



The President's Corner



William Rabbia, President

2016 has been a very active year for NYSASWM, with the wide range of activity from the proposed Part 360 modifications, E-waste regulations, proposed organics legislation and work toward paint stewardship. The NYSASWM Board has been actively working on our member's behalf to get our views heard and protect our interests.

I want to thank all members who have responded to our recent survey monkey related to E-waste expenses. We need your input data, and advice. I encourage all our members to contact myself, Jeff Bouchard or any Board Member, with regulatory concerns or recommendations for NYSASWM action.

Following our extensive work this summer on compiling comments on Part 360, Board members have been active at E-waste regulation stakeholder meetings and meetings concerning paint stewardship. We have also continued our partnership with NYSAC and together

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NYS EPF Grants for Municipal E-Waste Assistance – NEW Application Period!

NYSDEC has announced a second round funding opportunity for **Electronic Waste Assistance Grants (EWAG)**. **Applications will again be accepted during January 2017** from any municipality that did not already apply during the October 2016 application period. The 2016/17 State budget included \$3 million from the Environmental Protection Fund to assist municipalities with recent unexpected costs of recycling electronic waste.

Consistent with the HHW State Assistance Program procedures, EWAG applications will be accepted during **January 2, 2017 – January 31, 2017**. These grants can reimburse up to 50% of actual expenses incurred during April 1, 2016 to March 31, 2017 for recycling of covered e-waste such as computers, computer peripherals, televisions, small scale servers, and small electronic equipment.

FAQs on E-Waste Funding Round 2

Q1. If a community submitted an application in the first round can they submit again in the second round for e-waste cost reimbursements?

A1. The January 2017 round is intended to reach out to communities with eligible e-waste costs, but who may have missed the first round in October 2016. The time period to be covered by both rounds is the same (April 1, 2016 - March 31, 2017).

Q2. Can a community find out its status on any previously submitted grant applications as to whether a previous submission was determined to be eligible... ie can a community get feedback on any first round submission application prior to making a second round application?

A2. Reviews are still ongoing as of today, but DEC expects to provide feedback to most applicants during December. There is more work to be done between DEC and grantees in order to set up a grant contract, and make payments, but the result of the October grant requests will be known before the January round.

Q3. The fact that this grant opportunity solicitation is being re-issued suggests that the first round of applications were below initial expectations for \$\$ requests, is this correct?

A3. That is correct. Reviews are still being conducted of the 84 applications received during October. The total of grant amounts awarded is anticipated to be approximately \$1.2 million, leaving some funding available for a second chance offering in January.

Q4. Have there been any program changes relative to eligibility and application process? I suspect not, but just looking to confirm.

A4. No changes have been made. Only a second chance for anyone who may have been unaware of the first opportunity.

A July 22, 2016 press release about this funding may be viewed at: <https://www.governor.ny.gov/news/governor-cuomo-announces-3-million-electronic-waste-recycling>

For more information, or to download an E-Waste Assistance Grant application, visit the DEC website at <http://www.dec.ny.gov/chemical/107384.html> or call 518-402-8678 or email planning@dec.ny.gov

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NYSASWM Wasteline

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NYSDEC Update

Part 360 Revisions

The public comment period on the draft regulations expired on September 13, 2016. DEC is now busy sorting through the thousands of comments received, developing a responsiveness summary for the comments, and drafting revisions to the proposed regulations. Due to the depth of some of the changes that DEC will be making to the draft regulations, **DEC expects that the regulations will be opened again for public comment early in 2017 with final revisions scheduled for publication in September 2017.** The revisions to the draft regulations will be presented in a format that will make it evident what terms have changed from the earlier draft, for ease of review by the reader. For additional questions, please contact SolidWasteRegulations@dec.ny.gov

NYSASWM Joins Forces in Effort to Include Paint Stewardship in 2017/2018 State Budget

Early in November the New York State Association of Counties (NYSAC), the New York State Association for Solid Waste Management (NYSASWM), the Product Stewardship Institute (PSI), the New York Product Stewardship Council (NYPSC), and the American Coatings Association (ACA), met with Governor Cuomo's office to discuss the inclusion of a paint stewardship program in the Governor's 2017/2018 Executive Budget. Proposed bill language would create an industry-managed "stewardship organization" to set up and run a convenient, statewide system for the collection of post-consumer paint. An environmentally responsible and financially sustainable option for paint management through a paint stewardship program is aimed to promote paint reuse and recycling, establish a network of voluntary retail and municipal paint collection sites, and educate consumers on environmentally responsible paint management.

