TABLE ES-2
ALTERNATIVE DISPOSAL SYSTEM
MAJOR ADVANTAGES AND DISADVANTAGES

NATURAL ENVIRONMENTAL CONSIDERATIONS (MOST IMPORTANT PRIORITY)

Criterion	Indicator	*System 1* *Mechanical, Biological Treatment with Biogas Recovery*	*System 2 (a)* *Thermal Treatment of MSW & Recovery of Materials from Ash/Char*	*System 2 (b)* *Thermal Treatment of Solid Recovered Fuel*	*System 2 (c)* *Thermal Treatment of Solid Recovered Fuel with Biogas Recovery*
Criterion 1: **Environmental burden at a global or macro-environmental scale, including impacts to air, land and water.**	**Predicted Emissions released to atmosphere by system**	***MAJOR ADVANTAGE*** • Lowest net emissions of Greenhouse Gases (tonnes) • Lower net emissions of Acid Gases (tonnes) • Highest net emissions of Smog Precursors (tonnes) • Lowest net emissions of Heavy Metals & Organics to Air	**MAJOR DISADVANTAGE** • Highest Net emissions of Greenhouse Gases (tonnes) • Highest net emissions of Acid Gases (tonnes) • Higher net emissions of Smog Precursors (tonnes) • Highest net emissions of Heavy Metals & Organics to Air	**DISADVANTAGE** • Higher net emissions of Greenhouse Gases (tonnes) • Lower net emissions of Acid Gases (tonnes) • Lower net emissions of Smog Precursors (tonnes) • Higher net emissions of Heavy Metals & Organics to Air	**DISADVANTAGE** • Higher net emissions of Greenhouse Gases (tonnes) • Lowest net emissions of Acid Gases (tonnes) • Lowest net emissions of Smog Precursors (tonnes) • Lower net emissions of Heavy Metals & Organics to Air
	Predicted pollutants released to water resources by system	**MAJOR DISADVANTAGE** • Highest net emissions of Heavy Metals & Organics to Water.	***MAJOR ADVANTAGE*** • Lowest net emissions of Heavy Metals & Organics to Water.	**ADVANTAGE** • Lower net emissions of Heavy Metals & Organics to Water	**NEUTRAL** • Higher emissions of Heavy Metals & Organics to Water
	Need to manage residues classified as hazardous waste associated with system.	• Hazardous elements remain in materials processed and/or landfilled and may be emitted by way of landfill emissions / collected by landfill pollution control systems. • No hazardous waste stream associated with residue from Facility Air Pollution Control Equipment associated with system.	• Approximately 15,500 tonnes per year of hazardous residue from pollution control equipment requires management at a licensed facility if the quantity of residual material managed by the facility is 400,000 TPY. • Costs to manage hazardous wastes at an approved facility have been included in estimated system costs.	• Approximately 8,500 tonnes per year of hazardous residue from pollution control equipment requires management at a licensed facility if the quantity of residual material managed by the facility is 400,000 TPY. • Costs to manage hazardous wastes at an approved facility have been included in estimated system costs.	• Approximately 5,500 tonnes per year of hazardous residue from pollution control equipment requires management at a licensed facility if the quantity of residual material managed by the facility is 400,000 TPY. • Costs to manage hazardous wastes at an approved facility have been included in estimated system costs.
		NEUTRAL • Opposing views of this consideration weigh segregation of hazardous materials and proper management versus discharging via mixed waste to landfill where they may or may not leach out of the disposed wastes.			

