Material Separation Plan for the Diversion of Mercury

(MSP5)

January 1, 2010 – December 31, 2012

Wheelabrator Saugus J.V.
Saugus, MA.

August 2009

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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 completed on June 30, 2004, MSP3 was implemented on July 1, 2004 and was completed on December 31, 2006. MSP4 was implemented on January 1 2007 and was completed on December 31, 2008. MSP4 was subsequently extended through calendar year 2009 and was completed on December 31, 2009. Current plan will commence on January 1, 2010 and will be completed on December 31, 2012.

Facility Description

The Wheelabrator Saugus 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 100 Salem Turnpike, Saugus, MA.

Goal of the Plan

The overall goal of this Material Separation Plan (MSP) for the Wheelabrator Saugus 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 Saugus facility. To accomplish this goal, Wheelabrator Saugus 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 Saugus also will provide resources for those that wish to properly dispose of and recycle their mercury-containing products.

Plan Development Process

The development of MSP5 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 June of 2009.

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 Saugus service area.

Service Areas

The Wheelabrator Saugus facility serves sixteen communities (see Table 1) Sixteen communities are under contract or are participating in the program under the expanded program provisions. 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**

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ii) **Regional Outreach**

(1) **General Discussion**

Wheelabrator Saugus 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 Energy Recovery Council (ERC).

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.

(2) **Regional Outreach Programs**

The following proposal summarizes activities to be completed by the Energy Recovery Council (ERC) for its member facilities in Massachusetts. Each activity listed below will be implemented between January, 2010, through December, 2012.
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 reached.

As requested by the Massachusetts Department of Environmental Protection and consistent with the previous MSP, 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**

ERC's (formerly the Integrated Waste Services Association) 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" has been continuously in effect through the present day and although it has evolved to increase its effectiveness with its targeted audience.

Each year, ERC conducts polling (field research), which gives important feedback with which the campaign can be modified to ensure that maximum penetration is achieved with the allocated resources. The 2009 ERC survey spoke volumes about the freefalling Massachusetts economy and its corresponding effect on the environmental attitudes and choices of its residents. Although education remained the most important issue, money-related issues like the state budget and unemployment surged from relative obscurity last year to a higher level of importance while social issues like the environment and crime dropped off. Unlike last year, respondents also hit an "affordability limit" for the price at which they would be willing to pay for non-mercury thermostat equivalents.

Unfortunately, consumers preoccupied with household economic struggles coupled with a growing sense that mercury is more of a threat to the environment than one's health has resulted in higher quick-fix solutions to mercury disposal like throwing a broken item containing mercury into the trash. Despite the plight of the stretched consumer, low-cost solutions like higher recycling participation, fish advisory awareness, and willingness to separate/drive mercury items to a collection center all improved over last year. However, the research directs us to reach out to the growing number of people who are less concerned about the threat of mercury to one's family's health.

ERC proposes to maintain and enhance, as necessary, the "Keep Mercury from Rising" campaign. MSP5 will utilize the new print and media materials developed during MSP4 with input from polling data, state officials, local community officials, plant officials and the general public. The MSP5 will build upon the prior program's work by continuing to use targeted advertising to reach communities serviced by waste-to-energy facilities. MSP5 will focus on broadening the outreach of the

message using new media, including radio, television, and possibly web-based advertising. The objectives for MSP5 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;
- Broadly communicate a message which can leverage opportunities for incremental, free media, and works synergistically with the efforts of individual waste-to-energy facilities.

(ii) **Tactics**

ERC 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 facilities through their trade association also propose to expand web capabilities to provide additional tools for residents in target communities to participate in recycling of mercury-containing products. ERC 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. Annual surveys will be 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 surveys will include 400 completed interviews with Massachusetts residents. Each interview timed out at approximately twelve minutes. There is a 95% confidence level that the margin of error is within +/- 5% given the universe of respondents.

