

INTRODUCTORY INSTRUCTIONS

Purpose of the District Solid Waste Management Plan Format

Ohio Revised Code (ORC) Section 3734.53 requires that "...the solid waste management plan of any county or joint solid waste management district shall be prepared in a format prescribed by the Director of Environmental Protection..." Ohio EPA has issued this document, the *District Solid Waste Management Plan Format, version 4.0* (Format 4.0), as that prescribed format. Format 4.0 represents the third revision of the District Solid Waste Management Plan Format. Format 4.0 replaces version 3.0 which was issued in 1996.

Format 4.0, incorporates the goals of the *2009 State Solid Waste Management Plan* into local solid waste planning efforts.

Through Format 4.0, Ohio EPA made a number of structural and technical changes to the way solid waste management plans will be prepared. These changes are meant to do all of the following:

- Make the plan more readable;
- Simplify writing plan;
- Eliminate redundancy/combine all like information together;
- Eliminate unnecessary information;
- Improve the solid waste management plan as a planning tool; and
- Provide the policy committee with some flexibility when completing the plan.

Requirement to use Format 4.0

All policy committees that begin preparing their solid waste management plans after the effective date OAC Rule 3745-27-90 are required to use the Format 4.0.

Goals of the 2009 State Solid Waste Management Plan

SWMDs are required to provide programs that will achieve the goals established in the *2009 State Solid Waste Management Plan* (2009 State Plan). A SWMD's solid waste management plan must describe these programs and demonstrate that the programs are adequate to achieve the goals.

The 2009 State Plan established nine goals. A SWMD's solid waste management plan will provide demonstrations for up to eight of those goals. The eighth goal, market development, is optional. The ninth goal requires submitting annual reports to Ohio EPA, and no demonstration of achieving that goal is needed for the solid waste management plan.

SWMDs are required to demonstrate achieving either Goal 1 or Goal 2, but are encouraged to achieve both goals. The solid waste management plan must clearly identify if the SWMD will achieve Goal 1, Goal 2, or both.

Overview of the Format 4.0

The body of the plan will consist of six chapters of easy-to-read text, summary tables, and figures. These six chapters will provide a snapshot of technical information, such as projections, calculations, and detailed analyses that will be provided in a series of appendices. The policy committee will complete the appendices first.

Body of the Plan

The body of the plan will consist of the following six chapters:

- Chapter 1 – Introduction
- Chapter 2 – District Profile
- Chapter 3 – Waste Generation
- Chapter 4 – Waste Management
- Chapter 5 – Programs
- Chapter 6 – Cost and Financing of Plan Implementation

Ohio EPA prepared Chapter 1 to be standard for all solid waste management plans. The intent is for the policy committee to include Chapter 1 as written by Ohio EPA. The only exception is section C (SWMD Plan History). Each policy committee will alter this section to make it specific to the SWMD.

Chapters 2 through 6 all begin with standard purpose statements. These statements provide context for the information in the chapter to readers. Ohio EPA prepared these statements, and the statements are included in the instructions. The policy committee will keep these statements in the SWMD's plan. The policy committee may choose to alter the statements and/or add information to the standard statements. However, Ohio EPA encourages the policy committee to keep as much of the standard statement as possible so as not to change the message conveyed.

The instructions for each chapter establish the structure of the chapter and provide prompts regarding appropriate information to include. More than likely, not all plans will include information to address all of these prompts. Furthermore, the policy committee is encouraged to provide any other information it feels is needed to fully describe the SWMD.

The policy committee will fill in the information specific to its SWMD. The policy committee will have some flexibility regarding the information it will provide in each of the six chapters. The idea is that the policy committee will convey the information it believes to be the most important in those chapters. In this way, the policy committee can tailor the body of the plan to meet the needs of its local constituents.

Appendices

The appendices will contain the technical data and information for the plan. The appendices will also contain the policy committee's demonstrations for achieving the goals of the 2009 State Plan, having access to adequate solid waste facilities, having adequate revenue to cover planned expenditures, etc. The policy committee will complete these appendices before writing the six chapters.

