



February 15, 2022

**TESTIMONY OF CHRISTOPHER J. WAGNER**

Director of Compliance and Regulatory Affairs, AmeriGas Propane L.P.

**BEFORE THE VERMONT COMMITTEE ON NATURAL RESOURCES, FISH, AND WILDLIFE**

**Concerning HB 115 - A Bill Concerning Conservation and development; hazardous waste; consumer products; household products containing hazardous substances**

AmeriGas is honored to be granted the opportunity to offer its comments to the Vermont Committee on Natural Resources, Fish, and Wildlife, regarding HB 115 - A Bill Concerning Conservation and development; hazardous waste; consumer products; household products containing hazardous substances. We respectfully request that the committee amend § 7181. Definitions 4 (A)(v) to read “The product is a non-refillable propane container.”

AmeriGas is the largest propane retailer in the United States, serving over 1.5 million customers in all fifty states from approximately 1,800 propane distribution locations. AmeriGas has 650 area offices with approximately 6,500 employees nationwide. In Vermont, AmeriGas serves approximately 20,000 customers from 12 district offices, by approximately 60 employees.

In addition to our domestic propane delivery operations, AmeriGas also operates one of the nation’s largest refillable 20-pound propane cylinder exchange programs in the United States. These are the types of tanks that are commonly used on barbecue grills in backyards across the state and can be traded for a new tank at most big box, hardware, grocery, and convenience stores in Vermont. Through this program AmeriGas processes millions of 20-pound cylinders annually. This process involves inspecting, cleaning, repainting, requalification for continued use, replacement of valves, evacuating propane when needed, and properly recycling cylinders no longer suitable for continued service all at no additional cost to the consumer.

To provide a better scope of this work, over the past 12 months AmeriGas has, decontaminated more than 14 million cylinders, painted more than 3 million cylinders, performed DOT requalifications on over 1.7 million cylinders, evacuated residual propane from more than 1.1 million cylinders, replaced valves in over 700,000 cylinders and scrapped or disposed of over  $\frac{3}{4}$  of a million cylinders nationwide, as part of our existing exchange program.

The 20-pound cylinder exchange programs incentivize consumers to exchange any 20-pound propane cylinder, regardless of condition, place of purchase, or suitability for continued service, for a recently inspected, refurbished or new cylinder at a significant discount over purchasing a full cylinder, outright. In fact, our business model is reliant on consumers bringing their empty or near empty containers back to a designated exchange location to keep the process moving. Consumers may return one or multiple cylinders, often in less than refillable condition and pick

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up a single or multiple replacement barbecue tanks in exchange. Further, many governmental entities actively utilize our cylinder exchange program to manage their cylinder needs or excesses. The propane tank exchange solution protects consumers from increased costs as inflation and steel shortages grip the market by reinjecting useable containers into the production stream or increasing the availability of recycled steel to the manufacturers.

AmeriGas willingly accepts 20-pound propane cylinders in any condition, at any one of our 115 AmeriGas Propane Exchange locations within the State of Vermont. This is part of the normal established business process in effect today. Last year AmeriGas facilitated over 26,000 such exchanges within the State of Vermont. AmeriGas does not discriminate against any cylinder owner, manufacturer, or entity from participating in or utilizing our grill tank exchange system. This includes dropping off additional or unwanted cylinders as needed. AmeriGas has also demonstrated its continued commitment to product stewardship by collecting and recovering cylinder directly from governmental entities, waste transfer yards, and emergency service providers upon request. The most recent example of this partnership was with the US Environmental Protection Agency (EPA) during a Superfund site remediation where roughly 1500 20-pound propane cylinders were identified during the initial site characterization and required removal. AmeriGas offered this partnership to the EPA even though no cylinders identified on the site were attributed to AmeriGas operations.

AmeriGas, in partnership with the Propane Gas Association of New England (PGANE) and the Propane Education Research Council (PERC), have developed [webpages](#) specifically for the purpose of supplying guidance for consumers on disposal solutions available for the recycling of unwanted 20# grill tanks. AmeriGas offers partnership to any entity or jurisdiction in the State of Vermont to reference the AmeriGas [grill tank information](#) or [location finder](#) pages on their website to provide residents with guidance on dealing with unwanted propane barbecue tanks.

It is our respectful request based on the established industry cylinder exchange program, longevity of cylinder service life, inherent value to the consumer in participating in an exchange program, and ease of cylinder returns based on the current network of providers that the committee amend § 7181. Definitions 4 (A)(v) to read “The product is a non-refillable propane container.”

Thank you for the opportunity to provide this written testimony to the Committee on Natural Resources, Fish, and Wildlife, regarding HB 115.