

September 26, 2012

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VIA ELECTRONIC AND OVERNIGHT MAIL

Re: SEMASS Resource Recovery Facility: Material Separation Plan "6" for the
Diversion of Mercury from the Solid Waste Stream

Dear Mr. Cooper:

On behalf of the SEMASS Partnership, as it relates to the SEMASS Resource Recovery Facility (SEMASS RRF), attached is Material Separation Plan "6" (MSP6) for the diversion of mercury from the potential solid waste stream for the 5-year period of January 2013 - December 2017. This Plan has been prepared by Covanta Company of SEMASS, L.P. (Covanta SEMASS), the managing general partner of the SEMASS Partnership.

The MSP6 Plan incorporates comments received from MassDEP and MSP Stakeholders during July/August and the September 2012 Stakeholder meetings. On August 24th, MassDEP granted SEMASS a deadline extension through September 28th, 2012 for submittal of this Plan.

We appreciate the opportunity to provide the SEMASS MSP6 Plan and look forward to Department review and comment. If you have questions or need further information, contact Patti Howard, MSP Program Coordinator at (508) 962-7398 or Dan Peters at (508) 291-4436.

Sincerely,

SIGNATURE ON FILE

SIGNATURE ON FILE

Patti Howard
MSP Program Coordinator

Daniel P. Peters, P.E.
Sr. Environmental Engineer &
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Attachment

Cc: Brooke Nash, MassDEP Boston
Tina Klein, MassDEP Boston

Mark Davis, Covanta SEMASS
Tom Cipolla, Covanta SEMASS
Meg Morris, Covanta Energy
Edward Hsieh, MassRecycle

File: SEMASS / Plant / MSP



**Material Separation Plan 6
For the Diversion of Mercury
January 1, 2013 – December 31, 2017**

**SEMASS Resource Recovery Facility –
Rochester, Massachusetts**

September 26, 2012

Prepared by:

Covanta Company of SEMASS, L.P.
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MATERIAL SEPARATION PLAN 6,
January 1, 2013 – December 31, 2017
SEMASS Resource Recovery Facility – Rochester, Massachusetts

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I. BACKGROUND

In accordance with the requirements of 310 CMR 7.08(2)(f)(7), and on behalf of the SEMASS Partnership, attached is the sixth installment of the Material Separation Plan (MSP6) for the diversion of mercury and mercury-containing manufactured articles (MCMAs). MSP6 has been prepared to address the Massachusetts air regulations for municipal waste combustors noted above, guidance and technical comments from the Massachusetts Department of Environmental Protection (MassDEP), and input from Plan Stakeholders.

The SEMASS Partnership (SEMASS) owns and operates the SEMASS Resource Recovery Facility (SEMASS RRF) in Rochester, Massachusetts. Covanta Company of SEMASS, L.P. (Covanta SEMASS) is the managing general partner of SEMASS.

SEMASS provides solid waste processing and disposal services for fifty-two (52) contracted, residential community customers (SEMASS Communities) located primarily in southeastern Massachusetts, Cape Cod, and the Boston metropolitan area. Refer to Attachment A for a listing of these communities. Renewable electricity created from the processing of solid waste at the SEMASS RRF is sufficient to power approximately 75,000 households. In addition, between 35,000 and 45,000 tons of recyclable ferrous and non-ferrous metals are typically reclaimed each year from waste processing at the SEMASS RRF.

The goals of the Material Separation Plan are fourfold: 1) identify products in the solid waste stream that contain significant quantities of mercury, 2) provide the instructional and outreach support necessary to educate the SEMASS communities, their associated businesses, and the general public about the reasons to reduce mercury in the waste stream and how to recover and recycle mercury and mercury-containing manufactured articles (MCMAs) before disposal as solid waste, 3) aid the SEMASS customer base in implementing mercury removal and recycling programs, and 4) effectively manage activities related to these goals to maximize program effectiveness.

It remains Covanta Energy's firm belief that the most efficient method to prevent the disposal of mercury in solid wastes is for the manufacturers of articles containing this compound to modify or substitute other, less toxic compounds that can achieve a comparable function. However, until voluntary efforts by these manufacturers occur and/or further federal and state regulatory requirements are promulgated to achieve this objective, Covanta SEMASS remains dedicated to our continued commitment to the Material Separation Program to reduce the amount of mercury disposed in the solid waste stream.

Preparation of this Plan has been based on input received from the SEMASS communities via periodic Council of SEMASS Communities (COSC) meetings, Plan stakeholder via informal discussions during July – August 2012 and formal meetings held during September 2012, the local community Recycling Coordinators, MassDEP, and/or direct suggestions from community individuals.

II. APPLICABILITY OF PLAN BENEFITS AND PLAN EXCLUSIONS

This section clarifies who is eligible to receive Plan benefits under the MSP Program and areas where Program support is excluded.

Applicability of Plan Benefits. SEMASS’ contracted communities financially support the MSP program via language in their specific contracts with SEMASS. Therefore, these communities will receive full Plan benefits (Level 1 categorization) and this Plan is primarily targeted for their benefit. However, the MSP Program seeks to address all of the solid waste (both municipal and commercial) in SEMASS’ waste shed which can potentially include mercury or mercury-containing articles. Therefore two additional, lesser categories of support are included under MSP6 to address this. See Table 1.

TABLE 1. MSP PROGRAM BENEFIT COVERAGE

Category	Description	Plan Benefits
Level 1	<ul style="list-style-type: none"> • SEMASS Contract Communities ⁽¹⁾; Refer to Appendix A • Qualifying Recycling Organizations ⁽²⁾ that serve the Level 1 Communities. • Qualifying Businesses ⁽³⁾ within the Level 1 Communities. 	<u>Full Plan Benefits.</u> Refer to Section III for a description. Plan Benefits targeted to Specific businesses under the Program as detailed in the text.
Level 2	<ul style="list-style-type: none"> • Non-SEMASS Contract Communities that send <u>significant</u> solid waste volumes to the SEMASS RRF. • Qualifying Recycling Organizations ⁽²⁾ that serve the Level 2 Communities. • Qualifying Businesses ⁽³⁾ within the Level 2 Communities. 	<u>Limited Plan Benefits.</u> Specific, targeted activities, primarily around mercury & mercury product transport & disposal. See text discussion. Plan support to be determined on a case-by-case basis based on potential mercury amounts and if activity is in-line with Plan objectives.
Level 3	<ul style="list-style-type: none"> • Non-SEMASS Contract Communities that don’t send significant solid waste volumes to the SEMASS RRF. • Qualifying Recycling Organizations ⁽²⁾ that serve the Level 3 Communities. • Qualifying Businesses ⁽³⁾ within the Level 3 Communities. 	<u>Typically No Plan Benefits.</u> In general, no Plan benefits are provided. Exceptions may be made on a case-by-case basis as funds allow, and if the activity is in line with Plan objectives.

Notes:

(1) Includes associated municipally-supported recycling organizations.

(2) Qualifying recycling organizations are those involved with solid waste recycling, diversion, handling, transfer, or disposal activities or associated with Household Hazardous Waste events and planning.

(3) Qualifying businesses are those described in this Plan or those that may generate significant quantities of mercury or mercury-containing products that have potential for disposal in the solid waste stream.

