



WINDHAM SOLID WASTE MANAGEMENT DISTRICT
327 OLD FERRY ROAD, BRATTLEBORO, VT 05301
(802) 257-0272 windhamsolidwaste.org

Senator Wendy Harrison
34 Tyler St
Brattleboro, VT 05301

January 12, 2023

Dear Sen. Harrison:

*[will also be sent to the other Windham Senator, Nader Hashim;
and the 11 Reps who cover our member towns]*

Please accept this letter of support for the draft legislation, H.115. As you know, the WSWMD is responsible for assisting our 18 member towns with all aspects of solid waste management, including waste disposal and planning, reduction, reuse, and recycling. An important component of our mission is the collection and proper management of hazardous waste from households and small businesses in our region.

H.115, an act relating to household products containing hazardous substances, is an extended producer responsibility (EPR) for household hazardous waste (HHW) bill. This proposal has been thoroughly vetted over the last five years by lawmakers, stakeholders, and agency staff. All major players are on board with this proposal. The work has been done, and this program is ready to move forward to make a difference in reducing HHW in Vermont. As a member of the VT Product Stewardship Council, the District promotes EPR as a means of establishing more effective collection systems for problem wastes while reducing the cost burden on Vermont's municipalities. We've already seen EPR yield success in Vermont with electronics, paint, mercury lamps, mercury thermostats, and batteries. Collection rates for these wastes in Vermont are some of the highest nationwide, largely due to increased convenience and improved collection infrastructure. The funding mechanism proposed in H.115 will facilitate the creation and sustainability of an efficient, convenient, statewide collection program for HHW that would eliminate any gaps in available services, while providing ample opportunities for all residents to manage these wastes properly.

Windham Solid Waste Management District

The District operates a seasonal permanent collection facility in Brattleboro for HHW and small business hazardous waste, providing our residents and businesses with a convenient opportunity to keep these highly toxic wastes out of the landfill, and remove them from basements and garages. The HHW Depot is open every week from May through October. The number of households that use our facility has been increasing since it opened in 2021. In CY2022, 295 households brought HHW to the District for disposal. We managed 10 tons of HHW at the HHW Depot in CY2022. We also accepted hazardous waste from 13 small businesses in the District, who find our facility a convenient and much more affordable alternative to using a private, often out-of-State, hazardous waste company for disposal.

While our HHW Depot, along with our special one-day collection events, has provided convenient collection for our towns, success comes at an ever-increasing cost. The District spends more than \$30,000 per year to collect and manage this material. The District spends

between \$70 and \$220 per carload, while some other Vermont towns are spending up to \$400 per carload. An average of

Sen. Wendy Harrison

January 6, 2023

Page Two

\$1.6 million per year is spent by Vermont districts, alliances, and towns (according to DEC's survey data) in an effort to protect human health and the environment by keeping these products OUT of the landfill. Increased costs are driven by a shrinking pool of service providers coupled with both labor and supply chain shortages.

The number of household products with toxic chemicals being marketed to homeowners today is staggering. Each year, our staff must determine the most cost-effective and environmentally safe method to dispose of a myriad of constantly evolving chemical wastes, all while navigating a complex maze of Federal and State regulations designed to protect worker health and safety, and the environment. In the home, these wastes pose a risk of chemical exposure if improperly used or stored. In the trash, they present a tremendous hazard to waste collection personnel and facilities, eventually ending up as a potential groundwater contaminant once they reach the landfill. Even more concerning are hazardous wastes that are illegally spilled or dumped onto the land or poured directly into the waters of Vermont through drains or sewers.

The Solution

A comprehensive statewide program that allows residents to conveniently drop off HHW for safe disposal is the solution. To be effective, these programs must be sustainably funded, be readily available to everyone, provide sustained public education and outreach, and operate permanent collection facilities year-round. H.115 establishes an "extended producer responsibility" program that requires the producers of hazardous household products to pay for the management of HHW collection programs. HHW EPR programs relieve governments and taxpayers of the costs of HHW collection, and give consumers a safe, convenient way to get these products out of their homes. The program proposed by H.115 would be similar to the programs that Vermont now has to dispose of paint and electronic waste. We are spending more than \$1.6 million annually to manage HHW, costs which are passed on to local taxpayers. H.115 is a well-vetted proposal that puts some of the responsibility for managing disposal where it should be – on the companies that manufacture these products. Hazardous waste collection is one segment of our mission that is especially suited for product stewardship. It's time for Vermont to once again lead the nation in creating a successful collection system that protects the health of its residents, our sanitation workers, and the environment.

I thank you for your careful consideration of this bill, and for all of your efforts to make Vermont a cleaner, safer place to live.

Sincerely,

Bob Spencer, Executive Director
Supervisors

Sincerely,

Michelle Cherrier, Chair of the Board of