

Recyclable or Not Recyclable — That is the Question

by Gil Matar, SWANA Project Scientist

Recycling programs are starting up all over the country. Concerned citizens, wishing to take part in the green wave sweeping the nation, want to recycle virtually all of their waste. However, the citizens are caught between manufacturers, who strive to put the label "recyclable" on products, and recycling coordinators, who cannot practically collect everything. Central to this issue is the definition of the term recyclable.

In the absence of any limiting factors, anything that enters the MSW stream can be removed from it. The removed material can then be transported and used in a process to manufacture another product or to generate energy through combustion. Therefore, theoretically anything is "recyclable."

In the real world, however, for something to be "recyclable," a processor and manufacturer must be able to obtain it. As recycling processors and product manufacturers are not ubiquitous, transportation is one major limiting factor in classifying a given material as "recyclable."

Definitions

USEPA, realizing that there is no universal definition of "recyclable," asked for comments on a recommended definition. USEPA's recommended definition is: "The term 'recyclables' means products or materials that can be recovered from or otherwise diverted from the solid waste stream for the purpose of recycling." (Federal Register, 10/2/91)

SWANA's December 1991 comments to EPA stated: "[USEPA's] definition of 'recyclables' should include a clarification of the words 'can be recovered.' The words 'can be' are problematic in that what can be economically recovered in one part of the country may not be able to be recovered with any economical reasonableness in another part."

The USEPA, which received more than 250 comments on this and other definitions, is waiting to see whether the Federal Trade Commission will take any action on this front.

It is interesting to note that the Recycling Advisory Council (RAC) has also had difficulties in defining "recyclable." During the winter of this year, the RAC Policy Committee, in which SWANA participates, recommended to the full RAC that use of the term "recyclable" be prohibited. The task of finding a workable definition has now been given to another RAC committee.

Limiting Factors

Other than cost of transportation, there are two primary concerns that lead to something being considered "nonrecyclable." (For the purpose of this discussion, incineration will not be considered a recycling practice.)

The first of these concerns is contamination. Processors and manufacturers want clean, homogeneous materials. Products that are contaminated with other waste are essentially "nonrecyclable."

The second is the layered construction of a product. Examples are aseptic packaging and disposable diapers. Both of these are made from many layers of different materials. As the layers are difficult, if not impossible, to separate, it is difficult to provide a manufacturer with a usable raw material. Another example is the standard rubber-lined bottle top, which is often not allowed in curbside recycling bins. Very few products do not employ some type of layered, or mixed-material, construction.

Conclusion

Strong national guidance, in the form of enforcement of truth in environmental advertising, is necessary. Manufacturers must not employ misleading labels, while recyclers must clearly explain the reasons for omission of a certain material from the collection program. Once the consumer hears the truth, it is up to him to decide if he wants to create more demand-side incentives for recycling by purchasing not only recycled products, but also easily processed and recyclable (oops!) products.



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