
REPORT

TO: STEVE GIESBRECHT, BOROUGH MANAGER
MAYOR JENSEN AND BOROUGH ASSEMBLY
FROM: KARL HAGERMAN, PUBLIC WORKS DIRECTOR KH
SUBJECT: LANDFILL SALVAGE PROGRAM
DATE: 1/15/2014
CC: KATHY O'REAR, BOROUGH CLERK

The sanitation department is considering a change in the Landfill Salvage Program that would disallow the salvage and resale of non-ferrous and ferrous metals to scrap metal markets outside of Petersburg. The program would still allow for customers to purchase a permit and salvage parts, pieces and materials from the landfill metal pile according to the rules of the written program. All materials salvaged from the metal pile would be reused in Petersburg.

The questions posed to the Assembly in this process is: Is the Assembly supportive of administrative changes to the Landfill Salvage Program that would eliminate private commercial profiteering from metals in the landfill scrap pile?

The following information should be helpful for the Assembly in reaching consensus on this question.

Value of Scrap Removed by Commercial Scrap Salvagers

In speaking with Ole Whitethorn about the amount of private revenues realized from the scrap pile by salvagers wishing to be sold to scrap markets in Seattle, he estimates anywhere from \$60,000 to \$100,000 is received from non-ferrous metals removed from the landfill. This estimate is based on his personal income and an educated guess on the volume and value of non-ferrous metals taken by other salvagers.

On average, the total weight of materials salvaged from the landfill equals approximately 133,000 lbs per year. The department has no breakdown of this weight but a substantial amount of wood also leaves the landfill on an annual basis and is used locally for small construction projects or firewood. I estimate that 50% of the salvaged weight is wood and another 25% is being reused in the community. This indicates that 25% of the removed metals or 33,250 lbs per year are sold to scrap metal markets. If Mr. Whitethorn's estimated range of scrap value is correct, this means that scrap salvagers are receiving approximately \$1.80 - \$3.00 per pound for the materials they are removing and selling. This is equal to \$3,600 - \$6,000 per ton.

In comparison, the Borough received a bid of \$67.50 per ton for the bulk scrap pile in 2013. This was for a 1000 ton pile of miscellaneous ferrous and non-ferrous metals – which had been picked over by the local salvagers. It takes a lot of time to separate the more valuable materials from the bulk of the pile after they have been dropped off. It is not conceivable that Borough labor could extract the same amount of value as the private salvagers are realizing,

unless additional staff was hired. The additional expense of labor would offset any increased revenues from such an effort. The take away from this is that it is probably better to retain the highest value of the metal pile as possible without increasing departmental expenses. Over time, higher prices will be offered by large scrap metal companies when the Borough offers up the bulk pile for removal and sale.

When asked via email, Pool Engineering, a Ketchikan-based scrap metal company, indicated that his company would definitely offer a higher bid per ton for a scrap pile that had not been picked over for non-ferrous metals. This is in direct contrast to statement made by Mr. Whitethorn that the bulk scrap companies would not increase bidding for a pile that was not high graded by others.

Salvage Customer Information

Approximately 500 salvage permits are sold over the course of a calendar year. Approximately 5-8 of these permits are annual permits and about half of these annual permits are sold to individuals that are known scrap metal resellers.

Predominantly, the salvage customers that we sell permits to are visiting the landfill to find a car or appliance part, a small engine project, an art project, some lumber for a small building project or some firewood. These customers are who the program was intended to serve and they are very appreciative of the opportunity to find useful items that others have thrown away. These are the customers that we should be catering to so that a service is provided to the community, but one that limits the financial impact to the sanitation department.

Inversely, the small number of profiteering salvagers cause the greatest amount of operational oversight, program questions and contention between themselves and others.

Other Community's Salvage Programs

Ketchikan - Lenny Neely, Solid Waste Director, City of Ketchikan, tells me that they have a salvage program in place. The program runs much as Petersburg's does, with a permit and fee system in place to allow salvaging. Ketchikan does ship out their loose scrap on a continual basis and loads their scrap metals into a shipping container on a regular basis to keep up with the incoming volume. Salvagers are allowed to remove anything from the pile before it is loaded for shipment. After the material is loaded, it is off limits for salvage. There are three daily salvagers that are at the landfill every day. One salvager reported to Mr. Neely that he makes approximately \$55,000 per year off of the program. The annual permit cost in Ketchikan is \$25. Mr. Neely has been with the City for about 4 years and hasn't attempted to change any part of the salvaging program since his hiring. However, he has started to think about the value to the City of Ketchikan that is being lost to private individuals and may be reviewing his program in the future to retain more value for his employer. Also of note is that a local company offers to accept all scrap metals in Ketchikan at no charge, so the City has seen a large reduction in scrap metal volumes that enter their facility due to the influence of private industry.

