



City of San Dimas
Compliance Evaluation Findings Report
#24-1419

July 29, 2025

Report Summary

California Code of Regulations, Title 14, Division 7, Chapter 12 - Short-Lived Climate Pollutants

Article 3: Organic Waste Collection Services

Compliant

Section 18984.4. Recordkeeping Requirements for Compliance with Organic Waste Collection Services

Section 18984.6. Recordkeeping Requirements for Container Contamination Minimization

Section 18984.7. Container Color Requirements

Section 18984.8. Container Label Requirements

Section 18984.11. Waivers Granted by a Jurisdiction

Section 18984.14. Recordkeeping Requirements for Waivers and Exemptions

Noncompliant

Section 18984.1. Three-Container Organic Waste Collection Services

Section 18984.5. Container Contamination Minimization

Article 4: Education and Outreach

Compliant**Noncompliant**

Section 18985.1. Organic Waste
Recovery Education and Outreach

None

Section 18985.2. Edible Food Recovery
Education and Outreach

Section 18985.3. Recordkeeping
Requirements for a Jurisdiction's
Compliance with Education and Outreach
Requirements

Article 7: Regulation of Haulers**Compliant****Noncompliant**

Section 18988.1. Jurisdiction Approval of
Haulers and Self-Haulers

None

Section 18988.4. Recordkeeping
Requirements for Compliance with
Jurisdiction Hauler Program

Article 8: CALGreen Building Standards and Model Water Efficient Landscape Ordinance**Compliant****Noncompliant**

Section 18989.1. CALGreen Building
Codes

None

Section 18989.2. Model Water Efficient
Landscape Ordinance

Article 9: Locally Adopted Standards and Policies**Compliant****Noncompliant**

Section 18990.1. Organic Waste
Recovery Standards and Policies

None

Section 18990.2. Edible Food Recovery
Standards and Policies

Article 10: Jurisdiction Edible Food Recovery Programs, Food Generators, and

Food Recovery

Compliant

Noncompliant

Section 18991.1. Jurisdiction Edible Food Recovery Program None

Section 18991.2. Recordkeeping Requirements for Jurisdiction Edible Food Recovery Program

Article 11: Organic Waste Recycling Capacity Planning

Compliant

Noncompliant

Section 18992.1. Organic Waste Recycling Capacity Planning None

Section 18992.2. Edible Food Recovery Capacity

Article 12: Procurement of Recovered Organic Waste Products

Compliant

Noncompliant

Section 18993.3. Recycled Content Paper Procurement Requirements

Section 18993.1. Recovered Organic Waste Product Procurement Target

Section 18993.2. Recordkeeping Requirements for Recovered Organic Waste Procurement Target

Section 18993.4. Recordkeeping Requirements for Recycled Content Paper Procurement

Article 13: Reporting

Compliant

Noncompliant

Section 18994.1. Initial Jurisdiction Compliance Report

None

Section 18994.2. Jurisdiction Annual Reporting

Article 14: Enforcement Requirements

Compliant

Noncompliant

Section 18995.1. Jurisdiction Inspection Requirements

None

Section 18995.2. Implementation Record and Recordkeeping Requirements

Section 18995.3. Jurisdiction Investigation of Complaints of Alleged Violations

Article 16: Administrative Civil Penalties

Compliant

Noncompliant

Section 18997.1. Scope

None

Public Resources Code, Division 30, Part 3, Chapters 12.8 and 12.9

Mandatory Commercial Organics Recycling

The City of San Dimas is implementing a Mandatory Commercial Organics Recycling program.

Mandatory Commercial Recycling

The City of San Dimas is implementing a Mandatory Commercial Recycling program.

Public Resources Code, Division 30, Part 2

Source Reduction and Recycling Element

The City of San Dimas is fully implementing a Residential Diversion Program, Commercial Diversion Program, Construction and Demolition Debris, Recycled Content Procurement, and Education and Outreach Program.

Household Hazardous Waste Element

The City of San Dimas is fully implementing a Household Hazardous Waste Element program.

Overview

Review Process

The Department of Resources Recycling and Recovery's (CalRecycle) Jurisdiction and Agency Compliance and Enforcement Branch (JACE) is required to conduct a compliance evaluation [California Public Resources Code (PRC) Section 41821(h) and Title 14 of the California Code of Regulations (14 CCR) Section 18996.1] of the City of San Dimas's (Jurisdiction) implementation of and compliance with the following:

- Short-Lived Climate Pollutants (SLCP) (14 CCR sections 18981.1 through 18998.4).
- Mandatory Commercial Organics Recycling (MORe) (PRC sections 42649.8 through 42649.87).
- Mandatory Commercial Recycling (MCR) (PRC sections 42649 through 42649.7 and 14 CCR sections 18835 through 18839).
- Source Reduction and Recycling Element (SRRE) (PRC sections 41000 through 41460).
- Household Hazardous Waste Element (HHWE) (PRC sections 41500 through 41516).