Table ES-2

Alternative Disposal Systems – Comparative Evaluation

Criterion	Indicator	System 1 *Mechanical, Biological Treatment with Biogas Recovery*	System 2 (a) *Thermal Treatment of MSW & Recovery of Materials from Ash/Char*	System 2 (b) *Thermal Treatment of Solid Recovered Fuel*	System 2 (c) *Thermal Treatment of Solid Recovered Fuel with Biogas Recovery*
Criterion 1: **Environmental burden at a global or macro-environmental scale, including impacts to air, land and water.** *(cont'd)*	**Impacts to land by system.**	**MAJOR DISADVANTAGE** • Siting process for a 11.4 ha Mechanical/Biological treatment facility in an urban/industrial setting will provide a high likelihood that facility location makes an appropriate use of land resources. • Primary facility site would likely be located within a designated urban boundary and/or on lands appropriately designated for the use. • Due to lack of approved landfill capacity within Durham and York, assumed that landfill capacity for residues would exist at a licensed municipal or private landfill. • A minimum of 287,000 cubic metres of landfill space will be required annually to dispose of system residues.	***MAJOR ADVANTAGE*** • Siting process for a 9.6 ha thermal facility in an urban/industrial setting will provide a high likelihood that facility location makes an appropriate use of land resources. • Primary facility site would likely be located within a designated urban boundary and/or on lands appropriately designated for the use. • Due to lack of approved landfill capacity within Durham and York, assumed that landfill capacity for residues would exist at a licensed municipal or private landfill. • A minimum of 50,000 cubic metres of landfill space will be required annually to dispose of system residues.	**ADVANTAGE** • Siting process for a 14.6 ha thermal facility in an urban/industrial setting will provide a high likelihood that facility location makes an appropriate use of land resources. • Primary facility site would likely be located within a designated urban boundary and/or on lands appropriately designated for the use. • Due to lack of approved landfill capacity within Durham and York, assumed that landfill capacity for residues would exist at a licensed municipal or private landfill. • A minimum of 81,000 cubic metres of landfill space will be required annually to dispose of system residues.	**NEUTRAL** • Siting process for a 13.5 ha thermal facility in an urban/industrial setting will provide a high likelihood that facility location makes an appropriate use of land resources. • Primary facility site would likely be located within a designated urban boundary and/or on lands appropriately designated for the use. • Due to lack of approved landfill capacity within Durham and York, assumed that landfill capacity for residues would exist at a licensed municipal or private landfill. • A minimum of 114,000 cubic metres of landfill space will be required annually to dispose of system residues.
Criterion 1:	OVERALL	DISADVANTAGE	MAJOR ADVANTAGE	ADVANTAGE	NEUTRAL
Criterion 2: **Consumption/preservation of non-renewable environmental resources.**	**Potential of system to consume non-renewable fossil fuel or displace non-renewable fossil fuel consumption for energy generation.**	**MAJOR DISADVANTAGE** • Net lifecycle energy (i.e. electricity, heat, virgin material displacement credit, etc.) impact of 606,357 GJ conserved annually. • Net Electrical Energy Generation from renewable sources of 10,313 MWh	***MAJOR ADVANTAGE*** • Net lifecycle energy (i.e. electricity, heat, virgin material displacement credit, etc.) impact of 1,348,786 GJ conserved annually. • Net Electrical Energy Generation from renewable sources of 86,180 MWh	***MAJOR ADVANTAGE*** • Net lifecycle energy (i.e. electricity, heat, virgin material displacement credit, etc.) impact of 1,428,480 GJ conserved annually. • Net Electrical Energy Generation from renewable sources of 85,673 MWh	**ADVANTAGE** • Net lifecycle energy (i.e. electricity, heat, virgin material displacement credit, etc.) impact of 1,230,067GJ conserved annually. • Net Electrical Energy Generation from renewable sources of 56,822 MWh
Criterion 3: **Potential for destruction or disruption of sensitive terrestrial and/or aquatic habitats at an eventual site.**	**Total Volume of Landfill Capacity Required to manage Post-Processing Residual Waste**	**MAJOR DISADVANTAGE** • **Significant** requirement for landfill disposal of system residues increases potential for removal or disruption of sensitive natural habitats due to typically rural setting of landfill facilities.	***MAJOR ADVANTAGE*** • **Low** requirement for landfill disposal of system residues reduces potential for removal or disruption of sensitive natural habitats due to typically rural setting of landfill facilities.	**ADVANTAGE** • **Low/Moderate** requirement for landfill disposal of system residues reduces potential for removal or disruption of sensitive natural habitats due to typically rural setting of landfill facilities.	**NEUTRAL** • **Moderate** requirement for landfill disposal of system residues reduces potential for removal or disruption of sensitive natural habitats due to typically rural setting of landfill facilities.
		• Estimated 11.4 ha. Site Requirement	• Estimated 9.6 ha. Site Requirement	• Estimated 14.6 ha. Site Requirement	• Estimated 13.5 ha. Site Requirement