Interrelationship of Appendices - The policy committee will present reference year data and planning period projections in a series of appendices. Thus, population data will be in Appendix C, residential/commercial waste recycling data will be in Appendix E, waste generation data will be in Appendix G, and diversion rates will be in Appendix K. Calculations in one appendix may use data from another appendix or appendices (e.g. generation data in Appendix G uses disposal data from Appendix D and recycling data from Appendices E and F). As a result, making changes to data in one appendix will require making changes in other appendices.

While preparing its solid waste management plan update, the policy committee will perform a strategic program evaluation designed to identify outstanding program needs and help the SWMD establish priorities for the planning period. The strategic evaluation consists of a number of "needs" assessments. Each policy committee will, among other things, assess the SWMD's existing recycling infrastructure, current diversion rate, recovery of high volume materials, service coverage for all sectors of waste generators, education and outreach efforts, programs to address hard to manage and restricted waste streams, etc. The policy committee will use the results of this evaluation to develop new programs or changes to existing programs to address identified needs and priorities.

Before performing the program evaluation, the policy committee will enter reference year data in the appropriate appendices. The policy committee will use that reference year data in many of its analyses. However, a policy committee cannot make projections for most statistics without first determining what programs the SWMD will provide during the planning period.

The policy committee will likely revisit most appendices several times before completing those appendices. For example, once a policy committee decides on the programs the SWMD will provide, the policy committee will then calculate how much diversion can be expected as a result of those programs and develop projections in the appropriate appendices. In addition to recycling statistics, the amount of diversion will influence disposal projections. Based on those projections, the SWMD will then calculate its diversion rates. Based on the results, the SWMD may need to revisit its portfolio of programs to determine ways to stimulate even more diversion.

As a result, while the finalized reference year data will remain consistent throughout the entire process, some of the appendices will evolve over the course of preparing the plan.

Instructions for Appendices - The instructions for the appendices are prescriptive. Ohio EPA expects the policy committee to provide the required data and information according to the structure established in the instructions. This will facilitate Ohio EPA's review of the completed plan. The instructions for an appendix:

- lay out the structure for the appendix
- provide templates for required tables
- explain how to complete the tables
- prescribe the information and data to be included
- provide formulas and explain how to do calculations
- describe methodologies for evaluating baseline information and developing projections
- establish an evaluation process for making decisions about what programs the SWMD will provide
- explain what text to include, etc.

Audiences

The intended audiences for Chapters 1 through 6 of the plan are the general public and community leaders. The chapters will function as an executive summary. As such, the chapters will provide the basic information that people reading the plan need to know to understand the SWMD and how the SWMD will operate during the upcoming planning period. These chapters should also give community leaders who have to decide whether to ratify the plan the information they need to make their decisions.

Ohio EPA is the intended audience for the appendices. The appendices will provide the data, information, and analyses Ohio EPA needs to review a plan and make a decision regarding the approvability of a plan. Thus, the appendices will be much more technical in nature and can be written with that in mind.

Contents of appendices in the Format 4.0 vs. a solid waste management plan

Ohio EPA tried to be consistent with the numbering and contents of appendices between the Format 4.0 and the solid waste management plan. However, for some appendices, the solid waste management plan will contain different information than the appendices in the Format 4.0. As an example, Appendix S in the Format 4.0 provides a description of social marketing. Appendix S in the solid waste management plan will contain the SWMD's siting strategy.

See Attachment 1 at the end of these instructions for a list of the appendices as they will appear in the solid waste management plan

Instructions and Examples

Format 4.0 provides two versions of several of the chapters and appendices. One version provides detailed instructions that explain how the policy committee will complete each portion of the plan. The policy committee will remove these instructions for its solid waste management plan. In place of the instructions, the policy committee will provide original text.

