



CARE PROTOCOL

CARE Public Drop-off Site (DoS) Selection and Load Routing

Date: April 1, 2021

Purpose

The purpose of this document is to describe the approach and decision-making protocol that CARE CA staff use when 1) establishing a new Public Drop-Off Site and 2) directing Post-Consumer Carpet (PCC) loads to a CARE Collector/Sorter (aka, CSE).

Introduction

Consistent with CARE's approved 2018-2022 Plan ("The Plan") and the Carpet Stewardship Law, CARE's goal is to work with the CSE community to grow the total collection of PCC by facilitating and enabling expanded recycling opportunities. CARE has established numerous Public Drop-Off Sites (DoS) throughout California. These sites, primarily permitted solid waste/recycling facilities, are independently operated, with varying rates for drop-off fees, and provide access for flooring professionals, contractors, and the public to deposit PCC. The collected PCC is then routed to a CARE designated Collector/Sorter (CSE) for identification, sorting and subsequent processing to be incorporated into the recycled materials stream. Ultimately each recycler has primary responsibility to secure the needed volume to sustain and grow their operations. CARE's role is to enable, facilitate, support (both financially and logistically) and assist in a way that is seen as fair and maximizes the efficacy of the use of public funds.

How is CARE making Public Drop-off Site (DoS) location decisions?

CARE takes into consideration multiple elements when deciding to establish a public DoS. CARE endeavors to recruit sites in areas that are not adequately serviced by private business or waste management entities, being careful not to infringe upon existing CSE relationships.

Choosing the location for a CARE DoS is based on the review and consideration of varying factors, including the following:

1) Convenient Collections

- a) One important key focus is CARE's Convenient Collection goals. CARE, as part of their Convenient Collection objectives and Plan commitments, has stated:

- i) A minimum of one (1) CARE DoS per county, and
- ii) coverage for density of at least one (1) CARE DoS per 500,000 people.

2) Proximity to Flooring Professionals

- a) CARE endeavors to evaluate possible locations for a public access DoS in relation to where flooring retailers/professionals are located.
 - i) Based upon an independent Convenient Collection Study and survey of flooring professionals, the majority of tear-out PCC is handled by flooring professionals/contractors.
 - ii) Strategic proximity to retailers/flooring professionals, which serves as proxy for population density, presents the most ideal opportunity for capturing a larger and/or growing volume of PCC.

3) Location Type

Following are the types of locations pursued for a DoS:

- a) Public access solid waste facilities (e.g., transfer station, landfill) or recycling facilities (e.g., Construction & Demolition debris/C&D recycling facility sorting multiple streams, Materials Recovery Facility/MRF, facility accepting various recycling streams or other EPR materials, larger CRV buyback recycling facility).
- b) Supply Houses for flooring professionals – creating convenience for independent installers.
- c) Mill Regional Distribution Centers (RDC) – creating convenience for retailers/dealers and related flooring contractors. These are large warehouse facilities from which flooring professionals pick up their will-call flooring (soft and hard surface) materials.
- d) Flooring Retailers that may have space and a willingness to accept PCC from surrounding-area flooring professionals and the public. Generally, only in underserved areas and in close partnership with an area CSE.
- e) Other locations (uncommon) may include large complexes such as Universities, Convention Centers, etc. These locations may be set up as a temporary location and may have limited or restricted public access.

How does CARE decide which DoS loads go where?

Determining the destination for a CARE DoS PCC load is based on the review and consideration of many factors and may include some or all of the following:

- Regional proximity – distance, transportation routes, and weather conditions. Environmental considerations (GHG emissions) are also of importance, although not quantified.
- CSE operational capacity – capability of receiving a particular type of vehicle load (e.g., Trailers, Sidelifter, Cargo Containers, Walking Floor Trailers, Roll-off Bins).
- CSE receiving hours – hauler and DoS service convenience, ease of load receiving, wait-time and unloading constraints.

- Overall economics – cost to transport, recycling/tipping fee, additional wait-time costs, overnighting costs.
- Historical relationship – consideration of current business relationships, vendor experiences and service levels provided.
- Ability to handle all different types of carpet and quantities needed to meet production needs.
- Fairness and Equity – it is in CARE’s best interest to help California build a strong, healthy, and equitable carpet recycling collection infrastructure. CARE endeavors to work closely with the recycling community to enable business and thus, Program success.
- Consideration of any pilot program(s) that may be operating.

Changes in Routing Assignments

Potential re-Routing DoS loads: Based upon the above noted evaluation measures, re-routing rarely happens. However, CARE may, at its discretion, change DoS load routing assignments to meet the needs of Program Goals. Just as the siting of CARE DoS locations are not intended to interrupt or damage the CSEs Private Collection Network, PCC from CARE DoS locations is not intended to replace each CSE’s responsibility to garner the PCC needed to meet their capacity and materials demand needs. In an effort to build and support a strong, healthy, and equitable carpet recycling collection infrastructure, CARE assesses the above considerations prior to re-routing DoS PCC to a different CSE destination.

While CARE is not contractually obligated to provide notice and CARE does not guarantee PCC material volumes, CARE understands that CSEs make business decisions based upon flows/volume of PCC load receiving schedules and related volumes (e.g., staffing, equipment leasing/acquisition). CARE works to be respectful of our CSE’s business planning/scheduling needs by utilizing the following protocol to notify CSEs of any permanent routing changes:

- At minimum, CARE provides a 30-day professional courtesy notice on any changes to assignments; however, a 60-day advance courtesy notice is preferred.

Why might re-routing happen?

- Major service and/or schedule impacts.
- Scheduling challenges – receiving CSE regularly pushing out receiving time windows, long wait times at CSE.
- Transportation route challenges – oftentimes weather/seasonal (temporary re-routing), construction, persistent delays.

- For emergency purposes, temporary schedule re-balancing or factors beyond CARE's control (e.g., weather, traffic, construction, fire), loads may be re-directed in the best interest of CARE, DoS and/or transportation company.
- Drop-Off Site operational changes – In the event that a DoS modifies its internal operations (such as changes to self-haul services), CARE may change that site's designated CSE depending on logistics and site preferences.
- CSE Standing in the Program – In the event a CSE drops or is delisted from the program, CARE will, at its discretion, route material to a different CSE based on the standard protocols outlined within.

Disclaimer

CARE makes every effort to ensure cost effective and reasonably equitable load distribution throughout the state. CARE has the sole discretion to disperse and direct Public DoS loads based on the factors listed within this protocol as well as other factors not anticipated or defined within this document. CARE reviews rates and factors on an ongoing basis and reserves the right to implement changes as deemed essential to the Program's success, both logistically and financially, without input or evaluation from CARE designated CSEs, or existing or prospective DoS locations.