Criterion	Indicator	System 1 *Mechanical, Biological Treatment with Biogas Recovery*	System 2 (a) *Thermal Treatment of MSW & Recovery of Materials from Ash/Char*	System 2 (b) *Thermal Treatment of Solid Recovered Fuel*	System 2 (c) *Thermal Treatment of Solid Recovered Fuel with Biogas Recovery*
	Land use setting typically associated with establishment of facilities comprising system.	**NEUTRAL** • All facility(ies) site(s) can be located in designated urban area and on industrially designated lands with potential for impacts on sensitive habitats unlikely.			
Criterion 3:	OVERALL	MAJOR DISADVANTAGE	MAJOR ADVANTAGE	ADVANTAGE	NEUTRAL
Criterion 4: **Potential to increase diversion rate and/or make best use of residual (post-diversion) waste materials.**	**Potential of system facilities to remove any remaining materials in the post-diversion waste stream for use in a non-disposal manner.**	***MAJOR ADVANTAGE*** • System ensures achievement of 60% diversion target and offers potential 10% increase in rate of diversion from disposal to 70%.	**ADVANTAGE** • System ensures achievement of 60% diversion target and in existing regulatory environment offers potential 2% increase in rate of diversion from disposal to 62%.	***MAJOR ADVANTAGE*** • System ensures achievement of 60% diversion target and in existing regulatory environment offers potential 8% increase in rate of diversion from disposal to 68%.	***MAJOR ADVANTAGE*** • System ensures achievement of 60% diversion target and in existing regulatory environment offers potential 10% increase in rate of diversion from disposal to 70%.
	Potential of system facilities to manage and make beneficial use of materials in the post-diversion waste stream including those materials for which diversion may decline or disappear in the future.	**ADVANTAGE** • **Moderate** - If markets for compost and recycled paper fibres were to decline, this system could anaerobically digest these materials to recover energy. • If there were approved markets for Class B compost and use of some recovered materials as aggregate, diversion from landfill disposal could increase to 84%.	***MAJOR ADVANTAGE*** • **High** - If markets for recycled plastics, low-value paper etc. were to decline or disappear, this system could recover significant quantities of energy from these materials. • In addition, if European practice of curing and recycling bottom ash into aggregate materials was approved in Ontario, diversion from landfill disposal could increase to 95%.	***MAJOR ADVANTAGE*** • **High** - If markets for recycled plastics, low-value paper etc. were to decline or disappear, this system could recover significant quantities of energy from these materials. • In addition, if European practice of curing and recycling bottom ash into aggregate materials was approved in Ontario, diversion from landfill disposal could increase to 89%.	***MAJOR ADVANTAGE*** • **High** - If markets for recycled plastics, low-value paper etc. were to decline or disappear, this system could recover significant quantities of energy from these materials. • In addition, if European practice of curing and recycling bottom ash into aggregate materials was approved in Ontario, diversion from landfill disposal could increase to 87%.
Criterion 4:	OVERALL	ADVANTAGE	ADVANTAGE	MAJOR ADVANTAGE	MAJOR ADVANTAGE
NATURAL ENVIRONMENTAL CONSIDERATIONS	OVERALL	DISADVANTAGE	MAJOR ADVANTAGE	MAJOR ADVANTAGE	ADVANTAGE

SOCIAL / CULTURAL CONSIDERATIONS (IMPORTANT PRIORITY)