In addition, Format 4.0 provides examples of completed tables and sample text for several of the chapters and appendices. Ohio EPA included these examples to illustrate the types of information that may be included. These examples are not the “gold standard” for what an individual policy committee will provide in its solid waste management plan. The examples are intended to be guidelines for potential information to include and ideas for how to present information. A policy committee’s plan may contain more or less or even different information for certain portions depending upon the specifics of the SWMD.

Ohio EPA encourages the policy committee to contact the DMWM planner assigned to the SWMD prior to completing a chapter to discuss how to create the chapter. The planner can help the policy committee determine what and how much information to provide in the chapter and can help the policy committee adapt the chapter to best meet the needs of the SWMD’s constituents.

The policy committee is encouraged to supplement the information prescribed in Format 4.0 with whatever additional information the policy committee believes will improve its plan.

Instructions versus working versions of the chapters and appendices

Ohio EPA has provided working versions of the chapters and appendices that the policy committee will use to complete its solid waste management plan. These working versions do not contain instructions, examples, or table structures. The working versions do retain purpose statements that the policy committee will include in its solid waste management plan. The working versions also have the organizational headings and placeholders that indicate where the policy committee will insert tables and text. The policy committee will need to delete the placeholders as it inserts information.

The policy committee will refer to the instructions while entering information into the working versions and the workbook.

Entering Data

The Word version of the format shows the structures of all tables that the policy committee will complete. However, the policy committee will not enter information into those tables. Instead, Ohio EPA created a Microsoft Excel workbook that the policy committee will use to enter data, develop projections, and generate tables for the solid waste management plan, both the main chapters and the appendices. The workbook contains a dedicated worksheet for each table prescribed by the Format 4.0.

The document preparer will complete each table using the worksheet for that table (i.e. the table will be completed outside of the Word document). After completing the table in the worksheet, the preparer will copy the table from the worksheet and paste it into the solid waste management plan.

The tabs for the worksheets are color coded. Each appendix has its own color and all spreadsheets associated with a specific appendix are the same color. Ohio EPA also created detailed instructions specific to completing each table/spreadsheet. The workbook and instructions do all of the following:

- Prepopulate cells with embedded formulas that will automatically complete MOST calculations;
- Link related worksheets. After the user enters data the first time, that data is automatically carried to each worksheet that uses that data (such as the years in the planning period). This will:
 - Reduce the number of times a SWMD has to enter the same information into different tables;
 - Reduce data-entry errors; and
 - Simplify the process of entering data.
- Generate complete tables for the appendices and summary tables for the chapters; and
- Generate charts and graphs that can assist with analysis and be used in the solid waste management plan.

Ohio EPA compiled some tips for using Excel. These tips provide basic instructions for using Excel and manipulating the worksheets. One of the tips concerns what to do with extra rows and columns in tables. Manipulating the worksheets can invalidate embedded formulas and links. Therefore, it is best not to delete rows and columns. Instead, Ohio EPA recommends hiding unneeded rows and columns before copying and pasting the tables. The “Tips for Using Excel” explain how to hide rows and columns.

There are blank worksheets for each appendix. The policy committee is meant to use them to provide supplemental data, perform manual calculations, manipulate data, etc. separate from the prescribed worksheets. Ohio EPA encourages the policy committee to use these worksheets instead of adding to or altering Ohio EPA’s worksheets. Furthermore, the policy committee will submit its workbook to Ohio EPA along with the solid waste management plan. Showing all work may help Ohio EPA understand how the policy committee derived figures which may also reduce the number of comments Ohio EPA provides in its non-binding advisory opinion.

