

Comment Code (ID)	Comment Period	Received From Name	Received From Affiliation	Received Date	Comment Type	Comment	Section	Comment Category	Response
15B-E-1	Second 15-Day	Ally Peck	Consumer Technology Services (CTA)	11/9/2023	Email	Are comments seriously due on THANKSGIVING?		Other	The comment period was extended to November 27, 2023.
15B-E-2	Second 15-Day	Joseph Reisdorf	Customized Data Management Solutions (MDM)	11/12/2023	Email	Our comments and questions are as follows: 18815.2 Definitions 10.5 Collection Method: The options for specifying the collection method are not clear. More examples or a list would be helpful.	18815.2(a)(10.5)	Collection Method	CalRecycle rejects this comment. The second 15-day comment period concerns only the changes made to the regulatory text in the second 15-day comment period. Because the relevant subsection for this comment was not modified in the second 15-day comment period, no response is required.
15B-E-2A	Second 15-Day	Joseph Reisdorf	Customized Data Management Solutions (MDM)	11/12/2023	Email	38.4 Mixed Plastic Waste: PRC Section 41781.4 lists polyethylene while the proposed regulatory section lists HDPE.	18815.2(a)(38.4)	Mixed Plastics Export	CalRecycle rejects this comment. The second 15-day comment period concerns only the changes made to the regulatory text in the second 15-day comment period. Because the relevant subsection, 18815.2(a)(38.4), for this comment was not modified in the second 15-day comment period, no response is required. Nevertheless, CalRecycle notes that, although PRC section 41781.4 refers to "polyethylene," section 41821.5(b)(4)(A) only identified mixed plastic waste consisting solely of resin numbers 1, 2, 5, or a combination of those resin types as those that could be exempt from the requirement that jurisdiction of origin be reported for exported mixed plastic waste. As such, the regulation excludes the resins corresponding to those numbers (respectively, polyethylene terephthalate, high-density polyethylene, and polypropylene) from the definition of "mixed plastic waste." Moreover, because low-density polyethylene (resin number 4) is rarely recycled, excluding it from the definition of "mixed plastic waste" is consistent with the Legislature's intent that plastic waste exports be considered disposal unless it comprises only plastics that are destined for recycling.
15B-E-2B	Second 15-Day	Joseph Reisdorf	Customized Data Management Solutions (MDM)	11/12/2023	Email	PRC Section 41781.4 also includes the phrase "...and the export is destined for separate recycling of each material." Is the elimination of this phrase from the regulation text a material difference?	18815.2(a)(25.5)	Mixed Plastics Export	CalRecycle rejects this comment. The second 15-day comment period concerns only the changes made to the regulatory text in the second 15-day comment period. Because the relevant subsection for this comment was not modified in the second 15-day comment period, no response is required. However, CalRecycle notes that the omitted phrase is included by reference in the definition of "export," which states that export has the same meaning as PRC 41781.4.
15B-E-2C	Second 15-Day	Joseph Reisdorf	Customized Data Management Solutions (MDM)	11/12/2023	Email	18815.3(n)(5) Discrepancies: What criteria does CalRecycle use to identify a discrepancy? The proposed regulatory text does not allow for the reporting entity to provide an explanation for the apparent discrepancy, unless such an option is implied by the phrase "resolve the discrepancy". If so, it would be useful to expand the regulatory text to so indicate.	18815.3(n)(5)	Registration and/or Reporting	CalRecycle rejects this comment. The second 15-day comment period concerns only the changes made to the regulatory text in the second 15-day comment period. Because the relevant subsection for this comment was not modified in the second 15-day comment period, no response is required.
15B-E-2D	Second 15-Day	Joseph Reisdorf	Customized Data Management Solutions (MDM)	11/12/2023	Email	18815.4(d)(3) Reporting for Haulers, Mixed Plastic Waste: The regulations and PRC include a single definition for "Mixed Plastic Waste". For reporting purposes in this section, what material types should be used? Also will CalRecycle provide a list of destination regions that should be used when filing reports?	18815.4(d)(3)	Mixed Plastics Export	CalRecycle rejects this comment. The current comment period only concerns the current changes to the regulatory text. Because this comment does not address any such changes, no response is required. Nevertheless, CalRecycle notes that material type reporting for contract haulers reporting exported mixed plastic waste is described in 18815.9(a)(1)(D)(ii), which refers readers to 18815.9(a)(2) (for materials not expressly addressed in clause (i)). Destination regions are defined in 18815.2(a)(k)(1).
15B-E-2E	Second 15-Day	Joseph Reisdorf	Customized Data Management Solutions (MDM)	11/12/2023	Email	Is the information reported for each origin jurisdiction to be the total of mixed plastic waste from that origin that was exported, and not segregated by material type and destination region?	18815.9(i)(8.5)	Mixed Plastics Export	CalRecycle rejects this comment. The second 15-day comment period concerns only the changes made to the regulatory text in the second 15-day comment period. Because the relevant subsection for this comment was not modified in the second 15-day comment period, no response is required. However, CalRecycle notes that, for exported mixed plastic waste, the jurisdiction of origin will be reported summed across material types and destination regions. For example, if 100 tons plastic #6 were exported to Malaysia and 100 tons plastic #7 were exported to Thailand, then the origins would be reported for the 200 tons exported in total (e.g., 50 tons from Sacramento, 75 tons from Roseville, and 75 tons from San Francisco). RDRS will not require users to enter separate origins for each material type and destination region.
15B-E-2F	Second 15-Day	Joseph Reisdorf	Customized Data Management Solutions (MDM)	11/12/2023	Email	18815.9(i): Identifying Collection Method: This section requires more details and examples to clarify how collection methods are to be designated and determined. Thank you.	18815.9(i)	Collection Method	CalRecycle rejects this comment. The second 15-day comment period concerns only the changes made to the regulatory text in the second 15-day comment period. Because the relevant subsection for this comment was not modified in the second 15-day comment period, no response is required.
15B-E-3	Second 15-Day	Michael Caserio	Republic Services	11/17/2023	Email	We appreciate the opportunity to review the second 15-day changes to the RDRS proposed rules. Our company was pleased that CalRecycle addressed the issues brought forth in our March 2023 correspondence. We believe the changes relative to our prior concerns were constructive and will allow our operations to safely and efficiently process our customers through the facilities while still meeting the majority of the information needs sought by your agency. As provide examples of how reporting may be different in the future for various types of materials and customers. The existing regulations are detailed in nature and the proposed changes may add a layer of complexity that could lead to confusion over what type of information is sought and how to report it. A moderate investment of time in organizing these events may save a fair amount of staff time post-implementation. Consistency of reporting methods has always been a critical goal of the platform and a session or two on future expectations would be helpful to all involved.		Comment in Support	No response is required because the comment does not suggest any specific changes to the proposed regulations or raise issues related to the rulemaking process.
15B-E-3A	Second 15-Day	Michael Caserio	Republic Services	11/17/2023	Email	Thank you again for the opportunity to participate in the process and we will look forward to any opportunities for sharing of additional information relative to the implementation of the revised regulations.		Registration and/or Reporting	CalRecycle rejects this comment. No response is required because the comment does not suggest any specific changes to the proposed regulations or raise issues related to the rulemaking process.
15B-E-3B	Second 15-Day	Michael Caserio	Republic Services	11/17/2023	Email	Regards.		Other	CalRecycle rejects this comment. No response is required because the comment does not suggest any specific changes to the proposed regulations or raise issues related to the rulemaking process.