Criterion	Indicator	System 1 *Mechanical, Biological Treatment with Biogas Recovery*	System 2 (a) *Thermal Treatment of MSW & Recovery of Materials from Ash/Char*	System 2 (b) *Thermal Treatment of Solid recovered fuel*	System 2 (c) *Thermal Treatment of Solid recovered fuel with Biogas Recovery*
Criterion 5: **Potential for land use conflicts from siting of facilities required for alternative.**	**Number of waste management facilities associated with alternative system.**	**NEUTRAL** • For comparative purposes it is assumed that all components of all of the alternative residuals processing systems would be located at a single location within Durham/York. As a result, all systems would have the same relative impact regarding the number of waste management facilities. The 'single facility, single site' system configuration represents the most efficient system configuration and would provide the economies of scale that are being sought in the Durham/York study. In general, a 'single facility, single site' configuration also represents the configuration which would be expected to have a lower potential for environmental and social impacts, as the total land area required and number of potential receptors that could be impacted by the systems, increases as the number of sites required for each system increases.			
	Potential for land use conflicts considering location requirements of waste management facilities.	**MAJOR DISADVANTAGE** • For comparative purposes it is assumed that all components of the MBT System would be located at a single location within Durham/York. • MBT facility would likely be located within a designated urban boundary and/or on lands appropriately designated for the use. • Significant quantity of residual materials (30% of total waste stream) will require landfill disposal at a facility located outside of the study area, resulting in a higher potential for land use conflicts associated with export to waste in other communities. • Highest potential traffic related impacts, related to the haul of materials from the thermal facility to landfill.	***MAJOR ADVANTAGE*** • For comparative purposes it is assumed that all components of the Thermal System would be located at a single location within Durham/York. • Thermal facility would likely be located within a designated urban boundary and/or on lands appropriately designated for the use. • Small quantity of residual materials (9% of total waste stream) will require landfill disposal at a facility located outside of the study area, resulting in a low potential for land use conflicts associated with export to waste in other communities. • Lowest potential traffic related impacts, related to the haul of materials from the MBT/thermal facility to landfill.	***MAJOR ADVANTAGE*** • For comparative purposes it is assumed that all components of the MBT/Thermal System would be located at a single location within Durham/York. • MBT/Thermal facility would likely be located within a designated urban boundary and/or on lands appropriately designated for the use. • Small quantity of residual materials (13% of total waste stream) will require landfill disposal at a facility located outside of the study area, resulting in a low potential for land use conflicts associated with export to waste in other communities. • Low potential traffic related impacts, related to the haul of materials from the MBT/thermal facility to landfill.	**NEUTRAL** • For comparative purposes it is assumed that all components of the MBT/Thermal System would be located at a single location within Durham/York. • MBT/Thermal facility would likely be located within a designated urban boundary and/or on lands appropriately designated for the use. • Moderate quantity of residual materials (18% of total waste stream) will require landfill disposal at a facility located outside of the study area, resulting in some potential for land use conflicts associated with export to waste in other communities. • Low potential traffic related impacts, related to the haul of materials from the MBT facility to landfill.
Criterion 5: **Potential for land use conflicts from siting of facilities required for alternative.** ***(cont'd)***	**Types and degree of Nuisance impacts associated with waste management facilities based on Operational experience**	**MAJOR DISADVANTAGE** • Relatively equivalent potential impacts for most nuisance related parameters (dust, noise, litter) • Higher potential for odour related impacts, due to biological component of the MBT system and as potential odorous materials will be hauled from the MBT facility to landfill for disposal.	***MAJOR ADVANTAGE*** • Relatively equivalent potential impacts for most nuisance related parameters (dust, noise, litter) • Lower potential for odour related impacts as there is no biological component of the Thermal system, and as the residue hauled to landfill is inert.	**ADVANTAGE** • Relatively equivalent potential impacts for most nuisance related parameters (dust, noise, litter) • Higher potential for odour related impacts, due to biological component of the system, however, the residue hauled to landfill is inert as all biological residues are combusted.	**DISADVANTAGE** • Relatively equivalent potential impacts for most nuisance related parameters (dust, noise, litter) • Higher potential for odour related impacts, due to biological component of the system and as potential odorous materials will be hauled from the MBT facility to landfill for disposal.
SOCIAL / CULTURAL CONSIDERATIONS	**OVERALL**	**MAJOR DISADVANTAGE**	**MAJOR ADVANTAGE**	**ADVANTAGE**	**DISADVANTAGE**

ECONOMIC / FINANCIAL CONSIDERATIONS (IMPORTANT PRIORITY)

