



Rural Counties
Environmental Services
Joint Powers Authority

ESJPA

Board of Directors Meeting

**Thursday
October 16, 2025
9:00 A.M.**

**1215 K St., Suite 1650
Sacramento, CA 95814
916-447-4806**



**Rural Counties
Environmental Services
Joint Powers Authority**

ESJPA

CHAIR — LORI PARLIN, EL DORADO COUNTY
VICE CHAIR — RHONDA DUGGAN, MONO COUNTY
EXECUTIVE DIRECTOR — PATRICK BLACKLOCK

TECHNICAL ADVISORY GROUP (TAG)

TAG CHAIR — TEDD WARD, DEL NORTE COUNTY
TAG VICE CHAIR — NARCISA UNTAL, SOLANO COUNTY
DEPUTY EXECUTIVE DIRECTOR — STACI HEATON

Rural Counties Environmental Services Joint Powers Authority Board of Directors & Technical Advisory Group Meeting

**1215 K St., Suite 1650
Sacramento, CA 95814**

Thursday, October 16, 2025 9:00 a.m. – 3 p.m.

**Additional Teleconference Locations are Listed on the
Last Page of this Agenda**

(All Teleconference Locations are Accessible to the Public)

This meeting will also be livestreamed for public access. Members of the public can watch or listen to the meeting using one of the following methods:

1. Join the Zoom meeting application on your computer, tablet or smartphone:

Go to: <https://rcrcnet.zoom.us/j/84780969403>

Enter Password: 294461

2. Call-in and listen to the meeting:

Dial (877) 853-5247

Enter meeting ID: 847 809 694 03

Passcode: 290461

PUBLIC COMMENT USING ZOOM: Members of the public who join the Zoom meeting, either through the Zoom app or by calling in, will be able to provide live public comment at specific points throughout the meeting.

EMAIL PUBLIC COMMENT: One may also email public comment to jlunn@rcrcnet.org before or during the meeting. All emailed public comments will be forwarded to all ESJPA Board of Directors members.

Only those items that indicate a specific time will be heard at the assigned time. All other items may be taken out of sequence to accommodate the Board, the staff, and the general public. Indicated time allocations are for planning purposes only and actual times will vary from those indicated.

I. Call to Order, Self-Introductions, and Determination of Quorum

- A. Overview of Meeting Procedures – Staci Heaton, ESJPA Deputy Executive Director.

Guest Speaker:

**Emily Coven, California Executive Director
Circular Action Alliance**

II. Business Matters

Discussion and possible action related to the following:

- A. Approval of Minutes from the Meeting of August 14, 2025 **(ACTION)** – Supervisor Lori Parlin, ESJPA Chair. *(pgs. 2-6; 5 minutes)*
- B. Development of 2026-28 ESJPA Business Plan – Staci Heaton and Christopher Egan, RCRC Management Analyst *(pgs. 7-9; 15 minutes)*
- C. Consideration and Approval of the 2026 ESJPA Board of Directors Meeting Calendar **(ACTION)** – Staci Heaton *(pgs. 10-11; 5 minutes)*

III. Public Comment

Any person may address the Board on any matter relevant to the Authority's business, but not otherwise on the agenda.

IV. Presentations

- A. Report from CalRecycle – Melissa Vargas, Local Assistance and Market Development Branch *(15 minutes)*

V. Member County Concerns/Comments

VI. Legislative Update *(Supplemental Packet, 15 minutes)*

(This item may be heard at any time during the meeting depending upon the availability of staff) Discussion of Legislation – John Kennedy, RCRC Senior Policy Advocate

- Bill update—Assembly Bill 28 (Schiavo), Assembly Bill 998 (Hadwick), Senate Bill 501 (Allen)
- Discussion of possible 2026 sponsored bills

VII. Extended Producer Responsibility (30 minutes)

- California Product Stewardship Council Update – Joanne Brasch, Director of Advocacy and Outreach, CPSC
- National Stewardship Action Council Update – Heidi Sanborn, Executive Director/CEO
- Mattress Recycling Council Update – Christine Messer, Northern California Program Director
- PaintCare Update – Eric Humphreys, California Regional Program Coordinator, PaintCare
- Carpet America Recovery Effort – Lisa Mekis, California Senior Associate

VIII. Solid Waste/Regulatory Update

Discussion and possible action related to the following:

- A. Federal Update – Staci Heaton (5 minutes)
- B. CalRecycle (20 minutes)
 - a. SB 54 Implementation – John Kennedy, and Larry Sweetser, Sweetser and Associates (pgs. 13-83)
 - b. SB 1383 Implementation – Larry Sweetser and Staci Heaton
 - c. Illegal Dumping – Larry Sweetser (pgs. 84-87)
 - d. Form 303 – Larry Sweetser
 - e. Dealer Co-op Stewardship Plan – Larry Sweetser (pgs. 88-92)
- B. California Air Resources Board
 - a. Landfill Methane Outreach Update – Larry Sweetser (pgs. 93-105; 10 minutes)
- C. Department of Toxics Substances Control (10 minutes)
 - a. Hazardous Waste Management Plan (pgs. 106)
 - b. Safer Consumer Products
 - c. Program Updates – Larry Sweetser
- D. Grant Program and Contracts Update (10 minutes)
 - a. CalRecycle Rural Zero Waste Plan – Larry Sweetser and Jason Hansen, RCRC Economic Development Officer
 - b. ESJPA Ongoing and Potential Grants – Larry Sweetser
- E. Highlights of August-October 2025 CalRecycle Monthly Meetings – Larry Sweetser (pgs. 107-153; 5 minutes)
- F. Other Regulatory Announcements/Issues of Interest
 - Cal EPA CUPA Newsletters (pgs. 154-174)
- G. Agenda Suggestions, Member County Presentation Volunteer, Workshop Topics for Next ESJPA Board Meeting Scheduled December 11, 2025

IX. Articles of Interest

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X. Adjournment

Lunch Break

Technical Advisory Group Breakout Session 1 p.m.

CalRecycle Rural Zero Waste Plan Development

Meeting facilities are accessible to persons with disabilities. By request, alternative agenda document formats are available to persons with disabilities. To arrange an alternative agenda document format or to arrange aid or services to modify or accommodate persons with a disability to participate in a public meeting, please call (916) 447-4806 at least 48 hours before the meeting.

Agenda items will be taken as close as possible to the schedule indicated. Any member of the general public may comment on agenda items during the public comment period. To facilitate public comment, please let staff know if you would like to speak on an agenda item. The agenda for this meeting of the Board of Directors of Rural Counties Environmental Services Joint Powers Authority was duly posted at its offices, 1215 K Street, Suite 1650, Sacramento, California, at least 72 hours prior to the meeting.

Any written materials related to an open session item on this agenda that are submitted less than 24 hours prior to the meeting, and that are not exempt from disclosure under the Public Records Act, will promptly be made available for public inspection at ESJPA's principal office, 1215 K Street, Suite 1650, Sacramento, CA 95814, (916) 447-4806, during normal business hours, and on the ESJPA website, <https://www.esjpa.org>.

Additional Teleconference Location(s)

Del Norte Solid Waste Management Authority Conference Room 1700 State Street Crescent City, CA 95531	Imperial County Department of Public Works 155 S. 11th Street El Centro, CA 92243
Mono County Civic Center Convict Lake Room 1290 Tavern Road Mammoth Lakes, CA 93546	Trinity County Solid Waste Office Conference Room 173 Tom Bell Rd Weaverville CA 96093

Agenda Item II

BUSINESS MATTERS



TECHNICAL ADVISORY GROUP (TAG)

**Rural Counties Environmental Services Joint Powers Authority
Board of Directors & Technical Advisory Meeting Minutes**

**1215 K St., Suite 1650
Sacramento, CA 95814**

Thursday, August 14, 2025

VOTING MEMBERS PRESENT

Jeff Gardner
Craig Cissell
Tedd Ward
Supervisor Lori Parlin
Supervisor Rhonda Duggan
Brad Torres
Charleen Beard
Narcisa Untal
Paul Freund
Diane Rader
Supervisor Mike Holland

Amador County
Butte County
Del Norte County
El Dorado County
Mono County
Nevada County
Shasta County
Solano County
Tehama County
Trinity County
Tuolumne County

STAFF IN ATTENDANCE

Staci Heaton, Deputy Executive Director
Larry Sweetser, ESJPA Consultant
Christopher Egan, Management Analyst
John Kennedy, Senior Policy Advocate
Julie Lunn, Office Coordinator

Rural Counties ESJPA
Sweetser and Associates, Inc.
RCRC
RCRC
RCRC

GUEST SPEAKERS

Melissa Vargas, CalRecycle
Eric Payne, CalRecycle
Joanne Brasch, California Product Stewardship Council
Christine Messer, Mattress Recycling Council
Eric Humphreys, PaintCare

I. Call to Order, Self-Introductions, and Determination of Quorum

Supervisor Lori Parlin, ESJPA Chair, called the meeting to order at 9:05 a.m. A quorum was determined at that time, and Staci Heaton, ESJPA Deputy Executive

Director, gave an overview of meeting procedures in accordance with the Brown Act.

II. Business Matters

- A. The Board considered minutes from the June 12, 2025 meeting for approval.

Motion/Second to approve the minutes by Mono County/El Dorado County. Motion approved unanimously.

- B. Development of 2026-28 ESJPA Business Plan

Staci Heaton and Christopher Egan, RCRC Management Analyst, conducted a SWOT analysis with the Board to help inform the development of the 2026-28 ESJPA Business Plan. The Board of Directors asked staff to digest the comments and defer “next steps” to the October meeting, where a draft of the Plan could be reviewed.

III. Public Comment

No public comment was noted.

IV. Presentations

- A. Monetizing Carbon Farming With Carbon Credits

Evan Edgar, Edgar & Associates, Inc., presented on how to undertake carbon credits projects via “carbon farming.” Mr. Freund noted that it can be hard to get ranchers/farmers to buy in on the benefits of carbon farming. Since they don’t see immediate impact, it’s hard to sell them on the programs. Mr. Cissell asked what the longevity of a project is before they have to reapply for grant funding. He noted that some farmers also have vernal pools, other characteristics that keep them from applying.

- B. Report from CalRecycle – Melissa Vargas, Local Assistance and Market Development Branch

Ms. Vargas gave an update on various CalRecycle items, including an upcoming SB 1383 that will feature San Benito County. She also noted a number of upcoming grant deadlines and SB 54 deadlines. Mr. Garcia noted that Nevada County is still waiting on results from their SB 1383 compliance evaluation. Mr. Sweetser noted that many other counties are also still waiting. Ms. Vargas acknowledged the delays.

V. Member County Concerns/Comments

None noted.

VI. Legislative Update

John Kennedy, RCRC Senior Legislative Advocate, discussed several measures RCRC and ESJPA are working on. He noted that the HHW bill is proving

challenging due to DTSC's interference. Also discussed RCRC's sponsored bill on single-use vapes, which is now a 2-year bill. Mr. Kennedy expects a lot of movement on the bill next year, despite opposition from vape manufacturers and retailers. Mr. Kennedy also asked members to consider ideas for sponsored legislation in 2026.

VII. Extended Producer Responsibility

- California Product Stewardship Council Update
Joanne Brasch, Director of Advocacy and Outreach, gave an update on the status of various CPSC bills.
- National Stewardship Action Council
Heidi Sanborn, NSAC Executive Director, discussed a number of bills that NSAC is sponsoring and supporting. She also discussed SB 54 implementation.
- PaintCare Update
Eric Humphreys, California Regional Program Coordinator, noted that PaintCare is working on collection of aerosol cans. He also noted a number of staffing shifts and changes, and that he would send a list of which representative works with which counties.

VIII. Solid Waste/Regulatory Update

Discussion and possible action related to the following:

A. CalRecycle

a. SB 54 Implementation

Mr. Kennedy and Mr. Sweetser noted that the new regulations open up loopholes that could create costs. RCRC is prepared to explore the mandates reimbursement process if that's the case. Mr. Sweetser noted that the Circular Action Alliance is trying to develop program but not sure if rural facilities are included. CAA is having webinars starting 9/2 to discuss the regs from their perspective.

b. SB 1383 Implementation

Mr. Sweetser noted that CalRecycle finally cleared the hurdle on Nevada County's compliance review, and have released info for a number of counties. Mr. Garcia noted that they have received a draft report after 2 ½ years, which is positive and pretty uneventful.

c. Illegal Dumping

Mr. Sweetser noted that IDTAC is still having meetings, focusing on how to build cooperatives.

d. PaintCare

Mr. Sweetser discussed the PaintCare regulations, which propose ways to expand the program. RCRC provided comments. Space constraints in a lot of our counties.

e. Battery regulations

Mr. Sweetser noted that embedded battery regulations should be more formalized soon.

f. Form 303

Mr. Sweetser reminded members that the Form 303 is due October 1 and recommended to reach out to collectors to provide data.

g. Electronic Annual Reports

Mr. Sweetser reminded members that the EAR was due on August 1st.

h. Dealer Co-op Stewardship Plan

Mr. Sweetser noted that the plan was approved by CalRecycle to provide more opportunities to join, and that few rural counties are on the list. Mr. Kennedy noted that RCRC pushed back on some of the provisions of the regs, particularly the concept that not every facility has to take all material types and jurisdictions would have to find homes for those materials.

B. California Air Resources Board

a. Advanced Clean Fleets

Ms. Heaton gave an update on the ACF regulations, including discussion of implementation timelines and exemptions.

b. Landfill Toxic Hot Spots Update

Mr. Sweetser mentioned that ESJPA has been part of a workgroup exploring whether to require testing on landfill emissions for more than just methane. There is the ability to do a pool to share costs, and we are exploring a pool for our counties.

c. Landfill Methane Outreach Update

Mr. Sweetser noted that there would be a CARB meeting on the following Monday to discuss what the regs will look like.

C. Department of Toxics Substances Control

a. Hazardous Waste Management Plan

Mr. Sweetser explained that DTSC has finished their listening sessions and is taking feedback on potential changes. He noted that there are a lot of inspections happening on HHW programs looking for labeling and record-keeping.

D. State Water Resources Control Board Waste Discharge Fees

Mr. Sweetser noted that the Water Board is doing its annual fee review, proposing a 2.4% increase on landfills.

E. Grant Program and Contracts Update

a. CalRecycle Rural Zero Waste Plan
Will talk about in TAG.

b. OPP Grant Annual Report

Mr. Sweetser noted that the grant was due on the same day as the meeting.

c. ESJPA Ongoing and Potential Grants

Mr. Sweetser noted that ESJPA is implementing the Tire Amnesty program, doing events in Sierra and Mariposa. We are pulling a lot of tires from Sierra.

F. Highlights of June-July 2025 CalRecycle Monthly Meetings

Mr. Sweetser discussed implementation issues on the pharms and sharps program, and how it is difficult for producers to comply with EPR program.

G. Agenda Suggestions, Member County Presentation Volunteer, Workshop Topics for Next ESJPA Board Meeting Scheduled October 2025

None noted.

IX. Articles of Interest

X. Adjournment

The meeting was adjourned at 12:17 p.m.

Technical Advisory Group Breakout Session 1 p.m.

Rural Zero Waste Plan - implementation, obstacles, and resources for edible food recovery, CalGreen, paper procurement, and more.

Mr. Sweetser discussed several issues with the members as they pertain to Zero Waste, including how small counties are dealing with SB 1383 requirements.



MEMORANDUM

To: ESJPA Board of Directors

From: Staci Heaton, Deputy Executive Director

Date: October 16, 2025

RE: Development of 2026-28 ESJPA Business Plan

In 2022, the ESJPA Board of Directors approved a 2023-25 ESJPA Business Plan. ESJPA established targets and metrics for success of the Business Plan, which was approved by the Board by the December 2022 ESJPA Board of Directors meeting. ESJPA established targets and metrics for success of the Business Plan, which has been implemented over the last three years.

As the Business Plan is set to expire, ESJPA is continuing a process to develop the 2026-28 ESJPA Business Plan. The first step, a SWOT (Strengths, Weaknesses, Opportunities, and Threats) analysis to gather feedback from the members of the Board, was conducted at the August 2025 meeting. Members asked ESJPA to present a first draft of the Business plan at the October 2025 meeting, which is attached. ESJPA is targeting a final draft presentation to the Board at the December 2025 meeting.

Recommendation

It is recommended that the ESJPA Board review the draft 2026-2028 ESJPA Business Plan and provide feedback and recommendations to ESJPA to inform the final 2026-28 update.

Attachments

- Draft 2026-2028 ESJPA Business Plan

ESJPA 2026-2028 Business Plan



Rural Counties
Environmental Services
Joint Powers Authority

ESJPA

Goal: Organizational Health

Objective: Enhance the organization's financial stability and workforce capacity.

- *Strategy:* Expand staff capacity to support ESJPA programs and projects.

Metrics:

- *Completion of financial forecast (Yes/No)*

Goal: Engaged Membership

Objective: Increase member engagement and enhance services.

- *Strategy:* Launch pilot programs in select member counties.
- *Strategy:* Facilitate broader discussions with board members on key materials and initiatives.
- *Strategy:* Provide timely updates and guidance to members on state and federal political developments.
- *Strategy:* Expand training opportunities to address members' needs.
- *Strategy:* Promote remote participation option to increase board meeting attendance.

Metrics:

- *Number of trainings conducted.*
- *Percentage of member counties represented in attendance at Board Meetings*

Goal: Increased Visibility

Objective: Increase visibility and awareness of ESJPA operations and programs.

- *Strategy:* Conduct presentations to County Boards on ESJPA programs and services.
- *Strategy:* Present ESJPA updates at RCRC Board meetings.
- *Strategy:* Develop and distribute a newsletter to highlight ESJPA initiatives.
- *Strategy:* Facilitate visits to member county facilities for ESJPA staff and stakeholders.
- *Strategy:* Promote and market ESJPA's affiliate entity program.

Metrics:

- *Number of county board presentations conducted.*
- *Newsletter created and distributed. (Yes/No)*
- *Number of member county facilities visited.*

Goal: Impactful Advocacy

Objective: Advance the interests of ESJPA members at the state and federal level.

- *Strategy:* Develop targeted advocacy campaigns related to new waste streams and/or funding initiatives.
- *Strategy:* Explore test claims cases for unfunded mandates on solid waste management topics.
- *Strategy:* Increase member engagement with the legislature.
Strategy: Organize educational tours of member county facilities with legislators and CalRecycle to raise awareness of ESJPA operations.
- *Strategy:* Identify opportunities to provide input to legislators on disaster response planning and policy.

Metrics:

- *Number of educational tours conducted.*
- *Number of Bills:*
 - *Monitored by ESJPA*
 - *Supported by ESJPA; and*
 - *Sponsored by ESJPA*



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DEPUTY EXECUTIVE DIRECTOR — STACI HEATON

MEMORANDUM

To: ESJPA Board of Directors

From: Staci Heaton, Deputy Executive Director

Date: October 16, 2025

RE: Proposed 2026 ESJPA Meeting Calendar - ACTION ITEM

The proposed 2026 ESJPA meeting calendar is attached for your consideration and adoption. Consistent with past years, the proposed meeting schedule includes five meeting dates commencing in March 2026.

We attempt to coordinate the ESJPA meeting being held the day after the RCRC Board or Executive Committee meetings to the greatest extent possible to minimize the number of vehicle miles travelled by the ESJPA Chair and any other Supervisors that would like to attend our meetings in person. In doing so, this year the meeting schedule coincides with three RCRC Board meeting dates in March, August and December and the RCRC Executive Committee in October. We are proposing one ESJPA meeting that does not directly follow an RCRC Board meeting, in June.

ESJPA will begin its meetings at 9:00 a.m. and end by 3:00 p.m. Should a change to the meeting time occur, notifications will be sent out prior to the meeting date.

Recommendation

Consistent with the requirements of Section 8 of the Joint Exercise of Powers Agreement, amended and restated December 16, 2004, it is recommended that the ESJPA Board adopt the 2026 ESJPA meeting calendar as attached.

Attachment

- 2026 ESJPA Meeting Calendar



ESJPA BOARD OF DIRECTORS 2026 MEETING CALENDAR

Thursday, March 26 th	RCRC Conference Room
Thursday, June 11 th	RCRC Conference Room
Thursday, August 20 th	RCRC Conference Room
Thursday, October 22 nd	RCRC Conference Room
Thursday, December 10 th	RCRC Conference Room

**** Note:** Board of Directors meetings are anticipated to be held from 9:00 a.m. to noon, with a Technical Advisory Group session to follow.

Agenda Item VIII

SOLID WASTE/ REGULATORY UPDATES

NOTICE OF PROPOSED ACTION

**SB 54 PLASTIC POLLUTION PREVENTION AND PACKAGING
PRODUCER RESPONSIBILITY ACT PERMANENT REGULATIONS
DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY
TITLE 14. NATURAL RESOURCES
DIVISION 7
CHAPTERS 11.1 AND 11.5.**

NOTICE IS HEREBY GIVEN that the Department of Resources Recycling and Recovery (CalRecycle) proposes to add to the California Code of Regulations, Title 14, Division 7, Chapter 11.1 (commencing with section 18980.1) and Chapter 11.5 (commencing with section 18981). The proposed regulations interpret, make specific, and implement the requirements of Senate Bill No. 54 (2021-2022 Reg. Sess.), the Plastic Pollution Prevention and Packaging Producer Responsibility Act (Stats. 2022, ch.75) (the Act), and establish various elements of CalRecycle's oversight and enforcement responsibilities under the Act. The proposed regulations will also establish the criteria and procedures necessary to implement the requirement established by Assembly Bill No. 1201 (2021-2022 Reg. Sess.) (Stats. 2021, ch.504) (AB 1201) that products labeled "compostable" must be certified by third-party entities according to certain technical standards.

After considering all comments, objections, and recommendations regarding the proposed action, CalRecycle may adopt the proposals substantially as described in the below Informative Digest or may modify such proposals if such modifications are sufficiently related to the original text.

PUBLIC HEARING

CalRecycle will hold a hybrid public hearing starting at 10:00 AM (PDT) on October 7, 2025 and concluding upon submission of any public hearing comments. The public hearing will be accessible in person in the Byron Sher Auditorium located on the 2nd floor of the CalRecycle headquarters at 1001 I Street, Sacramento, California. The Byron Sher Auditorium room is wheelchair accessible. The public hearing will also be accessible virtually via Zoom for direct participation and via Webcast for observation only. Instructions for how to access the Zoom public hearing (registration required) or Webcast (no registration required), can be found on CalRecycle's website at <https://calrecycle.ca.gov/Laws/Rulemaking/>.

Please note that Webcast participants will not be able to provide comments during the public hearing. To participate remotely and provide comments, it is recommended to join via Zoom, or to email any comments to regulations@calrecycle.ca.gov. No registration is necessary to view the Webcast.

At the public hearing, any person may present statements or arguments, orally or in writing, relevant to the proposed action. CalRecycle requests, but does not require, that any person who makes oral comments also submit a written copy of their testimony at the hearing. All comments at the public hearing will be collected and recorded.

INTERPRETATION SERVICES

Interpretación simultánea del inglés al español será disponible para todos los participantes al taller, sea en persona, o remotamente a través de Zoom, o por transmisión en vivo en línea. Para los participantes en persona que requieren servicios de interpretación del inglés al español, habrá audífonos disponibles que serán proporcionados por el personal de CalRecycle antes o durante el taller.

If interpretation services are needed in a language other than Spanish, contact CalRecycle at regulations@calrecycle.ca.gov by September 26, 2025, and CalRecycle staff will do their best to accommodate this request.

WRITTEN COMMENT PERIOD

The written comment period permits any interested person, or their authorized representative, to submit written comments addressing the proposed amendments to CalRecycle. Written comments, which offer a recommendation and/or objection, or support the proposed amendments, should indicate the amended section to which the comment or comments are directed. CalRecycle will only consider written comments sent to CalRecycle and received during the written comment period, which begins on August 22, 2025, and ends on October 7, 2025. Written comments received by CalRecycle after the close of the public comment period are considered untimely. CalRecycle may, but is not required to, respond to untimely comments, including those raising significant environmental issues. Comments submitted in writing must be addressed to one of the following:

Postal mail:

Csilla Richmond
SB 54 Plastic Pollution Prevention and Packaging Producer Responsibility Act
Permanent Regulations
Department of Resources Recycling and Recovery, Regulations Unit
1001 "I" St., MS-24B, Sacramento, CA 95814

Electronic submittal: [SB 54 Plastic Pollution Prevention & Packaging Producer Responsibility Act Regulations \(45-Day Comment Period\)](#)

Please note that under the California Public Records Act (Government Code section 7920.000 et seq.), your written and oral comments, attachments, and associated

contact information (e.g., your address, phone number, email address, etc.) become part of the public record and can be released to the public upon request.

AUTHORITY AND REFERENCES

Public Resources Code Sections 40401, 40502, 42041, 42052, 42053, 42057, 42060, 42061, 42061.5, 42063, 42064, 42080, 42081, and Government Code Sections 11415.10 and 11440.20 provide authority for this regulation. The purpose of the proposed actions is to implement, interpret, and make specific, and implement the requirements of Senate Bill No. 54 (2021-2022 Reg. Sess.), the Plastic Pollution Prevention and Packaging Producer Responsibility Act (Stats. 2022, ch.75), (the Act).

The following is a list of references cited in this proposed regulation: Public Resources Code Sections 40062, 40120.1, 40121, 40192, 41780.01, 42040, 42041, 42050, 42051, 42051.1, 42051.2, 42051.3, 42052, 42053, 42054, 42056, 42057, 42060, 42060.5, 42061, 42061.5, 42062, 42063, 42064, 42067, 42070, 42080, 42081, 42083, 42281.2, 42281.5, 42355, 42355.51, 42356, 42356.1, 42356.2, 42357, 42357.5, 42358, 42358.5, and 42649.8, Government Code Sections 7921.500, 7922.530, 11445.10, 11440.20, 11445.30, 11445.40, 11445.50, 11445.60, 11505, 11506, Health and Safety Code Section 25249.

INFORMATIVE DIGEST

Summary of Existing Laws

The California Integrated Waste Management Act of 1989 (Pub. Resources Code, section 40000 et seq.), administered by CalRecycle, regulates the disposal, management, and recycling of, among other solid waste, packaging and single-use food ware. It also imposes various reporting requirements on disposal facility operators, solid waste handlers, and transfer station operators regarding the types and quantities of materials disposed of, sold, or transferred to other entities.

Pursuant to Assembly Bill No. 341 (2011-2012 Reg. Sess.) (Stats. 2011, ch. 476), the state's policy goal was that at least 75 percent of solid waste generated would be source-reduced, recycled, or composted by 2020. That goal has not yet been met.

Senate Bill No. 1335 (2017-2018 Reg. Sess.), the Sustainable Packaging for the State of California Act of 2018 (Stats. 2018, ch. 510) (SB 1335), applies to food service packaging used by food service facilities located in a state-owned facility, operating on, or acting as a concessionaire on state property, or under contract to provide food service to a state agency. CalRecycle publishes a list of food service packaging items that, for purposes of SB 1335, it deems reusable, recyclable, or compostable, and facilities subject to the law are prohibited from using food service packaging items not identified on that list.

Senate Bill No. 343 (2021-2022 Reg.Sess.) (Stats. 2021, ch. 507) (SB 343), establishes specific standards for what constitutes deceptive labeling concerning recyclability.

Products can only be labeled “recyclable” or with the “chasing arrows” logo if they are regularly collected and processed for recycling and meet certain design and composition characteristics affecting recyclability, or if they satisfy other criteria related to recycling rates, alternative collection programs, or government programs governing recyclability. CalRecycle must conduct periodic material characterization studies examining the material types and forms that are collected, sorted, sold, or transferred by solid waste facilities in the state. Determinations of whether items can be considered recyclable in California must be based on the information that CalRecycle publishes.

Assembly Bill No. 1201 (2021-2022 Reg. Sess.) (Stats. 2021, ch. 504) (AB 1201) establishes requirements that products labeled “compostable” must meet. The requirements concern certification that material meets certain technical standards related to biodegradation and disintegration, whether material is an allowable organic input pursuant to the United States Department of Agriculture National Organic Program, presence of perfluoroalkyl or polyfluoroalkyl substances, clarity and conspicuousness of the labeling, and association with the recovery of desirable organic wastes.

Effect of the Proposed Action

By interpreting, making specific, and implementing the Act, the proposed regulations will establish the various substantive and procedural requirements applicable to the extended producer responsibility (EPR) program that the Act requires producers of single-use packaging and single-use plastic food service ware (covered materials) to administer. The proposed regulations will also establish how CalRecycle will exercise its oversight and enforcement responsibilities.

The proposed regulations will also implement the AB 1201 requirement that products must be certified by third parties to meet a technical standard established under chapter 5.7 of part 3 of division 30 of the Public Resources Code (commencing with section 42355). By implementing this requirement of AB 1201, the proposed regulations will cause the requirement to take effect generally, not just with respect to covered materials.

Policy Statement Overview and Anticipated Benefits of the Proposed Regulations

The broad objective of the proposed regulations is to implement the Act, ensuring that it achieves its goals: source reduction of plastic covered material, elimination of covered material that is not recyclable or compostable, and significant improvements in recycling rates for covered material. The proposed regulations also serve the objective of improving the integrity of product labeling by implementing a certification requirement for when any product (including those using covered materials) can lawfully be labeled “compostable.”

These objectives are consistent with the more general policy goals of shifting California to a circular economy and shifting responsibility for end-of-life management of various materials onto the producers of them, thereby lessening the materials’ effects on the

environment and public health and easing the burdens on local jurisdictions and consumers. Shifting responsibility through EPR statutes like the Act will benefit solid waste handling in the state by requiring producers to address the costs of such management and incentivizing the development of infrastructure, technological innovation, and increased usage of reusable and refillable products.

By giving effect to the certification requirement of AB 1201, the proposed regulations will reduce deception of consumers regarding whether products are compostable. Consumers will be able to make more informed purchasing choices and better understand what materials are appropriate to discard with materials collected for composting. In turn, this will enhance the technical and economic viability of composting programs statewide.

By implementing the Act, the proposed regulations will also spur improvements in recycling and composting infrastructure, which will lead to decreased pollution and environmental harm associated with disposal of covered materials. These effects will, in turn, have positive effects on human health. Decreased disposal of covered material will also decrease greenhouse gas emissions associated with such disposal.

Specific anticipated benefits of the proposed regulations' implementation and enforcement of the Act include:

- Reduction of plastic pollution and litter
- Reduction of greenhouse gas emissions
- Decreased material disposal burdens
- Decreased raw material extraction and virgin material usage
- Greater use of reusable and refillable items and expansion of reuse and refill systems
- Reduced presence of toxins and other chemicals that would render products non-compostable or interfere with recycling
- Increased access to recycling and composting
- Investments in communities disproportionately impacted by the effects of plastic pollution
- Supporting a stable circular economy
- Supporting consistent recycling systems state-wide
- Increased revenue for businesses from the sale of recycled material product
- Decreased public health concerns such as cancer, asthma, and birth defects
- Encouragement of packaging innovation
- Reduced exposure to chemicals and microplastics from shifts to plastic alternatives
- Ensuring that refillable or reusable materials can be used safely and hygienically
- Promoting openness and transparency in business and government through creation and implementation of Producer Responsibility Organization (PRO) plans and plans created by individual businesses
- Reduced deception of consumers and increased transparency in business by imposing certification requirements for labeling products as "compostable."

Consistency With State Regulations

Pursuant to Government Code Section 11346.5(a)(3)(D), CalRecycle conducted an evaluation of existing state regulations. CalRecycle determined that the proposed regulations are neither inconsistent nor incompatible with existing state regulations and that CalRecycle is the only agency that can implement this proposed regulation.

INCORPORATION BY REFERENCE

The following documents are incorporated by reference in the proposed regulation:

- ISO/IEC 17025:2017(E), “General requirements for the competence of testing and calibration laboratories,” International Organization for Standardization/ International Electrotechnical Commission, November 2017
- ISO/IEC 17065:2012(E), “Conformity assessment—Requirements for bodies certifying products, processes and services,” International Organization for standardization/International Electrotechnical Commission, September 2012.
- State Administrative Manual, section 9213.1, Allocation of Costs—Indirect Cost Rate Determination Methodology, California Department of General Services (as published on 01/2022).
- ISO 59014: 2024(en), “Environmental management and circular economy — Sustainability and traceability of the recovery of secondary materials — Principles, requirements and guidance,” International Organization for Standardization, October 2024.

EXISTING COMPARABLE FEDERAL REGULATION OR STATUTE

CalRecycle has determined that the proposed regulations do not significantly differ from federal law because there are no existing comparable federal statutes or regulations in this subject area.

OTHER STATUTORY REQUIREMENTS (GOVERNMENT CODE SECTION 11346.5(a)(4))

CalRecycle has determined that no other matters, as prescribed by statute, need to be addressed.

MANDATES ON LOCAL AGENCIES OR SCHOOL DISTRICTS

CalRecycle has made the following initial determinations:

Mandate Imposed on Local Agencies: Yes

Costs to any local agency which requires reimbursement in accordance with Part 7 of Division 4 of Title 2 of the Government Code: None

The statute mandates that local jurisdictions and recycling service providers (local agencies) include certain materials in their collection and recycling programs. Fulfilling that mandate involves collaboration with the producer responsibility organization (PRO) and certain producers to undertake various activities, such as education and outreach, material collection and processing, infrastructure improvement, and related investments. Local agencies' costs for fulfilling their mandate are influenced by local circumstances, including population density and market proximity. While certain costs may be initially borne by local agencies, they are not reimbursable by the State because, under the Act and the proposed regulations, the PRO and certain producers must pay local agencies to cover the expenses they incur to meet their statutory obligations.

Mandate Imposed on School Districts: None

FISCAL IMPACT

Costs to Any Local Agencies or School Districts Requiring Reimbursement

CalRecycle has determined that the proposed regulations do not result in costs to any local agency or school district that must be reimbursed by the State pursuant to Section 6 of Article XIII B of the California Constitution and Part 7 of Division 4 of Title 2 of the Government Code (Section 17500 et seq.).

Cost or Savings to Any State Agency

CalRecycle has determined that adoption of these proposed regulations does have a cost to state agencies.

The total annual cost to the state is estimated to total \$76.75 million which will be incurred by CalRecycle and funded by the PRO through the Circular Economy Fund. CalRecycle also anticipates a \$2 million reduction in revenue to the state from a decrease in disposal stream tipping fees.

Non-Discretionary Cost or Savings Imposed Upon Local Agencies

CalRecycle has determined that there are non-discretionary costs or savings imposed on local agencies. These costs are not required to be reimbursed by the State. Rather, the PRO and certain producers are responsible for fully paying local agencies to cover the expenses they incur to meet their statutory obligation. CalRecycle expects local agencies to improve and expand their recycling collection services in complying with the proposed regulations and estimates that the average cost per Fiscal Year for these activities is anticipated to be \$18.1 million through 2024-25, 2025-26, and 2026-2027. Local agencies will collaborate with the PRO and certain producers to undertake activities that may involve additional non-discretionary costs depending on local circumstances, including education and outreach, material processing, and additional

infrastructure improvements. Local agencies will be paid by the PRO or certain producers for any such non-discretionary costs.

Cost or Savings in Federal Funding to the State

CalRecycle has determined that adoption of these regulations will not have an impact on costs or savings in federal funding to the State.

HOUSING COSTS

CalRecycle has determined that adoption of these regulations will have no significant effect on housing cost.

SIGNIFICANT STATEWIDE ADVERSE ECONOMIC IMPACT DIRECTLY AFFECTING BUSINESS

CalRecycle has made an initial determination that the adoption of this regulation may have a significant, statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states.

CalRecycle has considered proposed alternatives that would lessen any adverse economic impact on business and invites the public to submit proposals. Submissions may include the following considerations:

- (i) The establishment of differing compliance or reporting requirements or timetables that take into account the resources available to businesses.
- (ii) Consolidation or simplification of compliance and reporting requirements for businesses.
- (iii) The use of performance standards rather than prescriptive standards.
- (iv) Exemption or partial exemption from the regulatory requirements for businesses.

The businesses most directly affected by these proposed regulations are referred to in the Act as “producers” of single-use packaging and plastic single-use food service ware. Entities may be producers based on their ownership or licenses to use brands or trademarks or because they sell, offer for sale, or distribute such materials in the state.

As of 2032, the Act will require that all single-use packaging and plastic single-use food service ware be recyclable or compostable. It also requires that plastic single-use packaging and plastic single-use food service ware achieve source reduction targets and certain recycling rates.

These proposed regulations will require producers to maintain records and report data to CalRecycle that demonstrate their compliance with the Act’s requirements. Producers

will also be required to reduce, collectively, the overall amount of the regulated materials that are sold into the state.

The Act requires producers to participate in a program operated by a PRO pursuant to a plan approved by CalRecycle. Alternatively, producers that meet certain requirements can create and implement their own plan. Producers, either through the PRO or individually, will be required to prepare and submit plans addressing all requirements stated in the Act, submit annual budgets and reports concerning their plans, and maintain records documenting their compliance with the Act. The reporting and recordkeeping requirements encompass the following: the amount and types of single-use packaging and plastic single-use food service ware that producers sell, distribute, or import; the amount and types of such materials that producers collect for recycling; the basis asserted for certain materials to be considered recyclable; estimations of recycling rates for particular types of materials; calculations of source reduction with respect to plastic single-use packaging and food service ware; and records demonstrating that entities that collect and process materials subject to the Act do so in a manner that satisfies certain criteria.

These proposed regulations will also impose compliance requirements on businesses that assert they are not “producers” of covered material because some other entity is the producer or because the packaging or plastic food service ware is excluded from being considered “covered material.” Such businesses may be required to support their claim that they are not a producer, such as by demonstrating that such items satisfy specific criteria in the Act or proposed regulations.

Solid waste enterprises that provide solid waste handling services on behalf of a local jurisdiction will also be affected because the Act may require them to add certain types of materials to their collection and recycling programs.