Details of the proposal include an "eco-fee" where only paint users pay for paint management instead of all taxpayers, directing monies into a dedicated fund managed by the industry for the specific purpose of reducing paint waste and increasing recycling. The program is and would be industry managed, with government oversight, significantly reducing the burden on state and local government officials, who are now solely responsible for managing all **3.9 million gallons each year** of leftover paint generated annually in New York. Over **1,703** paint retailers voluntarily collect paint in states with paint stewardship programs. Such sites reduce the burden on government waste management programs. NYSASWM supports an industry backed program and will monitor progress of advocacy efforts.

Scholarships Available

Christiansen-Roller-White-Miles Founders' Scholarship Program

NYSASWM Members who are or have family members in undergraduate and graduate programs in Environmental/Waste Management or related programs are encouraged to apply for the Christiansen-Roller-White-Miles Founders' Scholarship Program of the New York State Association for Solid Waste Management (NYSASWM). The waste management field is ever changing. Organic waste composting, waste reduction, thermal degradation, electronics recycling, greenhouse gas emission reduction, product stewardship, facility operational improvements...these are just a few of the areas that NYSASWM is involved with to enhance solid waste management practices in New York State. **The NYSASWM Scholarship program is authorized to fund up to five students up to a maximum of \$5000 each per year to assist students in pursuing their Environmental/Waste Management studies.** This is part of NYSASWM's effort to insure availability of well-trained environmental/waste management professionals to lead our programs into the future.

Information on the Scholarship Program is available at the NYSASWM website, nysaswm.org. Click the link for Scholarships for details on the application process. The actual application is completed and submitted on-line through a "Choice Form" but please remember to have the students print a copy of the completed form for their records. **The application deadline is February 29.**

NYSASWM offers this scholarship opportunity for undergraduate or graduate students who present the future leaders in the environmental/waste management field. For answers to questions please contact the Scholarship Committee Chairperson Joseph Stockbridge.

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COLLEAGUE PASSING

Richard D. Morse

Richard Dunn Morse passed away on Monday, November 7, 2016. He was 66. Rick was born on March 21, 1950, to Richard and Rosalie (Scolari) Morse in Heidelberg, Germany. He spent his youth in Rotterdam. Rick graduated from Bishop Gibbons High School and received both his B.A. and M.A. from S.U.N.Y. Albany. After spending 32 years at the New York State Assembly, where he was one of the original authors of Superfund legislation, Rick worked as a senior policy advisor at Ecology and Environment, Inc. He was an avid backcountry and alpine skier, sailor, runner and Ironman triathlete, passions he continued to enjoy even after being diagnosed with metastatic cancer nearly two years ago. Music was a central part of Rick's life from an early age and an enduring source of joy that he shared with friends, loved ones, and strangers alike. He began playing guitar as a teenager, but by college had transitioned to pedal steel guitar and dobro. Throughout the 1970's and 1980's he was a member of prominent local band "Badge." More recently he was an active member of the "Lazy Suns" and "Red Haired Strangers," and even recorded and released an album of original music with the former earlier this year.

Spotlight on Organics

Potential Food Scraps Legislation for New York State

NYSDEC is supporting legislation to increase food donation and food scraps recycling in New York State. The legislation would require, starting in 2021, large food scraps generators (more than 2 tons per week) to donate edible food and to recycle food scraps if there is a viable organics recycling facility within 50 miles of the generator. The law would help increase donation in the State to help those in need and would help spur the development of organics recycling facilities that can handle food scraps. DEC would be required to promulgate regulations to implement the program and will be providing outreach and education to assist in implementation. Other states in the northeast have already put similar laws and regulations in place and DEC and others in support of this legislation are hoping to build on this momentum.

Oneida-Herkimer Solid Waste Authority Feasibility Study On Commercial SSO

The Authority is currently working on a feasibility study related to commercial source separated organics recovery. The study is specifically focusing on key elements associated with a potential project utilizing local, source separated organics as a high strength feedstock for anaerobic digesters planned as upgrades to the Oneida County Water Pollution Control Plant located in Utica. The Authority’s Eastern Transfer Station is directly adjacent to the proposed digesters. The study will evaluate potential quantities of source separated commercial organics, organics collection, project costs including building an addition to the transfer station where processing would occur, processing technology, and impacts to the existing Oneida-Herkimer solid waste management infrastructure.

