

DRAFT

TOWNS OF BENNINGTON & WOODFORD

Solid Waste Implementation Plan



Adopted by the Towns of Bennington Selectboard: _____

Adopted by the Towns of Woodford Selectboard: _____

Approved by the Agency of Natural Resources: _____

This Plan is issued in Draft form for Vermont Agency of Natural Resources (ANR) review and comment. It has not been approved by the ANR or adopted by the Selectboard.

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GLOSSARY

The following terms are used throughout this Plan and are provided to assist in clarification of acronyms or terms. Many of the definitions provided were taken from the Revised State of Vermont Solid Waste Management Plan Effective November 1, 2001. A footnote to the State Plan Glossary of Terms: "This Glossary of Terms does not provide legal definitions of terms. Instead, the intent is to provide consistent definitions of key words used in this Plan so that all readers have the same understanding of these terms as used in the context of this Plan."

ANR – Vermont Agency of Natural Resources.

Biosolids commonly referred to as sludge, are primarily an organic material recovered from the wastewater treatment process.

Composting means the aerobic decomposition of organic material in a controlled manner.

CEG - Conditionally Exempt Generator means a generator of hazardous waste which is conditionally exempted from certain provisions of the Vermont Hazardous Waste Management Regulations.

C&D - Construction and Demolition Waste means waste derived from the construction or demolition of buildings, roadways or structures.

Diversion Rate means the measurement of waste diverted (by composting, reuse, and recycling) compared to the sum of waste diverted and waste disposed (landfilled and incinerated). Or expressed as an equation:

$$\text{Diversion Rate (\%)} = \frac{\text{tons diverted}}{\text{tons diverted} + \text{disposed}} \times 100$$

OR

$$\frac{\text{tons of waste reused} + \text{composted} + \text{recycled}}{100} \times (\text{tons reused} + \text{composted} + \text{recycled} + \text{landfilled} + \text{incinerated})$$

HHW - Household Hazardous Waste is a broad term used to signify the automotive fluids and batteries, household chemicals, and electrical products with hazardous components that are disposed by households. The Vermont Solid Waste Rules define HHW as waste that would be subject to regulation as hazardous waste if it were not from households.

MSW – Municipal Solid Waste is household, commercial, institutional, and industrial solid waste generated in a given area.

Per Capita Disposal Rate means the average amount of waste disposed (landfilled or incinerated) per person for a given year. Or expressed as an equation:

$$\text{Per Capita Disposal Rate} = \frac{(\text{total tons landfilled} + \text{total tons incinerated})}{\text{per yr in a given Towns or district}} \times \text{total population of that Towns or district (may be adjusted for seasonal population)}$$

Recycling as defined in the Solid Waste Management Rules means the process of utilizing solid waste for the production of raw materials or products, but does not include processing solid waste to produce energy or fuel products.

Recycling Rate is the quantity of material recycled compared to the sum of recycled and disposed material. Or, expressed as a formula:

$$\text{Recycling Rate (\%)} = \frac{\text{tons of waste recycled}}{\text{tons of waste recycled} + \text{waste disposed}} \times 100$$

Septage means solids and liquids pumped from septic tanks or cesspools during cleaning.

Solid Waste (SW) is any discarded “garbage, refuse, septage, sludge from a waste treatment plant, water supply plant, or pollution control facility.” It also includes other discarded solid, liquid, or gaseous materials from industrial, commercial, mining, and agricultural operations, as well as from community activities. Certain materials are specifically exempted from the solid waste definition including animal manure and absorbent bedding used for soil

enrichment and “point sources” subject to Water Pollution Control permits.

Special Wastes are identified in the Solid Waste Management Rules as categories of solid waste that the Agency Secretary designates because they pose special environmental, health or safety concerns or have certain characteristics (e.g., size, composition) that cause problems in handling or management. Currently, the Secretary has designated asbestos waste, infectious waste (medical waste), hazardous waste from conditionally exempt generators, and liquids and liquid containers as special wastes in the Rules. Other wastes that may require special handling include tires, household hazardous waste, industrial sludges, bulky wastes, and large appliances.

Waste Prevention means the design, manufacture, purchase, or use of materials (such as products or packaging) to reduce the amount and toxicity of waste generated.

SECTION 1: INTRODUCTION AND HISTORY

The Towns agrees with ACT 78 in terms of Vermont tradition of local responsibility as evidenced by its solid waste management system that has been in-place for many years. The Towns have taken responsibility for solid waste management seriously as evidenced by moving forward with this revised comprehensive Solid Waste Implementation Plan. The Towns are in full support of the innovative and progressive waste management and waste reduction goals set forth in the Revised Plan adopted by the Agency of Natural Resources in 2001 and readopted in September 2006. This comprehensive waste management plan evaluates the Towns' existing programs and describes proposed programs to be implemented.

History of Solid Waste Planning

The early years....

In 1987 the State of Vermont passed legislation (Act 78) to develop a strategy for management of solid waste in the State. According to Vermont law 10 V.S.A. Section 6604, the Agency of Natural Resources (ANR) was required to adopt a Solid Waste Management Plan which sets forth a comprehensive state-wide strategy for long-term solid waste management. The ANR developed and adopted a Solid Waste Management Plan which became effective February 1, 1989. Additionally Act 78 required municipalities to take responsibility for waste generated within their jurisdiction through adoption of a comprehensive solid waste implementation plan.

In 1997 the Towns of Bennington wrote and adopted its first Solid Waste Implementation Plan (SWIP) consistent with the 1989 State Plan. The SWIP was approved by ANR on October 26, 1997 and adopted by the Selectboard on August 12, 1997. The plan was revised to include language regarding mercury containing products in 1998. The Towns of Woodford does not have an adopted or approved SWIP, and is being included with this Plan.

Recently....

Act 78 requires the State Plan to be revised every 5 years. In August 2001 the ANR adopted a Revised Solid Waste Management Plan which became effective November 1, 2001 and requires all SWIP's approved under the 1989 version to be revised to conform with the 2001 Plan. The State Plan was readopted in September of 2006 with no changes.

This SWIP was developed in conformance with the Revised State of Vermont Solid Waste Plan effective November 1, 2001.

Plan Intent

The purpose of this Plan is to describe the Towns' execution of programs for effective management of solid wastes. Through implementation of this Plan, the Towns of Bennington and Woodford will continue to satisfy the State's goals by placing a high priority on waste reduction and reuse. The Towns has evaluated the current waste management program and determined that priorities include (a) ensuring the community has accessible recycling and proper waste management opportunities and (b) increasing waste reduction and reuse efforts through education of residents and business owners.

Solid Waste Advisory Committee

The Towns have several residents that feel strongly about waste management and developed an Advisory Committee to promote the programs outlined in this Plan. The Committee, with assistance from Stuart A. Hurd (Bennington Towns Manager), developed the initial draft of this Plan. The draft was available for Towns residents to review and provide input.

The original Advisory Committee has been disbanded. The Towns of Bennington Selectboard has a new committee with approximately 5 members that meet on a quarterly basis to address the five goals outlined below:

- Implementation of the solid waste plan;
- Recommend future revisions to this plan;
- Complete or oversee studies and implement organize and identify educational systems and programs;
- Identify costs related to the implementation of this plan, and
- Keep up to date on current status of solid waste rules and regulations;

Selectboard Members:

Towns of Bennington

Lodie Colvin, Chair
John A. Zink, Vice-Chair
Sharyn Brush
Matthew Maroney
James A. Gulley, Sr.
Jason Morrissey

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Plan Development

This Plan describes how the Towns will achieve the following priorities (in descending order) of Title 10 V.S.A. Section 6604(a)(1).

1. The greatest feasible reduction in the amount of waste generated;
2. Reuse and recycling of waste to reduce to the greatest extent feasible the volume remaining for processing and disposal;
3. Waste processing to reduce the volume or toxicity of the waste stream necessary for disposal;
4. Land disposal of the residuals.

These established priorities and an evaluation of the current waste management system were the basis for design of this Plan. The original Solid Waste Advisory Committee believed that the key components to the continued success of effective solid waste management are through education, opportunity and lastly through enforcement.

