

An Approach for the Management of Gas Cylinders

May 3, 2022





Agenda

1. Background on Work in Connecticut
2. Guiding Principles
3. Program Plan
4. Key Elements of Legislation
5. Questions

Worthington Industries

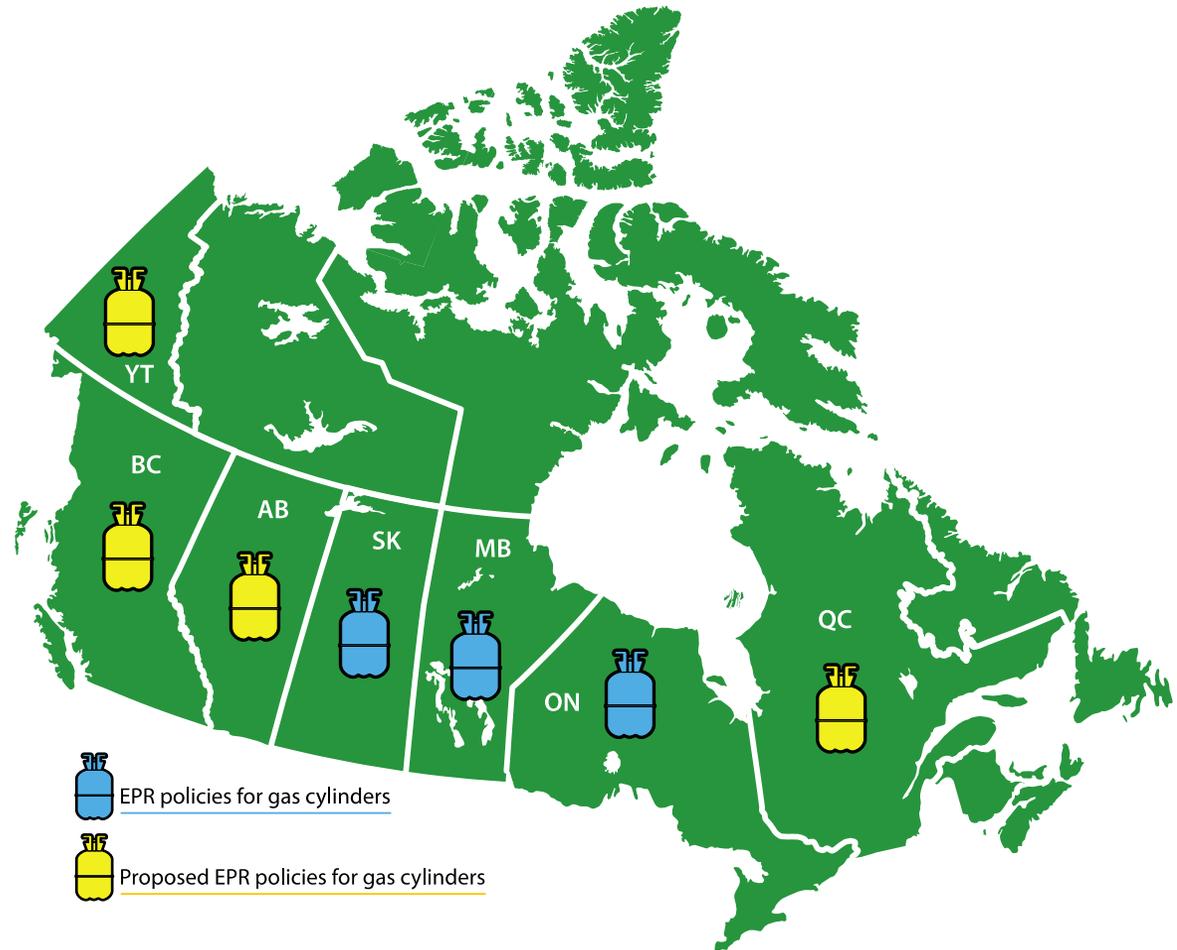
- Worthington Industries is a leading global supplier of pressurized cylinders and accessories for applications such as fuel storage, water systems, outdoor living, tools and celebrations; and North America's premier value-added steel processor
- As a leading US-based cylinder manufacturer, Worthington Industries committed to work with the state of Connecticut to support the effective management of discarded residential pressurized cylinders



