



Statewide Illegal Dumping Technical Advisory Committee (IDTAC) Meeting Notes

Wednesday, June 5, 2024 12:30-4:00pm PST

Location: Remote Chat: [Zoom Chat Log](#)

Platform: Zoom Streaming was also offered.

Meeting Materials: [IDTAC Google Drive](#)

Agenda Item 1: Introduction

IDTAC Chair, Larry Sweetser, calls meeting to order welcoming attendees, directs individuals to introduce themselves in the chat, provides a refresher of the ad hoc committee ([IDTAC overview](#)), goes over housekeeping—currently recorded for note taking purposes only—“may” start to reconsider (with permission). Meetings may be subject to public records request act.

The IDTAC strategy to help combat illegal dumping is “PACE” Prevention, Abatement, Cleanup, Enforcement. Sometimes referred to as “PACE(O)” to incorporate the outreach/education component.

- Recognize [3E’s Strategy](#) “Education, Eradication, Enforcement”

Agenda Item 2: Summary of Previous Meeting

Feb 21, 2023 ([Meeting Notes](#)) – IDTAC Business update, Earth day/Earth month events, initial Abandoned Vehicles Project Plan, and began Addressing the Abandoned Vehicles Issue through a potential niche prevention strategy applicable to certain automobiles that may otherwise be dumped/abandoned by understanding Bureau of Automotive Repair (BAR) role and presentation around applicable Consumer Assistance Programs. Department of Toxic Substances Control (DTSC) clarified role re abandoned vehicles (which is generally limited) and their relationship regarding dismantling. Routine partner, member, and subcommittee updates.

A public participant shared/raised issue happening on a local level—IDTAC welcomes assisting when able/appropriate & continues to follow-up on inquires.

Agenda Item 3: IDTAC Business

General updates: continues to take on focused/hot topics which the Abandoned Vehicle Project was born from and has grown rather extensive. Project generally wrapping up, but continued information and updates welcome as the project will remain a valuable resource.

Events: Placeholder to share “illegal dumping” related events, other happenings of interest, and a way to prevent scheduling conflicts.

- California Resource Recovery Association (CRRA) [Conference](#) Aug 18-21, 2024 – Anaheim, CA
- Code Conference Nov 12-14, 2024 – Long Beach, CA ([CACEO](#))

Share others: IllegalDumping@CalRecycle.ca.gov

Agenda Item 4: Abandonment Vehicles Presentations/Discussion

Recap: IDTAC examined difficulties, regulations, and management of materials, especially from the RVs. This topic highlights how difficult and very expensive abandoned vehicles are to deal with, and there's a lot of issues wrapped into this theme like pollution, liability, and homeless encampments, with not a lot of funding available.

Compassion does go out to individuals in this circumstance who wish their situation different. Although the project will never be completely finished, today's presentations touch on elements not yet addressed directly.

BeautifySJ – RV Bio-waste Pollution Prevention Program (RVP3)

Presentation: Seth Turner, Community Services Supervisor - Parks, Recreation and Neighborhood Services Department. Worked at City of San Jose since 1999; first in redevelopment, then airport services, and now on types of projects like this one.

Bio-waste from RVs impact city atmosphere, residences, leave stains and affects the environment—City Council approved this pilot program November 2022.

Slide 2: BeautifySJ offers services such as graffiti removal, litter & illegal dumping beautification, dumpster days, vehicle blight, clean city gateways, and grants for trash removal (homeless encampments included). They're also responsible for the innovative Cash for Trash program.

Slide 3: RVP3 program = safe removal of discharge and human waste from recreational vehicles and other lived-in vehicles throughout the city, not just certain locations. Sometimes the team is referred to as "Pollution Preventors" as these volumes captured would otherwise be illegally disposed. Whether you're with a big or small city, imagine anyone could benefit from an opportunity like this given the level of concern.

Pilot started by servicing 150 vehicles every 4-6 weeks—goal met. The numbers/incidences continue to rise, and it seems the entire city continues to become more and more affected. Since its inception, zero liabilities/issues/incidents have happened.

The program entails other/outside vendors and rather specialized equipment.

Turner was not involved in initial start-up discussions but trusted to carryout efforts. Relationship building (with all) and communication (with all) is key to the program's success and was an initial focus. Compiling Standard Operating Procedures was another initial step as well as surveying the situation and ensuring everyone was in sync with their talking points, service, and how they conducted cleanup. Kick-off included meeting with other city community coordinators who already had knowledge/history of sites. In conjunction, the team also started by driving around and doing assessments, which over time morphed into a dashboard.

Slide 6: Dashboard Tool tracks all types of data & pics as each case may be unique. Worked with the GIS Team to create an efficient and customized tool which includes admin support, invoicing capabilities, and more. When building the dashboard Turner referenced the program/service contract to ensure the scope remained within limits and any discrepancies could be immediately acknowledged before the dashboard was finalized.

Slide 7: Admin & Operational Plan (specs), Launch & Initial Assessments, and Process Improvements to Maximize Results.

- Start-up also entailed monthly meetings to capture efficiencies & feedback from group, like learning that distributing bags/buckets during the beginning of week with pick-up/service the following days was more efficient.
- Trainings have included: traffic control, de-escalation, workplace violence, customer service.
- Personal protective equipment (PPE), etc. key especially in this type of work.
- Since the work is conducted publicly, it's important to be mindful that individuals can be unpredictable and may even want to record/video – this goes both ways.
- Reminder: it takes a decent amount of time to service a complaint.

