual disposal estimate in pounds	47,374,660
3.	Year-round population	33,323
4.	Seasonal population (adjusted for length of stay <sup>1</sup> )	3,497
5.	Total adjusted population (year-round pop + seasonal pop)	36,820
6.	Estimated annual per capita MSW disposal in lbs/person/yr (line 2 divided by line 5)	1,287
7.	Estimated daily per capita MSW disposal in lbs/person/day (line 6 divided by 365)	3.5
	State of Vermont's Estimated daily per capita MSW disposal in lbs/person/day <sup>2</sup>	3.7

1. A detailed worksheet for this table is available as Attachment A.2

2. From *Vermont's Municipal Solid Waste Diversion Rate 2001, Final Report, September 2002 (Table 10)*

## C. Biosolids and Septage Management and Generation Estimate

Generators	Annual Amount Generated	Location of Generators	Present Management <sup>2</sup>
<b>Biosolids</b>	In dry tons		
Brattleboro WWTF	210.37	Brattleboro	1, 2, 3
Dover WWTF (N. Branch Fire)	62.45	Dover	1, 3
Putney WWTF	21.28	Putney	4
Readsboro WWTF	0.00 <sup>3</sup>	Readsboro	N/A
Whitingham WWTF	4.26	Whitingham	3
Jacksonville WWTF	6.26	Whitingham	3
Wilmington WWTF	12.66	Wilmington	2
Winhall-Stratton (Fire District)	45.18	Stratton	3

(Table 3 continued on next page)

**Table 3** (continued from previous page)

<b>Septage</b>	<b>In gallons</b>		
Households and other non-sewered buildings throughout the District	1,675,000 <sup>4</sup>	Throughout District	1, 2, 3
Vermont Yankee	12,000	Vernon	1
<b>Other Sludges</b>	<b>In dry tons</b>		
Specialty Paper (FiberMark Inc.)	600	Brattleboro	3
Putney Paper	9,014	Putney	1, 2

1. A detailed worksheet for this table is available as Attachment A.3
2. Management Options: 1 = land application,  
2 = composting or further treatment,  
3 = landfilling or ADC,  
4 = incineration, 5 = other.
3. Readsboro has a lagoon WWTF where biosolids only need to be removed every 10 years or so.
4. Estimate based on 70 gallons of septage per person using a septic system.

**D. Facilities that Manage Biosolids or Septage in the District**

**Table 4**  
**Sludge and Septage Management Facilities in District**

<b>Facility for Final Management</b>	<b>Location</b>
<b>Land Application Sites</b>	
Vermont Yankee	Vernon, within VY Plant
West Dover site for North Branch Fire	Dover
Wilmington site for North Branch Fire	Wilmington
<b>Composting Facility</b>	
Wilmington WWTF	Wilmington
<b>Landfill</b>	
Closed Putney Paper Co Short Paper Fiber Landfill	Putney
<b>Incinerator, or other</b>	
None	—

## E. Calculation of Biosolids Beneficial Use Rate

<b>Table 5<sup>1</sup></b> <b>Biosolids Beneficial Use Rate</b> <b>Data Year 2002</b>		
		In Dry Tons
1.	Tons of biosolids landspread	147
2.	Tons of biosolids composted	31
3.	Tons of biosolids beneficially used (sum of lines 1 and 2)	178
4.	Tons of biosolids landfilled or 5. used as daily cover	163
6.	Tons of biosolids incinerated	21
7.	Tons of biosolids disposed (sum of line 4, 5, and 6)	184
8.	Total tons of biosolids generated (sum of lines 3 and 7)	362
9.	Biosolids beneficial use rate (line 3 divided by line 8)	49%
10.	Industrial residuals beneficially reused	9,014
11.	Industrial residuals disposed	600
12.	Industrial residuals beneficial use rate (line 10 / total)	94%

1. A detailed worksheet for this table is available as Attachment A.3

## F. Current Prices of Solid Waste Services

<b>Table 6<sup>1</sup></b> <b>Current Prices</b> <b>As of April 2003</b>		
Material	Facility/Service	Cost to User
MSW – curbside pick-up	Brattleboro Curbside by Waste Management	No cost to User (Paid by Town of Brattleboro @ approx. \$105 per household per year, includes contracted MSW & Recyclables collection, and MSW tip fees)
	Vernon Curbside by Triple T Trucking	No cost to User (Paid by Town of Vernon @ approx. \$141 per household per year, includes contracted MSW collection and tip fees)
	Various Small Hauling Companies	Varies <sup>2</sup>
MSW – “fast trash” services	Townshend Fast Trash	\$1.25 per bag

(Table 6 continued on next page)

**Table 6** (continued from previous page)

Material	Facility/Service	Cost to User
MSW – transfer stations	Jamaica, Stratton, Winhall	No charge
	Readsboro, Whitingham	\$1 per bag
	WSWMD, Brattleboro	\$125 per ton, \$10 minimum
	Brattleboro Salvage, Vernon	\$110 per ton
	Dover	\$2 per bag
	Wilmington	\$2.50 per bag
MSW – out-of-district facilities accepting district waste	None	—
Recyclables	WSWMD Drop-Offs	No charge to in-District users
Construction/Demolition Debris And Bulky Wastes	WSWMD Transfer Station	\$125 per ton
	Town Transfer Stations	\$12 – \$30 per cubic yard
	Brattleboro Salvage	\$91 per ton
Tires	WSWMD Transfer Station	\$3 per tire (more for larger)
	Town Transfer Stations	\$2–\$5 per tire (more for larger)
Appliances	WSWMD Transfer Station	\$12, \$18 with refrigerants
	Town Transfer Stations	\$10 – \$20
Compostables	None	—

1. A detailed worksheet for this table is available as Attachment A.6
2. Commercial haulers tend to set monthly rates based loosely on generation rate on a case by case basis. Such rates are proprietary information.

**G. Current Destinations for Wastes & Recyclables from Municipal Facilities**

**Table 7**  
**Current Waste Destinations From Municipal Facilities**

Material	Destination Facility	Fee Paid
MSW	Brattleboro Salvage T.S. (to Seneca Meadows LF, NY WSI LF, Moretown, VT )	\$91 tip fee per ton plus collection and transport
	Winhall & Stratton—WMI (to Waste USA (Coventry LF) or Hudson Falls NY, (incinerator))	\$80.22 tip fee per ton \$200 trucking per pull
Construction/Demolition	Brattleboro Salvage T.S.	\$91 per ton
	Hartford Recycling Center, WRJ, Vermont	\$88 per ton
Tires	J.P. Routhier & Sons Littleton, MA	\$95 per ton (more for larger)
Recyclables	Collected, processed and marketed by WSWMD	N/A

## H. Contracted or Anticipated Disposal Facilities for Next 5 Years

### *Disposal Facilities for MSW:*

- Brattleboro Salvage Transfer Station, which uses Seneca Meadows Landfill in Waterloo, NY and the WSI Landfill in Moretown, VT.
- Private Haulers (e.g. Casella for Stratton and Winhall)

### *Disposal Facilities for Construction/Demolition Debris:*

- Brattleboro Salvage Transfer Station, which uses Seneca Meadows Landfill in Waterloo, NY and the WSI Landfill in Moretown, VT.
- Hartford Recycling Center, White River Junction, Vermont, which grinds the material for use as alternate daily cover in the Lebanon, NH landfill.
- Private Haulers

The District anticipates continuing to use the Brattleboro Salvage transfer station and private haulers for the next five years. The District does not foresee hauling waste directly to disposal facilities itself. Brattleboro Salvage and private haulers use a variety of disposal facilities located in Vermont, New York, New Hampshire, Massachusetts, and elsewhere.

## I. HHW/CEG Collection Programs

Collection programs for household hazardous wastes, conditionally exempt generator wastes, landfill banned wastes, and special wastes generated in the District are provided through:

### **Permanent Drop-Off Facility**

Location:	WSWMD MRF and Transfer Station
Available:	Mon – Fri 8:00 – 3:30, Sat 8:00 – 12:00
Materials Accepted:	Oil-Based Paint, Used Motor Oil, Fluorescent Light Bulbs, Mercury Thermometers, Computers and Electronics

### **HHW/CEG Collection Events**

Date of last 4 collection events:	November 5, 2005
Locations:	Brattleboro Townshend Wilmington Winhall
Number of collection events per year:	4
Date of next collection event:	November 4, 2006
Location:	Brattleboro Townshend Wilmington Fourth location to be determined

## J. Summary of Illegal Disposal Problems

In 2005, no complaints of illegal burning or dumping were lodged with the District.

