



City of Cudahy
Compliance Evaluation Findings
Report #23-1158

September 4, 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 18984.11. 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 18984.4. Recordkeeping Requirements for Compliance with Organic Waste Collection Services
- Section 18984.5. Container Contamination Minimization
- Section 18984.6. Recordkeeping Requirements for Container Contamination Minimization

Article 4: Education and Outreach

Compliant

- None

Noncompliant

- Section 18985.1. Organic Waste Recovery Education and Outreach
- 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

None

Noncompliant

Section 18988.1. Jurisdiction Approval of Haulers and Self-Haulers

Section 18988.4. Recordkeeping Requirements for Compliance with Jurisdiction Hauler Program

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

Compliant

Section 18989.2. Model Water Efficient Landscape Ordinance

Noncompliant

Section 18989.1. CALGreen Building Codes

Article 9: Locally Adopted Standards and Policies

Compliant

Section 18990.1. Organic Waste Recovery Standards and Policies

Section 18990.2. Edible Food Recovery Standards and Policies

Noncompliant

None

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

Compliant

None

Noncompliant

Section 18991.1. Jurisdiction Edible Food Recovery Program

Section 18991.2. Recordkeeping Requirements for Jurisdiction Edible Food Recovery Program

Article 11: Organic Waste Recycling Capacity Planning

Compliant

Section 18992.1. Organic Waste Recycling Capacity Planning

Section 18992.2. Edible Food Recovery Capacity

Noncompliant

None

Article 12: Procurement of Recovered Organic Waste Products

Compliant

None

Noncompliant

Section 18993.1. Recovered Organic Waste Product Procurement Target

Section 18993.2. Recordkeeping Requirements for Recovered Organic Waste Procurement Target

Section 18993.3. Recycled Content Paper Procurement Requirements

Section 18993.4. Recordkeeping Requirements for Recycled Content Paper Procurement

Article 13: Reporting

Compliant

Section 18994.1. Initial Jurisdiction Compliance Report

Section 18994.2. Jurisdiction Annual Reporting

Noncompliant

None

Article 14: Enforcement Requirements

Compliant

Section 18995.3. Jurisdiction Investigation of Complaints of Alleged Violations

Noncompliant

Section 18995.1. Jurisdiction Inspection Requirements

Section 18995.2. Implementation Record and Recordkeeping Requirements

Article 16: Administrative Civil Penalties

Compliant

Section 18997.1. Scope

Noncompliant

None

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

Mandatory Commercial Organics Recycling

The City of Cudahy is not implementing a Mandatory Commercial Organics Recycling program.

Mandatory Commercial Recycling

The City of Cudahy is not fully implementing a Mandatory Commercial Recycling program.

Public Resources Code, Division 30, Part 2

Source Reduction and Recycling Element

The City of Cudahy is not fully implementing a Residential Diversion Program.

The City of Cudahy is not implementing a Commercial Diversion Program, Construction and Demolition Debris, Recycled Content Procurement, or Education and Outreach Program.

Household Hazardous Waste Element

The City of Cudahy is not 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 Cudahy (Jurisdiction) implementation of and compliance with:

- Short-Lived Climate Pollutants (SLCP) (14 CCR sections 18981.1 through 18998.4).
- Mandatory Commercial Organics Recycling (MORE) (California Public Resources Code (PRC) sections 42649.8 through 42649.87).

- Mandatory Commercial Recycling (MCR) (PRC sections 42649-42649.7 and 14 CCR sections 18835-18839).
- 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. Evaluations also included observations on MORE, MCR, SRRE, and HHWE.
- 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 are 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.
- May 25, 2023, JACE followed up through (e-mail, phone call, Teams meeting) after the Jurisdiction did not respond to the request for access to the Jurisdiction's Implementation Record.
- June 8, 2023, the Jurisdiction provided access to its Implementation Record.
- October 18, 2023, the Jurisdiction and JACE staff met to review documentation that was missing from the Implementation Record and to request additional information.
- November 29, 2023, JACE staff conducted a field visit. JACE staff observed residential and commercial containers. See Field Visit Map for the Jurisdiction (Attachment 4) for locations where observations were made. JACE staff also visually observed loads at the two transfer stations:
 - Six (6) residential gray container loads

