

CALRECYCLE ILLEGAL DUMPING TECHNICAL ADVISORY COMMITTEE - IDTAC 2020 Work Plan

I. **Background**

The IDTAC remains determined to develop fresh resources and objectives that reduce the occurrence and increase California's collection of best practices for managing illegal dumping.

During the course of several meetings, IDTAC members discussed ideas for improving the current framework from updating the online toolbox for illegal dumping resources, to establishing smaller subcommittees to discuss specific issues.

The toolbox has six topics areas, prevention, abatement, cleanup, enforcement, outreach, and the homeless encampment resource guide. The IDTAC offered suggestions to improve each topic as described on page six of the [November 6, 2019 IDTAC Meeting Minutes](#):

At its June 3, 2020 meeting ([Agenda](#)) the IDTAC finalized its subcommittee framework, now called the 2020 Work Plan, and committed to poll for participation on subcommittees to achieve the IDTAC's work plan goals.

Members and interested parties were asked to join a subcommittee and review the intentions and initial expectations. Some expectations may overlap and subcommittees may need to modify the initial expectations.

The IDTAC identified four work plan components to develop fresh resources and tools for jurisdictions, communities, contractors, and others to assist in addressing issues related to illegal dumping. Components include Strategy, Outreach, Standards, and Enforcement.

The subcommittee members will shape the specific goals and work products within their group.

II. **Strategy Subcommittee**

Expectation - Compile and develop strategies for:

- Guidance for creating and facilitating local and regional partnerships with public agencies, private entities, and/or non-profits
- Measures for establishing and maintaining cleanup programs
- Identifying available funding resources
- Development of benchmarks or methods to gauge program effectiveness
- Addressing and incorporating environmental justice into programs

III. **Outreach Subcommittee**

Expectation - Compile and develop concepts for:

- Education and outreach methods for preventing illegal dumping, including measures to facilitate community involvement including reward programs
- Property owners to address illegal dumping on their property
- Effective tools for discouraging future incidents
- Applications to report illegal dumping activities

- Effective news and social media outreach and involvement to publicize illegal dumping convictions including case studies

IV. **Standards Subcommittee**

Expectation - Compile and develop standards related to:

- Cleanups of illegal dumping sites
- Identify levels for training personnel involved in cleanups
- Develop consistent data collection criteria
- Identify guidance for reporting and tracking cleanup costs
- Updating homeless encampments cleanup guidance
- Health and safety measures

V. **Enforcement Subcommittee**

Expectation - Compile and develop methods for creating effective enforcement tools including:

- Available federal, state, local solid waste codes, ordinances, administrative orders, and other measures available as enforcement tools
- Case studies on effective enforcement and deterrents to illegal dumping
- Guidance on developing local Illegal Dumping Enforcement Officers and enforcement teams
- Measures that can hinder implementation of enforcement programs and potential prosecution
- Examples of how to document evidence successfully.
- Information on effective surveillance systems

VI. **Subcommittee Members and Kickoff Meeting Dates**

Strategy – Kickoff Meeting date, September 3, 2020 virtual

Doug Kobold, Maria Ferdin, Taylor Grimes, Jacy Bolden, Kathy Lynch, Marr Christian, Tedd Ward, Nick Lapis, Ted Horton, Erin Armstrong, Stephanie Becker* (additional members may be added at a later date)

Outreach – Kickoff Meeting date, September 1, 2020 virtual

Veronica Pardo, Stephanie Becker*, Iranzu Morras, Tracie Glaves, Benjamin Lucha, Taylor Grimes, Paulina Lawrence* (additional members may be added at a later date)

Standards – Kickoff Meeting date September 4, 2020 virtual

Larry Sweetser, Carlos Duque, Gonzalo Barriga, Nicholas Martorano, Win Cowger, Rebecca Oliver*, (additional members may be added at a later date)

