



Brian G. McPheeley
Pratt Industries, Inc.
Chief Executive Officer
bmcpheely@prattindustries.com

Via Email - mayor@houstontx.gov

Mayor Annise Parker
City of Houston
900 Bagby St.
Houston, TX 77002

Dear Mayor Parker:

I am writing you on behalf of my company, Pratt Industries, as well as, all the members of the Paper Recycling Coalition (PRC), to respectfully request that you delay any consideration of the “one-bin-for-all collection system” recycling proposal.

The members of the PRC are leaders in recycling. We are true recyclers - the companies that take old materials and use them to make new products. Through residential, commercial and industrial paper collection programs at paper mills and manufacturing facilities in Texas and throughout the United States, we manufacture 100% recycled paper that is turned into a wide array of products. From cereal boxes and mailing tubes to book covers, game boards, puzzles and corrugated containers, these 100% recycled paper products are a part of our everyday lives.

The PRC has approximately 400 facilities in 42 states, representing over 50,000 jobs with benefits, that we are intent on keeping in this country. In Texas we have 15 facilities, including 2 in Houston, employing 1,400 workers in well-paid jobs.

One of the most critical issues facing the 100% recycled paper industry is the availability of clean, economically viable fiber for domestic producers.

According to EPA: “Recycling is the process of collecting and processing materials that would otherwise be thrown away as trash and turning them into new products.” However, recycling as we know it is under assault. We are hearing more and more about what is being touted as “a new trash collection process” at material recovery facilities (MRFs) called mixed waste processing (MWP), one bin systems or in our terminology, ‘Dirty MRFs’. This is being promoted as the answer to the problem of low recycling rates and the increasingly high costs of source separation disposal.

MWP is a one-bin system where all trash and recyclables are placed together with no prior separation. This material is then sent to a MRF to generate recyclable materials through a combination of labor-intensive manual and mechanical sorting.

We understand that the percentage of residuals from a properly operated clean MRF, supported by an effective public outreach and education program, should not exceed 10% by weight of the total delivered stream. That is a recovery rate of 90-95%. On the other hand, a Dirty MRF only recovers between 5% and

45% of the incoming material as recyclables, with the remaining 55%-95% going to a landfill or other disposal, such as a mass burn facility.

A recent report by the Houston Zero Waste Coalition identified a number of Dirty MRFs around the country with recycling rates from 6%-15%, although diversion rates are claimed that are significantly higher. In most cases, these so-called diversion rates include materials that are processed in anaerobic digestion, used as daily landfill cover or incinerated. Obviously, paper is a large portion of materials deemed “unrecoverable” in Dirty MRFs.

The PRC strongly opposes Dirty MRFs and urges your consideration of our concerns. The following statement was recently issued by PRC member David W. Scheible, the Chairman and CEO of Graphic Packaging Holding Company:

“The recycled paper industry, and tens of thousands of good paying jobs, is wholly dependent on a clean supply of recovered fiber. This approach will do nothing to help get us more paper into the system. Without that, the products we produce will go away and either be made overseas or from non-recycled materials. The ‘Dirty MRF’ system yields only minimal amounts of recyclable material, and much of what it does yield is often too contaminated to use. I am strongly opposed to this new modern approach to go back 20 years. Making boxes out of recycled paper that has been exposed to all types of consumer waste is simply not a good idea for a number of reasons. In addition, no one should think that they are recycling, if the material is burned. Burning our materials is not recycling. Recycling is the process of collecting and processing materials that would otherwise be land filled and turning them into new products, over and over again. Recycling is an essential part of the American economy and there is no reason to return to the ‘Mad Men’ era of throwing everything away.”

Thank you for your consideration of our concerns.

Sincerely,



Brian McPheeley

And, on behalf of members of the Paper Recycling Coalition:

David Scheible, President & CEO, Graphic Packaging International
Mike Kiepura, President of Consumer Packaging, RockTenn
Bud Newman, CEO, Newman Paperboard
Pete Trager, CEO, White Pigeon Paper Company
Marc-Andre Depin, President & CEO, Norampac, a division of Cascades Canada Inc.
Joel Laroche, COO, Fusion Paperboard
Kevin Kwilinski, President & CEO, PaperWorks
Matt Kaplan, President, COO & Director, KapStone
Kevin Hayward, President, OX Paperboard

BM/lab

cc: Governor Rick Perry



July 2, 2014

Mayor Annise Parker
City of Houston
900 Bagby Street
Houston, TX 77002

Dear Mayor Parker:

The Steel Recycling Institute (a business unit of the American Iron and Steel Institute) is very concerned that the City of Houston, TX and the City of Indianapolis, IN are contemplating adoption of a Mixed Waste Material Recovery Facility in place of existing curbside recycling programs. Our position is based upon the following:

The stream of used steel cans in this Mixed Waste Material Recovery Facility collection mode would produce unacceptable levels of contamination. Steel mills are very forgiving of paper labels on steel cans and even a very light film of residue for steel cans from curbside programs, but steel mills cannot accept bales of steel cans that would have entrapped tramp residue, including glass, aluminum, paper, and all plastics. Moreover, heavy contamination from foodstuffs, diapers, and other putrescible items would be unacceptable.

