

CALCIMA

California Construction and
Industrial Materials Association

Sept. 16, 2013

Tracey Harper
CalRecycles
1001 "I" Street
Sacramento, CA 95814

Re: ARB/CalRecycle AB 32 Scoping Plan Workshop: Waste Management Sector Component

Dear Tracey:

The California Construction and Industrial Materials Association (CALCIMA) offers comments on the technical paper, "Recycling, Reuse and Remanufacturing." We particularly appreciate the technical paper's focus on waste generated in California and the need to take ownership for that waste.

We appreciate the inclusion of many of our previous comments regarding the recycling, re-use, and re-manufacturing of aggregates, concrete, and asphalt. We offer few additional comments to help clarify the current status of recycling for these materials and the opportunities to expand that recycling. In particular, the comments emphasize how concrete and asphalt can be reclaimed not only for aggregate base materials but increasingly to make concrete and asphalt. Proposed changes are in italics.

III – page 4 – add at the end of the last line of the 1st paragraph after, "For example, most of the concrete and asphalt is crushed and converted to aggregate during the initial processing for use as road base"

However, increasingly, reclaimed or returned asphalt and concrete can be remanufactured into new asphalt and concrete products. For asphalt, Caltrans currently allows up to 25% reclaimed asphalt pavement (RAP) in hot mix asphalt (HMA) pavements. The City of Los Angeles allows up to 50% RAP in HMA under certain contracts. The Greenbook Standard Specifications for Public Works, which is widely used in Southern California, requires 15% RAP as a minimum in HMA. In addition, HMA pavement can also incorporate the use of reclaimed asphalt shingles (RAS). Caltrans recently adopted specifications to allow use of up to 5% RAS in HMA pavements.

For concrete, Caltrans has specifications to allow use of reclaimed concrete aggregates in minor concrete. The Greenbook Standard Specifications for Public Works also allow use of reclaimed concrete aggregates to make new concrete, as well as up to 15% returned fresh concrete in a concrete mix. The CA Green Building Code has voluntary provisions (Section A5.405.5.3.2) to encourage use of reclaimed aggregate in making concrete. Finally, Caltrans is in the process of developing a specification to allow use of returned fresh concrete in minor concrete applications.

IV – A – What Regulations have an impact on recycling and remanufacturing recycled materials?

Page 7 – 2nd to last bullet re Greenbook,

Suggest changing the term "returned plastic concrete" to "returned *fresh* concrete." This is the term used recently in AB 221 (Quirk-Silva), which up-dated Public Resources Code sections 16000-16004 regarding recycled concrete.

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www.calcima.org
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Page 7 – add to the last bullet re California Green Building Standards Code,

In addition, the California Green Building Code has voluntary provisions to encourage the use of recycled aggregates and water to make concrete (Section A5.405.5.3.2).

V – Challenges to Meeting Goals – A – Short Term – Market Development – 2nd bullet - page 9

Lack of adequate specifications and acceptance of the use of reclaimed or recycled C&D materials (RAS, RAP, *reclaimed concrete materials, returned concrete, etc.*) *to make new asphalt and concrete for paving applications and other applications* at both the state and local levels. *For instance, there are at least 10 city and county governments that do not allow the use of RAP in HMA.*

This change is suggested since the current sentence seems to focus only on asphalt and pavement, when there is also concrete and other applications.

VI – Potential Solutions – A – Short Term – Market Development – 3rd bullet – page 11

Replace “paving applications” with “to make new asphalt and concrete for paving ~~applications~~ *and other applications*”

This change is suggested since the current sentence seems to focus on asphalt and pavement, when there is also concrete and other applications.

Sincerely,



Charles L. Rea
Director, Communications & Policy