This Plan describes how the Towns anticipate promoting these priorities through education of residents, business owners and the local school system. The Towns feels that the waste system is a cyclical one which begins with education. If people are educated and informed they will understand the importance of proper waste management and be enabled to seek out opportunities to reduce waste, buy recycled products, and reuse materials. The Towns can provide the opportunities, however the user/generator is the determining factor.

This Plan also describes the Towns' evaluation of the current waste management system and how to effectively improve it. Making the opportunities for recycling easy and accessible to people is necessary and can be achieved through the continued operation of the local residential drop-off which provides residents with cost-effective opportunities for discard of special wastes, recycling and yard waste.

The Towns will continue to evaluate the various components of this management system to ensure that residents and businesses are encouraged to reduce waste generation, reduce toxics use, reuse materials, buy recycled products and that they are informed about the proper management opportunities available to them.

As a tool for evaluation of the waste management system, the Towns will complete Biennial Implementation Reports as required by the ANR. The initial Report Form was completed in conjunction with writing this Plan and is included in Attachment A.

SECTION 2: TOWNS OVERVIEW

The Town of Bennington is Vermont's fifth largest community located in the southwest corner of Vermont, just 9 miles from New York and 14 miles from Massachusetts in Bennington County. The Towns of Bennington is also known for its historical landmarks. The Vermont Center for Geographic Information, Inc. and the Center of Rural Studies reports that the Town encompasses approximately ±36 square miles of land area. A solid waste transfer station is located in the Town of Bennington. The Towns owns the land, and Casella Waste Management, Inc. owns the facility and leases the land from the Town.

The Town of Woodford is a neighboring smaller community with 92% government-owned lands and significantly less development and population than Bennington Towns. The residents and businesses of Woodford utilize the Transfer Station and HHW events as well.

The Towns are a member of the Bennington County Regional Commission. Bennington is governed by a seven member Selectboard. Woodford is governed by a 3-member Selectboard. The Solid Waste Advisory Committee will act as an advisory to the Selectboards of both Towns on issues related to solid waste. Implementation of the Plan rests with the Selectboards.

This Plan was developed to provide a plan for effective waste management. It recognizes that there are several key components to the success of this Plan; the residents, the school system and local businesses.

Population

Statistical information for populations and following is the historic and projected population for the Towns. The population information for 1990 and 2000 was provided by Vermont Health Care Authority and the Center for Rural Studies website, and was confirmed in the Regional Plan. The projections for 2005 and 2006 were taken from the Regional Plan. For reference the printed data from the CRS website is included in Attachment B of this Plan, and the Regional Plan is provided as Attachment C.

	<u>1990</u>	<u>2000</u>	<u>2002 est.</u>	<u>2006 est.</u>
Bennington	16,451	15,737	15,631	15,349
Woodford	331	414	408	396
TOTAL	16,782	16,151	16,039	15,755

Schools

The Towns serve eight schools; Bennington Elementary, Catamount Elementary, Monument Elementary, Molly Stark Elementary, Mount Anthony Middle School, Mount Anthony High School, North Bennington Graded. The school system is an opportunity to educate younger residents about waste management. All schools are independently governed at the present time. This does reduce the Towns' influence over chosen curricula.

Businesses

The Solid Waste Advisory Committee had identified local businesses which may generate special wastes and/or CESQG wastes, and they can be found listed in Attachment K.

Municipal Facilities

There are several municipal owned facilities:

Bennington

Town Office Departments
North Bennington Village Fire Department
Bennington Rural Fire Department Dist. 1
Bennington Fire Department
Police Station
Public Works Garage
Wastewater Treatment Plant
Recreation Center

Woodford

Town Garage
Town Clerk's Office
Town Fire Department

The Towns garage facilities are used for minor vehicle maintenance of Towns vehicles, including oil changes. The Town manages used oil and antifreeze appropriately. The Towns has adopted a policy of purchasing products made from recycled materials for paper towels, toilet paper, or photocopy paper as is deemed possible.

SECTION 3: WASTE DIVERSION PROGRAM

According to the Revised State Plan, Section II, Critical Issue 1, to meet the 50% statewide waste diversion goal, ANR estimates that the average per capita municipal solid waste disposal rate statewide will have to be reduced from 3.4 pounds per person per day to less than 2.7 pounds per person per day. In order to meet this goal, the Towns are taking steps to reduce generation and divert MSW generated from disposal.

The 2002 Biennial Implementation Report contains detailed tonnage information and is included in Attachment A of this Plan. Table No. 1 was compiled using information provided by the Bennington Transfer Station Quarter Reports.

Material	Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec	Total Tonnage
Glass Containers	15.33	16.92	20.63	19.98	72.86
Metal Cans	10.40	9.83	6.16	6.38	32.77
Other Plastic	6.67	7.29	6.96	6.47	27.39
Co-Mingled Paper	33.41	46.39	35.02	39.42	154.24
Boxboard/Paperboard	8.41	8.82	8.16	7.83	33.22
OCC	118.19	120.91	134.34	132.75	506.19
Newspaper	32.91	33.23	30.13	34.37	130.64
Magazines	6.30	6.30
Mixed Paper	1.13	1.13
Tires	19.92	47.52	24.83	0	92.27
Compost	105	70	175
Total Diverted	350.24	290.91	343.66	247.20	1232.01
Waste	1188.57	1623.15	1610.06	2116.10	6537.88

The information contained was provided by Bennington Transfer Station Quarter Reports and local haulers. Information on curbside collection and commercial collection of recyclables is not included.

Hauler interviews did not glean more information to support more accurate numbers in the tables. A very detailed hauler and disposal review will be completed at the time the biennial report work is done for submittal.

Per Capita Disposal Rate

The per capita disposal rate was calculated based on the State of Vermont formula.

$$\text{Per Capita Disposal Rate} = \frac{\text{(total tons landfilled + total tons incinerated)}}{\text{total population of that Towns or district}} \text{ per yr in a given Towns or district}$$

(may be adjusted for seasonal population)

Per Capita Disposal Rate = $\frac{(6,537.88 \text{ tons of waste})}{16,557 \text{ approximate population for 2002}}$ =

$\frac{(6,537.88 \text{ tons for 2002}) \times (2000 \text{ lbs/1 ton}) \times (1 \text{ year} / 365 \text{ days})}{(16,557 \text{ estimated population for 2002})} = 2.16 \text{ lb/person/day}$

The current per capita disposal rate for Bennington is estimated to be 2.16 pounds per person per day. This rate was calculated based on the population information described in Section 2 of this Plan. Waste tonnage information for this calculation was attained from the Biennial Report for 2002 included in Attachment A.

Diversion Rate

The State has set the president to reduce waste generation and disposal by 50%, by the year 2005. It is, however, extremely difficult to define, measure, evaluate and monitor the reduction of waste to meet the 50% goal.

The State formula for calculating the Diversion Rate is as follows:

Diversion Rate (%) = $\frac{\text{tons diverted}}{\text{tons diverted} + \text{disposed}} \times 100$

Diversion Rate (%) = $\frac{\text{tons of waste reused} + \text{composted} + \text{recycled}}{\text{tons} + \text{reused} + \text{composted} + \text{recycled} + \text{landfilled} + \text{incinerated}} \times 100$

Information for this Section was attained from the 2002 Biennial Implementation Report in Attachment A of this Plan. Based on information that is currently tracked, the diversion rate for 2002 was calculated to be:

Diversion Rate (%) = $\frac{(1,232.01 \text{ tons})}{(6,537.88 \text{ tons} + 1,232.01)} \times 100 = 15.86 \%$

The diversion rate as calculated is an abstract calculation for the Towns. There are several waste streams that are extremely difficult to measure and track, such as reuse. It is difficult to account for materials that were reused that would otherwise have been waste. Compost is another waste stream that is difficult to track. It is currently unknown how many people in the Towns are composting organic wastes at their homes and thereby the amount diverted from the waste stream. Yard waste material accepted for compost at the landfill is also not tracked. The only “diverted” material that can be estimated is the recyclables; and that information is incomplete as described in the recycling rate calculation section.

