

From: Bob Gregory (bgregory@texasdisposal.com)

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To: lee.leffingwell@austintexas.gov; chris.riley@austintexas.gov; mike.martinez@austintexas.gov; kathie.tovo@austintexas.gov; laura.morrison@austintexas.gov; bill.spelman@austintexas.gov; sheryl.cole@austintexas.gov

Cc: marc.ott@austintexas.gov; bob.gedert@austintexas.gov; 'trirecycle@aol.com' (trirecycle@aol.com); 'rick@rickcofer.com' (rick@rickcofer.com); 'cegattuso@yahoo.com'; fayez@civiltude.com; 'james.nortey@gmail.com'; 'jeff.h.paine@gmail.com'; 'brent@ecology-action.org' (brent@ecology-action.org); David Armbrust; Adam Gregory (agregory@texasdisposal.com); Ryan Hobbs (rhobbs@texasdisposal.com)

Subject: Single Use Bag Ban and Recycling of Plastic Bags and Films

Dear Mayor and Council Members,

As you and your staff review the single use bag ban ordinance, and weigh the arguments on either side, I thought it might be of some value to you for me to convey the official position of Texas Disposal Systems regarding the issue of single use plastic bags and film plastics and a ban on the use of single use plastic bags. I will not be able to attend the scheduled March 1st city council discussion on the bag ban, so please accept these as my comments on the subject and as an alternative to the bag ban.

As you know, TDS currently receives 100% of the waste and recyclables collected by Austin Resource Recovery. Plastic bags present issues both at the landfill and in the materials recovery facility (MRF), and TDS is very interested in finding a solution to both the community wide litter problem caused by this material, as well as the specific issues affecting our facilities.

It is unfortunate that opinions on both sides of this matter have developed in such a way as to make it unlikely that we will arrive at a middle ground that is acceptable to all parties. It seems that this has become a zero-sum game with only winners and losers for the time-being. This is unfortunate because I believe there is opportunity for a compromise that could result in a greater win for sustainability, and a cleaner city than an all-out ban of single use bags is likely to bring, and an opportunity to avoid what would effectively be a tax on the use of a specific product. My compromise involves changing the economics of recovery of all types of plastic bags and film, and dramatically increasing the amount of plastic bags and film diverted from the landfill for recycling.

Single use plastic bags are almost exclusively made of polyethylene; whether it is high density or low density, polyethylene is a very recyclable commodity with healthy demand. However, MRF operators have traditionally rejected the concept of accepting film plastics in the curbside stream of recyclables for two reasons. First, it is very expensive to remove plastic film from the stream when it must be removed by hand one piece at a time, and it is very difficult to store film plastic while enough of it is being accumulated to make a bale, due to its high volume and very low weight. Second, single use plastic bags and plastic film becomes wrapped up in the automated screening equipment in the MRF, compromising the effectiveness of those screens, and increasing system down time and maintenance costs. These factors have traditionally made recovery of film plastics from curbside single stream materials highly unpopular with MRF operators and unsustainable. However, I believe it is feasible to develop a program that would make recovery of plastic bags and film through the curbside collected single stream just as easy and sustainable as paper bags, which cause no problems and are acceptable in virtually every curbside recyclables collection program.

TDS has expressed its desire to work with the City, local retailers, plastic bag manufacturers and the Zero Waste Advisory Commission to create a program that would allow residents to place single use plastic bags, and potentially all film plastics, into their blue single stream cart, only if they are consolidated or stuffed into another bag that is secure and strong enough to survive in the form of a stuffed pillow without bursting, until they reach the pre-sort conveyor or section of the MRF recycling system where the stuffed bag or pillow can be removed by hand. If all film plastics and reusable bags, which are often made of polypropylene, were included in the program, the material would most likely be

used as a source of energy; otherwise, if it were limited to polyethylene single use bags, the material could be recycled by traditional methods. Such a “Bag the Bag” program would enable the sorters in our MRF facility to remove plastic bags and film plastic from the system at a rate of dozens or hundreds of pieces at a time rather than one piece at a time. It would also greatly increase the percentage of bags and film plastic recovered from the stream, while significantly reducing the amount of bags and film plastic getting tangled in the equipment. Under these circumstances, I believe recovery of plastic bags and film plastics from single stream recyclables would be economical. Further, I believe by demonstrating that such a program can be successful, Austin can provide a better example to other cities of how to responsibly achieve sustainable practices than by simply joining the list of cities that have enacted a ban.