## Section 2. Waste Diversion Action Plan

From the *Solid Waste Implementation Plans Guidance Document/Template*:

To strive towards the 50% statewide waste diversion goal, ANR estimates that the average per capita municipal solid waste disposal rate statewide will have to be reduced from 3.4 pounds per person per day to under 2.7 pounds per person per day. In order to meet this goal, all towns and waste districts must take steps to divert MSW generated in their jurisdiction from disposal.

Although the stated goal of the State is to reduce the per capita disposal rate of municipal solid waste, it must be noted that this goal runs against historical patterns. In the document, *Vermont's Municipal Solid Waste Diversion Rate 2001, Final Report, September 2002 (Table 10)*, per capita disposal shows an upward trend, despite great strides in diversion of materials achieved in the 1990's:

State of Vermont Historical Diversion Rate Calculations			
Year	Diversion Rate	Annual lbs. disposed per capita	Daily lbs. disposed per capita
1987	12%	1,136	3.1
1994	35%	1,068	2.9
1998	34%	1,269	3.5
1999	35%	1,227	3.4
2000	33%	1,273	3.5
2001	31%	1,335	3.7

The current per capita disposal rate for WSWMD is **3.5** pounds per person per day (from Table 2 in Section 1B), below the statewide average for 2001 listed above. The WSWMD will continue to attempt to minimize the per capita MSW disposal rate, and increase waste diversion, through the “action steps” outlined below in Sections 2 through 7.

Current funding for recycling and facility-related services comes from assessments to member towns and user fees. Current funding for special projects such as educational programs, outreach projects, and pilot collection projects comes from an annual grant awarded to the District by the U.S. Department of Agriculture Rural Utility Service. This grant period ends September 30, 2006. Although the District is applying for further funding under this program, such funding may not be forthcoming in the future. In such case, the District has other funding sources it will use to fund its programs, including its tax authority.

## **2A. Goal: Reduce waste generation and reduce toxics use.**

### *Action Steps:*

The following programs will be continued into the future and enhanced as follows:

***Education/Outreach*** — The District mails a quarterly newsletter and recycling and resource guide to all member households. The mailings include how-to information and encouragement of reduction of waste.

*Assessment:* This program is highly successful in reaching members as indicated by feedback the District receives.

*Future Improvements:* Newsletters will continue to be produced and mailed to member households. Newsletters will include waste-reduction information and tips.

***Composting*** — Composting is an effective method in achieving waste reduction. See Section 2I for details on the District's composting programs.

***Procurement Strategies*** — The District purchases low-waste-generating and recycled-content supplies for its own use, and encourages District businesses to do so during waste audits or technical assistance work.

*Assessment and Future Improvements:* Procurement strategies generally need to be part of a larger waste-reduction plan. The District has a campaign planned to outreach to businesses for this and other issues (see Section 2J).

***Toxicity Reduction*** — Reducing the toxicity of waste is an important form of waste reduction. Please see Section 4B for details on the District's toxicity reduction efforts.

***School Presentations*** — School programs will continue to be provided free of charge to District schools. The presentations speak to wise use of resources which includes encouragement of waste reduction. See Section 2J and Attachment E for details.

## **2B. Goal: Increase reuse.**

*Action Steps:* The following programs will be continued and enhanced as follows:

***District Reuse Facility*** — At its Old Ferry Road site, the WSWMD operates a reuse center on Saturdays from April till November. An enclosed 24' by 60' shed hosts the thriving drop and swap center. Unwanted items in working condition can be left in the shed at no charge. Volunteers organize and display the materials for anyone wanting to come and look at what's available. Items can be taken away at no charge by those wishing to reuse the items.

*Assessment and Future Improvements:* The swap program is a successful waste reduction tool and will be continued. Over the next few years the District will improve its usefulness by opening it on a limited basis through the winter.

***Web Site*** — The District web site (WSWMD.org) includes a web-based swap shop where residents and businesses can post items to give away as well as items wanted. This service is available year round.

*Assessment and Future Improvements:* The online swap is a very successful program and will be maintained. A tracking system for the number of items listed on the site is in place and will be reviewed periodically to gauge the usefulness of the service.

**2C. Goal: Increase the residential recycling participation rate, capture rate, collection efficiencies and types of materials recycled.**

*Action Steps:*

The following programs will be continued into the future and enhanced as follows:

***Easy Recycling*** — The District provides full-service drop-off centers for each of its member towns. The District's recycling system consists of commingled collection with subsequent sorting at its MRF.

*Assessment and Future Improvements:* Commingled, conveniently located recycling has increased recycling more than 13% over the last 4 years. The District will offer new materials for collection when markets allow. The District will continually assess the way in which it provides recycling services to members and, in response, change locations, pick-up schedules, and types of containers as necessary to improve the service.

***Outreach*** — The District hosts an active web site ([www.wswmd.org](http://www.wswmd.org)) with detailed information about how, where, and why to recycle. The quarterly newsletters also regularly encourage recycling with specific examples and inspirational columns.

*Assessment and Future Improvements:* The District receives frequent responses from the website and newsletter. Also, the MRF sees an affect on material coming in from articles in the outreach materials. The District will continue its outreach program (see Section 2J for details) including a new media campaign to increase recycling within the period of Plan.

***MRF Residuals Reduction*** — Residual material from the recycling process is a waste destined for the landfill. The District Materials Recycling Facility generates residuals at a rate of about 7% of incoming material.

*Assessment and Future Improvements:* Although such a residual rate is a normal consequence of collecting recyclables from the general public, reducing the rate of material sent to the landfill indicates progress. Within the next few years, the District will embark upon a pilot program to separate compostable residuals and send them for composting through the new commercial composting program (see Section 2I). If successful, this program could reduce waste destined for disposal at a rate of 35 to 40 tons per month.

**2D. Goal: Increase the seasonal home participation rate.**

*Action Steps:*

The following new programs will be implemented during the term of this Plan as follows:

***Access*** — The District will contact local property maintenance companies to investigate providing and servicing recycling containers for the seasonal homes they maintain. Ensuring access for towns and maintenance companies to District recycling containers would be part of the program.

***Awareness*** — The District will provide door hangers for property maintenance companies to leave for their customers describing the recycling program(s) available for their use. And the District will provide inserts for town governments to include in tax bills or other mailings to property owners.

**2E&F. Goal: Increase the commercial and institutional recycling participation rate, capture rate, collection efficiencies and materials recycled.**

*Action Steps:*

***Outreach*** — The District sometimes includes information for commercial and institutional recycling in the District quarterly newsletter. Other initiatives are implemented from time to time. For example, in 2003, 54 businesses in the District were targeted and directly contacted via telephone to offer and promote services provided by the District.

***Future Improvements:*** The District will increase its emphasis on commercial and institutional recycling in the quarterly newsletter. Another canvassing initiative will be done to contact businesses and offer District services within the term of this Plan.

Services proffered will include:

- Site visits
- Waste audits
- Technical assistance
- Referrals to other assistance providers including the EAD
- Container and trucking service by contract (direct service)

***Direct service*** — In the last few years, several accounts have been set up where commercial recyclables are directly brought to the District facility.

***Assessment and Future Improvements:*** The direct service improves both the amount recycled and the cost-effectiveness for the business. The newsletter will include articles regarding the “haul your own” recyclables service offered. When potential candidates for direct service are identified by the District, the company will be contacted directly and offered the service.

***Future Improvements: Facilitation*** — The District will offer a new program targeting businesses who do not have the economy of scale to handle recyclables alone. The program will encourage commercial recycling through facilitation of a consortium. The goal will be to create an economy for recycling a certain type of material by pooling material of several neighboring commercial groups (e.g. bottle recycling by restaurants with bars serving a strip near a ski area). Such an initiative will be embarked upon within the term of this Plan.

**2G. Goal: Prevent the disposal of marketable recyclables.**

*Action Steps:*

The following programs will be continued into the future and enhanced as follows:

***Load Checks*** — Scale house attendants regularly performs load checks of material entering the facility, and have marketable recyclables removed from the load.

***Convenient Recycling*** — Commingled, conveniently located recycling centers in the District provides incentive to recycle.

***Control of Recyclables Destination*** — The WSWMD manages its own MRF, and subsequently the destination of recyclable materials. All material separated at the MRF is marketed through recycling avenues, not through disposal.

**Unit-Based Pricing** — The District encourages unit-based pricing which reduces the disposal of marketable recyclables (see Section 5 for details).

**Ordinances** — Two member towns, Brattleboro and Winhall, have mandatory recycling ordinances.

*Assessment and Future Improvements:* Mandatory recycling ordinances have mixed success. The District Board of Supervisors will put a mandatory recycling ordinance on the agenda for discussion within the next two years.