Enforcement – Kickoff Meeting date, September 2, 2020 virtual

Maria Ferdin, Marr Christian, Alyce Sandbach, Jamaica Moon, Jennifer (Kibbe) Day, Gonzalo Barriga, James Gordon, Karen Tandler, Dylan Brady, Dave Dearborn, Paulina Lawrence* (additional members may be added at a later date)

*indicates CalRecycle staff

VII. **Framework for November 18, 2020 Progress Reports**

Chair Larry Sweetser suggested the following framework for reporting progress that reflects the efforts of several meetings held by each subcommittee:

- identify top two to three priorities for your subcommittee
- identify what makes those priorities important
- what's needed for implementation (what's the strategy that shows how to move a priority forward)
- identify needed resources for each priority
- topics that might be directed to other subcommittees
- what does success look like

VIII. **Initial Draft of Subcommittee Recommendations for November 18, 2020 Update**
Strategy Subcommittee determined at least three key priorities:

1. Elevate the existing Toolbox
 - Add social media and multi-agency coordination
 - Make toolbox a one-click on CalRecycle/CalEPA home page drop downs
 - Include the 3 E's wrapped into the PACE/Outreach pillars (and elaborate parts as expressed by members)
 - Include checklists for several components
2. Elevate and modify Homeless Encampment cleanups
 - Get more involved with groups/committees so cleanup aspects become part of policy consideration
3. Predict future illegal dumping needs, such as move-outs as a result of COVID-19 effects on economy, housing, valuation of products and materials
 - Seek additional partners such as Real Estate Board, property management companies
 - Identify methods to value packaging and other materials and/or develop guidance to prevent materials from becoming waste/litter)

Enforcement Subcommittee outlined six priorities and two recommendations:

1. Develop information towards the creation of a statewide training program for illegal dumping enforcement officers: a POST-certified environmental law enforcement officer. Critical: the value of this particular training program will depend on the nature of the enforcement authority held by the agency (i.e., agencies with administrative authority only may not benefit from training programs that support officers with peace officer authority to issue citations to traffic court).
2. Gather information regarding which agencies have used cameras for illegal dumping enforcement and collect key details about their programs, to help improve the use of cameras and to aid those considering buying them. Critical: a camera program's success is dependent on whether there are resources for follow-up investigations.
3. Develop a list of laws relevant to illegal dumping (including local ordinances that other jurisdictions may want to consider)
4. Gather sample documents such as criminal complaints, warning letters, notices to abate, requests to contact.
5. Share case studies internally to illustrate what works and doesn't work.
6. All the above includes some informal networking with others in enforcement in other jurisdictions, and members developed an informal directory of those enforcement contacts.

Recommendations:

1. Add to toolkit: list members of this subcommittee, as persons to contact for questions and additional materials. This would be part of short paragraph regarding what this subcommittee does. Subcommittee will submit draft proposed language.
2. Support for subcommittee's creation of an enforcement general membership to help share ideas, contribute resources, lend general support to other enforcement officers around state who are grappling with same issues. Members are already in touch informally with many such as Los Angeles District Attorney staff who expressed interest in being in the loop, and has ideas to contribute on what has worked on illegal dumping legislation in past. NYC has strong enforcement program.

Outreach Subcommittee a key priority and explanation:

Priority: what is education/outreach and how do we strengthen it?

Observations:

- Strong synchronicity between education and enforcement
- Community involvement is critical
- Education must be adapted
- Everyone needs a win!

Importance: they help create a more successful illegal dumping management program.