JACE's compliance evaluation reviewed the Jurisdiction's waste diversion program implementation, using available information from the Jurisdiction's Implementation Record, Electronic Annual Report (EAR), CalRecycle databases, and communications between CalRecycle and the Jurisdiction. The compliance evaluation included, but was not limited to:

- Communications with the Jurisdiction (phone calls, emails, and letters) to learn about the community and program implementation efforts.
- Field evaluations of the Jurisdiction's residential, commercial, edible food, and procurement programs.
- Observing and evaluating the Jurisdiction's waste, recycling, and organics loads at respective facilities.

JACE did not evaluate SLCP requirements that became effective on January 1, 2024, as the compliance evaluation commenced prior to the date that the requirements became effective. These requirements include inspections of Tier Two commercial edible food generators [14 CCR Section 18995.1(a)(2)] and enforcement actions [14 CCR sections 18995.1(a)(5) and 18995.4].

Communication and Compliance Evaluation Timeline

The Jurisdiction was notified on April 3, 2023, by letter (Attachment 1) that a compliance evaluation would be conducted by JACE to determine the status of the Jurisdiction's implementation of programs designed to divert organics and edible food from landfills.

- April 17, 2023, JACE sent a letter (Attachment 2) to request access to the Jurisdiction's Implementation Record by May 1, 2023.
- April 20, 2023, JACE staff accessed the Implementation Record via SharePoint.

- November 27 - November 30, 2023, JACE staff conducted a field visit.
- January 7, 2025, JACE staff sent the Jurisdiction a draft findings report with the opportunity to provide feedback.
- January 15, 2025, the Jurisdiction requested an extension to provide feedback to draft findings report.
- January 16, 2025, JACE approved the request for an extension to provide feedback to the draft findings report.
- January 30, 2025, the Jurisdiction provided additional information about programs that were found noncompliant in the draft findings report.
- February 12, 2025, JACE staff responded to the additional information with follow-up questions.
- February 27, 2025, the Jurisdiction provided answers to JACE's follow-up questions.
- Additional communications and other interactions that took place with the Jurisdiction throughout the compliance evaluation, which included phone calls, email messages, and meetings.

Existing Jurisdiction Conditions

The City of San Dimas is in Los Angeles County. According to the 2021 U.S. Census, the Jurisdiction encompasses 15.03 square miles. The Jurisdiction has a population of 34,407 (Department of Finance, 2021). According to the Jurisdiction's base year history (1998), 20 percent of the Jurisdiction's total waste generation is from the residential waste stream and 80 percent from the non-residential waste stream.

Summary of Jurisdiction's Solid Waste Infrastructure and Materials Flow

Through Jurisdiction interviews, it was determined that the Jurisdiction has one approved hauler, WM, with an exclusive franchise agreement to collect waste, dry recyclables, and organic materials for all residents and commercial businesses. Residents and commercial businesses are allowed to self-haul their materials for recycling and disposal.

Materials collected in the Jurisdiction are taken to the following transfer station:

1. Azusa Material Recovery Facility (MRF) located in Azusa.

Gray container material is mixed with other jurisdictions' material, loaded in transfer trailers, and disposed of at WM – El Sobrante Landfill.

Blue container material is mixed with other jurisdictions' recyclables and processed at WM – Transfer Station and Recycling Center in Azusa.

Green container material is mixed with other jurisdictions' organic material, loaded in transfer trailers, and taken to Valley Vista Services Transfer Station in Pomona Valley for processing.

Self-hauling is allowed by the Jurisdiction. Self-haulers are required to haul source

separated organics to a facility that recovers those materials.

The Jurisdiction does not provide mixed waste organic collection and reported that it does not use a High Diversion Organic Waste Processing Facility (HDOWPF).

Short-Lived Climate Pollutants (SLCP) Regulation Evaluation

General Provisions

14 CCR Section 18981.2. Implementation Requirement on Jurisdictions

See Table 1 below for specific information on ordinances, enforceable mechanisms, and other requirements.

Table 1

Program Requirements	Findings
Adopted enforceable ordinance(s) or mechanism(s) to mandate compliance with SLCP requirements. [18981.2(a)]	See details in the Articles below regarding enforceable ordinances or mechanisms to mandate compliance with SLCP requirements.
Designations of responsibilities made through contracts or agreements. [18981.2(b)]	The Jurisdiction provided evidence demonstrating that responsibilities are designated through contracts and agreements.
Civil penalties not designated to a private entity. [18981.2(d)]	The Jurisdiction provided evidence demonstrating that civil penalties are not designated to a private entity.
Copies of designee agreements and contracts included in the Implementation Record. [18981.2(e)]	The Jurisdiction provided evidence of designee agreements and contracts.

Article 3: Organic Waste Collection Services

14 CCR Section 18984.1. Three-Container Organic Waste Collection Services

Finding: Noncompliant

The Jurisdiction has not fully implemented a three-container collection system for all commercial organic waste generators. Based on the 2022 EAR, the Jurisdiction reported that 437 commercial generators have not been provided a three-container collection system. The Jurisdiction's Implementation Record contains records of 101 commercial businesses with de minimis waivers.

