



# Connecticut Department of Energy and Environmental Protection





# Recycling Enforcement Initiative (REI)

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Connecticut Department of Energy and Environmental Protection

# America Recycles Day : November 15th

## Keep America Beautiful Initiative

### 2015 Statistics:

- Over \$118 million donated to a national public service advertising campaign.
- Over 260 million pounds of recycling/reuse material collected.
  - Avoided the equivalent of approximately 90,000 cars removed from the road for a year.



# Why Recycle?

Besides being the Law, Recycling:

- Beautifies communities;
- Creates jobs;
- Reduces our environmental footprint.
  - Reduces greenhouse gas emissions.
  - Reduces landfill capacity requirements.



# CT Recycling Law

CT recycling law has been in place for almost 30 years

- **First 20 years:** Saw relatively minor changes.
- **Last 10 years:** Significant changes.

<u>Public Act 10-87</u> (Expansion & Clarification of CT Recycling Requirements)	<u>Commercial Organics Recycling Law</u> Recycling of Source Separated Organics (CGS Sec. <u>22a-226e</u> )
<u>Public Act 11-24</u> (Paint Stewardship Law)	<u>Public Act 13-42</u> (Mattress Stewardship Law)
<u>Public Act 13-285</u> (An Act Concerning Recycling & Jobs)	<u>Public Act 14-94</u> (An Act Concerning CT's Recycling & Materials Management Strategy...)



# Public Act 14-94

Resulted in the establishment of the Comprehensive Materials Management Strategy (CMMS):

- Through the General Assembly's Environmental Committee;
- Through Public Comment;
- Adopted in July 2016;
- Replaces state-wide Solid Waste Management Plan;
- Includes a strategy to divert not less than 60% of solid waste generated in the state by 2014; and
- Acknowledges that to increase current diversion rate from 35% to 60%, a stronger program of state-led enforcement is absolutely necessary.



# Recycling: What you should be doing?

1. Establish a recycling or “green” team;
2. Identify all designated recyclable items (“DRs”);
3. Establish interior collection containers for DRs;
4. Establish exterior collection containers for DRs;
5. Maintain a contract for collection of DRs; and
6. Provide outreach/education to employees.



# What are Designated Recyclable Items (“DRs”)?

## DRs include:

- Paper Products (boxboard, cardboard, newspapers, magazines, office paper, colored paper...etc.);
- Metal and Glass Food & Beverage Containers;
- #1 and #2 Plastic Containers;
- Scrap Metal;
- Batteries (Lead Acid & NI-Cd);
- Used Motor Oil;
- Leaves; &
- Grass Clippings.



# Recycling Enforcement Initiative (REI)

- REI team created in 2016 with goal of providing a stronger program of state-led enforcement of CT recycling laws
- REI team:
  - Developed internal tools and procedures to evaluate compliance quickly and provide timely compliance assistance or enforcement response
  - Trained inter-agency staff to look for recycling noncompliance
  - Provided Field Compliance unit with revised “Business Recycling Checklist”



# What will field staff be looking for?

All of the items associated with an effective/compliant recycling program:

- Is there a recycling team in place?
- Are there appropriate interior containers for DRs?
- Are there appropriate exterior containers for DRs?
- Does the MSW contract provide for collection of DRs?
- Have employees been properly educated?