RESULTS OF STANDARDIZED REGULATORY IMPACT ASSESSMENT

Creation or Elimination of Jobs within the State of California

CalRecycle has determined that the proposed action will not eliminate jobs within California. Over the course of implementation, it is projected that 219,950 jobs may be created in the manufacturing industries specializing in recyclable plastics, paper, glass, and metal products, as well as within the construction, wholesale, retail, and food service industries.

Creation of New Businesses or Elimination of Existing Businesses within California

CalRecycle has determined that the proposed action will create new businesses within California. It is anticipated that at least 15 businesses will be created statewide. These

businesses include at least one PRO (a non-profit organization), and several material recovery facilities (MRFs).

CalRecycle has determined that the proposed action will not eliminate existing businesses within California.

Competitive Advantages or Disadvantages for Businesses Currently Doing Business within the State

CalRecycle has determined that the proposed action will not have Competitive Advantages or Disadvantages for Businesses Currently Doing Business within California.

Increase or Decrease of Investment in the State

CalRecycle has determined that the proposed action will increase investment in California. Private investment will experience an initial increase of \$49 million in 2024 and peak in 2030 at \$952 million. There is no indication that there will be a net decrease in investment in the state because of the proposed regulations.

Incentives for Innovation in Products, Materials or Processes

CalRecycle has determined that the proposed action will provide incentives for innovation in products, materials, and manufacturing and waste management processes that ensure cost-effective approaches for producers to be in compliance with the Act. The proposed regulations establish material packaging standards that will incentivize manufacturers to develop innovative and new packaging with covered material, increase the utilization of reuse and refill infrastructure, and develop new processes for recycling in order to meet the requirements of the Act.

Benefits of the Regulation, Including But Not Limited To, Benefits to the Health, Safety, and Welfare of California Residents, Worker Safety, the State's Environment, and Quality of Life

CalRecycle has determined that the proposed action will have benefits, including but not limited to, benefits to health and welfare of California residents, the state's environment, and quality of life. In addition to generating less packaging waste through plastic source reduction and shifting to reusable and refillable material, reducing plastic pollution through the funds from the California Plastic Pollution Mitigation Fund will lead to a decrease in negative human health and environmental impacts especially in disadvantaged and low-income communities disproportionately affected by plastic pollution. Additionally, California residents will also benefit from greater accessibility to recycling and composting due to the increase in infrastructure for collection, sortation, and processing of such materials. Creating recyclable and compostable packaging will lead to harmonization with our recycling infrastructure that will lead to less disposal and

prolong our landfill capacity and use. It will also lead to a decrease in greenhouse gas (GHG) emissions, and a decrease of fossil fuels used in the production of virgin plastic. Because this regulation doesn't directly impact workers, CalRecycle does not anticipate any direct benefits to worker safety as a result of this regulation.

Summary of the Department of Finance's Comments on the Proposed Regulations and the Standardized Regulatory Impact Assessment

The Department received the following comments from the Department of Finance on the draft Standardized Regulatory Impact Assessment (SRIA). The Department's responses are stated below and do not materially alter the estimations reported in the SRIA.

DOF Comment #1:

First, the 42.1-percent downward revision to the total cost, from \$36.3 billion in the original SRIA to \$21 billion in this revised SRIA, is driven almost entirely by a lower estimate of annual plastic waste generated in California, decreasing from 5.5 million tons in the 2021 estimate to 2.9 million tons in 2023. Estimating plastic waste is difficult and subject to uncertainty and the SRIA must provide a detailed explanation for the significant difference between the two estimates as well as a justification for why the revised estimate is more appropriate.

CalRecycle Response:

Due to the lack of available data on plastic covered material generation in California at the time CalRecycle wrote the SRIA for the initial rulemaking in 2024, for that analysis CalRecycle estimated the amount of plastic covered material by adding together the amounts of plastic covered material disposed of and recycled. To estimate the amount of disposed plastic covered material, CalRecycle utilized the most recent waste characterization study, containing data from 2021 disposal surveys. To estimate the amount of recycled plastic covered material, CalRecycle utilized data in the Recycling and Disposal Reporting System (RDRS), which contains self-reported data from entities that recycle material. In both sources, material categories are broad and do not include information specific to the amounts of covered material present. This means that those source data included large quantities of materials that are not covered material. For example, the waste characterization study includes an estimate for "Other Film Bags and Plastic Mailing Pouches." This category may include both plastic bags that qualify as packaging under the Plastic Pollution Prevention and Packaging Producer Responsibility Act (the Act) and plastic bags purchased as consumer goods for home use, such as storing items, which would not qualify as packaging or food service ware. From these sources, CalRecycle estimated that approximately 5.5 million tons of plastic covered material was generated in California every year. However, due to the lack of specificity in the available data, this estimate included materials that would not be covered materials under the Act. Since the time of the first SRIA analysis, CalRecycle has worked on developing more specific data on covered material generation as

required by the Act.

Per Public Resources Code (PRC) section 42057(b), CalRecycle was required to establish a baseline for the 25 percent source reduction goal for plastic by January 1, 2025. This study was underway while CalRecycle was developing the first SRIA but it had not yet produced usable data. Since that time, updated data on plastic covered material generation became available when CalRecycle published its study in the Source Reduction Baseline (SRB) report at the end of 2024. This report estimated that nearly 2.9 million tons of plastic covered material were generated in California in 2023. The data in this report are specific to covered material and do not include non-covered materials, unlike the waste characterization study and RDRS data. As the data are specific to materials covered under the Act, this SRB report estimate for plastic covered material is more accurate and resulted in a number lower than CalRecycle's previous estimate. The majority of the costs identified in CalRecycle's economic impact analysis are costs to meet required source reduction and recycling rate goals, including costs to switch plastic covered materials to more recyclable forms and to set up infrastructure for collecting, sorting, and processing increased amounts of material. These cost calculations rely directly upon the plastic covered material estimate. Using the SRB estimate for plastic covered material enables CalRecycle to more accurately estimate the costs to meet the required source reduction and recycling rates for plastic covered material and provides a more accurate overall estimate of the Act's implementation cost.

DOF Comment #2:

The SRIA must also provide a detailed methodology for the change in revenues to the Integrated Waste Management Account due to less plastic waste entering landfills.

CalRecycle Response:

Landfill revenue is generated by tipping fees, and CalRecycle estimated the change to tipping fee revenue by calculating the difference between the baseline covered material disposal amount and the amount of covered material expected to be disposed in California at the end of the implementation period. CalRecycle's calculations for the baseline and end of implementation covered material disposal amounts are shown in the Capacity Needs Analysis worksheet in the Direct Impacts Model. Per PRC section 48000(b)(1), tipping fees shall not exceed \$1.40 per ton of solid waste disposed. CalRecycle estimated that covered material disposal would decrease by 1.4 million tons annually by the end of the implementation period. CalRecycle multiplied the maximum tipping fee (\$1.40) by the difference in covered material disposal amounts in the baseline and at the end of the implementation period to arrive at the conservative estimate of annual tipping fee loss of around \$2 million.

DOF Comment #3:

Second, the estimate in the SRIA must be based on the most recently available data, forecasts, and timelines. For instance, the revised SRIA's estimates are currently based

on Finance’s economic forecast released in May 2023 and population projections released in January 2021. However, the most up-to-date and published forecasts reflect lower economic growth and higher inflation due to tariffs as well as significantly lower population. Incorporating these recent forecasts would likely lead to lower baseline activity and thus smaller costs and benefits.

CalRecycle Response:

CalRecycle has revised the Direct Impacts Model to include the most recent population projections from DOF, published in April 2025. CalRecycle previously estimated the total direct cost of implementing the regulations to be \$21,019,959,079 in the estimate submitted to DOF. Updating the economic impact analysis increased the total direct cost estimate to \$21,071,298,874, an increase of approximately \$59 million, which represents a percentage increase of only 0.28% in the cost estimation. Using the most recent population projections resulted in an increase to the direct cost estimates for collection, sortation, and processing infrastructure, but did not impact any of the other direct cost categories. CalRecycle’s benefits estimate was also not impacted by using the most recent population projections. The revised calculations adjusted the net impact figure by only -0.18%. This change therefore does not materially alter the overall estimation of costs and benefits as projected by the economic analysis in the draft SRIA.

CalRecycle has also revised the analysis of the macroeconomic impacts of the proposed regulations to include the most recent economic forecast from DOF. In the SRIA, CalRecycle presents data for years when macroeconomic impacts are at their peak in order to show which year incurs the greatest impacts. In the previous version of the analysis, the peak year was 2030, in the current version of the analysis, the peak year is 2031. A summary of the changes to the macroeconomic impact analysis is described below. The new numbers suggest that the macroeconomic benefits may be higher than projected in the draft SRIA, which presents the more conservative estimate in the second column below.

	2023 SRIA (Peak year 2030)	2025 SRIA (Peak year 2031)
Employment	220,000 jobs (through 2034)	229,000 jobs (through 2034)
Output growth	\$8.3 billion	\$10.4 billion
Investment	\$952 million	\$1.1 billion
Personal income	\$3.1 billion	\$3.7 billion
Gross State Product	\$4.5 billion	\$5.5 billion

The adjustments to the macroeconomic benefits estimates do not affect the core analysis of the direct economic impacts in the SRIA.

DOF Comment #4:

Additionally, the revised SRIA's total costs and benefits include estimates for previous fiscal years even though the proposed regulations have not been adopted yet.

CalRecycle Response:

For Extended Producer Responsibility (EPR) programs, unlike other regulatory programs, costs incurred prior to regulation adoption are billed to the Producer Responsibility Organization (PRO) after the regulations are in place and program implementation has begun and are therefore ultimately borne by industry. CalRecycle includes estimates in previous fiscal years in the economic impact analysis for program set up costs to establish and develop the program at CalRecycle and develop the implementing regulations. These costs are incurred during FY 2023-25. Costs including CalRecycle staff, Needs Assessment and CEQA contracts, and administrative overhead are shown for these years because they were incurred in these years. PRC Section 42053.5(b) contemplates the need for pre-implementation funding via a loan. Through a BCP CalRecycle borrowed the pre-implementation costs from the Beverage Container Recycling Fund which will ultimately be reimbursed by the PRO. PRC Section 42053.5(a)(1) requires the PRO to cover CalRecycle's full costs of implementing and enforcing this chapter, including the actual and reasonable costs associated with regulatory activities pursuant to this chapter before submission of producer responsibility plan. None of these costs have yet been reimbursed by the PRO.

COST IMPACTS TO REPRESENTATIVE PRIVATE PERSON OR BUSINESS

Compliance with the proposed regulations will increase costs for producers because single-use packaging and plastic single-use food service ware will be required to use materials that are recyclable, compostable, or reusable and may be more expensive than the traditional, very inexpensive materials widely used currently. The need to avoid design characteristics, such as those related to component sizes, inks, or adhesives, that make sorting and recycling more difficult may also result in increased manufacturing costs.

Producers and non-producers may incur costs related to documenting that certain materials comply with the Act's requirements. For example, producers of covered material claimed to be recyclable or compostable may incur costs to establish that the material meets applicable technical standards. Manufacturers, distributors, and sellers of packaging or food service ware claimed to be reusable or refillable may incur costs to establish that their products satisfy the criteria for being considered not "single-use." Producers may incur costs related to source reduction, such as the cost of obtaining validation from a third party of postconsumer recycled content or the cost of shifting to non-plastic materials.

Producers, through a PRO or otherwise, may also incur costs related to establishing alternative collection systems, establishing, and expanding recycling infrastructure, developing new materials and technologies, and establishing infrastructure for the convenient and safe reuse and refill of packaging or food service ware.

Producers that participate in a PRO plan will pay fees directly to the PRO according to the fee schedule established by the PRO, and the PRO will pay the circular economy administrative fee to CalRecycle. Producers, through the PRO or otherwise, will also pay annual environmental mitigation surcharges to the California Department of Tax and Fee Administration. Producers and the PRO will also incur costs related to developing and maintaining plans, record keeping, and annual reporting.

Local jurisdictions or recycling service providers may incur costs related to expanding the types of covered material included in their collection and recycling programs.

CalRecycle estimates the direct cost per household after full implementation of these regulations could potentially reach \$190 annually, the direct cost for a large producer to potentially reach \$457,114 annually, and the direct cost for businesses that are not producers but sell covered material to potentially reach \$4,806 annually.¹ The estimated costs to individuals in this analysis includes many assumptions regarding factors that will affect the actual, realized impacts to individuals, most notably decisions by the PRO and producers regarding their compliance pathways, as well as individual consumer decisions. These decisions may result in the actual impacts on individuals potentially being different from the estimates presented here.

BUSINESS REPORT

The proposed regulations address reporting requirements under sections 42051.3, 42052, and 42057 of the PRC and implement a reporting system that producers and the PRO must use to report certain information to CalRecycle. The reporting requirements apply to businesses. The proposed regulations specify the data that the PRO, producers participating in the PRO, and producers complying independently of a PRO are required to report. By specifying the reporting requirements, the proposed regulations implement specific statutory requirements and enable CalRecycle to provide necessary program oversight and ensure progress towards meeting statutory goals. The proposed regulations satisfy the requirement stated in Government Code Section 11346.3(d) that it is necessary for the health, safety, and welfare of the people of the state that the regulations apply to businesses.

DETERMINATION OF EFFECT ON SMALL BUSINESS

¹ With the updated forecasts incorporated into the Direct Impacts Model (see response to DOF Comment #3), the estimates shift slightly to \$191 annually for the direct cost per household, \$458,396 annually for the direct cost for a large producer, and \$4,820 annually for the direct cost for businesses that are not producers. These represent adjustments to the estimates in the range of 0.3-0.5%.

CalRecycle has determined that the proposed regulations will affect small businesses. CalRecycle has estimated that 58% of businesses impacted by the proposed regulations are considered small businesses. Small businesses that meet the definition of producer pursuant to section 42041(w) of the PRC, may be considered small producers, wholesalers, or retailers by the Act if in the most recent calendar year they had gross sales of less than one million dollars (\$1,000,000) in the state. The Act authorizes CalRecycle to develop a process to exempt these entities from most requirements of the Act. Producers of covered material granted an exemption will be considered “small producers,” will be exempt from the requirements of the Act other than the restrictions in section 42050(b) of the PRC, and will incur an annual cost of approximately \$155 for record keeping and preparation of exemption applications.² Small businesses that meet the definition of producer per section 42041(w) of the PRC but are denied an exemption based on a determination by CalRecycle will need to join an approved PRO or satisfy their legal obligations independently.

CalRecycle expects small businesses to benefit from increased revenue from the sale of products made from recycled material. Additionally, less effort will be needed to review recyclability claims of packaging, and there will be an increased ease of providing product packaging to fit consumer demand. There will also be a reduction in the cost of disposal services as more recyclable material is generated. However, the reduction in disposal costs may shift to recycling services as materials shift to recycling and composting collection streams.

CONSIDERATION OF ALTERNATIVES

In accordance with Government Code section 11346.5(a)(13), CalRecycle must determine that no reasonable alternative considered by the agency or that has otherwise been identified and brought to the attention of the agency would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

CalRecycle invites interested persons to present statements or arguments with respect to alternatives to the proposed regulations during the written comment period, or at the scheduled public hearing.

CONTACT PERSONS

Inquiries or comments concerning the proposed rulemaking action may be addressed to:

² The updated forecasts incorporated into the Direct Impacts Model (see response to DOF Comment #3) do not change this number.

Csilla Richmond
SB 54 Plastic Pollution Prevention and Packaging Producer Responsibility Act
Permanent Regulations
Department of Resources Recycling and Recovery, Regulations Unit
1001 "I" St., MS-24B, Sacramento, CA 95814
Phone: (916) 327-0089
Email: regulations@calrecycle.ca.gov

The backup contact person is:

Craig Castleton
SB 54 Plastic Pollution Prevention and Packaging Producer Responsibility Act
Permanent Regulations
Department of Resources Recycling and Recovery, Regulations Unit
1001 "I" St., MS-24B, Sacramento, CA 95814
Phone: (916) 327-0089
Email: regulations@calrecycle.ca.gov

AVAILABILITY STATEMENTS

Availability of Initial Statement of Reasons, Text of Proposed Regulations, Information Upon Which this Proposal is Based, and Rulemaking File

CalRecycle will have the entire rulemaking file, the express terms of the proposed regulations, and all information that provides the basis for the proposed action, available for public inspection and copying during normal business hours at the address provided above and on <https://calrecycle.ca.gov/Laws/Rulemaking/>. As of the date this Notice is published in the Notice Register, the rulemaking file consists of this Notice, the text of the proposed regulations, the Initial Statement of Reasons (ISOR), the documents relied upon for the proposed action, the Standardized Regulatory Impact Assessment, and the Economic and Fiscal Impact Statement. Copies may be obtained by contacting the contact persons at the address, email, or phone number listed above.

Availability of Modified Text

CalRecycle may adopt the proposed regulations substantially as described in this Notice. If CalRecycle makes substantial changes to the originally proposed text, it will make the modified text, with the changes clearly indicated, available to the public for at least fifteen (15) days before CalRecycle adopts the regulations as revised. Requests for the modified text should be made to the contact persons named above. CalRecycle will transmit any modified text to all persons who testify at the scheduled public hearing, all persons who submit a written comment at the scheduled public hearing, all persons whose comments are received during the comment period, and all persons who request notification of the availability of such changes. CalRecycle will accept written comments on the modified regulations for fifteen (15) days after the date on which they are made available.

Availability of the Final Statement of Reasons

Upon its completion, copies of the Final Statement of Reasons may be obtained by request from the contact persons identified in this Notice or accessed through CalRecycle's website at <https://calrecycle.ca.gov/Laws/Rulemaking/>.

INTERNET ACCESS

For more timely access to the rulemaking file, and in the interest of waste prevention, interested parties are encouraged to access CalRecycle's Internet webpage for the rulemaking at <https://calrecycle.ca.gov/Laws/Rulemaking/>. All rulemaking files can be downloaded directly from the website.



California Consultation Process



To develop an initial California program plan for SB 54, CAA is hosting a series of topic-based consultation webinars to solicit input from interest holders. Each webinar offers a dedicated opportunity to submit your insights, directly shaping a robust and effective plan for meeting California's ambitious recycling and packaging waste reduction goals.



Background

Since being selected as California's Producer Responsibility Organization (PRO) in January 2024, CAA has been actively engaging with a range of interested parties, including:

- Producers
- Trade associations
- Local governments
- Service providers
- End markets
- Environmental justice organizations
- Nongovernmental organizations

These ongoing dialogs are essential to deeply understand different perspectives and ensure the program plan is both practical and effective.

Our upcoming series of topic-based consultation webinars in October 2025 offer another opportunity to help shape California's program plan, slated for submission in June 2026. We look forward to engaging with thousands of individuals across California during this process.



CA Consultation Series		
Webinar Schedule		
Oct. 6	10 a.m. - 11 a.m. PT	Compostable Packaging and Single-Use Service Ware
Oct. 14	1 p.m. - 2 p.m. PT	Covered Cost and Payment Mechanism
Oct. 15	10 a.m. - 11 a.m. PT	Environmental Justice and Community Engagement
Oct. 16	11 a.m. - 12 p.m. PT	Reimbursement Cost Collection Analysis
Oct. 21	1 p.m. - 2 p.m. PT	Reimbursement MRF Cost Analysis
Oct. 22	10 a.m. - 11 a.m. PT	Responsible End Markets (REMs)
Oct. 23	9 a.m. - 10 a.m. PT	Education & Outreach
Oct. 28	1 p.m. - 2 p.m. PT	Fee-Setting Methodology and Allocation of Plastic Pollution Mitigation Fund
Oct. 30	10 a.m. - 11:30 a.m. PT	Source Reduction Requirements and Compliance Strategy
Nov. 4	1 p.m. - 2 p.m. PT	Reuse and Refill
Nov. 6	10 a.m. - 11:30 a.m. PT	Eco-modulation Approach Including Source Reduction Incentives

Consultation Sessions

Consultation sessions are open to all interested parties engaged with the respective topics. Each session will feature:

- A presentation from CAA outlining our proposed approach
- Q&A via chat submission
- Comprehensive post-webinar questionnaire to capture input and feedback

Fact sheets detailing the session's content will be posted a week before each webinar.

Environmental Justice and Community Engagement

Oct. 15, 2025, 10–11 a.m. PT

CAA is working to ensure education and outreach efforts reflect insights gained through engagement with the communities and populations most impacted by SB 54 and that implementation of the EPR plan avoids or minimizes negative environmental or public health impacts on disadvantaged or low-income communities. This webinar describes CAA's roles and intentions as it relates to engaging environmental justice and underserved or impacted communities, outlines recent steps taken and initial input



Compostable Packaging and Single-Use Service Ware

Oct. 6, 2025, 10-11 a.m. PT

This webinar explores two scenarios for compostable packaging and single-use food service ware (FSW) in terms of their eligibility to be labelled as “compostable” and their acceptance at processing facilities. It will cover the current policy landscape, the existing barriers to their use as a viable compliance pathway under SB 54, and the actions CAA proposes to take under each scenario to address those barriers.

Covered Cost and Payment Mechanism

Oct. 14, 2025, 1-2 p.m. PT

This webinar offers a high-level overview of the SB 54 covered cost and payment mechanism process. We'll walk through the current thinking around how funding applications may be submitted and evaluated, types of potential eligible costs, how payments might be issued and possible approaches to dispute resolution. We'll also share preliminary ideas for guidance materials and seek feedback to help shape the process moving forward.

[Register](#)

Reimbursement Cost Collection Analysis

Oct. 16, 2025, 11 a.m. – 12 p.m. PT



scenarios for collection jurisdictions and service providers.

[Register](#)

Reimbursement MRF Cost Analysis

Oct. 21, 2025, 1-2 p.m. PT

This webinar details regulatory and statutory requirements, and the process to establish 2022 base costs for MRF funding. We will review the model developed by local California consultants to assess the unique costs at MRFs across the state, and criteria used in this model. During the webinar, we will also provide an overview of the application and approval process for MRF projects, including payment options and funding scenarios.

[Register](#)

[Fact Sheet](#)



[Input Questionnaire](#)

Responsible End Markets (REMs)

Oct. 22, 2025, 10–11 a.m. PT

This webinar presents two aspects of REMs: how they are verified against the REM requirements in rules and how CAA will support end market development. The first section details the verification process, including preliminary Oregon results applicable to California and the current status of standard setting development. The second section explores preliminary end market gaps, materials strategy and possible high-level scenarios CAA is considering to develop, support, and sustain viable end markets.

[Register](#)

Education & Outreach

Oct. 23, 2025, 9–10 a.m. PT

This webinar outlines CAA's education and outreach (E&O) strategy, focusing on collaboration, best practices and measurement. We'll also dive into California's specific approach, including statutory obligations, consumer research themes and next steps.



[Register](#)

Fee-Setting Methodology and Allocation of Plastic Pollution Mitigation Fund

Oct. 28, 2025, 1-2 p.m. PT

This webinar introduces the CAA national fee-setting methodology, covering its principles, data inputs, Cost to Manage Index (CTM), calculation flows and how it applies to SB 54 requirements. Key content includes fee-setting data inputs, budget development, allocation of the Plastic Pollution Mitigation Fund (PPMF) and other fee-setting elements.

[Register](#)

Source Reduction Requirements and Compliance Strategy

Oct. 30, 2025, 10-11:30 a.m. PT

This webinar clarifies compliance targets and CAA's approach to completing source reduction plans. It details CAA's efforts to facilitate compliance and present the source reduction incentive framework, covering its principles, objectives, research learnings, instruments, quotas, caps, values, implementation timing and pre-conditions for credit trading.



[Register](#)

Reuse and Refill

Nov. 4, 2025, 1-2 p.m. PT

This webinar explores California's reuse and refill landscape, including known infrastructure gaps and barriers identified, as well as opportunities to expand reuse/refill state-wide. It will also discuss avenues CAA is considering to achieve reuse, refill, and elimination targets through infrastructure investment, retailer engagement, and enabling consumer behavior change.

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source reduction levers that will be critical for achieving producer source reduction goals by 2027, 2030, and 2032. We'll also provide a snapshot of statutory eco-modulation requirements across EPR-enacted states.

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Compostable Packaging and Single-Use Food Service Ware

California Fall 2025 Consultations

October 6, 2025

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California Fall 2025 Consultations

Meeting Agenda

1. Introductions
2. About CAA
3. Compostable Packaging and Single-Use Service Ware
4. Q&A
5. Next Steps



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2

Introductions



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3

Team Introductions



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CA Executive Director



Isabelle Faucher
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Recycling Operations
Manager



Pierre Benabides
Technical Advisor
(REMs)



Frances Oney
Actum
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- Pricing strategies, methods, trends, plans, or timing of price changes;
- Salaries, costs, and other factors that affect pricing; the hiring or recruitment of other members' employees;
- Allocation of markets or customers or division of territories;
- Topics that may lead participants to not deal with or to boycott a particular supplier, customer, or third party;
- Reductions of output; bid-rigging;
- Or any other anti-competitive topics or actions.

Failure to comply with these antitrust laws will not be accepted.



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Important Reminders

- This webinar will be recorded and will be available (along with the presentation deck) on CAA's California webpage: <https://circularactionalliance.org/ca-consultation>
- A post-webinar questionnaire will be sent out after each session, which we ask to be completed within 30 days
- Please place all questions and comments in the chat; we will work through as many as we can during this session
- To get through all the presentation content and as many questions as possible, all participants will remain muted throughout this session
- CAA provides updates on program plan development at the Producer Responsibility Advisory Board meetings, which anyone can register for and attend: <https://calrecycle.ca.gov/packaging/packaging-epr/advisoryboard/>



California Fall 2025 Consultations

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CA Consultation Series Schedule

Topics	
10/6	Compostable Packaging and Single-Use Service Ware
10/14	Covered Cost and Payment Mechanism
10/15	Environmental Justice and Community Engagement
10/16	Reimbursement Cost Collection Analysis
10/21	Reimbursement MRF Cost Analysis
10/22	Responsible End Markets (REMs)
10/23	Education and Outreach
10/28	Fee-Setting Methodology and Allocation of the Plastic Pollution Mitigation Fund
10/30	Source Reduction Requirements and Compliance Strategy
11/4	Reuse and Refill
11/6	Eco-Modulation Approach including Source Reduction Incentives

- All sessions are via Zoom dial-in
- Questionnaires will be sent after each session to solicit feedback
- Individuals can register at: <https://circularactionalliance.org/ca-consultation>



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About CAA

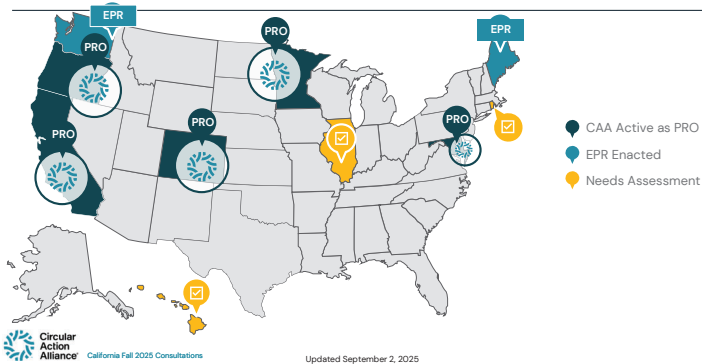
1. What is CAA?
2. Who & where is CAA?
3. What does CAA do?
4. Why your input matters

What is CAA? The U.S. Paper & Packaging PRO

- Circular Action Alliance (CAA) is a 501(c)(3) nonprofit PRO dedicated to implementing effective EPR laws for paper and packaging in the U.S.
- CAA was founded by companies from the food, beverage, consumer goods, and retail industries.
- CAA has been approved to be the single PRO in California, Colorado, Minnesota, Oregon, and Maryland.



Who & Where is CAA?



The Role of the PRO

A **Producer Responsibility Organization (PRO)** is a producer-led, non-profit organization that manages and improves the system for collecting and recovering materials after use. We ensure compliance with Extended Producer Responsibility (EPR) laws, leading to positive environmental outcomes for communities.



Roles

CAA: Planning & Implementation

- Non-profit organization formed by producers to implement SB 54
- Develops EPR plan
- Collects producer fees to fund system operations
- Designs and implements education & outreach campaigns
- Engages environmental justice, disadvantaged communities & other interest holders in planning and outreach
- Invests in collection, processing, recycling, and reuse systems
- Pays annual taxes to California Department of Tax and Fee Administration for mitigation fund
- Reports annually on progress and impacts

CalRecycle: Regulations & Oversight

- State agency overseeing SB 54 implementation
- Reviews and approves EPR plan
- Sets regulations, standards, & requirements
- Conducts needs assessments
- Administers mitigation funds (along with other state agencies as appropriated) and ensures allocations benefit all communities
- Protects ratepayers by ensuring PRO covers local government costs
- Reviews annual reports, conducts audits, and enforces compliance

By 2032:

Reduce 25%*
of Single-Use Plastic

*10% from reuse/refill

Recycle 65%
of Single-Use Plastic

Compliance obligation:
PRO

Ensure 100%
Packaging is Recyclable or Compostable

Compliance obligation:
Individual producers



Compostable Packaging and Single-Use Service Ware

Context

- SB 54 requires producers to ensure that 100% of single-use packaging and food service ware sold in the state is recyclable or **compostable by 2032**
- In today's consultation, we will:
 - Unpack what "being compostable" means in California
 - Provide an overview of the current landscape and barriers that exist today
 - Share CAA's proposed approach to compostables (Levers and Funding Eligibility Requirements)
 - Take questions and receive feedback from interest holders



Source: www.compostconnect.org



Program Plan Requirements

- Material Management:** share how CAA will support the collection, processing, and development of Responsible End Markets (REMs) for compostable packaging
- Integration with solid waste network:** discuss how CAA will build on existing collection and composting infrastructure (*supplemental to* – not in conflict with)
- Education:** provide an overview of CAA's education efforts to promote collection and reduce contamination

Eligibility for Being Labeled Compostable

Under SB 54, covered material sold in the state must be recyclable or **eligible for being labeled "compostable" in accordance with the requirements of AB 1201:**

National Organic Program (NOP) Compliance	Must qualify as an allowable input under the USDA NOP starting June 30, 2027 (18-month extension was granted in June 2025). Extension allows certified compostable plastic items to continue making compostability claim, even though they're NOT allowable organic inputs.
Design for Compostability	Must be intended for composting with food scraps, yard waste, etc.
PFAS Restriction	Does not have total organic fluorine concentration greater than 100 ppm
Clear Labeling	Must be visibly distinguishable from non-compostable products to support consumer understanding and efficient processing at facilities
Third-Party Certification	(Exemption for fiber-only products without plastics)

NOP, NOSB, and Compostables in Organic Agriculture

- Who Does What**
 - National Organic Program (NOP): USDA program, sets organic national standards
 - National Organic Standards Board (NOSB): Federal advisory board; recommends changes to the National List (list of substances allowed and prohibited in organic agriculture)
- Current Rules**
 - National List bans synthetic feedstocks in compost used in organic farming
 - Exception: Newspaper/recycled paper (no glossy/colored inks)
 - Certified compostable plastics = "synthetic" → Not Allowed
- Petition and Next Steps**
 - 2023: BPI petitioned USDA for rule-making: to update compost definition & recognize ASTM compostability standards
 - USDA asked NOSB to submit feedback/recommendation on petition; Technical Report commissioned; released April 2025
 - Nov 5, 2025: Issue to be addressed at NOSB Fall meeting

Unknowns

To be determined whether what's currently considered compostable by CalRecycle will change.

- Extension of NOP allowance deadline under AB 1201 (to June 2027)
- Whether the NOSB will vote on the issue on November 5 and what its impact will be on the USDA / NOP's final decision
- Whether plastics designed to be compostable will be considered compostable at the time of CAA's program launch – and if so, for how long



Covered Material Categories* Eligible to be Labeled Compostable (as of 1/1/2025)

Category	Representative Example
Waxed Cardboard Without Plastic ("Natural" wax only)	Produce boxes
Wood Pallets and Crates	Wine boxes, untreated wood single-use pallets, tea boxes
Other Organic Packaging	Mushroom, algal or bamboo packaging
Other Organic Materials (small)	Cork, twine
Uncoated Paper/Fiber Packaging (excludes food service ware)**	Molded fiber berry containers Clay coated pizza boxes Uncoated food soiled packaging

Current Landscape: Acceptance

- Current organics collection guidelines in many California communities **exclude** compostable plastic and food service ware
- Wax coated cardboard and untreated wood are not commonly accepted
- Paper and fiber packaging without a plastic component is typically accepted (guidelines often specify "food-soiled")
- Most communities would need to update their programs and guidelines:
 - Minor changes → to accept currently eligible compostables
 - Major changes → to accept the full scope of compostables



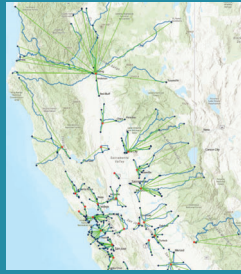
City of Los Angeles

City of Sacramento

City of San Diego

Current Landscape: Processing

- 41 active mixed composting facilities (CalRecycle SWIS Facility database)
- About 3.3 M tons of organics processed in 2024 (food waste, green waste, mixed organics)
 - 10X more green waste processed than food waste
- Needs Assessment is expected to provide more recent and granular information on capacities, throughput, etc.



2024 RDRS Composting Related Outflows (Tons)	
Green Waste	2,300,000
Mixed Organics	804,000
Food Waste	228,000

Barriers and Solutions: Engagement

CAA engaged an external consultant to gather perspectives on barriers and solutions to compostables as a viable compliance pathway under SB 54 from different interest holders (40+ interviews):

- Processing Facilities (Composters and AD Operators)
- Producers & Compostable Packaging Manufacturers
- Trade Associations
- SME / Certifier / Regulator
- Local Jurisdictions



Barriers Identified: HIGH Consensus Level

Issue	Description
Issue 1: Limited Acceptance	Many facilities do not accept the broad scope of compostable packaging and service ware and view them as undesirable.
Issue 2: Identification of Compostables	Operators are unable to distinguish certified compostable plastics from "look-alike" non-compostables.
Issue 3: High Rates of Plastic Contamination at Facilities	High levels of plastic contamination at compost facilities (regardless of compostables acceptance); removal is costly.
Issue 4: Consumer Confusion	Consumers are confused about compostables, which leads to improper disposal practices and contamination.
Issue 5: Insufficient Composting Capacity	California has limited composting capacity, constraining acceptance of new materials.

Barriers Identified: MEDUM to LOW Consensus Level

Issue	Description
Issue 6: Prevalence of Depackaging Equipment	Depackaging systems remove all packaging (both conventional and compostable) before organics processing.
Issue 7: Markets & Quality Requirements	Most compost produced in CA is destined to agricultural sector; organic certification used as a quality benchmark even though compost is sold to conventional agricultural market.
Issue 8: Coupling of Product Labeling Requirements with NOP Standards	Product labeling requirements in CA are tied to NOP standards. NOP rules (25+ years old) favor fiber products and disadvantage emerging materials (e.g., PHAs). NOSB process to update the National List is lengthy and complex.
Issue 9: In-Field Performance of Compostables	Some facilities report poor disintegration of compostables, especially where short processing times limit material breakdown.

Two-Pronged Approach to Compostables Management

OPTION A: Narrow Scope CMC List as of Jan 2025	OPTION B: Full Scope NOP Compliance Deadline Re-extended / NOP Amended
- Waxed cardboard (non-synthetic wax only) - Untreated wood pallets and crates - Other organic packaging (e.g., mushroom, algal, bamboo) - Paper / fiber packaging	All CMCs in Option A + - Certified fiber packaging & service ware w/compostable plastic - Certified compostable plastic packaging & service ware - Textile packaging (non synthetic, e.g., cotton bags)
Options A CMCs + Source: MN Composting Council OPTIONS MAY CO-EXIST	

If this → Then That

IF...	THEN...
Plastics designed to be composted considered compostable by CalRecycle at the time of CAA's Program launch	Options A and B may co-exist Service Providers collect & process either narrow or expanded scope of materials
Plastics designed to be composted not considered compostable by CalRecycle at CAA Program Plan launch or during implementation	Only Option A becomes available

Four Potential Levers to Support Compostables

Source: WA Department of Ecology Labeling Guidance	Source: City of Toledo, OH Acceptable Material Incentive	Source: US Composting Council Processing Incentive	Source: US Composting Council Market Development Initiative
---	---	---	--

Incentives would be offered on a tiered level (e.g., a different incentive amount for service providers accepting/processing materials under Option A vs. Option B)

Labeling Guidance

In the absence of state-mandated labeling practices, CAA could provide guidance to its producers to help with:

- Ensuring material is compliant with SB 1201's third-party certification requirements
- Avoiding "look-alikes" and deceptive marketing
 - Green, brown, or beige color, tint, or quarter-inch stripe
 - Include the word "compostable", where possible
 - Certification logo that indicates certified compostable, when applicable



Acceptable Material Incentive

- Offer 'per stop' incentive to programs that accept target materials
 - Different incentive amounts for Option A vs Option B
- Examples of what incentive could fund:
 - Education & Outreach to encourage proper participation in composting collection
 - Enforcement at the curb (e.g., lid flip, cart tags) to reduce contamination



City of Menlo Park



San Francisco Environment Department



Essex Windsor Solid Waste Authority

Processing Incentive for Organic Processing Facilities

- Financial incentive provided to operators that process targeted covered materials
 - Higher incentive amount for Option B than for Option A
 - Incentive would be based on total throughput, capped to a maximum amount per facility
- Non-prescriptive: could be used for contamination removal, process bifurcation, equipment purchase, etc.
- Organics processing facilities who use depackagers would only be eligible for the incentive if:
 - Equipment allows target material into compost pile, or
 - Target material is bifurcated directly to compost pile
- Periodic third-party audits to be conducted
 - To measure the amount of target material (i.e., compostable packaging) entering the facility and enable CAA reporting
 - To measure the impact of E&O on contamination levels



End Market Development

- Grant-based approach to spur innovation for expanding non-organic compost end markets
- Make funds available for pilots and tests
- Examples include uses in transportation, construction and development, soil application, rangeland remediation, and carbon sequestration



Source: US Composting Council

Closed Venues

- Consensus across interview participants
 - Closed venues represent the most viable pathway for successful compostable packaging collection & processing
 - 'Controlled' environments (e.g., farmers markets, schools, cafeterias, sports venues, attractions) control inputs and can limit contamination
- Some California organics facilities are already processing controlled venue feedstock
 - E.g., San Diego's Petco Park and Republic Services

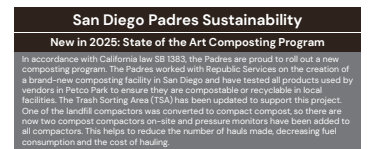


Image courtesy of the San Diego Padres

Funding Eligibility Requirements

To be eligible for an incentive, organics processing facilities would have to prove:

1. They accept in-scope compostable materials (Option A / B)
2. They meet the USCC Seal of Testing Assurance requirements (or equivalent) for compost product sampling and testing
3. They responsibly process in-scope compostable materials (Option A / B)
 - Leverage recently published ASTM Standards, which establish Defined Operating Conditions adapted from The Composting Handbook (e.g., T*, moisture, C:N, pH, etc.)
4. They meet forthcoming CAA REM Standard
 - Compliance with Laws, Regulations and Labor policies
 - Environmentally-Sound
 - Monitoring and reporting requirement

Q&A

Next Steps

- Provide input through the online questionnaire: [HERE](https://circularactionalliance.org/ca-consultation)
- Questionnaire will be open until November 6, 2025
- Session attendees will also receive an email from Zoom with the questionnaire link
- Today's presentation and questionnaire will also be posted online at: <https://circularactionalliance.org/ca-consultation>



Next Steps

Thank You



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What's in California's Landfills: Measuring Single-Use Packaging and Plastic Food Service Ware Disposed 2025

Revised Preliminary Report



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Executive Summary and Background

Lawmakers enacted the [Plastic Pollution Prevention and Packaging Producer Responsibility Act](#) (Senate Bill (SB) 54, Allen, Chapter 75, Statutes of 2022) (the Act), establishing an extended producer responsibility (EPR) program to reduce single-use packaging and plastic single-use food service ware (covered material) in California. The Act requires all covered material to be recyclable or compostable, while also setting specific source reduction and recycling rate requirements for plastic covered material.