The Institute of Scrap Recycling Industries publication lists steel can bundles on page 18 of its *Scrap Specifications Circular 2013* which reads:

Sec. 213 Steel can bundles

Steel can scrap compressed to charging box size and weighing not less than 75 pounds per cubic foot. Cans may be baled without removal of paper labels, but free of other non-metallics. May include up to 5 gallon tin coated containers.

Furthermore, the proposed Mixed Waste Material Recovery Facility would also pick up miscellaneous ferrous scrap (sections, joists, sheet metal, automobile parts, etc.) which would also be magnetically separated and mixed in with the steel can bundles, producing a variety of steel chemistries which would alter the consistent metallurgy of steel can bundles in the recycling marketplace, which purchasers expect.

The Steel Recycling Institute is dedicated to communicating the sustainable efforts of the North American steel industry. The SRI educates the solid waste industry, government, business, and ultimately the consumer about the benefits of steel's recycling accomplishments and advancements in sustainability. For more information on the steel's sustainability visit: www.recycle-steel.org or www.sustainable-steel.org. Or follow the SRI on Twitter@EnviroMetal.

680 Andersen Drive

Pittsburgh PA

15220-2700

412.922.2772

fax 412.922.3213

www.recycle-steel.org

Sincerely,

A handwritten signature in black ink that reads "Gregory L. Crawford". The signature is fluid and cursive, with "Gregory" and "L." being more formal and "Crawford" being more cursive.

Gregory L. Crawford
Executive Director





ISRI

Voice of the Recycling Industry

**Institute of
Scrap Recycling
Industries, Inc.**

Recyclers Announce Policy Opposing One-Bin Collection

Commingling collection decreases quantity and quality of recyclables

(Washington) – At its Summer Board of Directors Meeting, the Institute of Scrap Recycling Industries (ISRI), *the Voice of the Recycling Industry™*, adopted a policy in favor of separating recyclables from waste prior to collection as opposed to commingling or one-bin collection. Sorting before collection ensures that recyclable materials, particularly paper, are not unnecessarily contaminated and degraded.

“One-bin collection jeopardizes the quality of recyclables by mixing them with liquids, food, chemicals and other waste thereby lowering, and in many cases all-together destroying their value,” said Robin Wiener, president of ISRI. “Materials that are all together destroyed will be diverted to landfills or incinerators lowering recycling rates and damaging the environment. Simply put, one-bin collection is not good for recycling.”

The policy states, “ISRI supports the collection and sortation of recyclable materials in a manner that optimizes the value and utilization of the material as specification grade commodities to be used as feedstock to manufacture new products.

“Since the quality of the recyclables as specification grade commodities is essential, ISRI opposes the commingling of recyclables with solid waste or mixed waste processing in one-bin system where all solid waste and recyclables are placed together with no separation prior to recycling.”

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The Institute of Scrap Recycling Industries, Inc. (ISRI)

ISRI is the Voice of the Recycling Industry™. ISRI represents more than 1,600 companies in 21 chapters nationwide that process, broker and industrially consume scrap commodities, including metals, paper, plastics, glass, rubber, electronics and textiles. With headquarters in Washington, DC, ISRI provides safety, education, advocacy, and compliance training, and promotes public awareness of the vital role recycling plays in the U.S. economy, global trade, the environment and sustainable development. For more information about ISRI, visit www.ISRI.org.



April 4, 2014

Mayor Annise Parker
Council member Dwight Boykins
Council member Ellen Cohen
Council member Brenda Stardig
Council member Stephen Costello
Council member David Robinson
Council member Michael Kubosh
Council member C.O. Bradford
Council member Jack Christie
900 Bagby St.
Houston, TX 77002

Dear Mayor and Council members:

Strategic Materials, Inc. (SMI) is a leading North American recycling company, with facilities located across the United States, Canada, and Mexico. Headquartered in Houston (Park Ten), we are the largest recycled glass processor on the continent and the recipient of glass currently coming from the City of Houston recycling programs. We have glass processing plants in Houston (825 S Loop West) and Midlothian, Texas. I am writing today to voice SMI's opposition to the "One Bin for All" proposal. Houstonians have shown that given the chance they are willing and able to separate recyclable material from trash. Below is our reasoning for this position:

- We believe this facility will be classified as a municipal solid waste facility under TCEQ rules and therefore commodities separated at this facility could also be considered MSW. Recyclers and secondary processors that handle this material may need to modify or reclassify permits, operations, etc. as a result of receiving material from this facility.
- Materials coming from single-stream are already under intense scrutiny by commodity buyers from a quality standpoint. Materials coming from this facility are likely to have even higher amounts of contaminants, especially putrescibles that will make it even more difficult to market and sell these materials. It is likely that glass won't be recovered at all.
- The number one goal of any recycling program should be to provide quality products at predictable quantities to industries that use them as feedstock in making new products. Based on what we see and have read, the goal of this program is to divert 75% of the waste stream from the landfill. How will the City measure success – in terms of diversion rates (the number of tons diverted from the landfill) or true recycling rates (the number of tons that are actually recycled into new products)? Diversion is not recycling.
- This project does nothing to encourage residents to think differently about their trash and how they might reduce the amount of waste they generate. It will only make worse the "out of sight" mindset and encourage consumption. The City will have no incentive to reduce the amount of material it collects.

As an alternative, the City's current recycling services should be extended to every household in the City. In addition, programs for apartments, businesses and public spaces should be developed. A number of NGOs have benchmarked other cities around the country and have identified best practices that Houston could implement to increase the recycling rate. These include mandatory recycling, disposal bans, and Pay as You Throw (unit-based pricing). These have proven to be effective and efficient techniques to recover a significant amount of material for reuse and recycling. Go to http://www.ameripen.org/wp-content/uploads/100_Cities_Summary-09.30.13.pdf for more information.

Other Cities in Texas and around the world have passed "Zero Waste Plans" with the goal of reducing waste and incentivizing recycling and sustainable product design. The City of Houston should consider such an option as a way to increase waste reduction and recycling.

After all these efforts then and only then should a mixed waste processing facility of this type be implemented - to recover the last bit of recyclables that may have made their way into the waste stream.

As a Houston resident (District C) I am personally opposed to this plan as well.

Thank you for the opportunity to comment on the One Bin for All Project. Please feel free to contact me if you have any questions. I can be reached at rabramowitz@strategicmaterials.com or at 281-647-2774.

Sincerely,

Richard M Abramowitz
Vice President of Government Affairs

Teamsters Joint Council No. 58

4303 North Sam Houston Parkway East • Houston, Texas 77032 • Phone (281)560-2000 • Fax (281)560-2001



JOSEPHINE V. LOPEZ
VICE PRESIDENT

ROBERT CLEVER
TRUSTEE

ROBERT MELE, PRESIDENT

LETICIA ACOSTA
SECRETARY-TREASURER

ROBERT DELEON
TRUSTEE

DOMINIC FIERRO
RECORDING SECRETARY

M. DALE STANFORD
TRUSTEE

October 23, 2014

Mayor Annise D. Parker
P.O. Box 1562
Houston, TX 77251

Dear Mayor Parker:

On behalf of the Teamsters Joint Council 58, I am writing to express my concern about Houston's "One Bin For All" proposal. Houston's plan to commingle all waste, recyclables, and compostables and to construct and process all waste in a so called "total materials recovery facility" – or what the over 30,000 Teamster members employed in the waste industry-- would recognize as a Dirty MRF - will limit job creation, contaminate the city's valuable recycling stream, and incentivize the incineration of garbage that could have been recycled or composted. Don't let Houston rush into building an unproven, costly Dirty MRF. A true recycling program saves money, grows jobs, and protects the health of our community and the environment.

Mixing waste streams, as Houston's "One Bin for All" program proposes, however, contaminates and degrades recyclables, decreasing the sellable amount and diminishing their value on the market. This process undermines diversion goals and pushes more and more recyclable material into incinerators and landfills. Furthermore, incinerators and gasification plants require a great amount of carbon-based material to operate effectively, materials that should be recycled and composted. The residents of Houston deserve better.

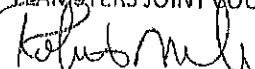
Recycling (separated at source from putrescible waste) not only conserves valuable resources, it is also a proven job creator. Recycling creates six to ten times the number of jobs than incinerators or landfills, and holds the potential to create 1.5 million jobs nationwide. This robust job creation opportunity relies on diverting materials from landfills and incinerators. A policy focused on source separation and increased diversion will generate jobs for Houston residents and reduce greenhouse gas emissions and pollution in our communities.