Top goals: site cleanliness, communication, and tracking.

Slide 5: provides Definitions/background terms (black/grey water, removal & disposal, incident, RV/LIV) and lists the program's Goals & Value-Added Services. Some highlights include the program being adaptable enough to respond to emergency/urgent issues. Additionally, the program is a relationship building tool and often the first point-of-contact dwellers/unhoused have with local government.

- Dwellers will listen/are receptive to good neighbor policies, potential resources, and become more amicable to adhering to more appropriate locations for them to relocate. Since this service is free, many seem to be more receptive. Relationships with dwellers have resulted in cleaner community spaces.
- Bilingual services ease communication.
- City staff does communication first, then the team communicates to dwellers about their current bio-waste practices which often involve improper use of storm drains.

The team has dwellers handle "spigots" directly instead—providing them any needed material/PPE and indicating how to handle/dispose properly. The Team asks questions as well to gauge what other future services may be needed.

Operations continue to be assessed, surveyed (slide 4), and streamlined whether that involves equipment upgrades or how to handle encounters (i.e. hazards, dogs, etc.).

- Similar meetings w/ city community coordinators remain and help prioritize sites.
- Volumes collected range in amount, but the team continues to plan routes (~daily) so all needed locations get serviced in allotted time, or moved to the next day and adjustments made accordingly.
- Currently experimenting with vacuum trucks and what opportunity they can provide.
- The team is mindful to lookout for other issues that can be referred to other departments.

The public now seems to be aware of these services so new reports may be able to be woven in pending capacity. Believe a 2-week timeframe slotted. Double-check with Turner if interested. Online concerns/complaints are also becoming folded in.

Slide 10: Pilot Program Outcomes & Next Steps – able to manage with just one assessment day a week. Slide show some specs – contact Turner if interested in more exact numbers/amounts/lbs. Turner continues to conduct drive thrus monthly to see how things are going.

With program expansion on the horizon, creating additional awareness likely key with those such as businesses, neighborhood associations, and residents—those closest by to continue to make interactions/services positive. Some may not know the severity of the issue, that this program exists, and that the city has stepped up on this matter. On the flipside, actively promoting the program to dwellers may be of interest—follow-up may be needed.

Chair: impressive, innovative, and effective program and that sometimes these cases could be seen as hazardous waste superfund sites, so it's refreshing local supervisors are championing the issue. Seems like you have it handled. Supervisor Miley Says you need a chant/local champion to get ball rolling. The presentation is transferable to different communities even if the political support isn't there.

See Q&A in the [chat](#) which include thoughts regarding the overall plan – to find long term solutions and not just shift the problem down the road, and that rural areas may too apply.

Uncertain exactly where RVs are coming from and if some have come to city because of the program, however the dashboard can track information like this and they've found a decent number of RVs tend to move around.

Stormwater Permits ([past IDTAC notes](#)) also a key driver for reasons to pursue the program.

Questions/contact welcome (see [presentation](#)).

City of Los Angeles / LASAN Livability Services Division – Vehicle (RV) Dwelling Response Program Presentation: Howard Wong, Chief Environmental Compliance Inspector II—in role for a couple years. Prior, was in watershed protection for +20 years—experience with site facility inspections re stormwater, and emergency response & illegal dumping investigations.

Wong operates the Livability Services Division within the Bureau of Sanitization (LASAN) where their main function is to protect public health and the environment. The division operates 4 programs—also see slide 2: CARE Program (*Cleaning and Rapid Engagement Team*) including encampments on public right of ways and illegal dumping with RV Dwelling Task Force. Other programs: Public Street Receptacles (litter), Altered-Shift Program (extends services especially for illegal dumping to 16 hours, every day), and Mobile Hygiene Program.

Slide 3: The CARE/[CARE+] Program is essentially run by the Mayor, Council Members & Board of Public Works (appointed) with a budget of \$74M and 349 positions (w/ some vacancies)—additional/exact #s contact Wong. CARE currently services ~8,200 locations for encampment cleanups. The program's primary mission is to deliver services to the individuals experiencing homelessness within their service areas.

LASAN was designated the Admin Agency [LA MC (Municipal Code) 56.11] to regulate any personal property disposed, left, or stored in public right of way areas—homeless encampments apply. CARE services include citywide encampment cleanups (compliance included), spot cleaning services, identify health/safety hazards within public right-of-way, sanitation (like pressure wash), and serve as support to other city departments—including the RV Solutions TF.

Slide 4: CARE+ Team have a larger footprint to address dense homeless encampments and or to provide support to partnering Departments.

RV cleanup usually requires posting of notice (between 24-72 hours) on vehicle prior—exceptions may be plausible for immediate dangers like life, health, hazards, ADA, ingress and egress, etc. In 2023 over 7K tons collected, including over half hazardous waste, which was usually from homeless encampments or other related responses. Typical hazardous waste found in RVs are sewage tanks, gray water tanks, propane containers, petroleum products, household hazardous waste, etc. Teams' service cost per day is between \$8-\$10K which includes disposal/transportation costs, and HHW—enviro cleanup contractor (manifest, transport, disposal).