A New Marketing Option for Organics Programs - Naturcycle, LLC

Naturcycle, LLC is one of the latest marketing options for compost producers in New York, having a service territory reaching from White Plains to Buffalo. With a decade of compost marketing experience, company Founder and President, Charles Duprey is focused on “Restoring Earth” through compost uses and marketing of compost, mulch and other organic residuals. Growth can be seen in compost applications like Erosion Control, Remediation, and Soil Blends and Naturcycle’s specialty is connecting the right compost to the right use. Naturcycle’s involvement with the US Composting Council and NYSAR3 provide crucial tools to educate others on compost, and helping to connect producers of high quality compost to the best end users in each region while educating contractors, architects and regulators on compost use. Learn more about Naturcycle at www.naturcycle.com.



Heat Exchange Recovery Systems for Compost Operations

Gaelan Brown, Vice President Sales/Marketing, Agrilab Technologies, Inc

Utilizing the residual heat of composting has a long history. Optimizing heat recovery systems is where development happens. Since 2009 when SUNY-ESF graduate Brian Jeros joined with business partner Josh Nelson to expand company development, Agrilab Technologies has improved on its original patented heat exchange process to lower cost and improve heat exchange efficiency. Agrilab Technologies offers the Compost Hot Box and the Compost Hot Skid platforms for ASP compost processing. Their Compost Drum Dragon is specific for rotary drum/in-vessel systems. Either ASP or drum/in-vessel designs can provide computer-controlled aeration and heat recovery. Process enhancements include computer controls, full data monitoring, recirculation of ASP exhaust back into the compost for material moisture management and thermal efficiency, variable speed drives and modular scalable plug and play systems.

“The Agrilab Technologies aeration and heat recovery composting process is one way for farms, food producers and compost sites to convert waste streams into profit centers, while creating positive ecological impact in terms of renewable energy and building of organic soil matter for sustainable agriculture,” says Gaelan Brown, vice president of sales and marketing for Agrilab Technologies. “Most companies are looking to save money on operations and reduce their negative environmental impact. In many cases, those two values conflict with each other. But, with the Agrilab Technologies process, sites can save money and create strong positive environmental impact.” For more information visit www.AgrilabTech.com

RIGHT: Agrilab Compost Drum Wagon

BELOW: Charles DuPrey, founder and president of Naturcycle



Around the State

OCRRA's Mercury Thermostats and Thermometers Collection

In October, the Onondaga County Resource Recovery Agency (OCRRA), in partnership with local Waste-to-Energy facility operator Covanta Onondaga and non-profit Thermostat Recycling Coalition (TRC), hosted a collection event for mercury-containing thermostats and thermometers.

Over 240 Onondaga residents responded by dropping-off 395 thermometers and 290 thermostats which cumulatively contain approximately three and a half pounds of mercury, equivalent to the amount of mercury in 310,000 compact fluorescent bulbs. Each resident received a \$10 gift card, courtesy of Covanta, in exchange for the collected devices which were recycled by TRC at no cost.

What items contain mercury?

- Thermometers containing mercury have a silver, metallic grey or black filling in their tubes. If the filling is red, blue, purple, green or any other color, it is not a mercury thermometer and can be thrown in the trash.
- Thermostats containing mercury have levers or dials that you must physically move to change the temperature. If you remove the faceplate of your thermostat and see one or more glass ampoules containing a silver substance, it is a mercury thermostat. If the thermostat is digital / programmable, it does not contain mercury and can go in the trash.

Mercury is a heavy metal that can represent a threat to human health and the environment when disposed of irresponsibly. For more information on mercury thermostat recycling, please visit www.thermostat-recycle.org



Andrew Radin receives "Carbon Neutral Certificate" from TRC's Piper Mlsna in recognition of the 66 tons of emissions reduced through purchase of carbon offsets for OCRRA's October mercury collection event.

Pictured (l-r) Andrew Radin, OCRRA, Ann Fordock, OCRRA, Piper Mlsna, TRC, Kenneth Armellino, Covanta.

