

CITY OF LOS ANGELES
CALIFORNIA



ANTONIO R. VILLARAIGOSA
MAYOR

June 25, 2013

BUREAU OF SANITATION

ENRIQUE C. ZALDIVAR
DIRECTOR

TRACI J. MINAMIDE
CHIEF OPERATING OFFICER

VAROUJ S. ABKIAN
ADEL H. HAGEKHALIL
ALEXANDER E. HELOU
ASSISTANT DIRECTORS

NEIL M. GUGLIELMO
ACTING CHIEF FINANCIAL OFFICER

SOLID RESOURCES
SUPPORT SERVICES DIVISION

JAVIER L. POLANCO
DIVISION MANAGER
1149 SOUTH BROADWAY, 5TH FLOOR
LOS ANGELES, CA 90015
TEL: (213) 485-3605
FAX: (213) 485-2961

BOARD OF
PUBLIC WORKS

COMMISSIONERS

ANDREA A. ALARCÓN
PRESIDENT

CAPRI W. MADDOX
VICE PRESIDENT

VALERIE LYNNE SHAW
PRESIDENT PRO TEMPORE

JERILYN LÓPEZ MENDOZA
COMMISSIONER

STEVEN T. NUTTER
COMMISSIONER

Ms. Kathy Frevert, Coordinator
Department of Resources, Recycling and Recovery (CalRecycle)
Joe Serna Jr., CalEPA Building
Coastal Hearing Room
1001 I Street, 2nd Floor
Sacramento, CA 95814

Dear Ms. Frevert:

COMMENTS ON THE REVISED CALIFORNIA CARPET STEWARDSHIP PLAN

The Bureau of Sanitation (BOS) appreciates the opportunity to review and comment on the Revised Carpet Stewardship Plan (Plan). BOS agrees with the goals and objectives identified by the Plan prepared by the Carpet America Recovery Effort (CARE) organization. Comments below are recommendations that BOS believes are in keeping with the goals and objectives of the Department of Resources, Recycling, and Recovery (CalRecycle), the City of Los Angeles's Solid Waste Integrated Resources Plan (SWIRP), and the State's 75 percent diversion goal.

The following are list of specific comments the BOS has regarding the Plan in discussion:

1. In 2010, Assembly Bill (AB) 2398 was adopted and now three years following the adoption of AB2398 there are 80 carpet manufacturers participating in the Plan nationwide. A great majority of the participants (74) are located outside of California. CARE should reach out to carpet manufacturers within California to fully engage and participate in the Plan.
2. Page 7, under the section "Carpet Stewardship Organization and Participation in the CARE California Carpet Stewardship Plan," 4th paragraph, "The CARE Board of Directors (BOD) includes 19 members...entrepreneurs, government representative, members of the plastics industry..." Reviewing Page 39, Attachment I, Members of CARE Board of Directors, April 2013, none of the members of BOD are government representatives. The Bureau of Sanitation would like to see local government representatives on the BOD for CARE.



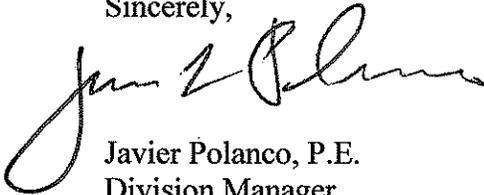
June 25, 2013

Page 2 of 2

3. The Plan, Attachment VIII, lists the twenty (20) carpet recyclers and collectors in the State of California, which Bureau of Sanitation (BOS) believes are not enough recyclers for the 380 million pounds of carpet generated each year in the State. The City of Los Angeles alone disposes of approximately 38 million pounds of used carpet each year and most of the carpet is landfilled. The CARE Plan should include a Producer Responsibility Program, which mandates carpet manufacturers take back carpet that cannot be recycled and reimburse carpet collectors for the collection of the post-consumer carpet.
4. The Plan should include a mechanism to incentivize carpet manufacturers to work with carpet recyclers in finding solutions for recycling carpets made of polyester (PET) that are currently being landfilled.
5. AB2398 allows for a carpet stewardship assessment charge of \$0.05 per square yard, which is equivalent to \$0.01/lb. BOS recommends increasing the assessment charge to \$0.50 per square yard for PET carpet. The monies from the charge should be available to recyclers that recycle PET carpets to help offset costs for processing and finding end-use markets. Additionally, these funds can support outlets for remaining carpet backing components that include both polypropylene and calcium carbonate.
6. CalRecycle designated CARE as the carpet stewardship organization for the carpet industry. Currently, the CARE organization is staffed with only two members covering the entire United States. An increase in staffing will allow CARE to form a broader network of carpet manufacturers, recyclers, collectors, and government agencies in finding solutions to all the goals and objectives stated in the Plan.
7. Page 69, Attachment XI, Recycle Rates vs. Commodities, does not make a fair comparison between carpet and other recyclable commodities. All of the recycling rates should be based on rates reported by CalRecycle. Aluminum cans (CRV) and PET bottles (CRV) recycling rate is in the high 80 percent range.

Once again, we thank you for the opportunity to review the Revised Carpet Stewardship Plan and would be available to meet in person to further discuss the comments provided herein. You may also contact Mr. Miguel Zermeno of my staff at (213) 485-3611.

Sincerely,



Javier Polanco, P.E.
Division Manager
Solid Resources Support Services Division

cc: Enrique Zaldivar, BOS Alex Helou, BOS
Reina Pereira, BOS Miguel Zermeno, BOS