



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

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Commissioner

November 22, 2006

Matthew Hughes
Environmental Engineer
Wheelabrator Technologies, Inc.
4 Liberty Lane West
Hampton, NH 03842

Wheelabrator Technologies, Inc.
Material Separation Plan 4
MSP4 Approval

Dear Mr. Hughes:

The Massachusetts Department of Environmental Protection ("MassDEP") is approving the Material Separation Plans for the Diversion of Mercury ("MSP4") from Wheelabrator Millbury, Wheelabrator North Andover and Wheelabrator Saugus dated August 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 MSP4s have been posted on our web site:

Wheelabrator Millbury: <http://www.mass.gov/dep/recycle/solid/wheelm.htm>
Wheelabrator North Andover: <http://www.mass.gov/dep/recycle/solid/wheelna.htm>
Wheelabrator Saugus <http://www.mass.gov/dep/recycle/solid/wheels.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: Frank Ferraro, Wheelabrator Technologies, Inc.
Patrick Scanlon, MSP Coordinator
James C. Colman, MassDEP
Heidi O'Brien, MassDEP NERO
Lee Adams, MassDEP CERO

Material Separation Plan for the Diversion of Mercury

(MSP4)

January 1, 2007 – December 31, 2008

**Wheelabrator Millbury Inc.
Millbury, MA.**

August 2006

**Material Separation Plan for the Diversion of Mercury
(MSP4)**

Wheelabrator Millbury Inc. Millbury, MA.

Introduction

In 1998, the Massachusetts Department of Environmental Protection promulgated regulations governing the emissions from Municipal Waste Combustors (MWCs) [310 CMR 7.08 (2)]. Section 7.08(2)(f)(7)(a) requires that owners or operators of MWCs prepare and submit a materials separation plan (MSP) for the diversion of mercury-bearing products from municipal solid waste. MSP1 was implemented on January 1, 2000 and completed on June 30, 2002. MSP2 was implemented on July 1, 2002 and will be completed on June 30, 2004, MSP3 was implemented on July 1, 2004 and was completed on December 31, 2006.

Facility Description

The Wheelabrator Millbury waste-to-energy facility consists of two, identical mass-burn, municipal waste combustion (MWC) units, each with a capacity to combust 750 tons of municipal solid waste per day. The facility is located at along Route 20 in Millbury, MA.

Goal of the Plan

The overall goal of this Material Separation Plan (MSP) for the Wheelabrator Millbury municipal waste combustion facility is to attempt to divert mercury-containing products from the municipal solid waste stream that potentially could be delivered to the Wheelabrator Millbury facility. To accomplish this goal, Wheelabrator Millbury will attempt to educate municipal officials, school officials, health care professionals, the general public and businesses regarding the need to divert mercury-containing products from the municipal solid waste (MSW) stream and to provide a source of information concerning proper disposal. Wheelabrator Millbury also will provide resources for those that wish to properly dispose of and recycle their mercury-containing products.

Plan Development Process

The development of MSP4 was accomplished through numerous discussions with community coordinators for the Mercury Recovery Program, municipal officials in Contract Communities and Massachusetts Department of Environmental Protection staff. In addition, input was obtained from discussions with attendees at the Stakeholders meeting that took place in March 2006.

Target Sectors

The target sectors for this Plan are the general public, local Health, Public Works, Building Departments, plumbing, electrical and building contractors, and schools within the Wheelabrator Millbury service area.

Service Areas

The Wheelabrator Millbury facility serves 36 communities (see Table 1) Thirty-six communities are under contract (Contract Communities). Non-contract or "spot market" customers can vary from day-to-day and year-to-year use the remainder of the solid waste disposal capacity of the facility.

Description of Activities

a) Outreach/Education

i) Goal

The goal of the Outreach/Education portion of MSP4 is to educate the general public about the potential effects of mercury on human health and the environment. Also, its goal is to inform residents, municipal officials, health professionals, contractors and school officials about common mercury-containing products, proper handling of mercury containing devices and how to utilize the community based collection program for the proper disposal of mercury and products containing mercury.

ii) Regional Outreach

(1) General Discussion

Wheelabrator Millbury proposes to work in conjunction with the other MWCs subject to 310 CMR 7.08(2)(f) to continue the development and implementation of the regional outreach/education program.

