CLEAN AIR ON EVERY BLOCK

A PEOPLE'S VISION FOR A ZERO WASTE FUTURE IN MIAMI-DADE COUNTY
Florida Rising is a statewide independent political organization committed to organizing a multi-racial movement to win elections, change laws, and create a state where everyone can be safe, happy, healthy, and whole. Our membership-led organization represents over 800 members and thousands of supporters in 11 counties, including Miami-Dade. Here, our members have made it clear that their priority is ensuring a true Zero Waste and Clean Air future for our county.

Since 2019, Florida Rising has been organizing in Doral, the site of the now-defunct Covanta-operated incinerator. We have knocked on thousands of doors, held four education sessions, attended every County Commission meeting for the last 20 months, participated in the Mayor’s town halls where incineration and zero waste were discussed, and spent countless hours researching, listening, and strategizing in our local People’s Assembly and campaign committee meetings.

Our members, many of them bearing the devastating health and quality of life impacts of the trash-burning facility, started by calling for its removal and ending Covanta’s contract when it was up for renewal earlier this year. Over time, it became clear that a call to end toxic trash burning would require a long-term transition and commitment to zero waste principles that address the problem at its core: soaring waste production.

This memo outlines our vision and recommendations for the Zero Waste Master Plan, including a series of questions to help us better understand current problems and solutions. We intend to co-develop a plan with County staff and supported by our elected representatives at the County Commission that intentionally includes the voices of Miami-Dade residents, Florida Rising members, environmental justice organizations, and zero waste experts, and ultimately reduces waste, minimizes the impact on the environment and human health, and phasing out unacceptable waste management practices like incineration¹. **Florida Rising believes that a Zero Waste Clean Air future is not a utopian vision but a set of policies, budgetary decisions, and daily practices that will require the leadership of Miami-Dade County residents, County staff, and the County Commission to make reality. We look forward to working with your team on the transition.**

¹ [https://www.energyjustice.net/zerowaste](https://www.energyjustice.net/zerowaste)
WHAT IS ZERO WASTE?

The Zero Waste International Alliance offers this internationally peer-reviewed definition of “zero waste” that has been referenced or recognized by municipalities across the country, including Austin, TX; Baltimore, MD; Hawai’i County, Hi; Boston, MA; Boulder, CO; Chula Vista, CA; Dallas, TX; Delaware County, PA; Los Angeles, CA; Missoula, MT; Montgomery County, MD; Oakland, CA; Oceanside, CA; Palo Alto, CA; San Diego, CA; Washington, DC, the Commonwealth of the Northern Mariana Islands and many other U.S. and international agencies.

“The conservation of all resources by means of responsible production, consumption, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health.” Notably, their internationally recognized zero waste hierarchy categorizes incineration and “waste to energy” as “unacceptable” forms of waste management. This definition is cited by Aracadis in their August 2023 report.²

In Miami-Dade, incineration is being cited as a form of “material recovery” where materials that can’t be managed through redesign, reduction, reuse, and recycling/composting are salvaged. However, ZWIA guidelines are clear that zero waste excludes incineration, calling it a form of “destructive disposal³.”

Even the EPA has historically included “energy recovery” only as the second to last preferred form of waste management and is in the process of conducting research through 2026 to revisit its hierarchy that conflicts with the internationally recognized hierarchy referenced above⁴.

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² https://www.epa.gov/transforming-waste-tool/how-communities-have-defined-zero-waste
³ https://zwia.org/zwh/
Global Alliance of Incineration Alternatives (GAIA) offers a series of zero-waste principles that Florida Rising is using to inform our assessments of any proposals to address the urgent matter of Miami-Dade’s waste management needs⁵.

1. Implementing a goal to end waste disposal in dumps, landfills, and incinerators.
2. Requiring producers to redesign and take responsibility for the entire lifecycle of their products.
3. Ensuring we do not consume more than the planet can continue to provide.
4. Developing systems and infrastructure to separate discards and recover maximum resources for reuse, recycling, and composting.
5. Grounding decision-making in social and environmental justice, respecting and engaging all sectors that form the resources ecosystem.

