



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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November 22, 2006

George Drew
Environmental Compliance Specialist
Covanta Haverhill, Inc.
100 Recovery Way
Haverhill, MA 01835

Covanta Haverhill
Material Separation Plan 4
MSP4 Approval

Dear Mr. Drew:

The Massachusetts Department of Environmental Protection ("MassDEP") is approving the Material Separation Plan for the Diversion of Mercury ("MSP4") from Covanta Haverhill dated August 24, 2006 and covering the two-year period of January 1, 2007 through December 31, 2008, with one condition concerning the IWSA outreach plan.

The following points were raised during the public comment period:

- Non-contract communities are interested in taking advantage of the tiered level of service provided for in MSP4. MassDEP will work with you to broadly promote this opportunity within the guidelines defined in your Plan.
- Municipalities expressed concerns about the IWSA Outreach Plan. They are concerned that the campaign is stale, while still consuming a significant share of the MSP budget.

As a result of the comment concerning IWSA, we request that you forward a copy of the updated IWSA outreach plan. We will also set up a meeting with you, IWSA and the other facilities in early 2007 to discuss the new plan and its benefits to the municipalities served by the plan.

In addition, MassDEP will continue to actively promote MSP4 services by conducting direct outreach to schools, businesses and health care facilities in your contract communities encouraging them to avail themselves of the services offered.

The approved MSP4 has been posted on our web site at:

<http://www.mass.gov/dep/recycle/solid/covanta.htm>

Please contact Tina Klein, at 617-292-5704 should you have any questions.

Sincerely,

SIGNATURE ON ORIGINAL

Nancy L. Seidman, Division Director
Consumer and Transportation Programs
Bureau of Waste Prevention

cc: James Lynch, Facility Manager
Ted Hoefler, Regional Vice President
Daniel Harty, MSP Coordinator
James C. Colman, MassDEP
Heidi O'Brien, MassDEP NERO

Covanta Haverhill, Inc.
Material Separation Plan IV for Mercury Containing Products
January 1, 2007 – December 31, 2008

Submitted June 30, 2006

Revised August 24, 2006

Purpose: Compliance with 310 CMR 7.08(2) Regulations Governing Municipal Waste Combustors

Submitted to: Massachusetts Department of Environmental Protection
One Winter Street, 9th Floor, Boston, Massachusetts 02108

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I. Background and Purpose

In 1998, the Massachusetts Department of Environmental Protection (MADEP) promulgated regulations 310 CMR 7.08 (2) governing municipal waste combustors (MWCs). Section 310 CMR 7.08(2)(f)(7) required MWCs to submit a material separation plan that describes actions the MWC will take for the removal of mercury-containing products from the waste stream. The plan must be developed in accordance with the MADEP's "Material Separation Plan Guidance Document" revised June 29, 2001.

Covanta Haverhill (formerly Ogden Martin Systems of Haverhill, Inc) developed their first Material Separation Plan for the removal of mercury and mercury containing products and submitted the proposed Plan on October 31, 2000. MADEP reviewed the Plan and issued final approval on February 2, 2001. The first MSP program was conducted from February 2001 until July 2002. Subsequently, the MSP II program ran from July 2002 to June 2004. MSP III began July 2004 and will continue until December 31, 2006.

In 2004, the MSP timelines were revised by MA DEP to provide sufficient opportunity for review of annual reports, development of future MSP plans, review by MADEP, and the finalization of the plan. In accordance with those new timelines, MSP IV covers the 2 year planning and implementation period from January 1, 2007 through December 31, 2008.

The following proposed fourth Material Separation Plan (MSP IV), similar to previous MSPs, has been based on MADEP's "Material Separation Plan Guidance for Municipal Waste Combustors" revised June 29, 2001.

II. Overview of the MSP IV

A. Goals

The overall goals of the MSP IV continue to be:

- Comply with applicable Massachusetts regulations
- Implement a program that builds on existing programs, to the extent practicable
- Coordinate with other MSP programs being implemented to minimize redundancy and make the best use of the resources being spent on this mercury diversion effort
- Expand public awareness about mercury
- Divert mercury products from the solid waste stream
- Reduce the use of mercury-containing products
- Increase participation in mercury recycling/reduction programs

Please note that the MSP is only a planning document. Statements regarding projected diversions of mercury containing waste, budget categories, etc. are provided in response to MADEP requests for estimates of anticipated program results. They are not intended to serve as enforceable commitments.