Priority of Program Support. To the extent practical, program support will be provided in the order as follows: Level 1, Level 2, then Level 3 depending upon funding availability. Qualifying recycling organizations are those involved with solid waste recycling, diversion, handling, transfer, or disposal activities or associated with Household Hazardous Waste events and planning. Qualifying businesses are those specifically targeted in this Plan or those that may generate significant quantities of mercury or mercury-containing manufactured articles (MCMA) that have potential for disposal in the solid waste stream. Level 3 support will only be provided (on a limited case-by-case basis) when funding/resources are available and if the potential sources of mercury are significant in quantity or if the activity furthers Plan objectives.

Written requests for Plan Support. In general, requests for Plan benefits and support need to be submitted in writing (letter, FAX, e-mail, etc.) to either the MSP Program Manager or MSP Program Coordinator. This is necessary to fully document the program progress and to accurately track type of mercury articles and how they were reclaimed by Town and task. MassDEP requires this information for proper documentation of the Program annual reports issued to the Public.

Plan Exclusions. Certain items or activities are not covered under the MSP Program scope.

Wastes Not Accepted. Only quantities of pure elemental mercury or mercury-containing manufactured articles containing elemental mercury will be collected and reclaimed under this program. Organo-mercury compounds and other mercury alloys (for example, dental amalgams) will not normally be eligible for Plan benefits. These compounds will typically have to be disposed of as special and/or hazardous wastes and the usual “Universal Waste” processing means, methods and contractors that SEMASS utilizes on this program cannot reclaim these materials.

Other manufactured articles that do not contain mercury will not typically be eligible for Plan benefits under the MSP program. This may include other household hazardous wastes (paints, solvents, etc.) or other universal wastes (electronic-wastes, electronics, monitors and cathode ray tubes). SEMASS may grant exceptions to this on a case-by-case basis if it furthers the overall goals of the program. An example of this is recycling of PCB ballasts since they are frequently generated as a result of fluorescent bulb recycling activities.

Liability of Mercury Spills and/or Releases. Due to the inherent nature of the MSP program, reclamation and recycling of mercury and mercury-containing manufactured articles may result in an accidental release or spill. Covanta SEMASS, Covanta Energy, or the SEMASS Partnership will NOT be held liable for the impacts of such an incident unless directly caused by our activities. Ultimate liability for spills of these materials lies with the generators of these materials/products or the contractors who have been hired to transport and/or recycle them.

To reduce the possibility of these types of incidents, SEMASS has designed this Plan and our MSP Program to reduce the likelihood of such an occurrence. Safeguards include:

- Education and outreach performed on a regular basis through coordinated onsite visits and through workshops provided by *MassRecycle*
- General information flyers, videos, and websites to communities and businesses

- Providing local mercury handling and awareness training events on a periodic basis.
- Furnishing Universal waste sheds & safety signage for temporary storage of MCMAs
- Reimbursement of costs associated with proper secondary containment and packaging (e.g. plastic buckets, plastic bags, etc.)
- Furnishing spill kits and associated training to address small spills
- When necessary, authorizing direct Reclamation Contractor pickup of elemental mercury and large quantities of MCMAs

Should a spill event or release occur, SEMASS may provide advice, recommendations, or other actions (on a case-by-case basis) to assist a long-term community or outside 3rd party to safely and properly characterize, address, and mitigate the spill.

III. SCOPE OF PLAN ACTIVITIES

The scope of Material Separation Plan 6 (MSP6) activities are detailed below and broken down into five primary tasks: 1.0 – General Media Outreach, 2.0 – Mercury Awareness Training & Conferences, 3.0 – Community & Recycling Organization Support & Reimbursement, 4.0 – Targeted Mercury Outreach, Collection & Recycling Efforts, and 5.0 – Program Administration.

High level advertising and outreach is the focus of Task 1.0 activities. The purpose of Task 1.0 is to promote general awareness of the hazards associated with mercury, identify which products contain mercury, and promote the recycling/reclamation potential offered by the MSP Program through efforts by Covanta Energy, SEMASS and other Energy-from-Waste (EfW) facilities. Task 2.0 activities are directed towards educating and training Municipal and recycling organization staff to become more aware of mercury hazards, recognize products that contain mercury and to learn options to safely handle, store, reclaim and recycle them. Task 3.0 activities are directed towards municipalities, and their associated businesses, and recycling organizations in the SEMASS regional waste shed area. These activities are targeted for the benefit of SEMASS contract communities. These benefits include: supporting improved outreach, flyers and mailings, supporting household hazardous waste (HHW) events which are also seeking to target mercury reclamation, reimbursement of costs for recycling of mercury-containing products, and placement of universal waste sheds.

Task 4.0 activities utilize the outreach and awareness accomplished under the prior tasks to target specific sources of mercury and specify the actions to reclaim and recycle those sources of mercury. A key part of this task is to also search out and remove and recycle any last remaining sources of liquid elemental mercury within the SEMASS waste shed. Sources of liquid elemental mercury represent a potent environmental impact and have a significant chance of being improperly handled and disposed. Task 5.0 involves the administrative effort required to operate, manage and report efforts on the MSP Program.

MSP6 incorporates many of the prior activities from MSP5 but includes a number of changes discussed with Plan stakeholders during June and July visits to Level 1 municipalities and September 2012 Stakeholder meetings. These changes include the following:

- Addition of new Plan activity as part of Task 1.1 to provide 30-second commercials to air on *Comcast Spotlight* to reach all SEMASS communities (previously these commercials were only broadcast on Cape Cod).
- Addition of a new Plan activity as part of Task 1.2 for social media outreach. Social media is quickly becoming the dominant method of information transfer for younger persons who are less likely to be reached with traditional media (TV, radio, newsprint).
- Addition of new Plan activity as part of Task 2.0 for provision of a video for distribution at community cable stations explaining the proper handling of mercury containing items (including CFL's) for residents.
- Addition of a new Plan activity as part of Task 3.2 to directly incentivize and provide "rebate" payments for collection of specific mercury-containing products such as: CFL bulbs, thermometers, thermostats and switches, and blood pressure cuffs (sphygmomanometers). Rebate payments would be in addition to payment of costs for transport and disposal/recycling of the mercury-containing items.
- Expansion of Mercury device pickup (typically fluorescent bulbs) directly from school buildings as part of Task 3.3 to eliminate unnecessary handling and minimize the potential for bulb breakage.
- Addition of a new Plan activity as part of Task 4.1 for improved business outreach and mercury reclamation for general businesses with a special focus on vocational schools and trade schools to reach young people entering the work force in the areas of HVAC and electrical work.

MSP6 presents a variety of Plan activities so that participating communities and their associated recycling organizations and businesses can choose a wide variety of options to implement mercury recovery and recycling in a manner that best suits their needs. SEMASS continues to find that providing participants with a flexible approach has been a key ingredient for continued success of the Plan's implementation. Covanta SEMASS will continue to adapt and modify Plan activities and shift funds throughout the duration of this Plan in search of a maximum level of efficiency on program implementation.