Background on Work in Connecticut

- Worthington committed to meeting the objectives set by Connecticut legislators to:
 - Minimize public sector involvement in the management of discarded residential pressurized cylinders;
 - Free, convenient and accessible state-wide collection of discarded residential pressurized cylinders from residents;
 - Continuous, meaningful improvement in the collection of discarded residential pressurized cylinders over time;
 - Safe handling of discarded pressurized cylinders;
 - Reuse of residual gases; and
 - Recycling of discarded pressurized cylinders.
- Convened a team with experience in developing, implementing and overseeing producer responsibility policies in Canada, including the gas cylinder EPR system in Ontario
 - Review the legislation
 - Understand current conditions
 - Develop plan & modify legislation

Review of Other Jurisdictions





Guiding Principles

- Ensure a level-playing field (i.e., for producers and similar products)
- Focus on outcomes as opposed to process (i.e., provide the opportunity to innovate)
- Provide for proper oversight and enforcement
- Establish achievable timeline that ensures implementation success

Understanding the Context

- To better understand the current practices for collection and management of discarded residential pressurized cylinders, the following tasks were undertaken in Connecticut:
 - Surveys were sent to municipal governments, regional household hazardous waste (HHW) coordinators, and municipal transfer facility operators
 - Interviews were conducted with major retailers, propane gas distributors, waste management service providers, colleges and private campgrounds
 - Information was gathered from the Department of Energy and Environmental Protection (DEEP) related to pressurized cylinder management in state parks, municipalities, and other sites

Program Plan

- **Plan Outline:** Worthington will be responsible to pick up, transport and properly manage pressurized cylinders that Worthington Industries supplies to its residential consumers in Connecticut
 - Worthington will arrange to pick up cylinders from Connecticut HHW events, drop-offs, transfer stations and disposal & recycling facilities
 - Worthington will arrange to pick up cylinders in Connecticut state parks and campgrounds
 - Worthington will create a pilot retail take back program in Connecticut
- **Consumer Education and Communication:** A marketing awareness campaign will be created to educate consumers on the proper end-of-life management of pressurized cylinders and available collection locations



Program Plan

- **In-Scope:** residential gas cylinders (0.5 lbs to 50 lbs) that contain helium, carbon dioxide or flammable materials
- **Out-of-Scope:** Pressurized cylinders supplied to industrial, commercial and institutional consumers; pressurized cylinders containing oxygen, refrigerants, acetylene, hydrogen, ethylene and foam adhesives; fire extinguishers.
- **Performance Goals:** Initial target for non-refillable cylinders set; to be reassessed after 1st year
- **Annual Reporting:** # of collection sites by type, # of cylinders collected, tons recycled
- **Tracking of Outcomes**

Types of Pressurized Cylinders	DOT Product Specifications	Management Considerations
Non-Refillable Cylinders		
16 oz Propane	39	Does not need to be stored upright as DOT 39 cylinder <1.2L in volume
14 oz Fuel Torch	39	Does not need to be stored upright as DOT 39 cylinder <1.2L in volume
Helium, 9.5" (29.7 lb) Helium, 12" (49.6 lb)	39	Does not need to be stored upright as not flammable
4 oz / 8 oz / 16 oz Isobutane camping cylinders		Does not need to be stored upright as pressure valve not required
5.5 oz Butane		Does not need to be stored upright as pressure valve not required
Refillable Cylinders		
20 lb and under Propane	4BA	Must be stored upright

Connecticut Legislation

- Worked closely with Connecticut legislators based on guiding principles and the development of the plan
- Worthington supported the legislation
- Passed the Environment Committee and the House with all party support
- Awaiting vote in the Senate



House of Representatives

File No. 510

General Assembly

February Session, 2022

(Reprint of File No. 58)