Recycling Rate

The State formula for calculating the Recycling Rate is as follows:

$$\text{Recycling Rate (\%)} = \frac{\text{tons of waste recycled}}{\text{tons of waste recycled} + \text{tons of waste disposed}} \times 100$$

Based on information that is currently tracked, the recycling rate for 2002 was calculated to be:

$$\text{Recycling Rate (\%)} = \frac{(1,232.01 \text{ tons})}{(6,537.88 \text{ tons})} \times 100 = 18.84 \%$$

The recycling rate as calculated is also not an accurate reflection of the amount recycled for the Towns because it is difficult to measure. Residents of the Towns have the option of contracting with independent haulers for curb side collection of solid waste or utilizing the Bennington Transfer Station drop-off. Commercial, institutional, and manufacturing facilities in Towns also contract for collection. The amount of recyclables collected from the school is not weighed, therefore is only estimated. The amount of recyclables does not include recyclables collected from commercial facilities; however the amount of waste is the total amount for any waste hauler using the landfill from residential, commercial or institutional customers.

Reduce Waste Generation and Reduce Toxics Use

Source reduction and toxic use reduction are currently accomplished via public education (a) the Bennington Transfer Station and (b) newspaper advertising of HHW collection events. The Towns will attempt to further reduce waste generation and toxics use through increased education and awareness. The Towns will implement a program which will contain (at a minimum) the following elements:

- a. The Towns will make available at the Towns Clerk's Offices, and at the Bennington Transfer Station, relevant available printed information from the Agency of Natural Resources.
- b. Suitable information will be included in the annual report.
- c. The Towns will hold two well-advertised household hazardous waste collection events each year. At these events participants will be provided information about toxics use, reduction, and alternatives.
- d. The Bennington Transfer Station is in the process of permitting a building located behind the transfer station for a permanent HHW drop-off for items such as paints, thinners, and other household chemicals, thereby eliminating the need for HHW days for residents, as the collection would be on-going;
- e. The Towns will provide education to students in the public school system. The Towns believes that educating students will instill the importance of good solid waste management. This will enable children to take the information about waste reduction, reuse and recycling taught in the school into their homes, thereby educating their families. (See *Education/Information/Outreach Program* Section for further information.)
- f. Additionally, the Towns will use various local media including radio public service announcements, newspaper articles and advertisements, banners, or other "innovative public" methods. Although written materials can be easily distributed, the Towns feels

that other methods can be more effective in getting the public's attention such as a good article about the school recycling program established by the Solid Waste Advisory Committee that was published in the local newspaper. At a minimum, the Towns will send PSA's to two area radio stations to request announcement during the week prior to and on the actual day of HHW events. The PSA's will include brief, friendly general reminders concerning source reduction and toxics use.

Increase Reuse

The Towns will attempt to increase reuse of otherwise waste products through education and awareness. As listed above, there are several opportunities for the Towns to distribute information to the community. By using various forms of advertising, the opportunities to distribute information are various. These are, including, but not limited to the Towns Clerk's offices, the transfer station, handouts at various locations like store windows, countertops, local bulletin boards, and local calendar listings on the internet and the television.

There is an increase in "material reuse stores" throughout Vermont. Some consignment shops for clothes, architectural salvage stores or used furniture stores, etc. have developed in the Bennington - Woodford area. The Towns will support promotion of these businesses. Also, residents and businesses may contact VBMeX (<http://www.vbmex.net>) Vermont Business Materials Exchange for valuable resalable items. VBMeX is sponsored by the Vermont Agency of Natural Resources, and is a "free service whose goal is to minimize waste by fostering the exchange of reusable commercial resources".

In addition, the Towns will add a re-use zone component at the Bennington Transfer Station, where residents may leave household items in good condition after approval of the attendant, and from which other residents may take such items free of charge. The re-use zone will be modeled after other existing successful facilities in Vermont. Development of the re-use zone will consider location / convenience, overall user appeal, inventory organization / signage, screening / inventory management policies, and long term maintenance, and other needs / goals as applicable.

A schedule of implementation is as follows:

- ✓ Contact the transfer station operators to set up meeting to outline goals;
- ✓ Establish a timeline with the operators as to the location, operation, and permitting of such a "zone" within one year of the approval of this plan; and
- ✓ Have the Re-Use Zone up and running within 1 year of completed permitting and any agreements necessary with the operators.

Increase Residential Recycling Rate

The Towns are not considering a mandatory recycling ordinance at this time, but will continue to monitor the recycling rates at the Bennington Transfer Station, as well as another poll of towns' residents for hauler and use information. If, after the first biennial report is compiled and the numbers reflect a downward or even trend in recycling or re-use, the Towns will actively consider a mandatory recycling ordinance to further promote and meet the goals in this Plan.

The original Solid Waste Advisory Committee (Committee) contacted the haulers that service

the Towns and inquired about recyclables collection. In the process of developing this Plan the Towns sent a letter to all haulers requesting that they provide information on waste and recycling. Only a few haulers responded to the letter and provided the requested information. The Committee identified two major concerns that haulers had:

1. The distance to a recycle processing facility; and
2. Additional equipment may be required to collect the recyclables separate from waste.

Of these two concerns, it is known that at least 3 local haulers collect recyclables curbside within the two Towns. There exists one business which collects recyclables and uses the Bennington facilities. One hauler delivers its collected recyclables to one of its own facilities for processing. Two other haulers are known to take their collected recyclables to facilities just over the border into New York, one facility is only a half hour away, and another is an hour from Bennington. At present time, there is not enough room to include recycling processing within the confines of the building, so the processing avenues the haulers are presently are using are the outdoors and is the best means of recycling collection at this time. All haulers are welcome to use the recycling area provided at the Transfer Facility.

The Committee hoped to avoid an ordinance through education and increased recycling opportunities. The Committee believed that they could work with residents and businesses to increase awareness and consciousness rather than to force recycling through regulation. Efforts to review the effectiveness of increased efforts and evaluate the need for mandatory requirements will continue.

A review of the recycling operations will be conducted at the Bennington drop-off facility to make sure that the local recycling remains "customer friendly", ie is pleasant and easy to use, has good simple signage, has convenient driving / parking locations, and that required material preparation efforts are not unreasonable or unnecessary (if material preparation is perceived as cumbersome, this could deter use). The Committee will also consider market information/material preparation and disposition factors, to the extent relevant to the goal of increasing use. System and facility adjustments will be made as needed on an ongoing basis.

Increase the Seasonal Home/Resort Participation Rate

The Towns will seek to increase the seasonal home participation rate through education and convenience. The Towns believes that there are a minimal number of seasonal homes in Bennington, however when the homes are occupied the waste is either collected curbside or dropped at the residential drop-off. The Town of Woodford has a relatively high percentage of seasonal homes. Census data on these part-time residents was not available; however the Towns estimated that the seasonal population could easily be equal to or greater than the year-round population. It is believed that seasonal users do not influence dramatically the capacity of Bennington's facilities. Through public information distributed by the Towns; either newspaper, radio, brochures, pamphlets, mailings, etc., and other means of education for residents, year-round or seasonal, the Towns will promote recycling, waste reduction, reuse, and pollution prevention.

Increase the Commercial Recycling Participation Rate

In an effort to increase the commercial recycling participation rate, capture rate, collection efficiencies, and materials recycled, the Towns are attempting to work with the local haulers to offer recycling collection services. The Towns believes that education of residents will also encourage people to recycle at their business.

The Towns believe that if more local haulers offered recycle collection the commercial recycling rate would increase. If recyclables collection is not increased through education and opportunity, the Towns will consider instituting a mandatory recycling ordinance. The ordinance would include requiring haulers to offer recyclables collection with curbside waste collection for both residential and commercial customers. This alternative would require careful evaluation due to the impact on the smaller haulers that may not have equipment or the convenience of a processing facility. At the time of the first biennial report completion, a better idea of a needed recycling ordinance may be effective. Upon release of the biennial report, the Committee will meet and decide whether or not to proceed with steps leading to an ordinance. These will include communications with all haulers present in the communities, potential equipment deficiencies, etc. Upon culmination of necessary information, a final determination may be made as to the effectiveness of an ordinance.