- Four (4) bulky waste loads
 - Two (2) curbside collection loads
 - One (1) residential blue container load
 - Two (2) commercial gray container loads
- On December 18, 2023, December 26, 2023, and January 3, 2024, JACE staff renewed the request for additional information from the Jurisdiction needed to complete the compliance evaluation. At the time of completion of this report, the Jurisdiction has not provided the requested information relevant to missing information in the IR and program/site details.
- November 6, 2024, JACE staff sent the Jurisdiction a draft findings report with the opportunity to provide feedback.
- November 14, 2025, the Jurisdiction responded to the draft findings report with no additional information being provided about programs that were found noncompliant in the report.
- Communications and other interactions took place with the Jurisdiction throughout the compliance evaluation, which included phone calls and email messages, site visit, and meetings.

Existing Jurisdiction Conditions

The Jurisdiction is in Los Angeles County. According to the 2021 U.S. Census, the Jurisdiction encompasses 1.23 square miles. The Jurisdiction has a population of 22,294 (Department of Finance, 2021). According to the Jurisdiction's base year history (1990), 49 percent of the Jurisdiction's total waste generation is from the residential waste stream and 51 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 hauler, Consolidated Disposal Services (Republic Services), with an exclusive franchise agreement to collect gray, blue, and green container materials for all residents and commercial businesses. Residents and commercial businesses are also allowed to self-haul their materials for recycling and disposal.

Materials collected in the Jurisdiction are taken to one of two transfer stations:

1. Republic Services Innovative Waste Transfer Station located in Vernon.
2. Republic Services Bel-Art Transfer Station located in Long Beach.

Gray container material is comingled with other jurisdictions' material, loaded in transfer trailers, and disposed at Sunshine Canyon Landfill.

Blue container material is mixed with other jurisdictions' recyclables, loaded in transfer trailers, and processed at Puente Hills Material Recovery Facility (MRF).

Green container material is mixed with other jurisdictions' organic material, loaded in transfer trailers, and taken to CVT Anaheim for processing.

Self-hauls have access to multiple facilities in the Southern California area.

The Jurisdiction does not provide for mixed 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 has not produced evidence of any contracts or agreements for any designations made.
Civil penalties not designated to a private entity. [18981.2(d)]	The Jurisdiction has not reported collection of civil penalties to a private entity.
Copies of designee agreements and contracts included in the Implementation Record. [18981.2(e)]	The Jurisdiction has not reported designating any responsibilities to any party.

Article 3: Organic Waste Collection Services

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

Finding: Noncompliant

The Jurisdiction has not implemented a three-container collection system for both residential and commercial waste generators.

The Jurisdiction's Implementation Record indicated that 1,982 residential generators have gray containers, 1,946 have blue containers, and one (1) has a green container. For the commercial generators, the Jurisdiction did not provide the number of commercial generators that have gray or blue containers. The Jurisdiction's Implementation Record indicated that eight (8) commercial generators have green containers.

During the JACE staff field investigation, it was confirmed that not all residential and commercial organic waste generators had been provided with the required three containers.

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

Finding: Noncompliant

As noted in the findings for 14 CCR Section 18984.1, the Jurisdiction has not implemented a three-container system. The records provided do not match the collection system observed at the time of the evaluation.

See Table 2 below for specific documentation required in the Implementation Record.

Table 2

Implementation Record Requirements	Received	Findings
A description of which collection method(s) are used (3+, 3-, 2-, and/or 1-container collection system). [18984.4(a)(1)]	Yes	The Jurisdiction provided a description of a three-container collection system. The three-container collection system has not been implemented.
The geographical area for each collection method. [18984.4(a)(2)]	Yes	The Jurisdiction provided documentation to support the geographical area where a three-container collection method will be implemented. The three-container collection system has not been implemented.

