

To whom it may concern,

Thank you for this opportunity to comment on this Waste Infrastructure Request for Information. First I would like to commend DEEP for their efforts made around food waste. This represents an important component of waste reduction and I appreciate the serious efforts around this.

A few comments on this process to begin. While as mentioned I appreciate some of the efforts and challenges of managing waste in CT I do have some concerns on how this process is being framed. While it is less than ideal to be shipping waste outside our state this self sufficiency crisis needs to be looked at in a broader context. (These are followed by some practical suggestions on how to mitigate waste issues in CT).

1. CT has some troubling issues with air quality and asthma. Here is a report from the American Lung association that provides one but not the only indication of this.

quality. <https://www.lung.org/research/sota/city-rankings/states/connecticut>

For our most vulnerable communities in particular every time we speak of the self sufficiency crisis we ought to be also having a conversation about the air pollution/asthma crisis faced by those in CT. We ought to be careful that any proposed solution on Waste Infrastructure does not aggravate this situation.

2. While land filling is not ideal and I am very much aware of the methane, transportation, and sometimes leaching issues with landfills, the EPA's privileging of incineration in the waste hierarchy is currently under reevaluation <https://www.epa.gov/smm/sustainable-materials-management-non-hazardous-materials-and-waste-management-hierarchy>. When we make decisions which will potentially affect the health and environment of CT we must make sure we are operating under the most current understanding of science. I worry that there is a tendency to rely on outmoded data and conclusions as it relates to incineration in particular. Here is a paper by Dr. Jeffery Morris providing perspective which may be helpful on the impact of processing various residuals in our waste stream <https://www.energyjustice.net/files/waste/leftovers.pdf>

3. While it is laudable that DEEP has expressed concerns regarding the impacts on residents living close to landfills in Pennsylvania, I worry that we are not seeing the same level of concern with regard to other EJ communities in CT and neighboring states. The Putnam ash landfill expansion, sighted upstream on the biggest river system in Eastern CT, will continue to incentivize trash burning throughout our region. In all likelihood much of this trash burning will be happening in EJ communities. While this is "in state" two points are worth noting here. First, this too is land filling and along with many of the dangerous chemicals released into the air it is my understanding that we still need to landfill a third of the initial product in the form of ash. While I understand we don't want to burden other states and other communities with our waste issues, we don't need to be waste martyrs either. I am troubled that while we are concerned to export waste we seem very willing to import waste from around the region (in one of our EJ communities).

4. Generally I am concerned that DEEP, in part under the influence of the Solid Waste Task Force formed during last year's legislative session, is moving too quickly from reduction to processing of residual waste. Any new facility will likely require years to build and approve and I believe we still have a lot of room to run on implementing other waste reduction strategies which could be more cost effective, environmentally friendly and obviate the need for much of the new proposed infrastructure.

Ideas and opportunities for Waste Reduction

To state the obvious if our goal is truly to deal with this crisis DEEP and the state of CT more broadly ought to be considering solutions which may be cost effective with less externalities which could truly improve our waste situation.

1. Education

We need to make sure we are not just providing opportunities to learn but actively communicating and reinforcing best practices through various channels. This requires resources but is often money well spent if carefully directed.

a. **We ought to engage in well funded education campaigns (particularly "on the bin" education) to make sure there is as much understanding as possible of how to deal with recyclables.** There is a lot of fouling of our recycling stream because of a lack of education. In many ways the move to single stream created a lot of confusion in CT with many even wanting to do the right thing left confused. This could reap real dividends in waste reduction and we probably ought to be listening closely to resolve the issues found by those tasked with processing and enforcement to send the right message.

b. **Education of large sources of waste be it schools, restaurants, other commercial and industrial facilities.** Many facilities may be willing to adopt better practices but simply haven't for lack of understanding. It is important that we do our best to make sure individuals throughout an organization are educated as often waste management practices fail because not everyone involved knows the right way to do things.

c. **Education for Municipalities on best practices.** While I understand DEEP has done some work here in this regard we should consider stepping up our efforts as there is a potential for some meaningful impacts.

