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August 27, 2021

DEEP Implementation of Public Act 21-58: Bottle Bill Modernization

NOTICE OF PROCEEDING, SCOPING MEETING AND AN OPPORTUNITY FOR PUBLIC COMMENT, Comments by Strategic Materials, Inc.

Strategic Materials, Inc. (“SMI”) is pleased to offer responses to Department of Energy and Environmental Protection’s (the Department) Opportunity for Public Comment on the implementation of Public Act 21-58: *Bottle Bill Modernization*, issued on July 16, 2021. Specifically, SMI offers comments to questions ten and eleven regarding the Draft Memorandum of Agreement (MOA) for In-State Processing of Wine and Liquor Beverage Containers, due to the General Assembly on January 15, 2022.

SMI is North America’s largest and most comprehensive glass recycler, with nearly 50 locations in the United States, Canada and Mexico, including a facility located in South Windsor, Connecticut, which employs twenty-five people. At our facility, we primarily receive glass through the bottle bill and recycle it to make new, high-quality products. Ultimately the glass recycled has been diverted away from the waste stream headed for landfill or incineration plants. We also receive plastic, aluminum, and cardboard for recycling.

Question 10: What are the requisite parties that should be included in such an MOA, and how can DEEP efficiently facilitate discussions among such parties?

SMI’s recycling process depends on a steady stream of high-quality diverted glass as a feedstock that SMI purchases per ton based largely on the purity of the material. Given SMI’s interest in more cullet recapture, SMI respectfully asks to be included in the MOA process as an interested party, if not a party to the MOA itself, given its position as the only bottle-to-bottle recycler in the state. SMI’s South Windsor facility has capacity to take largely all, if not all, the additional cullet the state can successfully recover. SMI can attest to the fact that there is a market for cullet. SMI’s customers use our glass to make high quality products, like new bottles as mentioned above as well as fiberglass insulation.

Glass is infinitely recyclable, which makes it a material that can sustain a truly closed loop process. Also, as the Department is aware, building an efficient, well-functioning cullet recapture infrastructure in Connecticut will result in reduced costs for customers and reduce the environmental impacts from the state's waste stream. Recapturing more cullet is a winning proposition for Connecticut.

SMI encourages the Department to convene the various parties for a discussion to identify the key impediments to cullet recapture in Connecticut as well as any expectations the Department has regarding the methods and manner of cullet recovery.

SMI looks forward to bringing its experience and expertise to the discussion as facilitated by the Department. We are happy to share our experiences with options that are effective, as well as the pitfalls of various collection options. Ultimately, the key to quality is avoiding glass comingling with "contaminants" like food and paper, which make separation costly. Preventing or minimizing comingling can be accomplished multiple ways and SMI looks forward to the discussions in the context of crafting a draft MOU.

11. What best practices/programs should the wine and liquor industry utilize to help them achieve the goal of collecting and processing of at least 80% of the wine & liquor containers sold in the state?

The bottle bill has worked effectively to deliver high quality cullet, but it is not the only method of collection available. Drop off programs have worked effectively in small quantities in other jurisdictions and is now a system being implemented in the Housatonic Resources Recovery Authority municipalities. Other methods of capturing quality glass include incentivizing micro-haulers and mandatory glass segregation and collection for bar and restaurant permit holders. It will be very difficult to reach 80% without a bottle bill program, however these are some viable options that municipalities and/or regions can pursue to begin building a better glass management infrastructure.

Thank you for the opportunity to offer comments. SMI looks forward to working with the Department and stakeholders to reach an 80% goal.

Sincerely,

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