

**The Department's Consideration of Staff's Recommendation that the  
City of Wasco has Completed the Terms of  
Compliance Order CO 016-001 Regarding its Implementation of its  
Source Reduction and Recycling Element (SRRE) and the  
Mandatory Commercial Recycling (MCR) Law**

State of California  
Department of Resources Recycling and Recovery

**September 15, 2020  
Byron Sher Auditorium**

**ISSUE**

The City of Wasco (City) has reported to the Department of Resources Recycling and Recovery (Department) the implementation of Compliance Order CO 016-001 (Compliance Order) (Attachment 1). The City reported its progress in the Annual Report and through the quarterly status reports required by the Compliance Order. In addition, Department staff conducted site visits to verify and monitor the City's program implementation during the Compliance Order.

This staff report and its attachments present the Department's evaluation of the City's fulfillment of the Compliance Order and present options for consideration.

**ITEM HISTORY**

In 2013, the Department conducted a review of the City's implementation of, and compliance with, its Source Reduction and Recycling Element (SRRE) programs and compliance with California Public Resources Code (PRC) section 41780, as well as California's Recycling of Commercial Solid Waste law, referred to as the Mandatory Commercial Recycling (MCR) law (PRC sections 42649 to 42649.7 and Title 14 California Code of Regulations (CCR) sections 18835 to 18839). The Department identified deficiencies within the 2016 Waste Evaluation and Enforcement Branch Staff Report Summary of the City of Wasco's Compliance Review and Consideration of the Issuance of Compliance Order CO 016-001 (Attachment 2) that demonstrated the City had not adequately implemented its SRRE programs and had not made a good faith effort to comply with the requirements of the MCR law.

On October 18, 2016, the Department held a public hearing to consider the issuance of the Compliance Order. Based upon the oral testimony presented and the information contained in the public hearing package, the Department found that the City did not adequately implement its SRRE and MCR programs and issued the Compliance Order.

The Compliance Order required the City to work with the Department to develop a Local Implementation Plan (LIP), submit a fully executed LIP to the Department by April 28,

2017 (Attachment 3), and implement the programs identified in the LIP by April 30, 2018. As part of the Compliance Order the Department would monitor the City's continued implementation of the programs identified in the LIP from May 1, 2018 through April 30, 2019.

On April 18, 2017, the City submitted and the Department approved a request for an extension from April 28, 2017 to August 31, 2017 to submit a fully executed LIP (Attachment 4). The approval also extended the implementation period from April 30, 2018 to August 31, 2018, and extended the monitoring period from May 1, 2019 to September 1, 2019.

On June 19, 2017, the City submitted and the Department approved a second request for an extension from August 31, 2017 to October 31, 2017 to submit a fully executed LIP (Attachment 5). The approval also extended the implementation period from August 31, 2018 to October 31, 2018, and extended the monitoring period from September 1, 2019 to November 1, 2019. (Attachment 3).

On September 2, 2020, the Department notified the City of its intent to present its recommendations regarding the City's Compliance Order at the Department's September 2020 monthly public meeting (Attachment 6).

### **OPTIONS FOR CONSIDERATION**

1. Find that the City has complied with the requirements of the Compliance Order and has made a good faith effort to implement its SRRE programs and comply with the requirements of the MCR law.
2. Find that the City has failed to comply with the requirements of the Compliance Order. Direct Department staff to schedule a public hearing to consider the imposition of administrative civil penalties for failure to comply with the Compliance Order.
3. Find that the City is not adequately implementing its SRRE programs but is adequately complying with the MCR law. Direct staff to schedule a public hearing to address only SRRE program implementation, and/or incorporating alternate or additional conditions.
4. Find that the City is adequately implementing its SRRE programs and not complying with the MCR law. Direct staff to schedule a public hearing to address only MCR program implementation and/or incorporating alternate or additional conditions.

### **STAFF RECOMMENDATION**

Department staff recommends Option 1: Find that the City has complied with the requirements of the Compliance Order and has made a good faith effort to implement its SRRE programs and comply with the requirements of the MCR law. This recommendation is based on information provided by the City within its Annual Reports, quarterly status reports, and Department staff's field observations (Attachment 7).

