STATE OF MICHIGAN

JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

June 27, 2001

Mr. Kenneth E. Lautzenheiser, Chairperson
Hillsdale County Board of Commissioners
Hillsdale County Courthouse, 2nd Floor
29 North Howell Street
Hillsdale, Michigan 49242

Dear Mr. Lautzenheiser:

The Department of Environmental Quality (DEQ) received the locally approved update to the Hillsdale County Solid Waste Management Plan (Plan) on November 13, 2000. Except for the items indicated below, the Plan is approvable. As outlined in the February 26, 2001 letter to you from Ms. Lynn Dumroese, DEQ, Waste Management Division, and as confirmed in your letter dated April 19, 2001, the DEQ makes the following modifications to the Plan:

On page III-4, Table 2-A authorizes exports of Hillsdale County (County) waste to Ohio and Indiana. The Plan cannot regulate interstate transfer of waste; therefore, in order to alleviate any discrepancy, reference to Ohio and Indiana in the Current Export Authorizations Table is deleted from the Plan.

On page III-46, the first paragraph in the Local Ordinances and Regulations Section states the County has demonstrated sufficient capacity in surrounding counties; therefore, landfill development is prohibited and any local ordinance governing landfill development and operation shall not be enforceable. The Plan previously states in the Authorized Disposal Area Types Section that sufficient capacity is available and no disposal facilities shall be sited during this planning period. The Authorized Disposal Area Types Section is the correct location for that information. The Local Ordinances and Regulations Section of the Plan should not contain information regarding which disposal facilities are prohibited from being sited. Further, Section 11538(8) of Part 115, Solid Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Part 115), preempts enforcement of all local regulation of disposal area location, development, and operation except to the degree approved by the DEQ as part of the Plan. As written, the second sentence in this paragraph is overly broad in scope and may conflict and interfere with the DEQ's regulatory authority and responsibilities under Part 115. For the reasons mentioned above, this paragraph is deleted from the Plan.

On page III-46, the second paragraph states local governmental zoning regulations applicable to transfer centers and recycling centers may be adopted and implemented without further authorization or formal amendment to the Plan. Transfer facilities are disposal areas, and the DEQ will not approve the inclusion of local zoning authorizations in solid waste management plans that may provide for discretionary local decision making or, as previously mentioned, that may interfere with or conflict with Part 115 and the DEQ's regulatory responsibilities regarding disposal facilities. Therefore, this paragraph is deleted from the Plan.

With these modifications, the County's updated Plan is hereby approved and the County now assumes responsibility for the enforcement and implementation of this Plan. Please ensure that a copy of this letter is included with copies of the approved Plan distributed by the County.

By approving the Plan with modifications, the DEQ has determined that it complies with the provisions of Part 115 and the Part 115 administrative rules concerning the required content of solid waste management plans. Specifically, the DEQ has determined that the Plan identifies the enforceable mechanisms that authorize the state, a county, a municipality, or a person to take legal action to guarantee compliance with the Plan, as required by Part 115. The Plan is enforceable, however, only to the extent the County properly implements these enforceable mechanisms under applicable enabling legislation. The Plan itself does not serve as such underlying enabling authority, and DEQ approval of the Plan neither restricts nor expands County authority to implement these enforceable mechanisms.

The Plan may also contain other provisions that are neither required nor expressly authorized for inclusion in a solid waste management plan. The DEQ approval of the Plan does not extend to any such provisions. Under Part 115, the DEQ has no statutory authority to determine whether such provisions have any force or effect.

The DEQ applauds your efforts and commitment in addressing the solid waste management issues in Hillsdale County. If you have any questions, please contact Ms. Rhonda Oyer Zimmerman, Chief, Solid Waste Management Unit, at 517-373-4750.

Sincerely,

Russell J. Harding
Director
517-373-7917

cc: Senator Philip E. Hoffman
Representative Steven Vear
Mr. Arthur R. Nash Jr., Deputy Director, DEQ
Mr. Timothy R. Sowton, Legislative Liaison, DEQ
Mr. Jim Sygo, DEQ
Ms. Joan Peck, DEQ
Mr. Jon Russell, DEQ – Jackson
Ms. Rhonda Oyer Zimmerman, DEQ
Ms. Lynn Dumroese, DEQ
Hillsdale County File

Hillsdale County
Board of Commissioners

Hillsdale County Courthouse, 2nd Floor
29 North Howell Street
Hillsdale, Michigan 49242

WASTE MANAGEMENT DIVISION
NOV 13 2000
RECEIVED

Commissioners
Kenneth Lautzenheiser, Chair
Robert Null, Vice-Chair
David Steel
Tom Warzecha
Alice Britton

November 6, 2000

Ms. Lynn Dumroese
Solid Waste Management Planning Unit
Solid Waste Program Section
Waste Management Division
Department of Environmental Quality
P O Box 30241
Lansing, MI 48909

Dear Ms. Dumroese:

Enclosed, please find a copy of the Hillsdale County Solid Waste Management Plan. We submit this plan to you with a request for its final approval by the Director of the Michigan Department of Environmental Quality. As of this date, the plan has been approved by 19 of Hillsdale County's 27 local units of government, and hereby meets the criteria for approval and submittal of the plan to the Department of Environmental Quality.

We appreciate your review of our preliminary plan and the assistance you provided. Your recommendations were incorporated in this final plan.

Should you have any questions, please do not hesitate to call.

Sincerely,

Kenneth E. Lautzenheiser

Kenneth Lautzenheiser, Chairman

Enclosure

HILLSDALE COUNTY

Final

1998 SOLID WASTE MANAGEMENT PLAN UPDATE

May 24, 2000

AS REQUIRED BY SECTION 11539a OF
PART 115, SOLID WASTE MANAGEMENT, OF
THE NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION ACT
1994 PA 451, AS AMENDED

Hillsdale County Board of Commissioners
Kenneth E. Lautzenheiser, Chair

Hillsdale County Solid Waste Management Planning Committee
Richard Wunsch, Chair

Hillsdale County Board of Commissioners

Alice M. Britton
Kenneth E. Lautzenheiser, Chair
Robert D. Null, Vice Chair
David T. Steel
Tom Warzecha

Hillsdale County Solid Waste Planning Committee

Environmental Interest Group
Bev Brown
Richard Wunsch

Solid Waste Industry
John Bebeau
Doug Kinnett
Bill Lee
Duane Sanborn

General Public
Christy Cook
Jack McLain
Gary Noblet

Industrial Waste Generator
Curt Shaneour

County Government
David Steel

Township Government
Phil Mosher

City Government
Deb Sikorski

Regional Solid Waste Planning Agency
Charles Reisdorf

1997 PLAN UPDATE COVER PAGE

The Natural Resources and Environmental Protection Act, PA 451, as amended (NREPA), Part 115, Solid Waste Management, and its Administrative Rules, requires that each County have a Solid Waste Management Plan Update (Plan) approved by the Michigan Department of Environmental Quality (DEQ). Section 11539a requires the DEQ to prepare and make available, a standardized format for the preparation of these plan update. This document is that format. The Plan should be prepared using this format without alteration. Please refer to the document entitled "Guide to Preparing the Solid Waste Management Plan Update" for assistance in completing this Plan format.

DATE SUBMITTED TO THE DEQ: September 1, 2000 (anticipated)
If this Plan includes more than a single County, list all counties participating in this Plan.

Hillsdale County.

The following lists all the municipalities from outside the County who have requested and have been accepted to be included in the Plan, or municipalities within the County that have been approved to be included in the Plan of another County according to Section 11536 of Part 115 of the NREPA. Resolutions from all involved County boards of commissioners approving the inclusion are included in Appendix E.

Not applicable.

DESIGNATED PLANNING AGENCY PREPARING THIS PLAN UPDATE:

Hillsdale County Board of Commissioners.

CONTACT PERSON: Kenneth Lautzenheiser, Chairman, Hillsdale County Board of Commissioners

ADDRESS: 2nd Floor, Courthouse
Hillsdale, MI 49242

PHONE: (517) 437-3932 **FAX:** (517) 437-3138
EMAIL:

CENTRAL REPOSITORY LOCATION(S): 1. Hillsdale County Courthouse, Board of Commissioners Office, 2nd Floor, 29 North Howell Street, Hillsdale, Michigan, 49242; 2. Mitchell Public Library, 22 Manning, Hillsdale, Michigan, 49242; and 3. Hillsdale County Clerk's Office, Hillsdale County Courthouse, 29 N. Howell Street, Hillsdale, Michigan, 49242; 4. Region 2 Planning Commission, 120 W. Michigan Avenue, Jackson, Michigan, 49201.

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EXECUTIVE SUMMARY

The following summarizes the solid waste management system selected to manage solid waste within Hillsdale County. In case of conflicting information between the executive summary and the remaining contents of the Plan update, the information provided in the main body of the Plan update found on the following pages will take precedence over the executive summary.

Process used to develop and approve plan update. The Hillsdale County Solid Waste Management Planning Committee and the Hillsdale County Board of Commissioners acting as the designated planning agency directed preparation of the plan update to be based upon the Hillsdale County Solid Waste Management Plan prepared in December, 1991. Components of the 1991 plan were updated and incorporated in the plan format for preparing county solid waste management plans established by the Michigan Department of Environmental Quality. The Hillsdale County Solid Waste Management Planning Committee met and prepared the plan update based upon the format in a series of meetings which were open to the public. The plan was prepared in accordance with state law and regulations established by the Michigan Department of Environmental Quality.

Problems with plan preparation. In instances where the 1991 Solid Waste Management Plan for Hillsdale County did not provide sufficient information to prepare the plan update, the Solid Waste Management Planning Committee discussed these issues until a consensus was obtained.

OVERVIEW OF THE COUNTY

Township or Municipality Name	Population[1]	% Land Use[3]		% of Economic Base[2]				
		Rural	Urban	Ag	For	Ind	Com	Oth
Hillsdale County	46,240	97%	3%	8%	0%	32%	14%	46%

* Ag=Agriculture; For = Forestry; Ind = Industry; Com = Commercial; Oth = All Other Economic Bases
Additional listings, if necessary are listed on an attached page.

Population. According to estimates of the Michigan State Demographer, Hillsdale County's 1997 population is estimated to be 46,240. This is an increase of 2,809 persons over the 1990 census figure of 43,431. This increase is the continuation of a trend of population growth within the County. In each of the decades since 1930, the County has experienced fairly stable growth. The County's population is projected to increase steadily to total 51,580 by the year 2020.

1. Michigan Information center, Michigan Department of Management and Budget, 1997 Estimate
2. County Business Patterns, 1995, based upon numbers of employees
3. MIRIS, 1977

35% of Hillsdale's population resides within cities and villages. The largest city, the City of Hillsdale, is located in the geographic center of the County and it had a 1990 population of 8,170. Smaller urban ceners include the Village of Jonesville with 2,283 persons; the City of Litchfield with 1,317 persons; and the City of Reading with 1,112 persons. The remaining five villages contain fewer than 600 persons each. Between 1980 and 1990, relative to the County as a whole, significant growth occurred in the City of Hillsdale, the Village of Jonesville, and the Townships of Adams, Jefferson, Reading, Scipio, and Somerset.

Land Use. Land use data is available through the Michigan Resource Inventory System (MIRIS). The data reveals that in 1978, Hillsdale County's land cover was approximately 3% urban and 97% non-urban. Most of the County's land, 71%, was in use for agriculture; while 16% was forested; 5% was designated open lands; and another 5% wetlands, lakes, and rivers. Within the urban category, most of the land, 63% was residential. Evidence exists that since 1978, a substantial amount of the County's land has been converted from agricultural to other land uses. The census of agriculture reveals that between 1982 and 1992, 33,073 acres, or 8.5% of the total land area of the County, was converted from agricultural lands to other land uses.

Economy. Based upon 1993 data available through the Bureau of Economic Analysis, U.S. Department of Commerce, Hillsdale County's employment numbered 19,109. Data is provided on the number of employees for various categories including: farming; agriculture and forestry; mining; construction; manufacturing; transportation and public utilities; wholesale trade; retail trade; finance, insurance, and real estate; services; and government. Of these eleven categories, the greatest number of employees, 6,023 or 32%, work in the area of manufacturing, 20% work in services, 14% work in retail trade, 12% work in government, and 8% work in farming. The remaining categories have 4% or fewer employees. Data for the period of time between 1990 and 1993 indicates that service employment is increasing substantially, retail trade employment is increasing slightly, and there are slight declines in farming, wholesale trade, and government employment.

CONCLUSIONS

Hillsdale County has decided to continue to rely on the exportation of solid waste to the Williams County Landfill located near Bryan, Ohio, and to enhance its recycling and waste reduction capabilities. This alternative was selected based upon an analysis of alternative arrangements with varying options.

The following alternatives and their options were considered by the Hillsdale County Solid Waste Management Planning Committee and the Board of Commissioners:

Alternative 1--Status Quo

Alternative 2--Recycling/Landfilling
- Option A--Out of county landfill
- Option B--New multi-county landfill outside Hillsdale County
- Option C--New multi-county landfill inside Hillsdale County

Alternative 3--Resource Recovery/Landfilling
- Option A--Out of county landfill
- Option B--New multi-county landfill outside Hillsdale County
- Option C--New multi-county landfill inside Hillsdale County

Alternative 4--Landfill
- Option A--Out of county landfill
- Option B--New multi-county landfill outside Hillsdale County
- Option C--New multi-county landfill inside Hillsdale County

Each of these four alternatives, and the options for landfill location considered for the alternatives were evaluated on the basis of eight criteria which included considerations regarding public health, environmental impact, access to land and transportation, energy consumption, natural resources conservation, public acceptability, technical feasibility, and economic feasibility. A point system was applied to arrive at a rational comparison between each of the alternatives and their landfill location options.

SELECTED ALTERNATIVES

As noted above, the alternative for solid waste disposal selected by Hillsdale County, and that which was determined to be the best alterative based upon the application of the evaluation system described above, was alternative two, Option A. This alternative makes use of enhanced recycling and waste reduction processes and landfilling to dispose of waste which cannot be easily recycled or eliminated through waste reduction. Reduction will be accomplished through the recycling of wastes. Hillsdale County currently has six transfer stations which have, or are capable of, recycling capability. Waste is delivered by residents to these facilities and recycling

is, or can easily be made a component of the waste disposal process. Within the City of Hillsdale, waste is collected from residences under contract to a specific hauler. It is possible within the city to develop a source separation program to implement recycling. A similar source separation program is possible for implementation with solid waste haulers serving the balance of the county.

Waste that cannot be recycled is disposed in landfills located outside Hillsdale County. Hillsdale County has no Type II or Type III waste disposal landfills within its borders. Almost all of Hillsdale County's Type II waste that cannot be recycled is disposed in the Williams County Landfill located north of Bryan, Ohio. This landfill has indicated the capacity to accept Hillsdale County waste for a period exceeding ten years. Small amounts of Hillsdale County Type II waste are disposed in landfills in surrounding counties. In addition, Type III disposal facilities are also offered in landfills surrounding Hillsdale County.

Alternative two which focuses on waste reduction and recycling, and Option A which makes use of the landfill in Bryan, Ohio as the primary disposal site for wastes that cannot be recycled, was rated highest in the following evaluation criteria: public health, environmental impact, economic feasibility, the political acceptability component of public acceptability criteria, materials recovery and composting in the natural resources conservation criteria, and in land area required and road improvements required as a part of the access to land and transportation criteria. The only weaknesses to this alternative were lack of central location, higher energy consumption associated with collection and transportation of waste, and energy recovery.

INTRODUCTION

GOALS AND OBJECTIVES

The Plan is formulated to provide guidance and direction toward the achievement of the following goals which have been identified by the Hillsdale County Solid Waste Management Planning Committee, and which help achieve State goals for waste reduction, reuse, composting, recycling, waste-to-energy, and landfilling.

Goal 1: ***To establish a countywide Solid Waste Management Plan and program which promotes the optimum utilization of solid waste disposal techniques: waste reduction; resource and energy recovery; provides for meeting Hillsdale County's sanitary landfill needs; satisfies adopted regulatory standards for proper solid waste management practices; and protects the public health and safety.***

Objective 1a: Keep the public informed of the solid waste options.

Objective 1b: Develop an efficient, environmentally sound and cost-effective waste management system capable of meeting the diverse needs of Hillsdale County for the next 10 years.

Objective 1c: Look toward a multi-county approach in solid waste disposal to efficiently utilize Hillsdale County's resources.

Objective 1d: Encourage the cooperative use of existing solid waste facilities and services, and the coordination of collection activities by local governments and solid waste haulers.

Objective 1e: Site local disposal facilities in accordance with siting criteria identified in the Solid Waste Management Plan and compatible land use patterns, with review by the affected local units of government and insurance that disposal facilities are designed in accordance with Part 115, Solid Waste Management (Part 115), of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), and its rules.

Objective 1f: Encourage participation by the private sector in all solid waste management activities to maximize user participation and accessibility to the solid waste system.

Objective 1g: Encourage the implementation of an integrated waste management system, including waste reduction, source separation, materials recycling, energy recovery and landfilling.

Objective 1h: Promote governmental, institutional, commercial, and industrial recycling capabilities.

Objective 1i: Encourage the creation/expansion of markets for recycled and recovered materials and the use of recyclable and recycled materials by government, business, industry, and the public.

Objective 1j: Coordinate any future changes in the county waste management system with necessary changes in processing and collection methods.

Objective 1k: Encourage continued appropriate disposal of household hazardous waste.

Short Range Policies (1-5 Years):

1. Explore a private regional or multi-county landfill operation with surrounding counties in conjunction with a regional resource recovery project.

2. Encourage a Type II and a Type III landfill in Hillsdale County, if arrangements for out-of-county sites or facilities cannot be attained.

3. Establish office paper recycling programs in the county and City of Hillsdale government offices and promote a paper recycling program for the major corporate and public instructions in Hillsdale County.

4. Meet with potential developers/investors/operators of any proposed cogeneration project and discuss the feasibility of including municipal waste sources.

5. Develop and implement education programs about the best current technologies for waste reduction, source separation, recycling, resource recovery, and integrated waste management for Hillsdale County.

6. Encourage the use of private/non-profit organizations for operating and coordinating formal efforts in recycling and resource recovery.

7. Review local government and public institution procurement policies and suggest revision of them as necessary to encourage the use of recycled and recyclable materials.

8. Assign the responsibility of overseeing municipal and township solid waste practices and use of waste disposal facilities in accordance with Part 115, Solid Waste Management (Part 115), of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), and its rules, and the Implementation Section of the Solid Waste Management Plan.

9. Retain the concept of a transfer station system within the county whereby low volume transfer stations are distributed throughout the county to serve specified areas or 'districts'.

10. Assign within the county, the responsibility of overseeing the implementation of these short-range and long-range policies in accordance with the adopted Solid Waste Management Plan.

11. Annually review these objectives and policies.

Long-Range Policies (5-10 Years):

1. Identify alternate landfill sites in Hillsdale County or surrounding counties.

2. Investigate the feasibility of financial incentives and/or legal enforcement for source separation of recyclable materials at the home and disposal site (i.e., variable fee structure for separation of paper, glass, metals, etc., or a mandatory curbside source separation ordinance).

3. Support an economically sound rural collection program in conformance with an adopted countywide regional disposal plan.

4. Expand and support voluntary efforts which will encourage the formal use of other feasible non-landfilling alternate solid waste systems.

5. Encourage new or innovative workable energy and materials recovery technologies.

6. Encourage appropriate and cost-effective local, state and federal legislation to provide incentives for source separation, recycling and packaging practices.

7. Endorse feasible long-range regional resource recover/recycling/disposal plans.

8. Assign within the county the responsibility of overseeing the implementation of the adopted Solid Waste Management Plan (in conjunction with short-range Policy no. 10).

9. Completely update this Solid Waste Management Plan every five years.

DATA BASE

Identification of sources of waste generation within the county, total quantity of solid waste generated to be disposed, and sources of information.

The following estimates of solid waste generation are based upon estimates of waste generation recognized by the Solid Waste Association of North America (SWANA). SWANA estimates that on average, three pounds of waste are disposed of per capita per day, assuming no yard wastes are included. SWANA also estimates that industrial solid waste generation, which includes food waste, rubbish, and special wastes amount to 1.9 pounds per person per day.

The Solid Waste Committee attempted to obtain data on the actual amount of waste disposed at the Williams County Landfill in Bryan, Ohio. The operator of the landfill, Tri-State Waste, Inc. (formerly Laidlaw, Inc.), expressed reluctance to provide this data due to the possible competitive advantage that may result should their competitors obtain this data. Landfill facilities in Michigan have reported this type of data to the Department of Environmental Quality (MDEQ). This data has been made available to Michigan counties preparing solid waste management plans. Data for facilities outside the state of Michigan are not available through the MDEQ. Therefore, the actual amount of Hillsdale County solid waste disposed in landfill facilities, cannot be confirmed.

In discussion, however, the Solid Waste Management Planning Committee felt comfortable with the generation rates estimated by SWANA, and directed their use in the updated plan. Estimates based on an average waste generation rate of 3.0 pounds per person per day are included in the following table.

WASTE TYPE	CURRENT (1998) ANNUAL VOLUME (IN TONS)	FIVE-YEAR (2005) ANNUAL VOLUME (IN TONS)	TEN-YEAR (2010) ANNUAL VOLUME (IN TONS)
Residential/ Commercial	25,737	27,351	27,170
Industrial	20,141	20,714	21,972
Fly ash/scrubber[1] sludge	0	0	0
Municipal Sludge[2]	0	0	0
Construction/Demo-lition	10,300	10,592	10,874
Street Sweepings	627	644	662
Agricultural	3,564	3,665	3,762
Wood Industries	5,522	5,679	5,830
Total	65,892	68,645	70,270

[1] Power Plant fly ash and scrubber sludge is sold to a cement plant, and gypsum is land applied in Ohio.
[2] Municipal sludge is land applied.

TOTAL QUANTITY OF SOLID WASTE GENERATED - 65,892 tons (1998)

TOTAL QUANTITY OF SOLID WASTE NEEDING DISPOSAL - 62,328

The solid waste needing disposal is significantly reduced from the total solid waste generated due to recycling, reuse, field application of municipal sludge, alternative disposal of construction and demolition materials, and the State of Michigan's ban on disposal of yard waste in landfills.

Inventory and description of all solid waste disposal areas within Hillsdale County or to be utilized by Hillsdale County to meet its disposal needs for the planning period.

The following facilities are anticipated to process the majority of Hillsdale County's solid waste within the 10-year planning period. Both in-county and out-of-county facilities are considered.

Hillsdale County Facilities

Hillsdale County has no Type II or Type III landfills which are active.

City of Hillsdale Transfer Facility - The City of Hillsdale Transfer Facility, a privately operated transfer and recycling facility owned by the City of Hillsdale receives waste from county residents. Waste which is not recycled is shipped to the Williams County Landfill in Bryan, Ohio. The transfer facility is located in the City of Hillsdale along M-99 between Jonesville and Hillsdale. The facility is operated by Tri-State Waste, Inc. (formerly Laidlaw, Inc.).

Jefferson Township Transfer Facility - The Jefferson Township Transfer Facility is located southeast of the City of Hillsdale. The facility receives waste from Jefferson Township residents and offers recycling.

Other transfer facilities - Waste disposal facilities are offered in four other locations in Hillsdale County open to the public during specified times of the month. These facilities are primarily temporary, being set up, used, and removed after disposal services are offered. They are located in Camden Township, Ransom Township, Reading Township, and Scipio Township.

Out-of-County Facilities

Williams County Landfill - Almost all of Hillsdale County's Type II waste that is not recycled is disposed in the Williams County Landfill located near Bryan, Ohio. Officials of the Bryan, Ohio facility indicate they have an estimated seventy (70) years of life remaining at their facility.

Adrian Landfill - A small amount of Hillsdale County's Type II waste, almost 1,100 cubic yards in 1997 was disposed of in the Adrian landfill located in Lenawee County. It is anticipated that small amounts will be sent to this facility in the future, provided appropriate authority exists in the Lenawee County Solid Waste Plan. Approximately 20 acres of the site is currently used for disposal while an additional 20 acres has received state and local approvals for expansion.

C & C Landfill - The C & C Landfill located in Calhoun County also receives a small amount of Type II waste from Hillsdale County. In 1997, 3,567 cubic yards were exported to the facility. The C & C Landfill almost received 7,230 cubic yards of Type III waste from Hillsdale County at its Type III Facility.

Philip McGill Landfill - A small amount of Hillsdale County's Type II waste is exported to the Philip McGill Landfill located in Jackson County. 1,600 cubic yards were exported to the facility in 1997.

Liberty Environmentalist Type III Landfill - The Liberty Environmentalist Landfill, a Type III facility, receives a small amount of waste from Hillsdale County. In 1997, 6,500 cubic yards were exported to the facility from Hillsdale County.

National Serv-All Landfill - The National Serv-All Landfill located in Ft. Wayne, Indiana received a small amount of Hillsdale County type II waste. Volume figures are not available. National Serv-All provides collection services to a very small number of residences in the southwest corner of the County.

City Environmental Services Landfill of Hastings - Although no solid waste is known to have been exported from Hillsdale County to the City Environmental Services Landfill of Hastings, the landfill is included as a facility to which solid waste may be exported per a request of City Environmental Services. No reciprocal offer or agreement is extended to Barry County to authorize the importation of Barry County waste with Hillsdale County.

Coldwater Transfer Station - A small amount of Hillsdale County waste may be exported to the Coldwater Transfer Station. This transfer station is acknowledged as a facility to which Hillsdale County waste may be exported.

Arbor Hills - Although no solid waste is known to have been exported from Hillsdale County to the Arbor Hills Landfill, the landfill is included as a facility to which solid waste may be exported per a request of Arbor Hills Landfill. No reciprocal offer or agreement is extended to Washtenaw County to authorize the importation of Washtenaw County waste with Hillsdale County.

DATA BASE

FACILITY DESCRIPTIONS

Facility Type: Type A Transfer Station

Facility Name: City of Hillsdale Transfer Station

County: Hillsdale Location: Town: 6S Range: 3W Section(s): 22

Map identifying location included in Attachment Section: __X__ Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Tri-State Waste, Inc., Williams County Landfill

Operating Status	Waste Types Received
__X__ open	__X__ residential
_____ closed	__X__ commercial
__X__ licensed	__X__ industrial
_____ construction permit	__X__ construction and demolition
_____ open, but closure	_____ contaminated soils
_____ pending	_____ special wastes*
	_____ other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	__10__ acres
Total area site for use:	__10__ acres
Total area permitted:	__10__ acres
Operating:	_____ acres
Not excavated:	_____ acres

Current capacity:	__52__ tons or cubic yards per day
Estimated lifetime:	_____ years
Estimated days open per year:	__312__ days
Estimated yearly disposal volume:	16,239 tons or cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type B Transfer Station

Facility Name: Camden Township Transfer Site

County: Hillsdale Location: Town: 8S Range: 4W Section(s): 9

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Tri-State Waste, Inc., Williams County Landfill

Operating Status	Waste Types Received
__X__open (Sat. 8-12:00)	__X__residential
_____closed	_____commercial
_____licensed	_____industrial
_____construction permit	_____construction and demolition
_____open, but closure	_____contaminated soils
_____pending	_____special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	__1__ acres
Total area site for use:	__1__ acres
Total area permitted:	__1__ acres
Operating:	__1__ acres
Not excavated:	_____ acres

Current capacity:	__12__cubic yards
Estimated lifetime:	_____ years
Estimated days open per year:	__52__days
Estimated yearly disposal volume:	__600__ cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type B Transfer Station

Facility Name: Jefferson Township Transfer Facility

County: Hillsdale Location: Town: 7S Range: 2W Section(s): 8

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Tri-State Waste, Inc., Williams County Landfill

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	_____commercial
_____licensed	_____industrial
_____construction permit	__X__construction and demolition
_____open, but closure	_____contaminated soils
_____pending	_____special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	__10__ acres
Total area site for use:	__10__ acres
Total area permitted:	_____ acres
Operating:	_____ acres
Not excavated:	_____ acres

Current capacity:	400.7 tons
Estimated lifetime:	__30__ years
Estimated days open per year:	__78__ days
Estimated yearly disposal volume:	2,670 cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type B Transfer Station

Facility Name: Ransom Township Transfer Station

County: Hillsdale Location: Town: 8S Range: 2W Section(s): 18

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Tri-State Waste, Inc., Williams County Landfill

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	_____commercial
_____licensed	_____industrial
_____construction permit	_____construction and demolition
_____open, but closure	_____contaminated soils
_____pending	_____special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	__3__ acres
Total area site for use:	__3__ acres
Total area permitted:	__3__ acres
Operating:	__3__ acres
Not excavated:	_____ acres

Current capacity:	__160__cubic yards
Estimated lifetime:	_____ years
Estimated days open per year:	__45__days
Estimated yearly disposal volume:	__1,600__ cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type B Transfer Station

Facility Name: Reading Township Transfer Station

County: Hillsdale Location: Town: 7S Range: 4W Section(s): 30

Map identifying location included in Attachment Section: __X__ Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Tri-State Waste, Inc., Williams County Landfill

Operating Status	Waste Types Received
__X__ open	__X__ residential
_____ closed	_____ commercial
_____ licensed	_____ industrial
_____ construction permit	_____ construction and demolition
_____ open, but closure	_____ contaminated soils
_____ pending	_____ special wastes*
	_____ other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	__1__ acres
Total area site for use:	__1__ acres
Total area permitted:	__1__ acres
Operating:	__1__ acres
Not excavated:	_____ acres

Current capacity:	__40__ cubic yards
Estimated lifetime:	_____ years
Estimated days open per year:	__52__ days
Estimated yearly disposal volume:	__720__ cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type B Transfer Station

Facility Name: Scipio Township Transfer Facility

County: Hillsdale Location: Town: 5S Range: 3W Section(s): 22

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: C & C Landfill

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	_____commercial
_____licensed	_____industrial
_____construction permit	_____construction and demolition
_____open, but closure	_____contaminated soils
_____pending	_____special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	2.24 acres
Total area site for use:	2.24 acres
Total area permitted:	2.24 acres
Operating:	2.24 acres
Not excavated:	_____ acres

Current capacity:	80 cubic yards
Estimated lifetime:	_____ years
Estimated days open per year:	52 days
Estimated yearly disposal volume:	2,600 cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type II Landfill

Facility Name: Williams County Landfill

County: Williams (Ohio) Location: Town: 1N Range: 2E Section(s): 35,36

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Tri-State Waste, Inc.

