



## Testimony in Support of H.560

### Submitted to the Vermont House Committee on Natural Resources, Fish and Wildlife

Chairman Deen and Committee Members,

My name is Bruce Westcott; I serve as General Manager of the District, and am a member of the Vermont Product Stewardship Council (VTPSC). The Council members include every solid waste district and alliance in the state which represents over 85% of the population.

Thank you for providing this opportunity to offer a Central Vermont perspective on the costs and difficulties of legal and environmentally-sound disposal of hazardous wastes in this nineteen-town District. The District is home to about 52,000 residents (estimated 23,000 households) living in two cities, their surrounding municipalities, and several of Vermont's most rural towns.

CVSWMD strongly supports legislative action to address the costs and risks faced by the public in disposing responsibly of these wastes, and welcomes the introduction of H.560 and your discussion of effective action to address them. I am here today to offer you a perspective on the operational problems and the inefficiencies inherent when we must limit our work for our businesses and residents to discrete events.

I believe you do not need to be told about the importance of keeping HHW out of the waste stream. Most people understand how important that is, but what are their alternatives when they've got to get Grandpa's barn cleaned out by the end of the month? When they live in a part of Vermont that does not provide a year-round drop-off facility, no matter how environmentally-aware your neighbors are, what are the odds that the unlabeled jugs end up being left on the farm, put in the trash – that is, headed for the landfill -- or even dumped? I think those odds may be pretty high, when all we can tell people is that they should store them safely until one of our special events, or that they can drive to the Burlington-area facility operated by the Chittenden District.

#### CVSWMD HHW Events

Handling of HHW requires regulated facilities and specialized personnel, available in some regions of the state, but not in Central Vermont. Instead, we offer five seasonal (May-September) Saturday events at various locations, advertise like crazy, and hope we can successfully compete for a slice of someone's busy Saturday when competing with sporting events, family picnics and other activities.

CVSWMD encourages people to work with their neighbors to assemble a "carload" to minimize their fee and our traffic congestion, to drive to one of the events – usually at a Town garage or transfer station, and to be guided by professionals in unloading. They bring sometimes ancient and uncertain materials that can range from household cleaners to scary volatile chemicals. Our staff plan and coordinate the events, interact with the

customer carloads -- directing them to the trained professional contractors, and clean up afterwards.

### Events vs. Facility?

This is a tremendously inefficient expenditure of scarce resources: our events are patronized by only a few hundred households and a handful of businesses; we estimate 2-3% of the District households. In contrast, in a 2015 Social Media survey of the District's "core" municipalities, eighty percent (80%) said that they would bring HHW to a convenient facility in Central Vermont. Such a facility would of course serve residents in a broad region including other Districts and Alliances, not just from our nineteen municipalities, and driving distance would continue to be a deterrent for some. But offering convenient and regular "open" hours for such a facility will go a long way to meeting the needs of people who can't target the special summer Saturdays of our current events. We particularly want to reach out and meet the needs of people who just don't travel from their rural homes into more central areas very often.

### Cost Inefficiencies

I've attached some information on the HHW Budgeting we've done for two recent fiscal years, and would like to point out some considerations in financing and operating HHW events.

- CVSWMD charges per carload fees for patrons of our HHW events. Our fees will cover just an estimated 13% of FY2018 costs, and any increase would further discourage participation. Even so, 29% of estimated costs are covered by District revenues that come from residents. The amount we can expect from an annual VT-DEC grant is crucial in operating our HHW program, but completely inadequate to allow us to contemplate the capital outlay that would be needed for a facility..
- Staff costs (26% of budget, not counting WC and liability insurance) are high because staff have to plan, operate, and do detailed reporting on HHW events. Events are at a distance from our normal operations, and on weekends, so all staff time is dedicated to HHW events, rather than shared with our normal operating staff costs.
- Paid advertising – in addition to low-cost outdoor signage, Social Media "buzz" and other means – is absolutely crucial in conveying repeat messages to our constituents, to encourage them to set aside the date and plan on participating. CVSWMD funds regular outreach and advertising of all our year-round services to the region. These ongoing efforts have significant costs, but because awareness of the timing of our HHW events is so critical, we must spend scarce resources for single purpose ads focused on them.
- Existing CVSWMD facilities cannot be certified for safe storage of HHW, so our cost of contracting for services to handle the waste at each event and to transport it for disposal constitutes nearly half of program costs. A central facility competent to "warehouse" HHW pending periodic pickup would allow us to hire staff certified for local handling of these wastes, and greatly reduce contractor costs relative to HHW volumes collected.

**CVSWMD Hazardous Waste Budget (5 Events)**

|                                       | <b>2017</b>     | <b>2018</b>     | <b>2018%</b> |
|---------------------------------------|-----------------|-----------------|--------------|
| CVSWMD Funds                          | \$44,541        | \$24,181        | 29%          |
| 4050 · Hazardous Waste Income         | \$5,854         | \$10,540        | 13%          |
| 4060 · Grant Income (VT-DEC)          | \$31,416        | \$47,472        | 58%          |
| <b>TOTAL PROGRAM INCOME</b>           | <b>\$81,811</b> | <b>\$82,193</b> | <b>100%</b>  |
| <br>                                  |                 |                 |              |
| <b>6000 · Payroll Expenses</b>        | <b>\$13,527</b> | <b>\$15,545</b> | <b>19%</b>   |
| <b>6004 - Pension &amp; Benefits</b>  | <b>\$4,356</b>  | <b>\$5,899</b>  | <b>7%</b>    |
| 6030&40 - Insurances                  | \$1,000         | \$1,585         | 2%           |
| 6050 · Operating/Office Supplies      | \$50            | \$660           | 1%           |
| 6070 · Vehicle Expense                | \$647           | \$2,000         | 2%           |
| <b>6080 · Advertising</b>             | <b>\$10,000</b> | <b>\$8,500</b>  | <b>10%</b>   |
| 6090 – Communications                 | \$1,576         | \$800           | 1%           |
| 6145 · Trash Expense                  | \$390           | \$500           | 1%           |
| <b>6150 · Hazardous Waste Expense</b> | <b>\$45,000</b> | <b>\$38,419</b> | <b>47%</b>   |
| 6170 · Rent/Leases Expense            | \$2,000         | \$5,985         | 7%           |
| 6180 · Printing Expense               | -               | \$2,000         | 2%           |
| 7000 · Other                          | \$2,200         | \$300           |              |
| <b>TOTAL PROGRAM EXPENSE</b>          | <b>\$80,746</b> | <b>\$82,193</b> | <b>100%</b>  |

Legislation such as H.560 would make two progressive changes to the funding of Hazardous Wastes in Vermont:

1. A financial burden would be shifted from all citizens in the District to producers, and on to those who utilize these products, in the form of the inevitable hikes to product prices.
2. Producer/manufacturer participation could provide the capital reserves needed to plan the move from a regional event-driven HHW program, to a facility-based program, reaching many more households and shown to be measurably more cost-effective.

CVSWMD urges your consideration of both the manufacturer registration and product fees outlined in the bill, and an alternative revenue-generating method that would be similar to the paint environmental producer responsibility legislation already in Vermont law.

Thank you for your consideration of this bill and for the Vermont General Assembly's continuing efforts to be a leader in environmental producer responsibility legislation.