The Committee or an appointed consultant will complete an analysis of the businesses in the Towns, their recycling needs, and opportunities to increase commercial participation rates, beginning in the year 2008 to be completed by the end of 2008. The analysis will include a phone survey of suspected primary generators. The survey will gather general information about material types and current disposal practices, in addition to contact information. The Committee will then send information about relevant available services/facilities to a contact data base, minimum once per year. It is anticipated that the information will be sent via email. For example, the information may include a link to the Vermont Business Materials Exchange website. See Section 10 for budget of this survey.

Increase the Institutional Recycling Participation Rate

In Bennington, all municipal facilities recycle. The "institutions" located in the Towns of Bennington and Woodford are the municipal buildings, schools and the recreation center. The schools currently have a recycling program in place. The Committee will include these institutions, in addition to public libraries, and the hospital, in the survey to be completed by the end of 2008. The institutions will then receive relevant information about available services / facilities minimum once per year, as a component of that outreach effort.

Prevention of the Incineration or Disposal of Marketable Recyclables

The Towns believe that there are several factors to preventing the incineration or disposal of marketable recyclables; the first is ample opportunity for accessible convenient collection; the second is through education; the third is through purchase of recycled products.

The first factor; through the drop-off available at the transfer stations for the residents in Bennington and Woodford have an opportunity for convenient discard of many recyclable materials. The drop-off is open 6 days per week, as early as 8 am, thereby allowing customers ample opportunity for accessible convenient drop-off. The Towns prohibit burning

in general, and has enforced this ban successfully through the Health Officer and the Fire Wardens.

The second factor; is to encourage education through public awareness. The Towns are working with the schools to promote education of recycling, reuse and waste reduction and HHW reduction.

The third factor in preventing the incineration or disposal of marketable recyclables is through promotion of buying recycled products. The marketability of any recyclable material is dependant on the demand for that product. Buying recycled products will increase demand for the materials used in making the new product.

The fourth factor is the creation of nearby markets. Here the State of Vermont should play a key role, utilizing its economic development offices to assist with prospects.

Increase Construction/Demolition Debris Reduction, Reuse and Recycling

The Towns believes that through the promotion of any local reuse businesses, including architectural salvage companies, some construction materials that would otherwise be C&D waste could be averted from disposal. The Solid Waste Advisory Committee will investigate possible avenues for construction debris reuse through non-profit organizations. Currently C&D waste disposal is available at the Town Transfer Station where it can be transferred to Adirondack Resource Recovery in Hudson Falls, NY; North Country Environmental Services, Inc. Landfill in Bethlehem, NH; Clinton County Landfill in Schuyler Falls, NY; and New England Waste Services of Vermont, Inc. Landfill in Coventry, VT via transfer trailers. C&D disposal is also available at the Burgess Brothers facility, as well as the Shaftsbury Transfer Station in Shaftsbury, VT. The minimum annual communication to the commercial and institutional database will include relevant information on reduction / reuse / recycling of C&D wastes, including links to available state of Vermont websites.

Also, residents and businesses may contact Vermont Business Materials Exchange (VBMeX) [<http://www.vbmex.net>]. VBMeX is sponsored by the Vermont Agency of Natural Resources, and is a “free service whose goal is to minimize waste by fostering the exchange of reusable commercial resources.”

Other means to increase construction and demolition reuse and recycling are:

- Obtain a copy of the Construction Site Reuse & Recycling Guide
- View the website <http://www.anr.state.vt.us/dec/wastediv/recycling/candd.htm>
- Take untreated and clean wood to Waste USA
- Contact Habitat for Humanity for any possible donatable materials
- Used building stores like Recycle North and Recover Burlington

Increase Organic Waste Recycling

Organic wastes include leaf/yard, food waste, brush, stumps, and appropriate papers. Currently, there is a yard waste composting pile available at the Bennington Transfer Station. This is available to residents of Bennington and Woodford free of charge and to lawn care businesses at rates much less than disposal rates. Residents are able to bring in leaf and

lawn clippings, stumps and brush for their disposal. There are two separate areas, one for leaf and lawn waste piling, and another for stumps and clean wood, of which this pile is chipped once it gets to a considerable size. The chipped wood is then available for residents and businesses to take for their own use.

The information printed in the annual Towns reports will encourage composting, and the minimum yearly communication to the commercial / institutional database will encourage composting.

Education/Information/Outreach Program

The Solid Waste Advisory Committee will develop an involved waste diversion education/information/outreach program.

Currently, printed information available from the Agency of Natural Resources is available at the Towns Clerk's Offices, and the Towns Transfer Station Residential Drop-off.

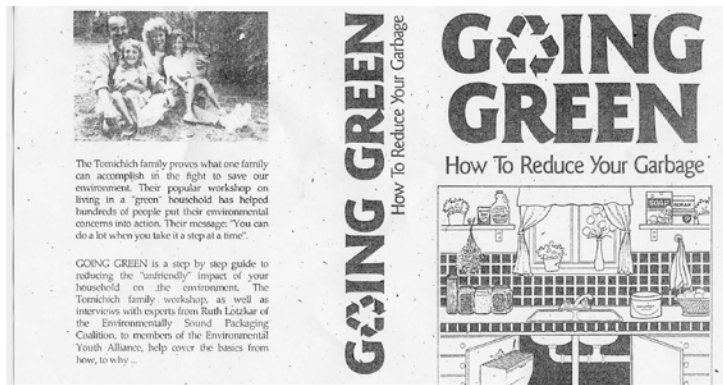
The Towns holds two household hazardous waste collection events each year, and with the initiated permitting of a permanent residential household hazardous waste drop-off depot at the transfer station, this will aid residents in both Pennington and Woodford in their knowledge of toxics in the home.

The Towns believe that educating students will instill the importance of good solid waste management, and bring information into homes through the children. In that vein, the Towns of Bennington paid two individuals to film, produce, and develop two instructional/informative videos which are now available to schools. Both targeted elementary school students, and displayed current school programs, a visit to the MRF (Material Recovery Facility), and how to recycle at the Bennington Transfer Station.

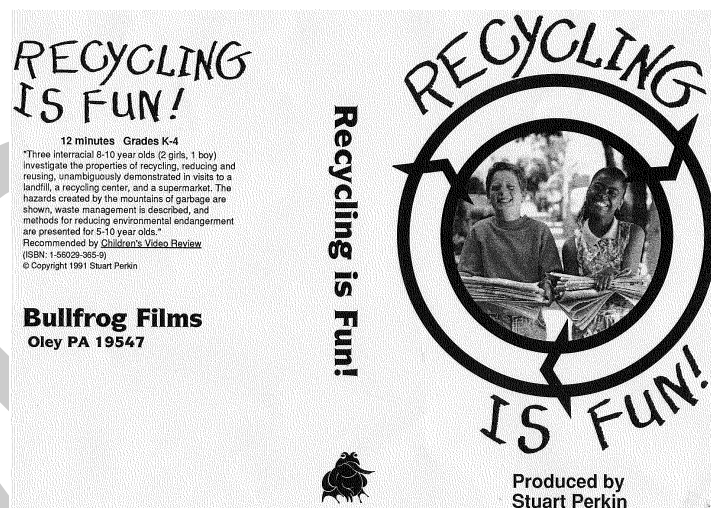
In addition, the Rutland Material Recovery Facility, owned by the Rutland County Solid Waste District, operates a visitor center in the MRF for learning activities, and viewing the Facility during operation.

The Committee will develop and implement a program which will target mostly elementary school children, with additional outreach to middle and high school students. The program may involve:

- a) Purchase / borrow and showing of the following instructional video tapes which are published by Bull Frog Films (it is noted that the video tapes are available for short-term loan to anyone, free of charge, by calling NEWSVT at (802) 334-8300).
 - Here's My Question: WHERE DOES MY GARBAGE GO? (Grades K-5)
 - It's Gotten Rotten
 - Going Green, How to Reduce Your Garbage (Grades 5-Adult)



- Planet Neighborhood, Wetlands Technology (Grades 5-9)
- Planet Neighborhood, The Car
- Recycling Is Fun! (Grades K-6)



- Interactive learning through field trips is a very effective tool for educators. Field trips to a waste management facility will be considered.
- Use of educational performers when environmental / waste theme show is available.

