Recycling Enforcement Initiative (REI)

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Sustainable Materials Management Planning & Implementation

Connecticut Department of Energy and Environmental Protection
WEED inspected approximately 100 facilities

Sectors Evaluated

- Multi-Tenant Housing: 55%
- Hotels: 10%
- Retail: 15%
- Industrial/Manufacturing: 5%
- Grocery Stores: 5%
- Other (pharm., rest.): 10%
70% of Sites inspected had Designated Recycling Violations

Recycling Violations Observed

- Multi-Tenant: Sites Inspected (purple) and Sites w/Recycling Violations (teal)
- Retail: Sites Inspected (purple)
- Industrial/Manufacturing: Sites Inspected (purple) and Sites w/Recycling Violations (teal)
- Hotels: Sites Inspected (purple) and Sites w/Recycling Violations (teal)
- Grocery Stores: Sites Inspected (purple) and Sites w/Recycling Violations (teal)
Typical Violations Identified

1. **Limited Recycling:**
   a) Site recycled only one or a few designated recyclable items
      - For example, some Retail or Manufacturing facilities recycled cardboard or scrap metal only
      - No recycling provided for other items, such as, bottles, cans, newspapers, magazines or office paper

2. **Mixing of recyclable items:**
   a) Site may have had a recycling program in place, but more than an incidental amount of designated recyclable material was combined with trash
   b) Several multi-tenant sites had a significant recycling program in place, however, maintenance workers had been removing redeemable cans/bottles and then discarding the remaining designated recyclables into the trash
3. No Recycling Program at all:

- MSW Contracts do not include the collection of designated recyclable items
- No internal collection containers associated with recycling
- No external collection containers associated with recycling
- No facility staff designated or responsible for recycling
- For the multi-tenant housing sector: No outreach/education provided to tenants
REI Actions to Date

- **NONs issued to 2 Sites**
  - Identifies violations
  - Provides formal notice to facilities of recycling requirements
  - Does not require a formal response

- **NOVs issued to over 40 Multi-Tenant Housing Sites (Hartford & New Haven)**
  - Early in the process, but a few have responded well thus far by implementing Recycling Programs
    - Installed collection containers (internally & externally)
    - Expanded collection contracts with Solid Waste Haulers to include collection of recyclables
  - Provided outreach/education to tenants
  - Developed and implemented SOPs to ensure recyclables remain segregated

Those that fail to adequately respond will be assessed to determine the need for an escalated action, consistent with the ERP, which may include civil penalty.
REI Actions to Date

- **Compliance Assistance has been provided to Multiple Sites**
  - Most have been closed out, but a few have not responded adequately and will be discussed to determine the next course action (ERP):
    - Close out
    - Gather more field data
    - Utilize traditional Enforcement Response
• http://www.ct.gov/deep/recyclinglaws
• http://www.ct.gov/deep/recycle
• www.ct.gov/deep/cmms

• (860) 424 – 3366