

July 22, 2026

Alison Cameron  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, MN 55155

RE: COMMENTS ON DRAFT RESOURCE MANAGEMENT REPORT

Dear Ms. Cameron,

On behalf of the Prairie Lakes Municipal Solid Waste Authority (PLMSWA), I am writing to share our comments on the draft Resource Management Report (Draft Report), May 2026. Representing five counties commissioned by Minnesota Statute 115A and 400, PLMSWA shares the Minnesota Legislature's interest in a path towards zero waste. Thank you for your tremendous efforts to create a statewide vision to power us through the next generation of "resource management". While we embrace the goal, it is so far from the status quo that more achievable milestones need to be added. Resource recovery and landfilling need to be separated as two different management methods; and resource recovery needs to be listed as a preferred alternative to landfilling.

**Legislative Charge**

Minnesota's Legislative charge (page 1) to the Minnesota Pollution Control Agency (MPCA) pre-determined the solution to, "...prepare a report to reduce the amount of materials disposed of in landfills or incinerators statewide by more than 90%...". This phrase is of particular interest for two reasons: 1) It sets a tremendous goal to change the fate of 2.7 million tons of waste each year and; 2) it does not show any preference between landfilling and incineration (resource recovery).

### **Solid Waste Hierarchy**

The solid waste management hierarchy (Minnesota Statute 115A.02, “Legislative Declaration of Policy: Purposes”, Paragraph b) listed the order of preference for management methods in order of greatest to least:

- (1) waste reduction and reuse;
- (2) waste recycling;
- (3) composting of source-separated compostable materials, including but not limited to, yard waste and food waste;
- (4) resource recovery through mixed municipal solid waste composting or incineration;
- (5) land disposal which produces no measurable methane gas or which involves the retrieval of methane gas as a fuel for the production of energy to be used on site or for sale; and
- (6) land disposal which produces measurable methane and which does not involve the retrieval of methane gas as a fuel for the production of energy to be used on site or for sale.

The Draft report fails to follow the Hierarchy. Resource recovery is and should continue to be more preferred than landfilling. As an owner and operator of a resource recovery facility, with a value of approximately \$70 million, this error needs to be corrected. PLMSWA fully embraces the waste management hierarchy as part of an integrated waste management system. Reduce, reuse and recycle are the most-preferred management methods. After them comes resource recovery, followed by land disposal with retrieval of methane gas lastly land disposal without retrieval of methane gas.

We cannot forget the reasoning behind the Hierarchy. Statute 115A.01 lists key qualities including, reduction of volume and toxicity; and recovery and separation of materials and energy.

### **Pathway to 90% Diversion**

Since 1988, Minnesota, the MPCA and its Governor's Select Committee on Recycling and the Environment (SCORE) have worked aggressively to reduce, reuse, and recycle. This is a tremendous task. After 34 years, Minnesota reached a recycling rate of 45.2% (According to 2022 SCORE Report)- with a plateaued trajectory. This was the lowest hanging fruit. Doubling the recycling rate to 90% in 24 years (by 2045) will be exponentially more difficult.

The Draft Report refers to recent Residential MSW composition study (2021, p 23) and assumes that only 11% of waste is non-recyclable. PLMSWA operates a front end MRF at its material recovery facility. Additionally, Otter Tail, a PLMSWA member county, has performed waste characterization studies with its own staff. From what we see in the waste; and what we hear at trade associations, waste is becoming increasingly less recyclable. We believe the percent of waste that is not recyclable is significantly higher. Additionally, the Draft Report does not review market capacity for recycled materials. While many materials, like ferrous and non-ferrous metals, have a virtually limitless market capacity, PLMSWA questions the market capacity for other resources like textiles and recyclable wood.

### **Cost and Economic Impact Assessment**

The Draft Report states 90% diversion is an "economic opportunity that will result in \$8.91 billion in "economic output", generating 22,144 jobs (page 88) with a capital cost of \$980 million (Page 78). Each of the member counties at PLMSWA has 34 years of experience operating recycling programs for landfill diversion. We are certain the economic impact of 90% diversion is a net cost, not a net revenue. Below are several problems with the Draft Report:

- The creation of jobs is an expense, not a revenue. The value of the products generated is revenue. Minnesota does not have a job shortage. It has a productivity shortage.
- The source of the data (Tellus Institute, 2023) derives its job creation data from older sources (2009 update to R.W. Beck Report) that is less exclusive to MSW. It should reference more recent studies including the latest EPA Recycling Economic Information Report (2020).