Support and questions regarding the August 18, 2023, memo on the development of an integrated solid waste management plan

We are grateful for the proposals outlined in the Administration's thorough memo to the Board of County Commissions on August 18, 2023, regarding the Development of an Integrated Solid Waste Management Plan. Many of the proposals are in line with the principles outlined above, with the significant exception of the proposed continued dependence on incineration.

1. Explore any opportunities to divert waste from our landfills that could be implemented in the short term, particularly repurposing yard waste and composting food waste and other organics.
2. To not reactivate the 40-year-old toxic trash-burning facility in Doral.
3. The development of a Materials Separation Plan which should include a program for collecting and recycling recovered material from the institutional, commercial, and industrial sectors, a waste reduction program for yard trash, and a county procurement program to procure products or materials with recycled content. We understand that this recommendation comes because of a requirement to secure federal and state permits for building a toxic trash

⁵ https://www.no-burn.org/
building facility. We believe that a robust Materials Separation Plan is essential to achieving a zero-waste future.

4. Create a zero-waste master plan with a 90% or greater diversion from landfills and incinerators.

Despite these positive steps, we have the following concerns and questions:

- **Inclusion of new incinerators**: Florida Rising strongly opposes further investment in toxic trash-burning facilities. Please refer to the next section on incineration for more information.

- **Restitution**: In discussing the recommendation not to make the Doral facility operational again, the memo did not include a clean-up plan for the site to stop further impacts on human health or offer compensation for residents whose health has been impacted by the facility throughout its 40-year lifespan. The county should learn from the mistakes of the City of Miami in failing to properly maintain and clean the property and care for the health of the victims of Old Smokey, which operated in West Coconut Grove from 1925 to 1970. In the case of Old Smokey, University of Miami researchers discovered a cluster of pancreatic cancer cases in the West Grove decades after the facility shut down. ⁶
  - Will the County recommend a clean-up plan for the Doral site?
  - Will the Administration recommend a restitution plan to compensate Doral residents for the impact on their health?

- **Zero Waste Goal**: Page 3 (recommendation #10) says, “The Administration will prepare a Zero Waste Master Plan with the long-term goal of achieving 90% or greater diversion from landfills and incinerators.” However, the Arcadis memo that’s attached lists the goal as diversion from landfills. Further, the recommended goal is not set to a timeline. As indicated in the August 2023 Arcadis Preliminary Solid Waste System Siting Alternatives Report, comparable municipalities set their zero waste goals on timelines that vary from 8 years (King County) to 25 years (San Diego and New York). We recommend a 10-year timeline to reach the needed scale on par with the average estimated project duration (10.21 years) of the proposed trash-burning facility across the seven sites Arcadis analyzed. The Administration’s preferred site has an estimated project duration of 9 years and three months.
  - Is the Administration recommending a goal of 90% diversion from landfills

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only or landfills and incinerators?
- What is the intended timeline for achieving the diversion goal? Will the Administration recommend a 10-year timeline for the goal?

**Incineration is unacceptable waste management**

Despite the many euphemisms ("incinerator," "waste-to-energy," "resource recovery", "chemical recycling," "pyrolysis," "gasification," and "cement kilns"), facilities that burn trash as a form of waste management are detrimental to the health of people and the planet. The stories of our members in Doral, who have borne the brunt of short-sighted waste management practices by past County leadership, are painful reminders of the real impact of the data compiled by our team and our partners at EarthJustice:

**Patricia Villar, Community Member and Resident of Doral**

Zero waste is a way of life that should guide how we all live to respect the environment. Not only for ourselves but for future generations. I believe we all have a moral obligation to care for our planet and live in such a way that minimizes our environmental footprint.

We are approximately 7.8 billion people on this planet, and whenever I think about how we manage the resources we have access to, this quote from Gandhi comes to mind: “Earth provides enough to satisfy every man’s needs, but not every man’s greed.”