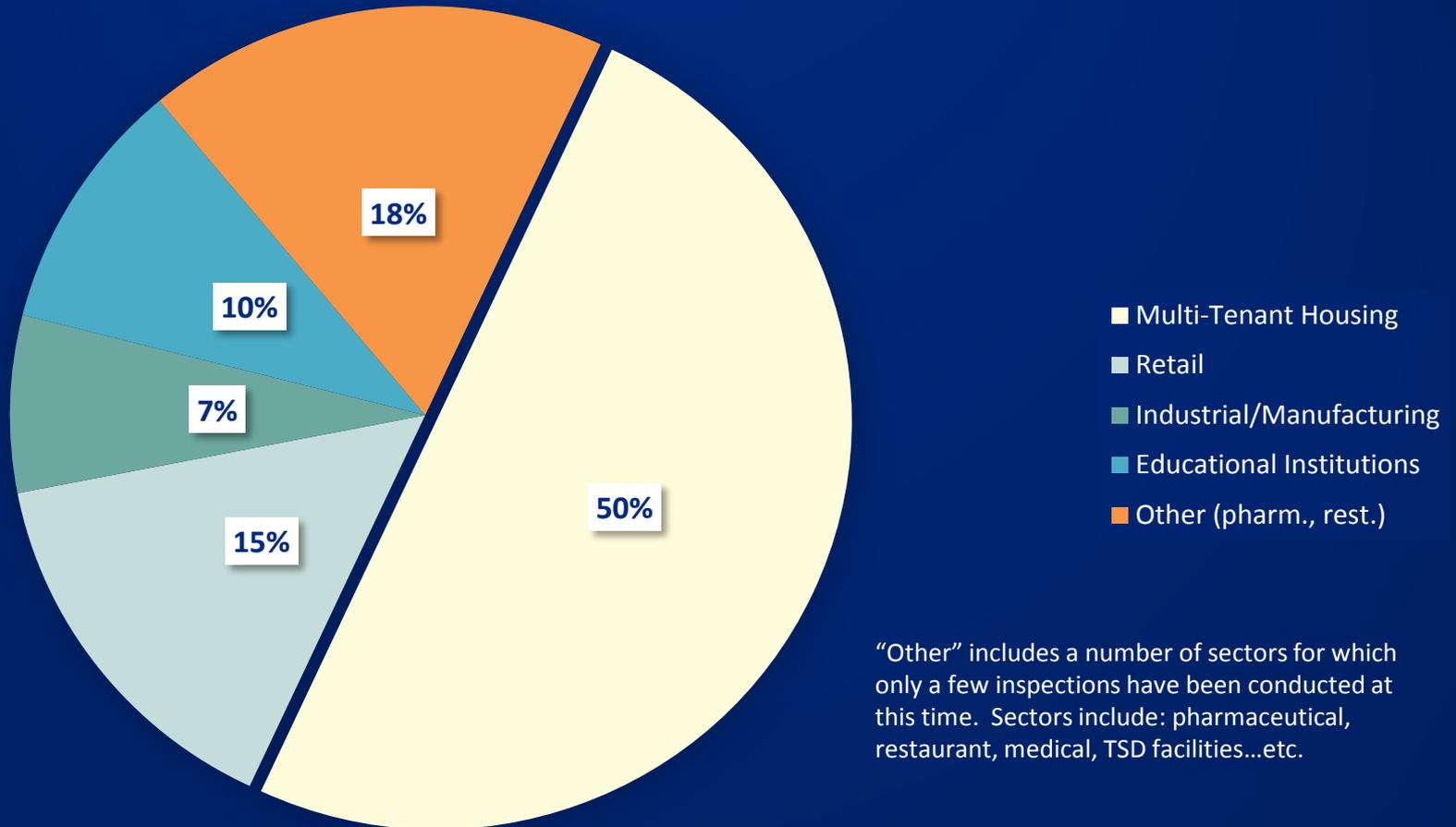


# DRs Mixed with Trash



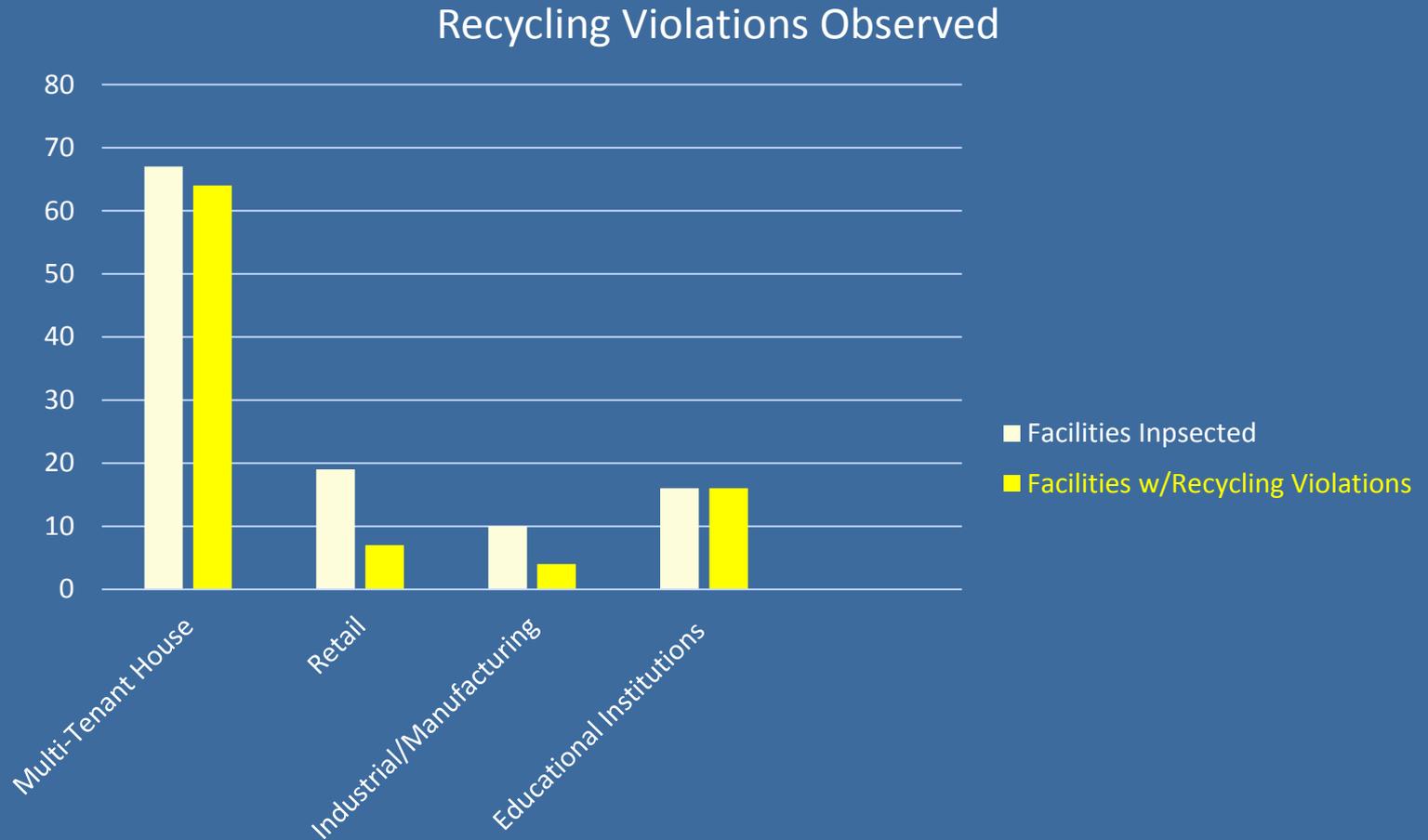
# DEEP Inspected approximately 140 facilities

## Sectors Evaluated



# REI: Field Results

75% of facilities inspected had recycling violations



# Typical Violations Encountered (cont.)

## 1. No Recycling Program at all:

- **Contracts associated with MSW collection not providing for collection of recyclable items.**
- No facility staff designated or responsible for recycling.
- No internal collection containers associated with recycling.
- No external collection containers associated with recycling.



# Typical Violations Encountered

## 2. Limited recycling:

Facility recycled only one or a few recyclable items.

- For example, some Retail or Manufacturing facilities recycled cardboard or scrap metal only.
- No recycling provided for other items, such as, bottles, cans, newspapers, magazines or office paper.

## 3. Mixing of recyclable items:

Facility may have had a recycling program in place, but more than an incidental amount of recyclable material was combined with trash.



# REI Actions to Date

## NOVs issued to over 40 facilities (Mostly Multi-Tenant Housing Facilities)

- Early in the process, but several have responded well by implementing Recycling Programs.
  - Installed collection containers for DRs (internally & externally)
  - Expanded collection contracts with Solid Waste Haulers to include collection of DRs
  - Provided outreach/education to tenants
  - Developed and implemented SOPs to ensure DRs remain segregated
- Those that fail to adequately respond will be assessed to determine the need for an escalated action, consistent with the Enforcement Response Policy (ERP), which may include civil penalty.



# REI Actions to Date (cont.)

## Several NONs issued: No formal response required

- Identifies specific violations observed.
- Provides notice to facilities of recycling requirements.

## Utilized Compliance Assistance for balance of facilities with recycling compliance issues

- Generally, for facilities with minor recycling violations.
- Communication is assistance-based and not enforcement based.



# Good News

## Manufacturing/Industrial Sector

- The four (4) facilities identified as noncompliant, verified compliance in a timely fashion.

## Multi-tenant Housing Sector

- Dozens of multi-tenant housing facilities have addressed recycling violations.
  - Over 1,300 units now maintain appropriate recycling provisions.



# More Information Available At:

- [DEEP – Main Website](#)
- [Recycling Homepage](#)
- [Business Recycling Assistance webpage](#)
- [CMMS webpage](#)



# Questions???



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