



Rural Counties
Environmental Services
Joint Powers Authority

ESJPA

Board of Directors Meeting

**Thursday
December 11, 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, December 11, 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/88555295534>

Enter Password: 789948

2. Call-in and listen to the meeting:

Dial (877) 853-5247

Enter meeting ID: 885 5529 5534

Passcode: 789948

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.

II. Business Matters

Discussion and possible action related to the following:

- A. Approval of Minutes from the Meeting of October 16, 2025 **(ACTION)** – Supervisor Lori Parlin, ESJPA Chair. *(pgs. 2-6; 5 minutes)*
- B. Election of the 2026 ESJPA/TAG Chair and Vice Chair **(ACTION)** – Staci Heaton *(pgs. 7; 10 minutes)*
- C. Review and approval of the 2026 ESJPA Budget **(ACTION)** – Milena De Melo, Finance Director, RCRC . *(pgs. 8-11; 10 minutes)*
- D. Consideration and Approval of the 2026-28 ESJPA Business Plan **(ACTION)** – Staci Heaton and Christopher Egan, RCRC Management Analyst *(pgs. 12-14; 10 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

- Senate Bill 501 (Allen)
- Assembly Bill 1325 (Rodriguez)
- NOx Cylinders

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

VIII. Solid Waste/Regulatory Update

Discussion and possible action related to the following:

A. Federal Update – Staci Heaton (5 minutes)

B. CalRecycle (30 minutes)

- a. SB 54 Implementation – John Kennedy, and Larry Sweetser, Sweetser and Associates (pgs. 16-63)
- b. SB 1383 Implementation – Larry Sweetser and Staci Heaton
- c. Illegal Dumping – Larry Sweetser (pgs. 64-102)
- d. Dealer Co-op Stewardship Plan – Larry Sweetser
- e. Waste Characterization Study – Larry Sweetser
- f. Embedded Battery Standards (SB 1215) – Larry Sweetser (pgs. 103-114)

B. California Air Resources Board

- a. Landfill Methane Regulations Update – John Kennedy and Larry Sweetser (pgs. 115-128; 20 minutes)

C. Department of Toxics Substances Control (10 minutes)

- a. Hazardous Waste Management Plan – Larry Sweetser (pgs. 129-131)
- b. 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
- c. Household Hazardous Waste Grants – Larry Sweetser

E. Highlights of November 2025 CalRecycle Monthly Meeting – Larry Sweetser (pgs. 132-153; 10 minutes)

F. Other Regulatory Announcements/Issues of Interest

- Cal EPA CUPA Newsletters (pgs. 154-170)

G. Agenda Suggestions, Member County Presentation Volunteer, Workshop Topics for Next ESJPA Board Meeting Scheduled March 26, 2026

IX. Articles of Interest

(Page 171)

X. Adjournment

Lunch Break

Technical Advisory Group Breakout Session 1 p.m.

Electronic Verification Questionnaire (eVQ) Completion

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)

| | |
|---|--|
| 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 |
| Tehama County Solid Waste Management Agency Administrative Office 20000 Plymire Road Red Bluff, CA 96080 | |

Agenda Item II

BUSINESS MATTERS



**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 Meeting Minutes**

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

Thursday, October 16, 2025

VOTING MEMBERS PRESENT

Jeff Gardner
Valerie Meza
Tedd Ward
Supervisor Lori Parlin
Jose Castaneda
Supervisor Rhonda Duggan
Sean Graham
Narcisa Untal
Paul Freund
Diane Rader
Deborah Reagan

Amador County
Butte County
Del Norte County
El Dorado County
Imperial County
Mono County
Plumas 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

Emily Coven, Circular Action Alliance
Melissa Vargas, CalRecycle
Joanne Brasch, California Product Stewardship Council
Heidi Sanborn, National Stewardship Action Council
Christine Messer, Mattress Recycling Council
Terri Marsman and Arielle Lewellyn, PaintCare
Lisa Mekis, Carpet America Recovery Effort

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

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

Supervisor Lori Parlin, ESJPA Chair, called the meeting to order at 9:10 a.m. A quorum was determined at that time.

- B. Special Presentation – Emily Coven, Circular Action Alliance

Ms. Coven gave an overview of CAA and discussed the status of their SB 54 implementation activities. She noted the investments CAA would be making in infrastructure to facilitate their efforts to lessen the use of single-use plastics. She also encouraged members to attend the upcoming CAA webinars and submit the questionnaires they have sent out to help inform their efforts. She expressed that CAA hopes that everyone will take advantage of this opportunity.

Members and ESJPA expressed concerns around reimbursement, CalRecycle enforcement provisions, and how remote areas within jurisdictions comply with the new requirements.

II. Business Matters

- A. The Board considered minutes from the meeting of August 14, 2025 for approval. Sean Graham, Plumas County, noted that she was in attendance at the August meeting, but was not captured. Motion/Second to approve the minutes with the amendment 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 asked the Board for recommendations on the draft 2026-28 ESJPA Business Plan, which was included in the packet. Recommendations included adding “coordinating multiple member efforts under grant programs” to organizational health, as well as adding the Blue Strike project to “Increased Visibility.” Supervisor Parlin suggested taking video at tours for use in advocacy and membership building efforts.

- C. Consideration and Approval of the 2026 ESJPA Board of Directors Meeting Calendar

The Board considered the proposed 2026 ESJPA Board of Directors Meeting Calendar for approval. Motion/Second to approve the calendar by Mono County/Butte County. Motion approved unanimously.

III. Public Comment

None noted.

IV. Presentations

A. Report from CalRecycle

Melissa Vargas, Local Assistance and Market Development Branch, noted the next SB 1383 chat would be held on November 19 at 1-3 p.m., with a focus on large venues and events. Recordings of previous chats are available on the CalRecycle YouTube channel. Ms. Vargas announced several open grant cycles, and included the dates and deadlines in her ESJPA report. She also noted that the next SB 54 Advisory Board would occur on Oct. 17, and the next Illegal Dumping Technical Advisory Committee meeting on November 5.

V. Member County Concerns/Comments

Deborah Reagan, Tuolumne County, noted that Chinese Camp burned to the ground in the TCU Complex Fire and expressed difficulties with debris management planning.

VI. Legislative Update

(Supplemental Packet)

(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

John Kennedy, RCRC Senior Policy Advocate, updated the Board on Governor's actions on specific solid waste, recycling, and EPR legislation, including Assembly Bill 28 (Schiavo), Assembly Bill 998 (Hadwick), and Senate Bill 501 (Allen).

VII. Extended Producer Responsibility

- California Product Stewardship Council Update

Joanne Brasch, Director of Advocacy and Outreach, noted that none of their bills passed this year and that they didn't expect the carpet bill to be held. She noted that the vape bill will be resurrected with language going into January. On the solar panels bill, stakeholders couldn't agree on EPR language, so CPSC stepped back into a technical advisory role.

- National Stewardship Action Council Update

Heidi Sanborn, Executive Director/CEO, noted that NSAC is working with ESJPA on the vapes issue and that they want to work on banning sale of flavored nitrous oxide. Nebraska banned sales of any vapes that look like other products (sippy cups, highlighters, etc.). NSAC is not confident about getting signatures based on what was vetoed this year, but will continue working on marine flares.

- Mattress Recycling Council Update

Christine Messer, Northern California Program Director, announced that MRC hopes to add 3 sites in Lassen County, in the more remote parts of the county. MRC lost a site in Sutter County, but are hoping to add a site back into Sutter. El Dorado Disposal can now collect year-round. She noted that they have

illegally dumped mattress pilot funding available, with applications open until Nov. 14th.

- **PaintCare Update**

Terri Marsman and Arielle Lewellyn, PaintCare, introduced Arielle as the new program coordinator for northern portion of the CA region. She will be visiting facilities in our jurisdictions. They also announced a new facility at Dixon Hardware in Solano County.

- **Carpet America Recovery Effort**

Lisa Mekis, California Senior Associate, noted that the carpet recycling rate in CA is currently just under 40%, whereas elsewhere in the U.S. without EPR it's just 4%. Around 80% of population is within 5 miles of public drop off site. CARE is happy to set up additional sites to create redundancy, particularly in rural counties. Also happy to give presentations/schedule meetings in regions. CARE has also created ordinance language and jobsite language to help contractors handling their clients. They are currently focusing on requirements of AB 863. They are also surprised with suspension of AB 880. Volume of carpet tile that's being reused is increasing. Put into schools, community centers, training centers, etc.

VIII. Solid Waste/Regulatory Update

A. Federal Update

Ms. Heaton noted that the federal government is still shut down due to the lack of continuing budget resolution. She requested that members let her know if any issues arise from public lands not being manned/managed.

B. CalRecycle

a. SB 54 Implementation

Mr. Kennedy updated the Board on the development process of the new SB 54 regulations. Mr. Sweetser noted that the Advisory Board meets on the 17th. CAA surveys aren't geared toward rural areas. If anything new is added to the program as covered materials, jurisdictions have one year to add it to the program. He encouraged members to go through the category list and make sure all of those things are materials they're willing to accept. Hauler should be going directly to CAA, not coming to jurisdictions for payment.

Other items were noted to have been covered or will be covered in the TAG session.

B. California Air Resources Board

a. Landfill Methane Outreach Update

Mr. Sweetser noted that ESJPA has doing a lot of work on the regulations. Mr. Kennedy encouraged members to communicate to us if there is anything in the regulations that is not feasible.

C. Department of Toxics Substances Control

a. Hazardous Waste Management Plan

No updates of note.

b. Safer Consumer Products

Mr. Sweetser noted that if a producer can't justify including an ingredient, they have to get rid of it. Cost of justification usually outweighs the benefit of including the ingredient.

c. Program Updates – Larry Sweetser

Mr. Sweetser reminded members that failure to submit eVQ report can result in fines.

D. Grant Program and Contracts Update

a. CalRecycle Rural Zero Waste Plan

Larry Sweetser and Jason Hansen, RCRC Economic Development Officer, noted that we would be gathering information in the afternoon TAG session.

b. ESJPA Ongoing and Potential Grants – Larry Sweetser

Mr. Sweetser noted that ESJPA grants are ongoing and that TA7 is coming this month.

E. Highlights of August-October 2025 CalRecycle Monthly Meetings

Mr. Sweetser reminded the Board that the covered battery program proposing embedded battery devices will have sales increase.

IX. Adjournment

The meeting was adjourned at 12:38 p.m.



MEMORANDUM

To: ESJPA Board of Directors

From: Staci Heaton, ESJPA Deputy Executive Director

Date: December 4, 2025

RE: Election of ESJPA and TAG Chair and Vice Chair (ACTION)

The ESJPA Joint Exercise of Powers Agreement specifies that the Board shall elect its Chair and Vice Chair “from among its properly designate Delegates...who shall serve a term of one year or until their respective successor is elected.” Our current Chair is Supervisor Lori Parlin, El Dorado County, and Vice Chair is Supervisor Rhonda Duggan, Mono County.

In addition, each year the ESJPA Board appoints a Technical Advisory Group (TAG) Chair and Vice Chair. The TAG is comprised of the Delegate’s staff Alternates that meet and discuss technical issues impacting ESJPA jurisdictions. Our current Chair is Tedd Ward, Del Norte County and Vice Chair is Narcisa Untal, Solano County.

The ESJPA and TAG Officers will assume their roles effective January 1, 2026.

Staff Recommendations:

Staff recommends the Board of Directors take action to:

1. Elect the 2026 ESJPA Chair/Vice Chair.
2. Appoint the 2026 TAG Chair/Vice Chair.



**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

MEMORANDUM

To: ESJPA Board of Directors

From: Milena De Melo, RCRC Finance Director

Date: December 3, 2025

RE: ESJPA 2026 Operating Budget – **ACTION**

The proposed 2026 Environmental Services Joint Powers Authority (“ESJPA”) Operating Budget supports our continued commitment to the core functions of providing solid waste planning, solid waste services, regulatory advocacy, and other environmental services to member counties. Additionally, the budget takes into consideration the continued expansion of initiatives as defined in the 2026-2028 ESJPA business plan and approved by the Board during the October 2025 meeting.

Summary

To better understand the budget, it is necessary to understand the inter-relationship between the ESJPA and Rural County Representatives of California (“RCRC”). ESJPA and RCRC are two separate legal entities, each with their own by-laws and Board of Directors. RCRC is a non-profit mutual benefit corporation with a Board of Directors consisting of County Supervisors who are representatives of the now forty (40) participating counties. The ESJPA, however, is a governmental agency with a Joint Powers Agreement. The Board of Directors of ESJPA consists of delegates (or designated staff “alternates”) from ESJPA’s 26 member counties. ESJPA does not employ staff, but instead contracts with RCRC to provide management, technical, and administrative services as directed by the ESJPA delegates. This contract is subject to annual review and follows the budget on today’s agenda.

The proposed ESJPA budget includes total revenues of \$680,100, proposed expenditures of \$574,790, and results in net revenue over expenditures of \$105,310 for the year ending December 31, 2026.

Revenues

ESJPA's proposed 2026 revenue includes \$142,800 in membership dues from its twenty-six (26) member counties, a \$165,000 contribution from RCRC and grant reimbursements and contract revenue for \$372,300, which reflects a decrease from the year ended December 31, 2026, by \$57,700. The following is a list of current grants and contract activities that are included in the 2026 budget:

- CalRecycle Used Oil Payment Program (Alpine, Colusa, and Mariposa Counties)
- CalRecycle Local Government Waste Tire Amnesty Grant (Colusa, Mariposa, Sierra, and Tuolumne Counties) (TA6-21-0021)
- CalRecycle Rural Infrastructure for a Zero Waste Plan - In 2024 ESJPA's team was awarded a contract with CalRecycle to develop and implement a Statewide Zero Waste Plan. This contract is one component of a broader effort to develop a comprehensive statewide Zero Waste Plan that will move California from a single-use economy to a fully circular and zero waste economy. Total contract amount was for \$334,000. ESJPA anticipates completing the remainder of the work under this agreement in 2026 and approximately \$242,300 was included as revenue in 2026 Budget.

Expenditures

The proposed 2026 ESJPA expenditure budget is designed to provide the resources necessary to conduct core functions. One of the most significant budgeted expenditures are those associated with grant activities. Grant expenditures of \$130,000 are reimbursable and therefore approximate to grant revenues, with no change from the current year to 2026. In addition to existing used oil and tire amnesty grants, ESJPA has budgeted total expenditures for consultants for \$102,240 related to work awarded from a contract with CalRecycle as noted above.

Other non-grant related expenditures include RCRC Contract Services in accordance with the Board approved ESJPA/RCRC Agreement. As noted above, ESJPA staffing and other allocated expenditures are reflected in the \$311,000 contract support service fee to RCRC. Other significant expenditures include ESJPA's share of rent, accounting and auditing, and insurance costs totaling \$15,800.

Other Items

From time to time, ESJPA experiences cash shortfalls due to the timing of grant reimbursements. In 2015, the RCRC Board provided a standing short-term revolving loan facility to ESJPA of up to \$100,000. This cash flow management tool remains in effect until cancelled.

Recommendation

It is recommended that the ESJPA Board of Directors approve and adopt the 2026 ESJPA Operating Budget.

Attachment

- 2026 ESJPA Operating Budget (Attachment A).

RURAL COUNTIES ENVIRONMENTAL SERVICES JOINT POWERS AUTHORITY**Operating Budget****For the year ended December 31, 2026**

| | 2026 Budget | 2025 Budget | Change Increase / (Decrease) |
|--------------------------------------|------------------------|------------------------|---|
| Revenue: | | | |
| Member county dues | \$ 142,800 | \$ 142,800 | \$ - |
| Contracts-grants/projects | 372,300 | 430,000 | (57,700) |
| Contribution from RCRC | 165,000 | 165,000 | - |
| Total Revenue | \$ 680,100 | \$ 737,800 | \$ (57,700) |
| Expenditures: | | | |
| Accounting and auditing | \$ 5,800 | \$ 5,775 | \$ 25 |
| Community relations | 500 | 1,000 | (500) |
| Computer maintenance and support | 3,000 | 3,000 | - |
| Conferences attended by staff | 500 | 1,000 | (500) |
| Consultants | 102,240 | 120,000 | (17,760) |
| Contract support service fee | 311,000 | 370,200 | (59,200) |
| Delivery services | 500 | 500 | - |
| Dues, fees and subscriptions | 1,750 | 1,750 | - |
| Equipment and furniture | 500 | 1,000 | (500) |
| Grants and contracts | 130,000 | 130,000 | - |
| Insurance | 5,000 | 4,700 | 300 |
| Legal fees | 500 | 1,000 | (500) |
| Meetings | 5,000 | 3,000 | 2,000 |
| Miscellaneous | 500 | 500 | - |
| Office expenses | 750 | 250 | 500 |
| Printing and duplication | 250 | - | 250 |
| Rent | 5,000 | 7,400 | (2,400) |
| Training | 500 | 750 | (250) |
| Travel | 1,000 | 1,000 | - |
| Travel - board member reimbursements | 500 | 1,000 | (500) |
| Total Expenditures | \$ 574,790 | \$ 653,825 | \$ (78,535) |
| Net Expenditures over Revenue | \$ 105,310 | \$ 83,975 | \$ 21,335 |



TECHNICAL ADVISORY GROUP (TAG)

MEMORANDUM

To: ESJPA Board of Directors

From: Staci Heaton, Deputy Executive Director

Date: December 4, 2025

RE: Approval of the 2026-28 ESJPA Business Plan (ACTION)

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 presenting a final draft of the 2026-28 ESJPA Business Plan to the Board. 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, and received additional feedback from the Board.

Recommendation

It is recommended that the ESJPA Board approve the final 2026-2028 ESJPA Business Plan.

Attachments

- Final 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:

- N/A

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:* Reach out to individual members to further understanding of local issues and concerns and provide timely updates and guidance on state and federal political developments.
- *Strategy:* Expand training opportunities to address members' needs.
- *Strategy:* Promote remote participation options to increase board meeting attendance.

Metrics:

- *Number of trainings conducted.*
- *Percentage of member counties represented in attendance at Board Meetings*
- *Grant Benefits:*
 - *Number of jurisdictions that benefited from grant-funded programs.*
 - *Number of grant applications completed on behalf of jurisdictions.*

Goal: Increased Visibility

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

- *Strategy:* Conduct presentations on ESJPA programs and services to County Boards and provide 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 all ESJPA programs, tools, and services.
- *Strategy:* Leverage multimedia tools, including video content, to enhance ESJPA's advocacy efforts and broaden stakeholder engagement.

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 recycling and 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, regulatory agencies, and nonprofits.
- *Strategy:* Increase engagement with coalitions.
- *Strategy:* Organize educational tours of member county facilities with legislators and CalRecycle to raise awareness of rural county needs.
- *Strategy:* Identify opportunities to provide input to legislators and regulators on disaster response planning and policy.

Metrics:

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

Number of adopted bills and regulations that incorporated advocated positions by ESJPA.

Agenda Item VIII

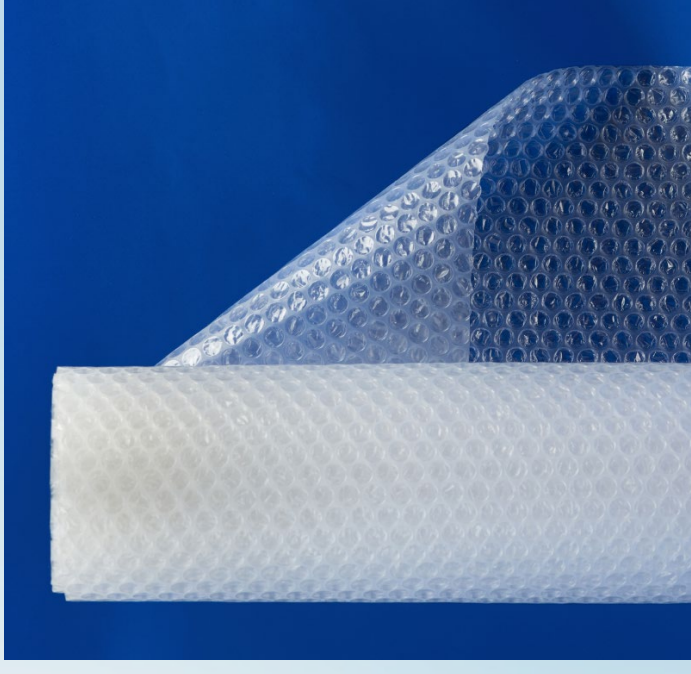
SOLID WASTE/ REGULATORY UPDATES

Plastic Pollution Prevention and Packaging Producer Responsibility Act

Public Meeting: Material Characterization Study Preliminary Findings

SB 54 (Allen, Chapter 75, Statutes of 2022)
Department of Resources Recycling and
Recovery (CalRecycle)

October, 28, 2025



Safety Announcement

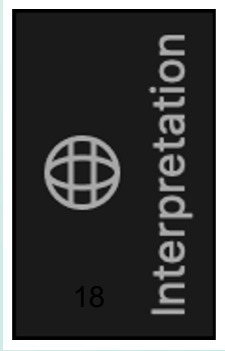
In the event of a fire alarm, we are required to evacuate.

1. Take your valuables and use exit signs.
2. Do not use elevators.
3. If you cannot use stairs, you will be directed to a protective vestibule inside a stairwell.
4. If relocated, exercise caution crossing the street.

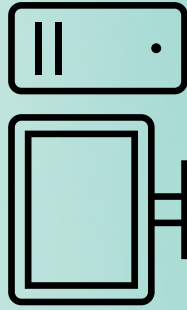
Interpretation Services | Servicios de Interpretación



In Person – Ask our team for a translation headset
En persona – Solicite asistencia si necesita audífonos de traducción



Zoom – Select your language on the Interpretation icon
Zoom - Seleccione su idioma en el icono Interpretación



Webcast - <https://video.calepa.ca.gov/#/>
Transmisión en línea - <https://video.calepa.ca.gov/#/>

Disclaimer

This communication is neither intended to, nor does it constitute definitive legal counseling, conclusions, or advice in any way. Instead, the contents of this communication and any analysis, guidance, or other information is intended to objectively address the question(s) presented based on the current existing, known facts and legal authority as described to and understood by the author and/or CalRecycle at the time of this communication. Please be advised that any relevant facts or legal authority or authorities that are undisclosed or unknown at the time of this communication may affect or alter any analysis, guidance, or other information herein. Please be further advised that any analysis, guidance, or other information herein may be subject to change and/or correction based on changed facts or legal authority, actual or understood, subsequent to the time of this communication. No analysis, guidance, or other information herein should be construed as a waiver of any rights or remedies available to CalRecycle. Recipients of this communication are encouraged to seek the assistance of legal counsel to comply with applicable state law based on current facts and circumstances.

Today's Public Meeting

- Present on CalRecycle's recent SB 54 publications:
 - What's in California Landfills: Measuring Single-Use Packaging and Plastic Food Service Ware Disposed Of 2025 – SB 54 Material Characterization Study Revised Preliminary Findings
- All previous public workshop materials are available on CalRecycle's [SB 54 webpage](#) under "[Past Events](#)."
- Not addressing today:
 - Rulemaking or draft regulatory text. Please refer to CalRecycle's [SB 54 regulations webpage](#) for regulatory updates.
 - Needs Assessment or the Covered Material Categories (CMC) list update. Please refer to the [SB 54 CMC webpage](#) for CMC list updates.

Agenda

Opening Remarks

Dan Brown, Acting Policy Director, Policy Development and Analysis Office

Part 1: SB 54 Material Characterization Study Overview

Jennifer Haynes White, Senior Environmental Scientist Supervisor, Knowledge Integration Section

Part 2: General Material Characterization Study

Travis Dennis, Environmental Scientist, Knowledge Integration Section

Part 3: Study Methodology and Report Overview

Monica Oropeza, Environmental Scientist, Knowledge Integration Section

Part 4: Preliminary Findings

Travis Dennis, Environmental Scientist, Knowledge Integration Section

Part 5: Next Steps

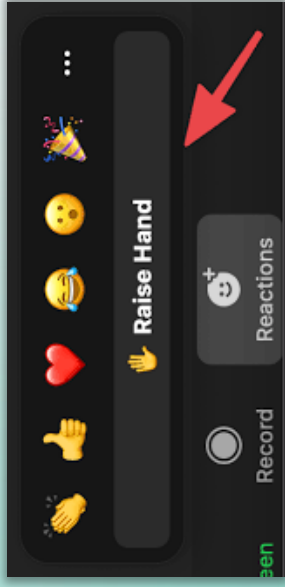
Dan Brown, Acting Policy Director, Policy Development and Analysis Office

Part 6: Questions and Public Comments

Marcus Santillano, Environmental Program Manager, Packaging EPR Section

Public Comments (1 of 2)

- **Attending in person** – please line up at the podium when the chair opens public comments.
- **Participating on Zoom** – please raise your hand when the chair opens public comments; the host will unmute you.



- **Written comment via Zoom** – please use the chat box and message the entity named "Public Comments"
- Email wastechar@calrecycle.ca.gov Subject: SB 54 MCS Public Meeting

Opening Remarks

Dan Brown

Acting Policy Director, Policy Development and Analysis Office

Part 1. SB 54 Material Characterization Study Overview

Department of Resources Recycling and Recovery Knowledge Integration Section

Jennifer Haynes White

Senior Environmental Scientist Supervisor, Knowledge Integration Section

SB 54 Material Characterization Study (MCS)

- Senate Bill (SB) 54 requires CalRecycle to conduct and publish a characterization study to determine the approximate amount of covered material disposed of in California landfills – Public Resources Code (PRC) 42061(a)(2)-(3).
- CalRecycle must update the study in 2028, 2030, 2032, and every four years thereafter. – PRC 42061(a)(4)
- CalRecycle may publish additional information that was not available at the time of the most recent MCS. – PRC 42061(a)(5)

Report Publication and Public Engagement Timeline

- June 30, 2025 - Preliminary Report ([DRRR-2025-1755](#)) published
- September 30, 2025 – Revised Preliminary Report ([DRRR-2025-1757](#)) published
- October 28, 2025 – Public Meeting
- November 12, 2025 – Submission date for public comments to inform final findings (wastechar@calrecycle.ca.gov)
- By December 27, 2025 – Final Findings Report published

Part 2. General Material

Characterization Study Overview

Department of Resources Recycling and Recovery

Knowledge Integration Section

Travis Dennis

Environmental Scientist, Knowledge Integration Section

What is a Material Characterization Study (MCS)?