<p>If the jurisdiction is using a service that requires the contents of containers provided by the jurisdiction to be transported to a high diversion organic waste processing facility (HDOWPF), the jurisdiction shall at a minimum: [18984.4(a)(3)]</p> <ul style="list-style-type: none"> • List of all HDOWPFs used by jurisdiction. [18984.4(a)(3)(A)] • List of all approved haulers allowed to take organic waste to identified HDOWPFs. [18984.4(a)(3)(B)] • The geographical area the hauler(s) services, the routes serviced, or a list of addresses served. [18984.4(a)(3)(C)] 	<p>No</p>	<p>The Jurisdiction is not implementing a three-container system, including not providing the necessary containers to all applicable generators or implementing any of the requirements in 14 CCR Section 18995.1(a-d), and continues to use a two or unsegregated single container system (both of which require a list of HDOWPFs or a list of approved haulers to take organic waste to identified HDOWPFs). The Jurisdiction did not provide a list.</p> <p>The Jurisdiction provided documentation to support the geographic areas for the collection method.</p>
<p>Copies of written notification received from each facility that allows compostable plastics to be placed in the green container to be recovered. [18984.4(a)(4)]</p>	<p>N/A</p>	
<p>Copies of written notification received from each facility that allows organic waste to be placed in plastic bags and indicating that the facility(ies) can process and remove plastic bags when it recovers source separated organic waste. [18984.4(a)(5)]</p>	<p>N/A</p>	

14 CCR Section 18984.5. Container Contamination Minimization

Finding: Noncompliant

The Jurisdiction's Implementation Record indicates that route reviews and waste evaluations are conducted for container contamination minimization. However, the Jurisdiction did not provide any documentation to show that route reviews or waste evaluations have been conducted. During discussions with the Jurisdiction on October 18, 2023, the Jurisdiction confirmed that no route reviews or waste evaluations have been conducted (14 CCR Section 18984.5(b-c)).

JACE staff's field visit photo report (Attachment 3) and field visit map (Attachment 4) show examples and locations of JACE staff's observations of containers with prohibited contaminants. During JACE staff's field investigation of the containers that were deployed, the following was observed:

- Residential sector containers:

- 91 gray containers
 - 79 of the 91 containers had contaminants
- 45 blue containers
 - 39 of the 45 containers had contaminants
- Zero (0) green containers
- Commercial sector containers:
 - 25 gray containers
 - 25 of the 25 containers had contaminants
 - Zero (0) blue containers
 - Zero (0) green containers

14 CCR Section 18984.6. Recordkeeping Requirements for Container Contamination Minimization

Finding: Noncompliant

The Jurisdiction's Implementation Record does not contain 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	Findings
A description of the jurisdiction's process for determining the level of container contamination. [18984.6(a)(1)]	Yes	The Jurisdiction provided a description of the Jurisdiction's process for determining the level of container contamination.
Documentation of route reviews conducted, including identifying information for the subject or subjects of the route review. [18984.6(a)(2)]	No	The Jurisdiction's Implementation Record did not contain these documents. The Jurisdiction indicated that no reviews were completed.

<p>Documentation of waste evaluations performed, including: [18984.6(a)(3)]</p> <ul style="list-style-type: none"> • 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)] 	No	The Jurisdiction's Implementation Record did not contain these documents. The Jurisdiction indicated that no evaluations were completed.
Copies of notices issued to generators with prohibited container contaminants. [18984.6(a)(4)]	No	The Jurisdiction's Implementation Record did not contain these documents. The Jurisdiction indicated that no evaluations or reviews were completed, and no notices were issued.
Documentation of the number of containers where the contents were disposed. [18984.6(a)(5)]	No	The Jurisdiction's Implementation Record did not contain these documents. The Jurisdiction indicated that no evaluations or reviews were completed.

14 CCR Section 18984.7. Container Color Requirements

Finding: Not applicable

Compliance with this section could not be evaluated as only older functional containers were observed.

14 CCR Section 18984.8. Container Labeling Requirements

Finding: Not applicable

Compliance with this section could not be evaluated as only older functional containers were observed.

14 CCR Section 18984.11. Waivers Granted by a Jurisdiction

Finding: Compliant

While the Jurisdiction has a process to issue waivers, the Jurisdiction has not issued any waivers.