Documentation of Mercury Amounts and Mercury-Containing Manufactured Articles (MCMA). In accordance with directives issued by MassDEP during MSP5, measurement and reporting of elemental sources of mercury will be conducted by a) obtaining direct weights of the quantity of mercury itself when possible or b) counting the mercury-containing articles and applying standard conversion factors. In order to minimize the exposure risk to reclamation personnel and others and spill potential, mercury-containing containers and products will not be opened. Tare weights of the containers or products holding the elemental mercury will be estimated to the degree practical.

Unless otherwise noted, SEMASS will utilize the standard conversion factors for mercury-containing products developed by the Northeast Waste Management Officials' Association (NEWMOA) and detailed in Table 2, below.

Please note that the Department and NEWMOA have not yet agreed upon standard conversion factors for the some of the mercury-containing products that SEMASS may encounter during MSP6 (for example, high intensity tanning salon fluorescent lights). SEMASS will assume conversion factors based on best available technical information or utilize direct measurements, if possible. These factors are detailed below and will be listed on annual report tables to clarify the assumptions used.

TABLE 2. CONVERSION FACTORS FOR MERCURY-CONTAINING MANUFACTURED ARTICLES

Name of Mercury-Containing Product:	Quantity of Mercury: ^(a)
Fluorescent Lamps (straight)	0.005 grams (5 mg) per Linear Foot of Lamp
Glass Fever Thermometers	1 gram per unit
Laboratory Thermometers	3 grams per unit
Blood Pressure Cuffs	110 grams per unit
Barometers	500 grams per unit
Tanning Bed Bulb	0.030 grams (30 mg) per unit (per 6-ft bulb) ^(c)
Thermostats (Residential & Commercial)	4.5 grams per unit
Mercury Switches	8 grams per unit ^(b)
Float Switches	4.5 grams per unit ^(b)
Mercury Button Cell Batteries	0.009 grams (9 mg) per unit
U-Tube Fluorescent Lamps	0.0175 grams (17.5 mg) per unit ^(b)
Circular Bulb Fluorescent Lamps	0.0175 grams (17.5 mg) per unit ^(b)
Compact Lights	0.0175 grams (17.5 mg) per unit ^(b)
HID Lamps	0.035 grams (35 mg) per unit ^(b)

Notes:

- a. Source of factors: NEWMOA factors contained in MassDEP letter to SEMASS dated 2/18/04.
- b. Assumed factors utilized during MSP2 by SEMASS.
- c. Assumed factor utilized during MSP5 by SEMASS.

1.0 GENERAL MEDIA OUTREACH

Objectives. MassRecycle, Inc., the statewide 501(c)3 nonprofit coalition dedicated to waste reduction, will administer and enhance programs as part of Task 1.0. The goal of the regional activities is to promote general awareness of hazards associated with mercury, identify which products contain mercury, and promote the recycling/reclamation potential offered by the Covanta SEMASS MSP Program. The overarching goal of this Task is to change behaviors of

the general public around the handling and disposal of mercury-containing products. Attainment of these goals will be quantified via a statewide survey.

As part of Task 1.0, MassRecycle will adopt and expand the framework of the “Keep Mercury from Rising” media campaign, previously administered by the Energy Recovery Council (ERC). MassRecycle will manage radio and television advertising buys and explore expansion to additional media outlets. The advertising campaign will be further expanded via a targeted social media campaign to ensure maximum saturation within the SEMASS region and to reach a target audience that may not use traditional media (radio, TV, newsprint).

MassRecycle will gage the effectiveness of the advertising campaign via regular field polling in the SEMASS region. The field polling will be expanded for at least one year to cover the entire Commonwealth of Massachusetts in collaboration with MassDEP. The survey for that year will include additional questions on hard-to-handle materials beyond mercury as well as examine the uptake of newer techniques of recycling.

As a local nonprofit, MassRecycle has the resources to produce comparable outreach efforts in a cost-effective manner and with a more tailored, local message. Prior activities that will be carried over from MSP5 include:

- Radio advertising for the “Keep Mercury from Rising” campaign
- Local access television advertising for the “Keep Mercury from Rising” campaign
- Field polling to determine the impact of the “Keep Mercury from Rising” campaign
- Targeted training focused on mercury

In addition, for MSP6, MassRecycle plans to explore and implement an expansion of activities to increase the outreach and impact of MSP6. This will include:

- Analyzing existing radio and television buys and adding additional media outlets
- Revamping existing advertising content
- Expanding regional outreach and education via a social media campaign
- Expanding the field polling to all of Massachusetts and including further survey questions on other hard-to-handle materials in collaboration with MassDEP
- Including MSP awareness and training in MassRecycle events and venues, especially those targeted at schools
- Including MSP information on MassRecycle’s new website and wiki

1.1 Traditional Advertisement (Cable TV, Radio)

Traditional radio and cable television advertising will continue to be utilized to effectively and quickly target large segments. Advertisements will be run on cable channels and radio stations with high adoption rates in the SEMASS region. MassRecycle will review existing advertising content to determine if the content needs to be refreshed and updated. This analysis will occur in collaboration with the *pro bono* design group *Catchafire*.

MassRecycle will also examine if the advertising buys are at a fair market price and if other cable providers and radio stations should be included. Currently, only Comcast and Univision run the ads. Verizon and RCN have increasing uptake in the state. Radio stations that currently

run the ad in the SEMASS region include WBZ, WEEL, WMJX, WWZN, WQRC, WCOD, WXTK, and WPLM. MassRecycle will determine if other radio stations such as WBUR or WGBH or a large media company like Clear Channel would be cost effective.

Activity Scope. MassRecycle will run a two-week radio buy in May and September each year during MSP6. A parallel two-week television buy will also run during the same times. Dependent on the results of the analysis and negotiations with different outlets, additional buys may occur.

Timeline: MassRecycle will analyze the potential to expand during the first quarter of 2013 and on an ongoing basis for the remainder of the Plan. Refinement of the advertising content will begin in 4th quarter 2012 and continue into the first quarter of 2013.

1.2 Social Media Outreach (Twitter, FaceBook, etc.)

MassRecycle will expand the MSP program education and outreach via a targeted social media campaign. MassRecycle has been testing advertising targeted by zip code on FaceBook with great success, nearly tripling its own FaceBook membership in a month with the ads.

Activity Scope. MassRecycle's tests have demonstrated that a reasonable target to start with is 500 clicks per month. The ads can also be tracked by impressions, but tracking this way appears to be less representative of effectiveness and more costly.

Using FaceBook targeted campaigns also increases the exposure to younger generations, as people move more towards Internet-based mediums. The ads will be developed by MassRecycle in collaboration with Catchafire and be consistent in style and theme with the traditional advertisements.

Timeline: The development of the social media content will occur in late 2012, with an initial small test run of at minimum 250 clicks. Starting 2013, MassRecycle will launch full-scale with the goal of 500 clicks per month. The "per click" goal will be analyzed on a rolling basis and increased when appropriate.

MassRecycle Website. MassRecycle launched a new interactive website and portal in 2012. Included in this website is a wiki section that is under development. MassRecycle will include in this section a resource guide on handling mercury-containing wastes with direct links to the "Keep Mercury from Rising" website as well as to Covanta SEMASS contact information related to MSP services.

