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Dear Chair Sheldon and Members of the Vermont House Committee on Environment,

I am writing on behalf of the Chittenden Solid Waste District, CSWD regarding proposed amendments related to fire extinguishers being considered in H.632, Section 21.

Solid Waste Management Entities, SWMEs collect and manage thousands of rechargeable and single-use fire extinguishers at our household hazardous waste collection facilities and events every year. Fire extinguishers are a difficult material for municipalities and SWMEs to manage and if we didn't accept them, these pressurized cylinders would end up in the landfill, material recycling facilities or scrap metal collection containers, endangering operators and equipment at these facilities.

Collected extinguishers are either shipped from events by the hazardous waste hauler to be disposed of at a significant cost (one SWME reported \$160/each), or managed by staff at HHW facilities by physically discharging the dry chemical, capturing it in a drum for disposal and recycling the cylinder as scrap metal. Collecting and discharging fire extinguishers is labor intensive and dangerous.

We request that any language under consideration that would exempt fire extinguishers from the household hazardous waste extended producer responsibility law, contain the following:

- An alternative program that provides collection and proper management of all fire extinguishers collected by SWMEs at no cost to the SWME.
- A requirement that service to SWMEs to collect the fire extinguishers they accumulate occurs at a frequency that keeps the number of extinguishers within the storage capacity of the facility.
- A requirement that all brands and all types be accepted by the alternative collection program.
- A requirement that the fire extinguishers that are collected be recycled.
- A prohibition on landfill disposal of any fire extinguisher.

Thank you for your time and consideration.

Sincerely,
Jen Holliday

Director of Public Policy and Communications