14 CCR Section 18984.13. Emergency Circumstances, Abatement, Quarantined Materials and Federally Regulated Waste

Finding: Not applicable

The Jurisdiction has not reported equipment or operational failure, 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 a written description of how waivers will be issued and validated. The Jurisdiction reported not issuing any waivers and there are no records of the issued waivers in the Jurisdiction's Implementation Record. The Jurisdiction has not reported sediment debris disposal, homeless encampment or illegal disposal cleanup, or quarantined organic waste that was disposed per 14 CCR Section 18984.13.

Article 3 Electronic Annual Report Findings

In the Jurisdiction's Electronic Annual Report (EAR), for reporting year 2022, the Jurisdiction reported providing a 3+, 3-, 2-, and 1-container collection system to residential and commercial generators. A three-container collection system should be the only selection for residential and commercial generators in the EAR consistent with the Jurisdiction's adopted ordinance. For reporting year 2022, zero (0) route reviews were reported as being conducted. For the 2021 and 2022 EAR the Jurisdiction reported zero (0) waivers being issued.

Article 4: Education and Outreach

14 CCR Section 18985.1. Organic Waste Recovery Education and Outreach

Finding: Noncompliant

No evidence was provided indicating that the Jurisdiction has provided education and outreach information that is consistent with the collection system approved in the

Jurisdiction's adopted ordinance. No evidence was provided indicating that education and outreach was provided to generators regarding the donation of edible food or the option to self-haul organic waste.

See Table 4 below for specific information about the Jurisdiction's organic waste recovery education and outreach program implementation.

Table 4

Program Requirements	Compliance	Findings
Information on the organic waste generator's requirements to properly separate materials in appropriate containers was provided to organic waste generators annually. [18985.1(a)(1)]	No	Information distributed described a three-container system which is not the system being utilized; therefore, generators are not being given information on how to properly separate in the appropriate containers that were provided.
Information on methods for prevention of organic waste generation was provided to organic waste generators annually. [18985.1(a)(2)]	No	The Jurisdiction did not provide evidence to support information is provided regarding the prevention of organic waste generation.
Information regarding the methane reduction benefits of reducing the landfill disposal of organic waste and the methods of organic waste recovery the organic waste collection service uses was provided to organic waste generators annually. [18985.1(a)(3)]	Yes	The Jurisdiction provided evidence that contains this information.
Information regarding how to recover organic waste and a list of approved haulers was provided to organic waste generators annually. [18985.1(a)(4)]	Yes	The Jurisdiction provided evidence that contains this information.
Information related to the public health and safety and environmental impacts associated with the landfill disposal of organic waste was provided to organic waste generators annually. [18985.1(a)(5)]	Yes	The Jurisdiction provided evidence that contains this information.

Information regarding programs for the donation of edible food was provided to organic waste generators annually. [18985.1(a)(6)]	No	The Jurisdiction did not provide evidence to support information is provided regarding the donation of edible food.
If the jurisdiction allows generators subject to its authority to self-haul organic waste, information regarding self-hauling requirements was provided to organic waste generators annually. [18985.1(a)(7)]	No	The Jurisdiction allows for self-haul in its ordinance but has provided no evidence to support how generators are notified of the requirements.
Information was provided through print or electronic media. [18985.1(c)]	Yes	The Jurisdiction provided evidence that information is provided through print or electronic media.
Educational materials were translated into any non-English language spoken by a substantial number of the public that are provided organic waste collection services by the jurisdiction. [18985.1(e)]	Yes	Educational materials are translated in Spanish which is a language used by much of the population of the Jurisdiction.

14 CCR Section 18985.2. Edible Food Recovery Education and Outreach

Finding: Noncompliant

No evidence was provided indicating that the Jurisdiction has implemented any of the requirements in this section (14 CCR Section 18985.2(a-b)).

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

Finding: Noncompliant

The Jurisdiction's Implementation Record did not contain all the records required by Section 18985.3. The records provided by the Jurisdiction did not contain specifics on the dissemination of education and outreach materials.