Approving the completion of the City's Compliance Order will commence the transfer of the City from the Jurisdiction Compliance Unit (JCU) back to the Local Assistance and Market Development (LAMD) Branch. The LAMD Branch will review the City in the next two-year Jurisdictional review cycle. However, at any time the Department receives information demonstrating that the City is not continuing to implement its SRRE programs and/or MCR programs, the Department can conduct a new review of the City's SRRE and/or MCR implementation.

## **ANALYSIS**

### **Existing Jurisdiction Conditions**

The City is an agricultural community in Kern County. According to the 2010 U.S. Census Bureau, the City encompasses 9.43 square miles. The City has a population of 27,955 (Department of Finance, 2019). Within the City's approved Source Reduction and Recycling Plan (dated 1990), 62.3 percent of the City's total waste generated is from the residential waste stream and 37.7 percent is from the non-residential waste stream.

The City's Public Works Department provides waste collection service for the residents and businesses. Residents and businesses in the City also have the option to self-haul waste and recyclables to the County's Shafter-Wasco Recycling and Sanitary Landfill (SWL). The City has an agreement with American Refuse to provide curbside recycling service for residents and on-site recycling service for businesses. American Refuse also services the community drop-off centers throughout the City and the City's community clean-up events.

The following summarizes the City's implementation of the LIP to address identified program gaps:

### **LIP Program Status**

#### **Residential Recycling Program**

##### *About the Program:*

The City has implemented a residential recycling program designed to divert residential solid waste from single-family residents. The City's residential recycling program consists of a voluntary curbside recycling program, and a self-haul program through community drop-off centers, community clean-up events, two California Redemption Values (CRV) centers, and the SWL. The City's residential recycling program targets paper types, cardboard, plastics (1-7), glass, aluminum, and metal.

##### *Facts and Observations Related to the Residential Curbside Recycling Program:*

- Following issuance of the Compliance Order, the City began coordinating with American Refuse to track and monitor the effectiveness of its residential curbside recycling program in order to identify opportunities to increase the collection of recyclables. The City's efforts include, but are not limited to, tracking and monitoring the following:

- The number of households participating in the City's curbside recycling program;
- The amount of curbside waste and recycling tonnage collected on a monthly basis; and
- Households with contamination within recycling containers.
- Prior to the issuance of the Compliance Order, the City reported 50 out of 3,245 households were subscribed to curbside recycling service through American Refuse. As of preparation of this report, 68 households are subscribed to curbside recycling service. The City has reported to JCU its plan to implement a mandatory residential curbside recycling program in an effort to increase collection of recyclables.
- In 2018, the City reported the collection of 25 tons of recyclables through the City's residential curbside recycling program. In 2019, the City reported collecting an increase of 11 tons of recyclables (a total of 36 tons) through the City's residential curbside recycling program. Through the second quarter of 2020, the City's residential curbside recycling program has collected 12 tons of recyclables.
- During JCU's field visits, JCU tracked and observed a reduction of recyclables within residential curbside waste carts and within residential waste loads at the SWL. JCU also observed a reduction of contamination within residential curbside recycling carts and within residential curbside recycling loads at American Refuse's transfer station.

*Facts and Observations Related to the Residential Self-Haul Program:*

- Following the issuance of the Compliance Order, the City coordinated with American Refuse to implement city-wide community drop-off centers. The City placed three, 40 cubic yard roll-off recycling containers in strategically chosen locations within the City to provide opportunities for residents to divert their recyclable material.
  - The City monitors the effectiveness of each community drop-off center by surveying participants, tracking the tonnage collected at each location, and monitoring contamination levels within roll-offs.
  - Through the City's surveys, the City has found that 90 percent of the participants utilizing the community drop-off centers are residents.
  - The City observed less than 10 percent contamination at the drop-off centers.
  - In 2018, the City diverted seven tons of recyclable material through the community drop-off centers. In 2019, the City reported 26 tons of recyclables were diverted through the City's community drop-off centers. Through the second quarter of 2020, the City's community drop-off centers have collected 17 tons of recyclables.
  - During JCU's field visits, JCU observed each of the City's community drop-off center locations and observed residents utilizing the drop-off centers to divert their recyclables. JCU also observed that the community drop-off center roll-offs contained less than 10 percent contamination.

