



August 7, 2026

Alison Cameron
Minnesota Pollution Control Agency
520 Lafayette Road North
Saint Paul, Minnesota 55155

RE: Comments on the Draft Resource Management Report

Dear Ms. Cameron:

Olmsted County appreciates the significant effort undertaken by the Minnesota Pollution Control Agency (MPCA) to prepare the Resource Management Report. The legislative directive was ambitious in both scope and complexity, requiring an evaluation of the infrastructure, policies, programs, and investments necessary to achieve a modeled 90 percent diversion of municipal solid waste.

The report provides valuable analysis regarding the scale of changes that would be required to substantially increase diversion across Minnesota. However, because the report explicitly states that the 90 percent diversion scenario is “not a mandated target, but rather an analytical framework used to understand the scale of system changes, investments, and policy approaches that would be required to achieve such an outcome,” the report should more clearly state that it is not intended to serve as a planning document or policy recommendation. Without that distinction, the analytical scenarios presented throughout the report may be interpreted as preferred policy direction rather than an evaluation of a hypothetical future system.

Preserve Minnesota’s Statutory Waste Hierarchy

Olmsted County operates one of Minnesota’s most comprehensive integrated solid waste management systems and has made long-term investments based on the waste management hierarchy established by the Minnesota Legislature through the Waste Management Act. That hierarchy intentionally distinguishes resource recovery from land disposal and places resource recovery above landfilling because it recovers both energy and materials while reducing reliance on permanent disposal¹.

¹ Minnesota Statute § 115A.02(b), <https://www.revisor.mn.gov/statutes/cite/115A.02>.

The Resource Management Report effectively collapses resource recovery and land disposal into a single category when evaluating future management scenarios. Olmsted County believes this represents a significant departure from Minnesota's longstanding statutory framework.

Resource recovery and land disposal are fundamentally different management methods. Modern waste-to-energy facilities:

- reduce waste volume requiring final disposal by approximately 90 percent;
- recover ferrous and non-ferrous metals from combustion ash;
- generate useful energy from residual waste; and
- continue to demonstrate strong environmental performance through advanced emission control technologies.

Recent research also continues to demonstrate the capability of modern waste-to-energy facilities to effectively destroy emerging contaminants, including per- and polyfluoroalkyl substances (PFAS)², while maintaining emissions well below permitted limits.

By comparison, landfills permanently store waste, generate leachate requiring long-term management, produce landfill gas emissions over decades³, and recover comparatively little usable energy. Although modern landfills are an essential component of Minnesota's waste management system, they remain a disposal technology rather than a resource recovery technology.

Olmsted County respectfully requests that the final report preserve the distinction established in Minnesota statute and continue to recognize resource recovery as preferable to land disposal.

Acknowledge the Limits of Infrastructure Alone

Olmsted County has invested hundreds of millions of dollars over several decades to implement the full intent of Minnesota's waste hierarchy. These investments include extensive public education, recycling programs, household hazardous waste collection, yard waste and organics management, the Olmsted County Waste-to-Energy Facility, and the construction of a new \$50 million Materials Recovery Facility scheduled to begin operation in 2027.

² U.S. Environmental Protection Agency. *Characterization of Per- and Polyfluoroalkyl Substances in the Emissions from a Municipal Waste-to-Energy Facility and the Destruction of Hexafluoroethane*. EPA 600/R-25/273. Office of Applied Science and Environmental Solutions, June 2026.

³ Florentino B. De la Cruz, et al., "Nationwide Estimate of Volatile Per- and Polyfluoroalkyl Substance (PFAS) Emissions from U.S. Landfills via Landfill Gas," *Environmental Science & Technology* 59 (2025): 24899–24908, <https://doi.org/10.1021/acs.est.5c08763>.

Despite these substantial investments, the County's experience demonstrates the practical limitations of diversion. Waste composition studies conducted every five years as required by the Waste-to-Energy Facility operating permit consistently indicate that approximately 10 percent of the remaining waste stream consists of materials recoverable through traditional materials recovery operations, while roughly 20 percent consists of food waste and other organics.

Even under the unrealistic assumption that these above mentioned recyclable materials and food scraps could be recovered, the County's overall diversion rate would increase only to approximately 58 percent.