Timeline: The website is being developed on an ongoing, iterative basis. The framework for the wiki is already in place, but this is subject to change depending on other projects. Regardless of changes to the framework, the content will be loaded by early 1st Quarter 2013 and updated regularly.

1.3 Mercury Surveys

Activity Scope. MassRecycle will measure the effectiveness of the MSP activities via a regular survey, with a minimum of at least three (3) surveys in the MSP6 five-year span. The poll will be designed to measure positive changes in public attitudes and behaviors, as well as receptiveness of the message.

MassRecycle, in collaboration with MassDEP, plans on expanding one of the three surveys to a statewide survey that includes further questions on other hard-to-handle materials, as well as general recycling questions designed to examine the uptake and impact of newer recycling approaches such as single stream or PAYT.

The two SEMASS-specific surveys will include at least 400 completed interviews with Massachusetts residents and be approximately twelve minutes. Results will be at a 95% confidence level with a margin of error within +/-5%. The expanded survey will guarantee the same level of responses as the SEMASS-specific surveys for the SEMASS region. Additional response levels will be negotiated with MassDEP. The target audience for the expanded survey may be shifted more towards municipal and facilities administrators.

Timeline: The first survey will likely be the expanded survey and is targeted for late 2013. The additional two SEMASS-specific surveys will be completed in the first half of 2015 and 2017 after placement of the Spring media buys.

1.4 “Keep Mercury from Rising” Website Support.

Activity Scope. Covanta SEMASS will continue to utilize the *Keep Mercury from Rising* website (www.keepmercuryfromrising.org) as a method for documenting relevant information related to mercury, mercury-containing products and the MSP Program. SEMASS anticipates that the Energy Recovery Council (ERC) will continue to lead efforts for maintenance and update of this website. Other Massachusetts Energy-from-Waste (EfW) facilities that are implementing MSP6 (Covanta Haverhill and the Wheelabrator Technologies facilities) may also be contributing to this effort in a joint approach.

The website reflects the new theme/campaign style and focuses 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 and provides additional links to other information resources.

Timeline: January, 2013 and ongoing.

2.0 MERCURY AWARENESS TRAINING & CONFERENCES

Objectives. The objective for Task 2.0 is to provide training to municipal and school staff plus any associated recycling personnel, and target business managers or staff for proper handling and storage of mercury-containing devices prior to pickup and recycling. During MSP5,

MassRecycle collaborated with Covanta SEMASS to provide training sessions for communities and businesses in the entire Commonwealth. Due to modest attendance levels, it appears that in person training workshops specifically around mercury are less in demand.

Therefore, as part of MSP6, mercury awareness training will be held in conjunction with other MassRecycle training and conference events as an additional training option for MSP Stakeholders. This is expected to significantly increase attendance and impact of the mercury training, yet still be cost effective.

Activity Scope. MassRecycle will plan to include mercury-related trainings at its annual conference. Workshops throughout the year will also integrate mercury training where appropriate. MassRecycle will also include the trainings at its annual School Summit to better reach the less tapped groups of school educators and support staff. In addition, as described under Task 1.2, MassRecycle's new website and wiki will also make any mercury training documents available for download.

Covanta SEMASS will augment MassRecycle's training efforts by continuing to offer in person, 1-on-1 mercury awareness training to municipal staff (Board of Health, Department of Public works, School staff, etc.) via direct visits to municipalities. This will be provided upon request.

Timeline: The MassRecycle School Summit and annual conference both occur in the Spring each year. Additional MassRecycle-sponsored workshops occur throughout the year, so activities will be ongoing with the primary conferences and training sessions held during the Spring and Fall periods each year. Covanta SEMASS will provide in person, 1-on-1 training as needed throughout the year.

3.0 COMMUNITY & RECYCLING ORGANIZATION SUPPORT AND REIMBURSEMENT

Objectives. The objective for Task 3.0 is to provide a 1-stop task where any municipal needs on the MSP program are satisfied. This includes outreach materials, incentive and rebate programs for mercury device recycling, reimbursement of costs for mercury-containing items transport, and disposal/recycling, plus placement of new universal waste sheds to promote expanded recycling efforts.

SEMASS will continue efforts begun during MSP5 for community outreach including the following:

- Routine Communications. Continue to seek feedback/communications with the SEMASS contract communities and discuss any MSP issues or concerns as part of the normal process of SEMASS interactions with our contract communities that occur in parallel with the MSP Program.
- COSC Meetings. The MSP Program Coordinator and/or Covanta Energy and SEMASS Personnel will continue to give presentations and program updates at any Council of

SEMASS Community (COSC) meetings, to explain the opportunities of the MSP program and to encourage participation

- New MSP6 Plan. SEMASS will provide a copy of the MSP6 Plan (once approved by MassDEP) to each of the contacts within SEMASS' geographic area, making them aware of the activities available with the program. Copies will be provided by one of the following means: direct mailing, electronic mailing, or directing Stakeholders to web-sites where they can download a copy of the entire Plan.

SEMASS will strive to improve communications with our municipal contacts on the program. The key component of this is maintenance of the master mailing/distribution list which details municipal contacts in the SEMASS contract communities. Key activities include:

- Issue periodic requests for updates/changes to the master mailing list (names, addresses, e-mail address, etc.)
- Add e-mail distribution of documents & mailings when possible rather than paper (.e.g hardcopy) to promote environmental stewardship on the MSP program and for more direct distribution of key information.
- Seek to develop a program website or electronic bulletin board where Plan Stakeholders can download key documents (MSP6 Plan, annual reports, surveys, etc.) and be provided with periodic updates and information.

3.1 Community Outreach, Booklets & HHW Support (Flyers, Mailings).

SEMASS will conduct activities to support the communities, their schools and any associated municipal recycling organizations in the goals of education, outreach, and removal of mercury-containing products. The primary purpose of this subtask will be to assist each community in their preferred methods of information dispersal. In addition, the MSP Program Coordinator will offer guidance along with the proper tools (e.g., training sessions, supplies) and advertising to conduct outreach on the Plan in an attempt to ensure successful mercury-reclamation programs.

SEMASS may also provide supplemental funding for appropriate newsletter and/or pamphlet distributions or other forms of advertising such as local print ads, sandwich boards, etc. In the past, communities have requested funding for direct mail pieces, locals ads and/or signage that have provided notice for Household Hazardous Waste (HHW) or other specialized collection events (e.g. thermometer exchanges, etc.). SEMASS will continue this activity during MSP6. Flyers, notices, or other pamphlets will need to include wording and/or appropriate illustrations, photos or diagrams indicating the need for identification, diversion, and recycling of mercury or mercury-containing products to qualify for funding support through the MSP program. SEMASS may request specific edits or changes to the documentation so that the overall message meets the intent of this Plan.

Residential participation at HHW events has been shown to be a successful tool in diverting mercury from the waste stream as well as other potentially harmful items and products. The funding of these direct mail distributions has been an important component towards the success of the HHW events.

Activity Scope. SEMASS will assist in the development, funding, printing and/or mailing of customized, direct mail pieces, flyers, booklets, bills, posters and other written materials that address mercury and the diversion of mercury-containing items articles in support of MSP program efforts. These efforts will be augmented by SEMASS' consultant, Center for EcoTechnology (CET), who has designed municipal outreach booklets for municipalities in the past that document a variety of key information and contacts for residents. CET can provide similar templates to interested SEMASS communities.