Success: sustainable and effective programs at the community level

Standards Subcommittee outlined two key priorities and two additional to consider later:

1. Develop data criteria – the member recommend the following proposed basic categories for tracking illegal dumping by agencies to allow cumulating data statewide on the magnitude of cleanups. The simpler the list, the more likely it will be completed. The proposed units for each item are in cubic yards to facilitate field measurements.
 - Solid waste/Trash – mixed materials that are segregated
 - Metal – larger metallic items
 - Hazardous waste – all types except e-waste
 - E-waste – This is a significant portion and worthy of tracking
 - Sharps
 - Furniture – small and large items
 - Appliances – range from refrigerators to table top items and may require special handling
 - Tires
 - Mattresses – A common item that has funding available
 - Recyclables – CRV, paper
 - Feces, urine – require special handling
 - Dead animals - require special handling
 - Other – miscellaneous category
2. Develop training standards – the subcommittee developed a comprehensive matrix of proposed training as well as a guide that explains the matrix. The draft guide is included below, and the draft matrix is available upon request by emailing CalRecycle at [Sharon Anderson](#)

Draft Training Matrix Guide

Illegal dumping crews encounter variety of potential hazards during clean-up activities. This Training Matrix and Guide provides a framework for potentially applicable health and safety, emergency services, and law enforcement trainings.

Each Illegal clean up situation should be assessed for which training are applicable. The illegal Dumping Training Matrix categorizes four major groups that are involved in cleaning up illegal dumping sites. This document provides a framework for applicable training recommendations for each group. Other types of clean up groups may exist and can utilize these recommendations as needed. Each group has specific training requirements for the staff involved in the cleanup but also additional requirements for the personnel supervising the clean-up activity. These supervisory personnel need awareness of potential situations that might require additional measures or notification of emergency services or law enforcement.

Volunteer/Community Groups

These groups are organized to conduct periodic clean ups of areas in their communities, often on a voluntary basis. These cleanups often occur in neighborhood, parks, and waterways. Training needs are basic to protect their health and safety and to recognize the need for a supervisor to determine if additional services are required to address a situation. These potential situations include: a hazardous waste collections, a crime scene, disposal of drug lab wastes, or other conditions that may jeopardize the safety of the personnel.

Public Works/Parks/Contracted

Public works personnel, parks department staff, and entities contracted to clean up illegal disposal events on a routine basis commonly encounter situations with a variety of solid wastes including trash and larger items like mattresses and furniture. These clean ups are often in response to reported incidents. The size of these range from a discrete pile to a larger areas of community dumping locations. Low level hazardous wastes are common at these cleanup sites and often include but not limited to electronics, paint, and automotive chemicals. These hazardous wastes are either removed from the site to a service yard, delivered to a Household Hazardous Waste facility, or arrangements are made for a hazardous waste contractor to collect the hazardous waste from the location.

HazMat Team

Hazardous materials teams are either contracted personnel or are agency staff that conduct cleanups of sites that are recognized as uncontrolled hazardous waste sites containing significant amounts of hazardous waste or hazardous waste that pose a risk to public health or the environment. These crews are subject to the Hazardous Waste Operations and Emergency Response (HAZWOPER) standards of California Code of Regulations. Title 22, Section 5192 (a)(1).

Homeless Encampment

Homeless encampment involve specialized cleanups due to the nature of the locations where one or more homeless people live in an unsheltered area usually without benefit of sanitary services. Clean up of these sites occurs after authorities evict the homeless tenants who may leave behind their possessions, solid wastes, abandoned vehicles, dead animals, and human waste. Some hazardous wastes may be present, but a primary hazard is human waste, possible drug related paraphernalia including needles, and potentially infectious waste.

Training Requirements

The training requirements are grouped into occupational safety trainings to address potential issues applicable to the clean-up situation and law enforcement related trainings. Each of the occupational safety trainings has specific regulatory requirements that may apply to the specific situation or activities conducted at the site. Not all trainings are applicable, and some activities may not fit in specific regulatory requirements. Some trainings may be combined with other trainings depending upon applicability. Trainings on this list can be reviewed for applicability and then the training can be provided to the staff participating in the cleanup. A

fundamental concept of under safety requirements if the General Duty Clause requiring employers to keep their workplaces free of serious recognized hazards.