The five MWCs subject to 7.08(2)(f) have service territories that range from the Atlantic coast to Worcester and from New Hampshire to Connecticut. All of these facilities also have a percentage of their waste coming from non-specific "markets". Therefore, the Regional outreach/education program, in addition to targeted local programs, has the ability to reach the greatest numbers of people and businesses.

To coordinate and administer this Regional program, the five MWC's have retained the services of the Integrated Waste Services Association (IWSA).

The Regional program will not target specific municipalities in Massachusetts, but will focus on development and delivery of generic messages to educate consumers and others who handle mercury products. These messages may include: identification of mercury-containing products, efforts to raise awareness of health risks of improper disposal of mercury products (thermometers, fluorescent lighting, etc.) in the normal course of residential and commercial refuse collection, and providing consumers and others who handle mercury products with information concerning the proper method of recycling and/or disposal of such products.

The Regional program will use mass communication channels to reach the greatest number of Massachusetts' citizens, as well as smaller subsets of high-end users of mercury products, with specific action steps they can take to help ensure that mercury containing products are properly recycled and/or disposed.

Although businesses may have the greatest volume of mercury-containing products to dispose of, every employer or business owner is also a consumer.

(2) Regional Outreach Programs

The following summarizes the activities to be completed by the IWSA. Each activity listed below will be implemented between January 1, 2007 through December 31, 2008. Specific timelines are provided for each activity, but times are estimates only.

Similarly target populations are provided with each activity, but given the wider reach of mass media, it is probable that people outside the targeted groups will be affected.

As requested by the Massachusetts Department of Environmental Protection and consistent with MSP3, each activity provided herein describes the activity including its education value, the targeted population, an estimated timeline for implementation, estimated cost, and an explanation of where the activity will take place (i.e., the specific medium for the message). Each activity described herein does not contain a discussion of the evaluation process, which instead is provided more generally because one evaluation tool (the research study) is used for all activities.

(i) Objectives

IWSA's Education Plan for MSP1 produced a media campaign "Keep Mercury from Rising" including newspaper and radio advertisements posters and a brochure for use by the facilities. The "Keep Mercury from Rising" campaign continued through 2006, and requires significant changes to increase its effectiveness with its targeted audience.

The 2006 Poll, provided to the Department under separate cover, gives important feedback in the development of a newer campaign. For example, 2006 polling results measured low name recognition for the "Keep Mercury from Rising" slogan, with only 21% of respondents claiming to have heard the slogan and few of those quite sure where they heard it. A sizable number of people, about 30%, reported that they did not know where their trash goes for disposal.

Equally interesting, general awareness of mercury's hazard is at its highest with 90% reporting they considered it a hazardous material. Nearly two-thirds of respondents said that exposure to mercury is a serious threat to both their family's health and the environment.

The fact of low campaign recognition with higher awareness of mercury's hazard should be considered along with the fact that people are more likely to throw away mercury-containing products. Although the polling revealed that more people today (35% of respondents) would take a broken mercury item to a hazardous waste center, more people would also throw away the broken mercury item (31% in 2006 versus 27% in 2005 and only 16% in 2004). Less people (15% in 2006 versus 25% in 2005 and 44% in 2004) would hold onto the product until the city or town had a collection day for such materials. Given the heightened mercury awareness, respondents may be choosing to immediately dispose of the broken mercury item because of higher awareness and fear.

IWSA proposes to remodel the “Keep Mercury from Rising” campaign materials based on feedback from polling, and discussions with local community officials, plant officials and the general public. The MSP4 will build upon the prior year’s work by continuing to use targeted advertising to reach communities serviced by waste-to-energy facilities. IWSA proposes a more colorful, action-oriented media campaign. Facilities will be more prominently displayed on all print and radio advertisements. Emphasis will be on the facility programs and the mercury-containing items in our trash, in particular thermostats, button-cell batteries and florescent lights. The objectives for MSP4 include the following:

- Continue to raise awareness about mercury-containing products in the home and the proper handling and disposal of these products;
- Provide information and promote local recycling events and other facility and community programs aimed at removing mercury from the waste stream;
- Rebuild an image to promote an integrated communications program that leverages opportunities for incremental, free media, and works synergistically with the efforts of individual waste-to-energy facilities.