The population data (Attachment C) shows that there were 4,357 persons aged 0-19 living in Bennington and Woodford at the time of the 2000 census. Approximately 75% or 3,000 of these persons would be school-age. The goal of the school-based education program will be to reach 1,000 students per year (i.e. each student once every three years), via one of the listed activities or by other suitable means.

In addition to the school-based initiative, as previously described, the Committee will develop and implement a multi-faceted minimum yearly communication to the communities.

SECTION 4. BIOSOLIDS AND SEPTAGE MANAGEMENT

According to the Revised State Plan, Section II, Critical Issue 7, Towns need to develop an action plan for the management of septage (septic tank pumpings) and biosolids (wastewater treatment plant sludge) generated in the municipality:

Biosolids and Sludge

The wastewater collection system gathers the Towns' wastewater for treatment at the Bennington Wastewater Treatment and Composting Facility. The Towns currently composts anaerobically digested sludges for resale. Composting is the best option and most cost-effective, long term solution for handling of sludge and septage. The Towns produced 2,054 cubic yard of compost in 2002 (see Towns Report excerpt in Attachment D). The Towns of Bennington facility also serves neighboring communities (see Attachment J), and this may continue, at the Towns of Bennington's discretion. In the event of an unplanned event such as equipment breakdown, which would cause the composting / resale facility to become temporarily or permanently unavailable, the Towns will dewater and landfill the sludge at appropriate facilities. The Towns successfully operated in this manner when its compost facility was destroyed by fire in 2003.

Septage

The Bennington Wastewater Treatment Facility is located in the Town of Bennington. The Towns' wastewater treatment facility produces residual biosolids which are currently managed via compost sales. The Towns contracts with ALLGRO, a Massachusetts-based company which markets the compost throughout New England. The remainder of the Towns' population is served by private on-site septic systems. Homeowners and other facilities not connected to the municipal wastewater system have the availability of using septage hauling services

Independent Septage Haulers Include, but are not limited to:

Church Septic Tank Service
 Dorr Septic Systems Co.
 Houghton Sanitary Service, Inc.
 Mike Szymanski

ACCEPTABLE MANAGEMENT OPTIONS FOR SLUDGE AND SEPTAGE	
Management Option	Check if Acceptable
Land Application	<input type="checkbox"/>
Composting or Further Treatment to Qualify for Distribution	<input checked="" type="checkbox"/>
Landfilling or Use as Landfill Cover (both require dewatering)	<input checked="" type="checkbox"/>
Incineration	<input type="checkbox"/>
Regional septage receiving and/or treatment facility	<input type="checkbox"/>
Other wastewater treatment plants	<input checked="" type="checkbox"/>

The Towns believes that the strongest tool in proper waste management is education. Public outreach and education will be concurrent with the programs outlined in section 3, which include a program within the school system. The Towns minimizes contaminants in biosolids by offering household hazardous waste events to residents and businesses.

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SECTION 5. HOUSEHOLD HAZARDOUS WASTE, CONDITIONALLY EXEMPT GENERATOR WASTE, LANDFILL BANNED AND SPECIAL WASTE PLAN

The Towns recognizes that household hazardous waste, conditionally exempt generator waste, landfill banned, and special wastes are categories that require additional education and collection options.

Definitions

The following definitions are as printed in the State of Vermont Solid Waste Implementation Plan Guidance Document and are reprinted here for reference to the Plan.

Household Hazardous Waste (HHW): HHW is a solid waste generated by a household that has some of the characteristics of hazardous wastes. These characteristics include wastes that are ignitable, corrosive, reactive and toxic. Automotive fluids and batteries, household chemicals (such as toilet bowl cleaners, bleach, pool chemicals, etc.), oil-based paint, mercury, and electrical products with hazardous components are some examples of HHW that is generated by households. The Solid Waste Rules (effective date January 15, 1999) define HHW as waste that would be subject to regulation as hazardous waste if it were not from households.

Conditionally Exempt Generator Waste (CEG Waste): CEG Waste means hazardous waste generated (typically by a business or institution) that is conditionally exempted from certain provisions of the Vermont Hazardous Waste Management Regulations. CEG's must generate less than 220 pounds of hazardous waste, or 2.2 pounds of acutely hazardous waste and CEG's must not accumulate more than 2200 pounds of hazardous waste or 2.2 pounds of acutely hazardous waste at any time. CEG's must handle and store all wastes properly. This includes placing materials in compatible containers, properly labeling them, and storing them under cover and securely.

Special Wastes: Special Wastes are categories of solid waste that pose special environmental, health or safety concerns or have certain characteristics (e.g., size, composition) that cause problems in handling or management. The Solid Waste Management Rules (effective date January 15, 1999) designate asbestos waste, regulated medical waste, CEG waste, liquid wastes, and liquid containers with a capacity of 30 gallons or larger. Other wastes that may require special handling include tires, household hazardous waste, industrial sludges, bulky wastes, and large appliances.

Landfill-Banned Wastes: Landfill banned wastes are solid wastes that have been banned (by statute) from landfills in Vermont. These include:

- waste oil,
- white goods (washing machines, dryers, refrigerators, ranges, etc.), tires,
- paint (including paint thinner, remover, stains, varnishes, but not solidified latex paint),
- lead-acid batteries,
- nickel-cadmium (NiCad) batteries,

small sealed lead acid batteries,
non-consumer mercuric oxide batteries,
and labeled mercury-added consumer products.

Mercury-added consumer products include but are not limited to:
thermostats,
thermometers,
manometers,
barometers,
and switches.

Mercury-added switches include, but are not limited to:
tilt switches,
flame sensors
and thermocouples.

Statute (Title 24 V.S.A. Section 2202a) outlines the following priorities for municipal HHW/CEG/special waste plans:

- § *Reduce or eliminate the use of hazardous or toxic substances;*
- § *Reduce the generation of hazardous waste;*
- § *Proper management of HHW/CEG waste; and*
- § *Reduce the toxicity of the waste stream.*

Education on HHW and Landfill Banned Materials

The Towns believe that education is the primary tool to proper waste management. In an effort to reduce the use of hazardous or toxic substances, the Towns have brochures and publications available through the ANR, offered at the Towns Clerk's office. The Solid Waste Advisory Committee will work with the school system to increase awareness of hazardous substances and proper management options. HHW education will be concurrent with the education/outreach outlined in section 3.

These educational programs will encourage and teach people the reduction in the use of household hazardous waste, and its proper disposal. To encourage the proper disposal of both residential and CEG hazardous wastes, the biannual HHW events establish these systems. Members of the communities have access to these events, and residents and small businesses are not charged for the materials brought to the event. The Bennington Transfer Station is permitting a permanent HHW drop-off depot in a building located at the rear of the transfer station area. This depot will allow residents to leave their household hazardous wastes at any time the depot is open. The goal is to possibly eliminate the need for the biannual events. The transfer station collects on a regular basis, many other items that generators desire to get rid of, so that any special collection days are not foreseen to be needed. The Committee will review this need in the year 2008.

The HHW collection events sponsored by the Towns offer an opportunity to distribute informational material to event participants. There are many publications and internet sites on toxic waste reduction and alternate "natural" cleaning products that are provided at the events. In addition, related information will be included in the minimum yearly communication to the Communities.

Managing HHW, and Landfill Banned Materials and Special Wastes

Ensuring that residents and businesses have available opportunities for collection of special wastes, landfill banned material and hazardous waste is also critical in the reduction of toxicity in the waste stream and proper waste management. The Towns currently have opportunities for collection of many special wastes at the Bennington Transfer Station. Table No. 2 identifies the materials and where opportunities are available for collection.