Summary of the process for preparing the solid waste management plan

The policy committee will follow a few basic steps while preparing its solid waste management plan:

- Enter reference year information in all relevant appendices and spreadsheets;
- Conduct analyses in Appendix H;
- Use results from analyses to draw conclusions, make decisions about the programs the SWMD will provide during the planning period, and describe those programs (Appendix I);

- Complete the workbook. This will involve making projections for the planning period based on the policy committee’s conclusions and decisions from Appendix I;
 - Complete all appendices, including copying and pasting tables and charts into the appendices; and
 - Write chapters and copy and paste tables and charts into the chapters.
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Supplemental Executive Summary

The Format 4.0 does not direct the policy committee to prepare an executive summary. The six chapters will provide the information that would otherwise appear in an executive summary. However, some policy committees may choose to prepare a condensed version of Chapters 1 – 6 as a standalone executive summary or a “fact sheet”. The policy committee could then make that document available as a supplement to the plan.

Plan Certifications

During the process of preparing a plan, the policy committee signs three official documents certifying the plan. Appendix Q contains templates for these three documents. These documents are as follows:

1. *Certification Statement for the Draft Solid Waste Management Plan* –The District’s policy committee signs this statement to certify that the information presented in the draft solid waste management plan submitted to Ohio EPA is accurate and complies with the Format 4.0.
2. *Resolution Adopting the Solid Waste Management Plan* (adopted prior to distributing the draft plan for ratification) – The District’s policy committee signs this resolution to accomplish two purposes:
 - Adopt the draft solid waste management plan
 - Certify that the information in the solid waste management plan is accurate and complies with the Format 4.0.

The policy committee signs this resolution after considering comments received during the public hearing/public comment period and prior to submitting the solid waste management plan to political jurisdictions for ratification. The policy committee should not make any changes to the solid waste management plan after signing the resolution.

3. *Resolution Certifying Ratification of the Solid Waste Management Plan* – The Districts policy committee signs this resolution to certify that the solid waste management plan was ratified properly by the political jurisdictions within the solid waste management district. The policy committee signs this resolution after the

solid waste management plan is ratified and before submitting the ratified plan to Ohio EPA)

The table below lists the three documents, describes when each document is executed, and indicates which version of the plan, the draft or the ratified version, the SWMD includes each document:

Document	When Executed	Include in Draft Plan	Include in Ratified Plan
Certification Statement for the Draft Solid Waste Management Plan	Signed and dated prior to submitting the draft plan to Ohio EPA for review	Yes	Yes
Resolution Adopting the Solid Waste Management Plan	adopted prior to distributing the draft plan for ratification	No	Yes
Resolution Certifying Ratification of the Solid Waste Management Plan	adopted following the ratification period and before submitting the ratified plan to Ohio EPA	No	Yes

Use of policy committee, board of directors, and policy committee

Use of policy committee vs. board of trustees

The format uses policy committee when referring to the body that is responsible for preparing the solid waste management plan. For a regional solid waste management authority, it is the board of trustees that has the responsibility of preparing the solid waste management plan. Therefore, references to policy committee should be interpreted as referring to both the policy committee and the board of trustees.

Use of board of county commissioners vs. board of directors vs. board of trustees

The board of directors/board of county commissioners/board of trustees is responsible for implementing the policy committee’s solid waste management plan. The format uses board of directors to mean a board of county commissioners, board of directors, and a board of trustees.

Use of policy committee vs. SWMD

At times, the format uses policy committee and SWMD interchangeably when referring to the body that is responsible for preparing the solid waste management plan. It is the policy committee/board of trustees that is responsible for preparing the plan and making decisions regarding how the SWMD will operate during the planning period.

Ohio EPA's Review

When Ohio EPA reviews a draft solid waste management plan, the Agency focuses on the following:

- Does the solid waste management plan demonstrate that the SWMD will achieve all of the goals of the state solid waste management plan?
- Does the solid waste management plan meet the requirements established in the Ohio Revised Code?
- Does the solid waste management plan conform to the current version of the District Solid Waste Management Plan Format?
- Does the solid waste management plan demonstrate that the SWMD will be financially solvent for the entire planning period?
- Does the solid waste management plan make sense?
 - Clearly explain what the SWMD will do;
 - Provide commitments versus vagueness (i.e. is the plan well thought out or is it a plan to plan?); and
 - Have a clear plan of action for big ticket items (such as facilities).
- Is the solid waste management plan legal?
- Is the solid waste management plan internally consistent?
- Does the solid waste management plan contain data that conflicts with data previously reported to Ohio EPA.