## **2H. Goal: Increase construction and demolition debris (C&D) reduction, reuse and recycling.**

*Action Steps:* The following programs will be continued and enhanced as follows:

**Supporting State Efforts** — The District supports in policy and with staff time the efforts of the Vermont DEC to improve C&D recycling effectiveness in the state, including distribution of the C&D resource guide for contractors and haulers.

**Outreach and markets** — The District has been discussing a building materials reuse program with a local entrepreneur.

*Assessment and Future Improvements:* A local building materials reuse company would greatly increase the accessibility of C&D reuse and recycling in the area. The District will support this budding business through promotion on the web site and at the Convenience Center, and other ways whenever possible.

**Encouraging Higher Use** — The District will also work with local contractors to encourage the separation of C&D material for use as alternate daily cover. A separate roll-off container for C&D materials is available at the District Convenience Center. At the time of preparation of this plan, C&D is charged the same fee as MSW.

*Assessment and Future Improvements:* The District will review costs of transport and disposal to determine if there is a way to decrease the cost for C&D disposal to encourage additional reuse.

## **2I. Goal: Increase organic waste recycling (leaf/yard, food waste, brush, stumps, appropriate papers).**

*Action Steps:*

The District has focused its composting programs on home composting. The District supports backyard and institutional composting by providing to residents, schools, or other District groups: Inexpensive recycled plastic bins, designs for home-built composting bins, composting books, and technical assistance on how to compost.

*Assessment:*

- The compost bin sale is successful as indicated by being one of the most successful in the state. Since inception of the program the District has sold over 800 bins in a district of around 33,000 people.
- An established and successful commercial-scale composting programs for restaurants, grocery stores, and institutions is lacking due to the difficulty of implementing such programs in rural areas.
- Schools could be revisited.

*Future Improvements:*

- The District will continue the annual bin sale.
- The District has been engaged in starting a new commercial composting program partnership in the region. This is an exciting new program with the District, a hauler, a farm, interns, and businesses working together to remove organics from the waste stream. The DVD of the program and how it works is currently very popular, indicating demand for the program. This program will be grown and expanded by the District over the next few years.
- The District will, within the next few years, visit schools serving member towns to encourage on-site composting and/or use of the new commercial organics diversion program, and will distribute literature regarding home composting through the students.

**2J. Goal: Implement an ongoing waste diversion education/information/outreach program for schools, youth, consumers and businesses.**

*Action Steps:*

Much of the programs outlined in Sections 2A – 2I are part of a comprehensive outreach program. The education and outreach program will continue to include:

**Quarterly Newsletters** — Direct-mailed to residents and businesses with information on waste-reduction, recycling, HHW, and more.

*Future Improvements.* Continue quarterly production of newsletter with increased emphasis on commercial waste programs and HHW.

**Web site** — Comprehensive web site updated regularly ([www.wswmd.org](http://www.wswmd.org)).

*Future Improvements.* Continue to update the site regularly with educational information and event notifications, at least twice per year.

**MRF tours** — 1½-hour tours of the MRF are provided to schools and other organizations and individuals, at a rate of about 15-20 per year.

*Future Improvements.* Continue providing the tours free of charge.

**In-school presentations** — The District currently provides about 10 in-school presentations per year.

*Future Improvements.* Continue to provide in-school programs. Also,

- Work with AVR to get more of their theater programs into the schools as kick-offs to new initiatives, with a goal of 5 theater programs per year.
- Embark on a marketing campaign to encourage schools to request the *HHW/Cleaning Products* program which was once popular but has seen weakened demand.

**School Curriculum** — The District provides many waste-related curriculums free of charge to schools. The most popular are “Teaching Toxics” by AVR, “Feed It to the Worms,” and one on the plastics industry for middle schoolers. Teachers visit WSWMD offices and take curriculum about a dozen times per year.

*Future Improvements.* Develop and offer a curriculum for high schoolers on vermicomposting.

**Educational Videos** — The District currently provides copies of several videos to schools or other groups. The 30-minute video of the MRF operations, *Buy & Bye*, still is very popular with schools.

*Future Improvements.* Several new videos will be produced and distributed during the term of this plan.

**Technical Assistance to schools** — The District currently provides technical assistance to schools on a regular basis. Usually this consists of answering questions over the phone on subjects such as acceptable materials, and setting up contracts with haulers.

*Future Improvements.* Continue with technical assistance. Also,

- Implement a container grant program to help schools start up programs within the term of this Plan.
- Perform outreach to schools to encourage and assist them in joining the new commercial composting program.
- Also see new initiatives in “*Toxicity Reduction: Schools*” in Section 4B.

**Businesses** — See Section 2 E&F for details on the business outreach for recycling, and see Section 4B for the business outreach program for hazardous waste.

**Transfer Station Operator Training** — The District has been implementing a transfer station operator training course to its member towns over the last two years.

*Assessment and Future Improvements.* The course has proved very popular and, through an outside grant source, the District has taken the course on the road to the rest of Vermont. Improvements have been made during the state-wide implementation. The District will bring the improved program back to the Windham County operators for a refresher, and add new chapters, such as one on customer service, within the term of this Plan.

**Recycling Campaign** — A new media campaign aimed at increasing recycling rates within the term of this Plan.

### **Section 3. Biosolids and Septage Management Plan**

Recognizing that biosolids and septage are defined as “solid waste” by the State of Vermont, the District must address the management of the material.

**Biosolids:** There are eleven (11) wastewater treatment facilities within the District as listed in Table 3, Section 1C. They use several different methods of management for the biosolids they produce, as detailed in Section 1.

**Septage:** Septage in the District is handled by private septic companies. How these companies manage the septage they collect is regulated by the State of Vermont.

### 3A. Acceptable Management Options for Biosolids and Septage

<b>Table 8 Acceptable Management Options for Biosolids and Septage<sup>1</sup></b>	
<b>Management Option</b>	<b>Check if Acceptable</b>
Land Application	<input checked="" type="checkbox"/>
Composting or Further Treatment to Qualify for Distribution	<input checked="" type="checkbox"/>
Landfilling or Use as Landfill Cover (both require dewatering)	<input checked="" type="checkbox"/>
Incineration	<input checked="" type="checkbox"/>
Regional septage receiving and /or treatment facility	<input checked="" type="checkbox"/>
Other wastewater treatment plants	<input checked="" type="checkbox"/>

1. Choosing an option as acceptable does **NOT** mean the District has to site such a facility nor does it mean specific facilities are “included in” the SWIP. See Table 12 for a list of facilities “included in” the SWIP.

### 3B. Current Percentage of Biosolids Beneficially Reused

49% Municipal Biosolids (from Table 5, in Section 1)

94% Industrial Residuals (from Table 5, in Section 1)

### 3C. Barriers to Beneficial Reuse

Each municipality must decide for itself what manner of disposal of biosolids is appropriate given environmental, financial, and political restraints. Windham County has become less agrarian in the recent past. Concurrently, land application of biosolids has become increasingly viewed as less appropriate than other management options. Furthermore, those wishing to land apply often find the certification process for land application sites in Vermont to be expensive and arduous, and not feasible for small projects. Although WSWMD will not (and cannot) take action against municipalities who choose disposal options, the District will support municipalities who choose beneficial management options.

### 3D. Identification and Reduction of Contamination in Biosolids

In 2002, the District partnered with the Vermont DEC, the Town of Brattleboro, the Bonnyvale Environmental Education Center, and the Vermont Business Environmental Partnership in an innovative approach to reducing contamination in biosolids. The parties worked together to identify sources of contamination and to mount a campaign to reduce contamination, culminating in a 30-minute video entitled “A Drop in the River” which was aired to the community and continues as an available resource.

### 3E. Public Outreach on Biosolids and Septage

In addition to distribution of “A Drop in the River,” the District will continue its Household Hazardous Waste program which contains outreach on the reduction of toxics in the home and proper management of leftovers (i.e. not pouring it down the drain) with the goal of reducing toxics in the wastewater and therefore in biosolids and septage.

## Section 4. HHW, CEG, Landfill Banned, & Special Waste Plan

Statute (Title 24 V.S.A. Section 2202a) outlines the following priorities for municipal HHW/CEG/special waste plans:

- Reduce or eliminate the use of hazardous or toxic substances;
- Reduce the generation of hazardous waste;
- Proper management of HHW/CEG waste; and
- Reduce the toxicity of the waste stream.

