

TO: WARREN JOHNSON, METRO
FROM: JURI FREEMAN AND DAVID STEAD, RRS
DATE: JUNE 4, 2017
RE: SUB-COMMITTEE FEEDBACK RESPONSE

SUB-COMMITTEE FEEDBACK

METRO COMMENTS

1. In the background section (page 5), it might be useful to add some material from the RFP scope of work to better frame the context for the evaluation. (See the highlighted sections in the attached document for suggestions). I think that the RFP provides a useful and concise intro on fees and taxes and what Metro is and does. **Added a new introduction to the report (included in Section 1).**
2. It is important to be clear in the report that Metro's franchise and licensing system is not an "asset" in the same context as Metro's facilities. **Corrected.**
3. As written, the report sounds like each of the three counties in the region have their own goal as opposed to the Metro Wasteshed having the goal. **Corrected (see edits in 'Background' section).**
4. The "Review of the Report" section (Fig. 1.2) (page 6-7) is not very clear – listing a mixture of substantial and non-substantial info. Perhaps focus on a few main points comparing the efforts and consigning Figure 1.2 to an appendix. If you do put Fig.1.2 in the Appendix, make sure you keep the note about there not being 2006-9 date not being available. **Moved Figure 1.2 to report Appendix – added a new Figure 1.2 'URS Report Update'**
5. Also, it references the "2016/17 updated report" instead of saying "this report." **Changed in table, also moved table to appendix.**
6. What seems missing from the "Review of the Report" is mention or reference to *Section 2.1 Problem Statement* in the 2006 URS report. I suggest there be a summary of the problem statement from that report and a new "Problem Statement" for this report.

(e.g., what were the problems identified in 2006? Are they still the problems today? Are there new ones?"). Added a new table 1.2 showing 2006 'problems' and 'recommendations' and the current status of both in Metro.

7. The simple Table 2 (and Table 1) in the 2006 report seems to be very useful and I would suggest something similar for the new report. Added a new table (Figure 1.8) showing simple breakdown of tons on an annual basis.
8. In Fig. 1.7 the tonnage value for "Reduced RSF and ET 18.0% (266,400 tons)" is not elsewhere in the document that I could see. It referenced elsewhere? Corrected – added a new table showing simple breakdown of tons (Figure 1.8)
9. The "Exempted" average annual tonnage in Fig. 1.17 is 12.3%, but it is listed as "12%" in the text above fig 1.11 and "11.4%" in fig. 1.10. This is confusing. Are these rounding errors? The years being analyzed are different due to incomplete data sets – Figure 1.7 is 2012 – 2105, Figure 1.10 is 2012 to 2016, and Figure 1.11 is 2010 to 2016. See responses to Martinez comments for additional changes to correct report.
10. Fig. 1.3 - error - it's RSF not RST in the chart title. Corrected in Figure 1.3
11. Page 9 on "Definitions" at the bottom, it shouldn't have a comma after "Chapter 5.00" Corrected.
12. Page 15 at the very end of the last paragraph it needs a period after "2017" Corrected.
13. Page 20 in "Policy Rationale" for tire residual, it says that if there was a commodity crash the "public would need to pay for" it. Please explain this and why should the public pay for it? The processor could have insurance, etc. Corrected.
14. Page 30, second paragraph, first sentence. There should be no period after "both" Corrected. RRS conducted another round of internal proofreading.

SCHNITZER COMMENTS

Schnitzer encourages RRS to revise Section 1 of the Draft Report to accurately reflect the history of the RSF/ET exemption for shredder residue used as ADC. This includes, at a minimum, revising the subsections titled "Historical Perspective" and "Metro Challenges" to reflect the fact that shredder residue was one of the first—if not the first—materials exempted from Metro taxes and fees when used as ADC and that the justifications for this exemption have not changed for more than two decades. Revised the 'Historical Perspective' section to indicate the long history of exemptions for Auto Shredder in Metro.

RRS should also revise the graphic on page 13 of the Draft Report. At a minimum, the graphic should include the following events on the “Regulatory Action” timeline:

- 1994: Metro recognizes that shredder residue is exempt from user fees and excise tax when accepted by landfills at no charge and intended to be used, and in fact used, for a beneficial purpose.
- 1998: Metro codifies user fee exemption for useful materials that are accepted by landfills at no charge and intended to be used, and in fact used, productively in the landfill.
- 2000: Metro codifies excise tax exemption for useful materials that are accepted by landfills at no charge and intended to be used, and in fact used, productively in the landfill.