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	__X__contaminated soils
_____pending	__X__special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	614 acres
Total area site for use:	374 acres
Total area permitted:	160 acres
Operating:	58 acres
Not excavated:	101 acres

Current capacity:	22,505,000 cubic yards
Estimated lifetime:	86 years
Estimated days open per year:	307 days
Estimated yearly disposal volume:	168,850tons

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type II Landfill

Facility Name: Adrian Landfill

County: Lenawee Location: Town: 7,8 S Range: 4E Section(s): 6,7

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Great Lakes Waste Services

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	__X__contaminated soils
_____pending	__X__special wastes*
	__X__other:

- Explanation of special wastes, including a specific list and/or conditions:

  Asbestos and sludges per operating policy.

Site Size:

Total area of facility property:	421 acres
Total area site for use:	287 acres
Total area permitted:	40 acres
Operating:	19 acres
Not excavated:	20 acres

Current capacity:	2,002,000 cubic yards
Estimated lifetime:	6.8 years
Estimated days open per year:	307 days
Estimated yearly disposal volume:	97,731 tons

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Sanitary Landfill Type II and III

Facility Name: C & C Landfill

County: Calhoun Location: Town: 1S Range: 6W Section(s): 28

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Allied Waste Systems

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	__X__contaminated soils
_____pending	__X__special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

  Non-hazardous solid and semi-solid wastes, no hazardous or liquid wastes.

Site Size:

Total area of facility property:	__224__ acres	
Total area site for use:	_____ acres	
Total area permitted:	__154__ acres	
Operating:	__33__ acres	
Not excavated:	__21__ acres	Does not include Type III area as of 11-1-9

Current capacity:	3,360,000 airspace
Estimated lifetime:	__7__ years
Estimated days open per year:	__286__days
Estimated yearly disposal volume:	1,100,000cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type III Landfill

Facility Name: Liberty Environmentalists Landfill

County: Jackson Location: Town: 4S Range: 1W Section(s): 13

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:

_____ Public __X__ Private Owner: Liberty Environmentalists

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	_____contaminated soils
_____pending	__X__special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

  Shredder fluff, foundry sand

Site Size:

Total area of facility property:	285 acres
Total area site for use:	65 acres
Total area permitted:	15 acres
Operating:	7.5 acres
Not excavated:	40 acres

Current capacity:	400,000 tons or cubic yards
Estimated lifetime:	20 years
Estimated days open per year:	300 days
Estimated yearly disposal volume:	165,000 tons or cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type II Landfill

Facility Name: McGill Road Landfill

County: Jackson Location: Town: 2S Range: 1W Section(s): 24

Map identifying location included in Attachment Section: __X__ Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:

_____ Public __X__ Private Owner: Waste Management, Inc.

Operating Status	Waste Types Received
__X__ open	__X__ residential
_____ closed	__X__ commercial
__X__ licensed	__X__ industrial
_____ construction permit	__X__ construction and demolition
_____ open, but closure	_____ contaminated soils
_____ pending	__X__ special wastes*
	_____ other:

- Explanation of special wastes, including a specific list and/or conditions:

  Shredder fluff, foundry sand

Site Size:

Total area of facility property:	50.5 acres
Total area site for use:	50.5 acres
Total area permitted:	18.7 acres
Operating:	7.8 acres
Not excavated:	_____ acres

Current capacity:	740,000 tons or cubic yards
Estimated lifetime:	5 years
Estimated days open per year:	310 days
Estimated yearly disposal volume:	148,000 tons or cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Class B transfer station and compost facility

Facility Name: Irish Hills Transfer Station

County: Lenawee Location: Town: 5S Range: 2E Section(s): 7

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Great Lakes Waste Services, Adrian Landfill

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
_____licensed	_____industrial
_____construction permit	__X__construction and demolition
_____open, but closure	_____contaminated soils
_____pending	_____special wastes*
	__X__other: Compost

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	__3__ acres
Total area site for use:	__1.5__ acres
Total area permitted:	__3__ acres
Operating:	__3__ acres
Not excavated:	_____ acres
Current capacity:	_____ cubic yards
Estimated lifetime:	_____ years
Estimated days open per year:	__120__ days
Estimated yearly disposal volume:	__2,000__ cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Sanitary Landfill, Type II

Facility Name: Arbor Hills Landfill

County: Washtenaw Location: Town: 1S Range: 7E Section(s): 13, Salem Twp.

Map identifying location included in Attachment Section: ____Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:

_____ Public __X__ Private Owner: BFI Waste Systems of North America, Inc.

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
_____licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	__X__contaminated soils
_____pending	__X__special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

  Non-hazardous solid and semi-solid wastes, no hazardous or liquid wastes.

Site Size:

Total area of facility property:	936 acres
Total area site for use:	356 acres
Total area permitted:	217 acres
Operating:	113 acres
Not excavated:	104 acres

Current capacity:	30,500,000 airspace or 61.5 million cubic yds.
Estimated lifetime:	176 years
Estimated days open per year:	265 days
Estimated yearly disposal volume:	3,500,000

(if applicable)
Annual energy production:

Landfill gas recovery projects:	18 megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type II Landfill

Facility Name: City Environmental Services Landfill, Inc. of Hastings

County: Barry Location: Town: 3W Range: 8N Section(s): 6

Map identifying location included in Attachment Section: ____Yes __X__ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: U.S. Waste

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
__X__construction permit	__X__construction and demolition
_____open, but closure	__X__contaminated soils
_____pending	__X__special wastes*
	__X__other: Asbestos

- Explanation of special wastes, including a specific list and/or conditions:

  Foundry Sand, Fly Ash, Municipal wastewater sludges, trees and stumps.

Site Size:

Total area of facility property:	330 acres
Total area site for use:	330 acres
Total area permitted:	48 acres
Operating:	19.5 acres
Not excavated:	28.5 acres

Current capacity:	5,000,000 cubic yards
Estimated lifetime:	10+ years
Estimated days open per year:	308 days
Estimated yearly disposal volume:	175,000 tons

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Transfer Station

Facility Name: Coldwater Transfer Station

County: Branch Location: Town: 6S Range: 6W Section(s): 28

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: National Serv-All, Inc., Ft. Wayne, IN

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	_____contaminated soils
_____pending	_____special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	__2__ acres
Total area site for use:	__2__ acres
Total area permitted:	_____ acres
Operating:	_____ acres
Not excavated:	_____ acres
Current capacity:	_____ tons or cubic yards
Estimated lifetime:	_____ years
Estimated days open per year:	__300__days
Estimated yearly disposal volume:	_____tons or cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Landfill

Facility Name: National Serv-All

County: Allen, Indiana Location: Town: 30N Range: 12E Section(s): 30

Map identifying location included in Attachment Section: _____Yes __X__ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Republic, Inc.

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	__X__contaminated soils
_____pending	__X__special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

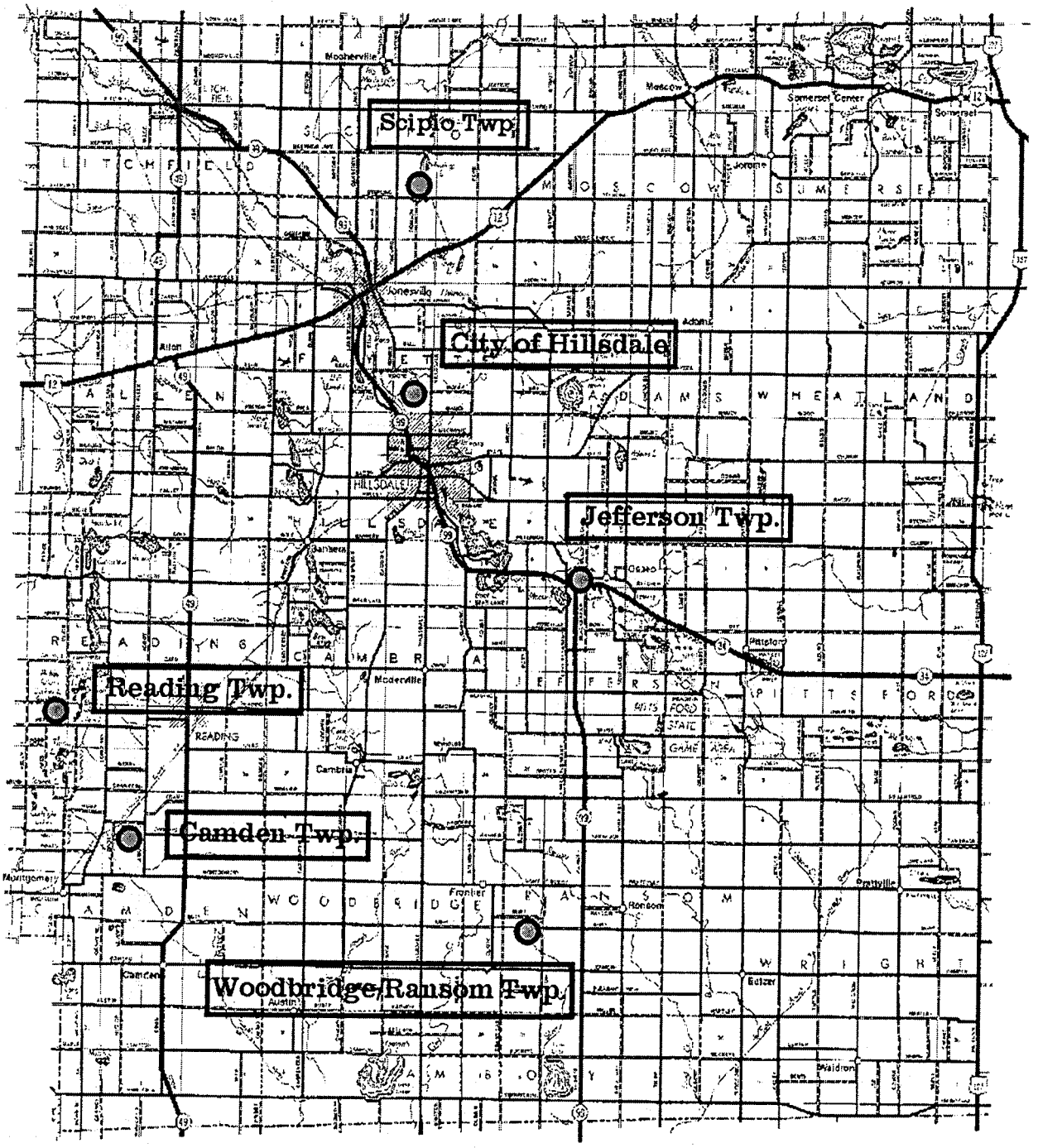
Site Size:

Total area of facility property:	440 acres
Total area site for use:	80 acres
Total area permitted:	80 acres
Operating:	30 acres
Not excavated:	50 acres

Current capacity:	4,875,000 tons or cubic yards
Estimated lifetime:	13 years
Estimated days open per year:	300 days
Estimated yearly disposal volume:	375,000 tons or cubic yards

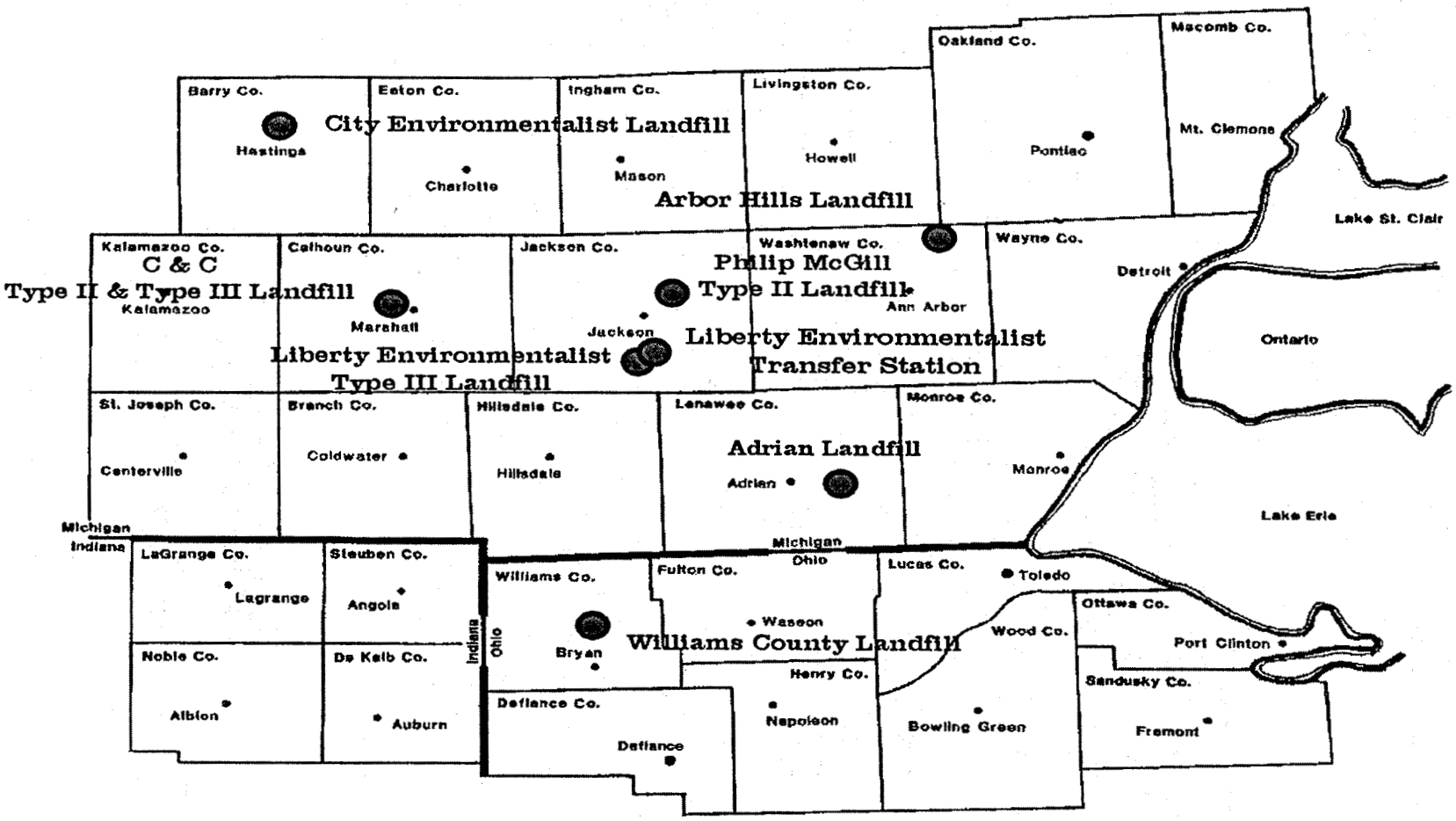
(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts



Existing Transfer Stations

Hillsdale County, Michigan



Solid Waste Facilities - Surrounding Counties

Hillsdale County, Michigan

DATA BASE

SOLID WASTE COLLECTION SERVICES AND TRANSPORTATION INFRASTRUCTURE

The following describes the solid waste collection services and transportation infrastructure that are utilized within the County to collect and transport solid waste.

Collection

The following table provides a list of Hillsdale County's licensed waste hauling providers, the type of service they provide, and the areas served:

Provider	Type of Service	Area Served in Hillsdale County
Tri-State Waste Services (Laidlaw)	Residential, Commercial Contractual Collection	Entire county City of Hillsdale
Town and County Rubbish Removal	Residential, Commercial	SW corner of Hillsdale County--Areas of Camden, Reading and Montgomery
BFI	Residential, Commercial	Litchfield, northwest area of County
National Serv-All	Residential	Southwest Hillsdale County

Waste collection in Hillsdale County is offered by two private carriers, Tri-State Waste Services (Laidlaw) and Town and Country Rubbish Removal. Collection services are offered throughout the County. No curbside recycling services are offered, however, recycling is available at the City of Hillsdale Transfer Station. Residential collection services within the City of Hillsdale are offered solely by Tri-State Waste Services on the basis of a contractual agreement with the City. Wastes are collected once per week.

DATA BASE

EVALUATION OF DEFICIENCIES AND PROBLEMS

The following is a description of problems or deficiencies in the existing solid waste system:

- The possible closure of a number of landfills in surrounding counties is likely to increase demands for an approved multi-county or regional landfill site.

- There are no current, definitive efforts to establish a landfill in the county. Without a licensed landfill, Hillsdale County is subject to political decisions made outside its boundaries.

- In the past, a primary problem in solid waste policy and decision-making has been a lack of cooperation among the municipalities of Hillsdale County. This situation has lead inefficiencies and a duplication of efforts in the provision of solid waste services and facilities.

- Private solid waste haulers in Hillsdale County have reported no problems at the Laidlaw operated City of Hillsdale transfer station. A problem could occur in some rural areas where private haulers are active in a single area under contract with the individual residents. This situation could result in overlapping routes and fuel waste, creates inefficiency, and in most cases could increase collection costs.

- Markets and market prices for recycling materials fluctuate, making it difficult to project costs and benefits associated with recycling.

- The incineration of the county's combustible wastes would require all of the recyclable combustible wastes to be incinerated as well, thus minimizing or eliminating recycling.

- Illegal dumping of refuse along county roads is a problem in Hillsdale County.

- In some areas of the County, there exists only one solid waste hauler service. This limits the range of negotiation possibilities for recycling at transfer stations in these areas.

DATA BASE

DEMOGRAPHICS

The following presents the current and projected population densities and centers for five and ten year periods, identification of current and projected centers of solid waste generation including industrial solid waste for five and ten year periods as related to the Selected Solid Waste Management System for the next five and ten year periods. Solid waste generation data is expressed in tons or cubic yards, and if it was extrapolated from yearly data, then it was calculated by using 365 days per year, or another number of days as indicated.

Population Projections

Hillsdale County's population is projected to increase 7.3% between 1990 and 2000. Increases of 2.8% are projected between 2000 and 2005, and 2.7% between 2005 and 2010 (see below).

Year	Population
1990	43,431 (actual)
1995	45,166 (estimated)
1997	46,240 (estimated)
2000	46,602 (projected)
2005	47,926 (projected)
2010	49,197 (projected)

The actual population figure for the county is from the 1990 U.S. Census. The estimates were made by the Michigan Department of Management and Budget (published in 1998). The source of the projected populations is also the MDMB (published in 1996).

Population Density

Hillsdale County had a population density of 71.5 persons/square mile in 1990. The density rose to 76.2 persons/square mile in 1997, and is expected to continue to rise to 78.9 in 2005, and 81.0 in 2010.

Population Distribution

Hillsdale County's population is centered in the north-central portion of the county along the M-99 corridor extending from, and including, the City of Hillsdale, the Village of Jonesville, and surrounding urban townships. This area contains 42% of the County's population. Seven smaller cities and villages are scattered around the County. These population centers contain 11% of the County's population. Somerset Township, which has substantial lake development and is experiencing rapid growth, has almost 9% of the County's population. The remaining areas of the County are comprised of townships of rural densities. Forty-one percent of the County's population reside within these townships.

Population figures for 1990 and 1996 estimates are contained in the following table:

POPULATION BY LOCAL UNIT OF GOVERNMENT
1990 AND 1996

	1990	1996	% CHANGE
Urban Core:			
City of Hillsdale	8,175	8,252	0.9%
Village of Jonesville	2,283	2,429	6.4%
Cambria Township	2,372	2,529	6.6%
Fayette Township	907	967	6.6%
Hillsdale Township	1,781	1,899	6.6%
Jefferson Township	3,083	3,287	6.6%
Subtotal - Urban Core	18,601	19,363	4.1%
% of total County Population	42.8%	42.2%	
Outlying Cities and Villages:			
Village of North Adams	512	532	3.9%
Allen Village	201	209	4.0%
Camden Village	482	513	6.4%
City of Litchfield	1,317	1,379	4.7%
Village of Montgomery	388	404	4.1%
City of Reading	1,127	1,177	4.4%
Village of Waldron	581	613	5.5%
Subtotal - Outlying Cities and Villages	4,608	4,827	4.8%
% of total County Population	10.6%	11.1%	
Lakes Townships:			
Somerset Township	3,416	3,876	13.5%
% of total County Population	7.9%	8.9%	

	1990	1996	% CHANGE
Rural Townships:			
Adams Township	1,827	1,948	6.6%
Allen Township	1,211	1,291	6.6%
Amboy Township	978	1,042	6.5%
Camden Township	1,114	1,188	6.6%
Litchfield Township	957	1,021	6.7%
Moscow Township	1,353	1,347	-0.4%
Pittsford Township	1,595	1,700	6.6%
Ransom Township	911	971	6.6%
Reading Township	1,768	1,884	6.6%
Scipio Township	1,479	1,577	6.6%
Wheatland Township	1,225	1,306	6.6%
Woodbridge Township	1,160	1,237	6.6%
Wright Township	1,228	1,309	6.6%
Subtotal - Rural Townships	16,806	17,821	6.0%
% of total County Population	38.7%	41.0%	
Hillsdale County Total	43,431	45,887	5.7%

Sources: 1990 population figures - U.S. Census
1996 population estimates - Michigan Department of Management and Budget

DATA BASE

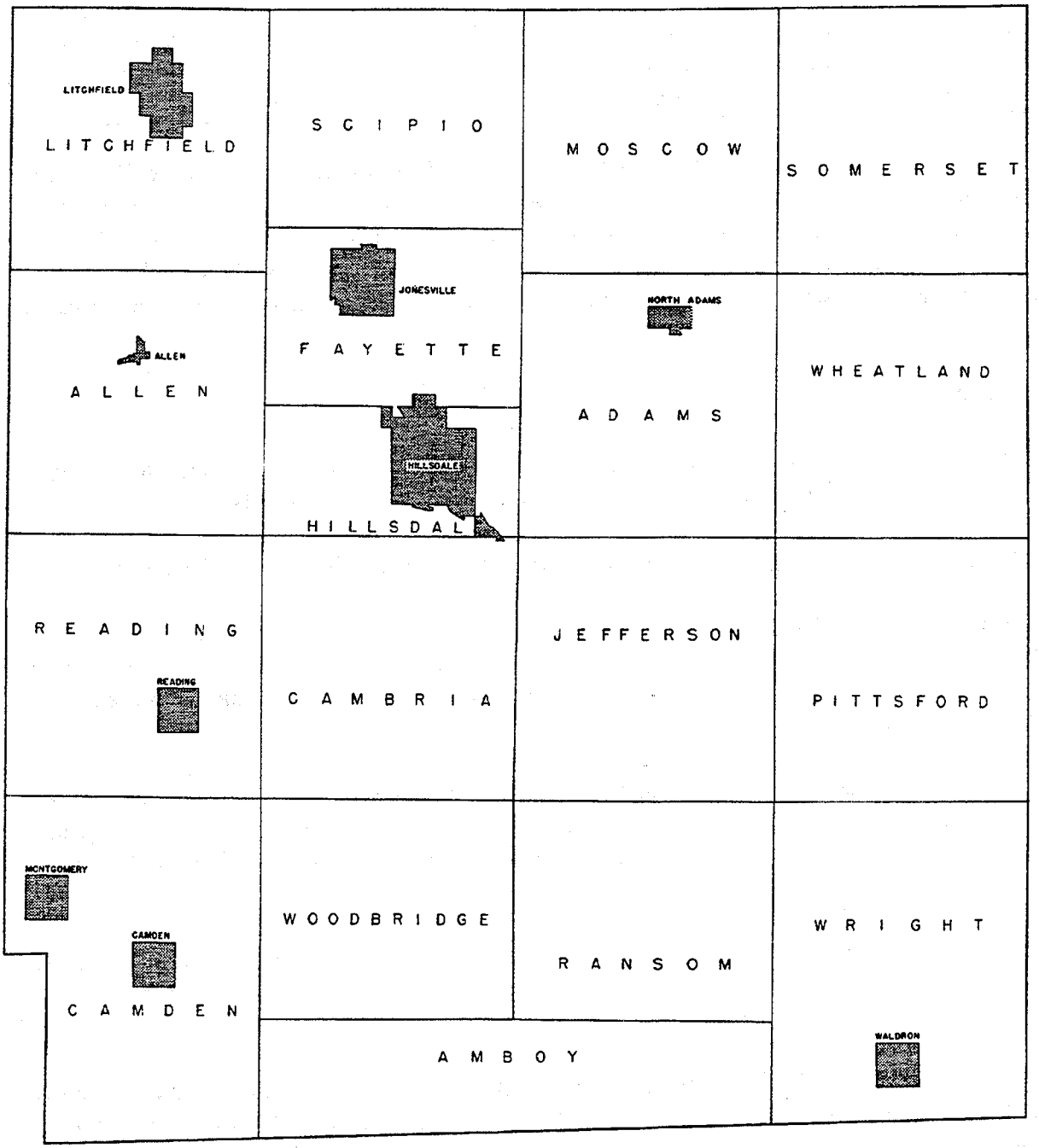
LAND DEVELOPMENT

The following describes current and projected land development patterns, as related to the Selected Solid Waste Management System, for the next five and ten year periods.

Population Growth Patterns within Hillsdale County are expected to be a continuation of patterns which have existed at the recent past. Generally, considerable growth is expected in Somerset Township located in the northeast corner of the county because of the number of lakes in the township and the growth and development of residential dwellings surrounding these lakes. Growth is anticipated in the City of Hillsdale and the Village of Jonesville and the remaining cities and villages in the county, but this growth will likely be below the average growth rate for the county. Growth in rural areas of the county are expected to grow at a rate higher than that of cities and villages, but below the rate of growth for Moscow Township.

The resulting pattern of development over the planning period will be a continuation of population dispersion into rural areas of the county. As a result of this growth pattern, costs associated with the collection and transportation of solid waste are expected to continue to increase.

Hillsdale County



Hillsdale, Michigan

DATA BASE

SOLID WASTE MANAGEMENT ALTERNATIVES

The following briefly describes all solid waste management systems considered by Hillsdale County and how each alternative will meet the needs of Hillsdale County. The manner of evaluation and ranking of each alternative is also described. Details regarding selected alternatives are located in the following section. Details regarding each non-selected alternative are located in Appendix B.

The Hillsdale County Solid Waste management Planning Committee considered the following alternatives for solid waste management: 1.) A continuation of the status quo, 2.) Intensified recycling and waste reduction with landfilling, 3.) Resource Recovery (Incineration) and landfilling, 4.) Landfilling. Alternative #2 - Recycling/Waste reduction with landfilling was selected as the preferred solid waste management alternative. Each alternative is summarized in more detail as follows:

Alternative # 1 **(Status Quo)**

Alternative 1 assumes that the existing solid waste management practices in Hillsdale County will be continued, including the recycling of paper, glass, plastic, and metals.