During JACE staff's field investigation, it was confirmed not all commercial generators had a three-container collection system. The Jurisdiction stated it is taking enforcement actions on noncompliant generators.

14 CCR Section 18984.4. Recordkeeping Requirements for Compliance with Organic Waste Collection Services

Finding: Compliant

The Jurisdiction's Implementation Record contains all of the records required by Section 18984.4.

14 CCR Section 18984.5. Container Contamination Minimization

Finding: Noncompliant

The Jurisdiction's Implementation Record indicates that route reviews are conducted for container contamination. However, the Jurisdiction did not provide any documentation to show that route reviews have been conducted.

JACE staff's field visit photo report (Attachment 3) and field visit map (Attachment 4) show examples and locations of JACE staff's observations. JACE staff's field visit map shows:

- Residential sector:
 - 32 green containers evaluated
 - One (1) of 32 containers had contaminants
 - 41 blue containers evaluated
 - Four (4) of 41 containers had contaminants
 - 48 gray containers evaluated
 - 10 of 48 containers had contaminants
- Commercial sector:
 - Five (5) green containers evaluated
 - Zero (0) of five (5) containers had contaminants
 - 13 blue containers evaluated
 - Three (3) of 13 containers had contaminants

- 17 gray containers evaluated
 - Six (6) of 17 containers had contaminants

See Table 2 below for specific details about the Jurisdiction's container contamination minimization program.

Table 2

Program Requirements	Compliance	Findings
Conduct annual route reviews for prohibited container contaminants on containers for all hauler routes annually. [18984.5(b)]	No	The Jurisdiction did not provide evidence that route reviews have been conducted.
Notify the generator if prohibited container contaminants are in a container. [18984.5(b)(1)] • The notice shall include information regarding the generator's requirements to properly separate materials and may include photographic evidence of the violation. [18984.5(b)(1)(A)]	Yes	The Jurisdiction provided evidence (a sample cart tag and the education about properly separating materials) that generators are notified if prohibited container contaminants are found.
Conduct waste evaluations for prohibited container contaminants [18984.5(c)]	N/A	
If the sampled weight of prohibited container contaminants exceeds 25 percent of the measured sample for any container type, the jurisdiction shall perform one of the following: [18984.5(c)(2)] • Notify all generators on the sampled hauler route of their requirement to properly separate materials. [18984.5(c)(2)(A)] • Perform a targeted route review of containers on the routes sampled and notify those generators of their obligation to properly separate materials. [18984.5(c)(2)(B)]	N/A	

14 CCR Section 18984.6. Recordkeeping Requirements for Container Contamination

Minimization

Finding: Compliant

The Jurisdiction provided documentation on January 30, 2025, supporting that the Jurisdiction's Implementation Record contains all of the records required by Section 18984.6.

See Table 3 below for specific documentation required in the Implementation Record.

Table 3

Implementation Record Requirements	Received	Notes (as needed)
A description of the jurisdiction's process for determining the level of container contamination. [18984.6(a)(1)]	Yes	
Documentation of route reviews conducted, including identifying information for the subject or subjects of the route review. [18984.6(a)(2)]	Yes	
Documentation of waste evaluations performed, including: [18984.6(a)(3)] • Information on targeted route reviews conducted as a result of the studies. [18984.6(a)(3)] • Dates of the studies [18984.6(a)(3)] • Location of the solid waste facility where the study was performed. [18984.6(a)(3)] • Routes [18984.6(a)(3)] • Source sector (commercial or residential) [18984.6(a)(3)] • Number of samples [18984.6(a)(3)] • Weights and ratio of prohibited container contaminants [18984.6(a)(3)] • Total sample size [18984.6(a)(3)]	N/A	

Implementation Record Requirements	Received	Notes (as needed)
Copies of notices issued to generators with prohibited container contaminants. [18984.6(a)(4)]	Yes	
Documentation of the number of containers where the contents were disposed. [18984.6(a)(5)]	Yes	

14 CCR Section 18984.7. Container Color Requirements

Finding: Compliant

The Jurisdiction has containers that meet the container color requirements. JACE staff observed new containers distributed to generators that meet the color container requirements.

14 CCR Section 18984.8. Container Labeling Requirements

Finding: Compliant

The Jurisdiction has containers that meet the container labeling requirements. JACE staff observed new containers distributed to generators that meet the container labeling requirements.

14 CCR Section 18984.11. Waivers Granted by a Jurisdiction

Finding: Compliant

The Jurisdiction's Implementation Record contains a written description of how waivers will be issued and validated. The Jurisdiction reported issuing 101 de minimis waivers and the Implementation Record contains these records. The Jurisdiction allows for physical space waivers to be issued, but no physical space waivers have been issued. The Jurisdiction has not reported sediment debris disposal, homeless encampment or illegal disposal cleanup, or quarantined organic waste that was disposed which would require documentation.

14 CCR Section 18984.14. Recordkeeping Requirements for Waivers and Exemptions

Finding: Compliant

The Jurisdiction's Implementation Record contains all of the records required by Section 18984.14.

