

The Vermont Household Hazardous Waste (HHW) Extended Producer Responsibility (EPR) Law ([Act 58 of 2023](#)) requires manufacturers of “covered household hazardous products” to provide free statewide collection of covered household hazardous products.

Frequently Asked Questions

Produced by the Vermont Agency of Natural Resources (ANR), Department of Environmental Conservation, Solid Waste Management Program, 802-828-1138, www.VTrecycles.com.

1. Q: What is a covered household hazardous product?

A: A “covered household hazardous product” means a consumer product offered for retail sale in Vermont that is contained in its original receptacle. A product is covered if the product, or a component of it, is defined as hazardous waste under [Vermont Hazardous Waste Management Regulations \(subchapter 2\)](#) regardless of the generator. Covered products also includes certain gas cylinders (see Question 2 below for details).

Covered products do not include: a primary or rechargeable battery; a lamp that contains mercury; a thermostat that contains mercury; architectural paint; a covered electronic device; a pharmaceutical drug; citronella candles; flea and tick collars; and any [pesticide required to be registered](#) with the VT Agency of Agriculture, Food and Markets; or products that are intended to be rubbed, poured, sprinkled on, sprayed on, introduced into, or otherwise applied to the human body or any part of a human for cleansing, moisturizing, sun protection, beautifying, promoting attractiveness, or altering appearance, unless designated as a hazardous material or a hazardous waste by the Secretary of Natural Resources.

2. Q: What types of gas cylinders are “covered” and included in this EPR law?

A: All nonrefillable cylinders sold to a consumer for personal or household use with a water capacity not exceeding 50lbs including:

- single use and rechargeable handheld fire extinguishers up to 50 pounds water capacity,
- spray foam insulating products up to 50 pounds water capacity,
- non refillable helium cylinders up to 50 pounds water capacity, and
- cylinders containing flammable pressurized gas, helium or carbon dioxide up to 50 pounds water capacity.

Note that refillable propane cylinders not exceeding a water capacity of one pound are also covered.

Note that medical or industrial-grade cylinders are not covered.

3. Q: When will the HHW EPR Program begin?

A: [Refer to the VT HHW EPR Timeline linked below for full details] **Collection Plan Implementation:** Stewardship organizations must implement the Collection Plan 6-months after ANR approval (potentially March 1, 2026, assuming plan approval is complete by October 1, 2025).

- **Sale Prohibited of Household Hazardous Products that Don’t Participate (also six months after Plan approval):** Manufacturers cannot sell covered household hazardous products into Vermont unless they are participating in the approved Collection Plan.

4. Q: When are producers required to be registered with the stewardship organization and pay fees?

A: On or before January 1, 2025, a stewardship organization must be formed and must register with ANR. Manufacturers and producers must have the opportunity to participate in the stewardship organization. The

stewardship organization must submit a collection plan by July 1, 2025. Six months after the collection plan is approved, sales are prohibited in Vermont (online retail sales and traditional brick and mortar retail) for products from manufacturers who are not participating.

5. Q: When will the ANR fee come into effect?

A: ANR will submit a recommended annual registration fee to the Legislature no later than January 15, 2024. If approved, this fee would be due from the stewardship organization when it registers on January 1, 2025.

6. Q: When will Solid Waste Management Entities receive reimbursement for HHW collection from the product stewardship organization?

A: The stewardship organization will be responsible for funding program implementation 6-months after ANR approves the Collection Plan. Assuming the program begins approximately March 2026, SWMEs and towns will begin to see reimbursement funding around 2027 for their costs they incurred once the program is being implemented. ANR will help facilitate a conversation between the stewardship organization and SWMEs about program implementation for covered products collected at HHW collection programs.

7. Q: What is an orphan covered product?

A: "Orphan covered product" means a covered household hazardous product for which no manufacturer is participating in a stewardship organization. Examples of orphaned covered products could be a product which is no longer being manufactured and there is no manufacturer to hold responsible to participate in the stewardship organization. However, if the product is not in the receptacle in which the product was offered for retail sale, it would not be considered an "orphan covered product". The Stewardship organizations collection program must provide free statewide collection for all orphan covered products.