Alternative # 2 **Recycling/Waste Reduction with Landfilling** (SELECTED)

This alternative emphasizes reduction of the volume of wastes that are landfilled through recycling of a variety of materials, and waste volume reduction at the landfill site through baling, shredding and compaction. It is essentially an expansion of the operations that are presently taking place within the county.

This alternative is based on the assumption that 65% of all paper is recyclable and that 85% of that amount, under optimum conditions, could be collected and sold and that 50% of the glass, metals, and aluminum generated in the waste stream is recyclable and that 75% of that amount could be collected and sold.

Under this alternative, a volunteer or privately operated drop-off program and curbside collection would be instituted to incorporate a countywide public/private partnership effort to capture a larger volume of recyclable materials.

Composting of yard wastes is a component of this alternative. At the municipal level, the cities of Hillsdale, Litchfield, and Reading, and the Village of Jonesville would initiate composting of leaves.

A countywide household hazardous waste collection and disposal program would be continued with participation with another county to share expenses.

The program would utilize both drop off and curbside recycling for residential wastes and a drop off center for commercially and industrially derived materials.

This alternative still requires the use of a licensed landfill for materials that are not recyclable. The three most viable options at this time for a landfill are the continued use of an out-of-county facility, the construction of a new regional or multi-county licensed landfill, or the construction of a Type II landfill and Type III landfill in Hillsdale County over the long-range.

Alternative 3 - Resource Recovery with Landfill

Under this proposed alternative, a waste-to-energy incinerator would be constructed to burn a large portion of the county's combustible wastes. One option under this alternative calls for a multi-county waste-to-energy facility to be located in Hillsdale County or a surrounding county. With this alternative, it would be necessary to either construct a suitable landfill for ash within the county or to use a licensed landfill in an adjacent county.

Under this alternative, a public or privately operated landfill would be constructed in Hillsdale County or a surrounding county to accept waste that was not burned at the waste-to-energy facility as well as ash from that facility. As an option, a multi-county or regional landfill could be constructed in Hillsdale County or a surrounding county.

In Alternative 3, recycling would still take place, although the volumes and types of recyclable materials collected and processed would be reduced as a result of incineration in the waste-to-energy facility. Combustible materials, such as cardboard, could be the primary components of the recyclable waste stream that would be transferred to waste-to-energy production. Other noncombustibles, however, such as metals and glass, could continue to be recycled.

Alternative 4 - Landfill

This alternative calls for landfilling to be the primary means of waste disposal over the next 20 years. Under this alternative, three options are available. These consist of the siting of a landfill in Hillsdale County over the next 20 years, the siting of a regionwide landfill in one of the surrounding counties, or the construction of a multi-county landfill in Hillsdale County.

Under Alternative 4, recycling could be practiced on a volunteer basis, although it would be secondary to landfilling. Local residents could be encouraged to drop off newsprint, cardboard, glass, metal, and plastic at a central recycling facility or facilities.

Composting of organic materials would be monitored, but not mandated. A household hazardous waste collection program would be instituted. Transfer facilities could be located in strategic, cost-effective sites throughout the county.

Evaluation and Ranking of Hillsdale County Solid Waste Alternative System.

To evaluate and rank the alternative solid waste systems for Hillsdale County, a numerical rating system was developed. The rating system consists of two sets of numbers. The first set is called the Importance Value and represents the subjective importance that has been assigned to each of the evaluation criteria. These are ranked on a scale of one (1) to ten (10) with one (1) signifying minimal importance and ten (10) signifying substantial importance. The second set of numbers, the impact values, represents the expected impact of each of the alternative systems on each of

the evaluation criteria. These are also ranked subjectively, on a scale of one (1) to ten (10), with one (1) indicating a relatively negligible or poor impact upon the specific criteria and ten (10) representing a positive impact upon, or association with, the criterion. The relative positioning of each alternative, using these criteria, can be determined by multiplying the Importance Value assigned to each criteria (for example - 8) by the impact value assigned to the particular alternative (as it impacts that criteria - for example - 6) to arrive at an assigned score for the impact of the alternative on the criteria (i.e., 48). The assigned scores for each alternative are then added together to arrive at a composite or total score for each alternative. Evaluation matrices that provide the individual and total points assigned to each alternative in association with the evaluation criteria are shown in the Evaluation Matrix--Alternative Proposals table in this section of the Plan update. In the evaluation matrix, the higher the score, the more acceptable the alternative.

In reading the Evaluation Matrix, the number in the upper left side of the cell represents the value assigned to the impact of the alternative on the Evaluation Criteria and the number in the lower right side of the cell represents the product of the Impact Value times the Importance Value.

Rationale of Assigned Values

The following describes the rationale associated with point assignments for alternative solid waste systems for Hillsdale County.

A. Technical Feasibility - An Importance Value of 10 is assigned the technical feasibility criterion because of the critical importance of securing available technology for each of the alternatives to ensure the most efficient system possible. Technical capability impacts environmental, energy, and economic considerations. Alternatives 1, 2, and 4 have a positive association with this criterion because those technologies are already available. Resource recovery has a lesser impact because the technology for the alternative has not been perfected.

B. Economic Feasibility - This criterion is assigned a value of 10 because any system has to become as economically self-sufficient as possible in order to gain political and public acceptability and to continue to improve technologically. Capital and operation/maintenance costs are assigned a value of 10 while the distribution costs among all jurisdictions, while very important and related to political and public acceptance, is assumed to be negotiable and consequently is assigned a lower Importance Value. The Impact Value of each alternative is based on a scale of 3 to 10 inversely related to the system costs of each alternative for capital improvement and for maintenance and operation.

C. Access to Land and Transportation Routes - The maximum land area required for any of the alternatives is 520 acres. Since the majority of the county and region is rural, with relatively low density development, there is an abundance of raw land available for all of the systems in each alternative. Consequently, the land area required is assigned a lower Importance Value. It should be noted that political acceptability of a landfill or waste-to-energy facility will impact the importance of the location of a project site.

The road improvement required for each of the alternatives will reflect environmental as well as economic costs. These impacts, however, are not substantially significant and are, therefore, given an Importance Value of 6.

The location of all facilities in relation to distance and ease of access from population centers is relatively important because it determines the costs associated with transportation and is a long-term operational expense to be considered in each alternative. Alternative 1, Status Quo use of an out-of-county landfill, has the least impact on additional use of land and is, therefore, assigned the highest Impact Value. Likewise, this alternative has the least negative impact on required road improvements and central location.

Alternative 2, Option A, recycling with continued use of an out-of-county landfill, also has the least negative impact on additional use of land and required road improvements. In all alternatives, the siting of a multi-county landfill in a surrounding county will also have little negative impact on Hillsdale County.

D. Energy consumption over the planning period is an important element of cost associated with each alternative. Energy consumption will be a component of any solid waste management system, although the amount of energy usage will vary among systems. The Importance Value given to energy consumption for collection and transportation of solid wastes is, therefore, not of relatively high importance (it is assigned a value of 6). Energy consumption for disposal is even less critical, as the amount of energy for landfilling is relatively low compared to the energy consumed for collection and transportation. Energy production via a waste-to-energy facility will mitigate much of the concern associated with energy usage. Alternative 3, Option C and Alternative 4, Option A, will require the least amounts of energy for collection and transportation, while Alternative 2, Options A and B, will require the least amounts of energy for disposal.

E. Natural Resource Conservation is considered important as an element of efficient solid waste management. Materials recovery and composting are considered to be an increasingly desirable method of managing wastes. Energy recovery, likewise, will become increasingly important in the long run, but is not considered as a critical factor over the planning period. Alternative 2 and Alternative 3 are both highly commensurate with materials recovery and composting while Alternative 3 is most conducive to energy recovery.

F. Environmental Impacts are important in terms of air, noise and groundwater pollution. Consequently, negative impacts related to construction are perceived as having a value of 10. Operation and maintenance is also perceived as having a negative environmental impact relative to noise, dust, potential groundwater pollution and, in the case of waste-to-energy facility, air pollution, and is, therefore, also given an Importance Value of 10. Since Alternative 1, Alternative 2, Options A and B, Alternative 3, Option A and B and Alternative 4, Option B, require transfer of wastes to out-of-county landfills, they would have the least negative impacts associated with construction.

G. Public health is always a primary consideration in any alternative and, therefore, is given a value of 10. Alterative 2, Option A, is considered to have the least impact on public health to residents of Hillsdale County and is, therefore, given a relatively higher Impact Value.

H. Public Acceptability is important for the success of each of the alternatives, particularly those involving resource recovery, recycling and construction of a regional landfill. Support by the general public is necessary for recycling while slightly less important for implementation of a resource recovery or regional landfill option. Political acceptability is given a slightly higher ranking than public acceptance because it is required before a multi-county cooperative program, as well as for all other alternatives, can be implemented, even by the private sector. Obviously, compliance with laws is necessary before any of the alternatives can be enacted and is, therefore given an Importance Value of 10. Alternative 2, Options A and B and Alternative 4, Option B, should have a relatively high degree of public support as well as political acceptability. Alternative 2, Option B, Alternative 3, Options A, B, and C, and Alternative 4, Options A, B, and C will have a greater likelihood of complying with legal requirements.

EVALUATION CRITERIA AND IMPORTANCE FACTORS

Evaluation Criteria			Importance Factors
A.	Technical Feasibility		10
B.	Economic Feasibility		
	1.	Capital Costs	10
	2.	Operation and Maintenance Costs	10
	3.	Distribution of Costs	8
C.	Access to Land and Transportation Routes		
	1.	Land Area Required	4
	2.	Road Improvements Required	6
	3.	Central Location	8
D.	Energy Consumption		
	1.	For Collection and Transport	6
	2.	For Disposal	4
E.	Natural Resource Conservation		
	1.	Materials Recovery/Composting	8
	2.	Energy Recovery From Solid Waste	6
F.	Environmental Impacts		
	1.	Construction (Short-Term)	10
	2.	Operation and Maintenance (Long-Term)	10
G.	Public Health Effects		10
H.	Public Acceptability		
	1.	Public Support of Plan	8
	2.	Political Acceptability	8
	3.	Compliance with State Laws	10

EVALUATION MATRIX
ALTERNATIVE PROPOSALS

Evaluation Criteria	Rank (Importance) Value	Alternative 1 Status Quo	Alternative 2 Recycling/Waste Reduction/Landfilling Option A	Option B	Option C	Alternative 3 Resource Recovery with Landfilling Option A	Option B	Option C	Alternative 4 Landfilling Option A	Option B	Option C
Public Health	(10)	5/50	8/80	8/80	7/70	7/70	8/80	6/60	7/70	8/80	6/60
Environmental Impacts - Construction	(10)	-- 9/90	-- 8/80	-- 6/60	-- 4/40	-- 7/90	-- 7/70	-- 4/40	-- 4/40	-- 7/70	-- 3/30
- Operation and Maintenance	(10)	8/80	7/70	6/60	7/70	5/50	5/50	4/40	4/40	6/60	4/40
Access to land and Transportation - Land Area Required	(4)	-- 8/32	-- 8/32	-- 4/16	-- 4/16	-- 7/28	-- 5/20	-- 5/20	-- 5/20	-- 5/20	-- 4/20
- Road Improvements Required	(6)	5/30	8/48	4/24	4/24	7/42	6/36	5/30	5/30	6/36	5/30
- Central Location	(8)	4/32	5/40	6/48	8/64	7/56	7/56	9/72	9/72	4/32	9/72
Energy Consumption - Collection and Transportation	(6)	-- 3/18	-- 7/42	-- 7/42	-- 7/42	-- 7/42	-- 7/42	-- 8/48	-- 8/48	-- 6/36	-- 8/48
- Disposal	(4)	5/20	7/28	7/28	7/28	6/24	6/24	6/24	5/20	4/16	4/16
Natural Resources Conservation - Materials Recovery/Composting	(7)	-- 5/35	-- 9/63	-- 9/63	-- 9/63	-- 6/42	-- 7/49	-- 7/49	-- 5/35	-- 5/35	-- 5/35
- Energy Recovery	(4)	1/4	2/8	2/8	2/8	9/36	9/36	9/36	2/8	2/8	2/8
Public Acceptability - Public Support	(8)	-- 7/56	-- 8/64	-- 6/48	-- 7/56	-- 5/40	-- 4/32	-- 4/32	-- 5/40	-- 8/64	-- 4/32
- Political Acceptability	(9)	8/72	8/72	6/54	7/56	5/45	4/36	5/45	6/54	7/63	5/45
- Compliance with Act 641, other laws	(10)	6/60	10/100	10/100	10/100	10/100	10/100	10/100	7/70	8/80	8/80
Technical Feasibility	(10)	10/100	10/100	10/100	10/100	9/90	8/80	9/90	10/100	10/100	10/100
Economic Feasibility - Capital Costs	(10)	-- 10/100	-- 9/90	-- 5/50	-- 8/80	-- 6/60	-- 1/10	-- 4/40	-- 7/70	-- 2/20	-- 3/30
- Operation and Maintenance	(10)	10/100	9/90	6/60	8/80	3/30	1/10	2/20	7/70	4/40	5/50
- Cost Distribution	(8)	10/80	9/72	7/56	6/48	3/24	1/8	2/16	4/32	5/40	8/64

The following is the composite score for each of the alternative proposals for the five-year update.

	Total Points
Alternative 1 - Status Quo	959
Alternative 2 - Recycling/Landfilling	
Option A - Out-of-County Landfill	1,079
Option B - New Multi-County Landfill	897
Option C - Type III County Landfill/Type II County Landfill based on an emergency basis only	945
Alternative 3 - Resource Recovery/Landfilling	
Option A - Out-of-County Landfill	869
Option B - Multi-County Landfill (Adjacent County)	739
Option C - Multi-County Landfill (In Hillsdale County) on an emergency basis only	762
Alternative 4 - Landfill	
Option A - County Landfill on an emergency basis only	819
Option B - Multi-County Landfill	800
Option C - Multi-County Landfill in Hillsdale County on an emergency basis only	760

Alternative 1, Status Quo. The positive factors associated with this Alternative are the minimal negative environmental impacts resulting from construction, the small amount of additional land area required, the perceived public support for continuation of existing services, the degree of political support for the same reason, the existence of enough technical capability to implement this alternative and the relatively law capital costs associated with maintaining the status quo. Alternative 1 weaknesses are that the maintenance of the status quo requires hauling to facilities outside of Hillsdale County, necessitating consumption of a relatively large amount of energy for collection and disposal, and materials recovery and energy recover are minimal.

Alternative 2, Option A - Recycling/Waste Reduction/Landfilling, Using an Out-of-County Landfill. The strengths of this alternative are its minimal negative impacts on public health and the environment, recovery of recyclable materials, composting, legal compliance, available technical capability and relatively low capital and operating/maintenance costs, equitable distribution of those costs and public and political acceptability. This alternative is weakest in its capacity to provide a central location for final disposal. All local government units will be encouraged to provide convenient recycling in the form of curbside recyclables collection or drop-off stations located in an area accessible to the public and open at least two weeks (14 days) per month.

Alternative 2, Option B - Recycling/Waste Reduction/Landfilling using a Multi-County Landfill. This alternative is competitive in its relatively low negative impact on public health, its ability to recover recyclable materials, its compliance with law, the existence of technologies to make the project workable and its cost distribution among residents and businesses. This alternative is substantially less attractive in terms of the amount of additional land and additional road improvements needed, and public and political acceptability. By the end of the planning period, all local government units will be encouraged to provide convenient recycling in the form of curbside recyclables collection or drop-off stations located in an area accessible to the public and open at least two weeks (14 days) per month.

Alternative 2, Option C - Recycling/Waste Reduction/Type II and Type III Landfills in Hillsdale County. This alternative will reduce or eliminate the volume of unrecyclable wastes that have to be transported to an out-of-county landfill. As with Options A and B of this alternative, Option C's major strengths are that it provides for a high level of materials recovery, is in compliance with law, and is technically feasible. This option scores low in its capacity for energy recovery. It would also require additional land be set aside for road improvements and operations of both the Type 2 and Type 3 landfills.

Alternative 3, Option A - Resource Recovery with Landfilling using a Landfill in a Surrounding County. Resource recovery combined with the use of a landfill in a surrounding county will allow for energy recovery through incineration of solid wastes, is in compliance with the intent of law and will become increasingly more technically feasible. It will also require a relatively smaller amount of energy consumption for disposal. Negative factors included in Alternative 3, Option A, are its negative environmental impacts associated with operation and maintenance, public, and political acceptability (primarily because of unfamiliar technology and high cost), and the limited amount of recycling that can occur.

Alternative 3, Option B - Resource Recovery with Landfilling Using a Multi-County Landfill

Located Outside of Hillsdale County. This alternative has a fairly small negative impact on public health as all wastes are concentrated in one area, and these wastes are primarily ash residue from an incinerator. This option has a high positive correlation with the ability to recover energy from solid waste, reducing the energy consumed in disposal, and is in compliance with law as well as technically feasible. It is relatively weak in that it would have a high negative environmental impact, particularly in reference to air quality, would likely have little public or political support, and has the highest capital and operating costs, as well as cost distribution, of all the alternatives.

Alternative 3, Option C - Resource Recovery with Landfilling Using a Landfill in Hillsdale County as a Multi-County Landfill. This alternative is desirable in its central location, which decreases energy consumption related to collection and transportation. This option also emphasizes energy recovery, is in compliance with law and is technically feasible. It is undesirable from the standpoint of negative construction and operation and maintenance impacts on the environment. A substantial amount of land area and new road construction or improvements would be needed. This option also has relatively high economic costs and would likely have little public and political support.

Alternative 4, Option A - Landfilling with Use of a County Landfill. Landfilling with a county landfill would be centrally located and require less energy consumption for collection and transportation than other options. The proposed central location is a positive factor. Technical feasibility of this option is high, and operation and maintenance costs are relatively lower than other alternatives. Equitable cost distribution among county residents is inherent in this option. This system's weakest factor lies in its inability to recover energy, negative environmental impacts, low materials recovery and public support, as well as land area and transportation improvements that would be required.

Alternative 4, Option B - New Multi-County Landfill - This option's positive factors include its limited negative impact on the health of Hillsdale County residents, compliance with law, and its capacity to be technically feasible and implementable. The costs associated with operation and maintenance of a multi-county landfill are mid-range compared to other alternatives. This option requires additional land area and provides for no recovery of energy.

Alternative 4, Option C - Multi-County Landfill in Hillsdale County - The principal assets of this option are its central location, which reduces the consumption of energy related to collection and transportation, its technical feasibility and its relatively moderate costs associated with operation and maintenance of the multi-county landfill. Some negative aspects are its low capacity to recover energy, low public and political support, as well as the amount of land and road improvements required.

Recommended Solid Waste Management Plan

The selection of the recommended solid waste management plan for the ten-year planning period is based upon the objective evaluation of the suggested alternatives' ability to conform to the county's solid waste goals and objectives, their relative capacity to meet the criteria identified in the Evaluation matrices, and the overall costs of each alternative. Subjective factors (those that cannot necessarily be quantified or measured), such as the personal preferences of local decision-

makers also play a role in determining the selected alternative.

The following is a synopsis of the plan alternatives and options as they relate to those factors (technical evaluation, conformance to goals and objectives, and relative costs). Alternative solid waste systems are evaluated in terms of satisfying goals, objectives and policies of this plan.

Plan Goals and Objectives

The policies adopted as part of this Plan update are not classified according to importance. Consequently, all policies are assumed to be of equal importance. Therefore, the criterion for selection of a preferred alternative relative to policies is the number of policies to which the alternative conforms. Alternative 2, Options A and B, and Alternative 3, Options A, B, and C meet ten of the Plan update's short-range policies, while Alternative 4, Options A, B, and C meets nine of the Plan update's identified short-range policies. Alternative 1 only meets five of those policies.

Technical Evaluation

This factor is defined by the Plan Evaluation Criteria and Importance Factors that include technical, energy, natural resources, environmental, public health, political and access considerations. The matrix value method used in this Plan update, minus the score for economic feasibility, is the criterion used to determine the most viable alternative according to technical capability. Based upon that criterion, the following cumulative score is given to each alternative:

	Total Points
Alternative 1 - Status Quo	679
Alternative 2 - Recycling/Landfilling	
Option A - Out-of-County Landfill	827
Option B - New Multi-County Landfill	731
Option C - Type III County Landfill/Type II County Landfill on an emergency basis only	737
Alternative 3 - Resource Recovery/Landfilling	
Option A - Out-of-County Landfill	755
Option B - Multi-County Landfill (Adjacent County)	711
Option C - Multi-County Landfill on an emergency basis only	686
Alternative 4 - Landfill	
Option A - County Landfill	647
Option B - Multi-County Landfill	700
Option C - Multi-County Landfill in Hillsdale County on an emergency basis only	616

Alternative 2, Option A, Recycling/Resource Recovery/Landfill using an out-of-county landfill is the most practical alternative in terms of technical, environmental, political, energy conservation and accessibility factors. Alternative 3, Option A, Resource Recovery/Landfilling, using an out-of-county landfill and Alternative 2, Option C, Recycling and Landfilling using Type II and Type III Landfills in the county are the second and third most "technically" viable options. The least desirable, according to these factors, is Alternative 4, Option C, Landfilling using a multi-county landfill in Hillsdale County.

Cost Evaluation - Costs associated with implementing each alternative are categorized according to the costs of construction and equipment (capital costs), operation and maintenance, and the distribution of costs on a per-ton basis. Each of the alternatives is designed to spread the costs of waste management equally within the county to all jurisdictions, residences, and businesses. The criterion for cost distribution used in this Plan update is, therefore, the computed cost per ton, using the same volumes of waste in all alternatives. Alternative 1, is the least costly relative to capital costs of construction and equipment. Alternative 2, Option A and Option C are the second and third least costly in terms of capital costs. Alternative 3, Option B, Resource Recovery with Landfilling, using a new multi-county landfill requires the most costly capital improvements. Among operation and maintenance costs, Alternative 1, Status Quo, is the least expensive to county residents. Alternative 2, Option A, Recycling/Landfilling using an out-of-county landfill, is the second least expensive in terms of operation. Alternative 2, Option C, Recycling using a Type II and Type III County Landfill, has the third least expensive operation and maintenance costs. The highest operation and maintenance costs are associated with Alternative 3, Option B, Resource Recovery with Landfilling, using a multi-county landfill outside of Hillsdale County. When comparing the alternatives' combined capital and operation and maintenance costs per total annual tonnage of solid waste, Alternative 1, Status Quo, is the most cost-effective at $24.20 per ton. Alternative 2, Option A, Recycling using an out-of-county landfill, is the second most cost-effective at $25.33 per ton and Alternative 4, Option C, Landfilling using a multi-county landfill in Hillsdale County, is the third most cost-effective at $28.55 per ton. The least effective alternative on a cost-per-ton basis distribution is Alternative 3, Option B, a resource recovery facility using multi-county landfill at $60.57 per ton.

When considering all the cost factors together -- capital costs, operation and maintenance, and cost per ton, Alternative 2, Option A, Recycling using an out-of-county landfill, receives the most total points (252), with Alternative 4, Option C, a multi-county landfill in Hillsdale County, compiling a cost related score of 214 and Alternative 2, Option B, Recycling/Waste Reduction/Landfilling, using a multi-county landfill, has a combined capital, O & M per ton score of 206. The most costly alternative is Alternative 3, Option B, Resource Recovery with a multi-county landfill. Consideration of the capacity to meet the greatest number of goals and objectives, the short-range technical evaluation, and cost evaluation, yields Alternative 2, Option A - Recycling/Waste Reduction/Landfilling Using an Out-of-County Landfill is the most viable Alternative Management Plan, with Alternative 2, Option B, Recycling, using a new multi-county landfill and Alternative 2, Option C, Recycling using Type II and Type III Landfills in Hillsdale County as reasonable alternate programs.

THE SELECTED SOLID WASTE MANAGEMENT SYSTEM

The Selected Solid Waste Management System (Selected System) is a comprehensive approach to managing Hillsdale County's solid waste and recoverable materials. The Selected System addresses the generation, transfer and disposal of Hillsdale County's solid waste. It aims to reduce the amount of solid waste sent for final disposal by volume reduction techniques and by various resource conservation and resource recovery programs. It also addresses collection processes and transportation needs that provide the most cost effective, efficient service. Proposed disposal area locations and capacity to accept solid waste are identified as well as program management, funding, and enforcement roles for local agencies. Detailed information on recycling programs, evaluation, and coordination of the Selected System is included in Appendix B. Following is an overall description of the Selected System:

SELECTED SYSTEM

IMPORT AUTHORIZATION

If a licensed solid waste disposal area is currently operating within the county, disposal of solid waste generated by the following EXPORTING COUNTIES are authorized by Hillsdale County up to the authorized quantity according to the conditions authorized in Table 1-A.

Table 1-A
CURRENT IMPORT VOLUME AUTHORIZATION OF SOLID WASTE

IMPORTING COUNTY	EXPORTING COUNTY	FACILITY NAME	AUTHORIZED QUANTITY/DAILY	AUTHORIZED QUANTITY/ANNUAL	AUTHORIZED CONDITIONS
Hillsdale	Branch	Hillsdale Transfer Station			P
Hillsdale	Calhoun	Hillsdale Transfer Station			P
Hillsdale	Jackson	Hillsdale Transfer Station			P
Hillsdale	Lenawee	Hillsdale Transfer Station			P

n/a - not applicable

a. **Facilities are only listed if the exporting county is restricted to using specific facilities within the importing county.**
b. **Authorization indicated by P = Primary Disposal; C = Contingency Disposal; * = Other conditions exist and detailed explanation is included in the Attachment Section.**

It a new solid waste disposal area is constructed and operating in the future in the county, then disposal of solid waste generated by the exporting county is authorized by the importing county up to the authorized quantity according to the authorized conditions in Table 1-B.

Table 1-B

FUTURE IMPORT VOLUME AUTHORIZATION OF SOLID WASTE CONTINGENT ON NEW FACILITIES BEING SITED

EXPORTING COUNTY	IMPORTING COUNTY	FACILITY NAME	AUTHORIZED QUANTITY/DAILY	AUTHORIZED QUANTITY/ANNUAL	AUTHORIZED CONDITIONS

No new disposal facility (Type II or III landfill or, solid waste incinerator) is planned in Hillsdale County during the planning period.

n/a - not applicable

a. Facilities are only listed if the exporting county is restricted to using specific facilities within the importing county.

b. Authorization indicated by P = Primary Disposal; C = Contingency Disposal; * = Other conditions exist and detailed explanation is included in the Attachment Section.

SELECTED SYSTEM

EXPORT AUTHORIZATION

If a licensed solid waste disposal area is currently operating with another county, disposal of solid waste generated by the exporting county is authorized up to the authorized quantity according to the conditions authorized in Table 2-A if authorized for import in the approved solid waste management plan of the receiving county.

Table 2-A

CURRENT EXPORT VOLUME AUTHORIZATION OF SOLID WASTE

EXPORTING COUNTY	IMPORTING COUNTY	FACILITY NAME	AUTHORIZED QUANTITY/DAILY	AUTHORIZED QUANTITY/ANNUAL	AUTHORIZED CONDITIONS
Hillsdale	Williams, Ohio	Williams Co. Landfill			P
Hillsdale	Calhoun	C & C Landfill			P
Hillsdale	Lenawee	Adrian Landfill			P
Hillsdale	Jackson	Philip McGill Landfill Liberty Env. (Type III)			P
Hillsdale	Washtenaw	Arbor Hills Landfill			P
Hillsdale	Barry	City Env. Services Landfill			P
Hillsdale	Branch	Coldwater Transfer Station			P
Hillsdale	St. Joseph	Westside Landfill			P
Hillsdale	Wayne, Indiana	National Serv-All Landfill			P

n/a - not applicable

a. **Facilities are only listed if the exporting county is restricted to using specific facilities within the importing county.**
b. **Authorization indicated by P = Primary Disposal; C = Contingency Disposal; * = Other conditions exist and detailed explanation is include in the Attachment Section.**

If a new solid waste disposal area is constructed and operates in the future in another county, then disposal of solid waste generated by the exporting county is authorized up to the authorized quantity according to the authorized conditions in Table 2-B if authorized for import in the approved solid waste management plan of the receiving county.