Cost: $20,000 per year

(3) **Details of Activities**

(i) **Advertising:**
Radio and cable television 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. Cable television has also proven to be an effective and affordable means to communicate to large numbers of people. By targeting advertising on cable television stations most likely to be watched by our target

demographics, we can leverage our resources even further. 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 each year during MSP5. In addition, a slate of television advertisements will be run twice per year (along the same schedule as radio advertising) during each year of the MSP5.

Activity: Radio and TV: ERC proposes to implement a two-week radio buy in May and September of each year with cable television advertising running concurrently. The buys 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.

- 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: Radio Buys: $95,000 each year
TV Buys: $50,000 each year

(ii) **Web-based Tools**

This internet-based community information resource is available at www.keepmercuryfromrising.org. The website has been 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. ERC will ensure the material is fresh and easy to download, and provides data on which we can target informational resrouces.

Timeline: January 2010 and ongoing.

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

Cost: $5,000 per year

(iii) **Print Materials**

After development of a new campaign theme and layout for print materials, two types of posters have been developed and introduced with great success. The posters can be individualized by users to convey important event information. In addition, graphically-oriented flyers (pamphlets) provide educational messages in an eye-catching manner. ERC will continue to revise and improve the print materials, as necessary, and will continue to make the print materials available.

Timeline: Printing as needed continuous

Activity: Support facilities as needed with additional print materials.
Cost: Printing: $15,000 per year

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 Saugus 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.

Year	**2010**	**2011**	**2012**
• 5 newspaper ads per yr. / community	$20,625		
5 newspaper ads per yr. / community		$21,375	
4 newspaper ads per yr. / community			$17,700
• 10 HHW / Special ads per year	$ 2,750	$ 2,850	$ 2,950
• Replacement of Educational Boards	$ 650	$ 650	$ 650
Total	**$24,025**	**$24,875**	**$21,300**

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 MSP5 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. Complete Recycling Solutions Inc. (CRS) 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.

	2010	**2011**	**2012**
Budget Estimate:	**$10,000**	**$10,000**	**$10,000**

(iii) **Thermometer Exchange Program**

An important component of the overall program has been the Thermometer Exchange Program. Although the number of thermometers have leveled off during the MSP4 time frame, there continues to be a steady stream of residents that exchange mercury fever thermometers each year. This program will be continued throughout MSP5. 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.

	2010	**2011**	**2012**
Budget Estimate:	**$3,000**	**$3,000**	**$3.000**

(iv) **Thermostat Program**

As part MSP3 and MSP4 an aggressive program for the recovery of thermostats was adopted, primarily focusing on contractors. In cooperation with the local boards of health, regulations were passed by the majority of participating communities. These regulations ban the improper disposal of thermostats and assigned a financial penalty for violations. With the passage of the Mercury Recovery Act by the state of Massachusetts it is no longer necessary for local communities to adopt local regulations. Those communities that have adopted regulations will keep them on the books because they do provide a penalty for violations.

A postcard mailing will be conducted to plumbing contractors with information for contractors informing them of the passage of the Mercury Recovery Act. The postcard will be mailed to the address of licensure for each contractor informing them where they can safely dispose of thermostats and other mercury containing devices.

	2010	**2011**	**2012**
Budget Estimate:	**$4,000**	**$4,500**	**$5,000**

(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.

	2010	2011	2012
Budget Estimate (Rebate):	**$7,000**	**$7,000**	**$6,740**
Plumbing Supply Collection Costs:	**$3,000**	**$3,000**	**$3,000**

(vi) **School Clean Sweeps**

The School Clean Sweeps Program was initiated in MSP1. MSP2, MSP3 and MSP4 saw a continuation of the program. All of the 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 that particular school system are notified by an administrator of the school system of the impending program. 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.

MSP5 will continue offering the School Clean Sweeps Program to school systems within the service area. On several occasions, schools that have conducted what was considered 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.

	2010	2011	2012
Budget Estimate:	**$1,000**	**$1,000**	**$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.

