

# Non-Hazardous Solid Waste Policy Update

John Coho, HQ ECC

Brian Wilson, NWP ECC

Francisco Salazar, SPA ECC

Stacy Dunkin, SWT

**NRM Workshop – Norman,  
Oklahoma**

Apr 18 – 20, 2017



# Non-Hazardous Solid Waste Policy Update

## ■ Purpose

- ▶ Establish guidance and procedures for meeting federal requirements
- ▶ Emphasize Integrated Solid Waste Management program development
- ▶ Promote Sustainable Acquisition
- ▶ Systematically minimize landfilling
- ▶ Leverage existing authority to retain proceeds derived from solid waste



# Non-Hazardous Solid Waste Policy Update

## ■ Drivers

- ▶ Executive Order 13693
- ▶ Public Law 114-113, Div. E, § 706
- ▶ Unified Facilities Criteria 1-200-2 (HPSB)
- ▶ Unified Facilities Guide Specifications
- ▶ DoD Instruction 4715.23 ISWM Policy
- ▶ Engineering and Construction Bulletin No. 2015-19
- ▶ USACE Policy for Collection of CW Appropriation Refunds, CERM-F
- ▶ **ERGO Checklist Item (NEW)**



# Non-Hazardous Solid Waste Policy Update

## ■ Requirements

- ▶ Divert at least [50%](#) non-hazardous solid waste, including food and compostable material, and visitor-generated non-hazardous solid waste
- ▶ Divert at least [60%](#) non-hazardous C&D materials and debris
- ▶ Quantify and report **Project** and **Visitor** generated solid waste and diversion
- ▶ Quarterly CRAFT data entry



# Non-Hazardous Solid Waste Policy Update

## ■ Calculation

- ▶ IAW – Guidance for Calculating Federal Compliance with EO 13693 Waste Diversion Goals (**WGR = 50%**)
- ▶ Council on Environmental Quality (CEQ) Interim Guidance for Waste Goal Rate

### Waste Goal Rate (WGR) Equation:

$$\text{WGR} = \frac{\text{TWD} + \text{CWC}}{\text{TWS}} \times 100$$

$$\text{WGR} = \frac{1,000 \text{ tons} + 490 \text{ tons}}{3,000 \text{ tons}} \times 100 = 50\%$$

**TWD** = Total Waste Diverted

**CWC** = Credit for Waste Converted

**TWS** = Total Waste Stream





# Non-Hazardous Solid Waste Policy Update

## Complaints

- Add separate visitor-generated waste into own metric
- Add mechanism for documenting cost of recycling
- Benefit Cost of switching SW contract to a contractor who provides recycling services will be higher
- Allow Projects to “opt-out” of metric tracking if local services are not available or are too costly
- This is just another unfunded mandate even though requirements are known

## HQ Response

- Any solid waste disposal/recycling using USACE funds is considered USACE waste
- USACE will work w/ERDC to include data element in CRAFT to track type/cost of services
- Policy language states implementation where relevant services are available in local market at reasonable cost
- All USACE facilities must quantify and report solid waste disposal regardless of availability of diversion services
- USACE must track and report solid waste disposal and diversion IAW federal requirements



# Questions?