Revised timeline as suggested.

2. Context and Direction to RRS

The historical context provided to RRS by Metro suggests a system of RSF/ET exemptions that is difficult to understand, has ballooned over time, and needs to be “fixed.” But the historical perspective provided above and the interviews conducted by RRS paint a different picture. Landfills and entities that rely on the current RSF/ET exemptions appear to have no trouble understanding the current exemptions, and many of the categories of materials covered by the current exemptions have been exempted from the RSF/ET for more than two decades, without any adverse effect on the region. The Draft Report does not appear to provide any compelling justification for significantly altering the current RSF/ET exemptions.

Schnitzer recognizes that certain minor revisions to the Metro Code may improve the clarity of the current RSF/ET exemptions.

Schnitzer encourages RRS to consider, as it revises the Draft Report and develops its recommendations, how revisions to clarify the RSF/ET exemptions, as opposed to revisions to overhaul the exemptions, may better align the exemptions with Metro’s goals.

Recommendations Section includes potential revisions to current policies as well as alternative policies for consideration.

3. Assessment of Current Metro Policy

RRS analyzed the extent to which Metro’s current RSF/ET exemptions and reductions meet four goals and provided a “score” associated with each goal in Figure 1.4 of the Draft Report. These scores seem highly subjective and certain of the scores assigned by RRS seem inconsistent with the feedback RRS received through its interviews. For example, one of Metro’s goals is to ensure that the Metro Code, and administration of the Metro Code and policy, are easy to understand and transparent for actors in the region. RRS assigned a score of “D+” to the current RSF/ET exemptions and reductions in meeting this goal. Yet, nearly every landfill and entity relying on the RSF/ET exemptions and reductions stated they believe the current exemptions and reductions are simple and transparent. To the extent there is a lack of consistency or transparency, the interview responses suggest these issues are narrow and could be resolved with targeted clarifications rather than wholesale revisions to the current exemptions and reductions.

Because the “scores” apply to all types of material eligible for the exemptions and reductions, they are unhelpful in identifying whether issues relate to the entire system of exemptions and reductions or whether they relate to specific categories of material. As a result, the grades could be misinterpreted to suggest wholesale revisions to the existing RSF/ET exemptions and reductions are necessary when the information in the Draft Report does not seem to support that conclusion.

The consultant team revisited the scores based on additional feedback from stakeholders gathered during the stakeholder process and feedback period. RRS revised the qualitative scores slightly to reflect the additional input, please see Figure 1.4.

4. Comparisons to Other Jurisdictions

The Draft Report compares Metro's current RSF/ET exemptions and reductions to fees and taxes assessed on similar materials by other jurisdictions. The Draft Report does not, however, analyze whether those other jurisdictions are similarly situated to Metro or whether regulated entities in those other jurisdictions are similarly situated to regulated entities in Metro's jurisdiction. Without such a detailed comparison, Schnitzer cautions against using other jurisdictions' fee and tax policies as a primary justification for changing Metro's current RSF/ET exemptions and reductions.

Added a new column to Figure 3.2 indicating landfill and transfer station presence in region and added a Metro Oregon row to Figure 3.2 to make comparisons easier. Every jurisdiction is unique and we agree, there is not a jurisdiction that is exactly the same as Metro. The jurisdiction research was used to show the range of options and systems, as well as a comparison to systems, that while not identical to Metro, have many similarities.

SILTRONIC COMMENTS

I spoke with Juri about this, but wanted to remind him that on page 17, of the draft research findings, it should say filter press cake not filter cake waste.

Corrected. Changed filter cake waste to filter press cake throughout the report.

MARTINEZ COMMENTS

Graphs: Figure 1.3, Page 14: While this is an informative graph, I think it would be useful if we add yearly tonnage via bar graph to this graph, so that we see how tonnage and RST and ET rates coincide.

Yearly tonnage for all the years in the graph was not available to RRS- perhaps Metro can add this or share this data with the stakeholder group?

Figure 1.5, Page 22: I would prefer (or at least in addition) to see tonnage per capita. There's been increase attention to population boom, so it would be helpful to account for population. Is there a way we can determine the population serviced by Metro?

