

Recycling and Disposal Reporting System (RDRS) Webinar

Part 1: Updates to the RDRS Regulations

Part 2: Existing Reporting Topics

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Agenda

Updates to the RDRS Regulations

Other Reporting Topics

Questions

- Question & Answer (Q&A) session after each section
- Send additional questions to RDRS@calrecycle.ca.gov

Updates to the RDRS Regulations



Updates to the RDRS Regulations – Outline

- Background
- Purpose of Webinar
- Overview of Regulatory Changes
- Updates by Activity Type
- Omitted Topics
- Q&A Session

Background

- RDRS: CalRecycle's online data system in which businesses, facilities, and operations with a reporting obligation submit required information
- CalRecycle implemented a rulemaking in 2023 to update the RDRS regulations: Title 14, California Code of Regulations (CCR), Sections 18815.1 – 18815.13
- Updates were approved January 23, 2024
- Effective April 1, 2024
 - But note: Not all changes start 2024 Q2

Purpose

- Overview larger changes to the RDRS regulations and potential updates to the RDRS user interface (UI)
- This section will not explain how to report in RDRS
 - Please visit the following website for trainings and recordings of previous workshops:
 - https://calrecycle.ca.gov/SWFacilities/RDReporting/training/

Overview of Regulatory Changes

- Status Changes
- Solid Waste Information System (SWIS) Information
- Collection Method
- Mixed Plastic Waste Export
- Material Type
- Broker/Transporter Outflow Received Out of State

Status Changes & SWIS Information

Status Changes

- Entities may become inactive or exempt from RDRS reporting
- 18815.3(g) and (h) explain process to request inactivity or exemption
- Updates to regulations (effective 2024 Q2) explain that (for all entities):
 - Requests cannot be backdated before the date of the request
 Submit requests when an entity's status changes!
 - Requests will not be approved if any required quarterly reports are missing

SWIS Information

- SWIS Number and SWIS Activity Type required as of the end of 2025 Q1
- If your reporting entity does not have a SWIS number, then no action required
- If your reporting entity does have a SWIS number, then you must enter your SWIS Number and Activity Type by March 31, 2025 (end of 2025 Q1)

Collection Method

- √ Status Changes
- √Solid Waste Information System (SWIS) Information
- Collection Method
- Mixed Plastic Waste Export
- Material Type
- Broker/Transporter Outflow Received Out of State

Collection Method – What?

- Refers to source of material in terms of source sector, segregation extent, and stream
 - Ex: contract-hauled commercial mixed solid waste
- Components of collection method defined in Title 14, CCR, 18815.2(a)(10.5)
- Definition does not list all possible options, but instead the constituent components of collection method

Collection Method Options

- CalRecycle still developing potential collection method options
- Examples
 - Contract-Hauled Commercial Single-Bin (Commingled) Recycling
 - Contract-Hauled Residential Mixed Inorganic Solid Waste
 - Self-Hauled Mixed CDI
- Will provide additional information on specific collection method options at later date

Gather Collection Method – Why?

- Senate Bill (SB) 343 (Allen, Chapter 507, Statutes of 2021)
- Public Resources Code (PRC) 42355.51(d)(1)(A)(i)(I)
 - "in order to provide information ... for evaluating whether a product or packaging is recyclable ... and are of material types and forms that routinely become feedstock ..."
 - Department shall gather in RDRS: "How the material collected or processed by the operations and facilities was collected"

Collection Method - In RDRS

- Starting 2025 Q1, report collection method for material not destined for disposal or landfill beneficial reuse
- Will select one or more methods

 Will enter tons for relevant collection methods Methods used to determine collection method:

- ☐ Billing records for customers
- ☐ Contract Agreements
- ☐ Further options delineated in 18815.9(I)

Collection Method	Tons
Option 1	1,000.05
Option 2	50.67
Etc.	##.##

Mixed Plastic Waste Export

- √Status Changes
- ✓ Solid Waste Information System (SWIS) Information
- ✓ Collection Method
- Mixed Plastic Waste Export
- Material Type
- Broker/Transporter Outflow Received Out of State

Mixed Plastic Waste - What?

