



LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountyiswmtf.org

GAIL FARBER, CHAIR
MARGARET CLARK, VICE-CHAIR

November 28, 2013

Kathy Frevert
Department of Resources Recycling and Recovery
1001 I Street
Sacramento, CA 95812

Dear Ms. Frevert:

REVISED CARPET STEWARDSHIP PLAN

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on Carpet America Recovery Effort's (CARE) revised stewardship plan (Plan) submitted to CalRecycle on October 28, 2013. The Plan, if approved by CalRecycle, would be the governing document for the State's carpet stewardship program as required under AB 2398 (Perez, 2010). The Task Force is concerned with several elements of the Plan and requests that CalRecycle **not approve** it and require CARE to resubmit a revised Plan, which addresses the issues discussed below:

1. The Plan must provide adequate funding to ensure carpet can be cost effectively and conveniently collected and recycled throughout the State. It is troubling that several carpet recycling companies went out of business while CARE held onto substantial funds that were intended for carpet recycling. If there are no recyclers to accept carpet there is no market for it, and therefore, any carpet that is collected will be sent to disposal.
2. The Plan provides no incentive for local governments and contracted haulers other than those in rural areas to collect and haul carpet to processors and/or recyclers. Unused funds could be utilized to expand the rural collector incentive to CARE certified haulers and local governments in non-rural communities so that they will send the material to processors and recyclers. Under current conditions it is less expensive to send collected carpet to landfills. Therefore, incentives are needed to support carpet recycling.
3. Given the long term challenges in establishing markets for post-consumer carpet waste, CalRecycle should encourage the production of low-carbon fuels from non-recyclable carpet waste, thereby expanding markets for carpet waste, keeping this material out of landfills, and benefitting the environment.

4. Carpet collectors are unable to readily segregate recyclable carpets from unrecyclable carpet, which inhibits the productivity of their businesses. Technology exists in the form of infrared sensors that can identify carpet fiber within seconds. However, the sensors are cost-prohibitive and are thus not widely available to collectors. The Task Force recommends that CARE institute a requirement that manufacturers stamp or label carpets in order to easily identify the materials they are made from, which will boost the ability to separate and recycle different types of carpet.
5. The plan has a recycling goal of 16% for 2016 with an “aspirational goal” of 24% by 2020. These goals are extremely low considering the State’s 75% recycling goal prescribed in AB 341. Higher goals need to be set to align this plan with the State’s waste management goals as the bill originally intended.
6. More needs to be done to address the issue of increased use of recycled Polyethylene Terephthalate (PET) in new carpet. While the Plan does attempt to address this issue with the hiring of a PET Program Manager and a commitment to fund research grants at State universities, it simply falls short of addressing the difficulties with recycling PET carpet, which will account for 50% of the market by 2016. Fees collected for PET carpet should primarily be used for finding a solution to this pressing problem, which threatens the viability of the carpet recycling infrastructure in general.

The Task Force is concerned that the carpet program is doomed to fail if CARE does not quickly develop and implement creative market based solutions to these pressing issues. California needs a cost-effective and convenient carpet recycling program that works, and it can only do so if the program benefits all that pay into it as AB 2398 intended.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 939], as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated, cost-effective, and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

Kathy Frevert, CalRecycle
November 28, 2013
Page 3

If you have any questions, please contact Mr. Mike Mohajer of the Task Force at MikeMohajer@yahoo.com or (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste management Task Force and
Council Member, City of Rosemead

GA:ts

P:\epub\EnvAff\ENVIRO. AFFAIRS\TASK FORCE\Task Force\Letters\2013\Carpet Stewardship Plan Revision 11-28-13.doc

cc: Bob Peoples, CARE
Howard Levenson, CalRecycle
Heidi Sanborn, California Product Stewardship Council
Charles Boehmke, Los Angeles County Sanitation Districts
California State Association of Counties
League of California Cities, Los Angeles Division
Each member of the Los Angeles County Legislative Delegation
Each member of the Los Angeles County Board of Supervisors
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
San Fernando Valley Council of Governments
Gateway Cities Council of Governments
Westside Cities Council of Governments
Each City Mayor and City Manager in the County of Los Angeles
Each City Recycling Coordinator in Los Angeles County
Each Member of Los Angeles County Board of Supervisors
Each Member of the Los Angeles County Integrated Waste Management Task Force