Slide 5: RV Dwelling Response Program (background/summary)—nothing new to the city in that dealing with RVs has always been on their radar for 20+ years in various areas of the city. Different RVs have come and gone. LAMC 85.02 not currently in use, but when it was active it limited vehicles used for dwellings by restricting them to city streets on certain hours, not to be parked on residential streets, and not to be within a 500ft radius of a park, licensed school, and pre-school/daycare facility. An internal map came to fruition of where RVs could legally park, which was basically commercial industrial areas outside of residential streets and/or within a school/park. So certain areas and times ~designated RV living situations, in conjunction with other laws enforced by police, transportation, parking, etc., which went on for around 3 years.

In response to the 2020 pandemic, a declared local emergency by the city, meant relaxed enforcement for encampment cleanups, parking violations and impoundments of vehicle dwellings, though spot cleanings/sanitation generally continued—still aimed to outreach/notify those living in the public right-of-way as a heads up. Enforcement operations were only conducted on limited/exceptional basis, if warranted.

In April 2022 the City Council approved the City Administrative Officer's (CAO) to coordinate vehicle dwelling outreach and engagement protocols—essentially guidelines to assist with next steps. See slide for more info.

- Internal Standard Operating Procedures to get everyone on same page, similar notion to PACE(O) Strategy.

Slide 6: RV Dwelling Response Program continues/enforcement resumes, but Wong notes it's a progressive enforcement practice—slow progression/enforcement leading up to a specific date/time “choice date”—all entities agree to this for when the impoundment operation takes place. The outreach service providers to have engaged at least 3 times (re things like support services, cleanup) and build rapport.

Slide 7: Vehicle Dwelling Operations - status reports/numbers. This effort included coordination with tow/impound yards, official police garages (OPG), which are led by LA PD, Commissioners Investigation Division which track reports daily of how many spots are available for impounds of RVs (these slots range citywide). Sometimes operations were postponed due to lack of storage or the recycler—not able to dismantle. Space was an issue for first year & half operations. Thus, when the RV processing process is inadequate, “cleanup” becomes halted.

Coordinating with Outreach Service Providers also key part of the efforts as available shelters, motel vouchers, etc. need to be lined up. Various elements/entities contribute to the metrics shown on slide. Storing of personal property (especially from RVs) has increased from say 15-20 years ago since today many more dwellers are more permanently occupying vehicles. Obligated to store personal property that's in excess around vehicle (in public right-of-way). Usually have the capacity for storage (90-day requirement) in case those interested in coming back to claim it.

Slide 8: RV Solutions Task Force - CAO generally directed this effort until Mayor started a RV Solutions Task Force and a best way to address homeless encampments while keeping aligned with BOS recommendations through the CAO's office—everything generally ended up lining up. See slide for members, purpose, and full goals & highlights—some efforts are working and others continue to be tweaked. Estimated 4,000 RVs improperly present in the city.

- Expand Safe Parking model to provide more options for RV's – City of LA currently has 13 Safe Parking Sites – one of those allows RVs (if their waste tanks, etc. are non-operable).
- Incentive program for voluntary relinquishments for (disposal/dismantling) – in the works. May include a voucher and potentially streamlining DMV's lienholder & auction requirements.
- Identify sites for storage and safe-parking options. For example, OPGs have specific requirements like zoning laws, that the facility have non-pervious asphalt, and a fencing/security baseline. Recently new locations identified—an ongoing goal.
- Dismantling program to prevent the cycle of RVs back on the street, note Council File (CF) - [CF No. 22-1324](#). “Vanlords” - purchase RVs at auction and rent out as housing. Perhaps provide OPGs with an incentive aiding recovery costs (dismantling).

- Identify recommendations for appropriate interim shelter and housing—without this, the cycle continues. Note: at the time of presentation, no law prohibits living on the public right of way, though as aforementioned other/certain violations may be enforced.
- Explore legal issues related to rentals, relinquishment and dismantling—pieces in place to help ensure inhabitable RVs don't have ability to resurface / ~be habited. Ordinance may be in the works.
- Provide solutions to increase towing capacity. Raising the \$500 "junk" value threshold for potential dismantling in place which would free up storage.
- Continual relationship/engagement w/ service providers for case management & housing navigation services.
- Continue to capture best practices

Slide 9: Lessons Learned/Additional Resources - LASAN operating/division budget around \$67M, but that includes various sanitation services across the board—blanketed by general fund.

What Works (also note slide) - ensuring proper authority for steps—legal council is available to help determine this. Engagement outreach can be a challenge, so rely on internal and voluntary groups, especially those who know the area/individuals, who don't always want open air shelters and to relinquish their RVs. However, those who voluntarily do—extremely helpful in the process. Ensuring environmental contractors—that this service is available and onsite has been helpful. Prior surveys and photographs of the situation is also helpful to plan/diagnosis ahead of time. Plan coordinated effort in advance, especially with notices/citations.

- Form 462 has been helpful offering the ability to dismantle onsite (environmental impact weighed).

Free RV Disposal Sites available throughout the City—alternative to gas station options which charge. Coupons available to share with individuals.

Community Caretaking violations can mean immediate tow (leaking RVs, fires) & help prioritize (pending resources available).

