



H.319; waste related changes and HHW

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Sec. 1; Battery EPR Study

- Act 152 of 2024 required a study of EV batteries and embedded batteries.
- The States of IL and WA are doing the same study with a reporting date of 7/1/27.
- This has the stewardship organization do the report and aligns the date with other states.

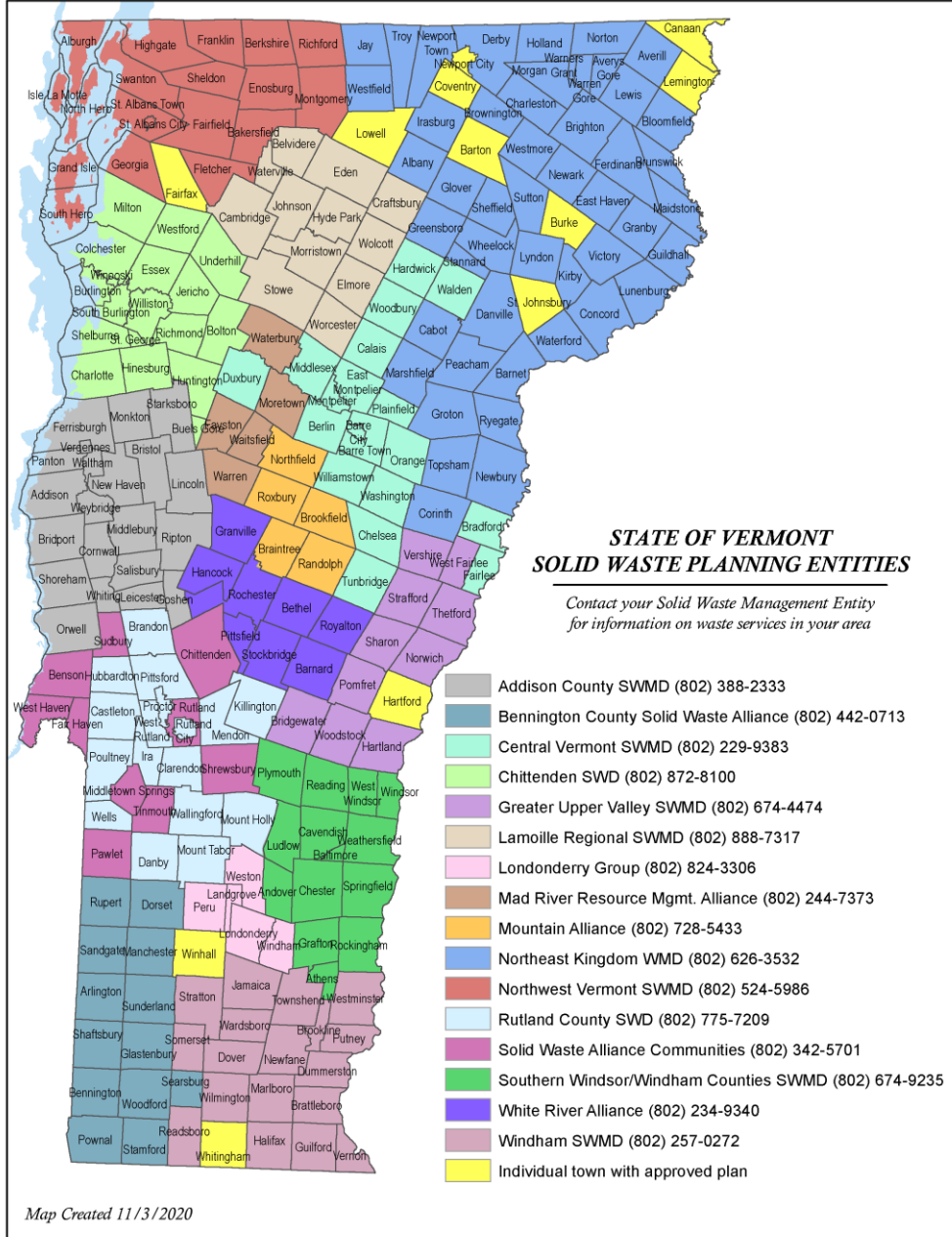
Sec. 2; UST “red tag”

- ANR can prohibit delivery of fuel to a tank that is not in compliance with ANR rules or its permit.
- This change also allows the ANR to prohibit delivery when the tank does not have a permit or when the violation might result in a release.