This real-world experience demonstrates that infrastructure alone cannot achieve a 90 percent diversion rate. Continued improvements will require changes in product design, packaging, consumer purchasing decisions, participation rates, contamination reduction, and material markets. **Human behavior remains one of the most significant factors influencing diversion success and deserves substantially greater attention throughout the report.**

Provide a More Balanced Discussion of Environmental Impacts

Olmsted County appreciates the report's comprehensive evaluation of contaminants associated with waste management facilities. Understanding and minimizing environmental and public health impacts is essential.

However, the report devotes considerable attention to contaminants associated with managing discarded products while providing comparatively little discussion of contaminants present during product manufacture, consumer use, and the broader product lifecycle. Waste management represents only one stage of a much larger system.

A more balanced discussion would acknowledge that reducing environmental impacts ultimately depends not only on improving waste management infrastructure but also on designing safer products, reducing hazardous constituents, and preventing waste generation in the first place.

Recognize the Practical Challenges of Achieving 90 Percent Diversion

The report appropriately identifies the substantial infrastructure investments required to approach a 90 percent diversion scenario. However, it understates the practical challenges associated with achieving that level of diversion.

Olmsted County's operational experience demonstrates that even highly developed integrated systems encounter diminishing returns as diversion rates increase. Each

additional percentage point of diversion requires progressively greater investments in infrastructure, education, collection systems, processing capacity, and public participation.

This experience is consistent with international performance. Even countries recognized as global leaders in recycling and resource management generally report diversion rates substantially below 90 percent while continuing to rely on resource recovery as an important component of integrated waste management systems⁴.

The report should therefore place greater emphasis on the practical limitations associated with consumer behavior, market development, product design, and long-term funding rather than implying that infrastructure expansion alone can achieve the modeled diversion scenario.

Interpret Environmental Modeling Carefully

The report's ecological assessment concludes that the modeled diversion scenarios produce relatively modest overall ecological improvements despite significant increases in infrastructure investment. Rather than substantially reducing environmental burden, the scenarios primarily redistribute facilities geographically (page 162).

Similarly, while the report indicates reductions in facility proximity for the most vulnerable communities, it also demonstrates increased facility presence in other communities.

These findings warrant additional discussion because they suggest that significant public investment may result in relatively modest statewide environmental gains while redistributing, rather than eliminating, environmental burdens.

Support Extended Producer Responsibility While Recognizing Uncertainty

Olmsted County supports continued efforts to reduce waste generation through product redesign, waste prevention, reuse, and Extended Producer Responsibility (EPR). Well-designed EPR programs have the potential to improve packaging, strengthen recycling markets, and shift responsibility upstream to product manufacturers.

However, many aspects of Minnesota's future EPR framework—including reimbursement methodologies, producer participation, statewide consistency, administrative structure, and long-term funding—remain under development.

Accordingly, the report should acknowledge the uncertainty associated with relying on future EPR systems to achieve modeled diversion rates while recognizing that a diverse

⁴ European Environment Agency, *Waste recycling in Europe*, December 3, 2025.
<https://www.eea.europa.eu/en/analysis/indicators/waste-recycling-in-europe>

and resilient waste management infrastructure will continue to be necessary regardless of future policy changes.

Conclusion

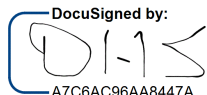
Olmsted County supports Minnesota's continued efforts to reduce waste generation, expand reuse and recycling, strengthen producer responsibility, and increase diversion from disposal. The County also appreciates the substantial work invested by the MPCA in developing this report.

However, the County believes the final report would be strengthened by:

- clearly identifying the report as an analytical exercise rather than a policy or planning document;
- preserving Minnesota's statutory waste hierarchy by maintaining the distinction between resource recovery and land disposal;
- placing greater emphasis on the practical limitations associated with human behavior, product design, and market development;
- recognizing that resource recovery remains an essential component of an integrated waste management system; and
- acknowledging that achieving meaningful long-term diversion will require a diverse portfolio of waste management infrastructure rather than reliance on any single strategy.

Olmsted County has invested—and continues to invest—substantial public resources to advance Minnesota's waste hierarchy and protect the state's land, water, air, and public health. The County values its longstanding partnership with the MPCA and looks forward to continued collaboration to strengthen Minnesota's integrated solid waste management system.

Sincerely,

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David Senjem, Chair

Olmsted County Board of Commissioners

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