Article 3 Electronic Annual Report Findings

Based on the 2022 EAR, the Jurisdiction reported providing a 3-, 2-, and 1-container collection system to commercial generators. A three-container collection system should be the only selection for commercial generators in the EAR consistent with the Jurisdiction's adopted ordinance. Nine (9) route reviews were reported as being conducted. Additionally, the Jurisdiction has reported 95 de minimis waivers being issued.

Article 4: Education and Outreach

14 CCR Section 18985.1. Organic Waste Recovery Education and Outreach

Finding: Compliant

The Jurisdiction provided documentation that shows information is annually distributed related to a three-container collection system. This documentation contains information on the organic waste generator's requirement to properly separate materials into appropriate containers, methods for prevention of organic waste generation, the public health and safety and environmental impacts associated with the reduction of landfilling organic waste, approved hauler of organic waste, self-hauling requirements, and information regarding programs for the donation of edible food.

14 CCR Section 18985.2. Edible Food Recovery Education and Outreach

Finding: Compliant

The Jurisdiction provided evidence that information related to edible food recovery is distributed annually.

14 CCR Section 18985.3. Recordkeeping Requirements for a Jurisdiction's Compliance with Education and Outreach Requirements

Finding: Compliant

The Jurisdiction's Implementation Record contains all of the records required by Section 18985.3.

Article 4: Electronic Annual Report Findings

Based on the 2022 EAR, the Jurisdiction reported that a total of 2,000 generators receive informational materials related to SLCP, which accounts for 21 percent of reported generators. The Jurisdiction reports that all 10 commercial edible food generators have been provided information regarding the Jurisdiction's edible food recovery program.

Article 7: Regulation of Haulers

14 CCR Section 18988.1. Jurisdiction Approval of Haulers and Self-Haulers

Finding: Compliant

The Jurisdiction has adopted an ordinance that requires hauler compliance with the SLCP regulations. The Jurisdiction requires haulers to identify the facilities to which organic waste is transported and requires the haulers to comply with Article 3. The Jurisdiction allows for self-hauling. Section 8.12.090 of the Jurisdiction's ordinance contains the hauler requirements and Section 8.12.100 contains the self-hauling requirements.

14 CCR Section 18988.4. Recordkeeping Requirements for Compliance with Jurisdiction Hauler Program

Finding: Compliant

The Jurisdiction provided documentation on January 30, 2025, supporting that the Jurisdiction's Implementation Record contains all of the records required by Section 18988.4.

See Table 4 below for specific documentation required in the Implementation Record.

Table 4

Implementation Record Requirements	Received	Notes as needed
Ordinances, contracts, franchise agreements, policies, procedures, or programs relevant to regulation of haulers. [18988.4(a)(1)]	Yes	

Implementation Record Requirements	Received	Notes as needed
A description of the jurisdiction's hauler program including: [18988.4(a)(1)] • Type(s) of hauler system(s) the jurisdiction uses. [18988.4(a)(2)(A)] • Type(s) and conditions(s) of approvals per type of hauler, and criteria for approvals, denials and revocations. [18988.4(a)(2)(B)] • The process for issuing, revoking, and denying written approvals. [18988.4(a)(2)(C)] • Any requirements associated with self-hauling and back-hauling. [18988.4(a)(2)(D)]	Yes	
Record of hauler compliance with local ordinance(s) and requirements including: [18988.4(a)(3)] • Copies of all reports required from haulers. [18988.4(a)(3)(A)] • Copies of all written approvals, denials, and revocations. [18988.4(a)(3)(B)]	Yes	
All records include the date of action, name of hauler, and the type of action taken by the jurisdiction. [18988.4(b)]	Yes	

Article 7: Electronic Annual Report Findings

Based on the 2022 EAR, the Jurisdiction reported one (1) hauler approved to collect organic waste.

Article 8: CALGreen Building Standards and Model Water Efficient Landscape Ordinance

14 CCR Section 18989.1. CALGreen Building Codes

Finding: Compliant

A CALGreen ordinance was adopted and provided by the Jurisdiction.

14 CCR Section 18989.2. Model Water Efficient Landscape Ordinance

Finding: Compliant

A Model Water Efficient Landscape Ordinance (MWELO) was adopted and provided by the Jurisdiction.

Article 8 Electronic Annual Report Findings

Based on the 2022 EAR, the Jurisdiction reported 164 CALGreen projects and 11 projects subject to MWELO.

Article 9: Locally Adopted Standards and Policies

14 CCR Section 18990.1. Organic Waste Recovery Standards and Policies

Finding: Compliant

There was no evidence that the Jurisdiction had an ordinance, policy, procedure, permit condition, or initiative listed in 14 CCR Section 18990.1(b)(1-5).

14 CCR Section 18990.2. Edible Food Recovery Standards and Policies

Finding: Compliant

There was no evidence of an ordinance, policy, procedure that prohibits the ability of a generator, food recovery organization, or food recovery service to recover edible food that could be recovered for human consumption.