Secs. 3 – 9; HHW EPR

Overview of changes.

- HHW manufacturers required to register;
- HHW program delayed 1 year;
- Partial initial implementation – SWMEs get funding but other program elements delayed;
- ANR can create a program if no Stewardship Organization formed; and
- SWMEs can request reduced collection events during the 1-year delay.



Some Vermont Waste History

- 1987 Act 78 established sanitary landfills and formation of municipal Solid Waste Management Districts
- Municipal HHW collection has been required for over 30 years.

What is HHW?

Household Hazardous Waste (HHW) is “Hazardous Waste” that is exempt from Hazardous Waste regulation due to who generated it.

NOTE: it is just as toxic/hazardous, and

Is the most toxic part of the solid waste stream.

HHW Products are commonly labeled “caution, toxic, danger, hazard, warning, poisonous, reactive, corrosive, or flammable” and can include:

- Aerosols
- Automotive products
- Flammable degreasers
- Flammable lubricants
- Flammable adhesives
- Hazardous cleaners
- Kerosene
- Lighter fluid
- Mineral Spirits
- Mercury products
- Paint thinners
- Paint stripper/remover
- Pesticides
- Pool and hot tub chemicals
- Rust remover
- Tar remover
- Turpentine



What the VT HHW EPR Law Covers “covered household hazardous products”

- That are defined as Hazardous Wastes under VT’s HWM Rules (characteristic or listed wastes)
- Gas cylinders

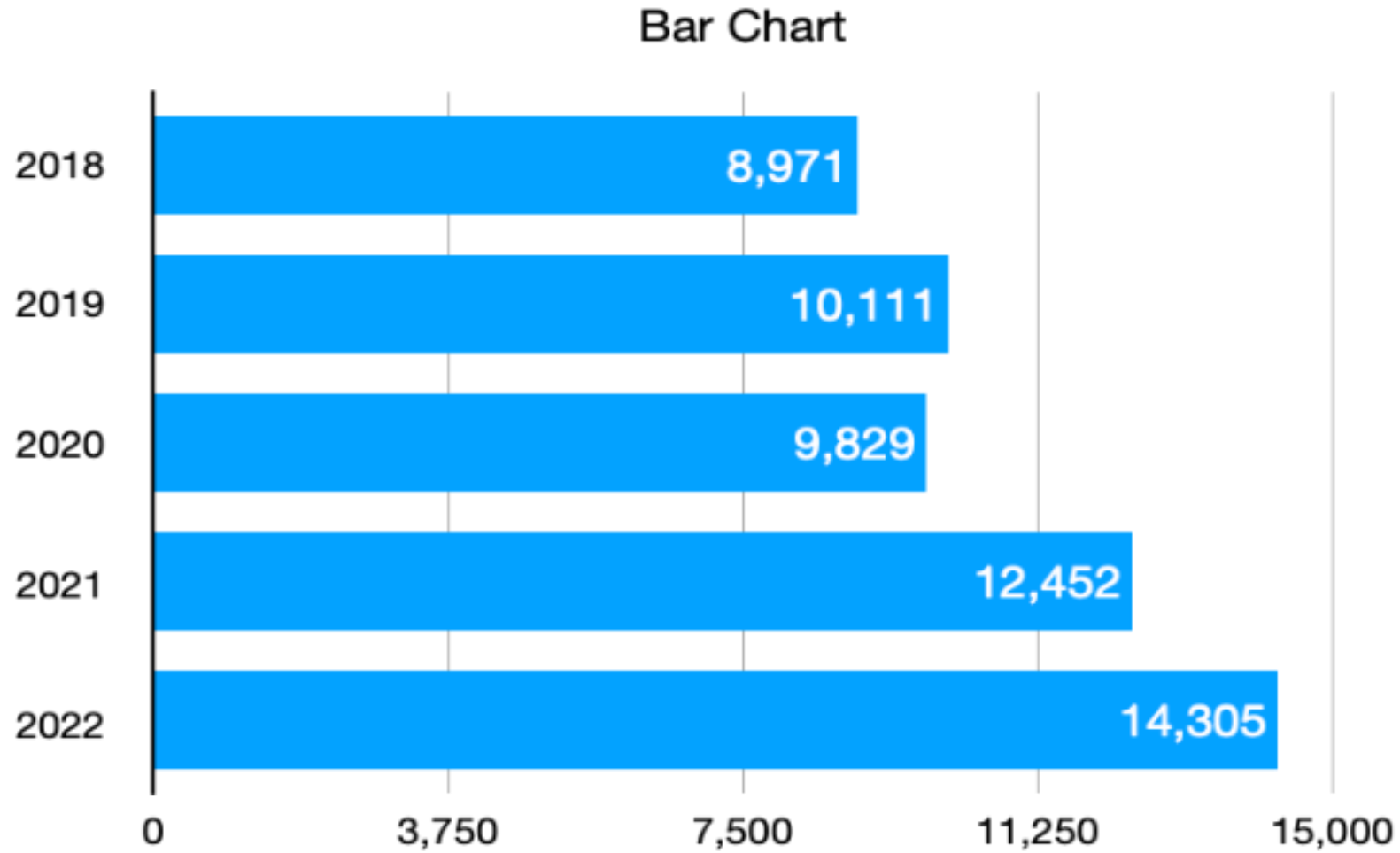
EXEMPTS Existing Product Stewardship, Advanced Consumer Fee, and EPR Programs

