

Testimony
Vermont General Assembly
Senate Committee on Natural Resources and Energy
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S. 285 An Act Relating to Universal Recycling Requirements

Chairman Bray, and Honorable Members of the Senate Committee on Natural Resources and Energy, thank you for the opportunity to appear before you today to provide testimony on Senate Bill 285.

My name is Kim Crosby, I am an Environmental Compliance Manager with Casella Waste Systems, based in Rutland. Casella is one of the largest collection, transfer, recycling and disposal operations providing solid waste and recycling services throughout the Northeast. Casella is a regional leader in the organics business, and has a division of the company dedicated to anaerobic digestion, large scale food waste collection, residuals management and composting. Casella Organics sources and feeds anaerobic digesters in Massachusetts, Maine, Rhode Island and Vermont, and runs one of the largest composting facilities in New England, located in central Maine. Annually, Casella recycles over 400,000 tons of organic materials. Casella also provides food waste collection services in areas of high quality and high quantity, and in general supports and promotes food waste recovery.

Casella is supportive of Senate Bill 285 for multiple reasons. We are in favor of the increase of the food waste generator threshold from 18 to 52 tons per year. The current mandate for the recycling of food waste for a generator creating 18 tons per year (or more) of food waste is not cost effective for Vermont businesses. In addition, a full scale, statewide food waste collection initiative would create an environmental impact that outweighs the benefit of diversion. The 52 tons per year threshold mirrors food waste bans in neighboring states like Massachusetts. That state is hoping that generators creating less than 52 tons per year of food waste will start to divert food waste on a voluntary basis, and that over time the infrastructure in Massachusetts will evolve to encourage more diversion. We agree with that approach for Vermonters. Act 148 mandated a very aggressive time line for the implementation of the recycling of food waste, and many Vermont businesses are not prepared to manage through or pay for this service.

Casella's experience servicing high quality and high quantity food waste generators has revealed that they have already initiated and are managing their own food waste programs. If done correctly, it can be cost effective, and in most cases they have the resources to train their employees to be mindful of sorting food waste. For smaller generators of food waste, below 52 tons, the process becomes cost prohibitive. Small food waste generators do not have the staff to train and properly sort food waste, and cannot afford the cost of additional collection services. Backyard composting is not an option for these small generators. We have estimated that food waste collection services could cost a small business (18 tons per year) about \$3,000 per year.

Let's turn our attention to residential food waste, currently mandated to be collected per Act 148 in 2020. In 2016, Casella conducted a pilot program in South Burlington to determine customer interest, operating costs and customer's willingness to pay for food waste collection service. We targeted 1,100 residential customers in South Burlington offering them free food waste collection services for four months. Out of the 1,100 customers solicited, only 116 customers signed up for the service. After four months, we calculated the monthly cost to continue to provide the service, and contacted the participating residential customers again. 34 customers were willing to pay for continued food waste collection service. Chittenden County is known for its progressive thinking in waste management, recycling and food waste handling. The fact that only three percent of the Chittenden County residents asked to participate in the pilot found value in food waste collection is incredibly telling. We support the removal of mandatory food waste ban at the residential level from Act 148 via the language presented in Senate Bill 285.

It is expensive to run an extra vehicle to exclusively collect food waste – there are NO trucks that collect waste, recycling and food waste all in one, which creates an increase in carbon emissions and fuel consumption. Mandating that waste haulers offer food waste collection services is not realistic. All Vermont customers, whether they be commercial, industrial or residential, struggle with the separation of waste, recycling and food waste from each other. The benefits of mandating food waste collection by haulers is minimal at best – a handful of participating residents in a highly rural state, doing a poor job of sorting out food waste from their garbage and recycling provides no environmental benefit. We believe that haulers should have the right to choose if they want to be in the food waste hauling business or not.

Collecting food waste in our rural state increases vehicle traffic and adds to our carbon footprint. The Coventry Landfill is already equipped to recover renewable energy from disposed organics, with a state-of-the-art landfill gas to energy plant that provides renewable energy to 7,000 homes. 66% of Washington Electric's power source is derived from the Coventry Landfill. Because of the significant investments made by Washington Electric and Casella, Casella secured incentives through the Vermont SPEED Program that allowed Borrego to install 12 acres of solar panels that generate 2.2 megawatts of electricity to the regional grid. In addition to the landfill gas to energy facility and solar panels, Casella is in the process of obtaining approval to install geothermal loops in order to recover the heat that is generated from the decomposition of organic waste. The heat will be used to operate five greenhouses. We have installed the loops and a greenhouse at our landfill in Bethlehem, NH and the project has been a huge success not only for the facility but for the community.

As a final note, Casella supports the ability for waste haulers and transfer stations to charge for recycling. Recycling is not a free service, and depending upon the value of commodities can exceed the cost of waste disposal. Many of the drop-off locations are receiving an abundance of recycling without the trash to cover the cost of processing the recycling.

Thank you for your consideration. I will be happy to answer any questions that the Committee may have in regard to Casella's support of Senate Bill 285.