See attached our response for the CCSMM Public Engagement Questions. Please confirm receipt.

Thanks,

Gisele Papadakis, Director of Marketing
October 15, 2020

Connecticut Coalition for Sustainable Materials Management (CCSMM)
DEEP Recycling Program

Subject: Response to Public Engagement Questions

Dear Madam or Sir:

MSW Consultants is submitting this in response to CCSMM’s recent Request for Comment and Solutions. MSW Consultants is a management consulting company specializing in the municipal waste management industry. We have extensive experience serving local governments and solid waste authorities in Connecticut and the Northeast region, and have followed the evolution and challenges faced by MIRA for decades. We appreciate CCSMM’s interest at uncovering solutions to optimize sustainable materials management across the state.

We are submitting responses to the following question for consideration by CTSMM:

1. Are there any model programs, best practices, or innovative concepts that the Coalition should consider, that could provide a scalable solution in any of the Focus Areas, listed above?

MSW Consultants has developed two proven solutions that help municipalities and Material Recovery Facilities (MRFs) measure the value and contamination of their recyclables in a clear and transparent way, and provide direct feedback to residents about proper recycling set-out behaviors. We also support municipalities in modifying their ordinances, policies and rate structures to maximize the beneficial impact of these services. Attached to this letter, please find information about the following two services, which could be readily pilot tested to demonstrate their utility and effectiveness:

- **Grading and Purity (GAP) System:** The GAP System is a cost-effective method for performing routine audits of inbound single stream and dual stream recyclables at MRFs. The system is currently in use in a state-wide study in Michigan to evaluate strategies for reducing contamination, where it greatly reduces the cost to collect this critical information. This system directly addresses CTSMM’s focus area of “4.c. Measures to improve the quality of recycled materials.” In practice, the GAP System would also apply to mixed organics composition and contamination monitoring, if needed. A GAP System brochure is included in Attachment A to this letter.

- **Recycling Container Monitoring Service:** MSW Consultants has been working with a large county in Florida since November 2019 to audit recycling carts on the scheduled collection day. To date, we have directly audited over 45,000 households. Recycling container monitoring programs, which are being aggressively funded by The Recycling Partnership, have been found to be highly effective at driving two critical outcomes in
curbside recycling programs: (a) they correct the behavior of most households to set out clean material, and (b) they definitively identify the households that, for whatever reason, will not behave properly and therefore should have recycling privileges removed for the good of the program. This system directly addresses CTSMM’s focus areas 4.c. and 4.d. Our brochure on recycling container monitoring is included in Attachment B to this letter.

MSW Consultants also has developed the industry’s most rigorous method for evaluating the state-wide market for organics diversion (Focus Area 2). Our market research tools and methods identify suppliers of food scraps and other organic materials, and also inventory the composting and digestion facilities that could currently or in the future be upgraded to accept organics for processing. We would welcome the opportunity to assess the market in Connecticut to connect suppliers and processors to validate a long-term business plan.

Finally, MSW Consultants is a leading provider of solid waste utility cost-of-service and rate analyses that link to the operational dynamics of the collection system and therefore help municipal decision makers to understand the advantages and disadvantages of various Unit-Based Pricing rate structures (Focus Area 1). In Connecticut, we have observed many dynamics that have impaired the effectiveness of these programs, and opportunities abound for Unit-Based Pricing program optimization.

MSW Consultants would welcome a discussion with CTSMM about these solutions. Further, we would be amenable to presenting to the group on one or more of the above topics. Candidly, Connecticut’s municipal governance structure featuring 269 independent cities and towns, combined with a lack of regulatory assertiveness from the state government to establish a sustainable, integrated, large-scale waste management system, will continue to undermine the state’s ability to migrate to a healthy, cost-effective, large-scale materials management system. However, the services described herein would at least provide defensible metrics that are critical to recycling and organics program improvement, to benefit and inform DEEP, the cities and towns, and private sector service providers and investors.

Please do not hesitate to contact me at (407) 380-8951 or jculbertson@mswconsultants.com, if you have any questions.

Sincerely,

MSW CONSULTANTS

John Culbertson
Vice President

Attachments
ATTACHMENTS
BROCHURES

- GAP System Brochure
- Cart Monitoring Brochure
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The GAP System by WasteInsight™ helps local governments, suppliers, and processors transparently, consistently, and accurately measure single stream contamination and bale quality using ASTM International measurement methods.
Introducing the **GAP System**
by WasteInsight™

The **Grading and Purity (GAP) System** is a customized material composition measurement and data tracking system that helps generators, processors, and end users at every step of the material recovery cycle to measure and quantify contamination levels, material purity, and overall composition specifications.

