Guidance: Consolidation Sites and Solid Waste Handling Requirements

This guidance is regarding the solid waste handling requirements for consolidation sites described in <u>Title 14</u>, <u>California Code of Regulations (CCR)</u>, <u>Section 17409.5.10</u>. Additional information about consolidation sites is available on the <u>Solid Waste Facilities SB 1383 Q&A webpage</u>.

What is a consolidation site?

"Consolidation Sites" [Section 17402 (a)(0.5)] are solid waste facilities or operations that:

- Receive solid waste for the purpose of storing the waste prior to transfer directly from one container to another or from one vehicle to another for transport, and
- Do not conduct processing activities on any incoming streams.

"Processing" [Title 14 Section 17402 (a)(20)] is the controlled separation, recovery, volume reduction, conversion, or recycling of solid waste including, but not limited to, organized, manual, automated, or mechanical sorting, the use of vehicles for spreading of waste for the purpose of recovery, and/or includes the use of conveyor belts, sorting lines or volume reduction equipment.

Some examples of consolidation sites include: limited volume transfer operations, sealed container transfer operations, and direct transfer facilities.

What are the requirements for consolidation sites?

The organic waste handling requirements for a consolidation site are described in Section 17409.5.10. A consolidation site:

Does not have to perform measurements on source separated organic waste
streams (SSO), mixed waste organic streams (MO) and gray container waste
streams (Not subject to the measurement, recordkeeping and reporting
requirements in <u>Sections 17409.5.1-5.9</u> and <u>17414.2</u>)
Shall keep SSO streams separate from other solid waste streams
Shall transport material that are subject to measurements (MO and SSO) to a
transfer/processing facility or operation that complies with Section 17409.5.1 (i.e.
performs measurements).

Common Scenarios - Is this a consolidation site?

Scenario 1: No material processing at the facility/operation.

If all incoming streams of material are being transferred through the facility/operation without any processing <u>and</u> all the SSO and MO material passing through the facility/operation is transferred only to another transfer/processor that is performing

measurements, then that facility/operation would be considered a consolidation site (Figure 1).

If any processing of incoming material is conducted, <u>or</u> if the SSO and MO material is transferred anywhere else besides another transfer/processor(s) performing measurements, then the facility/operation is not a consolidation site.

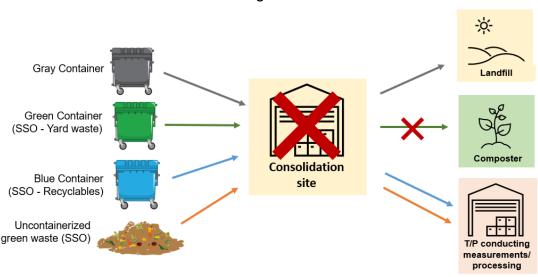
Figure 1 Gray No processing of Landfill Container any streams Green Container (SSO - Yard waste) Blue Container Consolidation T/P conducting (SSO - Recyclables) site measurements Other SSO or MO waste streams (uncontainerized green waste, etc.) Non-SSO & Non-MO waste streams (tires, mattresses, Specialty Processors scrap metal, etc.) (or any destination)

Scenario 2(a): No material processing and transferring SSO green material to organic recovery activity.

If the facility/operation does not perform any processing but chooses to send MO and SSO material to a destination other than a transfer/processing facility or operation that complies with Section 17409.5.1, then the facility/operation is **not** a consolidation site. The facility/operation must comply with the applicable measurement, recordkeeping, and reporting requirements.

Figure 2 (below) shows a facility/operation that does not conduct any processing and has kept all streams separate. The MO material and SSO blue container material is separately consolidated and transferred to a compliant transfer/processing facility or operation. The gray container stream is sent directly to a landfill for disposal. The SSO green material is sent to a composting operation. In this case, since the SSO green material is sent to a destination other than a compliant transfer/processing facility or operation, then the transfer/processor is **not** a consolidation site.

Figure 2



Scenario 2(b): No material processing and transferring SSO green material to organic recovery activity.

It may be possible for the facility/operation to separate out their processing activity from their consolidation site if such a change is approved by the local enforcement agency (EA).

By separating their processing activity from their consolidation site, the facility/operation would be recognizing each activity as distinct and independent from each other. As such, each activity would be required to comply with their applicable state minimum operating standards. The separation of these activities must be clearly delineated, which may include the use of physical barriers or other design changes and reflected as separate activities within the existing permit or by obtaining a separate permit or EA notification (as determined by the EA).

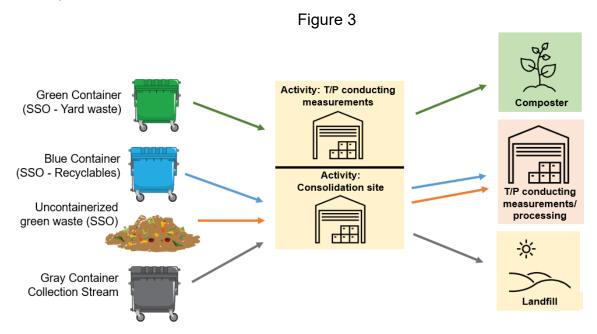
The operator must consult with the EA to determine if this approach is suitable for their facility/operation prior to implementing such design or operational changes.

As an example, the facility shown in Figure 3 (below) could be separated into two distinct and independent activities:

1) A consolidation site, consisting of the SSO blue container stream and SSO uncontainerized green waste stream, which is not processing the materials. The site then sends those materials to a transfer/processing facility that complies with Section 17409.5.1. The gray container collection stream is also part of the consolidation site, as this stream can be sent directly to landfill for disposal. This

separate and distinct consolidation site would not be subject to the measurement, recordkeeping, and report requirements.

2) A processing activity consisting of the SSO green material that sends those materials to a composting operation. This separate and distinct processing activity will perform the required measurement, recordkeeping, and reporting requirements.



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