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March 23, 2021

Via electronic submission

Senator Dominick J. Ruggiero
President of the Rhode Island Senate
82 Smith Street
Providence, RI 02903

Re: Support for S0321

Dear Senator Ruggiero:

On behalf of the Healthcare Waste Institute (HWI) of the National Waste & Recycling Association (NWRA), I am writing to express our support for Senate Bill 0321, an act relating to waters and navigation, state affairs and government, and health and safety. The HWI represents manufacturers and service providers as well as other professionals in the healthcare waste management industry.

This bill fixes a problem that arose within the Rhode Island Department of Environmental Management (DEM) due to findings in the Ken Rocha Collision, LL v. the Rhode Island Department of Environmental Management (Rocha) court case. The results of which prevents the DEM from being able to manage some of their programs, including those under the Resource Conversation & Recovery Act (RCRA).

Our members work with DEM to apply for their permits and to maintain compliance with these regulations. However, if DEM does not have the ability to enforce federal regulations as a delegated state, the authority would instead return to the federal government. This puts our members in an untenable situation with respect to their permits.

HWI appreciates your consideration of our support for this bill. HWI and its members would appreciate the opportunity to discuss these and other concerns in further detail. Should you have any questions, please call Anne Germain at 202-364-3724 or e-mail at agermain@wasterecycling.org.

Very truly yours,

A handwritten signature in black ink that reads "Darrel K. Smith". The signature is written in a cursive style with a large initial 'D' and 'S'.

Darrel K. Smith
President & CEO

c: Sen. Dawn Euer
Sen. Sandra Cano
Sen. Alana DiMario
Sen. Melissa Murray
Sen. Bridget Valverde