I don’t understand how we can debate the future of zero waste. In my opinion, elected officials should vote based on whether a proposal aligns with zero waste goals because it’s the only way for us to protect our planet, not based on economic or political considerations. Does the current proposal align with the conservation of resources and responsible production? If the answer is yes, we can consider it. If the answer is no, we should not even consider the proposal.

**Ana Vale, Resident of Doral**

My experience living next to an incinerator has been traumatizing because it is an invisible and hidden enemy to human health. The impact is so severe and widespread that it’s hard to track specific symptoms back to so much contamination, especially since doctors medicate blindly and end up doing more harm than good.
**Impact on human health:** The Miami-Dade County Resources Recovery Facility (“Covanta Incinerator” or “facility”) is a waste-combusting energy generation facility located in Doral, Florida. As a result of its air emissions, the Covanta Incinerator significantly impacts the public health and the quality of life of the surrounding community. Residents have reported intense odors and eyes and throat burning, making it impossible to be outside as a result of the incinerator, and studies have shown that pollution from incinerators can cause respiratory problems, lung and skin cancer, kidney disease, and increased risk of miscarriage. The proposed 4,000-ton-per-day incineration facility would be larger than the previous Doral facility and could create more health impacts due to its larger size.

**Worse than coal burning:** Even with pollution controls required of trash incinerators since 2005, compared with coal-burning energy generation, incineration still releases 6.4 times as much of the notoriously toxic pollutant mercury to produce the equivalent amount of energy\(^8\) \(^9\).

**Mass burn and gasification technology do not solve human health and environmental concerns:** Despite the assurances from the County that the proposed mass burn technology addresses our community’s health and environmental concerns, we continue to oppose any form of trash-burning because “a solution to one pollutant problem, may make other pollutants problems worse. For example, the demand for higher furnace temperatures and better combustion to combat the dioxin problem led to higher nitric oxide formation, the greater liberation of toxic metals, and reduced mercury control (less soot available for mercury absorption)\(^10\).” Further, gasification is considered a form of incineration and should not be included in a true Zero Waste Master Plan\(^11\).

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\(^9\) [https://www.energyjustice.net/incineration/worsethancoal](https://www.energyjustice.net/incineration/worsethancoal)


Environmental injustice along lines of race and socioeconomic status: The Covanta Incinerator also poses significant environmental justice concerns: 92% of the population within three miles of the facility are minorities, and 36% live below the poverty line, as compared to just 15% living below the poverty line across the County as a whole. Furthermore, Doral is home to many additional sources of pollution that contribute to the area’s overall contamination.

Evidence of civil rights violations: On March 31, 2022, Earthjustice filed a Civil Rights Complaint against FDEP with the U.S. Environmental Protection Agency (“EPA”). Earthjustice alleged procedural and substantive violations of several federal acts and regulations in this complaint. Specifically, with respect to this memorandum, Earthjustice alleged that FDEP acted discriminatorily in the siting of its ten incinerators statewide by failing to consider environmental justice in permitting.

History of state permit violation: The Doral facility applied for a Title V permit renewal under the Clean Air Act on August 1, 2021, and the Florida Department of Environmental Protection (“FDEP”) issued a draft permit on November 2, 2021. Earthjustice submitted public comments opposing the issuance of this permit and specifically requesting a public hearing on behalf of Florida Rising on December 20, 2021. In March 2022, Earthjustice, on behalf of Florida Rising, issued a complaint to the Environmental Protection Agency (EPA) aimed at FDEP handling of the public hearing with the community of Doral. The complaint states that FDEP discriminated against non-English speakers, from not publishing official notices in other languages like Spanish to failing to provide proper Spanish-language interpretation at the agency's official events. Due to its size, the proposed 4,000-ton-per-day incineration facility could face more permitting challenges.

Challenges with EPA regulations: Further, we see the Administration’s belief that Miami-Dade residents will be well-served by more stringent EPA regulations that would apply to a new facility. We believe that this is incorrect based on a series of faulty assumptions summarized by our partners at the Global Alliance for Incinerator Alternatives (GAIA) in their June 2008 Report “Incinerators Trash Community Health.”
Because emissions limits are often scientifically arbitrary, because emissions are inaccurately measured, and because even poor regulations that do exist can be ignored, it is simply fraudulent to claim, as the incinerator companies do, that incinerators are “safe and clean.” This is far from the truth.