- Study to estimate the composition of material in a specific material stream, such as landfill disposal [Video Link](#)



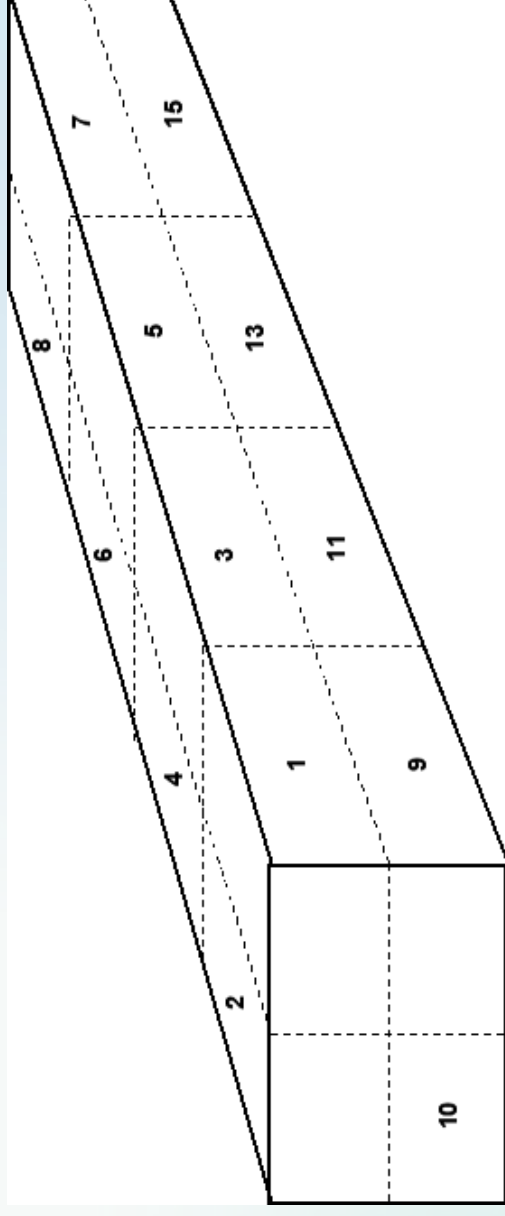
Fieldwork Preparation

1. Study design
 - Development of sorting categories and related training materials
 - Review and approve contractor study design
2. Site determination
 - Information gathering for each selected site
 - Estimates of the minimum number of vehicles by sector per day
 - Estimates for tonnage inflows by sector
3. Site selection
 - Scheduling logistics
 - Sorting crew needs and requirements

Fieldwork Activities

1. Gate surveys and vehicle selection
 - Gathered information on incoming vehicles
 - Selected vehicles for sampling
 - Collected additional data on the selected vehicles
2. Sample selection
 - Imaginary 16 cell block grid imposed over truck load
 - At random, selected 1 of the cell block
 - Extracted a 200-pound sample from selected cell

3. Sample screening and sorting
4. Weighing of sorted materials



Post-Fieldwork Activities

- Data Preparation
 - Align samples and materials between datasets
- Data Analysis
 - Compositional estimates (using sort data)
 - Relative disposal tonnage estimates by sector (using gate survey data)
 - Statewide disposal tonnage estimates (using [RDRS](#) data)
- Report Writing

Part 3. SB 54 MCS Methodology and Report Organization

Department of Resources Recycling and Recovery Knowledge Integration Section

Monica Oropeza

Environmental Scientist, Knowledge Integration Section

Scope of Preliminary Findings

- This report presents the findings of the material characterization study conducted to determine the approximate amount of covered materials (i.e. single-use packaging and single-use plastic food service ware) disposed of in California landfills.
- The findings do not address material sent for recovery or ultimate disposition of materials transferred out of state.

CalRecycle's Role

- Project oversight
- Quality control sort on all Remainder/Composite categories
 - For subset of samples, conducted additional sort to identify additional covered materials
- Data analysis
- Report writing

Contractor's Role

- Conducted vehicle surveys
 - Gathered information on incoming vehicles
 - Selected vehicles for sampling, and
 - Collected additional data on the selected vehicles
- Collected samples from selected vehicles
- Sorted and weighed samples into 83 categories
- CMC categories: Class → Type → Form
 - Remainder class categories: Ceramics, Glass, Metal, Paper/Fiber, Plastic, and Wood and Other Organic Materials.
 - Conducted de-packaging analysis, volume-to-weight determination, and unknown plastic analysis on a subset of sampled material
- Provided QA/QC'd sorting data to CalRecycle

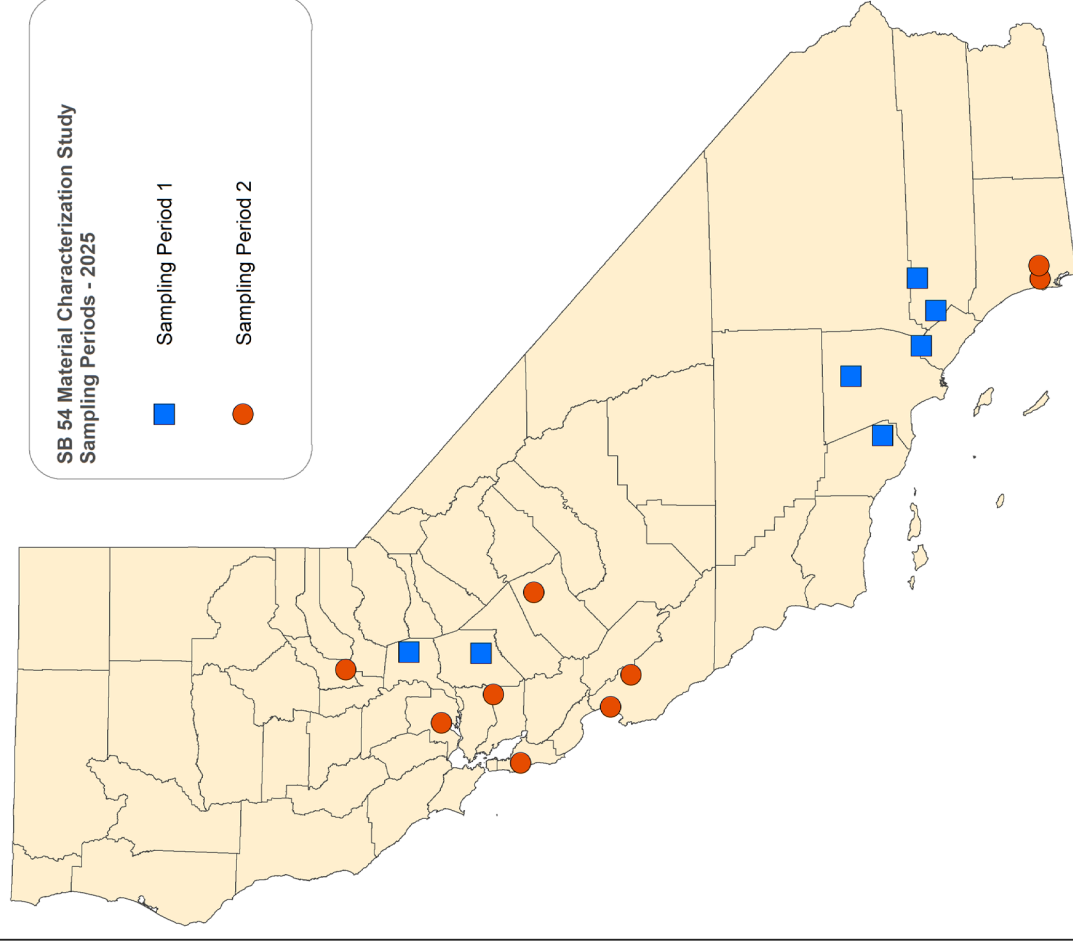
Study Methodology

Study Overview

- 2 sampling periods
 - 15 days of sampling during the first period
 - 19 days of sampling during the second period
- 16 landfills
- ~2 days at each landfill
 - Additional day at the first landfill for training
 - Duration varied by site depending on operational conditions and weather.
- 313 samples collected from all sectors

Study Site Selection

- Prioritized landfills with:
 - Higher proportion of the state's waste disposal stream
 - Largest annual inflow tonnage that received material from the four sectors



Field Methodology

- Samples collected from four sectors
 1. 83 Franchised single-family residential
 2. 140 Franchised commercial and multi-family residential
 3. 62 Self-hauled
 4. 28 Comingled waste (transfer trailer)
- Samples weighed at least 200 pounds
- Samples sorted into 83 categories based largely on covered material categories (CMCs)

4 Types of Material Sorting Categories

1. Covered material (67 total)
 - Packaging (plastic and non-plastic)
 - Single use food service ware
2. Potentially reusable alternatives to covered material (6 total)
3. Mixture classification (2 total)
 - Two categories specific to covered material that was discarded with the good or food still inside
4. Remainder material (i.e., all other material that is not covered under the Act) (8 total)
 - California Redemption Value (CRV) beverage containers
 - Grocery bags, trash bags, pet waste bag
 - Food and green waste
 - Mixed residue

Example of Field Sorting Process

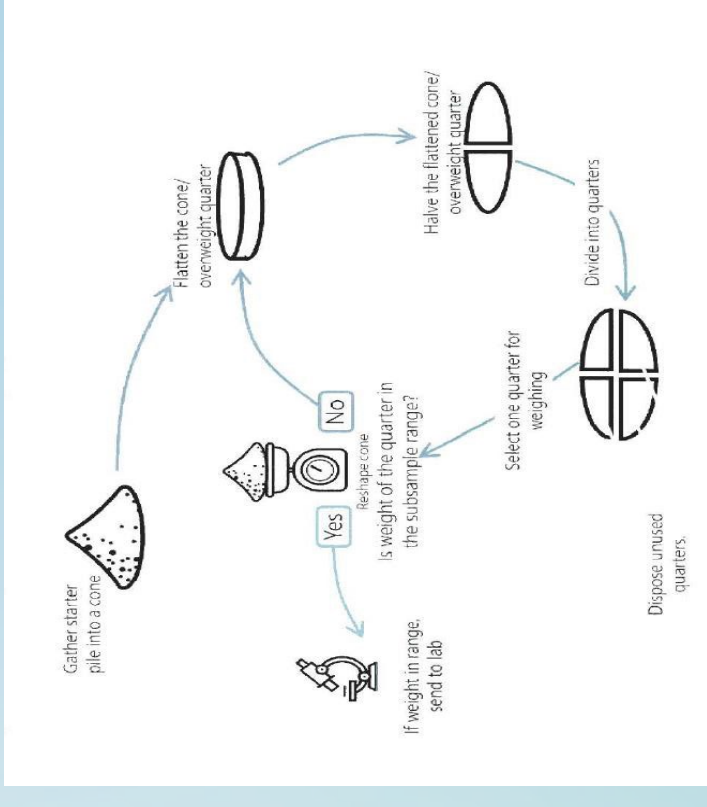
- “Glass Bottles and Jars that are covered material”
 - Glass Bottles and Jars with a plastic component (CMC Code 24_G1P)
 - Glass Bottles and Jars without a plastic component (CMC Code 24_G1N)
- Any glass received from Remainder / Composite given to the CalRecycle for a quality control sort.
- Remainder glass includes CRV beverage container glass

| 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 |

Additional Analysis Methodology

Additional Analysis: Covered Material Made of Plastic Hard-to-Identify Resin Type

- Covered material categories made of resin unidentifiable in the field :
 - Other/Mixed Plastics Rigid Items (CMC code 24_P35P) [527 items]
 - Other/Mixed Plastics Flexible and Film Items (CMC code 24_P35P) [563 items]
- Samples randomly collected from using Cone and Quarter Method
- Samples sent to an off-site lab 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



Additional Analysis: Weight-to-Volume (Density) Methodology

- Contractor aggregated sorted categories of covered material
- Contractor recorded height and weight of sorted material in a container of known volume
- Weight-to-volume density - 51 covered materials
- Too rare to be considered- 16 covered materials

Additional Analysis: Covered Material Discarded with Good Still Inside

- For subset of samples for two sorting categories, contractor separated the covered material from the good still inside
 1. Food Discarded in Original Packaging or Food Service Ware (85 samples)
 2. Non-food Discarded in Original Packaging (78 samples)
- Examples
 - Can of beans – beans removed from metal can
 - Bottle of lotion – lotion removed from bottle
- Covered material with food/good inside
 - Removed good and cleaned covered material
 - Weight of covered material recorded by material class
- Data used to estimate proportional weight of covered material discarded in those two categories

Report Organization

Structure of Revised Preliminary Findings Report

- Background
- Methodology
 - Estimating Composition of Landfilled Material in California
- Summary of Findings
 - Estimates of Statewide Disposal of Covered Material
 - Additional Analysis:
 - Spectroscopic Analysis of Hard-to-Identify Resins
 - Weight-to-Volume conversion factors for certain covered materials

Changes from the Preliminary Findings Report (1 of 2)

Main Report

- Updated
 - Updated disposal tonnage of covered materials
 - Statistical analysis methods
- Added tables:
 - Estimated disposal of covered material, by material class
 - Weight-to-volume (density) measurements for categories containing covered materials

Changes from the Preliminary Findings Report (2 of 2)

Appendix 1

- Revised statistical analysis
 - Statistical modeling methodology
 - Confidence intervals added to tables
- Weight-to-Volume conversion factors for certain covered materials
 - Detailed methodology
 - Weight-to-volume conversion factor table
 - Rare material categories not analyzed for weight-to-volume conversion factor measurements

Appendix 2

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

Part 4. Revised Preliminary Findings

Department of Resources Recycling and Recovery Knowledge Integration Section

Travis Dennis

Environmental Scientist, Knowledge Integration Section

Revised Report Findings

- 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

Estimates of Statewide Disposal of Covered Material Classes in 2024

| Material Class | Average (mean) annual disposal (statewide tons) | Proportion of total statewide disposal | Proportion of covered material disposal |
|----------------------------------|---|--|---|
| Paper and Fiber | 3,929,375 | 9.81% | 46.46% |
| Plastic | 3,123,797 | 7.80% | 36.94% |
| Wood and Other Organic Materials | 811,999 | 2.03% | 9.60% |
| Metal | 432,265 | 1.08% | 5.11% |
| Glass | 154,149 | 0.39% | 1.82% |
| Ceramic | 5,564 | 0.01% | 0.07% |
| Total | 8,457,149 | 21.12% | 100% |

Top 5 Disposed CMCs

| Material Class | Material Type | Material Form | Annual disposal estimate (statewide tons, mean) | Estimated Proportion of Total Statewide Disposal |
|----------------------------------|-------------------------|-------------------------|---|--|
| Paper and Fiber | OCC | Cardboard | 2,042,929 | 5.10% |
| Wood and Other Organic Materials | Wood | All Untreated Forms | 703,062 | 1.76% |
| Plastic | Other/Mixed Plastics | Flexible and Film Items | 650,085 | 1.62% |
| Paper and Fiber | Multi-Material Laminate | Other Forms | 549,429 | 1.37% |
| Paper and Fiber | Paperboard | All Forms | 487,428 | 1.22% |

Top 5 Plastic CMCs

| Combined CMC Code | Material Class | Material Type | Material Form | Annual disposal estimate (statewide tons, mean) | Estimated Proportion of Total Statewide Disposal |
|-------------------|----------------|----------------------|---|---|--|
| 24_P36P | Plastic | Other/Mixed Plastics | Flexible and Film Items | 650,085 | 1.62% |
| 24_P41P | Plastic | PP (#5) | Other Rigid Containers, Cups, Lids, Plates, Trays, and Tubs | 371,670 | 0.93% |
| 24_P16P | Plastic | LDPE (#4) | Other Flexible and Film Items | 290,978 | 0.73% |
| 24_P15P | Plastic | LDPE (#4) | Clear Non-Bag Film | 263,481 | 0.66% |
| 24_P38P | Plastic | PET (#1) | Other Rigid Containers, Cups, Lids, Plates, Trays, and Tubs | 204,712 | 0.51% |

Top 5 Metal CMCs

| Combined CMC Code | Material Class | Material Type | Material Form | Annual disposal estimate (statewide tons, mean) | Estimated Proportion of Total Statewide Disposal |
|-------------------|----------------|-------------------|------------------------|---|--|
| 24_M6N/P | Metal | Tin/Steel/Bimetal | Non-aerosol Containers | 137,393 | 0.34% |
| 24_M2N/P | Metal | Aluminum | Foil Sheets | 66,305 | 0.17% |
| 24_M8N/P | Metal | Tin/Steel/Bimetal | Other Forms | 44,148 | 0.11% |
| 24_M7P | Metal | Tin/Steel/Bimetal | Aerosol Can | 38,929 | 0.10% |
| 24_M3N/P | Metal | Aluminum | Foil Molded Containers | 32,213 | 0.08% |

Top 5 Paper/Fiber CMCs

| Combined CMC Code | Material Class | Material Type | Material Form | Annual disposal estimate (statewide tons, mean) | Estimated Proportion of Total Statewide Disposal |
|-------------------|-----------------|-------------------------|---------------|---|--|
| 24_P F9N/P | Paper and Fiber | OCC | Cardboard | 2,042,929 | 5.10% |
| 24_P F7P | Paper and Fiber | Multi-Material Laminate | Other Forms | 549,429 | 1.37% |
| 24_P F10N/P | Paper and Fiber | Paperboard | All Forms | 487,428 | 1.22% |
| 24_P F1N/P | Paper and Fiber | Kraft Paper | All Forms | 289,887 | 0.72% |
| 24_P F14N/P | Paper and Fiber | Molded Fiber | All Forms | 163,462 | 0.41% |

Top 5 Wood and Other Organic Materials CMCs

| Combined CMC Code | Material Class | Material Type | Material Form | Annual disposal estimate (statewide tons, mean) | Estimated Proportion of Total Statewide Disposal |
|-------------------|----------------------------------|----------------------------------|--|---|--|
| 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_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% |
| 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% |

Top 3 Glass CMCs

| Combined CMC Code | Material Class | Material Type | Material Form | Annual disposal estimate (statewide tons, mean) | Estimated Proportion of Total Statewide Disposal |
|-------------------|----------------|---------------|--|---|--|
| 24_G1N/P | Glass | Glass | Bottles and Jars | 130,502 | 0.33% |
| 24_G3N/P | Glass | Glass | Small - Two or more sides measuring 2" or less | 14,398 | 0.04% |
| 24_G2N/P | Glass | Glass | Other Forms | 9,249 | 0.02% |

Top 2 Ceramic CMCs

| Combined CMC Code | Material Class | Material Type | Material Form | Annual disposal estimate (statewide tons, mean) | Estimated Proportion of Total Statewide Disposal |
|-------------------|----------------|---------------|--|---|--|
| 24_C2N/P | Ceramic | Ceramic | Small - Two or more sides measuring 2" or less | 4,391 | 0.01% |
| 24_C1N/P | Ceramic | Ceramic | All Forms | 1,172 | 0.00% |

Part 5. Next Steps

Department of Resources Recycling and Recovery Knowledge Integration Section

Dan Brown

Dan Brown, Branch Chief / Acting Policy Director,
Policy Development and Analysis Office

Next Steps

Public Comments

- Written feedback may be submitted to wastechar@calrecycle.ca.gov with subject line “*SB 54 Revised Preliminary Findings*” .
- Members of the public are requested to submit public comments, by **Wednesday November 12, 2025**

Final Publication

- 60 days after the formal public meeting, publish SB 54 MCS by December 27, 2025

Next Study

- Update to the SB 54 MCS is required in 2028

Part 6. Questions and Public Comments

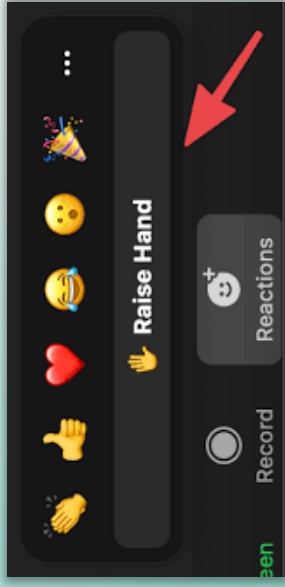
Department of Resources Recycling and Recovery Knowledge Integration Section

Marcus Santillano

Environmental Program Manager, Packaging EPR Section

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Illegal Dumping Solutions Report

Findings and Policy Implications for a Statewide Response to Illegal Dumping

Presented by the Alameda County Illegal Dumping (ACID) Task Force
Hosted by Alameda County Supervisor Nate Milley, District 4

Introduction

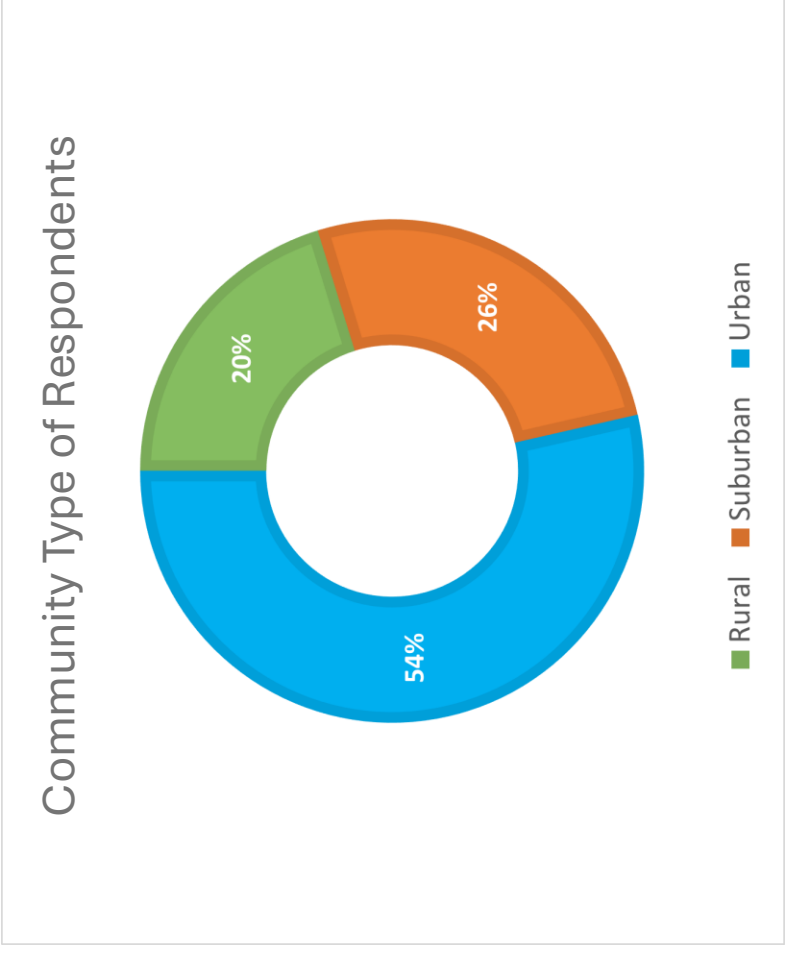
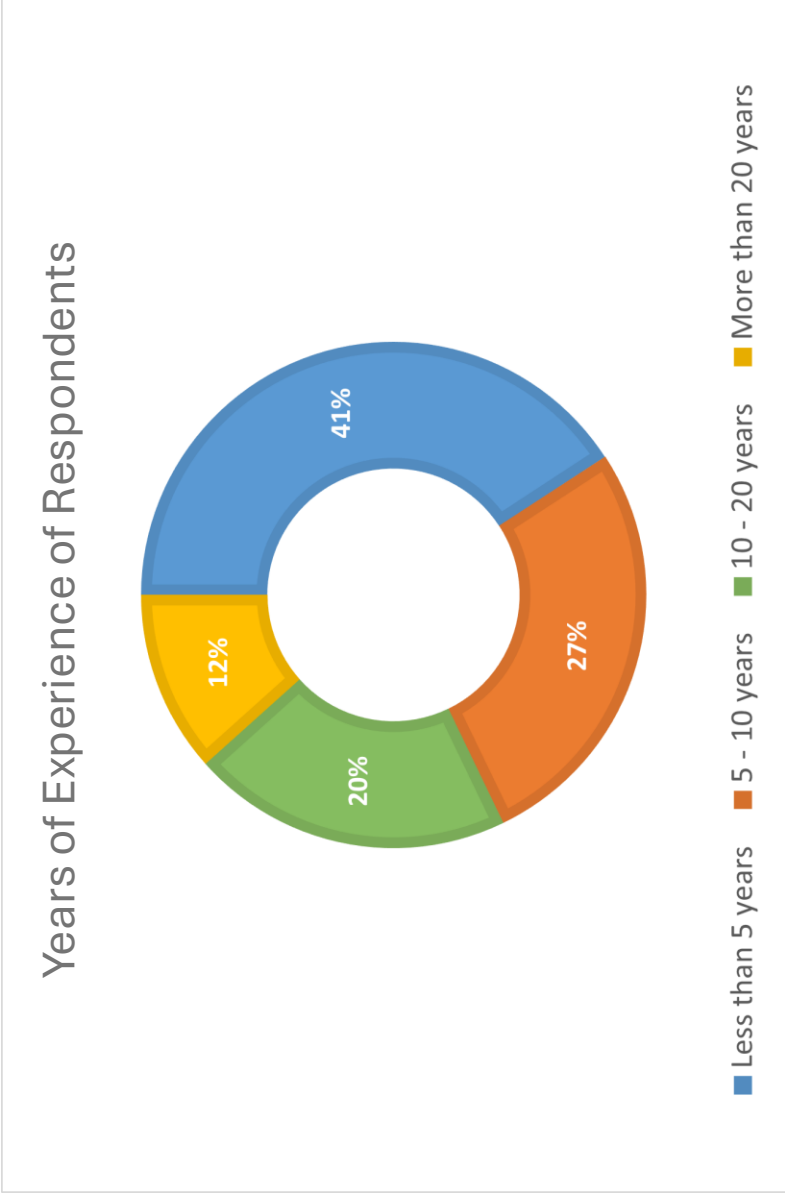
Alameda County Illegal Dumping (ACID) Task Force

- Founded in 2016 by Alameda County Supervisor Nate Miley and expanded during the pandemic
- Hosts the Statewide Conference on Illegal Dumping (IDCon) in 2021, '22, '23 and '24.
- Commissioned a statewide survey of illegal dumping experts.