Sitka - Michael Harmon, Public Works Director, City and Borough of Sitka, indicated that Sitka has a very effective scrap metal system in place. They process all scrap through a

shear/baler, including junked cars, that bales the scrap and concentrates the weight for more beneficial revenues after shipping costs to markets in Seattle. Sitka has actually offered free towing at different times of the year due to the value they are receiving from car bodies and the benefits to the community of removing many derelict vehicles that are an eyesore and hazard. With this emphasis on scrap metals as a revenue stream for the City and Borough, it is not surprising that there is little emphasis on a salvage program in Sitka. The scrap yard operators do allow informal and isolated salvaging of small parts from time to time, but there is no formal salvage program in Sitka.

Wrangell – Wrangell's new Public Works Project Manager, Ruby McMurren, indicated that Wrangell has struggled with scrap metal in the past. They attempted to contract for the continual removal of scrap from the community, but this program failed due to the contractor high grading the available materials and not following through on removal of the less valuable materials. She believes that currently there is no salvage program operating in Wrangell. My past conversations with Carl Johnson, Public Works Director, are similar to Ms. McMurren's statements.

Additional Discussion Topics

Below is a discussion on some issues that have occurred over the course of the salvage program or have recently come to light.

- **Scrap Value** – Ferrous and non-ferrous scrap has gained substantial value in the region since Petersburg's salvage program was started. A certain amount of salvaging for profit within the program was much easier to accept in the beginning as there was no value to the Borough in the scrap pile. However, as regional recyclers have stepped up and provided a decent price for bulk scrap, the sanitation enterprise fund should be changing with the times and attempting to retain as much value in the bulk pile as possible. Limiting high grading of the pile is the best way to retain value without adding significant expenses to the department's budget.
- **Competition** – Locals who have embraced the opportunity to salvage non-ferrous metals and turn them into profit have become extremely competitive. So much so, that they alienate and intimidate other customers so that they may benefit from items that are delivered to the landfill. Increasing the cost of the permit to \$10 per day and eliminating the annual permit are attempts to curb the profitability of non-ferrous salvagers and to lower the competitiveness of the program. However, the only way to truly eliminate the undesirable competitive nature of program is to eliminate the activity that is producing the competitive attitudes – scrap profiteering. If this portion of the program is eliminated, the department has no problem in going back to a lesser cost per day for salvage permits.
- **Charity Concerns** – Recently, Mr. Whitethorn has indicated that he and other salvagers are happy to be able to donate to local charities, programs or individuals in need, due, in part, to the income received from sales of salvaged metals. While this is a very noble activity on the part of these residents, the salvage program was not developed for this purpose. The sanitation department does work with the scouting programs and the Close-up program from the school to give aluminum to them for their sale and

program revenue. This work with youth programs should be considered if weighing the perceived loss of other charitable donations made by scrap salvagers.

Recommendation

The Sanitation department contends that the original intent of the program is valid and is a benefit to the community. The program allows residents to repair or build equipment and facilities with materials that have been discarded by others. The program is currently much more encouraging of salvage activity than other communities, including Ketchikan who has the closest resemblance to the Petersburg program. Additionally, the sanitation department works with various youth programs in the community and provides materials that can be turned into program revenues to support their causes.

There appears to be ample reason to make program changes to retain the salvage program for its original purpose of local reuse, to retain bulk scrap values for the benefit of the utility and to eliminate the highly competitive nature of the existing program. This will benefit the department and therefore it will benefit all of the ratepayers of the department.

I request the Assembly's concurrence with the department's recommendations.

Attached are materials previously developed for the program changes, including a proposal for written program changes, permit changes and the previous memorandum to the Borough Manager on this topic.