Criterion / Indicator	System 1 *Mechanical, Biological Treatment with Biogas Recovery*	System 2 (a) *Thermal Treatment of MSW & Recovery of Materials from Ash/Char*	System 2 (b) *Thermal Treatment of Solid recovered fuel*	System 2 (c) *Thermal Treatment of Solid recovered fuel with Biogas Recovery*
Criterion 6: **Net system costs per tonne of waste managed – in a systems context. Includes:** • Capital and operating costs over operational period of system (2011 to 2045). • Estimated costs associated with perpetual care of component facilities in accordance with current environmental and municipal accounting requirements. • Estimated revenues associated with system once fully implemented and operational. • Potential subsidies and revenues that may be realized during establishment and future operation of system.	**ADVANTAGE** • Net System Cost per tonne ranges from $114 to $155, including capital, operating, financing, perpetual care, revenues and subsidies.	**ADVANTAGE** • Net System Cost per tonne ranges from $97 to $160, including capital, operating, financing, perpetual care, revenues and subsidies.	**DISADVANTAGE** • Net System Cost per tonne ranges from $116 to $188, including capital, operating, financing, perpetual care, revenues and subsidies.	**MAJOR DISADVANTAGE** • Net System Cost per tonne ranges from $140 to $213, including capital, operating, financing, perpetual care, revenues and subsidies.
Criterion 7: **Sensitivity of system costs and affordability to external financial influences. Includes:** • Types of revenues and subsidies currently available to off-set system costs and predicted sustainability of these sources into the future. • Degree to which system affordability relies on revenues and subsidies during long-term operation of the system.	**MAJOR DISADVANTAGE** • Net system cost assumes markets for recyclable materials recovered from mechanical component of MBT facility and biogas from anaerobic digester. Revenues offset in the range of 13 to 16% of average annual costs. • Revenue from sale of recyclables is likely least secure of all revenue streams. • System generates considerably more post-process residue that would require landfill disposal and therefore will be more susceptible to rising landfill disposal costs.	**NEUTRAL** • Net system cost assumes markets for energy generated from thermal treatment of waste and for materials recovered from ash/char. Revenues off-set approximately 50 to 73% of average annual costs of facility. • Revenue from sale of electricity is likely most secure of all revenue streams. • System would have a minor influence related to the marketplace for disposal of APC residues / ashes / chars.	**NEUTRAL** • Net system cost assumes markets for energy generated from thermal treatment of a solid recovered fuel and for materials recovered from the SRF facility. Revenues off-set approximately 43 to 63% of average annual costs. • Revenue from sale of electricity is likely most secure of all revenue streams. • System would have a minor influence related to the marketplace for disposal of APC residues / ashes / chars.	**DISADVANTAGE** • Net system cost assumes markets for energy generated from thermal treatment of an solid recovered fuel and for materials and biogases recovered from facility that processes MSW into SRF. Revenues off-set approximately 32 to 47% of average annual costs. • Revenue from sale of electricity is likely most secure of all revenue streams. • System would be influenced by marketplace for disposal of APC residues / ashes / chars.
ECONOMIC / FINANCIAL CONSIDERATIONS – OVERALL	**DISADVANTAGE**	**ADVANTAGE**	**DISADVANTAGE**	**MAJOR DISADVANTAGE**

TECHNICAL (IMPORTANT PRIORITY)

Criterion	Indicator	System 1 *Mechanical, Biological Treatment with Biogas Recovery*	System 2 (a) *Thermal Treatment of MSW & Recovery of Materials from Ash/Char*	System 2 (b) *Thermal Treatment of Solid recovered fuel*	System 2 (c) *Thermal Treatment of Solid recovered fuel with Biogas Recovery*
Criterion 8: **Technical risks associated with waste management alternative.**	**Flexibility of alternative system to changes in waste quantities, composition and availability of system diversion and disposal components.**	**ADVANTAGE** • MBT component would be designed for a specified throughput and any quantities over that design capacity would have to be managed by way of extended operating hours or by-pass to a landfill.	**MAJOR DISADVANTAGE** • Although changes to waste characteristics are not a significant issue, significant changes in quantity can be problematic. A reduction in quantity affects the assumed economics of the facility and may be corrected by way of alternate sourcing of feedstock. An increase may require MSW to bypass the facility.	**DISADVANTAGE** • Incorporation of mechanical, biological and thermal components allows for adjustments in process line to accommodate some changes in waste types and quantities.	**DISADVANTAGE** • Incorporation of mechanical, biological and thermal components allows for adjustments in process line to accommodate some changes in waste types and quantities.
Criterion 8: **Technical risks associated with waste management alternative.**	**Reliability of alternative system and component technologies and need for contingency landfill capacity.**	**MAJOR DISADVANTAGE** • MBT component is considered reasonably reliable given past experience with mechanical component although experience with anaerobic digestion of mixed wastes is less common. • High Dependence on landfill capacity elsewhere in the Province results in lowest reliability.	***MAJOR ADVANTAGE*** • Operating experience with this technology has established a reasonable operating track record and a much-improved track record with regards to environmental protection. • Lowest dependence on landfill capacity elsewhere in Province.	DISADVANTAGE • System is dependent on several different types of technologies and mechanical equipment that lends itself to the highest potential for breakdown or failure. • Moderate dependence on landfill capacity elsewhere in Province.	DISADVANTAGE • System is highly dependent on several different types of technologies and mechanical equipment that lends itself to the highest potential for breakdown or failure. • Moderate dependence on landfill capacity elsewhere in Province.
TECHNICAL	**OVERALL**	**MAJOR DISADVANTAGE**	**NEUTRAL**	**DISADVANTAGE**	**DISADVANTAGE**

