



Bristol Resource Recovery Facility Operating Committee

43 Enterprise Drive
Bristol, Connecticut 06010
www.brrfoc.org

(860) 585-0419
(860) 225-9811
Fax (860) 585-9875

Testimony of the Bristol Resource Recovery Facility Operating Committee to the Environment Committee

March 22, 2013

Raised Bill No. 1081 - AN ACT CONCERNING RECYCLING AND JOBS

Good morning Senator Meyer, Representative Gentile and Members of the Environment Committee. My name is Mark Bobman, and I am the Executive Director of the Bristol Resource Recovery Facility Operating Committee (BRRFOC), comprised of fourteen towns and cities in Connecticut representing over 10% of the state's population.

We are concerned with the safe, environmental and cost-effective disposal of municipal solid waste and recyclables. In addition, since our Board is comprised of Mayors, Selectmen and Town Managers, we also represent the direct interests of our taxpayers, both residential and commercial. On behalf of our organization, I am presenting written testimony supporting the concepts incorporated in the Proposed Senate Bill No. 1081. We do have a number of concerns, as described below:

1. The proposed definition of "end user" (Section 221-207a (b)) refers to a "manufacturer who uses a material as feedstock to make a product" but does not stipulate that the product is marketable. Consideration should be given as to whether this creates an unintended opportunity for sham recycling.
2. Revisions to Section 22a-208f would require a scrap metal processor to identify the "type of waste stream that generated such scrap metal." This appears to be non-specific, and many of our member communities receive a variety of metals from residential and commercial sources. The communities likely would not be able to describe the "type of waste stream" to the processor other than to characterize the material as mixed residential and commercial scrap metal.
3. We are very interested in the "Municipal and Regional Incentive Program" (22-220 (k)) but would like to know what is contemplated as "other incentives" and "opportunities for new incentives." Also, we request further consideration of the requirement that a municipality or region be "committed, not later than October 1, 2013, to participate in such incentive program by agreeing to modernize the solid waste disposal pricing system used within such municipality or region to a unit-based pricing system, in accordance with an implementation plan approved by the commissioner." We generally understand this provision to relate to "pay as you throw" initiatives, which serve to reduce the amount of waste generated, and presumably promote recycling and source reduction. The October 2013 deadline is an aggressive target for many communities which have not fully examined how unit-based pricing will be implemented.

Berlin -
Denise McNair
Town Manager
(Secretary)

Branford -
Anthony DaRos
First Selectman
(Vice President)

Bristol -
Arthur Ward
Mayor

Burlington -
Theodore Shafer
First Selectman

Hartland -
Wade Cole
First Selectman

New Britain -
Timothy O'Brien
Mayor
(Treasurer)

Plainville -
Robert Lee
Town Manager

Plymouth -
Vincent Festa
Mayor

Prospect -
Robert Chatfield
Mayor

Seymour -
W. Kurt Miller
First Selectman

Southington -
Garry Brumback
Town Manager

Warren -
Jack Travers
First Selectman

Washington -
Mark Lyon
First Selectman

Wolcott -
Thomas Dunn
Mayor
(President)

Further, we feel the requirement for the Commissioner's approval could delay implementation, or result in unnecessary debate about how the pricing scheme is established, and which materials are subject to unit-based pricing. This requirement would appear to add to the workload of the Department of Energy and Environmental Protection (DEEP) at a time when critical resources are needed for programs more directly tied to environmental quality.

4. We are a well-established regional collaboration, addressing solid waste management for the fourteen communities for over twenty years. However, we are not, nor do the member towns wish to become an "authority," and the language in Section 22a-241 (d) potentially would exclude our communities from being included in the "Municipal and Regional Incentive Program." We believe the word "authority" should be replaced with "organization."
5. Deletion of the word "knowingly" as proposed in Section 22a-220a: "*[knowingly] mixes other solid waste with items designated for recycling pursuant to section 22a-241b*" presents a problem for solid waste collectors. Whether collection is performed by municipal forces or by contractors, it is an unfortunate reality that operators of the collection vehicles are not responsible for the contents of the receptacles, be they automated carts, roll-off containers, or front-end loaded containers. We suggest the inclusion of "knowingly" provides important protection against unwarranted or indiscriminate enforcement.

We thank you for the opportunity to provide these comments, and would be pleased to discuss these comments in more detail with members of the Committee and DEEP.