As recognized in the MADEP Guidance document, Covanta and other waste combustors do not have extensive experience in changing people's behaviors and encouraging participation in material separation plans. It is still very early in a long-term process designed to change behavior, buying and disposal habits. In a large part, because of the difficulty in measuring behavioral change, it remains unclear how the public-at-large, businesses and municipal/institutional waste generators are responding to the different programs.

Over time, as the industry continues to gain experience through implementation of the various programs, availability of quantitative data to help measure effectiveness of outreach and collection programs should become more meaningful.

B. MSP IV Development Process

The following discussion summarizes the MSP IV development process and reviews stakeholder input from communities in the Covanta service area including recycling coordinators, use of outside consulting help, and research/modeling that was done.

As noted above, Covanta and other municipal waste combustors do not have extensive experience in changing people's behaviors to encourage participation in the MSP.

Therefore, Covanta and a group of MWC vendors (collectively, “the MSP group”) continue to utilize its trade organization, the Integrated Waste Services Association (IWSA) to assist in the development of the public education and information campaign.

The IWSA is a national waste management trade association that includes Covanta and Wheelabrator, among others. The public education effort as described is conditioned on all members of the MSP group providing adequate funding. The cost figures provided herein represent only Covanta Haverhill’s share of the public education effort based on a sharing formula agreed to by the MSP group.

MADEP should be aware that if funding falls below the level anticipated because another MSP group member does not agree to fund at a certain level, then all the public education efforts might not be completed as planned.

1. Coordination with MADEP

Starting with receipt of the MADEP Guidance in January 2000 and continuing for over six years, Covanta has participated in a series of informational and policy meetings with MADEP staff and management.

The MSP group, IWSA and MADEP have also met a number of times, both at MADEP’s Boston offices and via conference calls. The MSP group has also met over the past two years independent of MADEP to evaluate how to coordinate programs and minimize redundancy, to facilitate access to mercury diversion programs and maximize commercial, institutional and public participation in programs. The MSP group will continue to meet and discuss how to best maximize participations in the programs.

MADEP has continued to provide Covanta and the MSP group with various informational documents related to mercury recycling, universal waste and mercury separation programs including lists of MADEP universal waste shed grants, contacts for local/regional environmental organizations and waste grants.

2. Coordination with Recycling Coordinators and Community Stakeholders

Covanta has maintained dialogue with the recycling coordinators of the Covanta contract communities, the MRIP coordinators (now Municipal Assistance Coordinator’s, MAC’s) and the MSP group during development and implementation of the subsequent MSP’s (MSP II, MSP III & MSP IV). This continuing communication fosters information sharing between the municipalities and helps to ensure that the MSP IV implementation will continue to proceed in a coordinated, non-duplicative way.

3. Environmental/Citizen/Health Community Outreach

To aid in the development of the MSP IV, Covanta sponsored eight (8) public meetings to solicit input and comments from municipal officials, environmental groups and local citizens of the Covanta contract municipalities.

Meetings were held in the afternoon and again in the evening at centrally located facilities which included: Devens, MA (Spring Hill Suites), Wakefield, MA (Sheraton Colonial), Haverhill, MA (Comfort Suites), and Danvers, MA (Sheraton Ferncroft).

Covanta believed that utilizing different locations and times would give more people the opportunity to attend and participate in development of the MSP IV. While attendance was relatively low, the comments and discussions were useful in preparing the MSP IV.

Some suggestions received from the meetings - such as having the municipalities enact mandatory mercury recycling/diversion ordinances - have recognizable merit. In some cases, they have been successfully implemented (thermometer bans as well as a mandatory fluorescent light recycling/management ordinance in Haverhill). Covanta will continue to explore ways to aid the municipalities in these efforts.

Other suggestions made at the meetings that Covanta will look to incorporate during the implementation of MSP IV include:

- Monitor electric utilities operated by Covanta contract municipalities such as Wakefield, Littleton, and Groton, to ensure the recycling of their mercury containing products.
- Conduct outreach/educational efforts focusing on Fish and Game, Rod and Gun clubs, Rotary, Kiwanis, Lions, Exchange Clubs, facility maintenance associations/groups and tanning salons, League of Women Voters, garden clubs, etc.
- Provide outreach/educational efforts to the waste haulers
- Secure banners, sign-boards and other portable advertising materials to publicize mercury product recycling at municipal festivals, fairs, etc. and offer to communities for recycling events/HHW days.
- Monitor and assist health care facilities, in particular, the members of the “Hospitals for a Healthy Environment” to insure the recycle of their mercury containing products.
- Establish a Mercury Awareness program to be presented at school assemblies. Use of experienced outside consultants to speak to various age groups with talks tailored to individual communities, i.e. curbside vs transfer station recycling, local mercury program efforts, etc.

