January 9, 2018

The Honorable David L. Deen, Chair House Committee of Natural Resources, Fish and Wildlife

Sent via email to: Christy Ketchel, cketchel@leg.state.vt.us

Subject: In support of H. 560-Conservation and development; hazardous waste; household and hazardous substances

Representative Deen and Committee Members:

My name is John Malter. I am the Administrator for the Mad River Resource Management Alliance(MRRMA). I have been the Administrator of the MRRMA for 22 years and have managed the Household Hazardous Waste(HHW) collection program through this period. This included 44 separate HHW collection events. The program collects HHW from small businesses and residents in the six MRRMA towns; Fayston, Moretown, Roxbury, Waitsfield, Warren and Waterbury serving a population of over 12,000 residents in Washington County.

The MRRMA is a founding member of the Vermont Product Stewardship Council(VTPSC), formed in 2008. VTPSC is comprised of towns, groups, solid waste districts and alliances in Vermont. VTPSC's mission is to shift Vermont's product waste management system from one focused on government funded and ratepayer financed waste diversion to one that relies on producer responsibility. The intent is to reduce public costs and drive improvements in product design that promotes environmental sustainability.

The MRRMA currently operates under an approved Solid Waste Implementation Plan (SWIP) that is updated every five years. The SWIP requires HHW collection services for small businesses and residents annually. In 2018, a minimum of three events or access to a year-round hazardous waste management facility is required. All towns in the MRRMA have access to two collection events and have an agreement with a permanent facility for additional HHW disposal. In 2019, the number of required events increases to four if there is no access to a permanent facility. Each event must be at least four hours in duration. In addition, year-round collection options must be available for batteries, fluorescent lamps, mercury thermostats, one and twenty pound propane tanks, e-waste, architectural paint and used oil.

Managing hazardous and solid waste in an environmentally friendly, cost effective manner has been a top priority for the MRRMA for more than 22 years. HHW poses a threat to the environment, residents, businesses, sanitation workers, transfer station attendants and wildlife. The MRRMA spends approximately \$30,000 annually for HHW collection services. This figure does not include the monies spent for personnel time or outreach and education to residents and small businesses. The MRRMA spends another approximately \$10,000 on these activities. Approximately forty percent of the MRRMA's annual budget is spent on HHW activities. Outreach and education topics include how and where residents can conveniently, properly and safely dispose of their products; waste reduction strategies; and alternative less toxic options. Environmental Producer Responsibility has been extremely beneficial in managing primary batteries, fluorescent lamps, mercury thermostats and other products, e-waste and architectural paint.

Statewide figures show\$1,580,000 was spent by Towns, Groups, Solid Waste Districts and Alliances in 2016 for HHW collection. We are only reaching a small percentage of Vermonters Statewide: approximately 3.8% of the population took advantage of disposing of their HHW at either a permanent facility or a one-day collection event in 2016. Whether a town is independent, in a group, a district or alliance, HHW collection requires a significant amount of money to implement. The financial burden falls on the resident n the form of an increase in surcharge, a raise in per capita fees, raising property taxes or a combination of actions.

Legislation such as H.560 would assist in relieving some of the financial burden placed on the Solid Waste Management Entities(SWMEs). The MRRMA supports the manufacturer registration and product fees outlined in the bill; however, in it's current form, a heavy burden is placed on the Agency of Natural Resources to oversee and implement the program. A preferred structure would be similar to the paint environmental producer responsibility legislation already enacted by the Vermont Legislature.

Thank you for your consideration of this proposed bill and your past efforts in environmental responsibility legislation.

Sincerely,

## John Malter

John Malter, Administrator, Mad River Resource Management Alliance madriverrma.org