Good suggestion. If the data is available from Metro on population serviced per year from 2010 through 2015 RRS can add a per capita disposal metric / figure.

Figure 1.6, Page 22: I see what the graph is doing, but I am not sure I see the benefit of this graph. Focusing on quarters can have some seasonality factors, can we annualize or alternatively can we just compare this specific quarter over the previous years? Graph was designed to allow the reader to compare Q3 for 7 years of data. The data indicates that Q3 in 2016 was the highest amount which led RRS to the conclusion that 2016 was on the way to having the highest annual total since 2010. However, we agree with your comment that the graph is a little confusing and did not add much to the report. Thus, the graph was removed from the final revision and a footnote was added instead.

Figure 1.7, Page 23: I like this graph and I think it's important to have. In addition, can we break this down a bit, to bar or line graph, to see what and when spikes occurred throughout 2012-2015.

Added a new figure (Figure 1.8) showing annual amounts, totals, and averages.

Also, can we stick to a uniform time frame when comparing year to year? Some focus on 00-17, 10-15, and 12-15. Unless of course were focusing on a specific year or quarter.

Good suggestion, although showing more years of data would be preferable, there were limitations around what data was available for the analysis and the format of the data. We have adjusted Figures 1.9 to 1.12 to reflect the same 4 year time period (2012-2015).

Figure 1.9 and 1.11, Page 24: I would like to see these together. If there were any major policy change in 2012 or 2012 can we signal it? The timeline is very helpful; in 2012 DEQ introduced limit amounts to ADC after experiencing a large spike in exempted disposal levels, but they had already been cooling off (esp. in 2012) and have continued since. In 2012 recycling and commodities declined and we see a corresponding spike in reduced tax and fees, is there a story here? Personally, I would like to see more historical data in this format if it is available. Unfortunately, historical data is not available in a comparable format. We have added a new figure (Figure 1.14) to compare the 2010 – 2015 time period to the six years covered in the URS report (2000-2005).

Figure 1.12, Page 25: I am having a little trouble with this and I think it is because I am not familiar with these materials. It makes sense that Auto Shredder Residual represents a larger portion of exempted material because it is typically heavier (my assumption, maybe its not) so any spike would be overstated? Am I thinking about this incorrectly? All of the materials in the figure are 'useful materials' and are exempted from the fees and taxes. Figure 1.12 (the pie chart) displays the average proportion (by weight) of total useful material by material type for the six year period from 2010 to 2015. Auto shredder residue is the majority of the useful material exempted from ET and RSF. The table shows the annual amounts for each material as well as the annual percentage of the total.

Would it be better instead to show percentage changes over time?

For your reference, here is a similar figure showing % change YOY. We did not include it in the report.

	2010	2011	2012	2013	2014	2015	Annual Avg.
Auto Shredder Residual	129,610	136,088	93,029	88,076	90,527	75,846	102,196
% Change (YOY)	N/A	5.00%	-31.64%	-5.32%	2.78%	-16.22%	N/A
Tires Residual	33,884	27,217	21,405	22,669	31,747	31,409	28,055
% Change (YOY)	N/A	-19.68%	-21.35%	5.91%	40.05%	-1.06%	N/A
Dredge	-	68,890	-	-	49,450	36,453	25,799
% Change (YOY)	N/A	N/A	N/A	N/A	N/A	-26.28%	N/A
Shaker Screen Waste as ADC	5,199	15,378	10,644	10,335	13,409	14,110	11,513
% Change (YOY)	N/A	195.79%	-30.78%	-2.90%	29.74%	5.23%	N/A
Roofing waste as roads	7,221	5,116	3,362	5,906	5,226	9,915	6,124
% Change (YOY)	N/A	-29.15%	-34.28%	75.67%	-11.51%	89.72%	N/A
Sandblast Grit used as ADC	0	0	0	0	0	6799	1,133

% Change (YOY)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Crushed Glass as Drainage	7,912	7,825	4,371	4,609	2,828	231	4,629
% Change (YOY)	N/A	-1.10%	-44.14%	5.44%	-38.64%	-91.83%	N/A
Filter cake as ADC	-	157	282	172	226	248	181
% Change (YOY)	N/A	N/A	79.62%	-39.01%	31.40%	9.73%	N/A
Mullite/refractory brick as ADC	877	2,646	2,335	2,430	2,460	1,846	2,099
% Change (YOY)	N/A	201.71%	-11.75%	4.07%	1.23%	-24.96%	N/A
TOTAL	184,703	263,160	135,146	134,025	195,647	176,609	181,548
% Change (YOY)	N/A	42.48%	-48.64%	-0.83%	45.98%	-9.73%	N/A