- JCU observed that community drop-off center loads at American Refuse's transfer station contained less than 10 percent contamination.
- Prior to the issuance of the Compliance Order, the City was not coordinating with Kern County (County) to track and monitor the City's residential self-haul material at the SWL.
- Following issuance of the Compliance Order, the City developed a process to coordinate with the County. Through coordination, the City identified reporting and tracking errors which resulted in inaccurate amounts of waste and recycling tonnage being reported to the City regarding self-haul residents. The City worked with the County to address the reporting errors and developed a system to track and monitor the self-haul program at the SWL. The City is now tracking and monitoring:
  - Residential participation;
  - The amount of residential waste and recycling tonnage self-hauled to the SWL;
  - Regular observations of divertible materials within waste loads; and
  - Regular observations of contamination within recycling loads.
- During JCU's field visits, JCU observed the SWL scale house attendants spot checking incoming self-haul loads, obtaining origin information, and directing residents to the proper areas for diversion of recyclables.
- The City implemented bi-annual community clean-up events to provide residents an additional opportunity to recycle their divertible material. Since the inception of the program, the City has diverted 27 tons of recyclable material.
- The City began coordinating with the CRV centers in the City to receive reports on the amount of diversion occurring at the locations.

**Conclusion:**

*The City has implemented a residential recycling program that supports residential preference to either subscribe to curbside recycling collection or to self-haul recyclables. JCU's observations of the curbside recycling program and the self-haul program determined that participants effectively sorted and deposited recyclables in the proper collection bins. Throughout the Compliance Order, the City has tracked and monitored a steady increase in the amount of recyclables diverted through the City's residential recycling program. The City continues to evaluate and seek opportunities to improve and strengthen the City's residential recycling program, including the development of a plan to implement a mandatory residential curbside recycling program.*

**Commercial Recycling Program**

*About the Program:*

The City has implemented a commercial recycling program designed to divert commercial recyclables from businesses. The City's commercial recycling program consists of a voluntary on-site recycling collection program, and a self-haul program through the community drop-off centers, two CRV centers, and the SWL. The City's commercial

recycling program targets paper types, cardboard, plastics (1-7), glass, aluminum, and metal.

*Facts and Observations Related to the Commercial On-Site Recycling Collection Program:*

- Prior to the issuance of the Compliance Order, the City's commercial recycling program was limited to the collection of cardboard. Following the issuance of the Compliance Order, the City expanded the material types accepted in its commercial recycling program to include paper types, plastics (1-7), glass, aluminum, and metal.
- Following issuance of the Compliance Order, the City began coordinating with American Refuse to track and monitor the effectiveness of its commercial on-site recycling program in order to identify opportunities to increase the collection of recyclables. The City's efforts include, but are not limited to, tracking and monitoring the following:
  - The number of businesses participating in the City's commercial on-site recycling program;
  - The amount of on-site collection waste and recycling tonnage collected on a monthly basis; and
  - Businesses with contamination within recycling containers.
- Prior to issuance of the Compliance Order, the City reported that 45 businesses were subscribed to commercial on-site recycling through American Refuse. Upon implementation of the Compliance Order, the City is reporting 100 businesses are subscribed to commercial on-site recycling.
- In 2019, the City reported the collection of 193 tons of recyclable material through the commercial on-site recycling program. Through the second quarter of 2020, the City has reported collecting 143 tons of recyclable material.
- Throughout the Compliance Order, JCU tracked and observed a reduction of recyclable material within commercial waste bins and within commercial waste loads at the SWL. JCU also observed a reduction of contamination within commercial recycling bins and within commercial recycling loads at the American Refuse transfer station.