MEMORANDUM

TO: STEVE GIESBRECHT, BOROUGH MANAGER
FROM: KARL HAGERMAN, PUBLIC WORKS DIRECTOR *KH*
SUBJECT: LANDFILL SALVAGE PROGRAM – INFORMATION AND RECOMMENDATION
DATE: 12/11/2013
CC: KATHY O'REAR, BOROUGH CLERK

As you know, the Sanitation department has recently supported various changes to Municipal Code Chapter 14.12 which made revisions to account for Borough incorporation, a changed recycling program and also a change to the salvage program fees. The ordinance readings brought in a higher level of scrutiny related to the salvage program change and was a repeated point of discussion among the Assembly members.

The discussion centered on the change from a salvage permit rate structure that included rates for weekly (\$5), monthly (\$15) and yearly (\$100) permits to a daily rate (\$10) only. Note that the number of days that the landfill is open for salvaging is, and has always been, two days per week, Sunday and Monday.

The background of the program and its original intent was discussed during the ordinance readings and public hearing, but for the benefit of this report I will restate this information. The salvage program was brought about by concerned and well-meaning citizens that requested, through the Utility Advisory Board, the development of a program that would allow them to access various usable items that other citizens had thrown away. The development of the program included discussions with ADEC regarding liabilities of such a program and ultimately a program was developed that adequately covered these liabilities through a well-defined written program and permit system. Salvaging for valuable scrap was factored into the original program, but the emphasis was for recycling of discarded items through reuse in the community.

The program has been successful in meeting many citizen's needs for parts and pieces, but it has also transformed into a program that is utilized to a greater degree by commercial metals salvagers for recovery of "precious" non-ferrous metals and sale of those metals to scrap markets. This type of activity, and the high prices being received for this type of scrap, has created a highly competitive atmosphere among the salvagers. This competitive nature that has developed has become a problem for operations staff at the landfill by requiring more time to police and monitor salvaging activities, settle disputes and maintain control over the landfill during non-salvaging hours. The competitive nature of the salvage program caused staff to discuss ways in which to mitigate the "high maintenance" aspects of the program while still maintaining the original intent of the program.

The prices paid by regional scrap metal vendors in general have grown substantially since the salvage program was developed in 2003. This fact has led to two separate instances of profitable bulk scrap removal and sales by the Borough, once in 2010 and once this year in 2013. As this profitability has solidified over the years, it is obvious that the sanitation department has unintentionally established a local business niche in which private salvagers are profiting greatly from Borough scrap metals.

Original program permit fees were developed with program efficiency and value to the customer in mind. These two principles are valid in consideration of the original intent of the program but become less acceptable when realizing that profit margins are very high for commercial scrap metal salvagers who target higher priced scrap commodities.

In consideration of the undesired shift to commercial scrap operators and the increase in value of the scrap pile overall, the department settled on the answer of changing the salvage program to allow for only daily permit sales, at a price of \$10.00 per day. While this is a sizable increase to the previous weekly rate of \$2.50 per day, monthly rate of \$1.87 per day or annual rate of \$0.96 per day, the new fee will recover some of the lost revenue that could have been achieved by the Borough if the scrap was sold in bulk while not placing any one salvager at hardship due to the rate. It was also presumed that if a part or piece desired from the landfill cost less than \$10.00 from a local vendor, then there would be no need to purchase a salvage permit. Local experience shows that it is rare to find appliance, small engine or car parts available for less than \$10.00.

It is unknown if the \$10.00 daily rate will result in less commercial profit salvaging. The increased cost of the permit will decrease profit margins of this particular salvaging group, but probably not enough to completely discourage this type of activity. Selling daily permits only will slow down the Sunday morning rush to the landfill by requiring all salvagers to stop at the scale, fill out a new permit and make payment at the counter.

The issue at hand boils down to how to discourage the scrap metal profiteering activity without impacting other well-meaning salvagers that just want to get a part to fix something in Petersburg. For the department to know that we are meeting the approval of the Assembly with any changes, the question posed to the Assembly is this:

Is the Assembly supportive of administrative changes to the Landfill Salvage Program that would eliminate private commercial profiteering from metals in the landfill scrap pile?

The Sanitation department contends that the original intent of the program is valid and is a benefit to the community. The program allows residents to repair or build equipment and facilities with materials that have been discarded by others. The commercial scrap salvaging for profit activity is not a benefit to the community, only to the individuals that take part in this activity. Further, since the weight removed from the scrap pile and sold for profit is now of value to the Borough, this activity decreases the return on the scrap pile when sold in bulk.

