



## State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

CHRIS CHRISTIE  
*Governor*

KIM GUADAGNO  
*Lt. Governor*

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BOB MARTIN  
*Commissioner*

September 23, 2013

Association of New Jersey Recyclers  
Dominick D'Altilio  
120 Finderne Avenue  
Bridgewater, NJ 08807

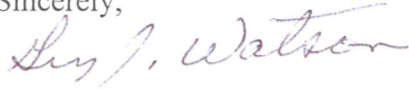
Dear Mr.D'Altilio:

Thank you for your recent letter regarding the receipt of wooden pallets at Class A recycling centers. I hope that the following clarification is helpful.

The receipt and accumulation of wooden pallets at a recycling center for Class A recyclable material, which results from the receipt and transport of Class A recyclable materials, i.e., through the normal course of operations at such businesses when Class A recyclable materials are palletized for more efficient transport or when pallets are used for containment purposes during transportation of said materials, is considered incidental to such a recycling operation, as described above. These materials are not received as recyclable commodities, but rather are incidental to the business at hand. As such, the receipt and storage of these items would not be viewed as the receipt and storage of Class B recyclable materials despite the fact that wooden pallets are considered a Class B recyclable material should they be received at a recycling center designed to receive and process wood scrap. In addition, the Department agrees that the repair and reuse of those broken wooden pallets that are sometimes received at recycling centers for Class A recyclable materials as a result of normal Class A recycling center operations is not a regulated activity in such cases.

Please be advised, however, that should a Class A recycling center desire to receive, store, process or transfer truckloads of wooden pallets, i.e., operate a recycling center for Class B recyclable material, such an operation would require a general approval to operate as per N.J.A.C. 7:26A-3.

Sincerely,

A handwritten signature in cursive script that reads "Guy J. Watson".

Guy Watson, Chief  
NJDEP, Bureau of Recycling and Planning

c. Marie Kruzan, Association of New Jersey Recyclers