

# Best Management Practices for Implementing a Route Review Program

## Introduction

The Short-Lived Climate Pollutant Reduction Law (SB 1383, Lara, Chapter 395, Statutes of 2016) is the biggest change to the recycling and waste industry since the 1980s. In addition to introducing new mandatory statewide residential organics recycling collection requirements, the law also introduces specific container contamination minimization requirements.

As new materials have been introduced into the waste stream, contamination has increased and contributed to high labor and equipment costs and often made trash of truly recyclable items. In other words, contamination is the greatest threat to the recycling system and must be addressed.

To assist with successful implementation, CalRecycle has compiled optional best management practices and resources for conducting route reviews.

## New Contamination Monitoring Requirements

To address contamination, SB 1383 establishes route review requirements for all three-plus, three, and two-container collection systems [see 14 CCR Chapter 12, Article 3, Section 18984.5(b)].

Depending on the collection system selected, all containers, e.g., may include gray, blue, or green containers for three container collection service, on a hauler route must be evaluated for prohibited container contaminants. This also applies to containers that are split or divided into sections for separate materials.

Jurisdictions are responsible for conducting hauler route reviews [see 14 CCR Chapter 12, Article 3, Sections 18984.5 and 18984.6, and Article 14, Section 18995.1]. Many jurisdictions delegate this activity to a hauler or other service provider through a franchise agreement or contract.

Many jurisdictions already have robust route review programs and often include the requirements and specifications for container contamination minimization within their franchise agreements, contracts, permits, etc. This guidance document is a compilation of CalRecycle's surveys with local government, haulers, and other service providers that have robust programs to identify best management practices for route reviews.

## Disclaimer

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*This document may be periodically updated. The requirements for route reviews can be found in 14 CCR Section 18984.5. If you need further assistance, please contact your CalRecycle Local Assistance and Market Development (LAMD) staff (<https://www2.calrecycle.ca.gov/lqcentral/Contacts/>).*

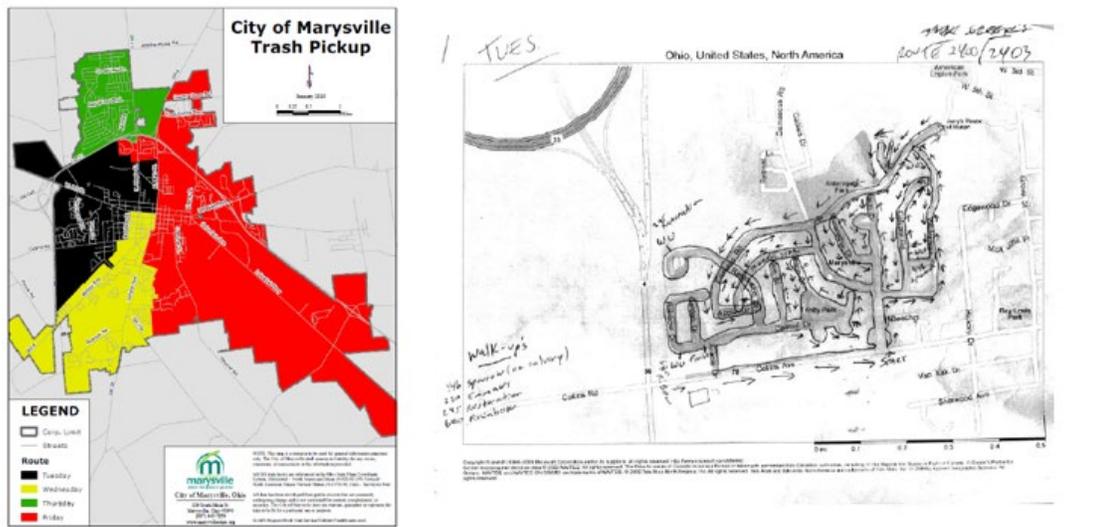
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## Step 1: Determine Hauler Routes

“Hauler Route” means the designated itinerary or sequence of stops for each segment of the jurisdiction’s collection service area [see 14 CCR Chapter 12, Article 3, Section 18982(a)(31.5)]. SB 1383 regulations allow jurisdictions flexibility to determine their hauler routes, since hauler routes can significantly vary between jurisdictions depending upon the types of generators, location, and hours of facility or facilities where materials will be hauled to, route efficiencies, and a myriad of other factors.

