
From: Mark Murray [murray@cawrecycles.org]
Sent: Tuesday, April 24, 2012 1:43 PM
To: Dunn, Cynthia
Cc: mzarrehparvar@paint.org
Subject: CAW's comment letter on Paintcare Stewardship Plan
Attachments: caw paintcare stewardship plan.pdf

Dear Ms. Dunn,

We would ask that CalRecycle 'conditionally approve' the Paintcare Stewardship Plan at this time and come back in one year when greater collection data and experience is available.

We are concerned that the proposed plan may be deficient in several areas:

1. **Lack of Collection goal and Uncertain Generation Data.** We are cognizant that there is no current agreement or readily quantifiable data on the current volume of used paint that is generated, collected for recycling, and disposed. For this reason we recognize that it may be difficult to establish a meaningful 'volume-based' collection goal. That said, we believe that in order for the 'stewardship model' to have credibility, it must ultimately have and meet meaningful performance goals.

Extrapolating the data from several widely acknowledged as 'well run' collection programs, it would appear that Paintcare's estimated the baseline data for generation of leftover paint at just .15 gal/person is quite low (pg. 23 of Stewardship plan). With some current collection programs reporting higher levels of used paint actually collected for recycling (as much as 0.17 gal/person), we believe that the volume of used paint actually generated could be double what Paintcare is projecting.

Recommendation. We ask that CalRecycle conduct an extrapolation of some current paint collection program, such as Tehama, San Luis Obispo and San Francisco, to get a better idea of how much leftover paint is out there.

2. **Insufficient collection Locations.** Paintcare has proposed just 750 collection sites, which is just 15% more than the current (inadequate) infrastructure. By comparison, California has more than 1,500 collection sites for e-waste and 2,465 sites for beverage containers. Since consumers are being charged a paint recycling fee by manufacturers, they deserve a real and meaningful paint recycling effort. The solution to increasing paint recycling in California is simple: increase retail collection locations to make it more convenient for consumers to drop off their used paint.

In addition, the stewardship plan does not list what would happen if Paintcare does not get enough retailers interested in participate in the program. For all the reasons stated above, we would ask that the stewardship plan be 'conditionally approved' at this time.

Sincerely,

Mark Murray
Executive Director

cc. Marjaneh Zarrehparvar, Executive Director



Californians Against Waste

Conserving Resources. Preventing Pollution. Protecting the Environment.

April 24, 2012

Cynthia Dunn
Materials Management and Local Assistance Division
CalRecycle
P.O.Box 4025
Sacramento, CA 95812-4025

RE: Paintcare Stewardship Plan – Support for Conditional Approval

Dear Ms. Dunn,

We would ask that CalRecycle ‘conditionally approve’ the Paintcare Stewardship Plan at this time and come back in one year when greater collection data and experience is available.

We are concerned that the proposed plan may be deficient in several areas:

1. **Lack of Collection goal and Uncertain Generation Data.** We are cognizant that there is no current agreement or readily quantifiable data on the current volume of used paint that is generated, collected for recycling, and disposed. For this reason we recognize that it may be difficult to establish a meaningful ‘volume-based’ collection goal. That said, we believe that in order for the ‘stewardship model’ to have credibility, it must ultimately have and meet meaningful performance goals.

Extrapolating the data from several widely acknowledged as ‘well run’ collection programs, it would appear that Paintcare’s estimated the baseline data for generation of leftover paint at just .15 gal/person is quite low (pg. 23 of Stewardship plan). With some current collection programs reporting higher levels of used paint actually collected for recycling (as much as 0.17 gal/person), we believe that the volume of used paint actually generated could be double what Paintcare is projecting.

Recommendation. We ask that CalRecycle conduct an extrapolation of some current paint collection program, such as Tehama, San Luis Obispo and San Francisco, to get a better idea of how much leftover paint is out there.

2. **Insufficient collection Locations.** Paintcare has proposed just 750 collection sites, which is just 15% more than the current (inadequate) infrastructure. By comparison, California has more than 1,500 collection sites for e-waste and 2,465 sites for beverage containers. Since consumers are being charged a paint recycling fee by manufacturers, they deserve a real and meaningful paint recycling effort. The solution to increasing paint recycling in California is simple: increase retail collection locations to make it more convenient for consumers to drop off their used paint.

In addition, the stewardship plan does not list what would happen if Paintcare does not get enough retailers interested in participate in the program. For all the reasons stated above, we would ask that the stewardship plan be conditionally approved' at this time.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Murray". The signature is fluid and cursive, with the first name "Mark" being more prominent than the last name "Murray".

Mark Murray
Executive Director

cc. Marjaneh Zarreparvar, Executive Director