Challenges - Personal property located on top of the RV. Proof of vehicle ownership—City Attorney office been on board and work with DMV. Request for operations with limited City resources and/or funding—more requests than resources available so work with Districts on prioritization. Tow company refuse to impound vehicle with waste sewer tank—connecting towers w/ City's free disposal sites can help assist w/ costs for company. Limited land / property parcels for storage and or Safe Parking options—various hurdles experienced like "NIMBY".

Slides 10-11: Picture examples - LASAN helps make incidents/RVs roadworthy so they can continue along the next stage in the process (storage, disposal, etc.). A camper top is seen more as serialized property and handled more like a standard illegal dumping complaint. RV pictured w/ personal property on top and all around it—towers won't touch this "stuff", so coordination is needed (w/ CAO)—property on top likely stays with tow whereas surrounding property goes in storage 90 days. Sometimes "stuff" around the RV not associated with the dweller, as residents will dump around RVs assuming services are coming soon to conduct removal/cleanup. Picture shows a 20 ft RV towing an additional trailer—presurvey/pics submitted in advance helpful to prep what equipment is needed for removal.

Questions/contact welcome (see [presentation](#)/chat).

Q&A

Chair: Appreciates both presentations and mentions what one jurisdiction did regarding RV storage – using their landfill facility pending processing (they have protection for the fluids).

Pardo (in chat): curious if tow companies having difficulties securing new trucks (Advanced Clean Trucks/Advanced Clean Fleets). Chair: new standard may be applicable to proposals/work contracts. Wong: No, not the admissions for OPGs/impound yards but yes for trash trucks, fleet/inspector vehicles, etc. moving toward natural gas/electric.

Q - Types of hazardous wastes removed? Wong: All [9 DOT classes](#), like sewage tank spills, feces, propane, aerosols, flammable liquid. Reminder \$13M contract annually for this.

Facilitator: How often are the Task Force/Working Group Meetings? And, remind the group your experience again. Wong: Meetings now quarterly given a lot of process(es) having been worked out in initial stages. Been working on this/related content for 20+ years, and seen/dealt w/ many components, scenarios, etc.

Chair: Thoroughly appreciates presenters' time & content to help move the needle!

IDTAC Abandoned Vehicles Project Plan Update ([focus on slides 6, 7 & 8](#))

Agenda Item 5: Recap - Annual Statewide Illegal Dumping Conference

Organizer: Alameda County/Illegal Dumping Task Force (Supervisor Miley)

Chair: Quite an incredible job and have not forgotten the need to make this a statewide effort—immensely appreciative of the work you've done carrying this torch the last 4 years and setting such a high bar! Glad IDTAC work was able to be shared at sessions.

- [Post Conference Website](#) (presentations, videos, bios) available, #IDCon24

Armstrong: Working on internal conference report too which includes budget, attendance, evaluations, etc. There was an interactive session this year, so want to capture/share that feedback too.

For "IDCon25" still very interested in partnering with other jurisdictions and agencies from across the state. Big lift but possible and done on a pretty lean budget. Erin/Team is interested in sharing that expertise and helping build the capacity statewide. Congratulations on the Supervisor's reelection but it's mentioned he's likely considering retiring after the term so what are next steps? It's really important to partner/connect with other jurisdictions to pass on lessons learned and the tools they have used.

Unique statewide event for the illegal dumping community to come together for lessons learned, best practices, collaboration, and share what they're doing—key piece of puzzle to address illegal dumping. Illegal Dumping Task Force Team has been helpful.

Chair: Understand, agree, and know people are pushing for that statewide effort and have been.

Contact Erin Armstrong Qs, inquires: erin.armstrong@acgov.org

Agenda Item 6: [Illegal Disposal Sites](#) Presentation/Discussion

Chair: during IDTAC meetings, through inquires and during the conference (IDCon24), the issue of larger illegal disposal sites continues to get exposed. These incidents may involve a different set of participants in your community to deal with the issue, so wanted to revisit these types of incidents and the different roles entities may have in addressing these larger sites, like Local Enforcement Agencies (LEA)—what they can/can't do—helping frame expectations.

[Illegal Dumping/Disposal Revisit Presentation](#): Paulina Lawrence, Permitting & Assistance Branch Chief (Waste Permitting, Compliance, and Mitigation Division) from CalRecycle presents. Alvin VoTran, Senior Environmental Scientist assists. Ms. Lawrence reminds the audience how litter and illegal dumping can differ, be categorized as “nuisance”, who from local government usually handles these issues though it can vary by community/jurisdiction, that local government (cleanup) resources are usually directed toward public property, and a reminder that local municipal code/laws/ordinances may be used to conduct enforcement/investigations around these issues. LEAs may be the contact for these types of incidents pending the jurisdiction as some wear multiple hats, but more so regarding when large ‘illegal disposal portions’ are happening—LEAs ‘~required to get involved.

Illegal solid waste disposal site: (common description) is a location that functions or has functioned as an unpermitted/unregulated disposal site with a significant amount of disposal. [Title 27 Environmental Protection Division 2 Solid Waste § 20164. Combined CalRecycle & SWRCB Technical Definitions](#) “illegal site”: a disposal site that is not permitted and not exempt from obtaining a permit and is not closed or excluded from the requirement to obtain a SWFP (Solid Waste Facilities Permit). Illegal disposal sites are typically larger than illegal dumping locations and pose a more significant threat to public health and safety, and the environment. LEAs are responsible for inspecting and enforcing solid waste sites, disposal sites, whether they're legal or illegal.