Page 29 DEQ: Is this the DEQ review process description Juri was referring to? To me personally it may be helpful to explain the DEQ review process in practice (e.g. person goes out reviews and tests material, receives signature from landfill supervisor, turn around is 1 business day). [Here is the review process from OR DEQ – we did not include the details in the report as its pretty long.](#)

Oregon Department of Environmental Quality Directive

Guidelines for Alternative Daily Cover Material Application

Approved by: Lorena Pickwell

Date Approved: 6/29/06

Introduction	This document provides guidelines for landfill operators to use in applying for Department of Environmental Quality (Department) approval to use alternative daily cover material (ADCM) in lieu of earthen cover material at a municipal solid waste landfill (MSWLF).
Regulatory background	Oregon Administrative Rule (OAR) 340-094-0040 requires application of a suitable cover material over any exposed waste at the end of each operating day at all MSWLFs subject to 40 Code of Federal Regulations (CFR), Part 258, as adopted in OAR 340-094-0010. Daily cover must consist of at least six inches of earthen material or an alternative material that provides equivalent performance and has been approved by the Department.
Purpose of daily cover	The purpose of the daily cover is to protect the environment and public health by: <ul style="list-style-type: none"> • controlling the spread of disease vectors • preventing fires • controlling odors • preventing blowing litter • preventing scavenging • controlling dust • acting as a moisture barrier by minimizing precipitation infiltrating the waste, and • improving site aesthetics
Examples of approved ADCMs	The Department has approved ADCMs on a case-by-case basis. A majority of MSWLFs in Oregon currently use ADCMs either for demonstration purposes or permanently after completing the demonstration phase. While not an exhaustive list, the approved ADCMs include commercial products such as geosynthetic tarps, and indigenous waste materials such as paper sludge, auto shredder fluff, and spent refractory (alumina brick).
Need and purpose of guidance	The Department receives numerous inquiries seeking guidance on the use of a variety of commercial products and indigenous waste materials as ADCM. The purpose of this guidance is to assist landfill operators in preparing and submitting applications for trial use and demonstration of an ADCM and in obtaining final approval for long-term use of the material.
Use of this guidance	This guidance describes what is expected in an ADCM application and defines the process leading to Department approval or denial. Use of the guidance should enable the applicant to efficiently organize and present the information and facilitate the Department's review and approval process. The guidance should be used in conjunction with the Department's solid waste rules.

ADCM approval	<p>To obtain Department approval of an ADCM, the applicant must demonstrate that the proposed material and application of the material will:</p> <ul style="list-style-type: none"> • perform all the functions of a daily cover specified by 40 CFR 258.21 (e.g., control disease vectors, fires, odors, blowing litter, and scavenging), • be compatible with relevant site-specific location and design and operational conditions as required by OAR 340-094-0040(8) (e.g., hydrogeologic setting, climate, proximity of residences, site screening, availability of equipment and cover material, any past operational problems, and any other relevant factor), and • not create a potential environmental or human health hazard.
Trial period	<p>All requests for ADCM approval will require a trial period of ADCM use and evaluation to demonstrate the ADCM is as protective as earthen daily cover material.</p>
Fees on Wastes Used as ADCM	<p>Trial period: During the trial period, solid waste used as ADCM is subject to all applicable Department fees as described in OAR Chapter 340, Division 097, including the per-ton solid waste disposal fee in OAR 340-097-0120(5).</p> <p>Long-term use: Solid waste that the Department has finally approved for use as daily cover is exempt from the per-ton solid waste disposal fee in OAR 340-097-0120(5) when used as daily cover. This fee exemption applies only to the quantity of ADCM that is used in a manner demonstrated to be equivalent to six inches of earthen material per 40 CFR Part 258.21. Quantities of ADCM-qualified waste placed on or in the landfill in excess of the amount needed to provide the equivalent of six inches of daily soil cover are subject to all applicable fees. Quantities of ADCM-qualified waste received but not used during a reporting period are also subject to all applicable fees; fees are waived in the reporting period during which the approved waste is actually used as ADCM.</p>
Objective of trial period	<p>A field evaluation is required to demonstrate the suitability of ADCM since each ADCM request is unique. The field evaluation should account for relevant site specific factors and ADCM properties. The purpose of trial ADCM use is to:</p> <ul style="list-style-type: none"> • characterize its physical and chemical properties as they relate to its function as daily cover material • objectively observe and measure its daily and seasonal performance • optimize procedures for its application • identify its advantages and disadvantages • determine any constraints or limitations on its use