Illegal Dumping Solutions Survey (2025)

- **Stakeholder Interviews**
 - Used To Inform Survey Design
 - Follow Up Interviews
- **Survey Instrument**
 - Target: *Experts In Addressing Illegal Dumping*
 - Focus: *Effective Interventions & Barriers To Addressing Illegal Dumping*
 - Cross-tab Analysis & P-value Testing

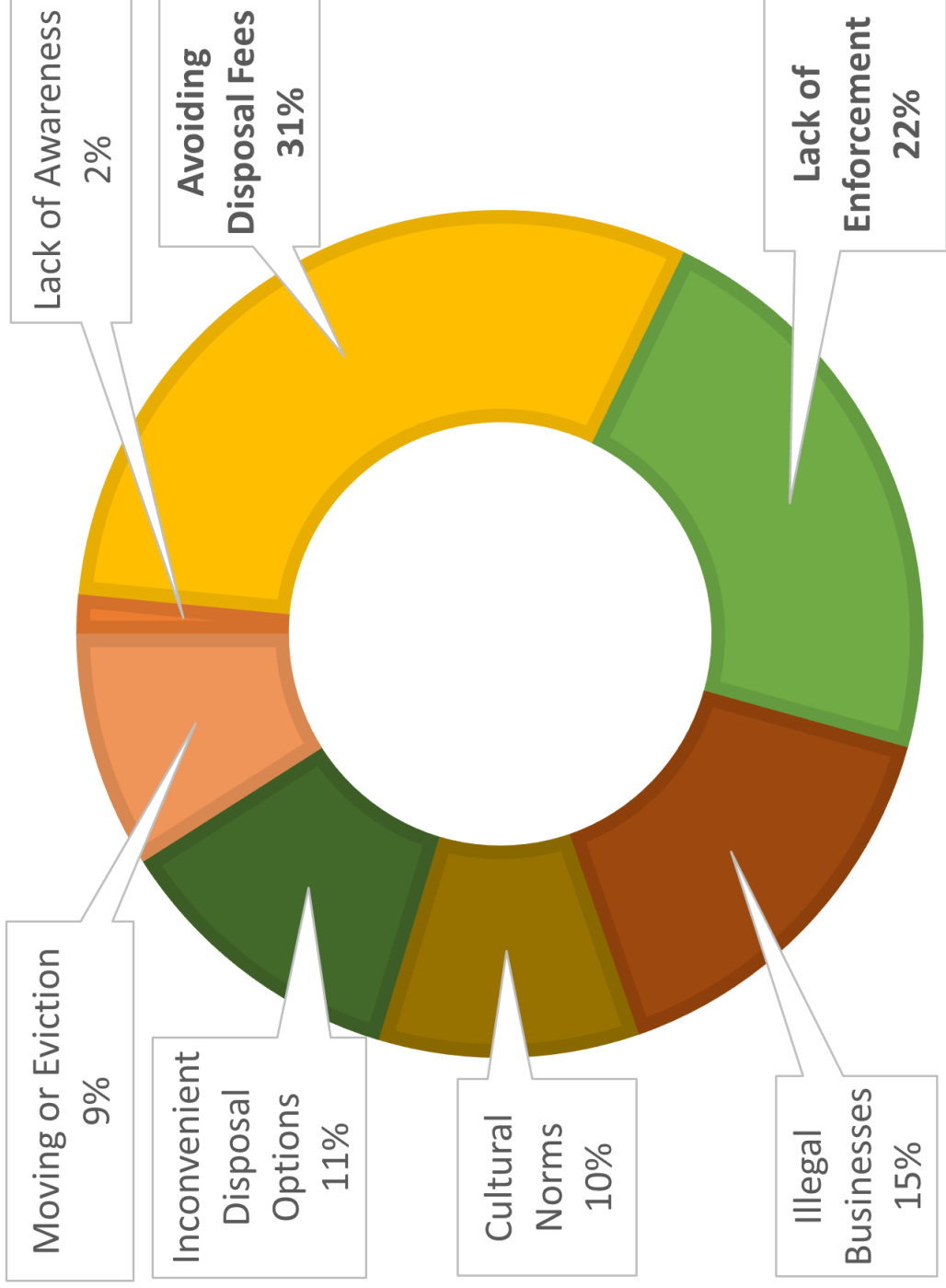
Survey Population (375 Respondents)



Survey Results

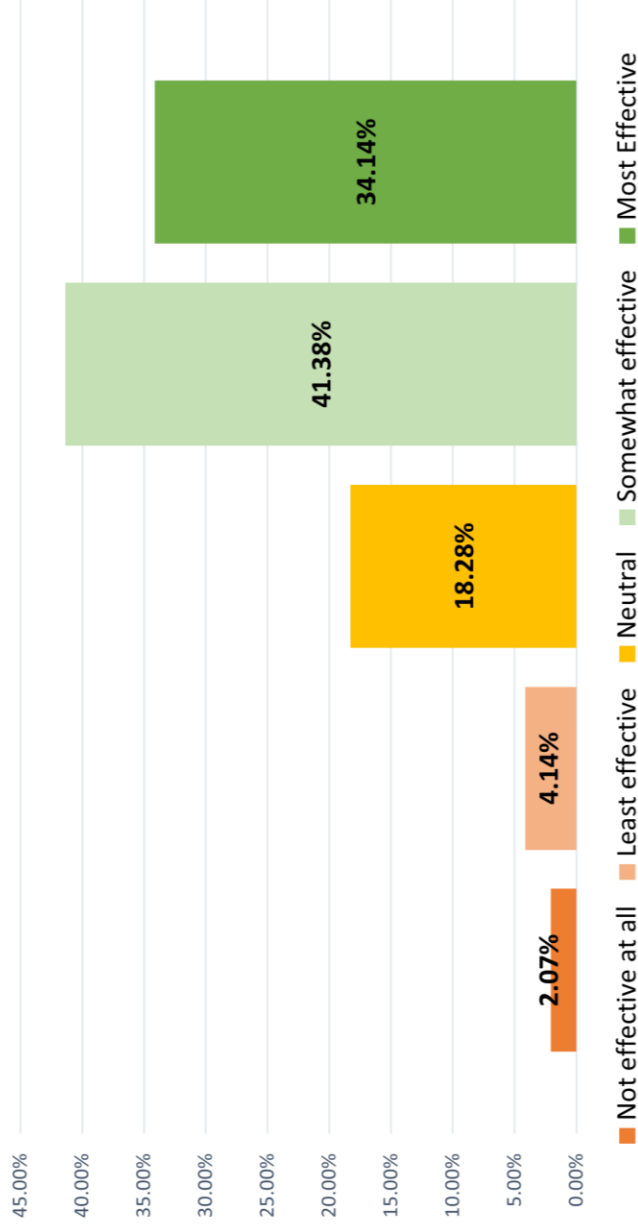
Causes of Illegal Dumping

CAUSES OF ILLEGAL DUMPING



Findings: Prevention Works!

Effectiveness of Prevention Strategies:
Beautification & Infrastructure Improvement



- **Beautification and Infrastructure Improvements** (76%) were considered the most effective preventative intervention.

Stakeholder interviews shared that **illegal dumping hotspots are often a product of the built environment.**

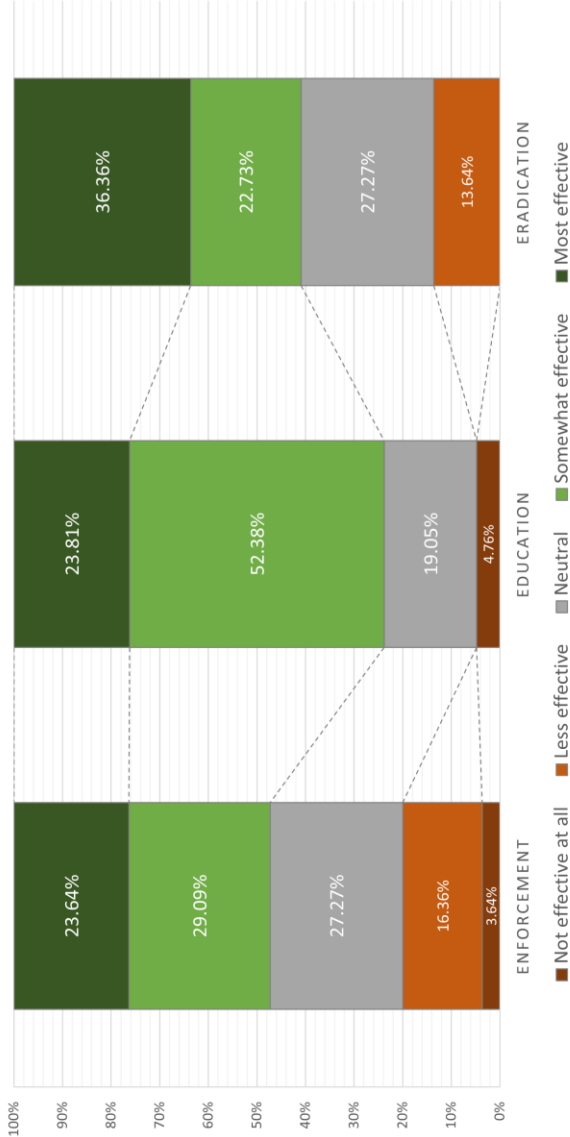
Unimproved curbs, lack of streetlighting, graffiti, and other **visual cues of deterioration** contribute to where it occurs.

“Prevention is a long-term solution!”

Business & Landlord Engagement



EFFECTIVENESS OF PARTNERSHIPS AT ERADICATION, BY ROLE



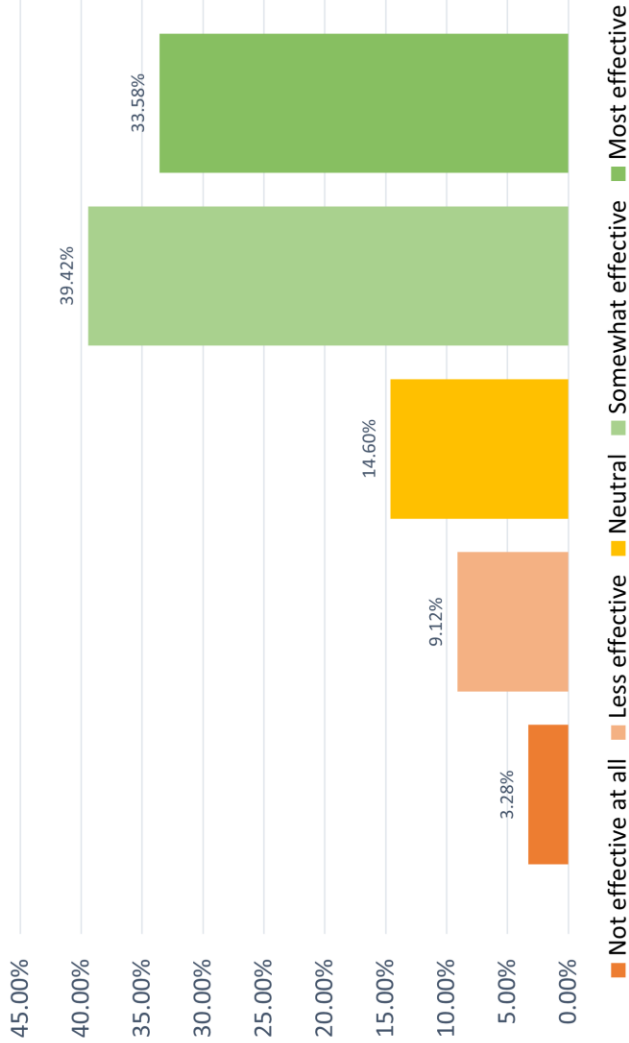
Findings: Partnerships

- Partnerships with CBO’s (73%) and Business / Landlord Engagement (73%) were ranked highly when measuring for effectiveness.
- The Education & Prevention role ranks Partnerships significantly higher (76%) than Enforcement (53%) and Eradication (56%).
- Stakeholder interviews agreed that “no jurisdiction can tackle this alone.”

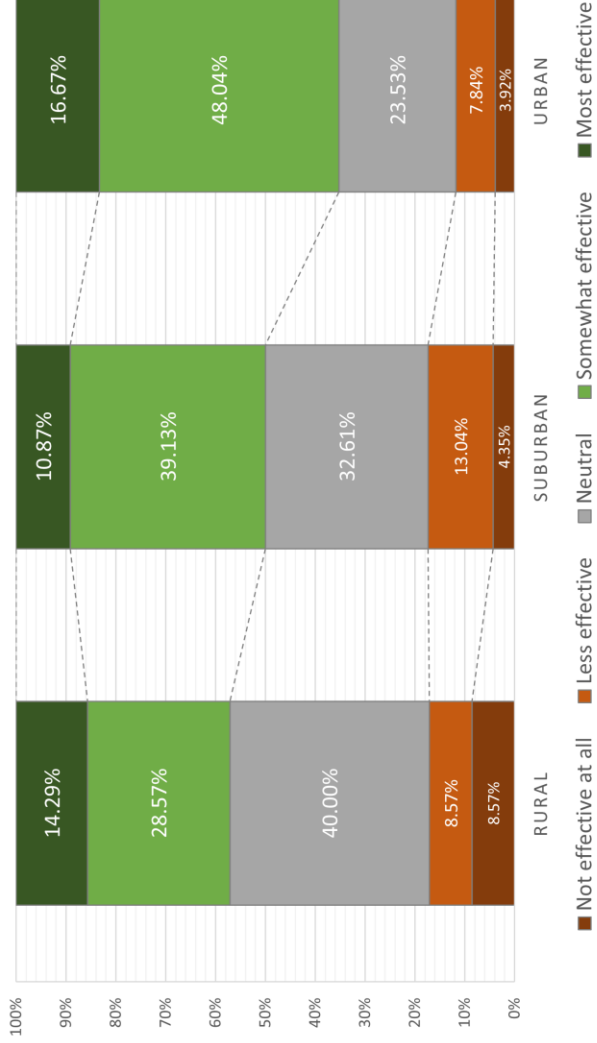
Findings: Eradication

- **All interventions had net positive ratings**, from *Municipal Clean-Up Crews* (74%) to *Adopt-a-Spot* (55%).
- Views of Adopt-A-Spot programs **varied by Community**.
- There is **no one-size-fits all solution** to illegal dumping.

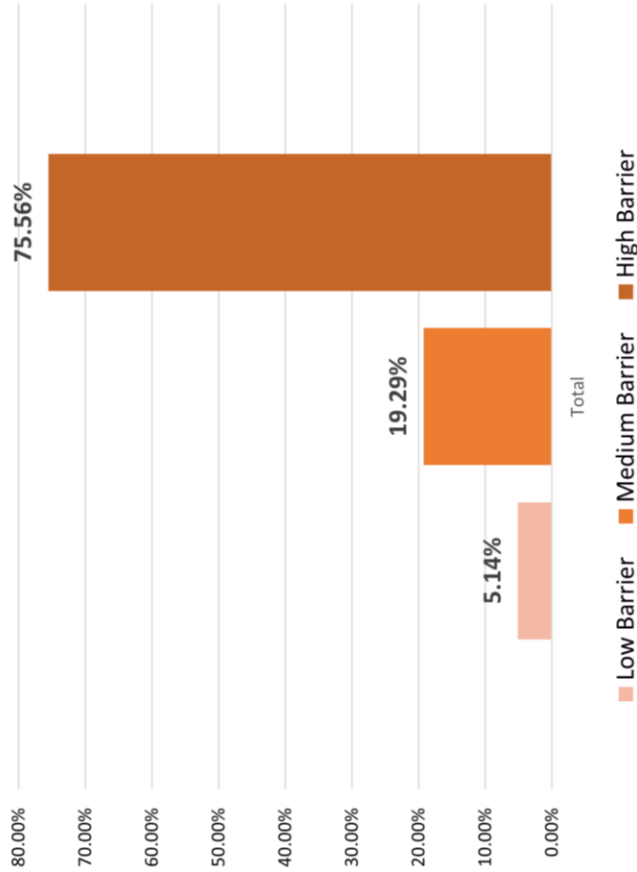
Effectiveness of Municipal Cleanup Crews at Eradication



EFFECTIVENESS OF ADOPT-A-SPOT AT ERADICATION,
BY COMMUNITY TYPE



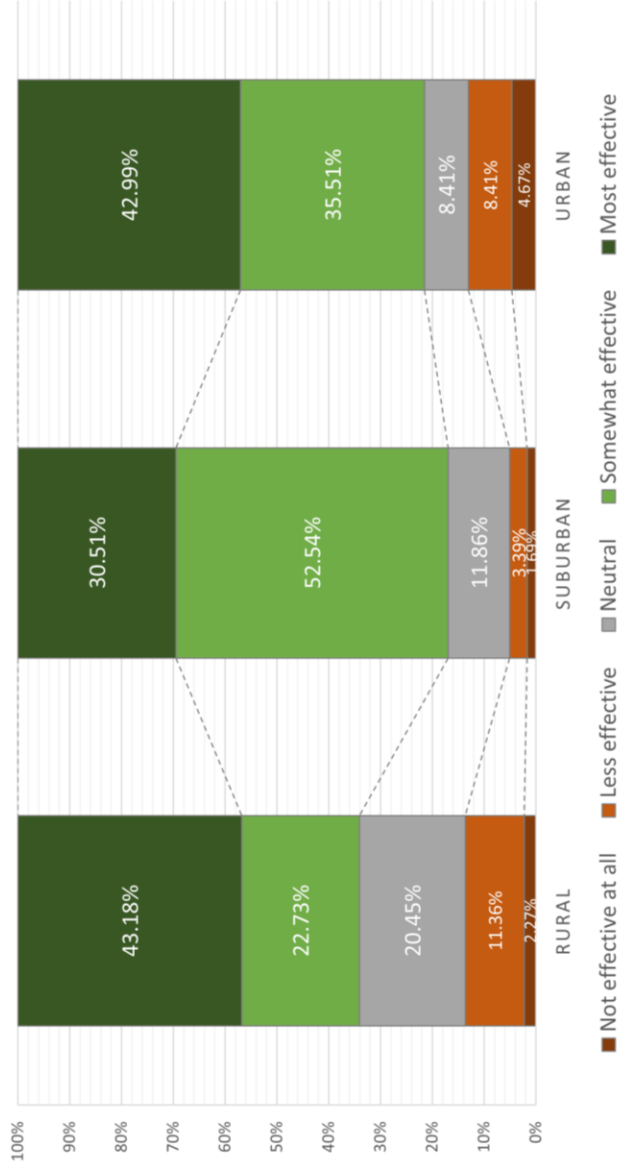
BARRIER TO ENFORCEMENT: LACK OF EVIDENCE



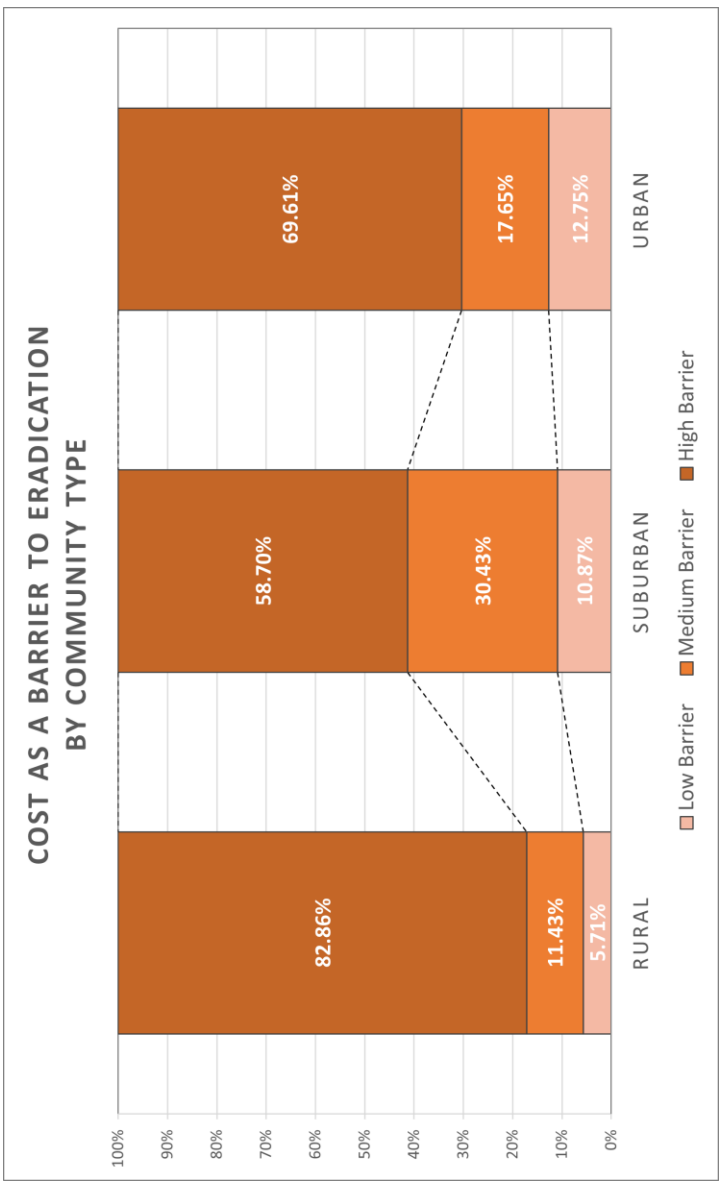
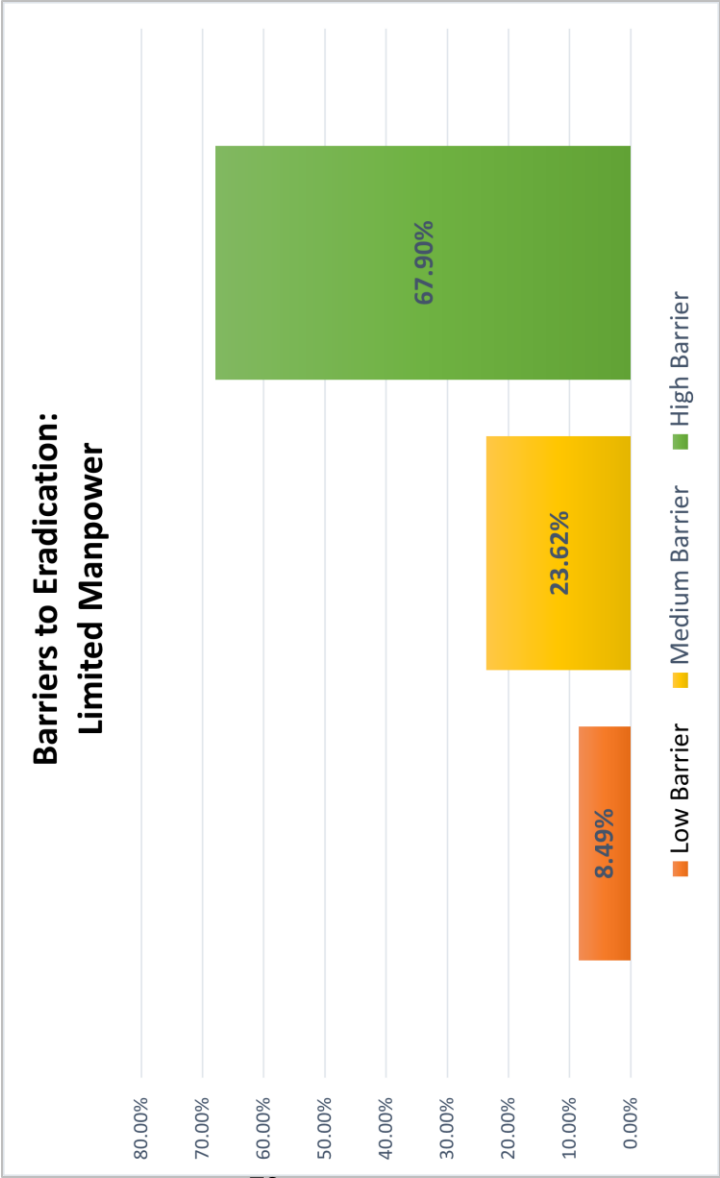
Findings: Enforcement

- The largest barrier to Enforcement was **Lack of Evidence**.
- *Surveillance Cameras* (78%) are **considered effective**.
- All stakeholders called for “*more enforcement!*”
- Like Adopt-a-Spot, **one size does not fit all**.

