



July 25, 2022

Carolyn Hoskinson

Director

Office of Resource Conservation Office of Land and Emergency Management

Environmental Protection Agency

1200 Pennsylvania Avenue N.W.

Washington, DC 20004

Re: Comments on the Development of the Solid Waste Infrastructure for Recycling (SWIFR) Grant Program, Request for Information, Docket ID No. OLEM-2022-0342-0001

Dear Director Hoskinson:

On behalf of the Glass Packaging Institute (GPI), the North America trade association for the glass container manufacturing companies, as well as suppliers of recycled glass, raw materials, equipment and transportation to the industry, I am pleased to provide the following perspective and comments for Docket No. OLEM-2022-0342-0001, the EPA's SWIFR Recycling Grant Program.

We believe that grant applications received to support and improve glass recycling programs should receive serious consideration, under funding allocated as part of the Bipartisan Infrastructure Law that the EPA is now putting in place. These efforts could include removal of plastics and similar materials frequently found in the single-stream glass MRF stream. As glass is a staple of residential recycling programs, with well-established domestic end markets, greater recovery will result in less landfill disposal, improved energy benefits and decreased greenhouse gas emissions.

Glass Recycling Background

Glass is a core, circular packaging material - reusable, refillable and endlessly recyclable. Public sentiment and surveys consistently place glass near the top of all recyclable packaging, understanding its recyclability, and as important, expressing a desire to continue glass recycling and keep it out of the landfill.

GPI member companies both process (clean up) and purchase recycled glass

collected from municipal programs. Recycled glass is a critical manufacturing input, 100% and endlessly recyclable, and is commonly used in the manufacture of new glass bottles and jars, as well as fiberglass insulation. Choosing glass as a package is a clear and sustainable option for brands.

A primary challenge for glass recycling is a supply-side issue, not a demand side challenge (or lack of desire for more glass). Much of what is currently reported as “recycled glass can contain up to 50% non-glass (meaning, trash, solid waste, other recyclables and similar). The current lack of investment, and its results are often expressed to local recycling program decision makers as “our glass has no markets”. Nothing could be further from the truth – the markets are there; however, they may require better initial sorting after collection.

As a result, glass’ “commodity” pile from most single-stream MRFs are filled with the types of small plastics - caps , straws miscellaneous small plastics - that often become marine debris or micro-plastics. This is due to the way most single stream programs are engineered, with small fractions of material going to one stream, often capturing the glass. To the extent that the Bipartisan Infrastructure Law and Save Our Seas Act intend to control plastic waste, significant amounts could be captured with additional cleaning equipment on the glass sorting line, or by better processing/cleaning of glass from MRFs before the residuals get delivered to landfill for disposal.

While curbside recycling services divert almost 12 million tons of recyclables from disposal each year, a significant percentage of these materials are contaminated because they are not properly sorted before they are collected. Glass is one of the recyclable commodities caught in this contamination mix.

We also ask that the EPA consider the following priorities as part of the Save Our Seas Act 2.0 and Bipartisan Infrastructure Law.

- **Federal funding and technical assistance** to improve community recycling programs, including investments for access, collection, and sorting and processing of materials, including modern infrastructure improvements.
- **Sorting:** a significant source of contamination is a lack of understanding about what materials should and should not be recycled. Providing promotion and education funding for materials development and sustained campaigns are key to reducing contamination and increasing yields. Grants should incentivize programs that provide active engagement

with households (checking carts, placing hang tags on problem carts) to address contamination issues.

- **Processing:** support investments in MRF modernization designed to improve yield and quality such as second eddy currents for aluminum and optical sorters and robots for plastics. It is also crucial to prioritize investments with demonstrated payoff given available markets and with MRFs that have contracts incentivizing quality.
- **Continued and expanded investment in domestic material processing and end markets.** Encourage domestic investment in capacity, upgrades, and innovation to address constraints in material processing and promote domestic recovery of glass and other recyclables.
- **Provide larger financial grants and leverage existing private sector investment initiatives** with additional funding to scale and accelerate outcomes. Experience shows that larger, targeted investments make more of an impact.

We look forward to additional opportunities to engage with the EPA on all recycling related issues and future opportunities to improve the system. Please reach out to me at any time with questions, or to learn more about the glass recycling process.

Thank you for your consideration of our comments.

Sincerely,



Scott DeFife
President