- Primary and rechargeable batteries
- Mercury Lamps
- Mercury Thermostats
- Paint covered in the EPR Program
- Electronics covered in the EPR Program
- Pesticides A, B, & C registered with VT Agency of Agriculture
- Pharmaceutical drugs
- Citronella candles, flea/tick collars, and health and beauty products unless ANR designates as a hazardous material.

How the Law Passed...

- Most toxic form of solid waste with a 30+ year history of municipal collection
- VT has existing HHW collection facilities and events
- Costs increased as much as 50% for collection events, \$100-\$400 per carload.
Shrinking pool of service providers & supply chain issues
- Municipalities faced tough decisions of whether to charge people more to do the right thing, leading to more disposal in trash or worse into the environment or endangering people in their homes and properties.
- Legislative testimony discussed that the law may support less-toxic alternatives

Londonderry Solid Waste Group's HHW Costs for June Events



What the Law Does

- A. Contains Stop Sale
- B. Only allows one Collection Plan
- C. Requires free statewide collection from covered entities
- D. Requires statewide convenient collection with all municipal costs covered for collection, processing, and end-of-life management including facility costs, equipment, labor, supplies, maintenance, event costs, and contractor costs.
- E. Requires public education and outreach, including source reduction, and 2 public awareness surveys
- F. Method of disposition following reduce, reuse, recycle, dispose hierarchy.
- G. Requires collection performance goal, initially 5% of households participate per year.
- H. Includes a disposal ban on “covered household hazardous product”

Changes in H. 319

- Before November 1, 2025 a HHW manufacturer is required to register with the stewardship organization. If they fail to register they are subject to enforcement.
- Stewardship organization is required to register, in a simplified form, with the ANR on or before July 1, 2025.
- Delays initial collection plan one year till July 1, 2026.
- Phases in implementation of the program with the initial plan funding the program in place in calendar year 2024 with any collection events or facilities approved by the Secretary added. This initial program would be in place for not more than 3 years.
- Clarifies that stewardship organizations can charge members reasonable fees to administer the program.
- Creates a plan backstop. If no stewardship organization is formed or a plan is not approved the Secretary can adopt a plan and charge the manufacturers for its implementation, the Agency oversight costs, and an additional 10% of the plan's total cost for pollution prevention and hazardous waste reduction.

Thank you!

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