C. Target Sectors

Based on the results of Covanta’s experience with previous MSPs, it appears that hospitals, schools, and municipalities were the most responsive to mercury diversion programs and they will continue to be a major focus during the MSP IV.

Schools within the Covanta contract communities will continue to see outreach/education efforts focusing on proper management of mercury containing products.

The general public will continue to be invited to participate in diversion programs such as mercury collection events, thermometer exchanges, HHW collections and other events, as appropriate.

Residents and small businesses will be targeted for the Mercury Product Collection Events Program.

Trades people (plumbers, electricians, etc.), utility companies, wholesalers and retailers will be targeted for the mercury thermostat recycling program

Continue to work with municipal water and sewer departments to determine whether they still have mercury flow meters in use or in storage so that they can take advantage of our program.

Municipal government agencies (Health Dept, DPW, etc) will be targeted for municipal recycling efforts such as the mercury collection events, thermometer exchanges and support for HHW events.

Covanta municipal electric utilities will be targeted to help recycle their mercury containing products and to enlist their aid in promoting mercury product recycling to their customers.

Schools in the Covanta contract municipalities will be targeted to implement the school mercury clean-out program that is designed to remove, replace with non mercury items, and recycle mercury and mercury containing devices.

Health care facilities in the Covanta contract municipalities will be targeted to implement mercury clean-out program that is designed to remove, replace with non mercury items, and recycle mercury and mercury containing devices.

In each of these programs, specific activities, designed to achieve the MSP IV's overall objectives, are identified and supplemented with timelines and budget estimates. Some of these activities will continue to overlap with each other although the targeted audiences for each are different. As these activities continue to be implemented, we will assess the effectiveness of each with the intention of modifying, in conjunction with the MA DEP, various elements of the outreach initiative, as needed, to make them more effective.

D. Target Areas

In MSP IV, Covanta will continue to implement its program activities in all of its contract communities including Haverhill, Lawrence, Salem (NH), Stoneham, Reading, Wakefield, Melrose, Danvers, Lynnfield, Middleton, Essex, Littleton, Harvard, Ayer, and Groton.

Based upon the experience gained in MSP III, different outreach techniques will be utilized for different towns, based upon their willingness to participate in an activity. Details of these efforts are detailed in following sections.

Covanta Haverhill would be willing to examine proposals from non-contract communities provided certain commitments were made by that community:

- The community would need to commit its waste to Covanta Haverhill for the duration of MSP IV plan (two year).
- Community would need to provide certain documentation to prove that their waste has been disposed of at Covanta Haverhill, both for the past year and for the next two years.
- Community would need to show a willingness to participate in the any of the Covanta program activities.

III. Proposed MSP IV Activities 01/01/07 — 12/31/08

A. IWSA Outreach\Education

1. Activity Description:

The MSP group will continue using the services of the Integrated Waste Services Association (IWSA), its industry group, to achieve economies of scale by collectively developing appropriate educational materials and conducting an effective outreach program to the affected public (businesses, municipalities, households, etc.). See Attachment 1 for details of this component.

2. Activity Evaluation:

This activity will be measured and evaluated by documenting the outreach activities that are completed during the year. A summary of this information will then be provided in the MSP annual report.

3. Activity Budget:

For this IWSA component, Covanta has budgeted \$47,500\year for a total of \$95,000 for the 2 year period. See details of these costs in Attachment 1.

B. Facility-Level Outreach\Education

1. Activity Description:

All plan activities will be conducted under the guidance of the Covanta MSP program manager. In addition, Covanta is budgeting for consultant support to help conduct the many outreach/education activities detailed in the MSP IV. (i.e. Cuoco & Cormier providing school outreach program) Some of the facility level outreach activities will include:

- Continue follow up on compliance with the city of Haverhill's fluorescent bulb regulation. Continue to contact city businesses and verify that each business has established a written policy of Hg product recycling options. Policy should include an invitation for employees to bring bulbs/mercury products from home to be included with businesses mercury items.

Hg recycling options may include: Participation in Covanta's Mercury Collection Event, shipment of mercury products with hazardous waste shipments, use of pre-paid mailers such as Onyx-Pac, taking bulbs/mercury products to town transfer station shed (if acceptable by the town), use of a local retail outlet that collects for a fee, etc.