Oneida-Herkimer Solid Waste Authority Host Community Benefit Improvements

As part of its' host community benefits program the Oneida-Herkimer Solid Waste Authority recently reconstructed a portion of the NYS Route 294 & NYS Route 46 intersection located within the Village of Boonville. The construction project which widened the intersection, was fully funded by the Authority. It included installation of new drainage structures and pipes, sidewalk and curb improvements, pav-

ing, installation of streetscape elements and landscaping. In addition, the parking lot of the nearby Erwin Library was improved and a handicap ramp was installed at the adjacent Dodge Pratt Institute. The project was facilitated by the Authority's demolition of an old retail building on site which allowed for the new library parking lot and other improvements.

Staten Island Considers Curbside Collection of E-Waste

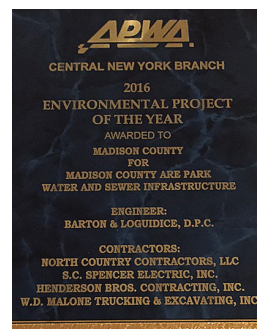
As reported by Bobby Elliott in Resource Recycling News, New York City is considering expanding its current Staten Island based pilot program for the on-call curbside pickup of residential electronic wastes. The pilot program, which allows residents to schedule curbside pickup of electronics, has been successful at significantly reducing illegal dumping of electronics including laptops, desktop computers, printers, and peripherals. Extending curbside service into Manhattan, Brooklyn, Queens, or the Bronx, NYC Department of Sanitation hopes to see similar successes in curbing illegal dumping. Free curbside pickup for electronics, providing for their collection and recycling, is fairly unique, with few urban centers providing the service. "The program has been very well received" says spokesperson Belinda Mager. "DSNY is hoping to expand the pilot into other locations in the City."

Madison County Department of Solid Waste and Sanitation

Projects, projects and more projects! Staff, engineers and contractors were busy throughout 2016 with the landfill expansion and the Agricultural and Renewable Energy (ARE) Park water and sewer projects. Clear weather throughout spring, summer and fall helped workers stay on schedule.

The landfill expansion began in early spring 2016 and will be ready for use by spring 2017. This includes Cells 8&9 and will be total 6 1/3 acres. Approximately 5,800 tons of shredded tires were used for the upper primary drainage layer, saving the County money and resulting in the beneficial use of an estimated 500,000 plus tires.

Madison County's Dept. of Solid Waste and Barton & Loguidice, D.P.C. were awarded Environmental Project of the Year from the Central Branch of the American Public Works Association's for its ARE Park Water and Sewer Infrastructure Project. These projects are key to attracting future businesses to the ARE Park located



TOP: Water Tower at Madison County ARE Park

BOTTOM: APWA Environmental Project of the Year

Around the State (Cont.)

next to the landfill on Buyea Rd. in the Town of Lincoln.

The sewer line was completed in August 2016 with zero interest funding received through the NY State Environmental Facilities Corporation. Leachate from the landfill is now piped directly into the sewer system and is treated at the City of Oneida Wastewater Treatment Plant.

In March of 2015, Governor Cuomo announced a \$4 million grant in NY Works funding to extend municipal water service to the ARE Park, as well as residents of the Town of Lincoln. This investment leveraged \$4 million in county funding for the \$15.7 million project, creating a shovel-ready site for potential businesses.

The water project, involving two holding tanks and pump stations, moved along at a rapid pace with the 113 ft. pedestal and 122,700 gallon water storage tank on top completed in December, 2016.

The County has also seen the first tenant move into the ARE Park. Johnson Brothers Lumber, a local family owned and operated business, purchased low cost land from Madison County as the site for five new drying kilns to service their recently expanded saw mill in Cazenovia, New York. This land purchased from the County has been put back on the tax rolls.

Johnson Brothers is using the excess heat from the Gas-to-Energy plant at the main landfill to dry their lumber. They are the first company to take advantage of the excess heat produced by the Gas-to-Energy facility owned and operated by Waste Management Inc. The 5,400 square foot facility went online in March 2016 and is capable of holding up to 280,000 lbs. of green lumber worth an average of \$75,000 in each of its five kilns. Lumber is purchased locally, within a 90 mile radius of the Cazenovia mill and sold throughout the United States and internationally.



Johnson Brothers Lumber Kilns at Madison County ARE Park

Ontario County

Ontario County, working with its partner, Casella Waste Systems, received its permits for the expansion of the Ontario County Phase III Landfill. The permits were issued in December, 2015 and initial construction commenced in March, 2016. The initial development for the expansion incorporated new leachate pump stations, new leachate storage, gas system improvements, and approximately 6.7 acres of additional lined area. Construction completion is anticipated in January 2017.

