

From: Veronica Pardo [mailto:veronica@crrcnorth.org]
Sent: Friday, March 21, 2014 1:17 PM
To: Dunn, Cynthia@CalRecycle
Cc: Ralph Chandler
Subject: Informal Draft Regulations: Mattress Recycling

Hello Ms. Dunn,

I am writing to you for some clarification regarding your recently released "Used Mattress Recovery and Recycling Program Informal Draft Regulatory Text".

As you know, I will be serving as a solid waste industry representative on the MRO advisory committee. The CRRC is looking forward to an efficient and effective CA mattress recycling program and playing a role in its development.

I noticed in your recent informal draft regulatory text the inclusion of a "solid waste facility annual report" that shall be submitted upon request of the department. Meanwhile, the statute language in Chapter 388, Statutes of 2013 (Hancock, SB 254) states that a solid waste landfill facility operator shall report to the department if requested, not all solid waste facilities. This makes good sense in terms of tracking the ultimate disposal of mattresses.

Are you aware of the inconsistency in language between the statute and the informal draft regulations? Is this something that will be taken care of in the next draft of regulations, or will this need to be resolved in a more formalized manner?

I would really appreciate your perspective on this matter.

Many thanks!

Veronica Pardo, Regulatory Affairs Associate

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