March 10, 2020

To Whom It May Concern:

Pope/Douglas Solid Waste Management (PDSWM) supports the efforts of the Minnesota 2020 legislative session regarding passage of SF3225 and HF3180 on removal of Perfluoroalkyl Substances (PFAS) used in food packaging related to its manufacture, distribution and sales within Minnesota. While the effort is appreciated and needed in our state, PDSWM has concerns with the aggressive implementation timeline to have Perfluoroalkyl Substances (PFAS) removed by Jan 1, 2021. PDSWM supports a realistic phased in approach as to avoid product access disruptions over the course of 3-5 years.

PDSWM will be constructing Phase I of our 8-County Regional Organics Recycling Transfer Station during the summer of 2020. Phase II build out of the Composting Facility will occur 2022-2023 to serve the growing needs of managing organics (currently makes up 25% of the waste stream). The regional project partners consist of; Pope, Douglas, Grant, Stevens, Otter Tail, Stearns, Benton, and Sherburne Counties.

Due to long-term environmental concerns surrounding water quality and human health, PDSWM strongly urges legislative action to address one of the sources of Perfluoroalkyl Substances (PFAS) relating to composting operations. Perfluoroalkyl Substances (PFAS) contamination in compost site operations significantly drives up operational cost and leachate/contact water management.

The Composting Council (MNCC), Minnesota Pollution Control Agency (MPCA), MN Solid Waste Administrators Association (SWAA) recognize composting/organics recycling within the solid waste hierarchy as a more preferred environmental action compared to landfiling organics. Landfiling organics contributes to heighten levels of Greenhouse Gas Emissions (GHG).

We have on-going Senate and House support in our regional service area to expand organics recycling access in our area of the state.

We would be happy to reach out personally to any of our elected officials to lead to a successful outcome of developing these much needed removal of Perfluoroalkyl Substances (PFAS) used in food packaging.

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cc: Steve Vrchota, PDSWM Executive Director