The GAP System provides your MRF or manufacturing facility with:

- Customized sampling and sorting protocols to routinely measure the purity and product yield for representative samples of all plant inputs and outputs — including recycled material deliveries, bales, core samples, residuals, and reject streams
- The specific equipment and supplies — including sorting platform, bins, scales, and electronic data entry — needed to perform regular composition testing and accumulate data
- Customized training to implement a transparent, consistent monitoring program that employs ASTM International standards for material composition testing and measurement
- Access to WasteInsight™, a cloud-based data management dashboard that lets you monitor the contamination rate, material purity, and other composition by feedstock, by sorted commodity, by supplier, by date range, and by facility (for entities with multiple processing or manufacturing plants)

This composition monitoring solution is based on over two decades of experience performing waste and recycling characterization studies, and subsequently managing the data to inform stakeholders “what’s in your waste.” With the data filtering and analytical tools in WasteInsight™, you have access to detailed reports and queries about the composition and contamination level of every material stream in your plant.

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**The GAP System - How it Works**

- **Specified Equipment** for sorting, weighing, and data recording
- **Cloud Based Data Management**

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Composition, Market Value & Contamination Reports
for You / for Your Supplier

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800.679.9220
wasteinsight.net
GAP SYSTEM PRICING HAS THREE COMPONENTS:

- **A Program Initiation Fee**, which covers:
  - An initial site visit so our experts can understand your material flow, inbound/outbound material streams, and specifications testing regimen
  - The development of one or more customized GAP testing regimens based on the site visit findings and your material composition specifications
  - All equipment and supplies needed to begin grading your material quality
  - Access to *Wastelnsight™* to record and upload composition data into our online platform
  - On-site training provided by our material characterization experts to get your team properly using the GAP System

- **Usage Fees**
  - There is a quarterly subscription charge to gain full access to the data management and analytics platform
  - Data uploads for ongoing audits may be purchased in bundles of 50, 100, 500, or you may choose the unlimited upload plan

- **Supplemental Training and Independent Audits:**
  *The Wastelnsight™ Team is always available to support your usage of the GAP System, by supplying:*
  - Additional training and/or enhancement to your customized GAP testing protocols
  - Independent material composition audits managed by our professional staff
  - Supplier education and GAP System onboarding
Minimizing Contamination and Maximizing Yields of Targeted Recyclables has Never been more Important in the Recycling Industry!

DOES YOUR FACILITY:
- Process single stream or commingled recyclables?
- Bale mixed or sorted materials for shipment to market?
- Process bales from recycled material suppliers for re-manufacture?

WOULD BETTER MONITORING HELP YOU?
For ongoing monitoring of your material stream, the GAP System provides highly accurate, defensible measurements without the cost of third party material characterization consultants! You realize these savings because the GAP System allows you to leverage your trained labor force to accumulate measurements.

Do you Need an Independent Composition Audit?
The WasteInsight™ team has been providing independent material stream auditing services for local governments and processors for two decades. Let us design and perform a technically rigorous, transparent methodology that can be trusted by both parties to be accurate for contractual monitoring.

ABOUT THE GAP SYSTEM
The Grading and Purity (GAP) Program is the recycling Industry’s most innovative and effective program to provide you with your upstream and downstream material supply partners with the ability to compile and analyze the data needed to improve material quality at every step of the recycling process.

ABOUT WASTEINSIGHT
WasteInsight™ is an uniquely informative market intelligence service that helps waste generators, haulers, processors, facility developers, manufacturers, trade associations, and state and local governments accumulate, track and analyze selected hard-to-find, technically complex, and market-critical data to enhance their waste management performance. WasteInsight™ is an ever-expanding work-in-progress brought to you by MSW Consultants.

Call 800.679.9220 x 11 for pricing and GAP System inquiries or visit wasteinsight.net
CART MONITORING will drive SUSTAINABLE RECYCLING PROGRAMS

MSW Consultants is a leading provider of professional, efficient, technology-driven recycling cart monitoring programs for cities, counties, and solid waste authorities across the U.S. Let us help your community establish a program that fits your recycling program needs as well as your solid waste department budget.

Curbside recycling programs are, first and foremost, providers of a specialized feedstock for U.S. manufacturers of products and packaging in a circular economy.

If you are not closely managing the cleanliness and composition of your curbside recyclables, you are needlessly increasing your system cost, losing valuable recyclables, and missing an opportunity to maximize sustainability in your community.
“Successful execution of The Recycling Partnership’s Feet on the Street cart tagging program brought curbside feedback to 35,000 households in Florida and reduced the rejection rate from almost 80% to less than 20%. That’s over $300,000 in savings on an annual basis.”
—Alita Kane, Community Program Coordinator
The Recycling Partnership
(former Recycling Coordinator for the City of Tampa)