### 4A. Specific Waste Management Options

<b>Table 9</b> <b>Collections for HHW, CEG, Landfill Banned, and Special Wastes</b>		
Waste	Collection/Drop-Off Location	Cost to User
<b>Automotive Wastes</b>		
Waste Oil	WSWMD Convenience Center	No charge
Oil Filters	WSWMD Convenience Center	No charge unless commercial: \$.20–.40
Tires	WSWMD Convenience Center	\$3 (more for larger)
Antifreeze	HHW Collection Days	No charge
Lead-Acid Batteries	WSWMD Convenience Center	\$3
<b>Household Related Wastes</b>		
Pesticides	HHW Collection Days	No charge
Household Chemicals	HHW Collection Days	No charge
Oil Paint/Related Wastes	WSWMD Convenience Center	No charge
NiCad, Lithium, Batteries	WSWMD Convenience Center	No charge
<b>Waste Electrical Products</b>		
Fluorescent lights / ballasts	WSWMD Convenience Center	\$0.125 per linear foot
Computers	WSWMD Convenience Center	\$10 per system \$5 per component
White Goods	WSWMD Convenience Center	\$12 no CFCs \$18 with CFCs
<b>Other Special Wastes</b>		
Asbestos	HHW Collection Days	No charge
Medical Waste	WSWMD Convenience Center	Needle collection program only—no charge
Mercury-Added Products	WSWMD Convenience Center & HHW Collection Days	Digital thermometer swap No charge
Dead Animals	Not accepted	—

## 4B. HHW/CEG/Special Waste Planning

WSWMD offers a broad range of collection and education services in regards to household hazardous waste (HHW) and conditionally exempt generator (CEG) waste, and is planning for improvements to the programs as follows.

### Collection

WSWMD offers both on-going collection service for particular materials as well as special collection events for full HHW/CEG waste collection.

**On-going Collection** — On-going collection for the following materials is available at the WSWMD facility in Brattleboro, year-round, during operating hours (8:00-3:30 M-F and 8:00-12:00 Sat.). Fees apply for some materials.

- Mercury-containing devices
- Batteries (rechargeable, button, lithium, and automotive)
- Motor oil and oil filters
- Fluorescent light bulbs and ballasts
- Syringes (Needles)
- Paints (except latex), stains, urethanes, and enamels
- Computers and microwaves

*Assessment:* In fiscal year 2004, the on-going collection program serviced an estimated 2,423 residents and businesses. When added to the participants of the special HHW collection events in November, 8% of the population has been served, up from around 2% before the program was in place. The program is undoubtedly a success. The program does not fully address the problem of latex paint disposal. Also the program could improve its ability to track the materials' origins and participants feedback.

#### *Future Improvements:*

- Within the next few years, the District will research a permanent oil and latex paint collection and recycling program through end-points such as Laurentide, Canada.
- Also, the District will study the feasibility of offering waste latex paint hardener to the public.
- As soon as possible, the District will fully implement a system to track participants, where they come from, how much they bring at a time.
- The District will implement a methodology for increasing public feedback on District programs and the need for any program improvements based on the public's perception of the convenience and types of programs offered. To be implemented at least once during the 5-year term this SWIP is in force.
- Within the next few years, the District will create, distribute and maintain a list of local services stations that accept used motor oil for heating or recycling.
- Within the next few years, the District will create, distribute and maintain a list of locally available outlets for specific universal wastes and other hard-to-manage wastes.
- The District will investigate a feasible way to collect common HHW such as paint or oil at town-run transfer stations. This will be assessed and discussed with member towns at least once during the 5-year term this SWIP is in force.

***Special Collection Events*** — Annually, WSWMD offers HHW/CEG collection events at 4 sites in the District for free collection of HHW for residents, and at direct cost to CEGs. These events are full-service HHW collections serviced by a hazardous waste contractor.

*Assessment and Future Improvements:* The special collection events will continue to be an important and integral part of the District's hazardous waste programs.

## **Education**

The District has an extensive education program that covers hazardous waste issues. The program includes school programs, resident newsletters, and business outreach. Besides the toxicity reduction programs below, please see Attachment E and Section 2J for further details.

***Toxicity Reduction: Residential*** — The District provides residents with alternative low-toxicity recipes for home products through the newsletter and web site. Also, television and radio ads for reduction and proper disposal of household hazardous waste have been produced and aired locally.

*Assessment:* The web site's alternative recipes page is a huge success, and gets more hits than any other page besides our home page. In fact, over 13,000 visits have been made to the page since its inception. The public service announcements have been professionally made and aired relatively frequently, and we assume that they provide some impact toward toxicity reduction.

*Future Improvements:* The District will continue to provide the recipes on the web and information in the quarterly newsletters. Several new public service announcements will be developed and aired over the five-year period of this Plan.

***Toxicity Reduction: Businesses*** — The District provides waste toxicity reduction assistance to businesses (see Section 2E&F for details on recycling services offered), including waste audits and referrals to available services such as:

- The EAD Small Business Compliance Assistance Program (1-800-974-9559).
- Regional hazardous waste contractors.

*Assessment and Future Improvements:* The response to District offers of help have been modest. During the period of this plan, the District will conduct another telephone survey of businesses and institutions in the district to inform them of District services including recycling, waste reduction, and toxicity reduction programs.

***Toxicity Reduction: Schools*** — The District offers an in-school presentation regarding *HHW/Cleaning Products*. Also, the District helps schools during the summers in cleaning out toxics from their facilities and bringing them to the HHW/CEG day in November.

*Assessment:* The *HHW/Cleaning Product* presentation was once popular yet has not been requested frequently as of late. The help to schools for clean-outs is a useful and welcome program. Schools often have a unit focusing on water-quality issues which could be tapped for increasing hazardous waste handling education.

*Future Improvements:* The District will continue to offer the school clean-outs and HHW curriculum. Also,

- Embark on a marketing campaign to encourage schools to request the *HHW/Cleaning Products* program within the term of this Plan.
- Embark on a campaign to have the District do in-school presentations during the water-quality units, during the term of this Plan.
- Inform schools when new programs for hazardous waste are offered by the District (e.g. if a latex paint program becomes a reality).

### **Minimizing the amount of HHW/CEG waste going into trash**

The District plans to implement the following action steps to minimize hazardous or landfill-banned waste being disposed as trash.

- Perform load-checks at the WSWMD transfer station, and pull out material for proper management. Load-checks once per week upon adoption of this SWIP.
- Post signs at WSWMD transfer station waste bins such as “no paint” and “no tires”. Signs to be posted within first two years of this SWIP’s term.
- Monitor member towns’ transfer stations for similar appropriate signage. Suggest new signage to member towns if found lacking. Survey to be done at least once during the 5-year term of this SWIP.

## **Section 5. Unit-Based Pricing Plan for MSW**

### **5A. Evaluation of Current Pricing**

Six MSW disposal options in the District currently charge on a per unit basis, generally between \$1.00 and \$2.50 per bag. Private hauling companies usually charge a monthly fee based on expected volume generation, providing some reduction incentive. And there are five towns which have decided to keep the cost of trash removal on the tax base, two of which (Brattleboro and Winhall) have successful mandatory recycling ordinances.

### **5B. Unit-Based Pricing Action Plan**

The District encourages and supports unit-based pricing, but does not currently exert control over town-run and commercial collection pricing mechanisms. WSWMD’s towns do subsidize the cost of the convenient recycling programs implemented by the District.

The District Board of Supervisors has discussed the possibility of adopting a District-wide unit-based pricing ordinance in 2005 (see Attachment I: District Board Minutes). The Board will consider formulating and adopting a District-wide unit-based pricing ordinance every two years at regularly scheduled Board meetings.

Each of the towns that do not have a unit-based pricing system has visited the issue and each has made an informed decision not to implement unit-based pricing based on the particular

circumstances the town faces. Alternative mechanisms in place for encouraging waste reduction and increasing recycling include:

- Convenient recycling centers located in every District town
- Special waste collection and recycling programs
- An extensive outreach program detailed in Section 2J

In order to monitor unit-based pricing in the District and to encourage it further, the District will:

- Conduct an annual survey of member towns' programs to monitor unit-based pricing;
- Remind member towns annually through their appointed Supervisor that the District continues to encourage unit-based pricing;
- Send a note to haulers in the District annually encouraging the use of unit-based pricing.

## **Section 6. Buy Recycled Plan**

The WSWMD District Clerk is responsible for evaluating purchases for opportunities to “buy recycled.” The District buys recycled and encourages District members to buy recycled in the following ways:

- Using recycled baling wire.
- Using processed glass aggregate (PGA).
- Using recycled wood chips.
- Using paper with over 30% post-consumer recycled content.
- Using other recycled content office supplies such as toilet paper.
- Printing the letterhead on high-content post-consumer recycled paper.
- Promoting buying recycled in literature distributed by the District, including the newsletter.
- Promoting buying recycled during waste audits for businesses or organizations.
- Promoting buying recycled on the web pages.
- Promoting the use of the Vermont state purchasing contracts by member towns and school supervisory unions through word-of-mouth and literature indicating the web addresses.
- Promoting the use of the Vermont state purchasing contracts through publication of the web address in this SWIP:  
<http://www.anr.state.vt.us/dec/wastediv/csc/Cntrcts.htm> or  
<http://www.bgs.state.vt.us/PCA/PURCONT.htm>
- Providing tips on how to buy recycled in the newsletter.
- Providing tips on how to buy recycled during in-school programs.