(ii) **Tactics**

IWSA will continue targeted advertising to reach communities serviced by the facilities, as well as implement marketing of radio advertisements and live-read script to run as public service announcements. The facility through IWSA also proposes to enhance web capabilities to provide additional tools for residents in target communities to participate in recycling of mercury-containing products. IWSA also will reach out to the media to generate media coverage of the public education campaign. A great many more pictures of programs being administered and mercury-containing items will be used. The plan will be implemented using the tools discussed below.

(iii) **Evaluation Tool**

The effectiveness of all activities will be measured by a research survey. The 2007 and 2008 surveys will be completed in the first half of the year shortly after placement of paid media and compared with earlier polls to better define the audience and the effectiveness of the message and media. The polls will be designed to measure positive changes in public attitudes and behaviors, as well as the receptiveness of the message.

Timeline: The surveys are expected to go into the field in May, shortly after completion of publication of print and airing of radio media.

Activity: The survey questionnaire will time out at between six and eight minutes in length, and the study will consist of 400-500 completes, providing a + / - 4.39% error rate at a 95% confidence level. The survey will be executed via random digit dialing from electronically generated phone lists. A series of screen questions would produce the necessary targeted universe of respondents.

Cost:	<u>2007</u> \$20,000	<u>2008</u> \$20,000
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(3) Details of Activities

(i) Advertising

Radio advertising will be used. Radio is a targeted medium that provides cost-efficient mass communication and quickly builds frequency of message delivery. Radio added-value programs can provide an opportunity to interact with local communities. Print advertising will not be used for the state-wide campaign. Local facilities may publish print ads when announcing specific events, but these ads will be directed by individual facilities as needed.

Timeline: A two-week radio buy in May and September 2007 and 2008.

Activity:

- Radio: IWSA proposes to implement a two-week radio buy in May and September of each year. The buy would be scheduled to encourage mercury recycling activities and added-value opportunities (e.g., sponsorship of special broadcasts, contests, and free spots stations provide) will be considered in development and negotiation of the buy.

Cost:	<u>2007</u> \$10,000	<u>2008</u> \$0
Radio Ad Development (April)	\$103,000	\$163,000
Radio Buys		

(ii) Web-based Tools

This internet-based community information resource is available at www.keepmercuryfromrising.org. The website will be revised to reflect the new theme/campaign style and focus more on facility programs and the mercury-containing items in trash including information regarding where you might find the products in your home and where the products should go for proper disposal. IWSA will ensure the material is easy to download, and will investigate putting a “counter” on the website to see how many “hits” it receives for evaluative purposes. Facilities also will be more prominent on all pages and links.

Timeline: May, 2007 and ongoing.

Activity: Continue to build upon web-based capabilities for dissemination of information on local recycling events.

Cost:	<u>2007</u> \$20,000	<u>2008</u> \$20,000
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(iii) Print Materials

After development of a new campaign theme and layout for print materials, two types of posters will be developed for use by facilities and clients that allows for

users to put information about events on the lower half of the poster. Second, a general, more banner-like poster will be developed for use as a backdrop for events and meetings. Separate posters will be developed for three mercury-containing items: thermostats, button-cell batteries and fluorescent lamps. In addition, the more general, larger poster will include pictures of all such items.

A flyer also will be developed based on the new theme. A tri-fold brochure will be developed that focuses on the myriad of programs conducted by facilities and the mercury-containing items in trash including where you might find them and where they should be taken for proper disposal.

Timeline: Material Development: January – April, 2007
 Printing and dissemination: May, 2007 – December, 2008

Activity: Support facilities as needed with additional print materials.

	<u>2007</u>	<u>2008</u>
Cost: Material Development:	\$50,000	\$0
Printing:	\$15,000	\$15,000

(iv) Video

IWSA will investigate changes to the existing video to update information and company changes. Individual facilities will continue to disseminate the video completed in 2003 to local broadcast and cable outlets, as well as schools, libraries and other public offices.

Timeline: Ongoing

Activity: Dissemination of video as requested by facilities, local community program coordinators, public groups and the media.

	<u>2007</u>	<u>2008</u>
Cost:	\$2,000	\$2,000

3) Local Outreach Programs

(i) Objectives

The objectives of the Local Outreach Program are:

- Inform the public (local residents) within the respective MWC facility's service area regarding the potential harm mercury poses to human health and the environment.
- Identify common products that contain mercury.
- Explain the problem with improperly disposing of products containing mercury.
- Provide information about the local Mercury Recovery Program
- Provide information on the proper methods for handling and disposing of mercury containing products.