The Act requires the California Department of Resources Recycling and Recovery (CalRecycle) to conduct a material characterization study of covered material categories and determine the approximate amount of covered material disposed of in California landfills. Public Resources Code (PRC) section 42061(a)(2)-(3).

CalRecycle contracted with Cascadia Consulting Group (Cascadia) to conduct a statewide material characterization study to characterize and measure the amount of covered material landfilled in California. Fieldwork, which included hand-sorting samples at California landfills, occurred between February and April 2025. CalRecycle and Cascadia designed a study that used representative, cost-effective sampling and analysis methods to gather data while minimizing disruption to facility operators. CalRecycle published preliminary findings from this study on June 30, 2025.

The Revised Preliminary Findings Report provides estimates of the amount of covered material landfilled in California, by weight (tons) and as a proportion of total material landfilled statewide. CalRecycle conducted advanced statistical analyses on data from the study published in June 2025, and this revised report reflects the results of that expanded analysis. It also incorporates additional analyses of resin types of plastic covered material that could not be readily identified in the field, as well as estimates of the weight of covered material discarded together with food or other goods. Additionally, the report provides weight-to-volume conversion factors for certain covered material.

It was estimated that 8,457,149 tons of covered material were disposed of in California in 2024, representing about 21.1% of the state's total landfill disposal. Table E-1 shows additional details on the estimated disposal of covered material categories (CMCs) by material class.

Table E-1. Estimated Disposal of Covered Material, By Material Class

This table shows the estimated annual disposal tonnage (column 2) and the percentage of total statewide material disposal (column 3) for covered material within each material class. Column 4 shows the CMC within each material class estimated to have the largest amount of material disposed of.

Material Class	Annual Disposal Estimate of Covered Material (tons)	Percentage of Total Estimated Covered Material Disposal	Highest Tonnage Covered Material Category in Material Class
Paper and Fiber	3,929,375	46.5%	Cardboard
Plastic	3,123,797	36.9%	Flexible and Film Items
Wood and other Organic Materials	811,999	9.6%	All Untreated Forms
Metal	432,265	5.1%	Non-aerosol Containers
Glass	154,149	1.8%	Bottles and Jars
Ceramic	5,564	0.1%	Small - Two or more sides measuring 2" or less

For more detailed findings, refer to the Summary of Findings section. The findings presented are specific to covered material under the Act and do not provide granular information about other materials. Revised preliminary data on other materials are included in Appendix 1.

Overview of Changes

This section summarizes revisions made in this Revised Preliminary Findings Report compared to the Preliminary Findings Report ([DRRR-2025-1755](#)) published June 30, 2025.

This Revised Preliminary Findings Report incorporates the following revisions:

Main report

- Revised statistical analysis to account for interdependent and non-normal distribution of material characterization study data, including:
 - Summary description of the frequentist modeling methodology.
 - Addition of confidence intervals (Table 5-A) and updated numbers in Tables 5-A, 5-B and 6.
- Summary of methodology for determining weight-to-volume conversion factors for certain covered materials.

Appendix 1

- Revised statistical analysis of the study sort data by applying the frequentist model.
 - Statistical modeling methodology
 - Updated data from statistical modeling, including confidence intervals: Tables A7-A, A7-B, and A8
- Weight-to-volume conversion factors for certain covered materials
 - Detailed methodology for determining weight-to-volume conversion factors
 - Addition of Table A9-1 with weight-to-volume conversion factor (Density measurements)
 - Rare material categories not analyzed for weight-to-volume conversion factor measurements: Table A9-2

Appendix 2

- Public comments received by CalRecycle from June 30, 2025, through Sept. 15, 2025.

Public Feedback and Next Steps

PRC section 42061(a)(7) directs CalRecycle to publish preliminary findings of the study and conduct a public meeting to present those findings and receive public comments. CalRecycle published the [SB 54 Preliminary Findings Report](#) on June 30, 2025. This report updates the study's findings and integrates additional advanced statistical analyses of the data. CalRecycle continues to accept written feedback, plans to hold a public meeting in October 2025 to further solicit public comments, and will finalize the report within 60 days of the public meeting.

All written feedback can be submitted to wastechar@calrecycle.ca.gov with the subject line: SB 54 MCS Revised Preliminary Findings.

Data Records Available Pursuant to the California Public Records Act

Public records related to this report can be requested through the [CalRecycle Public Records Portal](#) and include records documenting analysis steps, often as scripts in the R Statistical Program:

- Estimates of statewide disposal, all materials
- Estimates of statewide disposal, covered material
- Percentage composition of each material type within covered material classes
- Composition estimates for material types within sectors

Methods

Overview

To estimate statewide disposal of covered material, two main steps were taken. First, sampling was conducted at 16 landfills across California to estimate the composition of landfilled materials by waste-generating sector. Second, the composition data were

extrapolated to estimate statewide disposal using calendar year 2024 data submitted to CalRecycle's Recycling and Disposal Reporting System (RDRS).

A random sampling methodology was used to sample waste from various sectors to develop a waste composition profile for each sector. The four sectors considered in this study included: (1) franchised single-family residential; (2) franchised commercial and multi-family residential; (3) self-hauled; and (4) mixed waste (i.e., material from transfer trailers). Data from each sector were then combined based on their relative contributions to the overall waste stream using RDRS data. This produced statewide estimates of landfilled material by sorted material category.

For all sectors, only deliveries destined for landfill disposal were eligible for sampling, including construction and demolition (C&D) debris. Loads of disaster debris (e.g., storm deadfall and soil), universal waste, material sent for recycling or recovery, biosolids, designated waste, aggregates and soil set aside for beneficial use, alternative daily cover (ADC), and household hazardous waste (HHW) were not sampled and are excluded from the study.

For the purposes of this study and throughout the report, the CalRecycle field team is referred to as "CalRecycle staff," and the Cascadia-contracted field team is referred to as "contractor staff."

The following sections provide additional information about the methodology used in each step. Appendix 1: Detailed Methodology (Section 1: Detailed Methodology) presents more detailed study design and methodology.

Estimating Composition of Landfilled Material in California

To gather the data needed to estimate overall waste composition in the state, samples of waste were collected at California landfills and sorted based on CMCs.

Landfill Selection

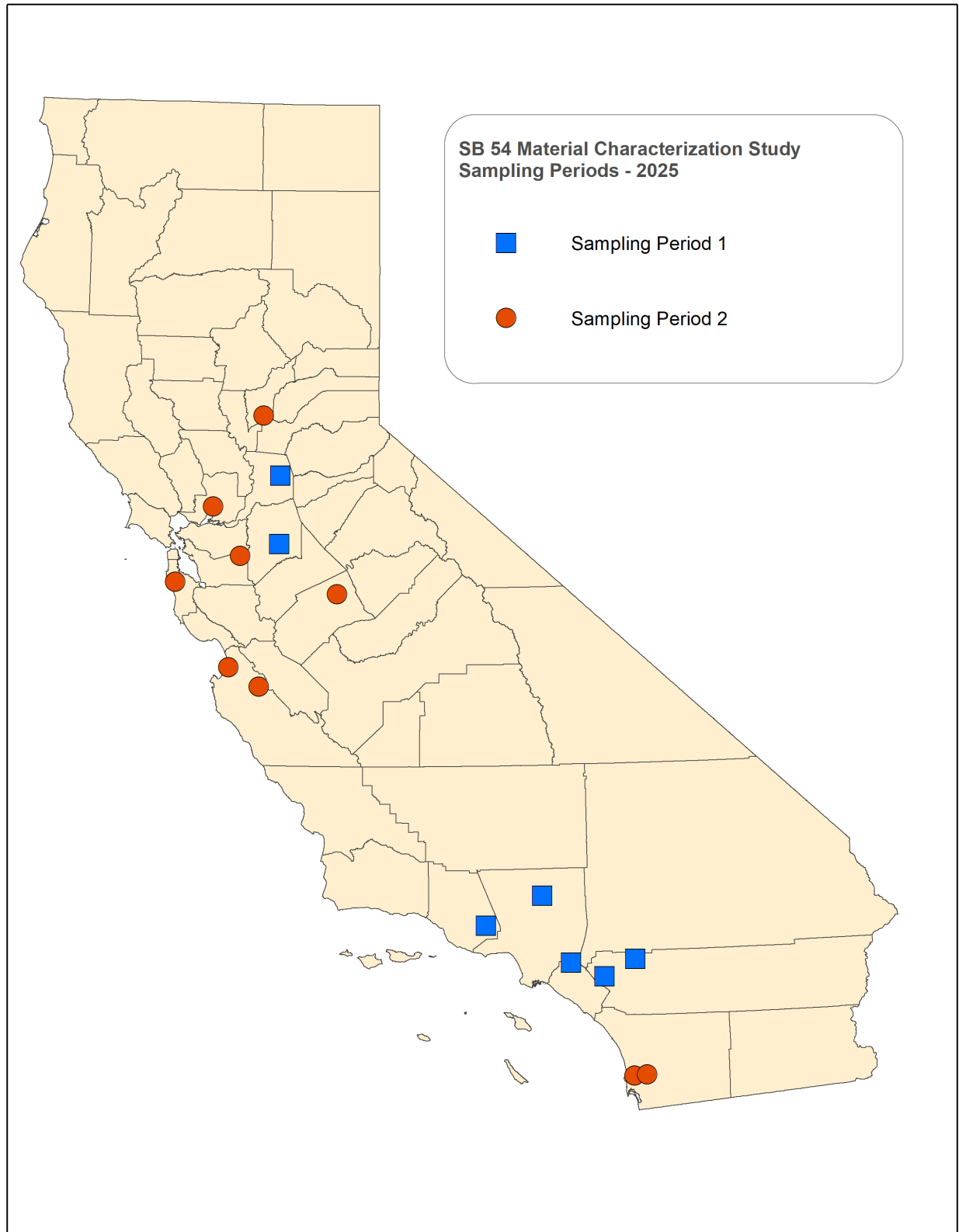
To maximize the collection of data representative of California, landfills that account for a higher proportion of the state's waste stream were prioritized for inclusion in the study. Additionally, to capture data across the four sectors, landfills with the largest annual inflow tonnage that received material from the four sectors were also prioritized. Participation by landfills in this study was voluntary. In total, 16 landfill sites participated (Table 1; Figure 1). The study was conducted over two sampling periods. Each period spanned roughly 14 calendar days, with approximately two days of sampling at each site. Appendix 1: Detailed Methodology (Section 1.2: Facility Selection and Sample Allocation) provides additional details.

Table 1. List of Participating Study Landfills

This table provides the facility name, county where the facility is located, and the CalRecycle Solid Waste Information System (SWIS) number.

Facility Name	County	SWIS Number
Altamont Landfill & Resource Recovery	Alameda	01-AA-0009
Antelope Valley Recycling & Disposal Facility	Los Angeles	19-AA-5624
Badlands Landfill	Riverside	33-AA-0006
Corinda Los Trancos Landfill (Ox Mtn)	San Mateo	41-AA-0002
El Sobrante Landfill	Riverside	33-AA-0217
Forward Landfill	Alameda	39-AA-0015
Highway 59 Landfill	Merced	24-AA-0001
Johnson Canyon Sanitary Landfill	Monterey	27-AA-0005
Kiefer Landfill	Sacramento	34-AA-0001
Monterey Peninsula Landfill	Monterey	27-AA-0010
Olinda Alpha Sanitary Landfill	Orange	30-AB-0035
Potrero Hills Landfill	Solano	48-AA-0075
Recology Ostrom Road Landfill	Yuba	58-AA-0011
Simi Valley Landfill & Recycling Center	Ventura	56-AA-0007
Otay Landfill	San Diego	37-AA-0010
West Miramar Sanitary Landfill	San Diego	37-AA-0020

Figure 1. Map of participating study landfills by sampling period



Sorting Categories

In accordance with the Act, CalRecycle developed covered material categories (CMCs), [published July 1, 2024](#). These categories classify covered material by material type and form. Recyclability and compostability determinations for those categories were added in the [Dec. 31, 2024 updated publication](#). Each CMC is a combination of one material from one of six classes (ceramic, glass, metal, paper and fiber, plastic, or wood or other organic material) and a particular type and form of that material (e.g. CMC Code 24_M4P identifies Class: Metal, Type: Aluminum, and Form: Aerosol Can with a Plastic Component). The categories apply individually to each detachable component of covered material. In addition to the six material classes, one additional material class — miscellaneous — was used for this study. It included a category for covered material discarded with a good still inside (e.g., partially filled bottle of lotion, a meal discarded in a plastic takeout container, or sausages discarded in their wrapper).

To identify and sort items based on the CMCs, 83 material sorting categories were established. These were based on how materials are found at landfills (e.g., broken or contaminated) and the feasibility of material identification and sorting in the field. During the study, contractor staff sorted each sample into one of the 83 categories from the Material Characterization Study Sorting List (Table 2) to provide material type composition data for each sample. The complete material sorting list, with definitions and examples for each category, is provided in Appendix 1 (Section 1.1, Table A1).

Generally, each of the 83 material sorting categories included only one of the following types of materials:

- Covered material (i.e., single-use packaging and single-use plastic food service ware covered under the Act),
- Potentially reusable alternatives to covered material (e.g., reusable milk jug), and
- All other material that is not covered under the Act.

Materials not covered under the Act were itemized into either a remainder category according to material class or sorted into the miscellaneous class. Remainder categories served as a catch-all for items, specific to class, that were not covered material. The miscellaneous class contained categories for hazardous materials, small items measuring 2 inches or smaller in at least two dimensions (i.e., mixed residue), and discarded covered material with a good inside.

Material sorting categories that included covered material not predominantly made of plastic were generally a combination of two CMCs — one for that material type without a plastic component and one for the same material type with a plastic component. For example, “Glass Bottles and Jars that are covered material” was a single sorting category but included two CMCs: one for Glass Bottles and Jars with a plastic component (CMC Code 24_G1P) and one for Glass Bottles and Jars without a plastic component (CMC Code 24_G1N). In these scenarios, the combined CMC Code reflected in the material sorting list is a combination of the two CMCs, such as Code 24_G1N/P.

The material types are specifically defined in Appendix 1: Detailed Methodology (Section 1.1: Sorting Categories List and Sorting Guidance, Table A1). Table A1 provides the sorting rules used in the field to determine the inclusion or exclusion of each item in the sorting categories. Additional details on sample sorting and characterization are provided in Appendix 1: Detailed Methodology (Section 1.7: Sample Characterization).

Table 2. Material Characterization Study Sorting List

The information in this table provides a complete list of categories used to sort samples for the study. Each sorting category identifies a combination of material class, material type, and form. The first column in the table is a numeric count. Note: The count column is not ordered sequentially, as it aligns with the CMC List published Dec. 31, 2024. The second column describes the material class (glass, ceramic, metal, paper and fiber, plastic, wood and other organic materials). The third column describes the material type, and the fourth column describes the form of the covered materials in that CMC. The fifth column, labeled Combined CMC Code, includes the specific code that identifies which CMCs are included within each sorting category. These codes refer to the CMCs list published Dec. 31, 2024, pursuant to the Act. All sorting categories with a corresponding code starting with the “24_” prefix are specific to covered material. Additionally, in the Combined CMC Code column, the alphanumeric material code ends with an “N” and/or a “P” indicating whether the item contains an inseparable plastic component (P) or contains no plastic component (N). An “N/P” indicates that the material form contains two covered material categories, one with and one without inseparable plastic components. Entries in the Combined CMC Code column with the following text mean:

- “Potential reuse”: categories for packaging and food service ware that may be reusable or refillable,
- “Mixture”: categories in which a covered material was jointly discarded with other material (e.g., food discarded in original packaging), and
- “n/a”: remainder categories for materials other than covered material.

The complete material sorting list with definitions and examples for each category is provided in Appendix 1 (Section 1.1, Table A1).

Count	Class	Type	Form	Combined CMC Code
1	Glass	Glass	Bottles and Jars	24_G1N/P
2	Glass	Glass	Other Forms	24_G2N/P
4	Glass	Glass	Small – Two or more sides measuring 2” or less	24_G3N/P
3	Glass	Glass	Potentially Reusable Packaging and Food Service Ware	Potential Reuse
5	Glass	Glass	Remainder/Composite Glass	n/a
6	Ceramic	Ceramic	All Forms	24_C1N/P
8	Ceramic	Ceramic	Small – Two or more sides measuring 2” or less	24_C2N/P
7	Ceramic	Ceramic	Potentially Reusable Packaging and Food Service Ware	Potential Reuse

Count	Class	Type	Form	Combined CMC Code
9	Ceramic	Ceramic	Remainder/Composite Ceramic	n/a
10	Metal	Aluminum	Non-aerosol Containers	24_M1N/P
11	Metal	Aluminum	Foil Sheets	24_M2N/P
12	Metal	Aluminum	Foil Molded Containers	24_M3N/P
13	Metal	Aluminum	Aerosol Cans	24_M4P
14	Metal	Aluminum	Other Forms	24_M5N/P
15	Metal	Tin/Steel/Bimetal	Non-aerosol Containers	24_M6N/P
16	Metal	Tin/Steel/Bimetal	Aerosol Cans	24_M7P
17	Metal	Tin/Steel/Bimetal	Other Forms	24_M8N/P
18	Metal	Other Non-Ferrous	All Other Forms	24_M9N/P
19	Metal	Other Ferrous	All Other Forms	24_M10N/P
21	Metal	Metal	Small – Two or more sides measuring 2” or less	24_M12N/P
20	Metal	Metal	Potentially Reusable Packaging and Food Service Ware	Potential Reuse
22	Metal	Metal	Remainder/Composite Metal	n/a
23	Paper/Fiber	Kraft Paper	All Forms	24_PF1N/P
24	Paper/Fiber	Molded Fiber	All Forms	24_PF14N/P
25	Paper/Fiber	Multi-Material Laminates	Aseptic Cartons	24_PF15P
26	Paper/Fiber	Multi-Material Laminates	Gable-top Cartons	24_PF5P
29	Paper/Fiber	Multi-Material Laminates	Other Forms	24_PF7P
27	Paper/Fiber	OCC	Waxed Cardboard	24_PF8N/P
28	Paper/Fiber	OCC	Cardboard	24_PF9N/P
30	Paper/Fiber	Paperboard	All Forms	24_PF10N/P
31	Paper/Fiber	White Paper	All Forms	24_PF11N/P
32	Paper/Fiber	Other/Mixed Paper	All Forms	24_PF12N/P
34	Paper/Fiber	Paper/ Fiber	Small – Two or more sides measuring 2” or less	24_PF16N/P

Count	Class	Type	Form	Combined CMC Code
33	Paper/Fiber	Other/ Mixed Paper	Potentially Reusable Packaging and Food Service Ware	Potential Reuse
35	Paper/Fiber	Other/Mixed Paper	Remainder/Composite Mixed Paper	n/a
36	Plastic	PET (#1)	Bottles, Jugs, and Jars (Clear/Natural)	24_P1P
37	Plastic	PET (#1)	Bottles, Jugs, and Jars (Pigmented/Color)	24_P2P
38	Plastic	PET (#1)	Other Rigid Containers, Cups, Lids Plates, Trays, Tubs	24_P38P
39	Plastic	PET (#1)	Other Rigid Items	24_P39P
40	Plastic	PET (#1)	Flexible and Film Items	24_P5P
41	Plastic	HDPE (#2)	Bottles, Jugs, and Jars (Clear/Natural)	24_P6P
42	Plastic	HDPE (#2)	Bottles, Jugs, and Jars (Pigmented/Color)	24_P7P
43	Plastic	HDPE (#2)	Pails and Buckets	24_P8P
44	Plastic	HDPE (#2)	Other Rigid Items	24_P40P
45	Plastic	HDPE (#2)	Flexible and Film Items	24_P10P
46	Plastic	PVC (#3)	Rigid Items	24_P11P
47	Plastic	PVC (#3)	Flexible and Film	24_P12P
48	Plastic	LDPE (#4)	Bottles, Jugs, and Jars	24_P13P
49	Plastic	LDPE (#4)	Other Rigid Items	24_P14P
50	Plastic	LDPE (#4)	Clear Non-Bag Film	24_P15P
51	Plastic	LDPE (#4)	Other Flexible and Film Items	24_P16P
52	Plastic	PP (#5)	Bottles, Jugs, and Jars	24_P17P
53	Plastic	PP (#5)	Other Rigid Containers, Cups, Lids, Plates, Trays, and Tubs	24_P41P
54	Plastic	PP (#5)	Utensils	24_P19P
55	Plastic	PP (#5)	Other Rigid Items	24_P20P
56	Plastic	PP (#5)	Clear Non-Bag Film	24_P21P
57	Plastic	PP (#5)	Other Flexible and Film Items	24_P22P
58	Plastic	PS (#6)	Expanded/Foamed Hinged Containers, Plates, Cups, Tubs, Trays, and Other Foamed Containers	24_P23P
59	Plastic	PS (#6)	Other Expanded/Foamed Forms	24_P42P
60	Plastic	PS (#6)	Utensils	24_P27P

Count	Class	Type	Form	Combined CMC Code
61	Plastic	PS (#6)	Solid Hinged Containers, Plates, Cups, Tubs, Trays, and Other Solid Forms	24_P43P
62	Plastic	PS (#6)	Flexible and Film Items	24_P29P
63	Plastic	Plastics and Polymers Designed for Compostability	Rigid Items	24_P44P
64	Plastic	Plastics and Polymers Designed for Compostability	Flexible and Film Items	24_P45P
65	Plastic	Multi-Material Laminate	Pouches and Envelopes	24_P46P
66	Plastic	Multi-Material Laminate	Other Forms	24_P33P
67	Plastic	Other/ Mixed Plastics	Textiles (non-organic/synthetic)	24_P34P
68	Plastic	Other/ Mixed Plastics	Rigid Items	24_P35P
69	Plastic	Other/ Mixed Plastics	Flexible and Film Items	24_P36P
71	Plastic	Plastic	Small – Two or more sides measuring 2” or less	24_P47P
70	Plastic	Plastic	Potentially Reusable Packaging and Food Service Ware	Potential Reuse
72	Plastic	Plastic	Remainder/Composite Plastic	n/a
73	Wood and Other Organic Materials	Wood	All Untreated Forms	24_WO1N/P
74	Wood and Other Organic Materials	Wood	All Treated or Painted Forms	24_WO2N/P
75	Wood and Other Organic Materials	Other/Mixed Organic	Textiles	24_WO3N/P

Count	Class	Type	Form	Combined CMC Code
76	Wood and Other Organic Materials	Other/Mixed Organic	Other Forms	24_WO4N/P
79	Wood and Other Organic Materials	Wood and Other Organic	Small – Two or more sides measuring 2” or less	24_WO6N/P
78	Wood and Other Organic Materials	Other/Mixed Organic	Potentially Reusable Packaging and Food Service Ware	Potential Reuse
77	Wood and Other Organic Materials	Other/Mixed Organic	Food Discarded in Original Packaging or Food Service Ware	Mixture
80	Wood and Other Organic Materials	Other/Mixed Organic	Remainder/Composite Organic	n/a
81	Miscellaneous	Miscellaneous	Non-Food Discarded in Original Packaging	Mixture
83	Miscellaneous	Miscellaneous	Mixed Residue	n/a
82	Miscellaneous	Miscellaneous	Remainder Miscellaneous	n/a

Vehicle Surveys

As part of data collection, contractor staff conducted surveys at facilities to gather information on the sector of incoming vehicles, select specific vehicles for sampling, and collect additional data on the selected vehicles — such as the net weight of the load. The vehicle survey data were used to estimate the contribution of each waste sector at each participating facility to the overall waste sector throughout the state.

More details on the vehicle surveys, the data collected and analyzed, and the vehicle selection process for sampling can be found in Appendix 1: Detailed Methodology (Section 1.5: Vehicle Surveys).

Sample Collection and Sorting

Contractor staff collected 313 waste samples across all sectors at the 16 landfills for composition analysis. An additional four samples were collected that did not meet the specifications for inclusion in the overall waste composition analysis but were still considered in the additional analyses completed by contractor staff (see section Additional Analysis Performed by Contractor Staff).

From randomly identified residential route trucks, commercial route trucks, self-hauled loads, and transfer trailers, contractor staff collected one sample weighing at least 200 pounds from each selected vehicle. If, during a sampling day, the expected commercial vehicles or transfer trailers were anticipated to be fewer than needed to meet sampling targets, contractor staff collected two samples per vehicle for those types. Double sampling was not allowed from residential route trucks. Table 3 shows the sample distribution among the four sectors.

Table 3. Distribution of Samples by Waste-Generating Sector

Sector	Period 1	Period 2	Total
Franchised Single-family Residential (RES)	36	47	83
Franchised Commercial & Multi-family Residential (COM)	69	71	140
Self-haul (SH)	31	31	62
Mixed Waste (MIX)	14	14	28
Total	150	163	313

Additional Analysis Performed by Contractor Staff

To collect additional data on the amount and type of covered material, contractor staff completed additional analyses on (1) covered material made of plastic with an unknown resin type, (2) covered material disposed of with a good inside, and (3) weight-to-volume conversion factors for sorting categories that include covered material. This section describes those additional analyses.

Covered Material Made of Plastic of Hard-to-Identify Resin Type

Contractor staff sorted covered material made primarily of plastic that could not be readily identified in the field as a resin type #1 through #6 into one of two categories: (1) Other/Mixed Plastics Rigid Items (Count 68 in the material sorting list). or (2)

Other/Mixed Plastics Flexible and Film Items (Count 69 in the material sorting list). As with other sorting categories, the weights of materials in these categories were recorded. Throughout the study, contractor staff collected a selection of items from these categories for further analysis. They applied the Cone and Quarter method (illustrated in Appendix 1: Section 1.7: Sample Characterization, Figure B2) to generate a random selection of material in those categories for resin identification analysis. Contractor staff sent the items to an off-site lab, Stina Inc., for analysis using resin spectroscopy to identify the plastic resin type: PET (#1), HDPE (#2), PVC (#3), LDPE (#4), PP (#5), PS (#6), and other or unknown resins. A total of 1,090 covered material items of unknown resin type were analyzed.

Due to collection methods and differing methods of nomenclature, the resin analysis results were not associated with specific samples, facilities, or sectors. As a result, the findings are presented as stand-alone results. The results of the resin analysis are described in Section Additional Analysis: Spectroscopic Analysis of Hard-to-Identify Resins, Tables 7-A and 7-B – Resin Composition Among Plastic Samples.

Covered Material Disposed of with the Good Inside (Depackaging Analysis)

Covered material disposed of with the good still inside (e.g., a partially filled bottle of lotion, a meal discarded in a plastic takeout container, or sausages discarded in their wrapper) was sorted into one of two categories: one for food discarded in covered material (Count 77 in the material sorting list), and one for all other goods discarded in covered material (Count 81 in the material sorting list). For a subset of materials in those two categories, contractor staff separated the covered material from the good. Contractor staff brushed, shook, scraped, spooned, and wiped the contaminant materials out of and off the covered packaging material, collecting the contaminants in a bin. After separation and dry cleaning, the weight of the covered material was recorded by material class. These data were used to estimate the proportional weight of the covered material in each of the two original categories.

Weight-to-Volume Conversion Factors for Sorting Categories with Covered Material

To provide additional context to the measured weights of covered materials landfilled in California, contractor staff collected additional data to calculate weight-to-volume conversion factors for each sorting category that included covered material. For the 67 sorting categories, after sorting was completed, contractor staff weighed the sorted material in containers of known volume, yielding a weight-to-volume correlation. This information was then used to calculate a volume-to-weight conversion factor by sorting category. Contractor staff conducted this analysis throughout the study. The results are presented in Table A9-A in Appendix 1. Information on sorting categories that were rarely encountered and not analyzed is presented in Appendix 1, Table A9-B. For a more detailed methodology refer to Appendix 1 (Section 1: Sample Characterization: Covered Material Weight-to-Volume Conversion Factor).

Data Considerations

There are multiple methodological factors to consider when interpreting the findings of this study. Due to the nature of waste disposal, some rare types of covered material (e.g., single-use ceramic packaging) may not have been collected because of the relatively small proportion of material sampled compared to total statewide disposal. Additionally, samples, especially those in the self-haul and commercial sectors, were often mostly homogenous. For example, a single randomly selected self-haul sample consisted almost entirely of concrete. These factors result in a dataset with many CMCs that were rarely observed, and some samples were mostly homogenous.

Analyzing waste disposal data poses unique challenges. Waste characterization is a compositional analysis, meaning collected data are interdependent. The waste stream is composed of a study-defined number of material types, and the analysis aims to understand what proportion of the stream is composed of each material type. Analytical methods in the revised preliminary report were updated to assume data followed a Dirichlet distribution, which is appropriate for compositional data. This method does not allow the composition of any material type to be zero in any sample. As such, analytical methods must correct for samples with missing material types. In this study, that correction was accomplished through randomization of samples (see Appendix 1; Additional Analysis; Composition Estimates). Additional details and explanations of these analyses can be found in Appendix 1: Section 1.

Additional Analysis Performed by CalRecycle Quality Control Sort

CalRecycle staff conducted a quality control sort on all Remainder/Composite categories from the material sorting list to assess sorting accuracy. This process was executed as follows: (1) after contractor staff completed the initial sort into the 83 sorting categories, the materials in the Remainder/Composite categories were weighed; (2) for a subset of samples, CalRecycle staff then conducted a second sort of those materials to identify any additional covered material that had been missed. The weights of any additional covered material discovered were later incorporated into the data, as described in the following section.

Calculation of Composition Data Calculating Final Material Composition

To calculate the final material composition, which combines data from the main sort and the quality control sort for a given sample (i.e., the percentage of each sorting category in a given sample), the following equation was applied:

$$S = \frac{[M + Q(i) + D(i)]}{T} \times 100$$

- S = percentage by weight of a specific sorting category within a given sample
- M = weight of material within a specific sorting category **from sort**
- Q = weight of a material within a specific material **class** from the **quality control sort**

- i = percentage by weight that a specific sorting category accounts for within a material class (see next subsection for more details)
- D = weight of material within a specific material class from the **depackaging analysis**
- T = Total weight of all material in the sample

Estimating Percentage (i)

Weight data on covered material disposed of, captured during the additional analysis on depackaging and the quality control sort, was collected at the material class level. To apply this weight to specific sorting categories, a study-wide estimate was made of the proportion each sorting category represented within its material class. Table A6 (Appendix 1, Section 2: Data Analysis) provides the average (mean) weight each sorting category accounted for within a material class over the entire study period. To estimate these proportions, the following equation was used to estimate i for each sample. These values were then averaged across the entire study.

$$i(\text{sample}) = \frac{\text{Weight of a material type and form in the sample}}{\text{Weight of the sample}} \times 100$$

This composition data, along with other information and data gathered during the study period, were used to extrapolate study findings to statewide levels, as detailed in the following subsections.

Estimating Disposal by Sector and Statewide

To estimate confidence intervals and produce estimates of CMC proportions within sectors and statewide, modeling was conducted in R Statistical Program. First, CMC proportions were calculated within each sample. A CMC proportion is the proportion of total disposed of material in a given sample, by weight, that the CMC accounts for. This is compositional data, describing the relative frequencies of the multiple components (in this case, CMCs and nonCMC remainder categories) which sum to a constant value of 1. These proportions are assumed to follow a Dirichlet distribution, a common model for compositional data. In a dataset following the Dirichlet distribution, events can be classified into three or more discrete options (e.g., a sample of disposed of material can be classified as four different material types), and the occurrence of events is best understood as proportions (e.g., 30% of a sample is composed of material type X, by weight) that will sum to a value of 1 (or 100%).

A frequentist model was then applied, assuming the Dirichlet distribution, to estimate CMC proportions. A frequentist model is a statistical approach used to estimate the population-wide value of a parameter (such as the proportion of total disposal that is material type X) from a sample of the population. Using the Dirichlet distribution, CMC proportions were estimated based on properties such as arithmetic mean and density. Frequentist statistics were chosen for computational efficiency over other methods. This produced estimates of the mean (average) and 95% confidence intervals for each CMC proportion within each sector.

Next, results for each CMC within each sector were scaled and summed to estimate statewide results. The statewide estimates for each CMC were calculated as:

$$D = (C_R \times T_R) + (C_C \times T_C) + (C_M \times T_M) + (C_S \times T_S)$$

- D = statewide estimate of the material category
- C_R = estimate from Residential sector data
- T_R = proportion of study-wide disposal tonnage from Residential sector
- C_C = estimate from Commercial sector data
- T_C = proportion of study-wide disposal tonnage from Commercial sector
- C_M = estimate from Mixed Waste sector data
- T_M = proportion of study-wide disposal tonnage from Mixed Waste sector
- C_S = estimate from Self Haul sector data
- T_S = proportion of study-wide disposal tonnage from Self Haul sector

Total statewide annual disposal tonnage for 2024 was retrieved from (RDRS) Report 8: Statewide Totals for Disposal and Disposal-Related Materials (May 2025). The resulting statewide proportion means (averages) for each CMC were multiplied by the total statewide disposal tonnage to estimate statewide annual disposal for each CMC in tons.

This modeling strategy was used to generate the data in Tables 5-A, 5-B, 6, and Appendix Tables A7-A and A8. For more details, see Appendix (Section 2: Additional Analysis: Statistical Analysis Methods).

Disposal Estimates by Sorting Category

The analysis produced four estimates for each of the sorting categories. This information is provided at both the statewide level and by sector. The four estimates include:

1. The average annual weight of landfilled material, expressed as the mean.
2. The proportion of overall disposal (percent – by weight) of each sorting category, expressed as the mean.
3. The lower and upper bounds (2.5% and 97.5%) of the 95% confidence interval for the estimate of disposal proportion.

Summary of Findings

This section provides the statewide-level findings from the study. The first subsection presents the primary findings — specifically, estimates of the proportions and amounts of covered material landfilled in California by sorting category. The second subsection presents findings from an additional analysis to identify the resin types of covered material for plastic items where the resin type could not be identified in the field.

The findings in this section, including the data tables, summarize data collected during the study regarding covered material, as well as data generated through statistical modeling. Data tables reflecting results from the additional analyses of potentially reusable and Remainder/Composite categories can be found in Appendix 1. During the study, 4,613 pounds of covered material items were collected and sorted as the basis for these estimates. The quality control sort identified additional covered material in 118

samples, totaling 237 pounds. The depackaging analysis identified additional covered material in 93 samples, totaling 173 pounds. In total, the Remainder/Composite (quality control) sort and depackaging analysis identified an additional 6% of covered material items by weight.

Estimates of Statewide Disposal of All Material

In 2024, an estimated 40,035,748 tons of material were sent for disposal in California landfills. Table 4 shows the disposal estimates for each sector based on vehicle surveys and RDRS statewide total disposal tonnage (RDRS data accessed May 2025). For each sector, the percentage of disposal from that sector and the total disposal (tons) for 2024 are shown. The sum of the percentages in the second column may not equal exactly 100% due to rounding.

Table 4. Estimates of Statewide Landfill Disposal from each Sector

Sector	Percentage of Disposal Tonnage Originating from Sector	2024 Disposal Estimate (Tons)
Franchised Commercial	26.6%	10,629,343
Franchised Residential	12.6%	5,023,433
Mixed	49.8%	19,919,907
Self-Haul	11.2%	4,463,065
Total	100%	40,035,748

Estimates of Statewide Disposal of Covered Material

In 2024, an estimated 8,457,149 tons of covered material were disposed of in California landfills. Covered material accounted for 21.1% of total statewide disposal. By material class, paper and fiber was the most landfilled covered material, with an estimated 3,929,375 tons disposed of, followed by plastic, with an estimated 3,123,797 tons.