In the non-binding advisory opinion, Ohio EPA comments on any of the items above. Ohio EPA also provides suggestions for ways the policy committee can clarify language in the plan to make it more readable and to provide comprehensive information.

Glossary

Ohio EPA encourages the policy committee to include a glossary of terms in the solid waste management plan. The policy committee can use Ohio EPA's definitions from Appendix X, create its own definitions, or use some combination of the two.

List of Acronyms

Ohio EPA encourages the policy committee to define all acronyms used in the solid waste management plan by providing a list of acronyms.

Demonstration of Achieving Goal 2

A new concept introduced with Format 4.0 concerns how a SWMD demonstrates achieving Goal 2 of the 2009 State Plan (the percentage goal). A SWMD that pursues Goal 2 is required to demonstrate that it either met Goal 2 in the reference year or will meet Goal 2 within the first three years of the planning period. However, Ohio EPA understands that it is difficult for a SWMD to obtain reliable, quantifiable data for all of

the SWMD's programs. Thus, the Format 4.0 establishes a structure SWMDs will use to demonstrate achieving Goal 2 that takes data issues into account. Overall, the Format 4.0 will place more emphasis on the activities and programs a SWMD commits to and less emphasis on quantifying the effects of each and every activity or program. In essence, the SWMD will demonstrate that its projections for material to be recovered are justified based on a combination of the data the SWMD collects, the effort the SWMD puts into evaluating its existing situation, and the programs the SWMD commits to implementing to effect projected recovery.

Ohio EPA understands that the results of some programs are not easily quantifiable. The Format 4.0 gives the SWMD some flexibility for developing projections to allow the SWMD more time to evaluate the impact of its programs and activities. Thus, Ohio EPA will consider the totality of everything the SWMD commits to doing to recover material and collect data to quantify that recovery.

If a SWMD believes that it can achieve Goal 2 during the planning period but does not have sufficient data to make the demonstration with confidence, the SWMD may do the following:

1. Develop projections for programs where data is available;
2. Base those projections directly on the programs the SWMD will implement rather than on arbitrary increases;
3. Perform a program evaluation and analysis aligned with Appendix H;
4. Provide an outreach and marketing plan as prescribed by the 2009 State Plan;
5. Developing and implement a detailed data collection and evaluation strategy (see Appendix R); and

The activities listed above can help a SWMD overcome the lack of data (or questionable data) and justify the SWMD's demonstration of achieving Goal 2.

1. Develop projections for programs where data is available

It is easier to attribute quantities to some programs than others. Recovery projections will result from a combination of quantifiable recovery plus programs that are not easily quantifiable but that have been proven to contribute to increased recovery over time.

Recovery through programs such as curbside recycling programs, drop-off recycling sites, yard waste collection programs, household hazardous waste collection programs, electronics collection programs, etc. can be quantified. This is true whether or not the SWMD historically provided the program. A SWMD that had quantifiable programs in the reference year (or earlier) will develop projections for recovery based on those programs. If the SWMD lacks data for a program or will implement a new program during the planning period, then the SWMD will use data from equivalent programs in other SWMDs or from Ohio EPA to make projections. For example, A SWMD that is implementing a new non-subscription curbside program could project recovery using an

average per capita recovery rate for similar non-subscription curbside recycling programs available in other SWMDs.

It isn't possible to project quantities to be recovered through programs such as upgraded webpages and many outreach/education programs. In the long run, those programs can result in increased recovery. As long as the SWMD is not relying solely on non-quantifiable programs to demonstrate achieving increases in its recovery rate, then the SWMD can attribute some reasonable level of increases above those projected for quantifiable programs.