- Work with additional contract municipalities to develop, approve and implement a fluorescent bulb regulation similar to city of Haverhill. The goal for 2007 would be to work with two additional municipalities. Preference would be for those towns most willing to get involved. Depending on the 2007 results, this activity may be expanded in 2008.
- Continue to research and examine existing municipal hazardous waste/mercury collection programs. Determine how Covanta can support such programs to encourage additional Hg product recycling.
- Continue initiatives to incorporate businesses into the MSP IV activities. Work will include door to door outreach and phone call campaigns in each target town to establish contacts, explore current practices and work to determine easiest way to participate in Hg recycling. Additional description of these efforts is included in following sections under each activity's outreach methods.
- Coordinate with IWSA's contractor (website) and/or a local advertiser to publicize program activities.
- Work with municipal officials to incorporate Covanta mercury recycling activities information into municipalities' advertisements for their existing municipal household hazardous waste collection programs, municipal recycling brochures and mailings that are sent to residents from the municipal recycling, water or electric departments.

- Continue attempts to communicate with the business community by working with the local Chambers of Commerce (that may have e-mail list), Rotaries, League of Women Voters, garden clubs and other business associations. Attempt to hold ten (10) informational meetings per year in an ongoing effort to maximize communication about the program to the business community.
- Continue to send press releases, detailing event successes, to newspapers and other media as program feedback to the residents and the business community.
- Attempt to hold ten (10) presentations to Fish and Game Associations, Rod and Gun Clubs, etc. These presentations will focus on improper management of mercury containing products, problems associated with mercury in the environment and how Covanta's program can help solve the problem.
- Continue contact and communication efforts with community/public sector leaders and environmental/activist groups, which have an interest in, or are already engaged in, mercury diversion programs. This will help to guarantee coordination, lack of duplication, and help to build local support for the Covanta program.
- Continue contact with mayors, state representatives, congressmen, educators, and other opinion leaders to inform them about Covanta's program and gain their support for it.
- Continue with outreach efforts in the healthcare fields, including clinics.
- Advertise results of mercury reduction efforts in each community
- Increase use of public service announcements in newspapers, community TV, etc
- Work with consultants, such as Cuomo & Currier, to make mercury presentations at school assemblies.
- Work with MAC's, recycling coordinators, etc

2. Activity Evaluation:

This activity will be measured and evaluated by documenting the outreach activities that are completed during the year. Where possible, numbers of attendees, participants, etc will be documented. A summary of this information will then be provided in the MSP annual report.

3. Activity Budget:

For the 2 year period, Covanta has budgeted \$268,000 for the Covanta MSP program manager, \$20,000 for special outreach/collection advertisements, and \$9,000 for consultant education\ outreach program.

Covanta MSP program manager costs include salary, benefits, expenses, support personnel, and Covanta management oversight including future development costs for MSP V. On a routine basis, the MSP manager meets with Covanta management to review results, discuss problems and make changes. In addition, Covanta management is extensively involved with MSP development including plan review\revision, meetings with industry reps and meetings with MA DEP.

C. Mercury Product Collection Program

1. Activity Description

This activity will target the diversion of mercury containing products from residents and small businesses.

Early in MSP III, Covanta observed that single day collection events had limited participation yet high costs (Advertising, recycling contractor fees, etc.) Covanta tried to minimize costs and encourage participation by regionalizing events between groups of towns.

For example, for the cities of Lawrence, Haverhill and Salem, NH, an event would be organized for Haverhill and then, through advertising, the Salem and Lawrence businesses and residents would be invited to participate. The next event held that year would rotate to the next town and invitations would be extended to the other two towns. While reducing costs, this approach also saw limited participation.

Also in MSP III, Covanta's MSP coordinator was able to coordinate with certain towns to allow year round Hg product collections at their municipal facilities. In some of these towns, both residents and the towns businesses are now able to drop off Hg products whenever the transfer station is open. Covanta would support the town by advertising this option and by picking up the costs of the products collected.

This activity will continue to build on existing municipal drop-off collection systems in the Covanta communities. Covanta's goal is to establish a suitable mercury product drop-off option for each of the Covanta contract communities that wish to participate. Options considered include:

- a) Conducting mercury product drop off day events at community sheds. This option has been revised from the past to eliminate the cost of the Hg contractor's on site time.

In the past, Covanta personnel, the Hg recycling contractor driver and local personnel would conduct these 2-4 hour events. In addition to the cost for recycling Hg products, the contractor would charge \$500 per event for onsite time. This expense constituted a major portion of this activity's cost.