*Facts and Observations Related to the Commercial Self-Haul Program:*

- As discussed within the City's residential self-haul program (page 4), the City coordinated with American Refuse to implement city-wide community drop-off centers. The City placed three, 40 cubic yard roll-off recycling containers in strategically chosen locations within the City to provide opportunities for businesses to divert their recyclable material.
  - The City monitors the effectiveness of each community drop-off center by surveying participants, tracking the tonnage collected at each location, and monitoring contamination levels within roll-offs.

- Through the City's surveys, the City has found that 10 percent of the participants utilizing the community drop-off centers are commercial businesses.
- The City observed less than 10 percent contamination at the drop-off centers.
- In 2018, the City diverted seven tons of recyclable material through the community drop-off centers. In 2019, the City reported 26 tons of recyclables were diverted through the City's community drop-off centers. Through the second quarter of 2020, the City's community drop-off center program has collected 17 tons of recyclables.
- During JCU's field visits, JCU observed each of the City's community drop-off center locations and observed businesses utilizing the drop-off centers to divert their recyclables. JCU also observed that the community drop-off center roll-offs contained less than 10 percent contamination.
- JCU observed that community drop-off center loads at American Refuse's transfer station contained less than 10 percent contamination.
- Prior to the issuance of the Compliance Order, the City was not coordinating with the County to track and monitor the City's commercial self-haul material at the SWL.
- Following issuance of the Compliance Order, the City developed a process to coordinate with the County. Through coordination, the City identified reporting and tracking errors which resulted in inaccurate amounts of waste and recycling tonnage being reported to the City regarding self-haul businesses. The City worked with the County to address the reporting errors and developed a system to track and monitor the self-haul program at the SWL. The City is now tracking and monitoring:
  - Commercial participation;
  - The amount of commercial waste and recycling tonnage self-hauled to the SWL;
  - Regular observations of divertible materials within waste loads; and
  - Regular observations of contamination within recycling loads.
- During JCU's field visits, JCU observed the SWL scale house attendants spot checking incoming self-haul loads, obtaining origin information, and directing businesses to the proper areas for diversion of recyclables.
- The City began coordinating with the CRV centers in the City to receive reports on the amount of diversion occurring at the locations.

**Conclusion:**

*The City has implemented a commercial solid waste recycling program designed to divert commercial solid waste from businesses within the City through either subscribing to on-site recycling collection or self-hauling recyclables. JCU's observations of the on-site collection program and self-haul program determined that participants effectively sorted and deposited recyclables in the proper collection bins. The City monitors the effectiveness of the on-site collection program by coordinating internally, with the County,*

*and with American Refuse on a regular basis to receive reports on waste and recycling participation. The City also monitors commercial self-haul participation to maximize the diversion of recyclable materials.*

### **Government Procurement Program**

As outlined in PRC section 22150, "If fitness and quality are equal, each local public entity shall purchase recycled products, as defined in PRC section 12200, instead of non-recycled products whenever recycled products are available at the same or a lesser total cost than non-recycled items." Prior to the issuance of the Compliance Order, the City did not have a government procurement policy and JCU was not able to verify the City's compliance with PRC section 22150.

#### *Facts and Observations Related to the Government Procurement Program:*

- Following the issuance of the Compliance Order, the City developed and implemented an Environmentally Preferable Purchasing and Practices (EPPP) policy. The policy directs:
  - City departments to promote the use and purchase products manufactured with post-consumer recycled materials; and
  - Contractors and consultants to use and specify recycled products in fulfilling contractual obligations.
- During JCU's field visits, JCU was able to verify the City's purchasing of products that contain recycled content.

#### *Conclusion:*

*The City has developed an EPPP policy to support the City's implementation of PRC section 22150.*

### **Education and Outreach**

#### *About the Program:*

The City has developed a comprehensive recycling education and outreach program that contains accurate and up to date information regarding the City's diversion programs. The City's website, flyers, and brochures, list the recycling options available in the City, contact information for American Refuse, locations of the community drop-off centers, electronic copies of the City's waste and recycling print materials, and information on local waste and recycling events.