## Section 7. Illegal Disposal Plan

### 7A. Ordinance and Enforcement

The WSWMD has no illegal disposal ordinance in place and no adoption of such in process. The District Board of Supervisors visited the issue on September 13, 2001, concluding that it would be preferable to provide each town with a model ordinance and allow them to adopt an ordinance if they so choose (see Attachment I: District Board Minutes). The towns of Brattleboro (1994), Jamaica (1973), and Newfane (2001) have illegal disposal ordinances. An illegal disposal ordinance will be re-visited every 2 years by the Board of Supervisors.

### 7B. Strategies to reduce illegal disposal

The following strategies will continue be implemented by the District. Funding of the programs will be provided through District funds if current grants programs are not renewed.

*Site Clean Up* — The District will continue periodic clean up of illegal dump sites at the request of member towns. Additionally, on Green Up Day one or more particular sites are identified and targeted for clean up. Clean up of sites is intended to improve the appearance and livability of the region while also reducing the attractiveness of the site to future dumpers. Posting of sites with signage is considered on a case-by-case basis.

*Burn Barrel Program* — The District currently has a illegal burning program which includes a brochure for distribution, free trash coupons in exchange for a burn barrel, radio public service announcements, and model ordinance distribution. This program will be continued.

*Support of Legislation* — The District will continue to support efforts at the state level to facilitate enforcement of state illegal disposal laws at the local level.

### 7C. Illegal Disposal Education Program

WSWMD's quarterly newsletter, schools programs, and the specific burning brochure, are distributed throughout the District and often speak to illegal disposal issues, the hazards, and the laws (see Attachment E). These programs will continue.

### 7D. Evaluating Convenience

Residents and businesses in the District have a broad range of waste services available to them, including:

- WSWMD recycling centers in each member town;
- WSWMD "convenience center" in Brattleboro for recycling, trash and special wastes;
- 4 large private companies providing curbside and roll-off services;
- 9 smaller private operations providing custom service to more remote towns;
- 2 towns with town-sponsored curbside collection;
- 8 towns with their own transfer station; and
- A WSWMD Eager Beaver trailer for special collections programs.

**Table 10<sup>1</sup>  
Evaluating Convenience**

Town	Furthest haul distances	Days of operation	Convenience Level
Brattleboro	curb – 8 mi.	6 days/wk	High
Brookline	curb – 15 mi.	6 days/wk	Sufficient
Dover	5 mi.	5 days/wk	High
Dummerston	8 mi.	6 days/wk	High
Guilford	curb – 12 mi.	6 days/wk	High
Halifax	curb – 15 mi.	6 days/wk	Sufficient
Jamaica	6 mi.	5 days/wk	High
Marlboro	curb – 16 mi.	6 days/wk	Sufficient
Newfane	curb – 16 mi.	6 days/wk	Sufficient
Putney	curb – 12 mi.	6 days/wk	Sufficient
Readsboro	8 mi.	4 days/wk	Sufficient
Stratton	3 – 32 mi.	3 days/wk	Sufficient
Townshend	6 – 18 mi.	2 days/wk	Sufficient
Vernon	curb – 12 mi.	6 days/wk	High
Whitingham	7 mi.	3 days/wk	High
Wilmington	6 mi.	3 days/wk	High
Winhall	6 – 32 mi.	5 days/wk	Sufficient

1. A detailed worksheet for this table is available as Attachment A.10

## **7E. Strategies to Make Legal Disposal More Convenient and Less Expensive**

After analysis of options open to each member town, the District concludes that the convenience level afforded by the various services is sufficient or better.

## **Section 8. Solid Waste Facility Siting Criteria**

WSWMD has landfill siting criteria from a 1990 special committee created for the purpose. In 1992, the criteria were reiterated in the Windham Regional Commission's (WRC) Solid Waste Plan Summary. The siting criteria and can be found in Attachment F.

## Section 9. Specific Towns Included in the District

### 9A. Towns Included in WSWMD

<b>Table 11</b> <b>Towns Included in the Windham Solid Waste Management District</b>		
Town	Date Accepted into the District	Date Left District
Brattleboro	1988	Remains in District
Brookline	1988	Remains in District
Dover	1992	Remains in District
Dummerston	1988	Remains in District
Guilford	1988	Remains in District
Halifax	1990	Remains in District
Jamaica	1991	Remains in District
Marlboro	1988	Remains in District
Newfane	1991	Remains in District
Putney	1988	Remains in District
Readsboro	1991	Remains in District
Stratton	2001	Remains in District
Townshend	1988	Remains in District
Vernon	1988	Remains in District
Wardsboro	2004	Remains in District
Whitingham	1990	Remains in District
Wilmington	1990	Remains in District
Winhall	2001	Remains in District

### 9B. Process for Reviewing and Accepting New Towns into the District

The procedures for admitting additional towns into the District are described in the District Charter and in the Board of Supervisors motion of June 16, 2001, full copies of which can be found in Attachment G.

*From the WSWMD Charter, April 1996:*

The Board of Supervisors may authorize the inclusion of additional member municipalities in the District upon such terms and conditions as it in its sole discretion shall deem to be fair, reasonable and in the best interests of the District. The legislative branch of any non-member municipality which desires to be admitted to the District shall make application for admission to the Board of Supervisors of the District. The Board

shall determine the effects and impacts which are likely to occur if such municipality is admitted and shall thereafter either grant or deny authority for admission of the petitioning municipality. If the Board grants such authority, it shall also specify any terms and conditions, including but not limited to financial obligations upon which such admission is predicated. The petitioning municipality shall thereafter comply with the approval procedures specified in 24 V.S.A. Chapter 121. If a majority of the voters of the petitioning municipality present and voting at a meeting of such municipality duly warned for such purpose shall vote to approve the Agreement and the terms and conditions for admission, the vote shall be certified by the clerk of that municipality to the Board of Supervisors. Thereafter upon satisfactory performance of the terms and conditions of admission, said municipality shall by resolution of the Board of Supervisors become and thereafter be a member municipality of the District.

*Board of Supervisors motion of June 16, 2001:*

It is the policy of this Board that any consideration for membership in the Windham Solid Waste Management District by any town, collection of towns, or Solid Waste District:

Shall be considered on a case by case basis, with particular attention being paid to avoiding higher than usual collection and/or transportation costs or tonnage that would cause the Windham Solid Waste Management District to exceed a single shift capacity.

Shall require a one-time fee to the District based upon \$18.70 per person and \$28.04 per seasonal unit, hereafter adjusted annually by the CPI.

### **9C. Status of Solid Waste Facilities Located in Towns New to the District**

Solid waste facilities located in towns new to the District are required to forward copies of all relevant permits and certifications to WSWMD. The District Board will review facilities to conclude if they are in compliance with this Solid Waste Implementation Plan (SWIP).

In order to become compliant, the facility must demonstrate that the facility operates or will operate in a manner which helps to achieve the goals of this Plan, that all local and other relevant permits and certifications are in place or actively being pursued, and that, if no current solid waste certification is in place, a certification application has been submitted to the Agency of Natural Resources.

Once deemed in compliance by the District Board, the facility will then be “included in” the SWIP upon acceptance of the town into the District. Table 12 of this Plan will be revised by the Board to include the new solid waste facility(ies) in the SWIP. The District will submit to the ANR a copy of the revised Table 12 along with a statement that the process followed was in conformance with the approved SWIP.

If it is found by the District that a facility is not in compliance with the SWIP, rejected facilities will be informed of deficiencies and required to come into compliance within a reasonable time frame developed by the District or face continued non-inclusion and its consequences.

## **9D. Process for Allowing Towns to Leave the District**

*From the WSWMD Charter, April 1996:*

A member municipality may withdraw from the District upon the terms and conditions specified below:

After District has incurred bonded indebtedness or entered into a long-term contract, a member municipality may vote to withdraw in the same manner as the vote for adoption of the Agreement by such member municipality. It shall be a condition that the withdrawing municipality shall enter into a written agreement with the District whereby such withdrawing municipality shall be obligated to continue to pay its share of the debt incurred by the District for the remaining bonding or contract term. In addition, the withdrawing municipality shall obligate itself to pay the cost of redesigning and rebuilding any facility of the District occasioned because of the reduced volume of solid waste. The cost shall be determined by an independent engineering firm hired by the Board of Supervisors. These additional costs shall be paid either in a lump sum or in installments at such times and in such amounts as required by the Board of Supervisors. In addition, in the event there is a Resource Recovery Facility, if the withdrawal of a municipality will reduce the minimum volume of solid waste required to meet the District's long-term contractual commitments then no withdrawal of a member municipality shall be permitted during the period of such commitments.