Incompatible with Zero Waste:

**Investing in an over $1.5 billion venture to build a new toxic trash-burning facility while developing a zero waste master plan is at best, inefficient and at worst, disingenuous.** We believe a "true" Zero Waste Master Plan can become the county’s Solid Waste Management with adequate funding and time.

**Table ES.3 and ES.4 of the August 2023** Arcadis report, compares a snapshot of 2021 waste management costs using the current infrastructure with estimated costs to manage the same 2021 tonnage using additional zero waste systems. This analysis has three problems:

- Excludes potential new revenue from recycling markets and taxes from zero waste jobs created (50x more jobs created by recycling than landfills and incinerators according to one study¹²) which would bring the real total cost down. Florida Rising recommends that the County commission an analysis of zero waste system revenue streams and annual projections.

• Includes toxic trash burning facilities (mass burn and gasification) as a kind of zero waste facility. Trash burning is not a form of zero waste because it is hazardous to human health and the environment, and it does not promote a culture change from overconsumption to a circular system of resource preservation, reuse, and redesign. Florida Rising recommends that the the County commission a similar projection for a true zero waste system without trash burning.

Trash-burning facility contracts, like the county’s one with Covanta, have a minimum tonnage requirement. This arrangement disincentivizes investment in system that reduce, reuse, and recycle waste to comply with these minimum waste requirements for corporate operators. Incinerators not only compete for the same materials as recycling programs, they rely on these materials that could otherwise be recycled or composted¹³. A “zero waste plan” that includes trash-burning in any form (i.e. mass burn, gasification) is setting us up to fail.

The transition to zero waste will take significant time and financial investment. But so will the financing and building of a new trash-burning facility. The difference is that an investment in zero-waste infrastructure is also an investment in public health, green jobs, the planet, and community trust in the local government’s ability to respond to and care for its residents.

Choosing to build the new trash-burning facility will effectively divert resources from the healthier and more environmentally friendly zero-waste transition. It is of the utmost importance to Florida Rising members that the the County recommends the route that fundamentally transforms our waste management strategy and that funds designated for green energy and environmental projects at both the federal and state levels are not allocated toward the construction of a new incinerator in the county. Instead, these funds should be used to support the implementation of zero-waste policies and initiatives.

¹³ https://www.no-burn.org/zero-incineration/
The charts below are generated using data in the August 2023 Arcadis report.

<table>
<thead>
<tr>
<th>COST TO PROCESS 2021 TONNAGE LEVELS</th>
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<tr>
<td>Current system</td>
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<td>$211.8M</td>
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<tr>
<th>PROJECT DURATION</th>
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<tr>
<td>Mass burn facility at old Opa-Locka Airport site</td>
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<tr>
<td>9.25 years</td>
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**Outside the Urban Development Boundary:** We are so grateful for the the County’s leadership in 2022 opposing and vetoing the expansion of the Urban Development Boundary which was “instituted...in the early 1980s in an effort to limit urban sprawl and protect agriculture and our natural resources.” The Administration’s preferred site for the new facility is outside the UDB. Florida Rising opposes development outside the UDB.

**Our commitment to a local, state, and federal approach**

We understand that true zero-waste plans require the cooperation and coordination of federal, state, and local governments. Florida Rising is committed to working alongside Miami-Dade County leadership to advocate for the funding and policies needed to achieve our County’s zero-waste goal.

**State of Florida:** Unfortunately, Florida’s state legislature is an advocate of incineration as evidenced by the passage of SB1764 in 2022, which created a grant program to incentivize trash-burning capacity expansion. Florida Rising members have voted to oppose bills and budget allocations for new incinerators. As an alternative, we are looking to advance a bill that would:

- Amend the Financial Assistance Grant program to stipulate that the Office of Air Monitoring within DEP must first measure air quality and particulate

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matter in all Environmental Justice zones within 25 miles of the project submitted by the applicant. In order for an applicant to be considered eligible, the results of these measurements must meet the minimum standards of air quality and particulate matter set by the Environmental Protection Agency.