Table 2-B

FUTURE EXPORT VOLUME AUTHORIZATION OF SOLID WASTE CONTINGENT ON NEW FACILITIES BEING SITED

EXPORTING COUNTY	IMPORTING COUNTY	FACILITY NAME	AUTHORIZED QUANTITY/DAILY	AUTHORIZED QUANTITY/ANNUAL	AUTHORIZED CONDITIONS

n/a - not applicable

a. Facilities are only listed if the exporting county is restricted to using specific facilities within the importing county.

b. Authorization indicated by P = Primary Disposal; C = Contingency Disposal; * = Other conditions exist and detailed explanation is included in the Attachment Section.

SELECTED SYSTEM

SOLID WASTE DISPOSAL AREAS

The following identifies the names of existing disposal areas which will be used to provide the required capacity and management needs for the solid waste generated within the county for the next five and ten years and, if possible, the next ten years. Pages III-7 through III-21 contain descriptions of the solid waste disposal facilities which area located within the county and the disposal facilities located outside of the county which will be used by the county for the planning period. Additional facilities within the county with applicable permits and licenses may be used as they are sited by this plan, or amended into this plan, and become available for disposal. If this plan update is amended to identify additional facilities in other counties outside the county, those facilities may only be used if such import is authorized in the receiving county's plan. Facilities outside of Michigan may also be used if legally available for such use.

Type II Landfill:

Williams County Landfill
Adrian Landfill
C & C Landfill
Philip McGill Landfill
Arbor Hills Landfill
City Environmental Services Landfill, Inc. of Hastings
National Serv-All Landfill of Ft. Wayne, IN

Type III Landfill:

Liberty Environmentalist Landfill
C & C Landfill

Incinerator:

None

Waste-to-Energy Incinerator:

None

Type A Transfer Facility:

City of Hillsdale Transfer Station
Coldwater Transfer Station

Type B Transfer Facility:

Camden Township Transfer Station
Jefferson Township Transfer Station
Reading Township Transfer Station
Ransom Township Transfer Station
Scipio Township Transfer Station
Irish Hills Transfer Station

Processing Plant:

None

Waste Piles:

None

Other:

SELECTED SYSTEM

FACILITY DESCRIPTIONS

Facility Type: Class A Transfer Station

Facility Name: City of Hillsdale Transfer Station

County: Hillsdale Location: Town: 6S Range: 3W Section(s): 22

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Tri-State Waste, Inc., Williams County Landfill

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	_____contaminated soils
_____pending	_____special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	__10__ acres
Total area site for use:	__10__ acres
Total area permitted:	__10__ acres
Operating:	_____ acres
Not excavated:	_____ acres

Current capacity:	__52__ cubic yards
Estimated lifetime:	_____ years
Estimated days open per year:	__312__ days
Estimated yearly disposal volume:	16,239 cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type B Transfer Station

Facility Name: Camden Township Transfer Station

County: Hillsdale Location: Town: 8S Range: 4W Section(s): 9

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Tri-State Waste, Inc., Williams Co. Landfill

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	_____commercial
_____licensed	_____industrial
_____construction permit	_____construction and demolition
_____open, but closure	_____contaminated soils
_____pending	_____special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	__1__ acres
Total area site for use:	__1__ acres
Total area permitted:	__1__ acres
Operating:	__1__ acres
Not excavated:	_____ acres

Current capacity:	400.7 tons
Estimated lifetime:	_____ years
Estimated days open per year:	__52__ days
Estimated yearly disposal volume:	__600__ tons

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type B Transfer Station

Facility Name: Jefferson Township Transfer Facility

County: Hillsdale Location: Town: 7S Range: 2W Section(s): 8

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Tri-State Waste, Inc., Williams Co. Landfill

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	_____commercial
_____licensed	_____industrial
_____construction permit	__X__construction and demolition
_____open, but closure	_____contaminated soils
_____pending	_____special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	__10__ acres
Total area site for use:	__10__ acres
Total area permitted:	_____ acres
Operating:	_____ acres
Not excavated:	_____ acres

Current capacity:	_____cubic yards
Estimated lifetime:	__30__ years
Estimated days open per year:	__78__days
Estimated yearly disposal volume:	2,670 cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type B Transfer Station

Facility Name: Ransom Township Transfer Station

County: Hillsdale Location: Town: 8S Range: 2W Section(s): 18

Map identifying location included in Attachment Section: __X__ Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Tri-State Waste, Inc., Williams Co. Landfill

Operating Status	Waste Types Received
__X__ open	__X__ residential
_____ closed	_____ commercial
_____ licensed	_____ industrial
_____ construction permit	_____ construction and demolition
_____ open, but closure	_____ contaminated soils
_____ pending	_____ special wastes*
	_____ other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	__3__ acres
Total area site for use:	__3__ acres
Total area permitted:	__3__ acres
Operating:	__3__ acres
Not excavated:	_____ acres

Current capacity:	__160__ cubic yards
Estimated lifetime:	_____ years
Estimated days open per year:	__45__ days
Estimated yearly disposal volume:	__1,600__ tons

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type B Transfer Station

Facility Name: Reading Township Transfer Station

County: Hillsdale Location: Town: 7S Range: 4W Section(s): 30

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Tri-State Waste, Inc., Williams Co. Landfill

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	_____commercial
_____licensed	_____industrial
_____construction permit	_____construction and demolition
_____open, but closure	_____contaminated soils
_____pending	_____special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	__1__ acres
Total area site for use:	__1__ acres
Total area permitted:	__1__ acres
Operating:	__1__ acres
Not excavated:	_____ acres

Current capacity:	__40__ cubic yards
Estimated lifetime:	_____ years
Estimated days open per year:	__52__days
Estimated yearly disposal volume:	__720__tons

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type B Transfer Station

Facility Name: Scipio Township Transfer Station

County: Hillsdale Location: Town: 5S Range: 3W Section(s): 22

Map identifying location included in Attachment Section: 22 Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public X Private Owner: BFI, C & C Landfill

Operating Status	Waste Types Received
X open	X residential
_____ closed	_____ commercial
X licensed	_____ industrial
_____ construction permit	_____ construction and demolition
_____ open, but closure	_____ contaminated soils
_____ pending	_____ special wastes*
	_____ other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	2.24 acres
Total area site for use:	2.24 acres
Total area permitted:	2.24 acres
Operating:	2.24 acres
Not excavated:	_____ acres

Current capacity:	80 cubic yards
Estimated lifetime:	_____ years
Estimated days open per year:	52 days
Estimated yearly disposal volume:	2,600 cu. yds.

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type II Landfill

Facility Name: Williams County Landfill

County: Williams (Ohio) Location: Town: 1N Range: 2E Section(s): 35,36

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Tri-State Waste, Inc.

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	__X__contaminated soils
_____pending	__X__special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	614 acres
Total area site for use:	374 acres
Total area permitted:	160 acres
Operating:	58 acres
Not excavated:	101 acres

Current capacity:	22,505,000 cubic yards
Estimated lifetime:	86 years
Estimated days open per year:	307 days
Estimated yearly disposal volume:	168,850 tons or cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type II Landfill

Facility Name: Adrian Landfill

County: Lenawee Location: Town: 7,8S Range: 4E Section(s): 6,7

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public _____ Private Owner: _____

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	__X__contaminated soils
_____pending	__X__special wastes*
	__X__other:

- Explanation of special wastes, including a specific list and/or conditions:

  Shredder fluff, foundry sand

Site Size:

Total area of facility property:	421 acres
Total area site for use:	287 acres
Total area permitted:	40 acres
Operating:	19 acres
Not excavated:	20 acres

Current capacity:	2,002,000 cubic yards
Estimated lifetime:	6.8 years
Estimated days open per year:	307 days
Estimated yearly disposal volume:	97,731 cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Sanitary Landfill Type II and III

Facility Name: C & C Landfill

County: Calhoun Location: Town: 1S Range: 6W Section(s): 28

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Allied Waste Systems

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	__X__contaminated soils
_____pending	__X__special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:
  Non-hazardous solid and semi-solid wastes, no hazardous or liquid wastes

Site Size:

Total area of facility property:	224 acres	
Total area site for use:	_____ acres	
Total area permitted:	154 acres	
Operating:	33 acres	
Not excavated:	21 acres	Does not include Type III area as of 11-1-9

Current capacity:	3,360,000 cubic yards
Estimated lifetime:	7 years
Estimated days open per year:	286 days
Estimated yearly disposal volume:	1,100,000 tons

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type III Landfill

Facility Name: Liberty Environmentalist Landfill

County: Jackson Location: Town: 4S Range: 1W Section(s): 13

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Liberty Environmentalist

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	_____contaminated soils
_____pending	__X__special wastes*
	__X__other: Compost

- Explanation of special wastes, including a specific list and/or conditions:

  Shredder fluff, foundry sand

Site Size:

Total area of facility property:	285 acres
Total area site for use:	65 acres
Total area permitted:	15 acres
Operating:	7.5 acres
Not excavated:	40 acres

Current capacity:	400,000 cubic yards
Estimated lifetime:	20 years
Estimated days open per year:	300 days
Estimated yearly disposal volume:	165,000 cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type II Landfill

Facility Name: McGill Road Landfill

County: Jackson Location: Town: 2S Range: 1W Section(s): 24

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: Waste Management, Inc.

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	_____contaminated soils
_____pending	__X__special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

  Incinerator ash

Site Size:

Total area of facility property:	50.5 acres
Total area site for use:	50.5 acres
Total area permitted:	18.7 acres
Operating:	7.8 acres
Not excavated:	_____ acres

Current capacity:	740,000 cubic yards
Estimated lifetime:	5 years
Estimated days open per year:	310 days
Estimated yearly disposal volume:	148,000cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Class B transfer station and compost facility

Facility Name: Irish Hills Transfer Station

County: Lenawee Location: Town: 5S Range: 2E Section(s): 7

Map identifying location included in Attachment Section: __X__Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:

_____ Public __X__ Private Owner: Great Lakes Waste Services, Adrian Landfill

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
_____licensed	_____industrial
_____construction permit	__X__construction and demolition
_____open, but closure	_____contaminated soils
_____pending	_____special wastes*
	__X__other: Compost

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	__3__ acres
Total area site for use:	__1.5__ acres
Total area permitted:	__3__ acres
Operating:	__3__ acres
Not excavated:	_____ acres

Current capacity:	_____ cubic yards
Estimated lifetime:	_____ years
Estimated days open per year:	__120__ days
Estimated yearly disposal volume:	__2,000__ cubic yards

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Sanitary Landfill, Type II

Facility Name: Arbor Hills Landfill

County: Washtenaw Location: Town: 1S Range: 7E Section(s): 13, Salem Twp.

Map identifying location included in Attachment Section: ____Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:

_____ Public __X__ Private Owner: BFI Waste Systems of North America, Inc.

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
_____licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	__X__contaminated soils
_____pending	__X__special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

  Non-hazardous solid and semi-solid wastes, no hazardous or liquid wastes.

Site Size:

Total area of facility property:	936 acres
Total area site for use:	356 acres
Total area permitted:	217 acres
Operating:	113 acres
Not excavated:	104 acres

Current capacity:	30,500,000 airspace or 61.5 million cubic yds.
Estimated lifetime:	176 years
Estimated days open per year:	265 days
Estimated yearly disposal volume:	3,500,000

(if applicable)
Annual energy production:

Landfill gas recovery projects:	18 megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type II Landfill

Facility Name: City Environmental Services Landfill, Inc. of Hastings

County: Barry Location: Town: 3W Range: 8N Section(s): 6

Map identifying location included in Attachment Section: ____Yes __X__ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public __X__ Private Owner: U.S. Waste

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
__X__construction permit	__X__construction and demolition
_____open, but closure	__X__contaminated soils
_____pending	__X__special wastes*
	__X__other: Asbestos

- Explanation of special wastes, including a specific list and/or conditions:

  Foundry Sand, Fly Ash, Municipal wastewater sludges, trees and stumps.

Site Size:

Total area of facility property:	330 acres
Total area site for use:	330 acres
Total area permitted:	48 acres
Operating:	19.5 acres
Not excavated:	28.5 acres

Current capacity:	5,000,000 cubic yards
Estimated lifetime:	10+ years
Estimated days open per year:	308 days
Estimated yearly disposal volume:	175,000 tons

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Transfer Station

Facility Name: Coldwater Transfer Station

County: Branch Location: Town: 6S Range: 6W Section(s): 28

Map identifying location included in Attachment Section: ____Yes __X__ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:

__X__ Public _____ Private Owner: National Serv-All, Inc., Ft. Wayne, IN
National Serv-All Landfill, Ft. Wayne, IN

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	_____contaminated soils
_____pending	_____special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	__2__ acres
Total area site for use:	__2__ acres
Total area permitted:	_____ acres
Operating:	_____ acres
Not excavated:	_____ acres
Current capacity:	_____ cubic yards
Estimated lifetime:	_____ years
Estimated days open per year:	__300__days
Estimated yearly disposal volume:	_____ tons

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Landfill

Facility Name: National Serv-All, Inc.

County: Allen, Indiana Location: Town: 30N Range: 12E Section(s): 30

Map identifying location included in Attachment Section: ____Yes __X__ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:

_____ Public __X__ Private Owner: Republic, Inc.

Operating Status	Waste Types Received
__X__open	__X__residential
_____closed	__X__commercial
__X__licensed	__X__industrial
_____construction permit	__X__construction and demolition
_____open, but closure	__X__contaminated soils
_____pending	__X__special wastes*
	_____other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	440 acres
Total area site for use:	80 acres
Total area permitted:	80 acres
Operating:	30 acres
Not excavated:	50 acres

Current capacity:	4,875,000 cubic yards
Estimated lifetime:	13 years
Estimated days open per year:	300 days
Estimated yearly disposal volume:	375,000 tons

(if applicable)
Annual energy production:

Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type II Landfill

Facility Name: Westside Landfill R.D.F.

County: St. Joseph Location: Town: 6S Range: 12W Section(s): 22, 23, 26, 27

Map identifying location included in Attachment Section: X Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:
_____ Public X Private Owner: Waste Management of Michigan

Operating Status	Waste Types Received
X open	X residential
_____ closed	X commercial
X licensed	X industrial
_____ construction permit	X construction and demolition
_____ open, but closure	X contaminated soils
_____ pending	X special wastes*
	_____ other:

- Explanation of special wastes, including a specific list and/or conditions:

  Non-hazardous, non-liquid industrial waste, such as contaminated soils, foundry sand, asbestos and ash.

Site Size:

Total area of facility property:	640 acres
Total area site for use:	490 acres
Total area permitted:	85 acres
Operating:	51 acres
Not excavated:	34 acres

Current capacity:	6,430,000 tons
Estimated lifetime:	12 years
Estimated days open per year:	300+ days
Estimated yearly disposal volume: (if applicable)	1,200,000 yds.^{3}
Annual energy production:	
Landfill gas recovery projects:	2 megawatts
Waste-to-energy incinerators:	_____ megawatts

FACILITY DESCRIPTIONS

Facility Type: Type III Landfill

Facility Name: Westside Landfill R.D.F.

County: St. Joseph Location: Town: 6S Range: 12W Section(s): 23

Map identifying location included in Attachment Section: X Yes _____ No

If facility is an incinerator or a transfer station, list the final disposal site and location for incinerator ash or transfer station wastes:

_____ Public X Private Owner: Waste Management of Michigan

Operating Status	Waste Types Received
X open	_____ residential
_____ closed	X commercial
X licensed	X industrial
_____ construction permit	X construction and demolition
_____ open, but closure	_____ contaminated soils
_____ pending	_____ special wastes*
	_____ other:

- Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property:	35 acres
Total area site for use:	35 acres
Total area permitted:	18 acres
Operating:	6 acres
Not excavated:	12 acres

Current capacity:	Included in type II numbers
Estimated lifetime:	12 years
Estimated days open per year:	300+ days
Estimated yearly disposal volume: (if applicable)	_____ yds.^{3}
Annual energy production:	
Landfill gas recovery projects:	_____ megawatts
Waste-to-energy incinerators:	_____ megawatts

SOLID WASTE COLLECTION SERVICES AND TRANSPORTATION

The following describes the solid waste collection services and transportation infrastructure which will be utilized within the county to collect and transport solid waste.

All solid waste is currently collected by private haulers. It is expected that private waste haulers will continue to play a large part in the collection and transport of waste. In the event that municipal waste collection systems are begun, they are encouraged to include curbside recycling and composting programs as part of their contracts.

There are currently four licensed haulers providing services to Hillsdale County:

Provider	Type of Service	Area Served in Hillsdale County
Tri-State Waste Services (Laidlaw)	Residential, Commercial Contractual Collection	Entire county City of Hillsdale
Town and County Rubbish Removal	Residential, Commercial	SW corner of Hillsdale County--Areas of Camden, Reading and Montgomery
BFI	Residential, Commercial	Litchfield, northwest area of County
National Serv-All, Inc.	Residential	Southwest Hillsdale County

Waste collection in Hillsdale County is offered by two private carriers, Tri-State Waste Services (Laidlaw), BFI, and Town and Country Rubbish Removal. Collection services are offered throughout the County. Curbside recycling services are offered in the City of Hillsdale , however, recycling is also available at the City of Hillsdale Transfer Station. Residential collection services within the City of Hillsdale are offered solely by Tri-State Waste Services on the basis of a contractual agreement with the City. Wastes are collected once per week.

SELECTED SYSTEM

RESOURCE CONSERVATION EFFORTS:

The following describes the selected system's proposed conservation efforts to reduce the amount of solid waste generated throughout the county. The annual amount of solid waste currently or proposed to be diverted from landfills and incinerators is estimated for each effort to be used, if possible. Since conservation efforts are provided voluntarily and change with technologies and public awareness, it is not this plan update's intention to limit the efforts to only what is listed. Instead citizens, businesses, and industries are encouraged to explore the options available to their lifestyles, practices, and processes which will reduce the amount of materials requiring disposal.

Effort Description	Estimated Diversion (tons/year)		
	Current	5th year	10th year
Education regarding reduction of waste	0	1,500	4,100
Education regarding reuse	0	750	1,500

SELECTED SYSTEM

WASTE REDUCTION, RECYCLING, & COMPOSTING PROGRAMS:

Volume Reduction Techniques

The following describes the techniques used and proposed to be used throughout the county which reduces the volume of solid waste requiring disposal. The annual amount of landfill air space not used as a result of each of these techniques is estimated. Since volume reduction is practiced voluntarily and because technologies change and equipment may need replacing, it is not this plan update's intention to limit the techniques to only what is listed. Persons within the county are encouraged to utilize the technique that provides the most efficient and practical volume reduction for their needs. Documentation explaining achievements of implemented programs or expected results of proposed programs is attached.

Technique Description	Estimated Air Space Conserved (cubic yards/year)		
	Current	5th year	10th year
Compaction - Jefferson Township Transfer Station compactor to be installed 12/99	0	1,335	1,500

- Not considered part of the waste stream.

SELECTED SYSTEM

Overview of Resource Recovery Programs:

The following describes the type and volume of material in the county's waste stream that may be available for recycling or composting programs. How conditions in the county affect or may affect a recycling or composting program and potential benefits derived from these programs is also discussed. Impediments to recycling or composting programs which exist or which may exist in the future are listed, followed by a discussion regarding reducing or eliminating such impediments.

[X] Recycling programs within the county are feasible. Details of existing and planned programs are included in the following pages.

[ ] Recycling programs for the county have been evaluated and it has been determined that it is not feasible to conduct any programs because of the following:

- [x] Composting programs within the county are feasible. Details of existing and planned programs are included in the following pages.

- [ ] Composting programs for the county have been evaluated and it has been determined that it is not feasible to conduct any programs because of the following:

- [ ] Programs for source separation of potentially hazardous materials are feasible and details are included on the following pages.

- [x] Separation of potentially hazardous materials from the county's waste stream has been evaluated and it has been determined that it is not feasible to conduct any separation programs because of the following:

  Hillsdale County, recognizing the importance of offering hazardous waste disposal opportunities, has offered household hazardous waste collection days in the past. The cost of disposal of these wastes have resulted in the conclusion that future household hazardous waste days are financially unfeasible. The County may look at participation with another county as a way to manage disposal and operating costs.

SELECTED SYSTEM

RECYCLING AND COMPOSTING

The following is a brief analysis of the recycling and composting programs selected for the county in this plan. Additional information on operation of recycling and composting programs is included in Appendix A. The analysis covers various factors within the county and the impacts of these factors on recycling and composting. Following the written analysis, the tables on pages III-31, 32, & 33 list the existing recycling, composting, and source separation of hazardous material programs that are currently active in the county and which will be continued as part of this plan. The second group of three tables on pages III-34, 35, & 36 list the recycling, composting, and source separation of hazardous materials programs that are proposed in the future for the county. It is not this plan update's intent to prohibit additional programs or expansions of current programs to be implemented beyond those listed.

Recycling:

Recycling is offered in several communities in Hillsdale County. The City of Hillsdale has a transfer station that is operated by the Williams County Landfill. The station is open to county residents.

The City also operates a curbside program. This program is available only to City residents.

Transfer stations at Scipio, Ransom, and Fayette Township offer recycling of selected materials.

Recycling shall be encouraged, both at curbside, and associated with transfer stations to the extent that public health and safety will not be compromised.

Data on volumes of recycled materials has been requested from the Williams County Landfill. The facility has elected not to provide this data.

The provision of additional recycling opportunities is depended upon implementation by the private sector, an impediment to program development and expansion. In publicly operated transfer stations, in some locations recycling is not feasible due to the cost of hauling small volumes of materials.

Benefits of recycling could be reduced costs of disposal for county residents in some cases.

Composting:

In compliance with state requirements, yard waste is diverted from the waste stream destined for landfilling. The US EPA estimates that 14.3% of the waste stream is made up of yard waste.[1] Therefore, approximately 7,454 tons of yard waste is currently available for composting programs. As more of the County becomes urbanized, it is anticipated that yard waste will make up a higher percentage of the waste stream.

Composting programs are offered by the cities of Hillsdale and Litchfield and the Village of Jonesville and Waldron. In each case, both curbside pick-up and drop-off services are offered in spring and fall seasons. The programs are simple. Temperature and ph are not monitored. Each community uses composted materials and makes them available to residents. None of these communities have specialized equipment for handling materials. Approximately 6,400 cu yards are composted through these programs. Unknown quantities are processed through home composting.

Impediments to composting programs include cost of specialized equipment, the cost to administer temperature and ph testing, and markets for composted materials. Composting will be encouraged through education efforts conducted by local city and village departments of public works.

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[1]Characterization of MSW in the US: 1996 Update, US EPA. Washington, D.C.

SELECTED SYSTEM

TABLE III-1

RECYCLING:

Program Name	Service Area (a)	Public or Private	Collection Point (c)	Collection Frequency (d)	Materials Collected (e)	Program Management Responsibilities (b)		
						Development	Operation	Evaluation
Scipio Twp. Transfer Station	Scipio Twp.	Public	d	w	a,b,e,f	6	6	6
Ransom Twp. Transfer Station	Amboy, Ransom, and Woodbridge Twps.	Public	d	w	a,b,e,f	6	6	6
City of Hillsdale Transfer Station	City of Hillsdale	Public	d	d	a,b,c,d,e,f	6	6	6
City of Hillsdale Curbside Program	City of Hillsdale	Public	c	w	a,b,c,d,e,f	6	6	6
Fayette Twp. Transfer Station	Fayette Township	Public	d	d	a,b,c,d,e,f	6	6	6

(a) Identified by where the program will be offered. If throughout the planning area, then listed by planning area; if only in specific counties, then listed by county; if only in specific municipalities, then listed by its name and respective county.

(b) Identified by 1= Designated Planning Agency; 2 = County Board of Commissioners; 3 = Department of Public Works; 4 = Environmental Group (Identified on page 27); 5 = Private Owner/Operator; 6 = Other (identified on page 27)

(c) Identified by c = curbside; d = drop-off; o = onsite' and if other, explained.

(d) Identified by d = daily; w = weekly; b = biweekly; m = monthly; and if seasonal service also indicated by Sp = Spring; Su = Summer; Fa = Fall; Wi = Winter.

(e) Identified by the materials collected by listing of the letter located by that material type. A = Plastics; B = Newspaper; C = Corrugated Containers; D = Other Paper; E = Glass; F = Metals; P = Pallets; J = Construction/Demolition; K = Tires; L1, L2 etc. = as identified on page 29.

TABLE III-2

COMPOSTING:

Program Name	Service Area (a)	Public or Private	Collection Point (c)	Collection Frequency (d)	Materials Collected (e)	Program Management Responsibilities (b)		
						Development	Operation	Evaluation
City of Hillsdale	City of Hillsdale	Public	Drop-off, Curbside	m/Sp,Su,Fa	G,L,W	3	3	3
City of Litchfield	City of Litchfield	Public	Drop-off, Curbside	m/Sp,Fa	G,L,W	3	3	3
Village of Jonesville	Village of Jonesville	Public	Drop-off, Curbside	m,Fa	G,L,W	3	3	3
Village of Waldron	Village of Waldron	Public	Curbside		G,L,W	3	3	3

(a) Identified by where the program will be offered. If throughout the planning area, then listed by planning area; if only in specific counties, then listed by county; if only in specific municipalities, then listed by its name and respective county.

(b) Identified by 1= Designated Planning Agency; 2 = County Board of Commissioners; 3 = Department of Public Works; 4 = Environmental Group (Identified on page 27); 5 = Private Owner/Operator; 6 = Other (identified on page 27)

(c) Identified by c = curbside; d = drop-off; o = onsite; and if other, explained.

(d) Identified by d = daily; w = weekly; b = biweekly; m = monthly; and if seasonal service also indicated by Sp = Spring; Su = Summer; Fa = Fall; Wi = Winter.

(e) Identified by the materials collected by listing of the letter located by that material type. G = Grass Clippings; L = Leaves; F = Food; W = Wood; P = Paper; S = Municipal Sewage Sludge; A = Animal Waste/Bedding; M = Municipal Solid Waste; L1, L2 etc = as identified on page 29.

TABLE III-3

SOURCE SEPARATION OF POTENTIALLY HAZARDOUS MATERIALS:

Since improper disposal of nonregulated hazardous materials has the potential to create risks to the environment and human health, the following programs have been implemented to remove these materials from the county's solid waste stream.

Program Name	Service Area (a)	Public or Private	Collection Point (c)	Collection Frequency (d)	Materials Collected (e)	Program Management Responsibilities (b)		
						Development	Operation	Evaluation
Hillsdale County Household Hazardous Waste Program	Hillsdale County	Public	Drop-off	Annual	AR,AN,B1, B2,C,P,PS,U ,OT	2	2	2
Hillsdale Co. Clean Sweep Program	Hillsdale County	Public	Drop-off	1x/3 yrs.	PS	6	6	6

(a) Identified by where the program will be offered. If throughout the planning area, then listed by planning area; if only in specific counties, then listed by county; if only in specific municipalities, then listed by its name and respective county.

(b) Identified by 1= Designated Planning Agency; 2 = County Board of Commissioners; 3 = Department of Public Works; 4 = Environmental Group (Identified on page 27); 5 = Private Owner/Operator; 6 = Other (identified on page 27)

(c) Identified by c = curbside; d = drop-off; o = onsite; and if other, explained.

(d) Identified by d = daily; w = weekly; b = biweekly; m = monthly; and if seasonal service also indicated by Sp = Spring; Su = Summer; Fa = Fall; Wi = Winter.

(e) Identified by the materials collected by listing of the letter located by that material type. AR = Aerosol Cans; A = Automotive Products except Used Oil, Oil Filters & Antifreeze; AN = Antifreeze; B1 = Lead Acid Batteries; B2 = Household Batteries; C= Cleaners and Polishers; H = Hobby and Art Supplies; OF = Used Oil Filters; P = Paints and Solvents; PS = Pesticides and Herbicides; PH = Personal and Health Care Products; U = Used Oil; OT = Other Materials and identified.

TABLE III-4

PROPOSED RECYCLING:

Program Name	Service Area (a)	Public or Private	Collection Point (c)	Collection Frequency (d)	Materials Collected (e)	Program Management Responsibilities (b)		
						Development	Operation	Evaluation
Scipio Twp. Transfer Station	Scipio Twp.	Public	d	w	a,b,e,f	6	6	6
Ransom Twp. Transfer Station	Amboy, Ransom, and Woodbridge Twp.	Public	d	w	a,b,e,f	6	6	6
City of Hillsdale Transfer Station	City of Hillsdale	Public	d	d	a,b,c,d,e,f	6	6	6
City of Hillsdale Curbside Program	City of Hillsdale	Public	d	w	a,b,c,d,e,f	6	6	6
Fayette Twp. Transfer Station	Fayette Township	Public	d	w	a,b,c,d,e,f	6	6	6

(a) Identified by where the program will be offered. If throughout the planning area, then listed by planning area; if only in specific counties, then listed by county; if only in specific municipalities, then listed by its name and respective counties.