- “Characteristics of an Illegal Disposal Site” (specifics on slide 4 too)

When illegal dumping events grow into what may be considered an illegal disposal site—the LEA is then usually the primary entity to handle these circumstances. Having already established and maintained (local) relationships among various entities with a role in illegal dumping/disposal really aids crackdown/investigation (i.e. Local/Code/Law Enforcement relationships).

Agencies get alerted of illegal dumping/disposal issues & concerns a variety of ways, other times these circumstances may be found during routine patrols. Slide 5 lists helpful components of complaints for initial site visits/investigations that help gauge/classify the situation to aid... next steps and what determination/responsibility looks like.

Illegal disposal sites have burdened CA for years, but recently LEAs and others believe cases are rising. Certain types of illegal disposal sites seem to be on the rise and contain large amounts of material categorized as “compostable”, “construction & demolition” and “mixed green”. When these material types are contaminated & mixed it's a good indication the site is improperly operating and/or is illegal.

- “Construction & Demolition” can't be land applied
- Agricultural and (large) open areas susceptible to this behavior
- Some sites span multiple jurisdictional/community boundaries so coordinated efforts needed (as many different entities likely to be involved).

Sites can vary in size, frequency of dumping, pile(s) depth and type of material/contaminants dumped. The picture (slide 3) shows a site w/ compostable

material such as green waste & food waste spread over the land, which can be done legally if adhering to certain requirements (noting only certain designated zoning types allow this activity unless exceptions granted/available, etc.).

Slide 6 [Land Application](#)—([Title 14 CCR Section 17852\(a\)\(24.5\)](#)) “The final deposition of compostable material and/or digestate spread on any land, including land zoned only for agricultural uses, under the following conditions...” These sites may look like illegal disposal sites on the onset.

- If Title 14 section above isn't met, it's illegal.
- As handling of organics material recently officially changed within the last couple years ([~SB 1383](#)), land application operations likely to increase. Flagging improper land application operations will be key.
- The LEA's role is to determine whether the final disposition of waste at a site is legal/illegal (may not be obvious for a “land application” site). Determination can be asking questions pertaining to Title 14.
 - California Department of Food and Agriculture (CDFA) and Regional Water Quality Control Board (RWQCB) may also have a part/be able to assist.

Ward: There is a site where finished compost accumulated (prior to SB 1383) and the surface topography has been a point of contention. Since there was no survey to demonstrate the baseline, definitions/opinions ensued about compost thickness—financial liabilities associated with this issue/site. Guidance around this could be helpful since similar sites and situations likely exist/forthcoming. Ms. Lawrence: Appreciates comment and plans to check with CDFA for recommendations.

Construction & Demolition Material (C&D)

- Compostable material that's been separated from C&D material prior to the receipt by the landowner can be applied as long as it meets the definition of land application (above). If it doesn't, it's illegal disposal of solid waste.

In summary, for cases not seemingly straightforward, it's dependent on the landowner to prove what type of material they're receiving. Thus, if the landowner is receiving material that's been separated prior that did contain C&D—they need to provide proof to the LEA.

Comment: Shouldn't legal operators take steps to identify their legitimacy (for the public, etc.) when able. Are there guidelines around this?

Note: Statewide management of all non-hazardous waste is found in California Code of Regulations Title 14 (Natural Resources), Title 27 (Environmental Protection), and Public Resources Codes (PRC).

Slide 7 [LEA's Authority & Oversight](#) – this slide is a potential basis for an Enforcement (EPP) Program Plan, while being mindful that each community many have additional/different specifications. This structure also provides the authority/building blocks to enforce/investigate.

- LEA's have different authority/oversite for different portions of Title 14 Regulations and may have different enforcement authority than other stakeholders you interact with in the illegal dumping/disposal sphere who obtain their enforcement through other codes.

- LEA's are designated by the governing body of a county or city. Once designated, they are then certified by CalRecycle and empowered to implement delegated CalRecycle programs & locally designated activities.
- LEA's have the primary responsibility for ensuring the correct operation and closure of solid waste facilities in the state. In other words, an illegal disposal site is not operating correctly and must be addressed.
- LEA's also have the responsibility of guaranteeing the proper storage and transportation of solid waste.
- How an LEA to go about doing an *investigation*; see PRC 44100 & 44101 & [title 14 CCR Section 18303](#):
 - For the most part, LEAs shall conduct investigations of allegations by complaint review and investigation initiation procedure.
 - LEA's to conduct investigations of all disposal sites, facilities, and operations where there is reason to believe violations exist.
 - LEA shall conduct periodic investigations as it deems necessary to ensure compliance with all related solid waste laws and regulations.
 - In any investigation of possible violation of a health-related standard, the LEA, if not the local health department, shall consult as appropriately together.
 - LEA investigations - shall be conducted in accordance with their EPP, include requirements in [subsection \(C\)](#), and have records for each.
- *Unpermitted Solid Waste Site Regulations* – when the LEA deems appropriate or when required by statute...
 - Notices and Orders ([14 CCR Section 18304](#) & [Section 18304.1](#))
 - Corrective Action Order
 - Cease and Desist Order
 - Compliance Order
 - Mandated Enforcement Activity [14 CCR Section 18304.3](#) – LEA shall take the following actions for specific violations or situations...
 - A certain date for cleanup could work (aka compliance order).
 - Example: LEA has discretion on what mechanism (~above) will help that particular parcel or portion of it be compliant with standards (see below).