• Stop funding new projects from the Incentive Grant Program until an Environmental Justice evaluation of impacted low-income and historically marginalized residential areas has determined the new project would have negligible impact on these communities, and would not decrease the air quality or increase the particulate matter to a point that exceeds the standards set by the EPA.

Federal

• Florida Rising will continue to monitor the EPA’s research process and look to inform the development of their updated waste management hierarchy. Further, we’re committed to continuing to challenge the EPA to fully enforce current policies regulating air and water quality surrounding trash-burning facilities.

• Florida Rising is monitoring announcements of new funding opportunities offered by the Inflation Reduction Action and is committed to working alongside partner organizations and municipal governments like Miami-Dade to apply for funds to facilitate a zero-waste future.

Florida Rising’s Zero Waste Priorities

Set up the county for a real transition to zero waste in the next ten years.

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<tr>
<th>QUESTIONS</th>
<th>RECOMMENDATIONS</th>
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<tr>
<td>• Is the Administration recommending a goal of 90% diversion from landfills only or landfills and incinerators? What is the intended timeline for achieving the diversion goal? Will the Administration recommend a 10-year timeline for the goal?</td>
<td>• Pause advancement of the financing for the proposed Opa-Locka incinerator until the Zero Waste Master Plan is complete.</td>
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<tr>
<td>• What is the timeline for the development</td>
<td>• Convene a Zero Waste Task Force that includes County staff, community members, including a Florida Rising Doral member, and representatives of environmental justice</td>
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</table>
organizations to develop the Zero Waste Master Plan. Specifically, the Task Force should develop a plan to improve the County’s recycling program, focusing on reducing contamination levels and minimizing the volume of recyclable materials ending up in landfills.

• Update the Zero Waste Master Plan goal to 90% diversion from landfills and incinerators by ten years to reach the needed scale on par with the average estimated project duration (10.21 years) of the proposed trash-burning facility across the seven sites Arcadis analyzed. The Administration’s preferred site has an estimated project duration of 9 years and 3 months.

• Set a goal and plan to reduce per capita solid waste generation in Miami-Dade County and setting a target to bring this metric down from its current levels (~9.2 pounds per person per day) to the US national average (in 2018, it was 4.9 pounds per person per day) in the next ten years. This plan should, at minimum, include the following points:
  - Establish a baseline. Implement monitoring and reporting systems to track performance versus waste reduction goals.
  - Develop regulatory measures (through local ordinances, reward systems, and, if possible, penalties) to encourage waste reduction and recycling.
  - Collaborate with educational institutions, municipalities, and community organizations to launch a campaign to increase public awareness and education on Zero Waste Plan.

• Commission an analysis of zero-waste system revenue streams and annual projections.

• Commission cost projections for a true zero-waste system without trash burning.

• Work with the County Commissioners of the Zero Waste Master Plan? What role is there for the community and environmental justice community in the development of the plan? What is the difference between the zero waste plan and the integrated solid waste plan?

• What is the timeline for approving and implementing the proposed compost expansion?

• How has the county utilized IRA funding received to date?

• What state, local, or federal grants or loans are currently accessible for zero-waste programs? Have there been efforts to apply for and secure such funding?
**QUESTIONS**

- What is the status of Plastic Free 305, which showcases businesses that take action to reduce or eliminate single-use plastics? How many businesses are currently participating?
- Does the County have other programs that incentivize redesign, reduce, reuse, and recycle business practices?
- Does Miami-Dade have any current ordinances regulating waste generation from businesses? How are the funds (if any) collected from enforcing these measures being utilized?
- How does the County currently charge for processing C&D waste management? C&D waste represents about 19% of our waste, but only 14% is recycled or reused in some way.

