



**MINNESOTA
RESOURCE
RECOVERY
ASSOCIATION**

September 15, 2023

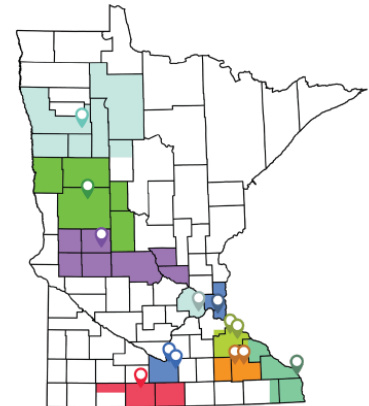
Dear Mr. Sandhei,

Thank you for the opportunity to comment on the Draft Metropolitan Solid Waste Management Policy Plan (MPP). The Minnesota Resource Recovery Association (MRRA) members operate eight waste-to-energy (WTE) facilities across the state that divert nearly 1,000,000 tons of waste from landfills each year while generating useful energy in the process. Our facilities are primarily located in rural Minnesota counties (Blue Earth, Otter Tail, Polk, Pope, Douglas, Goodhue) and metro, including Olmsted, Ramsey, Washington, and Hennepin. The MMP is a bellwether, ultimately impacting all our members.

MRRA members' priority is managing waste. The result of waste-to-energy management is the production of energy as either electricity or steam. Managing waste using WTE technology is supported by the Minnesota Pollution Control Agency (MPCA) and state law via the waste management hierarchy to protect human health and the environment.

MRRA facilities serve 31 of the 87 counties in the state. Our member counties are committed to and have invested in integrated solid waste programs. These programs work to maximize resource recovery, advance solid waste education, and align with state policy goals as overseen by the MPCA.

MRRA facilities manage over 1,000,000 tons of trash each year and reduce the need to truck trash long distances across the state and even out of state, reducing emissions from trucks and responsibly managing trash where it is generated. Electricity generation from Minnesota waste-to-energy facilities accounts for approximately 0.75% of total annual electrical generation in the state.



The MRRA wants to commend the MPCA for recognizing the important role that facilities play in an integrated solid waste management system. The MRRA continues to support the goals of the waste hierarchy (Minn. Stat. § 115A), which include:

1. Reduction in the amount and toxicity of waste generated
2. Separation and recovery of materials and energy from waste
3. Reduction in indiscriminate dependence on waste disposal
4. Coordination of solid waste management among political subdivisions
5. Orderly and deliberate development and financial security of waste facilities, including waste disposal facilities

MRRA members fully support the importance of managing waste at the upper levels of the waste hierarchy. MRRA members all support robust waste reduction and recycling programs.



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Regarding MPP content,

- The MRRRA supports Policy 20, identified under goal 3, to “assure that elected county officials understand the importance of supporting and maintaining WTE facilities.” In addition to educating county officials, the MPCA should take the lead to ensure that state legislators also understand the importance that WTE facilities play in managing waste not only in the metro region but across the state. Legislators need to understand the impacts of prematurely closing WTE facilities.
- Under “Part three” of the MPP, the MRRRA applauds the MPCA for again stating that resource recovery facilities should be used at their full capacity with the goal of limiting the amount of waste that is landfilled. The MRRRA supports the MPCA’s objective of landfilling less than 5% of waste.
- Under “state-led strategies,” the MRRRA agrees with how the MPCA describes the benefits of WTE facilities. WTE facilities reduce the environmental risk associated with waste disposal, there are not legacy impacts associated with WTE facilities, and WTE facilities reduce greenhouse gas emissions as compared to landfills. Waste-to-energy facilities in Minnesota are well-operated and compliant with federal and state air permit requirements.
- The MRRRA fully supports the MPCA’s statement that “Closing WTE facilities without a strong plan is inadvisable. It will only result in more landfilling and less material recycling, rather than increasing recycling and composting.” The closure of the Elk River Resource Recovery facility in 2019 increased landfilling by more than 250,000 tons per year and decreased recycling.
- The MRRRA supports the concepts identified in strategy 54 -Implement additional fees to better account for the externalities of land disposal. The MRRRA agrees that long-term expenses associated with landfill monitoring and cleanup should be accounted for when establishing landfill fees.
- The MRRRA supports the Key Theme that Extended Producer Responsibility is essential to waste management. Waste will continue to become more complex, more toxic, and less recyclable until manufacturers partner with waste managers to make products that are readily reused and recycled instead of landfilled or incinerated.

Thank you again for the opportunity to comment. We hope this feedback contributes to a more effective policy plan that accelerates progress toward effectively managing waste. We look forward to working with the MPCA as it strives to develop waste strategies for the future that will benefit everyone.

Sincerely,

Chris McConn
MRRRA President