## Section 10. Specific Facilities Included in the Plan

### 10A. Facilities Included in the Plan

Table 12: Facilities Included in the Plan				
Facility Name	Owner/Operator	Location	Type	Permit
WSWMD Closed Landfill	WSWMD	Brattleboro	Landfill, Closed	WH080
WSWMD LF Gas Facility	WSWMD	Brattleboro	Other	—
WSWMD MRF & associated operations	WSWMD	Brattleboro	TS & Recycle	WH083
Brattleboro Salvage	Brattleboro Salvage, Inc.	Brattleboro	Transfer Station	WH082
Brattleboro WWTF	Town of Brattleboro	Brattleboro	WWTF	BMP
Specialty Paperboard WWTF	FiberMark, Inc.	Brattleboro	WWTF	BMP
Zaluzny Excavating Corporation	Walter and Steven Zaluzny	Brattleboro	Other	—
Dover Transfer & Recycling Facility	Town of Dover	Dover	TS & Recycle	WH181
North Branch Fire District	Town of Dover	Dover	WWTF	BMP
Dover Closed Landfill	Town of Dover	Dover	Landfill, Closed	—
Halifax Closed Landfill	Town of Halifax	Halifax	Landfill, Closed	WH280
Jamaica Recycling Facility	Town of Jamaica	Jamaica	Recycling	WH110
Jamaica Transfer Facility	Town of Jamaica	Jamaica	Transfer Station	WH301
Newfane Closed Landfill	Town of Newfane	Newfane	Landfill, Closed	WH530
Putney WWTF	Town of Putney	Putney	WWTF	BMP
Putney Paper Co Closed Landfill	Putney Paper, Inc.	Putney	Landfill, Closed	—
Putney Paper Co Paper Sludge Landfill	Putney Paper, Inc.	Putney	Landfill	WH600
Putney Paper Co Treatment Facility	Putney Paper, Inc.	Putney	WWTF	BMP
Readsboro Transfer & Recycling Facility	Town of Readsboro	Readsboro	TS & Recycle	BN612
Readsboro WWTF	Town of Readsboro	Readsboro	WWTF	BMP
Readsboro Closed Landfill	Town of Readsboro	Readsboro	Landfill, Closed	—
Stratton Transfer & Recycling Station	Town of Stratton	Stratton	TS & Recycle	WH960
Winhall-Stratton Fire Dept WWTF	Towns of Winhall and Stratton	Stratton	WWTF	BMP
Townshend Transfer & Recycling Facility	Town of Townshend	Townshend	TS & Recycle	WH421
Townshend Town Grge Periodic HHW site	Town of Townshend/ WSWMD	Townshend	Other	WH160
Vermont Yankee Septage Mgmt Program	Vermont Yankee Nuclear Power Corp	Vernon	WWTF	BMP
Wardsboro Transfer & Recycling Facility	Town of Wardsboro	Wardsboro	TS & Recycle	
Wardsboro Closed Landfill	Town of Wardsboro	Wardsboro	Landfill, Closed	—
Wardsboro Transfer & Recycling Facility	Town of Wardsboro	Wardsboro	TS & Recycle	WH
Whitingham Transfer & Recycling Facility	Town of Whitingham	Whitingham	TS & Recycle	WH092
Jacksonville WWTF	Town of Whitingham	Whitingham	WWTF	BMP
Whitingham WWTF	Town of Whitingham	Whitingham	WWTF	BMP
Whitingham Closed Landfill	Town of Whitingham	Whitingham	Landfill, Closed	WH920
Wilmington Transfer & Recycling Facility	Town of Wilmington	Wilmington	TS & Recycle	WH941
Wilmington WWTF	Town of Wilmington	Wilmington	WWTF	BMP
Wilmington Biosolids Composting Facility	Town of Wilmington	Wilmington	Composting	BMP
Wilmington Hwy Garage Periodic HHW Site	Town of Wilmington/ WSWMD	Wilmington	Other	WH190
Wilmington Closed Landfill	Town of Wilmington	Wilmington	Landfill, Closed	WH940
Winhall Transfer & Recycling Facility	Town of Winhall	Winhall	TS & Recycle	BN961 - BN103

\*BMP means under direction of the DEC's Biosolids Management Program

**Table 12A**  
***Other Facilities within the District Not Required to be Included in the Plan***

Facility Name	Owner/Operator	Location	Type	Permit
<b>Facilities with Categorical Certifications</b>				
Fairground Road Recycle Facility	Brattleboro/WSWMD	Brattleboro	Recycling	WH010
West Brattleboro Recycle Facility	Brattleboro/WSWMD	West Brattleboro	Recycling	WH020
Guilford Recycling Station	Town of Guilford/ WSWMD	Guilford	Recycling	WH070
Marlboro Recycling Station	Town of Marlboro/ WSWMD	Marlboro	Recycling	WH120
Newfane Recycling Station	Town of Newfane/WSWMD	Newfane	Recycling	WH130
Putney Recycling Station	Town of Putney/WSWMD	Putney	Recycling	WH140
Vernon Recycling Station	Town of Vernon/ WSWMD	Vernon	Recycling	WH170
Wilmington Highway Garage Recycle	Town of Wilmington/ WSWMD	Wilmington	Recycling	WH210
Bemis Gravel, Inc. Stump Dump	Bemis Gravel, Inc.	Townshend	Categorical Landfill	WH015
Maple Row Farm, Stump Dump	Maple Row Farm	Putney	Categorical Landfill	WH531
<b>Facilities Exempt from Certification</b>				
Brookline Recycling Station	Town of Brookline/ WSWMD	Brookline	Recycling	WH030*
Dummerston Recycling Station	Town of Dummerston	Dummerston	Recycling	WH060*
Halifax Recycling Station	Town of Halifax/ WSWMD	Halifax	Recycling	WH090*
<b>Land Application Sites for Sludge and Septage</b>				
West Dover site for N. Branch Fire District	Town of Dover	Dover	Land App Site	BMP
Wilmington site for N. Branch Fire District	Town of Wilmington	Wilmington	Land App Site	BMP

\* These exempt sites have ID numbers from a previous categorical certification of April 21, 1997 which are expired, but included here for reference.

“BMP” means under direction of the DEC’s Biosolids Management Program

## **10B. Review for Proposed Facilities**

The state certification process requires that a solid waste facility (with the exception of exempt facilities, categorical certifications, and sludge or septage land application sites) be included in the local or regional SWIP in order to issue certification. Therefore, public or private entities desiring to operate a solid waste facility in the WSWMD shall initiate the review process with the District before or concurrently with application for certification with the Agency of Natural Resources (ANR).

***Wastewater Treatment Facilities (WWTF).*** All biosolids and septage treatment and storage facilities located within the fenced area of a WWTF in the District are considered to be included in the SWIP, with the exception of composting and other Class A treatment facilities that qualify for distribution to the public. Such composting and other Class A treatment facilities must be included in WSWMD’s Plan by using the process specified in this section.

**Review**

Applicants for proposed facilities shall submit a letter to the District requesting inclusion in the District's SWIP along with a completed Vermont ANR solid waste management facility certification application for review. During a publicly warned, regularly scheduled meeting, at which the applicant may make a presentation or be available to answer questions, the District Board of Supervisors will assess if the proposed facility:

1. Meets the facility siting criteria described in Section 8/Attachment F of this SWIP.
2. Operates or will operate in a manner which helps to achieve the goals of this Plan.
3. Has relevant permits and certifications in place or is actively pursuing them in good faith.

**Public Participation**

The proposed facility will be discussed at a publicly warned meeting of the Board of Supervisors, where the public and affected parties are encouraged to attend and participate.

**Approval**

After conditions for positive review have been met, and a public review and discussion of the proposed facility has taken place, the District Board of Supervisors will vote on inclusion of the facility in the SWIP. A majority vote of the Board approves the inclusion of the facility, and Table 12 will be revised to include the new solid waste facility in the SWIP. The District will submit to ANR a copy of the revised Table 12 along with a statement that the process followed was in conformance with the approved SWIP.

## Section 11. Budget and Timeline

A copy of the District's Budget is included in Attachment H.