Table 5-A shows estimates of covered material landfilled in California in 2024, by material class, including weight (in tons) and each class's proportion of the total landfilled waste stream.

Table 5-A. Estimates of Statewide Disposal of Material Classes in 2024

Material Class	Average (mean) Annual Statewide Disposal (tons)	Percentage of Total Statewide Disposal	95% Confidence Interval for Percentage of Total Statewide Disposal	Proportion of Covered Material Disposal
Ceramic	5,564	0.01%	0.00% - 0.08%	0.07%
Glass	154,149	0.39%	0.10% - 1.12%	1.82%
Metal	432,265	1.08%	0.13% - 4.04%	5.11%
Plastic	3,123,797	7.80%	2.44% - 19.96%	36.94%
Paper and Fiber	3,929,375	9.81%	5.66% - 16.24%	46.46%
Wood and Other Organic Materials	811,999	2.03%	1.07% - 3.71%	9.60%
Total	8,457,149	21.12%	9.41% - 45.15%	100%

Table 5-B shows estimated proportions of disposal by material class and sector. Column 3 provides the estimated proportion of total disposal for all material in a material class, including material not covered under the Act. Column 4 provides the estimated proportion of total disposal for covered material within each material class, with total disposal including both covered and noncovered material. Column 5 provides the estimated proportion of total covered material disposal for each covered material within each material class. Any rows with "n/a" for CMC disposal estimates indicate that covered material in that material class was not observed within the relevant sector.

Table 5-B. Estimates of Disposal by Material Class and Sector in 2024

Material Class	Sector	For Material Type, Estimated Proportion of Total Disposal (by Weight)	For CMC only, Estimated Proportion of Total Disposal (by Weight)	For CMC only, Estimated Proportion of CMC Disposal (by Weight)
Ceramic	Franchised Commercial	0.43%	0.03%	0.13%
Glass	Franchised Commercial	1.46%	0.35%	1.52%
Metal	Franchised Commercial	4.52%	0.99%	4.29%
Paper and Fiber	Franchised Commercial	17.11%	9.62%	41.70%
Plastic	Franchised Commercial	15.15%	7.89%	34.20%
Wood and Other Organic Materials	Franchised Commercial	25.45%	4.19%	18.16%
Ceramic	Franchised Residential	0.21%	0.04%	0.22%
Glass	Franchised Residential	2.47%	0.80%	4.37%
Metal	Franchised Residential	3.88%	1.29%	7.04%
Paper and Fiber	Franchised Residential	19.24%	7.97%	43.50%
Plastic	Franchised Residential	14.62%	8.17%	44.60%

Material Class	Sector	For Material Type, Estimated Proportion of Total Disposal (by Weight)	For CMC only, Estimated Proportion of Total Disposal (by Weight)	For CMC only, Estimated Proportion of CMC Disposal (by Weight)
Wood and Other Organic Materials	Franchised Residential	29.28%	0.05%	0.27%
Ceramic	Mixed	0.43%	n/a	n/a
Glass	Mixed	1.29%	0.39%	1.68%
Metal	Mixed	3.73%	1.22%	5.24%
Paper and Fiber	Mixed	18.37%	11.34%	48.73%
Plastic	Mixed	16.25%	8.94%	38.42%
Wood and Other Organic Materials	Mixed	17.96%	1.38%	5.93%
Ceramic	Self-haul	2.08%	n/a	n/a
Glass	Self-haul	0.11%	n/a	n/a
Metal	Self-haul	5.84%	0.42%	4.17%
Paper and Fiber	Self-haul	6.76%	5.57%	55.37%
Plastic	Self-haul	3.54%	2.10%	20.87%
Wood and Other Organic Materials	Self-haul	12.30%	1.97%	19.58%

Table 6. Estimates of Statewide Disposal by Covered Material Category in 2024

Table 6 shows estimates of the amounts of covered material landfilled in California in 2024, by sorting category. The table includes weight (in tons), the proportion of the total waste stream, and the proportion of covered material disposed of.

Materials within certain CMCs were rarely found in samples, including: Ceramic all forms (24_C1N/P); Glass Other Forms (24_G2N/P); Plastic LDPE Bottles, Jugs, and Jars (24_P17P); Plastic PS Flexible and Film (24_P29P); Plastic PET Flexible and Film (24_P5P); Other/Mixed Organic Textile (24_WO3N/P); and Other/Mixed Organic Other Forms (24_WO4N/P). Since these items were rarely detected during sampling, it indicates their presence is likely rare in statewide disposal.

Each row of the table contains data for a covered material sorting category. The first four columns identify the sorting category by combined CMC code, material class, material type, and material form. The fifth column is the annual average (mean) statewide disposal estimate in tons. The sixth column is the proportion of total statewide disposal that each sorting category accounts for. All sorting categories with a corresponding code starting with "24_" are categories specific to covered material that was published in the CMC list released Jan. 1, 2025. Additionally, in the code column, the alphanumeric material code ends with an "N" and/or a "P" indicating whether the item contains an inseparable plastic component (P) or contains no plastic component (N). An "N/P" indicates that the material form contains two covered material categories, one with and one without inseparable plastic components.

Confidence intervals for these estimates were calculated (Section 2: Data Analysis: Additional Analysis: Composition Estimates) and are presented in Appendix 1 (Section 2: Table A8).

Combined CMC Code	Material Class	Material Type	Material Form	Estimated Average (mean) Annual Statewide Disposal (tons)	Estimated Proportion of Total Statewide Disposal
24_G1N/P	Glass	Glass	Bottles and Jars	130,502	0.33%
24_G2N/P	Glass	Glass	Other Forms	9,249	0.02%
24_G3N/P	Glass	Glass	Small - Two or more sides measuring 2" or less	14,398	0.04%
24_C1N/P	Ceramic	Ceramic	All Forms	1,172	0.00%
24_C2N/P	Ceramic	Ceramic	Small - Two or more sides measuring 2" or less	4,391	0.01%
24_M1N/P	Metal	Aluminum	Non-aerosol Containers	24,454	0.06%
24_M2N/P	Metal	Aluminum	Foil Sheets	66,305	0.17%
24_M3N/P	Metal	Aluminum	Foil Molded Containers	32,213	0.08%
24_M4P	Metal	Aluminum	Aerosol can	19,392	0.05%
24_M5N/P	Metal	Aluminum	Other Forms	24,533	0.06%
24_M6N/P	Metal	Tin/Steel/Bimetal	Non-aerosol Containers	137,393	0.34%

Combined CMC Code	Material Class	Material Type	Material Form	Estimated Average (mean) Annual Statewide Disposal (tons)	Estimated Proportion of Total Statewide Disposal
24_M7P	Metal	Tin/Steel/Bimetal	Aerosol Can	38,929	0.10%
24_M8N/P	Metal	Tin/Steel/Bimetal	Other Forms	44,148	0.11%
24_M9N/P	Metal	Other Nonferrous	All Forms	11,762	0.03%
24_M10N/P	Metal	Other Ferrous	All Forms	19,579	0.05%
24_M12N/P	Metal	Metal	Small - Two or more sides measuring 2" or less	13,557	0.03%
24_PF1N/P	Paper and Fiber	Kraft Paper	All Forms	289,887	0.72%
24_PF14N/P	Paper and Fiber	Molded Fiber	All Forms	163,462	0.41%
24_PF15P	Paper and Fiber	Multi-Material Lamininate	Aseptic Cartons	57,344	0.14%
24_PF5P	Paper and Fiber	Multi-Material Lamininate	Gable-top Cartons	84,452	0.21%
24_PF7P	Paper and Fiber	Multi-Material Lamininate	Other Forms	549,429	1.37%
24_PF8N/P	Paper and Fiber	OCC	Waxed Cardboard	109,451	0.27%
24_PF9N/P	Paper and Fiber	OCC	Cardboard	2,042,929	5.10%
24_PF10N/P	Paper and Fiber	Paperboard	All Forms	487,428	1.22%
24_PF11N/P	Paper and Fiber	White Paper	All Forms	18,512	0.05%
24_PF12N/P	Paper and Fiber	Other/Mixed Paper	All Forms	112,428	0.28%
24_PF16N/P	Paper and Fiber	Paper and Fiber	Small - Two or more sides measuring 2" or less	14,054	0.04%

Combined CMC Code	Material Class	Material Type	Material Form	Estimated Average (mean) Annual Statewide Disposal (tons)	Estimated Proportion of Total Statewide Disposal
24_P1P	Plastic	PET (#1)	Bottles, Jugs, and Jars (Clear/Natural)	80,445	0.20%
24_P2P	Plastic	PET (#1)	Bottles, Jugs, and Jars (Pigmented/Color)	42,204	0.11%
24_P38P	Plastic	PET (#1)	Other Rigid Containers, Cups, Lids, Plates, Trays, and Tubs	204,712	0.51%
24_P39P	Plastic	PET (#1)	Other Rigid Items	24,929	0.06%
24_P5P	Plastic	PET (#1)	Flexible and Film Items	9,568	0.02%
24_P6P	Plastic	HDPE (#2)	Bottles, Jugs, and Jars (Clear/Natural)	99,816	0.25%
24_P7P	Plastic	HDPE (#2)	Bottles, Jugs, and Jars (Pigmented/Color)	94,893	0.24%
24_P8P	Plastic	HDPE (#2)	Pails and Buckets	62,945	0.16%
24_P40P	Plastic	HDPE (#2)	Other Rigid Items	50,724	0.13%
24_P10P	Plastic	HDPE (#2)	Flexible and Film Items	48,778	0.12%
24_P11P	Plastic	PVC (#3)	Rigid Items	16,679	0.04%
24_P12P	Plastic	PVC (#3)	Flexible and Film Items	18,125	0.05%
24_P13P	Plastic	LDPE (#4)	Bottles, Jugs, and Jars	8,850	0.02%
24_P14P	Plastic	LDPE (#4)	Other Rigid Items	19,351	0.05%
24_P15P	Plastic	LDPE (#4)	Clear Non-Bag Film	263,481	0.66%
24_P16P	Plastic	LDPE (#4)	Other Flexible and Film Items	290,978	0.73%
24_P17P	Plastic	PP (#5)	Bottles, Jugs, and Jars	14,411	0.04%
24_P41P	Plastic	PP (#5)	Other Rigid Containers, Cups, Lids, Plates, Trays, and Tubs	371,670	0.93%
24_P19P	Plastic	PP (#5)	Utensils	28,091	0.07%
24_P20P	Plastic	PP (#5)	Other Rigid Items	67,550	0.17%

Combined CMC Code	Material Class	Material Type	Material Form	Estimated Average (mean) Annual Statewide Disposal (tons)	Estimated Proportion of Total Statewide Disposal
24_P21P	Plastic	PP (#5)	Clear Non-Bag Film	15,639	0.04%
24_P22P	Plastic	PP (#5)	Other Flexible and Film Items	31,560	0.08%
24_P23P	Plastic	PS (#6)	Expanded/Foamed Hinged Containers, Plates, Cups, Tubs, Trays, and Other Foamed Containers	62,525	0.16%
24_P42P	Plastic	PS (#6)	Other Expanded/Foamed Forms	68,405	0.17%
24_P27P	Plastic	PS (#6)	Utensils	27,176	0.07%
24_P43P	Plastic	PS (#6)	Solid Hinged Containers, Plates, Cups, Tubs, Trays, and Other Solid Forms	75,115	0.19%
24_P29P	Plastic	PS (#6)	Flexible and Film Items	11,189	0.03%
24_P44P	Plastic	Plastics and Polymers Designed for Compostability	Rigid Items	25,519	0.06%
24_P45P	Plastic	Plastics and Polymers Designed for Compostability	Flexible and Film Items	15,247	0.04%
24_P46P	Plastic	Multi-Material Laminate	Pouches and Envelopes	58,962	0.15%
24_P33P	Plastic	Multi-Material Laminate	Other Forms	72,604	0.18%
24_P34P	Plastic	Other/Mixed Plastics	Textiles	25,786	0.06%

Combined CMC Code	Material Class	Material Type	Material Form	Estimated Average (mean) Annual Statewide Disposal (tons)	Estimated Proportion of Total Statewide Disposal
24_P35P	Plastic	Other/Mixed Plastics	Rigid Items	117,993	0.29%
24_P36P	Plastic	Other/Mixed Plastics	Flexible and Film Items	650,085	1.62%
24_P47P	Plastic	Plastic	Small - Two or more sides measuring 2" or less	47,791	0.12%
24_WO1N/P	Wood and Other Organic Materials	Wood	All Untreated Forms	703,062	1.76%
24_WO2N/P	Wood and Other Organic Materials	Wood	All Treated or Painted Forms	87,378	0.22%
24_WO3N/P	Wood and Other Organic Materials	Other/Mixed Organic	Textiles	6,386	0.02%
24_WO4N/P	Wood and Other Organic Materials	Other/Mixed Organic	Other Forms	5,369	0.01%
24_WO6N/P	Wood and Other Organic Materials	Wood and Other Organic Materials	Small - Two or more sides measuring 2" or less	9,804	0.02%

Additional Analysis: Spectroscopic Analysis of Hard-to-Identify Resins

Resin Composition Among Plastic Samples

This section presents the results from resin analysis performed on covered material that was sorted but whose dominant plastic type could not be readily distinguished by resin type in the field. Contractor staff sorted a total of 1,090 items from the following categories: Count 68 – Other/Mixed Plastics Rigid Items (527 individual items) and Count 69 – Other/Mixed Plastics Flexible and Film Items (563 individual items). These items were sent to Stina Inc. for identification using resin spectroscopy.

The resin analysis results showed two key findings: (1) among the Other/Mixed Plastics Rigid items, HDPE (#2) and LDPE (#4) were the most prevalent resin types, together accounting for nearly 50% of the 527 items analyzed (Table 7-A); and (2) among the Other/Mixed Plastics Flexible and Film items, Other or Unknown Resins and PP (#5) were the most prevalent resin types, also making up nearly 50% of the 563 items analyzed (Table 7-B).

Tables 7-A and 7-B contain information from the study sort and resin analysis of hard-to-identify resins. The first column lists the resin type; the second column shows the number of instances the resin was found; and the third column indicates the percentage of resin prevalence. The sum of the percentages in the third column may not equal exactly 100% due to rounding. Within the sort, multiple CMCs within each resin type are summed for the material forms “Rigid Items (Table 7-A)” and “Flexible and Film Items (Table 7-B).”

Table 7-A. Resin Composition Among Other/Mixed Plastics Rigid Samples

Resin Type	Number of Items in which this Resin was Identified	Percent of Items in which this Resin was Identified
PET (#1)	93	17.7%
HDPE (#2)	108	20.5%
PVC (#3)	10	1.9%
LDPE (#4)	141	26.8%
PP (#5)	100	19.0%
PS (#6)	0	0.0%
Other/Unknown	54	10.3%
Non-Plastic	21	4.0%

Table 7-B. Resin Composition Among Other/Mixed Plastics Flexible and Film Samples

Resin Type	Number of Items in which this Resin was Identified	Percent of Items in which this Resin was Identified
PET (#1)	93	16.5%
HDPE (#2)	60	10.7%
PVC (#3)	13	2.3%
LDPE (#4)	19	3.4%
PP (#5)	193	34.3%
PS (#6)	36	6.4%
Other/Unknown	99	17.6%
Non-Plastic	50	8.9%

Glossary of Terms

Additional Analysis: Refers to additional sorting and analysis performed by the contractor for the following:

- Covered material made primarily of plastic that could not be readily identified in the field as being composed of resin types #1 through #6 was sorted into one of two categories: (1) rigid items (Count 68 in the material sorting list) composed of other or unidentifiable plastic resin types, and (2) flexible and film items (Count 69 in the material sorting list) composed of other or unidentifiable plastic resin types. These samples were sent to an off-site laboratory for resin identification.
- Covered material disposed of with the good still inside (Count 81 in the material sorting list) or with food still inside (Count 77 in the material sorting list) was depackaged to obtain the weight of covered material without any contents.

Confidence Interval: A confidence interval refers to a range of values that will contain the true value. Confidence intervals always have an associated probability level. Unless otherwise noted, this report calculates confidence intervals at the 95% level. The 95% confidence intervals provided in this report have the following interpretation: If the dataset underlying a confidence interval was recreated many times and a new confidence interval was created for each dataset, then 95% of those intervals would contain the true value. This interpretation differs slightly from assuming that any one confidence interval has a 95% probability of containing the true value. However, if we assume that the process generating datasets is consistent, we can interpret the specific confidence intervals in this report as indicating a 95% probability that the true value lies within the 95% confidence interval. This assumption is common in scientific literature.

Contractor Staff: Refers to field staff under contract with CalRecycle to perform sampling and sorting. This includes primary contractor staff and any subcontractor staff.

Covered Material: Single-use packaging and single-use plastic food service ware covered under SB 54 (PRC section 42041(e)(1)).

Covered Material Categories: Categories that include covered material of a similar type and form. Additional details regarding the covered material categories can be found on the [SB 54 Covered Material Categories List webpage](#).

Dirichlet Distribution: In statistics, a distribution is a function that shows the probability of observing events. The Dirichlet distribution shows such probabilities for proportional events. That is, if the types of observable events can be classified into three or more discrete options (e.g., a sample of disposed of material can be divided into four different material types), and if the occurrence of events is best understood as proportions (e.g., 30% of a weight sample is material type X), then the Dirichlet distribution will model the probability of observing such proportions.

Frequentist Model: A statistical approach used to estimate the population-wide value for a parameter (such as the proportion of the total landfill disposal stream that is material type X) from a sample of the population. The approach works by finding the value of the population-wide parameter that maximizes the probability of observing the original data.

Landfilled: Material destined for final deposition in a landfill with no further processing. The following types of material were excluded from the study: (1) disaster debris (e.g., storm deadfall and soil), (2) universal waste, (3) material sent for recycling or recovery, (4) biosolids, (5) designated waste, (6) aggregates and soil set aside for beneficial use, (7) alternative daily cover, and (8) household hazardous waste.

Mean: The arithmetic average of a set of numbers.

Maximum Likelihood: A method of estimating the attributes, or parameters, of an assumed probability distribution, given the observed data.

Multivariate Normal Distribution: A generalization of the one-dimensional normal distribution to problems of higher dimensions. The normal distribution is a type of probability distribution for a random variable.

Sectors: A unique portion of the total waste stream that is determined by its particular generation, collection, or composition characteristics. Sectors are identified according to the source, or generator, of the waste (single-family or commercial), as well as how materials are delivered to waste sites (commercially collected or self-hauled).

- **Franchised Commercial and Multi-family Residential (COM)** materials are hauled by contracted or municipally operated vehicles in packer trucks and drop-boxes. At least 80% of the material is generated at institutional, commercial, or industrial buildings such as businesses, schools, government offices, and other institutions, or multifamily residential buildings serviced with dumpsters. This is one of the four sectors of the waste stream collected for this study.
- **Franchised Single-family Residential (RES)** materials are hauled by contracted or municipally operated vehicles in packer trucks. At least 80% of the material is generated at residential buildings serviced with carts. This is one of the four sectors of the waste stream collected for this study.
- **Mixed Waste (MIX)** is commingled material either hauled in transfer trailers by contracted or municipally operated vehicles from a transfer station, or as loads of material recovery facility (MRF) residuals. This stream does not include loads from community drop-off locations. These loads do not come directly from a collection route or property; therefore, the generating sector is often unidentifiable. This is one of the four sectors of the waste stream collected for this study.
- **Self-haul (SH)** materials are hauled by vehicles not operated by a franchise or municipality, including waste from residential or nonresidential sources. Self-haul customers do not have a permit to operate as waste haulers. Municipal haulers, such as city road crews and parks departments, bringing waste from cleanups, are also included in this stream. This is one of the four sectors of the waste stream collected for this study.

Sort: For this study, material sent to landfills for disposal was categorized based on the study sorting list. Each of the 83 sorting categories included only one of the following: (1) covered material (i.e., single-use packaging and single-use plastic food service ware covered under the Act); (2) potentially reusable alternatives to covered material (e.g.,

reusable milk jug); or (3) all other material not covered under the Act, classified as Remainder/Composite. Sorting was conducted by contractor staff. Materials in the Remainder/Composite categories were subject to additional quality control sorting by CalRecycle staff.

Material Sorting List: The list of material categories used by contractor staff to conduct the study. It was aligned with covered material categories.

Abbreviations and Acronyms

ADC – Alternative Daily Cover

CalRecycle – California Department of Resources Recycling and Recovery

C&D – Construction and demolition

CMC – Covered Material Category

COM – Franchised Commercial and Multi-Family Residential

EPR – Extended Producer Responsibility

HDPE – High-Density Polyethylene

HHW – Household Hazardous Waste

Lbs. - Pounds

LDPE – Low-Density Polyethylene

MIX – Mixed Waste

MRF – Material Recovery Facility

OCC – Old Corrugated Containers or Cardboard

PET – Polyethylene Terephthalate

PP – Polypropylene

PRC – Public Resources Code

PS – Polystyrene

PVC – Polyvinyl Chloride

RDRS – Recycling and Disposal Reporting System

RES – Franchised Single-Family Residential

SB – California State Senate Bill

SH – Self-Haul

SWIS – CalRecycle's Solid Waste Information System

The Act - Senate Bill 54 (SB 54), the Plastic Pollution Prevention and Packaging Producer Responsibility Act (Allen, Chapter 75, Statutes of 2022)

Bibliography

1. California Department of Resources Recycling and Recovery. (2025). Recycling and Disposal Reporting System (RDRS) Report 8: Statewide Totals for Disposal and Disposal-Related Materials. Retrieved May 2025, from <https://www2.calrecycle.ca.gov/RecyclingDisposalReporting/Reports/StatewideTotalDisposalMaterials>



Funding for Illegally Dumped Mattress Pilot Study

Deadline: Nov. 14, 2025

Posted: Oct. 6, 2025

Category: Pilot project

The Mattress Recycling Council is soliciting applications for pilot study projects aimed at preventing or eradicating the illegal dumping of mattresses in impacted California communities.

MRC intends to award funding to project(s) that will:



concerning illegal dumping of mattresses

- Expand access to convenient and affordable mattress collection programs
- Remediate and beautify known illegal dump sites

The RFP provides specific information on what can be funded and examples of eligible project ideas.

The maximum amount available for funding in 2026 is \$64,000.

Applications are due on Friday, Nov. 14, 2025, by 5 p.m. PST

All projects must be completed by Dec. 31, 2026.

Other important dates:

- Oct. 20 – Any questions concerning the RFP are to be submitted
- Oct. 29 – Webinar to discuss the RFP at 10 a.m. Register for the webinar.

- **Request for Proposals - 2026 Illegal Dumping Pilot Study**
- **Application for 2026 Illegal Dumping Pilot Study**
- **2026 Illegal Dumping Pilot Study - Webinar Registration**



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Mission

Mattress Recycling Council contributes to a sustainable future by developing and implementing innovative mattress recycling solutions.

Vision

Mattress Recycling Council envisions a future in which mattress recycling is universal and economically viable.

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Circular CRV Association

1005 12th Street, Lower 1
Sacramento, CA 95814

October 1, 2025

Karen Kayfetz
Branch Chief, Product Stewardship Branch
CalRecycle
1001 I Street
Sacramento, CA 95814

Subject: Stewardship Plan Changes and Notification – October 2025

Dear Karen Kayfetz,

Please see the changes Circular CRV Association will make to its 'Dealer Cooperative Stewardship Plan in November 2025, as well as the changes made to the Plan for October 2025, summarized below.

Regulatory Corrections

Pursuant to 14 CCR Section 2378(a), effective October 1, 2025, the changes outlined below to Circular CRV Association's Dealer Cooperative Stewardship Plan will be made:



Circular CRV Association

1005 12th Street, Lower 1
Sacramento, CA 95814

Part I – Section 6: Dealer Members

- The first paragraph of Section 6 of Circular CRV Association's Dealer Cooperative Stewardship Plan will be amended to reflect *216 Dealer Members*.
- Exhibit C of Circular CRV Association's Dealer Cooperative Stewardship Plan will be amended to include the Dealer Members listed below.

Dealer (Store) Name	Dealer Registration Number	Dealer Street Address	City	State	ZIP	Convenience Zone Status
<i>Holiday Market</i>	<i>DR91720.001</i>	<i>9350 Deschutes Rd</i>	<i>Palo Cedro</i>	<i>CA</i>	<i>96073</i>	<i>Unserved</i>

Part I – Section 6: Dealer Members

- Exhibit C of Circular CRV Association's Dealer Cooperative Stewardship Plan will be amended to remove the Dealer Members listed below.

Dealer (Store) Name	Dealer Registration Number	Dealer Street Address	City	State	ZIP	Convenience Zone Status
<i>Whole Foods</i>	<i>DR90365.001</i>	<i>911 Soquel Ave</i>	<i>Santa Cruz</i>	<i>CA</i>	<i>95062</i>	<i>Served</i>
<i>Whole Foods</i>	<i>DR104616.001</i>	<i>1710 41st Ave</i>	<i>Capitola</i>	<i>CA</i>	<i>95010</i>	<i>Served</i>
<i>Trader Joe's</i>	<i>DR86852.0001</i>	<i>3250 Lakeshore Ave</i>	<i>Oakland</i>	<i>CA</i>	<i>94610</i>	<i>Served</i>
<i>Whole Foods</i>	<i>DR112985.001</i>	<i>4800 El Camino Real</i>	<i>Los Altos</i>	<i>CA</i>	<i>94022</i>	<i>Served</i>
<i>Trader Joes</i>	<i>DR107687.001</i>	<i>590 Showers Dr</i>	<i>Mountain View</i>	<i>CA</i>	<i>94040</i>	<i>Served</i>
<i>Trader Joe's</i>	<i>DR99493.001</i>	<i>3555 Clares Street #D</i>	<i>Capitola</i>	<i>CA</i>	<i>95010</i>	<i>Served</i>
<i>Whole Foods</i>	<i>DR137317.001</i>	<i>1140 Blossom Hill Rd</i>	<i>San Jose</i>	<i>CA</i>	<i>95118</i>	<i>Served</i>
<i>Trader Joe's</i>	<i>DR112557.001</i>	<i>5353 Almaden Expressway #J-37</i>	<i>San Jose</i>	<i>CA</i>	<i>95118</i>	<i>Served</i>
<i>Glen Ellen Village Market</i>	<i>DR3330.001</i>	<i>13751 Arnold Dr</i>	<i>Glen Ellen</i>	<i>CA</i>	<i>95442</i>	<i>Unserved</i>
<i>Walmart</i>	<i>DR193142.001</i>	<i>3112 Santa Rita Road</i>	<i>Pleasanton</i>	<i>CA</i>	<i>94566</i>	<i>Served</i>
<i>Cardenas Market</i>	<i>DR89532.001</i>	<i>31655 Date Palm Dr</i>	<i>Cathedral City</i>	<i>CA</i>	<i>92234</i>	<i>Served</i>



Part I – Section 7: Unserved Convenience Zones

- Exhibit D of Circular CRV Association’s Dealer Cooperative Stewardship Plan will be amended to include the Redemption Sites in Unserved Convenience Zones listed below.

Dealer (Store) Name	Dealer Convenience Zone Number	Dealer Street Address	City	State	ZIP
<i>Holiday Market</i>	<i>12584</i>	<i>9350 Deschutes Rd</i>	<i>Palo Cedro</i>	<i>CA</i>	<i>96073</i>

Part I – Section 7: Redemption Sites in Unserved Convenience Zones

- Exhibit D of Circular CRV Association’s Dealer Cooperative Stewardship Plan will be amended to remove the Redemption Sites in Unserved Convenience Zones listed below.

Dealer (Store) Name	Dealer Convenience Zone Number	Dealer Street Address	City	State	ZIP
<i>Whole Foods</i>	<i>13082</i>	<i>911 Soquel Ave</i>	<i>Santa Cruz</i>	<i>CA</i>	<i>95062</i>
<i>Whole Foods</i>	<i>11487</i>	<i>1710 41st Ave</i>	<i>Capitola</i>	<i>CA</i>	<i>95010</i>
<i>Whole Foods</i>	<i>11416</i>	<i>4800 El Camino Real</i>	<i>Los Altos</i>	<i>CA</i>	<i>94022</i>
<i>Whole Foods</i>	<i>15754</i>	<i>1140 Blossom Hill Rd</i>	<i>San Jose</i>	<i>CA</i>	<i>95118</i>
<i>Glen Ellen Village Market</i>	<i>12320</i>	<i>13751 Arnold Dr</i>	<i>Glen Ellen</i>	<i>CA</i>	<i>95442</i>
<i>Cardenas Markets</i>	<i>12868</i>	<i>31655 Date Palm Dr</i>	<i>Cathedral City</i>	<i>CA</i>	<i>92234</i>



Circular CRV Association

1005 12th Street, Lower 1
Sacramento, CA 95814

Part I – Section 9: Redemption Sites

- Exhibit G of Circular CRV Association's Dealer Cooperative Stewardship Plan will be amended to include the Dealer Cooperative Redemption Sites listed below.

Dealer (Store) Name	Location's Convenience Zone Number	Dealer Registration Number	Dealer Street Address	City	State	ZIP
<i>Holiday Market</i>	<i>12584</i>	<i>DR91720.001</i>	<i>9350 Deschutes Rd</i>	<i>Palo Cedro</i>	<i>CA</i>	<i>96073</i>

Part I – Section 9: Redemption Sites

- Exhibit G of Circular CRV Association's Dealer Cooperative Stewardship Plan will be amended to remove the Dealer Cooperative Redemption Sites listed below.

Dealer (Store) Name	Dealer Convenience Zone Number	Dealer Registration Number	Dealer Street Address	City	State	ZIP
<i>Whole Foods</i>	<i>13082</i>	<i>DR90365.001</i>	<i>911 Soquel Ave</i>	<i>Santa Cruz</i>	<i>CA</i>	<i>95062</i>
<i>Whole Foods</i>	<i>11487</i>	<i>DR104616.001</i>	<i>1710 41ST Ave</i>	<i>Capitola</i>	<i>CA</i>	<i>95010</i>
<i>Whole Foods</i>	<i>11416</i>	<i>DR112985.001</i>	<i>4800 El Camino Real</i>	<i>Los Altos</i>	<i>CA</i>	<i>94022</i>
<i>Whole Foods</i>	<i>15754</i>	<i>DR137317.001</i>	<i>1140 Blossom Hill Rd</i>	<i>San Jose</i>	<i>CA</i>	<i>95118</i>
<i>Glen Ellen Village Market</i>	<i>12320</i>	<i>DR3330.001</i>	<i>13751 Arnold Dr</i>	<i>Glen Ellen</i>	<i>CA</i>	<i>95442</i>
<i>Cardenas Markets</i>	<i>12868</i>	<i>DR89532.001</i>	<i>31655 Date Palm Dr</i>	<i>Cathedral City</i>	<i>CA</i>	<i>92234</i>



Circular CRV Association

1005 12th Street, Lower 1
Sacramento, CA 95814

Exhibit E: Dealer Cooperative Redemption Contractors

- The redemption contractors listed below have been added to the Dealer Cooperative's list of Redemption Contractors. Exhibit E has been updated in Circular CRV Association's Dealer Cooperative Stewardship Plan.

RC Identification	Redemption Contractor	Facility Address	Facility City	State	ZIP
<i>RC397236.001</i>	<i>Sunset Recycling Center</i>	<i>30023 Date Palm Dr</i>	<i>Cathedral City</i>	<i>CA</i>	<i>92234</i>
<i>RC398872.001</i>	<i>Sunset Recycling Center</i>	<i>399 Lewelling Blvd</i>	<i>San Leandro</i>	<i>CA</i>	<i>94579</i>

Respectfully,

Brian Phillips

Brian Phillips
Executive Director

Title 17. California Air Resources Board

Notice of Public Hearing to Consider Proposed Amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills

The California Air Resources Board (CARB or Board) will conduct a public hearing at the date and time noted below to consider approving for adoption the proposed amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills (the Landfill Methane Regulation, LMR, or Regulation).

Date: November 20, 2025

Time: 9:00 A.M.

In-Person Location:

California Air Resources Board
Byron Sher Auditorium
1001 I Street, Sacramento, California 95814

Remote Option:

Zoom

This public meeting may continue at 9:00 a.m., on November 21, 2025. Please consult the public agenda, which will be posted ten days before the November 20, 2025, Board Meeting, for important details, including the day on which this item will be considered and how the public can participate via Zoom if they choose to be remote.

Written Comment Period and Submittal of Comments

In accordance with the Administrative Procedure Act, interested members of the public may present comments orally or in writing during the hearing and may provide comments by postal mail or by electronic submittal before the hearing. The public comment period for this regulatory action will begin on September 26, 2025. Written comments not submitted during the hearing must be submitted on or after September 26, 2025, and received **no later than November 10, 2025**. Comments submitted outside that comment period are considered untimely. CARB may, but is not required to, respond to untimely comments, including those raising significant environmental issues. The Board also encourages members of the public to bring to the attention of staff in advance of the hearing any suggestions for modification of the proposed regulatory action. Comments submitted in advance of the hearing must be addressed to one of the following:

Postal mail: Clerks' Office, California Air Resources Board
1001 I Street, Sacramento, California 95814

Electronic submittal: <https://ww2.arb.ca.gov/lispub/comm/bclist.php>

Please note that under the California Public Records Act (Government Code section 7920.000 et seq.), your written and oral comments, attachments, and associated contact information (e.g., your address, phone, email, etc.) become part of the public record and can be released to the public upon request.

Additionally, the Board requests but does not require that persons who submit written comments to the Board reference the title of the proposal in their comments to facilitate review.

Authority and Reference

This regulatory action is proposed under the authority granted in California Health and Safety Code, sections 38501, 38510, 38560, 38560.5, 38580, 39600, and 39601. This action is proposed to implement, interpret, and make specific sections 38501, 38505, 38510, 38550, 38551, 38560, 38560.5, 38562.2, 38566, 38580, 39003, 39500, 39600, 39601, and 39730.5 of the California Health and Safety Code.

Informative Digest of Proposed Action and Policy Statement Overview (Gov. Code, § 11346.5, subd. (a)(3))

Sections Affected:

Proposed amendments to California Code of Regulations, title 17, division 3, chapter 1, subchapter 10, article 4, subarticle 13, sections 95462, 95463, 95464, 95465, 95467, 95468, 95469, 95470, 95471, 95475, and Appendix I. Proposed repeal of California Code of Regulations, title 17, division 3, chapter 1, subchapter 10, article 4, subarticle 13, section 95466.

Documents Incorporated by Reference (Cal. Code Regs., tit. 1, § 20, subd. (c)(3)):

The following documents would be incorporated in the regulation by reference:

- ASTM International, 2025. D2487-17: Standard Practice for Classification of Soils for Engineering Purposes (Unified Soil Classification System). Reapproved February 1, 2025. Copyrighted. **Section 95471(k).**
- Title 14, California Code of Regulations, Division 7, Chapter 9, Article 9.2, Section 18810.2 – Scales and Weighing Requirements at a Landfill. Effective January 1, 2006. **Section 95470(b)(6)(B)1.**
- Title 27, California Code of Regulations, Division 2, Subdivision 1, Chapter 3, Subchapter 4 – Criteria for Landfills and Disposal Sites. As it existed on July 18, 2025. **Section 95471(k).**
- Title 27, California Code of Regulations, Division 2, Subdivision 1, Chapter 3, Subchapter 5 – Closure and Post-Closure Maintenance. As it existed on July 18, 2025. **Section 95471(k).**
- Title 40, Code of Federal Regulations, Part 60, Appendix A-1 – Test Methods 1 through 2F. Effective May 30, 2023. **Sections 95471(a), (f)(1), and (m).**

- Title 40, Code of Federal Regulations, Part 60, Appendix A-2 – Test Methods 2G through 3C. Effective October 31, 2016. **Sections 95471(n)(2) and (3).**
- Title 40, Code of Federal Regulations, Part 60, Appendix A-4 – Test Methods 6 through 10B. Effective May 30, 2023. **Sections 95471(o)(4)(A) and (B).**
- Title 40, Code of Federal Regulations, Part 60, Appendix A-6 – Test Methods 16 through 18. Effective December 7, 2020. **Sections 95471(i)(1) and (n)(2).**
- Title 40, Code of Federal Regulations, Part 60, Appendix A-7 – Test Methods 19 through 25E. Effective May 30, 2023. **Section 95471(i)(1).**
- Title 40, Code of Federal Regulations, Part 62 – Approval and Promulgation of State Plans for Designated Facilities and Pollutants, section 62.16722(a)(2). Effective June 21, 2021. **Section 95471(n)(1).**

Background and Effect of the Proposed Regulatory Action:

Background on the Landfill Methane Regulation

Municipal solid waste (MSW) landfills are the second-largest source of methane emissions in California, contributing over 20% of statewide methane emissions.¹ Methane is a powerful greenhouse gas, particularly over the short-term, that scientists estimate is responsible for up to 25% of climate change.² In addition, co-pollutants in landfill gas are emitted alongside methane that can have potential air quality and health implications for those who live or work nearby.

Adopted in 2010 as a discrete early action measure under California's 2006 landmark greenhouse gas emissions mitigation law, Assembly Bill 32,³ the Landfill Methane Regulation is designed to reduce methane emissions from MSW landfills. The LMR requires owners and operators to install and optimally operate landfill gas collection and control systems (GCCS) to minimize emissions, monitor surface methane concentration and other performance parameters, repair emission exceedances and other performance issues, conduct source testing of combustion devices used to destroy methane, keep records of these actions and data, and report compliance information to CARB and local air districts.

Currently, 190 landfills are subject to the LMR, with 153 landfills required to operate a GCCS. Both private companies and government entities (e.g., counties and cities) own and operate landfills. The LMR is implemented by CARB and local air districts, 22 of which have agreements with CARB to primarily implement and enforce the Regulation in their districts.