EFFECTIVENESS OF CAMERA-BASED ENFORCEMENT
BY COMMUNITY TYPE



Broad Agreement on Barriers: Funding and Manpower



Regardless of Community Type (Urban, Suburban, Rural), Experience Level, or Role (Education, Eradication, Enforcement), **Funding and Manpower were the highest barriers.**

Key Findings

Key Finding 1:

The Implementation Gap

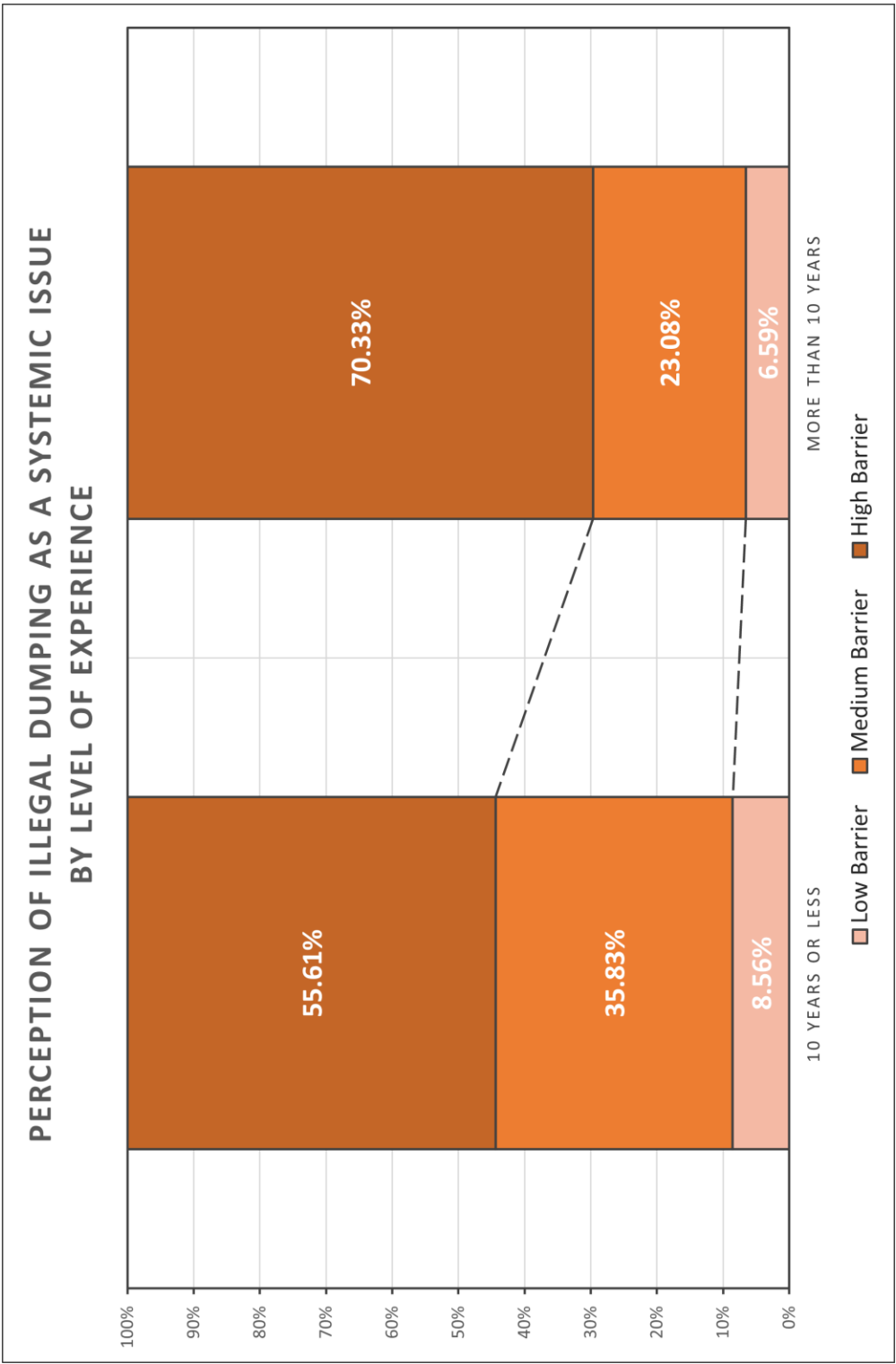
**Experts know what is effective
but lack the resources
(Funding & Manpower)
to implement at scale.**

Let's discuss: The Implementation Gap

- Respondents overwhelmingly cited *Lack of Funding* (69.0%) and *Resource Constraints* (67.9%) as the most significant barriers.
- Triage solutions are prioritized over long-term fixes.
- **The result:**
 - Loss of Public Trust,
 - Community is Frustrated,
 - Social & Economic Impacts,
 - Problem doesn't go away, it gets worse.

Key Finding 2:

Divergence by Experience Level



Example of Systemic Thinking: School Litter

- A neighborhood school was giving juice boxes to students at lunch, and the small plastic straw wrappers were a persistent source of litter.
- A “triage response” might have focused on adding more trash cans or hiring custodians.
- Instead, an experienced ACID Task Force member worked with the school to implement an incentive program: students who returned two wrappers received a small reward.
- This “systemic intervention” worked upstream to address the problem at its source.
- Quickly, the juice box wrappers disappeared.



Let's discuss: The Knowledge Gap

- The *level of expertise* (# of years) influences how a practitioner responds to illegal dumping.
 - Experience ↑ = Systemic Thinking ↑
- **The result:**
 - Jurisdictional responses are at risk of *Institutional Amnesia* when experienced staff leave.
 - Without coordination, isolated jurisdictions operate in silos while reinventing the wheel.
 - Ineffective solutions are reused (e.g. placing dumpsters at hotspots)

What's Missing?

The State's role as Convener

- **Illegal Dumping is a complex, systemic challenge, requiring a coordinated approach:**
 - Without centralized leadership, jurisdictions are responding alone.
 - Low coordination means a fractured and uninformed response.

The State is the only body with the **scale and resources** needed to provide statewide **leadership and coordination** on Illegal Dumping.

Recommendations

Recommendations:



INCREASE STATE LEADERSHIP

Coordinate cross-jurisdictional efforts,
Collect and disseminate best practices,
Fund proven interventions.



DURABLE COLLABORATIONS

Retain and share expertise,
Interagency partnerships,
Knowledge transfer programs.



ADEQUATE RESOURCES

Stable and adequate funding,
Appropriate staffing levels,
Across all levels: State, Regional, Local.

ILLEGAL DUMPING SOLUTIONS REPORT

FINDINGS AND POLICY IMPLICATIONS FOR A STATEWIDE RESPONSE TO ILLEGAL DUMPING



Download the
White Paper
TODAY!

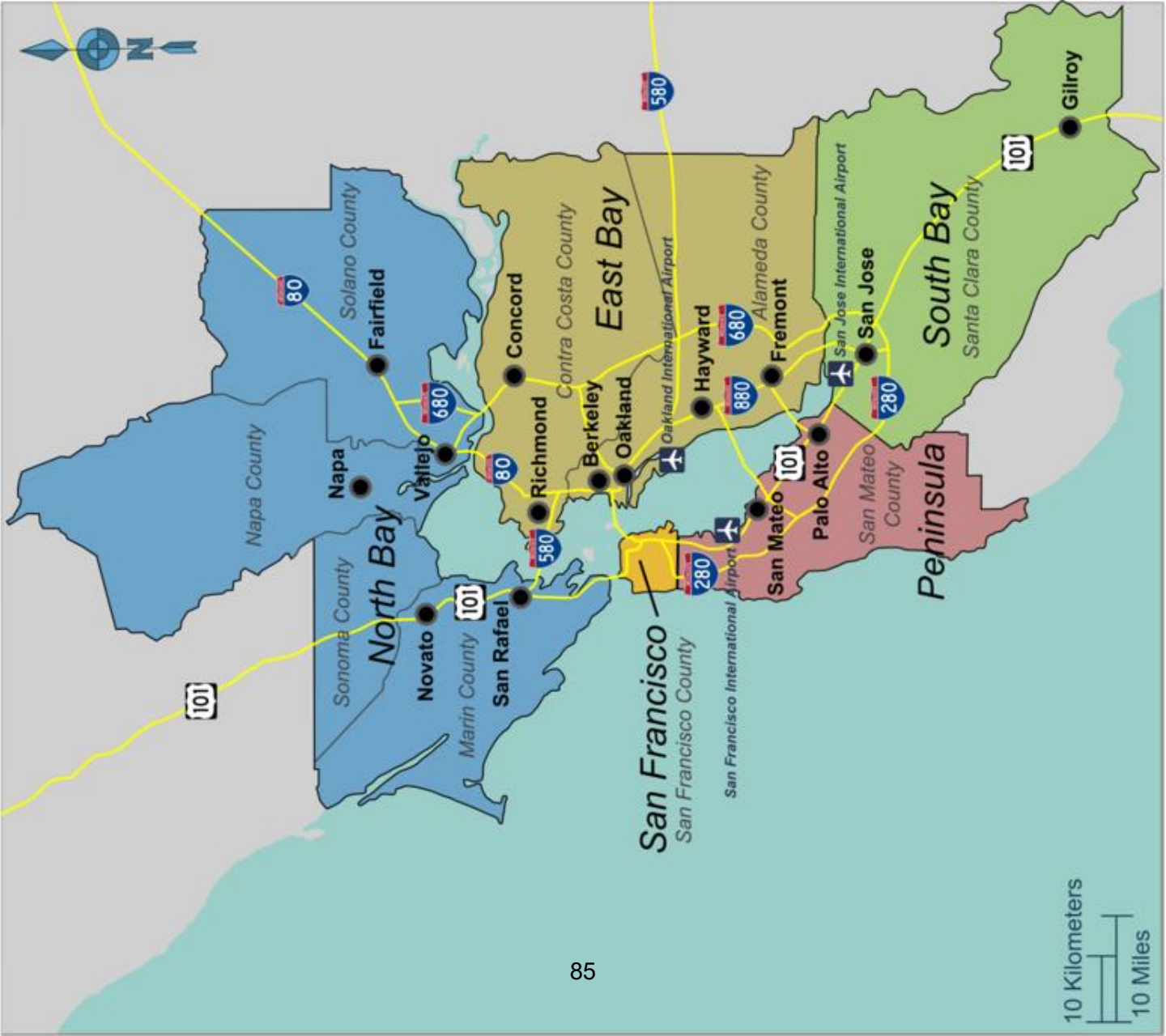


Model Ordinance: Illegal Dumping Enforcement

Bay Area Regional Convening on Illegal Dumping
October 29th, 2025

Why A Uniform Policy Matters:

- Eliminates Gaps & Loopholes
- Improved Public Education
- Stronger Deterrence
- Easier Investigations
- Faster Prosecution
- Cross-Jurisdiction Collaboration
- Improved Data & Analytics



Model Ordinance Overview

Model Ordinance Overview

1

Expands Accountability

- Expanded Definitions
- Thoughtful Exemptions

2

Updates Penalties

- Administrative Fines
- Aggravating Factors
- Administrative Process

Definitions

ILLEGAL DUMPING IS A MISDEMEANOR

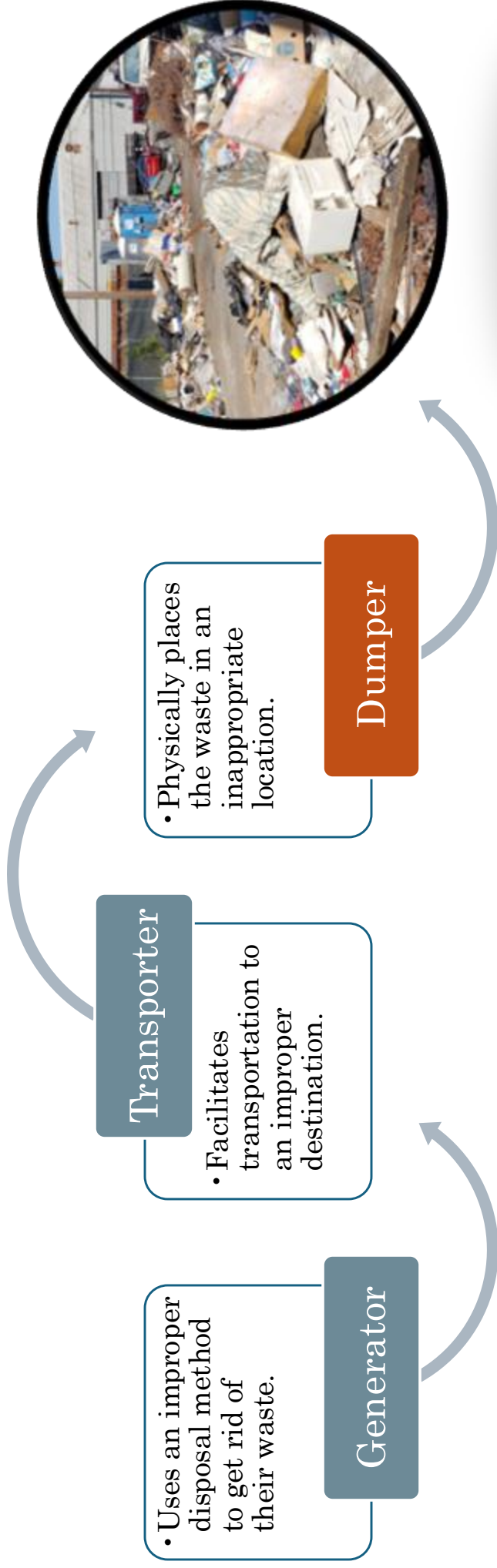
- *Willful, intentional, or negligent depositing, dropping, dumping, placing, or throwing of any waste matter onto public or private property that is not expressly designated for the purpose of disposal of waste matter.*
- *“Illegal dumping” does not include litter as defined herein.*

LITTERING IS AN INFRACTION

- *Discarding of small quantities of waste matter related to consumer goods and that are reasonably understood to be ordinarily carried on or about the body of a living person.*

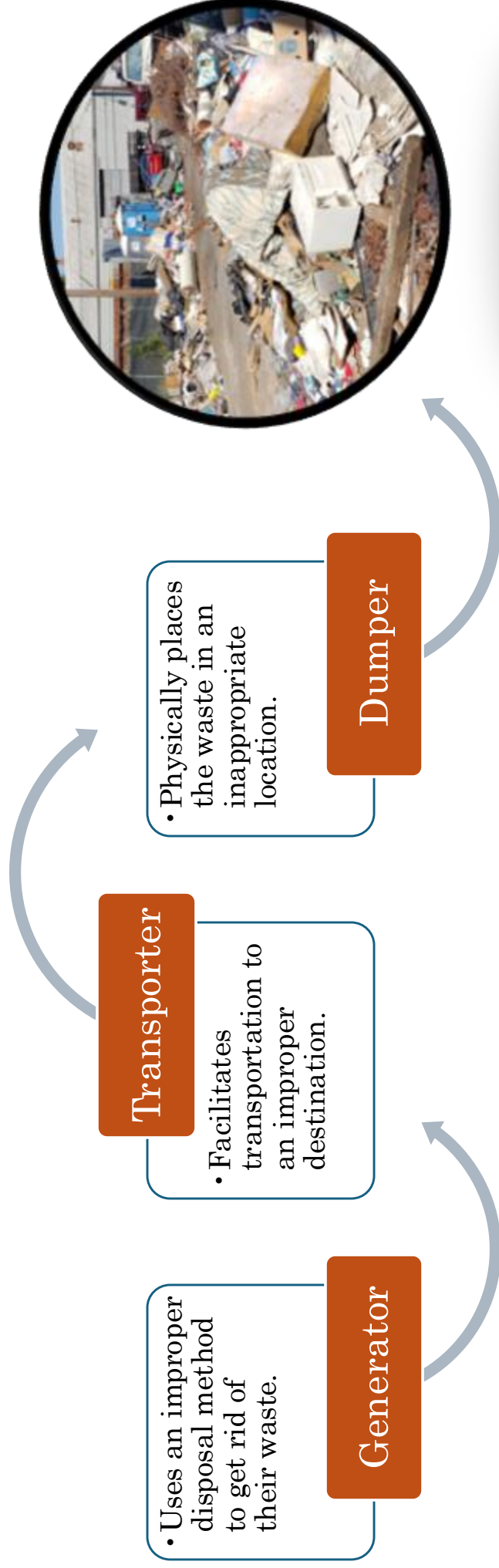
Expanding Accountability

Current Situation:



State law place accountability solely on the Dumper, creating loopholes for other participants and resulting in investigative dead ends -- even with evidence.

Model Ordinance:



The Model Ordinance expands the definition of a “Dumping Violator” to include the full spectrum of participants in illegal dumping.

DEFINITION: Dumping Violator



Generator: Any person who gives their waste to someone who then illegally dumps it.*



Transporter: Owner of the vehicle that was used to transport and dump the waste.**



Dumper: Any person who causes or permits waste matter to be illegally dumped.***

- * Exempts persons who hire a licensed waste removal business.
- ** Exempts vehicle owners whose vehicle was used without their consent.
- *** Exempts waste generated through ordinary course of living in an encampment.

Updating Penalties

Administrative Penalties: Fines

| STATE LAW CA Penal Code 374.3(e) |
|--|
| • 1 st Offense: \$250 - \$1,000 |
| • 2 nd Offense: \$500 - \$1,500 |
| • 3 rd Offense: \$750 - \$3,000 |

| PROPOSED FEE SCHEDULE |
|-------------------------------------|
| • 1 st Offense: \$2,500 |
| • 2 nd Offense: \$5,000 |
| • 3 rd Offense: \$10,000 |

AGGRAVATING FACTORS:

1. More than 10 cubic yard or 2,000 pounds of waste;
2. Includes “harmful waste materials”; or
3. Occurs within 150 feet of:
 - A water body, wetland, storm drain, or state/federally designated critical habitat or
 - A public or private K-12 school, preschool or childcare facility.

The Officer may assess higher penalty, regardless of prior violation count.

Administrative Penalties:

Failure to Abate

Failure to Abate:

- \$1,000 for a first violation;
- \$2,500 for a second violation;
- \$5,000 for each additional violation.

Cost of Remediation:

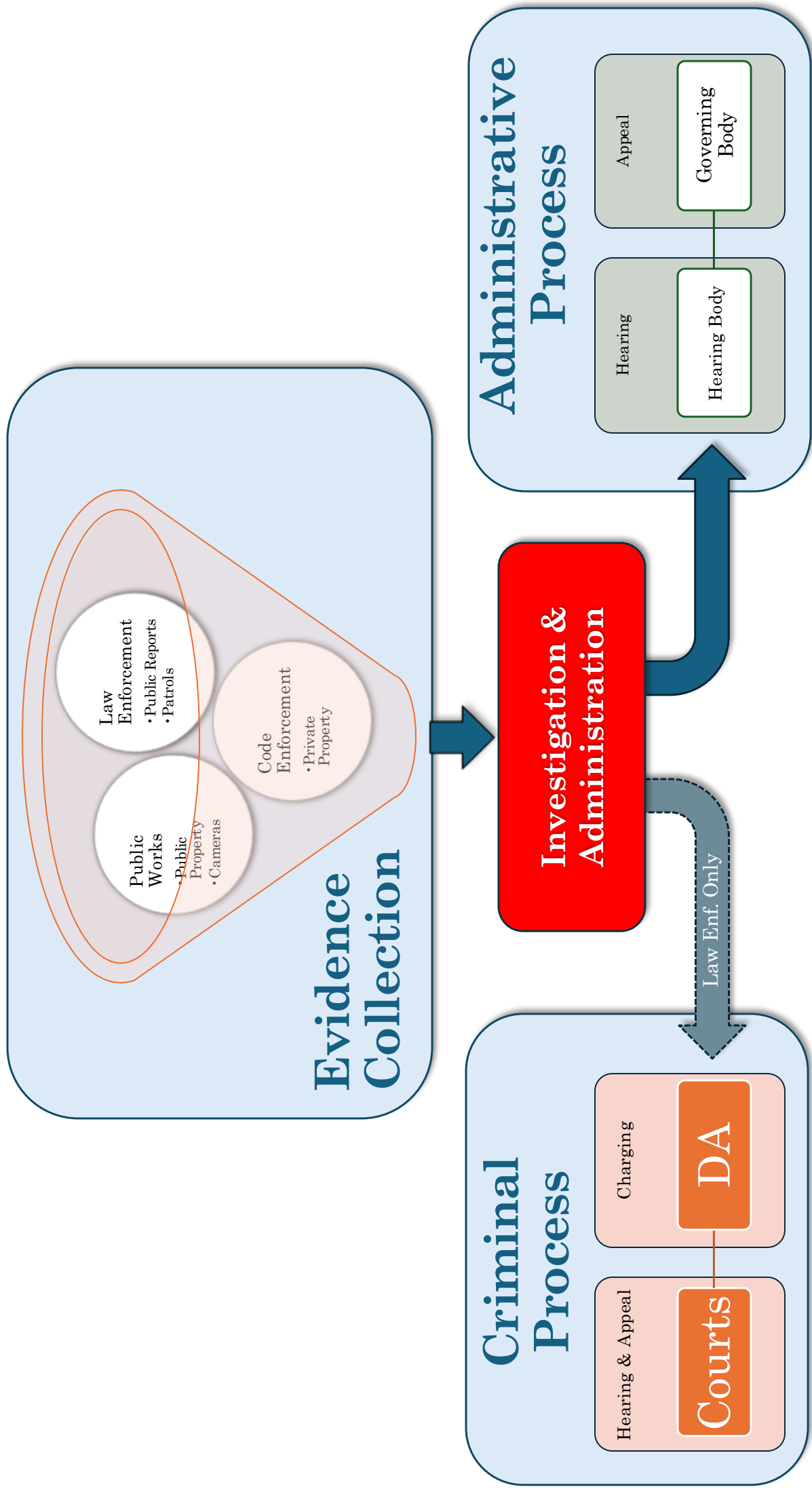
- The Jurisdiction may remediate the dump and bill the dumping violator for the complete cost of abatement.

Community Service:

- Dumping violators that cannot afford the penalties may apply for Community Service in Lieu of Fine.

Implementation Process

Recommended Processes:



What's next?

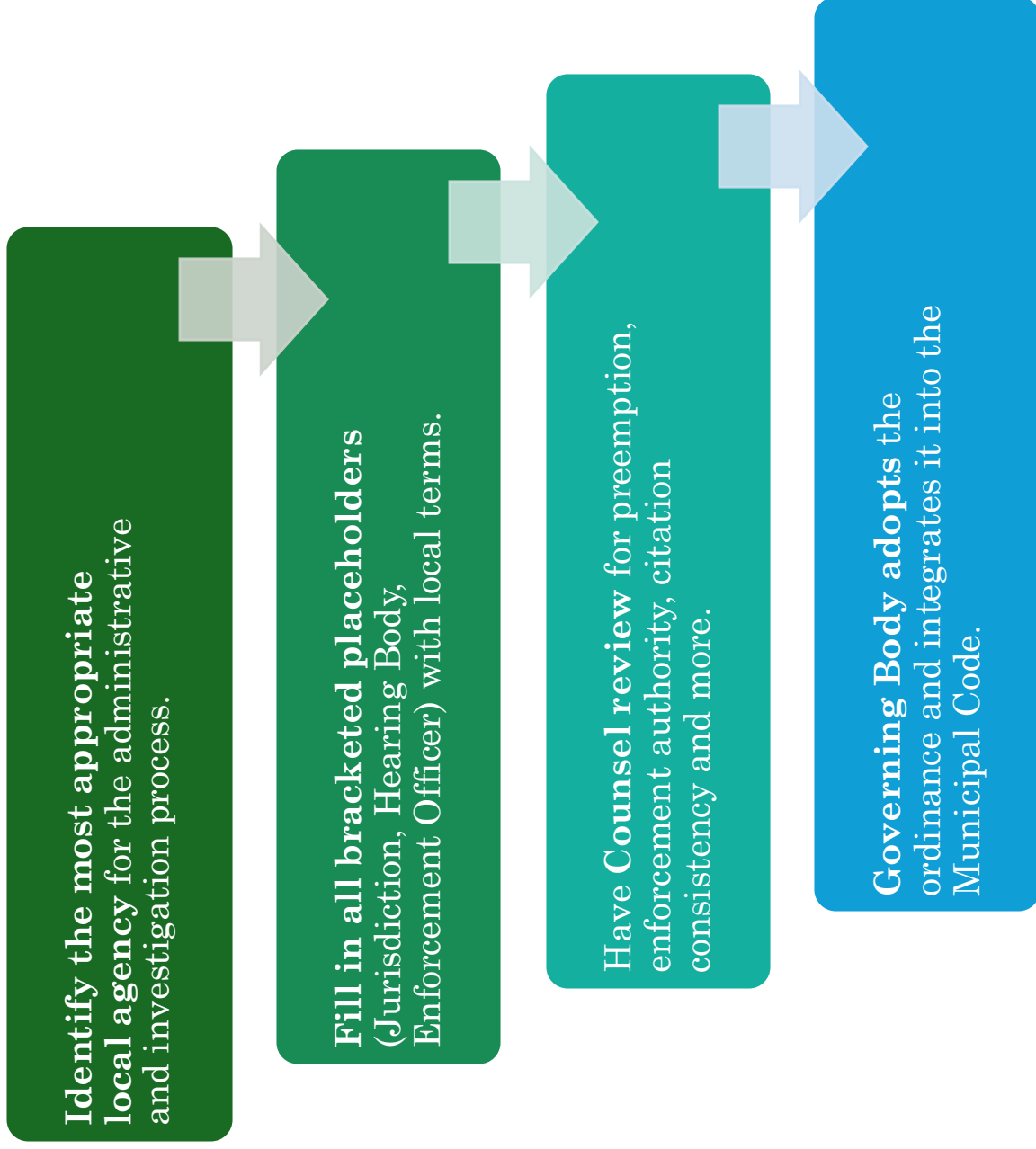
Download the Model Ordinance

Scan the QR Code to download.



