



County of Sacramento

Sacramento County LEA Comments
On the (May 2013) California Carpet Stewardship Plan
Submitted at the Public Workshop
On June 25, 2013

Page/Paragraph	Comment
4/5	1. 2012 statistics show that only 14% of the 33% of old carpet diverted from the landfills was recycled. This demonstrates that many of the "Carpet Collectors/Processors" in the state are required to have a Solid Waste Facility Permit because they are NOT CDI Recycling Centers as defined in Title 14.
4/5	2. A goal stated to increase the percentage of material diverted from landfills but should specify that any diversion must comply with Title 14 Section 17381.1 and the PRC and not result in illegal disposal of carpet.
5/5	3. Unused funds should be earmarked for clean-up of abandoned piles until market sources and technology catches up with the volume of carpet received by "Certified Carpet Collectors".
5/7	4. "Carpet Collectors/Processors" need to be added to the list of those educated under the Plan. They need to be educated about Industry BMP's and Solid Waste Regulations and Permitting requirements.
14/1	5. See comment #4
14/6	6. Should add in sentence: "Expanded opportunities for <u>LEGAL</u> diversion". If material cannot be recycled or reused it must be diverted to a landfill to avoid being illegally disposed pursuant to Title 14.
15/2	7. If "recycling facilities" (called recycling "centers" in Title 14) cannot recycle 90+percent of their incoming material by weight, they are NOT recycling facilities/centers and should not be referred to as such in the Plan; they are Solid Waste Facilities (specifically CDI Transfer/Processing Facilities) by regulatory definition.
18/10	8. While CARE claims no responsibility for "recycling" businesses success, failure to educate Certified Carpet Collectors and Processors of their obligations under the solid waste laws may set those businesses up for

	failure and result in violations of solid waste laws.
19/pie chart	9. Even by the 2016 projection, the percent residual will be far more than the “less than 10%” required currently in Title 14 for these facilities to be considered recycling facilities/centers.
22/4	10. Add to requirements: Must show proof of a valid solid Waste Facility Permit issued by the LEA or a written LEA determination that a permit was not required for the facility at the time of application to CARE to be a “Certified Carpet Collector”.
26/1	11. Add the words “LEGAL” before “landfill diversion”. Refer to comment #6.
27/3	12. This definition is inconsistent with the definition of processing in Title 14.
28/1	13. List of Processing Technologies is inconsistent with definition of “processing” under Title 14 and can result in violations and enforcement action by the LEA for not processing within the 30 day required timeline.
28/2	14. Add to item #6 the requirement to have a Solid Waste Facility Permit prior to accepting or processing material.
31/1	15. Unused Funds should be earmarked for clean-up of abandoned stockpiles of residual carpet and made available to local jurisdictions to aid in remediation efforts. Loan applications should include the criteria of clean-up liability insurance.
31/2	16. Certified Carpet Collectors/Processors should only receive funds for recycling carpet, not for collecting and stockpiling it indefinitely.
33/1	17. The education and outreach section should include education of potential Carpet Collectors or Processors about State Regulatory Requirements and Industry Best Management Practices and ongoing verification of compliance with both should be integral to this program.
34/4	18. See comment #17
37/3	19. Any Certified Carpet Collector who claims to meet the definition of a Recycling Center should be required to submit copies of proof of compliance with 14CCR, Section 17381.1, including residual and processing records, and sources of incoming and outgoing material, to CARE, CalRecycle and the LEA on a monthly basis.
43/definitions	20. The definitions listed that are inconsistent with Title 14 and the PRC include: Collection, Disposal Diversion, Disposal Facility, Filler, Input, Output, and Processing. There is no definitions listed for “Certified Carpet Collector” or “Processor” although the terms are used interchangeably throughout the Plan.
46/1	21. Potential environmental impacts, not included in the Plan, but associated with stockpiling of carpet, carpet backing or carpet fibers include illegal dumping, vector

	<p>harborages, fire hazard, and storm water contamination from uncontrolled, untreated leachate entering storm drains. A storm water permit may be required if processes cause potential pollutants to migrate off - site. Additionally, sand, a bi-product of carpet processing, meets the definition of Hazardous Material, and handling it may require a Hazardous Materials Business Plan in most jurisdictions.</p>
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