- Mixed plastic waste (MPW) is a mixture of plastic
- Mixtures that are not MPW (CCR 18815.2(a)(38.5) and PRC 41821.5):
 - Mixture of solid waste
 - Mixture of green material sent to landfill beneficial reuse
 - Plastic #1, #2, or #5, or a mixture of those three resin types
 - Ex: #1, #2, #5, #1/#2, #1/#5, #2/#5, #1/#2/#5 mixtures are all **not** MPW, but only if each material destined for separate recycling and export follows laws of destination country
 - Ex: #1/#3, #2/#4, #3/#5, #4, #7, #1/#7 mixtures ARE MPW

Mixed Plastic Waste *Export* – What?

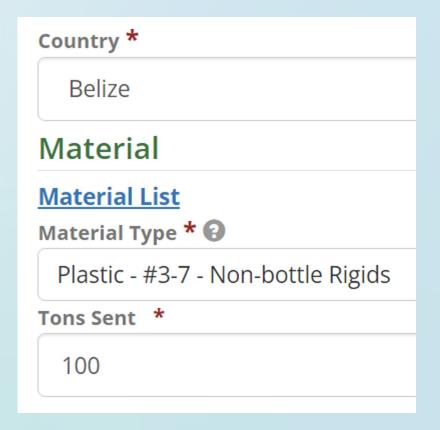
- Export means sent out of the country (PRC 41781.4)
- Except, export excludes
 - Canada and Mexico until relevant trade agreement (<u>USMCA</u>) expires, currently July 2026 (PRC 41781.4)
 - Tribal lands in the USA (CCR 18815.2(a)(25.5))

Mixed Plastic Waste Export – Why?

- Assembly Bill (AB) 881 (Gonzalez, Chapter 501, Statutes of 2021)
 - Classifies mixed plastic waste export as disposal (PRC 41781.4)
 - Requires RDRS reports to include jurisdiction of origin for such materials (41821.5(b)(4))

Mixed Plastic Waste Export – Outflows in RDRS

- Starting 2025 Q1, outflows of mixed plastic waste export will be reported similarly to end use
- Select a destination country
- Select a material type
- Enter tons



Mixed Plastic Waste Export – Origins in RDRS

- For total mixed plastic waste export, enter jurisdictions of origin
- Origins will not be entered separately for each material type or destination country



Material Type

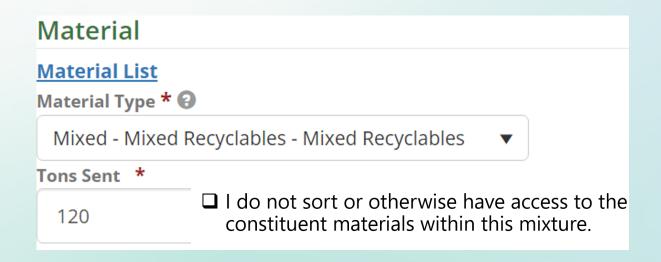
- √Status Changes
- √Solid Waste Information System (SWIS) Information
- ✓ Collection Method
- ✓ Mixed Plastic Waste Export
- Material Type
- Broker/Transporter Outflow Received Out of State

Material Type - Heterogeneous Mixtures

- Certain material flows in RDRS (e.g., recycling/composing outflows) require material type information
- For such streams, starting **2025 Q1**, "if a reporting entity reports material that is not homogenous or not an individual grade of material type, then the reporting entity shall identify the specific materials within that mixture" 18815.9(a)(2)(D)
 - Identification will not require tons
 - Entities can certify that they do not have information on specific materials

Material Types – Selecting Specific Materials

- If user chooses a heterogeneous material, then user must provide the constituent materials or certify that such materials are unknown
- This applies to all activity types



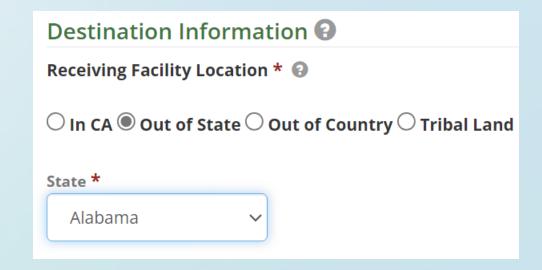


Broker/Transporter Outflow

- √ Status Changes
- ✓ Solid Waste Information System (SWIS) Information
- ✓ Collection Method
- ✓ Mixed Plastic Waste Export
- ✓ Material Type
- Broker/Transporter Outflow Received Out of State

Broker/Transporter Outflow – Region

- Starting 2024 Q2, material sent to a broker/transporter (B/T) who received the material out of CA will be reported by region (state, country, tribal land)
- Receiving location is not the physical address of B/T, but where B/T takes control or acquires authority over material – 18815.2(a)(7) and (62)