Instructions:

This model ordinance is written for direct adoption by any city or county. Before adoption:





Thank You

From: CalRecycle <CalRecycle@public.govdelivery.com>
Sent on: Thursday, November 20, 2025 7:32:40 PM
To: sweetser@hazman.us
Subject: Notice of SB 1215 Covered Battery-Embedded Products Emergency Regulations

Rename file

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Notice of SB 1215 Covered Battery-Embedded Products Emergency Regulations

The Department of Resources Recycling and Recovery (CalRecycle) proposes to adopt emergency regulations that are necessary to implement, make specific, and clarify Senate Bill (SB) 1215 (Newman, Chapter 370, Statutes of 2022). The proposed emergency regulations will amend the California Code of Regulations (CCR), commencing with Section 18660.5, Chapter 8.2, Division 7 of Title 14. The proposed regulations clarify the SB 1215 statutory definition of “covered battery-embedded product” and include the following:

- Approved cancellation method for dismantling battery-embedded covered electronic waste (CEW);
- Requirements for battery-embedded CEW recycling payment claims;
- Reporting and notifications requirements for manufacturers of covered battery-embedded products;
- Necessary revisions for CalRecycle to successfully implement California’s CEW Recycling Program, including updates to CEW Recycling Program procedures such as net cost reporting requirements, and establishing reinstatement procedures and payment claim review procedures.

The proposed regulations also repeal requirements in Article 2.5 pertaining to manufacturer payments.

The public comment period permits any interested person, or their authorized representative, to submit written comments addressing the proposed amendments. Written comments that offer recommendations, objections, support for, or opposition to the proposed amendments should indicate the amended section(s) to which the comment or comments are directed. The public comment period will commence on **December 01, 2025**, when the SB 1215 Covered Battery-Embedded Products emergency regulations are posted on Office of Administrative Law’s (OAL’s) website. The public comment period will close on **December 08, 2025**.

Comments on the proposed emergency regulations must be submitted directly to OAL within the comment period stated above. You may submit comments to the OAL Reference Attorney through one of methods listed in the following section:

Department of Resources Recycling and Recovery

SB 1215 Covered Battery-Embedded Products Emergency Regulations

NOTICE OF PROPOSED EMERGENCY ACTION

NOTICE IS HEREBY GIVEN that the Department of Resources Recycling and Recovery (CalRecycle) is proposing emergency regulations to amend sections 18660.5, 18660.6, 18660.7, 18660.8, 18660.9, 18660.10, 18660.16, 18660.17, 18660.19, 18660.20, 18660.21, 18660.22, 18660.24, 18660.25, 18660.30, 18660.31, 18660.32, 18660.34, 18660.41, and 18660.49, and adopt sections 18660.26, 18660.41.1, and 18660.41.5, Chapter 8.2, Division 7, Title 14, of the California Code of Regulations (CCR) to clarify the statutory definition of “covered battery-embedded product” and establish requirements for battery-embedded covered electronic waste (CEW) recycling payment claims, including specifying an approved cancellation method for dismantling battery-embedded CEW, update procedures within the CEW Recycling Program, including net cost reporting requirements and establishing reinstatement procedures, reconsideration procedures, and payment claim review procedures, and describe reporting and notification requirements for manufacturers of covered battery-embedded products, among other necessary revisions for the state to successfully implement California’s CEW Recycling Program (Program).

CalRecycle also proposes repealing the regulations in Article 2.5 pertaining to manufacturer payments, which includes sections 18660.35, 18660.36, 18660.37, 18660.38, and 18660.39. The amendments in sections 18660.5, 18660.6, 18660.7, 18660.8, and 18660.9 correspond with these repealed regulations.

CalRecycle has complied with the requirement to provide notice of the proposed emergency rulemaking pursuant to Government Code section 11346.1(a)(2) and Title 1, CCR, section 50(b)(3)(A).

In compliance with Title 1, CCR, section 48, the following statement is included in this document: Government Code section 11346.1(a)(2) requires that, at least five working days prior to submission of the proposed emergency action to the Office of Administrative Law (OAL), the adopting agency provide a notice of the proposed emergency action to every person who has filed a request for notice of regulatory action with the agency. After submission of the proposed emergency regulation to OAL, OAL shall allow interested people five calendar days to submit comments on the proposed emergency regulations as set forth in Government Code section 11349.6.

The five-calendar day written comment period permits any interested person, or their authorized representative, to submit written comments addressing the proposed emergency amendments to CalRecycle. Written comments, which offer a recommendation and/or objection, or support the proposed amendment, should indicate the amended section to which the comment or comments are directed.

Comments on the proposed emergency regulations must be submitted directly to OAL within five calendar days of when OAL posts the proposed emergency regulations on the OAL website. Comments on proposed emergency regulations should be submitted to the OAL Reference Attorney by mail to 300 Capitol Mall, Suite 1250, Sacramento, California 95814, by fax to (916) 323-6826, or by e-mail to staff@oal.ca.gov.

When submitting a comment to OAL, a copy of the comment must also be submitted to CalRecycle via:

Electronic Submittal: [SB 1215 Covered Battery-Embedded Products Regulations Formal Comment Period](#)

OR

Postal Mail:

Donnet McFarlane
Covered Battery-Embedded Products Emergency Regulations
Department of Resources Recycling and Recovery, Regulations Unit
1001 "I" Street, MS-24B
Sacramento, CA 95814

OAL will confirm that CalRecycle has received the comment before considering it. The comment must state that it is about an emergency regulation currently under OAL review and include the topic of the emergency.

The public comment period will commence on December 1, 2025, when the emergency regulations are posted on OAL's website. The public comment period will close on December 8, 2025. **Written comments should be sent to OAL and CalRecycle and received before the close of the public comment period, no later than December 8, 2025.** Additionally, CalRecycle requests that written comments reference a subsection or section of the proposed emergency action.

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.

Copies of the proposed regulation text, the Finding of Emergency, and all of the information upon which this proposal is based are available upon request and on CalRecycle's website accessible at the following internet address: www.calrecycle.ca.gov/Laws/Rulemaking/.

The rulemaking file is also available for review during normal business hours at CalRecycle, 1001 I Street, 23rd Floor, Sacramento, California. Please contact the agency contact person, Donnet McFarlane at (916) 327-0092 or regulations@calrecycle.ca.gov, if you wish to review the rulemaking file in person.

General or substantive questions regarding this file may also be directed to Donnet McFarlane.

FINDING OF EMERGENCY

The adoption of these regulations is deemed to be an emergency pursuant to Public Resources Code (PRC) section 42475.2, which provides that:

- (a) CalRecycle and the Department of Toxic Substances Control (DTSC) may each adopt regulations to implement and enforce this chapter as emergency regulations.
- (b) The emergency regulations adopted pursuant to this chapter shall be adopted in accordance with Chapter 3.5 (commencing with section 11340) of Part 1 of Division 3 of Title 2 of the Government Code, and for purposes of that chapter, including section 11349.6 of the Government Code, the adoption of these regulations is an emergency and shall be considered by the Office of Administrative Law as necessary for the immediate preservation of the public peace, health, safety, and general welfare. Notwithstanding Chapter 3.5 (commencing with section 11340) of Part 1 of Division 3 of Title 2 of the Government Code, any emergency regulations adopted by CalRecycle or DTSC pursuant to this section shall be filed with, but not be repealed by, the Office of Administrative Law and shall remain in effect for a period of two years or until revised by DTSC or CalRecycle, whichever occurs sooner.

FINDING OF NECESSITY

Senate Bill (SB) 1215 (Newman, Chapter 370, Statutes of 2022) amended and expanded the Electronic Waste Recycling Act (“the Act”) of 2003 (Public Resources Code (PRC), section 42460, et seq.) by adding covered battery-embedded products to the definition of covered electronic devices that qualify for recovery and recycling payments pursuant to the Program. On April 1, 2026, CalRecycle may begin accepting payment claims for battery-embedded CEW recovered and recycled on and after January 1, 2026, pursuant to PRC section 42478(b)(2).

PRC section 42466.2 requires that, on or before July 1, 2025, a manufacturer of a covered battery-embedded product shall send a notice to any retailer in California that sells that device and notify the retailer that the device is subject to a covered battery-embedded waste recycling fee, as prescribed in PRC section 42464. The manufacturer must send a copy of this notice to CalRecycle (PRC section 42466.2(b)).

CalRecycle proposes amending the following sections in Title 14, CCR, Division 7, Chapter 8.2:

Section 18660.5 will be amended to add definitions for “Battery Chemistry,” “Commonly used household tools” or “common household tools,” “Covered Battery-Embedded Product” or “CBEP,” “Designed to be easily removed from a product by the user of the

product, with no more than commonly used household tools,” “Motor vehicle,” “Non-CRT CEW” or “non-CRT containing CEW,” and “Weighmaster.” Section 18660.5 will be amended to revise the definitions of “California Source,” “Covered Electronic Waste” or “CEW,” and “Proof of Approval.” These amendments are necessary to implement the Program authorized by the Act. This section will also be amended to remove the definitions for “Manufacturer Payment,” “Manufacturer Take Back Payment,” “Manufacturer Payment Claim,” “Manufacturer Take Back,” and “Registered Manufacturer” because the regulations in Article 2.5 pertaining to manufacturer payments will be repealed.

Section 18660.6 will be amended to clarify that there are limitations on the types of CEW for which approved collectors, recyclers, and dual entities may claim recovery or recycling payments. This amendment is necessary to ensure that only CEW as specified in the Chapter and authorized by the Act, that were used in California by a California Source, may be claimed for payments. This section will also be amended to remove requirements pertaining to manufacturer payments because the regulations in Article 2.5 pertaining to manufacturer payments will be repealed.

Section 18660.7 will be amended to remove requirements pertaining to manufacturer payments because the regulations in Article 2.5 pertaining to manufacturer payments will be repealed.

Section 18660.8 will be amended to clarify that the recordkeeping requirements apply to approved dual entities, and to remove requirements pertaining to manufacturer payments because the regulations in Article 2.5 pertaining to manufacturer payments will be repealed.

Section 18660.9 will be amended to clarify that the audit requirements apply to approved dual entities, and to remove requirements pertaining to manufacturer payments because the regulations in Article 2.5 pertaining to manufacturer payments will be repealed.

Section 18660.10 will be amended to require CalRecycle, or a person authorized by CalRecycle, to annually conduct net cost report surveys of approved collectors, recyclers, and dual entities to determine the average net costs associated with recovering and recycling CEW, and to adjust the Standard Statewide Combined Recovery and Recycling Payment Rates. This amendment is necessary to more accurately and completely quantify the average net costs for participants in the Program to manage CEW so as to ensure the payment rates, which are paid from consumer fees remitted to the Electronic Waste Recovery and Recycling Account, are set appropriately.

Section 18660.16 will be amended to clarify that the application requirements, as specified, apply to dual entities as a type of eligible Program participant. The proposed amendments add an expiration date for renewal applications and identify a mailbox where Participants may withdraw their application. These amendments are necessary to implement the Program authorized by the Act.

Section 18660.17 will be amended to reference and provide additional clarity regarding CalRecycle's discretion to deny any application, or revoke, or suspend the approval of a participant for submitting fraudulent information or documentation regarding net cost requirements, or for failing to comply with California Department of Food and Agriculture (CDFA) and/or California Department of Toxic Substances Control (DTSC) requirements. Additional amendments include clearer and more specific language regarding applications that include the name of an individual who has a history of fraudulent conduct or a demonstrated pattern of operation in conflict with statute and regulations, and specifying circumstances that allow a suspended participant to be reinstated if the participant is eligible for reinstatement and certain requirements are met. These amendments are necessary to implement the Program authorized by the Act.

Section 18660.19 will be amended to include a new process that allows participants to request reconsideration of a denied application or application renewal, suspension, or revocation by submitting a written request for reconsideration electronically. These amendments are necessary to provide Program participants with an informal process that offers the opportunity to expeditiously resolve matters prior to requesting an appeal. Section 18660.20 will be amended to add battery-embedded CEW to the collection log required to be maintained by an approved collector. This amendment is necessary to clarify documentation requirements for submission of information regarding covered battery-embedded products, pursuant to PRC section 42478(b)(2).

Section 18660.21 will be amended to specify that approved recyclers or dual entities shall follow the requirements in Chapter 7 (commencing with section 12700) of Division 5 of the Business and Professions Code and all applicable laws and regulations when weighing CEW and treatment residuals derived from the cancellation of CEW, and to clarify how to document those weights. Additionally, section 18660.21 will be amended to add weighmaster certificates as applicable records for shipments of treatment residuals. These amendments are necessary to clarify approved recycler and dual entity business requirements to be eligible to receive payments.

Section 18660.22 will be amended to specify requirements for shipping hazardous treatment residuals prior to submitting a recycling payment claim to CalRecycle. This amendment is necessary to correct the order of steps for submitting recycling payment claim information to CalRecycle to ensure technical accuracy and consistency, which promote clarity in the effect and understanding of the regulations.

Section 18660.24 will be amended to delete an example calculation for recycling payment claims to demonstrate cancellation of CRT-containing CEW. This calculation is redundant and, as a result, is unnecessary text. The proposed amendments also require weighmaster certificates documenting the weights of individual shipments of hazardous treatment residuals. These amendments are necessary to clarify recycling payment claim requirements.

Section 18660.25 will be amended to delete an example calculation for recycling payment claims to demonstrate cancellation of non-CRT-containing CEW. This

calculation is redundant and, as a result, is unnecessary text. The proposed amendments also require weighmaster certificates documenting the weights of individual shipments. These amendments are necessary to clarify recycling payment claim requirements.

Section 18660.30 will be amended to include a CalRecycle recycling payment claim completeness review process, as specified. This amendment is necessary to improve recycling payment claim accuracy and reduce CalRecycle staff review time.

Section 18660.31 will be amended to include a process to allow Program participants to request reconsideration of a denied or adjusted recycling payment claim by submitting a written request for reconsideration electronically. These amendments are necessary to provide Program participants with an informal process that offers the opportunity to expeditiously resolve matters prior to requesting an appeal.

Section 18660.32 will be amended to specify the cancellation method that approved recyclers must use to dismantle battery-embedded CEW to be eligible to receive the standard statewide combined recovery and recycling payment for battery-embedded CEW and clarify that motor vehicles may not be cancelled. This amendment is necessary to clarify documentation requirements for submission of information regarding covered battery-embedded products, pursuant to PRC section 42478(b)(2).

Section 18660.34 will be amended to add the Standard Statewide Combined Recovery and Recycling Payment Rate for battery-embedded CEW. This amendment is necessary to clarify the payment rate for collecting and recycling battery-embedded CEW, pursuant to PRC sections 42478(b)(2) and (c)(2).

Section 18660.41 will be amended to specify reporting requirements of manufacturers of covered video display devices, as well as to clarify how those manufacturers should identify information they consider and want to be treated as confidential, trade secret, or proprietary. These amendments are also necessary to distinguish the reporting requirements for video display devices and manufacturers from the reporting requirements for covered battery-embedded products and manufacturers, pursuant to PRC section 42465.2.

Section 18660.49 will be amended to delete the definition reference for Proof of Designation. This reference is unnecessary since the reference is to a defined term and deleting it will help to promote clarity and ensure it remains accurate.

CalRecycle proposes adding the following sections to Title 14, CCR, Division 7, Chapter 8.2:

Section 18660.26 will be added to specify additional requirements for recycling payment claims to demonstrate cancellation of battery-embedded CEW. This adoption is necessary to clarify documentation requirements for submission of information regarding battery-embedded CEW, pursuant to PRC section 42478(b)(2).

Section 18660.41.1 will be added to specify the reporting requirements for manufacturers of covered battery-embedded products. This amendment is necessary to

clarify documentation requirements for submission of information regarding covered battery-embedded products, pursuant to PRC section 42467.

Section 18660.41.5 will be added to specify requirements related to the notice that manufacturers of covered battery-embedded products must send to retailers, pursuant to PRC section 42466.2(b). This adoption clarifies the submission process regarding the copy of those notices that manufacturers must provide to CalRecycle, and specifies the date of August 1 as the annual deadline by which copies of the notices must be provided to CalRecycle.

CalRecycle proposes repealing Article 2.5 in Title 14, CCR, Division 7, Chapter 8.2:

Article 2.5 pertaining to manufacturer payments, which includes sections 18660.35, 18660.36, 18660.37, 18660.38, and 18660.39 will be repealed. PRC section 42476(i)(1) states: *“CalRecycle may make a payment to a manufacturer that takes back a covered electronic device from a consumer in this state for purposes of recycling the device at a processing facility. The amount of the payment made by CalRecycle shall equal the value of the covered electronic waste recycling fee or the covered battery-embedded waste recycling fee, as applicable, paid for that device...”*

Although CalRecycle has historically allowed manufacturers of video display devices to register and submit manufacturer payment claims, no video display device manufacturer has ever taken advantage of this allowance. Since the Act requires that the amount of the payment made by CalRecycle to manufacturers must equal the value of the covered electronic waste recycling fee paid for the device, any Program implementation of this provision would be problematic because no funding is allocated to CalRecycle to perform the work associated with registering manufacturers to participate, reviewing manufacturer payment claims, or making payments to manufacturers. For these reasons, CalRecycle proposes repealing the regulations in Article 2.5 pertaining to manufacturer payments, which includes sections 18660.35, 18660.36, 18660.37, 18660.38, 18660.39. In addition, CalRecycle proposes amending the regulations pertaining to manufacturer payments in sections 18660.5, 18660.6, 18660.7, 18660.8, 18660.9 to remove any existing regulation text associated with payments to manufacturers.

TECHNICAL, THEORETICAL, AND/OR EMPIRICAL STUDY, REPORT OR DOCUMENTS RELIED UPON

CalRecycle utilized the following sources in the development of the proposed regulations:

- Attachment 1: Economic and Fiscal Impact Statement (STD 399)
- Attachment 2: STD 399 Supplemental Information
- Attachment 3: 2023-2024 Budget Change Proposal Cover Letter 3970-020-BCP-2023-GB
- Attachment 4: State of California – Civil Service Pay Scale, accessed (June 2, 2025

OTHER MATERIAL IN RULEMAKING FILE

- Attachment 5: Evidence of collaboration with the Department of Toxic Substances Control – Email dated August 13, 2025.

AUTHORITY

These regulations are submitted pursuant to CalRecycle's authority under PRC sections 40502, 42466.2, 42467, 42474, 42475, and 42475.2.

REFERENCE

PRC sections 42463, 42464, 42465.2, 42466.2, 42467, 42472, 42474, 42475, 42476, 42477, 42478, and 42479; Business and Professions Code section 12700; Government Code sections 11400.20 and 11415.10.

INFORMATIVE DIGEST

Summary of Existing Laws and Effect of the Proposed Action

The Act established the Program to promote the efficient, cost-effective, and compliant collection and processing of certain video display devices to ensure that when discarded and processed, these types of electronic waste would not pose a threat to public health and the environment. The Act requires California consumers to pay a CEW recycling fee at the point of retail sale for any covered video display device. Retailers then remit the fee to the California Department of Tax and Fee Administration, and the funds are placed in the Electronic Waste Recovery and Recycling Account (Account).

CalRecycle administers funds in the Account to provide payments to approved collectors and recyclers to offset the average net cost of compliantly collecting and processing CEW. DTSC also administers the Program by ensuring Program participants comply with hazardous waste laws and regulations and Program requirements. Additionally, CalRecycle works with CDFA to ensure Program participants comply with California weights and measures requirements.

In 2022, SB 1215 was signed into law, which amended and expanded the Act by adding covered battery-embedded products to the Program. The goal of SB 1215 is to add covered battery-embedded products, as defined in PRC section 42463(f), to the Program. The proposed regulations clarify the definition of "covered battery-embedded product," specify the approved cancellation method for dismantling battery-embedded CEW, establish the requirements for battery-embedded CEW recycling payment claims, clarify covered battery-embedded product manufacturer reporting requirements, update and clarify existing Program procedures, and make other conforming changes and updates to existing regulations.

SB 1215 requires that, on April 1, 2026, CalRecycle shall begin accepting payment claims for CEW, resulting from discarded battery-embedded CEW. (PRC section 42478(b)(2)). Existing regulations establish a process to provide payment to approved collectors, recyclers, and dual entities for the collection and processing, or cancellation, of CRT and non-CRT CEW. The proposed regulations enable approved collectors, recyclers, and dual entities to claim battery-embedded CEW for payment.

In order for an approved recycler to claim payment for processing CEW, regulations must establish an approved cancellation method. Currently, there are approved cancellation methods for CRT and non-CRT CEW. The proposed regulations add a cancellation method for battery-embedded CEW that will enable the safe processing of this material while maximizing resource recovery.

SB 1215 also requires that, beginning on July 1, 2027, manufacturers of covered battery-embedded products submit an annual report to CalRecycle that includes information about the products, such as embedded-battery chemistry and recycled materials contained within the device (PRC section 42467). Current regulations outline the requirements for reporting on covered video display devices. The proposed regulations add requirements for reporting on battery-embedded products.

SB 1215 requires that on or before July 1, 2025, and every year thereafter, covered battery-embedded product manufacturers must send a notice to retailers selling their products, informing them to charge a covered battery-embedded waste recycling fee at the time of retail purchase (PRC section 42466.2(a)). Manufacturers must send a copy of the notice to CalRecycle (PRC section 42466.2(b)). The proposed regulations inform manufacturers how and where to send the notice copy, and when the copy is due.

The proposed regulations amend existing requirements for reporting costs and revenues to collect and process CEW. Existing regulations require approved collectors and recyclers to report costs and revenues on or before March 1, annually. The proposed regulations eliminate the annual requirement for Program participants to submit Net Cost Reports to CalRecycle and instead CalRecycle, or a person authorized by CalRecycle, will conduct annual net cost surveys to which participants must respond. Participants will be required to provide cost and revenue information to CalRecycle, or to CalRecycle's authorized representative, and provide records to substantiate the cost and revenue information that is provided.

The proposed regulations amend existing administrative procedures related to participation in the Program and review of payment claims. Proposed reinstatement procedures identify certain circumstances in which a suspended participant shall be eligible for reinstatement if certain requirements are met. The proposed regulations include a new process that allows participants to request reconsideration of a denied application or application renewal, suspension, or revocation by submitting a written request for reconsideration electronically. For proposed claim review procedures, the regulations include a process by which incomplete claims will be returned to the participant if CalRecycle determines that required information is missing.

Policy Statement Overview/Anticipated Benefits of Proposal

The goal of SB 1215 is to add covered battery-embedded products, as defined in PRC section 42463(f), to the Program so that battery-embedded CEW is recovered in California and safely managed. The proposed amendments will provide the following anticipated benefits:

- Provide sufficient funding for the safe, cost-free, and convenient collection and recycling of the CEW discarded in the state,
- Attempt to end the illegal disposal and/or improper management of CEW,
- Increase transparency in business and government, and
- Promote increased recycling of CEW.

Consistency and Compatibility 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

No documents or forms are incorporated by reference in the proposed regulation.

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 SECTIONS 11346.1(b) AND 11346.5(a)(4))

CalRecycle has determined that no other matters, as prescribed by statute, need to be addressed. CalRecycle complied with PRC section 42475, which requires CalRecycle to consult with DTSC to administer and enforce the Act. CalRecycle consulted and collaborated with DTSC via meetings and email communications (Attachment 5).

MANDATES ON LOCAL AGENCIES OR SCHOOL DISTRICTS

CalRecycle has determined that the proposed regulations do not impose a mandate on local agencies or school districts.

FISCAL IMPACT

Local Agencies or School Districts Subject to Reimbursement

CalRecycle has determined that the proposed regulations do not result in costs to any local agency or school district that must be reimbursed pursuant to section 6 of Article

XIII B of the California Constitution and Part 7 of Division 4 of the Government Code section 17500 et seq.

Cost or Savings to Any State Agency

The total cost to CalRecycle is estimated at \$8,012,721. DTSC provided information to CalRecycle specifying that the total cost to DTSC is \$1,809,000 in fiscal years 2025/2026 through 2027/2028. Therefore, the total cost to the state to implement the proposed regulations is estimated at \$9,821,721, which will be incurred by CalRecycle and DTSC as described in Attachments 3 and 4.

Non–Discretionary Cost or Savings Imposed Upon Local Agencies

CalRecycle has determined that there are no non– discretionary costs or savings imposed upon any local agencies.

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.



November 10, 2025

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

Submitted electronically to: <https://ww2.arb.ca.gov/lispub/comm/bclist.php>

RE: Comments Regarding Proposed Amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills

To Whom It May Concern:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to provide comments on the Air Resources Board's (ARB's) proposed amendments to the landfill methane regulation (LMR). These comments are intended to supplement, not supplant the comments contained in a joint industry/public agency coalition letter. RCRC is an association of forty rural California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties.

Our member counties operate and/or maintain both open and closed public landfills. A large majority of our member counties operate landfills currently subject to the LMR landfill gas collection and control system requirements; however, many of our counties operate landfills with under 450,000 tons of waste-in-place. As county governments, our members are also keenly interested in protecting public health and safety and ensuring that subsurface smoldering and elevated temperatures like those occurring at Chiquita Canyon Landfill are detected early and remediated as quickly as feasible.

RCRC welcomes the opportunity to update the LMR to facilitate the use of emerging technologies to monitor and respond to emissions at landfills. While we support many of the proposals included in the regulatory package, we believe a number of revisions are required to make it implementable, avoid unnecessary burdens, and provide the flexibility that public facility owners/operators need.

Proposed Changes to Exemptions and Requirements for Landfills With Less Than 450,000 Tons Waste-in-Place Should Be Revised

Section 95462 (b) changes the scope of the exemption for landfills that only “receive” construction and demolition wastes, inert wastes, or non-decomposable wastes by limiting the exemption to those facilities that “contain” only these waste types. Wastes contained within sites that may have once received other types of waste likely do not contain enough organic materials to generate methane emissions. As a result, the proposed regulatory expansion is unwarranted and will have little, if any, environmental benefit.

Section 95463 subjects landfills with less than 450,000 tons waste-in-place and that install a gas collection and control system to the full scope of the proposed regulations. These smaller landfills may not have sufficient landfill gas to maintain continuous gas collection and control and can only operate intermittently. Unfortunately, intermittent operation of a gas collection and control system is not adequately considered in the proposed regulations. Under existing law, these active MSW landfills with less than 450,000 tons waste-in-place are only required to submit a waste-in-place report and maintain the system. Imposing the full scope of the regulatory requirements on smaller landfills will disincentivize owners/operators from installing a landfill gas collection and control system.

