



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

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Rand Martin
Rose and Kindle
915 L St. suite 1210
Sacramento, CA 95814

Mr. Martin,
Thank you for your recent comments regarding the Scope of Work (SOW) for the Used Oil Life Cycle Analysis (LCA) contract developed as part of the LCA Project.

The following are in response to your comments:

1. We agree that the statute requires the creation of report, not a model.
2. We have not received any suggestions regarding the creation of new or additional phases of the LCA. The SOW is clear that the International Organization of Standardization (ISO) guidelines will be used throughout the course of the Project.
3. Public Resources Code §48651.5(b)(1)(D) states "On or before January 1, 2014, [CalRecycle shall] submit a report to the Legislature describing the findings of the life cycle analysis and the evaluation of the used oil management policies on used oil collection rates specified in subparagraph (C) and provide any recommendations for statutory changes that may be necessary to *promote increased collection and responsible management of used oil.*" (emphasis added). Clearly, this mandate requires the identification of potential measures that would increase used oil collection and responsible (and by extension, safe) management of used oil. Accordingly, these issues are included as part of the LCA Project.
4. The SOW refers only to an LCA as is consistent with ISO standards 14040 and 14044.

The final version of this SOW will be brought to the CalRecycle Public meeting on March 15, 2011. If you would like an opportunity to discuss this further, please attend this meeting. Details regarding this meeting can be found on the CalRecycle website at <http://calrecycle.ca.gov/Calendar/>

Sincerely,


Howard Levenson, Ph. D
Deputy Director
Materials Management and Local Assistance Division

cc (email only):
Mark Phariss, Safety-Kleen
Lisa Grice, Environ