(b) Identified by 1= Designated Planning Agency; 2 = County Board of Commissioners; 3 = Department of Public Works; 4 = Environmental Group (Identified on page 27); 5 = Private Owner/Operator; 6 = Other (identified on page 27)

(c) Identified by c = curbside; d = drop-off; o = onsite' and if other, explained.

(d) Identified by d = daily; w = weekly; b = biweekly; m = monthly; and if seasonal service also indicated by Sp = Spring; Su = Summer; Fa = Fall; Wi = Winter.

(e) Identified by the materials collected by listing of the letter located by that material type. A = Plastics; B = Newspaper; C = Corrugated Containers; D = Other Paper; E = Glass; F = Metals; P = Pallets; J = Construction/Demolition; K = Tires; L1, L2 etc. = as identified on page 29.

TABLE III-5

PROPOSED COMPOSTING:

Program Name (if known)	Service Area	Public or Private	Collection Point	Collection Frequency	Materials Collected	Program Management Responsibilities		
						Development	Operation	Evaluation
City of Hillsdale	City of Hillsdale	Public	Drop-Off, Curbside	w/Sp,Su,Fa	G,L,W	3	3	3
City of Litchfield	City of Litchfield	Public	Drop-off, Curbside	m/Sp,Fa	G,L,W	3	3	3
Village of Jonesville	Village of Jonesville	Public	Drop-off, Curbside	m/Fa	G,L,W	3	3	3
Village of Waldron	Village of Waldron	Public	Drop-off, Curbside		G,L,W	3	3	3

(a) Identified by where the program will be offered. If throughout the planning area, then listed by planning area; if only in specific counties, then listed by county; if only in specific municipalities, then listed by its name and respective county.

(b) Identified by 1= Designated Planning Agency; 2 = County Board of Commissioners; 3 = Department of Public Works; 4 = Environmental Group (Identified on page 27); 5 = Private Owner/Operator; 6 = Other (identified on page 27)

(c) Identified by c = curbside; d = drop-off; o = onsite; and if other, explained.

(d) Identified by d = daily; w = weekly; b = biweekly; m = monthly; and if seasonal service also indicated by Sp = Spring; Su = Summer; Fa = Fall; Wi = Winter.

(e) Identified by the materials collected by listing of the letter located by that material type. G = Grass Clippings; L = Leaves; F = Food; W = Wood; P = Paper; S = Municipal Sewage Sludge; A = Animal Waste/Bedding; M = Municipal Solid Waste; L1, L2 etc = as identified on page 29.

TABLE III-6

PROPOSED SOURCE SEPARATION OF POTENTIALLY HAZARDOUS MATERIALS:

Program Name (if known)	Service Area	Public or Private	Collection Point	Collection Frequency	Materials Collected	Program Management Responsibilities		
						Development	Operation	Evaluation
None planned during the planning period, except if arrangements can be established for participation with another county.								

(a) Identified by where the program will be offered. If throughout the planning area, then listed by planning area; if only in specific counties, then listed by county; if only in specific municipalities, then listed by its name and respective county.

(b) Identified by 1= Designated Planning Agency; 2 = County Board of Commissioners; 3 = Department of Public Works; 4 = Environmental Group (Identified on page 27); 5 = Private Owner/Operator; 6 = Other (identified on page 27)

(c) Identified by c = curbside; d = drop-off; o = onsite; and if other, explained.

(d) Identified by d = daily; w = weekly; b = biweekly; m = monthly; and if seasonal service also indicated by Sp = Spring; Su = Summer; Fa = Fall; Wi = Winter.

(e) Identified by the materials collected by listing of the letter located by that material type. AR = Aerosol Cans; A = Automotive Products except Used Oil, Oil Filters & Antifreeze; AN = Antifreeze; B1 = Lead Acid Batteries; B2 = Household Batteries; C= Cleaners and Polishers; H = Hobby and Art Supplies; OF = Used Oil Filters; P = Paints and Solvents; PS = Pesticides and Herbicides; PH = Personal and Health Care Products; U = Used Oil; OT = Other Materials and identified.

SELECTED SYSTEM

IDENTIFICATION OF RESOURCE RECOVERY MANAGEMENT ENTITIES:

The following identifies those public and private parties, and the resource recovery or recycling programs for which they have management responsibilities.

Collection and disposal of wastes, and recycling activities are the responsibility of private refuse companies operating in Hillsdale County.

Composting programs are the responsibility of city public works departments in Hillsdale and Litchfield and the Villages of Jonesville and Waldron.

Environmental Groups:

There are no environmental groups in Hillsdale County who have management responsibilities in resource recovery or recycling.

Other:

The Hillsdale County Board of Commissioners is responsible for the education of the public regarding solid waste issues.

As manager of the Williams County, Ohio Landfill, Tri-State Waste Service offers recycling and resource recovery programs designed to ensure the proper disposal of municipal solid waste.

There are many businesses which provide recycling services to customers. These services are under the management of the individual business owners. Commercial recycling services are geared toward the customer, while manufacturers tend to orient their recycling efforts toward preserving and recycling the by-products of the manufacturing process.

SELECTED SYSTEM

PROJECTED DIVERSION RATES:

The following estimates the annual amount of solid waste which is expected to be diverted from landfills and incinerators as a result of the current resource recovery programs and in five and ten years.

Collected Material	Projected Annual Tons Diverted		
	Current	5th Year	10th Year
A. TOTAL PLASTICS:	9	12	18
B. NEWSPAPER:	96	128	192
C. CORRUGATED CONTAINERS	72	96	144
D. TOTAL OTHER PAPER:	108	144	216
E. TOTAL GLASS:	48	64	96
F. OTHER MATERIALS			
F1.			
F2.			

Collected Material	Projected Annual Tons Diverted		
	Current	5th Year	10th Year
G. GRASS & LEAVES:			
H. TOTAL WOOD WASTE:			
I. CONSTRUCTION AND DEMOLITION			
J. FOOD AND FOOD PROCESSING:			
K. TIRES:			
L. TOTAL METALS:	24	32	48
F3.			
F4.			

MARKET AVAILABILITY FOR COLLECTED MATERIALS:

The following identifies how much volume that existing markets are able to use of the recovered materials which were diverted from the county's solid waste stream.

Collected Material	In-State Markets	Total Out-of-State Markets
A. TOTAL PLASTICS:		9
B. NEWSPAPER:		96
C. CORRUGATED CONTAINERS:		72
D. TOTAL OTHER PAPER:		108
E. TOTAL GLASS:		48
F1.		
F2.		

Collected Material	In-State Markets	Total Out-of-State Markets
G. GRASS AND LEAVES		
H. TOTAL WOOD WASTE:		
I. CONSTRUCTION AND DEMOLITION:		
J. FOOD AND FOOD PROCESSING:		
K. TIRES:		
L. TOTAL METALS:		24
F3.		
F4.		

SELECTED SYSTEM

EDUCATIONAL AND INFORMATIONAL PROGRAMS:

It is often necessary to provide educational and informational programs regarding the various components of a solid waste management system before and during its implementation. These programs are offered to avoid miscommunication which results in improper handling of solid waste and to provide assistance to the various entities who participate in such programs as waste reduction and waste recovery. Following is a list of the programs offered or proposed to be offered in this county.

Program Topic (a)	Delivery Medium (b)	Target Audience (c)	Program Provider (d)
1,2,3,4,5	W, OT (Website)	5,6	EX

(a) Identified by 1 = recycling; 2 = composting; 3 = household hazardous waste; 4 = resource conservation; 5 = volume reduction; 6 = other which is explained.

(b) Identified by w = workshop; r = radio; t = television; n = newspaper; o = organizational newsletters; f = flyers; e = exhibits and locations listed; and ot = other which is listed.

(c) Identified by p = general public; b = business; i = industry; s = students with grade levels listed. In addition if the program is limited to a geographic area, then that county, city, village, etc. is listed.

(d) Identified by EX = MSU Extension; EG = Environmental Group (identify name); OO = Private Owner/Operator (identify name); HD = Health Department (identify name); DPA = Designated Planning Agency; CU = College/University (identify name); LS = Local School (identify name); ISD = Intermediate School District (identify name); O = Other which is explained.

SELECTED SYSTEM

TIMETABLE FOR SELECTED SYSTEM IMPLEMENTATION

This timetable is a guideline to implement components of the selected system. The timeline gives a range of time in which the component will be implemented such as "1995-1999" or "on-going". Timelines may be adjusted later, if necessary.

The following table presents information on the timetable for implementing components of the Solid Waste Plan:

TABLE III-7

Management Components	Timeline
Educational programs (recycling, waste reduction, composting, etc.)	Ongoing
Waste hauling	Ongoing
Transfer stations	Ongoing
Composting	Ongoing

SELECTED SYSTEM

SITING REVIEW PROCEDURES

AUTHORIZED DISPOSAL AREA TYPES

The following solid waste disposal area types may not be sited by this plan. Any proposal to construct a facility listed herein shall be deemed inconsistent with this plan.

Because Hillsdale County has sufficient capacity to dispose the waste it generates during the ten year planning period at the Williams County, Ohio Landfill, there will be no need for a Type II Sanitary Landfill to be sited in the County. No landfill disposal facility shall be sited in Hillsdale County during the planning period.

As noted on page II-2 of this plan, the County generates approximately 62,328 tons of municipal refuse per year which requires landfill disposal. The Williams County facility has the capacity to receive this waste easily over the planning period (documentation provided on page D-3).

SITING CRITERIA AND PROCESS

The following process describes the criteria and procedures to be used to site solid waste disposal facilities and determine consistency with this plan.

Due to the lack of a need to site a solid waste disposal facility, this does not apply. Hillsdale County has assurances from the Williams County Landfill that 10-year capacity exists at the landfill for Hillsdale County Waste.

Type B Transfer stations owned and / or operated by local units of government and associated recycling centers are encouraged in the County to reduce the volume of waste requiring landfilling.

At the current time, cities and townships make individual decisions regarding the collection, transport, and disposal of solid wastes.

This Plan permits the enforcement of local zoning with respect to transfer stations and recycling centers to the extent that they impose reasonable regulations on location, screening, fencing, lighting, and signage.

SELECTED SYSTEM

SOLID WASTE MANAGEMENT COMPONENTS

The following identifies the management responsibilities and institutional arrangements necessary for the implementation of the selected waste management system. Also included is a description of the technical, administrative, financial and legal capabilities of each identified existing structure of persons, municipalities, counties and state and federal agencies responsible for solid waste management including planning, implementation, and enforcement.

Hillsdale County's Solid Waste Management System is based upon the use of the Williams County Landfill, owned and operated by Tri-State Waste, Inc. in Bryan, Ohio as the primary receiver of Hillsdale County waste over the entire planning period. Waste within Hillsdale County is collected solely by private haulers. Some waste, such as that collected within the City of Hillsdale, is collected by contract with a specific hauler. Throughout the County, smaller transfer stations have been established to collect and dispose of wastes. These transfer stations are publicly owned, and operated with the exception of the City of Hillsdale transfer station which is operated by Tri-State Waste, Inc.

Most transfer stations including those located within the City of Hillsdale and in Fayette Township offer recycling capability as well, primarily handled by Tri-State Waste, Inc. Tri-State also offers curbside recycling within the City of Hillsdale.

Hillsdale is well-located with respect to disposal facilities. In addition to the Williams County Landfill located to the south in Ohio, landfills are located in Calhoun, Jackson, and Lenawee Counties, which immediately surround Hillsdale County.

All technical, administrative, financial, and legal capabilities reside within the private sector, with the exception of some of the smaller transfer stations which are publicly owned and operated. All collection is privately owned and operated. Collection and disposal are regulated by the states of Michigan and Ohio. While technical, administrative, financial, and legal capabilities of each of these entities is unknown, they consist primarily of large corporations which have been in business for several years, and which have operated in a stable fashion.

Solid waste management planning is the responsibility of the Hillsdale County Board of Commissioners, the designated planning agency. The Board of Commissioners appoints a Solid Waste Management Planning Committee. Implementation of the plan is the responsibility of the Board of Commissioners working with private sector entities. In some cases, such as the need for educating the public on waste reduction, reuse, and recycling, the Board of Commissioners relies on other public entities such as the Michigan State University Cooperative Extension Service, the Region 2 Planning Commission, the Michigan Department of Environmental Quality, and other agencies.

SELECTED SYSTEM

IDENTIFICATION OF RESPONSIBLE PARTIES

Document which entities within the county will have management responsibilities over the following areas of the plan.

Resource Conservation:

Source or Waste Reduction - Hillsdale County Board of Commissioners (BoC)

Product Reuse - BoC

Reduced Material Volume - BoC

Increased Product Lifetime - BoC

Decreased Consumption - BoC

Resource Recovery Programs:

Composting - BoC, City of Hillsdale Public Works Department, City of Litchfield Public Works Department, Jonesville, Waldron

Recycling - BoC, Tri-State Waste Services, BFI

Energy Production - None

VOLUME REDUCTION TECHNIQUES: BoC

COLLECTION PROCESSES: BoC, licensed haulers

SELECTED SYSTEM

Transportation: BoC

Disposal Areas:

Processing Plants - BoC

Incineration - None

Transfer Stations - Hillsdale, Jefferson, Camden, Reading, Ransom, and Scipio Transfer Stations

Sanitary Landfills - Tri-State Waste Services, Inc.

Ultimate Disposal Area Uses: BoC, Tri-State Waste Services

Local Responsibility for Plan Update Monitoring & Enforcement: BoC

Educational and Informational Programs: BoC

Documentation of acceptance of responsibilities is contained in Appendix D.

LOCAL ORDINANCES AND REGULATIONS AFFECTING SOLID WASTE DISPOSAL

This plan update's relationship to local ordinances and regulations within the county is described in the option(s) marked below:

_X_ 1. Section 11538.(8) and rule 710 (3) of Part 115 prohibits enforcement of all county and local ordinances and regulations pertaining to solid waste disposal areas unless explicitly included in an approved solid waste management plan. Local regulations and ordinances intended to be part of this plan must be specified below and the manner in which they will be applied described.

____ 2. This plan recognizes and incorporates as enforceable the following specific provisions based on existing zoning ordinances:

____ 3. This plan authorizes adoption and implementation of local regulations governing the following subjects by the indicated units of government without further authorization from or amendment to the plan.

As long as landfills are available in surrounding counties for the receipt of Hillsdale County Solid Waste over the ten-year planning period, landfill development in Hillsdale County is prohibited. Any local ordinance which governs landfill development or operation shall be deemed in conflict and inconsistent with this plan and shall not be enforceable.

Local governmental zoning regulations applicable to transfer centers and recycling centers may be adopted and implemented without additional authorization form, or formal amendment to, the Solid Waste Management Plan. Allowable regulations shall include any such regulations authorized under State of Michigan Zoning enabling legislation for cities and villages, and townships.

CAPACITY CERTIFICATIONS

Every county with less than ten years of capacity identified in their plan is required to annually prepare and submit to the DEQ an analysis and certification of solid waste disposal capacity validly available to the county. This certification is required to be prepared and approved by the county board of commissioners.

[x] This county has more than ten years capacity identified in this plan and an annual certification process is not included in this plan.
(See page D-3 of this plan)

[ ] Ten years of disposal capacity has not been identified in this plan. The county will annually submit capacity certifications to the DEQ by June 30 of each year on the form provided by the DEQ. The county's process for determination of annual capacity and submission of the county's capacity certification is as follows:

APPENDIX A

ADDITIONAL INFORMATION

REGARDING THE

SELECTED

SYSTEM

EVALUATION OF RECYCLING

The following provides additional information regarding implementation and evaluations of various components of the selected system.

Community recycling programs have been difficult to establish in Hillsdale County. Communities have found it impractical to operate recycling programs because disposal costs are low and labor costs are high. Recycling costs can be minimized through the use of volunteers and having disposal costs accrued to the agent responsible for collection and transportation of the waste.

However, Hillsdale County relies on the private sector to develop and operate recycling programs. Both curbside collection and drop-off services are offered.

DETAILED FEATURES OF RECYCLING AND COMPOSTING PROGRAMS:

List below the types and volumes of material available for recycling or composting.

The following table illustrates the potential for recycling and composting in Hillsdale County in 1998. The table is based on the DNR Solid Waste Stream Assessment and waste stream estimates found in Section II of this plan. These are based on the 1993 estimates for municipal solid waste generation in Hillsdale County. In Section II of the Plan, it was estimated that 65,892 tons of municipal solid waste were generated in Hillsdale County in 1998.

Category	% of Municipal Solid Waste Tonnage[1]	Amount Available for Recycling/Composting (Tons)
Paper and Paperboard		3,577
Glass		2,464
Metals		3,066
Plastics		1,697
TOTAL		10,804

Therefore, 10,804 tons was the optimum recycling tonnage for Hillsdale County in 1993.

In Section II of this Plan, it was estimated that 7,454 tons of yard waste were generated in Hillsdale County in 1998. Very little yard waste is disposed of in the landfills due to Michigan Law which bans such practices. Several communities in the County offer composting services to their citizens.

The following briefly describes the processes used or to be used to select the equipment and locations of the recycling and composting programs included in the selected system. Difficulties encountered during past selection processes are also summarized along with how those problems were addressed:

Equipment Selection

Existing Programs: Local units of government have purchased recycling and composting equipment or have equipment that serves both recycling and/or composting.

Proposed Programs: New equipment will be purchased as necessary, however, most new equipment purchased will be made for equipment that has versatility for general use.

Site Availability & Selection

Existing Programs: Local units of government have selected locations for recycling and composting operations in the past. These determinations, due to the scale of operations and the limited impact, have not drawn opposition.

Proposed Programs: While expansion of existing programs in recycling and composting operation are anticipated, it is not expected that additional sites will be required within the planning period. Should such sites be necessary for acquisition, opposition is not anticipated.

Composting Operating Parameters:

The following identifies some of the operating parameters which are to be used or are planned to be used to monitor the composting programs.

Existing Programs:

Program Name	pH Range	Heat Range	Other Parameter	Measurement Unit
City of Hillsdale				
City of Litchfield				
Village of Jonesville				
Village of Waldron				

Note: Hillsdale County composting programs are relatively small. Operating parameters have not been established or planned.

Proposed Programs:

Program Name	pH Range	Heat Range	Other Parameter	Measurement Unit
City of Hillsdale				
City of Litchfield				
Village of Jonesville				
Village of Waldron				

COORDINATION EFFORTS:

Solid waste management plans need to be developed and implemented with due regard for both local conditions and the state and federal regulatory framework for protecting public health and the quality of the air, water, and land. The following states the ways in which coordination will be achieved to minimize potential conflicts with other programs and, if possible, to enhance those programs.

It may be necessary to enter into various types of arrangements between public and private sectors to be able to implement the various components of this solid waste management system. The known existing arrangements are described below which are considered necessary to successfully implement this system within the county. In addition, proposed arrangements are recommended which address any discrepancies that the existing arrangements may have created or overlooked. Since arrangements may exist between two or more private parties that are not public knowledge, this section may not be necessary to cancel or enter into new or revised arrangements as conditions change during the planning period. The entities responsible for developing, approving, and enforcing these arrangements are also noted.

The responsibility for the Hillsdale County solid waste management program rests with the Hillsdale County Board of Commissioners (BOC).

The Hillsdale County Board of Commissioners shall be responsible for the following:

- Recycling/solid waste education
- Implementation of the recycling and composting plans contained within this solid waste management plan
- Ensuring that adequate waste disposal areas are provided in a timely manner to meet the county's waste disposal needs
- Support local units of government with recycling and composting programs. Continue to provide financial assistance for this purpose if funds become available.
- Develop a household hazardous waste collection program if an arrangement can be established with an adjacent county and funding is available.

COSTS & FUNDING:

The following estimates the necessary management, capital, and operational and maintenance requirements for each applicable component of the solid waste management system. In addition, potential funding sources have been identified to support those components.

The following table contains estimated costs and potential funding sources of various components of the solid waste management program.

System Component	Estimated Costs	Potential Funding Sources
Resource Conservation Efforts		
Resource Recovery Programs		
Volume Reduction Techniques		
Collection Processes		
Transportation		
Disposal Areas		
Future Disposal Area Uses		
Management Arrangements		
Educational & Informational Programs	$1,000.00	BoC

Because the Hillsdale County Solid Waste program is based in the private sector, the funding of components of the program remains a private sector responsibility.

The cost of educational programs on reduction, re-use, and recycling are anticipated to be borne by the MDEQ, Cooperative Extension, and other governmental utilities.

EVALUATION SUMMARY OF THE SELECTED SYSTEM:

The solid waste management system has been evaluated for anticipated positive and negative impacts on the public health, economics, environmental conditions, siting considerations, existing disposal areas, and energy consumption and production which would occur as a result of implementing this selected system. In addition, the selected system was evaluated to determine if it would be technically and economically feasible, whether the public would accept this selected system, and the effectiveness of the educational and informational programs. Impacts to the resource recovery programs created by the solid waste collection system, local support groups, institutional arrangements, and the population in the county in addition to market availability for the collected materials and the transportation network were also considered. Impediments to implementing the solid waste management system are identified and proposed activities which will help overcome those problems are also addressed to assure successful programs. The selected system was also evaluated as to how it relates to the Michigan Solid Waste Policy's goals. The following summarizes the findings of this evaluation and the basis for selecting this system:

Several alternatives were evaluated to determine the best approach for the disposal of Hillsdale County's municipal solid waste. The alternative selected makes use of enhanced recycling and waste reduction processes and landfilling to dispose of waste which cannot be easily recycled or eliminated through waste reduction. Hillsdale County currently has six transfer stations which have, or are capable of, recycling capability. Waste is delivered by residents to these facilities and recycling is, or can easily be made a component of, the waste disposal process. Within the City of Hillsdale, waste is collected from residences under a contract to a specific hauler. It is possible within the City to develop a source separation program to implement recycling. A similar source separation program is possible for implementation with solid waste haulers serving the balance of the county.

Waste that cannot be recycled is disposed in landfills located outside Hillsdale County. Hillsdale County has no Type II or Type III waste disposal landfills within its borders. Almost all of Hillsdale County's Type II waste that cannot be recycled is disposed in the Williams County Landfill located north of Bryon, Ohio. This landfill has indicated the capacity to accept Hillsdale County waste for a period exceeding ten years. Small amounts of Hillsdale County Type II waste are disposed in landfills in surrounding counties. In addition, Type III disposal facilities are also located in landfills surrounding Hillsdale County. The following is an evaluation summary of this system with regard to specific criteria as requested by the Michigan Department of Environmental Quality.

1. Anticipated positive and negative impacts on the solid waste management system.

   A. Public Health -- No negative impact on the public health is expected as a result of the implementation of the Solid Waste Management Plan. Potential problems

associated with landfill operation including groundwater contamination and the need for the daily cover of solid waste are under the jurisdiction and control of landfill operators in landfills outside Hillsdale County and the two states (Ohio and Michigan) which regulate them. The Plan does not affect landfill operation. In terms of the collection of solid waste, the current system of private haulers offers collection services throughout the County on at least a weekly basis. In addition, drop-off services are available at the Hillsdale Transfer station on normal business days.

B. Economics -- Plan implementation is not anticipated to significantly effect the cost of solid waste disposal to landfill operators, haulers, recyclers, or the public.

C. Environmental Condition -- Hillsdale County's environment will not be negatively affected by the Solid Waste Management Plan implementation due to ultimate disposal outside the County.

D. Siting Considerations -- The Plan calls for a continuation of disposal in landfills located outside the County. Several of these landfills have substantial capacity. No siting mechanism is required for the foreseeable future.

E. Existing Disposal Areas -- Disposal facilities which currently receive Hillsdale County waste are anticipated to continue. Slight increases in the amount of solid waste generated are anticipated. These are expected to be inconsequential due to expanding recycling programs and efforts at the reduction in solid waste.

F. Energy Consumption and Production -- Since incineration is not incorporated as a disposal option, there will be no energy produced through disposal. The collection system within the County makes use of some disposal through transfer stations. Additional energy consumption in a collection system is anticipated to be insignificant.

2. Technical and Economic Feasibility.

Because the Plan calls for a continuation of the existing solid waste disposal system, there is not expected to be any problems associated with technical or economic feasibility. No substantial increases in capital costs are anticipated to dispose of Hillsdale County's waste.

3. Public Acceptability.

Because the Plan calls for a continuation of the existing solid waste disposal system, which includes disposal of facilities outside the county, the Plan for solid waste disposal is expected to be supported by the public.

4. Effectiveness of Education and Information Systems.

The Plan calls for an enhancement of public education regarding the generation of solid waste, and the use of recycling. The Hillsdale County Board of Commissioners has the responsibility to make such information available to citizens of Hillsdale County. The County Board will rely on information developed by the Michigan Department of Environmental Quality and State and national environmental organizations on matters of home composting, proper disposal, and recycling. This information is to be distributed through existing networks existing within the County including primarily, the Cooperative Extension Service, local media, and the voluntary efforts of haulers. The implementation of additional programs are limited by fund availability.

5. Impacts of the Solid Waste Management Plan.

A. Resource Recovery Programs -- The Plan calls for enhanced resource recovery through recycling, and is, therefore, expected to impact resource recovery positively.

B. Local Support Groups -- Local support groups were initially involved in the development of recycling programs in Hillsdale County. Now that these programs have been institutionalized, support groups are less involved and appear comfortable with plan provisions which call for enhanced recycling.

C. Institutional Arrangements -- The Plan is not expected to affect institutional arrangements in the collection or disposal of solid waste or recyclable materials.

6. Population.

Methods of collection and disposal which rely on collection by private haulers and through transfer stations, and disposal at landfill facilities outside the County are expected to serve the Hillsdale County population over the foreseeable future. No negative impact is anticipated as a result of plan implementation.

7. Market Availability for Collected Materials.

The Plan calls for increases in recycling over time. Because recycling programs currently exist and a market for recyclable materials has been developed, it is believed that slight increases in these materials can be accommodated within the existing system. Hopefully, as recycling becomes more popular nationally, additional uses will be developed for recycled materials and increased demand will result in a higher financial return for recycled materials.

8. Impediments to Implementation.

Hillsdale County's Plan relies on the private sector for implementation. Both the collection system and the disposal system make use of privately owned firms. The County is, therefore, vulnerable in the sense that it does not control the collection system or solid waste disposal with its own capital equipment or facilities.

9. Hillsdale County Plan Contribution to State Solid Waste Policy and Goals.

A. Waste Reduction -- Michigan's goal is a reduction of from 8-12% of the solid waste stream. The Hillsdale County Plan calls for enhanced public education regarding the reduction of solid waste.

B. Reuse -- The Michigan policy goal for reuse is 4-6% of the solid waste stream. Hillsdale County, through its educational program, will attempt to advise citizens of opportunities for the reuse of materials to reduce generation.

C. Composting -- The Michigan goal is for composting to reduce the solid waste stream by 8-12%. The Hillsdale County Plan supports composting, both at the household and community levels. Several communities within the County are currently composting leaves and brush for citizens through municipal collection systems and citizen drop off.

D. Recycling -- The State recycling goal is to reduce the volume of solid waste by 20-30% of the municipal waste stream. Hillsdale County currently recycles substantial amounts of solid waste through municipal collection systems and citizen drop off at transfer stations. This activity is encouraged through the Plan.

E. Incineration with Energy Recovery or Waste to Energy -- The waste to energy goal of the State of Michigan is the reduction of 35-45% of the solid waste stream. Currently, the Hillsdale Plan does not call for incineration. If incineration would be considered on a regional basis, the County Solid Waste Plan could be adjusted for County participation depending upon economic feasibility and positive environmental impact.

F. Landfilling -- The goal of the State in landfilling is a reduction to 10-20% of the waste stream. Although Hillsdale County's Plan calls for a continuation of disposal through landfilling, a reduction of the waste stream being landfilled is a major objective of the Plan through reduction, reuse, composting, and recycling.

ADVANTAGES AND DISADVANTAGES OF THE SELECTED SYSTEM:

Each solid waste management system has pros and cons relating to its implementation within the county. Following is an outline of the major advantages and disadvantages for this selected system.