Development Authority of the North Country (DANC)

As Richard LeClerc puts it, the Development Authority of the North Country’s Solid Waste Management Facility in Rodman, NY has been busy lately! “The new **Leachate Loadout (LLO) Facility** is nearly complete. We have been using it for a few months now. Although significantly better than our old facility (now gone), we are still working out some of the kinks and refining our processes.

We are also in the midst of a **Scale Relocation project**. We currently have a remotely located scale facility. This project will replace our two aging scales and locate them adjacent to a new addition of administrative offices in our Main Administration/O&M Building.

Finally, we are thrilled to announce that we have a Local Materials Management Plan approved by NYSDEC which will be in effect through 2025!”



TOP: Construction of new scale foundations and the building addition at the DANC SWMF

BOTTOM: The new LLO facility at the DANC SWMF includes two 1.1M gallon leachate storage tanks within a lined secondary containment basin.

Around the State (Cont.)



Chemung County

In June, 2016, Chemung County, working with its partner, Casella Waste Systems, received its permits for expansion of the Chemung County Landfill. The expansion encompasses approximately 36 acres of additional landfill area providing an anticipated site life of approximately 17 years. The initial development under the new permit was completed in October, 2016.

City of Rochester Rolls Out a New Recycling Container to Residents

The City of Rochester has had a robust residential recycling program for over a quarter of a century, but the City saw an opportunity to make a big change to their residential curbside recycling program with the conversion of the Monroe County Recycling Center from a dual stream facility to a single stream facility. In early 2015 the City undertook a pilot program where they provided a new 96 gallon recycling wheeled cart to a couple routes to determine if using the container benefited their customers and increased recycling. New automated recycling trucks were piloted, and every other week collection of recyclables was started as well. After getting great results from the pilot program – both with increased participation and increased recycling rates – the City decided to provide all residents that are participating recyclers a new 96 gallon recycling container through a phased approach starting in November 2016. At this time, the City is slowly distributing wheeled recycling carts to residents and adding routes. The initial feedback from the roll out program has been that residents that did not recycle previously are showing an interest in getting a cart and learning to recycle right! Education is a key to the success of the program and the City will continue to add to their recycling campaign as the program continues. At full roll out, the City expects to see a significant increase in recycling.

LEADERSHIP CHANGES

Onondaga County Resource Recovery Agency - OCRRA



Dereth Glance

The Onondaga County Resource Recovery Agency (OCRRA), a public benefit corporation that provides essential trash and recycling services to Onondaga County, NY residents announced the selection of Ms. Dereth Glance as its new executive director. Glance brings extensive knowledge of OCRRA to the position, having served on its board of directors for six years (2004-2010), including several years as the vice chair and recycling committee chair. Most recently, Glance served as a U.S. Commissioner at the International Joint Commission charged with preventing and resolving disputes and promoting cooperation for the shared waters of the United States and Canada. Prior to that, Glance served as the Executive Program Director of the Citizens Campaign for the Environment, directing water, energy and waste reduction programs for five regional offices in New York and Connecticut. Glance began at OCRRA in September.

PRESIDENT'S CORNER

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provided the NYSDEC comprehensive comments outlining our opposition to the proposed food waste mandate. NYSASWM remains committed to the goals of food scrap recovery and the current hierarchy or practice of diverting food from disposal, we remain opposed to any mandate. Toward that end, we continue to make new contacts with other organizations such as the Association of Restaurants that are also in opposition to the proposal. The NYSASWM Board also recently approved joining/funding an Amicus Brief in support of the Town of Brookhaven at the Appellate Division, Second Department regarding the use of 120-w for bidding and solid waste contracting.

It looks like 2017 will be just as busy as 2016. The Board is committed to continue our work on your behalf.

Happy New Year.

Upcoming Events

Federation of NY Solid Waste Associations Announces 2017 Conference & Opportunities



BOLTON LANDING, NY – Whether you are looking to make customer contacts and build your brand, differentiate your products and services from competitors, or maintain your competitive edge, you will find the perfect fit in the exhibitor, sponsorship and advertising opportunities through the 2017 Federation of New York Solid Waste Association's Conference and Trade Show. The conference runs May 21–24 at The Sagamore in Bolton Landing, NY.