Of course, a “Bag the Bag” program would require a significant amount of public education and someone to pay the cost of the heavier duty stuff-bags, which would hold the single use and reusable plastic bags and plastic films. However, the alternative option, a ban, would require a similarly extensive education program, in addition to the cost of administering the ban. Further, if in the future the City wanted to discuss the addition of reusable plastic bags to the curbside collection of recyclables, a similar “Bag the Bag” program and education campaign would have to be undertaken as the current negative effects of plastic bags flowing through a MRF would only be compounded due to the additional strength, thickness and longer handles related to the heavy duty reusable plastic bags. I believe that the City, its businesses and citizens would be best served by initiating a single education campaign, focusing on litter reduction through proper curbside recycling of all plastic bags and film plastics through a “Bag the Bag” recycling program. In the alternative, the recycling program could focus initially on single use polyethylene plastic bags and be expanded to reusable polypropylene plastic bags at a later date.

TDS stands ready to work with the City and all stakeholders to develop the best program possible and to work with bag suppliers and retailers to help cover the cost of the stuff-bags. If I or my staff can be of any assistance to you or your staff, as you consider this important decision, please do not hesitate to contact me.

Respectfully,

Bob Gregory

“Bag the Bag”

A Program for Recycling Plastic Bags and Plastic Films in Austin, Texas

Overview

As an alternative to Austin’s contested proposal to charge fees and ban single use bags, Texas Disposal Systems (TDS) proposes a user-friendly curbside recycling program for all plastic bags and plastic films. A similar curbside program for recycling single-use plastic bags is underway in Madison, Wisconsin. An Austin “Bag the Bag” program, however, could be more comprehensive by including all types of film plastic and both reusable and single use plastic bags. In such an expanded program, the mixed film plastic material would most likely be utilized as an energy source due to the difficulty of separating the mixed plastics and reusable bags. If the program included only polyethylene, then the materials could be recycled in a more traditional fashion. Either way, this program could serve as a model for other cities to adopt, and supports Austin’s Litter Abatement and Zero Waste goals by efficiently diverting countless plastic bags and plastic films from the landfill for recycling.

How it Works

- Uniquely designed, durable plastic stuff-bags are distributed to Austin Resource Recovery customers. Stuff-bags would be approximately the size of an ice bag or pillow case, and include a unique color scheme with specific printed instructions about the recycling program. Stuff-bags could be manufactured in Texas, and distributed through local retailers and Austin Resource Recovery for a small fee to cover the cost of manufacturing and distributing stuff-bags. Both retailers and plastic bag manufacturers could be incentivized to provide or subsidize the cost of such stuff-bags.
- Austin Resource Recovery customers hang their empty stuff-bag under their kitchen sink, in their kitchen pantry, or in other convenient locations. Customers then load their stuff-bag with all types of clean plastic bags and plastic films. Acceptable items include:
 - ✓ All types of common plastic single use and reusable plastic bags with handles
 - ✓ Dry cleaning bags
 - ✓ Newspaper bags
 - ✓ Meat and vegetable bags
 - ✓ Bread bags
 - ✓ To-go-food bags
 - ✓ Ziploc-type bags
 - ✓ Saran wraps and cellophane products
 - ✓ Strapping for unitizing plastic and metal beverage products
 - ✓ All types of plastic wrap encasing products such as paper towel rolls, toilet paper, napkins, paper plates, etc.
- Once stuff-bags are filled with various types of plastic bags and plastic films, Austin Resource Recovery customers then simply toss the full stuff-bag in their blue single stream recycling cart.
- Full stuff-bags and other recyclables collected by Austin Resource Recovery are delivered to the Materials Recovery Facility (MRF) where they can be efficiently recovered from the stream at the pre-sort picking station.

Benefits

- Enhances the successful single stream recycling program operated by Austin Resource Recovery through addition of new materials to the program
- Embraces recycling and contributes to Austin's Zero Waste goal to systematically divert more recyclables and compostables from landfill disposal
- Educates citizens about recycling and litter reduction and provides them a convenient outlet for the materials
- Builds upon success achieved through the voluntary onsite plastic bag recycling programs at HEB, Central Market, Randall's, Wal-Mart and Whole Foods area locations
- Preserves consumer choice and retailers' ability to utilize both single use and reusable plastic bags and films, while offering an effective and efficient recyclables collection within the single stream flow
- Serves as a compromise to a heavily debated proposal, which may be challenged by stakeholders, such as the American Chemistry Council and plastic bag manufacturers, through the State Legislature
- Allows for the recycling of reusable bags through the single stream curbside recycling program, along with all other clean plastic bags and plastic films
- Provides a flow of plastics to be used either as a fuel or to mold into decking and other products locally