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

Table 5

Implementation Record Requirements	Received	Findings
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Copies of flyers, brochures, newsletters, invoice messaging, and website and social media posts. [18985.3(a)(1)]	No	Copies of education and outreach materials were not in the Jurisdiction's Implementation Record.
The date, and to whom the information was disseminated, or direct contact was made. [18985.3(a)(2)]	No	The Jurisdiction did not indicate or document when or to whom the education and outreach materials are disseminated.
If a jurisdiction provides mass distribution through mailings, or bill inserts, provide the date, a copy of the information, and the type and number of accounts receiving the information. [18985.3(a)(2)]	No	The Jurisdiction did not indicate or document the distribution of education and outreach materials.
If using electronic media solely provide a copy, with dates posted, of social media posts, e-mails, or other electronic messages. [18985.3(a)(3)]	No	The Jurisdiction did not indicate or document the posting of education and outreach materials.
If relying on a designee, a copy of the materials distributed by the designee. [18985.3(a)(4)]	Yes	Education and outreach materials from Republic Services were part of the Jurisdiction's Implementation Record. However, the Jurisdiction has not produced evidence of any contracts or agreements for any designations to be made.

Article 4: Electronic Annual Report Findings

Based on the 2022 EAR, there are 1,964 generators that have been provided with required information on collection. The Jurisdiction reported only one (1) commercial edible food generator that has been provided information regarding the Jurisdiction's edible food recovery program. This is inconsistent with JACE staff observations in the field in which two (2) Tier 1 commercial edible food generators were observed.

Article 7: Regulation of Haulers

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

Finding: Noncompliant

No evidence was provided indicating that the Jurisdiction has implemented any of the requirements in this section (14 CCR Section 18988.1(a-b)).

14 CCR Section 18988.4. Recordkeeping Requirements for Compliance with

Jurisdiction Hauler Program

Finding: Noncompliant

The Jurisdiction's Implementation Record does not contain the records required by Section 18988.4.

See Table 6 below for specific documentation required in the Implementation Record.

Table 6

Implementation Record Requirements	Received	Findings
Ordinances, contracts, franchise agreements, policies, procedures, or programs relevant to regulation of haulers. [18988.4(a)(1)]	No	The Jurisdiction's Implementation Record did not contain these documents.
<p>A description of the jurisdiction's hauler program including: [18988.4(a)(1)]</p> <ul style="list-style-type: none">• 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)]	No	<p>The Jurisdiction did not provide documents demonstrating:</p> <ul style="list-style-type: none">• types and conditions of approvals per type of hauler and criteria for approvals, denials and revocations,• process for issuing, revoking, and denying written approvals, and• any requirements associated with self-hauling and back-hauling. <p>The Jurisdiction did provide documentation to support a three-container collection system, but the Jurisdiction has reported not implementing a three-container collection system.</p>
<p>Record of hauler compliance with local ordinance(s) and requirements including: [18988.4(a)(3)]</p> <ul style="list-style-type: none">• 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)]	No	The Jurisdiction's Implementation Record did not contain these records.

All records include the date of action, name of hauler, and the type of action taken by the jurisdiction. [18988.4(b)]	No	The Jurisdiction's Implementation Record did not contain these records.
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Article 7: Electronic Annual Report Findings

For the 2022 EAR the Jurisdiction reported one (1) hauler was 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: Noncompliant

No evidence was provided indicating that an ordinance was adopted that requires compliance with the California Green Building Standards Code, California Code of Regulations, Title 24, Part 11 as amended July 1, 2019, and effective January 1, 2020, for Section 4.408.1 Construction Waste Management Residential and Section 5.408.1 Construction Waste Management non-residential.

14 CCR Section 18989.2. Model Water Efficient Landscape Ordinance

Finding: Compliant

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

Article 8 Electronic Annual Report Findings

No information regarding the ordinance was found the 2022 EAR. In the 2022 EAR, the Jurisdiction reported zero (0) CALGreen or Model Water Efficient Landscape projects.

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, or 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: Noncompliant

The Jurisdiction has provided evidence to support that an edible food recovery ordinance has been adopted. No evidence was provided indicating that an edible food recovery program has been implemented.

See Table 7 below for specific information about the Jurisdiction's edible food recovery program implementation.

