

# Options for Meeting the MMP HHW/CEG Hazardous Waste Requirements

## March 13, 2015

The purpose of this document is to clarify the Household Hazardous Waste (HHW) and Conditionally Exempt Generator (CEG) hazardous waste collection requirements of the 2014 Vermont Materials Management Plan (MMP) and to clearly explain the options for Solid Waste Management Entities (independent towns, alliances, groups or districts).

Items 1 and 2 below summarize the requirements that all Solid Waste Management Entities (SWME) must meet.

### 1. COMMON HHW MATERIALS

The MMP requires each SWME to demonstrate—by year 2 of their SWIP term—that year round collection options exist in their region for the following materials: batteries, fluorescent lamps, mercury thermostats, 1 and 20 pound propane tanks, electronics, paint, and used oil. Collection locations need not be operated by the SWME and can be privately owned, such as auto parts stores collecting used oil or hardware stores collecting paint and fluorescent lamps. If there is no collection option for a material in the region during the SWIP term, (due to the absence or closure of a collection location or reduction in services), then the SWME is responsible for providing collection options.

All collection locations must have operating hours on at least 1 week day and 1 weekend day per week.

### 2. HHW/CEG HAZARDOUS WASTE COLLECTION OPTIONS

The goal of the MMP's HHW/CEG Hazardous Waste performance standards are to provide all Vermonters with more consistent and convenient options for disposal and proper management of the most toxic materials in the waste stream. These collection options are based on meeting both minimum frequency and minimum distance to collection options over the term of the SWIP.

Solid Waste Management Entities can meet these performance standards through a variety or a combination of these following options:

#### Option A: Operate a Permanent Facility

**Frequency:** Operating a permanent HHW/CEG collection facility that is accessible to SWME's residents and CEG businesses satisfies the MMP's frequency standard for HHW/CEG collection, provided the facility meets the following:

- Permanent HHW facilities must operate for a minimum of 4 hours per day and be open on at least one week day and one weekend day per week (minimum of 8 hours total per week).
- In order to construct and operate a facility to collect and store HHW/CEG materials, the solid waste management entity (SWME) must obtain a solid waste certification for the HHW facility.
- The HHW facility must meet at a minimum the requirements for small quantity generators from the VT Hazardous Waste Management Regulations such as (but not limited to) indoor temperature controlled storage for materials subject to freezing and expansion; impervious surface; and spill and fire control equipment. It shall also include a facility management plan containing processes specific to hazardous wastes, such as operator safety, operator training, material screening and material testing protocols, material storage, contingency planning, and dealing with "midnight drop-offs."

**Distance:** To satisfy the MMP's distance standard that is effective in SWIP Year 4, each town located within the SWME region must have access to the facility within 15 miles or have access to at least **one**

event within 15 miles annually. This may necessitate having collection events in the SWME's region, in addition to the permanent facility, to meet this standard.

### **Seasonal Permanent HHW Facilities**

Permanent HHW Facilities that operate seasonally will be considered by ANR as fulfilling MMP requirements as long as the following conditions are met:

- must be open for collection May 1<sup>st</sup> – September 30<sup>th</sup>
- must meet the minimum operating hour requirements as stated above
- must meet the 15 mile radius requirements ensuring convenience as stated above.

An example of a seasonal facility fulfilling the MMP requirements is in the Northeast Kingdom Waste Management District where the district operates a seasonal facility and holds multiple collection events throughout their district.

### **Option B: Host One Day Collection Events**

In lieu of a permanent facility, SWMEs can hold collection events for HHW/CEG.

**Frequency:** The minimum number of events required if there is no access to a permanent facility are as follows:

- SWIP Year 1 (2015 season) - 2 events
- SWIP Year 2 (2016 season) - 2 events
- SWIP Year 3 (2017 season) - 3 events
- SWIP Year 4 (2018 season) - 3 events
- SWIP Year 5 (2019 Season) - 4 events

Collection events must operate for a minimum of 4 hours, with a minimum of one in the spring and one in the fall.

If a SWME provides more collection events above the minimum required for their region, requests to reduce the minimum 4 hour duration will be considered by ANR.

**Distance:** For SWIP Years 4 and 5, each SWME must ensure that each town has access to a HHW/CEG event or permanent facility within a 15 mile radius and if a town or area of the SWME's region does not have access within 15 miles, the SWME will offer an additional HHW/CEG event in this town or area.

### **Option C: Share Access to Events and/or a Facility with other SWME**

**Collection Events:** One day collection events may be shared by multiple SWMEs as long as there is a clear, signed agreement and the following conditions are met:

- All SWMEs utilizing the events to meet their MMP requirements must be geographically adjacent to the event location;
- Frequency: Must meet minimum collection event requirements; and
- Distance: Each town located within the SWME region must have access to at least one of the events within 15 miles annually.

For example, Greater Upper Valley SWD and the town of Hartford are two different SWMEs with two different SWIPs, and can share HHW events.

**Permanent Facilities:** Access to permanent collection facilities may be shared by multiple SWMEs as long as there is a clear, signed agreement and the following conditions are met:

- All SWMEs utilizing the facility to meet their MMP requirements must be geographically adjacent to the facility location;

- Frequency: Must meet minimum permanent facility requirements; and
- Distance: Each town located within the SWME region must have access to either the facility or at least one event within 15 miles annually.

For example, an alliance could have a signed agreement with an adjacent district to access the district's permanent facility to satisfy the frequency standard and would hold annual events such that each town in the alliance has a collection option within 15 miles to satisfy the distance standard.