#### *Residential Recycling Program:*

- The City promotes its residential recycling program through flyers and brochures. These materials are made available at City facilities and electronically on the City's website.
- The City's website lists the materials accepted in the City's recycling program, information on how to sign up for residential curbside recycling service, and the locations of the City's community drop-off centers and CRV centers.



- The City developed a welcome packet that is distributed to new residents that includes information on the City's recycling programs.
- The City places information about its residential recycling programs in the local newspaper and within utility billing inserts every other quarter.
- During JCU's field visits, JCU found the flyers and brochures to be readily available at City facilities.

*Commercial Recycling Program:*

- The City promotes its commercial recycling program through flyers and brochures. These materials are available at City facilities and electronically on the City's website.
- The City's website lists the materials accepted in the City's recycling program, information on how to sign up for on-site recycling service, and the locations of the City's community drop-off centers and CRV centers.
- The City includes information on its commercial recycling program within the City's business license application and renewal packets.
- The City participates in business association meetings throughout the City to promote the City's recycling program on a quarterly basis.
- During JCU's field visits, JCU found the City's commercial recycling information available in business license packets and at City facilities.

*Government Procurement Program:*

- The City distributes a memorandum annually to all City departments that outlines the City's EPPP policy and directs City employees to purchase office supplies made of recycled post-consumer materials.

*Conclusion:*

*The City has developed education and outreach materials that reflect the City's programs and supports the implementation and effectiveness of its SRRE programs. The City is committed to distributing and providing education on its SRRE programs through the City's website, billing inserts, flyers and brochures, and making information available at City facilities.*

**Mandatory Commercial Recycling Program**

*About the Program:*

The City implemented a commercial solid waste recycling program designed to divert commercial solid waste from businesses and multi-family complexes. The City's MCR ordinance requires businesses that generate four cubic yards or more of waste per week (MCR businesses) and multi-family complexes of five or more units (MCR multi-family complexes) to arrange for recycling service with American Refuse or self-haul recyclables. The City's MCR program targets paper types, cardboard, plastics (1-7), glass, aluminum, and metal.

*Facts and Observations Related to the City's MCR Program:*

- Prior to the issuance of the Compliance Order, the City's MCR program was limited to the collection of cardboard only. Following the issuance of the Compliance Order, the City expanded the material types accepted in its MCR program to include paper types, plastics (1-7), glass, aluminum, and metal.
- Following the issuance of the Compliance Order, the City began coordinating with American Refuse to monitor commercial on-site recycling participation, the amount of recycling tonnage collected, and contamination levels in loads, in order to evaluate and make improvements to the City's MCR program.
- During JCU's field visits, JCU tracked and observed a reduction of divertible materials within MCR waste bins and within commercial waste loads at the SWL. JCU also observed a reduction of contamination within MCR recycling bins and within commercial recycling loads at American Refuse's transfer station.

*Conclusion:*

*The City has implemented a MCR commercial solid waste recycling program designed to divert commercial solid waste from businesses and multi-family complexes within the City that are subject to the MCR law.*

**MCR Identification**

A jurisdiction is required to identify businesses that dispose of four or more cubic yards of commercial solid waste per week and multi-family residential complexes of five units or more (Title 14 CCR section 18838 (a)(2)).

*Facts and Observations Related to MCR Identification:*

- Prior to issuance of the Compliance Order, the City did not have data on the number of MCR businesses and MCR multi-family complexes in the City, and did not have data on the number of MCR businesses and MCR multi-family complexes compliant with the City's MCR program.
- Following the issuance of the Compliance Order, the City identified MCR businesses and MCR multi-family complexes by compiling the City's data and coordinating with American Refuse to receive updated lists for those who have on-site recycling service. The City reviewed its own account list and American Refuse's account list to verify if:
  - Businesses and multi-family complexes met the MCR threshold;
  - MCR businesses and MCR multi-family complexes were within the City;
  - MCR businesses and MCR multi-family complexes were consistent with the City's records; and
  - Compliance status with MCR.
- The City consolidated its data on MCR businesses and MCR multi-family complexes, and the recycling data collected from American Refuse, into a master database. The information includes, but is not limited to: account name, account address, phone number, contact name, method of recycling, type of services subscribed to, bin size, number of bins, and frequency of pick-up.