Table 7

Program Requirements	Compliance	Findings
Educate commercial edible food generators. [18991.1(a)(1)]	No	The Jurisdiction did not provide evidence to support that all commercial edible food generators were educated annually. See details in Article 4 above.
Increase commercial edible food generator access to food recovery organizations and services. [18991.1(a)(2)]	No	The Jurisdiction did not provide evidence to support that an edible food recovery program has been implemented.
Monitor commercial edible food generators compliance. [18991.1(a)(3)]	No	The Jurisdiction did not provide evidence to support that an edible food recovery program has been implemented.

Increase edible food recovery capacity. [18991.1(a)(4)]	Yes	The Jurisdiction is part of Los Angeles County's edible food recovery capacity planning and was not identified as needing to submit an implementation schedule to CalRecycle.
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14 CCR Section 18991.2. Recordkeeping Requirements for Jurisdiction Edible Food Recovery Program

Finding: Noncompliant

The Jurisdiction's Implementation Record does not contain records required by Section 18991.2.

Article 10 Electronic Annual Report Findings

For the 2022 EAR, the Jurisdiction reported one (1) commercial edible food generator. The Jurisdiction reported having one (1) food recovery organization or service 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 organic waste recycling capacity and was not identified by Los Angeles County as needing to submit an implementation schedule.

14 CCR Section 18992.3. Schedule for Reporting

Finding: Not applicable

The Jurisdiction did not need 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 (ROWP) procurement target for 2022. The Jurisdiction has a procurement target of 1,900 ROWP units. In the 2022 EAR, the Jurisdiction reported procuring 200 ROWPs which included procuring mulch. The Jurisdiction did not provide evidence that a mulch ordinance or enforceable mechanism was adopted as required by Section 18993.1(f)(4)(A).

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

Finding: Noncompliant

The Jurisdiction's Implementation Record does not contain records required by Section 18993.2.

14 CCR Section 18993.3. Recycled Content Paper Procurement Requirements

Finding: Noncompliant

No evidence was provided indicating that the Jurisdiction procured paper products meeting recycled content requirements pursuant to Public Contract Code 22150 – 22154, besides printing and writing paper.

See Table 8 below for details on the Jurisdiction's paper procurement program implementation.

Table 8

Program Requirements	Compliance	Findings
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Procured paper products, and printing and writing paper meeting recycled content requirements of section 22150-22154. [18993.3(a)]	No	<p>The Jurisdiction did not provide evidence to support paper products meeting the recycled content requirements.</p> <p>The Jurisdiction did provide evidence to support printing and writing paper meeting the recycled content requirements.</p>
Paper products and printing and writing paper shall be deemed eligible to be labeled with an unqualified recyclable label as defined in 16 Code of Federal Regulations section 260.12 (January 1, 2013). [18993.3(b)]	No	The Jurisdiction did not provide evidence that paper products and printing and writing paper were deemed eligible to be labeled with an unqualified recyclable label.
Required all businesses from whom it purchases paper products to certify requirements in writing. [18993.3(c)]	No	The Jurisdiction did not provide evidence that it required all businesses where it had purchased paper products from to certify the minimum percentage of postconsumer material or that the product is eligible to be labeled with an unqualified recyclable label.

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

Finding: Noncompliant

The Jurisdiction's Implementation Record does not contain the records required by Section 18993.4.

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

Table 9

Implementation Record Requirements	Received	Findings
Copies of invoices, receipts or other proofs of purchase that describe the procurement of paper products by volume and type for all paper purchases. [18993.4(a)(1)]	No	The Jurisdiction did not provide documentation for all paper purchases.
Copies of all certifications or other verification required under 14 CCR Section 18993.3. [18993.4(a)(2)]	No	The Jurisdiction did not provide documentation of certifications or other verification except for printing and writing paper.

Article 12 Electronic Annual Report Findings

The Jurisdiction has a procurement target of 1,900 ROWP units. In the 2022 EAR, the Jurisdiction reported procuring 200 ROWPs. The Jurisdiction has reported mulch as part of its procurement program and has not indicated having a mulch ordinance.

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 has 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: Noncompliant

No evidence was provided indicating that the Jurisdiction has implemented any of the requirements in this section (14 CCR Section 18995.1(a-d)).