For MSP IV, under this option, Covanta personnel and a local representative would instead hold the event at the community's universal waste shed. The contractor will not be scheduled for the event itself, but rather, Covanta will make arrangements to have the recycling contractor collect the material as part of their normal route thus minimizing the event's cost.

Advertising\Outreach costs as well as recycling costs will remain the same.

Covanta believes this option is appropriate for approximately 9 of the contract municipalities.

b) Promotion of year round drop off locations. For some of our contract communities, residents and businesses can drop off mercury products to the shed/transfer station year round provided that certain conditions are met.

Under this option, Covanta will not hold additional day events, but will help the community promote this option through advertising and outreach.

Covanta will continue to support the costs of recycling the Hg products collected at these locations.

Covanta believes this option is appropriate for approximately 5 of the contract municipalities.

c) For one contract community, options a or b are currently not feasible. The community does not have a waste shed or a transfer station to use as a staging location. Thus, 2 collections events will be scheduled per year. Covanta and a Hg recycling contractor's truck will be used to ensure proper handling, transportation and storage of the collected materials.

2. Activity Outreach

The IWSA campaign, as discussed above, will be an important component of the outreach campaign. The IWSA campaign consists of public service announcements, radio spot advertisements and Web-based tools.

Complemented by this broad IWSA campaign, additional outreach and educational efforts will be conducted by the Covanta MSP program manager and consultant support. The following initiatives will continue to be conducted specifically for this activity:

- With the assistance of the municipalities, designate locations, dates, and staff for these events.
- Determine the availability of municipal personnel and/or environmental group volunteers to assist with these events, if necessary.
- The MSP program manager will be responsible to place advertisements in local papers for Collection Events. Additional ads will be placed for certain towns to advertise their other options for Hg recycling such as the local transfer station.
- Coordinate with IWSA's contractor (website) to publicize this program to residents and small businesses on the MSP website.
- Coordinate with local media to advertise and/or publicize this program to residents and small businesses.
- Develop initiatives to incorporate small businesses into the programs such as notices on DEP letterhead asking cooperation.

- Continue to coordinate with municipal officials in efforts to develop official event notices to residents and small businesses.
- Work with municipal officials and offer to incorporate the mercury products recycling program into the city/town recycling brochures and/or to include mercury recycling information with mailings to residents from recycling, water or electric department.
- Continue to utilize the municipalities' existing system for advertising household hazardous waste collection programs.
- Develop event advertising sign boards and large street banners consistent with the IWSA campaign. Work with local officials to determine proper location to place banners/boards for advertising an event or the year round drop off option.

3. Activity Evaluation

This activity will be measured and evaluated by determining when possible, the number of contacts made, the level of business participation and the amount of wastes diverted, such as the number of devices/bulbs collected, and the equivalent quantity of mercury diverted from the waste stream. A summary of this information will then be provided in the MSP annual report.

4. Activity Budget

For the 2 year MSP IV period, Covanta is budgeting \$66,000 for this activity. Costs include advertising costs\event outreach, recycling contractor's labor\transportation costs, mercury recycling cost, and other event costs (spill kits, training etc.)

D. Thermometer Exchange Program

1. Activity Description

In past MSPs, Covanta has worked with its communities to conduct thermometer exchange events in connection with the town's annual flu clinics. At these events, residents could drop off Hg thermometers and receive a non-Hg replacement. In addition, these programs have been expanded to allow residents to also drop off thermostats.

Thermometer swaps/exchanges/thermostat collections are an extremely effective tool in helping to educate the general public on mercury issues while helping to remove a potential mercury waste material and health hazard from the home.

For MSP IV, Covanta will continue to support this activity in all Covanta contract municipalities that wish to continue to participate.

As in the past, Covanta will conduct the swaps/exchanges/collections in conjunction with the Boards of Health, Recycling Committees or other municipally designated entity. Ideally, dates and/or locations will be chosen that take advantage of other activities occurring in the municipalities that will enhance program exposure and improve participation.

Advertisements will be placed to encourage residents to utilize this option. The collection of spent mercury thermostats will be included in all advertisements/notices.

Covanta has purchased digital thermometers and will continue to make them available for distribution in the swaps/exchanges. Thermostats turned in will not be replaced.

Covanta will work closely with local boards of health that issue permits/make inspections to insure mercury product recycling is included.

