

TABLE C-4.—RECOMMENDATIONS FOR POLYESTER CARPET AND RECOMMENDED RECOVERED MATERIALS CONTENT LEVELS FOR NYLON CARPET FACING AND NYLON CARPET BACKING—Continued

Product	Material	Postconsumer content (%)	Total recovered materials content (%)
Nylon carpet backing	Vinyl	35–70	100

Notes: EPA's recommendations do not preclude a procuring agency from purchasing carpet made from other materials such as acrylic or wool. They simply require that procuring agencies, when purchasing nylon carpet, purchase it with recovered materials in either the fiber facing or the backing, or both, when it meets applicable specifications and performance requirements and when purchasing polyester carpet, purchase it with recovered materials in the fiber facing when it meets applicable specifications and performance requirements.

The nylon carpet recommendations would also include "renewed" nylon carpet, which is cleaned, retextured, recolored, or otherwise reused to produce a new nylon carpet product.

IV. What Comments Did EPA Receive on the Proposed CPG IV and the Draft RMAN for Nylon Carpet?

EPA received a number of comments on its proposed comprehensive procurement guideline for nylon carpet and its recovered materials content recommendations for nylon carpet face fiber and nylon carpet backing contained in the draft RMAN IV published on August 28, 2001 (66 FR 45297). Many commenters generally supported the designation of nylon carpet in the federal procurement guideline program and were generally supportive of EPA's recycled-content recommendations. However, some commenters recommended that EPA not designate nylon carpet at all, while others suggested that EPA not include traditional broadloom carpet in the guideline. Several commenters provided new information that suggested an alternative approach: that EPA should provide RMAN recommendations for the different types of nylon carpet (*e.g.*, broadloom vs. tiles or modular, and traditional broadloom vs. performance broadloom) and designate and/or provide recovered materials content recommendations for the entire nylon carpet product rather than issue separate recommendations for the fiber face and backing.

Eight commenters raised concern over the availability of recovered nylon for producing face fiber for nylon carpet, stating that the closure of the Evergreen nylon recycling facility would seriously impact the availability of recovered nylon face fiber. One commenter stated that closing of the Evergreen facility left no practical options for incorporating postconsumer nylon into new nylon carpet face fiber and that the remaining sources of recovered material feedstock for nylon carpet are post-industrial in nature and are not enough to satisfy EPA's criteria for designating a product. Commenters pointed out that using recycled content in traditional broadloom would be of particular concern since traditional broadloom

carpet does not have a structured backing that could easily incorporate recycled content and, therefore, most of the recycled content would have to be in the fiber face. Three commenters disagreed with this point of view and stated that the closure of the Evergreen facility should not prevent EPA from going forward with its designation because other fiber manufacturers have the ability to produce recovered content fiber with reasonable postconsumer levels. Some commenters questioned whether EPA should include recycled-content recommendations at all for traditional broadloom carpets, and one set of comments from members of the carpet industry questioned whether EPA should designate nylon carpet or issue recycled-content recommendations as part of the federal CPG program. These commenters claim that focusing on recycled content in nylon carpet could be inconsistent with the broader product stewardship goals established in industry environmental programs such as the Carpet America Recovery Effort (CARE) and could also divert scarce resources from such programs. The concerns from these commenters are that a postconsumer content requirement would foster the use of heavy weight backing products with postconsumer material as a filler and that, when broader issues of energy, emissions and other resources are taken into consideration, recycled content carpets are not always environmentally preferred over non-recycled content carpets. Another commenter stated that the development of an end of life recovery infrastructure has to precede the broad availability of postconsumer recycled materials for manufacturing.

One commenter believes EPA improperly restricted nylon backing products to those made from PVC or vinyl. The commenter believes that the recovered material used in the backing should not be limited to PVC or vinyl, because other technologies utilize other types of recovered material in nylon carpet backing and there are many other recovered nylon materials and products

that can and are being used in the manufacture of carpet backing. (These include old carpets containing urethane, fiberglass or latex.)

Four organizations submitted comments on fly ash (used as a filler material and substitute for calcium carbonate or limestone feedstock) as a recovered material in nylon carpet. Some requested that EPA not accept fly ash as a recovered material for nylon carpet while others believe that EPA should not restrict the types of recovered materials that make up carpet.

A number of commenters suggested recovered materials content ranges that EPA should consider in making final RMAN recommendations for nylon carpet. Since EPA had proposed separate recovered content recommendations for nylon fiber face and backing, many of the commenters recommended recovered materials content ranges for each carpet component (*i.e.*, fiber face and backing, separately). Some commenters recommended recycled content ranges for the entire carpet (*i.e.*, fiber face and backing combined). Copies of all of the comments submitted to EPA in response to the draft RMAN IV of August 2001 are located in the RCRA public docket in docket number F-2001-CP4P-FFFFF. See **SUPPLEMENTARY INFORMATION** section above for information on how to view or obtain copies of these comments. Based on the additional information provided in these comments, EPA is considering alternative approaches for nylon carpet, including the possibility of revised recommendations for recycled content based on the entire carpet instead of its components in the final RMAN. Section V, below, provides a summary of one possible approach.

V. A Possible Approach for Nylon Carpet

Based on the public comments received on the draft RMAN IV for nylon carpet (66 FR 45301, dated