The Economic Analysis in Appendix B does not reflect the impact of the proposed regulations on these smaller landfills. The cost per ton of implementing the proposed regulations on these smaller landfills is significantly greater than larger sites and would make voluntary installation and operation of a gas collection and control system unaffordable.

Maintaining the current ability for active landfills with less than 450,000 tons waste-in-place to continue to submit the annual waste-in-place report would better incentivize the voluntary installation of gas collection and control systems before exceeding the 450,000 tons waste-in-place threshold.

For these reasons, ARB should instead continue to allow active MSW landfills with less than 450,000 tons waste-in-place to submit the annual waste-in-place report.

The Calculation of Heat Input Capacity for Uncontrolled MSW Landfills Should Allow Site Specific Values

Under the proposed regulations, uncontrolled MSW landfills shall submit an Annual Uncontrolled Landfill Report to the Executive Officer, which includes a calculation of the landfill gas heat input capacity based upon the formula in Appendix I. That formula in Tables 2A and 2B is based upon Facility and Disposal-Based Characterization of Solid Waste in California conducted by CalRecycle and its predecessor the California Integrated Waste Management Board. These values are based upon average compositions of various landfills. As jurisdictions implement the organics diversion

programs associated with CalRecycle's SB 1383's regulations, the organics compositions will decrease and result in less methane-generating materials being disposed in landfills. Some of these jurisdictions are conducting site specific waste characterization studies at the landfill that would be more valid than the standard values used in Appendix I.

For this reason, the proposed regulations should provide an option to use site specific waste characterization when calculating the landfill gas heat input capacity.

Deadline for Completion of Component Leak and Cover Monitoring Plans Should be Clarified

Section 95464(b)(5) and (6) require owners or operators to develop a component leak monitoring plan and cover integrity monitoring plan within 90 days after the effective date of the regulation. If a local agency lacks the internal capacity to prepare those reports itself, it may seek to have a consultant prepare those plans. In that case it is unlikely that 90 days would be enough time for a public agency to request proposals, obtain approval of the elected local governing body for the funds, select a consultant, and leave the consultant enough time to prepare the plans. *For this reason, we suggest providing owners/operators at least 180 days to prepare and begin implementing these plans.*

120-Hour System Downtime Is Unrealistic and Must Accommodate Situations Beyond the Facility's Control

Section 95464(b)(1)(A)(2) requires owners/operators to limit gas control system downtime to 120 hours in a calendar year. While we understand and agree with ARB's intent to minimize system downtime, this limit is unrealistic in many of the areas in which rural landfills are located and far more restrictive than the most aggressive air pollution control district regulations.

California has seen a dramatic decline in energy reliability over the last few years, particularly rural areas in Pacific Gas and Electric's service territory. Some communities continue to experience planned Public Safety Power Shutoffs (PSPS) that can last one or more days. Far more common are the more than 2,000 Enhanced Powerline Safety Settings (EPSS or Fast Trip) shutoffs that occur each year in PG&E territory. These EPSS shutoffs often last several hours to a full day. Some circuits have experienced 30 outages in a single year and up to 9 outages in a 30-day period. Our member counties have also experienced power outages related to lightning strikes on utility infrastructure, cars crashing into utility poles, severe storms that damage utility infrastructure, and wildfires. These outages often take utilities several hours to a few days to address before power is restored. Wildfire-related outages can last even longer. Unfortunately, the proposed regulations fail to anticipate or accommodate these types of events that are beyond the control of the owner/operator.

For these reasons, RCRC strongly urges ARB to modify the proposal to limit system downtime to 240 hours in a calendar year and specify that system downtime

resulting from power outages or disasters that are beyond the control of the owner/operator do not count towards those limits.

Timeframe for Installation and Operation of Gas Collection and Control System Must Be Adjusted

Section 95464(a)(3) reduces the time an owner/operator of an active landfill has to install and operate a gas collection and control system from 18 months to six months after the system design plan is approved.

While we understand ARB's interest in expediting system installation, RCRC is deeply concerned that six months is not enough time for a public agency to comply with existing state contracting and procurement laws to issue proposals, select a contractor, and construct the system. Some landfills are impacted by adverse weather conditions that limit construction season to limited times of year that could delay installation of a gas collection and control system. In addition, some gas collection and control systems may require changes to the Solid Waste Facility permit which will trigger a lengthy process for CalRecycle and the Regional Water Quality Control Board review – often at least 180 days. Adding to the complexity, many rural county facilities are owned by different federal or local agencies whose approval may be required and extend the project delivery timeframe. While private owners/operators are not subject to all of these requirements, we understand that six months may still be too aggressive a timeframe for them.

For these reasons, RCRC suggests retaining the 18-month project completion timeframe for public facilities or providing not less than a 12-month compliance window with an ability to extend that deadline for owners/operators making a good faith effort to comply.

Timeframe and Requirements for Initiating Corrective Actions Must be Clarified

Sections 95469(a)(1)(B) and (2)(B) require owners/operators to initiate corrective actions triggered by surface emission monitoring within three calendar days of detecting the exceedance. Existing law simply requires correction and re-monitoring to occur within ten days of detecting the exceedance.

While we understand and support ARB's intent to expedite the timeframe in which corrective actions are taken, we are concerned about what "initiate" means in light of the three calendar day window. Three calendar days may simply not be enough time to get a consultant or contractor out to landfills located in rural areas. While owners/operators can certainly reach out to consultants and contractors within three days to schedule diagnostic and remedial actions, it may be very difficult to have the actual response action begun within three calendar days of detection.

For this reason, RCRC suggests that ARB clarify in the Final Statement of Reasons that "initiate" may include the process of reaching out to an individual to perform the remedial action. This would not change the existing requirement that actions be

completed and re-monitored within ten days of detecting the exceedance, but would instead recognize the operational realities and challenges of operating facilities in rural areas.

Trigger for Installing Horizontal Collectors or Caisson Wells Must Be Clarified

Section 95464(a)(5) requires an owner/operator of a landfill that accepted at least 200,000 tons of solid waste per year in any of the three prior calendar years to install horizontal collectors or caisson wells in areas of new waste placement. RCRC is concerned that the 200,000 ton trigger is not limited to solid waste accepted for disposal, but could also include organic waste accepted for processing at an on-site composting facility, alternative daily cover materials, etc. We do not believe this is ARB's intent and so suggest clarifying that the trigger is 200,000 tons of solid waste accepted for disposal.

ARB Should Provide Flexibility for Alternatives to Requirement to Install Caisson Wells or Horizontal Collectors

For landfills that "accept" more than 200,000 tons of solid waste per year, Section 95464(a)(5) requires an owner/operator to install horizontal or caisson wells in areas of new waste placement after 15 vertical feet of solid waste has been placed over the collector or bottom of the well *and* positive pressure exists.

RCRC strongly urges ARB to provide additional flexibility for owners/operators to integrate early gas collection procedures. Horizontal collectors and caisson wells are just two of many options available and may not be suitable for use in all situations. Stakeholders have suggested that facilities may instead effectively collect from the leachate collection and control system, install collection layers in bottom liners, or use shallow vertical wells. Additionally, stakeholders have raised concerns that 15 feet of vertical depth may not be enough waste to prevent the well from pulling in ambient air and causing compliance problems with other aspects of the proposed rule.

Rather than impose prescriptive requirements, we suggest ARB provide greater discretion to the system engineer and operator as to what gas collection systems should be used and when they should be integrated into the system. Similarly, rather than only triggering system installation when a certain depth of waste is deposited, we suggest also providing a deadline-based option for owners/operators.

Another concern is related to the acceptance of disaster debris, which could result in a landfill that historically accepted less than 200,000 tons per year exceeding that threshold, possibly for two years in a row. That landfill would be required to install horizontal collectors, caisson wells, or other collection systems because of that unique situation. This additional gas system infrastructure would be a significant cost to add to a community already significantly impacted by the disaster. We recommend creating an exemption when the exceedance is due to disaster debris and unlikely to continue in perpetuity.

Requirements for Cover Integrity and Remediation are Over-Prescriptive and Will Create Additional Operational Challenges

Section 95471(k) imposes overly-prescriptive requirements for cover integrity assessment and remediation.

First, RCRC is concerned that the trigger for performing a cover integrity assessment is unreasonably low and could require an owner/operator to frequently conduct assessments several times a year.

Second, RCRC is concerned that the cover remediation requirements create regulatory overlap and risk further complicating an already complex regulatory environment. This will inhibit compliance. Overlapping regulatory authority among multiple state and federal regulatory agencies is partly to blame for some of the state's worst recent environmental challenges, including the Exide battery recycling facility and the Chiquita Canyon Landfill. Both disasters were exacerbated by an overly-complex regulatory environment without effective coordination among different agencies. That fragmentation can inhibit effective response actions once problems are detected. CalRecycle and local enforcement agencies (LEAs) already have regulatory and enforcement authority over landfill covers. Those covers are designed and approved in accordance with standards established by CalRecycle, the LEA, and (frequently) regional water control boards. Any changes to the covers may trigger additional regulatory review and approval by ARB's sister agencies, which will complicate compliance and completion. Corrective action measures proposed in the regulations could require a significant change to the solid waste facility permit that is subject to approval by CalRecycle and the Regional Water Quality Control Board.

Third, RCRC is concerned that Section 95471(k)(1) is overly prescriptive in terms of the types of remedial actions that must be performed in order for deficiencies to be considered corrected. Doubling the amount of material may be unnecessary to address the underlying cause of the exceedance, as may forcing the use of soil or intermediate daily cover in place of alternative daily cover. Furthermore, owners/operators cannot modify the final cover without first obtaining approval from other state, local, and/or regional agencies.

Rather than overly complicating the regulatory environment for cover maintenance, imposing arbitrary requirements (like doubling the required thickness of material), or undermining CalRecycle's regulatory authority by precluding the use of alternative daily cover, ARB should simply provide owners/operators with greater discretion as to how to remediate any cover deficiencies.

Notification Method for Remotely Detected Plumes Is Inadequate and Must Be Supplemented with Traditional Notice

Section 95469(b) inappropriately allows the Executive Officer to notify an owner/operator of a remotely detected methane emission plume by e-mail, which will trigger response and remedial actions.

To be clear, RCRC does not dispute expanding the LMR to integrate remote plume monitoring or requiring response and remedial actions when those exceedances are verified by the system owner/operator. RCRC appreciates and supports the utilization of newer technology to better identify and focus response and remedial actions. That being said, RCRC strongly objects to the method of notification in the proposed regulations.

An e-mailed notification does not provide sufficient notice, standing alone, to require owners/operators to perform expedited monitoring and mitigation. While e-mail notification may be helpful to prompt quick action, an e-mailed notice cannot and should not trigger a requirement to perform surface emissions and component leak monitoring within five days of receiving the e-mail. Local governments have high staff turnover and are often subject to electronic attacks. There is an unacceptably high risk that an official email from ARB would either go to an old e-mail, be caught in a spam filter, or otherwise go unnoticed. These risks are unique to e-mail notifications and are easily avoided with official mailed notifications. To provide adequate notice, the Executive Officer's e-mail must be sent in conjunction with an official mailed notice of the detection and instructions for required follow-up monitoring and remediation.

RCRC urges ARB to modify the proposed regulations to provide owners/operators at least 14 calendar days after an official notice is mailed to perform any required monitoring and remedial actions. An e-mail may be helpful to provide early notice so the facility can expedite monitoring and remediation, but must be supplemented by an official, mailed notice.

Process for Review and Repeal of Existing Alternative Compliance Measures is Troubling

RCRC is concerned by ARB's attempt to substantially shorten the list of examples of alternative compliance measures that may be issued by the Executive Officer. While the existing LMR contains six examples, the proposed regulations eliminate four of those and leave only two in place, including allowing owners/operators to require additional time for repairs or requesting alternative wind speed or precipitation requirements.

While we understand that the list in Section 95468 remains illustrative and is not limited to those enumerated examples, it is unclear why ARB is seeking to eliminate those alternative compliance options if they truly remain available to owners/operators. The ISOR seems to indicate that the changes are cleanup rather than substantive changes and that the "removed examples" are no longer necessary due to other changes in the proposed amendments. These statements are inconsistent and appear to signal that

ARB will be significantly limiting the types of alternative compliance measures available to owners/operators.

Some of the alternatives proposed for deletion are still necessary despite ARB believing they are no longer necessary in light of other regulatory changes. Alternative compliance measures are needed to provide flexibility and respond to specific conditions at a given site, so it is disturbing that ARB is trying to take some of those alternatives off the table. For example, the existing alternative (proposed for deletion) for “(1) Semi-continuous operation of the gas collection and control system due to insufficient landfill gas flow rates” is still needed. The only other mention of insufficient gas flow is in Section 95464 (b)(2)(B)2 for routing collected gas to an open flare. Insufficient gas flow can occur with control systems that are not open flares. Attempting to collect gas when there is insufficient gas flow can result in subsurface fires. The proposed allowance for semi-continuous operation is limited to closed landfills and so will be unavailable for active landfills with low gas volumes (exactly where the allowance is needed). The existing alternative (proposed for deletion) allowing “(4) Alternative walking patterns to address potential safety and other issues, such as: steep or slippery slopes, monitoring instrument obstructions, and physical obstructions” may be needed for field verification of remote monitoring measurements. Similarly, the existing alternative (proposed for deletion) allowing flexibility to discontinue surface inspection of construction areas and other dangerous areas may be needed on a case-by-case basis.

ARB should maintain the existing list of alternative compliance options to ensure regulatory responses can be tailored to site specific conditions when the proposed one-size-fits-all solution is inadequate. ARB should also specifically allow for the issuance of alternative compliance measures to address safety-related concerns.

Section 95468 effectively repeals all existing alternative compliance measures approved by either ARB or local air districts unless and until those measures are re-approved by ARB. The regulations require owners/operators to submit all information regarding previously approved alternative compliance options by April 1, 2027, with any alternatives not resubmitted repealed effective January 1, 2028. Local owners/operators may not be able to resubmit all materials contained in the initial application, as it is not clear there was any expectation or requirement that they retain those materials once the measure was approved. If the previously approved alternative compliance option is revoked, the Executive Director should be required to provide written reasons for the revocation similar to the current requirement to “provide written reasons for the denial” of a new requested alternative that is in Section 95468 (c)(1).

Aside from undermining the authority of local air districts that have already approved alternative compliance measures, these provisions effectively give ARB a second bite at the apple to create a one-size-fits-all regulatory approach that experience has often proven is inappropriate in a state with as much regional, climactic, and operational diversity as California.

At a minimum, the regulations should be modified to provide owners/operators with adequate time to come into compliance with changes to previously approved alternative compliance measures rather than requiring immediate compliance upon revocation. The regulations should also allow adequate time and establish a process to appeal a revocation.

More Flexibility Needed for Monitoring and Addressing Issues on the Working Face and Unsafe-to-Walk Areas

Section 95471(d) limits the procedures for Surface Emissions Screening Procedures for Unsafe-to-Walk Surface Areas. The Alternative Surface Emissions Monitoring Procedures in Section 95471(e) are limited to 95471 (c) for Surface Emissions Monitoring Procedures. More flexibility is needed for all monitoring requirements, especially in unsafe areas. Operators should be provided the opportunity to propose alternative monitoring equipment and methods including, but not limited to, those proposed in Section 95471 (e), which may include other remote sensing tools that can identify emissions from areas that are unsafe to walk even if those tools do not possess the same measurement capabilities as other methods noted in this section.

Temperature Triggers for Assessments Should Be Adjusted and Recalibrated

Exceedances of wellhead temperatures at 131 degrees Fahrenheit are not indicative of major gas collection system problems. As proposed in Section 95469 (e)(3), any well exceeding 131 degrees will require an extensive collection system assessment and cover integrity assessment and force a reductions in the oxygen content in the wellhead. These full assessments are not warranted based upon a single exceedance. Additional cover material can be used to fill in cracks and other surface openings, with remeasuring after a suitable period to determine whether the responses adequately resolved the issue. Continued exceedances may warrant additional measures such as a review of the area around the specific well.

While most landfills appear to operate with temperatures below 131 degrees, it appears that some operate normally at temperatures up to 145 degrees without causing any adverse internal or external consequences. It would be more appropriate for the full gas collection control system assessment and cover integrity assessment to be triggered by exceedances of the 145-degree Fahrenheit temperature threshold.

For these reasons, we recommend setting the threshold triggering assessments of the collection system and cover integrity, and oxygen content monitoring, at 145 degrees, rather than the 131 degrees currently proposed.

Regulations Contain Excessive Reporting and Notification Requirements

RCRC is concerned that the LMR revisions significantly increase reporting and notification requirements. We are particularly concerned that this increase in frequency

California Air Resources Board
Comments Regarding Proposed Amendments to the Regulation on Methane Emissions
from Municipal Solid Waste Landfills
November 10, 2025

and volume could have negative repercussions, including oversaturation causing desensitization and complacency among regulators.

For example, under the proposed regulations owners/operators of every facility must notify the Executive Office of the scheduled date of all quarterly surface emission monitoring events at least 15 calendar days prior to the event. This means that ARB will receive four notifications each year from each of the 153 controlled facilities for a total of over six hundred notifications a year. For what purpose? It seems far-fetched to think that ARB has the program staff or capacity to travel to even a small fraction of those facilities to observe quarterly monitoring. As such, this merely creates another regulatory burden on owners/operators with practically no benefit to the state other than to create opportunities for ARB to determine an owner/operator was noncompliant with the regulations by failing to provide adequate notice of the monitoring event.

RCRC strongly encourages ARB to carefully consider which monitoring and reporting obligations are of sufficient public interest to retain in the regulations and discard the rest – particularly the notification of scheduled surface emission monitoring.

Conclusion

RCRC appreciates your consideration of these comments and looks forward to working with you to resolve the issues we have raised. If you should have any questions, please do not hesitate to contact me at jkennedy@rcrcnet.org.

Sincerely,



JOHN KENNEDY
Senior Policy Advocate

Landfill Methane Regulation: Factsheet

CARB's role in regulating landfills

Methane is generated in landfills when microbes break down organic waste in the absence of oxygen. Methane is a potent greenhouse gas and a short-lived climate pollutant.¹ Taking action to reduce methane emissions will rapidly reduce concentrations in the atmosphere, slowing the pace of temperature rise in this decade. Landfills are the second largest source of methane emissions in California.

CARB's Landfill Methane Regulation is designed to reduce methane emissions by requiring the installation and operation of landfill gas collection and control systems (GCCS) that capture and destroy landfill gas. Controlling landfill gas also reduces emissions of co-pollutants found in trace quantities in landfill gas, such as toxic air contaminants, volatile organic compounds, and odorous compounds.

In addition to CARB, federal, State, and local agencies all play a role in regulating landfills including but not limited to:

- Local air districts in California play a lead role in regulating stationary sources of air pollution, including issuing permits for landfill GCCS. Local air districts regulate enclosed flares and other landfill gas combustion devices used to destroy methane and co-pollutants, and respond to nuisance and odor complaints.
- CalRecycle regulates solid waste handling, processing, and disposal activities to protect public health and safety and the environment by supporting solid waste local enforcement agencies.
- The State Water Resources Control Board and their nine Regional Water Quality Control Boards (collectively, the Water Boards) regulate discharges to land that could impact surface water and groundwater quality, including regulatory and permitting requirements for landfills.
- The Department of Toxic Substances Control regulates facilities for disposal of hazardous waste.
- U.S. EPA regulates emissions of volatile organic compounds from landfills through requirements similar to those in the LMR.

Authority granted to CARB in AB 32

CARB regulates methane emissions from landfills pursuant to authority granted by Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006.² AB 32 requires CARB to

¹ Methane has a relatively short atmospheric lifetime of 7 to 12 years.

² Núñez, Chapter 488, Statutes of 2006, codified as Health and Safety Code section 38500-38599.

adopt regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emissions reductions. The Board approved landfill methane capture in 2007, as one of nine discrete early action measures under AB 32. CARB then enacted the Landfill Methane Regulation (LMR) that became effective in 2010.

CARB's Landfill Methane Regulation

The LMR is designed to reduce methane emissions from municipal solid waste landfills. It requires owners and operators of certain landfills to install and optimally operate GCCS to capture and destroy methane in landfill gas. It additionally requires monitoring for methane leaks and GCCS performance parameters, fixing leaks and performance issues, and reporting data to CARB and local air districts.

Statewide, 188 landfills are subject to the LMR, 153 of which are required to operate a GCCS. The remaining 35 are subject to annual requirements to determine and report whether they meet the criteria that require installation of a GCCS. Approximately 60% of these landfills are actively accepting waste while the remaining 40% are closed.³ Of the 188 total landfills subject to the LMR, 48 are privately-owned and 140 are government-owned; however, because privately-owned landfills are larger on average, there is a similar total quantity of waste contained in privately-owned and government-owned landfills. Over 95% of the waste historically disposed in California is located in landfills that operate a GCCS.

Neither AB 32 nor the LMR alter other health and safety regulations and requirements at landfills

The LMR is separate from existing regulations and permits for municipal solid waste landfills from CalRecycle, the Water Boards, local air districts, and U.S. EPA. As described in section 95474 of the LMR,⁴ compliance with the LMR does not exempt entities from complying with other federal, State, or local law, or from permitting requirements. As directed by AB 32, the LMR is designed to complement, and not interfere with, ongoing efforts to achieve and enforce federal and state ambient air quality standards and to reduce toxic air contaminant emissions. Further, the regulation does not limit the authority and tools available to respective regulatory agencies to respond to violations or emergencies that fall within their jurisdiction and oversight.

³ Landfills continue to generate methane for decades after they stop accepting waste and therefore must continue to operate the GCCS after closure.

⁴ Cal. Code Regs., tit. 17, § 95474.

Why LMR updates are being proposed now

Since its adoption in 2010, California's LMR has served as the model for rules adopted by several other states and contains provisions more stringent than federal requirements.⁵ In 2021, the landmark United Nations Global Methane Assessment determined that methane mitigation is one of the best ways of limiting near-term warming and the most cost-effective strategies to achieve the Paris Agreement's 1.5° C target rely on reductions in methane emissions by 2030.⁶

California recognized the importance of reducing methane emissions with the passage of Senate Bill (SB) 1383 in 2016. SB 1383 established the State's goal to reduce methane emissions 40% from 2013 levels by 2030.⁷ Both diverting organic waste away from landfills and improving landfill gas collection and control have been key strategies identified in CARB's Scoping Plans to reducing waste sector emissions.^{8,9,10} CARB's 2022 Scoping Plan to Achieve Carbon Neutrality¹¹ identified strategies for achieving methane emissions reductions from landfills and determined that while reducing landfill disposal is the most effective means of achieving long-term methane reductions, reducing emissions from waste already in place at landfills is also critical to achieve near-term reductions.

Over the past decade, CARB has conducted and funded innovative research to better understand sources of methane emissions and advance the deployment of new technologies to detect emissions.^{12,13,14} The outcomes of this and other research, and the rapid development of emerging technologies, have revealed new opportunities to improve collection and control of methane emissions from landfills. For example, methane plume mapping studies have helped create an understanding of the role management practices

⁵ *California State Plan for Compliance with U.S. EPA's Landfill Emission Guidelines* | California Air Resources Board. See Appendix E: Comparison of the Major Provisions of the Emission Guidelines and California's Landfill Methane Regulation.

⁶ *Global Methane Assessment: Benefits and Costs of Mitigating Methane Emissions* ([unep.org](https://www.unep.org/global-methane))

⁷ Lara, Chapter 395, Statutes of 2016, codified as Health and Safety code sections 39730.5, 39730.6, 39730.7, and 39730.8; and Public Resources Code Chapter 13.1 (commencing with Section 42652) to Part 3 of Division 30.

⁸ *2008 Scoping Plan* | California Air Resources Board

⁹ *2013 Scoping Plan* | California Air Resources Board

¹⁰ *2017 Scoping Plan* | California Air Resources Board

¹¹ *2022 Scoping Plan* | California Air Resources Board

¹² *Methane Hotspots Research* | California Air Resources Board

¹³ *Estimation and Comparison of Methane, Nitrous Oxide, and Trace Volatile Organic Compound Emissions and Gas Collection System Efficiencies in California Landfills* | California Air Resources Board

¹⁴ *The California Methane Survey* (energy.ca.gov)

play in reducing methane emissions and informing new mitigation strategies.^{15,16} The State's \$100 million investment¹⁷ to purchase methane plume data from a commercial satellite company provides actionable information to find and fix the largest methane leaks across the State. The proposed updates to the LMR leverage these advances in technology and research. The proposed updates also benefit from CARB's and the air districts' experience implementing and enforcing the LMR, as well as by public feedback gathered through a public process that began in 2023. As the pace of research and technology development accelerates, and as more data becomes available from the proposed updates to the LMR reporting requirements, CARB may consider a more accelerated schedule for future updates to the LMR.

Progress at landfills to meet SB 1383 requirements

SB 1383¹⁸ requires CARB to implement its Short-Lived Climate Pollutant Reduction Strategy¹⁹ to achieve methane emissions reductions of 40% below 2013 levels by 2030. The 2022 Scoping Plan projected that the State was likely to achieve half of the required reductions without additional action. As the second-largest source of methane emissions in the State, reducing emissions from landfills is critical to achieving the 2030 target. SB 1383 also requires CalRecycle, in consultation with CARB, to adopt regulations to achieve a 75% reduction in statewide organic waste disposal in landfills from 2014 levels by 2025 and to improve rates of edible food recovery for human consumption. Short-Lived Climate Pollutants (SLCP) Regulations to reduce organic waste disposal pursuant to SB 1383 became effective on January 1, 2022.²⁰ The State has made substantial progress towards waste diversion and recycling targets as innovative new programs are implemented to reduce waste generation, recover edible food, expand markets for products made from recovered organics, and direct resources to their highest and best use.^{21,22}

¹⁵ *Investigating Major Sources of Methane Emissions at US Landfills* | *Environmental Science & Technology*

¹⁶ *Summary Report of the 2020, 2021, and 2023 Airborne Methane Plume Mapping Studies* | *California Air Resources Board*

¹⁷ *California State Budget: 2022-2023* (ebudget.ca.gov)

¹⁸ Lara, Chapter 395, Statutes of 2016, codified as Health and Safety code sections 39730.5, 39730.6, 39730.7, and 39730.8; and Public Resources Code Chapter 13.1 (commencing with Section 42652) to Part 3 of Division 30.