- The capital expense estimate was limited to a collection of comprehensive drop-offs (transfer stations), material recovery facilities, compost facilities and mixed waste processing facilities. In 2021 the EPA prepared a Recycling Infrastructure Report focused solely on modernizing capacity for packaging and composting. It estimates, “low end” costs of \$132 billion (nationwide). Prorated to Minnesota, it appears the Draft Report has underestimated costs.

### **Role Models and Case Studies**

The Draft Report provided numerous small-scale examples of new ideas how to reduce, reuse or recycle. These ideas are worth investigating. However, they are inadequate when considering state-level resource management. Minnesota needs to review successful large scale programs. There is no question that the European Union has for decades outperformed Minnesota and should be included in the final report. Why Europe isn't in the Draft Report is unknown. We do know that Resource Recovery is widely accepted in Europe.

### **Resource Recovery**

The Draft Report not only neglected Resource Recovery's position in the waste management hierarchy, it presented resource recovery very negatively and inaccurately. For example, under its review of Human Health and Cumulative Risks, it tabulates, “likely contaminants of concern” by facility type (Table 38, page 110). Dioxins and Furans are listed for Resource Recovery and Ash Landfills. The draft report mentions dioxins 50 times (pages 112, 137, 138, 139, 141, 142, 146, 149, 166, 169, 197, 203, 205, 206, etc. )- exclusively associated with air and groundwater contamination from Resource Recovery. The report references “Passarina et. Al., 2014” (page 206), but no additional information on Passarina is provided in the references at the end of the report. PLMSWA recently received its third-party stack testing results for testing performed April 28-30 of 2026. The results show Dioxins and Furans are limited by its MPCA permit to 20 ng/dscm. Our test results averaged less than or equal to 1% of the permitted limit. Dioxins and furans are not a “likely contaminant of concern” at PLMSWA. The MPCA routinely receives emissions data from all the resource recovery facilities in Minnesota and should use actual recent data to characterize and define, “likely contaminants of concern”.

While the Draft Report mentions the shortcomings of Resource Recovery, it never mentions its benefits, like PFAs destruction. This would help avoid unintended consequences that

may come about by poorly developed ideas. With zero dollars in state funding, four resource recovery facilities in Minnesota have tested for PFAs concentrations in air emissions. The results are remarkable with 99.6-99.97% removal efficiency. Recently (June 2026), the EPA finished a similar study with ReWorld in Okahumpka, Florida with similar results. What other treatment technology is destroying PFAs (not just isolating it)? This should not come as a surprise. It is no secret that thermomechanical treatment (resource recovery) with adequate temperature and residence time effectively treats many organic compounds. And why does this matter? Upon a preliminary review of the Toxic Substances and Control Act (TSCA) Chemical Substance Inventory, one will find that many of the substances listed are organic compounds.

## References

Having noticed the incomplete reference for Passarina et. Al., 2014, several additional references in the Draft Report were checked. The report refers to Ollson, Winkler, Candela, Cao, Gu, Mayo Clinic, Rix in the body of the report without proper citation. Use of the “Works Cited” (page 454) could not be found within the Draft Report of the literature. Examples include Adler, Arlington, CalRecycle, Chinn, Dennis, Gordon Food Service, and Keaggy. PLMSWA feels that the intent of the public comment period is invalidated by these errors. The MPCA needs to default to a second comment period with an updated report that accurately references the sources of its information.

## Conclusion

State agencies are often tasked with a challenging role of meeting new goals set by legislatures to solve real-world problems. PLSMWA applauds Minnesota's legislatures for seeing the need to better manage waste. State agencies need to furnish the expertise to translate hypothetical goals into something feasible in the context of science, financial limits, technology and market conditions. If the goal set by the legislatures is not perfectly worded, it is the agency's responsibility to delicately guide them to the best solution. We respectfully request your consideration to revise the report in consideration of our comments – specifically the unique benefits that resource recovery has over landfilling.

If you have any questions, feel free to contact Chris McConn at [cmcconn@ottertailcounty.gov](mailto:cmcconn@ottertailcounty.gov) or 218-998-8904.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Denny", is written over a horizontal line.

Tim Denny, Board Chair  
Prairie Lakes Municipal Solid Waste Authority

A handwritten signature in black ink, appearing to read "Chris McConn", is written over a horizontal line.

Chris McConn, Executive Director  
Prairie Lakes Municipal Solid Waste Authority