- The City developed a business license process to identify new MCR businesses and MCR multi-family complexes. Those that meet the MCR threshold are required to participate in the City's MCR program and are contacted to verify participation. Business licenses require sign off by the City prior to approval, and the City has reported holding businesses licenses due to lack of information or if a business is not complying with the City's MCR program.
- The City allows businesses to self-haul their recyclables to comply with the City's MCR program. Self-haulers are identified through the business license process and are required to apply for a self-haul permit. Self-haulers are required to submit reports to the City on a quarterly basis regarding the type, weight, and destination of materials generated.
- The City is reporting a MCR business participation rate of 86 percent, with 107 out of 124 MCR businesses participating in the City's MCR program through the following:
  - 94 businesses are subscribed to on-site recycling collection service through American Refuse; and
  - 13 businesses are self-hauling recyclables.
- The City is reporting a MCR multi-family complex participation rate of 90 percent, with 29 out of 32 MCR multi-family complexes participating in the City's MCR program through subscription to on-site recycling collection service with American Refuse.

**Conclusion:**

*The City has developed a process to identify the businesses and multi-family complexes that are required to participate in the City's MCR program. This process relies on coordination with American Refuse to receive MCR business and MCR multi-family recycling account lists. The City also internally coordinates to cross verify data with the business licenses and self-haul permits on file, and to verify participation.*

**MCR Monitoring**

A jurisdiction is required to monitor businesses and multi-family complexes subject to the MCR law to determine whether they are recycling (Title 14 CCR section 18838 (a)(2)).

***Facts and Observations Related to MCR Monitoring:***

- To maintain accurate MCR records, the City:
  - Reviews records to determine which businesses and multi-family complexes are subject to the MCR law;
  - Monitors business license application and annual renewals to ensure compliance is maintained;
  - Receives updated MCR account lists from American Refuse which include recycling levels; and
  - Developed a tracking system to monitor and ensure self-haulers comply with the City's requirements of acquiring a self-haul permit and submitting

monthly self-haul reports to the City. The report includes but is not limited to: the types, weights, and destination of the generated material.

- The City provided JCU with quarterly MCR monitoring data. Table 1 shows the City's MCR program participation through the term of the Compliance Order.

**Table 1: MCR Program Participation Rates**

|  | <b>JCU<br/>Evaluation</b> | <b>2017</b>  | <b>2018</b>  | <b>2019</b>  | <b>2020</b>  |
|--|---------------------------|--------------|--------------|--------------|--------------|
| MCR Businesses   | Not available             | 117          | 116          | 121          | 124          |
| MCR Businesses Recycling                                   | Not available             | 53           | 64           | 92           | 107          |
| MCR Businesses Not Recycling                               | Not available             | 64           | 52           | 29           | 17           |
| <b>Percent of Compliant<br/>MCR Businesses</b>             | <b>Not available</b>      | <b>45.3%</b> | <b>55.2%</b> | <b>76.0%</b> | <b>86.3%</b> |
| MCR Multi-Family Complexes                                 | Not available             | 34           | 34           | 34           | 32           |
| MCR Multi-Family Recycling                                 | Not available             | 5            | 10           | 21           | 29           |
| MCR Multi-Family Not<br>Recycling                          | Not available             | 29           | 24           | 13           | 3            |
| <b>Percent of Compliant<br/>MCR Multi-Family Complexes</b> | <b>Not available</b>      | <b>14.7%</b> | <b>29.4%</b> | <b>61.7%</b> | <b>90.6%</b> |

**Conclusion:**

*The City developed and implemented a system to monitor MCR businesses and MCR multi-family complexes through reviewing City records, coordinating internally and with American Refuse, cross verifying records with business license data, reviewing self-haul data, and conducting verification.*

**MCR Notification of Noncompliance**

As outlined in PRC section 42649.3(d) a jurisdiction's solid waste recycling program shall include education, outreach to, and monitoring of, businesses. A jurisdiction is also required to notify those businesses and multi-family complexes that are not in compliance with PRC section 42649.2. Below outlines the City's efforts to comply with the notification requirement of the MCR law.