<b>Table 13 Budget and Timeline</b>			
Action Step	Frequency	Next Scheduled or Complete By	\$ or Personnel
Newsletter	Quarterly	Spring, 2006	Current grant program or District funds. Program Manager.
Reuse facility	Seasonal	Re-opening April 2006	Included in Convenience Center operations budget. Volunteers.
Reuse facility extended operation	In winter	Winter 05-06 or Winter 06-07	Included in Convenience Center operations budget. Volunteers.
Web site swap pages and tracking system	On-going	On-going	Current grant program or District funds. Program Manager.
Recycling drop-off centers and improvements to system	On-going	On-going	\$187,000. Included in MRF Processing section of District budget. Operations Manager.
MRF residuals reduction through composting	On-going	By 2007	Included in MRF Processing section of District budget. Operations Manager.
Campaign to increase seasonal home access to recycling	Once	By 2010	Current grant program or District funds. Program Manager.
Business/institution outreach canvass program	Once +	By 2010	Current grant program or District funds. Program Manager.
Direct recycling service to businesses	On-going	On-going	Included in MRF Processing section of District budget. Operations Manager.
Business co-operative recycling facilitation	Once	By 2010	Current grant program or District funds. Program Manager.
Load checks, convenient recycling, signage, and control of recyclables destination	On-going	On-going	Included in MRF Processing section of District budget. Operations Manager.

*(Table 13 continued on next page)*

**Table 13** (continued from previous page)

Action Step	Frequency	Next Scheduled or Complete By	\$ or Personnel
Discuss mandatory recycling ordinance at Board meeting	Once every 2 years	By 2008	District Manager.
Discuss unit-based pricing ordinance at Board meeting	Once every 2 years	By 2008	District Manager.
Discuss illegal burning ordinance at Board meeting	Once every 2 years	By 2008	District Manager.
Support state C&D recycling efforts.	On-going	On-going	Current grant program or District funds. Program Manager and District Manager.
Support building material reuse business in Brattleboro	As needed	Mostly 2006	Current grant program or District funds. Program Manager and District Manager.
Review C&D fees to see if could encourage higher use	As needed	By 2008	District Manager and Operations Manager
Compost bin sale	Annual	May 2006	Reimbursed by sales revenue. Program Manager and Office Manager.
Coordinating commercial composting program	On-going	On-going	Current grant program or District funds. Program Manager and District Manager.
School visits for commercial composting program	As needed	By 2008	Current grant program or District funds. Program Manager, intern.
Web site educational information updating	On-going	On-going	Current grant program or District funds. Program Manager.
MRF tours for schools and other groups	On-going	On-going	Included in MRF Processing section of District budget. Operations Manager.
School presentations, curriculum, videos, toxicity reduction and technical assistance	On-going	On-going	Current grant program or District funds. Program Manager.
Transfer station operator training	Once every 3 years	By 2008	Current grant program or District funds. Program Manager.

*(Table 13 continued on next page)*

**Table 13** (continued from previous page)

Action Step	Frequency	Next Scheduled or Complete By	\$ or Personnel
Recycling campaign	Once	By 2010	Current grant program or District funds. Program Manager.
HHW/CEG/Special waste collection at Convenience Center	On-going	On-going	Included in MRF Processing section of District budget. Operations Manager.
New HHW/CEG/Special waste programs	As Needed	By 2010	Current grant program or District funds. Program, Operations, and District Manager.
HHW/CEG collections	4 annually	November 4, 2006	Included in Haz Mat Collection section of District budget.
TV and radio ads regarding HHW/CEG/Special waste	As Needed	By 2010	Current grant program or District funds. Program Manager.
Monitor town facilities for systems and signage to reduce recyclables and HHW in trash, and for prices (unit-based?)	Annually	By 2007	Current grant program or District funds. Program Manager and District Manager.
Send a note to haulers encouraging unit-based pricing	Annually	By 2007	Current grant program or District funds. Office Manager and District Manager.
Buy recycled plan	On-going	On-going	Included in MRF Processing section of District budget. Operations Manager and Office Manager.
Illegal dump clean-up	As needed	On-going	Included in MRF Processing section of District budget. Operations Manager.
Illegal burning programs	On-going	On-going	Current grant program or District funds. Program Manager.
Biosolids technical assistance	As requested	—	Current personnel; included in Convenience Center and General & Administrative sections of District budget

## **Section 12. Public Participation Plan**

The public have been, will be, or will continue to be invited to participate in the development of the SWIP in the following ways:

- Public comment is invited and will be accepted at the WSWMD offices during regular business hours throughout the duration of the planning process.
- Public comment was solicited and included in a public participation session during the meeting of the Board of Supervisors in March, 2003.
- A copy of the current draft of the SWIP has been distributed to the Selectboards and appointed Supervisors of each member town. These recipients are the elected representatives of the public, have the duty to look out for public interest, and have the most access to the public as well as waste management policy.
- The SWIP will be made available, discussed, and public input sought at District events including the current series of training seminars for transfer station operators.
- The SWIP and the planning process have been outlined and public comment and participation encouraged on the home page of the web site.
- The SWIP and the planning process have been outlined and public comment and participation encouraged in the quarterly newsletter sent to every mailing address in the District.
- A copy of the current draft of the SWIP is posted on the web site and also available at the WSWMD offices.
- The District distributed Public Service Announcements regarding the SWIP and encouraging public input.
- Two public hearings will be conducted after the Vermont DEC has “pre-approved” the draft submission. These hearings will likely be conducted in Brattleboro and in Wilmington.
- All meetings are posted on the web site and through legal notices in the newspaper.

Public input will continuously be sought on SWIP implementation over the next five years. This program will include:

- Continued presence on the web pages.
- Continued requests for input in the quarterly newsletters.
- Flyers distributed to Selectboards, town clerks, and planning commissions.
- 4 public meetings specifically for SWIP implementation, geographically distributed over the next five years of implementation.

## **Section 13. Conformance with Other Plans**

A letter of conformance to the Windham Regional Commission Plan and a statement of conformance with town plans (with copies of pertinent sections) can be found in Attachment B.

## **Section 14. Attachments**

### **Attachment A: Worksheets**

Attachment A.1	MSW Disposal Estimate
Attachment A.1a	Estimated Diversion Rate
Attachment A.2	Population and Per Capita MSW Disposal Estimate
Attachment A.3	Septage, Biosolids, and other Sludges
Attachment A.6	Pricing and Services
Attachment A.10	Evaluating Convenience

### **Attachment B: Plan Conformance Documentation**

Attachment B.1	Windham Regional Commission Letter of Conformance
Attachment B.2	Town Plan Conformance: Statement of Conformance
Attachment B.3	Town Plan Conformance: Copy of Pertinent Section(s) of Town Plans

### **Attachment C: Solid Waste Ordinances**

Attachment C.1	Brattleboro: Ordinance Regulating the Collection and Disposal of Solid Waste (1993)
Attachment C.2	Dover: Solid Waste Ordinance (1992)
Attachment C.3	Dover: Landfill Ordinance (1987)
Attachment C.4	Halifax: Ordinance Regulating Outdoor Storage of Junk and Junk Vehicles (2001)
Attachment C.4a	Halifax: Waste Disposal Ordinance (1989) and Amendment (1995)
Attachment C.5	Jamaica: Garbage, Rubbish, and Refuse Disposal Regulations (1973)
Attachment C.6	Newfane: Ordinance Regulating Outdoor Storage of Junk and Junk Vehicles (2002)
Attachment C.7	Newfane: Ordinance for the Control of Litter (2001)
Attachment C.8	Townshend: Solid Waste Disposal Ordinance (1978)
Attachment C.9	Whitingham: Disposal Ordinance (1995)
Attachment C.10	Wilmington: Ordinance Regulating the Use of Public and Private Sanitary Sewerage Systems (1985)
Attachment C.11	Wilmington: Landfill Ordinance (1988)
Attachment C.12	Winhall: Civil Ordinance Regulating the Disposal of Solid Wastes (1996)
Attachment C.13	Wardsboro: Solid Waste Disposal Ordinance

### **Attachment D: An Historical Perspective**

### **Attachment E: Summaries of 2003 Outreach and Special Programs**

### **Attachment F: Landfill Siting Criteria**

### **Attachment G: District Charter and Board Motion**

### **Attachment H: District Budget**

### **Attachment I: District Board Minutes**

# **Attachment A**

## **Worksheets**

- Attachment A.1 MSW Disposal Estimate**
- Attachment A.1a Estimated Diversion Rate**
- Attachment A.2 Population and Per Capita MSW Disposal Estimate**
- Attachment A.3 Septage, Biosolids, and other Sludges**
- Attachment A.6 Pricing and Services**
- Attachment A.10 Evaluating Convenience**



## **Attachment B.2**

### **Statement of Conformance**

The Windham Solid Waste Management District has reviewed the Town Plan for each member municipality and has concluded that this Solid Waste Implementation Plan conforms with every Town Plan.

## **Attachment B.3**

### **Town Plans**

Pertinent sections of each Town Plan are included in Attachment B.3.