SEMASS will require written requests for support from municipalities or associated recycling organizations for support under this task. These activities will be evaluated on a case-by-case basis with regards to the applicability to the diversion of mercury or mercury-containing products from the waste stream as well as the anticipated degree of enhancement for a overall mercury and MSP program outreach.

In general, support under Task 3.1 is applicable to Level 1 Communities only, unless other rationale or circumstances could be providing to qualify for support for lower Level municipalities. Refer to the Plan discussion in Section II.

For purposes of MSP6 budgeting, this task includes scope for supporting up to thirty (30) municipal requests per year at an average rate of \$1,500.00 each. Additional funding is provided for SEMASS support and coordination of scope activity and requests as set forth below.

- Municipal Visits & Follow-up. SEMASS may generate interest in these outreach activities through a combination of phone calls, letters, or in-person visits. Should opportunities present themselves, SEMASS may also award grants and other funding so that mercury awareness and education are incorporated into municipal school curricula.
- SEMASS and Covanta Facility Tours. When appropriate, tours of the SEMASS RRF or its auxiliary facilities (landfill, transfer stations, convenience drop-off centers, etc.) will be conducted on behalf of these groups to educate the public on the combined roles of the Energy-from-Waste (EfW) facilities and the MSP program in diverting mercury-containing products from the solid waste stream. Tours are very popular with school groups and other social groups and represent an excellent opportunity for MSP and mercury outreach on a personal basis.
- COSC Meetings. This task also includes scope and effort for attendance at Council of SEMASS Communities (COSC) meetings to discuss and present the results of the program-to-date, encourage feedback and comments, and, if necessary, to modify the program to better customize it to community needs and requests. Program updates will be provided to discuss the current status. The frequency of COSC meetings can vary between zero, one, or two or more times per year depending on community issues of concern. For the purposes of the MSP6 Plan, SEMASS will provide MSP program

updates at a minimum of once per year, if COSC meetings are not held. These updates will take the form of a program summary update document sent via one of the following techniques: regular mailing, electronic mailing, posting to website.

SEMASS may also attend and/or sponsor booths at local (Massachusetts or New England) environmental conferences and/or organizational meetings for the purpose of further extending the efforts by ERC detailed in Task 1.0 as well as the program opportunities offered by the Plan. Some of the potential local conferences or organizational meetings include the following:

- Northeast Resource Recovery Association
- Massachusetts Municipal Association
- Solid Waste Association of North America: Regional & Local Chapter Meetings
- Waste Expo
- MassRecycle conferences or Expos
- MassDEP Conferences and Meetings

Timeline. Efforts for this activity will be ongoing throughout the period of the Plan. Requests for updates of the master mailing list may be conducted during periodic Council of SEMASS Communities (COSC) meetings or via other means or meetings.

3.2 Mercury Device Incentive & Rebate Program

The primary purpose of this subtask will be to provide direct, financial rebates for quantities of collected and recycled mercury-containing products as a means to incentivize collection programs by municipalities, recycling organizations, and other groups and individuals. During past MSP Plans, non-mercury containing items were furnished by SEMASS as part of exchanges (for example, thermometer exchanges). The rebate program is intended to replace that function.

Activity Scope. SEMASS will offer the following direct incentives & rebates for specific targeted mercury-containing items:

Mercury-Containing Item	Rebate Rate (\$ / item)	Max. No. of Hg Items for Rebate per Year
Compact Fluorescent Light (CFL) bulbs	\$0.10 / bulb	15,000
Thermometer (4" or 12")	\$ 1.00 / each	3,000
Thermostats (residential)	\$ 3.00 / each	4,000
Hg Switches, Industrial Switches, Float Switches	\$3.00 / each	1,000
Blood Pressure Cuffs (sphygmomanometers)	\$ 10.00 / each	100

Rebate payments will be made on a first come, first-served basis as they are received by SEMASS until funding is exhausted. Requests for rebate payments will need to be submitted in writing and include appropriate documentation of the collected and recycled mercury devices. Documentation can include bills of lading from recycling contractors or other, similar backup.

In general, support under Task 3.1 is applicable to Level 1 Communities only, unless other rationale or circumstances could be providing to qualify for support for lower Level municipalities. Refer to the Plan discussion in Section II.

Continuation of MSP5-Type Exchanges. If a municipality or its associated recycling organization prefers receiving non-mercury containing items (for example, non-mercury thermometers, thermostats or BPCs) in place of a direct rebate payment, than Covanta SEMASS will strive to meet these requests. This is to provide a continuation of the “exchange” events (for example, thermometer exchange) that occurred during earlier MSP Plan efforts should a municipality prefer this approach. SEMASS will provide either a direct payment for purchase of the non-mercury items or provide the non-mercury items directly to meet these requests.

Timeline. Efforts for this activity will be ongoing throughout the period of the Plan. Rebate payments will be provided on an ongoing and first-come, first-served basis dependent upon collection and recycling activity.

3.3 Mercury Recycling, Transport & Disposal Costs Reimbursement

The primary purpose of this subtask is to provide trained and certified contractor pickup, transport and disposal/recycling of mercury and mercury-containing items collected by municipalities, schools, and associated recycling organizations. Use of a properly-certified contractor is critical to conduct a safe pickup as well as to properly document the collected devices as required by MassDEP’s annual program reporting. SEMASS can reimburse municipalities, schools or organizations for their mercury costs or fund your selected recycling contractor by direct payment.

Reimbursement of associated costs are included in this task. Costs for “counting” mercury-containing devices and transport/pickup fees are reimbursable under this task. Costs for packaging (i.e. Ziplock bags, buckets, fiber drums, boxes, labels, etc.) to properly contain and label mercury-containing items are also reimbursable under this task. Costs for mercury spill kits are reimbursable under this task.

Costs for non-mercury “universal waste” items (lead-acid batteries, Cathode Ray Tubes or CRTS, flat screen televisions, computers, computer monitors, non-mercury batteries, phones & electronics) are NOT reimbursable as part of the MSP program. An exception to this is PCB ballasts, which are typically collected during fluorescent bulb recycling. SEMASS will reimburse costs for PCB ballast recycling unless funds become exhausted on this task.

Special contractor pickups are available for liquid elemental mercury sources that are found within Level 1 or Level 2 communities. Liquid elemental mercury represents a significant hazard for proper storage and labeling. Handling should be minimized to reduce the likelihood

of a spill. Once notified, SEMASS will promptly direct our recycling contractors to drive directly to the location with the known liquid mercury source and provide immediate containment, packaging, and recycling support. We strongly advise our Stakeholders to notify SEMASS of any liquid elemental sources promptly, so that immediate pickups can be scheduled.

In general, support under Task 3.3 is applicable to Level 1 and Level 2 Communities. Support for Level 3 Communities would require special circumstances or rationale. Refer to the Plan discussion in Section II.

Activity Scope. Funds are included in the MSP6 budget for the following contractor support detailed below. Additional funds are included for SEMASS coordination and reimbursement repayment:

- Contractor support for ten (10) large towns at a rate of \$3,500.00 per town, per year
- Contractor support for forty-two (42) smaller towns at a rate of \$1,000 per town, per year

Timeline. Efforts for this activity will be ongoing throughout the period of the Plan.