Article 10: Jurisdiction Edible Food Recovery Programs, Food Generators, and Food Recovery

14 CCR Section 18991.1. Jurisdiction Edible Food Recovery Program

Finding: Compliant

The Jurisdiction has implemented an edible food recovery program. The Jurisdiction provided evidence that commercial edible food generators are educated on the requirements to donate edible food, how edible food can be donated, and where to donate the edible food. The Jurisdiction conducted inspections and monitors commercial edible food generators to ensure compliance with the requirements. The Jurisdiction was not identified as needing to increase edible food recovery capacity.

14 CCR Section 18991.2. Recordkeeping Requirements for Jurisdiction Edible Food Recovery Program

Finding: Compliant

The Jurisdiction's Implementation Record contains all of the records required by Section 18991.2.

Article 10 Electronic Annual Report Findings

Based on the 2022 EAR, the Jurisdiction reported 10 commercial edible food generators. The Jurisdiction reported having three (3) food recovery organization and services located within the Jurisdiction.

Article 11: Organic Waste Recycling Capacity Planning

14 CCR Section 18992.1. Organic Waste Recycling Capacity Planning

Finding: Compliant

The Jurisdiction is part of Los Angeles County organic waste recycling capacity and was not identified by Los Angeles County as needing to submit an implementation schedule.

14 CCR Section 18992.2. Edible Food Recovery Capacity

Finding: Compliant

The Jurisdiction is part of Los Angeles County's edible food recovery capacity planning and was not identified by Los Angeles County as needing to submit an implementation schedule.

Article 11 County Capacity Planning Report

The Jurisdiction was not identified in Los Angeles County's 2022 - 2024 Capacity Planning report as needing to submit an implementation schedule to CalRecycle.

Article 12: Procurement of Recovered Organic Waste Products

14 CCR Section 18993.1. Recovered Organic Waste Product Procurement Target

Finding: Noncompliant

The Jurisdiction did not meet its Recovered Organic Waste Product Procurement (ROWP) target for 2022. The Jurisdiction has a procurement target of 2,720 ROWP units. Based on the 2022 EAR, the Jurisdiction reported procuring zero (0) ROWPs. Based on the 2023 EAR, the Jurisdiction reported procuring 1,406.90 ROWPs (30% of their target). However, the Jurisdiction stated that this procurement is through the sale of compost and not through a direct service provider procuring the compost on behalf of the jurisdiction, which is not compliant per SLCP.

14 CCR Section 18993.2. Recordkeeping Requirements for Recovered Organic Waste Procurement Target

Finding: Compliant

The Jurisdiction provided documentation on January 30, 2025, supporting that the Jurisdiction's Implementation Record contains all of the records required by Section 18993.2.

See Table 5 below for specific documentation required in the Implementation Record.

Table 5

Implementation Record Requirements	Received	Notes (as needed)
A description of how the jurisdiction complies with requirements of the recovered organic waste procurement target. [18993.2(a)(1)]	Yes	

Implementation Record Requirements	Received	Notes (as needed)
The name, physical location, and contact information of each entity, operation, or facility from whom the recovered organic waste products were procured, and a general description of how the product was used, and if applicable, where the product was applied. [18993.2(a)(2)]	Yes	
All invoices or similar records evidencing all procurement. [18993.2(a)(3)]	Yes	
If applicable, records of procurement of recovered organic waste products made by direct service provider(s) on behalf of the jurisdiction including invoices or similar records evidencing procurement. [18993.2(a)(4)]	Yes	
If applicable, written certification by an authorized representative of the Publicly Owned Treatment Works (POTW), attesting the following: [18993.2(a)(5)] • That the POTW was in compliance with the exclusion in 14 CCR Section 17896.6(a)(1). [18993.2(a)(5)(A)] • The total tons of organic waste received from the types of solid waste facilities listed in 14 CCR Section 18993.1(h)(1). [18993.2(a)(5)(B)] • The percentage of biosolids that the POTW produced and transported to activities that constitute landfill disposal. [18993.2(a)(5)(C)]	N/A	

Implementation Record Requirements	Received	Notes (as needed)
If electricity is procured from a biomass conversion facility, a written certification by an authorized representative of the biomass conversion facility that biomass feedstock was received from a permitted solid waste facility identified in 14 CCR Section 18993.1(i). [18993.2(a)(6)]	N/A	
If the jurisdiction is implementing an adjusted procurement target the records evidencing the total amount of transportation fuel, electricity, and gas for heating applications procured during the calendar year prior to the applicable reporting period. [18993.2(a)(7)]	N/A	
If procuring mulch, a copy of the ordinance or similarly enforceable mechanism the jurisdiction has adopted requiring that mulch procured meets the land application standards specified in 14 CCR Section 18993.1. [18993.2(a)(8)]	Yes	

14 CCR Section 18993.3. Recycled Content Paper Procurement Requirements

Finding: Compliant

The Jurisdiction provided evidence to support that printing and writing and paper products, including, but not limited to, toilet paper, paper towels, facial tissue, and toilet seat covers are procured, pursuant to Public Contract Code 22150 – 22154 when not cost prohibitive and if fitness and quality are equal. The Jurisdiction's paper products and printing and writing paper do not need to be deemed eligible to be labeled with an unqualified recyclable label since post-consumer recycled products were not purchased. The Jurisdiction requires businesses whom it purchases paper products to certify requirements in writing.