WHO: New York Federation of Solid Waste Associations

WHAT: *Strive for Sustainability*

Solid Waste & Recycling Conference with Trade Show

WHEN: May 21-24, 2017

WHERE: The Sagamore, Bolton Landing, NY

Visit www.nyfederation.org for more information and to sign on today

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the
Date!!

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- NYSDEC Endorsed Landfill Operator Certification
- 6 Continuing Education Hours for P.E.'s
- Special Feature: Tour of OCRRA's Amboy Compost Facility
- Contact Jodi Tuttle — 315-733-2305 — jodit@ohswa.org for registration information or register online at www.nysaswm.org

Awards

Kevin E. Voorhees was honored with the NYSASWM Solid Waste Achievement award at the 2016 fall conference in Lake Placid. He was presented the award by NYSASWM President Bill Rabbia, who enumerated many of the accomplishments that led to his nomination for this award.

Kevin has been active in NYSASWM for over 30 years. As NYSASWM's Legislative Chair, Kevin's contributions have been invaluable. He has helped the Board follow and interpret legislative issues, and analyze and concisely respond to NYSDEC regulatory changes. He has been an excellent counsel not just to board presidents, but to anyone who needs it.

Kevin joined the firm of Barton, Brown, Clyde & Loguidice in 1980 which later became Barton & Loguidice. Initially he had the title of designer, although his responsibilities were to assist clients with complying with the new State Environmental Quality Review Act. He currently holds the position of Principal.

Over the years, Kevin has helped guide many solid waste projects through regulatory, SEQR and permitting issues. Whether it was siting a new landfill, waste to energy facility, or a simple permit renewal, Kevin has always been there to help when needed.

Significant New York State solid waste projects Kevin has been involved with include the siting and permitting of the DANC Solid Waste Management Facility, the Oneida-Herkimer Regional Landfill, the Oneida County Waste to Energy Facility, the Oswego County Waste to Energy Facility, and the expansions of many landfills including the Franklin County, Steuben County and the Mill Seat site. He also assisted many planning units across the State with development of Solid Waste Management Plans and implementation of many recycling and waste reduction programs. In addition, Kevin has also aided many municipalities with the development and negotiation of energy and operating contracts.



Kevin's work ethic has been unparalleled which lead to his previous receipt of this award in 1998. Kevin is not just there for us to consult on projects and solid waste issues, he has always been a great friend and confidant.

Kevin E. Voorhees (L) is presented the NYSASWM Solid Waste Achievement Award by Bill Rabbia

**NEW YORK STATE ASSOCIATION
FOR SOLID WASTE MANAGEMENT**



P.O. Box 13461 ■ Albany, NY 12212

WE'RE ON THE WEB!
WWW.NYSASWM.ORG

WASTELINE

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**NYSASWM
MEMBERSHIP
BENEFITS**

- Discount registration for the Spring Federation Solid Waste Conference and Vendor Show at the Sagamore Hotel in Lake George
- Discount registration for the Annual Fall NYSASWM Conference and Vendor Show
- Discount registration to annual Landfill Operator Training Program
- Subscription to the NYSASWM newsletter— *Wasteline*
- Track legislation on behalf of the membership and alert members to bills that may have an impact on their systems
- Scholarship Program with first consideration given to the children of NYSASWM members
- Countless opportunities for networking & technology transfer as a member of the largest organization representing solid waste managers in New York State

**JOIN NYSASWM
TODAY!**

MEMBERSHIP APPLICATION

New York State Association for Solid Waste Management
Established 1975

Please complete the following:

Check type of membership:

- () Municipal, political subdivision or public benefit corporation
- () Other professional

Name: _____ Title: _____

Company: _____

Mailing Address _____

City: _____ State: _____ Zip: _____

Phone: () _____ Fax: () _____

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* Note that dues are per person (not per company) and are in effect for the calendar year. Please make checks payable to: "NYSASWM" (dues are \$ 75.00 per person per calendar year) and mail to:

New York State Association for Solid Waste Management
Membership Department, P.O. Box 13461, Albany, New York 12212

Please note that while NYSASWM is a not-for-profit organization, membership dues are not tax deductible as a charitable contribution. To the extent permitted under the Internal Revenue Code, dues may be deducted as a business expense.

This newsletter is a membership benefit.