## **Attachment C**

### **Solid Waste Ordinances**

Attachment C.1	Brattleboro: Ordinance Regulating the Collection and Disposal of Solid Waste (1993)
Attachment C.2	Dover: Solid Waste Ordinance (1992)
Attachment C.3	Dover: Landfill Ordinance (1987)
Attachment C.4	Halifax: Ordinance Regulating Outdoor Storage of Junk and Junk Vehicles (2001)
Attachment C.4a	Halifax: Waste Disposal Ordinance (1989)
Attachment C.5	Jamaica: Garbage, Rubbish, and Refuse Disposal Regulations (1973)
Attachment C.6	Newfane: Ordinance Regulating Outdoor Storage of Junk and Junk Vehicles (2002)
Attachment C.7	Newfane: Ordinance for the Control of Litter (2001)
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Attachment C.11	Wilmington: Landfill Ordinance (1988)
Attachment C.12	Winhall: Civil Ordinance Regulating the Disposal of Solid Wastes (1996)
Attachment C.13	Wardsboro: Solid Waste Disposal Ordinance (1987)

# **Attachment D**

## **An Historical Perspective**

### **Windham Solid Waste Management District Formation**

The Windham Solid Waste Management District was formed in 1987 to collectively provide for the efficient, economical, and environmentally sound management of solid waste generated within its member municipalities. Under Vermont law, 24 V.S.A. Chapter 121, Subchapter 3, eight initial towns formed a union municipal district, similar in concept to a union school district, allowing for cooperative solid waste management. WSWMD has the powers of a municipal corporation under the laws of Vermont consistent with the purpose and charter of the District. Since its inception, WSWMD has grown to include 18 member municipalities in 2005.

### **Powers and Authority**

Control over the District remains with elected officials and citizens in each member municipality. Citizens within WSWMD have the power to petition for District-wide meetings at any time. Oversight of WSWMD resides with its Board of Supervisors. This Board consists of one representative and one alternate representative from each of the member municipalities appointed by each town's Selectboard. Supervisors are entitled to cast one vote for every 3,000 population, or part thereof, in the municipality which he or she represents. As former host community, the Town of Brattleboro also retains one (1) host community vote. Currently, Brattleboro has five (5) votes and each other municipality has one (1) vote, for a total of 22 votes.

The Board of Supervisors conducts an annual public hearing in December to present and discuss the District budget. Once an approved budget is finalized by the Board, the member towns are assessed on a per capita basis using state and federal census data. Long-term indebtedness must be approved by a majority of voters of the District, with ballots from each municipality being commingled before being counted.

### **Selection of a Comprehensive Solid Waste Management System**

Prior to the adoption of the original District Plan in January 1992, WSWMD spent significant efforts identifying a preferred comprehensive solid waste management system to be implemented within the region. Since the infrastructure which existed at that time consisted primarily of local unlined landfills that were due to close, the timing for the implementation of a new, integrated solid waste management system was fortuitous. The only pre-existing component was the myriad of private haulers who collected and transported wastes from the residents, businesses, and institutions located within the District. The process undertaken to identify the solid waste management system to be implemented by WSWMD consisted of an analysis of alternative systems utilizing an extensive public process. The proposed alternative that was selected included a Materials Recovery Facility (MRF), regional HHW facility, regional compost area, and a new regional sanitary landfill (in 1995 the landfill siting process which had begun in 1990 was ended by a vote of District Board, currently there are no plans to build a new landfill).

The present system of waste management consists of a MRF, full time paint drop-off and universal waste program, private regional transfer station, and rural recycling drop-off. All solid waste collected within the District is disposed of outside the District.

## Closed Landfills

The passage of Vermont's Act 78 in 1987, as well as federal regulations developed by the EPA (40 CFR Parts 257 and 258), required the closing of unlined landfills. The following District towns have closed landfills:

Brattleboro	Newfane	Whitingham
Dover	Readsboro	Wilmington
Halifax	Putney (Putney Paper Co)	

## Regional Landfill

A closed landfill exists adjacent to the WSWMD MRF on Old Ferry Road in Brattleboro. The unlined landfill had been accepting waste for decades before WSWMD assumed operation in 1988. In 1989, the District purchased the landfill from the Town of Brattleboro. The landfill was closed in 1995 and subsequently capped. A methane gas collection system and adjoining electricity generation program are in place. Responsibility for post-closure activities resides with the District.

## A Brief Chronology of WSWMD Milestones

A brief chronology of key events in the history of the District is summarized as follows:

1988 May	Eight-town District chartered by Vermont Legislature (Brattleboro, Brookline, Dummerston, Guilford, Marlboro, Putney, Townshend, Vernon)
1988	District assumes operation of Brattleboro landfill facility and methane collection/ electricity generation system
1989	District purchases landfill from Town of Brattleboro
1989	District residents vote to approve \$1 Million district bond issue for construction of Material Recycling Facility
1989	Formed Oversight Committee and hired Consultant for Analysis of Options
1990	Whitingham, Halifax and Wilmington join District (total membership 11 towns)
1990	Collection igloos for glass, cans and newspaper recycling program are installed in all eleven District towns; materials are collected by the District and transported to established end markets.
1990	District receives three-year extension (Vermont Senate Bill 322) for operation of landfill past required July, 1992 closure of all unlined landfill facilities.
1990	In cooperation with Windham Regional Commission, landfill siting criteria are established for screening approximately 235,000 acres of District land for new landfill facility and Stage 1 of the siting process is begun.
1991	Readsboro and Jamaica join the District (total membership 13 towns)
1991	Stage 1 of landfill siting process is completed, eliminating 201,100 acres of unsuitable District land, Stage II is begun.
1991 Nov	Analysis of Options, Phase II (metals) completed
1992	Dover and Newfane join District (total membership 15 towns)
1992	Stage II of the landfill siting process is completed. Identification of three potential sites
1993 Feb	Board of Supervisors approve the Windham Solid Waste Management District Solid Waste Implementation Plan
1993 July	District receives its Act 250 Permit for construction of the Material Recovery Facility

1993 July	District receives permits from the Town of Brattleboro for its Planned Unit Development which includes the proposed Material Recovery Facility, Pole Barn, Hazardous Waste Depot and Transfer Station
1994 Jan	WSWMD receives Interim Certification for its Material Recycling Facility
1994 Feb	WSWMD relocates administrative offices to new MRF facility on Old Ferry Road
1994 July	Grand opening of WSWMD's Material Recycling Facility
1995 May	Approval of Amendment to WSWMD's Solid Waste Plan
1995 Sept	WSWMD votes not to pursue landfill siting in Dummerston
1995 Oct	WSWMD converts from igloo collection to commingled collection boxes
1995 Oct	WSWMD closes its unlined landfill
1995 Nov	Board votes to pursue establishing Swap Shop
1996 March	WSWMD assumes textile recycling
1996 March	Board of Supervisors adopts District Guidelines
1996 April	WSWMD Charter Amended April 30, 1996
1997 Feb	WSWMD assumes full operation of MRF
1997 Sept	WSWMD publishes the first Battery Sort Guide
1999 Oct	WSWMD awarded USDA Grant for public education programs
2000 March	WSWMD initiates mercury thermometer exchange program
2000 Sept	Computer Recycling and Reuse Pilot Collection
2000 Oct	New Swap Shop Grand Opening
2000 Oct	Video premier of Buy and Bye: the rest of the cycle
2001 March	End of Life Computer Management Grant
2001 June	Winhall joins the District (total membership 16 towns)
2001 June	Permanent Electronics Recycling Program
2001 Sept	Permanent Paint Collection Program
2001 Sept	Stratton joins the District (total membership 17)
2001 Dec	Gavin Gas Corporation donates gas collection system
2002 March	Sharps collection program
2002 Nov	New brochure Disposal Tips for Home Health Care Products
2005	Wardsboro joins the District (total membership 18)

### **WSWMD Today**

Current WSWMD membership consists of the following 17 municipalities in Windham (W) and Bennington (B) Counties:

Brattleboro (W)	Halifax (W)	Readsboro (B)	Wardsboro (W)
Brookline (W)	Jamaica (W)	Stratton (W)	Whitingham (W)
Dover (W)	Marlboro (W)	Townshend (W)	Wilmington (W)
Dummerston (W)	Newfane (W)	Vernon (W)	Winhall (B)
Guilford (W)	Putney (W)		

The population is concentrated in and around the Town of Brattleboro in southeastern Vermont. WSWMD currently serves an estimated population of 33,323 residing in approximately 13,885 households (Census 2000).

## **Attachment E**

### **Summaries of 2003 Outreach and Special Programs**

**Attachment F**  
**Landfill Siting Criteria**

## **Attachment G**

### **District Charter and Board Motion**

**Attachment H**

**District Budget**

**Attachment I**  
**District Board Minutes**