Application for trial use

In the application for a trial use period, the applicant should include the following information and workplan, as appropriate:

- rationale for how the proposed ADCM is expected to achieve equivalent performance to 6 inches of earthen material in controlling disease vectors, fire, odors, blowing litter, and scavenging
- a list of all parameters that are thought to affect the performance (including limitations) of the proposed ADCM, including physical and chemical properties
- any potential site or material limitations related to the proposed ADCM to be evaluated during the trial period

Examples: A site with leachate disposal constraints needs to assess ADCM impact on leachate quality and quantity and determine any limitations imposed by leachate constraints on ADCM use; a site in windy location needs to assess ADCM susceptibility to wind dispersion and determine any limitations on ADCM use imposed by the wind

- testing methods and frequency to be used to measure performance and consistency in the material to be used as ADCM
- the name of the individual responsible for observing and documenting ADCM performance and a description of the role and frequency of observations
- a description, for each performance criteria, of a field demonstration designed to determine the ADCM density, thickness, and method of application needed to meet the criteria and how the ADCM performed compared to 6 inches of earthen material
- the appropriate information for the type of material, according to the following table:

If ADCM consists of...	then provide.....
commercial products	<ul style="list-style-type: none"> • manufacturer name and address • manufacturer/distributor contact name and telephone number • a product description including relevant physical and chemical properties • a reference list of sites where the product has been approved for use as a ADCM (Include user contact name and telephone number)
indigenous materials that would otherwise be classified as waste	<ul style="list-style-type: none"> • generator name and address • generator contact name and telephone number • the quantity and availability of the material • an explanation of how the waste is expected to exhibit physical and chemical characteristics consistent with functions and limitations of the material • a characterization of the waste and a description of the source and process generating the waste (e.g., waste composition including hazardous constituents and waste density)
cleanup materials or other materials currently under regulatory oversight	<ul style="list-style-type: none"> • the name(s) and contact person(s) of any regulatory agency(s) involved in cleanup oversight • a list of landfills, if any, where the waste has been approved for use as ADCM, the name and phone number of a contact person at the agency which approved the material, and a summary of the conditions of each approval • the availability of the material for regular use at the landfill • a description of any stockpiling practices (e.g., size and location of stockpile, stormwater management, erosion control)

Trial Period Trial ADCM use must account for all seasons of the year, and therefore should last for at least fifteen months to allow twelve months for testing and three months for preparation and Department review of the ADCM Performance Report.

ADCM Performance Report Based on implementation of the workplan during the trial use period, the ADCM Performance Report should:

- identify parameters that affect the performance of ADCM, including physical and chemical properties
- identify the ADCM thickness and density needed to achieve comparable function to six inches of soil
- provide summary conclusions about how the ADCM achieves equivalent performance to six inches of earthen material
- provide a description of how the ADCM performed relative to each criteria (e.g., disease vectors, fire, odors, blowing litter, scavenging, dust, site aesthetics, and moisture barrier), including equivalence observations
- propose operational criteria for long-term use, including application equipment and procedures, inclement weather provisions, and daily recordkeeping
- detail any other relevant comments, concerns, limitations, advantages, or disadvantages

Approval criteria To be approved for long-term use as an ADCM, the material must be shown to perform all functions of a daily cover specified by federal regulations as adopted in OAR 340-094-0010 and pose no environmental or human health hazard.

The following table summarizes the criteria and performance requirements for long-term ADCM approval:

Criteria	Required ADCM Performance
Controls Disease Vectors	All ADCM must be demonstrated to control disease vectors comparable to a 6-inch thick soil cover.
Controls Fire	All ADCMs must be shown to control fire. At sites with a history of landfill fires, the ADCM must be demonstrated to control fire comparable to a 6-inch thick soil cover.
Controls Odors	All ADCMs must be shown to control odors. At sites with a history of landfill odor problems and/or complaints, the ADCM must be demonstrated to control odors comparable to a 6-inch thick soil cover.
Controls Blowing Litter	All ADCMs must be shown to control blowing litter. At sites with a history of litter problems and/or complaints, the ADCM must be demonstrated to control litter comparable to a 6-inch thick soil cover.
Controls Scavenging	All ADCMs must be shown to control scavenging. At sites with a history of landfill scavenging problems, the ADCM must be demonstrated to control scavenging comparable to a 6-inch thick soil cover.