Updates by Activity Type

- Self Hauler
- Contract Hauler
- Transfer/Processor (T/P)
- Disposal (Landfill, Transformation, Engineered Municipal Solid Waste [EMSW] Conversion)
- Recycler/Composter (R/C)
- Broker/Transporter (B/T)

Data Requirement Types & Timeline

- Types
 - Provide to destination reporting entities
 - Report within RDRS
- Timeline
 - New obligations start either 2024 Q2 or 2025 Q1
 - Remember that RDRS reports are due in 1 to 3 months after end of quarter, depending on activity type
 - But required data collection needs to begin in relevant quarter

Section – Self Hauler

Self Hauler Requirements – 2024 Q2

- Provide to destination reporting entities:
 - Jurisdictions of origin and collection method all material sent, not just solid waste
- Report in RDRS:
 - No change to reporting within RDRS (only food waste self haulers report)

Contract Hauler Requirements – 2024 Q2

- Provide to destination reporting entities:
 - Jurisdictions of origin and collection method for all material sent, not just solid waste
- Report in RDRS:
 - Broker/Transporter outflows received out of CA, by region

Contract Hauler Requirements – 2025 Q1

- Report in RDRS:
 - Collection method for material sent out of state for purposes other than disposal or landfill beneficial reuse
 - Mixed plastic waste export
 - Material types in heterogenous mixtures, if stream requires material

Section – Transfer/Processor

- ✓ Self Hauler
- √ Contract Hauler
- Transfer/Processor (T/P)
- Disposal (Landfill, Transformation, Engineered Municipal Solid Waste [EMSW] Conversion)
- Recycler/Composter (R/C)
- Broker/Transporter (B/T)

Transfer/Processor Requirements – 2024 Q2

- Provide to destination reporting entities:
 - Jurisdiction of origin for recycling/composting and certain other material streams (see 18815.5(h)(1) and (2)), if requested by the recipient
- Report in RDRS:
 - Broker/Transporter outflows by region if received out of CA

Transfer/Processor Requirements – 2024 Q2 (2)

- Report in RDRS
 - Jurisdictions of origin for residuals
 - Regulations previously required "host assignment" of residuals to location of facility, but this no longer required
 - If T/P tracks the jurisdictions of origin specifically for residuals, then report those origins
 - If T/P tracks jurisdictions for overall inflows, then assign residuals origins based on overall inflow origins

Transfer/Processor Requirements – 2025 Q1

- Provide to destination reporting entities:
 - Jurisdictions of origin for mixed plastic waste sent
- Report in RDRS:
 - Collection method for material accepted for processing for purposes other than disposal or landfill beneficial reuse
 - Mixed plastic waste export
 - Material types in heterogenous mixtures, if stream requires material

Section - Disposal

- ✓ Self Hauler
- √ Contract Hauler
- ✓Transfer/Processor (T/P)
- Disposal (Landfill, Transformation, Engineered Municipal Solid Waste [EMSW] Conversion)
- Recycler/Composter (R/C)
- Broker/Transporter (B/T)

Disposal Requirements - 2024 Q2

- Provide to destination reporting entities:
 - Jurisdictions of origin for recycling/composting and certain other material streams (see 18815.6(g)(1) and (2)), if requested by the recipient
- Report in RDRS:
 - Broker/Transporter outflows by region if received out of CA

Disposal Requirements – 2024 Q2 (2)

- Report in RDRS
 - Jurisdiction of origin for residuals
 - Regulations previously required "host assignment" of residuals to location of facility, but this no longer required
 - If disposal facility tracks the jurisdictions of origin specifically for residuals, then report those origins
 - If disposal facility tracks jurisdictions for overall inflows, then assign residuals origins based on overall inflow origins

Disposal Requirements - 2025 Q1

- Provide to destination reporting entities:
 - Jurisdictions of origin for mixed plastic waste sent
- Report in RDRS:
 - Collection method for material accepted for purposes other than disposal or landfill beneficial reuse
 - Mixed plastic waste export
 - Material types in heterogenous mixtures, if stream requires material

Section – Recycler/Composter

- ✓ Self Hauler
- √ Contract Hauler
- ✓Transfer/Processor (T/P)
- ✓ Disposal (Landfill, Transformation, Engineered Municipal Solid Waste [EMSW] Conversion)
- Recycler/Composter (R/C)
- Broker/Transporter (B/T)