3.4 Universal Waste Sheds.

SEMASS will continue to offer sheds to eligible communities or to those communities who show a true need for the use of additional sheds to be placed at schools and/or municipal buildings for the proper reclamation of mercury-containing articles or to replace a prior shed which is no longer functional. The placement of sheds in additional, key areas could potentially assist the SEMASS communities in the collection and temporary storage of mercury-containing products.

Additional efforts for various shed maintenance support including: additional hazard communication signage, replacement spill kits, and testing materials to confirm/deny if a mercury spill has occurred. SEMASS will continue this support during MSP6.

Activity Scope. Scope is included in this Plan for SEMASS to purchase and place up to six (6) Universal Waste Sheds per year. In addition, additional scope is provided in this Plan to provide signage, and mercury spill kits to those participants who request them with their new sheds.

Timeline. This activity will be ongoing throughout the period of this Plan.

4.0 TARGETED MERCURY OUTREACH, COLLECTION & RECYCLING EFFORTS

Objectives. Task 4.0 involves targeted Plan activities that result in identification, location, separation, handling, transportation and recycling of elemental mercury or mercury-containing products. Subtasks are targeted to particular areas where further sources of mercury or mercury-containing products may be found.

4.1 HVAC Contractors, Builders & Plumbers

This task is a continuation of previously successful efforts initiated on MSP5. These contractors have been successfully targeted in the past to identify and recover substantial quantities of thermostats, industrial switches and other electrical switches containing mercury. Reaching contractors, builders and renovation specialists is an important strategy to successfully capture mercury-containing thermostats. Efforts will be led by the Center for EcoTechnology (CET).

Activity Scope. CET will perform targeted outreach through their existing HVAC and contractors training services. There are already specific targeted training sessions for these professionals in development and CET will seek to “piggyback” on these opportunities. CET also produces regular electronic newsletters to these professionals and thermostat recycling program opportunities under the SEMASS MSP6 Plan will be highlighted through this newsletter service. CET will use these efforts to focus on face-time with contractors to build a relationship and engage them in the MSP Program activities. Specific Scope items include:

- Conduct an “HVAC-day” by tabling at wholesale HVAC distribution stores and/or other distribution outlets where these professionals shop. CET will use an existing network of contacts with these types of locations throughout the state to coordinate a specific outreach to connect with contractors. Per CET, this approach should be productive since, HVAC professionals typically have a close and trusting relationship with their wholesale providers.
- Through existing relationships, CET will work closely on thermostat reporting goals with their partners, TRC, Honeywell, NEMA, etc. The goal will be to confirm thermostat recycling activities within the SEMASS communities that may be already occurring but not yet documented in MSP reporting.
- CET will conduct Outreach within existing community groups, Home Builders Association, Health Departments, etc. to identify other sources of thermostats.

Timeline. The timeline for this activity will be ongoing throughout the period of the Plan.

4.2 Tanning Salons & Associated Bulb Suppliers

In conjunction with CET, SEMASS will continue the targeting of tanning salons begun during MSP5 and also seeking to interface with tanning bed bulb suppliers. CET will lead these efforts on behalf of SEMASS. The intent will be to convince tanning bulb suppliers to properly recycle their bulbs and not dispose in the solid waste stream.

Activity Scope. CET will continue outreach to tanning salons, and especially tanning bulb suppliers in order to promote proper recycling of UV lamps and increase their recycling rates within the SEMASS communities.

Timeline. The timeline for this activity will be conducted throughout the year.

4.3 Boards of Health, Fire Departments & Elemental Mercury Sources

Task 4.3 is a continued effort to locate, identify, properly contain, and pickup/recycle any remaining liquid elemental mercury sources within the SEMASS waste shed. Liquid elemental mercury sources remain a potent hazard for the MSP program with a high probability of improper storage, disposal within the solid waste stream, as well as hazards for spills and exposure to human health and the environment.

It has been SEMASS' experience on the MSP program, that sources of liquid elemental mercury still exist in our waste shed despite our best efforts. Frequently, these are found in business and residential settings where the generators know "they shouldn't throw it out" but they lack the information to know what to do with the material.

Activity Scope. CET will lead outreach efforts to identify any town departments, schools, associated businesses or residents that may know of any sources of liquid elemental mercury. Key municipal departments that CET will interface with include Boards of Health, Building Departments, and Fire Departments. Any leads will be investigated and followed up by CET.

If sources of liquid elemental mercury are identified, SEMASS and CET will take immediate action to locate, contain, and secure the material for pickup by our recycling contractors.

Timeline. The timeline for this activity will be conducted throughout the year.

5.0 PROGRAM ADMINISTRATION

Activity Scope. General administrative activities required to operate the MSP6 program activities will be conducted as part of Task 5.0. Activities include:

- Tracking of program costs
- Review of reclamation records and preparation of estimates for mercury reclaimed
- Processing of funding requests
- Routine copying, filing & recordkeeping
- Sub-contractor management
- Processing billing for accounts receivable and accounts payable
- Periodic internal program meetings, management oversight and status reporting.
- Meetings with MassDEP
- Preparation of the MSP Program Annual Report
- Preparation of letter(s) & responses to MassDEP technical comments or program information requests
- Preparation of the MSP7 Plan (if required) for Plan activities beyond MSP6 Plan

Timeline. The timeline for this activity will be ongoing throughout the period of the Plan.

IV. PROGRAM REPORTING AND SCHEDULE

Program Reporting. SEMASS will prepare and submit annual reports to MassDEP summarizing the results of the Material Separation Plan Program. These annual reports will be based on a calendar year basis (January through December) and be submitted by February 15th of the year following or by an alternate schedule approved by MassDEP. Reports will include a description of activities completed by task, mercury amounts reclaimed on the program and costs expended. Mercury amounts will be broken down by type of mercury articles and elemental mercury in two matrices: 1) mercury devices/amounts by SEMASS contract community and 2) mercury devices/amounts by Plan Task. Costs expended will be compared versus costs budgeted and significant differences will be detailed in the annual report text.

Program Schedule. Activities related to MSP6 will be five (5) years in duration and will begin on January 1, 2013 and continue through December 31, 2017.

V. PERSONNEL

Implementation of the Material Separation Plan requires the efforts of a variety of professional, contractor and supporting organization personnel. Key Parties include the following:

SEMASS

- MSP Program Coordinator. SEMASS will continue to provide a Material Separation Plan (MSP) Program Coordinator to oversee and administer the activities described within this Plan. SEMASS will also provide support to the MSP Program Coordinator in the form of office space, administrative support, and administrative logistics (e.g., telephone, copiers, printers, computer, IS Support, fax machine, etc.) necessary to execute this Plan.
- Program Technical & Management Oversight. Technical and management oversight will be provided on a periodic basis by Covanta Energy and SEMASS personnel to monitor and guide successful implementation of the MSP Program. This oversight support may include personnel with managerial, technical, environmental, legal, and financial backgrounds.

Covanta Energy. SEMASS personnel may work co-operatively with other Covanta Energy facilities in Massachusetts. SEMASS may team up to sponsor joint outreach activities or combine on other program tasks if co-operative efforts further Plan goals and objectives.