ADVANTAGES:

1. Hillsdale County is familiar with the existing system and accepts it. The system works well.

2. Solid waste services are provided at a reasonable cost to consumers.

3. Retaining the current system will not require additional public infrastructure.

4. Hillsdale County has several landfills located in adjacent counties which have sustained waste disposal capacities.

5. There are abundant opportunities for recycling in the County. Several drop-off sites are available.

6. Education and widespread opportunities to recycle will encourage future generations to recycle.

7. The private sector is well-established and currently operates recycling programs.

8. The population center of the County is coterminous with the geographic center of the County.

DISADVANTAGES:

1. The County must rely on landfills located outside its borders.

2. The market for recyclables is unpredictable.

3. The inconvenience of recycling is not offset by financial incentives to recycle.

4. Travel distances for final disposal are out of County.

5. Population densities are low.

6. The County must depend on the private sector for recycling program development.

NON-SELECTED

SYSTEMS

Before selecting the solid waste management system contained within this plan update, the county developed and considered other alternative systems. The details of the non-selected systems are available for review in the county's repository. The following section provides a brief description of these non-selected systems and an explanation why they were not selected. Complete one evaluation summary for each non-selected alternative system.

A complete description and analysis of non-selected systems may be found beginning on page A-7.

PUBLIC PARTICIPATION

AND APPROVAL

The following summarizes the processes which were used to the development and local approval of the plan including a summary of public participation in those processes, documentation of each of the required approval steps, and a description of the appointment of the solid waste management planning committee along with the members of that committee.

PUBLIC PARTICIPATION

PUBLIC INVOLVEMENT PROCESS: A description of the process used, including dates of public meeting, copies of public notices, documentation of approval from the solid waste planning committee, county board of commissioners, and municipalities.

During the preparation of this Solid Waste Management Plan Update for Hillsdale County, the Solid Waste Committee met in public meetings at the following times at the MSU Extension Office located at 20 Core Drive, Hillsdale, Michigan 49242:

Thursday, March 5, 1998 @ 7:00 p.m.
Thursday, April 16, 1998 @ 7:00 p.m.
Thursday, May 21, 1998 @ 7:00 p.m.
Thursday, June 18, 1998 @ 7:00 p.m.
Thursday, August 13, 1998 @ 7:00 p.m.
Thursday, October 8, 1998 @ 7:00 p.m. (No quorum)
Thursday, February 18, 1999 @ 7:00 p.m.
Thursday, May 20, 1999 @ 7:00 p.m.
Wednesday, May 24, 2000 @ 7:00 p.m.

The Hillsdale County Solid Waste Management Planning Committee was appointed at a regular meeting of the Hillsdale County Board of Commissioners on February 11, 1998.

The 90 - day comment period was initiated by public notice on July 22,1999 and ended October 18, 1999. (See pages C -2.1 for a copy of the public notice.

Public hearings were held on August 10, 1999 at 2:30 p.m. and September 14, 1999 at 7:00 p.m. Both hearings were held at the MST Extension Office located at 20 Core Drive, Hillsdale, Michigan 49242. (See pages C - 2.1 and C - 2.3 for the record of each hearing).

PUBLIC NOTICE

The Hillsdale County Board of Commissioners, acting as the designated Solid Waste Management Planning Agency for Hillsdale County, hereby provides public notice of a proposed update to the Hillsdale County Solid Waste Management Plan. The purpose of the Solid Waste Management Plan update is to assess current solid waste management processes and activities within the County and to set forth a plan for the disposal of Hillsdale County solid waste for the period of time between plan adoption and the year 2004. The proposed Hillsdale County Solid Waste Management Plan update may be viewed at the Hillsdale County Clerk's office located at 29 N. Howell Street, Room 1, Hillsdale, Michigan 49242. Comments will be received during a 90-day review and comment period. All comments shall be made in writing and may be mailed or delivered in person to the Hillsdale County Clerk's office. This 90-day comment period shall expire on October 18, 1999. A public hearing on the Hillsdale County Solid Waste Management Plan update will be held on two occasions:

1. August 10, 1999 at 2:30 p.m., and:

2. September 14, 1999 at 7:00 p.m., at the MSU Extension Office located 20 Care Drive, Hillsdale, Michigan 49242.

The Public Hearing scheduled by the Hillsdale County Board of Commissioners concerning the Solid Waste Management Plan convened at 2:30 p.m. at the Michigan State University Extension Conference Room, 20 Care Drive, Hillsdale, Michigan with all Commissioners present.

Present: Deb Coffing and Chuck Risedorf.

C/Lautzenheiser called the meeting to order at 2:30 p.m..

2:31 p.m. C/Null moved to open the Public Hearing. Support by C/Britton. Vote unanimous. CARRIED

C/Lautzenheiser turned the meeting over to Mr. Risedorf. Mr. Risedorf informed the Board that they are currently in the 90 day comment period and if all goes well and all comments are in from the local units and the Department of Environmental Quality (DEQ), the plan should be in place by the end of December 1999. Mr. Risedorf did explain the DEQ was behind on their comments.

2:45 p.m. C/Null moved to close the Public Hearing. Support by C/Steel. Vote unanimous. CARRIED

2:46 p.m. C/Lautzenheiser called a recess until 3:00 p.m..

The regular meeting of the Hillsdale County Board of Commissioners convened at the Michigan State University Extension Conference Room, 20 Care Drive, Hillsdale, Michigan on August 10, 1999.

Commissioners Lautzenheiser called the meeting to order at 3:00 p.m.. Prayer by Commissioner Steel.

ROLL CALL:	DISTRICT:	PRESENT:	ABSENT:
	1.	Tom Warzecha	
	2.	David Steel	
	3.	Robert Null	
	4.	Alice Britton	
	5.	Kenneth Lautzenheiser	

AGENDA:

1. Roll Call
2. Prayer & Pledge by Commissioner Steel
3. Approval of Regular Mtg. Minutes of July 7, 1999
4. Approve Agenda
5. Public Comment
6. Correspondence - Listed
7. Appointments:

3:15 p.m.	David Dinkleman, District Court, District Court Staffing
3:30 p.m.	Marc Richards, Gypsy Moth Coordinator & Mark Williams, Extension Director, Gypsy Moth Report
3:45 p.m.	Hillsdale Co. Road Commissioners, Audit Extension

Committee Reports:

A. **HUMAN SERVICES - TOM WARZECHA**
B. **FINANCE/MANAGEMENT - ALICE BRITTON**
C. **PUBLIC SAFETY/JUDICIARY - DAVID STEEL**
D. **PUBLIC WORKS/PLANNING - ROBERT NULL**
   1. 99-055: Approval of PA-116 Application
E. **CHAIRPERSON'S REPORT**

8. Old Business

The Public Hearing of the Hillsdale County Board of Commissioners convened on September 14, 1999 at 7:00 p.m. at the Michigan State University Extension Conference Room, 20 Care Drive, Hillsdale, Michigan with all Commissioners Present.

Present: Ralph Heibutzki, Deb Coffing, Charles Risedorf and Fern Grimm.

C/Lautzenheiser called the Public Hearing to Order at 7:00 p.m.. He informed all who were present that this Hearing was for the purpose of accepting any comments in regards to the Sold Waste Plan. He then turned the hearing over to Charles Risedorf.

Mr. Risedorf gave a brief overview of what the Solid Waste Plan is and why it needs to be done and what it includes. There was some discussion.

Mr. Risedorf informed the Board that the letter received from the Michigan Waste Industries Association will need to be considered at the close of the comment period. Mr. Risedorf will then inform the Board as to what needs to be done.

7:20 p.m. C/Warzecha moved to adjourn. Support by C/Steel. Vote unanimous.
CARRIED

Kenneth E. Lautzenheiser, Chair
Board of Commissioners

Thomas C. Mohr,
County Clerk

RECEIVED SEP 0 7 1999

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LANSING, MICHIGAN

September 2, 1999

RECEIVED
SEP 0 9 1999
R2PC

Ms. Amy Brown
Hillsdale County Solid Waste Planning Committee
County Courthouse
29 North Howell
Hillsdale, MI 49242

RE: Hillsdale County Solid Waste Management Plan Update

Dear Ms. Brown:

We are attorneys representing the Michigan Waste Industries Association ("MWIA"). MWIA is a Michigan nonprofit corporation representing approximately 50 individual Michigan-based solid waste companies, some of which operate within Hillsdale County. MWIA submits the enclosed document ("Comments") for inclusion in the administrative record of public comments on Hillsdale County's draft solid waste management plan update (the "Plan"). The Comments address MWIA's concerns with certain provisions that may be contained in the Plan that exceed Hillsdale County's authority. Hillsdale County does not have unlimited authority to include provisions in a solid waste management plan. Rather, Hillsdale County only has such powers that have been granted by the Michigan Legislature. Although the Legislature authorized Hillsdale County to prepare a solid waste management plan under Part 115 of the Natural Resources and Environmental Protection Act ("Part 115"), Hillsdale County may only include in the Plan those provisions that are expressly identified in Part 115 or the administrative rules promulgated by the Michigan Department of Environmental Quality ("MDEQ") under Part 115 (the "Part 115 Rules"). The provisions discussed in the Comments are clearly not authorized under Part 115 or the Part 115 Rules.

To the extent the Plan contains any of the provisions discussed in the Comments, or incorporates such provisions into the Plan by reference to other documents, MWIA requests that Hillsdale County either: (1) revise the Plan to eliminate the offending provisions; or (2) provide a written response to MWIA's concerns in the Plan's appendix, as required by Rule 711(g) of the Part 115 Rules, which sets forth the basis for retaining such provisions in the Plan. Feel free to call me with any questions regarding MWIA's Comments.

Sincerely,

Jeffrey L. Woolstrum

cc: Mr. Jim Sygo, Chief Waste Management Division, MDEQ
Mr. Terry Guerin, President -- MWIA

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MICHIGAN WASTE INDUSTRIES ASSOCIATION
GENERAL COMMENTS ON
COUNTY SOLID WASTE MANAGEMENT PLAN UPDATES

Michigan Waste Industries Association ("MWIA") submits the following general comments on the contents of solid waste management plan updates that are currently being prepared by various counties under the authority of Part 115 of the Natural Resources and Environmental Protection Act ("Part 115") and the administrative rules promulgated thereunder (the "Part 115 Rules"). The discussion contained in this document is divided into two main sections. The first section discusses a county's limited authority to regulate matters in general, and the Legislature's narrow delegation of authority under Part 115 to include provisions in a solid waste management plan. In light of this narrow delegation of authority, the second section reviews eleven provisions that have appeared in one or more of the draft solid waste management plan updates. These eleven provisions generally relate to:

1 • disposal fees;

2 • disposal area operating criteria;

3 • mandated recycling;

4 • mandated data collection;

5 • preservation of more than 10 years of disposal capacity;

6 • disposal area volume caps;

7 • identification of specific disposal areas that may accept county waste;

8 • restrictions on special waste importation;

9 • enforcement activities by uncertified health departments;

10 • transporter licensing; and

11 • the severablity of unlawful plan provisions without a formal plan amendment.

MWIA contends that these provisions exceed the limited authority that has been delegated to the counties under Part 115. Further, because the Michigan Department of Environmental Quality ("MDEQ") can only approve or disapprove a county solid waste management plan without conditions, MWIA contends that MDEQ cannot approve a plan that contains one or more of these offending provisions.

I. PERMISSIBLE CONTENTS OF COUNTY SOLID WASTE MANAGEMENT PLANS

Although Part 115 authorizes counties, among other government entities, to prepare solid waste management plans, counties do not have carte blanch to include any provision related to solid waste in their plans. To the contrary, counties must work within the narrow confines of the Legislature's delegation of authority under Part 115. Thus, when reviewing a plan submitted by a county for final approval, MDEQ must *not* ask, "does Part 115 *prohibit* this particular provision." Rather, MDEQ must ask whether a specific section of Part 115 or the Part 115 Rules *clearly authorizes* each provision included in a solid waste management plan including each

provision incorporated by reference into the plan. If the answer to that question is not an unqualified "yes," MDEQ must deny approval of the plan.

A. COUNTIES ONLY POSSESS DELEGATED POWERS AND CANNOT REGULATE FOR THE HEALTH AND SAFETY OF THEIR RESIDENTS

MWIA's comments on the contents of solid waste management plans are rooted in the fact that Michigan counties have delegated powers only and do not have any inherent power to regulate for purposes of the public's health, safety and general welfare. A "county has only such powers as have been granted to it by the Constitution or the state Legislature." *Alan v. Wayne Co.*, 388 Mich. 210, 245 (1972); *Berrien Co. Probate Judges v. Michigan Am. Fed'n of State, Co. & Mun. Employees Council 25*, 217 Mich. App. 205 (1996). Where counties have been clearly delegated such powers, the Michigan Constitution provides that the powers "shall be liberally construed in [the counties'] favor" and that "[p]owers granted to counties . . . shall include those fairly implied and not prohibited by this constitution." Const. 1963, art. VII, § 34. This constitutionally imposed rule of interpretation, however, is not an independent grant of authority. "As these provisions are not self-executing, the rights which they bestow and the duties which they impose may not be enforced without the aid of legislative enactment." *County Comm'r of Oakland Co. v. Oakland Co. Executive*, 98 Mich. App. 639, 646 (1980). Thus, counties have no inherent authority to include provisions in solid waste management plans without clear authorization by Legislature under Part 115.

The Office of the Attorney General ("AG") has consistently opined that counties are without authority to regulate matters that have not been clearly delegated by the Legislature. For example, the AG most recently opined that a non-charter county does not have authority to regulate the emissions from a municipal waste incinerator. OAG, 1998, No. 6,992 (Aug. 13, 1998). In that opinion, the AG first noted that townships, cities and villages *have* been granted authority by the Michigan Legislature to adopt ordinances for the purpose of protecting the public's health, safety and general welfare. Therefore, the AG opined that a township, city or village *may* adopt an air pollution control ordinance, provided that it is reasonably related to this purpose. For counties, however, the AG noted that, while chartered counties are expressly authorized by statute to adopt ordinances to abate air pollution, *the Legislature "has not seen fit to grant this power to noncharter counties."* *Id.*, slip op. p. 3 (emphasis added). The AG concluded that a "noncharter county is thus not authorized to adopt an air pollution ordinance." *Id*; *see also*, OAG, 1969-1970, No. 4,696, p. 197 (Nov. 25, 1970) (county could not adopt air pollution control ordinance because no Michigan statute authorized a non-chartered county to abate air pollution and county ordinance would interfere with local affairs of villages and townships). This opinion is particularly significant with respect to solid waste management plans prepared under Part 115 because a municipal waste incinerator is a disposal area that must be consistent with such a plan. *See* M.C.L. § 324.11529(4).

Other AG opinions express a similar narrow view of a county's authority to regulate in the absence of clear enabling legislation. In OAG, 1989-1990, No. 6,665, p. 401 (Nov. 15, 1990), the AG opined that counties lacked the general authority to regulate the location of cigarette vending machines because such a county ordinance would interfere with the authority of the villages and townships to regulate such matters. In OAG, 1979-1980, No. 5,617, p. 526 (Dec. 28, 1979), the AG opined that a county could not adopt the Michigan Vehicle Code as

an ordinance because "[t]he adoption of the motor vehicle code by a county would not be consistent with the legislative intention [to grant certain exclusive powers to the county road commission], would have the effect of contravening the general laws of the state, and of extending or increasing the powers or jurisdiction of a county board of commissioners." In OAG, 1977-1978, No. 5,341, p. 556 (July 31, 1978), the AG opined that a county had no authority to operate a spay and neuter clinic for dogs and cats because "[n]o provision of the [Michigan Dog Law] specifically or impliedly authorizes a county to establish and maintain a spay and neuter clinic and cats are not mentioned in either the title or body of the act." In OAG, 1977-1978, No. 5,304, p. 427 (April 27, 1978), the AG opined that a county board of commissioners could not establish a county police or security force because "the delegation of law enforcement responsibilities to any entity other than the sheriff would contravene general state laws [and] would tend to increase the powers, duties and jurisdiction of the county board of commissioners by transferring a measure of the sheriff's authority to an organization responsible to the board and not to the sheriff." Finally, in OAG, 1971-1972, No. 4,741, p. 82 (April 13, 1972), the AG opined that a county was without authority to adopt an ordinance banning the discharge of firearms in the county because there was "no express or implied power in the county which would support the adoption of [such] an ordinance."

B. PART 115 ESTABLISHES THE SPECIFIC CONTENTS OF A SOLID WASTE MANAGEMENT PLAN AND COUNTIES CANNOT INCLUDE EXTRANEOUS PROVISIONS THAT WOULD EXPAND THEIR LIMITED DELEGATION OF AUTHORITY.

The contents of a solid waste management plan are limited to the provisions that are authorized in Part 115 and the Part 115 Rules, which are summarized below. A solid waste management plan must "encompass all municipalities within the county" and "take into consideration solid waste management plans in contiguous counties and existing local approved solid waste management plans as they relate to the county's needs." M.C.L. § 324.11533(2). A solid waste management plan must contain an evaluation of the "best available information" regarding recyclable materials within the planning area, including an evaluation of how the planning entity is meeting the state's waste reduction and recycling goals, and, based on that analysis, either provide for recycling and composting of such materials or establish that recycling and composting are not necessary or feasible or is only necessary or feasible to a limited extent. M.C.L. § 324.11539(1)(a), (b) and (d). If the solid waste management plan proposes a recycling or composting program, the plan must contain details of the major features of that program, including ordinances or other measures that will ensure collection of the material; however, as discussed below, Part 115 does not operate as enabling legislation for such ordinances. M.C.L. § 324.11539(1)(c). A solid waste management plan must "identify specific sites for solid waste disposal areas for a 5-year period after approval of a plan or plan update," and either identify specific sites for disposal areas for the remaining portion of the ten-year planning period, or include a process to annually certify the remaining solid waste disposal capacity available to the plan area and an interim siting mechanism[1] that becomes operative when the annual certification

[1]"An interim siting mechanism shall include both a process and a set of minimum siting criteria, both of which are not subject to interpretation or discretionary acts by the planning entity,

indicates that the available capacity is less than 66 months. M.C.L. § 324.11538(2). The solid waste management plan must "explicitly authorize" another county, state, or country to export solid waste into the county. M.C.L. § 324.11538(6).[2] In addition, "[w]ith regard to intercounty service within Michigan, the service must also be explicitly authorized in the exporting county's solid waste management plan." *Id.*

In addition to the plan content requirements expressly contained in Part 115, Section 11538(1) authorizes MDEQ to promulgate rules "for the development, form, and submission of initial solid waste management plans." M.C.L. § 324.11538(1). Part 115 directs MDEQ to provide for the following in its administrative rules regarding solid waste management plans:

> (a) The establishment of goals and objectives for prevention of adverse effects on the public health and on the environment resulting from improper solid waste collection, processing, or disposal including protection of surface and groundwater quality, air quality, and the land.
>
> (b) An evaluation of waste problems by type and volume, including residential and commercial solid waste, hazardous waste, industrial sludges, pretreatment residues, municipal sewage sludge, air pollution control residue, and other wastes from industrial or municipal sources.
>
> (c) An evaluation and selection of technically and economically feasible solid waste management options, which may include sanitary landfill, resource recovery systems, resource conservation, or a combination of options.
>
> (d) An inventory and description of all existing facilities where solid waste is being treated, processed, or disposed of, including a summary of the deficiencies, if any, of the facilities in meeting current solid waste management needs.
>
> (e) The encouragement and documentation as part of the plan, of all opportunities for participation and involvement of the public, all affected agencies and parties, and the private sector.

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and which if met by an applicant submitting a disposal area proposal, will guarantee a finding of consistency with the plan." M.C.L. § 324.11538(3).

[2]*See also*, M.C.L. § 324.11513; Mich. Admin. Code r. 299.4711(e)(iii)(C). In *Fort Gratiot Sanitary Landfill, Inc. v. Department of Natural Resources*, 504 U.S. 353 (1992), the United States Supreme Court invalidated Part 115's flow control provisions to the extent they regulated the interstate flow of solid waste because such regulation violated the Commerce Clause of the United States Constitution.

(f) That the plan contain enforceable mechanisms for implementing the plan, including identification of the municipalities within the county responsible for the enforcement. This subdivision does not preclude the private sector's participation in providing solid waste management services consistent with the county plan.

(g) Current and projected population densities of each county and identification of population centers and centers of solid waste generation, including industrial wastes.

(h) That the plan area has, and will have during the plan period, access to a sufficient amount of available and suitable land, accessible to transportation media, to accommodate the development and operation of solid waste disposal areas, or resource recovery facilities provided for in the plan.

(i) That the solid waste disposal areas or resource recovery facilities provided for in the plan are capable of being developed and operated in compliance with state law and rules of the department pertaining to protection of the public health and the environment, considering the available land in the plan area, and the technical feasibility of, and economic costs associated with, the facilities.

(j) A timetable or schedule for implementing the county solid waste management plan.

M.C.L. § 324.11538(1)(a)-(j). MDEQ has promulgated such rules in Part 7 of the Part 115 Rules. Mich. Admin. Code r. 299.4701 *et seq.*

Rule 711 of the Part 115 Rules sets forth the general structure and the required contents of a county solid waste management plan. "To comply with the requirements of [Part 115,] . . . county solid waste management plans shall be in compliance with the following general format": (i) executive summary;[3] (ii) introduction;[4] (iii) data base;[5] (iv) solid waste management system

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[3]The executive summary must include an overview of the plan, the conclusions reached in the plan and the selected solid waste disposal alternatives. Mich. Admin. Code r. 299.4711(a).

[4]The introduction must establish the plan's goals and objectives for protecting the public health and the environment by properly collecting, transporting, processing, or disposing of solid waste, and by reducing the volume of the solid waste stream through resource recovery, including source reduction and source separation. Mich. Admin. Code r. 299.4711(b).

[5]The data base must include: (i) an inventory and description of the existing facilities serving the county's solid waste disposal needs; (ii) an evaluation of existing problems related to solid waste collection, management, processing, treatment, transportation, and disposal, by type and volume of solid waste; (iii) the current and projected population densities, centers of population, and centers of waste generation for five- and twenty-year periods; and (iv) the current and projected land

alternatives; (v) plan selection; (vi) management component; and (vii) documentation of public participation in the preparation of the plan.[6] Mich. Admin. Code r. 299.4711(a)-(d). Under this general format, the operative portions of a solid waste management plan are contained in the solid waste management system alternatives, plan selection, and management component elements of the plan. The required contents of these three elements are discussed below.

First, each solid waste management system alternative developed in the plan must address the existing problems identified in the plan's data base related to solid waste collection, management, processing, treatment, transportation, and disposal and must address the following components: (i) resource conservation and recovery, including source reduction, source separation, energy savings, and markets for reusable materials; (ii) solid waste volume reduction; (iii) solid waste collection and transportation; (iv) sanitary landfills; (v) ultimate uses for disposal areas following final closure; and (vi) institutional arrangements, such as agreements or other organizational arrangements or structures, that will provide for the necessary solid waste collection, transportation, processing and disposal systems. Mich. Admin. Code r. 299.4711(d)(i)(A)-(H). In addition, the plan must evaluate public health, economic,[7] environmental, siting, and energy impacts associated with each alternative. Mich. Admin. Code r. 299.4711(d)(ii).

Second, the plan must select the preferred solid waste management system alternative developed and evaluated in the plan. The selection must be based on "[a]n evaluation and ranking of proposed alternative systems" using factors that include: (i) technical and economic feasibility; (ii) access to necessary land and transportation networks; (iii) effects on energy usage, including the impacts of energy shortages; (iv) environmental impacts; and (v) public acceptability. Mich. Admin. Code r. 299.4711(e)(i)(A)-(G). The basis for the selection must be set forth in the plan, including a summary of the evaluation and ranking system. Mich. Admin. Code r. 299.4711(e)(ii)(A). The plan must state the advantages and disadvantages of the selected alternative based on the following factors: (i) public health; (ii) economics; (iii) environmental effects; (iv) energy use; and (v) disposal area siting problems. Mich. Admin. Code r. 299.4711(e)(ii)(B)(1)-(5). The selected alternative must "be capable of being developed and operated in compliance with state laws and rules of the Department pertaining to the protection of the public health and environment," include a timetable for implementing the plan, and be "consistent with and utilize population, waste generation, and other [available] planning information." Mich. Admin. Code r. 299.4711(e)(ii)(C)-(E). With respect to disposal areas, the selected alternative must "identify specific sites for solid waste disposal areas" for a five-year

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development patterns and environmental conditions as related to solid waste management systems for five and twenty-year periods. Mich. Admin. Code r. 299.4711(c)(i)-(iv).

[6]The public participation in the preparation of the solid waste management plan must be documented by including in an appendix to the plan a record of attendance at the public hearing and the planning agency's responses to citizens' concerns and questions. Mich. Admin. Code r. 299.4711(g).

[7]The evaluation of the economic impacts must include an estimate of the capital, operational, and maintenance costs for each alternative system. Mich. Admin. Code r. 299.4711(d)(ii).

period following MDEQ approval of the plan and, "[i]f specific sites cannot be identified for the remainder of the 20-year period, the selected alternative shall include specific criteria that guarantee the siting of necessary solid waste disposal areas for the 20-year period subsequent to plan approval." Mich. Admin. Code r. 299.4711(e)(iii)(A), (B). As of June 9, 1994, however, "a county that has a solid waste management plan that provides for siting of disposal areas to fulfill a 20-year capacity need through use of a siting mechanism, is only required to use its siting mechanisms to site capacity to meet a 10-year capacity need." M.C.L. § 324.11537a.

Third, the "management component" element of a solid waste management plan must "identif[y] management responsibilities and institutional arrangements necessary for the implementation of technical alternatives." Mich. Admin. Code r. 299.4711(f). The management component must contain the following: (i) "[a]n identification of the existing structure of persons, municipalities, counties, and state and federal agencies responsible for solid waste management, including planning, implementation, and enforcement"; (ii) an assessment of such persons' and governmental entities' technical, administrative, financial and legal capabilities to fulfill their responsibilities under the plan; (iii) "[a]n identification of gaps and problem areas in the existing management system which must be addressed to permit implementation of the plan"; and (iv) a "recommended management system for plan implementation."[8] Mich. Admin. Code r. 299.4711(f)(i)-(iii).

Solid waste management plans that contain provisions that have not been clearly authorized under the specific sections of Part 115 and the Part 115 Rules discussed above are unlawful. A plan containing such unlawful provisions cannot be approved by MDEQ.

II. MWIA'S COMMENTS ON COUNTY PLAN PROVISIONS

With the foregoing limitations on the specific contents of a solid waste management plan in mind, MWIA contends that the following provisions that are either contained expressly in a solid waste management plan, or that are contained elsewhere (*e.g.* ordinances, regulations or resolutions) but are incorporated by reference into a solid waste management plan, clearly exceed a county's authority under Part 115:

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[8]The recommended management system must: (i) identify specific persons and governmental entities that are responsible for implementing and enforcing the plan, including the legal, technical, and financial capability of such persons and entities to fulfill their responsibilities; (ii) contain a process for "ensuring the ongoing involvement of and consultation with the regional solid waste management planning agency," and for "ensuring coordination with other related plans and programs within the planning area, including, but not limited to, land use plans, water quality plans, and air quality plans"; (iii) identify "necessary training and educational programs, including public education"; (iv) contain a "strategy for plan implementation, including the acceptance of responsibilities from all entities assigned a role within the management system"; and (v) identify "funding sources for entities assigned responsibilities under the plan." Mich. Admin. Code r. 299.4711(f)(iii)(A)-(F).

DISPOSAL FEES

Nothing in the Part 115 or Part 115 Rule provisions discussed above authorizes a county to *require* the payment or collection of fees as part of a solid waste management plan. At most, Rule 711(f)(iii)(F) authorizes the "management component" of a plan to "*recommend*" a "financial program that identifies funding sources." Mich. Admin. Code r. 299.4711(f)(iii)(F). The underlying authority for such a funding program, however, cannot arise from the plan itself and must be found in some other enabling legislation.

Although the Michigan Court of Appeals has recently held that that Section 11520(1) of Part 115 authorized Saginaw County to adopt an *ordinance* that imposes a surcharge on the disposal of solid waste within the county, the court did not hold that such an ordinance may be included in a solid waste management plan or that a solid waste management plan may operate as the underlying authority for such a fee. *County of Saginaw v. Peoples Garbage Disposal, Inc.*, 232 Mich. App. 202 (1998). Indeed, the ordinance at issue in *County of Saginaw* was merely mentioned in the plan as a possible source of revenue and was adopted *after* MDEQ had approved the Saginaw County Solid Waste Management Plan. This distinction is significant because a disposal area that operates "contrary" to an approved solid waste management plan may be subject to an enforcement action under Part 115, which may include a cease and desist order. M.C.L. § 324,11519(2). Clearly, nothing in Part 115 indicates that a disposal area could be ordered to cease operations merely because it failed to pay a fee imposed by a local ordinance.

