

ATTACHMENT



December 16, 2019

TO: California Waste Solutions and GreenTeam of San Jose
VIA: email
RE: Recycle Plus Program RRFS List Amendment Request

Thank you for collaborating to bring forward the joint request to amend the Residential Recyclables for Studies ("RRFS") List. We appreciate the time you have invested in this process, which has provided us the opportunity to understand your shared concerns about current market conditions for recyclables.

In addition to your request on November 1 to remove Textiles, Polystyrene, and Film Plastic from the RRFS List, we appreciated your clarification on December 11 that clean and clear Film Plastic should still be considered to have an available market, and therefore remain on the RRFS List.

To evaluate your request to amend the RRFS List, we reviewed the data and information that you enclosed, including correspondence from vendors and key partners, the limited-to-zero quantity of tons of material under consideration that your companies have been able to market, and pricing trends indicating that there are not currently viable markets for Textiles and Polystyrene collected in a commingled recyclables cart and processed at a Material Recovery Facility (MRF). We also reached out to other local MRFs and jurisdictions to survey their handling and marketing of the material under consideration, and we received similar feedback from all that there are not currently markets for Textiles and Polystyrene collected in a curbside program (see attachment "Information on RRFS Materials").

The City approves amending the RRFS List as follows:

- Bagged Textiles - removed
- Loose Textiles - removed
- Polystyrene - removed
- Plastic Bags and Other Film - updated: clean and clear material only

This amended RRFS List (attached) will be effective for studies conducted during the period of January 1, 2020 through December 31, 2021. These studies include:

- Characterizations of MRF residue, related to Material Recovery Standard ("MRS"); and
- Characterizations of material collected in single-family recycling carts, related to determining future pricing tier for single-family recycling services.

As a reminder, the RRFS list only corresponds to the above-mentioned studies; the list is independent from what is acceptable in the recyclables cart, as well as your contractual obligations to process collected material to market specifications and to sell material for its highest and best use. Additionally, per the established calculations of the MRS, marketing of the removed RRFS items will not affect the adjustment factor of Non-Program Materials sold.



We appreciate the emphasis in your request that regardless if the materials under consideration are removed from the RRFS List, your companies will do everything possible to maximize landfill diversion should markets become available again in the future.

Thank you again for your collaborative efforts to bring forward for the City's consideration the joint request to amend the RRFS List. As always, we are appreciative of your continued commitment to providing excellent service to our residents.

Please contact Valerie Osmond at (408) 535-8557 or Valerie.Osmond@sanjoseca.gov with questions.

Thank you,

Kerrie Romanow
Director, Environmental Services Department

Attachments:

Amended RRFS List (effective 1/1/2020 – 12/31/2021)
Information on RRFS Materials

Attachment: Amended RRFS List

RRFS List (effective 1/1/2020 – 12/31/2021)	
<u>Recyclable Paper</u>	
1. Clean Newspaper	
2. Clean OCC	
3. Clean Mixed Paper	
4. Clean Aseptic and Polycoated Packaging	
<i>Note: "Clean" recyclable paper is defined as material not soiled or contaminated that could reasonably be expected to be recycled without special processing or cleaning. This category does not include Remainder/Composite Paper.</i>	
<u>Recyclable Plastic</u>	
5. #1 PET Bottles and Containers	
6. #2 HDPE Bottles and Containers	
7. #3, #4, #5 and #7 Bottles and Containers	
8. Plastic Bags and Other Film: clean and clear only	
9. Polystyrene	
10. Durable Plastic Items	
<i>Note: Does not include Remainder/Composite Plastic.</i>	
<u>Recyclable Metal</u>	
11. Aluminum Beverage Cans	
12. Aluminum Foil	
13. Steel (Tin) Cans	
14. Other Scrap Metal	
<i>Note: Does not include Remainder/Composite Metal.</i>	
<u>Recyclable Glass</u>	
15. Recyclable Glass	
<i>Note: Does not include Remainder/Composite Glass.</i>	
<u>Recyclable Textiles</u>	
16. Bagged Textiles	
17. Loose Textiles	

Attachment: Information on RRFS Materials

Information Submitted by Recycle Plus Contractors

	Film Plastics	Polystyrene	Textiles
RP contractors able to market item in past year?	Only clear & clean	No	Minimal
Buyers/Brokers Communications	No interest in mixed film; markets for clean & clear	No markets, no interest in material from MRFs	Markets flooded with clean, high quality; no interest in textiles from MRFs
Diversion Plan	Most of material landfilled; will divert if markets emerge	Material landfilled; will divert if markets emerge	Most of material landfilled; will divert if markets emerge

Additional Information Obtained by City

	Film Plastic	Polystyrene	Textiles
Accepted in Other Local Programs?	<u>Accepted</u> in most local recycling programs.	<u>Not accepted</u> in any other local recycling programs	<u>Not accepted</u> in most local recycling programs
Reports from Other Local MRFs (SSF Scavenging, SBWMA, SMarT Station, BLT)	Not generally marketed. Limited markets for clear, clean film.	Not currently marketed. Residential materials not clean enough to recycle.	Not generally marketed. Difficult to collect and process in a manner that keeps material clean enough to recycle.
Industry News	<ul style="list-style-type: none"> New facilities in Texas, California, Nevada & Mexico that will recycle film plastics opening by 2020. May be sourcing from CA, however, some may be limited to pre-consumer sources. CA law requires increased post-consumer content in bags, should boost market demand 	<ul style="list-style-type: none"> Clean blocks of foam recyclable; usually sourced from pre-consumer operations (not from residential sources) 	<ul style="list-style-type: none"> Clean textiles resold in US or sold in bulk to brokers for international markets. Current glut of materials.