

March 29, 2013

Bryn Oakleaf
State of Vermont Department of Environmental Conservation
Waste Management & Prevention Division
1 National Life Drive, Davis 1
Montpelier VT 05620-3704

Dear Ms. Oakleaf:

Strategic Materials, Inc. (SMI) is pleased to provide comments on the DSM-authored study released on March 12th, *Comparison of System Costs and Materials Recovery Rates: Implementation of Universal Single Stream Recycling With and Without Beverage Container Deposits, Mar. 4, 2013 (DSM Draft Report)*

SMI is a nationally-recognized glass recycling company, with facilities located across North America. We are the largest glass recycler and manufacturer of glass cullet in North America. SMI's products are used primarily by the glass container, fiberglass, and specialty glass industries. Currently SMI recycles a large portion of the glass that comes from Vermont. This includes glass that comes from Vermont's single-stream recycling facilities.

SMI would like to bring to your attention our concern related to the cleanliness of material received from the state's single-stream recycling plants compared to glass received through the state's container deposit system. In the report, the amount of non-glass residue resulting from single-stream recycling operations is stated as being 6%. We do not find this to be accurate. SMI performs an inbound analysis of every shipment of glass we receive, including from facilities in Vermont. Our analysis of this glass taken over time demonstrates that the amount of non-glass residue to be 39% on average, though at times the material has been as high as 45% residue. The amount of residue found in single-stream glass is significantly higher than residue found in container deposit material where non-glass residue is in the 6-8% range.

It is SMI's recommendation that an adjustment be made to the report to accurately reflect the reality of material losses through single-stream recycling. Additionally, the cost of single-stream recycling in Vermont will need to be adjusted to reflect the increased cost of landfilling single-stream, non-glass residues which cannot be recycled. To further illustrate SMI's concern, please refer to **Exhibit-A**, included with this letter, where SMI provides pictures of glass collected through the state's single-stream system and glass received through a container deposit program.

Please do not hesitate to reach out to me if I can be of any further assistance regarding glass recycling or recycling systems.

Best Regards

David T. Hudson, Strategic Materials, Inc.

Strategic Materials, Inc. – Exhibit-A

Photograph of Glass Received Through Single-Stream Recycling:



Photograph of Glass Received Through a Beverage Container Deposit Recycling System:

