



Bristol Resource Recovery Facility Operating Committee

27 West Main Street
New Britain, CT 06051
www.brrfoc.org

(860) 585-0419

April 13, 2016

Mr. Lee Sawyer
Department of Energy and Environmental Protection,
79 Elm Street
Hartford, CT 06106.
March 15, 2016

Thanks to all at the Department of Energy and Environmental Protection for sharing your vision of where we are presently with respect to materials management, and suggested actions for the near term moving towards the 60% recycling goal codified in Public Act 14-94. It has been a pleasure hearing your thoughtful comments at the Legislature's Environment Committee, the Solid Waste Advisory Committee, and CBI's e² Committee. My comments presented today reflect perspectives on how revisions to the Solid Waste Management Plan will impact municipalities, and particularly those which rely upon waste to energy for disposal of materials which are not recovered through recycling or product stewardship efforts. The Bristol Facility Policy Board, successor organization to the Bristol Resource Recovery Facility Operating Committee is comprised of fourteen cities and towns, including Berlin, Branford, Bristol, Hartland, New Britain, Plainville, Plymouth, Prospect, Seymour, Southington, Warren, Washington and Wolcott. These towns have collectively managed waste through contractual arrangements with Covanta Bristol, Inc. dating back to the mid 1980's. Most of these same communities also belonged to the Tunxis Recycling Operating Committee, which was awarded grant funds in 1990 by the Department to initiate a regional program for developing an Intermediate Processing Center (materials recovery facility, or "MRF"), and curbside collection of residential paper products and recyclable containers.

Of utmost importance to these cities and towns, **Objective I** in the *CMMS Action Plan* represents DEEP's planned oversight of municipal recycling efforts, and falls squarely in the unfunded mandate category:

Using the authority of the Commissioner to issue orders..., DEEP will enforce minimum performance standards for local systems... municipalities are responsible to make progress towards the state's 60 percent diversion goal, which this Plan estimates to require an average recycling rate of 45 percent...Accordingly, this action focuses on bringing all municipal systems into consistency with the 2000 target of 25 percent recycling by 2018 and 45 percent recycling by 2024.

DEEP has not defined "recycling rate," nor does the CMMS provide instructions on how "percent recycling" will be determined. In my conversations with DEEP staff, Department officials readily concede there are major gaps in the data which make calculating a recycling rate strictly a numbers game, and highly speculative. Misguided emphasis on uncertain recycling rates may obligate cities and towns to participate in a series of steps to "demonstrate to DEEP's satisfaction that it [a municipality] has achieved a recycling rate greater than 25 percent."

Objective I includes prescriptive steps for municipalities and the Department:

1. *If DEEP determines that a municipality is making insufficient progress in implementing a recycling program that meets the state's goal, it may issue a notice of deficiency.*
2. *Within 30 days, the municipality may provide information to DEEP about impediments to its progress in meeting the goal.*
3. *After considering this information, DEEP may determine whether deficiencies still exist. If such a determination is made, the municipality will be sent notice and will have 90 days to take remedial actions.*
4. *If DEEP determines that the municipal recycling system remains deficient after the 90 day period, it may hold a hearing and issue an order to require additional remedial steps to be taken.*

Evidence of "sufficient progress" in implementing a recycling program to meet the recycling goal is proposed:

The municipality demonstrates to DEEP's satisfaction that it has achieved a recycling rate greater than 25 percent...

Otherwise, demonstration of "sufficient progress" may be achieved if:

The municipality has implemented, or is in the process of implementing, unit-based pricing consistent with best practices for curbside MSW collection and transfer stations, as applicable. A guidance document with model ordinances and standards for pricing differentials will be provided by DEEP on or before October 1, 2016.

CMMS prescribes that for "municipal programs determined to be deficient, **remedies will be determined based on the nature of the deficiency**" [emphasis added]. These steps are clearly punitive. Urban areas with a high concentration of multi-family dwellings will be disadvantaged in this process due to the inherent challenges encountered in these settings. Rural areas may report arbitrarily low recycling rates without taking into account leaves and brush which residents compost in adjacent woods. DEEP proposes a burdensome series of resource-intensive steps for "deficient" municipal programs. No mention is made of rewarding communities which excel in developing innovative strategies and advanced capture rates. Nor is there reason to focus on the performance of any individual city or town, when better results may be achieved at lower cost by examining generation and recovery by sector, not by municipality. DEEP should retract its proposals with respect to municipalities and targeted recycling rates, which are not accurately measurable, and the strategy contemplated in the plan won't work without funding, education and outreach.

Thank you for considering these initial comments, and I look forward to providing a more detailed response by April 22.

Sincerely,

Mark H. Bobman

Mark H. Bobman
Executive Director



April 22, 2016

Lee Sawyer
Project Manager
Bureau of Materials Management & Compliance Assistance
State Department of Energy & Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Re: Draft Comprehensive Materials Management Strategy

Dear Lee:

Thank you for the opportunity to comment on the DEEP's draft Comprehensive Materials Management Strategy (CMMS). We appreciate your efforts to reach out to municipal organizations to discuss the draft plan and obtain input.

Connecticut's smaller communities support efforts to encourage residents and businesses to recycle and reduce waste. We are concerned, however, that the target goal of 60% diversion of materials from disposal is too aggressive given 1) the limited value of recycling commodities, 2) the need for new, emerging technologies to achieve the goal, and 3) the scarce resources available at the local level to implement measures needed to achieve the goal.

Limited Value of Recycling Commodities

The limited value of recycling commodities results in additional disposal costs for municipalities, undermining efforts to support recycling. DEEP should outline steps in the plan that it will take to help develop and permit new uses for recycled materials in Connecticut. Although the plan references the recycling of construction and demolition waste, it does not outline specific recommendations regarding how these materials will be repurposed or disposed of in a responsible manner.

Reliance on New & Emerging Technologies

Achieving the 60% diversion goal in the plan is reliant on new and emerging technologies that are not yet in place. It is unfair to include an aggressive goal of this nature in the plan until such technologies are available.

Moreover, a long-term strategy is needed to ensure that a reliable energy stream is identified that will support the continuation of waste disposal operations in Connecticut until other management technologies are implemented. Unfortunately, due to the decline of natural gas prices, trash burning plants have seen a significant reduction in the price that they could obtain for power generated at the plants. Although the facility has implemented effective measures to reduce costs and mitigate the need for steep increases in tipping fees, a reliable revenue stream is needed to support the continuation of waste disposal operations in Connecticut. Otherwise, plants may be unable to continue operations, forcing towns to pursue out-of-state landfill alternatives, which may bear serious environmental implications.



COST supports efforts to grant trash-to-energy facilities a Renewable Energy Credit to provide a reliable revenue stream which will support the continuation of waste disposal operations in Connecticut until other management technologies are fully implemented.

Product Stewardship

Towns incur significant costs in assisting residents in disposing of certain products. Product stewardship programs have been beneficial in providing a mechanism to support the responsible disposal of electronics, paint and mattresses while reducing municipal costs associated with their collection and disposal. This benefits towns, taxpayers and the environment. COST supports efforts to expand stewardship programs to include other products.

Scarce Resources Available at the Local Level

The state is facing unprecedented fiscal challenges. Efforts to address the state's almost billion dollar deficit for FY 17 are expected to result in significant cuts to municipal aid, disrupting the delivery of critical services, such as education and public safety, or forcing increases on already overburdened property taxpayers.

The draft CMMS plan will require considerable staff time to begin to achieve the goals outlined in the plan. Connecticut's municipalities, particularly the smaller municipalities, simply do not have the resources to implement yet another costly program without any financial assistance from the state.

Need for a More Realistic Goal

Given DEEP's continued staffing limitations, which will only worsen given the budget deficit, DEEP will not have the staff needed to support and assist municipalities in achieving the requirements of the CMMS plan. Moreover, municipalities that fail to meet the goals of the plan may be faced with fines or enforcement orders that may impose hardships on local governments and taxpayers.

COST urges DEEP to develop a more realistic plan and timeframe for implementing its materials management strategy which recognizes the budgetary and staffing limitations of the agency and municipalities, the limited value of recycling commodities, and the need for new technologies to begin to achieve the 60% goal. Failure to address the limitations facing the state and municipalities in achieving the goals of the plan essentially sets towns up for failure and enforcement penalties.

We would be pleased to continue to work with DEEP to develop a plan that encourages municipalities to support efforts to increase recycling, promote product stewardship and reduce the amount of products entering the waste stream.

COST is an advocacy organization committed to giving small towns a strong voice in the legislative process. Its members are Connecticut towns with populations of less than 30,000. COST champions the major policy needs and concerns of Connecticut's suburban and rural towns.



TOWN OF ENFIELD

April 12, 2016

Mr. Lee Sawyer, Hearing Officer
Connecticut Department of Energy and Environmental Protection
Bureau of Waste Engineering and Enforcement Division
79 Elm Street
Hartford, CT 06106-5127

Dear Mr. Sawyer:

The Town of Enfield is hereby submitting comments on the proposed Comprehensive Materials Management Strategy (CMMS). CT DEEP has made significant strides since the last Solid Waste Management Plan proposal almost ten years ago. In particular, we feel the proposed CMMS correctly emphasizes the following components if the state is going to meet the diversion goal of 60% by 2024 through source reduction, recycling and new technologies:

- Important role of product stewardship initiatives in increasing diversion, reducing cost to municipalities and removing toxic materials from the waste stream;
- State's role in providing assistance (financial and otherwise) to local government with enforcement and public education;
- Using disposal numbers as the performance metric (as opposed to recycling %).
- Conducting regular waste characterization studies and using the data to adjust the plan;
- Crediting other recycling activities, such as metals recycled at resource recovery facilities, when determining performance.

There are a number of initiatives which are not included in the current draft which we feel should be included:

1. Consider funding regional recycling coordinators, similar to what was done in the early 1990s when CT's recycling law became effective. Simply put, these dedicated positions were essential to getting the programs going. A similar dedicated effort is now needed to get to the next level. Local government does not have the resources to fund these important positions dedicated to diversion and recycling.
2. The CMMS does not discuss the location of local and regional transfer stations and their ability to be used more efficiently to reduce truck traffic. Since CT's patchwork of programs was created in the 1980s, refuse and recycling trucks have been passing each other on the highway going to technologically equal RRFs or MRFs. Now that all those long term contracts entered into the 1980s have expired, we have a historic opportunity to re-calibrate the transportation network and reduce greenhouse gas emissions, improve highway safety and show consistency with sustainability initiatives.

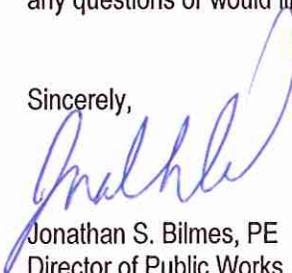
Town of Enfield
Department of Public Works
40 Moody Road
Enfield, Connecticut 06082

Telephone (860) 763-7599
Fax (860) 272-1143
www.enfield-ct.gov/dpw

3. We would like to see the CMMS focus on diversion in the commercial and industrial sector, especially small businesses. Local government does not have control over this sector's waste disposal and recycling efforts. For the state to be successful reaching its diversion goal, much more needs to be done here.
4. There are too few options for disposal of catch basin cleanings and street sweepings. We hope the CMMS will address this lack of disposal capacity.
5. By last count, there are more than 20 towns/cities in the state with municipal employees collecting refuse and/or recycling. These 20 municipalities include many of the largest cities, including Bridgeport, Hartford, Waterbury, Stamford, New Haven, North Haven, Norwalk, Vernon, Bristol, Enfield, and East Hartford that represent almost half the state's population! There are unique challenges that these communities face as well as significant opportunities. We would like the CMMS to acknowledge that these 20 towns/cities are essential to the state achieving its diversion goal. Further, that the CT DEEP will facilitate a working group of towns/cities with municipal collection so we can share best practices and efficiencies.

The Town of Enfield appreciates the opportunity to comment on the draft CMMS. We look forward to working with CT DEEP and all stakeholders to help the State of Connecticut achieve the 60% diversion rate by 2024. If you have any questions or would like additional information, please do not hesitate to contact me.

Sincerely,



Jonathan S. Bilmes, PE
Director of Public Works
Town of Enfield
820 Enfield St
Enfield, CT 06082
860-272-1140
jbilmes@enfield.org

CC: Lee Erdmann, Town Manager
Enfield Town Council



Old Town Hall
162 Whisconier Road
Brookfield, CT 06804

203.775.4539
203.617.4727
info@hrta.org

r e d u c e | r e u s e | r e c y c l e

Housatonic Resources Recovery Authority Comments on the Draft Comprehensive Materials Management Strategy 2016 Connecticut Solid Waste Management Plan

April 13, 2016

Commissioner Klee, Deputy Commissioner Sullivan and solid waste professionals from the Connecticut Department of Energy and Environmental Protection. Thank you for the opportunity to submit comments on the Draft Comprehensive Materials Management Strategy (CMMS). Thank you as well to Lee Sawyer who has met with the HRRA and others in our region on multiple occasions over the past year to discuss the CMMS and listen to our input.

I am Jen Iannucci, Director, representing the Housatonic Resources Recovery Authority (HRRA), a regional, municipal, solid waste and recycling management organization for the eleven municipalities of Bethel, Bridgewater, Brookfield, Danbury, Kent, New Fairfield, New Milford, Newtown, Redding, Ridgefield and Sherman, located in western Connecticut on the New York border, with a population of 225,000 residents. This testimony was approved by the Chief Elected Officials of all our member municipalities and is submitted on their behalf as well as that of HRRA.

By way of background, HRRA was created under [CGS 7-273aa-7-273oo](#) as a regional resource recovery authority in 1986 when landfills in the region were nearing capacity and CT DEP was not issuing permits for new landfills or expansions. The Authority is funded entirely by a \$1/T program fee added to the regional MSW tip fee and recycling rebates which are currently \$5/T. The solid waste collection system in the region is 100% private subscription service for both residential and commercial curbside collection with more than 55 different collection companies registered with municipalities in the region. The Authority has a contract with Wheelabrator Environmental Systems, Inc. for the disposal of MSW generated within the region in Bridgeport, and with Winters Bros. Transfer Stations of CT, Inc. for processing single stream recyclables generated within the region in Shelton. Both contracts expire on June 30, 2019. As a region we lack the legal authority to control the flow of solid waste generated within our borders, so not all MSW ends up being disposed at the contracted facilities. At present the Authority has no contracts for or control over C&D waste.

The Authority contracts with Wheelabrator to operate three transfer stations for use by collectors in the region, one in Ridgefield, one in Newtown and one in Danbury whose operation is subcontracted to Winters Bros. In addition, 8 of our 11 municipalities operate a local municipal transfer station for their own residents who choose not to contract with a collector and the City of

Danbury contracts with Winters Bros. to operate a similar Mom and Pop Recycling Center for city residents.

We provide the above description to point out that in some aspects the solid waste system in our region is similar to that in other parts of the state and in other respects we are quite different. While our member municipalities have worked together for many years through HRRAs to fulfill their mandated solid waste responsibilities per state statute, the solid waste system in our region cedes much more control to the private sector than in other parts of the State.

Overall the HRRAs agree that the three objectives to be met, i.e. improvement of municipal recycling systems and compliance with mandatory recycling provisions, development of new technologies, and systematic implementation of product stewardship across all product categories, will be most likely to achieve the goal of a 60% diversion from the existing solid waste stream by 2024 and commends the DEEP for choosing these objectives.

There are four comments/concerns I would like to highlight in my testimony.

1. HRRAs municipalities do not object to being measured and held accountable for reaching set recycling metrics, but we do have serious concerns about the validity, reliability and timeliness of the data that will be used to determine a municipality's recycling rate and hence a municipality's compliance with state statute and the CMMS. Such data must be accurate and consistent for all municipalities in the state. All data reporting entities must have enforceable deadlines, consistent forms for reporting, and training must be provided to all stakeholders in the solid waste system who interface with the data reporting system from individual haulers to transfer station operators to scale house operators. If municipalities are going to be held to a recycling metric, then they must have real time access to data to determine what is working in their recycling program and what is not. Data that is not available for years after collection will not work. Data must be available monthly or at least quarterly. And finally, the plan to have a new state web portal for e-reporting for 2018 is too late. Data collection and accessibility need to be improved now.
2. If a municipality is engaging in best practices but still does not meet the 25% or 45% rate by 2018 or 2024, the municipality should be allowed to try whatever additional option(s) will work best for them to increase recycling rather than mandated to enact UBP. Since UBP programs are difficult to adopt and enforce in a system with 100% private subscription service like the HRRAs region, there has to be other options available such as implementing organics collection that might work better in such areas. It would be extremely difficult to implement and enforce a UBP program in a region such as the HRRAs with 100% private subscription waste collection unless the municipalities set up some type of franchised collection system across the region, an idea that is strongly opposed by the solid waste collectors in the region.
3. The HRRAs is seriously concerned about access to affordable MSW disposal options when its current WTE contract expires in 2019. To provide the most options possible at that time we urge that the CMMS consider allowing for MSW rail transfer to out of state WTE facilities and to out of state landfills if facilities higher on the hierarchy are unavail-

able or priced beyond reasonable market levels. In order to minimize the MSW that must be disposed of, we also urge that the CMMS consider allowing for mixed waste processing facilities to further separate recyclable commodities from MSW after initial source separation. In addition, neither of these changes will be helpful if permitting takes too long. The permit process at DEEP must be revised to produce faster results or the technological innovations necessary to reach the 60% diversion rate will not be available in Connecticut.

4. Something has to be done about glass - sooner rather than later. Trying to recycle glass is hard on MRF machinery, contaminates other commodities, and cuts into municipal recycling rebates and MRF operator profits at a time when the commodity market is already so low as to endanger the entire recycling system. If the best we can do with glass is use it for alternate daily cover, then glass should be taken off the list of mandatory recyclables in the state. Products that are hard to dispose of properly or cost a lot to dispose of are good candidates for EPR programs. The CMMS should consider whether to add glass to the product stewardship priority list in the state in order to recycle the most possible, to encourage manufacturers to use non-glass packaging when appropriate and to save municipalities the cost of disposing of or recycling glass. If or when glass is removed from the recycling stream, the CMMS should allow for an adjustment in the municipal recycling rates because the recycling rates for municipalities across the state will plummet. However, that is not a reason to keep glass as a mandatory recyclable when there are few markets for it.

HRRA does have comments, concerns and suggestions about these four as well as other aspects of the proposed CMMS as they relate to our member municipalities and the solid waste system in our region. Our comments are attached in bulleted form for your consideration. Please feel free to contact me at 203-775-4539 or by e-mail at JenIannucci@hrra.org if you have questions about our bulleted comments or want more detail. Thank you again for the opportunity to provide input on the CMMS.

Bulleted CMMS Comments from HRRRA

1. **HRRRA agrees with the three objectives of the strategy:**
 - a. Improvement of municipal recycling systems and compliance with mandatory recycling provisions
 - b. Development and deployment of new technologies such as AD
 - c. Systematic implementation of product stewardship across all product categories

2. **Product stewardship objective**
 - a. Revisit and perhaps revise the product stewardship priority list
 - i. Consider adding a prescription drug EPR program to the priority list
 - ii. Consider adding a glass container EPR program or take glass off the list of mandatory recyclables
 - iii. Consider a HHW EPR program

3. **New technology development and deployment objective**
 - a. Allow permitting of mixed waste processing facilities to further separate recyclable commodities from MSW after initial source separation.
 - b. To plan for the inevitable in-state WTE processing capacity shortfall, allow permitting of rail transfer of MSW to out of state WTE facilities and to out of state landfills if facilities higher on the hierarchy are unavailable or priced beyond reasonable market levels - especially for regions on the state border.
 - c. Significantly improve the time required for DEEP to permit a facility utilizing new technology. The current permit process remains too slow to get the job done.

4. **Improvement of municipal recycling systems and compliance with mandatory recycling provisions objective**
 - a. Is the plan for State wide recycling education program and the recycling enforcement plan through DEEP realistic given the state's current and future financial constraints? Without state action, those responsibilities will once again fall on the shoulders of municipalities, the same as now, with likely the same result.
 - b. Plan should allow for regional solid waste organizations to exercise some type of enforcement action on behalf of member municipalities and/or the state.
 - c. A pilot program for a building or demolition permit deposit system for C&D recycling seems reasonable and something HRRRA municipalities could support.
 - d. For municipalities that participate in a solid waste region, the CMMS should consider allowing compliance with the recycling rate metric to be determined on a regional basis rather than by municipality.
 - e. If a municipality is engaging in best practices and has yet to meet the 25% or 45% rate, they should be allowed to try whatever options will work best for them to increase recycling rather than mandated to enact UBP. Since UBP programs are difficult to adopt and enforce in a system with 100% private subscription service like the HRRRA region, there has to be other options available such as implementing organics collection that might work better in such areas.
 - f. It would be extremely difficult to implement and enforce a UBP program in a region such as the HRRRA with 100% private subscription waste collection unless

the municipalities set up some type of franchised collection system across the region, an idea that is anathema to the solid waste collectors in the region.

5. Data concerns

- a.** HRRRA municipalities don't object to being measured and held accountable for reaching a set recycling metric such as 25% by 2018 and/or 45% by 2024. However, the data used to measure compliance must be accurate and consistent across the state.
- b.** Current measures of recycling by town of origin are incomplete, items not currently captured anywhere in a report to DEEP include back hauled OCC and plastic film from grocery and big box stores, paper shredders, junk collectors, landscapers, Salvation Army/Goodwill and other reuse stores, onsite leaf and brush disposal, backyard composting, industrial scrap, mattresses, paint, out of state disposal, etc.
- c.** Current measures of recycling by town of origin are sometimes inaccurate.
- d.** Different transfer station facilities report in different ways on different forms.
- e.** Why does the CMMS want to measure the quality of the materials marketed? How will that ever be possible and how will it be tied back to the municipality of origin?
- f.** Municipalities have no control over the accuracy of private transfer station reports, hauler reports, etc. There are no consequences or penalties for poor reporting or failure to report.
- g.** Current DEEP annual hauler report forms are on customer unfriendly three legal size pages and can be easily reduced to one 8 1/2 x 11 sheet on two sides.
- h.** It is impossible many times to separate residential and commercial loads of either MSW and/or recyclables so that accurate data is reported on each sector. Small commercial solid waste looks much like residential solid waste.
- i.** If municipalities are going to be held to a recycling metric, then they must have real time access to accurate data to determine what is working in their recycling program and what is not. Data that is not available for years after collection will not help. Data must be available monthly or at least quarterly if it is to have any value to a municipality or region to use to improve its recycling rate.
- j.** The new state web portal for e-reporting in the action plan for 2018 is way too late. Data collection and accessibility needs to be improved now.
- k.** All data reporting entities must have enforceable deadlines, consistent forms for reporting and TRAINING must be provided to all stakeholders in the solid waste system who interface with the data reporting system from individual haulers to transfer station operators to scale operators, etc.
- l.** Reports from haulers should agree with reports from transfer station operators should agree with reports from MRFs and WTE facilities. Not the case now.
- m.** A materials management scorecard issued in December 2016 for a municipality in the state, given the current data available, will be meaningless because it will be based on incomplete and possibly inaccurate data.
- n.** If glass is removed from single stream recycling, adjustments must be made to the recycling rate expected of municipalities since glass provides the greatest weight in single stream and its removal will automatically lower all municipal recycling rates.

6. Responsible Parties

- a.** In several sections of the action implementation plans, municipalities are listed as responsible parties but in only two sections are regional solid waste/recycling authorities listed as responsible parties. If DEEP truly wants to deal with fewer entities and wants to encourage municipalities to work together on solid waste and recycling, then the role of regional authorities needs to be more accurately and expansively described in the plan. In addition, the two places where regional authorities are mentioned are as responsible parties in developing a pilot program for municipal building permits and in developing and refining performance standards for recycling and volume reduction facilities. Why those two areas? These seem like two of these least likely areas in which regional authorities could be helpful. Why are COGs also listed as responsible parties? The COG in our region, WestCOG, insists that solid waste is not a part of its charge from the state.
- b.** CT PSC should be identified in the plan and treated as a significant stakeholder and Responsible Party for EPR in the CMMS action plans.

7. Household Hazardous Waste

- a.** Until household hazardous waste can be made part of a product stewardship program, the CMMS should seek to develop at least one location in the State where HHW can be disposed of all year round even if for a nominal fee. It is ridiculous and environmentally inappropriate that homeowners moving during the winter months or cleaning out a home where elderly parents have died or moved to assisted living have no in-state option to do the right thing with their HHW other than paying hundreds of dollars for a pick up at their door or asking a neighbor to hold onto their material until the next HHW collection is held in their region.



145 Dennison Road
Essex, CT 06426
860/581-8554 FAX: 860/581-8543
www.rivercog.org

Chester, Clinton, Cromwell,
Deep River, Durham, East Haddam,
East Hampton, Essex, Haddam,
Killingworth, Lyme, Middlefield,
Middletown, Old Lyme,
Old Saybrook, Portland, Westbrook

April 20, 2016

Mr. Lee Sawyer, Project Manager
Bureau of Materials Management & Compliance Assurance
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, Connecticut 06106-5127

RE: Comments on CT DEEP's Draft Comprehensive Materials Management Strategy

Dear Mr. Sawyer:

First, thank to you and your DEEP colleagues for meeting with our group last Tuesday, April 5th to review details of the draft Comprehensive Materials Management Strategy intended to update the State of Connecticut's Solid Waste Management Plan.

The Lower Connecticut River Valley Region is composed of 17 member municipalities including the City of Middletown. All of them will be impacted to varying degrees by the proposed Strategy. While the goal of a 60% diversion from the solid waste stream through source reduction, recycling and new technologies is laudable, the region's municipalities are concerned that it may not be achievable by the proposed 2024 target date.

The draft Strategy appears to be optimistically reliant on the emergence of new technologies to accomplish much of this diversion. Residents of the State of Connecticut generate some two to three million tons of solid waste annually. Presently, these alternative systems are in their infancy and cannot be relied upon to make significant contributions toward the enhanced diversion goal. To that end, while this conversion evolves, the Strategy should also recognize and help sustain the present Trash to Energy model which continues to serve our residents well in a cost effective fashion providing an environmentally palatable alternative to landfilling.

The recycling component detailed in the document is ambitious as well, but hopefully achievable. It will however require a resurgence in the value of recycling commodities which are presently providing little or no offset to municipalities to mitigate their disposal costs. If possible, the Strategy should investigate and propose steps to reenergize these markets, including finding and DEEP permitting new uses of recycled materials in the state. Increasing the use of recycled materials in Connecticut will minimize the

increased costs which will inevitably be associated with the removal of additional recyclable materials from the waste stream.