The residents have hazardous waste collection available through regular HHW events. The events are coordinated by the Towns and held twice annually at the convenient local drop-off facility in Bennington. The advertising includes radio announcements and newspaper ads. The Towns contract with a licensed hazardous waste company for the collection event and removal of wastes. In 2003, there were total 281 customers / users at the HHW collection events. The Towns will continue to hold minimum two collection events per year. The Committee will evaluate the overall efficiency of the collection events on an annual basis. In the event the Committee recommends longer duration or more frequent events as an effective means of improving participation, this will be implemented on a trial / performance basis.

In the summer of 2007, plans to permit the empty cinderblock building behind the transfer station are under way. This building will collect and house residential HHW collected. Frequency of being open has not yet been determined, and will be done so once the ability to have the HHW Depot is final. Once the depot is running, plans to eliminate biannual HHW events will be under way.

Household Hazardous waste management education is in the schools. Children are taught through science and social studies curriculums, the ever changing needs of the environment, including pollutants and toxics and landfilling.

Besides contacting the Agency of Natural Resources, there is a broad range of materials and websites available to the teaching community; listed below are just some of the ideas that can be utilized:

- Brochures and handouts
- Rental of videos from NEWSVT facility
- Promote and hold Earth Day and Earth Week <http://www.earthday.net>
- Promote and participate in Vermont's Green Up Day
- Promote America Recycles Day http://www.anr.state.vt.us/am_recyc/index.htm
- Check out the Teachers Resource site on the EPA website at <http://www.epa.gov/epaoswer/osw/index.htm>
- Various reduction and recycling information on the Agency of Natural Resource's website, starting at <http://www.anr.state.vt.us>

Five Year Commitment Goals for HHW

- Reduce the amount of Latex paint brought to the events by means of education.
- Improve Advertising
- Improve Education
- Encourage CEG's/SQG's to attend

- Handouts outlining acceptable event materials; other disposal options

The Bennington Transfer Station has a Facility Management Plan document as required of their solid waste facility certification that outlines the waste acceptance procedures at the facility including a waste review procedure. The operators are known to pull unacceptable waste items out from the waste found on the tipping floor, and are placed in a 55-gallon barrel just for these types of items. They are usually then disposed of at either certain HHW events, or taken to the proper facility for disposal. Residents are generally warned about unacceptable items.

Outreach to haulers will entail only the advertising and local information that is provided for all residents and commercial businesses. Haulers will be notified if a major change such as a price increase or material change is made, by the operators of the transfer station. The Committee will work with the operators to create individual mailings if necessary to notify haulers of changes and planning needs for the Plan. Any changes in waste and recycling issues are already posted at the transfer station and are included on any handouts if necessary for notification purposes.

Conditionally Exempt Generators (CEG's)

The Solid Waste Advisory Committee will assist CEG's by providing businesses with current waste management information and making HHW collection events available to them. The HHW collection events are held biannually for residents of Bennington and Woodford at the Bennington Transfer Station drop-off. Posted notices of the events and advertising in local newspapers and radio clearly state that businesses are welcome, but are responsible for scheduling directly with the hazardous waste contractor.

The Committee will continue to assist businesses by providing current information and any assistance possible as requested to include promotion of the Environmental Assistance Division (EAD) staff and programs. The household hazardous waste collection events will continue to be open to businesses provided they contact directly with the contractor and pay for waste disposal directly.

The Committee will also evaluate the effectiveness of completing periodic mailings to the possible generator businesses listed in Section 2. The Committee may send appropriate literature to any or all businesses, targeted randomly or by business type, at the discretion of the Committee, if the Committee determines this would be an effective tool and wise use of available resources.

It is also noted that there is a Vermont Agency of Natural Resources Procedure addressing the handling and treatment of regulated medical waste (June 2001). In the event Committee members receive inquiries concerning medical wastes handling, reference will be made to the State of Vermont procedures and regulations. Reference is also made to the Vermont Department of Health asbestos control regulations, including requirement for disposal at asbestos-approved landfill facilities.

OTHER SPECIAL WASTES

Large Dead Animals:

Because the Towns have a few farms, there are a number of other wastes generated on site not typically taken into account. A number of animal mortalities take place on these farms. The management of this kind of waste can be handled through a renderer out of Ellenburg, New York. This is the alternative to on-site burial of animals.

Should a crisis arise in Bennington or Woodford, such as the foot-and-mouth disease in England, there are various disposal facilities such as WSI Landfill in Moretown, VT and Waste USA Landfill in Coventry VT that could be called upon as a proper disposal site for animals. Through special procedures with the ANR, the landfill could handle this problem for on-site burial.

Asbestos and non-friable asbestos:

Asbestos waste can be taken care of by properly disposing of in a certified landfill in accordance with federal and Vermont State Rules and Regulations. Contact should be made with the Vermont Department of Health (<http://www.healthyvermonters.info>) 802-863-7200 or 800-464-4343 (from within Vermont) and a review of the asbestos control regulations before beginning any project.

As list of asbestos abatement contractors can be obtained by calling the Department, or logging on to the internet and going to the following website:

<http://www.healthyvermonters.info/hp/asbestos/asbestoscontractor.shtml>

Waste USA and WSI landfills are the only facilities in Vermont approved to take non-friable asbestos containing waste (e.g. roofing or siding shingles) and limited quantities of friable asbestos waste (less than 10 cubic yards per project) that is properly contained at the job site.

The Towns also offers asbestos disposal, in small amounts, during its HHW collection events as well.

Regulated Medical Waste (households):

Home generated regulated medical waste is medical waste that has not been administered by a visiting health care service or professional. It can be disposed of in the landfill without any prior treatment, provided the resident follows the following excerpt from the Handling and Disposal of Home Generated Regulated Medical Waste below:

- (a) Sharps should be placed in a hard plastic, opaque container such as a detergent bottle;
- (b) Containers may be placed in the regular household trash;
- (c) All other medical waste, such as bandages, dressings, etc. should be placed in a separate container and disposed of in the regular household trash.

Regulated medical waste generated from businesses or medical facilities must be treated as per the Regulated Medical Waste Procedure, which can be provided by the Solid Waste Liaison.

According to the Revised State Plan, Section II, Critical Issue 8, Towns need to ensure that Vermonters are provided with safe, affordable, and convenient collection opportunities for HHW and Special Wastes. The following Table No. 2 identifies the collection sites.

Table No. 2		
<i>Current Collection/Drop-off Locations for HHW and Special Wastes</i>		
Waste Type	Location	Cost to User
Waste Oil	Town Transfer Station - limit on quantity, must be clear of contaminants	\$0.25/quart
Oil Filters	Biannual HHW events; local garages; transfer station	Free**
Tires	Town Transfer Station Residential Drop-off	\$3 to \$5 each
Antifreeze	Biannual HHW events; permanent HHW depot.	Free**
Pesticides	Biannual HHW events; permanent HHW depot.	Free**
Household Chemicals	Biannual HHW events; permanent HHW depot.	Free**
Paint/Related Wastes	Biannual HHW events; permanent HHW depot.	Free**
NiCad Batteries	Biannual HHW events; permanent HHW depot.	Free**
Lead-Acid Batteries	Town Transfer Station Residential Drop-off	Free*
Florescent lights/ballasts	Biannual HHW events; permanent HHW depot.	Free**
Consumer Electronics (Computers/monitors)	Equipment containing mercury are accepted at biannual HHW events; electronics collection is located at the transfer station	Free**
White Goods	Town Transfer Station	\$7 to \$10 each
Asbestos (Non-Friable)	Town Transfer Station - restricted handling and packaging. May use biannual HHW events.	Direct Haul Availability
Medical Wastes	Biannual HHW events; permanent HHW depot.	Free*
Mercury-added Products	Biannual HHW events; permanent HHW depot.	Free**
Dead Animals:	Town Transfer Station - with limitations at the discretion of the landfills.	Charge per ton

All household-generated waste is categorically exempt from regulation as hazardous waste.

Most business-generated electronic waste is subject to regulation as hazardous waste.

**Household Hazardous Waste Collection Events are paid for by the Town for residents, there is no cost to residential users.

Note: see rate sheet in Attachment E.

