



October 7, 2021

Ms. Nadine Doughman  
Senior Hazardous Substances Engineer  
Department of Toxic Substances Control  
Email: Nadine.doughman@dtsc.ca.gov

Dear Ms. Doughman:

On behalf of the California Retailers Association (CRA), I wish to express our support in keeping the Clean Earth Rancho Cordova facility open. CRA is recognized as the most significant voice representing the retail industry in California. CRA is the only statewide trade association representing all segments of the retail industry including general merchandise, department stores, mass merchandisers, online markets, restaurants, convenience stores, supermarkets and grocery stores, chain drug and specialty retail such as auto, vision, jewelry, hardware and home stores.

Clean Earth is a major contributor to the local economy adding \$13 million per year to the Region through wages, operational support goods and services, taxes, and disposal fees. Closing this facility means major economic loss and without Clean Earth, costs for waste collection will dramatically increase. This means commercial and residential costs will increase and in such uncertain times, increasing costs on businesses and working families cannot be an option.

Our hazardous waste facilities are crucial for maintaining compliance with hazardous waste rules. Removing a TSD facility from the network of facilities serving the retail industry could present significant delays in waste processing. Such delays could present compliance challenges for retailers by delaying 90-day hazardous waste pickups upon which retailers rely to maintain compliance with federal and California regulations.

Keeping this facility open will also avoid additional miles on the road from trucks transporting waste to other counties and states. Trucking materials out of state would add 116 metric-tons of carbon dioxide into the atmosphere, exacerbating greenhouse gas emissions polluting the air. The nearest hazardous waste disposal facilities are in San Jose (130 miles away) and Fernley, Nevada (160 miles away). It is worth noting that the State of Nevada has much less stringent hazardous waste disposal standards than California.

We respectfully request that you work to keep the Clean Earth Rancho Cordova facility open and keep the more that 100 full time employees employed.

**1121 L Street, Suite 607 • Sacramento, CA 95814 • P: 916/443-1975 • [www.calretailers.com](http://www.calretailers.com)**

Thank you for your consideration of our comments. If you have any questions, please feel free to contact me at (916) 443-1975 or [steve@calretailers.com](mailto:steve@calretailers.com).

Sincerely,

A handwritten signature in cursive script that reads "Steve McCarthy". The signature is written in a dark ink and is positioned above the printed name and title.

Steve McCarthy  
Vice President, Public Policy  
California Retailers Association