Local outreach activities will primarily include informational advertisements in local media, e.g., newspapers, regarding local mercury recycling programs such as thermometer exchange programs, mercury drop-off locations and times, Household Hazardous Waste Day collections etc., and production and distribution of other materials as needed for informing the public about mercury and the various MSP Programs.

The MSP Administrator has arranged with a news service to place ads in local newspapers. Therefore, a single ad placement will reach most, if not, all local newspapers in the Wheelabrator Millbury Contract Communities.

Budget Estimate:

(a) Production and placement of ads in local newspapers for the Mercury Recovery Program, including information about the ongoing Thermometer Exchange Program

• 4 newspaper ads per year for each community (4x 36 = 144 ads).	<u>2007</u> \$39,000	<u>2008</u> \$39,000
• Additional ads, as needed for HHW collections (Limit – one per year per community, estimated: 25 additional ads)	\$ 6,700	\$ 6,700
• Replacement of Educational Boards	<u>\$ 1,000</u>	<u>\$ 1,000</u>
Total	\$46,700	\$46,700

b) Mercury Recovery Program

(i) Objective

Since the implementation of MSP1 each community has their own locally based Mercury Recovery Program. The goal of the Mercury Recovery Program is to provide a centrally located and easily accessible site or sites in each community for the safe disposal of mercury and products containing mercury. Working closely with the Directors of Health, Boards of Health, Department of Public Works, Building Departments, other municipal officials and local residents' successful collection programs have been implemented in each community. The goal for MSP4 is to continue the development of these local collection programs in order to maximize the recovery of mercury and products containing mercury, thereby diverting these items from entering the municipal solid waste stream. The Mercury Recovery Program consists of several components as discussed below.

(ii) Community Based Collection Program

In each participating Contract Community there is at least one and often two or three collection sites. At each site there is a minimum of two five-gallon plastic collection pails, a box of plastic zip lock bags and a mercury spill kit. Once the pail is full of mercury containing devices, the coordinator at that particular site calls the 800 telephone number prominently displayed on the front of the pail for a pickup. Enviro Safe Inc. is the service provider for the program and normally will pickup the full pail within two weeks. Upon picking up the full pail, an empty pail is left at the site.

Budget Estimate:	<u>2007</u> \$16,000	<u>2008</u> 16,000
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(iii) Thermometer Exchange Program

An important component of the overall program has been the Thermometer Exchange Program. Although the number of thermometers have fallen off during the MSP3 time frame, there continues to be a steady stream of residents that exchange mercury fever thermometers each year. This program will be continued throughout MSP4. Each community will maintain a supply of new digital fever thermometers to be given to residents in exchange for glass mercury fever thermometers that they bring in for safe disposal. Additional digital thermometers will be provided to each community on an as needed basis.

Budget Estimate:	<u>2007</u> \$4,000	<u>2008</u> \$4,000
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(iv) Thermostat Program

According to the Federal Environmental Protection Agency approximately 44,000 thermostats are disposed of annually in the municipal solid waste in Massachusetts. According to the Electrical Manufacturers Association, approximately 80% of thermostats are installed by professional contractors such as plumbers, electricians, and building contractors that perform renovations.

As part of MSP2 and continued in MSP3 an aggressive program for the recovery of thermostats, focusing on contractors was adopted. Working closely with the local Boards of Health, regulations or policies banning the improper disposal of thermostats in the trash were adopted in twenty-three of the thirty-six communities serviced by the Mercury Recovery Program. In MSP4 there will be a continuation of this effort to pass the regulations in the remaining communities. Once the regulations are passed, contractors will be notified about the new local health regulation through a direct mail campaign, posters, and flyers distributed by the Health and Building Departments. They will also be informed about the potential effects of mercury on human health and the environment. In addition the mailing, posters and flyers will inform contractors of the financial penalty associated with the improper disposal of thermostats and identify the local site where they can safely dispose of used thermostats.

Annual mailings will be sent to contractors reminding them to properly dispose of thermostats.

Budget Estimate:	<u>2007</u> \$5,000	<u>2008</u> \$5,000
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(v) Thermostat Rebate Program for Contractors

In addition to the ongoing effort to encourage local Health Departments to pass regulations banning the improper disposal of thermostats and informing contractors of these regulations a new outreach effort will be undertaken to encourage contractors to properly dispose of mercury containing thermostats. Plumbing supply companies will be encouraged to participate in a rebate program for used mercury containing thermostats. Each business will be provided with collection pails for the thermostats along with flyers for distribution to

contractors. These flyers will also be used for window displays informing contractors that this business is participating in the program. The business will be reimbursed five dollars (\$5.00) for each mercury thermostat collected. In turn the business will be expected to reimburse each contractor three dollars (\$3.00) per mercury thermostat.