Effects of the Proposed Amendments

The proposed amendments are designed to improve methane control at MSW landfills by leveraging technologies, research, and lessons learned through over a decade of

¹ CARB. (2024, September 20). *Assembly Bill 32 Greenhouse Gas Emissions Inventory for 2000-2022 — by Sector and Activity (Methane)*.

² CARB. (2022, December). *2022 Scoping Plan for Achieving Carbon Neutrality*.
<https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>.

³ Health & Saf. Code 38500 et seq., Assembly Bill 32 (Nuñez, Chapter 488, Statutes of 2006).

implementation experience. The following is a summary of CARB staff's proposal to amend the LMR organized into three overarching categories:

Methane emissions monitoring and repair actions:

- Require inspection and repair when operators are notified of a remotely-detected methane emission plume;
- Increase the stringency of landfill surface and component leak monitoring procedures, including increasing coverage by removing exemptions from monitoring, reducing corrective action timelines, and increasing frequency at certain landfills; and
- Establish a process to evaluate and approve emerging alternative technologies for leak detection, and require tools such as handheld or drone-mounted laser scanners to identify leaks in inaccessible areas that are currently excluded from monitoring.

Improving GCCS operations:

- Require earlier installation and operation of gas collection infrastructure in areas of new waste deposition;
- Limit periods of GCCS downtime and mitigate emissions from unavoidable downtime;
- Expand wellhead monitoring parameters and analysis, and require response actions for out-of-range values or large changes in values;
- Require more frequent monitoring, analysis, and mitigation measures including cover improvement in areas with persistent leaks or other issues; and
- Better manage declining gas generation at closed landfills through clearer standards for requests and approvals to operate a GCCS semi-continuously or shut down a GCCS.

Clarifying regulatory applicability, standardizing reporting, and other miscellaneous changes:

- Clarify responsibilities of third-party gas control system owners and operators;
- Reduce barriers to using continuous wellhead monitoring technologies by defining how regulatory thresholds apply to that data;
- Standardize, streamline, and digitize reporting to support compliance monitoring; and
- Miscellaneous clarifications, updates, and improvements to processes and enforceability.

CARB may also consider other changes to the sections affected, as listed on page three of this notice, or other sections within the scope of this notice, during the course of this rulemaking process.

Objectives and Benefits of the Proposed Regulatory Action:

Over a decade of LMR implementation, supported by extensive research including the California Methane Survey⁴ and airborne plume-mapping campaigns,⁵ has indicated opportunities to improve the LMR's effectiveness, stringency, and enforceability. The proposed

⁴ Duren, R. M., Thorpe, A.K., Foster, K.T., Rafiq, T., Hopkins, F.M., Yadav, V., ... & Miller, C.E. (2019). California's Methane Super-Emitters. *Nature*, (575), 180–184. <https://doi.org/10.1038/s41586-019-1720-3>.

⁵ CARB. (2024b, April). *Summary Report of the 2020, 2021, and 2023 Airborne Methane Plume Mapping Studies*. https://ww2.arb.ca.gov/sites/default/files/2024-04/2020-2021-2023%20Airborne%20Summary%20Report_FINAL.pdf.

amendments aim to leverage new technologies and lessons learned to drive further methane emissions reductions in support of the State's ambitious methane emissions reduction goals. These goals include, among others, reducing methane emissions 40% below 2013 levels by 2030⁶ and achieving carbon neutrality by 2045 or sooner.⁷ Specifically, key objectives include integration of advanced technologies; improved detection of leaks from both the landfill surface and GCCS components; reduced GCCS downtime; reduced emissions from the working face and areas of new waste deposition; better monitoring and operation of the GCCS to prevent disruptions, failures, odors, and co-pollutant emissions; improved management of landfills with declining gas generation; and improved clarity, processes, enforceability, and regulatory oversight.

The proposed amendments are expected to reduce emissions of methane and co-pollutants like toxic air contaminants, volatile organic compounds, and odorous compounds. Methane emission reductions reduce the impacts of global climate change that affect Californians as well as the global population. Co-pollutant and odor reductions can improve air quality on and around the landfill, benefiting the health of workers and residents of nearby communities. Additional wellhead monitoring may also lead to earlier detection and prevention of subsurface elevated temperature events that can damage the GCCS and increase emissions. The proposed amendments also contain significant improvements to reporting that will allow CARB and local air districts to better oversee compliance and improve public transparency.

Staff estimate expected methane emission reductions from increased gas capture of approximately 17,000 metric tons of methane per year. Staff expect that the proposed amendments will also result in additional unquantified emission reductions due to surface cover improvements. The quantified portion of the emission reductions would provide avoided social costs of methane in the range of \$56 million to \$178 million over a three-year analysis period.

Comparable Federal Regulations:

MSW landfills are regulated under federal rules including the New Source Performance Standards (NSPS)⁸ and National Emission Standards for Hazardous Air Pollutants (NESHAP).⁹ The NSPS applies to new, modified, or reconstructed MSW landfills that commence construction, reconstruction, or modification after July 17, 2014. The NESHAP applies to facilities meeting various applicability criteria related to the amount of hazardous air pollutants emitted from the facility (i.e., a "major source" or "collocated with a major source"), the landfill's design capacity and uncontrolled non-methane organic compound emissions, and whether the landfill is a bioreactor. Additionally, there are federal Emission Guidelines (EG)¹⁰ that apply to "existing" landfills (not new, modified, or reconstructed after July 17, 2024) that states are required to implement through state plans consisting of rules, regulations, or other

⁶ Health & Saf. Code § 39730.5, Senate Bill 1383 (Lara, Chapter 395, Statutes of 2016).

⁷ Health & Saf. Code § 38562.2, Assembly Bill 1279 (Muratsuchi, Chapter 337, Statutes of 2022).

⁸ 40 C.F.R., Part 60, Subpart XXX.

⁹ 40 C.F.R., Part 63, Subpart AAAA.

¹⁰ 40 C.F.R., Part 60, Subpart Cf.

requirements. The current Regulation primarily implements the EG as California's State Plan,¹¹ with some additional requirements related to wellhead monitoring being implemented by a federal plan.¹²

The proposed amendments differ from the federal regulations in that they apply to smaller and older¹³ landfills (the same applicability as the current LMR) and set more stringent requirements for landfill gas collection and control, component leak testing, and surface emissions monitoring. Inclusion of smaller landfills and older landfills, and more stringent control requirements, are necessary to maximize greenhouse gas emission reductions to contribute toward achieving the methane and greenhouse emission reduction targets in state law (Health and Safety Code sections 38562.2, 38566, and 39730.5).

California has authority to set its own standards to reduce emissions further to meet federal and state ambient air quality standards and climate change requirements and goals, and to require additional and separate reporting. The differing requirements in the proposed amendments are necessary to achieve additional benefits for human health, public welfare, and the environment as envisioned by authorizing legislation.

An Evaluation of Inconsistency or Incompatibility with Existing State Regulations (Gov. Code, § 11346.5, subd. (a)(3)(D)):

During the process of developing the proposed regulatory action, CARB conducted a search of any similar regulations on this topic and concluded these regulations are neither inconsistent nor incompatible with existing state regulations.

Disclosure Regarding the Proposed Regulation

Fiscal Impact/Local Mandate Determination Regarding the Proposed Action (Gov. Code, § 11346.5, subds. (a)(5)&(6)):

The determinations of the Board's Executive Officer concerning the costs or savings incurred by public agencies and private persons and businesses in reasonable compliance with the proposed regulatory action are presented below.

Under Government Code sections 11346.5, subdivision (a)(5) and 11346.5, subdivision (a)(6), the Executive Officer has determined that the proposed regulatory action would create costs or savings to any State agency, would not create costs or savings in federal funding to the State, would create costs or mandate to any local agency or school district, whether or not reimbursable by the State under Government Code, title 2, division 4, part 7 (commencing with section 17500), or other nondiscretionary cost or savings to State or local agencies.

¹¹ CARB. (2017, May 25). *California State Plan for Municipal Solid Waste Landfills Under Clean Air Act Section 111(d)*. https://ww2.arb.ca.gov/sites/default/files/2020-08/CaStatePlan_final.pdf.

¹² See 40 C.F.R., § 62.1115(b)(2); Partial Approval, Partial Disapproval and Promulgation of State Plans for Designated Facilities and Pollutants; California; Control of Emissions from Existing Municipal Solid Waste Landfills, 84 Fed. Reg. 36863 (July 30, 2019).

¹³ The date after which the landfill must have accepted waste to be subject the regulations/rules.

Cost to any Local Agency or School District Requiring Reimbursement under Gov. Code section 17500 et seq.:

Pursuant to Government Code sections 11346.5, subdivision (a)(5) and 11346.5, subdivision (a)(6), the proposed amendments constitute a mandate that would create costs and cost-savings to local agencies. However, these costs to local agencies are not reimbursable by the state under Government Code, title 2, division 4, part 7 (commencing with section 17500). The mandate is not reimbursable because this action neither compels local agencies to provide new governmental functions (i.e., it does not require such agencies to provide new or additional governmental services to the public), nor imposes requirements that apply only to local agencies or school districts. Rather, the requirements apply generally to all entities that own or operate landfills or equipment for the collection or control of landfill gas. Therefore, the regulation does not constitute a "Program" imposing any unique requirements on local agencies or school districts as set forth in Government Code section 17514. Additionally, the affected local government-owned landfills are operated as not-for-profit organizations and are able to recover compliance costs by increasing service fees.

Cost or Savings for State Agencies:

The proposed amendments will have a fiscal impact on state government entities that own or operate landfills in the form of direct compliance costs. Staff determined that there are two such landfills, which together comprise an estimated 226 acres of the total 15,000 acres of surface area of controlled government-owned landfills subject to the LMR (approximately 1.5%). Staff applied this percentage to the estimated total costs to government-owned landfills for provisions that could apply to closed landfills to estimate that the State would incur direct compliance costs of approximately \$125,000 over a three-year analysis period.¹⁴ Staff also estimate that the proposed amendments will generate increased state sales tax revenues of approximately \$106,000 per year based on the sale of additional materials and parts for new gas collectors.

Other Non-Discretionary Costs or Savings on Local Agencies:

The proposed amendments will have a fiscal impact on local agencies that own or operate landfills, such as cities and counties, in the form of direct compliance costs. Based on the total costs to all government landfills less the costs to state-owned and military-owned landfills, staff estimate that local government entities would incur direct compliance costs of \$6.2 million in the first year and \$6.1 million annually thereafter for total costs of \$18.3 million over the three-year economic analysis timeframe.

Local air districts can voluntarily enter into memoranda of understanding (MOU) with CARB to primarily implement and enforce the LMR in their districts; currently, 22 local air districts have MOUs with CARB. Staff estimated labor time requirements for various activities that implementing air districts would be likely to incur and multiplied this by an estimated labor cost rate to arrive at total statewide costs for these activities. This resulted in estimated air district costs (statewide) of \$417,594 over three years. Staff expect that the districts will fully recover their costs from the landfill owners or operators under the authority granted to

¹⁴ See Initial Statement of Reasons (ISOR) Appendix B for detailed calculations.

them in sections 40702, 40727.2(j), and 41512 of the California Health and Safety Code. In addition, section 95473 of the Regulation requires the landfill owners or operators to pay any fees assessed by a local air district for the purpose of recovering district-incurrent implementation and enforcement costs.

Staff also estimate that the proposed amendments will generate increased local sales tax revenues of approximately \$131,000 per year based on the sale of additional materials and parts for new gas collectors.

Cost or Savings in Federal Funding to the State:

No costs or savings in federal funding is anticipated as a result of the proposed amendments.

Housing Costs (Gov. Code, § 11346.5, subd. (a)(12)):

The Executive Officer has also made the initial determination that the proposed regulatory action will not have a significant effect on housing costs.

Significant Statewide Adverse Economic Impact Directly Affecting Business, Including Ability to Compete (Gov. Code, §§ 11346.3, subd. (a), 11346.5, subd. (a)(7), 11346.5, subd. (a)(8)):

The Executive Officer has made an initial determination that the proposed regulatory action would not have a significant statewide adverse economic impact directly affecting businesses, including the ability of California businesses to compete with businesses in other states, or on representative private persons.

Results of The Economic Impact Analysis/Assessment (Gov. Code, § 11346.5, subd. (a)(10)):

A detailed assessment of the economic impacts of the proposed regulatory action can be found in Chapter VIII of the Initial Statement of Reasons (ISOR).

Non-Major Regulation: Statement of the Results of the Economic Impact Assessment (EIA):

The creation or elimination of jobs within the State of California.

The proposed amendments are not anticipated to directly result in job creation or elimination. However, the proposed amendments may indirectly affect job creation because they will result in additional surface emissions monitoring, leak detection, repairs, and gas collector/well installation (usually performed by outside contractors). There is also the potential of less labor being needed for monitoring at landfills that adopt certain alternative monitoring technologies (e.g., drones). Staff estimate that increases in labor time needs would outweigh any decreases.

The creation of new business or the elimination of existing businesses within the State of California.

The creation or elimination of businesses in the directly regulated sector are not anticipated. Most of the additional costs imposed by the proposed amendments are related to increased monitoring, remediation, and gas collector/well installation and are expected to be relatively modest compared to the level of those activities already occurring. Therefore, staff expect that most of this activity will be absorbed by existing landfill staff and contractors. Potentially, the proposed amendments could drive a demand in ancillary sectors providing monitoring technology and services, well installation, control device testing, and other similar services.

The expansion of businesses currently doing business within the State of California.

The expansion of current businesses in the directly regulated sector is not anticipated for the same reasons that creation or elimination of existing businesses are not expected. Potentially, the proposed amendments could drive a demand in ancillary sectors providing monitoring technology and services, well installation, control device testing, and other similar services.

The benefits of the regulation to the health and welfare of California residents, worker safety, and the state's environment.

The proposed amendments are expected to reduce emissions of methane through improved capture of landfill gas by collection and control systems and through additional mechanisms from improvements to landfill surface cover. The same measures that reduce methane emissions also reduce emissions of co-pollutants in the landfill gas including volatile organic compounds and toxic air contaminants. Changes to the structure and contents of reporting will provide CARB with valuable additional data for understanding sources of emissions and evaluating regulatory compliance in a format that will enable more rapid and comprehensive review. Together, the benefits of the proposed amendments comprise reduced impacts of global climate change, improved air quality, reduced odors, and improved capabilities for regulator oversight. The proposed amendments are not expected to impact worker safety other than general air quality benefits from reduced co-pollutant emissions.

Effect on Jobs/Businesses.

The Executive Officer has determined that the proposed regulatory action would not affect the creation or elimination of jobs within the State of California, the creation of new businesses or elimination of existing businesses within the State of California, or the expansion of businesses currently doing business within the State of California. A detailed assessment of the economic impacts of the proposed regulatory action can be found in the Economic Impact Analysis in the ISOR.

Benefits of the Proposed Regulation.

The objective of the proposed regulatory action is to reduce methane emissions from landfills through improved collection and control of landfill gas and improvements to landfill surface cover. This provides benefits including reduced impacts of global climate change and improvements to local air quality through reduced co-pollutant emissions.

A summary of these benefits is provided, please refer to “Objectives and Benefits”, under the Informative Digest of Proposed Action and Policy Statement Overview Pursuant to Government Code section 11346.5, subdivision (a)(3) discussion on page 5.

Business Report (Gov. Code, §§ 11346.5, subd. (a)(11); 11346.3, subd. (d)):

In accordance with Government Code sections 11346.5, subdivisions (a)(11) and 11346.3, subdivision (d), the Executive Officer finds the reporting requirements of the proposed regulatory action which apply to businesses are necessary for the health, safety, and welfare of the people of the State of California.

Cost Impacts on Representative Private Persons or Businesses (Gov. Code, § 11346.5, subd. (a)(9)):

In developing this regulatory proposal, CARB staff evaluated the potential economic impacts on representative private persons or businesses. The total direct costs of the proposed amendments to private businesses are estimated to be \$6.3 million in the first year and \$6.2 million annually thereafter for total costs of \$18.7 million over three years (the timeframe used for the economic analysis). The total direct costs to regulated entities in the private and government sectors are shown in the ISOR Chapter VIII and detailed cost calculations are provided in the ISOR Appendix B.

The proposed amendments would not result in any direct costs to individuals. However, compliance costs could potentially be passed to individuals through higher fees charged by landfills for waste disposal services. To the extent that costs may be passed on to individuals, staff expect any increases to be very small for each individual (e.g., the proposed amendments are estimated to cost approximately \$0.31 per capita per year ongoing).

Effect on Small Business (Cal. Code Regs., tit. 1, § 4, subds. (a) and (b)):

The Executive Officer has also determined under California Code of Regulations, title 1, section 4, that the proposed regulatory action would not affect small businesses because the regulation exempts any landfills that may be considered small businesses. Specifically, closed landfills with less than 450,000 tons of waste-in-place are exempt from the LMR.

Consideration of Alternatives (Gov. Code, § 11346.5, subd. (a)(13)):

Before taking final action on the proposed regulatory action, the Board must determine that no reasonable alternative considered by the Board, or that has otherwise been identified and brought to the attention of the Board, would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law. Staff

considered two alternatives to the proposed amendments as described in Chapter IX of the ISOR and determined that no alternative considered would be more effective in carrying out the purpose of which the action is proposed.

Environmental Analysis

CARB, as the lead agency for the proposed amendments, has concluded that this action is categorically exempt from the California Environmental Quality Act (CEQA) under the “Class 1” exemption (Cal. Code Regs., tit. 14, § 15301) for modifications to existing facilities, “Class 2” exemption (Cal. Code Regs., tit. 14, § 15302) for replacement or reconstruction of existing structures or facilities, “Class 3” exemption (Cal. Code Regs., tit. 14, § 15303) for new construction or conversion of small structures, “Class 4” exemption (Cal. Code Regs., tit. 14, § 15304) for minor alterations to land, and “Class 8” exemption (Cal. Code Regs., tit. 14, § 15308) for actions taken by regulatory agencies for the protection of the environment. A brief explanation of the basis for reaching this conclusion is included in Chapter VI of the ISOR.

Special Accommodation Request

Consistent with California Government Code section 7296.2, special accommodation or language needs may be provided for any of the following:

- An interpreter to be available at the hearing;
- Documents made available in an alternate format or another language; and
- A disability-related reasonable accommodation.

To request these special accommodations or language needs, please contact the Clerks’ Office at cotb@arb.ca.gov or (916) 322-5594 as soon as possible, but no later than ten business days before the scheduled Board hearing. TTY/TDD/Speech to Speech users may dial 711 for the California Relay Service.

Consecuente con la sección 7296.2 del Código de Gobierno de California, una acomodación especial o necesidades lingüísticas pueden ser suministradas para cualquiera de los siguientes:

- Un intérprete que esté disponible en la audiencia;
- Documentos disponibles en un formato alterno u otro idioma; y
- Una acomodación razonable relacionados con una incapacidad.

Para solicitar estas comodidades especiales o necesidades de otro idioma, por favor llame a la oficina del Consejo al cotb@arb.ca.gov o (916) 322-5594 lo más pronto posible, pero no menos de 10 días de trabajo antes del día programado para la audiencia del Consejo. TTY/TDD/Personas que necesiten este servicio pueden marcar el 711 para el Servicio de Retransmisión de Mensajes de California.

Agency Contact Persons

Inquiries concerning the substance of the proposed regulatory action may be directed to the agency representative Quinn Langfitt, Staff Air Pollution Specialist, Short-lived Climate Pollutant Policy Section, at (279) 208-7487 or quinn.langfitt@arb.ca.gov or (designated back-

up contact) Anthy Alexiades, Manager, Short-lived Climate Pollutant Policy Section, at (279) 208-7215 or anthy.alexiaades@arb.ca.gov.

Availability of Documents

CARB staff has prepared a Staff Report: Initial Statement of Reasons (ISOR) for the proposed regulatory action, which includes a summary of the economic and environmental impacts of the proposal. The report is entitled: *Public Hearing to Consider the Proposed Amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills*.

Copies of the ISOR and the full text of the proposed regulatory language, in underline and strikeout format to allow for comparison with the existing regulations may be accessed on CARB's website listed below, on September 23, 2025. Please contact Bobbi Ruch, Regulations Coordinator, at regulations@arb.ca.gov or (279) 208-7881 if you need physical copies of the documents. Pursuant to Government Code section 11346.5, subdivision (b), upon request to the aforementioned Regulations Coordinator, physical copies would be obtained from the Public Information Office, California Air Resources Board, 1001 I Street, Visitors and Environmental Services Center, First Floor, Sacramento, California, 95814.

Further, the agency representative to whom nonsubstantive inquiries concerning the proposed administrative action may be directed is Bobbi Ruch, Regulations Coordinator, (279) 208-7881. The Board staff has compiled a record for this rulemaking action, which includes all the information upon which the proposal is based. This material is available for inspection upon request to the contact persons.

Hearing Procedures

The public hearing will be conducted in accordance with the California Administrative Procedure Act, Government Code, title 2, division 3, part 1, chapter 3.5 (commencing with section 11340).

Following the public hearing, the Board may take action to approve for adoption the regulatory language as originally proposed, or with non-substantial or grammatical modifications. The Board may also approve for adoption the proposed regulatory language with other modifications if the text as modified is sufficiently related to the originally proposed text that the public was adequately placed on notice and that the regulatory language as modified could result from the proposed regulatory action. If this occurs, the full regulatory text, with the modifications clearly indicated, will be made available to the public, for written comment, at least 15-days before final adoption.

The public may request a copy of the modified regulatory text from CARB's Public Information Office, Air Resources Board, 1001 I Street, Visitors and Environmental Services Center, First Floor, Sacramento, California, 95814.

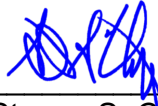
Final Statement of Reasons Availability

Upon its completion, the Final Statement of Reasons (FSOR) will be available and copies may be requested from the agency contact persons in this notice, or may be accessed on CARB's website listed below.

Internet Access

This notice, the ISOR and all subsequent regulatory documents, including the FSOR, when completed, are available on CARB's website for this rulemaking at <https://ww2.arb.ca.gov/rulemaking/2025/landfill-methane-regulation>.

California Air Resources Board



Steven S. Cliff, Ph.D.
Executive Officer

Date: September 9, 2025

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see [CARB's website](https://ww2.arb.ca.gov) (ww2.arb.ca.gov).

Spray Polyurethane Foam Systems with Unreacted Methylene Diphenyl Diisocyanates

Notice of Final Determination, Required Regulatory Responses

On October 6, 2025, DTSC issued a [Notice of Final Determination](#) requiring three regulatory responses to address potential adverse impacts from exposure to unreacted methylene diphenyl diisocyanates (MDI) from Spray Polyurethane Foam Systems (SPF Systems). MDI is a respiratory sensitizer that can lead to asthma and allergic sensitization.

Through these regulatory responses, DTSC aims to protect workers and Do-It-Yourself SPF Systems users, or “applicators.” The regulatory responses require SPF Systems manufacturers to:

- Provide information for SPF Systems applicators about the hazards of the product and specific personal protective equipment (PPE) requirements.
- Invest in a Green Chemistry and Engineering Innovation Fund to advance research and development of safer alternatives to SPF Systems by paying a quarterly fee per pound of SPF Systems sold in CA for a 5-year period.
- Ensure applicators receive safety training before using the product.

The first two regulatory responses are required when a manufacturer completes an Abridged Alternatives Analysis Report and does not select an alternative to the Priority Product. For more information, visit the Regulatory Response [webpage](#).

Monthly Public Meeting

10:00 A.M., August 19, 2025
Cal/EPA Building – Byron Sher Auditorium
Via [Webcast](#)

A. DIRECTOR'S REPORT

Presentations or discussions by the Director and/or Executive Offices regarding department matters, legislative updates, public affairs, or initiatives.

B. POLICY & PROGRAM UPDATE

Announcements/Decisions Posted

1. Approval of Circular CRV Association's Dealer Cooperative Stewardship Plan.
Decision Posted: July 24, 2025.
Department Staff contact: DealerCoops@CalRecycle.ca.gov
[Public Notice](#)
2. Textile Producer Responsibility Organization Application Workshop: September 9, 2025.
Department Staff Contact: Textiles@CalRecycle.ca.gov
[Public Notice](#)

Information Items

1. Plastic Pollution Prevention Act Implementation Update
Department Staff Contact: Packaging@CalRecycle.ca.gov

C. GRANT AND LOAN PROGRAMS

Action Items

1. Eligibility Criteria and Evaluation Process for the Reusable Beverage Containers Infrastructure Grant Program (California Beverage Container Recycling Fund, FY2022-23)
Department Staff Contact: Tiffany.Morris@CalRecycle.ca.gov
[Public Notice](#)
2. Eligibility Criteria and Evaluation Process for the Increased Recycling of Empty Glass Beverage Containers Grant Program (California Beverage Container Recycling Fund, FY2025-26)
Department Staff Contact: Naecole.Washington@CalRecycle.ca.gov
[Public Notice](#)

Information Item

1. Awards for the Local Government Waste Tire Amnesty Grant Program (Tire Recycling Management Account, FY2025-26)
Department Staff Contact: Cathy.Aggergaard@CalRecycle.ca.gov
[Public Notice](#)
2. Awards for the Local Enforcement Agency Grant Program (EA36, FY2025-26)
Department Staff Contact: Andrea.Smith@CalRecycle.ca.gov
[Public Notice](#)

Open Applications:

Beverage Container Redemption Innovation Grant Program (Dealers)

Application Due Date: August 19, 2025 (Revised) (Cycle 2)

Tire Incentive Program

Application Due Date: August 20, 2025 (Cycle 13)

Household Hazardous Waste Grant Program (Construction Cycle)

Application Due Date: August 26, 2025 (Cycle 44)

Household Hazardous Waste Grant Program (Small Projects)

Application Due Date: August 26, 2025 (Cycle 45)

Beverage Container Redemption Innovation Grant Program (Recycling Centers)

Application Due Date: September 2, 2025 (Cycle 3)

Beverage Container Redemption Innovation Grant Program (Qualifying Tribal Entities)

Application Due Date: September 2, 2025 (Cycle 4)

Rubberized Pavement Grant Program

Application Due Date: September 11, 2025 (Cycle 18)

Farm and Ranch Solid Waste Cleanup and Abatement Grant

Application Due Date: October 7, 2025 (Cycle 88)

Tire-Derived Aggregate Grant Program

Application Due Date: October 16, 2025 (Cycle 26)

Beverage Container Redemption Innovation Grant Program (Dealer Cooperatives)

Application Due Date: Continuous (Cycle 5)

Beverage Container Recycling Loan Program

Application Due Date: Continuous

Greenhouse Gas Reduction Loan Program

Application Due Date: Continuous

Recycling Market Development Zone Loan Program
Application Due Date: Continuous

Beverage Container Recycling City/County Payment Program

Tentative Open Date: August 19, 2025

D. DISASTER DEBRIS RECOVERY OPERATIONS PROGRAM

Action Items

No items at this time.

Information Items

1. Update on Emergency Disaster Debris Recovery Operations
Department Staff Contact: Chris.McSwain@CalRecycle.ca.gov

E. PRODUCT STEWARDSHIP

Announcements

1. Receipt and review of The Drug Takeback Solutions Foundation's Proposed Changes to its Stewardship Plan for Home-Generated Sharps Waste: Mail-Back Program and Metrics for Education and Outreach. Action Needed. Public comments accepted through August 6, 2025.
Department Staff Contact: PharmaSharps@CalRecycle.ca.gov
[Public Notice](#)
2. Receipt and review of MED-Project's Revised 2024 Annual Report for Covered Drugs. Action Needed by October 16, 2025. Public comments accepted through August 6, 2025.
Department Staff Contact: PharmaSharps@CalRecycle.ca.gov
[Public Notice](#)
3. Receipt and review of MED-Project's Revised 2024 Annual Report for Home-Generated Sharps Waste. Action Needed by October 16, 2025. Public comments accepted through August 6, 2025.
Department Staff Contact: PharmaSharps@CalRecycle.ca.gov
[Public Notice](#)
4. Receipt of Circular CRV Association's Notification regarding Changes to its Dealer Cooperative Stewardship Plan. No Action Needed.
Department Staff contact: DealerCoops@CalRecycle.ca.gov

Decisions Posted

1. Approval of MED-Project's Proposed Changes to its Stewardship Plan for Covered Drugs. Decision Posted: July 7, 2025.
Department Staff Contact: PharmaSharps@CalRecycle.ca.gov

[Public Notice](#)

F. CONTRACTS

Action Items

No items at this time.

Information Items

1. Consideration of Scope of Work for the Tire Market Analysis and Support Contract (Tire Recycling Management Fund, FYs 2025/26, 2026/27 & 2027/28)
Department Staff Contact: Mustafe.Botan@CalRecycle.ca.gov
[Public Notice](#)

G. SOLID WASTE AND TIRE FACILITIES

Information Item

1. Approval of Remediation of a Former Unpermitted Green Waste Processing/Composting Site, Referred to as the Clegg Disposal Site, Under the Solid Waste Disposal and Codisposal Site Cleanup Program
Department Staff Contact: Julian.Lopez@CalRecycle.ca.gov
[Public Notice](#)
2. Approval of the Table Bluff Landfill (Facility No. 12-AA-0022) Remediation under the Solid Waste Disposal and Codisposal Site Cleanup Program
Department Staff Contact: Phil.Kovacs@CalRecycle.ca.gov
[Public Notice](#)

Action Items

1. AgroThrive, Inc., located at 26775 Old Stage Road
Gonzales, CA 93926, Monterey County, Revised Solid Waste Facilities Permit,
Action Needed August 30, 2025
Department Staff Contact: Alexis.Deschryver@CalRecycle.ca.gov
[Public Notice](#)
2. EcoCycle Ventures, Inc, located at 3130 Bayshore Rd, Benicia, CA 95410,
Solano County, New Minor Waste Tire Facility Permit,
Action Needed October 6, 2025
Department Staff Contact: Harprit.Mattu@CalRecycle.ca.gov
[Public Notice](#)
3. Sycamore Landfill, located at 8514 Mast Boulevard, San Diego, CA 92145, City
of San Diego, Revised Solid Waste Facilities Permit, Action Needed August 23,
2025
Department Staff Contact: Cody.Oquendo@CalRecycle.ca.gov

[Public Notice](#)

4. Cal-Waste Double Springs Road Transfer Station, located at 3524 Double Springs Road Valley Springs, CA 95252, Calaveras County, New Solid Waste Facilities Permit, Action Needed August 31, 2025
Department Staff Contact: Patrick.Snider@CalRecycle.ca.gov
[Public Notice](#)
5. Otay Material Recovery Facility, located at 1700 Maxwell Road, Chula Vista, CA 91911, San Diego County, New Solid Waste Facilities Permit, Action Needed September 13, 2025
Department Staff Contact: Cody.Oquendo@CalRecycle.ca.gov
[Public Notice](#)
6. Recology Vallejo, located at 2021 Broadway St., Vallejo, CA 94589, Solano County, Revised Solid Waste Facilities Permit, Action Needed September 20, 2025
Department Staff Contact: Harprit.Mattu@CalRecycle.ca.gov
[Public Notice](#)

H. PUBLIC COMMENT

Get involved in CalRecycle's decision-making process. To more fully engage with Californians on monthly public meeting agenda items, CalRecycle accepts welcomes live public comments [in-person or over-the-phone](#).

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Public Meeting

Monthly Updates



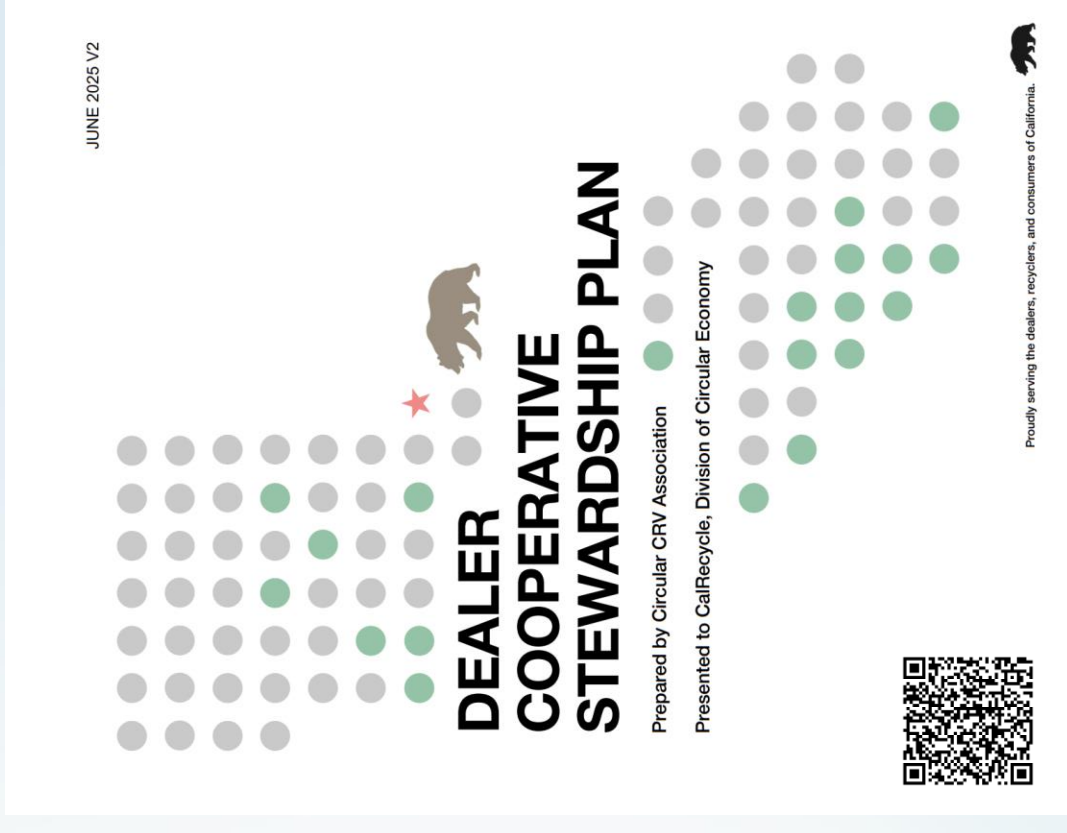
August 19, 2025

Dealer Cooperative Stewardship Plan

Circular CRV Association's Stewardship Plan

- Approved by CalRecycle
 - Posted: July 24th, 2025
 - Copy available online for viewing and download
- Plan changes notification on August 1st, 2025
 - Various updates
 - "Recycle Depot" for consumer-facing business
 - Changes do not require CalRecycle approval

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Beverage Container Redemption Innovation Grant Program



- \$131 million to expand CRV redemption options**
- \$55 million - Recycling centers
 - \$40 million - Dealer Cooperatives
 - \$21 million - Beverage Dealers (retailers)
 - \$15 million - Qualifying Tribal Entities

Apply now:



Plastic Pollution Prevention Reform (SB 54)

Implementation Update

Formal rulemaking process

- Launching in late August
- Public comment period listserv announcement

Advisory Board Meeting

- August 15th, 2025
- **Focus:**
 - Elections for advisory board positions
 - Source Reduction, and Material Design Study overview for statewide Needs Assessment
 - Circular Action Alliance (PRO) update
- Next meeting: September 19th, 2025



Responsible Textile Recovery Act

Implementation Update



Informational Public Workshop

- September 9th, 2025
- **Focus:**
 - Statutory overview of the Producer Responsibility Organization (PRO)
 - PRO application process overview
 - Participate virtually or at CalEPA Headquarters

Reusable Beverage Containers Infrastructure Grant Program



\$23.7 million to establish a Bottle Washer Processor for Reusable Glass CRV Beverage Containers

- Support for infrastructure and start-up costs
- Eligible applicants include:
 - Local governments (cities, counties, or cities and counties)
 - Nonprofit organizations
 - Qualifying Tribal entities
 - Private, for-profit entities

Application period opens: September 2025
Applications due: November 2025

Increased Recycling of Empty Glass Beverage Containers Grant Program

\$10 million to boost glass recycling

- Regional pilot programs for glass container collection at restaurants and retailers
- Eligible applicants include:
 - Certified Recycling Centers
 - Certified collection/drop off programs
 - Certified Community service programs

Applications open: September 2025

Applications due: October 2025



Local Enforcement Agency Grant Program

Award Announcements

\$1.4 million to 59 applicants

- Solid waste facility permit and inspections program
- Non-competitive grant program
- Awards include two counties and one city in California-Mexico border region



Local Government Waste Tire Amnesty Grant Program

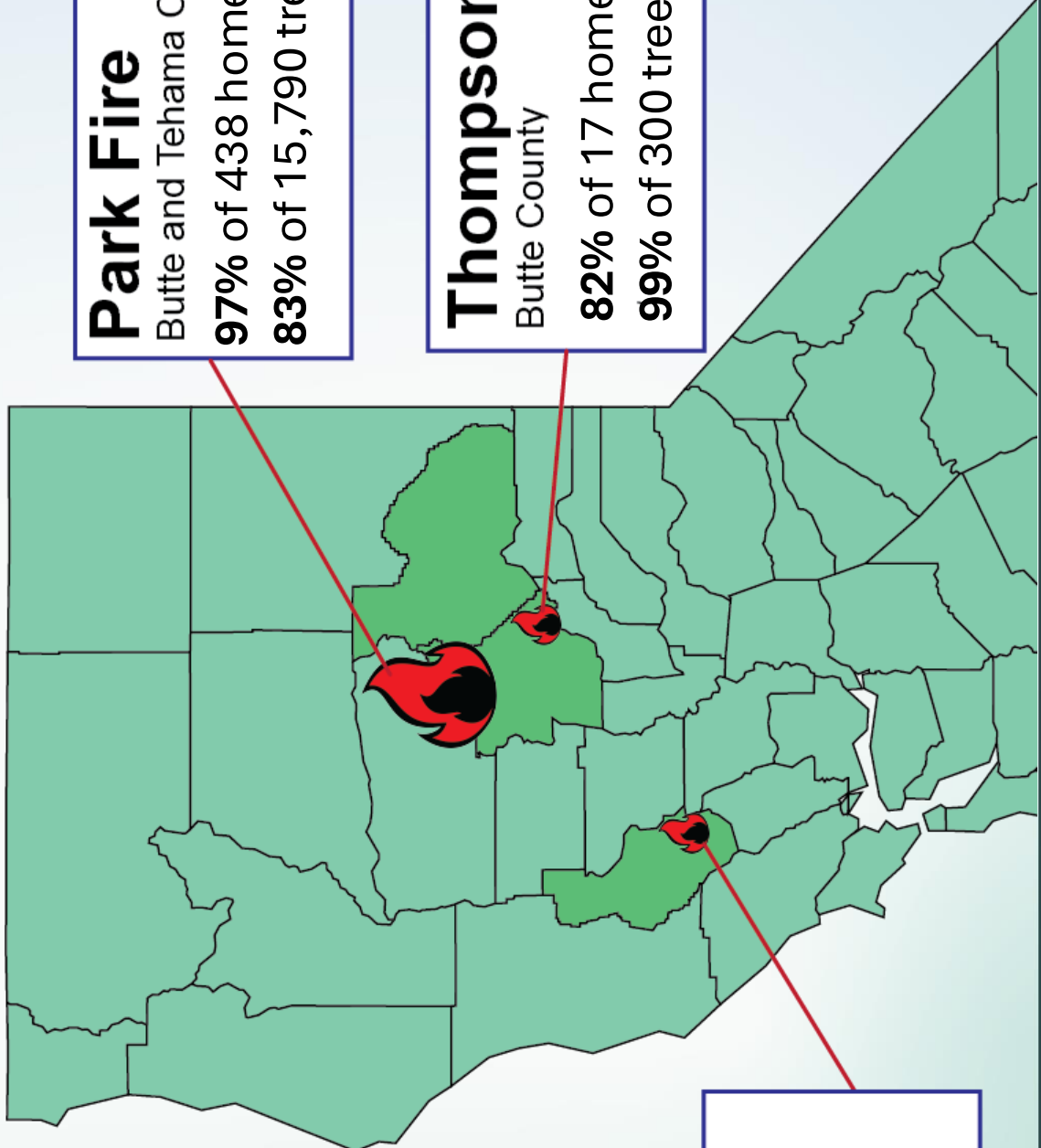
Award Announcements



\$1.4 million to 31 applicants

- Tire amnesty events allow public to drop off waste tires at no charge
- Includes 23 awards to overburdened communities

2024 Disaster Debris Recovery Operations



As of 8/15/2025

Product Stewardship

Home-Generated Sharps Waste Program

The Drug Takeback Solutions Foundation

- Proposed changes to Home-Generated Sharps Waste Stewardship Program
 - Mail-back program and metrics for education and outreach.