Many jurisdictions establish hauler routes and the frequency of collection through their service agreement or contract. Hauler routes include stops that service residential, commercial, or residential and commercial generators, with any type of service vehicle (e.g., side, rear, and front loaders), as well as different container types (e.g., carts, bins, and compactors). Jurisdictions, or their designee, often use routing software to create hauler routes.



These images are examples of what hauler created routes could look like.

## Step 2: Specify Container Inspection Method

Jurisdictions should identify which inspection method they plan to use to determine if there is contamination in the collection containers (carts, bins, or compactors). Jurisdictions may implement one or multiple inspection methods, including by route type (single-family, multi-family, and commercial customers) and/or by container type (gray, green, or blue).

## Inspection Methods

### Manual and Physical Inspections

**Recology** has implemented manual, physical inspections of curbside containers. [Watch an inspection](#) from a Recology Diversion Auditor's perspective and learn:

- How they inspect containers
- Common contamination
- Examples of passing and failing inspections
- Best practices for proper sorting



### Visual Inspections via On-Board Monitoring System (Camera on truck)

**Waste Management** has used cameras on trucks for almost 10 years. Mounted cameras record the containers serviced. Cameras identify the contents of a contaminated container.



Resources:

- [Emeryville Inspections](#)
- [Liberty Lake Inspections](#)

**Athens Services** uses cameras to help identify contamination. [Watch a video](#) of a collection truck driver address contamination on a collection route by communicating with dispatch about following up with customers.



## Visual Inspection via Remote Monitoring (Third-Party Surveillance)

The South Bayside Waste Management Authority (SBWMA) uses **Compology** technology to monitor business waste behavior to ensure waste and recycling material is disposed of in the correct bins. With remote monitoring and reporting, SBWMA gets a better picture of how each customer location performs in terms of utilizing containers and services to meet California mandates.



Resources:

- [Compology Case Study](#)

## Step 3: Schedule Annual Route Reviews

Jurisdictions must maintain a description of the hauler route (e.g., commercial or residential), including the addresses covered by the route review, in their [records](#) [see 14 CCR Chapter 12, Article 3, Section 18995.1]. While every hauler route must be reviewed annually, the number of inspections for each container type is not specified in the regulations. For example, a jurisdiction may increase inspections on routes where there is more contamination.

Other Considerations

- Consider dividing the total amount of routes by the months (12) in a year. This will determine how many routes need to be reviewed each month to ensure all hauler routes are reviewed annually.
- Route reviews are typically performed before the material is collected on the day of collection.

## Step 4: Determine Number of Containers to Inspect per Route

Jurisdictions have the flexibility to determine the number of each type of container to inspect on each route. There are no minimum container inspection requirements [see 14 Chapter 12, Article 3, CCR Section 18984.5(b)].

Jurisdictions may use a random number generator to select containers to inspect along a route. They may also establish the number of containers inspected based on the number of generators per hauler route.

Jurisdictions may also be more stringent than the regulations and require a specific percent of containers be inspected along each route.

## Step 5: Notify Generator of Violation and Provide Education on Proper Sorting

# OOPS!

Something was wrong with your container.  
Algo andaba mal con tu contenedor.



**Contaminated**  
Contaminado



**Blocked**  
Obstruida



**Overflowing/heavy**  
Desbordante/Pesado

**SERVICED/RECOGIDO:** If the issue continues, your container will not be serviced. / Si el problema continúa, su contenedor no será recogido.  
 **NOT SERVICED/NO RECOGIDO:** Your container will not be serviced until corrective action is taken. / Tu contenedor no será recogido hasta que se tomen medidas correctivas.

DATE/FECHA: \_\_\_\_\_

CONTAMINATION CIRCLED BELOW  
CONTAMINACIÓN EN UN CÍRCULO

 <b>1. Plastic Bags / Film Plastic</b> Bolsas y Película de Plástico	 <b>2. Plastic Bagged Materials</b> En bolsas de plástico Materiales	 <b>3. Styrofoam™</b> Espuma de Poliestireno
 <b>4. Cans and Bottles</b> Latas y Botellas	 <b>5. Soda / Coffee Cups</b> Tazas de Refresco y Café	 <b>6. Carpet / Clothing</b> Alfombra / Ropa
 <b>7. Wood / Yard Waste</b> Madera y Desechos de Jardín	 <b>8. Dirt / Gravel</b> Tierra / Grava	 <b>9. Propane Tanks</b> Tanques de Propano
 <b>10. Hazardous Materials</b> Materiales Peligrosos	 <b>11. Glass</b> Vidrio	 <b>12. Bulky Item</b> Artículo Grande

13. OTHER / OTRA: \_\_\_\_\_

Contaminated / Contaminado
 Blocked / Obstruida
 Overflowing/heavy / Desbordante/Pesado

CIRCLE TYPE & BIN / CÍRCULO TIPO Y BIN → COM. RES.   