	<u>2007</u>	<u>2008</u>
Budget Estimate:	\$6,000	\$6,000
Plumbing Supply Collection Costs	\$5,000	\$5,000

(vi) **School Clean Sweeps**

The School Clean Sweeps Program was originally initiated in MSP1 and was continued during MSP2 and MSP3. During these plans all of the Public School Systems in the service area have conducted a clean out program. The School Clean Sweeps Program consists of an initial consultation, normally associated with a site visit. All of the schools in a particular school system are notified by an administrator of the school system of the impending site visit. Elemental mercury and devices containing mercury are identified and usually consolidated at the high school prior to the actual Clean Sweep. The School Clean Sweep Program is also a replacement program for the most common devices found in the science laboratories and nursing offices, i.e. lab thermometers, sphygmomanometers and barometers. Non-mercury replacements will be exchanged for these three mercury containing items.

MSP4 will continue offering the School Clean Sweeps Program to public school systems within the service area. On several occasions, schools that have conducted what was considered to have been a thorough clean-out of mercury and mercury containing devices, have identified additional items containing mercury requiring an additional visit to that particular school system.

An alternative Clean Sweeps Program will be available for private schools within the service area. If a private school requests assistance removing mercury or products containing mercury either directly to the program coordinator or through the community program, limited services will be offered to that institution. The program coordinator will assist in the assessment process, and if needed will conduct a mercury audit of the school. The school will be directed to transport the collected mercury products to the established community program for safe disposal. If there is elemental mercury found, or the school has a large quantity of mercury products, the program coordinator will either transport the items to the community program or arrange for free pickup and disposal service. However, in the case of private schools, the school will be responsible for the purchase of replacement products.

	<u>2007</u>	<u>2008</u>
Budget Estimate:	\$500	\$500

(vii) **Button-Cell Battery Collection**

The Button-Cell Collection Program is a voluntary program offered to each community. Small collection boxes including a colorful background that attaches to the back of the box is provided to each community. To successfully implement the program it is necessary to have an individual or organization volunteer their time to place the small collection boxes at appropriate locations throughout the community, monitor the boxes and periodically collect the button-cell batteries.

The Button-Cell Battery Collection Program has been fairly successful in the communities that have that have a dedicated and motivated “recycling committee” or other local organization willing to place the small cardboard collection boxes at appropriate locations throughout the community and collect the button-cell batteries on a fairly regular basis. One major problem is that most communities do not have a local committee or organization willing to voluntarily monitor the program and periodically collect the button-cell batteries.

It is difficult to sustain a voluntary button-cell collection program over an extended period of time. In the past local groups such as the Cub Scouts have enthusiastically participated in the program. Experience has shown that it is difficult for these groups to manage the program over a few years due to the change in leadership and the participating scouts moving on to the next level.

The Button-Cell Collection Program will be changed in MSP4. Communities will be offered the opportunity to identify a local organization that would be interested in participating in the Button-Cell Battery Program as a fund raiser for their organization. The groups would be reimbursed \$100 per pound up to a maximum of \$500.00 per calendar year. There are three prerequisites for participation:

- Sustainability – The local group will have to agree to conduct the program for at least two years.
- Monitoring – The local group will place the containers in appropriate points-of-purchase locations such as drug stores, camera stores, jewelry stores etc. along with municipal locations such as Senior Citizen Centers and Libraries. The group will then monitor the boxes on a monthly basis, collecting the button-cell batteries, putting them into a plastic bag and depositing them at the community collection container.
- Payment – The button-cell batteries will be weighed when the container is picked up by the service provider along with the normal consolidation. Depending on the frequency of collections in any given community the groups must realize and agree that payment may not occur until the end of each calendar year.

Flyers will also be designed, printed and provided to each group that will advertise the program and identifying the program as a fund-raiser for the local group. These flyers will be able to be used in the store windows and on or near the counter.