- 2. Base projections directly on the programs the SWMD will implement rather than on arbitrary increases*

Ohio EPA expects the SWMD to put forth its best effort to project the quantities that can reasonably be expected to be recovered based on the programs to be provided. In the past, some SWMDs have applied an arbitrary increase to project quantities to be recovered (e.g. one percent per year). SWMDs opting to achieve Goal 2 must correlate projections with the programs and activities the SWMD will implement during the planning period. Projections must be based on justifiable data or a reasonable rationale, such as historical increases in similar programs, program expansions, etc.

- 3. Perform a program evaluation and analysis aligned with Appendix H*

Appendix H contains extensive instructions for completing a strategic evaluation of existing reduction and recycling efforts. The evaluation involves assessing the SWMD's programs in the context of factors that need to be considered when developing recycling and waste reduction programs. The SWMD will use the results of the evaluation to make decisions regarding the programs the SWMD will provide during the upcoming planning period. While reviewing a solid waste management plan, Ohio EPA will look at the SWMD's overall effort to complete the recommended analyses and how the SWMD used the results to make decisions about its programs.

- 4. Provide an outreach and marketing plan as prescribed by the 2009 State Plan*

In accordance with the 2009 State Plan and Appendix L, each SWMD will develop and implement an outreach and marketing plan. This outreach and marketing plan will use social marketing strategies to encourage more people to recycle. The outreach and marketing plan is the SWMD's strategy for increasing participation in available recycling programs and recovery through those programs. While the results of many social marketing strategies are difficult to quantify, such strategies can improve recovery if implemented properly.

As with the program analysis described above, Ohio EPA will be looking for solid waste management plans that demonstrate the SWMD made a good faith effort to develop an outreach and marketing plan in accordance with the instructions in Appendix L.

5. *Develop and implement a data collection & program evaluation strategy*

Each SWMD, regardless whether the SWMD has opted to achieve Goal 1 or Goal 2, must demonstrate making progress toward meeting the recycling rates established in Goal 2. In future state solid waste management plans, Goal 2 will likely become the primary goal SWMDs must achieve. Therefore, sooner or later all SWMDs are going to need to obtain good data.

If one of the reasons a SWMD is unable to demonstrate meeting Goal 2 is a lack of data, then the SWMD may be able to justify increasing its recycling rate by committing to improving its data collection and program evaluation efforts during the planning period. This will give the SWMD a full planning cycle to become more effective at collecting data to learn more about program impacts. Doing so will the SWMD develop better projections for its next solid waste management plan update.

Summary

SWMDs and Ohio EPA need accurate data about the impact of programs on diverting material from disposal in landfills and the overall impact of SWMDs efforts. SWMDs need accurate data in order to make effective decisions about programs at the local level. Ohio EPA needs accurate data to make effective policy decisions at the state level. In some instances this data is readily available. In other instances collecting data on program results is challenging due to a variety of factors. Ohio EPA recognizes that not all SWMDs currently have comprehensive, accurate data available. Ohio EPA further recognizes that SWMDs have to invest considerable time and effort to gather and analyze data.

Ultimately, the primary objective of all SWMD programs is to divert materials from landfills. Goal 2 of the 2009 State Plan reflects this objective. Regardless of whether a SWMD opts to pursue Goal 1 or Goal 2, the SWMD needs an accurate measurement of diversion from landfills. Ohio EPA will continue to focus on the quantifiable results of SWMD programs.

However, in an effort to balance the need for accurate data with the limited resources available to many SWMDs, Ohio EPA has developed an approach to achieving Goal 2 that takes into account more than just data. This approach recognizes a SWMD's overall efforts to implement programs, complete all the elements of the Format 4.0, provide outreach and education, and improve data collection. If a SWMD can demonstrate these comprehensive and good faith efforts, then Ohio EPA will focus on the programmatic portions of meeting the goals and reduce its scrutiny of the data. This will provide a SWMD with a full planning cycle to improve data quality and collection efforts.