2. Activity Outreach

Covanta's MSP program manager will maintain contact with the Boards of Health, Recycling Committee or other municipally designated entity, as appropriate, to facilitate thermometer exchanges/thermostat collections in the Covanta contract municipalities. The MSP program manager will coordinate delivery of the digital thermometers, pails and spill kits for use during the collection and arrange for pick-up and recycling of the collected material. Covanta will offer spill kits to each board of health. Covanta will publicize the events utilizing posters, notices, road side sign boards\banners and advertisements in local newspapers.

3. Activity Evaluation

This activity will be measured and evaluated by determining the amount of thermometers\thermostats collected and exchanged and the equivalent amount of mercury diverted from the waste stream. A summary of this information will then be provided in the MSP annual report.

4. Activity Budget

Additional money required from MSP IV to fund the municipal thermometer swaps/exchanges should be limited to publicizing the events and disposal. The thermometers have been purchased. Advertising cost, mercury recycling costs, and travel for 15 communities over a 2 year program is estimated to be \$8,000.

E. Municipal Mercury Recycling Reimbursement

1. Description of Activity

In order to assist communities with the costs associated with mercury product recycling, Covanta will continue to reimburse any Covanta contract community for the costs incurred in collection, storage and recycling of residentially and/or municipally generated mercury containing products (fluorescent lights, thermostats, thermometers etc.), collected at one-day Mercury Collection Events or at permanent facilities (either permanent HHP centers or Universal Waste Sheds) or as previously mentioned.

The goals of this activity are:

- Increase the public awareness of mercury, health and environmental issues surrounding mercury content products, and the potential impacts of improper disposal.
- Increase collection of mercury containing products.
- Creation of a sustainable, highly beneficial, low cost program.
- Increased participation of communities with limited resources by supporting the residential collection program through subsidized mercury product collections and/or by supplying them with a Universal Waste Shed and reimbursing the cost of recycling the residentially and municipally generated materials.
- Periodically inventory transfer station sheds for spill kits, replace if missing.
- Offer each community's Boards of Health mercury spill training by an experienced consultant.

2. Activity Outreach

Outreach for this activity consists of Covanta's MSP program manager continuing to meet with local municipal officials (DPW, Boards of Health, public utilities, recycling coordinators, etc.) to explain the benefits of our program and soliciting their participation in the numerous activities that we support: Universal Waste Shed Grants, thermometer exchanges, mercury product collections, in addition to the reimbursement offered to municipalities for collecting and recycling mercury containing products generated by municipal buildings, residents or, if allowed by the municipality, small businesses.

3. Activity Measurement

This activity will be measured and evaluated by documenting equipment\support provided to each municipality and determining the amount of waste collected and the equivalent amount of mercury diverted from the waste stream. A summary of this information will then be provided in the MSP annual report.

4. Activity Budget

For the 2 year MSP IV period, Covanta is budgeting \$28,000 for this activity. Costs will cover mercury recycling costs

F. Thermostat Collection Program

1. Activity Description

A significant portion of mercury contained in the municipal waste stream is entering through the improper management/disposal of mercury containing thermostats. While programs are available for the recycling and reclamation of these products, participation by the wholesalers, HVAC trades people and consumers are limited, at best.

Covanta will continue to distribute thermostat collection containers to wholesale distributors of thermostats in the Covanta contract municipalities who wish to participate in the Covanta recycling program but have not yet signed-up to join. Covanta has an inventory sufficient to supply all the wholesale distributors of thermostats within the Covanta contract municipalities that wish to participate.

Additionally, Covanta will continue to offer an added incentive to encourage the HVAC and other trades people to return end-of-life thermostats for recycling. Covanta has designed and is implementing a program that is offering a \$5.00 cash “incentive” to trades people (plumbers, electricians, HVAC technicians, fuel oil dealers, etc.) in the Covanta contract municipalities for each mercury thermostat returned for recycling.

Covanta is also offering to set-up thermostat recycling at retail locations in the Covanta contract municipalities that would like to participate. GSG and FW Webb of Haverhill have already joined join this program.

Covanta will work with building inspectors to insure information on recycling of mercury products is part of the permitting process.

While there is no financial incentive for the retail businesses that agree to participate, Covanta will supply all materials that are necessary (mercury spill kits, buckets, flyers, stickers, posters, newspaper advertisements, etc) to participants at no charge and will cover all costs associated with the collection and recycling of the mercury thermostats. Additionally, display ads will be placed in local newspapers to publicly recognize the wholesale and retail participants in the program for their leadership and commitment to their community

2. Activity Outreach

Covanta will hold informational meetings for the HVAC industry, utilizing, where possible, their trade associations, designed to gain their support and participation in the thermostat recycling program. Covanta will also utilize outside consultants to aid in contacting and recruiting participants for this program. Covanta will also ask local building inspectors to require recycling of mercury products as part of their permit process. As part of the MSP IV, Covanta will contact the utility companies operating in our service area to coordinate efforts at digital thermostat promotion and mercury thermostat replacement.

