

**From:** Lisa Liotta <Lisal@cvswwmd.org>  
**Sent:** Friday, January 28, 2022 2:29 PM  
**To:** Knaebel, Karen  
**Cc:** Brenna Toman; Stefan Malner  
**Subject:** FW: Public Comment Period- Sale of Mercury-Containing Lamps - DRAFT Determination Notice - CVSWMMD Comments  
**Attachments:** CVSWMMD -- Comments on ANR Draft Decision, CFL Lamps -- January 28, 2022.pdf

**EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.**

Dear Karen,

Thank you for the opportunity to provide comments on ANR's draft determination.

Please find our comment letter attached.

Sincerely,

**Lisa Liotta**

General Manager (she/her)

Central Vermont Solid Waste Management District

Office: 802.229.9383 x 108

[CVSWMD.org](http://CVSWMD.org) | [ARCC](#) | [Facebook](#) | [YouTube](#)



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**From:** Roethlein, Mia <[Mia.Roethlein@vermont.gov](mailto:Mia.Roethlein@vermont.gov)>

**Sent:** Wednesday, December 29, 2021 11:32 AM

**To:** [anr-swrecyco@list.vermont.gov](mailto:anr-swrecyco@list.vermont.gov); [ANR.HWNnetwork@list.vermont.gov](mailto:ANR.HWNnetwork@list.vermont.gov); [ANR-SWME@list.vermont.gov](mailto:ANR-SWME@list.vermont.gov)

**Subject:** [ANR-SWRecyCo] Public Comment Period- Sale of Mercury-Containing Lamps - DRAFT Determination Notice

The Agency of Natural Resources is making a draft determination that screw-based mercury-containing CFL lamps shall not be sold, offered for sale, or delivered to a retailer for subsequent sale in the state of Vermont. This draft decision will be posted for public comment for a period of 30 calendar days.

<https://dec.vermont.gov/content/10-vsa-%C2%A77152a6-sale-mercury-containing-lamps-draft-determination-notice>

Stakeholders and interested parties can submit comments regarding this [draft determination](#) to Karen Knaebel at [karen.knaebel@vermont.gov](mailto:karen.knaebel@vermont.gov) by 4:00 pm EST January 28, 2022. The Agency's draft decision document, response, and final determination will be posted at: [www.mercvt.org](http://www.mercvt.org) and also sent by e-mail to mercury-containing lamp stakeholders where ANR has contact information. If you wish to be added to the e-mail stakeholder list, please provide your contact information in response to this email.



**Karen Knaebel** | Environmental Analyst

Vermont Agency of Natural Resources | Department of Environmental Conservation

Waste Management & Prevention Div., E-Cycles/Mercury Programs

1 National Life Drive, Davis 1 | Montpelier, VT 05620-3704

802-522-5736 cell | 855-632-9253 toll free

[www.Ecycles.vermont.gov](http://www.Ecycles.vermont.gov)

[www.mercvt.org](http://www.mercvt.org)

Please note I am in the office on Mondays, Wednesdays and Thursdays.



**Department of Environmental Conservation**

**Mia Roethlein**

Environmental Analyst V

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January 28, 2022

Karen Knaebel, Environmental Analyst  
Vermont Agency of Natural Resources  
Department of Environmental Conservation  
Waste Management & Prevention Div., E-Cycles/Mercury Programs  
1 National Life Drive, Davis 1  
Montpelier, VT 05620-3704

Re: Comments to 10 V.S.A. §7152(A)(6) SALE OF MERCURY-CONTAINING LAMPS DRAFT DETERMINATION

Dear Karen,

Thank you for the opportunity to comment on the draft determination related to 10 V.S.A. §7152(A)(6) Sale of Mercury-Containing lamps. The Central Vermont Solid Waste Management District (CVSWMD) agrees with the Agency's determination that screw-based compact fluorescent lamps should not longer be allowed for sale in the State of Vermont. There are other lamps widely and readily available that equal or lower priced than CFLs, more energy efficient, and free of mercury, which poses significant danger to people, wildlife and the environment when released.

CVSWMD is concerned about the manufacturer's collection program, particularly in regards to whether or not CFLs will continue to be collected under the current Extended Producer Responsibility program if manufacturers are no longer allowed to sell this product. As we all know, residents and businesses often have an inventory of these types of items (either currently in use or awaiting use) that may take several years to exhaust.

We believe that the lamp collection program is well-established and understood by Vermont residents. Keeping mercury out of the environment depends upon a continued, funded program to collect all of the mercury lamps in circulation, well beyond the date by which they can no longer be sold in the state.

Longer term, CVSWMD also supports a study and review of LED lights, which do not contain mercury, but do contain other toxic materials such as nickel, lead and arsenic, and whether an EPR program for this material is warranted in Vermont.

Sincerely,

Lisa Liotta  
General Manager, CVSWMD