Submitted: July 17th, 2025

Status: Under review



Product Stewardship

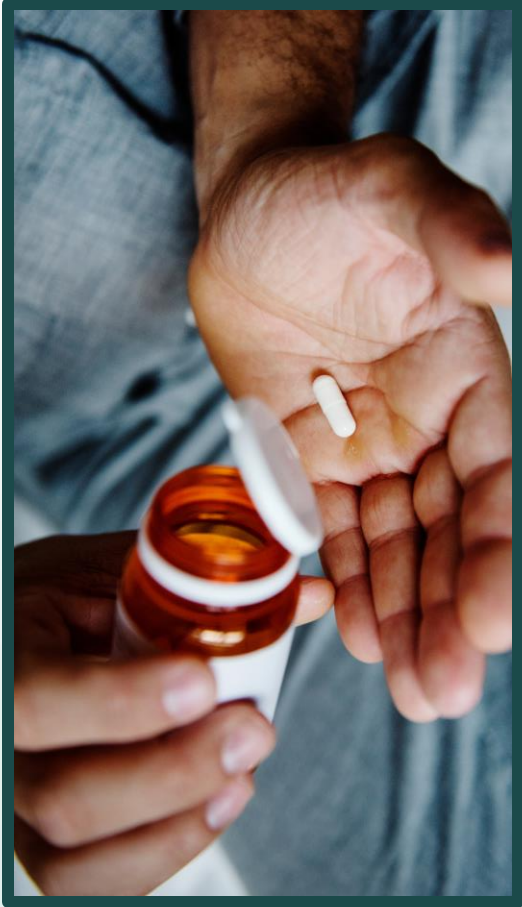
Pharmaceutical and Sharps Waste Programs

MED-Project

- Revised 2024 annual reports for Covered Drugs and Home-Generated Sharps Waste Stewardship Programs

Submitted: July 18th, 2025

Status: Under review



Tire Market Analysis and Support Contract

Contract Scope of Work Approved

- To keep tires out of landfills and boost recycling
- January 2026 – December 2028
- Contract not to exceed \$600,000
- Three annual waste tire market reports
- Two CalRecycle-sponsored tire conferences

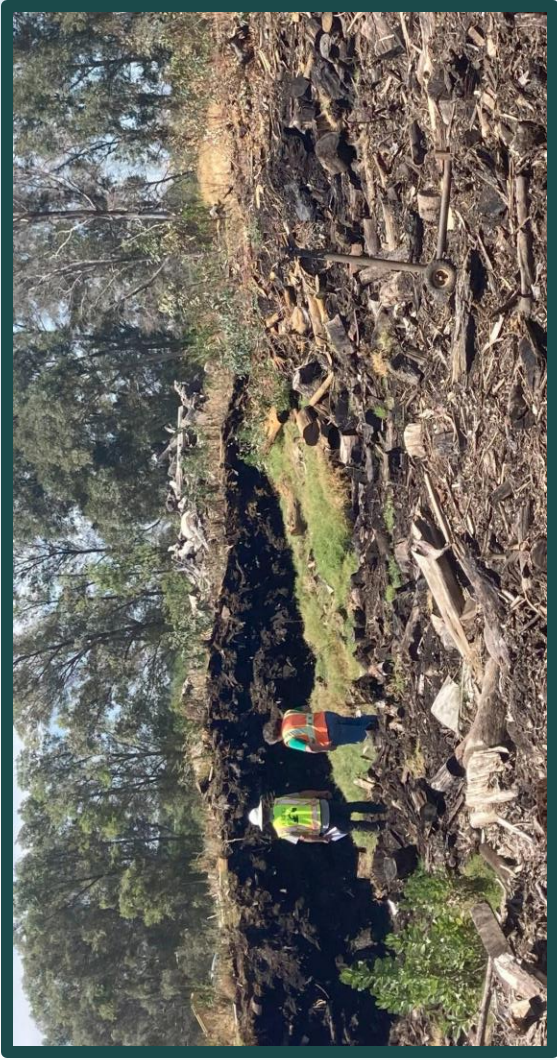
124



Solid Waste Disposal and Co-disposal Site Cleanup Program

Clegg Disposal Site (Yuba County):

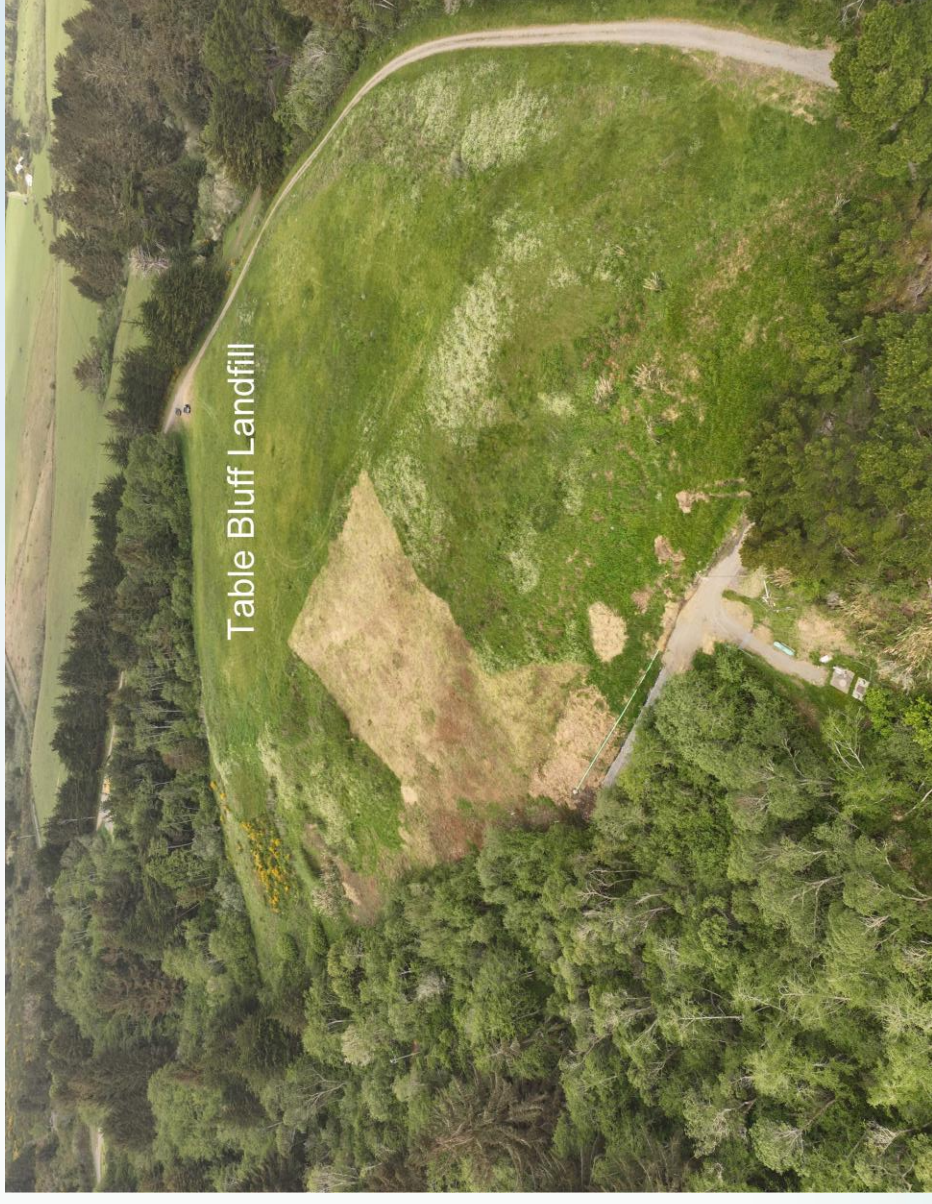
- Unpermitted Green Waste Processing/Composting Site
- Large quantity of material with ongoing fire threat
- CalRecycle-managed remediation estimated at \$620,000



Solid Waste Disposal and Co-disposal Site Cleanup Program

Table Bluff Landfill (Humboldt County):

- Landfill with cap settlement and deficient drainage and leachate collection systems
- Project to regrade part of the cap and repair/replace drainage and leachate collection systems
- CalRecycle-managed remediation estimated at \$1.5 million



Upcoming Grant Cycles

- **Illegal Disposal Site Abatement Grants**
- **Legacy Disposal Site Abatement Partial Grants**
 - Application period opens: Week of September 1st
 - Applications due: October 15, 2025
 - Award Announcement: December 2025

More details available online soon:



Facility Permit Update

1. AgroThrive, Inc., located at 26775 Old Stage Road, Gonzales, CA 93926, Monterey County, Revised Solid Waste Facilities Permit, Action Needed August 30, 2025
2. EcoCycle Ventures, Inc, located at 3130 Bayshore Rd, Benicia, CA 95410, Solano County, New Minor Waste Tire Facility Permit, Action Needed October 6, 2025
3. Sycamore Landfill, located at 8514 Mast Boulevard, San Diego, CA 92145, City of San Diego, Revised Solid Waste Facilities Permit, Action Needed August 23, 2025
4. Cal-Waste Double Springs Road Transfer Station, located at 3524 Double Springs Road Valley Springs, CA 95252, Calaveras County, New Solid Waste Facilities Permit, Action Needed August 31, 2025
5. Otay Material Recovery Facility, located at 1700 Maxwell Road, Chula Vista, CA 91911, San Diego County, New Solid Waste Facilities Permit, Action Needed September 13, 2025
6. Recology Vallejo, located at 2021 Broadway St., Vallejo, CA 94589, Solano County, Revised Solid Waste Facilities Permit, Action Needed September 20, 2025

Monthly Public Meeting

10:00 A.M., September 16, 2025
Cal/EPA Building – Byron Sher Auditorium
Via [Webcast](#)

A. DIRECTOR'S REPORT

Presentations or discussions by the Director and/or Executive Offices regarding department matters, legislative updates, public affairs, or initiatives.

B. POLICY & PROGRAM UPDATE

Action Items

1. Plastic Pollution Prevention Act (SB 54) Implementation Update
Department Staff Contact: Packaging@CalRecycle.ca.gov

Announcements

1. Plastic Pollution Prevention Act (SB 54) Material Characterization Study Revised Preliminary Findings
Department Staff Contact: WasteChar@calrecycle.ca.gov
2. Textile Producer Responsibility Organization Applications Due by January 1, 2026
Department Staff Contact: Textiles@CalRecycle.ca.gov
[Public Notice](#)
3. SB 498 Annual Biomass Conversion Reporting
Department Staff Contact: Frederick.Thomas@calrecycle.ca.gov

C. BEVERAGE CONTAINER RECYCLING PROGRAM

Action Item

No items at this time.

Information Item

1. Certification & Registration 2025 Q2 Update
Department Staff Contact: Gerald.Blancher@CalRecycle.ca.gov
[Public Notice](#)
2. Enforcement 2025 Q2 Update
Department Staff Contact: Gerald.Blancher@CalRecycle.ca.gov
[Public Notice](#)

D. GRANT AND LOAN PROGRAMS

Action Items

1. Revised Eligibility Criteria for the Beverage Container Recycling Loan Program (California Beverage Container Recycling Fund, Fiscal Year 2022-23)
Department Staff Contact: Adam.StClair@CalRecycle.ca.gov
[Public Notice](#)
2. Eligibility Criteria for the Tire Equipment Loan Program (Tire Recycling Management Fund, Fiscal Year 2025-26)
Department Staff Contact: Adam.StClair@CalRecycle.ca.gov
[Public Notice](#)

Information Item

1. Awards for the Tire-Derived Aggregate Grant Program (Tire Recycling Management Account, Fiscal Year 2025-26)
Department Staff Contact: Christopher.Henderson@CalRecycle.ca.gov
[Public Notice](#)

Open Applications:

Beverage Container Redemption Innovation Grant Program (Qualifying Tribal Entities)

Application Due Date: September 16, 2025 (Cycle 4) (Revised)

Recycled Glass Processing Incentive Grant Program

Application Due Date: September 25, 2025 (Cycle 2)

Farm and Ranch Solid Waste Cleanup and Abatement Grant

Application Due Date: October 7, 2025 (Cycle 88)

Tire-Derived Aggregate Grant Program

Application Due Date: October 16, 2025 (Cycle 26)

Beverage Container Recycling City/County Payment Program

Application Due Date: November 18, 2025 (FY25-26)

Beverage Container Redemption Innovation Grant Program (Dealer Cooperatives)

Application Due Date: Continuous through June 30, 2026 (Cycle 5)

Beverage Container Recycling Loan Program

Application Due Date: Continuous

Greenhouse Gas Reduction Loan Program

Application Due Date: Continuous

Recycling Market Development Zone Loan Program
Application Due Date: Continuous

Increased Recycling of Empty Glass Beverage Containers Grant Program
Application Tentatively Opening Mid-September

Reusable Beverage Containers Infrastructure Grant Program
Application Tentatively Opening Mid-September

E. CONTRACTS

Action Items

No items at this time.

Information Item

1. Consideration of Scope of Work for the Investigation into Using Crumb Rubber as a Supplementary Cementitious Material in Concrete (Tire Recycling Management Fund, FY 2025/26)
Department Staff Contact: Mustafe.Botan@CalRecycle.ca.gov
[Public Notice](#)

F. E-WASTE

Action Items

1. Request for Approval to Establish the Proposed Covered Battery-Embedded Waste Recycling Fee Pursuant to SB 1215
Department Staff Contact: EmbeddedBatteries@CalRecycle.ca.gov
[Public Notice](#)

Information Items

No items at this time.

G. PRODUCT STEWARDSHIP

Announcements

1. Receipt of Circular CRV Association's Notification regarding Changes to its Dealer Cooperative Stewardship Plan. No action needed.
Department Staff Contact: DealerCoops@CalRecycle.ca.gov
2. Approval of Annual CalRecycle Paint Stewardship Program Administrative Fee for July 1, 2024, through June 30, 2025. Action needed by September 30, 2025.
Department Staff Contact: Paint@CalRecycle.ca.gov
[Public Notice](#)
3. Receipt and review of Carpet America Recovery Effort's 2024 Annual Report. Action needed. Public comments accepted through September 19, 2025.

Department Staff Contact: Carpet@CalRecycle.ca.gov
[Public Notice](#)

Decisions Posted

1. Approval of The Drug Takeback Solutions Foundation's Proposed Changes to its Stewardship Plan for Home-Generated Sharps Waste: Local Agency Requests.
Decision posted August 28, 2025.
Department Staff Contact: PharmaSharps@CalRecycle.ca.gov
[Public Notice](#)
2. Disapproval of The Drug Takeback Solutions Foundation's Proposed Changes to its Stewardship Plan for Covered Drugs: Reasonable Geographic Spread.
Decision posted August 21, 2025.
Department Staff Contact: PharmaSharps@CalRecycle.ca.gov
[Public Notice](#)

H. LOCAL ASSISTANCE

Action Items

No items at this time.

Information Items

1. Five-Year Review Report for the Regional Agency Integrated Waste Management Plan for the Del Norte Solid Waste Management Authority
Department Staff Contact: Marshalle.Graham@CalRecycle.ca.gov
[Public Notice](#)

I. SOLID WASTE AND TIRE FACILITIES

Action Items

1. EcoCycle Ventures, Inc, located at 3130 Bayshore Rd, Benicia, CA 95410, Solano County, New Minor Waste Tire Facility Permit,
Action Needed October 6, 2025
Department Staff Contact: Harprit.Mattu@CalRecycle.ca.gov
[Public Notice](#)
2. Sycamore Landfill, located at 8514 Mast Boulevard, San Diego, CA 92145, City of San Diego, Revised Solid Waste Facilities Permit, Action Needed October 24, 2025
Department Staff Contact: Cody.Oquendo@CalRecycle.ca.gov
[Public Notice](#)
3. Recology Vallejo, located at 2021 Broadway St., Vallejo, CA 94589, Solano County, Revised Solid Waste Facilities Permit, Action needed October 22, 2025
Department Staff Contact: Harprit.Mattu@CalRecycle.ca.gov

Public Notice

4. Chicago Grade Landfill, located at 2290 Homestead Road, Templeton, CA 93465, San Luis Obispo County, Modified Solid Waste Facilities Permit, Action needed November 6, 2025
Department Staff Contact: Cody.Oquendo@CalRecycle.ca.gov
[Public Notice](#)
5. Tulare County Compost Facility, located at 8614 Ave. 328, Visalia, CA 93291, Tulare County, New Compostable Materials Handling Facility Permit, Action needed November 1, 2025
Department Staff Contact: Joy.Bowers@CalRecycle.ca.gov
[Public Notice](#)
6. San Mateo County: Shoreway Environmental Center, located at 333 Shoreway Road San Carlos, CA 94070, San Mateo County, Revised Solid Waste Facilities Permit, Action needed October 26, 2025
Department Staff Contact: Kelsey.Orr@CalRecycle.ca.gov
[Public Notice](#)

Information Item

No items at this time.

J. PUBLIC COMMENT

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Public Meeting

Monthly Updates



September 16, 2025

Plastic Pollution Prevention Reform (SB 54)

Implementation Update

Formal rulemaking process

- Initiated August 22nd, 2025
- 45-day public comment period through October 7th, 2025

Draft Program Environmental Impact Report

- 45-day public comment period:
August 26th to October 10th, 2025

Covered Material Categories List

- Update published:
September 2nd, 2025

Advisory Board

- Next meeting: September 19th, 2025
- Sierra Hearing Room, CalEPA HQ

Responsible Textile Recovery Act

Implementation Update

Now Accepting Producer Responsibility Organization (PRO) Applications

✓ Visit PRO Application Webpage



✓ Resources linked to agenda:

- Solicitation Letter
- Application Form
- Workshop Presentation



Application Deadline: 11:59 p.m. on January 1, 2026

Application Review and Approval: March 1, 2026

Biomass Conversion 2024 Annual Report

Biomass turns wood waste
and nut shells into electricity

Annual Reporting:

- Amounts
- Types
- Sources



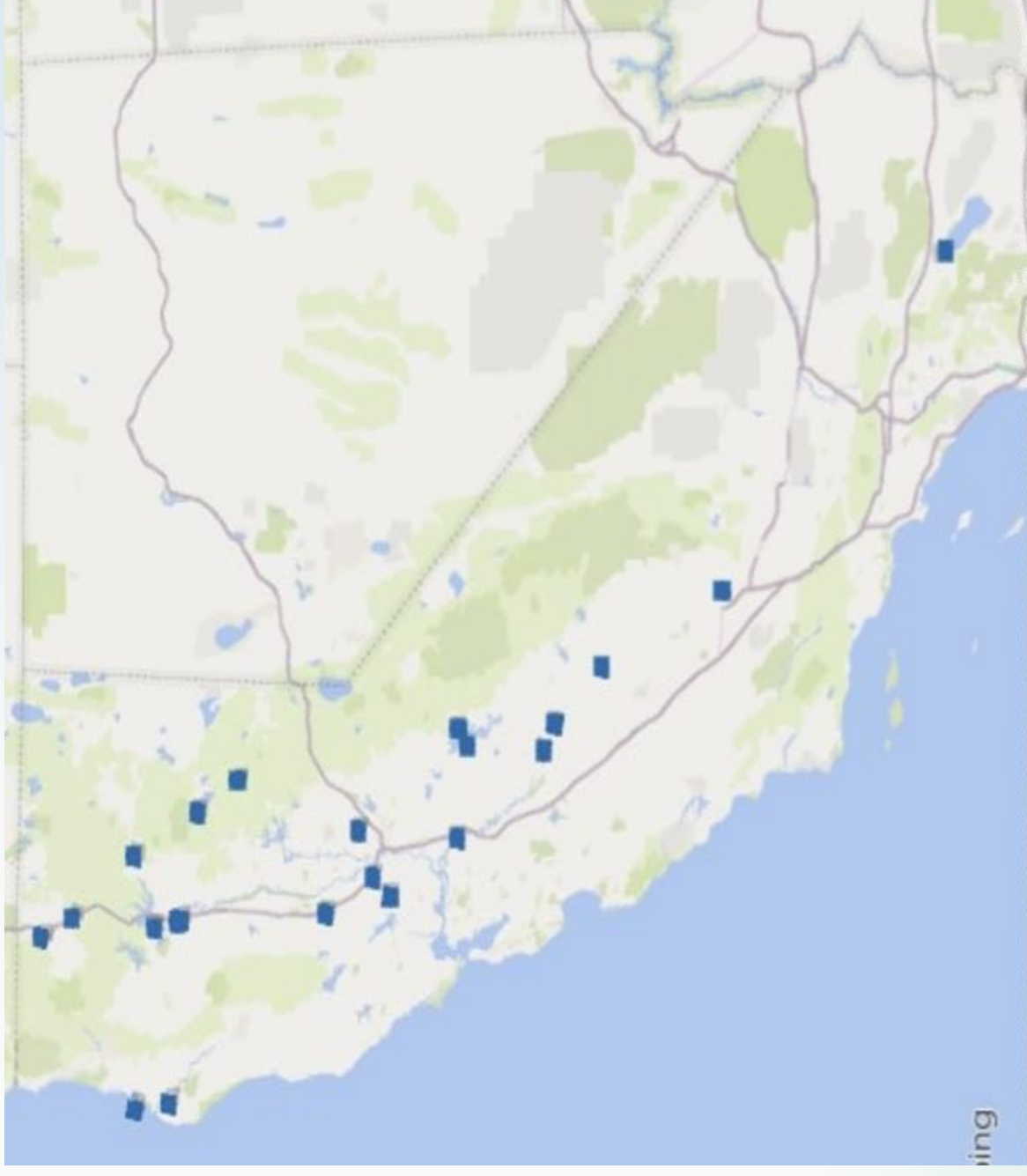
California Biomass Conversion Facilities

2024: 22 active facilities

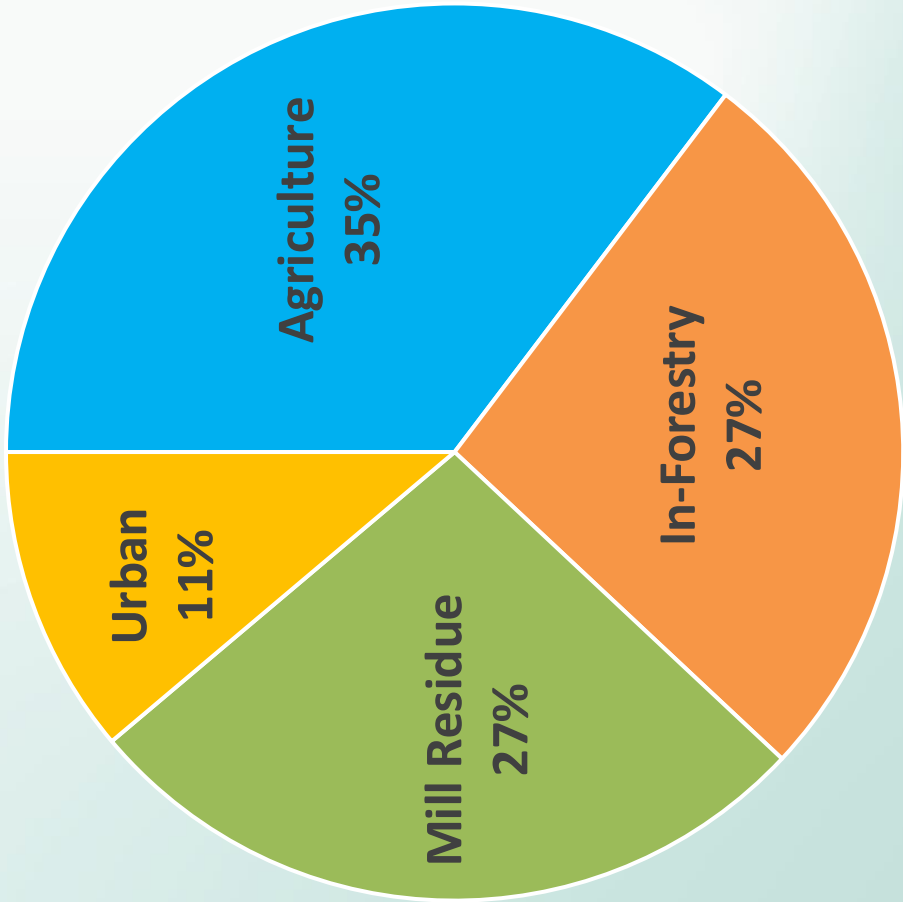
1980s: 50+ facilities

Declines partially attributed to:

- Cheaper sources of energy
- Landfilling alternative
- Subsidy fluctuations



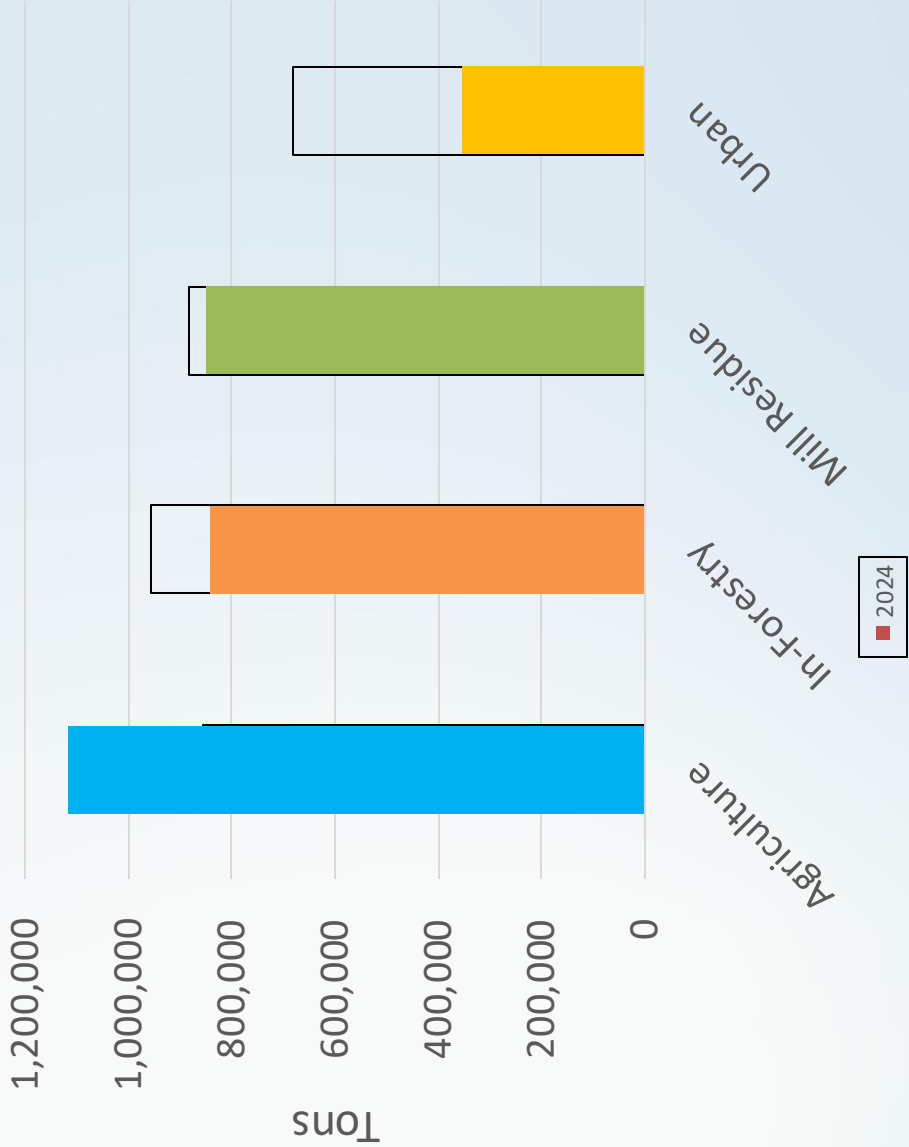
Sources for Materials 2024



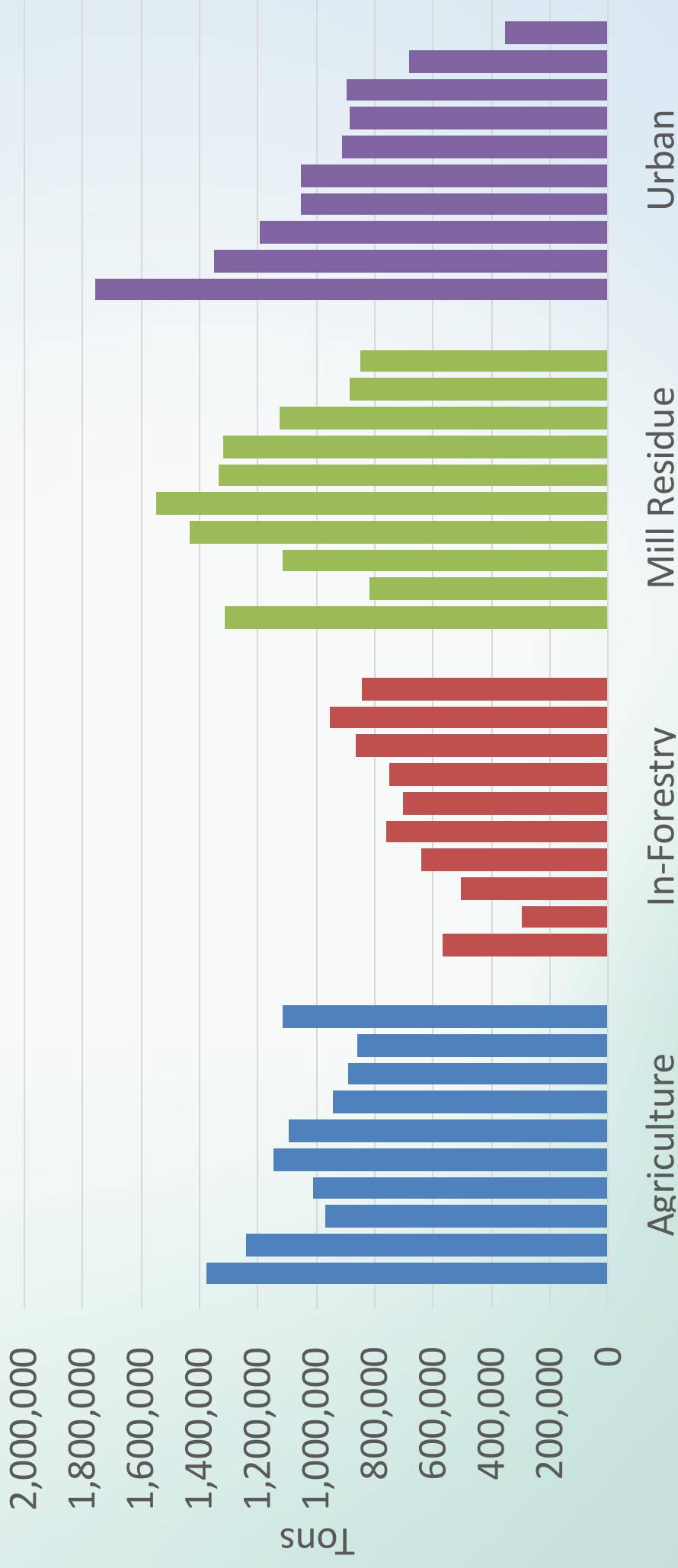
Materials Source	Tons Accepted
Agriculture	1,116,359
In-Forestry	842,092
Mill Residue	848,922
Urban	352,480
Total	3,159,853

Change in Tonnage 2023-2024

Material Source	2023	2024	Difference
Agriculture	857,813	1,116,359	258,546
In-Forestry	956,357	842,092	-114,265
Mill Residue	884,305	848,922	-35,383
Urban	682,716	352,480	-330,236
Total	3,381,191	3,159,853	-221,338



Change in Tonnage 2015-2024



Chat with CalRecycle

- **September 17th, 1 to 3 p.m.**
- **Focus:** Sustainable funding for Food Recovery Organizations and Services
- Register online to participate or scan the QR code



Beverage Container Recycling Loan Program

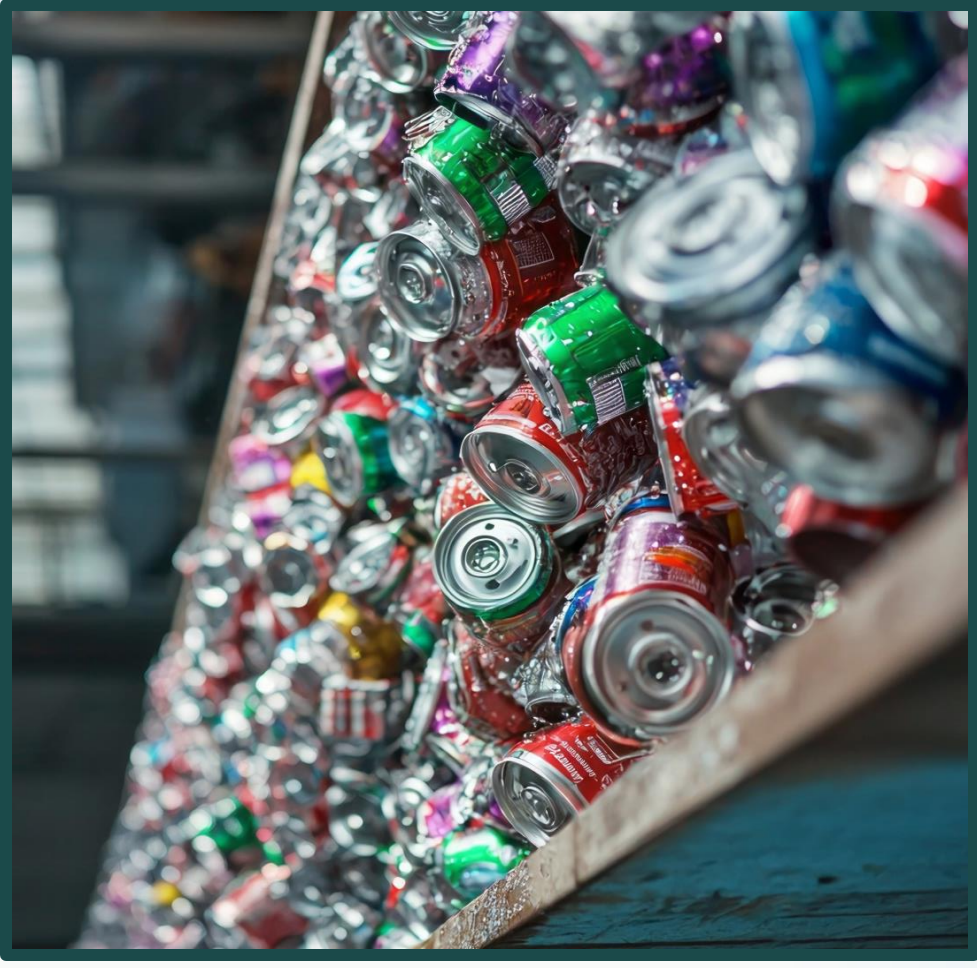
Revised criteria for projects:

- Eligible projects
 - Expand capacity at existing certified processors
 - Process all CRV beverage container types
- Project preference in underserved areas
- Awards range from \$500,000 to \$10 million

Eligible applicants:

- Private businesses
- Nonprofits
- Local Governments

Information or questions: bzassist@calrecycle.ca.gov.