¹⁹ *Final Short-Lived Climate Pollutant Reduction Strategy* | *California Air Resources Board*

²⁰ *Short-Lived Climate Pollutants (SLCP): Organic Waste Reductions* (calrecycle.ca.gov)

²¹ *State of Disposal and Recycling in California* (calrecycle.ca.gov)

²² *California's Climate Progress on SB 1383* (calrecycle.ca.gov)

California's 2025 Hazardous Waste Management Plan Approved

DATE: NOVEMBER 17, 2025

WHAT YOU NEED TO KNOW: The Board of Environmental Safety voted today to approve the Department of Toxic Substances Control's 2025 Hazardous Waste Management Plan, bringing California a step closer to modernizing the state's complex hazardous waste management systems.

SACRAMENTO – The Board of Environmental Safety today voted to approve California's Department of Toxic Substances Control's (DTSC) [2025 Hazardous Waste Management Plan](#).

The plan is a comprehensive planning guide to protect California communities from environmental harm through continuous improvement of the state's complex hazardous waste management systems.

“This plan was shaped by public feedback and guidance from the Board of Environmental Safety. The plan identifies opportunities to strengthen hazardous waste management in California while

emphasizing community protection, scientific integrity and sustainability.”

DTSC Director Katherine Butler

While California’s hazardous waste has fallen about 40 percent over the years, today’s report anticipates potential future increases — or changes in types of hazardous waste — and recommends exploring options to manage these waste streams. The Plan includes goals to reduce hazardous waste generation in the first place and divert additional waste from landfilling through recycling and other techniques that promote a circular economy.

Modernization of California’s complex hazardous waste management systems

The plan sets three ambitious goals with practical recommendations, but it does not change laws or regulations.

The goals are rooted in the findings from DTSC’s [2023 Hazardous Waste Management Report](#), robust public engagement and feedback, as well as current scientific data and best practices.

Goal 1: Reduce hazardous waste generation and divert hazardous waste away from incineration or landfilling.

Goal 2: Ensure hazardous waste identification and management standards are scientifically sound, health protective, and environmentally safe.


Goal 3: Use data and resources to promote sustainable and health protective management from cradle to grave.

Future Work

DTSC remains committed to working with communities, Tribal Nations, local governments, and industry and businesses, to ensure hazardous waste is managed safely and responsibly for generations to come.

The department drafts an updated plan every three years to allow for continuous adaptation to changes in societal waste streams, innovations in science and technology, and resources.

More information about the plan is available here: [Hazardous Waste Management Plan | Department of Toxic Substances Control](#).

FOR GENERAL INQUIRIES: Contact the Department of Toxic Substances Control to report illegal handling, discharge, or disposal of hazardous waste, or other environmental concerns using the [CalEPA Environmental Complaint System](#) .

DTSC's Mission is to protect California's people, communities, and environment from toxic substances, to enhance economic vitality by restoring contaminated land, and to compel manufacturers to make safer consumer products.



Monthly Public Meeting

10:00 A.M., November 18, 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

1. Textile Producer Responsibility Organization Applications Due January 1, 2026
Department Staff Contact: Textiles@CalRecycle.ca.gov
[Public Notice](#)
2. Plastic Pollution Prevention Act (SB 54) Implementation Update
Department Staff Contact: Packaging@CalRecycle.ca.gov
3. State of Disposal and Recycling, Imports, and Exports - 2024 Webpages
Department Staff Contact: WasteChar@CalRecycle.ca.gov

Decisions

No items at this time.

C. BEVERAGE CONTAINER RECYCLING PROGRAM

Action Items

No items at this time.

Information Items

1. Enforcement Quarterly Update Q3
Department Staff Contact: Gerald.Blancher@calrecycle.ca.gov
2. Certification & Registration Quarterly Update Q3
Department Staff Contact: Gerald.Blancher@calrecycle.ca.gov

D. 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. Receipt and review of The Drug Takeback Solutions Foundation's Proposed Changes to its Stewardship Plan for Covered Drugs: Reasonable Geographic Spread and Supplemental Service. Action Needed. Public comments accepted through November 14, 2025.

Department Staff Contact: PharmaSharps@CalRecycle.ca.gov

[Public Notice](#)

Decisions Posted

1. Approval of MED-Project's Revised 2024 Annual Report for Covered Drugs. Decision Posted: October 16, 2025.

Department Staff Contact: PharmaSharps@CalRecycle.ca.gov

[Public Notice](#)

2. Approval of MED-Project's Revised 2024 Annual Report for Home-Generated Sharps Waste. Decision Posted: October 16, 2025.

Department Staff Contact: PharmaSharps@CalRecycle.ca.gov

[Public Notice](#)

3. Determination of Compliance for PaintCare's 2024 Annual Report. Decision Posted: October 30, 2025.

Department Staff Contact: Paint@CalRecycle.ca.gov

[Public Notice](#)

E. SOLID WASTE AND TIRE FACILITIES

Action Items

1. Sycamore Landfill, located at 8514 Mast Boulevard, San Diego, CA 92145, City of San Diego, Revised Solid Waste Facilities Permit, Action needed January 05, 2026

Department Staff Contact: Cody.Oquendo@CalRecycle.ca.gov

[Public Notice](#)

2. Chicago Grade Landfill, located at 2290 Homestead Road, Templeton, CA 93465, San Luis Obispo County, Modified Solid Waste Facilities Permit, Action needed November 30, 2025

Department Staff Contact: Cody.Oquendo@CalRecycle.ca.gov

[Public Notice](#)

3. Tulare County Compost Facility, located at 8614 Ave. 328, Visalia, CA 93291, Tulare County, New Compostable Materials Handling Facility Permit, Action needed December 31, 2025

Department Staff Contact: Joy.Bowers@CalRecycle.ca.gov

[Public Notice](#)

4. San Joaquin County, North County Landfill and Recycling Center, located at 17720 E. Harney Lane, Lodi, CA 95240, San Joaquin County, Revised Solid Waste Facilities Permit, Action needed December 7, 2025
Department Staff Contact: Harprit.Mattu@CalRecycle.ca.gov
[Public Notice](#)

Information Item

No items at this time.

F. 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](#).

CalRecycle has a public noticing site to provide interested parties with information about programs, activities, and departmental decisions.

- To review final CalRecycle decisions and other department activities, please go to: CalRecycle.ca.gov/PublicInfo/ or CalRecycle.ca.gov/BevContainer/Notices.
- For public meeting participation, listserv, and feedback information, please go to: CalRecycle.ca.gov/PublicMeeting/

People may speak on any matter concerning CalRecycle with the exception of items related to pending adjudicative (certification or enforcement) proceedings.



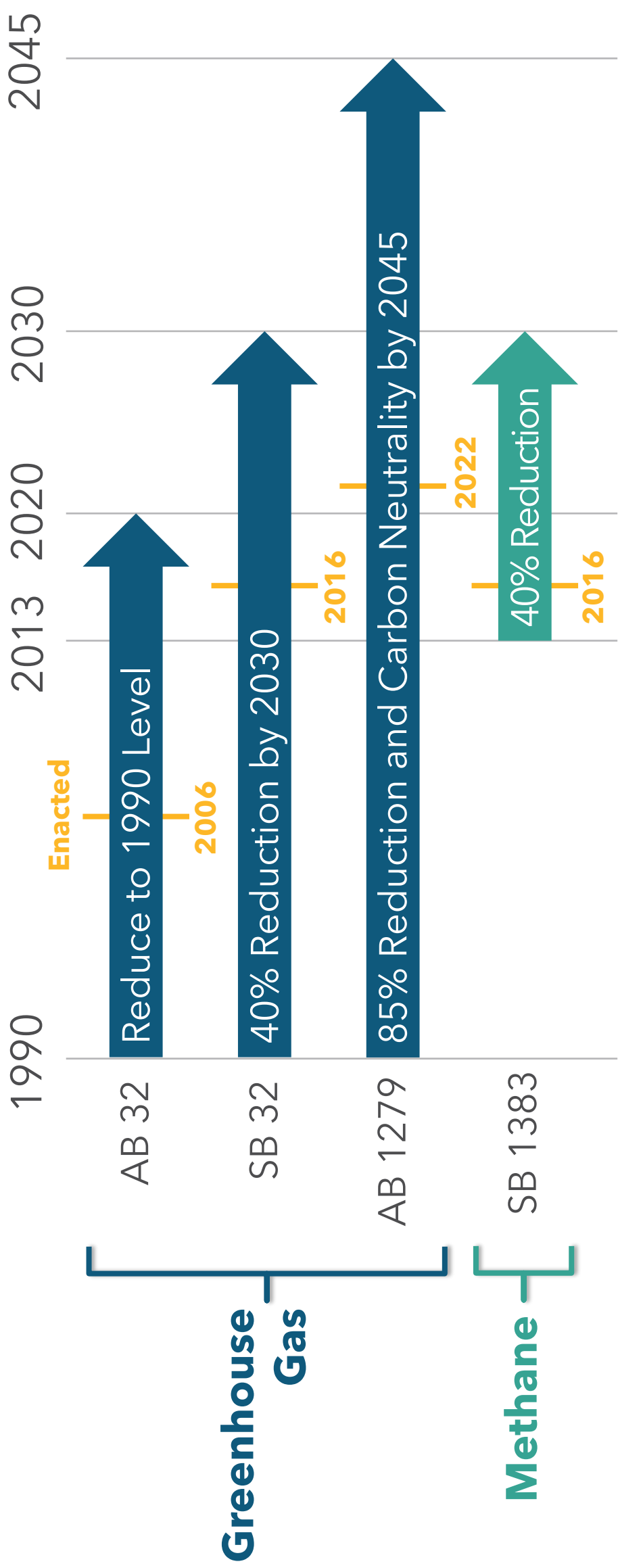
Proposed Amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills

Board Hearing
November 20, 2025

Agenda

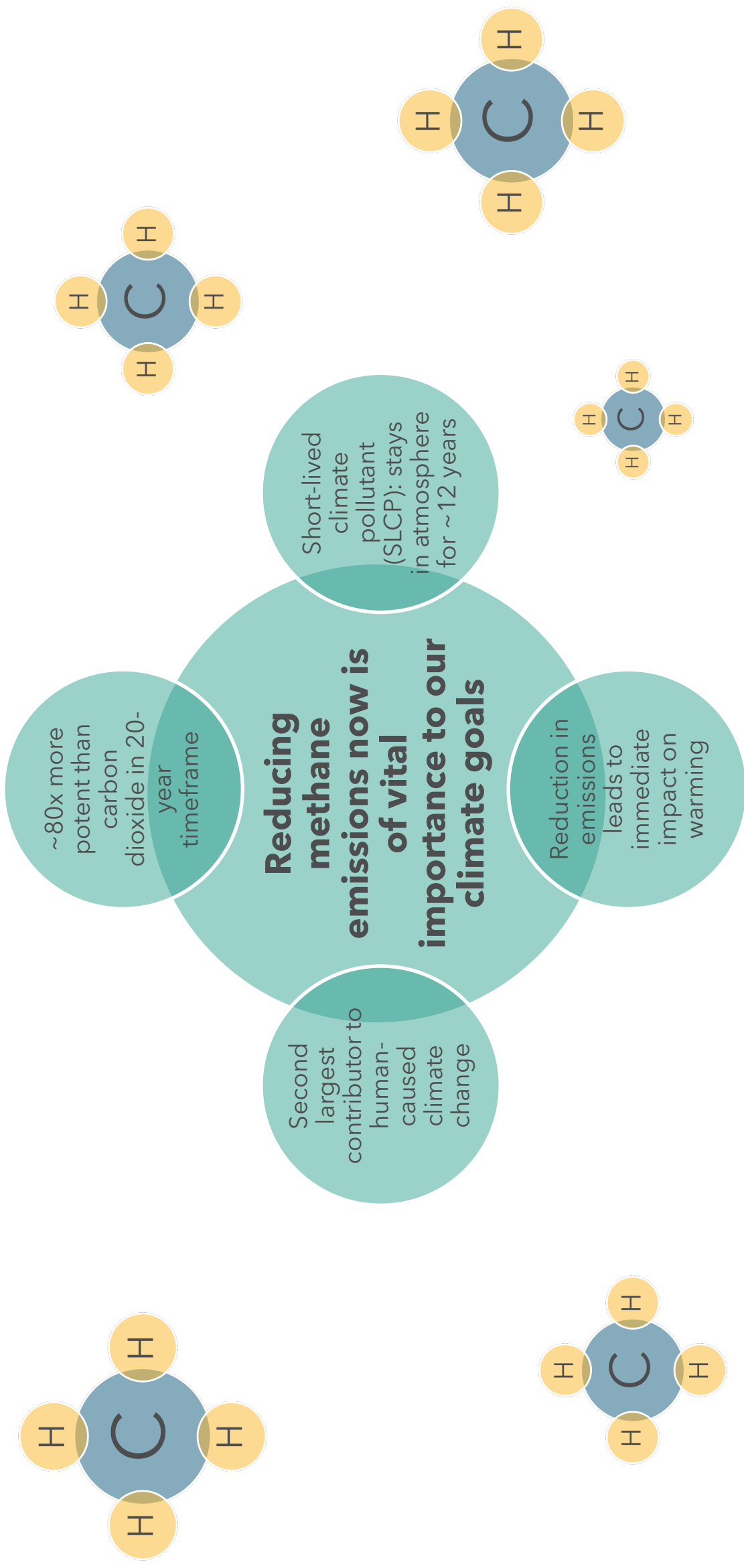
- **Background**
- **Proposed Amendments**
- **Benefits**
- **Next Steps**
- **Staff Recommendation**

California's Climate Targets



Citations: AB 32 (Núñez, 2006); SB 32 (Pavley, 2016); AB 1279 (Muratsuchi, 2022); SB 1383 (Lara, 2016).

Methane (CH₄): A Potent Greenhouse Gas



California's Landfill Regulatory Context

FEDERAL

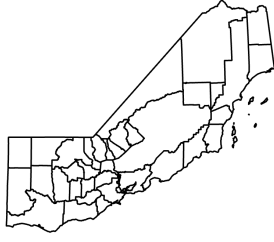


US EPA

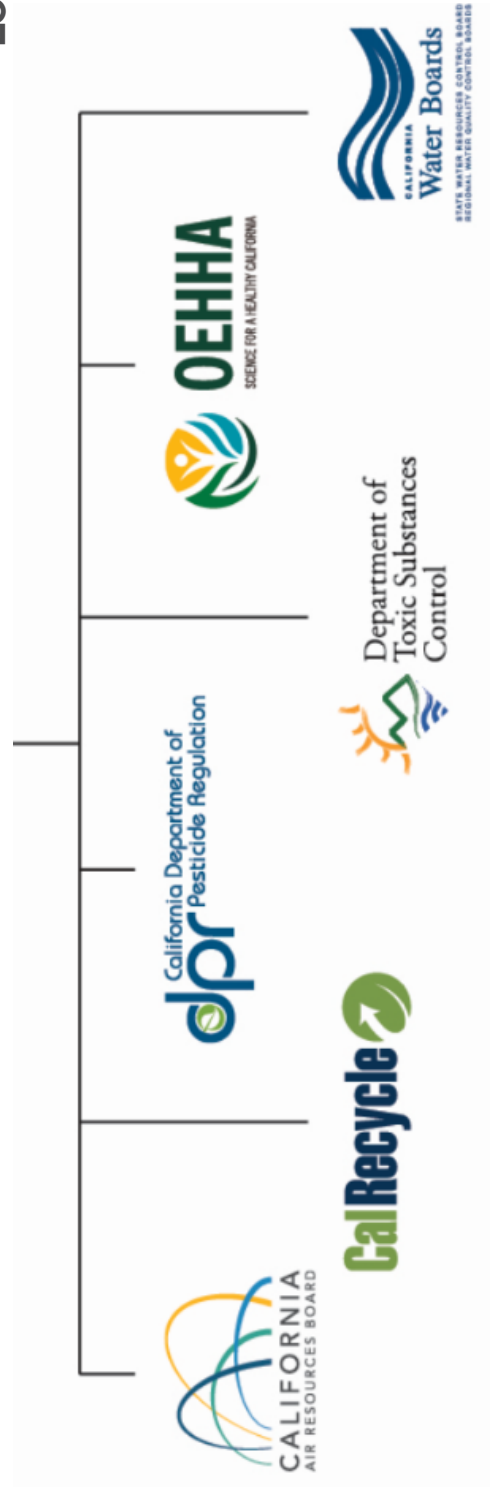
STATE



LOCAL



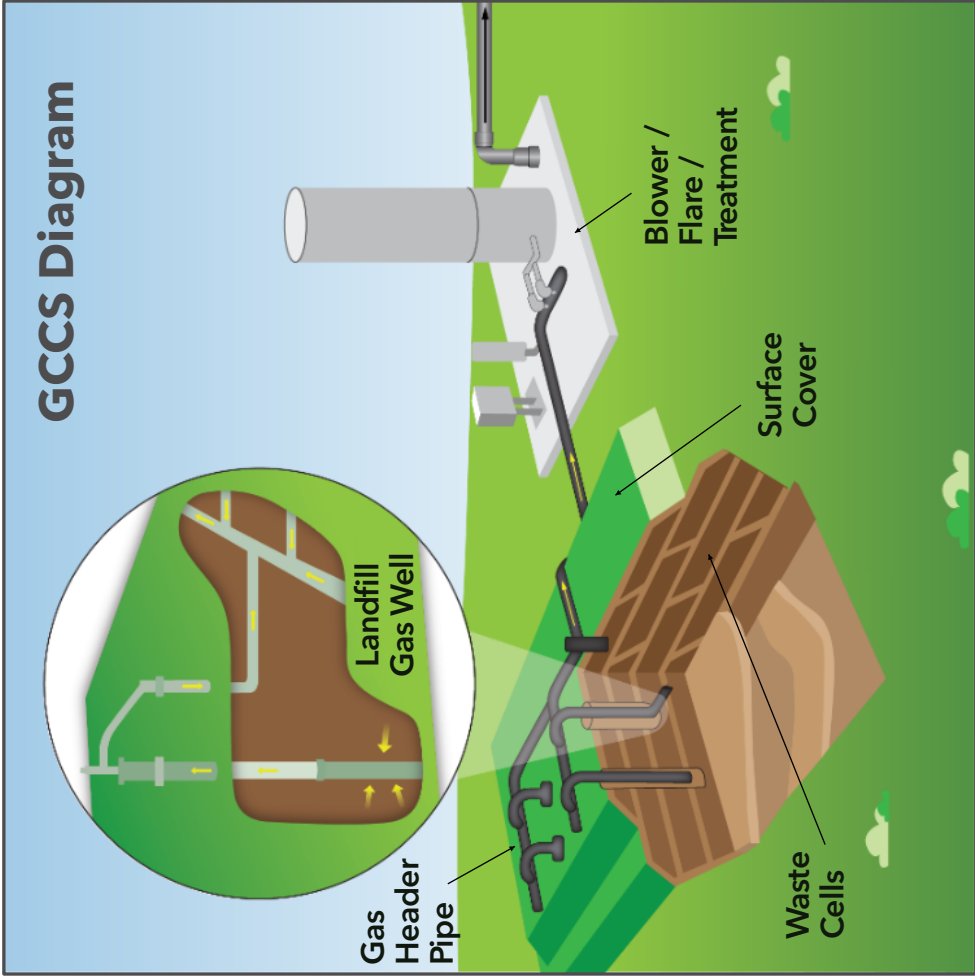
Local Air Districts



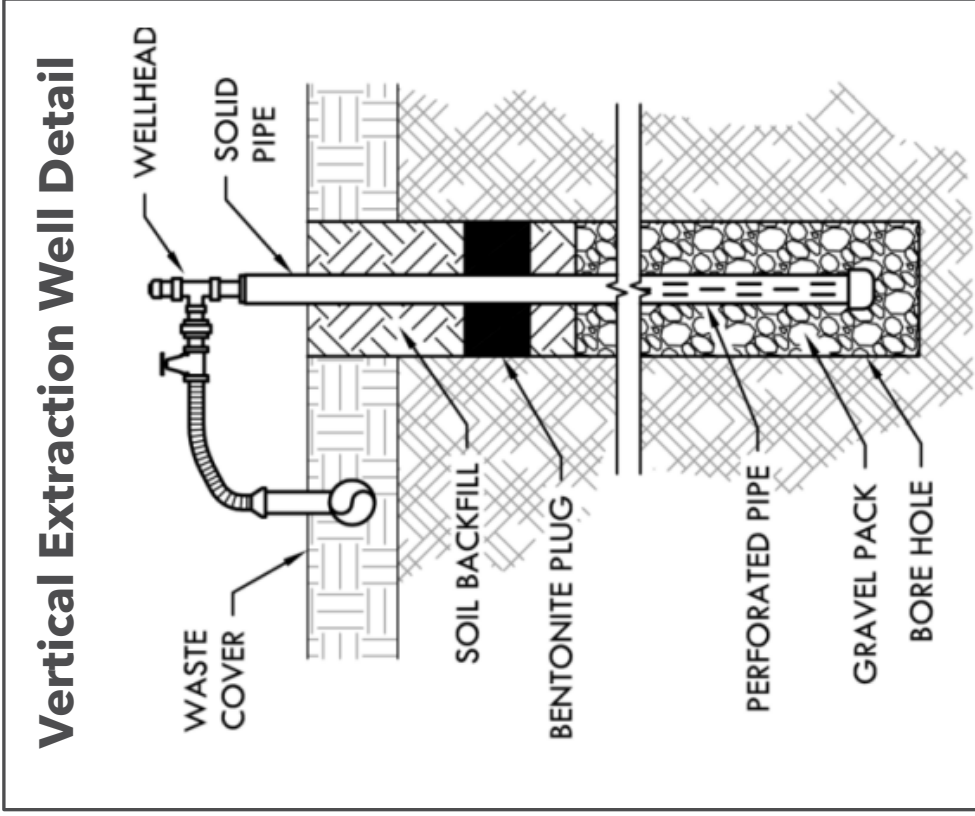
California's Landfill Methane Regulation (LMR)

- Adopted in 2010 as an early action measure under the Global Warming Solutions Act of 2006 (Assembly Bill 32)
- Designed to reduce methane emissions from landfills – also improves air quality and reduces odors
- More stringent requirements for controlling emissions and monitoring for leaks than federal rules
- Most local air districts have agreements with CARB to primarily implement and enforce the LMR in their districts
- Applies to 188 landfills, with 153 required to control emissions

Gas Collection and Control Systems (GCCS)

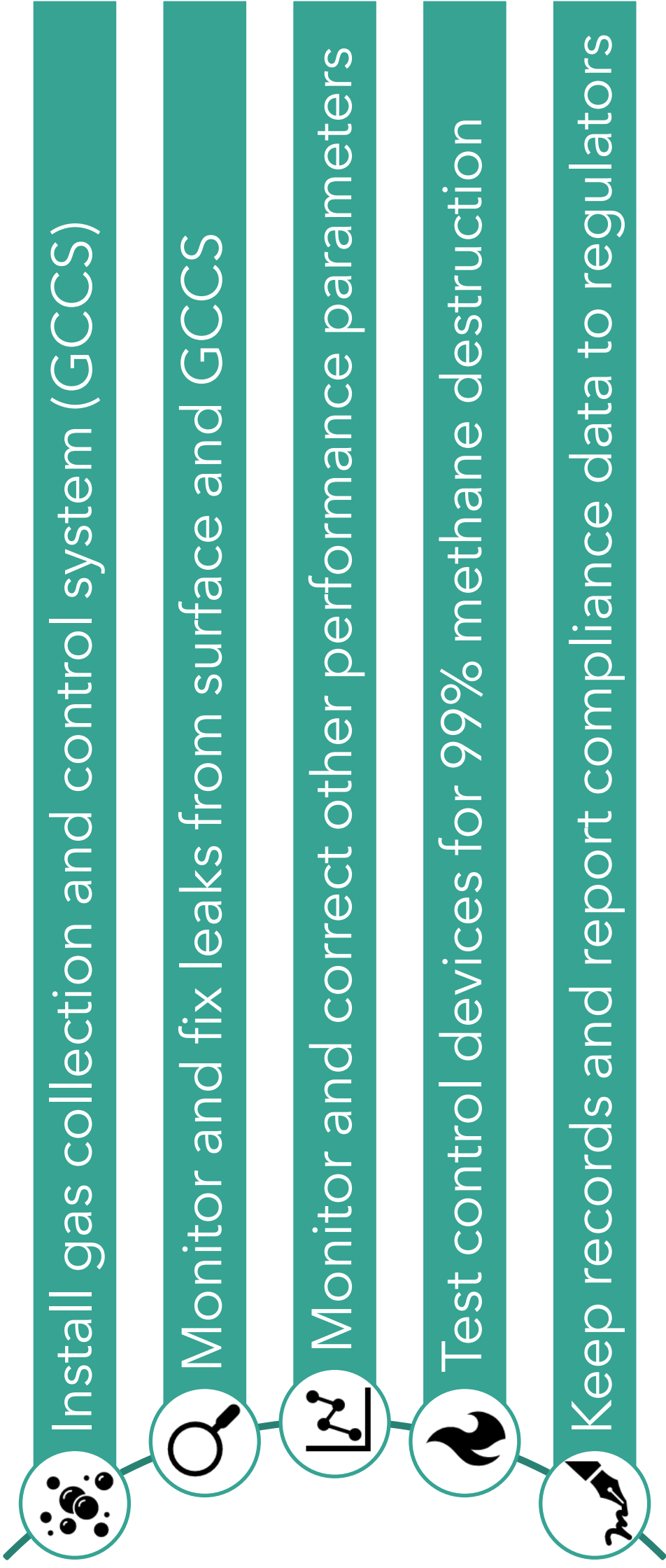


Source: [EPA 2025](#); some labels added



Source: [LMOP 2024](#)

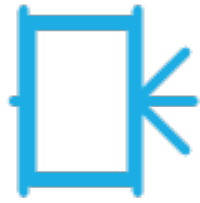
Existing LMR Requirements



Goals and Scope of the Proposed Amendments



Robust Public Process



**Three public
workshops**
2022-2024



**Community
meeting in
Southern CA**
July 2025



**Dozens of
stakeholder
meetings**



**Over 75
comment
letters
received**

- Stakeholder meetings included community-based organizations, community members, environmental advocacy groups, landfill operators, industry groups, technology providers, and academic researchers.
- Focused meetings with state and local regulatory partners.