14 CCR Section 18993.4. Recordkeeping Requirements for Recycled Content Paper Procurement

Finding: Compliant

The Jurisdiction's Implementation Record contains all of the records required by Section 18993.4.

Article 12 Electronic Annual Report Findings

The Jurisdiction has a procurement target of 2,720 ROWP units. Based on the 2022 EAR, the Jurisdiction reported procuring zero (0) ROWPs. Based on the 2023 EAR, the Jurisdiction reported procuring 1,406.90 ROWPs.

Article 13: Reporting

14 CCR Section 18994.1. Initial Jurisdiction Compliance Report

Finding: Compliant

The Jurisdiction submitted its initial jurisdiction compliance report on time.

14 CCR Section 18994.2. Jurisdiction Annual Reporting

Finding: Compliant

The Jurisdiction submitted its EAR on time for the period reviewed for this compliance evaluation.

Article 13 Electronic Annual Report Findings

The Jurisdiction submitted its completed 2022 EAR on time.

Article 14: Enforcement Requirements

14 CCR Section 18995.1. Jurisdiction Inspection Requirements

Finding: Compliant

On January 30, 2025, the Jurisdiction provided evidence supporting implementation of an inspection program.

See Table 6 below for specific information about the Jurisdiction's inspection program implementation.

Table 6

Program Requirements	Compliance	Findings
At least annually conduct a compliance review of commercial businesses that generate two cubic yards or more per week of solid waste, including organic waste generator subscribing to collection services or self-haul. [18995.1(a)(1)(A)]	Yes	The Jurisdiction provided evidence that compliance reviews are conducted.
At least annually conduct route reviews and/or waste evaluations. [18995.1(a)(1)(A)(2)]	Yes	See details in Article 3 above.
Conduct inspections of Tier One commercial edible food generators. [18995.1(a)(2)]	Yes	The Jurisdiction provided evidence to support inspections of Tier One commercial edible food generators was conducted and they were evaluated for compliance.
Conduct inspections of food recovery organizations and services for compliance. [18995.1(a)(2)]	Yes	The Jurisdiction provided evidence that supports inspections of food recovery organizations and services are in compliance.
Investigate complaints. [18995.1(a)(3)]	Yes	See details in Table 10 below.
Provide educational material describing requirements in response to violations (required in 2022 and 2023 only). [18995.1(a)(4)]	Yes	The Jurisdiction provided evidence that demonstrates educational materials were distributed in response to violations.
Conduct a sufficient number of route reviews and inspections to adequately determine overall compliance. [18995.1(b)]	Yes	See details in Article 3 above.

Program Requirements	Compliance	Findings
Generate a written or electronic record for each inspection, route review, and compliance review conducted. [18995.1(c)]	Yes	The Jurisdiction provided evidence to support inspections of commercial edible food generators occurred, but not for food recovery organizations and services. Records for route reviews are generated by the hauler. No documentation has been provided for route reviews. The Jurisdiction provided evidence that compliance reviews were conducted.

See Table 7 below for specific documentation required in the Implementation Record.

Table 7

Implementation Record Requirements	Received	Notes (as needed)
A written or electronic record for each inspection including: [18995.1(c)] - Identifying information for the subject(s) of inspection, such as name or account name of each person or entity. [18995.1(c)(1)(A)] - The date(s) inspections were conducted. [18995.1(c)(2)] - The person(s) who conducted the inspections. [18995.1(c)(3)] - Findings regarding compliance for inspections, including any Notices of Violation, penalty orders, or education materials issued. [18995.1(c)(4)] - Any relevant evidence supporting the findings above for inspections, such as photographs and account records. [18995.1(c)(5)]	Yes	

Implementation Record Requirements	Received	Notes (as needed)
A written or electronic record for each route review including: [18995.1(c)] - Identifying information for the subject(s) of the route review, such as the name of each person or a description of the hauler route and addresses covered. [18995.1(c)(1)] - The date(s) route review was conducted [18995.1(c)(2)] - The person(s) who conducted the route review [18995.1(c)(3)] - Findings regarding compliance for route reviews, including any Notices of Violation or education materials issued, penalty orders, or education materials issued. [18995.1(c)(4)] - Any relevant evidence supporting the findings above for route reviews, such as photographs and account records. [18995.1(c)(5)] - A description of the locations of the route review(s) and the addresses where prohibited container contaminants were found. [18995.1(c)(6)]	Yes	