Slide 8 *Appropriate and Suggested Actions for an Illegal Disposal Site*

- LEAs must investigate and inspect illegal disposal sites:
 - Enforce state minimum standards
 - Inspections and enforcement actions should be assigned a Solid Waste Information System (SWIS) number – this to also help organize/build their case should increased enforcement be needed.
- Expectations
 - Pursuing enforcement should mean an immediate response from the parties.
 - Cases can vary and there may be a variety of steps, which often result in different remediation needs.
 - If the site is not remediated by the responsible party, the LEA should pursue further enforcement and/or coordinate with other enforcement agencies to require the site to be cleaned up.
 - Upon request, CalRecycle can assist with the inspection and enforcement process, answer questions, and provide guidance and resources such as providing investigations, and remediation work plans.

Slide 9 *Unpermitted Solid Waste Activities* – As mentioned, IDTAC/CalRecycle received inquiries on illegal disposal activities that may be related to other types of unpermitted solid waste activities. These activities generally fall outside of the land application and illegal disposal site scope.

- Construction and Demolition and Inert Debris (CDI) Processing Operation/Facility
 - 14 CCR Article 5.9 Section 17380 – 17386
- CDI Disposal Operation/Facility
 - 14 CCR Article 5.95 Section 17387 - 17390
- Chipping and Grinding Operation/Facility
 - 14 CCR Section 17862.1 (Composting regulations)
 - 14 CCR Section 17383.1, 17383.3, 18823 & 18823.5 (CDI regulations)
 - 14 CCR Article 6.0 Transfer/Processing Operation/Facilities Regulations

LEAs to use these corresponding regulatory sections within their authority to ensure sites meet the criteria of each type of activity identified is being adhered to correctly (storing handling, transporting, etc.). And, if closure is pursued, it's to be enforced under the authority of the LEA.

CalRecycle's Permitting & Assistance Branch, Solid Waste Evaluation & Enforcement Branch w/ inspectors and Engineering Services Branch [available](#) and may be looped in on these cases.

Disclaimer (for LEAs): Although these notes have been approved for accuracy, consider referring to more formal guidance/documentation – thank you for your work!

Chair: Appreciates presentation. Wanted this info to be revisited/available as a reminder that when a large illegal dumping site gets flagged – contact the local LEA to assess and determine if the site is an illegal disposal site and if so, what steps are needed. Sometimes the line can be gray between what is a large illegal dumping area vs an actual illegal disposal site. Each community's LEA may have varying degrees of authority on matters, so again, local partnerships key. Any hazardous waste present/(obvious) also complicates things. As the statewide goal of diverting organics continues, some sham recycling may proliferate, so the land application detail/technical piece really helpful.

LEAs have ongoing regional seasonal roundtables, which has been key for communicating on matters such as this.

Trevor Anderson from CalEPA is tapped for any quick update: we continue to coordinate w/ Fresno and Kern regions—their local environmental health and waste departments, etc. These counties, like many, face illegal disposal site issues (see Fresno County [IDCon23](#) example). Shyenne Lewis (CalRecycle EJ Liaison) coordinating re potential assistance from the Local Conservation Corps (CA Conservation Corps?) should they be a new/additional resource. Chat comment: Corps may not be available in certain areas of the state. IDTAC/Facilitator to share this concern. Chair: reminds and acknowledges illegal dumping incidents can quickly affect and involve other entities that steward water, air, and hazardous waste management, which are all under the umbrella of CalEPA.

Ben Lucha & Charles Bostwick share examples of larger illegal dumping/disposal sites in the City of Palmdale/Antelope Valley, high desert area of LA County. Lots of open space leaves room for unpermitted/unauthorized type landfills that may include activities like mulch and illegal recycling. One property owner decided to accept compensation for dirt, however after a while truckloads of it continued to proliferate, being an improper operation in no time. Initial decisions like this seem harmless to some

landowners, however legal ramifications can often come up, especially if the incident causes a more severe environmental impact. In some incidents where landowners own lots of property, they don't always know it's happening until it's too late—cleanups of these sizes are very costly.

Facilitator: Appreciate seeing images & hearing stories firsthand. May want additional examples in the future and those on the call welcome to share their issues/present at a future time (pending any interim confidentiality clauses).

Chair: Appreciates & readdresses the chat—that incidents need to be caught, applied and detected and there is usually standards available to help identify, assess, and enforce on this.

Agenda Item 7: Discussion/Inquires/Check-in

IDTAC Members, Participants

Ward: Strategies Subcommittee Chair urges group to keep the IDTAC in mind as a resource, share issues your community is having, and that the current dynamics of the group relies on assisting/problem solving/creating awareness, and that we're hear anytime.

Inquiry: Chad San Juan from Kern County EH shares issues with illegally dumped hand sanitizer – [slide](#) with pictures and contact info (SanJuanC@KernCounty.com).