Communities are 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 ideal organization is one that is well known in the community and performs works that benefits the community such as a Garden Club, Friends of the Library , Friends of the Senior Center etc. It is also important that the group be able to sustain the

program over multiple years. 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 have been designed, printed and will be provided to each group to help advertise the program and identifying the program as a fund-raiser for the local group. These flyers are usefull for advertising in store windows and on or near the counter where the collection box is located.

	2010	**2011**	**2012**
Budget Estimate:	**$5,000**	**$5,500**	**$5,500**

(viii) **Miscellaneous (Bulk) Mercury Collection Program**

The Bulk Mercury Collection Program was implemented in MSP2. When needed this program has been very beneficial. Large quantities of elemental mercury have been found in basements, garages and the largest quantity was found in a wooden barrel in a resident's backyard. In these instances the program manager first inspects the elemental mercury, its' location and the container that it is in. The service provider is then contacted, given the specific information and then goes to that location to pick up the mercury.

The Bulk Mercury Collection Program will be continued in MSP5.

	2010	**2011**	**2012**
Budget Estimate:	**$1,000**	**$1,365**	**$500**

(ix) **Fluorescent Lamp Reimbursement Program**

The Fluorescent Lamp Reimbursement Program reimburses communities the full cost of recycling fluorescent lamps up to the amount listed in the Massachusetts Procurement Contract which at present is currently .06 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. Some communities also offer residents and small businesses the opportunity to recycle their fluorescent lamps. This 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.

During MSP4 a concerted effort was made to incorporate local hardware stores in participating in the program in partnership with their local community. Currently there are fifty-five hardware stores participating in the program. Local hardware stores provide a convenient drop-off locations for residents interested in properly disposing of their fluorescent lamps. These partnerships have been extremely successful resulting in thousands of fluorescent lamps, primarily compact fluorescents being diverted from the municipal waste stream.

The Fluorescent Lamp Reimbursement Program will continue in MSP5.

	2010	**2011**	**2012**
Budget Estimate:	**$22,515**	**$24,000**	**$25,000**

(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. Throughout MSP4 the Mercury Recovery Program has provided communities with Universal Waste Sheds. These sheds have proven to be invaluable in helping to establish community collection programs for fluorescent lamps. Each year new communities contract with the plant and often require a shed to help get a collection program off the ground.

The sheds are delivered and erected on an appropriate site selected by the community. Each shed has a sign identifying it as a Universal Waste Shed and lists the products considered as Universal Waste.

Universal Waste Sheds will continue to be offered to communities in MSP5

	2010	**2011**	**2012**
Budget Estimate	$7,200	$2,500	$5,200

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Universal Waste Sheds will continue to be offered to communities in MSP5

	2010	**2011**	**2012**
Budget Estimate	**$7,200**	**$2,500**	**$5,200**

(XI) **Expanded Service Area**

During MSP4 the service area for the Mercury Recovery Program was expanded to include communities that were not contracted directly with the plant but trash was coming to the plant through private haulers. The Mercury Recovery Program was offered to selected communities if certain criteria were 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 and or the community 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, and if needed, a modification to MSP5 will be submitted at that time. This aspect of the program has been very successful resulting is several new communities being provided with the services of the program.

Program Administration

The Mercury Material Separation Program will be managed by the Wheelabrator Saugus facility. Wheelabrator Saugus 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 Energy Recovery Council (ERC). ERC 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.

Complete Recycling Solutions (CRS), 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 CRS 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 Saugus Inc.
Community Population:

Beverly	40,000
Chelsea	35,080
Everett	38,500
Gloucester	30,308
Ipswich	12,987
Lynn	89,050
Malden	56,000
Marblehead	20,377
Medford	55,765
Milton	26,062
Norwood	28,587
Revere	43,766
Rockport	7,300
Saugus	25,553
Swampscott	14,412
Woburn	37,258
TOTAL:	**561,005**

Source: U.S. Census, 2000
MSP5 Estimated Budget for 3 years
Number of Contract Communities Served - 16
Three year average, processed tons – 410,080
Budget Estimates for 2010, 2011 and 2012 will change depending on total tonnage processed in each successive years. See attached Budget Estimates.