



Composting Association of Vermont

Reclaiming Organics For Good

April 25, 2017

Senate Natural Resources and Energy Committee

RE: **Proposed Amendments to Act 148**

The Composting Association of Vermont (CAV) urges the Committee to leave Act 148 unchanged.

The following comments support this recommendation.

- Act 148 has a provision to adjust for the availability of processing infrastructure: A business is not required to divert if there is not a composting facility within 20 miles to process the material. The express purpose of this provision was to guarantee material flow as businesses took on the cost of building infrastructure. The proposed amendment to push back compliance for 18TPY businesses would harm facilities that have been developing infrastructure and preparing their customers to meet this mandate. 18TPY generators will also provide critical 'route density' for haulers. The law requires haulers to offer the service. It does not limit what a hauler charges.
- Act 148 as enacted offers flexibility between generator/hauler/processor to support a range of options to transport, repurpose, and process organics. More edible discarded food is coming out of the waste stream than was predicted in the state's initial Systems Analysis of the Impact of Act 148. There is also more material going to livestock, especially laying hens. The result is, composting facilities have capacity they might not have had otherwise.
<http://legislature.vermont.gov/assets/Documents/2014/WorkGroups/Senate%20Natural%20Resources/Bills/S.208/Testimony%20and%20Public%20Comment/S.208~Natalie%20Starr%20and%20Tom%20Sieglar~DSM%20Systems%20Analysis%20of%20the%20Impact%20of%20Act%20148%20on%20Solid%20Waste%20Management%20in%20Vermont~2-25-2014.pdf>
- Two new regional composting facilities (North Hartland, Johnson) are under development.
- Regarding cost concerns, we offer the following data from the Windham Solid Waste Management District (WSWMD) manager, Bob Spencer, (802-257-0272X111 and cc'd)
 - Town of Brattleboro does not yet have good cost data, but believes they are saving money because:
 - ✓ Food scraps/soiled paper/cardboard tip fee at WSWMD is \$50/ton vs. \$101/ton for trash - About 500 tons/year from residents X \$51/ton savings = \$25,500/yr savings.
 - ✓ Residents save by not having to buy \$3 PAYT bags for that 500 tons.
 - Windham County hauler:
 - reduced trash collection cost when they started every other week trash July 1
 - reduced recycling collection costs by going to single stream this July 1
 - tips about 150 tons of yard waste for \$0/ton at WSWMD during 4x/yr special collections.

- Examples of savings for commercial generators:
 - ✓ The three Hanover Coop stores saved so much money after they started diverting edible food for distribution to food insecure residents of Vermont and New Hampshire, they instituted a monthly donation to support that work.
 - ✓ As generators alter their materials management to comply with Act 148, some are adopting new systems/technologies that save them money through purchasing, preparation and sales models. ANR and US EPA are promoting waste reduction.
- Where source separation is more established, organics is picked up weekly; recyclables and trash every other week. There is not necessarily a need for additional trucking miles. This does not imply there aren't exceptions.
- SWMEs are promoting backyard, school, and community composting. These options can often better address contaminants and with a lower carbon footprint. For example, New York City has over 140 community composting sites and 45 drop off locations for residential food scraps. Master Composters volunteer at the Green Markets to ensure material is uncontaminated.
- About landfill gas capture: The USEPA cites landfills at the third largest emitters of GHG, 50%~ methane — a gas that is 28 to 36 times more damaging than CO2, but remains in the atmosphere ~100 years rather than 500 - 1,000 yrs. for CO2. <https://www.epa.gov/lmop/basic-information-about-landfill-gas> Keeping organics out of the landfill is one of the few things all Americans can do to help mitigate near term impact of climate change. It's the reason USEPA is expending significant resources to advance organics waste reduction, food recovery, and composting. <https://www.epa.gov/sustainable-management-food/food-recovery-hierarchy>

A recent evaluation reported in MSW Management magazine, found that “the diversion of food waste is likely to have a neutral or slightly positive impact on LFG (landfill gas) recovery rates. This is due to the fact that mixed waste decomposes more slowly than food waste, and therefore, the LFG generated by its decomposition is more likely to be captured.....”

http://dec.vermont.gov/sites/dec/files/wmp/SolidWaste/Documents/Universal-Recycling/Benefits_of_Redirecting_Food_Scraps_from_Landfills.pdf

- According to the USEPA Americans throw out more food than any other type of waste, accounting for 21 percent of the American waste stream. <https://www.epa.gov/newsreleases/epa-recognizes-new-england-institutions-diverting-food-waste>.

The 2013 ANR Waste Characterization Study estimates an average of 16.7% for Vermont households. <http://dec.vermont.gov/sites/dec/files/wmp/SolidWaste/Documents/finalreportvermontwastecomposition13may2013.pdf> (page 21)

Thank you for considering CAV's comments. I am available to answer questions you may have.

Submitted April 25, 2017, on behalf of the CAV Board.

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