Chair: This is considered a hazardous waste given the alcohol content and other factors which usually raises the bar on enforcement.

Ables (DTSC Criminal Investigations Unit): We're starting the process of looking into these types of situations more—a similar inquiry in a different area came in yesterday.

Vice Chair: Worked during COVID on cases like this in LA City & County w/ the CUPA given hand sanitizer was initially in demand. After demand decreased, many were looking to get rid of it and likely just couldn't figure out what to do with it. Some hand sanitizers were even contaminated (with benzene?). Some cases were criminal schemes trying to sell it to Mexico—hundred to thousands of pallets.

Focused Topic(s)

Facilitator: Abandoned Vehicles Project generally coming to an end. Will readdress the project again after the meeting concludes and notes are captured. Notes Agenda Item E likely slotted as a next direction, as well as the illegal disposal site predicament facing many throughout the state. Appreciates Ward's comment urging participants to communicate priorities.

[Past CSAC/CalCities Survey](#) – if interested in conducting a newer/similar survey, please advise.

Agenda Item 8: Legislation and Regulation

Chair: There is some movement around solid waste pollution/dumping matters, but nothing to be shared today—follow-up slotted.

Ward: [AB 2902 Organic waste: reduction regulations: exemptions](#). Language added includes the ability to enforce illegal dumping for someone hauling materials clearly destined for disposal in a direction that doesn't make sense for disposal. This would be a pretty big shift from what's available now. Drivers with loads traveling on rural roads (that have no outlet... for proper disposal) would potentially be able to be pulled over/considered suspect. If passed, ability to question the driver/circumstance and ticket likely available (this applicable to drivers with full loads—prevention tactic instead of

after the fact/empty loads and/or having to witness the dumping). Note: [SB 1359 Illegal dumping](#). too.

Agenda Item 9: Updates/Resources

A: Caltrans' [Clean California Program](#)

Chair & Facilitator: Appreciates their work and what they provided to the group throughout the years. February IDTAC Meeting and Illegal Dumping Conference provides a current update on the initiative. Chair: Reminds audience that there was a push with funding provided for Caltrans Clean California program to initiate a series of efforts from cleanups to education to beautification efforts/programs. IDTAC worked with them on some of that—they did a good job with a lot of content to cover. Due to budget constraints the program was curtailed and has since transformed into education efforts. We're hoping they'll still continue to be part of our program as before. We worked with them a bit on a transition message. Programs are still available locally for people to get rid of their "stuff" properly – so ensuring guidance around this important—one less reason to illegally dump.

Keep California Beautiful (KCB) assisted with these efforts and reminds the group the www.CleanCA.com ~education program continues through June 2025. These efforts offer a "Community Designation Program", ability to showcase local happenings, and network. Later in June KCB is providing funding for 15 sites statewide to look at different types of litter interventions—reach out for questions and if interested—residual funds may still be available—[past message](#).

B: Mattress Recycling Council (MRC)

IDCon24 Interactive Session—MRC collaborated with Gigantic Idea Studio to host this session taking advantage of the spectrum of expertise and experience from the audience/participants. Goal was to explore how to overcome technical, legal and operational barriers so that enforcement, eradication and education efforts could generally work together. There were 3 prompts which will be transcribed and compiled into a report. Presentation on this forthcoming at the Task Force or potentially an IDTAC Meeting.

MRC Program reminder: "illegally dumped mattress collection initiative" available and assists with proper mattress disposal—variety of entities can participate by reporting their illegally dumped mattresses for reimbursement (\$15-\$20 each). Initiative may offset other costs. Program about 7-8 years old and shows numbers where dumping has decreased in different communities.

C: CalRecycle [Grants](#)

[Presentation slides](#)

[Solid Waste Disposal and Codisposal Site Cleanup Program](#) – Steve Santa Croce, Supervising Engineer, provides program updates:

- List of current grantees shared on slide, which range in variety statewide—welcome to reach out to Grantees themselves (if that interests you) or the Grant Manager.
- Next round of grant awards announced at upcoming public meeting. Revising some detail in the grant scoring criteria for clarification, but nothing major.
- Waiting for state budget to be finalized to better gauge when the next round of grants will be open.

[Farm and Ranch Solid Waste Cleanup and Abatement Grant Program:](#)

- Grant usually open and available.

- Reach out to the Grant Manager to discuss a case and eligibility—available in advance of application submittal if needed.
- [RCDs](#) great partner/applicant to host a case/grant/project.

Subscribe to [Email Updates](#) for grant announcements/updates.

D: Subcommittees

Subcommittee Updates Slides

In the interest of time and other priorities, subcommittee updates somewhat cut short, however content on the slides echo the updates vocalized by Subcommittee Chairs with additional details.

Strategy Subcommittee – Subcommittee Chair reminds group that concerns/topics continue to be welcome and of the Illegal Dumping Resources Toolbox Facilitators help curate which may help with your certain issues. Discussed and met with Clean CA as the Caltrans initiative transitions—KCB helped clarify and share their overlapping projects. Discussed next IDTAC topics/direction including the Abandoned Vehicles Project and land application, an issue that may potentially proliferate.

Standards Subcommittee – group focusing around the importance/benefit of collecting data, with projects such as the Data/Reporting Tools Comparison Sheet now available and published in draft form. Revisited the Data Collection Form Sample the City of Elk Grove built in collaboration with IDTAC. Conversation around AI in this space.

