

GUAM RECEIVER MEMORANDUM

TO: H. Gershman, D. Manning, T. Bratton, C. Lund, and D. Seader
FROM: Chace Anderson (Receiver Operations Manager)
DATE: 5/25/08
RE: Receivership: Proposed Banning of yard waste, untreated lumber, inert material and OCC (Old Corrugated Containers) from the Ordot Dump and Transfer Stations

Summary of Memorandum:

- Goal is to extend capacity at Ordot Dump until new landfill is open;
- EPA Guam had recommended that yard waste, untreated lumber, and inert material be banned from the dump;
- Banning this material will help increase compaction and extend life of the landfill;
- Private facilities for each of these items have been found on Guam;
- Recommendation:
 1. Develop and send letters to commercial haulers, customers on routes, and Mayors stating that these materials will be banned and when;
 2. Create and place sign at Dump's entrance notifying all customers of the ban and when it will take place;
 3. Create and deliver Public Service Announcements to all media outlets; and
 4. Notify Governor and other VIPs before ban is in effect.
 5. Banning Rules for Ordot Dump:
 - o No yard/green waste
 - o No inert material
 - o No OCC
 - o No untreated lumber
 - o Mixed loads (loads consisting of above material) will be turned away

Material:

The 1995 Waste Characterization study had found the following:

Category of Material	Percent
OCC	(Wet Season) 18.65% (Dry) 14.89%
Yard Waste	(Wet) 11.77% (Dry) 24.0%
Untreated Lumber	(Wet) 1.40% (Dry) 2.87%
Inert Material	(Wet) 0.00% (Dry) 0.097%

Current activity on the active face shows that roll off containers regularly come in with yard waste and untreated lumber as well as inert material. These materials come in both

segregated and mixed. OCC is seen coming out of front end loader collection vehicles as well as roll off containers. The Mayors regularly bring in truck and trailer loads of green waste. Front End loaders also bring in considerable amount of OCC into the Dump.

This material is hard to compact, some of it can be recycled, and all of it can go to other locations already existing in the private sector. The following pictures show material currently being dumped at the Ordot Dump.

TrashCo, a commercial hauler, brings in OCC and pallets:



Inert materials are coming in. Some we are diverting to use on roads; some have been going into the active face.



Alternative Disposal Sites:

1. Northern Hardfill (Operated by Primo's Heavy Equipment) Green Waste/Wood Waste and Construction Demolition Debris

Location: Yigo (Rt. 15 – Backroad to AAFB)

Operational hours: 8:00am – 5:00pm Weekdays and Saturdays

Closed from 12pm – 1pm (Weekdays and Saturdays) and Sundays

The Northern Hardfill is privately owned and operated by Primo's Heavy Equipment. It receives green waste and construction and demolition debris from residents, private companies, military and other government projects. Current disposal fee for green waste is \$4.00 per cubic yard.

The green waste and wood waste are grinded and turned into mulch. The mulch/ woodchips are given free to residents. Their equipment, a horizontal grinder, is regularly maintained.

Future Expansion: It is expected that their operations will expand upon securing the lease of the lot next to the Dededo Transfer Station under the Chamorro Land Trust.



Horizontal grinder of Primo's



Feeding tree trunk into the horizontal grinder



Green Waste/ Wood Waste Section



Hardfill (mortar, rubble, inert) Section

2. Guam Transport and Warehouse (GT&W)

Paper Recycler - Office paper, Newspaper Magazines, Phone Books, Non- Corrugated cardboards, color paper, Envelopes, etc.

Location: Harmon Industrial Park

Operational hours: 8:00am – 5:00pm Weekdays
8:00am – 12:00pm Saturday

GTW accepts commonly used paper products free of charge. Paper products (fiber) are dropped off, shredded, baled, and shipped to Taiwan. They do not buy paper products from residents or private businesses. They accept all kinds of paper products including textbooks, phone books, flat cardboards. GT&W also offers paper shredding services, trucking and warehousing.

Equipment available: 1 baler and shredder which can handle up to 4,000 lbs of paper. Currently they ship approximately 2-5 containers a month of paper to Taiwan. Usual daily operations for paper recycling is up to 1,500 lbs/day.

Future Expansion: GT&W may expand current recycling operations should there be a considerable amount of paper to be recycled.

3. Mr. Rubbishman (Guahan Waste Recycling)

Corrugated Cardboard

Location: Harmon Industrial Park

Operational hours: 8:00am – 5:00pm Weekdays

The facility owned and operated by Mr. Rubbishman currently receives and collects OCC which it then bales and ships to China. Customers can have dumpsters located at their facilities which Mr. Rubbbishman will collect.

Education Activity Needed:

The following steps are recommended to be taken to provide adequate education of the ban before it goes into effect.