SERVICED / RECOGIDO  
 NOT SERVICED / NO RECOGIDO

Date \_\_\_\_\_ Route \_\_\_\_\_ Driver \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_

Contamination:  
1 2 3 4 5 6 7 8 9 10 11 12 13: \_\_\_\_\_

Notes: \_\_\_\_\_

If prohibited container contaminants are observed in the container, the jurisdiction or hauler must notify the generator of the contaminants and inform them about how to properly separate materials [see 14 CCR Chapter 12, Article 3, Section 18984.5(b)(1)].

Jurisdictions may leave notices on the generator's container, gate, or door at the time the violation occurs and/or notify them after by mail, email, or other electronic message. Notices and education and outreach materials must be translated into any non-English language spoken by a substantial number of the public provided organic waste collection services by the jurisdiction.

Although the regulations do not require jurisdictions to impose administrative penalties on generators who contaminate their containers, they may choose to do so by working with the hauler to develop a fee structure for repeat offenders. Jurisdictions may prioritize educating generators on properly separating materials into the appropriate containers and then charging fines to repeat offenders. 14 CCR, Chapter 12, Article 3, Section 18995.4, of the regulations clarify that enforcement for violations through route reviews are addressed through the education and noticing process referenced above.

Notification Examples:

- [Compology In-Dumpster Camera and Automated Alerts](#)
- [Recology Tagging Campaign in San Benito and Postcard](#)
- [Recology OOPS Contamination Tag](#)
- [Waste Management Cart Tag](#)

- [Waste Management Postcard](#)
- [Marysville, Ohio Contamination Notification Program](#)
- [Burrtec Waste Industries Cart Tape Notification](#) (See Page 2)

## Step 6: Maintain Documentation of Compliance with Contamination Minimization Requirements

Jurisdictions are required to comply with the following recordkeeping for container contamination minimization [see 14 CCR Chapter 12, Article 3, Section 18984.6]:

- A description of the jurisdiction’s process for determining the level of container contamination (e.g., route reviews or waste evaluations).
- Documentation of route reviews performed including:
  - The name or account name of each person or entity
  - A description of the hauler route and the addresses where prohibited container contaminants were found
  - Dates route reviews were conducted
  - Person or persons conducting the action
  - Findings regarding compliance, including educational materials issued
  - Relevant evidence supporting the findings
- Copies of notices issued to generators
- Jurisdictions that observe contamination in a container may dispose of the container’s contents [see 14 CCR, Chapter 12, Article 3, Section 18984.5(b)(2)].

### Electronic Annual Report (EAR) Requirements

If route reviews are being used to meet the container contamination minimization requirements, each jurisdiction shall report the following, relative to its implementation of the contamination monitoring requirements [see 14 CCR Chapter 12, Article 3, Section 18994.2]:

- The number of route reviews conducted for prohibited container contaminants.
- The number of times notices, violations, or targeted education materials were issued to generators for prohibited container contaminants.

An [implementation record tool](#) is available to assist jurisdictions in meeting these requirements.

## Additional Resources

- [Model Franchise Agreement Tool \(Word\)](#)
- [Detailed Implementation Guidance: SB 1383 Organic Waste Collection Service Options](#)
- [Implementation Record Tool](#)
- [SB 1383 Regulations](#)
- [Model Education and Outreach Signage](#)

## Appendix A

Special thanks to the following for their participation in the brief interviews conducted as a part of the research to develop this guidance.

- [Atlas Disposal](#), Dave Sikich, President (commercial service)
- [Recology Sonoma Marin](#), Celia Furber, Waste Zero Manager (commercial and residential services)
- [Specialty Solid Waste and Recycling](#), Tomer Shapira, Customer Service Field Manager (commercial and residential services)
- [Republic Services](#), Charles Helget, Director of Government Affairs (commercial and residential services)
- [Compology](#), Jason Gates, CEO (commercial service)