Implementation Record Requirements	Received	Notes (as needed)
A written or electronic record for each compliance review including: [18995.1(c)] - Identifying information for the subject(s) of the compliance review, such as a list of accounts reviewed for each compliance review. [18995.1(c)(1)] - The date(s) compliance reviews were conducted [18995.1(c)(2)] - The person(s) who conducted the compliance review [18995.1(c)(3)] - Findings regarding compliance for compliance reviews, including any Notices of Violation, penalty orders, or education materials issued. [18995.1(c)(4)] - Any relevant evidence supporting the findings above for compliance reviews, such as photographs and account records. [18995.1(c)(5)]	Yes	
Documentation of route reviews, compliance reviews, inspections, and all other enforcement records, including: [18995.1(d)] - Copies of all route review, compliance review, and inspection documentation. [18995.1(d)(1)] - Copies of all enforcement actions. [18995.1(d)(2)] - A list of date(s) determined an entity complied with a Notice of Violation and the evidence that supports compliance determination. [18995.1(d)(3)] - Copies of notices and educational material. [18995.1(d)(4)]	Yes	

14 CCR Section 18995.2. Implementation Record and Recordkeeping Requirements

Findings: Compliant

Recordkeeping findings for specific regulations can be found in above sections.

See Table 8 below for Implementation Record program requirements.

Table 8

Program Requirements	Compliance	Findings
All records are maintained in the Implementation Record. [18995.2(a)]	Yes	See details in Table 9 below.
Stored in one central location, physical or electronic. [18995.2(b)]	Yes	The Jurisdiction provided evidence that the Implementation Record is stored in a central location.
Access was provided within ten business days. [18995.2(c)]	Yes	The Jurisdiction provided access to the Implementation Record within 10 business days.
Includes records within 60 days of their creation. [18995.2(d)]	Yes	The Jurisdiction's Implementation Record contained records created within 60 days.
Retains all records for five years. [18995.2(e)]	Yes	The Jurisdiction's Implementation Record contained records since January 1, 2022.

See Table 9 below for specific documentation required in the Implementation Record.

Table 9

Implementation Record Requirements	Received	Notes (as needed)
Copy of all ordinances or enforceable mechanisms, contracts, and agreements. [18995.2(f)(1)]	Yes	
Written description of the jurisdiction's inspection and enforcement program. [18995.2(f)(2)]	Yes	

Implementation Record Requirements	Received	Notes (as needed)
All organic waste collection service records. [18995.2(f)(3)]	Yes	
All contamination minimization records. [18995.2(f)(4)]	Yes	
All waiver and exemption records. [18995.2(f)(5)]	Yes	
All education and outreach records. [18995.2(f)(6)]	Yes	
All hauler program records. [18995.2(f)(7)]	Yes	
All jurisdiction edible food recovery program records. [18995.2(f)(8)]	Yes	
All recovered organic waste procurement target records. [18995.2(f)(9)]	Yes	
All recycled content paper procurement records. [18995.2(f)(10)]	Yes	
All inspection documents. [18995.2(f)(11)]	Yes	
All complaint and investigation records. [18995.2(f)(13)]	Yes	

14 CCR Section 18995.3. Jurisdiction Investigation of Complaints of Alleged Violations

Finding: Compliant

The Jurisdiction provided evidence to support implementation of a program for the investigation of complaints of alleged violations

See Table 10 below for specific information about the Jurisdiction's investigation of complaints program implementation.

Table 10

Program Requirements	Compliance	Findings
Provides a procedure for the receipt and investigation of written complaints of alleged violations. [18995.3(a)]	Yes	The Jurisdiction provided evidence of a procedure for the receipt and investigation of written complaints of alleged violations.
Allows for the submission of anonymous complaints. [18995.3(a)]	Yes	The Jurisdiction's Municipal Code, Section 8.12.140, allows for the submission of anonymous complaints.
The procedure provides complaints be in writing and include the following information: [18995.3(b)] • If the complaint is not anonymous, the name and contact information of the complainant [18995.3(b)(1)] • The identity of the alleged violator, if known. [18995.3(b)(2)] • A description of the alleged violation including location(s) and all other relevant facts known to the complainant. [18995.3(b)(3)] • Any relevant photographic or documentary evidence to support the allegations in the complaint. [18995.3(b)(4)] • The identity of any witnesses, if known. [18995.3(b)(5)]	Yes	The Jurisdiction's complaint process related to SLCP specifies the information to include in the complaint.
Provides a procedure to notify complainants of results. [18995.3(d)]	Yes	The Jurisdiction's complaint process specifies how complainants will be notified of the results of the complaint.
All records are maintained in Implementation Record. The records include the complaint as received and the jurisdiction's determination of compliance or notice of violations issued. [18995.3(e)]	N/A	The Jurisdiction did not report receiving any complaints; therefore, no records were in the Implementation Record.

14 CCR Section 18995.4. Enforcement by a Jurisdiction

The compliance evaluation for the Jurisdiction took place prior to January 1, 2024, when

this requirement became effective.

Article 14 Electronic Annual Report Findings

Based on the 2022 EAR, the Jurisdiction reported that 10 Tier One commercial edible food generator and one (1) food recovery organization or service inspections were conducted. There were zero (0) complaints reported.

Article 16: Administrative Civil Penalties

14 CCR Section 18997.1. Scope

Finding: Compliant

The Jurisdiction has adopted a Mandatory Organic Waste Disposal Reduction Ordinance that includes it will impose penalties in the correct penalty amounts consistent with 14 CCR Section 18997.2.