3. Activity Evaluation

This activity will be measured and evaluated by documenting the equipment provided, rebate incentives/grants awarded and determining the amount of waste collected and the equivalent amount of mercury diverted from the waste stream. A summary of this information will then be provided in the MSP annual report.

4. Activity Budget

For the 2 year MSP IV period, Covanta is budgeting \$10,000 for this activity. Costs will cover advertising, mercury recycling costs, and costs of the recycling rebate incentive s\grants.

G. School Mercury Clean Out Program

1. Activity Description

As described in MSP III, Covanta has been conducting mercury and mercury product cleanouts at schools located with the contract communities. These activities will continue for additional schools during the next 2 year MSP IV.

The goals of this activity are to remove a potential hazard from schools and increase the participating school administration awareness of mercury, health and environmental issues regarding mercury content products, and the potential impacts of improper disposal of mercury containing products

The clean-out program will continue to include the following: initial contact, school staff meeting, securing participation agreement from administration, mercury inventory, mercury training for staff (if requested), ordering of replacement products, arranging for safe pick up of mercury materials, and follow up, including assessment of effectiveness in terms of total amount of mercury and mercury products collected.

Under MSP IV, this service will be offered to remaining public and private schools in contracted towns i.e. Austin Preparatory School Reading, MA.

2. Activity Outreach

Outreach for this activity will consist of making initial contact, having school staff meeting, securing participation agreement from administration, conducting mercury inventory, and providing mercury training for staff.

3. Activity Evaluation

This activity will be measured and evaluated by documenting the outreach activities conducted and determining the amount of waste collected and the equivalent amount of mercury diverted from the waste stream. A summary of this information will then be provided in the MSP annual report.

4. Activity Budget

Based on costs in 2005/06, Covanta finds that the average cost associated with mercury school cleanout programs, including labor, removal and recycling of mercury products and purchase of replacement products is approximately \$3000 per school for each cleanout. Covanta anticipates conducting 10 school cleanouts over the 2 year term of the MSP IV for a total budget of \$30,000.

H. Health Care Facility Mercury Clean Out Program

1. Activity Description

In MSP IV, Covanta will begin research on implementing a cleanout program for numerous types of health care facilities including hospitals, clinics, medical professional offices, nursing homes, etc. This program will be modeled after the school cleanout program detailed above.

The goals of this activity are to remove a potential hazard from these clinics and increase the participating clinic's staff's awareness of mercury, health and environmental issues regarding mercury content products, and the potential impacts of improper disposal of mercury containing products

The clean-out program will continue to include the following: initial contact, staff meeting, securing participation agreement from facility management, mercury inventory, mercury training for staff (if requested), ordering of replacement products, arranging for safe pick up of mercury materials, and follow up, including assessment of effectiveness in terms of total amount of mercury and mercury products collected.

Under MSP IV, this activity will attempt to target five (5) facilities in year one. Based on results of year one, five or more facilities may be targeted in year two of MSP IV. Only facilities located in Covanta contract communities will be targeted for MSP IV.

2. Activity Outreach

Outreach for this activity will consist of making initial contact, having staff meeting, securing participation agreement from management, conducting mercury inventory, and providing mercury training for staff.

3. Activity Evaluation

This activity will be measured and evaluated by documenting the outreach activities conducted and determining the amount of waste collected and the equivalent amount of mercury diverted from the waste stream. A summary of this information will then be provided in the MSP annual report.

4. Activity Budget

Based on costs determined in 2005/06 for the school cleanout program, Covanta finds that the average cost associated with mercury cleanout programs, including labor, removal and recycling of mercury products and purchase of replacement products is approximately \$3,000 per facility for each cleanout. Covanta will budget similarly for this activity. The budget for ten facility cleanouts over the 2 year term of the MSP IV will be \$30,000.

IV. Proposed MSP IV Budget 01/01/07-12/31/08

The MSP IV covers the 2 year period of January 1, 2007 - December 31, 2008.

In 2005, approximately 562,358 tons of waste was processed at the Covanta Haverhill facility.

The cost of implementing the proposed mercury diversion program will not exceed the \$0.50 per ton value as per the MA DEP's Guidance. Therefore, the budget is proposed at \$282,000\year for a total of \$564,000 for MSP IV.