- **Q: What orphan waste will the stewardship organization be responsible for?**

A: Any covered product even if the manufacturer of that product is not participating in an ANR approved stewardship organization.

- **Q: How much orphaned waste is there in VT HHW collections?**

A: It is difficult to estimate the number of products that may be collected where the manufacturer is no longer in business. Based upon conversations with Vermont municipal Solid Waste Management Entities, it is likely that this is a relatively small portion of "covered household hazardous products." The amount of orphaned waste can be better determined once manufacturers participate in a stewardship organization that registers with the Agency. The Agency may take enforcement actions including issuing "stop sale" notices on any manufacturers and their products when they are being sold in Vermont without participating in an ANR approved stewardship organization.

8. Is there data or information on municipal sites accepting HHW materials (e.g., addresses) and events (frequency, length, etc.)?

A: There are eight permanent HHW facilities operated by SWMEs in Addison County, Chittenden County, Northeast Kingdom (seasonal), Northwestern Vermont, Windham County, Windsor County (seasonal) Bennington County, and Rutland County, and one more proposed to be established in Washington County in 2024. Two independent towns have HHW facilities that serve only the town's residents on two days per year. The remainder of the State is served by 31 single-day collection events operated by a hazardous waste contractor hired by the SWME.

In addition, ANR will share direct contact information for all municipalities and solid waste management entities (SWME) collecting HHW in VT and arrange a meeting(s) with manufacturers and stewardship organization.

See [SWME map](#) and [Map of HHW facilities](#) for overview but ANR will provide direct contacts.

9. Q: What types of HHW materials are accepted at municipal facilities or events?

A: HHW events and collection facilities accept all covered household hazardous products along with materials from other EPR programs and landfill banned materials that are not covered by any program. Common examples include acids, aerosols, bases, fire extinguishers, flammables, solvents, automotive fluids, propane tanks, pool chemicals, photo chemicals. ANR is creating a Covered Product Category list to share publicly soon.

10. Q: What types of limitations, if any, do municipal sites have on who they accept materials from (e.g., only residential) or on the amounts of HHW they can receive?

A: SWMEs are required by the State's Vermont Materials Management Plan to offer regular collection of HHW and Very Small Quantity Generators hazardous waste (such as schools and small businesses). If SWMEs opt to participate in the Vermont HHW EPR collection program, then they will need to accept all covered products from any Vermont household and Very Small Quantity Generators with no limits for region boundaries. SWMEs with facilities will need to adhere to certification requirements for allowable storage capacity.

11. Q: Is there data on the amount collected annually by HHW type and any information related to seasonality? Or lab pack analysis?

A: Statewide Diversion and Disposal Reports provide an annual collection total and the SWME facilities that are open year-round have more specific details related to seasonality and/or lab packs. The HHW data is on the last pages of the [2021 Diversion and Disposal Report](#). Here's a link to [2021 Diversion and Disposal Report - TABLES and FIGURES ONLY](#) or try this link to the [Archive of Historic D&D Reports](#).

12. Q: Is there data on how municipal costs are broken out including by HHW material type?

A: SWMEs have this specific data from their facility and collection event invoices. It is estimated that the Vermont HHW EPR law will cover less than 20% of the material—by weight—that HHW programs collect.

13. Q: What information is available on how municipalities are currently contracting for services (collection and processing)?

A: SWMEs contract individually with service providers. Currently, there are about 4-5 Hazardous waste vendors who service VT. Contact information for these vendors may be provided and SWMEs can choose to provide pricing details with the stewardship organization if they wish to do so.

14. Q: What does a disposal ban entail?

A: On July 1, 2025, the disposal ban on "covered household hazardous products" goes into effect, which states that "No person shall knowingly dispose of...covered household hazardous products." ANR will conduct outreach to facilities, haulers and the public on the disposal ban and provide information on local collection locations for proper disposal. The addition of this disposal ban gives ANR authority to take enforcement actions for any person that knowingly disposes of "covered household hazardous products."

Additional Resources:

[VT HHW EPR web page](#)
[HHW EPR Timeline](#)
[Resources for determining Pesticide Registration Status](#)
[VT Hazardous Waste Management Regulations](#)
Covered Product Categories List

Solid Waste
Management Program
802-828-1138
www.VTrecycles.com