Budget Estimate:	<u>2007</u> \$5,000	<u>2008</u> \$5,000
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(viii) Miscellaneous (Bulk) Mercury Collection Program

The Bulk Mercury Collection Program was implemented in MSP2. When needed this program has been very beneficial. On three separate occasions large quantities of mercury have been identified, two of which were at private homes. The service provider was sent to each location and collected the mercury thereby assuring that the mercury did not enter the municipal solid waste stream.

The Bulk Mercury Collection Program will be continued in MSP4.

Budget Estimate:	<u>2007</u> \$500	<u>2008</u> \$500
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(ix) Fluorescent Lamp Reimbursement Program

The Fluorescent Lamp Reimbursement Program was implemented as a modification during the last few months of MSP2 and continued throughout MSP3. The goal of the Fluorescent Lamp Reimbursement Program is to maximize the recovery and safe disposal of these products. The program reimburses communities the full cost of recycling fluorescent lamps up to the amount listed in the Massachusetts Procurement Contract, which is currently 7 cents per linear foot. This program has been very successful in encouraging communities to implement fluorescent lamp collection programs. Communities normally collect fluorescent lamps from municipal buildings and throughout the school system.

Providing small businesses and residents the opportunity to easily recycle fluorescent lamps presents the biggest challenge. Most communities offer residents and small businesses the opportunity to recycle their fluorescent lamps but often on a limited basis. Unfortunately, the majority of communities are not able to offer convenient drop-off locations with regular hours. Communities will be encouraged to expand the opportunity for small businesses and residents to recycle these lamps.

One alternative for increasing the collection of fluorescent lamps from small businesses and residents is through cooperative partnerships between communities and local hardware stores. If a community is unable to provide regular opportunities for the convenient collection of fluorescent lamps, they will be encouraged to approach the local hardware store to assist in the collection of these products.

The Fluorescent Lamp Reimbursement Program specifically excludes street lamps and ballasts. All lamps must be properly packaged. Additional charges by the service provider that result from the lamps not being properly packaged and ready for shipment will not be covered. The Fluorescent Lamp Reimbursement Program will continue to be expanded in MSP4.

Budget Estimate:	<u>2007</u> \$10,000	<u>2008</u> \$10,000
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(x) Universal Waste Shed

Often communities are unable to begin or maintain a program for the collection of Universal Waste, specifically fluorescent lamps and other mercury containing devices because of lack of adequate and secure space. The Mercury Recovery Program will offer to provide each community with a Universal Waste Shed. These sheds will be delivered and erected on an appropriate site selected by the community. Each shed will have a sign identifying it as a Universal Waste Shed and will list the products considered as Universal Waste. The Sheds will be offered to each community. The priority for distribution of the sheds will be based on a community's demonstrated need for such a storage unit

<u>2007</u>	<u>2008</u>
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Budget Estimate**\$24,000****\$24,000****(XI) Expanded Service Area**

In consultation with the Plant Manager, the Mercury Recovery Program will be offered to selected communities if certain criteria are met. If it can be verified that the trash from a particular community is being brought to a particular facility, and if the hauling company guarantees that this community's trash will continue to come to the facility for at least two years the Mercury Recovery Program will be offered to that community. The decision to offer the program to a particular community will be on a case by case basis. If it is determined that a particular community will qualify for the program a modification to MSP4 will be submitted at that time.

Another option for participation in the Mercury Recovery Program by non-contracted communities will be on a pay-as-you-go basis. The community must be located within the plant's general service area. If the community suspects that some of their trash is being delivered to the plant by a private hauler but does not meet the criteria for option one, they will qualify for this option. If the community is interested in having a program for the diversion and recovery of mercury containing devices the program coordinator will assist the community in establishing a program with existing vendors. The community will pay the vendors directly for the services provided and will be responsible for the purchase of thermometers and their own promotional advertisements.

Program Administration

The Mercury Material Separation Program will be managed by the Wheelabrator Millbury facility. Wheelabrator Millbury has retained Mr. Patrick Scanlon of Scanlon Associates to conduct the general administration of the Plan. Mr. Scanlon will be responsible for ensuring the elements of the Plan are accomplished and for administering the budget. Mr. Scanlon will also coordinate with MA DEP to minimize duplication of efforts between this MSP and DEP's on-going efforts.

The administration of the Regional Outreach and Education Program will be conducted by the Integrated Waste Services Association (IWSA). IWSA has been retained to manage and provide direction to the professional outreach firm that will be developing the Regional Outreach and Education elements.