Mandatory Commercial Organics Recycling (MORe)

PRC Section 42649.82

The Jurisdiction has implemented its Mandatory Commercial Organics Recycling program.

Documentation in the Jurisdiction's Implementation Record stated that 282 commercial businesses are not recycling organics. The Jurisdiction has reported that noncompliant commercial businesses are notified of their noncompliance and fines associated for remaining noncompliant.

See SLCP Article 3 section above for more information.

MORe Electronic Annual Report Findings

Based on the 2022 EAR, the Jurisdiction reported that out of 452 commercial businesses that are required to recycle organics, 279 are not recycling organics. This is a compliance rate of 38 percent. Additionally, the Jurisdiction reported that outreach is conducted on the requirements of the law and offers service levels for compliance. The Jurisdiction has not reported if noncompliant generators are notified of their noncompliance.

Mandatory Commercial Recycling (MCR)

PRC Section 42649.3 and 14 CCR Section 18838

The Jurisdiction has implemented its Mandatory Commercial Recycling program.

The Jurisdiction has reported that noncompliant commercial businesses are notified of their noncompliance and fines associated for remaining noncompliant.

See SLCP Article 3 section above for more information.

MCR Electronic Annual Report Findings

Based on the 2022 EAR, the Jurisdiction reported that out of 262 commercial businesses required to recycle, 31 are not recycling. This is a compliance rate of 88 percent. Additionally, the Jurisdiction reports that noncompliant commercial businesses are notified of their noncompliance and options to subscribe to service to comply.

Source Reduction Recycling Element Program (SRRE)

Residential Diversion Program

The Jurisdiction did report and provide evidence to support implementation of a residential diversion program. In addition to curbside collection programs, the Jurisdiction encourages residents to do backyard composting. There are three (3) thrift shops located in the Jurisdiction where residents can donate unwanted clothing and home goods instead of disposing. There are two (2) buy-back centers located in the Jurisdiction with many more located just outside the Jurisdiction.

On the November 27 – 30, 2023, field visit, JACE staff evaluated 32 green containers and observed an average contamination rate of approximately three (3) percent. Staff observed and evaluated four (4) green container material loads, which contained approximately five (5) percent prohibited container contaminants.

On the November 27 – 30, 2023, field visit, JACE staff evaluated 41 blue containers and observed an average contamination rate of nine (9) percent. Staff observed and evaluated four (4) blue container material loads, which contained approximately 15 percent prohibited container contaminants.

On the November 27 – 30, 2023, field visit, JACE staff evaluated 48 gray containers and observed an average of 14 percent of divertible materials. Staff observed and evaluated six (6) gray container material loads, which contained approximately 17 percent divertible materials.

See SLCP Article 3 section above for more information.

Commercial Diversion Program

The Jurisdiction did report and provide evidence to support implementation of a commercial diversion program.

On the November 27 – 30, 2023, field visit, JACE staff evaluated five (5) green containers and observed an average contamination rate of approximately 24 percent. Staff observed and evaluated one (1) green container material load, which was disposed because of heavy contamination.

On the November 27 – 30, 2023, field visit, JACE staff evaluated 13 blue containers and observed an average contamination rate of six (6) percent. Staff observed and evaluated two (2) blue container material loads which contained approximately 10 percent prohibited container contaminants.

On the November 27 – 30, 2023, field visit, JACE staff evaluated 17 gray containers and observed an average of 16 percent of divertible materials. Staff observed and evaluated two (2) gray container material loads which contained approximately 30 percent divertible materials.

See SLCP Article 3 section above for more information.

Construction and Demolition Debris

The Jurisdiction reported the implementation of a construction and demolition (C&D) debris diversion program. The Jurisdiction's Municipal Code, Section 8.12.110 requires compliance with the CALGreen requirements for residential and commercial construction projects.

See SLCP Article 8 section above for more information.

Recycled Content Procurement

The Jurisdiction provided evidence to support implementation of a recycled content procurement program. The Jurisdiction's documentation demonstrated that recycled content paper products are procured when the cost of those products are at a lower cost than non-recycled content products.

See SLCP Article 12 section above for more information.

Education and Outreach

The Jurisdiction did report and provide evidence to support implementation of an education and outreach program.

See SLCP Article 4 section above for more information.

Household Hazardous Waste Element Program (HHWE)

The Jurisdiction provided evidence to support implementation of HHWE program. The Jurisdiction offers battery drop off at City Hall. Los Angeles County has facilities where Jurisdiction residents can drop off electronic waste, paint, batteries, used motor oil, and other chemicals. Additionally, the Jurisdiction offers curbside collection of household hazardous waste. Information on the Jurisdiction's HHWE program is located on its website.

Additional Information

Attachments

1. April 3, 2023, Notification of Compliance Evaluation for the City of San Dimas
2. April 17, 2023, Request for SB 1383 Implementation Record for the City of San Dimas
3. Photo Report for the City of San Dimas
4. Field Visit Map for the City of San Dimas

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