Recycler/Composter Requirements – 2024 Q2

- Provide to destination reporting entities:
 - Jurisdictions of origin for recycling/composting and certain other material streams (see 18815.7(g)(1)), if the sending recycler/composter elects to do so
- Report in RDRS:
 - Broker/Transporter outflows by region if received out of CA

Recycler/Composter Requirements – 2025 Q1

- Provide to destination reporting entities:
 - Jurisdictions of origin for mixed plastic waste sent
- Report in RDRS:
 - Collection method for material accepted for recycling or composting
 - Mixed plastic waste export
 - Material types in heterogenous mixtures, if stream requires material

Section - Broker/Transporter

- ✓ Self Hauler
- √ Contract Hauler
- ✓Transfer/Processor (T/P)
- ✓ Disposal (Landfill, Transformation, Engineered Municipal Solid Waste [EMSW] Conversion)
- ✓ Recycler/Composter (R/C)
- Broker/Transporter (B/T)

Broker/Transporter Requirements – 2024 Q2

- Provide to destination reporting entities:
 - Jurisdictions of origin for recycling/composting and certain other material streams (see 18815.8(d)(1)), if the sending broker/transporter elects to do so
- Report in RDRS:
 - Broker/Transporter outflows by region if received out of CA

Broker/Transporter Requirements – 2025 Q1

- Provide to destination reporting entities:
 - Jurisdictions of origin for mixed plastic waste sent
- Report in RDRS:
 - Collection method for material sent for purposes other than disposal or landfill beneficial reuse
 - Mixed plastic waste export
 - Material types in heterogeneous mixtures, if stream requires material

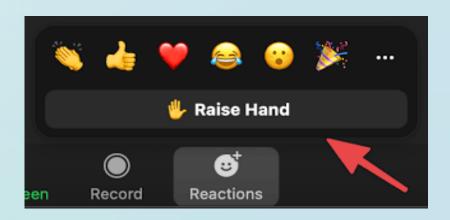
Some Omitted Topics

- Special direct haul reporting scenario for T/Ps - 18815.5(a)(1)(A)
- When disposal facilities report as a transfer/processor – 18815.6(b)(3)
- Some details for determining origins 18815.9(b)
- Quarter that entities must begin reporting when status changes – 18815.3(f)
- Approval of alternative methods 18815.9(m)

- End use includes reuse –
 18815.2(a)(24)
- Reporting error resolution process –
 18815.3(n), (p), and (q)
- Determining material stream for inflows – 18815.9(k)
- Method Department will use to calculate organics recovery efficiency
 18815.5(e) and (f)
- Recycling can be released publicly if aggregated by jurisdiction – 18815.12(g)

Q&A Session – Part 1

- Questions should focus on the topics discussed during this webinar
- If watching via CalEPA Broadcast, email your questions to <u>RDRS@calrecycle.ca.gov</u> with subject "RDRS Public Meeting 5/23 Question"
- If using Zoom, either type your question into the "Chat" (preferred) or use the "Raise Hand" feature (you will be unmuted)



Existing Reporting Topics



Existing Reporting Topics – Outline

- Reporting recyclables mixed with solid waste
- Landfill beneficial reuse and recyclables
- SB 1383 and gray container reporting

Reporting Materials Mixed with Solid Waste

- Loads that are 10 percent or more "solid waste"* by weight shall be tracked and reported in RDRS as solid waste[†]
- Example scenario with tips to ensure compliance available within RDRS Bulletin 2024-01
 - Can also be found on the <u>Training</u> page (see the item, "How to report materials mixed with solid waste")

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* as defined in 14 CCR § 18815.2(a)(57))

† Title 14 CCR Sections 17402.5(c), 18815.9(a)(0.4), 18815.9(a)(0.5), 18815.9(k)(2), & 18815.9(k)(4)
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Beneficial Reuse & Recyclables

- "Beneficial Reuse" refers to when landfills use material for:
 - Alternative Daily Cover (ADC)
 - Alternative Intermediate Cover (AIC)
 - Construction
 - Landscaping and Erosion Control
- If you send material to a T/P or landfill for beneficial reuse, means that you expect material will be used for one of above four uses
- If material will be recycled or composted, do not use the green or non-green "beneficial reuse" streams