Recycling of construction and demolition waste would appear to provide the greatest opportunity to make gains toward achieving the minimum 45% goal and saving municipalities money. Here again, however, the document offers no specific proposals to repurpose these materials or incentivize their specialized disposal. Siting and permitting of such facilities for this purpose should also be given more attention.

River COG also has concerns about the enforcement language in the Strategy. At this stage in its development, enforcement methods and penalties are not clearly outlined. It also seems that a significant amount of responsibility for success of the plan will fall to the state's cities and towns and we are concerned that achieving these new goals will be more "stick" than "carrot" driven. It was encouraging to learn that the newly created CT Recycles entity created by P.A. 14-94 will begin to receive more funding. Without a vigorous education program in place, achieving the 60% goal will be challenging, if not impossible. We support both aggressive funding and staffing for CT Recycles as a means of easing the burden on municipalities to pay for this component in the absence of a state commitment.

Thank you for this opportunity to provide comment as the CMMS takes shape. River COG looks forward to working with CT DEEP in formulating a document enabling achievement of the stated goals in a fashion that is partnership based rather than adversarial.

Sincerely,

A handwritten signature in blue ink, appearing to read "Samuel S. Gold".

Samuel S. Gold, AICP
Executive Director

Brian D. Bartram
Manager
bbartram@salisburyct.us
Telephone: 860-435-5178
Fax: 860-435-5172
www.salisburyct.us/transferstation

**SALISBURY / SHARON
TRANSFER STATION**
309 Sharon Road
P.O. Box 548
Salisbury, Connecticut 06068

Curtis G. Rand
First Selectman, Salisbury

Brent M. Colley
First Selectman, Sharon

**Towns of Salisbury & Sharon
Transfer Station Recycling Advisory Committee (TRAC)**

April 20, 2016

Comments on Draft CT DEEP Solid Waste 2016 Plan (CMMS)

1. **Sect VIII page 35 – Uncertain future for Existing Resource Recovery Facilities**
Sect VIX G page 44 – The Role of Quasi-Public Agencies in Infrastructure Modernization
 - Salisbury and Sharon have had a long and successful working relationship with CRRRA, now MIRA. The Torrington Transfer Station, which serves our MSW disposal and Single Stream Recycling needs, should remain under public or quasi-public ownership and the disposal of the MSW at a level equal to, or above, resource recovery.

2. **Sect VI page 33 – C&D Processing**
Sect IX f page 42 – Increase Recycling & Reuse of C+D Materials & Oversized MSW
Sect IX e page 40 – Increase Source Separation and Composting/Conversion of Food Scraps and Organics
 - TRAC remains supportive of diversion of both Demolition and Organics from the waste stream. However, given Salisbury's and Sharon's geographical location relative to potential markets TRAC has concerns regarding the cost of hauling to those markets and the corresponding carbon footprint. A solution for on-farm composting should be a priority.

3. **Sect IX page 36 – Opportunities to Increase Diversion**
 - Voluntary corporate responsibility for end of life recycling or disposal of their products should be a precursor to mandated programs. Mandated programs must not result in a net cost increase for managing the products.

Respectfully submitted,

Bob Palmer
Chairman
Salisbury/Sharon Transfer Station Recycling Advisory Committee
P.O. Box 548
Salisbury, CT 06068-0548

From: [Ed Mone](#)
To: [DEEP CMMS](#)
Subject: Survey response
Date: Monday, March 14, 2016 11:31:41 AM

Unit based pricing: If this is interpreted to mean a program that requires individual households to pay for their own disposal costs, then I object. We at the municipal level have been able to control costs through regional partnerships (MIRA), by the bid process and savvy negotiations with contractors. Residents have come to expect that this service will be provided by local government.

Edmond V. Mone

First Selectman

Town of Thomaston

860.283.4421