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PROGRAM MANAGER – MARY PITTO

## MEMORANDUM

**To:** ESJPA Board of Directors  
**From:** Mary Pitto, Program Manager  
**Date:** August 16, 2011  
**RE:** Paint and Carpet Product Stewardship Programs

Two producer responsibility bills were enacted in 2010: AB 1343 (Huffman) paint recycling and AB 2398 (Perez) carpet recycling. Both bills require manufacturers or designated stewardship organizations to submit stewardship plans to develop and implement a recovery program and manage the end-of-life of postconsumer products, including collection, transportation, processing, and disposal. The plan is required to be reviewed and approved by CalRecycle and to include a product stewardship assessment on the products sold in this state. After a plan is approved by the department, the manufacturer or stewardship organization is required to implement the stewardship program.

In addition to the program development, CalRecycle will need to adopt regulations to administer the program. CalRecycle must go through a formal rulemaking to clarify the statutes for items including stewardship plan approval criteria, a process for CalRecycle to accept payment for its services related to oversight and enforcement activities, the establishment of a progressive enforcement approach, and criteria for acceptance of annual reports. Both program development and the rulemaking efforts are occurring simultaneously, and on a fast track, to meet the required deadlines in the bills. The ESJPA has been participating in the development of both programs and the accompanying CalRecycle regulations to ensure the challenges in rural areas are considered and addressed. The regulations outline the framework for product producers to submit their stewardship plan to CalRecycle for approval. The product stewardship plans must contain collection infrastructure throughout California, including our rural counties.

CalRecycle is beginning the formal stewardship regulations rulemaking for both paint and carpets on July 22, 2011. The written comment period for this rulemaking closes at on September 5, 2011. A public hearing will be held on September 8, 2011 for additional testimony. While both proposed regulations currently contain language for requiring a statewide infrastructure, RCRC plans to submit written comments primarily to reinforce that the programs need to be made available in our rural counties.

To view a copy of the proposed paint regulations, go to:  
<http://www.calrecycle.ca.gov/Laws/Rulemaking/Paint/ProposedPaint.pdf>

To view a copy of the proposed carpet regulations, go to:

<http://www.calrecycle.ca.gov/Laws/Rulemaking/Carpet/PropsdCarpet.pdf>

*Product Stewardship for Carpets.*

With the passage of AB 2398, the carpet product stewardship law, since July 1, 2011, money is now being collected on the sale of carpet (\$0.05/sq.yd.). The money is intended to be used to achieve *measurable improvements* in the landfill diversion and recycling of postconsumer carpet. As provided in statute, the Carpet America Recovery Effort (CARE) is the stewardship organization designated to implement the initial program. As currently devised by CARE, the money is planned to be used as incentives for the processors/recyclers, and not for transportation costs to the processing/recycling facilities. The ESJPA is working with CalRecycle staff and CARE to develop a stewardship plan that provides recycling opportunities in our rural counties that will not increase the counties' costs to manage post consumer carpet. These plans are due to CalRecycle by September 30<sup>th</sup>, 2011, with the deadline for plan approval of March 31, 2012. Manufacturers/retailers are subject to the plan commencing April 1, 2012, and thus subject to enforcement if not in compliance.

The language in the proposed regulations specifically states that the collection system must include the following: "Description of how each consumer that pays a carpet stewardship assessment, including but not limited to those in rural areas, will have an opportunity to conveniently and properly manage their post-consumer carpet." However, it was evident from the initial discussions and meetings that there is not a simple solution or way to deal with our concerns. There are few recycling facilities in California and not many more processing facilities, none north of Sacramento. Our biggest hurdle and cost is transportation to the facilities. It was decided that one approach would be to test several pilot projects to determine how carpet recycling can be economically feasible in our rural counties.

The ESJPA met with CalRecycle, CARE, a carpet recycler, and several ESJPA members to develop and initiate the pilot programs. The ESJPA asked for willing county participants and each of those expressing interest will be participating in the pilot projects: Calaveras, Del Norte, Plumas, Siskiyou, and Tehama. The ESJPA staff will obtain some preliminary information from the counties. Then the processors/recyclers will contact the counties with more specific questions to identify opportunities and determine feasibility. Participating counties could receive calls from multiple carpet transporters or processors/recyclers to negotiate the collection infrastructure and cost of transportation. If it is determined to be feasible (it is free or costs less to recycle than to dispose at the landfill), a site visit will be scheduled with the processor/recycler, CARE, CalRecycle, and the ESJPA to work out the infrastructure and outreach details. This is expected to occur the week of October 11<sup>th</sup> or the following week.