Enforcement Program Subcommittee – CACEO a guest at the March meeting. Much conversation and work around the Cameras/Surveillance Systems Project (vendor comparison sheet, best practices and a specific Google Groups forum). Reminder from the Subcommittee Chair that footage only may not be enough for prosecution and that having the right evidence and prosecutorial support needed. Thus, (additional) members/co-chair from the prosecutorial side wanted. Scoping regarding the practitioner illegal dumping training (likely through CHMIA). Touched on Abandoned Vehicle Project.

Outreach Subcommittee – group continued to bring outreach/education ideas around the Abandoned Vehicles Project, with some members reviewing the draft document. Ideas around how to best educate and disseminate on a statewide level continue, including how this fits with the Clean CA message and efforts. A repository for educational material likely appreciated and useful to many in the field. Seeking a Subcommittee Chair. The group may take a temporary hiatus.

E: Regional Groups/Task Forces & Local Illegal Dumping Initiatives

- [AB 592](#); commercial nonfranchise solid waste haulers pilot program (Alameda, Contra Costa, Solano)—David Brockbank comes on with a quick update that coordination and multiple iterations are happening behind the scenes. Chair: maybe we'll have you provide a more lengthy update in September.

Agenda Item 9: Next Meeting/Adjourn

Wednesday, September 11, 2024, from 11:30am-2:30pm

Contact

For further information about this meeting, and general questions/comments:

IllegalDumping@calrecycle.ca.gov

Subscribe to the [Illegal Dumping Listserv](#) for email updates, including meeting announcements.

[Illegal Dumping Resources Toolbox](#) (IDTAC/CalRecycle)

Meeting Attendees

Members Attending

Larry Sweetser, Chair

Gonzalo Barriga, Vice Chair

Christine Flowers/Cecile Carson, KCB

Erin Armstrong, Alameda County

Gary Harris, City of Los Angeles

Jason Phillippe, CCDEH

Mark Azzouni, CHMIA

Mark DeBie, CalRecycle

Maria Ferdin, Monterey County

Nate Pelczar, CPSC

Olympia Williams/Seth Turner, BeautifySJ

Taylor Grimes/Layla Chamberlin, MRC

Tedd Ward, Del Norte County SWA

Tom Mattson, CEAC

Veronica Pardo, RRCC

Victoria Reiser, NSAC

Members Absent

Avneet Mahil, Manteca, SWANA

Carlos Duque, City of Elk Grove

Eva Mann, City of Richmond

Garen Kazanjian, Recology

Jaron Brandon, Tuolumne County

Jeff Lamoure, CCDEH

Marr Christian, San Bernardino

Nick Lapis, CAW

Rob Hutzel, SD River Park Foundation

Sara Weaver, CCC, Region III

Traci Graves, Public Member

Others Attending/Registered

Alvin VoTran, CalRecycle

Amar Ezeh, Humboldt County

Armando Quintero, Hayward

Bonny Lew, DTSC

Brittany Griffiths, Sac County

Cameron Powers, San Deigo

County/CACEO

Chad San Juan, Kern County

Charles Bostwick, LA County BOS

Chris Huitt, State Lands Commission

David Brockbank, Contra Costa County

David Coscia, LA County PW

Dustin Schiavo, CalRecycle

Dylan Chiu, Contra Costa County

Elvira Delgadillo, LA County

Emin Israfil, Rubbish

Felicia Truong, LA County PH

Gus Gomez, Fresno County

Hayley Wilson, DTSC

Howard Wong, City of LA

Jamie Marcil, San Jose

Japjit Deol, SF PH

Jerry Oser, Inyo County

Kathy Ton, LA County PH

Kelly Ables, DTSC

Ken Habaradas, LA County PH

Kendra Boutros, Santa Clara Valley

Water

Khosrov Matsoyan, Bureau of

Automotive Repair

Kyle Loreto, Merced County RWA

Lakshmi Reddy, Rubbish

Mahdiyeh Kargar, LA County PH

Mandy Brooks, Salinas valley SWA

Mark Moss, El Dorado County

Martin Perez, CalRecycle

Matthew Minson, El Dorado County

Michael Hernandez, Kern County

Nicol Walgen, LA County DA

Norma Campos Bernal, Santa Barabra

County PH

Oscar Gomez, LA County Planning

Paulina Lawrence, CalRecycle

Peter Graves, BLM

Raeida Nakhoul, LA County PH
Ricardo Gordillo, LA County PW
Ryan Farrer, Caltrans (Litter)
Samantha Elliott, Kern County
Seth Wheelock, Tulare County
Shannon Vanella, Siskiyou County
Shyenne Lewis, CalRecycle/CalEPA EJ
Stephanie Becker, CalRecycle/IDTAC

Stephanie Young, CalRecycle
Steve Santa Croce, CalRecycle
Tawny Ho, LA County PH/LEA
Timothy Engle, El Dorado County
Trevor Anderson, CalEPA
Troy Hommerding, Kings County
Zhenzhen Jiang, Santa Clara County

Reminder: [IDTAC Google Drive](#) available – meeting notes, agendas, presentations, and other documents (not maintained by CalRecycle)

Thank you for your dedication to elevating and managing illegal dumping locally and statewide!