

Recycling and Disposal Reporting System (RDRS): What should jurisdictions know?

June 22, 2021

Steven Sander

Senior Environmental Scientist, Knowledge Integration Section



- 1. What is RDRS?
 - a) What changed?
 - b) Who is required to report?
 - c) What needs to be reported?
- 2. How will this affect the EAR? What else do jurisdictions need to know?
- 3. Q&A

WHAT IS RDRS?

WHAT CHANGED?

WHO IS REQUIRED TO REPORT?

WHAT NEEDS TO BE REPORTED?



WHAT IS RDRS?

- Online quarterly reporting system for recycling and disposal information implementing AB 901 (Gordon, Chapter 746, Statutes of 2015).
- Regulations approved by OAL and became effective March 2019.
- Replacement for electronic Disposal Reporting System (eDRS), beginning with Q3 2019 (Jul-Sep) reporting period.
- Expands reporting scope. Adds penalties for non-compliance.



DRS vs. RDRS

DRS (old)

Disposal and disposal-related activities

Quarterly reporting

Entities reported via counties* to CalRecycle

Limited reporting on recycling

*in general, with certain exceptions

RDRS (new)

Disposal and disposal-related activities

Quarterly reporting

Entities report directly to CalRecycle

Reporting on recycling/composting, brokering/transporting, and end use outflow streams

Reporting on source sector for directhauled solid waste

Penalties for non-compliance



VS.

WHO REPORTS IN RDRS?



RDRS: WHO MUST REPORT?

Food Waste Self-Haulers

 who haul ≥13 cy (6,500 lbs.) of their own food waste to a facility or operation not owned or operated by them.

Contract Haulers

 who haul 100 tons or more of outof-state or 50 or more tons to direct land application.

Transfer/Processing Facilities & Operations

 who transfer/process 100 tons or more (or 2,500 tons if exclusively CDI).

All thresholds are on a per-quarter basis and for all reportable materials unless explicitly specified otherwise.

Permitted Disposal Facilities

 Landfills, EMSW conversion, transformation, inert debris type A/B disposal, CDI waste disposal, industrial waste co-disposal, and waste tire disposal facilities must report at any tonnage.

Recycling & Composting Facilities & Operations

 who sell or transfer 100 or more tons (or 2,500 tons if exclusively CDI).

Brokers & Transporters

 who sell or transfer 100 tons or more.



RDRS REPORTING HIERARCHY





WHICH MATERIALS ARE REPORTABLE?

Carpet

Construction, demolition and inert debris (CDI)

Furniture, excluding mattresses

Glass, excluding CRT

Metals

Organics

Paper

Plastic

Solid waste (includes mixed materials & residuals)

Tire-derived rubber or fuels

Textiles

White and brown goods



LIMITATIONS OF RDRS

- Entities report recyclable material outflows, not inflows.
- Recycling is not tracked by jurisdiction of origin.
- Reporting exemptions preclude RDRS from tracking certain material flows.

CURRENT STATUS

- Implemented, operational, and undergoing further IT Services software development (build 1.04.0056).
- Received over 7,200 quarterly report submissions & resubmissions (Q3 2019—Q1 2021).
- In 2022, SB 1383 (Lara, Chapter 395, Statutes of 2016) regulations will add additional RDRS reporting requirements.

DUE DATES

Reporting Entity Activity	1st Quarter Submittal Period	2nd Quarter Submittal Period	3rd Quarter Submittal Period	4th Quarter Submittal Period
Contract Haulers hauling out-of-state*	April 1 to April 30	July 1 to July 31	October 1 to October 31	January 1 to January 31
Food waste self-haulers	April 1 to April 30	July 1 to July 31	October 1 to October 31	January 1 to January 31
Transfer/Processors	May 1 to May 31	August 1 to August 31	November 1 to November 30	February 1 to February 28
Recycler/Composter	May 1 to May 31	August 1 to August 31	November 1 to November 30	February 1 to February 28
Brokers	May 1 to May 31	August 1 to August 31	November 1 to November 30	February 1 to February 28
Transporters	May 1 to May 31	August 1 to August 31	November 1 to November 30	February 1 to February 28
Disposal Facility (landfill, transformation				
facility, Engineered Municipal Solid Waste				
facility)	June 1 to June 30	September 1 to September 30	December 1 to December 31	March 1 to March 31
Other Disposal facility	June 1 to June 30	September 1 to September 30	December 1 to December 31	March 1 to March 31

https://www2.calrecycle.ca.gov/Docs/Web/115704



COMPLIANCE

- RDRS performs basic data validations prior to report submittal.
- Staff Review team follows established procedures to examine submitted reports.
 - If issues found, notices sent to entities for follow-up. Responses and/or revisions required—within 14 days.
- Non-compliant entities referred to Waste Permitting, Compliance, and Mitigation Division (WPCMD).



How will this affect the EAR?

WHAT ELSE DO
JURISDICTIONS NEED TO
KNOW?

RY 2020 EAR DISPOSAL DATA

- RY 2020 First year using all RDRS data.
 - For RY 2019, we used:
 - DRS data for Q1 & Q2 2019
 - RDRS data for Q3 & Q4 2019

- Disposal data available 30 days after disposal facility submittal.
- RDRS Public Reports available on CalRecycle's Web site



RDRS & DISPOSAL MODIFICATIONS

 RDRS regulations do not alter the process for initiating a disposal modification.

 Data has been released well in advance of the EAR, ensuring that jurisdictions have an opportunity to follow up with facilities to address potential misallocations.

This year, as always, please continue to work with LAMD staff.



RDRS & DISPOSAL MODIFICATIONS (CONT'D)

- What not to claim:
 - Disaster debris as of 7/1/2019
 - Designated waste as of 7/1/2019

- Other tidbits:
 - Please work directly with facilities to address misallocations.
 - New RDRS Complaints Module forthcoming.
 - 41821.5(g)(2) Record review at the disposal facility
 - AB 1594 Green material ADC



EXPORT & LAND APPLICATION

- Exported waste will continue to be reported upon by various facilities, usually contract haulers and transfer stations, by jurisdiction of origin.
- Land application still considered a recycling activity (not tracked by jurisdiction of origin).
- Who reports on land application? Generally speaking:
 - Contract haulers
 - Recycler/composters
 - Broker/transporters







Subscribe to the RDRS listserv!

https://www2.calrecycle.ca.gov/Listservs/Subscribe/157



RDRS Web page:

https://www.calrecycle.ca.gov/swfacilities/rdreporting/



RDRS Coordinator Knowledge Integration Section (916) 341-6777 RDRS@CalRecycle.ca.gov