Moreover, the holding in *County of Saginaw* is inapplicable to counties that do not have certified health departments under Part 115. Section 11520(1) of Part 115, which the court relied upon for its holding, provides:

> Fees collected by a *health officer* under this part shall be deposited with the city or county treasurer, who shall keep the deposits in a special fund designated for use in implementing this part. If there is an ordinance or charter provision that prohibits a health officer from maintaining a special fund, the fees shall be deposited and used in accordance with the ordinance or charter provision. Fees collected by the department under this part shall be credited to the general fund of the state.

M.C.L. § 324.11520(1) (emphasis added). A *health officer* is expressly defined as in Part 115 as "a full-time administrative officer of a *certified* city, county or district department of health." M.C.L. § 324.11504(1) (emphasis added). A certified department of health must be "specifically delegated authority by [MDEQ] to perform designated activities prescribed by [Part 115]." M.C.L. § 324.11502(5). Part 2 (Certification of Local Health Departments) of the Part 115 Rules sets forth the specific requirements that a county health department must meet in order to become certified. Mich. Admin. Code r. 299.4201 *et seq.* Part 115 contains absolutely no authority for the collection of fees by a county that does not have a certified health department.

Further, even if Part 115 did authorize the inclusion of a fee provision in the solid waste management plan of a county with a certified health department (which it does not), MDEQ is prohibited from approving such a plan if the fee is really a disguised tax that violates the Headlee Amendment to the Michigan Constitution, which prohibits local units of government from imposing new taxes without voter approval. Mich. Const. art. 9, § 31; *See Bolt v. City of*

Lansing, 459 Mich. 152 (1998) (storm water fee invalidated under Headlee Amendment as disguised tax). MDEQ's act of approving a solid waste management plan is not merely a rubber stamp of a county's independent act. Rather, MDEQ's approval is the final step in establishing a statewide "cohesive scheme of uniform controls" over the disposal of solid waste. *Southeastern Oakland Co. Incinerator Auth. v. Avon Twp.*, 144 Mich. 39, 44 (1986). By approving a solid waste management plan, MDEQ incorporates that plan into the State solid waste management plan, M.C.L. § 324.11544(1), and, thereafter, a person may not "establish a disposal area" or "conduct, manage, maintain, or operate" a disposal area "contrary" to that approved plan. M.C.L. §§ 324.11509(1), .11512(2). Accordingly, MDEQ could not approve a solid waste management plan that imposes a fee on the disposal of solid waste *unless* MDEQ can demonstrate that the amount of any fee imposed will be reasonable related to the services provided to the persons paying the fee, and that the fee will not otherwise constitute a tax that requires voter approval.

MWIA also believes that, because the decision in *County of Saginaw* has been appealed to the Michigan Supreme Court, MDEQ should use its discretion and refrain from approving county solid waste management plans that contain fee provisions until this issue has been fully resolved. In this regard, MWIA notes that the appeals court's analysis of Section 11520(1) is clearly erroneous because it failed to consider the history and development of Part 115. Section 11520(1) was originally enacted as Section 18 of 1978 PA 641. M.C.L. § 299.418 (repealed, now Section 11520(1) of Part 115). In 1978, the only fees expressly contemplated in Act 641 were nominal disposal area operating license and construction permit application fees, which ranged between $100 and $700. Further, the language of Section 18 of Act 641 was nearly identical to Section 3(3) of the Garbage and Rubbish Disposal Act of 1965, which imposed similar nominal application fees and imposed very few obligations on counties with respect to the solid waste disposal. M.C.L. § 325.293(3) (repealed by Act 641). The Legislature's intent with respect to Section 11520(1) was to allow certified county health departments to retain and use these application fees solely for the purpose of processing the applications. The Legislature clearly did not intend for Section 11520(1) to operate as enabling legislation for counties to impose fees on the disposal of solid waste in order to fund an extensive county solid waste or recycling program.[9] Accordingly, the appeals court's interpretation of Part 115 will likely be overturned.

OPERATING CRITERIA

A solid waste management plan may not contain disposal area operating criteria. Nothing in Part 115 or the Part 115 Rule provisions discussed above authorizes a solid waste management plan to regulate the day-to-day operations of a disposal area. To the contrary, Part 115 provides MDEQ with exclusive authority to regulate disposal area operation. Further, Michigan Appellate Court decisions have unanimously interpreted Part 115 as preempting all local regulation of disposal area operation. *County of Saginaw v. Peoples Garbage Disposal, Inc.*, 232 Mich. App. 202 (1998); *Southeastern Oakland County Incineration Authority v. Avon Township*, 144 Mich. App. 39 (1985); *Weber v. Orion Twp. Bldg. Inspector*, 149 Mich. App. 660

[9] It is also noteworthy that, for the last three years, bills that would authorize county-imposed fees have been proposed in the Michigan Legislature.

(1986) ("all local regulations concerning the operation of a landfill are preempted"); *Dafter Township v. Reid*, 159 Mich. App. 149 (1987). Thus, disposal area operating criteria are not appropriate for a solid waste management plan.

MANDATED RECYCLING

A solid waste management plan may not mandate a quota on the volume of solid waste that is recycled within the planning area. Nothing in Part 115 or the Part 115 Rule provisions discussed above authorizes a county or any another planning agency to mandate such a quota system. Rather, Part 115 only authorizes a county to "*propose* a recycling or composting program" in a county plan. M.C.L. § 324.11539(1)(b). Such a program may only set recycling *goals*, rather than require absolute volume reductions. M.C.L. § 324.11539(1)(d). Further, a program that prohibits a disposal area from accepting a particular type of solid waste, such as waste that could be recycled, would directly conflict with Section 11516(5) of Part 115, which states that "[i]ssuance of an operating license by [MDEQ] *authorizes the licensee to accept waste for disposal*." M.C.L. §§ 324.11533(1), .11516(5) (emphasis added). Thus, any recycling program may, at most, be referenced as a goal.

MANDATED DATA COLLECTION

A solid waste management plan may not require the owner or operator of a disposal area to collect and report data concerning the volume of solid waste that is recycled or disposed of. Nothing in Part 115 or the Part 115 Rule provisions discussed above authorizes a county to impose such an on-going duty on disposal area owners and operators. Rather, Part 115 only requires that, at the time a plan is prepared, a county evaluate "how the planning entity is meeting the state's waste reduction goals." M.C.L. § 324.11539(1)(d).[10] Further, Part 115 expressly delegates the authority to impose such data-collection duties solely to MDEQ and not to the counties. M.C.L. § 324.11507a. Thus, data collection requirements imposed in a solid waste management plan exceed the authority delegated under Part 115.

PRESERVATION OF MORE THAN 10 YEARS OF CAPACITY

A solid waste management plan should provide for the free flow of solid waste to the extent the plan otherwise demonstrates 10 years of disposal capacity. A county has no duty or obligation under Part 115 to demonstrate more than 10 years of disposal capacity. M.C.L. § 324.11538(2). Therefore, a county has no legitimate interest in preserving additional disposal capacity by restricting or prohibiting the importation of out-of-county waste. While the preservation of disposal capacity beyond the legitimate needs of a county may ultimately benefit county residents, the cost of providing that benefit is imposed solely on the disposal area owners and operators doing business within the county. Such a restriction on the use of a disposal area's air space constitutes a taking without compensation that violates the federal and Michigan constitutions.

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[10] A bill that would authorize such mandated data collection regarding recycled material was proposed in the Michigan Legislature last year.

VOLUME RESTRICTIONS

A solid waste management plan cannot restrict the volume of solid waste that may be accepted for disposal at a disposal area during any given time period. Such a restriction is not authorized by that Part 115 Part 115 Rule provisions discussed above and directly conflicts with Section 11516(5) of Part 115, which states that "[i]ssuance of an operating license by [MDEQ] *authorizes the licensee to accept waste for disposal*," without limitation. M.C.L. §§ 324.11533(1), .11516(5) (emphasis added). Such a volume cap would also constitute local regulation of disposal area operating criteria, which, as discussed above, is preempted by Part 115. *Southeastern Oakland County Incineration Authority v. Avon Township*, 144 Mich. App. 39 (1985); *Weber v. Orion Twp. Bldg. Inspector*, 149 Mich. App. 660 (1986) ("all local regulations concerning the operation of a landfill are preempted"); *Dafter Township v. Reid*, 159 Mich. App. 149 (1987). Moreover, such a restriction is an unconstitutional taking of property because it temporarily prevents the use of air space at the disposal area without compensating the owner or operator.

IDENTIFICATION OF SPECIFIC DISPOSAL AREAS

While a solid waste management plan may identify specific disposal areas that are available and willing to accept a county's waste in order to demonstrate that a county has 10 years of disposal capacity and that the plan does not require an interim siting mechanism under Section 11538(2) of Part 115, nothing in Part 115 authorizes a county to restrict the disposal of its solid waste to those specifically identified facilities. Rather, Sections 11513 and 11538(6) of Part 115 require that a plan authorize the "acceptance" of out-of-county waste and the disposal "service" provided either by or for another Michigan county; however, these sections do not require that such acceptance or service be limited to specifically identified disposal areas. M.C.L. §§ 324.11513, .11538(6). At most, a solid waste management plan may limit the disposal of a county's solid waste to specific *counties* that are explicitly authorized in the plan to accept the waste and to serve the county's disposal needs. Furthermore, to the extent that Rule 711(e)(iii)(C) of the Part 115 Rules can be interpreted as requiring the identification of specific disposal areas in solid waste management plans, MWIA contends that such a requirement exceeds MDEQ's authority under Part 115 and is unenforceable.

RESTRICTIONS ON SPECIAL WASTE

A solid waste management plan may not restrict the importation of specific types of solid waste. With the possible exception of municipal solid waste incinerator ash, nothing in Part 115 authorizes a solid waste management plan to distinguish between different types of solid waste. *See* M.C.L. §§ 324.11513, 11538(6). Therefore, to the extent a solid waste management plan authorizes solid waste to be imported from or exported to other counties, such authorization must extend to all forms of solid waste, as that term is defined in Part 115.

ENFORCEMENT BY UNCERTIFIED HEALTH DEPARTMENT

Part 115 and the Part 115 Rules only grant enforcement powers to county health departments that have been certified by MDEQ. For example, Part 115 expressly provides that a health officer of a certified health department may inspect a licensed disposal area at any reasonable time and may issue a cease and desist order, establish a schedule of closure or remedial action, or enter into a consent agreement with an owner or operator of a disposal area that violates the provisions of Part 115 or the Part 115 Rules. M.C.L. § 324.11516(3); Mich. Admin. Code r. 299.4203. In addition, a health officer of a certified health department may inspect a solid waste transporting unit that is being used to transport solid waste along a public road or is being used for the overnight storage of solid waste and may order the unit out of service if it does not comply with the requirements of Part 115 or the Part 115 Rules. M.C.L. §§ 324.11525, .11528(3); Mich. Admin. Code r. 299.4205. None of these enforcement and inspection powers, however, has been delegated to a county that does *not* have a certified health department. Therefore, to the extent a county does not have a certified health department, any enforcement and inspection provisions contained in a solid waste management plan are unlawful.

It should also be noted that several counties without certified health departments are attempting incorporating ordinances into their solid waste management plans under the guise of "enforceable mechanisms," which regulate matters that have been delegated solely to a counties that have certified health departments. For example, at least one such ordinance includes a provision that would authorize a county without a certified health department to issue a "stop order" that prohibits the operation of a disposal area in violation of any provision of the ordinance. As discussed above, this authority has been delegated solely to counties with certified health departments. M.C.L. § 324.11516(3). Further, such a "stop order" would operate as a suspension of a license issued under Part 115 without any of the procedural protections provided under the Michigan Administrative Procedures Act. M.C.L. § 24.101 *et seq.*

It should also be noted that, although a solid waste management plan must include a "program and process" to assure that solid waste is properly collected and disposed of, Part 115's planning provisions are not enabling legislation for county ordinances. M.C.L. § 324.11533(1). The "program and process" included in a solid waste management plan is only "enforceable" to the extent the plan incorporates "enforceable mechanisms" that are specifically authorized under enabling statutes other than Part 115. M.C.L. § 324.11538(1)(f). Although the Legislature contemplated that "enforceable mechanisms" may include ordinances,[11] Part 115 expressly states that it does not "validate or invalidate an ordinance adopted by a county" for purposes of assuring solid waste collection and disposal. M.C.L. § 324.11531(2). Thus, it is clear that the Legislature intended that Part 115 would not operate as enabling legislation for the adoption of such enforceable mechanisms. Such authority, if any, must be specifically delegated to counties in some other enabling legislation. Accordingly, to the extent a solid waste management plan incorporates a county ordinance that provides enforcement powers to a county, MDEQ may not approve such a

[11]Part 115 defines the term "enforceable mechanism" as "a legal method whereby the state, a county, a municipality, or a person is authorized to take legal action to guarantee compliance with an approved county solid waste management plan. Enforceable mechanisms include contracts, intergovernmental agreements, laws, ordinances, rules and regulations." M.C.L. § 324.11503(5).

plan until MDEQ has reviewed each provision of that ordinance and determined that it has been authorized by some enabling legislation and does not exceed a county's delegated authority under that legislation.

TRANSPORTER LICENSING

A solid waste management plan may not impose a licensing requirement on solid waste transporting units. Nothing in the Part 115 or Part 115 Rule provisions discussed above authorizes a county to implement such a licensing program. Rather, Part 115 imposes certain minimum requirements on solid waste transporting units. *See* M.C.L. § 324.11528(1); Mich. Admin. Code r. 299.4601(1). While MDEQ, a health officer of a certified health department, or a law enforcement officer may order a solid waste transporting unit out of service if it does not comply with these minimum requirements, Part 115 is expressly "intended to encourage the continuation of the private sector in the solid waste . . . transportation business *when in compliance with the minimum requirements of this part.*" M.C.L. §§ 324.11528(3), .11548(2) (emphasis added). Moreover, as discussed in the previous section, Part 115's planning provisions do not operate as enabling legislation for counties to adopt ordinances regulating the transportation of solid waste. It should be noted that the Legislature repealed Part 115's licensing requirement for solid waste transporting units in 1979. *See* 1979 Public Act 10. Therefore, licensing requirements applicable to solid waste transporting units exceed a county's authority and a solid waste management plan containing such requirements (or incorporating an ordinance containing such requirements) may not be approved by MDEQ.

SERVERABILITY CLAUSE

The provisions of a solid waste management plan are not severable. Part 115 does not authorize such piecemeal revisions to a solid waste management plan without following the specific plan amendment procedures set forth in Part 115 and the Part 115 Rules. *Michigan Waste Systems, Inc. v. Department of Natural Resources*, 157 Mich. App. 746 (1987). Rather, an amendment to a solid waste management plan to remove an unlawful provision must proceed through a specific five-step approval process. M.C.L. § 324.11535; Mich. Admin. Code r. 299.4708, .4709. To the extent any portion of a plan is declared unlawful or invalid and the county does not properly amend its plan to remove the offending provision, MDEQ must withdraw its approval of the entire plan and establish a schedule for the county to amend the plan in order to comply with Part 115. M.C.L. § 324.11537(2). Therefore, counties and MDEQ should make every effort at this time to ensure that each plan fully complies with Part 115.

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Hillsdale County Solid Waste Management Plan Update
RESPONSE TO COMMENT LETTER
Honigman, Miller, Schwartz, and Cohn letter dated September 2, 1999

A comment letter has been received from the law firm of Honigman, Miller, Schwartz, and Cohn concerning the Hillsdale County Solid Waste Management Plan update. The letter was received within the 90-day comment period offered for the plan update. The following represents the disposition of comments raised in the letter.

I.A. Permissible contents of county solid waste management plans, Section A, Counties only possess delegated powers and cannot regulate for the health and safety of their residents.

RESPONSE:

The Hillsdale County Board of Commissioners, and the Hillsdale County Solid Waste Management Planning Committee, concede that counties have no inherent authority to include provisions in solid waste management plans without clear authorization by Michigan Legislature under Part 115. The Hillsdale County Solid Waste Management Planning Committee prepared the Solid Waste Management Plan Update per the guidelines contained under Part 115 of the Natural Resources and Environmental Protection Act.

I.B. Permissible contents of county solid waste management plans, Section B, Part 115 establishes the specific contents of a solid waste management plan and counties cannot include extraneous provisions that would expand their limited delegation of authority.

RESPONSE:

The Hillsdale County Solid Waste Management Planning Committee prepared the Solid Waste Management Plan update in accordance with Part 115 rules. The Committee does not believe it included any extraneous provisions that would expand the limited delegation of authority offered the County.

II.A. MWIA comments on County Plan Provisions--Disposal Fees.

RESPONSE:

The Hillsdale County Solid Waste Management Plan update does not require the payment or collection of fees as a part of the Solid Waste Management Plan.

II.B. MWIA comments on County Plan Provisions--Operating Criteria.

RESPONSE:

The Hillsdale County Solid Waste Management Plan update does not contain disposal area operating criteria.

II.C. MWIA comments on County Plan Provisions--Mandated Recycling.

RESPONSE:

The Hillsdale County Solid Waste Management Plan update does not mandate a quota on the volume of solid waste that is recycled within the planning area.

II.D. MWIA comments on County Plan Provisions--Mandated Data Collection.

RESPONSE:

The Hillsdale County Solid Waste Management Plan update does not require the owner or operator of a disposal area to collect and report data concerning the volume of solid waste that is recycled or disposed of.

II.E. MWIA comments on County Plan Provisions--Preservation of more than 10 years of capacity.

RESPONSE:

The Hillsdale County Solid Waste Management Plan update provides documentation that 10 years of disposal capacity exists for Hillsdale County solid waste. The update makes no claim to capacity beyond the 10-year period covered in the plan.

II.F. MWIA comments on County Plan Provisions--Volume Restrictions.

RESPONSE:

Hillsdale County Solid Waste Management Plan update does not restrict the volume of solid waste that may be accepted for disposal at a disposal area during any given time period.

II.G MWIA comments on County Plan Provisions--Identification of specific disposal areas.

RESPONSE:

The Hillsdale County Solid Waste Management Plan update does not restrict the disposal of Hillsdale County Waste to facilities specifically identified within the Plan. Several counties are explicitly authorized in the Plan to accept the waste and to serve the County's disposal needs.

II.H MWIA comments on County Plan Provisions--Restrictions on special waste.

RESPONSE:

The Hillsdale County Solid Waste Management Plan update does not restrict the importation of specific types of solid waste.

II.I. MWIA comments on County Plan Provisions--Enforcement by uncertified health department.

RESPONSE:

The Hillsdale County Solid Waste Management Plan update contains no enforcement or inspection provisions, nor are any county ordinances incorporated into the Plan.

II.J. MWIA comments on County Plan Provisions--Transporter licensing.

RESPONSE:

The Hillsdale County Solid Waste Management Plan update does not impose any licensing requirement on solid waste transporting units.

II.K. MWIA comments on County Plan Provisions--Severability clause.

RESPONSE:

The Hillsdale County Solid Waste Management Planning Committee, and the Hillsdale County Board of Commissioners concede that revisions to a solid waste management plan must follow the plan amendment procedures established in Part 115 and Part 115 Rules.

STATE OF MICHIGAN

JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

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RUSSELL J. HARDING, Director

REPLY TO:

WASTE MANAGEMENT DIVISION

PO BOX 30241

LANSING MI 48909-7741

RECEIVED

OCT 25 1999

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October 21, 1999

Mr. Kenneth Lautzenheiser, Chairman
Hillsdale County Board of Commissioners
2nd Floor, Courthouse
Hillsdale, Michigan 49242

Dear Mr. Lautzenheiser:

On July 30, 1999, the Department of Environmental Quality (DEQ) received a copy of the draft Hillsdale County (County) Solid Waste Management Plan Update (Plan) that was released for the 90-day public comment period on July 13, 1999. Our review of the Plan has now been completed. I will address our comments in the same order as the topics appear in the Plan. In my opinion, the following areas of the County's Plan may be of cause for concern and may require revision or additional information:

Cover Page — Please be sure to indicate the date when the final Plan is submitted to the Department of Environmental Quality (DEQ) for approval. If different versions of the Plan are prepared during the update process, listing the date can ensure that discussions between the DEQ and the County are referring to the correct document.

Page I-5 — The planning period is 10 years, not 20, although the County may plan for 20 years if it desires. This also applies to the discussion of long-range policies on Page I-7.

Objective 1e refers to Act 641. References to Act 641 should be changed to Part 115, Solid Waste Management (Part 115), of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), as Act 641 was repealed and recodified into the NREPA.

Page I-6 — The reference in item number eight to Act 641 should be to Part 115.

Page II-1 — We question the waste generation figure of 2.1 pounds per person per day. As mentioned in the Plan, SWANA estimates 3 pounds per person per day. The EPA estimate for waste generation is 4.4 pounds per person per day. Other Plans that various counties have already submitted for review have indicated generation rates higher than Hillsdale's. That makes this Plan stand out as an anomaly. . If the County continues to assume such a low generation rate, it should be backed up by some reasonable data.

Page II-5 — The City of Hillsdale Transfer Station is a Type A facility.

Page II-7 This facility is a Type B transfer station and should not be shown as licensed. What is the site size, capacity, and yearly volume? These comments apply to Page III-9 also.

Page II-10 This facility is a Type B transfer station and should not be shown as licensed. These comments apply to Page III-12 also.

Page II-11 Please indicate the owner of this facility. It is private or publicly owned? These comments apply to Page III-13 also.

Page II-12 Please indicate the owner of this facility. It is private or publicly owned? These comments apply to Page III-14 also.

Page II-13 No location information is included for this facility. Who owns the facility? Is it public or private? What is the area sited by the Calhoun County Plan for use? These comments apply to Page III-15 also.

Page II-14 Why is the Williams County Landfill listed as a final disposal site for this facility? Liberty Environmentalists Landfill is not a transfer station. Who owns the facility? Is it public or private? The last two questions apply to Page III-16 also.

Page II-15 Why is the Williams County Landfill listed as a final disposal site for this facility? McGill Road Landfill is not a transfer station. It is a Type II landfill. Who owns the facility? Is it public or private? The last two questions apply to Page III-17 also.

Page II-17 No location information is included for this facility. Who owns the facility? Is it public or private? The last two questions apply to Page III-19 also.

Page II-18 Please indicate the owner of this facility. It is private or publicly owned? These comments apply to Page III-20 also.

Page II-19 No location information is included for this facility.

Page II-20 No location information is included for this facility. Why is the Williams County Landfill listed as a final disposal site for this facility? The National Serv-All Landfill is not a transfer station. Who owns the facility? Is it public or private? The last two questions apply to Page III-22 also.

Page III-5 The counties listed on Table 2-B appear to duplicate those on Table 2-A. Table 2-B is generally intended to pre-authorize shipment of waste to counties that do not currently have disposal areas, but that may have disposal areas in the future. Duplicating the information from Table 2-A is not necessary.

Page III-21 No location information is included for this facility. What is the final disposal site for transferred waste?

Page III-27 The techniques described on this page are not volume reduction techniques, but instead are recycling or composting programs. Volume reduction involves the use of a process to reduce the physical size of the waste. Compaction is a commonly used technique, as is incineration. Other methods, such as shredding, could also be used to reduce the waste volume. It is that type of

process that should be listed on this page. Do any transfer stations use compaction of the waste before it is shipped for final disposal? If so, that should be shown on this page. The information that was placed on this table should be included in the discussion of recycling in Appendix A.

Page III-30 As required by Section 11539(1)(a) and (b) of Part 115, the Plan must provide a written discussion of the opportunities available for recycling and composting in the county. Types and volumes of materials available in the waste stream must be identified. Identification of impediments to recycling or composting with recommendations for minimizing the impediments and identification of potential benefits of recycling and composting programs must also be included.

The narrative states that tables on Pages III-18, 19, 20, and on Pages III-21, 22, and 23 show data on recycling, composting, and source separation of hazardous materials, but the reference should be to Pages III-31 through III-36.

Page III-37 The Board of Commissioners is not an environmental group and should not be listed under that heading.

Page III-41 If the Plan will not allow any solid waste disposal areas to be sited, it should be clearly stated that no facilities may be sited under the Authorized Disposal Area Types heading.

Under the siting Criteria and Process heading, the Plan should provide justification for not including a siting process, such as having over ten years of available capacity. If such a statement is made, the Plan must provide a specific demonstration of capacity as indicated in the comments concerning Page IV-1 below, that there is sufficient capacity.

Page III-45 Box number two is checked, but no local ordinances are listed. Any local ordinance included in this section must be specifically identified and the language of the ordinance included. A description of how the ordinance applies to the Plan must also be included.

What is intended by the statement encouraging transfer stations? The Plan does not contain a process to site them. Additionally, the statement does not seem related to local ordinances. If the County wishes to allow establishment of transfer stations and processing plants without a siting process, it must specifically identify them or clearly allow them under the Siting Criteria heading at any location in the County.

The statement regarding local zoning and land use plans is too broad to evaluate and is not approvable as written. It must specifically identify what aspects of each subject may be affected by local regulation. By what authority does the County require closure of facilities on certain days?

Why is the last paragraph on the page included when there is no siting mechanism in the Plan.

Page IV-1 The Plan states that more than ten years of capacity has been identified, however, I could not find any calculation or specific demonstration of disposal capacity in the Plan to confirm that over ten years of capacity exists. Although

the Plan includes several landfills with over ten years of capacity, the calculation of available landfill capacity should be shown in relation to the County's disposal needs. Additionally, there is no documentation from any landfills in Appendix D that the County has access to their capacity.

Page A-7 This is supposed to be an evaluation summary of the selected system, not an analysis and ranking of alternative systems. The ranking of alternatives appears to duplicate that already in the Data Base. The analysis of non-selected alternative systems should be placed in Appendix B.

Page C-4 What industry, township government, and environmental interest groups are represented on the SWPC? Only the representatives from city government, the County, and the solid waste industry name the group or company they represent.

D-3 As indicated earlier, there is no documentation from any landfills that the County has access to their capacity. This will need to be included.

I appreciate the efforts that you have shown in the development of the Plan and the degree to which the Plan Format has been utilized. This makes the document much easier to review. I hope that these comments are useful to Hillsdale County as you attempt to develop an approvable Plan. If you have any further questions or comments, please feel free to contact me by telephone, or by e-mail, at johnsoj1@state.mi.us.

Sincerely,

James E. Johnson
Solid Waste Management Unit
Waste Management Division
517-373-4738

cc: Mr. Charles Reisdorf, Region Two Planning Commission
Mr. Seth Phillips, DEQ
Hillsdale County File

PUBLIC PARTICIPATION

PLANNING COMMITTEE APPOINTMENT PROCEDURE:

The Hillsdale County Board of Commissioners filed a notice of intent with the Michigan Department of Environmental Quality to prepare a solid waste management plan update at a regular meeting held on August 26, 1997. To update the plan, it was necessary to re-activate the Hillsdale County Solid Waste Planning Committee.

Members of the 1991 solid waste management planning committee were contacted to determine whether they would be interested in serving on the newly-reactivated planning committee. Those who expressed an interest were reappointed. Vacant positions were filled following a search for prospective Committee members by the Hillsdale County Board of Commissioners.

PUBLIC PARTICIPATION

PLANNING COMMITTEE

Committee member names and the company, group, or governmental entity represented from throughout the county are listed below.

Four representatives of the solid waste management industry:

1. John Bebeau, Tri-State Waste, Inc.
2. Doug Kinnett, Marathon Oil
3. Bill Lee, ACT Laboratories, Inc.
4. Duane Sanborn, Material Management

One representative from an industrial waste generator:

1. Curt Shaneour, The Shane Group, recreation equipment, athletic facility lighting manufacturer

Two representatives from environmental interest groups from organizations that are active within the county:

1. Bev Brown, Don't Waste Michigan
2. Richard Wunsch, Hillsdale Organization for the Preservation of the Environment (HOPE)

One representative from county government. All government representatives shall be elected officials or a designee of an elected official.

1. David Steel, Hillsdale County Commissioner

One representative from township government:

1. Phil Mosher, Trustee, Fayette Township

One representative from city government:

1. Debra Sikorski, City of Hillsdale

One representative from the regional solid waste planning agency:

1. Charles Reisdorf, Region 2 Planning Commission

Three representatives from the general public who reside within the county:

1. Christy Cook
2. Jack McLain
3. Gary Noblet

ATTACHMENTS

APPENDIX D

Plan Implementation Strategy

The following discusses how the county intends to implement the plan and provides documentation of acceptance of responsibilities from all entities that will be performing a role in the plan.