***Facts and Observations Related to Business and Multi-Family Complex Notification of Noncompliance:***

- The City developed a notification of noncompliance on City letterhead informing noncompliant MCR businesses and MCR multi-family complexes of their requirement to participate in the City's MCR program.
- In 2019, the City's code enforcement staff delivered notifications of non-compliance to accounts that were noncompliant with the City's MCR program.

- The City has reported the delivery of notification of noncompliance letters to non-compliant MCR accounts has been completed for 2020.
- The City stated that notifications of noncompliance will be distributed on an annual basis until full compliance is met.

**Conclusion:**

*The City developed and is implementing the MCR Notification of Noncompliance required by PRC section 42649.3(d). The City has reported it will send notifications of noncompliance on an annual basis or until full compliance is achieved.*

**MCR Education and Outreach**

***About the Program:***

The City developed an education and outreach program that reflects the City's MCR program. The City provides education and outreach to MCR businesses and MCR multi-family complexes about the City's MCR program and the MCR law.

***Facts and Observations Related to MCR Education and Outreach:***

- The City developed and distributes City-specific MCR information through direct mailings and in person at the business license counter at City Hall.
- The City includes information on its MCR program within the City's business license application and renewal packets.
- The City's website is updated and maintained to reflect the City's MCR program, including providing information on recycling options, locations of community drop-off centers, and American Refuse contact information.
- The City gives presentations on the City's MCR program and answers MCR related questions during annual community events and civic association meetings.
- The City conducts site visits to MCR businesses and MCR multi-family complexes that are non-compliant and provides education and outreach on how to comply with the City's program.

**Conclusion:**

*The City has developed MCR education and outreach materials that reflect the City's MCR program. The City is committed to distributing education annually through presentations, mailings, over the counter with business permits, and within the City's business license application and renewal packets.*

**Quarterly and Annual Reporting Requirements**

***Facts and Observations Related to Quarterly and Annual Reporting Requirements:***

- The City submitted quarterly status reports which included the implementation status of the programs in the LIP.
- The City's Annual Report reflected the City's efforts regarding its SRRE and MCR program implementation, identification, monitoring, education and outreach, and distributing notifications of noncompliance.

- The City developed and maintained a compliance documentation binder. The binder contains records related to the development and implementation of the LIP. The binder and records were observed by JCU during field visits.

**Conclusions:**

*The City has implemented the quarterly status report and annual reporting requirements within the LIP per the Compliance Order schedule.*

**FINDINGS**

After analyzing the City's reports and monitoring the City's program development, JCU determined that the City implemented the LIP, complied with the Compliance Order, and made reasonable and feasible efforts to implement its SRRE programs and meet the requirements of the MCR law. This finding is based on information provided by the City within its Annual Report, quarterly status reports, and verified through field observations by JCU.

The City has committed to the Department its intentions to continue to evaluate and seek improvements to implement its SRRE and MCR programs.

**ATTACHMENTS**

1. Compliance Order No. IWMA BR09-003
2. 2016 Waste Evaluation and Enforcement Branch Staff Report Summary of the City of Wasco's Compliance Review and Consideration of the Issuance of Compliance Order CO 016-001
3. City of Wasco Local Implementation Plan
4. Consideration of the City of Wasco's Time Extension Request to the Due Dates of Compliance Order No. CO 016-001, April 2017
5. Consideration of the City of Wasco's Time Extension Request to the Due Dates of Compliance Order No. CO 016-001, June 2017
6. Notice of Department Staff's Intent to Recommend Completion of Compliance Order CO 016-001 for the City of Wasco
7. Photo Report for the City of Wasco

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