Measurement and Evaluation

Compliance with the Material Separation provisions requirements of 310 CMR 7.08 will be based upon the implementation of this Plan, e.g., implementation of a regional and local outreach program, offering a thermometer exchange program, etc. This MSP does not estimate the amount of mercury expected to be diverted or the participation rate (i.e., number of people who will be moved to action). Experience and time have prioritized activities that have the greatest likelihood of success. However, an accurate accounting of the amount of mercury diverted from trash, even in hindsight, is difficult, if not impossible. A person persuaded by this MSP's Outreach Programs to properly recycle mercury may take the product to a resource provided by a waste-to-energy facility, or may use one of a number of other means that are not evaluated by the facility's MSP. A significant amount of the mercury diverted by the Outreach efforts may be disposed or recycled in non-MSP location or as part of other collection programs. Indeed, if the education efforts provided

by this MSP are successful, consumers will hopefully purchase non-mercury-containing products to substitute for mercury-containing items.

Enviro Safe, a hazardous waste service company has been hired by Wheelabrator to service the community collection sites, school clean sweeps and bulk mercury collection programs. All mercury containing devices collected by the Mercury Recovery Program will be identified and counted. Each pail that is collected by Enviro Safe will be emptied onto a sorting table, counted and consolidated. The contents of each pail will be tabulated and the results of this process will be provided to the MADEP as part of the Program's Annual Report.

**Table 1. Contract Communities - Wheelabrator Millbury Inc.
Community Population:**

Auburn	16,216
Dover	5,986
East Brookfield	2,097
Franklin	28,500
Grafton	14,894
Holden	15,082
Holliston	13,801
Hopedale	6,000
Hopkinton	14,463
Maynard	10,370
Medfield	12,944
Medway	12,800
Mendon	6,143
Milford	26,617
Millbury	12,228
Millis	8,100
Millville	3,000
Natick	32,170
Needham	29,156
Newton	81,179
Northborough	14,129
Northbridge	13,988
Oxford	14,200
Paxton	6,000
Princeton	3,531
Rutland	5,303
Sherborn	4,552
Shrewsbury	31,161
Southborough	9,800
Spencer	11,691
Upton	7,028
Walpole	23,225
Westborough	17,997
Weston	10,660
Westwood	14,774
Worcester	<u>172,648</u>
TOTAL	712,233

Source: Population & Household Statistics, Massachusetts Department of Environmental Protection 5/30/06

MSP4 Estimated Budget including Plan Development – 2 Years

Number of Contract Communities Served - 36

2005 tons MSW processed: 469,728 tons

Budget Estimate for 2008 will change depending on total tonnage processed in 2007

Year	<u>2007</u>	<u>2008</u>	<u>Total 2years</u>
Administrative Costs			
Scanlon Associates			
Fees & Expenses	\$49,000	\$49,000	\$98,000
WTI Admin Costs	\$ 3,500	\$ 3,500	\$ 7,000
WTI Millbury Costs	\$ 5,000	\$ 5,000	\$10,000
Insurance	\$ 3,000	\$ 3,000	\$ 6,000
Programs			
Regional Outreach/Education	\$41,800	\$41,800	\$83,600
Local Outreach/Education	\$46,700	\$46,700	\$93,400
Community Collection Costs			
School Clean Sweeps	\$ 500	\$ 500	\$ 1,000
Bulk Collections	\$ 500	\$ 500	\$ 1,000
Plumbing Supply Collection Costs	\$ 5,000	\$ 5,000	\$10,000
Thermometer Exchange	\$ 4,000	\$ 4,000	\$ 8,000
Thermostat Program			
Printing & Mailing	\$ 5,000	\$ 5,000	\$10,000
Fluorescent Lamp Reimbursement	\$10,000	\$10,000	\$20,000
Universal Waste Sheds	\$24,000	\$24,000	\$48,000
Thermostat Rebate	\$ 6,000	\$ 6,000	\$12,000
Button Battery Program	\$ 5,000	\$ 5,000	\$10,000
Sub Total:	<u>\$225,000</u>	<u>\$225,000</u>	<u>\$450,000</u>
Contingency @ 5%	<u>\$10,000</u>	<u>\$10,000</u>	<u>\$20,000</u>
Total Costs:	<u>\$235,000</u>	<u>\$235,000</u>	<u>\$470,000</u>

Wheelabrator Millbury

MSP4 - Two Year Budget Estimate