The following numbers are presented to offer some additional information on the salvage poundage and values removed from the landfill. Note that the weight figures include all metal and wood removed from the landfill under the salvage program.

- Total poundage removed from landfill since start of program: 1,479,190 lbs
- Average poundage removed from landfill each year: 134,199 lbs
- Average poundage removed from landfill each month: 11,183 lbs
- Value of removed scrap (as bulk scrap sold by Borough): \$21,448*

*The value to the Borough is in bulk scrap form and only calculated for poundage removed after 2007 when the Borough scrap pile had value to the regional scrap haulers. The revenues received by individual salvagers are much higher per pound due to their focus on non-ferrous metal removal. It is unknown what percentage of the overall salvaged weight was sold for profit or what the market value was for the seller. The value of the Borough's scrap will surely fetch a higher price if regional salvagers know that the scrap pile has not been high graded prior to submitting their proposals for purchase and removal of the bulk pile.

Administrative changes could refocus the program to the original intent of providing a benefit to the community. I recommend that salvaging of any items would only be allowed if the items were to be reused within the community. This would allow residential or "commercial" salvagers to remove items, but would eliminate the highly competitive activity of profiteering from scrap sales to the lower 48. This change would require additional policing by the sanitation staff at first but it is fairly safe to say that we know what can be reused in Petersburg and what is being picked up due to its value

elsewhere. The staff will be diligent on requesting reuse information from salvagers and if the salvaged materials will not be used in Petersburg, the material will remain in the landfill scrap pile.

As the program settles into the original intent, the competitive atmosphere should drop off and less staff time will be required to monitor the program. Once this happens, the department would be supportive of a decrease in salvage permit fees to \$5 per day, which will again encourage the benefit to the community by lowering costs for the parts and pieces salvagers.

Attached to this report is a copy of the current Salvage Permit for the Assembly's review. Also attached is a revised copy of the written Salvage Program with changes proposed to eliminate commercial profiteering from the scrap metal pile. I believe this is the right way to approach this issue and this program. I will be available for questions during the Assembly discussion on this matter on December 16th.

Thank you for your consideration of this issue.

Petersburg Borough Sanitation Department

Landfill Salvage ~~and Recycle~~ Program



Karl Hagerman, Public Works Director
~~January~~Revised November 2013

~~RECYCLING AND SALVAGING~~

LANDFILL SALVAGE PROGRAM

Purpose

The Petersburg Borough has established a ~~recycle~~/salvage program in order to reduce the amount of waste in the landfill **and provide a benefit to the community** by allowing salvageable items to be removed and reused by ~~the~~ citizens. The basis of the program is to allow customers access to specific areas of the landfill for the purpose of salvage and ~~recycling~~ **reuse** of useful items.

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Authority of Program

The Public Works Director maintains authority over the ~~recycle~~/salvage program. The Director reserves the right to terminate the program, in part or in full, if continuation of the program is foreseen as detrimental to the Petersburg Borough.

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Salvaging at the Petersburg Borough Landfill is a privilege. Abuse of the program, violations of salvage rules or unsafe salvage practices will result in this privilege being revoked.

Salvage Permit

All customers wishing to salvage, or helping another permittee, must ~~read~~ **purchase** and sign a salvage permit. Payment for the permit will be required before any salvaging takes place. The permit identifies what they will be salvaging, the length of the permit, the waiver of liability, safety requirements and other stipulations that must be understood by the customer. Permits are available at the baler office. Termination of permits for cause will be done at the discretion of sanitation employees, with concurrence of the Public Works Director.

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Permits are valid on the date of purchase only. Permits that expire must be renewed and all fees paid before the permittee is allowed to salvage again.

Permit Fee

The salvage permit fee shall be \$10.00 per day.

Approved Salvaging Activities

Salvaging within the landfill shall be restricted based on the principle that all materials removed by salvagers shall be beneficially reused in and around Petersburg. All salvagers shall complete the permit question of what they are seeking to salvage and for what purpose. Department staff will monitor materials being salvaged and if profiteering from scrap is the apparent goal of the salvager, the material will not be allowed to leave the landfill.

Salvage operations are further restricted by the terms of this written program.