14 CCR Section 18995.2. Implementation Record and Recordkeeping Requirements

Findings: Noncompliant

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

See Table 10 below for Implementation Record program requirements.

Table 10

Program Requirements	Compliance	Findings
All records are maintained in the Implementation Record. [18995.2(a)]	No	See details in Table 16 below.
Stored in one central location, physical or electronic. [18995.2(b)]	No	The Jurisdiction does not have one central location for the storage of its Implementation Record.
Access was provided within ten business days. [18995.2(c)]	No	The Jurisdiction did not provide access to the Implementation Record within ten business days.
Includes records within 60 days of their creation. [18995.2(d)]	Yes	The Jurisdiction included records that were created within 60 days in its Implementation Record.
Retains all records for five years. [18995.2(e)]	Yes	The Jurisdiction has retained records created since beginning of 2022.

See Table 11 below for specific documentation required in the Implementation Record.

Table 11

Implementation Record Requirements	Received	Findings
Copy of all ordinances or enforceable mechanisms, contracts, and agreements. [18995.2(f)(1)]	No	<p>The Jurisdiction did not provide:</p> <ul style="list-style-type: none"> CALGreen ordinance (demonstrating compliance with the California Green Building Standards Code, California Code of Regulations, Title 24, Part 11 as amended July 1, 2019, and effective January 1, 2020, for Section 4.408.1 Construction Waste Management Residential and Section 5.408.1 Construction Waste Management non-residential) Mulch ordinance (14 CCR Section 18993.1(f)(4)(A)).

Written description of the jurisdiction's inspection and enforcement program. [18995.2(f)(2)]	Yes	The Jurisdiction provided a written description of the Jurisdiction's inspection and enforcement program.
All organic waste collection service records. [18995.2(f)(3)]	No	See details in Article 3 above.
All contamination minimization records. [18995.2(f)(4)]	No	See details in Article 3 above.
All waiver and exemption records. [18995.2(f)(5)]	Yes	See details in Article 3 above.
All education and outreach records. [18995.2(f)(6)]	No	See details in Article 4 above.
All hauler program records. [18995.2(f)(7)]	No	See details in Article 7 above.
All jurisdiction edible food recovery program records. [18995.2(f)(8)]	No	See details in Article 10 above.
All recovered organic waste procurement target records. [18995.2(f)(9)]	No	See details in Article 12 above.
All recycled content paper procurement records. [18995.2(f)(10)]	No	See details in Article 12 above.
All inspection documents. [18995.2(f)(11)]	No	See details in Article 14 above.
All complaint and investigation records. [18995.2(f)(13)]	N/A	N/A. See Table 18 below for more details.

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

Finding: Compliant

The Jurisdiction provided procedures that will be followed for the receipt and investigation of complaints, as well as information required to be submitted for a complaint.

See Table 12 below for specific information about the Jurisdiction's investigation of complaints program implementation.

Table 12

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 a written description in the Implementation Record.
Allows for the submission of anonymous complaints. [18995.3(a)]	Yes	The Jurisdiction's complaint process allows for anonymous complaints.
<p>The procedure provides complaints be in writing and include the following information: [18995.3(b)]</p> <ul style="list-style-type: none"> • 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 allows for complaints in writing and allows for all required information.
Provides a procedure to notify complainants of results. [18995.3(d)]	Yes	The Jurisdiction provided the procedure in the Implementation Record.
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)]	Yes	The Jurisdiction did not report receiving any complaints; therefore, no records of complaints 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

For the 2022 EAR, the Jurisdiction reported one (1) inspection was conducted on a Tier One commercial edible food generator. The Jurisdiction's Implementation Record did not contain the documentation of the inspection. For the 2022 EAR, the Jurisdiction reported zero (0) complaints were received.

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 not fully implemented its Mandatory Commercial Organics Recycling program.

The Jurisdiction has not provided evidence or reported that commercial businesses have been notified of their noncompliance.