Contractor, Consultant, and Organization Support. SEMASS will employ outside contractors, consultants, and other organizations in the implementation and other facets of the activities associated with MSP6, as indicated in the Plan. Major contractors, consultants, or organizations (CCOs) that SEMASS may employ are listed below. SEMASS reserves the right to change, add, eliminate, or amend CCOs as required, for successful implementation of the MSP Program.

- Mercury Handling, Pick-Up, Packaging & Disposal. SEMASS will utilize multiple contractors to conduct the field activities associated with pick-up, packaging, transport and reclamation/recycling of mercury and mercury-containing articles. Two contractors that have been used in the past include: 1) Complete Recycling Solutions (CRS) of Fall River, MA and 2) Veolia Environmental Services (VES) of Stoughton, MA.
- General Media Outreach. SEMASS will utilize MassRecycle, Inc. of Cambridge, MA, the statewide 501(c)3 nonprofit coalition dedicated to waste reduction, to lead the activities associated with cable TV and radio advertisement, social media outreach, and the statewide mercury survey. The Energy Recovery Council (ERC) of Washington, DC will be used to maintain the “Keep Mercury from Rising” website (www.KeepMercuryFromRising.org) which presents a variety of mercury-related information for Public Use.
- Mercury Awareness Training & Confererences. In instances where supplemental training is conducted under the MSP Program, MassRecycle will be utilized. This organization specializes in conducting a wide-variety of training and conferences associated with the solid waste field. Specialized training for awareness, hazard recognition, handling, packaging and transport of mercury and mercury-containing products will be added to this training. SEMASS personnel will assist MassRecycle, as needed, for mercury training.
- Community Support and Targeted Mercury Outreach and Collection. SEMASS will utilize the Center for EcoTechnology (CET) of Northhampton, MA to lead targeted efforts on designing Municipal outreach booklets and well as targeted mercury outreach and collections with businesses such as heating, ventilating, and air conditioning (HVAC) contractors, tanning salons, and other businesses that may have significant sources of mercury or mercury-containing products.

Supporting Organizations. SEMASS may work in conjunction with the following supporting organizations to help co-operatively accomplish Plan activities.

- Regional Recycling Coordinators/Organizations. SEMASS may work with Municipal Recycling Coordinators in each of our contract communities as well as regional recycling organizations. Examples of these include:
 - South Shore Recycling Cooperative (SSRC) of Dover, MA representing several SEMASS south shore communities
 - University of Massachusetts Cape Cod Cooperative Extension (CCCE) of Hyannis, MA representing SEMASS communities on Cape Cod and Martha’s Vineyard
 - Cape Light Compact of Barnstable, MA for fluorescent & compact fluorescent bulb recycling.
 - MassDEP Municipal Assistance Coordinators for the Southeast 1 District (SE1) which encompasses Cape Cod & the Islands communities, Southeast 2 District (SE2) which includes the South Coast and Bristol County communities on an approximate north-south dividing line west of Route 24, and Southeast 3 District

(SE3) which encompasses the South Shore, Plymouth County, and South Coast communities on an approximate north-south dividing line east of Route 24.

- The Carver-Marion-Wareham Regional Refuse Disposal District (CMWRRDD), Marion, MA which oversees waste disposal and recycling for the SEMASS host communities of Carver, Marion, Wareham, Rochester, and Mattapoisett.
- General Program Assistance. SEMASS will continue to work with staff from the Northeast Waste Management Officials' Association (NEWMOA) of Boston, MA for general assistance with MSP6 initiatives and efforts.
- Thermostat Recycling. SEMASS may seek co-operative efforts with the Thermostat Recycling Corporation (TRC) of Rosslyn, VA for assistance with municipal and commercial, thermostat reclamation and recycling.

VI. PROJECTED PLAN BUDGET

The projected budget based on the scope set forth for the five (5) year period of this Plan (2013 - 2017) is detailed in Table 3, below.

TABLE 3. PROJECTED MSP6 BUDGET BY TASK

Task No.	Plan Activity:	Average Yearly Expenditures
1.0	General Media Outreach	\$ 51,093
1.1	Traditional Advertisement (Cable TV, Radio)	\$ 20,615
1.2	Social Media Outreach (Twitter, Facebook, etc.)	\$ 13,355
1.3	Mercury Surveys	\$ 10,404
1.4	"Keep Mercury from Rising" Website Support	\$ 6,719
2.0	Mercury Awareness Training & Conferences	\$ 25,003
3.0	Community & Recycling Organization Support & Reimbursement	\$ 216,683
3.1	Community Outreach, Booklets & HHW Support (Flyers, Mailings)	\$ 70,055
3.2	Mercury Device Incentive & Rebate Program	\$ 41,618
3.3	Mercury Recycling, Transport & Disposal Costs Reimbursement	\$ 87,395
3.4	Universal Waste Shed Placement	\$ 17,615
4.0	Targeted Mercury Outreach, Collection & Recycling Efforts	\$ 36,530
4.1	HVAC Contractors, Builders & Plumbers	\$ 15,735
4.2	Tanning Salons & Associated Bulb Suppliers	\$ 10,068
4.3	Boards of Health, Fire Departments & Elemental Mercury Sources	\$ 10,728
5.0	Program Administration	\$ 33,693
Grand Total:		\$ 363,000

This budget includes payments to Plan contractors, consultants, and organizations (CCOs), direct reimbursement costs for municipalities, purchase of supplies and materials, travel and outreach activity costs, local advertising, mailing, postage, copy costs, and internal labor.

Internal labor primarily includes the MSP Program Coordinator, MSP Program Manager, Administrative Support, other Environmental Dept. support, plus a limited amount of SEMASS Facility Management time. Internal labor is not allocated to any single task but rather allocated to each of the tasks as necessary to conduct the work. Similar to any professional consultant, SEMASS personnel associated with the Program track their labor time and allocate it to the appropriate tasks or subtasks. Internal labor costs associated with the MSP Program Coordinator (a full-time employee) are directly factored into the MSP6 budget but include the appropriate multipliers for overhead & benefits. Internal labor costs for other personnel who support the program on a part-time basis are allocated using comparable consultant rates commensurate with

their experience and job description. SEMASS uses labor rates comparable to those used by our facility consultants.

The budget estimates above do not include costs associated with office space costs, rental or overhead nor do they include any internal labor that is not directly required on the program. For example, the costs associated with Accounts Payable staff, Procurement Department Staff, Human Resources personnel, Corporate Management, etc. are not allocated to the program. The costs for these services, again similar to a professional consultant, are considering “included” with the equivalent consultant rates used when allocating internal labor to the program.