Tire Equipment Loan Program



Criteria for projects:

- Tire-derived product manufacturing, feedstock processing, or reuse activities
- Project preferences
- Maximum \$1 million loan amount

Eligible applicants:

- Private businesses
- Nonprofits
- Local Governments

Information or questions:
bzassist@calrecycle.ca.gov

Tire-Derived Aggregate (TDA) Grant Program

Award Announcement

\$241,774 to OC Waste and Recycling

- TDA landfill gas wells
- Brea, California
- [More information linked to agenda](#)

Since 2014, Tire-Derived Aggregate grant projects have kept over 5 million tires from being littered or landfilled in California



Crumb Rubber Supplementary Material in Concrete

Contract Update



Scope of Work

- Crumb rubber as a partial cement replacement
- For performance and functionality balance
- Not to exceed \$374,999
- San Jose State University
- **Approved**

Covered Battery-Embedded Waste Recycling Fee (SB 1215)

- Must be established by October 1, 2025.
- On or after January 1, 2026, 1.5% of the retail sales price for each covered battery-embedded product sold for use in this state by a retailer.
- The covered battery-embedded waste recycling fee shall not exceed \$15.00.
- “Retail sales price” shall have the same meaning as “sales price” (Section 6011 of the Revenue and Taxation Code).
- Rulemaking package to be sent to the Office of Administrative Law: Fall 2025.
- Interested parties may comment on the rulemaking package when the emergency regulations are filed at the Office of Administrative Law.

Beverage Container Recycling Program

- ✓ Certification and Registration Report Published
- ✓ Enforcement Report Published
 - Linked to today's agenda
 - Posted on CalRecycle's website

Subscribe to Beverage Container Recycling Program email updates



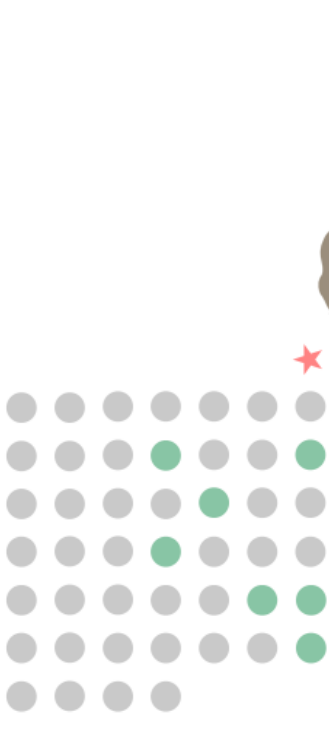
Dealer Cooperative Stewardship Plan

Circular CRV Association's Stewardship Plan

- Changes to approved plan: September 1, 2025
 - List of dealer members updated
 - Unserved convenience zones where the dealer cooperative will provide redemption
 - Redemption sites
 - Redemption contractors
- Changes don't require CalRecycle approval

149

SEPTEMBER 2025



DEALER

**COOPERATIVE
STEWARDSHIP PLAN**

Prepared by Circular CRV Association

Presented to CalRecycle, Division of Circular Economy



Proudly serving the dealers, recyclers, and consumers of California.



California Paint Stewardship Program

Administrative Fee



- CalRecycle's full administrative and enforcement costs
- July 1, 2024 - June 30, 2025: \$615,941.46
- Subscribe to program listserv for updates

California's Carpet Stewardship Program

Carpet America Recovery Effort 2024 Annual Report

- Received: September 1, 2025
- Under review
- Comments accepted through September 19th
- Compliance determination to be posted online and announced at future public meeting

More information linked to agenda



Five-Year Review Reports

- Regional Agency Integrated Waste Management Plan for the Del Norte Solid Waste Management Authority

✓ Reports submitted

✓ No changes at this time

✓ Both plans approved



Facility Permit Update

1. EcoCycle Ventures, Inc, located at 3130 Bayshore Rd, Benicia, CA 95410, Solano County, New Minor Waste Tire Facility Permit, Action Needed October 6, 2025
2. Sycamore Landfill, located at 8514 Mast Boulevard, San Diego, CA 92145, City of San Diego, Revised Solid Waste Facilities Permit, Action Needed October 24, 2025
3. Recology Vallejo, located at 2021 Broadway St., Vallejo, CA 94589, Solano County, Revised Solid Waste Facilities Permit, Action needed October 22, 2025
4. Chicago Grade Landfill, located at 2290 Homestead Road, Templeton, CA 93465, San Luis Obispo County, Modified Solid Waste Facilities Permit, Action needed November 6, 2025
5. Tulare County Compost Facility, located at 8614 Ave. 328, Visalia, CA 93291, Tulare County, New Compostable Materials Handling Facility Permit, Action needed November 1, 2025
6. San Mateo County: Shoreway Environmental Center, located at 333 Shoreway Road San Carlos, CA 94070, San Mateo County, Revised Solid Waste Facilities Permit, Action needed October 26, 2025

Unified Program Newsletter – August 2025

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CalEPA

Request to Submit Abstracts: 28th Annual CUPA Conference

The California CUPA Forum Board's conference committee is requesting abstracts for the 2026 CUPA Conference. Abstracts must be submitted through the CUPA Forum conference website at <https://www.calcupa.org/conference/index.html> beginning August 1, 2025, through September 19, 2025. Please note that speaker biographies must be submitted and approved prior to submitting an abstract. For additional information or questions regarding abstracts for the 28th Annual Conference, please contact the Conference Manager at conferencemanager@calcupa.org or call (530) 676-0815.

The Unified Program State Agencies recognizes that presenting at the conference is a significant commitment for both UPA management and the individual presenter. UPAs that meet their program obligations while also presenting at the CUPA Conference will be recognized for their outstanding achievements.

CERS

Merging Facility Records

There should only be one CERS ID for a location in CERS, but occasionally we encounter duplicate CERS IDs for the same location. Regulator users can eliminate the "duplicate" CERS ID while maintaining the submittal history for both facilities by merging the records. The merge process is irreversible. Please refer to the "How to Merge

Duplicate Facilities in CERS" article at the end of this Newsletter for more information and instructions for how to merge facilities in CERS.

If you have any questions regarding the merge process, please contact CERS Technical Help (cers@calepa.ca.gov).

State Water Board

Report 6 Due September 1, 2025

The State Water Board recently distributed the Report 6 forms and instructions to all UPAs for the reporting period of January 1 through June 30, 2025. UPAs must submit the completed Report 6 no later than September 1, 2025.

If inaccurate Report 6 data is submitted, it will be returned to the UPA for corrections. Corrected Report 6 submissions must also be received by the September 1, 2025, deadline to avoid being considered late.

Consistent with the last several reporting periods, UPAs will continue to report field constructed tanks, facilities with USTs that have received red tags, and facilities that have abandoned or temporarily closed USTs.

For more information regarding Report 6 requirements please contact Magnolia Busse at (916) 341-5870 or Magnolia.Busse@waterboards.ca.gov.

Chapter 16 Rewrite Update

The State Water Board will decide whether to adopt the proposed amendments to the UST Regulations as part of the September 3, 2025, Board Meeting. If adopted, a copy of the proposed UST Regulations will be available soon after the meeting. The rulemaking will then be submitted to the Office of Administrative Law for approval and is expected to take effect on January 1, 2026.

For additional information regarding the Chapter 16 rewrite, please contact Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.

Overfill Prevention Equipment Methods on Hybrid USTs

Hybrid systems, which are double-walled USTs with single-walled product piping installed before July 1, 1987, are required to upgrade or permanently close the single-walled piping before the December 31, 2025, closure deadline (See H&SC, chapter 6.7, section 25292.05(a)(1)). Currently, these USTs may utilize any of the overfill prevention equipment methods, regardless of whether the vent or fill piping is secondarily contained, as noted in [Local Guidance 150](https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lgs/docs/150-3.pdf) (https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lgs/docs/150-3.pdf).

If the owner or operator upgrades the hybrid system but continues to utilize the single-walled vent or fill piping exclusions specified in H&SC 6.7, section 25281.5, the UST may only utilize the overfill prevention equipment methods described in UST Regulations,

section 2636(a). Alternatively, if the hybrid system is upgraded, and the vent or fill piping is secondarily contained, the UST may utilize any of the overfill prevention equipment methods listed in UST Regulations, section 2635(c)(1).

For additional information regarding single-walled or hybrid systems, please contact Jenna Hartman at (916) 327-8563 or Jenna.Hartman@waterboards.ca.gov.

UST Certification of Installation/Modification - California Environmental Reporting System

In accordance with UST Regulations, sections 2635(f) and 2636(c), the UST Certification of Installation/Modification submittal element must be completed whenever a tank or piping installation occurs. It is the UPA's responsibility to ensure that the California Environmental Reporting System (CERS) submittal includes this element before accepting the submittal.

Evaluation staff will review whether the UST Certification of Installation/Modification is being properly utilized and will document this as an observation during evaluations. Beginning January 1, 2026, owners and operators must submit the UST Certification of Installation/Modification form within 30 days of a tank, piping, or containment sump installation inspection. UPAs that do not correctly utilize the UST Certification of Installation/Modification submittal element may be issued a deficiency or incidental finding.

For questions regarding the UST Certification of Installation/Modification submittal element in CERS, please contact Michelle Suh at (916) 323-0878 or Michelle.Suh@waterboards.ca.gov.

DTSC

Tiny Topic Training Update – Reaching Inspectors Across California

The Department of Toxic Substances Control (DTSC) continues to expand its outreach through Tiny Topic Training sessions delivered at Northern California Technical Assistance Group (TAG), Southern California TAG, and Central Region CUPA Forum Board (CFB) meetings. These brief yet impactful training segments are designed to strengthen technical knowledge and regulatory understanding across a variety of subjects.

So far, DTSC has delivered four Tiny Topic presentations to CUPAs:

- 10x/20x Rules
- Financial Assurance for Tiered Permitting
- Used Oil Definitions
- Speculative Accumulation

What's next?

We are actively developing new Tiny Topics, including:

- Hazardous Waste Tracking System (HWTS)
- Outdoor Shooting Ranges
- Environmental Releases
- Point of Generation

While the topics may be “tiny,” the effort behind them is greater than tiny. Our staff dedicates time and expertise to ensure the most relevant and accurate information is shared during each presentation. These sessions are valuable for new inspectors seeking foundational knowledge, as well as experienced inspectors looking to refresh their understanding of specific regulatory areas.

To maximize the reach of these training courses, we encourage **CUPA managers** to **share the materials** and information with your teams following TAG and CFB meetings.

We are also exploring additional ways to extend Tiny Topic Training access to a broader audience, including industry partners and newly onboarded staff.

Thank you for your continued collaboration in strengthening California's hazardous waste management regulations.

In-Person Environmental Sampling for Enforcement Training Sections Update

DTSC is proud to announce the continued success of our In-Person Environmental Sampling for Enforcement Training, designed to strengthen field capabilities and promote consistency in environmental sampling procedures across California.

This hands-on training has been delivered throughout the state and will now be offered annually in Northern, Central, and Southern California. Additionally, DTSC's Office of Criminal Investigation has presented this training during the CUPA Conferences, helping extend its reach to a wider regulatory audience.

Upcoming Training Schedule:

- **Chatsworth** – September 17, 2025 (Limited spots remaining, please contact DTSC_CUPATrainers@dtsc.ca.gov if you would like to attend this training section.)
- **San Mateo** – October 1, 2025 - Currently full; waitlist available. Please submit the registration form if you would like to be added to the waiting list. The registration form is located at the following link:
https://forms.office.com/Pages/ResponsePage.aspx?id=9PtPP2DHKky6uMY-9L0kOUOUI8FqzDJKtQuXPjc_pyNUNkg0WkpWWEFHQTdUMjdDVVIUUVQ5OEo5UC4u
- **Fresno** – November 19, 2025 - Now accepting registrations. The registration form is located at the following link:
https://forms.office.com/Pages/ResponsePage.aspx?id=9PtPP2DHKky6uMY-9L0kOUOUI8FqzDJKtQuXPjc_pyNUREFNTE84Vk1NWkZZUFk3RkU1Uk1W0EFFSi4u

The training will focus on preparation and sampling techniques for environmental sampling for enforcement.

- Students will learn how to prepare for sampling, sampling strategies, the various sampling equipment to use, the various laboratory analyses to request, how to interpret the results, and how to present those results to be able to build legally defensible cases.

- Includes hands-on training with sampling equipment to learn how to collect and document various types of samples.

We encourage early registration to secure your spot, as space is limited, and demand remains high.

Now Available: Recorded Training – Hazardous Waste Sampling and Lab Results Interpretation

The CUPA Training and Assistance Unit is pleased to announce that the “**Hazardous Waste Sampling and Lab Results Interpretation**” training, which was virtually delivered by DTSC in May 2025, is now available as a recorded course on the CalCUPA Learning Management System (LMS). You can access the training here:

https://calcupa.org/lms-course/index.html?moodle_course_id=103

This session covers:

- When and why to conduct hazardous waste sampling
- Choosing appropriate sampling methods
- Proper documentation and chain of custody
- Selecting analytical methods
- Interpreting lab data, including qualifiers and QA/QC checks
- Applying lessons through real-world case examples

Participants who complete the recorded course through the CalCUPA Learning Management System will also earn two Continuing Education Units (CEUs).

If you have any follow-up questions or would like to recommend future training topics, please contact us at dtsc_cupatrainers@dtsc.ca.gov.

References or links to information cited in this newsletter are subject to change. CalEPA is interested in your comments and suggestions regarding the Unified Program monthly newsletter. Please email your comments and suggestions to: cupa@calepa.ca.gov.

[CalEPA Unified Program Home Page](#)

How to Merge Duplicate Facilities in CERS

Newsletter Article Updated: August 2025

Question: A new manager unknowingly created a new CERS ID and made a submittal for an existing facility in CERS. CERS now has two CERS IDs for the same site. Can the two CERS IDs be merged to eliminate the 'duplicate' CERS ID created and not lose the Submittal History made?

Answer: A business should not create a new CERS ID unless one has not already assigned to that location. **The Merge Facility feature in CERS can be used to eliminate duplicate CERS ID for the same location within the same business/Organization.** Regulators will first need to use the **Facility Transfer** function so that both facilities are in the same business/Organization, then merge facility records. The duplicate facility record will be merged into the target facility record and all its submittals will be transferred to the target facility. Following the facility merge, the duplicate CERS ID will be deleted from CERS as part of the merge process – ***this action is irreversible.**

Example:

10179983	Test Facility	existing CERS ID	1234 Main Ave	Sacramento	95838	CAL123456789	8/27/2021
10182611	Test Facility	duplicate CERS ID	1234 Main Ave	Sacramento	95838		2/18/2022

Organization 1 (Duplicate Facility Record)

General Information

Organization Name

CalEPA Test Business Organization

Edit

Business Lead Regulator

Sacramento County Environmental Management Department

Facility/User Counts

1 / 1

Headquarters

Sacramento, CA

Multi-Jurisdictional? (MJB)

No

Organization Code

90036460

Origin

Business (Organization was established by a Business User in the Business Portal.)

Last Submittal (Any facility/element)

02/18/2022

People

	First Name	Last Name	Email	Title	Account Status
Select	Tara	Van	tara.van@calepa.ca.gov	Admin	Username: Taravan2 Permissions: Lead Users Last Sign-in: 2/21/2022 7:34 AM

Show All People All Roles Export To Excel

Facilities

	Facility Name	Street Address	City	ZIP Code	LastSubmittal
10182611	Test Facility	1234 Main Ave	Sacramento	95838	02/18/2022

Organization 2 (Target Facility)

General Information

Organization Name

CalEPA Test Business Organization

Edit

Business Lead Regulator

Sacramento County Environmental Management Department

Facility/User Counts

2 / 4

Headquarters

Sacramento, CA

Multi-Jurisdictional? (MJB)

No

Organization Code

90016663

Origin

CUPA (Established by a CUPA Lead User in the Regulator Portal.)

Last Submittal (Any facility/element)

10/05/2021

People

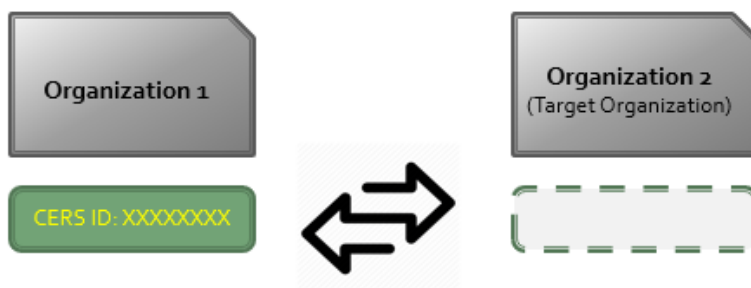
	First Name	Last Name	Email	Title	Account Status
Select	Jessie	Perez	jperez@calepa.ca.gov		Username: jperez Permissions: Lead Users Last Sign-in: 2/9/2022 1:22 PM
Select	Tara	Van	tara.van@calepa.ca.gov		Username: Taravan2 Permissions: Lead Users Last Sign-in: 2/21/2022 7:34 AM
Select	Neeraj	Seelam	neeraj.seelam@calepa.ca.gov		Username: neerajseelam Permissions: Lead Users Last Sign-in: 2/18/2022 1:20 PM
Select	Siva	Musam	siva.musam@calepa.ca.gov		Username: No Account Permissions: Lead Users Last Sign-in: Never

Show All People All Roles Export To Excel

Facilities

	Facility Name	Street Address	City	ZIP Code	LastSubmittal
10179983	Test Facility	1234 Main Ave	Sacramento	95838	08/27/2021
10181738	FTT Facility Transfer Test	1001 I St	Sacramento	95814	10/05/2021

Facility Transfer



1. Open your web browser and navigate to the **CERS Central** Home page:
<https://cers.calepa.ca.gov>
2. Select the (blue) “**Regulator Portal Sign In**” button.
3. Sign in to the **CERS Regulator portal** by entering your CERS Regulator account **username** and **password**.
4. Prior to performing the transfer, review the **Business/Organization** current **Submittal History**.
 - At the menu bar, select the **Businesses** button, input the **Business Name (Organization 2)** and click the blue **Search** button.
 - Click the blue **Select** button next to the **Business** name.
 - At the **Business Summary** page, click the **Submittal** link on the left. **Please note** there are 4 separate submittals in this example.

Facility: Test Facility (CERSID: 10179983)

Home » Facility Search » Facility Summary_10179983 » Submittal History

Submittal History for Test Facility

*Note: Submittal data is current as of 2/18/2022 at 12:00 AM.

CERSID	Address	Submitted	Facility	Inventory	Plans	UST	TP	RMR	Remote	Tank	APSA
10179983	Test Facility 1234 Main Ave Sacramento, 95838	8/27/2021 8:48PM	Accepted	Submitted 8/27/2021	Submitted 8/27/2021						
10179983	Test Facility 1234 Main Ave Sacramento, 95838	6/2/2021 2:57PM	Certified 6/2/2021	Certified 6/2/2021	Certified 6/2/2021						
10179983	Test Facility 1234 Main Ave Sacramento, 95838	2/15/2021 7:08PM	Certified 2/15/2021	Certified 2/15/2021	Certified 2/15/2021						
10179983	Test Facility 1234 Main Ave Sacramento, 95838	2/11/2021 10:42AM	Accepted 2/15/2021	Accepted 2/15/2021	Accepted 2/15/2021						

1 - 4 of 4 items

5. Search for the duplicate facility in question for transfer.
 - At the **Business Submittals** page, select **Facilities** link on the left menu bar.
 - Select the blue CERS ID in question.
 - Review the **Submittal History**. In the particular example; the **Submittal History** also shows this facility has 1 submitted submittal and none in the **Archived Submittal History**. Any pending draft submittals will not be reflected here, only in the Business portal.

Facility: Test Facility (CERSID: 10182611)
Home » Facility Search » Facility Summary: 10182611 » Submittal History

Summary
Submittals
Reporting Requirements
Compliance
Notifications
Manage Facility
Change UPA
Location Map

Submittal History for Test Facility

*Note: Submittal data is current as of 2/21/2022 at 12:00 AM.

CERSID	Address	Submitted	Facility	Inventory	Plans	UST	TP	RMR	Remote	Tank	APSA
10182611	Test Facility 1234 Main Ave Sacramento, 95838	2/19/2022 12:05PM	Submitted 2/18/2022								

1 - 1 of 1 items

Archived Submittal History for CERSID: 10182611

Submittals shown below were submitted by previous owner/operators of this facility.

CERSID	Address	Submitted	Facility	Inventory	Plans	UST	TP	RMR	Remote	Tank	APSA

No items to display

6. At the left menu bar, select **Manage Facility** link, then select the **Transfer Facility to Another Business** link.

Manage Facility: Test Facility (CERSID: 10182611)
Home » Facility Search » Facility Summary: 10182611 » Manage Facility

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Manage Facility
Change UPA
Location Map

Manage Facility

Transfer Facility to Another Business
Businesses can request, and regulators can approve (or perform) transferring a facility from one business to another. Facility Transfer requests from businesses typically occur when a new owner/operator of a facility claims an existing CERS ID (physical address) reported upon by a previous facility owner/operator. Facility transfers are also commonly used to consolidate a multi-facility business' facilities that were established in separate single-facility businesses (due to the CERS1 migration or other issues). Unless the regulator chooses otherwise, any submittals submitted by the previous facility owner/operator (CERS Organization) will be archived. In certain cases Cal/EPA may approve facility transfers involving many facilities for a multi-jurisdictional business.

Merge Facility into Another Facility of this Business
This can be used to eliminate duplicate facility records for the same business and address. Facilities can only be merged into another facility for the same business/organization. Use the Facility Transfer function to move and then merge facilities between businesses. Note: The facility being merged into another will be deleted in CERS and all of its submittals transferred to the destination facility--this action is irreversible. Any draft submittal data for the merging facility will be deleted.

7. At the **Facility Transfer** page, input **Organization Name (Organization 2) & Headquarters** then click the blue **Search CERS Organizations** button.

Facility Transfer: Test Facility (CERSID: 10182611)
Home » Facility Search » Facility Summary: 10182611 » Facility Transfer

Summary
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Location Map

Step 1: Select New CERS Organization for this Facility

Facility to Transfer
Facility Name: Test Facility
Facility Address: 1234 Main Ave, Sacramento CA 95838
Current Business Name: CalEPA Test Business Organization (Sacramento, CA)

Transfer to the Following Business/Organization
Please enter the name of the business (NOT facility) you wish to transfer this facility into.

Organization Name: OR
Headquarters:

Transfer to my CUPA's Non-Regulated/Not Applicable Facilities Organization
Use when 1) facility is no longer owned/operated by facility's current CERS Organization and new owner/operator's activities at the facility are non-regulated, or 2) new owner/operator is unknown.

Business/Organization Name	Headquarters	Facilities

No items to display

8. Once the **Business/Organization** is found, select the blue **Select** button next to the **Business/Organization Name**. This business organization has 2 facilities.

Facility Transfer: Test Facility (CERSID: 10182611)
Home » Facility Search » Facility Summary: 10182611 » Facility Transfer

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Change UPA
Location Map

Step 1: Select New CERS Organization for this Facility

Facility to Transfer
Facility Name: Test Facility
Facility Address: 1234 Main Ave, Sacramento CA 95838
Current Business Name: CalEPA Test Business Organization (Sacramento, CA)

Transfer to the Following Business/Organization
Please enter the name of the business (NOT facility) you wish to transfer this facility into.

Organization Name:
Headquarters: OR

Transfer to my CUPA's Non-Regulated/Not Applicable Facilities Organization
Use when 1) facility is no longer owned/operated by facility's current CERS Organization and new owner/operator's activities at the facility are non-regulated, or 2) new owner/operator is unknown.

Business/Organization Name	Headquarters	Facilities
Select CalEPA Test Business Organization	Sacramento, CA	2
Facility's Current Business: CalEPA Test Business Organization	Sacramento, CA	1

1 - 2 of 2 items

9. At the **Confirm Facility Transfer** page:
- Use the drop-down arrow to select **Regulator Approving Facility Transfer**.
 - Provide a reason why the facility is being transferred into the provided **Comments** box.
 - **IF** there are past submittals or any current draft. A checkbox will appear for selection to **Transfer Past Submittals (and any current drafts) to New Business/Organization (Organization 2)**. System will indicate the number of past submittals next to it.
 - **IF** it is determined that submittal history do not need to be transferred to the new facility, leave this box unchecked.

For this example, check the checkbox to **Transfer Past Submittals (and any current drafts) to New Business/Organization**. By checking this checkbox, all current submittals in the **Submittals History** will be transferred to the new business organization **Submittals History** section. If leave unchecked, the submittals will just transfer to the **Archived Submittal History** section.

Confirm Facility Transfer: Test Facility
Home » Facility Search » Facility Summary: 10182611 » Facility Transfer

Summary
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Notifications
Manage Facility
Change UPA
Location Map

Confirm Transfer: Test Facility

Confirm Facility Transfer details

Source Business/Organization: CalEPA Test Business Organization
Target Business/Organization: CalEPA Test Business Organization

Facility to be Transferred: Test Facility
1234 Main Ave Sacramento 95838

Regulator Approving Facility Transfer: California Environmental Protection Agency Partners

Comments: Duplicate facility created in error, transfer past submittals history box CHECKED.

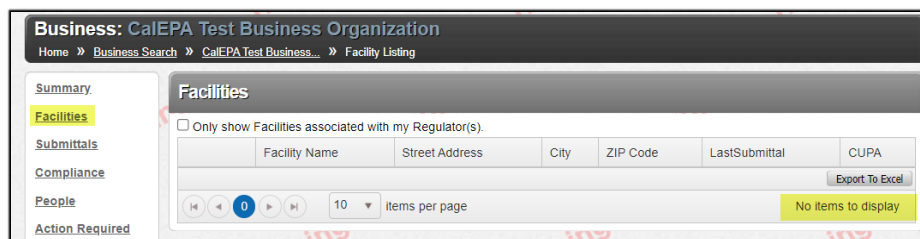
☒ **Transfer Past Submittals (and any current drafts) to New Business/Organization: 1**
submittal elements were previously submitted (or currently drafted) for this facility. Check this box only if you wish these past submittals to be transferred to the new Business/Organization. Normally a facility's past submittals should remain associated with the business (facility owner/operator) who submitted the reports.

10. Select the blue **Done** button at the **Facility Transfer Confirmation** page.



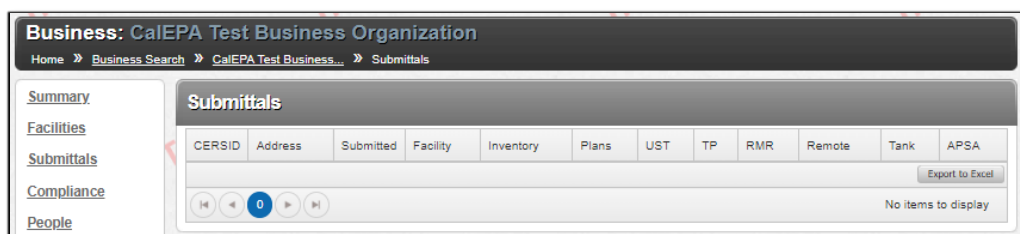
11. Review to ensure **DUPLICATE** facility (**10182611**) is no longer listed here in the **DUPLICATE** business organization (**Organization 1**).

- At the **CERS** Main page, menu bar on top, select the **Businesses** button, input the **Business Name**, select the blue **Search** button.
 - If it was the last facility of the business, change the **Status to Inactive** instead of leaving the default value of **Active**.
- Click the blue **Select** button next to the **Business Name**.
- At the **Business Summary** page, select the **Facilities** link on the left menu bar for facilities listing.
- At the **Facilities** page, review to ensure the facility (**10182611**) was transferred out successfully.



12. Review the **DUPLICATE** business organization (**Organization 1**) to ensure the facility submittals were also successfully transferred out.

- At the **Facility Listing** page, click the **Submittals** link on the left menu bar.
- **Submittals** page, review to ensure **DUPLICATE** facility (**10182611**) submittals no longer listed under **DUPLICATE** business organization (**Organization 1**), **Submittals** page.



13. Review the **Organization 2 (90016663) Submittals** page to ensure submittals for duplicate facility (**10182611**) were successfully transferred over since the checkbox was checked.

- At the main page, select the **Businesses** button at the top menu bar.
- Input the **Business Name** and click the **Search** button.
- Click the blue **Select** button next to the **Business Name**.
- The newly transferred facility should be listed under the **Facilities** section.

CERSID	Address	Submitted	Facility	Inventory	Plans	UST	TP	RMR	Remote	Tank	APSA
10182611	Test Facility 1234 Main Ave Sacramento, 95838	2/18/2022 12:55PM	Submitted 2/18/2022								
10181738	FTT Facility Transfer Test 10011 St Sacramento, 95814	10/5/2021 10:34AM	Submitted 10/5/2021	Submitted 10/5/2021	Submitted 10/5/2021						
10179983	Test Facility 1234 Main Ave Sacramento, 95838	8/27/2021 8:48PM	Accepted 8/29/2021	Submitted 8/27/2021	Submitted 8/27/2021						
10179983	Test Facility 1234 Main Ave Sacramento, 95838	6/2/2021 8:37PM	Certified 6/2/2021	Certified 6/2/2021	Certified 6/2/2021						
10179983	Test Facility 1234 Main Ave Sacramento, 95838	2/15/2021 7:00PM	Certified 2/15/2021	Certified 2/15/2021	Certified 2/15/2021						
10179983	Test Facility 1234 Main Ave Sacramento, 95838	2/11/2021 10:02AM	Accepted 2/15/2021	Accepted 2/15/2021	Accepted 2/15/2021						

14. Review the newly transferred facility's submittals:

- Under the **Facilities** section, select the blue **CERS ID** of the newly transferred facility.
- At the left menu bar, select the **Submittals** link to review facility submittals.
- Since the checkbox was checked, the **Facility Summary/Submittal History** page will show 1 submittal in the **Submittal History** section, but not in the **Archived Submittal History**.
- The submittal will be accessible by the business user.

Facility: Test Facility (CERSID: 10182611)
Home » Facility Search » Facility Summary: 10182611 » Submittal History

Summary
[Submittals](#)
[Reporting Requirements](#)
[Compliance](#)
[Notifications](#)
[Manage Facility](#)
[Change UPA](#)
[Location Map](#)

Submittal History for Test Facility
Note: Submittal data is current as of 2/22/2022 at 12:00 AM.
Export to Excel

CERSID	Address	Submitted	Facility	Inventory	Plans	UST	TP	RMR	Remote	Tank	APSA
10182611	Test Facility 1234 Main Ave Sacramento, 95838	2/18/2022 12:05PM	Submitted 2/18/2022								

1 - 1 of 1 items

Archived Submittal History for CERSID: 10182611
Submittals shown below were submitted by previous owner/operators of this facility.
Export to Excel

CERSID	Address	Submitted	Facility	Inventory	Plans	UST	TP	RMR	Remote	Tank	APSA
--------	---------	-----------	----------	-----------	-------	-----	----	-----	--------	------	------

No items to display

Now that both facilities are under the same organization, the duplicate facility (10182611) can now be merged with target facility (10178983) and not lose the submittal history made.

Merge Facility



Facility records must belong to the same Business/Organization before they can be merged. The duplicate facility that is being merged into the target facility will be deleted in CERS and all its submittals will be transferred to the target facility – this action is irreversible.

- At the **Home** page, select the **Business** button at the top menu bar. Search for Business/Organization. In this example, we will be using:
 - Business/Organization** - CalEPA Test Business Organization (90016663)
 - Merge **FROM (Duplicate Facility)** - Test Facility (10182611)
 - Merge **TO (Target Facility)** – Test Facility (10179983)

	Facility Name	Street Address	City	ZIP Code	LastSubmittal
10179983	Test Facility	1234 Main Ave	Sacramento	95838	08/27/2021
10181738	FTT Facility Transfer Test	1001 I St	Sacramento	95814	10/05/2021
10182611	Test Facility duplicate	1234 Main Ave	Sacramento	95838	02/18/2022

Export To Excel

1 - 3 of 3 items

- At the **Business Summary** page, **Facilities** section, click on the CERS ID to be merged, **Test Facility (10182611)**.
 - Left menu bar, select **Manage Facility** link.
 - Select **Merge Facility into Another Facility of this Business** link.

Manage Facility: Test Facility (CERSID: 10182611)

Home » Facility Search » Facility Summary: 10182611 » Manage Facility

Summary

Manage Facility

[Transfer Facility to Another Business](#)
Businesses can request, and regulators can approve (or perform) transferring a facility from one business to another. Facility Transfer requests from businesses typically occur when a new owner/operator of a facility claims an existing CERS ID (physical address) reported upon by a previous facility owner/operator. Facility transfers are also commonly used to consolidate a multi-facility business' facilities that were established in separate single-facility businesses (due to the CERS1 migration or other issues). Unless the regulator chooses otherwise, any submittals submitted by the previous facility owner/operator (CERS Organization) will be archived. In certain cases Cal/EPA may approve facility transfers involving many facilities for a multi-jurisdictional business.

Merge Facility into Another Facility of this Business
This can be used to eliminate duplicate facility records for the same business and address. Facilities can only be merged into another facility for the same business/organization. Use the Facility Transfer function to move and then merge facilities between businesses. Note: The facility being merged into another will be deleted in CERS and all of its submittals transferred to the destination facility--this action is irreversible. Any draft submittal data for the merging facility will be deleted.

- At the **Merge Facility** page, Source Facility (10182611) is to be merged/eliminated.
 - In the **Select Target Facility** section, select the blue **Select** button next to the CERS ID target facility (merge to).

- At the **Confirm Facility Merge** page, select the **Regulator**, input a **Comment** for the facility merge, and select the blue **Confirm** button.

- At the **Facility Merge Confirmation** page, select the blue **Done** button to complete the facility merge.

6. **CalEPA Test Business Organization (Organization 2)** no longer has the duplicate facility, CERS ID 10182611. Submittal History has been merged successfully and assumed the identity of CERS ID 10179983.

Facility: Test Facility (CERSID: 10179983)
Home » Facility Search » Facility Summary: 10179983 » Submittal History

Submittal History for Test Facility

*Note: Submittal data is current as of 2/23/2022 at 12:00 AM.

merged submittal

CERSID	Address	Submitted	Facility	Inventory	Plans	UST	TP	RMR	Remote	Tank	APSA
10179983	Test Facility 1234 Main Ave Sacramento, 95838	2/18/2022 12:05PM	Submitted 2/18/2022								
10179983	Test Facility 1234 Main Ave Sacramento, 95838	8/27/2021 5:49PM	Accepted 9/29/2021	Submitted 8/27/2021	Submitted 8/27/2021						
10179983	Test Facility 1234 Main Ave Sacramento, 95838	6/2/2021 2:57PM	Certified 8/2/2021	Certified 6/2/2021	Certified 6/2/2021						
10179983	Test Facility 1234 Main Ave Sacramento, 95838	2/15/2021 7:08PM	Certified 2/15/2021	Certified 2/15/2021	Certified 2/15/2021						
10179983	Test Facility 1234 Main Ave Sacramento, 95838	2/11/2021 10:42AM	Accepted 2/15/2021	Accepted 2/15/2021	Accepted 2/15/2021						

1 - 5 of 5 items

Archived Submittal History for CERSID: 10179983

Submittals shown below were submitted by previous owner/operators of this facility.

CERSID	Address	Submitted	Facility	Inventory	Plans	UST	TP	RMR	Remote	Tank	APSA
--------	---------	-----------	----------	-----------	-------	-----	----	-----	--------	------	------

No items to display

Unified Program Newsletter – September 2025

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State Water Board

Follow-Up Single-Walled UST Survey

On August 29, 2025, the State Water Resources Control Board (State Water Board) distributed follow-up surveys to Unified Program Agencies (UPAs) with single-walled underground storage tanks (USTs) in their jurisdiction. The survey requests additional information regarding red tag supplies and each UPA's specific enforcement plan for single-walled emergency tank systems and government owned tank facilities following the closure deadline. The State Water Board requests that follow-up single-walled surveys be submitted by September 12, 2025. The survey results will be posted on our [single-walled UST webpage](https://www.waterboards.ca.gov/water_issues/programs/ust/single_walled.html) (https://www.waterboards.ca.gov/water_issues/programs/ust/single_walled.html) and the data will be used to allocate resources. The State Water Board will be distributing red tag supplies soon based on the results of the upcoming survey.

For additional information regarding the single-walled UST surveys or red tag supplies, please contact:

Jenna Hartman at (916) 327-8563 or Jenna.Hartman@waterboards.ca.gov.

Tank Anchoring Systems and Buoyancy Calculations

The proposed Title 23, chapter 16 regulations will require anchoring on all tanks installed on or after January 1, 2027. Anchors must be designed to ensure that tank flotation does not occur after installation. The proposed regulations do not prescribe specific anchoring methods, only that the tank must be anchored to prevent flotation in accordance with the manufacturer, industry code or by engineering specifications approved by a California registered professional engineer.

Anchors are typically concrete blocks or pads with straps that connect to or hold down the UST. Tank manufacturers may provide concrete anchors, sized for the specific tank being sold, along with the required buoyancy calculations for the permit plan submittal as part of the installation plans. Owners or operators are not required to utilize the anchors provided by the tank manufacturer as other options are available. The State Water Board is aware of owners or operators utilizing an alternative method of anchoring while also providing the CUPA with the buoyancy calculations from the tank manufacturer that do not align with the actual anchoring method being installed. This inconsistency could result in inadequate protection from tank flotation.

Installing anchoring systems that were not designed or verified by the tank manufacturer can result in costly repairs for buoyant tanks and may also lead to non-compliance penalties. Repairing a floated tank can be nearly as costly as installing a new tank. Individuals performing plan checks should verify that the tank buoyancy calculations are consistent with the UST's anchoring system.

For additional information regarding anchoring systems on USTs, please contact: Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov.

Request to Submit Abstracts: 27th Annual CUPA Conference

The California Certified Unified Program Agency (CUPA) Forum is requesting abstracts for the 2026 CUPA Conference. Abstracts must be submitted through the [CUPA Forum website](https://calcupa.org/index.html) (<https://calcupa.org/index.html>) by September 26, 2025. Please note that speaker biographies must be submitted and approved prior to submitting an abstract.

