



CALIFORNIA MATTRESS RECYCLING ADVISORY COMMITTEE

Helping to answer the question of what to do with that old mattress!

November 22, 2017

Mr. Howard Levenson
Deputy Director: Materials Management and Local Assistance
CalRecycle
1001 I Street - P.O. Box 4025
Sacramento, CA 95812-4025

Sent via eMail

Subject: Comments on Baseline and Goals

Mr. Levenson,

On behalf of the California Mattress Recycling Advisory Committee (Committee), I would like to thank you for the opportunity to comment on CalRecycle's upcoming setting of baseline amounts and recycling goals for California mattresses. In addition to the below recommendation from the Committee, individual committee members may have comments they share on an separate basis, specific to the part of the industry they represent or specific to their organization, and not representing the committee.

Contained within Attachment 2 of the documents available to the public from the CalRecycle website at <http://www.calrecycle.ca.gov/Actions/PublicNoticeDetail.aspx?id=2201&aiid=2010> , is the stated renovation goal of 150,000 unit per year and that goal is held at that same number for each subsequent year listed (2016 through 2020). The Committee recommends that number be removed from the listed goals, and a new number should not be set until better data becomes available.

Also as noted in Attachment 2, "2016 was the first reporting year for mattress renovators, recyclers, and solid waste facilities, and staff are continuing a number of education and outreach activities to reduce data gaps and improve data quality in subsequent reporting periods." Just as staff did not propose "utilizing the first-year actual reported data as the baseline to set a recycling rate," for the same reasons, staff should not set a number for renovation. Furthermore, subsequent planning should not use the 2016 renovation data when considering a baseline for renovation. The 150,000 figure was based on only 6 of 56 renovators reporting. Of the 3.842 million units sold in 2016 according to the MRC 2016 Annual Report, only 955,000 were recovered at MRC-reporting recyclers, according to report data. That leaves 2.737 million units unaccounted for as either disposal, renovation, or resale, but a significant amount of those units likely went to renovators.

Citing 150,000 as a realistic number for comparison purposes could disadvantage mattress renovators, and keeping the number steady at that rate seems contrary to the [waste management hierarchy](#), as specified in §40051 and §40196 of the [California Public Resources Code](#). Moving material up the hierarchy of waste management, from recycling to source reduction, is a one- step gain in resource conservation, and therefore as significant as moving items from landfill to recycling. This is the reason PRC § 42985(b) states that legal renovation is not to be undermined or adversely impacted.

Page 2 of 3

For the reasons stated above, the Committee recommends to CalRecycle that it not include the 150,000 unit per year data at this time until better data is available. Once more representative data is available, the setting of steadily increasing goals for renovation of used mattresses would be appropriate.

If you have any questions regarding any of the information provided above, please feel free to contact me or any of the Committee members.

Respectfully,

A handwritten signature in blue ink, appearing to read 'DK', is written over a faint, light blue circular stamp or watermark.

Doug Kobold
Committee Chair

Roles and Responsibilities of the Advisory Committee

Environmental Advocates

- Kelly McBee, Legislative and Policy Analyst, Californians Against Waste
- Heidi Sanborn, Executive Director, California Product Stewardship Council
(Chris Lester is currently substituting for Heidi Sanborn)

Solid waste industry

- Veronica Pardo, Regulatory Affairs Associate, California Refuse Recycling Council
- Curtis Michelini, Sr., President, Industrial Carting & Global Materials Recovery Systems

Local government

- David Goldstein, Recycling Market Development Zone Administrator, Ventura County
- Doug Kobold, Waste Management Program Manager, Sacramento County (**Chair**)
- Jo Zientek, Deputy Director, Environmental Services Dept., City of San José

Private representatives involved in the collection, processing, and recycling of used mattresses

- Don Franco, Jr., Vice President, Gateway Mattress Co., Inc.
- Terry McDonald, Executive Director, St. Vincent de Paul Society of Lane Co., Inc.
- Tchad Robinson, President, Blue Marble Materials

Other interested parties

- Sharron Bradley, CEO, North American Home Furnishings Association
(Lisa Casinger is currently substituting for Sharron Bradley)
- Mike Combest, Executive Vice President of Operations, The Sleep Train, Inc.