



June 16, 2020

**To:** Local Jurisdictions

**Subject:** Tracking Disposed Recyclables due to COVID-19

The purpose of this email is to provide jurisdictions with guidance on how to report recyclables that were not able to be diverted as a result of the COVID-19 state of emergency and processing facilities being closed.

Recyclables that are being disposed of due to the COVID-19 state of emergency **cannot** be reported as disaster debris by facilities in RDRS. The 901 RDRS regulations define "disaster debris" with a cross-reference to 14 CCR 17210.1(d), the emergency waiver regulations. The emergency waiver standards that originated the "disaster debris" definition do not include landfilled recyclables in this situation within the "disaster debris" waste definition because the recyclables in the immediate case are a) not from "cleanup and repair" of a declared disaster area; and b) not any different from solid waste normally generated by residential, industrial, and commercial waste sectors. Accordingly, recyclables should be reported by facilities in RDRS as they are being sent by material type (mixed recyclables, solid waste, etc.) and disposition. And, since they are being disposed of, the material will be reported by the jurisdiction of origin.

Jurisdictions that have been impacted with increased disposal tonnages due to the COVID-19 state of emergency will need to submit a disposal modification request in the 2020 electronic annual report that is submitted Aug. 1, 2021. Due to the resource and time constraints, we will utilize a process similar to that used for the reporting of disaster waste. The procedures for Jurisdictions Claiming Disaster Waste from Disposal can be found on the [CalRecycle website](#).

## Requirements for Jurisdictions Claiming a Disaster Waste Disposal Deduction

1. Make maximum efforts to recycle, reuse, or otherwise divert from disposal as much of the material as possible. See California Code of Regulations (CCR), Title 14, Division 7, Chapter 9, Article 9, section 18794.2 (g)(2).
2. Complete and submit the [Reporting Year Disposal Tonnage Modification Request and Certification form](#) with your annual report.
  - Even though the increased tonnages are not disaster waste, check the box on the form for disaster waste, then, when filling out section A9, indicate that the disposal modification is for increased disposal tonnages due to the COVID-19 state of emergency.

- Jurisdictions will must also provide the following information:
  - Provide the [state of emergency proclaimed by the Governor](#).
  - Provide tonnage information and supporting documentation of the tonnage being claimed for the deduction.
  - Describe the diversion programs implemented to maximize the diversion of the COVID-19-related solid waste, including why the recyclables had to be disposed of and could not be diverted.

Please also refer to these resources:

- [Disaster Waste Guidelines](#)
- [Disaster Preparedness & Response](#)

Should you have any questions, please contact your Local Assistance liaison directly or by calling [\(916\) 341-6199](tel:9163416199).