As required by 24 V.S.A. Section 2202a(c)(4), the Towns has developed a plan for each element of HHW/CEG/Special Waste/Landfill-Banned Wastes.

SECTION 6. UNIT BASED PRICING PLAN FOR MSW

Currently there are financial incentives for waste reduction, reuse, recycling and composting through the facilities open to Bennington residents and businesses. The Towns have evaluated the pricing structure to ensure it provides an economic incentive for the generators to minimize waste. In addition the Towns have evaluated possible measures to improve the current system.

Evaluation of Current Pricing Plan

The Towns encourage and support unit based pricing, but also recognize individual's rights to decide how best to pay for waste management costs. Most solid waste disposal options within the two Towns currently provide incentive to reduce, reuse, and recycle.

Various haulers provide trash and recyclables collection to commercial and residential customers. Also offered are containers for special wastes such as demolition jobs, and special waste jobs such as asbestos waste removal. Haulers are no longer required to be registered with the Town of Bennington; therefore, a list of haulers other than the widely known Casella Waste Management, Inc. has not been obtained. Since haulers do not have to report quarterly tonnage information to the State of Vermont, it is unknown how many haulers are operating in the area, and where all the solid waste is being taken. An extensive poll of haulers, fast-trash services, their prices and resident's solid waste behaviors is being conducted in the Fall of 2007 so that the first required Biennial report may be more complete with more known information.

Currently, the cost for trash services at the Bennington Transfer Station is \$3 per bag at the residential drop-off area, and \$110 per ton at the transfer station building for large loads. Rates charged for residential curbside collection ranges from \$2.50 per 30-gallon bag to \$3.50 per 30-gallon bag, as well. Most pay-per-bag drop-offs in the area are estimated to be in a range anywhere from \$2.50 per bag to \$3.50 per bag.

Haulers bring waste and recyclables to various collection and disposal facilities in Vermont, New Hampshire, and New York. Those haulers that collect recyclables typically transfer at the County Waste Facility in Albany, New York, and at Green Mountain Disposal in Scatacook, New York. Again, after the Fall of 2007 poll is completed, hopefully a greater amount of information will be known as to the destinations of recycling.

Both waste and recycling for many materials are available to residents and businesses at the Bennington Transfer Station, where unit-based pricing is in effect. A current rate sheet is available as a handout for users (see Attachment E). Waste is accepted by the bag for a fee, and recyclables are free of charge. Yard waste is also accepted free of charge for residents and at a rate less than MSW for landscaping-type businesses.

Unit Based Pricing Action Plan for Improvements

The Towns believes that the convenience of recycling services provided at the Bennington Transfer Station residential drop-off, with the current pricing plan, as well as the cost for curbside service is encouraging to residents to utilize this service, and meets the definition of unit based pricing.

SECTION 7. CLOSING THE LOOP

Closing the loop is about buying products made from recycled materials and finding beneficial reuse for materials so that natural materials could potentially be salvaged. The effect of recycling is a cyclical one, end markets need to be available for recycled materials in order for it to be effective. Uses and reuse for many recycled materials are constantly being researched and experimented. Some examples of beneficial reuse of materials include pilot projects where crushed glass and tire chips were used as road base material or drainage material for leach fields. These uses are not dependent on the consumer purchasing products in the retail market, but would provide a use for a “recycled” product and conserve natural materials that would be used instead.

The Towns will support and participate in any State funded program for buying recycled materials, or any experimental programs for beneficial reuse of materials.

The Solid Waste Advisory Committee will promote the importance of “closing the loop” through education programs.

Through the HHW Events, information is distributed to participants and will include information about recycled products.

Relevant available information will also be distributed via the school-outreach program (handouts for students to take home to their parents), and distributed via the minimum yearly communication to commercial and institutional generators.

Historically the EPA and other larger-scale organizations have used television commercials and other media opportunities to educate and encourage consumers to purchase products made with a high content of post-consumer recycled material. The Towns would strongly support ANR funding of a similar regional effort.

The Towns is “doing its’ part” in closing the loop while also encouraging-by-example. The Towns of Bennington purchases bulk recycled paper products (ie paper towels, toilet paper, etc.) made from recycled material for the Towns operated facilities.

SECTION 8. MANAGEMENT OF ILLEGAL DISPOSAL AND WASTE BURNING

In the past illegal disposal and illegal burning have been issues. The Towns makes an effort to educate and inform residents and businesses of the available proper disposal and recycling opportunities. Residents have a convenient local drop-off facility, and recycling available free of charge, which provide incentives to manage wastes properly. In addition, an ordinance is in effect in Bennington and provides a legal deterrent to illegal disposal and burning of trash. The ordinance is provided in Attachment F.

The following list of materials is accepted at the Bennington Transfer Station residential drop-off. Through the Host Community Agreement with the Towns Transfer Station, Bennington residents are allowed the following services:

- Household MSW
- Household recyclables
- Waste tires
- Lead-acid batteries
- Waste oil
- Yard Waste Composting
- White Goods, Metals, and Appliances
- Construction and Demolition Debris
- Other Bulky Wastes
- Electronics (computers and components)

Because there are adequate disposal and recycling opportunities available to the residents, the Towns feel that the financial and convenience aspects of the issue have been addressed.

The Towns have had few complaints about illegal waste burning. If the Towns become aware of an illegal burning incident, the Health Officer or Fire Warden will contact the person responsible and provide education about waste burning and proper disposal options. Repeat offenders will be penalized in accordance with the ordinance.

The Towns may solicit assistance from the Enforcement Division of the Agency of Natural Resources at their discretion.

Continuing education for illegal burning will be a part of any mailings and informational brochures that are on display at the transfer station, mailed to residents quarterly and annually, as well as a display at the Town Offices.

Evaluation of the convenience of proper disposal for wastes generated in Bennington and Woodford:

TABLE 3 EVALUATING CONVENIENCE			
TYPE OF WASTE	CONVENIENCE		
	furthest haul distance	days & hours of operation	cost to user
Residential MSW	Town Transfer Station Typical max. 5 miles Approximately 10 miles from the furthest point in the Town of Woodford	The drop-off at Town Transfer Station is open from 8:00 am to 1:00 pm M,T,Th,F,S and 8:00 am – 5:00 pm on Wednesday	\$2- 6.50/bag
Construction/demolition debris	Town Transfer Station same as above	Same as above	\$130/ton
	Burgess Bros. Landfill same as above	M,W,F 7-3:30	\$70/ton
Tires	Same as above	Same as above	\$3-5/each
White goods	Same as above	Same as above	\$7-10 / item
Recyclables	Same as above	Same as above	Free

Note: see rate sheet in Attachment E

The evaluation of the current system has concluded that there are ample opportunities and incentives for residents and businesses to properly dispose of wastes at a reasonable rate. The Towns do not believe there is currently an issue of illegal disposal or burning as a result of the current waste management system due to the many items allowed free of charge at the drop-off.

The public outreach efforts via the schools and via the information published in the annual Towns report will include relevant literature / reminders.

SECTION 9. EXISTING SOLID WASTE FACILITIES

Should any public or private entity propose to construct a solid waste facility in the Town, the entity will be required to submit a request and proposal to the Boards for review and approval. The Towns must include the facility in the SWIP prior to the submittal of an application for the facility to the Agency of Natural Resources. All applicable State regulations must be met. Any facility that qualifies for a Categorical Certification under the Solid Waste Management Regulations is acceptable under this SWIP.

The Towns of Bennington and Woodford have chosen not to adopt siting criteria for solid waste facilities at this time, although before the SWIP is adopted, these criteria will be reviewed once again.

The following is a list of the existing solid waste facilities located within the two towns, and thereby included in our Solid Waste Implementation Plan.

Existing Facilities

Bennington Transfer Station

Residential Drop-off
Houghton Lane, Bennington, Vermont

Burgess Brothers

C&D Landfill
Bennington & Woodford, VT

Bennington Biosolids Composting Facility

Bennington, Vermont

Currently in the Towns of Bennington and Woodford, there is a solid waste transfer station residential drop-off, as well as a C&D debris landfill existing in Bennington and Woodford. The Town of Bennington currently contracts with the private sector for facility operations.