The State Water Board recognizes that presenting at the conference is a significant commitment for both UPA management and the individual presenter. UPAs that meet their program obligations while also presenting at the CUPA Conference will be recognized for their outstanding achievements.

For additional information regarding abstracts for the 28th Annual CUPA Conference, contact: Jenna Hartman at (916) 327-8563 or Jenna.Hartman@waterboards.ca.gov.

DTSC

Now Available: Recorded Training – Implementation of the Generator Improvements Rule

The CUPA Training and Assistance Unit is pleased to announce that the “**Implementation of the Generator Improvements Rule**” training, which was delivered by DTSC at the 2025 CUPA Conference is now available as a recorded course on the CalCUPA Learning Management System (LMS). You can access the training here: https://calcupa.org/lms-course/index.html?moodle_course_id=98

This session provides step-by-step guidance on:

- Implementing the Generator Improvements Rule (GIR)
- Reviewing and applying new regulatory requirements

- Submitting renotification and closure notifications
- Meeting Quick Reference Guide requirements
- Establishing acceptable implementation arrangements with local authorities

Participants who complete the recorded course through the CalCUPA Learning Management System will also earn 1.5 Continuing Education Units (CEUs).

If you have any follow-up questions or would like to recommend future training topics, please contact us at dtsc_cupatrainers@dtsc.ca.gov.

EPA Updates Guide to Illegal Dumping Prevention

Illegal dumping, the disposal of waste in an unauthorized location, is a serious problem in many U.S. communities. Also referred to as “open dumping” or “fly dumping,” this action can threaten public health, safety, property values, and quality of life. The most common materials dumped in this way include construction debris, furniture, household appliances, auto parts, medical waste, yard waste, and household hazardous waste.

In June 2025, EPA updated the 1998 Illegal Dumping Prevention Guidebook, which outlines actions communities can take to prevent illegal dumping. The guide includes case studies from around the country that illustrate real actions taken by communities to prevent and respond to illegal dumping. [Visit EPA's webpage](https://www.epa.gov/large-scale-residential-demolition/illegal-dumping) (<https://www.epa.gov/large-scale-residential-demolition/illegal-dumping>) to download the guide and learn more about preventing illegal dumping and how to properly dispose of or recycle unwanted materials.

Cal FIRE OSFM

Aboveground Petroleum Storage Act (APSA) Advisory Committee

The next APSA Advisory Committee meeting will be held on October 15, 2025. The agenda will be available at least 10 days before the meeting on the APSA Advisory Committee website (<https://osfm.fire.ca.gov/committees/aboveground-petroleum-storage-act-apsa-advisory-committee>).

What to do if labels are missing or damaged on a welded steel storage tank?

Steel Tank Institute (STI) – Steel Plate Fabricators Association (SPFA) published an article addressing the question, ‘What to do if STI, UL (Underwriters Laboratories), or SwRI (Southwest Research Institute) labels are missing or damaged on a welded steel storage tank?’ Refer to the article on the STI/SPFA website at <https://stispfa.org/resource/what-to-do-if-sti-ul-or-swri-labels-are-missing-or-damaged-on-a-welded-steel-storage-tank/>.

The SP001 aboveground tank system inspector training will be held as follows:

- October 6-10, 2025 – Long Beach (full, waitlist available)
- November 17-21, 2025 – Denver, CO

For more information, visit the website at <https://stispfa.org/education/trainings-courses/sp001/>.

STI/SPFA also regularly holds free webinars that may be useful for APSA tank facility owners or operators. For more information, visit the website at <https://stispfa.org/education/webinars/>.

APSA Program Regulations Reminders for Tank Facilities

Recordkeeping – Training and Briefings

Excluding those conditionally exempt from preparing a Spill Prevention, Control, and Countermeasure (SPCC) Plan under APSA, each APSA tank facility is now required to maintain records of training and discharge prevention briefings for at least three years (California Code of Regulations (CCR), Title 19, Section 1611(a)(7)).

Electronic Reporting – APSA Facility Information

Each APSA tank facility, including conditionally exempt tank facilities, is now required to complete and submit the APSA Facility Information to the California Environmental Reporting System (CERS) in accordance with the CCR, Title 19, Section 1614. The APSA Facility Information must be completed and submitted to CERS within 12 months following December 17, 2024, and annually thereafter (CCR, Title 19, Section 1614(a)). The annual submittal of the APSA Facility Information shall be in conjunction with the tank facility statement or HMBP submittal (CCR Title 19, Section 1614(c)).

The APSA Facility Information is not the same as the Tank Facility Statement.

More information on CERS APSA submittals may be found on the following OSFM websites:

- Aboveground Petroleum Storage Tank Facility Statement Reporting Requirements
<https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act/aboveground-petroleum-storage-tank-facility-statement-reporting-requirements>
- Is My Facility Regulated Under APSA?
<https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act/is-my-facility-regulated-under-the-aboveground-petroleum-storage-act>
- Preparing an APSA Submittal in CERS
<https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act/preparing-an-aboveground-petroleum-storage-act>

References or links to information cited in this newsletter are subject to change. CalEPA is interested in your comments and suggestions regarding the Unified Program monthly newsletter. Please email your comments and suggestions to: cupa@calepa.ca.gov.

[CalEPA Unified Program Home Page](#)

Agenda Item IX

ARTICLES OF INTEREST

ENVIRONMENT

A Bay Area startup sold a plastic recycling dream. Neighbors call it just another incinerator



BY ALEJANDRA REYES-VELARDE
OCTOBER 7, 2025

Republish



Residents gather in front of Rohnert Park City Hall to protest the operation of Resynergi's microwave incinerator at 1200 Valley House Drive in Rohnert Park, on Aug. 26, 2025. They demanded that the city council revoke operating permits after the facility was red-tagged for violations of city-issued permits. Photo by Chad Surmick for CalMatters

IN SUMMARY

The Sonoma County company Resynergi says it will depart the state, just as Gov. Newsom sends CalRecycle back to the drawing board on potentially nation-leading rules governing plastic waste and plastic products.

The plan sounded like a magic bullet from the future to solve one of the world's most vexing environmental waste problems.

In Rohnert Park, just north of San Francisco, a startup company called Resynergi planned to use a form of “advanced recycling” to reuse plastic. Its process would chemically transform old plastic, blasting bits of it with microwaves until they turned into an oil that could then be used to make new plastic.

But the process – known as pyrolysis – was a hard sell to Sonoma County neighbors, who protested so much that the company withdrew its application and now plans to move out of state.

The fight that boiled over in Rohnert Park in recent months is a window into the tensions ahead for California as the state overhauls nation-leading regulations governing plastic pollution and packaging. (CalRecycle, formally known as the Department of Resources Recycling and Recovery, will hold a public hearing about those rules Oct. 7.)

While California is establishing some of the most forward-thinking plastic responsibility and recycling rules in the country, a dirty secret is that most plastic recycling methods are ineffective at best and illusory at worst.

Millions of tons of plastic go to the state's landfills each year, and millions more are shipped to Southeast Asia, where plastic is rarely recycled. Instead it is illegally dumped, and often burned.

Last year, Attorney General Rob Bonta brought suit against ExxonMobil for “perpetuating the myth ... that you can recycle plastics, including single use plastics, and that it's sustainable and good for the environment ... It's not true. It's a lie.” ExxonMobil has since countersued Bonta for defamation.

California's regulators, meanwhile, are working to implement a 2022 state law that moves the state toward a circular economy for plastic – by making companies that produce packaging and single-use plastic items responsible for what happens to them after people throw them away. Those companies, along with environmental groups, have been weighing in as CalRecycle has been writing regulations, now years in the making.

Recent comments by Gov. Gavin Newsom suggest the state is aiming to strike a balance, finding a way to encourage recycling companies while hitting the state’s goals – all while avoiding more air pollution or other environmental impacts.

As for Resynergi, local and environmental advocates say that the way local, county, and regional regulators handled the company points up the challenges the state will face as it regulates plastic and defines whether and how it can be recycled.

“It does make me nervous, since it took seven years to get any enforcement on a facility that’s a two hour drive from the Capitol,” said Nick Lapis, advocacy director for Californians Against Waste.

A credible solution to plastic waste?

Resynergi’s departure came as Sonoma County officials began to ask more serious questions about its operations, almost a decade after the company first arrived.

In 2017, company founder Brian Bauer chose Rohnert Park, a small, middle-class community surrounded by farmland, to develop and test his process.

He set up shop in a development called SOMO Village – a 200-acre neighborhood with homes, a high school, and commercial space. Developers market it as a climate-conscious place, built to be carbon-neutral, which Bauer said was a draw for Resynergi.

In early conversations, according to Bauer, Sonoma County officials “suggested” his business could follow simpler recycling guidelines. Sheri Cardo, a spokesperson for Sonoma County’s Department of Health Services, confirmed the department had talked with Bauer about its operations as a recycling research and development site, and that his characterization was accurate.

In 2023, when Bauer sought to expand operations, he approached the city of Rohnert Park’s planning division for permits.

Officials told Bauer his facility was considered a heavy manufacturing site, and that Resynergi’s location – 600 feet from a school – demanded an environmental review, according to documents obtained by residents through a public records request. In a response late last year, Resynergi argued that such a review could take too long, and moving quickly “could make or break substantial investment from a large strategic investor.”

Within a month, planning officials had flipped and were now siding with Resynergi, granting it a more flexible, less burdensome administrative use permit. The decision avoided additional public review.

But to operate legally, Resynergi had to secure approval from county officials and the regional air district.

In California, pyrolysis is classified as a type of incineration, associated with toxic and hazardous waste. Businesses must obtain a solid waste permit from local authorities, who enforce the state's public resources code. In the past, three facilities have received permits to use pyrolysis, two for the purpose of destroying medical waste. All are now closed, according to CalRecycle.

California counties issue waste permits on behalf of CalRecycle. The Bay Area Air District, formerly known as the Bay Area Regional Air Quality Management District, permits and controls pollution that microwaving plastic could produce.



Resynergi's microwave incinerator at 1200 Valley House Drive, in Rohnert Park, on Aug. 26, 2025. Photo by Chad Surmick for CalMatters

County officials started looking into the company when they realized Resynergi's plans would make the company a fully operational and "fixed component in the county's waste system," said Cardo, the county spokesperson.

"Although your facility might be considered a recycling facility in vernacular language, it is not under state law," [wrote](#) Christine Sosko, Sonoma County's director of environmental health.

CalRecycle spokesman Lance Klug said in an email that Sonoma County's response followed state standards.

But environmental advocates say the way city and county officials handled Resynergi reflects regulators' confusion about the processes for advanced recycling – confusion fueled by the plastic industry.

Jane Williams, director of California Communities Against Toxics, argues that federal and state law make it clear that pyrolysis facilities have to follow rules as incinerators. "It's really interesting for me to see, having worked on these incinerators for so long, how these guys pulled strings," Williams said. "They pulled whatever out of their pockets so they could convince people this is a recycling facility."

The American Chemistry Council, a trade group supporting the plastic industry, disagrees. And Resynergi's Bauer said he doesn't think his company's process counts as incineration.

"Communities across California and the country are searching for credible solutions to plastic waste," Bauer wrote in an open letter to the community. "This city has the chance to lead by example."

Community fears toxic air pollution

People living in and near SOMO Village found out that Resynergi planned to burn plastic on a larger scale when the Bay Area Air District notified the public of the company's permit application.

The community protested, filling city council rooms at each meeting and waving signs depicting polluting smoke stacks. Some parents spoke through tears to their city leaders. "Our air is not your experiment," one poster read.

Among the local opponents of Resynergi was Stephanie Lennox. She lives about 20 minutes from Rohnert Park in rural Forestville, but her two daughters go to Credo High School right next to the facility. She wondered about emissions and the risk of an explosion.

“My Lord, don’t we need a solution to our global plastic pollution,” Lennox said. “But my daughters’ lungs are not part of your beta testing phase for your ‘world’s global plastic solution.’”



Kirsten Van Nuys is hugged after addressing the city council at Rohnert Park City Hall to protest the recent operation of Resynergi’s microwave incinerator at 1200 Valley House Drive, on Aug. 26, 2025. Photo by Chad Surmick for CalMatters



First: Resynergi's microwave incinerator at 1200 Valley House Drive, in Rohnert Park. **Last:** Annabelle Royes, 9, stands in front of Rohnert Park City Hall to protest the operation of Resynergi's microwave incinerator on Aug. 26, 2025. Photos by Chad Surmick for CalMatters

Local organizers said they wanted city and county leaders to follow state law and the federal Clean Air Act.

When plastic is burned, additives like flame retardants or other chemicals that don't break down can create toxic emissions, said Veena Singla, a researcher at the University of California San Francisco.

Resynergi applied to the regional air district to obtain a permit for pollution control equipment in April, after the company had already begun operating their technology.

In August, the air district issued three notices of violation to Resynergi for constructing and operating without a permit.

Bauer admitted to operating the equipment without a permit. The company never burned plastic in Rohnert Park he said; it did burn plastic at “prototype levels” in Santa Rosa.

But, Bauer added, Resynergi was trying to follow the rules as he understood them. As a startup, he said, “you don’t even know if you will get a prototype to work. You’re also trying to figure out how the permitting process works.”

Millions spent to sway regulations

Resynergi’s departure wasn’t because of a community outcry, Bauer said. The turning point, he said, was “the pull from other states; how they treated climate technologies such as ours ...combined with the overall culture of accepting what we’re doing.”

Plastics manufacturers and industry advocates like the American Chemistry Council have campaigned to redefine terms and loosen environmental regulations for the process Resynergi is developing. After the lobbying, 27 states have reclassified pyrolysis as manufacturing instead of solid waste operations, said Davis Allen, a researcher for the Center for Climate Integrity. That classification helps operators get around federal air requirements, he added.

Resynergi’s Bauer told CalMatters that “one of those (states) is a candidate,” and that the company will move out by the end of the year.

An analysis by the climate accountability newsletter [HEATED](#) found the chemistry council and groups aligned with it have spent as much as \$30 million to promote the concept of advanced recycling as a mainstream and established one. That language aims to sway not just state laws, but federal clean air policy as well.

Between 2021 and 2022, when lawmakers were discussing plastic producer legislation, the American Chemistry Council spent more than \$1.6 million on lobbying state legislators, [according to publicly available data](#) published by the Secretary of State.

The American Chemistry Council’s Ross Eisenberg says that pyrolysis and other chemical recycling processes do work. These processes turn “hard-to-recycle plastics into the raw materials for high-quality products while reducing greenhouse-gas emissions and fossil energy use during production compared with virgin production,” he said.

“America’s plastic makers are investing billions of dollars to modernize and expand recycling capacity and improve efficiency,” Eisenberg said, adding that the companies are “advocating for smart policies that enhance collection and sorting so more plastics can be remade into new products.”

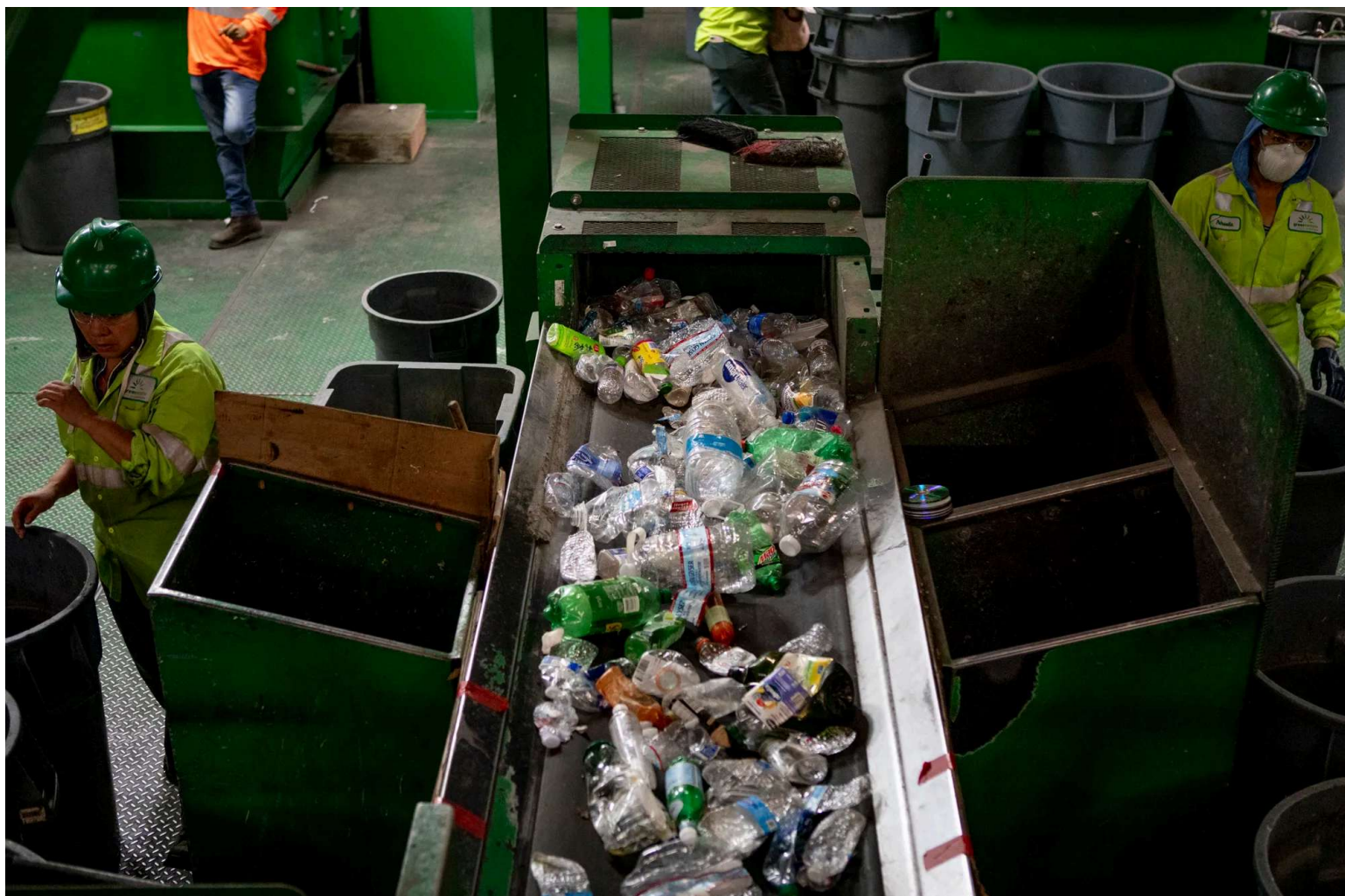
This year, the Environmental Protection Agency said it [isn’t taking further action](#) on the matter, but industry representatives said they’ll continue to lobby at the federal level.

Ambitious rules and tough realities for plastic

California’s goals to reduce plastic pollution and make producers responsible for plastic waste are ambitious in size, scope, and speed. Within seven years, state law seeks to reduce plastic packaging by 25%, make single-use plastic packaging 100% recyclable or compostable, and divert most of that packaging into recycling.

Allen, from the Center for Climate Integrity, says laws like this can be a good idea – as long as regulators focus more on reducing plastics and less on recycling them.

“Almost any solution that is based on the idea that plastics can widely be recycled just isn’t really going to work,” Allen said. “There just aren’t easily available solutions to a lot of the problems that limit the effectiveness of recycling.”



Single-use plastic bottles on a conveyor belt at greenwaste recycling facility in San Jose on July 29, 2019. Photo by Anne Wernikoff for CalMatters.

But in March, regulations aimed at achieving the state’s goals were dealt a setback after two years of hearings. The day they were due, Gov. Newsom directed CalRecycle to start the regulatory process over.

The governor asked for changes “to minimize costs for small businesses and families – while ensuring California’s bold recycling law can achieve the critical goal of cutting plastic pollution,” said Daniel Villaseñor, a spokesperson for the governor, in an email to CalMatters.

The Plastics Industry Association and the American Chemistry Council hailed the governor’s announcement as an opportunity. “We believe California’s regulations should be clear, technology-neutral, and performance-based,” said the council’s Ross Eisenberg.

According to Klug, the CalRecycle spokesman, the state “remains committed to fostering business innovation that promotes a safe and clean future for all Californians.”

But environmental organizations like the Monterey Bay Aquarium and Surfrider called the decision disappointing.

Williams, the California Communities Against Toxics activist, said she's concerned that more recent draft language may encourage pyrolysis facilities like Resynergi, which, she says, don't belong in the state.

If California "rolls out the red carpet," she said, "The only thing that will stop a whole new fleet of incinerators being built in California now is open, persistent community opposition."

Resynergi also took part in CalRecycle workshops for the regulations. The company's departure announcement praised the "innovative spirit of California ... instrumental in the company's growth."

Brian Bauer said he's hopeful the state plastic regulations will ease regulations for companies like his, but he plans to return to California either way.

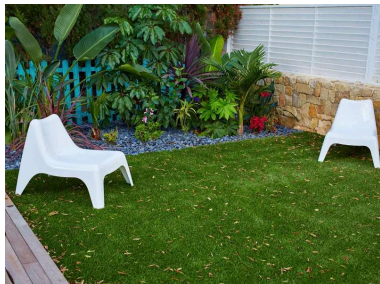
"So it might be a couple years," Bauer said. "We'll be back to California in due time."

READ NEXT



Deal pulls California plastic trash measure from ballot

JUNE 28, 2022



Advanced recycling is booming except in California. A new plastics law is to blame

NOVEMBER 3, 2022

California EPR stakeholders keep pushing through regulatory gray area

A turbulent year of rulemaking has discouraged some members of the SB 54 advisory board. Circular Action Alliance says companies should engage now to be ready for a quick launch.

Published Oct. 7, 2025

By Marissa Heffernan

A bale of plastic material collected for recycling. California's SB 54 law, which will launch an extended producer responsibility program for packaging, has yielded a complex rulemaking process. Alamy

After a roller coaster of a year, those involved with rulemaking on packaging extended producer responsibility in California remain hopeful that a successful program can still emerge.

Up against a key regulatory deadline in March, Gov. Gavin Newsom rejected draft EPR rules language, effectively sending the SB 54 regulatory process back to the starting line. A second round of formal rulemaking opened on Aug. 22. Now, CalRecycle is holding a public hearing on Tuesday to close out the first public comment period.

Though the majority of the regulations remained the same, added language around product exemptions and chemical recycling drew concerns from various groups. The new regulations also simplified the reuse and refill section, which stakeholders applauded at a May workshop.

SB 54: Next steps

Oct. 10, 2025

The 45-day comment period for the new Draft Program Environmental Impact Report ends.

Nov. 15, 2025

Producer reports on 2023 data are due.

Jan. 1, 2026

Needs assessment to be published.

January 2026

CAA opens its reimbursement application portal.

June 15, 2026

Deadline for CAA to submit its program plan.

Jan. 1, 2027

Program implementation begins.

Shane Buckingham, chief of staff at producer responsibility organization Circular Action Alliance, said while there is program implementation work that cannot be finished without the regulations in place, there's also plenty to do ahead of the PRO's program plan due next year.

"We've been focused on ensuring that we can develop the program plan, consult on the program plan and submit it on time," he said, adding that "of course, we are having to make certain assumptions because the regulations are not yet completed."

CAA is wrapping up information collection projects on reuse and refill, compostable packaging, source reduction, the

reimbursement framework, education and outreach and environmental justice that started earlier this year in the state.

The PRO will hold a series of webinars through the end of the year presenting the findings and to get more feedback from interested parties. Data collection from producers is another major focus for CAA right now, as that's the base for budget and fee development.

Buckingham said producers are asking for certainty around what kind of data they will need to report, and CAA has been providing as much guidance as it's able to, without regulatory aspects such as de minimus determinations in place.

Those de minimus determinations will direct the level of detail producers have to report for small amounts of materials – for example, if a plastic liner in a metal can will need to be reported separately. CAA has also published preliminary early fee ranges so producers can start to budget for the amount the law requires them to pay in program start-up costs.

“It's really important for producers to work with us now to get their data prepared because of how quickly next year could move,” Buckingham said. “We don't know exactly when the regulations will be completed, but the current provision in the regulation is to have producers report their 2023 data 30 days after the effective date [of the regulations]. That's a very quick turnaround.”

A complex process

Joanne Brasch, California Product Stewardship Council's director of advocacy and outreach, said stakeholders who have been involved in EPR program implementation before for other product categories were not surprised by the time it's taking: “These are really long, drawn-out processes.”

In addition, some of the issues being raised in the rulemaking were apparent from the start, she said, such as the questions around scope. CPSC's position is that it's time to approve the current regulations and just move forward.

"It's more important to get the program running, even if it doesn't have the cleanest scope, because a lot of what EPR does is data tracking and information sharing," Brasch said, adding that "I think everyone just knows that cleanup legislation will be needed."

Members of the SB 54 advisory board emphasized the uncertainty that the last year has brought, but affirmed their dedication to seeing the program succeed.

Timothy Burroughs, executive director of StopWaste and a member of the advisory board, said while he believes "as strongly as ever in the intention of SB 54 to shift the responsibility to the producers" for packaging management, "what's also true is the regulatory process over the past year has been tumultuous and also sometimes disenchanting — and I do have remaining concerns about the current draft regulations."

Rachel Michelin, president and CEO of the California Retailers Association, is also a member of the advisory board. While Michelin wants to see the program be successful, she worries about the impact of the complex requirements on small businesses as well as the interplay between SB 54 and other related laws. She also sees the 16-member advisory board as an obstacle.

"I don't think the process is working," Michelin said, adding that she believes sending the draft regulations back to be redone was the right thing to do, as they're so complex that small retailers are turning to ChatGPT. Even national retailers, with attorneys and other resources, are struggling to understand them, she said.

“When people get frustrated their reaction is just ‘I’m not going to do that,’ and that’s not what we want,” she said. “We want this to work, but it’s become so complicated.”

Michelin said the advisory board is another problem, as she feels that it’s not operating in a way that provides value. In addition, “there have been things that have been said about the business community that have been very offensive to my folks,” and she would prefer that the board focuses more on education and on making the puzzle pieces of various EPR laws fit together.

“We’re not looking at all these programs and how we can make them work together, which would actually reduce cost,” she said, and that’s something the advisory committee is well positioned to do: “Let’s get out of our silo of 54 and talk about the entire ecosystem.”

Burroughs said the amount of debate around SB 54 shows how consequential it is.

“The level of debate and discourse is really an indication of its potential benefits and potential impact,” he said, adding that he believes the conversations at the advisory board will lead to stronger outcomes.

The active lawsuit in Oregon over the constitutionality of that state’s packaging EPR program is also front of mind for those involved in SB 54’s implementation. Michelin said if the plaintiffs are successful, “it’ll be a nanosecond before they do it in California,” and “it will send shockwaves through everything.”

She worries all the work that’s already been done will be thrown out, when “we need to figure out how to salvage it and move forward.”

CalRecycle wasn’t available to comment prior to publication.

What's next

Looking forward, Michelin said one milestone will be the release of the fee structure, and “I think people are going to be a little shocked by that.”

She also hopes that the regulations are finished by the end of the year, so everyone can focus on education and implementation, as well as exploring possible legislative fixes to the areas that can't be addressed via rulemaking.

Burroughs agreed that the next big milestones are finalizing the regulations and the PRO plan, as well as the start of payments into the Plastic Pollution Mitigation Fund in 2027.

Buckingham encouraged interested parties to participate in the upcoming webinar series, and noted that CAA is building up its team in preparation for the push to the finish line. As for the regulations, “we just want to ensure that we can proceed, that we can move forward and start to create more stability, predictability and certainty on how we will be implementing” SB 54.

“It really does require that regulatory clarity, and I think that it's in everyone's interest to see that through and get to the completed regulations early next year,” he added.

DIVE BRIEF

8.5M tons of packaging entered California landfills in 2024: CalRecycle study

The study, mandated by state EPR regulations, sheds light on how materials covered under the program might be diverted in the future.

Published Oct. 3, 2025



Megan Quinn
Senior Reporter

Mixed recyclable materials sit on a tipping floor at Recology's Recycle Central in San Francisco, California. A CalRecycle study showed more than 8.5 million tons of single-use packaging and food ware entered California landfills last year. Justin Sullivan via Getty Images

Dive Brief:

- Californians threw away nearly 8.5 million tons of single-use packaging and food ware in 2024, according to an updated material characterization study CalRecycle published on Tuesday.
- Last year, about 40 million tons of total material went to landfills. About 21% percent of that was material that will eventually be covered under California's extended producer responsibility for packaging law, known as SB 54, according to the study.
- The study was meant to measure how much EPR-related "covered material" ends up in landfills, CalRecycle said, such as hair spray cans or pasta sauce jars. That gives insight into how

much of that material might be diverted in the future once the EPR program takes effect in 2027.

Dive Insight:

Waste diversion is a major facet of SB 54, the sweeping EPR for packaging law that passed in 2022. SB 54 particularly aims to reduce the amount of certain single-use packaging and plastic single-use food service ware, known as covered material, from entering California landfills.

The law also requires an overall reduction of such packaging, along with requirements to make covered materials recyclable or compostable by 2032.

California first created its covered material list in 2024 and periodically updates it with more types of packaging and products that producers will be responsible for collecting and recycling or composting.

CalRecycle, working with Cascadia Consulting Group, gathered data from 16 landfills in the state between February and April 2025. The extrapolated data aims to provide an overall estimate of statewide disposal trends. The groups sampled landfills run by county operators as well as Republic Services, WM, Waste Connections and Recology, according to the report.

CalRecycle found that the most significant categories of covered materials in landfills were plastic and paper items. The largest proportion of this material is cardboard, making up about 5% of the material sampled, the agency estimates. Flexible and film plastics of various plastic types were another common category, the report said.

As part of the ongoing implementation process for SB 54, CalRecycle was required to conduct this study on landfilled

covered materials.

The agency sampled waste that came to the landfill from various “sectors,” such as franchised single-family residential sources, franchised commercial and multifamily residential sources, and “self-hauled” and transfer trailer sources, according to the study.

CalRecycle first published its preliminary findings on June 30, but the agency said its revised report published Sept. 30 offers more advanced statistical analyses on the data.

Estimated disposal of covered materials in California landfills

CalRecycle conducted a material characterization study to measure how much of each material covered under the state EPR for packaging law ends up in landfills each year.

Covered material category	Annual disposal estimate (tons)	Percentage of total estimated covered material disposed	Highest tonnage of covered material in category
Paper and fiber	3,929,375	46.5%	Cardboard
Plastic	3,123,797	36.9%	Flexible and film items
Wood and other organics	811,999	9.6%	All untreated forms
Metal	432,265	5.1%	Non-aerosol containers
Glass	154,149	1.8%	Bottles and jars



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Sacramento

FOLSOM BEGINS CURBSIDE BIN CHECKS TO BOOST RECYCLING EFFORTS FOLLOWING CALIFORNIA REGULATIONS

By David Lee

Published on October 08, 2025



Residents of Folsom, it's time to check your bins. Starting next week, the City of Folsom's Waste and Recycling Division will be peeking into your trash, literally.

This isn't a new program but an integral part of the city's annual Route Review program which aims to inform and guide residents on proper waste sorting as per California's recycling regulations.

Specifically, the state's Senate Bill 1383 and the local Folsom Municipal Code require residents to meticulously sort recyclables, organics, and garbage into the right bins.

City staff will be undertaking these spot checks by simply lifting the lids of curbside bins and having a

quick look to ensure that the division of waste is clear and correct.

In an effort to encourage and educate rather than punish, they might even leave a friendly "Keep up the Good Work" tag if you're on the right track, but get ready for an "Oops" tag if things aren't quite right.

However, if there's over 10% of contamination seen, the "Oops" tag will politely tell you where you went wrong, according to the official [City of Folsom announcement](#).

The city staff assigned to this task will be easy to spot, geared up in high-visibility vests and wearing official IDs, and working in pairs for efficiency and safety. So if you see them early in the morning between 7 and 9 a.m., worry not, they are just the bearers of good recycling habits.

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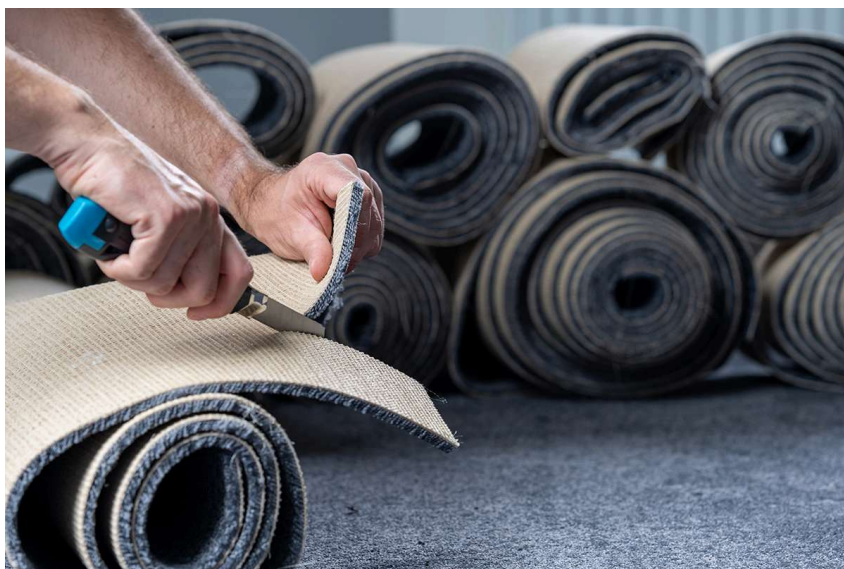
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California's 2024 carpet recycling rate exceeds annual goal

Published: September 17, 2025

Updated: September 17, 2025

by [Stefanie Valentic](#)



The market for recycled carpet in California continues to scale, boosted by supplemental subsidies and infrastructure improvements. | FrankHH/Shutterstock

California's carpet recycling rate has improved for the fifth consecutive year, with Carpet America Recovery Effort (CARE) citing financial incentives, including grants, as a key driver of the continued growth.

This progress aligns with compliance to the state's Carpet Stewardship Law, as outlined in Assembly Bill [2398](#), AB [1158](#), and AB [729](#). In September 2024, state legislators passed AB [863](#), which further revised the program to include a carpet-to-carpet recycled content mandate of 5% by 2028, required sorting at an approved collection site by 2029 and set reimbursements while changing the recycling formula.

"Our efforts at growing collection, reuse, recycling and innovations in market development have paid off," said Bob Peoples, CARE executive director. "Recyclers have collected more than 1.3 billion pounds of old carpet in California since the program started."

He further noted that 2025 already is exceeding recycling targets, "despite the toughest market conditions since the financial crisis of 2008."

The distribution of supplemental subsidies has strengthened the [carpet market](#) and its supporting infrastructure. These grants are part of CARE's ongoing efforts initiated in the March 2020 COVID-19 Action Plan, which focus on improving recycling in the state.

A total of [15 grants](#), amounting to \$881,000, were awarded to 14 entities to enhance collection networks and research fiber identification and difficult-to-recycle post-consumer carpet (PCC) components.

In 2024, 82.7 million pounds of carpet [were collected](#), an increase from 78.9 million in 2023. The recycling efficiency rate reached 90.5%, up from 83.7% in the previous year. The program achieved its highest annual recycling rate to date at 38.5%, gradually increasing from 20.9% in 2020 when it started. This rate exceeds the 2024 goal of 34%.

In addition to providing grants, CARE increased the number of drop-off sites to 159, opening 16 new locations in 2024. The program services all 59 counties in California, with one site available for every 450,000 residents in each county, according to the organization.

As the market for recycled carpet continues to grow, so do employment opportunities, with CARE reporting that more than 680 jobs support the industry. The report indicated that the program surpassed its goals for carpet reuse and for the number of products made from PCC, while also reducing carpet disposal.

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The latest plastics recycling news

[ADS recycled plastic purchase share sinks to 3-year low](#)

Major buyer Advanced Drainage Systems reached its lowest level of recycled plastic purchases since its fiscal 2022 baseline, according to its annual sustainability report.

[Colorado approval signals path forward for PRO choice](#)

Although a designated producer responsibility organization (PRO) receives much of the attention for any state's emerging extended producer responsibility (EPR) plan for packaging, independent PROs quietly address more specialized needs.

[Glacier AI at Penn Waste aims to improve PET, fiber output](#)

Glacier, the Amazon-backed AI and robotics company, has installed its sorting technology at Penn Waste's MRF in York County, Pennsylvania, in a project supported by Cox Enterprises that aims to lift plastic recovery and improve fiber quality for mills.

[French incentives spur restart on work for recycling plant](#)

Recycling technology company Carbios will restart construction on its enzymatic PET recycling plant in Longlaville, a move attributed in part to French governmental incentives. The so-called biorecycling plant is expected to start production in the second half of 2027.

[APR launches recyclability assessment platform](#)

The Association of Plastic Recyclers will launch a new digital platform to help brands and packaging suppliers evaluate the recyclability of entire plastic packages and prepare for policy requirements in the US and abroad.

[Top stories from September 2025](#)

The sudden inclusion of PET resin into hefty tariffs drew reader interest in

The organization has outlined a [12-point strategy](#) through 2027 aimed at further increasing carpet recycling rates and infrastructure. This plan includes a target of reaching a 45% recycling rate by 2027.

Key objectives of the plan include enhancing recyclability and growing the market for products made from post-consumer carpet. CARE aims to improve collection rates to 60% by 2027 through the expansion of drop-off infrastructure. The roadmap also targets an annual recycling efficiency rate of 75% through 2026 while building capacity and ensuring that 90% of California residents are within 15 miles of a location accepting carpet from flooring contractors by the end of 2027.

A version of this story appeared in [Resource Recycling](#) on Sept. 16.

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September, as well as the existential crisis facing European recyclers, a chemical recycler's relocation plans and the use of chemically recycled PE in specialty films.

Resynergi moving operations out of California

Chemical recycling startup Resynergi will move its operations from northern California to another state "to scale the technology and meet growing demand," according to a September 25 press release.

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