APPENDIX A

LIST OF SEMASS CONTRACT COMMUNITIES

**Table A-1. List of SEMASS Contract Communities as of
September 2012**

No.	Community
1	Acushnet
2	Avon
3	Barnstable
4	Berkley
5	Braintree
6	Brewster
7	Canton
8	Carver
9	Chatham
10	Cohasset
11	Dennis
12	Dighton
13	Duxbury
14	East Bridgewater
15	Eastham
16	Fairhaven
17	Falmouth
18	Freetown
19	Halifax
20	Hanson
21	Harwich
22	Hingham
23	Kingston
24	Lakeville
25	Marion
26	Martha's Vineyard
27	Mashpee
28	Mattapoisett
29	Middleborough
30	Norwell
31	Orleans
32	Otis Air Nat'l Guard Base/ Massachusetts Military Reservation.
33	Pembroke
34	Plymouth
35	Plympton
36	Provincetown
37	Quincy
38	Rochester
39	Rockland

**Table A-1. List of SEMASS Contract Communities as of
September 2012**

No.	Community
40	Sandwich
41	Scituate
42	Sharon
43	Stoughton
44	Truro
45	Waltham
46	Wareham
47	Wellfleet
48	West Bridgewater
49	Weymouth
50	Whitman
51	Wrentham
52	Yarmouth

APPENDIX B
MSP6 STAKEHOLDER INPUT SUMMARY
JULY - SEPTEMBER 2012

Covanta SEMASS:
Material Separation Plan (MSP) Program for the Diversion of Mercury

STAKEHOLDER MEETINGS SUMMARY (MSP6)

Notices and Meetings. During March 2012, Covanta SEMASS and the other EFW facilities that implement the MSP program met with MassDEP personnel to discuss the MSP program and efforts beyond MSP5. On June 20, 2012, MassDEP notified Covanta SEMASS (SEMASS) and other MSP program facilities to commence preparation of a new MSP “6” plan that would cover the 5-year period of January 2013 through December 2017. Informal discussion with Municipal Representatives and MSP Stakeholders began during July and continued through August 2012. SEMASS sponsored two (2) formal meetings with MSP Stakeholders during September 2012 to discuss the MSP Program and the new MSP “6” plan. Notice of the meetings was sent out to persons on the MSP program contact list on August 31, 2012 via regular mail (one-hundred ten contacts). This was also distributed via electronic mail to those same persons who also had listed e-mail addresses. A copy of this Notice is provided in this Appendix.

MSP Stakeholder meetings were held at the offices of Covanta SEMASS, Rochester, MA as a central location within the MSP program area. These meetings were also offered via conference call to promote wider attendance for those who could not travel to Rochester. Some attendees participated via conference call. Meetings were held on these dates:

- Wednesday, September 12, 2012
- Monday, September 24, 2012

Attendees. A total of seventeen (17) people attended the stakeholder meetings from sixteen (16) municipalities and recycling organizations. Attendance Sheets are included with this Appendix. Representatives from the major recycling organizations also attended including: the Cape Cod Cooperative Extension (CCCE), the South Shore Recycling Cooperative (SSRC), and the MassDEP Municipal Assistance Coordinators (MACs) for Southeast Districts 2 and 3. These recycling organizations represent forty-eight (48) of the fifty-two (52) SEMASS contract communities.

Meeting Discussion and Feedback. SEMASS presented a summary of MSP program results from the 2005 through 2011 timeframe via a MS-Powerpoint presentation and a complete “Stakeholder Draft” of the MSP6 Plan. These were also e-mailed to attendees who participated via conference call. In general, attendees found the MSP Program summary information helpful and had few comments or changes to the suggested MSP6 tasks and program efforts. Other key discussion points are below:

- Historical program data from 2005 – 2011 was presented in the Powerpoint presentation which attendees found helpful and interesting. Overall, SEMASS has observed an average 60% decrease in mercury-content of the inbound solid waste (MSW) based on stack testing that is conducted every 9 months at the SEMASS RRF.

- A minor typographic error on diverted UV/tanning bed bulbs was noted and corrected. The corrected Powerpoint is included in this Appendix.
 - The quantities of liquid elemental mercury found and recycled each year has decreased; SEMASS hopes that we are “squeezing out” the last remaining mercury sources in the MSP program area as a result of program efforts.
- Media outreach will be handled by MassRecycle during MSP6 to provide a more local presence than the Energy Recovery Council (ERC). This results in net savings that have been used to add a new “Social Media” outreach to target a wider range of persons, especially those who primarily receive their daily information through these new media (FaceBook, Twitter, etc.). Traditional radio and Cable TV advertisements will continue in MSP6.
 - The “*Keep Mercury from Rising*” website will be maintained with ERC on lead in conjunction with the other MA EfW facilities contributing to it as well.
 - The new mercury rebate payment program in MSP6 seems to be an attractive program for municipalities and recycling organizations. This program was explained during each meeting. There was some debate whether it should also be applied to straight-tube fluorescent bulbs as well but after further discussion it was concluded that this would probably not increase diverted quantities of straight bulbs.
 - It was clarified that the mercury bonus payment program would be above and beyond the costs for reclamation, transport, and recycling of the devices’ for Level 1 (aka “Tier 1”) Municipalities.
 - SEMASS had previously used the terms of “Tier 1”, “Tier 2”, and “Tier 3” during MSP5 to describe qualifying towns and organizations for the MSP Program. The term “Tier” unfortunately is also used in many SEMASS waste disposal contracts with Municipalities which was causing some confusion. As a result, the MSP6 Plan will now substitute the term “Level” in its place (“Level 1 Community”, “Level 2 Community”, etc) which will mean the same thing as the prior “Tier” community term.
 - SEMASS reorganized the MSP Plan tasks and discussed the rationale:
 - Task 1.0 continues to be the general media outreach task. These include: radio, Cable TV, Social Media, and the internet (Keep Mercury from Rising website).
 - Task 2.0 is now the mercury awareness training and will be conducted by MassRecycle (as part of regional conferences) as well as SEMASS on a individual town basis. It is hoped that this will increase participation.
 - Task 3.0 is now the one-stop shopping location for any municipal program needs including flyers and outreach booklets, the mercury device rebate program, mercury products pickup and recycling and universal waste shed placement.
 - Task 4.0 is targeted efforts via CET and our contractors for specific mercury products such as thermostats and tanning bed bulbs, plus any last remaining sources of liquid elemental mercury.
 - Task 5.0 remains unchanged (program administration) from MSP5.

- SEMASS emphasized the need for Towns, Recyclers, and MSP Stakeholders to quickly notify MSP Program personnel of any sources of liquid elemental mercury that are discovered. SEMASS will send our mercury reclamation contractor directly to the specific location of the mercury source (residence, school, business, town building) to minimize handling and reduce the potential for spills. Costs for the mercury reclamation contractor would be paid by SEMASS as part of MSP Program efforts. SEMASS noted, however, that due to the liability of mercury spills, spill clean-up costs would not be covered under MSP6 program. These costs would be the responsibility of the generator.
 - Modest MSP funding alignments will occur in MSP6 due to the decline of the number of SEMASS contract communities. The number of SEMASS contract communities has declined from a high of sixty-four (64) in 2005 to the current number of fifty-two (52) in 2012. A number of municipalities are seeking waste disposal via other facilities (primarily landfills) instead of disposal via the SEMASS RRF.
 - SEMASS is seeking to set-up a Website or electronic bulletin board through the Covanta Energy Information Systems (IS) Department as an improved means of distributing program information to MSP Stakeholders such as the MSP6 Plan, annual MSP reports, program updates, newsletter updates, contact information, etc.
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Attached Outreach Materials:

- Meetings Notice of August 31st, 2012
- MS-Powerpoint presentation; MSP “6” Stakeholder Meetings – September 2012