As other waste facilities may develop in the Towns, the Selectboards will amend the Plan to include such new facilities.

Process for Solid Waste Facility Inclusion into the Plan

If any public or private entity proposes to construct a solid waste facility in the Towns, the entity will be required to submit a request and proposal to the Boards for review and approval. The Solid Waste Advisory Committee members will assist with coordination to facilitate the Selectboard's review.

Step 1: The entity is required to submit a letter to the Selectboards and Solid Waste Committee describing the proposed facility, including all relevant information, and how the facility proposes to meet or exceed the goals of the SWIP. If the facility is exempt from Solid Waste Certification by ANR Rules, the entity should so state in the letter and provide evidence of such (e.g., exempt recycling facilities).

Step 2: The request will be reviewed for inclusion in the Solid Waste Implementation Plan by the Selectboards at the next available Selectboard meeting. If the

Selectboards determine that the request is lacking in relevant information, the Selectboards will request additional information from the proposing entity.

Step 3: When the Boards are satisfied with the facility description, a public meeting, adequately warned, to obtain public input on including new facilities is required. This public meeting can be held as part of the regularly scheduled Selectmen's meetings. The Boards can vote to approve the facility's inclusion into the Solid Waste Implementation Plan and revise the Plan as necessary.

Once the decision is made to revise the SWIP, this Section and table below will be revised by the Board to include a new solid waste facility in the SWIP. This revision will be made after the review, public participation and approval process as outlined in this Section of the SWIP is completed and the decision to include the facility has been made.

Vermont State Statute requires the Agency of Natural Resources to issue Solid Waste Management Certifications for solid waste facilities only if the facility is included in the appropriate SWIP.

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SECTION 10. BUDGET AND TIMELINE

As with many Vermont Towns the tax base is the primary source of funding for any waste management program.

Many of the existing waste management services described in this Plan are provided to the Towns via contract with the private sector.

TABLE No. 4 BUDGET AND TIMELINE			
ACTION STEP	FREQUENCY	NEXT SCHEDULED or COMPLETE BY	\$ OR PERSONNEL (indicate if it is a one time expense, annual, etc.)
Education	On going	On going	Solid Waste Advisory Committee – Budgeted Annually
Permit a permanent HHW drop-off depot building at transfer station	2007-2008	Casella Waste Management, Inc.	\$800 for 40-hour OSHA training 1 staff member; \$500 for HHW contractor for set-up and on-site education
HHW Collection Events	2 x per year	Spring & Fall	Through Towns coordination – Budgeted Annually
Waste Ordinance	In Place	Ongoing	Selectboard
Printed information at Towns Clerk’s Offices	Updated Annually	Fall 2007	Through requests of ANR
Provide assistance to school system to educate students on solid waste practices	As needed	On-going	Will be completed by schools
Promote “RRR” to the public on a regular basis, 2x per year through media opportunities	Spring 2008	On-going, Spring 2008	Unbudgeted; will be completed by either Committee member or consultant

Contact local haulers to inquire about recycling and waste information – second inquiry	Fall 2007/Spring 2008	On-going	Through efforts of Consultant after SWIP approved
Direct mailings	Spring 2008	Spring 2008	Unbudgeted, will be completed by either Committee member or consultant
Special Days: Green-Up, Earth Day, Earth Week, America Recycles Day coordination	Ongoing	Ongoing	Selectboards/Committee Staff
Promotion of C&D recycling and reuse	Spring 2008	Spring 2008	Unbudgeted, will be completed by either Committee member or consultant
Business Analysis	Once during Plan duration	Year 2008	Selectboards Staff
CEG Information for Businesses	Spring 2008 (after SWIP is approved)	Same	Unbudgeted; through efforts of consultant or by Committee
Promotion for consignment shops and lawn sales	On-going		Word of mouth; printed materials; newspapers
Increase Recycling Collection by Hauler	If Needed	Investigate Implementation within 1-2 years	Solid Waste Advisory Committee / Selectboard

SECTION 11. PUBLIC PARTICIPATION IN PLAN DEVELOPMENT

This Plan was initially drafted by the Town's Selectboard and the Solid Waste Advisory Committee with assistance from Casella Waste Management, Inc. As with any Municipal Plan, the direct input of the residents, businesses and industry that it affects is vital to the success of the Plan. The following is the process for public participation:

- A "NOTICE" informing residents that the "Draft Revised Plan was available for review at the Towns Clerk's office" was posted at the Towns Clerk's office and the local post office. The "NOTICE" was also sent by direct mailing to residents;
- All revisions were incorporated into the initial draft Plan and submitted to the Agency of Natural Resources for review and approval.
- Once the draft SWIP is pre-approved, the Plan will be posted on the Town of Bennington's website; copies will be displayed at both Town Clerk's office; copies will be available upon request;
- Upon pre-approval of the Draft Plan, the Towns will schedule two public hearings, adequately warned to allow additional review by interested parties and public input prior to Plan adoption;
- If revision of the SWIP is necessary, the public has the opportunity to participate in a publicly warned meeting to discuss the proposed changes;
- After the SWIP is approved the Towns will implement the plan at which time the Solid Waste Committee will continue its work in the education of residents and increase community participation in the Town's solid waste programs. It is known that citizen participation and assistance can lead to greater program success, so the Town will welcome and encourage public participation in community events.
- The Towns of Bennington will make additional efforts to recruit new SWAC members (who are not current Selectboard members), on or before December 31, 2007. The committee and availability of positions will also be announced at the public hearings. The final SWIP, and any amendments, shall include a brief summary of critical public input received and considered during plan development.



SECTION 12. CONFORMANCE WITH OTHER PLANS

As required by Vermont Statute this Revised SWIP must be in conformance with any municipal and regional plans adopted in accordance with 24 V.S.A. Chapter 117.

The Towns of Bennington and Woodford are members of the (BCRC) Bennington County Regional Commission include all of Bennington County except Readsboro, Searsburg, and Winhall. Adopted May 23, 2002, The Regional Plan addresses Solid Waste and Wastewater Treatment planning for the region (see Attachment C). The Regional Plan notes the existence of the Bennington transfer station and discusses the need for this SWIP update, hence this SWIP is in conformance with the Regional Plan.

This SWIP was developed specifically for the Towns of Bennington and Woodford to ensure that the Towns' needs and goals for waste management are satisfied. The Town of Bennington Plan, adopted December 12, 2005, notes the existence of the Bennington transfer station, and its private sector contracted operations (see Attachment G). The Town of Woodford Plan, adopted October 2002, states that Woodford does not have its own facilities, and that residents / businesses take responsibility for transport to the Bennington Transfer Station, consistent with the SWIP (see Attachment H).

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ATTACHMENTS

Attachment A	Biennial Implementation Report for 2002
Attachment B	Center for Rural Studies Social and Economic Indicators for the Towns of Bennington, Vermont
Attachment C	BCRC Plan
Attachment D	Towns of Bennington Annual Report 2002
Attachment E	Bennington Transfer Station Handouts and 2002 Rate Sheet
Attachment F	Ordinance Regulating the Collection, Transportation, and disposal of Solid Waste for the Towns of Bennington, Vermont
Attachment G	Letter from disposal sites for waste disposal
Attachment H	Bennington Towns Plan excerpts
Attachment I	Woodford notes and Towns Plan excerpts
Attachment J	Bennington WWTF Septage Origin by Towns – 2002
Attachment K	Yellow Pages Highlighted CESQG Businesses

ACKNOWLEDGEMENTS / REFERENCES

Solid Waste Advisory Committee

Bennington Selectboard

Stuart Hurd, Bennington Towns Manager

Towns of Bennington Municipal Plan

Bennington County Regional Commission

ACT 78 - Statutes Annotated

Vermont Solid Waste Management Plan 1989

Vermont Solid Waste Management Plan 2001

Vermont Solid Waste Implementation Plans Guidance Document

Agency of Natural Resources Website

Center for Rural Studies Website

Federal Environmental Protection Agency Website

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