Quite frankly, it is highly possible that the processors/recyclers may determine it is not economically feasible for a county to participate in carpet recycling without financial assistance. If this is the case, the site visit will not be scheduled and that finding will be submitted to CalRecycle for their consideration while evaluating the carpet stewardship plan(s) submitted by CARE and any others. If the program does go forward to the implementation stage, then the processor/recycler will help educate and train collectors and assist with the educational brochure. The education and collection

would begin in November (slow season) and run through June, with the results included in CARE's first annual report.

As a pilot participant, the county and the collector (county or retailer) will need to assist in the outreach and education of consumers/installers and collect the diverted and landfilled carpet data and costs. The pilot information will be reviewed for lessons learned and to measure the success of the program. The information will then be folded into CARE's annual report to CalRecycle and update to the carpet stewardship plan as appropriate.



**Mary Pitto**

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**From:** hhwie@yahoogroups.com on behalf of Marjaneh Zarrehparvar [mzarrehparvar@paint.org]  
**Sent:** Monday, August 08, 2011 11:22 AM  
**To:** hhwie@yahoogroups.com  
**Subject:** [hhwie] PaintCare Coordination

Dear CA-HHW Coordinators,

As you're probably aware, PaintCare has begun the process to develop a CA Paint Stewardship Program. A key component of PaintCare's collection infrastructure will continue to be HHW collection facilities and other paint collection opportunities currently coordinated by local governments (e.g. one-day events, retail collection, etc.). As such, we have made an effort to contact each HHW program in CA and visit as many in person as possible to discuss transitioning your paint recycling programs/costs to PaintCare.

If your City or County has not been in contact with PaintCare, please let me know asap as we have further trips scheduled for this fall and want to include you.

As a reminder, per AB 1343, PaintCare needs to submit a Stewardship Plan to CalRecycle by April 1, 2012, and have a Stewardship Program in place by July 1, 2012. Again, we want to make sure your paint collection programs are included in the PaintCare Plan and Program, so please be in touch if you have not spoken with us yet.

Many thanks, Marjaneh

Marjaneh Zarrehparvar

Executive Director



paintcare.org

(202) 719-3683

1500 Rhode Island Ave, NW

Washington, DC 20005

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# California Rural Communities Carpet Recycling

Georgina W Sikorski  
 Carpet America Recovery Effort (CARE)  
 August 2, 2011



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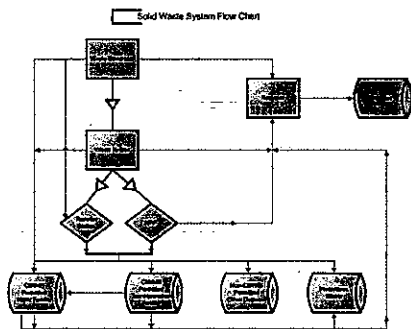
## Team

- The California Department of Resources Recycling and Recovery (CalRecycle)
- Regional Council of Rural Counties (RCRC)
- Carpet America Recovery Effort (CARE)
- Post-Consumer Carpet Processors
  - Collectors and Sorters
  - Installers
- Material Recovery Facilities (MRFs)
- Transfer Stations
- Public and Private Landfill Owners
- Waste Haulers
- Retailers and Dealers
- Consumers



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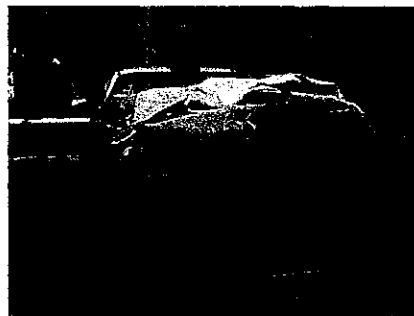
## Solid Waste System Flow Chart



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<http://www.calrecycle.ca.gov/central/WasteStream/BWSP/FlowChart.htm>

## Begin with the End In Mind



- The Goal
  - Get Used Carpet from Rural Communities to Carpet Recycling Facilities
  - What %age would be our target?



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## Definition of Rural Communities

- Population  
Less than 100,000 people
- Area
- Services
- Other?