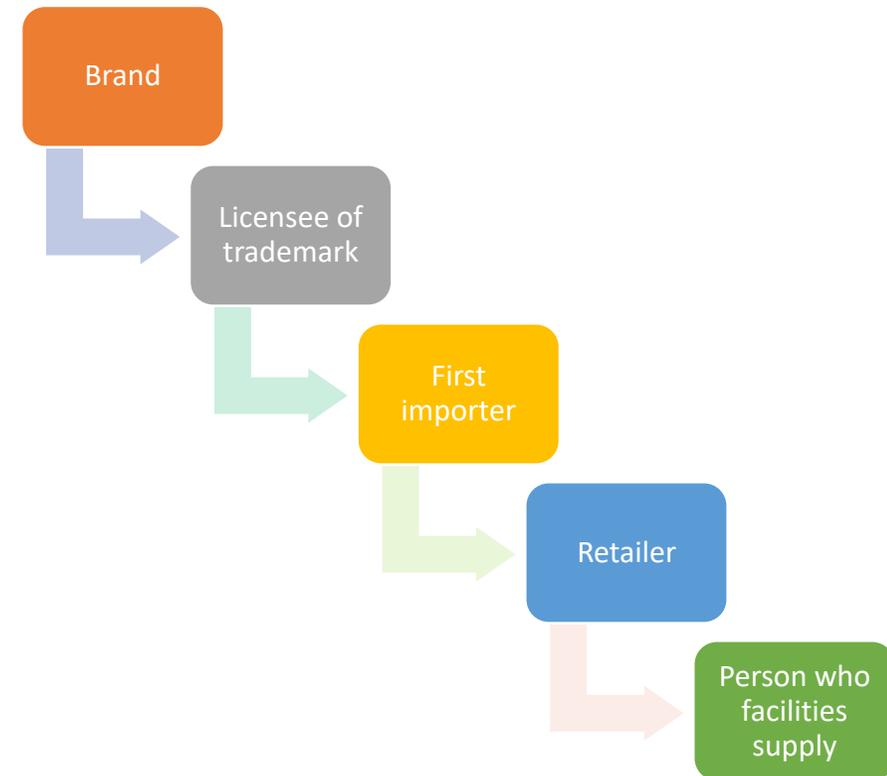
Substitute House Bill No. 5142
As Amended by House Amendment
Schedule "A"

Approved by the Legislative Commissioner
April 18, 2022

**AN ACT CONCERNING EXTENDED PRODUCER RESPONSIBILITY
FOR CERTAIN GAS CYLINDERS.**

Key Elements of Legislation

- Definition of Producer (instead of manufacturer)
 - Hierarchy approach that ensures clarity and reduces potential for conflict
 - Addresses out-of-state suppliers and e-commerce
 - Allows for voluntary producers
- Definition of Supplied
 - Broadens 'sale' or 'sell' to capture all types of transactions by which products may be supplied to consumers
 - Follows jurisdictional best practice (i.e., Canadian jurisdictions that have a number of years' experience)
- Provides flexibility in meeting outcomes
 - Allows for multiple plans (e.g., allows for innovation in approach which may vary based on cylinder type)
 - Focus on outcomes not process (e.g., not dictating how, when and where cylinders are collected – prescriptive requirements can dis-incent the most efficient and effective system)
- No fiscal requirements
 - Does not dictate how the program is funded (e.g., a consumer fee at retail), allowing producers to treat financial costs of the program as a cost of doing business



Key Elements of Legislation

- Designated Materials
 - Focus on residential cylinders – captures what residents are dropping off
 - Does not include more controversial cylinders (e.g., non-residential, fire extinguishers)
 - Focuses efforts on gas cylinders so that producers of gas cylinders can manage their products and their program
- Oversight & Enforcement
 - Funding mechanism for oversight body to ensure it is resourced
 - Requires reporting by oversight body to monitor that funds are properly used
 - Enforcement mechanism available (e.g., ability to ban supply); also proposed administrative penalties
- Timeline
 - Provides adequate time to review stewardship plans and incorporate potential revisions
 - Level playing field as all plans start at same time
 - Provides adequate time for implementation after the plan approval process (e.g., time for producers and vendors to establish contractual relationships)
 - Avoids winter start date which could present consumer buy-in challenges

Thank You & Questions

Annie Lane
Director of Product Sustainability
Consumer Products Business, Worthington Industries
annie.lane@worthingtonindustries.com
614-840-4012

Peter Hargreave
Policy Integrity Inc.
phargreave@policyintegrity.ca
905-741-2171