As the program continues to be implemented, Covanta will assess its effectiveness with the intention of modifying the MSP IV, as necessary, in conjunction with the MADEP.

While actual expenditures may change somewhat between the categories to make necessary mid-course adjustments that enhance overall program effectiveness, it is anticipated that the relative budget priorities should remain proportionately similar to that presented above.

See budget breakdown below.

V. MSP IV Activity Timeline 01/01/07 - -12/31/2008

In general, the time line for the 01/01/07-12/31/08 MSP IV is as follows:

1ST Quarter of 2007 Continue planning and conducting thermometer swaps/exchanges; continue work on the Universal Waste Shed procurement program; continue work on the thermostat “rebate” collection program; continue with contractor of school mercury clean out program; continue outreach and implementation of mercury collection-day program in remaining contract communities.

2nd Quarter of 2007 Continue implementation of the mercury collection/recycling programs in the contract communities; continue to plan and hold thermometer swaps/exchanges in Covanta communities; continue to work with communities interested in procuring Universal Waste Sheds; continue work on the thermostat “rebate” collection program; continue to hold informational meetings in various communities to explain the Covanta program and the goals for the coming year; continue with the implementation of the school mercury clean out program.

3rd Quarter of 2007 Continue working with communities to set-up mercury product collection events; finalize schedule of 2007 collection events; continue work on the thermostat “rebate” collection program; continue with the implementation of the school mercury clean out program; continue outreach efforts to the healthcare; continue to hold informational meetings in various communities to explain the Covanta program and the goals for the coming year.

4th Quarter of 2007 Continue ongoing program operations and continue to approach and implement collection programs in remaining Covanta contract communities; schedule collection events in additional communities; schedule thermometer exchanges; hold informational meetings for the healthcare; continue with the implementation of the school mercury clean out program; continue outreach work with wholesalers, retailers and trades-people for the thermostat “rebate” collection program; follow-up with municipalities that have not taken advantage of Universal Waste Shed purchase/reimbursement; review data.

1st Quarter of 2008 Continue ongoing program operations and continue to approach and implement collection programs in remaining Covanta contract communities; schedule and hold thermometer exchanges; continue to do outreach in the healthcare; continue with the implementation of the school mercury clean out program; continue outreach work with wholesalers, retailers and trades-people for the thermostat “rebate” collection program; continue to follow-up with any remaining municipalities that have not taken advantage of the Covanta Universal Waste Shed purchase/reimbursement program.

2nd Quarter of 2008 Finalize collection contracts in remaining Covanta contract municipalities that wish to participate; schedule collections for fall 2008; continue outreach work with wholesalers, retailers and trades-people for the thermostat “rebate” collection program; continue with the implementation of the school mercury clean out program; continue to hold informational meetings in various communities to explain the

Covanta program and the goals for the coming year; review data.

3rd Quarter of 2008 Continue to work with the healthcare communities; continue with the implementation of the school mercury clean out program; continue outreach work with wholesalers, retailers and trades-people for the thermostat “rebate” collection program; continue to work with the municipalities on mercury product collections; hold informational meetings in various communities to explain the Covanta program and the goals for the coming year.

4th Quarter of 2008 Continue to work with the healthcare communities; continue outreach work with wholesalers, retailers and trades-people for the thermostat “rebate” collection program; continue with the implementation of the school mercury clean out program; continue to work with the municipalities on mercury product collections; hold informational meetings in various communities to explain the Covanta program and the goals for the coming year; meet with MADEP, hold stakeholder meetings and begin process of reviewing data, writing and submitting the next Draft MSP (MSP V).

VI. Measurement and Evaluation

A means of accounting for the materials collected from each diversion program and monies expended for each program will be built into each program implemented. This can include record keeping at each event, tracking of the total amount of material diverted to mercury recycling, number of vehicles, and estimates of the amount of mercury collected, etc.

Onyx (Violia) furnishes actual counts of materials (numbers of thermostats, thermometers, switches, etc) diverted through the Covanta collections programs. This enables Covanta in their annual reports to use a more standardized and consistent conversion method when calculating the mercury content in the materials diverted.

The collection of this data and feedback will allow for program adjustments, fine-tuning and assessment of program effectiveness and will be utilized when preparing the annual reports.

As the program is implemented, Covanta will continuously assess its effectiveness and review the timeline with the intention of adopting modifications, in consultation with the MA DEP, as needed.

ATTACHMENT 1
Integrated Waste Services Association
MSP IV Program