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

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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

<table>
<thead>
<tr>
<th>DRS (old)</th>
<th>RDRS (new)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disposal and disposal-related activities</td>
<td>Disposal and disposal-related activities</td>
</tr>
<tr>
<td>Quarterly reporting</td>
<td>Quarterly reporting</td>
</tr>
<tr>
<td>Entities reported via counties* to CalRecycle</td>
<td>Entities report directly to CalRecycle</td>
</tr>
<tr>
<td>Limited reporting on recycling</td>
<td>Reporting on recycling/composting, brokering/transporting, and end use outflow streams</td>
</tr>
<tr>
<td>Reporting on source sector for direct-hauled solid waste</td>
<td>Penalties for non-compliance</td>
</tr>
</tbody>
</table>

*in general, with certain exceptions
Who Reports in RDRS?

- Transfer/Processors
- Disposal facilities
- Recyclers and composters
- Haulers (only out-of-state or to direct land application)
- Brokers and transporters
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 out-of-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).

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.

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

Organization/Site

Reporting entity(ies)

Dependent recycling activity(ies)
<table>
<thead>
<tr>
<th>Materials</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carpet</td>
<td>Construction, demolition and inert debris (CDI)</td>
</tr>
<tr>
<td>Furniture, excluding mattresses</td>
<td>Glass, excluding CRT</td>
</tr>
<tr>
<td>Metals</td>
<td>Organics</td>
</tr>
<tr>
<td>Paper</td>
<td>Plastic</td>
</tr>
<tr>
<td>Solid waste (includes mixed</td>
<td>Tire-derived rubber or fuels</td>
</tr>
<tr>
<td>materials &amp; residuals)</td>
<td>Textiles</td>
</tr>
<tr>
<td>White and brown goods</td>
<td></td>
</tr>
</tbody>
</table>
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.
<table>
<thead>
<tr>
<th>Reporting Entity Activity</th>
<th>1st Quarter Submittal Period</th>
<th>2nd Quarter Submittal Period</th>
<th>3rd Quarter Submittal Period</th>
<th>4th Quarter Submittal Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contract Haulers hauling out-of-state*</td>
<td>April 1 to April 30</td>
<td>July 1 to July 31</td>
<td>October 1 to October 31</td>
<td>January 1 to January 31</td>
</tr>
<tr>
<td>Food waste self-haulers</td>
<td>April 1 to April 30</td>
<td>July 1 to July 31</td>
<td>October 1 to October 31</td>
<td>January 1 to January 31</td>
</tr>
<tr>
<td>Transfer/Processors</td>
<td>May 1 to May 31</td>
<td>August 1 to August 31</td>
<td>November 1 to November 30</td>
<td>February 1 to February 28</td>
</tr>
<tr>
<td>Recycler/Composter</td>
<td>May 1 to May 31</td>
<td>August 1 to August 31</td>
<td>November 1 to November 30</td>
<td>February 1 to February 28</td>
</tr>
<tr>
<td>Brokers</td>
<td>May 1 to May 31</td>
<td>August 1 to August 31</td>
<td>November 1 to November 30</td>
<td>February 1 to February 28</td>
</tr>
<tr>
<td>Transporters</td>
<td>May 1 to May 31</td>
<td>August 1 to August 31</td>
<td>November 1 to November 30</td>
<td>February 1 to February 28</td>
</tr>
<tr>
<td>Disposal Facility (landfill, transformation facility, Engineered Municipal Solid Waste facility)</td>
<td>June 1 to June 30</td>
<td>September 1 to September 30</td>
<td>December 1 to December 31</td>
<td>March 1 to March 31</td>
</tr>
<tr>
<td>Other Disposal facility</td>
<td>June 1 to June 30</td>
<td>September 1 to September 30</td>
<td>December 1 to December 31</td>
<td>March 1 to March 31</td>
</tr>
</tbody>
</table>

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
STAY ENGAGED

Subscribe to the RDRS listserv!
https://www2.calrecycle.ca.gov/Listservs/Subscribe/157

RDRS Web page:
https://www.calrecycle.ca.gov/swfacilities/rdreporting/

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