

July 20, 2022

Terri L. Goldberg
Executive Director

U. S. Environmental Protection Agency
<http://www.regulations.gov/>

89 South Street
Suite 600
Boston, MA 02111

Subject: The Solid Waste Infrastructure for Recycling grant program ([OLEM-2022-0342](#)) and the Recycling Education and Outreach grant program and Model Recycling Program Toolkit ([OLEM-2022-0375](#))

Tel 617 367-8558
TDD/TTY 857-265-3934
www.newmoa.org

Dear Sir or Madam:

The Northeast Waste Management Officials' Association (NEWMOA) appreciates the opportunity to comment on EPA's "Solid Waste Infrastructure for Recycling Grant Program and Recycling Education and Outreach Grant Program and Model Recycling Program Toolkit" as published in the June 9, 2022 *Federal Register*. We applaud EPA for seeking stakeholder input and information on these grant programs and appreciate your willingness to consider our suggestions. The comments outlined below represent the views of NEWMOA's members. We hope that our recommendations will help to improve and clarify EPA's approach to awarding these critical and unprecedented grants.

NEWMOA's members believe this funding, if properly utilized, can significantly advance the development of the solid waste and recycling infrastructure in the northeast region and the U.S. We offer the following comments relative to the development and implementation of the grant program.

Historically, states have taken the lead in the management of solid waste and recycling within their respective jurisdictions, developing strategic plans, promulgating regulations, permitting facilities, providing technical and financial assistance, conducting general outreach and education, and coordinating with other states. NEWMOA believes this knowledge and experience is critical to ensuring that Bipartisan Infrastructure Legislation (BIL) funding is allocated effectively. For this reason, we strongly recommend that the majority of BIL funding be allocated to state agencies responsible for solid waste and recycling to invest collaboratively with our partners (i.e., municipalities, non-profits, and businesses) and in support of state and regional needs.

To maximize BIL investments, NEWMOA recommends that the funds focus on expanding the recycling infrastructure. If the waste reduction goals of EPA and NEWMOA's members are to be achieved, the focus needs to be on both the infrastructure that directly supports our collective recycling objectives, and on enhancing criteria for new end-user markets. Additionally, since our members are significantly increasing their focus on waste reduction, reuse, organics diversion, and toxics reduction

efforts, we recommend that these concepts be included as eligible investments. Waste reduction, reuse, recycling, organics diversion, and toxics reduction – including household hazardous waste diversion – initiatives are critically important if we are to achieve our climate goals, reduce solid waste being shipped for disposal, and maximize the benefits of recycling on jobs, the environment, and the economy.

To ensure the sustainability and longevity of the BIL investment, NEWMOA recommends that funds be directed to capital investment over operating expenses. Although many municipalities and states have ongoing operating expense challenges, we feel the limited amount and duration of funding would be better used to improve the efficiency and effectiveness of the reduction, organics diversion, reuse, and recycling infrastructure. If invested correctly, a stronger more efficient infrastructure will translate to savings in operational expenses. As part of the needed recycling infrastructure that is eligible for funding, we urge EPA to allow states to use BIL funding to support state planning and digital infrastructure for data management. Long-term planning (by states, solid waste management entities, etc.) is crucial to shaping waste reduction, recycling, and reuse programs and inform where future capital investments may be needed. A modern digital infrastructure is key to effective communications and coordination.

NEWMOA is a non-profit, non-partisan interstate association that was established by the governors of the New England states as an official interstate regional organization, in accordance with Section 1005 of the federal Resource Conservation and Recovery Act (RCRA), to coordinate interstate hazardous and solid waste activities. The organization was formally recognized by the U.S. EPA in 1986. NEWMOA membership is composed of the state environment agency programs that address pollution prevention, toxics use reduction, sustainability, materials management, hazardous waste, solid waste, emergency response, waste site cleanup, underground storage tanks, and related environmental challenges in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. NEWMOA provides a strategic forum for effectively solving environmental problems through collaborative regional initiatives that advance pollution prevention and sustainability, promote safer alternatives to toxic materials in products, identify and assess emerging contaminants, facilitate adaptation to climate change, mitigate greenhouse gas sources, promote reuse and recycling of wastes and diversion of organics, support proper management of hazardous and solid wastes, and facilitate clean-up of contaminant releases to the environment. For more information on NEWMOA, visit www.newmoa.org.

NEWMOA appreciates your consideration of the concerns and suggestions outlined in this letter. Terri Goldberg, NEWMOA's Executive Director, will be happy to discuss these comments. She can be reached by email (tgoldberg@newmoa.org) or by telephone (617-367-8558 x302).

Sincerely,



Michael J. Wimsatt, New Hampshire Department of Environmental Services
NEWMOA's 2022 Chair