Projections

The statute requires that solid waste management plans provide projections for the entire planning period covered by the plan. To comply with the statute, the solid waste management plan needs to show data for the entire planning period. However, Ohio EPA understands that projections become questionable after the first few years of the planning period. Therefore, under most circumstances, Ohio EPA recommends that the policy committee develop projections for the first four years (for a ten year planning period) or first six years (for a 15 year planning period) of the planning period. Beginning in the fifth or seventh year, the policy committee would hold quantities constant.

The tables in the appendices will show data for the entire planning period. The summary tables in the chapters will show data for the first four or six years of the planning period.

Ohio EPA encourages the policy committee to look beyond the first six years to identify any significant issues that the SWMD needs to plan for. Examples include landfills closing and adequacy of funding/operating close to the financial margin. If any of those issues are likely, then the policy committee should address the issues in its solid waste management plan.

Material Change in Circumstances

Ohio Revised Code Section 3734.56(D) authorizes the board of directors to request the policy committee to begin updating a solid waste management plan prior to the required date if the board determines that circumstances materially changed from those addressed in the approved plan. The solid waste management plan does not have to lay out a material change of circumstances procedure in order for a SWMD to act on that authority.

Unlike past versions, version 4.0 of the District Solid Waste Management Plan Format does not require the policy committee to provide a material change in circumstances procedure in its solid waste management plan. This does not prevent the policy committee from choosing to include a procedure in the solid waste management plan. At a minimum, Ohio EPA encourages the SWMD to develop and document a material change in circumstances procedure for internal use regardless of whether the policy committee includes that procedure in the plan.

The following are things to consider for a material change in circumstances procedure:

- What criteria will be evaluated?
- What are the triggers for those criteria? (e.g. how much of a decrease in revenue would need to occur before the SWMD would become concerned about its ability to fund its plan?)
- How will the SWMD monitor the criteria?

- Who will be responsible for doing the monitoring?
- Who will be responsible for determining that a material change in circumstances has occurred?
- What is the notification procedure?
- What is the timetable for the procedure?

Even if the policy committee does not include a full material change in circumstances procedure in the solid waste management plan, Ohio EPA strongly recommends that the policy committee define circumstances that could necessitate updating the solid waste management plan sooner than required. In particular, if there are uncertainties in the solid waste management plan that could affect the approvability of the plan, then explaining how the SWMD will monitor those uncertainties and address them might alleviate concerns about the viability of the plan.

Examples of uncertainties that could affect approval include:

- the SWMD's ability to remain financially solvent (due to something like inability to accurately project revenue; potential that SWMD may not be able to continue to collect revenue through an existing funding source; uncertainty about the future costs of programs, etc.)
- a planned major program that may or may not pan out;
- The potential that a program needed to achieve Goal 1 will be delayed
- a county-owned landfill that may or may not operate in the future;

When necessary, Ohio EPA encourages the policy committee to incorporate provisions for monitoring uncertainties, criteria specific to those uncertainties for determining if a material change in circumstances has occurred, and how the SWMD will address any changes in circumstances.

Surveying and Data

Differences between data previously reported and data presented in the plan

In most cases, Ohio EPA expects that data used to prepare the solid waste management plan will match data previously reported (such as in annual district reports and quarterly fee reports). However, there are legitimate reasons why data used for a solid waste management is different than previously reported data. If the data the policy committee uses for the plan differ from what was previously reported, then the policy committee will explain those differences in Appendix A.

Survey Toolkit

Shortly before completing the *District Solid Waste Management Plan Format, version 4.0*, Ohio EPA developed and implemented a statewide surveying initiative to help SWMDs obtain data from commercial and industrial businesses. That initiative was a

collaborative effort among Ohio EPA, the SWMDs, the Ohio Council of Retail Merchants, the Ohio Chamber of Commerce, and the Ohio Manufacturers' Association.

As part of the survey initiative, Ohio EPA developed standard cover letters and forms for SWMDs to use. Examples of those letters and forms are provided in Appendix R. Appendix R also provides recommendations for conducting surveying (i.e. best management practices).