Safety and Conduct

All salvage operations must be performed in a safe manner. Unsafe practices will result in the permittee's removal from the property. At no time will the permittee be allowed to climb onto a stack of cars or climb onto the metal pile past the leading edge. Permittees must inform sanitation personnel if they plan on using power tools or cutting torches so that safety equipment and fire extinguishers can be checked.

Accessible items in the landfill will be salvaged on a "first come, first served" basis. Material shall be open for any salvager to claim until it is loaded into a Permittee's vehicle. "Marking" or stockpiling materials while perusing the available salvage material, without loading it out, is not allowed.

Children and pets are not allowed within the landfill for salvaging operations.

Harassment of landfill customers or sanitation personnel will not be tolerated.

Arguments among ~~permittees~~ **Permittee's or with sanitation personnel** will not be tolerated.

Restrooms are available for public use, but the baler facility break room is for employees only.

Loitering

Salvaging or loitering in the baler facility is not allowed.

There is no implied permission for any Permittee to dump waste in the landfill area without paying the applicable tipping fee to the sanitation department. If a Permittee is found to be dropping off any waste while salvaging, they will retrieve the material to determine the correct tipping fee and will be banned from the salvage program for a period of 12 months.

Check In/Check Out

PermitteesOn a customer's permitted salvage date, **Permittee's** must check in at the baler office, weigh their vehicle and **purchase**/present their permit ~~when arriving at~~**before proceeding to** the landfill. They must also check out with the office and get a "salvaged material" weight when leaving.

Parking

All permittees will be directed to specified parking locations at the baler and the landfill. Once items are found, the permittee may drive over to the pile and load their salvage.

Maintaining an Orderly Landfill

Any messes left by ~~that can be attributed to a p~~Permittee will be cleaned up at the permittees expense. A minimum of one hour of labor will be charged to the permittee for clean up performed by sanitation personnel. If heavy equipment is used for the clean up, the permittee will pay a minimum charge for its use as well. Payment of these charges will be required before the permittee is allowed to salvage again.

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Junk Car Salvage

Junk cars will be available for salvage if they are not stacked. Cars will be available for a limited number of weeks, determined by landfill personnel, before stacking. No one will be allowed to crawl under a car without blocking in place to prevent crushing injuries. Any fluids that are encountered by the permittee must be cleaned up or drained to a non-leaking container and landfill personnel must be notified. The Public Works Director must approve removal of an entire vehicle from the landfill.

Metal Pile/White Goods

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Permittees will be allowed to salvage from the leading edge of the metal pile only. At no time shall a permittee climb onto the pile to reach an object. ~~White goods (appliances) will be available for parts in the white goods section. Landfill staff will approve removal of entire appliances.~~

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Aluminum, Copper and Brass

~~Salvaging of these materials will be allowed on a "by weight" basis. Salvaged material will be weighed and the permittee will pay the Borough the current market value per pound for this material. This payment is over and above the cost of the permit. Removal of these materials without payment will constitute theft and will result in termination of the permit.~~

Baler Salvage

Salvaging in the baler facility is **not allowed**.

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Salvaging may occur from the totes containing discarded fishing gear, nets or ground line as long as these totes are staged outside of the baler building and a salvage permit has been purchased.

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Wood Salvage

Lumber may be salvaged from the woodpile as long as no sign of fire or smoke are present. Permittees shall not climb onto the woodpile at any time.

Prohibited Areas/Materials

Other items already segregated at the baler for the purposes of borough recycling (ie. cans, plastics, paper ~~and~~, cardboard and copper tubing) will not be available for salvage.

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At no time will permittees be allowed to salvage lumber when the woodpile is on fire or smoldering.

No permittee will be allowed access to the road on the lower side of the landfill.

Permittees are not allowed inside of the ~~HAZMAT container vans~~, the landfill Quonset, the old dump shack or the sewage sludge containment area.

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Permittees and customers are not allowed to salvage in the baler building at any time.

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It is not allowed to salvage "precious" or non-ferrous metals for the sole purpose of profiting from the scrap value of such material.

Hours of Salvage

Current hours of operation pertaining to salvage are as follows:

- o Sundays: 9:00 AM to 3:00 PM.
- o Mondays: 9:00 AM to 3:00 PM.

Salvaging operations will not be allowed on Borough observed holidays.

Normal hours of salvage may be changed or terminated under the discretion of the Public Works Director.