Educating and involving residents can increase recycling rates and create jobs. Houston should engage its residents and expand its recycling program – not take a step backwards by limiting it to one bin.

The Teamsters look forward to working with you, the Houston City Council, and the community for a solution that creates good, local, union jobs in resource recovery.

Regards,

TEAMSTERS JOINT COUNCIL 58



Robert Mele
President



November 12, 2014

The Honorable Mayor Annise Parker
City of Houston
900 Bagby
Houston, Texas 77002

Dear Mayor Parker:

I am writing to you on behalf of my company, Nature's Way Resources, in regards to the "one bin for all" collection system proposal. I have served on the Solid Waste division of the HGAC (Houston-Galveston Area Council) for over 15 years representing the composting industry. I have also served on the Compost Advisory Council for the State of Texas, and I am a licensed soil scientist in Texas. My company has provided recycling services for organic waste via composting to the Houston area for 20 years.

I am concerned about the harm to the environment that a Single Stream recycling will cause because there is a major environmental risk factor not mentioned in the information I have seen.

Back in the early 1990's, when I was researching information to start my business, I remember reading several reports on this type of recycling done in Europe in the 1970's and 1980's. It was an environmental disaster, as there were many problems with the organic residuals for composting after separation:

- 1) The first problem occurs when waste is collected by compactor trucks where the material is squeezed under high pressure so more material can be transported per trip. This act of compaction crushes many materials from light bulbs, fluorescent tubes, batteries, electrical circuits, plastic parts, glass, etc. releasing many small fragments. These small pieces get mixed with any organic waste present.

2) When organic materials are placed in bags or bins for collection, it is an anaerobic (without oxygen) environment. The organic materials immediately start breaking down by microbial action creating weak organic acids. These acids dissolve many toxic substances in the waste fragments above. This could be cadmium from batteries, tungsten or mercury from light bulbs, lead, pcb's, etc. and it ends up in the liquids and organic matter. When the organic material is composted, there is a large volume reduction, concentrating the toxic substances.

The biggest market for compost is the organic sector of horticulture and agriculture. The compost produced from a Single Stream recycling would not meet the standards for organic production and would have little market value. When the compost was applied to agricultural fields, the plants absorbed the toxic substances and heavy metals and it entered the food supply creating health problems.

3) Small bits of plastic, metal, glass, styrofoam, etc. ended up in the organic fraction of the waste as they could not be removed (at least economically). As the material was composted, the concentration of these contaminants increased as the material decomposed and decreased in volume. When applied to agricultural fields, they would build up in the soil. The plastic, due to its lower density, would eventually float to the top of the soil where it would blow and change the reflective character of the field and thus greatly diminished the yields. The toxic chemical residues changed the fertility of the soil (nutrient imbalances) resulting in crop failure, in addition to the absorption of heavy metals and toxic chemicals. There was also increased pollution of waterways from the agricultural runoff. Thousands of acres of grape vineyards were destroyed in France alone.

4) Additionally, there were other types of toxic materials that were found in the compost that was produced, from fragrances (soaps and cleaners), pesticides and herbicides, PCB's, dioxins, synthetic fibers from dryer lint, etc.

5) I have heard that one of the economic assumptions being used by the Single Stream proponents is that composters will pay the City for the organic fraction. I believe that this is a false assumption. Most of the yard and organic waste around the country is still going to landfills where waste generators pay a \$25-100 per ton dump rate (\$8-30 per cubic yard). We currently charge \$3.50 per cubic yard for

bagged material (grass and leaves) mixed with small branches and limbs and \$4.50 per cubic yard for food waste and larger woody material. When bags are used (biodegradable or not), it has been our experience that people place aluminum cans, plastic pots and other non-compostables in it. These have to be manually removed before processing to produce a good compost product.

Not only would I not pay for the contaminated organics from a Single Stream program, I would not accept it at all as a feedstock to make compost.

6) Due to this region's low landfill rates, most of an organic recycler's revenue has to come from product sales. The compost produced from a Single Stream collection would be of such a low quality that it would destroy the market for all compost products.

7) Other cities in the United States have achieved high recycling rates and have proven that there is no need for Single Stream Recycling.

Over the last few years there have been numerous articles published in the trade magazine BioCycle on how other cities are achieving very high recycling rates using source separation. The source separated recycling of organics creates many jobs and adds to the tax base of our communities. Clean feedstocks allow companies to produce a quality compost that will help solve many of the areas environmental problems.

Sincerely,

A handwritten signature in blue ink that reads "John C. Ferguson". The signature is fluid and cursive, with "John" and "C." stacked above "Ferguson".

John. C. Ferguson, M.S., P.G.

President