Source Reduction

SWMDs will no longer be able to credit source reduction towards their waste reduction and recycling rates. Source reduction is automatically factored into the waste reduction and recycling rate through the reduction in waste generated due to waste no longer being produced.

Using Data from Previous Survey Efforts

For surveys from industrial and commercial businesses, **the policy committee cannot use data that is more than three years old.** Exclude any data from previous respondents that is more than three years old.

For surveys from scrap yards, buybacks, processors, MRFs, etc., **the policy committee cannot use data from a previous survey to supplement for non-respondents.** Provide data received from only the survey conducted for the solid waste management plan.

Data from scrap yards/scrap dealers

Ohio EPA cautions SWMDs that survey scrap yards/scrap dealers from relying on that data to demonstrate achieving the goals of the state plan. Ohio EPA strongly suspects that quantities reported by scrap dealers are often unreliable for a number of reasons:

- Scrap dealers likely report “non-creditable” materials, such as construction and demolition debris (C&DD) and vehicles.

Metals that result from construction and demolition projects are not solid waste and are not creditable material. C&DD is, by statute, excluded from being solid waste. This is a regulatory distinction. While recycling construction and demolition debris (C&DD) is a great thing and Ohio EPA encourages recycling C&DD, C&DD is not creditable to achieving the waste reduction and recycling rates. The quantities of C&DD disposed are not factored into generation. Including quantities of C&DD recycled but not disposed essentially results in a recycling rate of 100 percent for C&DD. Therefore, crediting C&DD skews the waste reduction and recycling rate.

This means that metal generated home renovation projects are not creditable to the residential/commercial recycling rate. This includes gutters, aluminum siding, wiring, plumbing, and metal window frames are C&DD and are not creditable.

- Scrap yards/scrap dealers may report metals from vehicles, such as auto bodies, auto parts, and any other vehicle bodies or parts that have not historically been disposed in landfills (such as farm equipment, tractor trailers, school buses, trains, etc.)
- Scrap dealers may not differentiate what county materials came from or which sector, residential/commercial or industrial, generated the material.
- Using data from scrap yards could result in double counting material. Appliances are an example. If another entity reports having recycling appliances and the scrap yard reported metals from those appliances, then double counting could occur.
- Quantities may be based on estimates rather than actual records.

Large Reported Quantities

Remember, if a quantity seems too good to be true, then it probably is too good to be true!

As an example, if the SWMD receives a survey response that includes appliances and the quantity reported equates to every resident in the SWMD having recycled a refrigerator, then the SWMD should not use that quantity regardless of how adamantly the respondent asserts the number to be accurate.

Footnotes to Tables:

Where applicable, after tables provide:

- Citations for source(s) of data.
- Explanations for assumptions used to generate projections.
- Sample calculations for math.

ATTACHMENT 1

List of Appendices (for the solid waste management plan)

- A. Reference Year, Planning Period, Goal Statement, Material Change in Circumstances, and Explanations of Differences in Data
- B. Recycling Infrastructure Inventory
- C. Population Data and Projections
- D. Waste Disposal Data and Projections
- E. Residential/Commercial Recycling Data and Projections
- F. Industrial Recycling Data and Projections
- G. Waste Generation Data and Projections
- H. Program Evaluation and Analysis
- I. Overall Conclusions and Descriptions of Programs to Be Provided (New Programs, Changes to Existing Programs and Unchanged Programs)
- J. Reference Year Opportunity to Recycle and Demonstration of Achieving Goal 1
- K. Diversion Rates and demonstration of Achieving Goal 2
- L. Outreach Plan and General Education Requirements
- M. Capacity Demonstration
- N. Evaluation of Greenhouse Gas Emissions
- O. Financial Data
- P. Ratification Results
- Q. District resolutions, certification statements, public notices, other notices (e.g. a copy of the notice sent to the 50 largest generators)
- R. Blank Survey Forms and survey results
- S. Siting Strategy (if needed)

- T. Designation/Flow Control (placeholder for formal documents, not a description of the SWMD's flow control)
- U. District Rules