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## California CARE Reclamation Partners



Company	Location
Bentley Prince Street	City of Industry, CA
Bentley Prince Street	West Sacramento, CA
Carpet Collectors	San Jose, CA
Carpet Collectors	Folsom, CA
Los Angeles Fibers Company	Los Angeles, CA
Quansing International, Inc.	Diamond Bar, CA
Packwork	San Jose, CA
Planet Recycling	San Diego, CA
REX Group	Fresno, CA
The Carpet Recyclers	Oakland, CA
The Carpet Recyclers - Southern California	Southern California, CA
California	

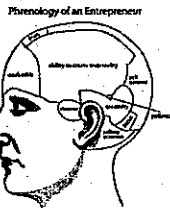


[www.carpetrecovery.org](http://www.carpetrecovery.org)

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## CARE Reclamation Partners

- Independent Business People
  - Entrepreneurs
- Market-Based Solutions
- Aggressive
- Innovative
- Sustainable Business Practices
- Invest to Grow Their Business



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## Services Provided

- Collection/Reclamation from Commercial Sites
- Collection from Residential Sites
- Sorting of Carpet by Polymer Type. Devices used are Infrared Technology Detectors.
  - Nylon 6
  - Nylon 6,6
  - Polypropylene
  - PET
  - Wool
  - Other
- Baling, and Labeling by Fiber Type
- Shipping to First-Line Processors
- Processing
  - Shredding
  - Shearing
  - Hammer milling
- Marketing/Selling processed material
  - Fiber
  - Carpet Filler
  - CAAF
  - Material for Waste-to-Energy
  - Landfilling Unusable Materials
  - Baling processed materials and labeling
  - Shipping to Manufacturer for End Products
  - Providing Certification Certificates to Customers
    - Used for LEED certification projects
  - Educating End Users and Consumers
    - Presentations
    - Articles

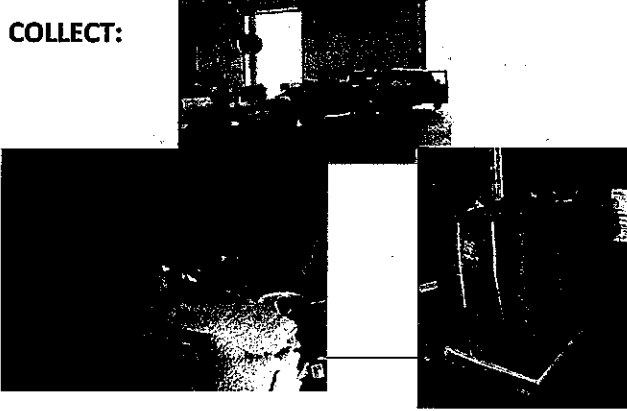


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## What does a Reclamation Partner do?

COLLECT:



## What does a Reclamation Partner do?

Identify and BALE:

Infrared Identifiers:



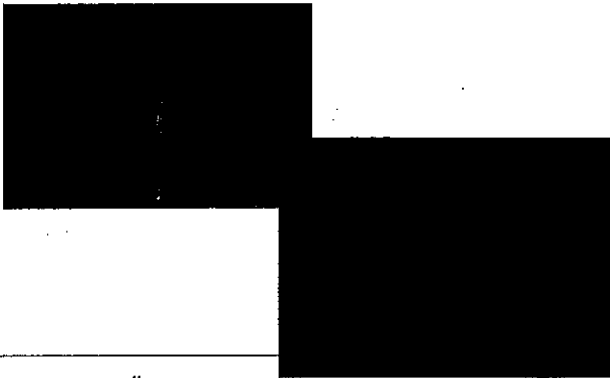
Vertical Baler:



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## Carpet & pad bales ready to ship



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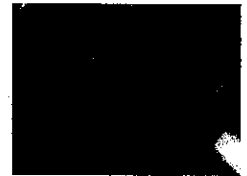
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## Processing Carpet

Sorted carpet being fed into shredder



"Fluff" from shredding



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## Where are carpet recycling processors in California?

- In California (both located in Southern California):
  - LA Fiber – Vernon California
    - Turns used carpet into carpet pad
  - The Carpet Recyclers – La Mirada CA
    - Harvests carpet fiber, separates and harvests components of carpet backing
- Both have a network of collection points where they drop empty trailers and swap out when full (usually at large carpet retailers or installers) or independent collectors collect/sort carpet and deliver to facilities.
- Exempted from CalRecycle MRF regulations as "recycling facilities" which requires carpet to be source segregated i.e. cannot be co-mingled with trash.