MORe Electronic Annual Report Findings

In the Jurisdiction's 2022 EAR, it is reported that out of 186 commercial businesses that are required to recycle organics, zero (0) are recycling organics. This is a compliance rate of zero (0) percent. The Jurisdiction has not provided documentation or reported that the 186 commercial businesses not recycling are self-hauling organic material for diversion.

Mandatory Commercial Recycling (MCR)

PRC Section 42649.3 and 14 CCR Section 18838

The Jurisdiction has not fully implemented its Mandatory Commercial Recycling program.

The Jurisdiction has not provided evidence or reported that commercial businesses not recycling have been notified of their noncompliance.

MCR Electronic Annual Report Findings

In the Jurisdiction's 2022 EAR, it is reported that out of 250 businesses required to recycle, 50 are recycling. This is a compliance rate of 20 percent. The Jurisdiction has not provided documentation or reported that the remaining 200 commercial businesses not recycling are self-hauling recyclable materials for diversion.

Source Reduction Recycling Element Program (SRRE)

Residential Diversion Program

The Jurisdiction has not provided evidence or reported full implementation of a residential diversion program.

In the Jurisdiction's 2022 EAR, the Jurisdiction reported no changes to any SRRE-selected diversion programs. The Jurisdiction has nine (9) thrift shops in or near the Jurisdiction for the donation of unwanted goods and at least three (3) flea markets that residents can participate in. There are 10 beverage container buy-back drop-off locations in the area.

No residential green container loads were observed due to the Jurisdiction not having a separate route for the collection of organic material.

On November 29, 2023, JACE staff viewed gray and blue container loads. In total, seven (7) residential loads were viewed.

JACE staff evaluated 45 blue carts and observed an average contamination rate of 27.4 percent. JACE staff observed and evaluated one (1) blue container load. The load observed contained approximately 30 percent prohibited container contaminants with most notably plastic film, green waste, and wood waste. Blue container loads did contain organic material (paper products and printing and writing paper). Wood, dry lumber, and textiles are not allowed in the blue container.

JACE staff evaluated 91 gray carts and observed an average contamination rate of 29.7 percent. Staff observed and evaluated six (6) gray container loads, with four (4) loads being the Jurisdiction's bulky waste pickup, and two (2) being from the curbside collection program. The bulky waste loads contained approximately 45 percent divertible materials. The most significant materials being green waste, wood waste, and cardboard. The gray container loads contained approximately 50 percent divertible materials. These loads were wet indicating a significant amount of organic waste (food scraps) and green waste, in addition to non-organic recyclables.

See SLCP Article 3 section above for more information.

Commercial Diversion Program

The Jurisdiction has not provided evidence or reported full implementation of a commercial diversion program.

No commercial green container loads were observed due to the Jurisdiction not having a separate route for the collection of organic material.

On November 29, 2023, JACE staff viewed gray container loads. In total, two (2) commercial gray container loads were viewed.

JACE staff were unable to evaluate any commercial blue containers due to limited access at commercial businesses. Additionally, the Jurisdiction did not report when commercial recycling is collected. No commercial blue container loads were viewed or evaluated by JACE staff.

JACE staff evaluated 25 gray containers and observed an average of 42.3 percent prohibited container contaminants. JACE staff observed and evaluated two (2) gray container loads. JACE staff observed approximately 40 percent divertible materials. These loads were wet indicating a significant amount of organic waste (food scraps) and green waste, in addition to non-organic recyclables.

See SLCP Article 3 section above for more information.

Construction and Demolition Debris

The Jurisdiction has not provided evidence or reported full implementation of a construction and demolition debris diversion program.

Recycled Content Procurement

The Jurisdiction has not provided evidence or reported full implementation of a recycled content procurement program.

See SLCP Article 12 section above for more information.

Education and Outreach

The Jurisdiction has not provided evidence or reported full implementation of an education and outreach program.

See SLCP Article 4 section above for more information.

Household Hazardous Waste Element Program (HHWE)

The Jurisdiction has not provided evidence or reported full implementation of a household hazardous waste program. JACE staff found limited information on Los Angeles County's household hazardous waste webpage that was specific for the Jurisdiction and the Jurisdiction did not provide any additional information to support program implementation.

Additional Information

Attachments

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

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