Reduces Infiltration	At sites with relevant leachate management constraints, ADCMs must be shown to act as a moisture barrier.
Controls Dust	At sites with dust problems on the working face, ADCMs must be shown to control dust.
Enhances Aesthetics	At sites with complaints related to the aesthetics of the working face, the aesthetics of ADCMs must be considered.

ADCM Approval Letter

When the Department approves a material for long-term use as an ADCM, the Department will send the applicant an approval letter that includes the following:

- a definition of the approved ADCM that references the characteristics of the material used during the trial period
- the thickness and density of the material being approved as ADCM (only this amount of material used in daily cover may qualify for fee waiver)
- a summary of how the amount of ADCM usage will be measured and recorded
- any constraints or limitations on the use of the ADCM
- clarification that solid waste reporting forms have been updated to require submittal of detailed daily ADCM usage records whenever, during a reporting period, ADCM usage exceeds 15 percent of all received residential and commercial domestic solid waste and construction and demolition waste tonnage

ADC 6/20/2006.doc

Current Exemptions and Reduced Fee by Material Use, Page 17:

I really like the in depth detail. Since there is an approximation for tonnage per year, I am wondering if we could graph these compositions from 2000-now? This way we can see which material is more salient overtime. We only have data from 2010 through 2015 for useful materials, and from 2012 through 2015 for reduced fee materials. The useful materials data is included in Figure 1.13 and the reduced fee in Figure 1.8. We added a new figure (Figure 1.14) to compare to the previous study period. Data on captive landfill tonnages were not available for the report. Same for recyclables and organics.

Interviews/Other Comments:

Figure A.2: Impact of Exemptions on Landfill and Business Operations, Page 48 If this is not confidential, can we add how much of the landfill tonnage is Metro produced vs. how much is non-metro produced for each designated landfill? This can help us truly see how dependent their portfolios are on Metro and how they will be affected by any change. Great question. Unfortunately, this data was not available for the report and is proprietary information from landfills.

Is there a reason we did not include Haulers in the interview process (maybe I missed it)? I think it may be beneficial to get their input as well. I also wonder how their pay structure works? Are they paid off tonnage or how many customers they service? Haulers are generally paid by their commercial customers on a contract basis. Charges can be for regular scheduled collection services, on-call collections, transfer loads, or other services. A lot of the 'useful materials' are direct haul from the generator to the landfill and a third-party hauler is not involved in the transaction.

They also pay per tonnage to the landfill right? For useful materials, the landfill is prohibited from charging a disposal fee. They can charge processing or transportation fees on the materials. Landfills typically charge gate fees per ton of material, the gate fees can vary by material type and on a contract basis. In general, surcharges and gate fees at the landfill are pass through costs from the hauler to the generator. The hauler builds the rates charged by the landfill for disposal into the rates they charge their

customers. The costs of disposal (landfill tip fees, surcharges, etc.) are only a small portion of the total operating costs for the hauler. The majority of their costs come through the trucks, staff, O&M, containers, etc. In a direct haul situation, the gate fees are built in as an expense of doing business.

Also, Can we show who the major generators are and their respective tonnage? This way we can get a picture of generators needs. The generator data is proprietary. We shared the useful material types, but not individual generators of each material.

Finally, can we add a graph that highlights “loss of dollar amounts” from exempted and reduced rates not charged at full rate. The budget impacts were out of scope for the project. The project aim was at the policy and material level, not \$ amounts. That being said, the report does contain information on total tons of exempted and reduced fee materials, tons for each material class, and the rates for RSF and ET which can be used by the reader for individual calculations.

GREENWAY RECYCLING

Terrell Garret sent a letter discussing Metro legal authority.

Added statement to the report indicating that RRS is not a legal expert. The report, review, and recommendations included in the review are written with the presumption that Metro does have the proper legal authority to manage the RSF and ET system. RRS is not evaluating the regulatory authority of Metro.