Implementation of solid waste management plans have been conducted by the private sector and local units of government. The technical, financial, administrative, and legal ability of the private sector to accomplish implementation is good.

ATTACHMENTS

Resolutions

The following are resolutions from county board of commissioners approving municipality's request to be included in an adjacent county's plan.

Does not apply.

ATTACHMENTS

Listed Capacity

Documentation from landfills that the county has access to their listed capacity.

Documentation for landfill capacity available to Hillsdale County has been provided by Tri-State Wastes, Inc. in a letter. (See page D - 4). Other letters from companies offering landfill capacity to Hillsdale County also follow.

WILLIAMS
COUNTY
LANDFILL

Mr. Charles Reisdorf
Region 2 Planning Commission
Jackson County Tower Building – 16th Floor
120 West Michigan Avenue
Jackson, Michigan, 49201

RECEIVED
DEC 16 1999
R2PC

December 2, 1999

Dear Mr. Reisdorf:

Please be advised that Williams County Landfill is prepared to accept, and has sufficient landfill capacity, to meet the Solid Waste Disposal needs of Hillsdale County for an additional 10 years.

This information is provided, and considered accurate, at current volume levels, and is not expected to be materially changed.

Please call me if you have any further questions or comments.

Sincerely,

John Bebeau
General Manager

12604 County Road G * Bryan * OH * 43506 * (419)636-2242 * (419)636-5507fax

Barry Co

CITY ENVIRONMENTAL SERVICES - HASTINGS • P.O. BOX 336 • 1869 N. BROADWAY • HASTINGS, MI 49058
~~(616) 945-4493~~ • FAX (616) 945-4582

1-800 441 9712

October 16, 1998

Mr. Richard Wunsch, Chairman
Solid Waste Planning Committee
Hillsdale County
29 N. Howell St.
Hillsdale, Mi. 49242

Re: Hillsdale County Solid Waste Plan

Dear Chairman Wunsch,

I am sending you and your committee a second packet of information for solid waste planning purposes, from Barry County. The first packet was mailed to Hillsdale County in May of this year by the Barry County Solid Waste Planning Committee. Since the initial information was sent to your group, the City Environmental Services Landfill has received a new construction permit. The new construction permit increases the existing landfill by 18 acres. This small increase in the "footprint" significantly increases the volume at the Hastings site to approximately 5 million bank yards.

Reviewing your August 13, 1998 meeting minutes, I see that your committee has chosen to include the Washtanaw County site, (Arbor Hills) for export from Hillsdale County. The Hastings site is closer, as the crow flies, than the Washtanaw County site. We would like Hillsdale County to consider C.E.S. Hastings as a site for primary disposal. Including the C.E.S. Hastings site gives Hillsdale County additional future capacity for documenting 5 year and 10 year capacity certification.

If you have questions regarding this communication please feel free to call.

Sincerely,

Steve Essling

City Environmental Services Landfill, Inc. of Hastings

RECYCLED PAPER

RECEIVED MAY 26 1998

MAY 27 1998

Cy to: Amy Dal

May 22, 1998

Ms. Amy Brown
Hillsdale County Board of Commissioners
County Courthouse
29 North Howell
Hillsdale, MI 49242

RE: Hillsdale County Solid Waste Management Plan Update
Explicitly Authorized Solid Waste Exports

Dear Ms. Brown:

BFI Waste Systems of North America, Inc. is a waste disposal company operating three Type II Sanitary Landfills in Michigan. These disposal facilities are authorized to accept municipal refuse, non-hazardous industrial waste and non-hazardous contaminated soils. These facilities are C&C Landfill in Calhoun County (south central Michigan), Arbor Hills Landfill in Washtenaw County (southeast Michigan) and Vienna Junction Landfill in Monroe County (also southeast Michigan). Included with this letter are the facility descriptions for each of the three BFI sites. You will be required by the MDEQ to provide this information in your planning process.

BFI understands that your county has indicated to the Michigan Department of Environmental Quality (MDEQ) its intention to update your solid waste management plan as required by Part 115 of the Natural Resources and Environmental Protection Act. In order for a landfill located in one county to serve the disposal needs of another county, Part 115 requires that the solid waste management plans of both counties explicitly authorize such services. The MDEQ also recommends, as part of your solid waste management plan update, that the updated plan explicitly identify the quantity of waste which may be exported to another county for disposal. Current export/import authorizations for your county are listed in the MDEQ "Export/Import Authorizations in County Solid Waste Management Plan Updates - January 1996". A copy of this report can be obtained from the MDEQ.

BFI's intent in sending this letter is to ask that your Solid Waste Planning Committee review its current export authorizations. We would then ask that your committee consider providing for export authorization to the three counties identified above (Calhoun, Washtenaw and Monroe) in the event that your county should ever be in need of one of

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Phone 248-349-7230 · Fax 248-349-7572
www.bfi.com

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these disposal facilities in the next five to ten years (as required by the solid waste planning process). BFI would also ask your committee to consider authorizing each of these three landfills to serve up to 100 percent of the daily and annual disposal needs of your county, again, in the event that this should ever be necessary.

BFI would be pleased to help your county to provide for its long term disposal needs. We looks to provide any assistance we may offer to you as you move through this solid waste planning update process. We would also be happy to attend any scheduled meetings at which you might request BFI to be present in order to discuss this request in more detail. I thank you for your attention to this request.

Sincerely,

Kathleen A. Klein
BFI Public Sector Representative

Encl.

LAW OFFICES
JAFFE, RAITT, HEUER & WEISS
PROFESSIONAL CORPORATION
SUITE 2400
ONE WOODWARD AVENUE
DETROIT, MICHIGAN 48226
TELEPHONE (313) 961-8380
TELEFACSIMILE (313) 961-8358

SOUTHFIELD

Arthur H. Siegal

July 16, 1998

RECEIVED
JUL 21 1998
R2PC

Mr. Charles Reisdorph
Region II Planning Commission
Hillsdale County
120 West Michigan
Jackson, MI 49201

Dear Mr. Reisdorph:

This letter is being sent to you on behalf of the Adrian Landfill, Inc. ("ALI"), which was formerly known as Laidlaw Waste Systems (Adrian), Inc. As you may know, Laidlaw underwent a corporate acquisition, which explains the name change of the corporation that owns the landfill. Because this was merely a name change, Adrian Landfill, Inc. is the same corporation as Laidlaw Waste Systems (Adrian), Inc.

ALI would like to assist the Hillsdale County Solid Waste Planning Committee with ensuring that the Hillsdale County Solid Waste Plan update reflects the current legal and practical status of the ALI landfill, located in Lenawee County, thereby assisting Hillsdale County in developing a Plan that will both meet the needs of the County and obtain all of the approvals necessary to be effective.

A. History

In March of 1996, Laidlaw and Lenawee County extended a pre-existing agreement, enhancing some of the benefits granted to both sides. The new agreement remains in effect until August 31, 2006, or until the Landfill's airspace is exhausted, whichever occurs first. The Agreement defines the airspace by reference to the property owned by the Landfill. In paragraph 13 of the Agreement, the County agreed to incorporate the relevant terms of the Agreement into all future amendments or updates of the Lenawee County Solid Waste Plan.

Without trying to modify or repeat all of the terms of the Agreement, of particular import are the following:

- The Landfill is authorized to accept up to an average of 6,600 tons of municipal solid waste per week over each six month period from Ohio, Indiana and Ontario, Canada or from Hillsdale County in addition to a number of other specified Michigan counties which make up the regional wasteshed.

- The Landfill is authorized to accept up to an average of 6,600 tons of "special waste" per week over each six month period from outside of Michigan or from any county in the State of Michigan. Special waste is defined in the agreement as solid waste which is not generally considered residential or commercial waste and which is generally homogenous in nature and generated in bulk, including, but not limited to: contaminated soil, construction and demolition debris, foundry sand, sludges, street sweepings, fly ash, bottom ash, slag, auto fluff and agricultural wastes.

B. Current and Future Disposal Capacity

ALI currently has an estimated 1,540,000 cubic yards of disposal capacity available to it, which, at current rates of receipt would mean an anticipated life of seven years. This includes receipts from outside Lenawee County. Recently, ALI applied for MDEQ approval of a construction permit for an expansion that would allow the acceptance of an additional 3,650,000 cubic yards of waste, which translates into an anticipated additional life of 16 years, for a total of 23 years. While ALI has not projected beyond that point, it does have substantial additional land reserves at the same location.

The current Lenawee County Solid Waste Plan identifies Hillsdale County as an approved source of waste for disposal in Lenawee County. *See* enclosure. The current Hillsdale County Solid Waste Management Plan already identifies the ALI landfill as a potential disposal site (p. 221) and in its plan selection section, the County Plan expresses as a goal the use of a landfill serving a multiple-county region. The ALI landfill does serve, and plans to continue serving, a multiple-county region. No reciprocal agreements are needed.

ALI is working with the Lenawee County Solid Waste Planning Committee and fully expects that its 1996 agreement will be incorporated into the Lenawee County Solid Waste Plan Update.

C. Proposal

Therefore, ALI has and will have disposal capacity available to the residents and businesses of Hillsdale County and requests that its facility in Lenawee County, Michigan be incorporated into the Hillsdale County Solid Waste Plan Update. We believe that it is appropriate to include Lenawee County as an approved location for disposal of Hillsdale County waste of up to 343,2000 tons per year.

We believe that this proposal is consistent with and satisfies the requirements of Michigan Environmental Code Part 115 sections 11533(1), 11538(1)(a), 11538(1)(i), and 11538(2) and Michigan Administrative Code Rules R 299.4711(e)(iii), all of which specify the content of every county's solid waste management plan.

I will be the primary contact and will be responsible for providing any information that the Hillsdale Solid Waste Planning Committee requires. I look forward to working with the Committee to ensure a smooth transition between the old and new Plans and to ensure that Hillsdale County has a safe, secure and environmentally sound waste management program for years to come.

If you have any questions, please feel free to call me. My telephone number is (313) 961-8380. I hope the above assists the Committee with its project.

Sincerely,

JAFFE, RAITT, HEUER & WEISS
Professional Corporation

Arthur H. Siegel

AHS/vlp
Enclosure
cc: Mr. William Cramb, ALI
0568387.01

RECEIVED MAY 0 5 1998

Waste Management[SM]

Grand Rapids Customer Service Center
1668 Porter Street, S.W.
Grand Rapids, Michigan 49509-1796
Phone 616.538.3750

May 1, 1998

RECEIVED
MAY 1 1 1998
R2PC

Ms. Amy Brown
Hillsdale County Board of Commissioners
County Courthouse
29 North Howell
Hillsdale, MI 49242

Re: Waste Management Landfills in Michigan

Dear Solid Waste Planning Committee Members:

Waste Management of Michigan, Inc. owns and operates eight (8) licensed solid waste landfills located throughout the lower peninsula of Michigan. All of these landfills are allowed to receive waste from many counties and a few from all counties in the lower peninsula. Attached please find the following information:

1. MDEQ standard format information sheets for each of our landfills.
2. A map showing the location of our landfills.
3. A listing for each landfill showing which counties may import waste to the site.

The list of counties for each site is based upon existing county plans or our existing host agreements with counties which provide for the county to add these counties during the current plan updates. In most cases there is no requirement to have signed inter-county agreements. However, for those counties that do require inter-county agreements, we have indicated that on the sheet. We are encouraging all counties to have their plans as open as possible with regards to inter-county transfers and to not require signed agreements between the counties. In some cases, we are requesting our host counties to add additional counties, during the update process, which are not covered under a host agreement. These are also indicated on the attached sheets.

As you update your plan, please add as many of our landfills, as you wish, to your plan and notify out host counties of your intentions and request that they also include you in their plans.

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If you have any questions, need additional information, or wish to add your county as an exporting county to one of our landfills, please call me at (616) 538-1921 ext. 151.

Sincerely,

WASTE MANAGEMENT OF MICHIGAN, INC.

Jeff Poole
Manager, Business Development

File: Hillsdale County, 517/437-3932

ATTACHMENTS

Maps

Maps showing locations of solid waste disposal facilities used by the county.

See pages II-21 and II-22.

ATTACHMENTS

Inter-County Agreements

Copies of inter-county agreements with other counties (if any).

No inter-local agreements exist between the County and other Counties.

ATTACHMENTS

Special Conditions

Special conditions affecting import or export of solid waste.

No special conditions apply to the import or export of solid waste other than contained within this Hillsdale County Solid Waste Plan Update.

6-08-2000 11:54AM FROM REGION 2 PLANNING CO 517 788 4635 P 2

Region 2 Planning Commission

Jackson County Tower Building
120 West Michigan Avenue
Jackson, Michigan 49201

Fax: 517-788-4635 **517-788-4426** Email: Region2@dmci.net

June 8, 2000

Mr. Kenneth E. Lautzenheiser, Chair
Hillsdale County Board of Commissioners
29 N. Howell St.
Hillsdale, Mi 49242

Dear Mr. Lautzenheiser:

Transmitted herewith is the Hillsdale County Solid Waste Management Plan Update prepared and approved by the Hillsdale County Solid Waste Planning Committee. By unanimous vote at a meeting of the Committee on Wednesday, May 24, 2000, the committee thei approved the plan and directed that it be sent to the Hillsdale County Board of Commissioners for approval. In preparing the update, the Solid Waste Management Planning Committee followed guidelines provided by the Michigan Department of Environmental Quality. Nine public meetings of the Solid Waste Management Planning Committee were held. A ninety day comment period and two public hearings were conducted to offer citizen input on the plan.

Review and approval by the Hillsdale County Board of Commissioners is requested. Following approval by the Board of Commissioners, the plan will be distributed to Hillsdale County's cities, villages, and townships for their approval. Sixty-seven percent of these local units of government must approve the plan before it can be sent to the director of the Michigan Department of Environmental Quality for final approval.

Sincerely,

Charles C. Reisdorf
Executive Director

HILLSDALE COUNTY SOLID WASTE
MANAGEMENT PLAN UPDATE - A SUMMARY

According to Michigan Law, counties are required to update their County Solid Waste Management Plans every five years. The Hillsdale County Solid Waste Management Plan was recently updated by the Solid Waste Planning Committee, a thirteen member committee comprised of representatives of the solid waste industry, the public, the government, environmental interest groups, and industrial waste generators. The committee met on nine occasions in public meetings beginning on March 5, 1998, and concluding with approval of the plan on May 24, 2000. The approval process included a ninety day comment period and two public hearings. The committee has recommended approval of the plan to the Hillsdale County Board of Commissioners by unanimous vote. The committee followed requirements of the Michigan Department of Environmental Quality and prepared the plan update in accordance with their recommended format.

The plan estimates that Hillsdale County's 2000 estimated population of 46,600 generated approximately three pounds of waste per person per day, or 45,878 tons per year. In addition, another 20,014 tons per year were generated from construction and demolition activities, agriculture, wood industries, and the sweeping of streets. Approximately 62,300 tons per year require disposal. Most of Hillsdale County's waste is disposed at the Williams County Landfill in Bryan, Ohio the remaining waste is disposed at various landfills in counties surrounding Hillsdale County, and through recycling and composting.

The county has six transfer facilities where waste is collected for disposal. They include the city of Hillsdale, Camden Township, Jefferson Township, Reading Township, Ransom Township, and Scipio Township Transfer Stations.

A system of private haulers serves the county through residential trash pick-up, and transport services from transfer facilities.

Recycling is offered at several transfer stations, and at curb side by various haulers. An estimated 357 tons of refuse are estimated to be diverted annually through recycling.

Composting, both municipal programs and on-site household composting exists within the county to reduce the volume of yard wastes entering landfills.

The existing Hillsdale County Solid Waste Management Plan served as the basis for the update. There are no significant changes in policy regarding the disposal of wastes. Most of Hillsdale County's waste will continued to be transported to the Williams County Landfill in Bryan, Ohio. According to the update, waste may also be transported to landfills located in Calhoun, Lenawee, Jackson, Washtenaw, Barry, Branch, and St. Joseph Counties in Michigan; and in Wayne County, Indiana. Solid waste may be imported into Hillsdale County for disposal at transfer facilities from Branch, Calhoun, Jackson, and Lenawee Counties. The Williams County Landfill has provided Hillsdale County with assurance that a minimum of ten years disposal capacity exists at their facility. Therefore, the Update prohibits landfill development

within Hillsdale County. In addition, because of this capacity, no mechanism has been developed to site a landfill facility within the county.

The county will continue to place emphasis on reduction of solid waste, and recycling and composting. Programs available through the state of Michigan and the MSU extension service will be offered to county residence as they become available. All Hillsdale County residents are encouraged to reduce waste, recycle, and compost yard wastes.

The Update proposes as a continuation of the use of transfer stations and accompanying recycling facilities. Local units of government within the county may develop transfer facilities upon their initiative, subject to any regulations regarding these facilities through zoning or other means as they deem necessary and/or advisable.

The Hillsdale County Solid Waste Management Plan Update deviates from the previous Solid Waste Management Plan in the following:

1. The plan estimated generation rates of 2.1 pounds per person per day generated by Hillsdale County residence. The Update relies on a figure of 3.0 pounds per person per day which is based upon estimates provided by the American Solid Waste Association of North America which estimates generation rates to be at this level. No documentation could be provided to support generation rates lower than 3.0 pounds per person per day.

2. The previous plan called for no solid waste landfill to be constructed within the county until 1995, unless warranted by emergency conditions. The plan update permits no solid waste landfill within the next ten year period due to the capacity which exists for Hillsdale County Waste at the Bryan, Ohio facility.

00-57

June 13, 2000

TO THE HONORABLE BOARD OF COMMISSIONERS:

WHEREAS, the Hillsdale County Solid Waste Committee, after nine public meetings commencing March, 1998 and concluding May, 2000, has updated the Hillsdale County 5-year Solid Waste Management Plan, and

WHEREAS, the Solid Waste Committee followed requirements of the Michigan Department of Environmental Quality and prepared the Plan update in accordance with the recommended format, and

WHEREAS, the Hillsdale County Solid Waste Committee, on May 24, 2000, has approved the updated Solid Waste Plan

NOW THEREFORE BE IT RESOLVED that the Hillsdale County Board of Commissioners approves the updated Hillsdale County Solid Waste Management Plan and directs that the plan be distributed to local units of Government in Hillsdale County with a request for their immediate approval

Adoption certified this 13th day of June, 2000.

Thomas E. Mohr — JUNE 13, 2000

Thomas Mohr, Hillsdale County Clerk — Date

Kenneth E. Lautzenheiser, Chairperson

Robert Null, Vice Chairperson — Tom Warzecha

David Steel — Alice Britton

APPROVED BY THE HILLSDALE COUNTY BOARD OF COMMISSIONERS ON JUNE 13, 2000.

The **Solid Waste Management Planning Committee** convened in the Michigan State University Cooperative Extension Conference Room A, 20 Care Drive, Hillsdale, Michigan on May 24, 2000.

Richard Wunsch, Chairperson, called the meeting to order at 6:30 p.m.

Agenda
1. Call to Order
2. Roll Call
3. Approval of Minutes
4. Approval of Agenda
5. Public Comment
6. Recommendation of Approval of Solid Waste Plan to Board of Commissioners
7. Other Business
8. Next Meeting Date
9. Adjournment

Committee Present: Bev Brown, Gary Noblit, Richard Wunsch, Christie Cook, Bill Lee, Jack McLain, David Steel, Deb Sikorski, Curt Shaneour

Others Present: Chuck Reisdorf, Deb Coffing

Christie Cook moved to approve the minutes of May 1999. Support by Gary Noblit. Motion carried.

Christie Cook moved to approve the Agenda. Support by Deb Sikorski. Motion carried.

Public Comment
None

Solid Waste Plan Update Draft Review
Chuck Reisdorf, Region II Planning, reviewed with the Committee the comment letter received from Honigman, Miller, Schwartz, and Kohn Law Firm, dated September 2, 1999. Mr. Reisdorf prepared responses to their comments and reviewed these with the Committee, also.

The letter from the Dept. of Environmental Quality, dated October 21, 1999, to the Board of Commissioners was also reviewed with the Solid Waste Committee. This letter included some areas of concern. Mr. Reisdorf informed the Committee that he corrected everything in the Plan that DEQ requested. All local units responded to his inquiries about capacity of solid waste except Jefferson Township. Mr. Reisdorf reviewed handouts "Estimate of Solid Waste Generation" for Hillsdale County. He advised to use 3 lbs. per person per day in the Plan. Bev Brown made a motion to adopt 3 lbs. per person per day in the Hillsdale County Solid Waste Plan. Support by Dave Steel. Motion carried.

Mr. Reisdorf recommended that a change be made on the Plan, page III-45 from #2 to #1, prohibiting enforcement of all county and local ordinances and regulations pertaining to solid waste disposal areas unless explicitly included in an approved solid waste management plan.

Recommending Approval of Solid Waste Plan to Board of Commissioners
After the Committee agreed to make the above changes, Gary Noblit made a motion to approve the Solid Waste Plan and send to the Board of Commissioners for approval. Bev Brown supported. Motion carried.

Upon approval by the Board of Commissioners, a motion was made by Gary Noblit to send a copy of the Plan, a cover letter of explanation and Resolution to all government municipalities for approval. Support by Bev Brown. Motion carried.

Other Business
Dave Steel, County Commissioner, speaking on behalf of the Board of Commissioners complimented the Committee on their time and effort on the Solid Waste Plan the last 3 years.

Next Meeting Date
None

Adjournment
A motion was made by Curt Shaneour to adjourn at 7:20 p.m. Support by Richard Wunsch. Motion carried

Respectfully submitted,

Deborah Coffing

Deborah Coffing, Secretary

RECEIVED JUL 2 . 2000

Hillsdale County Solid Waste Plan Update
APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The Adams Township, at a meeting held on
(Unit of Government)
July 10, 2000 7:30 pm
Date & Time

WASTE MANAGEMENT DIVISION
NOV 17 2000
RECEIVED

(X) approve
voted to: ( ) deny the Hillsdale County Solid Waste Management Plan Update.

Beth Caswell
Clerk

July 10, 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED JUL 1 7 2000

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The ALLEN TOWNSHIP BOARD, at a meeting held on
(Unit of Government)
JULY 11, 2000 AT 7:30 P.M.
Date & Time

voted to: (X) approve
( ) deny the Hillsdale County Solid Waste Management Plan Update.

Sandra J. Carn
Clerk SANDRA J. CARN

JULY 11, 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED JUL 28 2000

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The Township of Amboy, at a meeting held on
(Unit of Government)
July 12, 2000 7:30 PM,
Date & Time

voted to: (x) approve
( ) deny the Hillsdale County Solid Waste Management Plan Update.

Clerk

July 12, 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED SEP 18 2000

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The Township of Cambria, at a meeting held on
(Unit of Government)
July 10, 2000,
Date & Time

voted to: (X) approve
( ) deny the Hillsdale County Solid Waste Management Plan Update.

Carol A. Zinser
Clerk

July 10, 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED AUG 0 3 2000

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The Fayette Township, at a meeting held on
(Unit of Government)
July 18, 2000 7:30PM
Date & Time

voted to: (X) approve
( ) deny the Hillsdale County Solid Waste Management Plan Update.

Floyd L Bordner
Clerk

Aug 3, 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED OCT 1 2 2000

Hillsdale County Solid Waste Plan Update
APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The TOWNSHIP OF HILLSDALE at a meeting held on
(Unit of Government)
OCTOBER 10 2000 8:15pm
Date & Time

voted to: (X) approve ( ) deny the Hillsdale County Solid Waste Management Plan Update.

Connie Wigent Condon
Clerk

10-10-00
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED SEP 19 2000

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The JEFFERSON TOWNSHIP BOARD, at a meeting held on
(Unit of Government)
AUGUST 15,2000, HAVING BEEN CALLED TO ORDER AT 7:30 PM,
Date & Time

voted to: (X) approve
( ) deny the Hillsdale County Solid Waste Management Plan Update.

Clerk MARK MARINO

SEPTEMBER 13, 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED AUG 1 4 2000

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The Moscow Township Board at a meeting held on
(Unit of Government)
August 10, 8:25pm,
Date & Time

voted to: (x) approve
( ) deny the Hillsdale County Solid Waste Management Plan Update.

James Garner
Clerk

August 10, 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The Pittsford Township Board at a meeting held on
(Unit of Government)
August 14, 2000,
Date & Time

voted to: (✓) approve
( ) deny the Hillsdale County Solid Waste Management Plan Update.

Carol Cornett Frine
Clerk

September 22, 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED AUG 1 6 2000

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The Ransom Township, at a meeting held on
(Unit of Government)
7-10-00 9:15 PM,
Date & Time

voted to: (X) approve
( ) deny the Hillsdale County Solid Waste Management Plan Update.

Clerk

8-14-00
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED AUG 4 2000

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The Township of Reading, at a meeting held on
(Unit of Government)
Monday, July 10, 2000, @ 7:00 PM
Date & Time

voted to: (X) approve ( ) deny the Hillsdale County Solid Waste Management Plan Update.

Roger Wheeler
Clerk

July 10, 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED JUL 2 9 2000

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The TOWNSHIP OF SOMERSET, at a meeting held on
(Unit of Government)
JULY 20, 2000,
Date & Time

(X) approve
voted to: ( ) deny the Hillsdale County Solid Waste Management Plan Update.

Deborah L. Spicer
Clerk

JULY 24, 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The Wheatland Township Board, at a meeting held on
(Unit of Government)

July 5, 2000 at 8:00 p.m.,
Date & Time

voted to: (x) approve
( ) deny the Hillsdale County Solid Waste Management Plan Update.

Dawn Johnson
Clerk

7-5-2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED AUG 1 7 2000

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The Woodbridge Township, at a meeting held on
(Unit of Government)
August 3, 2000,
Date & Time

voted to: (✓) approve ( ) deny the Hillsdale County Solid Waste Management Plan Update.

Marsha Crow
Clerk

August 4, 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED AUG 1 7 2000

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The Township of WRIGHT, at a meeting held on
(Unit of Government)
July 13, 2000 @ 7:30pm,
Date & Time

voted to: (✓) approve ( ) deny the Hillsdale County Solid Waste Management Plan Update.

Lou J Kiss
Clerk

7/13/2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED JUL 3 1 2000

Hillsdale County Solid Waste Plan Update
APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The City of Hillsdale, at a meeting held on
(Unit of Government)
July 17, 2000,
Date & Time

voted to: (X) approve
( ) deny the Hillsdale County Solid Waste Management Plan Update.

Audrey M. Dunten
Clerk Audrey M. Dunten

July 28, 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The Litchfield City Council, at a meeting held on
(Unit of Government)
10 July 2000, 6:30 PM,
Date & Time

voted to: (x) approve
( ) deny the Hillsdale County Solid Waste Management Plan Update.

Roger D. Sprague
Clerk Roger D. Sprague

11 July 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED OCT 18 2000

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The City of Reading, at a meeting held on
(Unit of Government)

October 10, 2000 7:00 PM
Date & Time

voted to: (✓) approve ( ) deny the Hillsdale County Solid Waste Management Plan Update.

Kimberly Blythe
Clerk Kimberly Blythe

October 10, 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED AUG 1 7 2000

Hillsdale County Solid Waste Plan Update

APPROVAL OF HILLSDALE COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

Dear Hillsdale County Commissioners:

The CAMDEN VILLAGE, at a meeting held on
(Unit of Government)

AUG. 15, 2000 7:30 P.M.
Date & Time

voted to: (X) approve
( ) deny the Hillsdale County Solid Waste Management Plan Update.

JOAN MATTHEWS, CLERK
Clerk

AUGUST 15, 2000
Date

Please return this form with a copy of the minutes of the meeting at which action was taken on this amendment to:

Ms. Deb Coffing, Secretary
Hillsdale County Board of Commissioners
29 N. Howell Street
Hillsdale, Mi 49242

RECEIVED JUL 2 1 2000

VILLAGE OF JONESVILLE

265 E. CHICAGO STREET, JONESVILLE, MICHIGAN 49250
PHONE: (517) 849-2104 • FAX: (517) 849-9037

July 20, 2000

Deb Coffing
Hillsdale County Board of Commissioners
Courthouse - 2nd Floor
29 North Howell Street
Hillsdale, Mi 49242

Dear Deb:

Please be advised that the Jonesville Village Council, at their meeting on July 19, 2000, approved the Hillsdale County Solid Waste Management Plan Update (as approved by the Solid Waste Planning Committee on May 24, 2000).

Thank you

David T. Steel
Interim Manager

DTS/blb