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## Outside California



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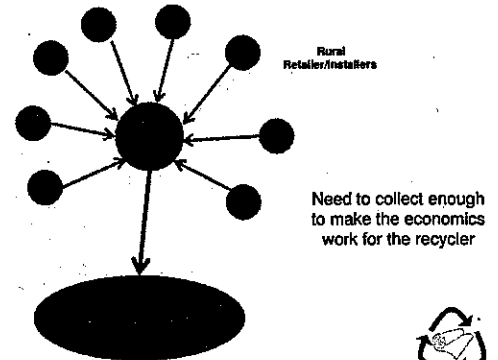
## How to get Collection Services to Rural Communities

- County/Regional Governments
  - Set Up Collection Points
  - Transport to Carpet Recyclers/Processors
- Attract First-Line Processor or Independent Collector to Locate
- Partner with Entrepreneurs



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## General Concept



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## How an Entrepreneur Evaluates the Opportunity



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## 1. What is the source of the carpet?

- Residential Carpet
  - Most of residential carpet goes to recycler from installer
- Commercial Carpet
  - Recycling part of bid process
  - Carpet Tile Companies 'Take Back'
  - Demolition/Renovation Companies
    - Most of their waste goes to the landfill



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## 2. How Much Carpet is Going to Rural Landfills?



## 3. What Strategies Could be Used to Collect Carpet?

- Carpet recycling processor dropping trailer at various types of locations
  - Note: To be cost-effective trailers need to fill up every 2 weeks (trailers 53' long and hold approximately 30,000 lbs or between 4200 - 7500 square yards of carpet)



At Local Carpet Stores

At Existing Recycling Facilities

(L.A.) Los Angeles Fibers

Source: *The Carpet Recyclers*, L.A. Fibers



### 3. What Strategies Could be Used to Collect Carpet?

- Carpet recycling processor dropping trailer at various types of locations
  - At a regional landfill or MRF (carpet would need to be brought in separately and not co-mingled with trash)
  - At regional government-owned operation e.g. E-Waste/Household Hazardous Waste collection centers



### 3. What Strategies Could be Used to Collect Carpet?

- Use Independent Collectors
  - Business Model works best with other recyclables
- County/Regional Government sets up Collection Center



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### One Size Will Not Fit All

- Different Solutions depending on:
  - Population
  - Logistics Issues
    - Transportation
  - Economics
    - Tipping Fees versus Disposal Fee
- Major Residential Players (Home Depot, Lowe's and Empire) are recycling their carpet waste
  - Approximately 25% of the total



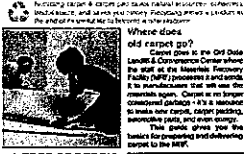
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### Consumer Education



<http://www.a.org/index.php/recycling/carpet-recycling>

## Consumer Education

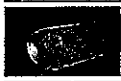


**1 FREE OF DEBRIS**  
Make sure that carpet and padding are clean, dry, and free of debris such as tack strips, nails, staples and other items. Call before to arrange the equipment needed to remove the debris.



**2 ROLL IT UP**

Roll up carpet and carpet pad separately. If possible, use the machine that the manufacturer has set up with the face that will be in your roll out.



**3 TIE THE ROLL**

Cut a strip of carpet from the edge of the roll about three feet long. Cut the strip along the middle of the roll. Pull the strip of carpet through the hole and wrap before to secure.



<http://dswsa.org/index.php/recycling/carpet-recycling>

### 4 GET WEIGHED

Take the rolls to the Old Dixie Hwy. Landfill & Convenience Center (see address below). First, visit the Scale House to have your vehicle weighed.



### 5 DROP IT OFF

Depending on the time of day, you will be directed to the Materials Recovery Facility or the All-in-One Center for Carpet and Carpet Pad.



### 6 DISPOSAL FEE

Receive a checkbook of 40% off the register price for as a thank you for participating in the post-consumer carpet program. Call the Scale House to find out more, see [dswsa.org](http://dswsa.org) for the complete fee.

#### Location & Hours:

Old Dixie Hwy Landfill & Convenience Center  
4189 Old Dixie Hwy, Dalton, GA 30721

Monday - Friday, 7:00 AM - 4:00 PM

Saturday, 7:00 AM - 3:00 PM

Get directions online by visiting the Department of Transportation's website at [www.dswsa.org](http://www.dswsa.org).

To learn more about recycling at Wildlife County visit [www.wildlife.org](http://www.wildlife.org) or call (706) 775-5000.

Call the Whitefield Solid Waste Authority  
P.O. Box 1200, Dalton, GA 30702-1200  
Recycling: 706-775-2111  
Kiosk Hours: 706-377-3388  
New Office: 706-377-3343  
[www.dswsa.org](http://www.dswsa.org)



## Summary

### ■ To move forward with a rural community carpet recycling program:

1. Define 'Rural'
2. Define the Opportunity
3. Set Up collection system that matches the needs of the Opportunity



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Questions? Comments?



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