

From: Nat Isaac [mailto:nat.isaac@lacity.org]
Sent: Thursday, July 16, 2015 3:42 PM
To: Mattress EPR <mattresses@calrecycle.ca.gov>
Subject: Comments on Completeness of Mattress Recycling Stewardship Plan

Ashley Harley and Nicole Castagneto
Materials Management and Local Assistance Division
California Department of Resources, Recycling and Recovery (CalRecycle)
P.O. Box 4025 Sacramento, CA 95814

Ms. Harley and Ms. Castagneto,

Please see the attached letter containing comments by the City of Los Angeles on the completeness of the proposed Mattress Recycling Stewardship Plan for the Used Mattress Recovery and Recycling Program. Let me know if you have any questions.

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July 16, 2015

Ms. Ashley Harley and Ms. Nicole Castagneto
Materials Management and Local Assistance Division
California Department of Resources Recycling and Recovery (CalRecycle)
1001 I Street
Sacramento, CA 95812-4025
mattresses@calrecycle.ca.gov

Dear Ms. Harley and Ms. Castagneto:

CITY OF LOS ANGELES, SANITATION COMMENTS ON PROPOSED MATTRESS RECYCLING STEWARDSHIP PLAN REGARDING PLAN COMPLETENESS

The City of Los Angeles (City) generates over 10 million tons per year of solid waste and has a robust, comprehensive recycling program, with a landfill diversion rate over 76%. Moreover, Mayor Eric Garcetti through the City's Sustainability pLAN is committed to having Los Angeles "become the first big city in the US to achieve zero waste, and recycle and reuse most of its waste locally."

Upon review of the proposed Mattress Recycling Stewardship Plan (Plan), LASAN would like to submit the following comments:

- ❖ The Plan's section on Research can be strengthened by describing the market development activities that will be conducted in order to ensure these recycled materials will be beneficially reused. The Plan only states that the Mattress Recycling Council (MRC) MAY conduct research, or INTENDS to explore, but does not specifically state what the MRC WILL do to enhance the end use of recycled materials which may be stockpiled or disposed at landfills if no markets are developed,
- ❖ The City of Los Angeles operates over 700 solid resources collection vehicles and is willing to partner with the MRC in its Plan's section on research development for transportation vehicles to efficiently collect and transport mattresses from public areas to a recycling facility,
- ❖ The Plan's section on Annual Report should list the criteria required by Section 18964(b) of the Regulations that guides the development of the Annual Report,
- ❖ As per the requirement of Section 42987.1(k) of the Regulations, the Plan proposes to offer a monetary incentive to residents delivering their mattresses directly to an MRC designated

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location and limits the incentive to five (5) units per person per day as of way of reducing scavenging activities. Per California Business and Professions Code Sections 21605 and 21606, the Plan also needs to specify the capture and handling of information that recyclers need to capture from each individual delivering mattresses to their facilities, and

- ❖ The section on illegally dumped mattresses states that units collected through bulky item and curbside pickup services are not eligible for such reimbursement because they are not illegally dumped. The Plan needs to describe how it proposes to distinguish between illegally dumped units and units collected by bulky-item programs that are delivered to recyclers.

We thank you for the opportunity to comment on the proposed Mattress Recycling Stewardship Plan and we look forward to working with you in the future. If you have any questions regarding our comments, please contact Nat Isaac of my staff at 213-485-3593.

Sincerely,



ENRIQUE C. ZALDIVAR, Director
LA Sanitation

ECZ/AEH: NI

c: Greg Good, Mayor's Office
Kevin James, Board of Public Works
Heather Repenning, Board of Public Works
LASAN Executives
LASAN Solid Resources Division Managers