d. **Education on managing construction waste.** Many construction sites could improve their waste efforts, sometimes with comparatively little effort, but contractors and workers need to be aware of best practices here.

e. Education on managing Agricultural Waste

2. Incentives for adopting best practices

Sometimes one is adequately educated but organizations have moved towards more wasteful practices out of economic calculation. While I realize the resources of the state of CT are not infinite there will likely be significant resources needed to process an excess of waste. If some of these resources are put towards incentives, particularly for those creating the most waste to adopt waste reduction practices, we could see some serious improvements in our waste programs.

a. **Incentives for dishwashing** To give just one example, many schools, restaurants and other facilities have removed dishwashers (both mechanical and human) and created a lot of disposable waste in the process. This is just one area where a little assistance from the state could help make a real impact in waste reduction.

b. **Incentives so that if it touches food it should be washable, compostable or to a lesser extent easily recyclable (with a high recovery rate)** . We create a tremendous amount of waste because of contact with food. If a facility cannot move towards dish washing, items that come in contact with food ought to be compostable and added to that waste stream. There are many compostable products which now exist but are not always cost competitive with plastic waste. Incentivizing facilities which create less plastic and more genuinely compostable waste could also be really helpful. (I understand there were some efforts potentially relevant here in the proposed packaging bill. I am certainly in favor of a strong packaging bill but we must make sure it has mandates for reduction, penalties for failing to reach those benchmarks, strong non-industry oversight, and does not create backdoors for unproven and potentially

dangerous approaches to waste management, i.e. which chemical recycling has shown to be in actual practice).

c. Incentives for municipalities to adopt pay as you throw (unit based pricing) programs Having followed closely the proposal of one of these programs in my home town of Killingly it became clear that while these programs would probably have been beneficial for many residents it was not quite attractive enough to be adopted. These programs if adopted could make a big impact on waste reduction. There were also some ancillary concerns which really weren't strictly related to the pay as you throw aspects of the program. As several CT municipalities have gone through these processes I think it is worth listening and understanding the valid sources of hesitation in adopting these programs and see if there are ways to make the programs more attractive to municipalities and residents.

c. Incentives for Schools, Construction, Commercial, Agricultural and Industrial facilities to adopt best practices Again while I realize the resources of the state are not unlimited there are places where a tremendous amount of unnecessary waste is created because we not adopting best practices at these points. While the State may not have the opportunity to intervene everywhere they should consider creating incentives for best practice adoption where they are most impactful and/or cost effective. DEEP may need to conduct some research along with listening and outreach to get a better sense of where opportunities and best practices exist. That said, it likely would be well worth the effort.

3. Monitoring and Enforcement

Part of our waste problem redounds to folks who should not following best practices in waste management. While generally I am a much bigger believer in education and incentives over enforcement there are times where carelessness or callousness in dealing with waste creates a lot of unnecessary trash . Our state must have adequate resources to ensure a thoughtful measured yet proactive approach to reduce waste. By and large this is simply a matter of directing adequate resources in this direction particularly wherever intervention can reduce volume the most.

4. Continue to carefully research truly best practices and be skeptical of those favored by major producers of waste

Those who produce a tremendous amount of difficult to dispose of waste spent a lot of resources trying to convince DEEP to favor those practices which most closely align with business as usual. The plastics industry and those who lobby for them have created a veneer of sophistication around various chemical and advanced recycling which is in no way matched by real world performance. Just as it would be foolish to anticipate fusion technology will solve our greenhouse gas issues (whatever its eventual promise) DEEP would be very foolish to rely on unproven and often very polluting technologies which rely much more on similar future promise than current performance. While there may be some exciting waste management technologies available we ought to be adopting some proven and often currently available means of waste reduction first.

While none of us have all the answers on waste reduction and management I hope the agency will keep an open mind and be just as proactive in finding ways to reduce as to process waste in CT. I am also a member of the CT ZERO Waste Coalition and have signed on and endorse the sentiments in their letter as well.