



County of Sacramento

November 27, 2013

Attention: Kathy Frevert
Department of Resources Recycling and Recovery
1001 I Street
PO Box 4025, MS 13A
Sacramento, CA 95812
Submitted via email: carpet@calrecycle.ca.gov

**SUBJECT: SACRAMENTO COUNTY LOCAL ENFORCEMENT AGENCY (LEA) COMMENTS
ON REVISED CARPET STEWARDSHIP PLAN**

Dear Ms. Kathy Frevert:

The Sacramento County Environmental Management Department (EMD) is certified by CalRecycle to act as the Local Enforcement Agency (LEA) for all the cities and county of Sacramento. We appreciate the opportunity to provide comments on the October 28, 2013 Revised California Carpet Stewardship Plan (Plan) by Carpet America Recovery Effort (CARE).

The basis for most of our (attached) comments on the Revised Plan stems from the fact, as stated in the Plan, that only 16 percent of carpet and carpet related material is able to be recycled or legally diverted from the waste stream currently. While CARE hopes this percentage will climb to 24 percent by 2020, it still falls far below the 95+ percent necessary for a carpet recycler/collector/processor to be exempt from the requirement in 14 CCR to obtain a solid waste facility permit, typically a CDI Transfer Processing Facility, from the LEA. Since this is a California specific plan we strongly advise that California specific laws and regulations that govern these operations be identified in the Plan as the current system of "self-certification" is inadequate to ensure compliance with state law and a level playing field within the industry.

Please feel free to contact me at jamesonl@saccounty.net or (916) 876-7883 if you have any questions about our comments. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Jameson".

Lisa Jameson, REHS
LEA Program Supervisor
Environmental Compliance Division

LJ:jm



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