Gray Container

- "Gray container collection stream"
 - Solid waste collected in a gray container, where →
 - The gray container is part of a three-container organic waste collection service, which →
 - prohibits the placement of organic waste in the gray container as specified in Title 14 CCR Section 18984.1(a) and (b)

Gray Container Evaluations – Who and What

- Who: Beginning July 1, 2022, transfer/processors that →
 - Receive a gray container collection stream and
 - More than 500 tons of solid waste from at least one jurisdiction annually
- What: Beginning July 1, 2022 →
 - Measure remnant organic waste in the gray container collection stream by performing the measurement protocol described in Title 14 CCR Section 17409.5.7

Gray Container Evaluations – Importance

- Gray container evaluations will help assess:
 - Extent of contamination in the gray container collection waste stream
 - How effectively organic waste is being recovered
- Gray container evaluations may also help gauge the accuracy of the jurisdiction's waste composition studies and container contamination minimization results under Title 14, CCR, Chapter 12
 - Assess how well jurisdictions and facilities are meeting relevant standards

Gray Container vs Mixed Organic Waste Evaluations

- Gray Container evaluations performed on solid waste container that is not allowed to contain organics
- If "gray container" allowed to contain organics, then that container is a "mixed organic waste collection stream" container
 - Requires different set of evaluations

Gray Container Evaluations – How

- Measure organic waste in the incoming gray container collection stream received prior to processing
- Perform one gray container waste evaluation per quarter, for each of the four quarterly reporting periods per calendar year

Step 1: Collect and Weigh Composite Sample

- Take one sample of at least 200 pounds from the incoming gray container collection stream received by the facility. The sample shall be:
 - Representative of a typical operating day; and
 - A random, composite sample taken from various times during the operating day
- Record the weight of the sample

Step 2: Remove and Weigh Remnant Organic Material

- Remove and weigh remnant organic material from the sample
- Remnant organic material is any organic waste that is collected in a gray container
- Record the weight of remnant organic material

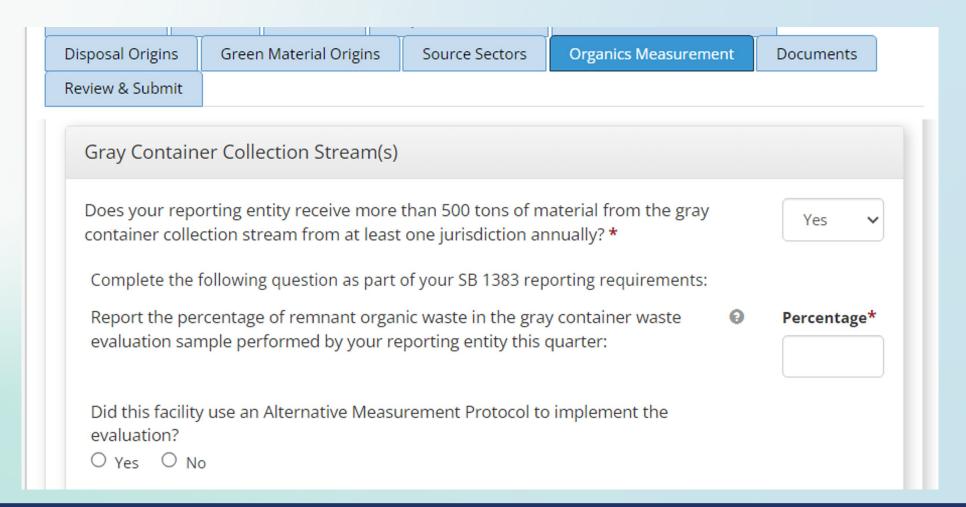
Step 3: Calculate Percent of Remnant Organic Material in Sample

 Use the weights recorded in steps 1 and 2 to calculate the percentage of remnant organic material in the gray container sample:

Organic Material in Sample (Step 2)

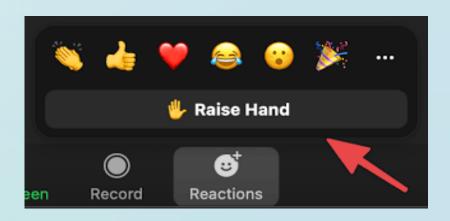
Weight of Remnant ÷ Full Weight of * 100 = Percent Remnant Sample (Step 1) Organic Material

Step 4: Record the calculated percentage in RDRS



Q&A Session – Part 2

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