LEGAL CONSIDERATIONS (LESS IMPORTANT PRIORITY)

Criterion	Indicator	System 1 *Mechanical, Biological Treatment with Biogas Recovery*	System 2 (a) *Thermal Treatment of MSW & Recovery of Materials from Ash/Char*	System 2 (b) *Thermal Treatment of Solid recovered fuel*	System 2 (c) *Thermal Treatment of Solid recovered fuel with Biogas Recovery*
Criterion 9: **Legal / contractual risks associated with waste management alternative.**	**Types and complexity of approvals required implementing components of system.**	**DISADVANTAGE** • System will require at a minimum, approval under the Ontario Environmental Assessment Act and Ontario Environmental Protection Act. • MBT facility would likely be located within a designated urban boundary and/or on lands appropriately designated for the use. Accordingly, potential for land use conflicts would be minimal and may facilitate obtaining the necessary approvals to implement and operate the facility. • System has higher landfill requirements, so that while MBT component may be more acceptable for approval within Durham and York, the use of a significant quantity of landfill space outside of the study area is likely to be less acceptable (particularly for the host community).	**NEUTRAL** • System will require at a minimum, approval under the Ontario Environmental Assessment Act and Ontario Environmental Protection Act. • Thermal facility would likely be located within a designated urban boundary and/or on lands appropriately designated for the use. Accordingly, potential for land use conflicts would be minimal and may facilitate obtaining the necessary approvals to implement and operate the facility.	**NEUTRAL** • System will require at a minimum, approval under the Ontario Environmental Assessment Act and Ontario Environmental Protection Act. • Thermal facility would likely be located within a designated urban boundary and/or on lands appropriately designated for the use. Accordingly, potential for land use conflicts would be minimal and may facilitate obtaining the necessary approvals to implement and operate the facility.	**NEUTRAL** • System will require at a minimum, approval under the Ontario Environmental Assessment Act and Ontario Environmental Protection Act. • Thermal facility would likely be located within a designated urban boundary and/or on lands appropriately designated for the use. Accordingly, potential for land use conflicts would be minimal and may facilitate obtaining the necessary approvals to implement and operate the facility.
Criterion 9: **Legal / contractual risks associated with waste management alternative.** ***(cont'd)***	**Degree to which system implementation and operation relies on private or public sector partnerships.**	**MAJOR DISADVANTAGE** **Implementation:** • MBT technologies are largely propriety and will likely require some form of contractual arrangement with the private sector vendor(s) for implementation. • System requires considerable landfill disposal capacity that must be obtained through contract with a third party. **Operation:** • Assumed in evaluation operation of MBT facilities is contracted out to the private sector. However, the respective municipalities could operate publicly if the necessary staff were retained and trained on facility operations.	**DISADVANTAGE** **Implementation:** • Thermal technologies are largely propriety and will likely require some form of contractual arrangement with the private sector vendor(s) for implementation. **Operation:** • Assumed in evaluation operation of thermal facilities is contracted out to the private sector. However, the respective municipalities could operate publicly if the necessary staff were retained and trained on facility operations.	**DISADVANTAGE** **Implementation:** • Thermal and MBT technologies are largely propriety and will likely require some form of contractual arrangement with the private sector vendor(s) for implementation. **Operation:** • Assumed in evaluation operation of thermal facilities is contracted out to the private sector. However, the respective municipalities could operate publicly if the necessary staff were retained and trained on facility operations.	**DISADVANTAGE** **Implementation:** • Thermal and MBT technologies are largely propriety and will likely require some form of contractual arrangement with the private sector vendor(s) for implementation. **Operation:** • Assumed in evaluation operation of thermal facilities is contracted out to the private sector. However, the respective municipalities could operate publicly if the necessary staff were retained and trained on facility operations.
LEGAL CONSIDERATIONS	OVERALL	MAJOR DISADVANTAGE	DISADVANTAGE	DISADVANTAGE	DISADVANTAGE