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Assumption of Responsibility

All items taken from the landfill are taken AS IS. Once an item is salvaged and removed from the landfill, that item is then the sole responsibility of the permittee and he/she must pay for disposal if it is taken to the landfill again.

Community Responsibility

It is not the intention of the Petersburg Borough to allow the creation of nuisances in the community. Citizens should endeavor to use all of the salvaged items from the landfill. Public nuisances created by storing excess salvage in a haphazard manner should be avoided at all times.

If complaints are received regarding excess salvaged material on a permittee's property, the Public Works Director may refuse to renew a salvage permit after investigating the allegations.

Storage of material salvaged from the landfill must meet all applicable zoning ordinances as dictated in the Petersburg Municipal Code for all areas within Borough Service Area 1.

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Permit # _____

**PETERSBURG BOROUGH
LANDFILL SALVAGING PERMIT**

Issued to: _____ Date: _____

Mailing address: _____ Phone: _____

To salvage the following: _____

Permit subject to the following conditions:

1. **Permit Fee:** \$10.00/day Amount Paid: _____
2. **Permit Dates/Termination for Cause:** This permit is valid on the date purchased and expires at the end of the salvage period on this date. Permittee is required to have a copy of the valid permit on their person at all times while salvaging. Sanitation department personnel shall oversee the salvaging operations. Sanitation personnel have the right to terminate the operation and revoke this permit for cause at any time. Safety issues, salvaging in non-designated areas, spreading litter, etc. will be considered cause for termination of this permit.
3. **Hold Harmless/Indemnification:** In exchange for the permission granted in this permit, the permittee agrees to release, defend and hold harmless the Petersburg Borough from any and all liability and/or claims of liability for personal injuries or property damage to the permittee, the permittee's agents, employees, heirs or assigns, any third persons or employees of the Petersburg Borough arising from the use of this permit and any activities arising from the use of this permit.
4. **Cleaning of Area:** Permittee agrees to remove all salvage material from the area by the end of the daily salvage period, and to clean the area of materials strewn by the operation. Any labor or equipment time used to clean up after a permittee will be charged to the permittee and their permit may be terminated.
5. **Prohibited Areas:** Permittee shall salvage only in areas designated by the Public Works Director as acceptable for this activity. If sanitation employees observe the permittee in an unapproved location, they will have the right to terminate the permit and remove the permittee from the landfill. Salvaging within the baler facility is not allowed.
6. **Fire Prevention:** The use of powered cutting tools and gas torches will only be allowed if the permittee has in their possession a minimum of a 5# ABC rated fire extinguisher of recent survey. The Petersburg Borough will not supply the permittee with cutting tools or a fire extinguisher for salvage operations.
7. **Hours of Operation:** Permittees will be allowed to salvage in designated areas at the following times:
 - Sundays: 9:00 am to 3:00 pm.
 - Mondays: 9:00 am to 3:00 pm.
8. **Clothing/Equipment:** Permittee agrees to wear work gloves and work boots at all times. Safety glasses will be required when using power tools or performing demolition to access a part. The sanitation department will not provide tools, equipment or assistance for salvage operations.
9. **General:** Any permittee under the influence of alcohol or drugs will be refused permission to salvage. Smoking in the junk car area is prohibited. Children and animals are not allowed in the landfill. Permittee must check in with sanitation employees upon arrival and when leaving the landfill. Vehicle weights will be recorded at check in and check out.
10. **Absence of Warranty:** The Petersburg Borough makes no warranties as to the merchantability or fitness for any purpose of any item salvaged such items are taken AS IS. The permittee that removes any salvage material from the landfill has taken full responsibility of that item and must pay to redeposit it into the landfill at the end of its use.
11. **Termination of Program:** The Public Works Director reserves the right to terminate the salvage program in total, if conditions arise that may cause a hardship on the Petersburg Borough and/or the sanitation department. (i.e., injury, property damage, domestic disputes in the landfill, etc.) It is in the best interest of every party that safety and common sense prevail while salvaging in the landfill.

I have read and understand the Salvaging Permit as well as the Petersburg Borough's written Landfill Salvage Program and agree to abide by all conditions stipulated by these two documents.

Permittee _____ Date: _____

Sanitation dept. _____ Date: _____

This permit is not valid unless paid in advance.¹