**RECOMMENDATIONS**

- Expand the County’s commitment to a countywide “PlasticFree”-style program in 2024.
- Increase enforcement and penalties for illegal dumping and utilize the funds for cleanup and education.
- Prioritize the creation of a C&D recycling facility coupled with a C&D recycling mandate ordinance.
- Litigate against corporations who violate zero waste business regulations to recover costs of damage to communities and invest in the Zero Waste Master Plan.
### QUESTIONS

- What portion of the Department of Solid Waste Management budget is used for public education?
- What portion of that is focused on promoting “waste-to-energy” versus educating on reduce/reuse/recycle and zero waste?
- Will the County recommend a clean-up plan for the Doral site?
- Will the County develop and implement a restitution plan to make whole Doral residents impacted by the incinerator fire?

### RECOMMENDATIONS

- Expand funding for Zero Waste Programs' participation, outreach, and education to educate and engage businesses, organizations, public agencies, and residents on existing programs and opportunities.
- We recommend the county provide restitution for the damage to human health. Develop a proposal for clean-up of the Doral site beyond covering the ash monofil. The plan should ensure that contaminants do not leach into the subsoil, impacting nearby residences, schools, public parks, and commercial businesses.

### Care for families who have been harmed by current incineration.
Financing a zero waste, clean air future through revenues from recycling markets

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<td>• What revenues are currently being generated from the sale of recyclable materials?</td>
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<tr>
<td>• How are these revenues being reinvested into zero-waste programs?</td>
<td>• Selling collected recyclable materials to local businesses.</td>
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<td></td>
<td>• Investing revenues in zero-waste infrastructure and public education campaigns.</td>
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Update monitoring and reporting

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<th>QUESTIONS</th>
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<td>• Are there existing partnerships with local universities on zero-waste research or programs?</td>
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<tr>
<td>• How have these partnerships contributed to financing or supporting zero-waste initiatives?</td>
<td></td>
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<tr>
<td>• Who manages air quality monitors at waste management sites?</td>
<td>• Collaborating with universities on grant-funded research projects.</td>
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<td></td>
<td>• Publishing real-time dashboards from air quality monitors open to the public to rebuild public trust.</td>
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<tr>
<td></td>
<td>• Regularly reporting on co-mingling, contamination rates, and recycling/composting rates to build public trust in new infrastructure.</td>
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Service provision by local for-profit businesses

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<tr>
<td>• Are there local businesses engaged in service provision for recycling or other zero-waste programs?</td>
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<td></td>
<td>• Contracting with local zero-waste companies for service provision.</td>
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<td>QUESTIONS</td>
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<tr>
<td>Have subsidies for fossil fuels and incineration been identified and evaluated?</td>
<td>Reallocating funds from fossil fuel subsidies to renewable energy and recycling programs.</td>
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<tr>
<td>What steps have been taken to redirect these subsidies towards zero-waste initiatives?</td>
<td>Policy advocacy for shifting subsidies towards zero-waste goals.</td>
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**Eliminating subsidies for fossil fuels and incineration**

- Reallocating funds from fossil fuel subsidies to renewable energy and recycling programs.
- Policy advocacy for shifting subsidies towards zero-waste goals.

**Requiring producers and retailers to manage their products end-of-life**

- Highlight businesses with transparent take-back programs for recycling or proper disposal of products.

- Providing tax incentives or subsidies to encourage local business participation.
- Prioritize proposals for county contracts from entities that are zero-waste certified.

- Prioritize proposals for county contracts from entities that are zero-waste certified.
Miami-Dade is at the epicenter of a climate crisis and is currently dealing with a waste problem. The Miami-Dade County Commission must align with community and Mayor Daniella Levine-Cava's vision to create a zero waste master plan and avoid repeating the same mistakes to the detriment of people and planet. The transition to zero waste will take significant time and financial incentives and require us to transform our waste management systems instead of further pouring resources into the existing harmful ones. With shifts in policy and budgetary investments, we can reduce waste production and pollution, create much-needed local jobs, and protect human health for generations to come. Florida Rising looks forward to the work ahead.