- Draft and send letters to commercial haulers and all Mayors (see attached draft);
- Residential customers on SWMD's trash collection routes will also be mailed notification that our collectors will not collect banned material (if we should decide to begin banning from non-commercial customers);
- Sign put up at all Transfer Stations and Ordot Dump;
- Public Service Announcement sent to all media outlets;
- Map of facilities that accept banned material and which are permitted;
- Active face operators and spotters must be fully briefed and encouraged to engage operators of vehicles to understand their waste composition and what will happen if they are found with banned material in their disposed load.

Enforcement:

The following steps are recommended to be taken to provide adequate enforcement of the ban before it goes into effect.

- Active face operators and spotters must be fully briefed and encouraged to engage operators of vehicles to understand their waste composition and what will happen if they are found with banned material in their disposed load;
- Spotters and scale house technicians view material to be disposed and deny access if it includes banned material;
- If banned material is taken to the active face and dumped, the operator of the vehicle will be given a written Notice of Warning;
- EPA Guam will be asked to regularly watch the road to Ordot Dump during the first two weeks of the ban to cite illegal dumpers;
- SWMD should also be vigilant with watching for illegal dumpers on that road by having people;
- Once a second infraction is determined the entity will be excluded from using the Transfer Stations and Ordot Dump. The following are two proposed outlines for possible actions against those who transgress the ban at both the Transfer Stations and Ordot Dump:

Assumes we do not have to go to PUC:

1st infraction = 5 times the normal tip fee paid

2nd infraction = 10 times the normal tip fee paid

3rd infraction = 2 week ban plus 10 times the tip fee paid on the offending load

4th infraction = 4 week ban plus 10 times the tip fee paid on the offending load

Assumes we would have to go to PUC for financial penalty:

1st infraction = 1 warning

2nd infraction = 1 week ban (whole company)

3rd infraction = 2 week ban (whole company)

- If the entity making the infraction is a commercial, Gov Guam department, or a village public entity, then all will have their respective fleet excluded from Transfer Stations and Ordot Dump;
- If the entity making the infraction is a citizen, then that citizen will be banned from said facilities for same length of time as the other entities.

Potential Customer Reactions to This Policy:

Mayors: Each Mayor has a public works staff that keeps local parks and road ways clean of green waste. Primo's is located in Yigo (up north) so those in the south will have to travel further. Mayors have been generally supportive.

Commercial Customers: An owner of a commercial hauling company was in the office and I asked him about the potential reaction to such a ban. His response was that it was a business opportunity for the haulers. The ban will force his clients to separate, hence need more containers and hauls. He also said that it is something that has been discussed for years so it would not be a surprise.

Citizens: Material coming from residences is small in weight. Brush will most likely not be taken to grinding site; it may be kept in the yard or tossed among trees. OCC may get taken to either recycling location or dropped in OCC recycling drop off. Expect residential green waste to stay in the backyard or among trees; OCC recycling will increase.

Trash Collectors: OCC in the front end loaders will be a problem for the haulers because drivers are not able to see the material in the dumpster before it is dumped. From viewing the active face, these trucks regularly dump significant amounts of OCC. Expect companies

running front end loaders to ask for more time to educate customers. Rear loader trucks are capable of leaving behind the banned material.

Clients of Residential Collections: We could send each residential customer notification. Once collectors begin to leave behind OCC and other banned material, complaints will increase at our customer call center, calls to politicians will increase, calls of missed collections will increase causing our inspectors to spend more time checking and using more tags.

DRAFT LETTER

Dear Customer,

In an effort to increase recycling, extend capacity at the Ordot Dump, and comply with The Ordot Dump Waste Management Permit issued by the Guam EPA in 2005 (Permit No. 05-060LFL) request to ban specific materials from entering and being buried at the Ordot Dump, the following items will neither be accepted for disposal at the Ordot Dump nor accepted at any of the Solid Waste Management Division's Transfer Stations. These items are the following:

- No Old Corrugated Containers (cardboard)
- No Yard / Green Waste (tree limbs and brush)
- No Untreated and unpainted Wood (wood free from preservative and paint)
- No Inert Material (hard fill made up of rock, pavement, and concrete)
- No Mixed Loads (loads that combine any one or more of the above banned material mixed with acceptable materials)

This ban will be implemented on Friday June 6, 2008.

Beginning on June 6, 2008, attendants will view all material coming into the Ordot Dump for the purpose of keeping banned materials out of the landfill. If the customer is found to have dumped materials that include banned material a written Notice of Violation will be written and served to the operator.

Once a second infraction is determined the entity will be excluded from using any and all Transfer Stations and Ordot Dump. The following shows the term of these bans:

- 1st infraction = written notice
- 2nd infraction = 1 week ban
- 3rd infraction = 2 week ban
- 4th infraction = 3 week ban

If the entity making the infraction includes, but not limited to, a commercial, Gov Guam department, or a village public entity, then all will have their respective fleet excluded from Transfer Stations and Ordot Dump during the term of these bans.

Please find attached a pamphlet showing the names and locations of known facilities that take some or all of these banned materials.

Thank you for your understanding and patience in this attempt to recycle materials and/or conserve and extend the capacity of the dump.

Sincerely,