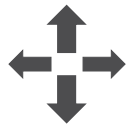
Integrating Remote Plume Detection



Require operator action when notified by CARB | *monitor for leaks on the ground, repair any leaks found, report outcomes*

Additive | *does not replace operator's routine monitoring*

Improving Leak Monitoring



Expand spatial coverage | *limit exemptions and use alternative technologies to monitor areas that are unsafe to walk*



Increase frequency | *conduct monthly monitoring and assess cover integrity and collection system in areas with recurring leaks*



Require faster repairs | *shorten time to initiate and complete repairs*



Ensure repairs are working | *1-month confirmation monitoring*



Evaluate advanced technologies | *drones, lasers, fixed sensors, etc. may be used by operators upon evaluation and approval of procedures by CARB*

Expanding GCCS Monitoring



Monthly wellhead monitoring | *add temperature, gas composition, and flow rate to existing pressure monitoring*



New standards and mitigation measures | *actions including cover improvements to correct exceedances*



Enhanced monitoring and assessments | *to address repeated exceedances and subsurface temperatures above 131 °F*



Trend analysis | *identify and respond to changing conditions*



Semi-annual liquid level monitoring | *detect and remove liquid accumulation blocking gas flow*

Strengthening GCCS Operational Requirements

- ▶▶ **Earlier gas collection** | *in areas of new waste deposition to address working face emissions*
- ⌚ **Limits on GCCS downtime** | *whole system and individual components*
- ⊘ **Limit on the number of wells offline at once** | *to minimize the area without active gas capture*
- └─▶ **Maintain steady system vacuum** | *for consistent gas extraction*

Additional Changes


 **Manage declining gas generation** | *strengthened process for GCCS intermittent operation and shutdown at old, closed landfills*

 **Clarify third-party owner/operator responsibilities** | *to ensure monitoring, testing, and reporting are completed*

 **Enhance reporting** | *more information in a standardized format annually; raw monitoring data quarterly | enables meaningful public data sharing*


 **Additional changes** | *to enhance clarity, adjust processes, improve enforceability, and update data*

Benefits



Reduced Methane Emissions

- Staff conservatively estimated nearly 450,000 MT CO₂e/yr quantified reductions



Reduced Co-Pollutant Emissions

- Reduced odors and improved air quality for landfill workers and communities surrounding landfills



Improved Regulatory Oversight

- CARB and air district access to more compliance data, more quickly



Development of Advanced Technology

- Promotes adoption of latest monitoring technologies
- Potential future cost savings for operators



Benefits Exceed Costs

- \$34M social benefits of methane reduction per year
- \$12M cumulative cost to all facilities per year
 - Most costs borne by larger, active landfills
 - No added costs for uncontrolled landfills
 - Retains cost-saving measures for closed landfills

Selection of the Diverse Comments Received

- Improve public data transparency
- Require emerging technologies for advanced leak detection as they become available
- Support for increased data collection, new standards, shorter repair timelines, and increased reporting frequency
- Add flexibility on repair timelines, reduce monitoring & reporting frequency
- Concerns about additional costs for closed landfills

Proposed 15-Day Changes

- Better align timelines throughout the regulation for simplicity and consistency
- Adjust specifics of some provisions to better recognize unique facility characteristics
- Provide additional flexibility for circumstances outside the operator's control, such as public safety power shutoffs
- Clarifications and adjustments to ensure smooth implementation with our regulatory partners

Expected Outcomes and Staff Recommendation

| | |
|--------------------------------------|---|
| Greater Role for Advanced Technology | Incorporating new and emerging methane leak detection tools |
| Fewer Methane Leaks | Reduced emissions from the working face, expanded coverage and faster repairs |
| Improved Performance | Better monitoring and operational standards to support safe and effective gas collection |
| Stronger Action for Recurring Issues | More frequent monitoring and comprehensive actions to address recurring problems |
| Enhanced Transparency and Oversight | Improved reporting enabling greater transparency and compliance oversight by CARB and air districts |

- **Adopt Resolution 25-14** for approval of the Proposed Amendments

Unified Program Newsletter – October 2025

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CalEPA

2026 CUPA Evaluations

The 2026 CUPA Performance Evaluation pre-notification letters have been sent to the respective CUPAs, and the schedule is as follows:

Certified Unified Program Agency (CUPA) 2026 Evaluation Schedule

| CUPA | Evaluation Begins |
|---|--------------------------|
| City of Hayward Fire Department | January |
| Roseville City Fire Department | February |
| Mendocino County Division of Environmental Health | February |
| Orange County Environmental Health | March |
| City of El Segundo Fire Department Environmental Safety | April |

| CUPA | Evaluation Begins |
|---|--------------------------|
| Colusa County Environmental Health | April |
| Sacramento County Environmental Management Department Environmental Compliance Division | May |
| Solano County Environmental Health | May |
| Merced County Community & Economic Development Department Division of Environmental Health | June |
| Fremont City Fire Department | June |
| Gilroy City Fire Department | June |
| Santa Clara County Environmental Health | July |
| Lassen County Environmental Health | July |
| County of San Luis Obispo Environmental Health Services | August |
| Napa County Planning, Building, and Environmental Services Department Division of Environmental Health - CUPA | August |
| City of Anaheim Fire Department | September |
| County of Los Angeles Fire Department | October |
| Lake County Environmental Health | October |
| City of Union City Environmental Programs Division | November |
| El Dorado County Environmental Management Department | December |

The CalEPA website will be updated soon to reflect the 2026 CUPA Performance Evaluation schedule.

Future CERS NextGen Townhalls

Please join the project team for public townhalls to discuss the project and ask questions.

October CERS NextGen Townhall

Thursday October 30th 10 am -12pm

Sign up at: <https://events.gcc.teams.microsoft.com/event/f30df484-bded-47ca-b623-ad5a235e0037@fedfd738-1216-4730-a902-fd41fa7f4dbc>

November CERS NextGen Townhall

Thursday November 20th 10 am -12pm

Sign up at: <https://events.gcc.teams.microsoft.com/event/8b23c204-1c27-45c7-815b-009f8719f1df@fedfd738-1216-4730-a902-fd41fa7f4dbc>

December CERS NextGen Townhall

Thursday December 18th 10 am -12pm

Sign up at: <https://events.gcc.teams.microsoft.com/event/87a83726-6f0c-41bd-ba86-cbf9889a74e0@fedfd738-1216-4730-a902-fd41fa7f4dbc>

Future NextGen DSC CERS NextGen

Please join the project team (for UPA ONLY) to discuss the project and ask questions. Please e-mail Nick Antilla for a link at Nicholas.Antilla@calepa.ca.gov.

November CERS NextGen DSC

Thursday November 13th 10 am -12pm

You're invited to DSC- ALL CUPA

Thursday, November 13, 2025

10:00 am - 12:00 pm (PST)

https://teams.microsoft.com/l/meetup-join/19%3ameeting_Y2RIZWM2YmEtOWRhZS00YmJmLWI2ZmYtYzEwOGMzZWYwZTFm%40thread.v2/0?context=%7b%22Tid%22%3a%22fedfd738-1216-4730-a902-fd41fa7f4dbc%22%2c%22Oid%22%3a%220f719b86-ca2d-4a53-9056-9450f2f9acaf%22%7d

Tap on the link or paste it in a browser to join.

Please join CalEPA for an All-CUPA CERS NextGen Townhall on November 13th from 10:00 am to 12:00 pm. In the townhall, the project team plans to provide updates on Electronic Data Transfer (EDT) end points, the latest status of Phase 1 progress, and the plan of Phase 2 of the project. CUPAs will be able to ask questions with project team members present.

December CERS NextGen DSC

Thursday December 11th 10 am -12pm

CalARP/HMBP

Guidance for Development of a Dispute Resolution Procedure

CalEPA has published "[Guidance for Unified Program Agencies for the Development of a Dispute Resolution Procedure for the California Accidental Release Prevention Program](#)." This document is intended to provide guidance to UPAs regarding the dispute resolution procedures that are required to be developed and maintained. This document is intended for use as a reference guide for applicable regulations and is not a rule or regulation and does not replace or supersede applicable statutes or regulations. This document serves to outline circumstances and conditions for UPAs to consider while developing or updating their dispute resolutions process. There is also a provided template that may be utilized by UPAs in developing a dispute resolution procedure, which should be customized to reflect the unique circumstances of each UPA.

(<https://calepa.ca.gov/wp-content/uploads/2025/09/Guidance-for-Unified-Program-Agencies-for-the-Development-of-a-Dispute-Resolution-Procedure.pdf>)

For questions regarding this, please contact Elizabeth Brega at

Elizabeth.Brega@calepa.ca.gov.

State Water Board

Single-Walled UST Follow-Up 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 data collected from the follow-up survey has been updated on the [single-walled UST map](https://experience.arcgis.com/experience/0167aef5ced240ddb27331f6988dc8b2) (<https://experience.arcgis.com/experience/0167aef5ced240ddb27331f6988dc8b2>) on the [State Water Board 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). Additionally, the State Water Board began distributing red tag supplies to the UPAs on September 23, 2025, based on the results of the survey.

An overview of the survey results is provided below:

- 393 facilities with 1,083 single-walled components
 - 258 facilities with 691 single-walled tanks only
 - 32 facilities are government owned
 - 45 facilities with 118 double-walled tanks and single-walled piping only
 - 6 facilities are government owned
 - 90 facilities with 274 single-walled tanks and piping
 - 7 facilities are government owned
- 31 facilities with 39 emergency tank systems
 - 12 facilities are government owned
- 42 facilities are within 1,000 feet of a public drinking water well
- 171 (44%) facilities have not submitted a UST closure permit application

For questions regarding single-walled USTs surveys or red tag supplies, contact: Jenna Hartman at (916) 327-8563 or Jenna.Hartman@waterboards.ca.gov.

Enforcement Data in CERS

As the single-walled UST closure deadline approaches, the State Water Board reminds UPAs that all red tag and enforcement information must be entered into the California Environmental Reporting System (CERS). UPAs requiring assistance with entering red tag information in CERS should refer to the [CERS FAQ, How to Enter Red Tag Information](https://www.waterboards.ca.gov/ust/cers/ru01_red_tag.html) (https://www.waterboards.ca.gov/ust/cers/ru01_red_tag.html). Finally, UPAs should report the total number of red tags issued, not the number of facilities with red tags.

For information regarding red tags and enforcement information in CERS, contact: Magnolia Busse at (916) 341-5870 or Magnolia.Busse@waterboards.ca.gov.

Chapter 16 Rewrite Update

On September 3, 2025, the State Water Board adopted the proposed amendments to the UST Regulations. The proposed UST Regulations will become effective on January 1, 2026. A copy of the [proposed UST Regulations](https://www.waterboards.ca.gov/ust/leak_prevention/chapter16/docs/draft-regulations-2026-ust-regulations-for-distribution-no-forms.pdf) (https://www.waterboards.ca.gov/ust/leak_prevention/chapter16/docs/draft-regulations-2026-ust-regulations-for-distribution-no-forms.pdf) is available on the [Chapter 16 webpage](https://www.waterboards.ca.gov/ust/leak_prevention/chapter16/rewrite.html) (https://www.waterboards.ca.gov/ust/leak_prevention/chapter16/rewrite.html) for reference.

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

Chapter 16 Informational Webinars

State Water Board staff will host a series of webinars to provide an overview of the amended UST regulations and respond to questions from attendees. Each session will deliver the same presentation, and UPAs are encouraged to attend the session that best aligns with their availability.

The webinars will be held via Zoom on the following dates and times:

- October 14 from 1:00pm-3:00pm
Join the Meeting at: <https://waterboards.zoom.us/j/84003663799>
- October 16 from 2:00pm to 4:00pm
Join the Meeting at: <https://waterboards.zoom.us/j/82141118960>
- October 21 from 10:00am to 12:00pm
Join the Meeting at: <https://waterboards.zoom.us/j/89923433911>
- November 4 from 10:00am to 12:00pm
Join the Meeting at: <https://waterboards.zoom.us/j/83327571564>
- November 6 from 10:00am to 12:00pm
Join the Meeting at: <https://waterboards.zoom.us/j/86836241436>

For additional information regarding the Chapter 16 Informational Webinars, contact:
Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov.

Jumper Connection Tubes

During oversight inspections, the evaluation staff continue to observe jumpers connected to the interstitial spaces of double-walled flex piping. These connections are utilized during secondary containment testing but must be disconnected once testing is complete to ensure that any leaks are detected at the earliest possible opportunity. If a UPA inspector observes jumpers connected during the annual monitoring certification, a violation must be issued. Evaluation staff will verify that all applicable violations have been issued. For reference, a photo of jumper connections is provided below.



For additional information regarding jumper connection tubes, contact: Michelle Suh at (916) 323-0878 or Michelle.Suh@waterboards.ca.gov.

Report 6 Discrepancies

During the January through June 2025 Report 6 period, the State Water Board identified a significant increase in discrepancies between data reported to CERS and information submitted by the UPAs. Out of 89 UPAs, 40 (45%) required data corrections to facility counts, active petroleum and hazardous substance UST counts, and reported red tags.

Report 6 data is part of a larger deferral reporting requirement to the United States Environmental Protection Agency, where significant corrections in data are closely scrutinized. For paperless Report 6 reporters, submission of Report 6 certifies that the data in CERS has been verified as accurate and complete. UPAs must clearly identify all data discrepancies on the Report 6 form.

For additional information regarding Report 6 or to request Report 6 training, contact: Magnolia Busse at (916) 341-5870 or Magnolia.Busse@waterboards.ca.gov.

For CERS data training, contact Katlin Cottrell at (916) 319-0742 or Kaitlin.Cottrell@waterboards.ca.gov.

UST Enforcement Unit Supervisor

Jenna Hartman will be leaving the UST Leak Prevention Unit after nearly four years. She has accepted the supervisor position with the State Water Board, Office of Enforcement, UST Enforcement Unit. Jenna has been an excellent team member and will be missed. We are very proud of Jenna and excited to see her excel in her new role.

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.

Currently, DTSC is exploring additional ways to extend Tiny Topic Training access to a broader audience, including industry partners and new CUPA staff.

Please contact us if you have a good suggestion or venue ideas to DTSC_CUPATrainers@dtsc.ca.gov.

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 was delivered across the state in the past year. DTSC would continue to make the effort to offer this popular training annually.

Upcoming Training Schedule:

- **Fresno** – November 19, 2025 - Now accepting registrations (**Only six (6) seats left**). The registration form is located at the following link:

https://forms.office.com/Pages/ResponsePage.aspx?id=9P+PP2DhKky6uMY-9L0kOUOI8FqzDJKtQuXPjc_pyNUREFNTE84Vk1NWkZZUFk3RkU1Uk1W0EFFFsi4u

Date: Wednesday, November 19, 2025

Time: 9:00 AM to 4:00 PM

Location: Woodward Park Regional Library
944 E. Perrin Avenue
Fresno, California 93720

Training Details:

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.

Upcoming Virtual Training: Conducting Effective Hazardous Waste Generator Inspections

DTSC is pleased to announce an upcoming virtual training developed in collaboration with the Stanislaus Department of Environmental Resources:

Training Details:

Date: Wednesday, November 12, 2025

Time: 9:30 a.m. – 2:30 p.m.

Location: Zoom virtual meeting

Registration Link:

<https://dtsc-ca-gov.zoom.us/meeting/register/R1XoHrxtRtq80u8YgdJEEw>

This training will provide inspectors and regulatory staff with the knowledge and tools to:

- Navigate and research regulatory databases (CERS, EnviroStor, HWTS, RCRAInfo, ECHO).
- Conduct thorough pre-inspection preparation.
- Perform effective field inspections.
- Identify the most common hazardous waste violations.
- Apply interviewing, photography, note-taking, and evidence collection techniques to support defensible enforcement cases.

How to register?

Register in advance for this meeting:

<https://dtsc-ca-gov.zoom.us/meeting/register/R1XoHrxtRtq80u8YgdJEEw>

After registering, you will receive a confirmation email containing information about joining the meeting.

For questions or additional information, please contact the CUPA Training and Assistance Unit at DTSC_CUPATrainers@dtsc.ca.gov.

DTSC's 2026 Electronic Verification Questionnaire and Late Reporting Penalties

DTSC's 2026 electronic Verification Questionnaire (eVQ) report cycle is set to begin on January 30, 2026. The Verification Questionnaire must be completed in the eVQ System and is due **by March 31** of each year. Failure to submit the eVQ by the deadline constitutes a violation. Starting with this reporting cycle, each handler will be assessed a separate violation for each ID number that does not comply with this requirement (Cal. Code Regs., tit. 22, §66269.32). The initial penalty will be determined based on the annual tonnage generated in the previous calendar year and the number of days the report is delinquent. If you receive questions from stakeholders regarding the questionnaire, please refer them to the following information:

eVQ System: <https://evq.dtsc.ca.gov>

eVQ Penalty Information: <https://dtsc.ca.gov/evq-penalties/>

Email: eVQ@dtsc.ca.gov

Toll-free Number: 1-877-454-4012, Monday to Friday from 9 a.m. – 2 p.m. Pacific Time

Hazardous Waste Tracking System and RCRAInfo System User Account Cleanup

Security best practices and standards require that user accounts be removed or disabled within a specified timeframe. Stale accounts pose a significant security risk, as they provide opportunities for bad actors to gain unauthorized access to sensitive data and resources within the system.

If you are a manager or supervisor, please email hwtsadm@dtsc.ca.gov to request a list of active HWTS and RCRAInfo regulatory user accounts from your organization. Review this list to identify any employees who are either no longer with your agency or no longer require access. This will allow DTSC to deactivate those user accounts.

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 is available on website at <https://osfm.fire.ca.gov/committees/aboveground-petroleum-storage-act-apsa-advisory-committee>.

APSA Webinars

Another APSA webinar is coming soon. This next series will be held on November 4 and 5, 2025.

Use the link below to join the webinar on November 4 at 10:00-11:00 AM:

[Join the November 4 webinar via Microsoft Teams](#)

([https://teams.microsoft.com/l/meetup-](https://teams.microsoft.com/l/meetup-join/19%3ameeting_NTdlMzg5ZmYtNzA4Zi00YmY1LWJiYmUtYWQzYmM2ZDk2MDZl%40thead.v2/0?context=%7b%22Tid%22%3a%22447a4ca0-5405-454d-ad68-c98a520261f8%22%2c%22Oid%22%3a%2255dd5151-2626-4f47-82ff-87b7f7bc788f%22%7d)

[join/19%3ameeting_NTdlMzg5ZmYtNzA4Zi00YmY1LWJiYmUtYWQzYmM2ZDk2MDZl%40thead.v2/0?context=%7b%22Tid%22%3a%22447a4ca0-5405-454d-ad68-c98a520261f8%22%2c%22Oid%22%3a%2255dd5151-2626-4f47-82ff-87b7f7bc788f%22%7d](https://teams.microsoft.com/l/meetup-join/19%3ameeting_NTdlMzg5ZmYtNzA4Zi00YmY1LWJiYmUtYWQzYmM2ZDk2MDZl%40thead.v2/0?context=%7b%22Tid%22%3a%22447a4ca0-5405-454d-ad68-c98a520261f8%22%2c%22Oid%22%3a%2255dd5151-2626-4f47-82ff-87b7f7bc788f%22%7d))

Meeting ID: 286 688 037 626
Passcode: uc34xP
Dial in by phone: +1 (650) 564-3271
Phone conference ID: 296 876 322#

Use the link below to join the webinar on November 5 at 2:00-3:00 PM:

[Join the November 5 webinar via Microsoft Teams](https://teams.microsoft.com/l/meetup-join/19%3ameeting_NGI5MTk2ODQtNzU3Mi00ZTE4LTkyYWQtMGEyYmU3MDFjZTg3%40thead.v2/0?context=%7b%22Tid%22%3a%22447a4ca0-5405-454d-ad68-c98a520261f8%22%2c%22Oid%22%3a%2255dd5151-2626-4f47-82ff-87b7f7bc788f%22%7d)

(https://teams.microsoft.com/l/meetup-join/19%3ameeting_NGI5MTk2ODQtNzU3Mi00ZTE4LTkyYWQtMGEyYmU3MDFjZTg3%40thead.v2/0?context=%7b%22Tid%22%3a%22447a4ca0-5405-454d-ad68-c98a520261f8%22%2c%22Oid%22%3a%2255dd5151-2626-4f47-82ff-87b7f7bc788f%22%7d)

Meeting ID: 236 463 452 316 1
Passcode: x4ty9BG3
Dian in by phone: +1 (650) 564-3271
Phone conference ID: 152 943 76#

If unable to attend the APSA webinar on November 4 or 5, you may request a copy of the presentation by sending an email to cupa@fire.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](#)

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CalEPA

CalARP Training

In the beginning of October, CalEPA conducted training for three CUPAs that were in need of beginner/intermediate level training in the CalARP program. The training provided was very successful and interactive, the in-person aspect provided a space to answer questions, clear any misconceptions about the program and engage directly with the CUPAs. Following the training, CalEPA attended a CalARP inspection lead by the local CUPA. During this inspection CalEPA was able to provide education, make observations and answer questions directly from the CUPA's and the stationary source operators. This was done by completing a site walk through and documentation review, both on and offsite. The training and inspection created positive collaboration between CalEPA, the CUPA's and industry. CalEPA is excited to continue to conduct more trainings for CUPA's in the future.

Updates to IIAR Requirements

CalEPA would like to remind CUPAs of the American National Standards Institute-International Institute of All-Natural Refrigeration (ANSI-IIAR) 9 requirements that come into effect Jan 1, 2026, for CUPA's who have program 2 and 3 ammonia refrigeration

stationary sources in their jurisdiction. Stationary source owners/operators should be aware of these requirement updates. To learn more visit: <https://www.iicar.org/>.

If you have any questions please reach out to Alexa Kostrikin, alexa.kostrikin@calepa.ca.gov.

State Water Board

Storage of Gasoline Containing 15 Percent Ethanol

The State Water Resources Control Board (State Water Board) sent a [notice](#) to the underground storage tank (UST) community (<https://www.waterboards.ca.gov/ust/docs/2025/ust-e15-letter.pdf>) that effective October 2, 2025, Health and Safety Code has been amended to allow the sale of gasoline blends containing up to 15 percent ethanol by volume (E15) in California (Stats. 2025, ch. 247 ([Assembly Bill 30](#) (<https://legiscan.com/CA/text/AB30/id/3191091>)).) This gasoline blend will be made available alongside existing ethanol gasoline blends and must comply with all other applicable UST requirements.

Owners or operators of USTs planning to store E15 must demonstrate compatibility with E15 in accordance with Title 23, chapter 16 (UST Regulations) and submit compatibility documentation 30 days prior to changing the fuel to E15. Approximately 5,000 USTs in California are not compatible with fuels containing more than 10 percent ethanol (E10). A number of UST components, including older (pre-2000) flex piping, line leak detectors, and turbines may not be incompatible with alcohol concentrations above E10. Any component for which compatibility cannot be demonstrated must be replaced with a compatible component before storing a new substance.

For questions regarding E15 gasoline or compatibility, please contact: Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.

Chapter 16 Rewrite Update

The Office of Administrative Law completed their review of the Chapter 16 rulemaking package and filed their approval with the Secretary of State on October 28, 2025. The amended regulations become effective on January 1, 2026.

For your convenience, a courtesy copy of Chapter 16, including the new downloadable forms, is available on the [Chapter 16 website](#) (https://www.waterboards.ca.gov/ust/leak_prevention/chapter16/rewrite.html) under [Adopted Regulations](#) (https://www.waterboards.ca.gov/ust/leak_prevention/chapter16/docs/ccr23-chapter-16-2026.pdf).

For additional information regarding the Chapter 16 rulemaking, contact: Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov

Sampling Requirements for UST Closure

Some Unified Program Agencies (UPAs) are requiring sample analyses that are incorrect or incomplete when issuing UST closure permits. As a result, the Regional Water Quality Control Boards must request additional samples from owners and operators of closed UST systems, often after new USTs have been installed.

UPAs must contact the appropriate Cleanup Oversight Agency prior to sampling to ensure that all constituents, based on tank contents, are included in the analysis. As part of the Chapter 16 modification effective January 1, 2026, the regulations specifically require that sampling be conducted in accordance with the Cleanup Oversight Agency's requirements. If sampling requirements are included as part of the closure permit, they must align with those specified by the Cleanup Oversight Agency and Chapter 16.

Additionally, the sampling requirements for UST closures have changed effective January 1, 2026. Samples must be collected a minimum of two feet into native soil, immediately beneath:

- Each end of the tank
- The midpoint of each tank with a capacity greater than 12,000 gallons
- Each internal bulkhead of compartmented tanks
- All hazardous substance piping at 20 linear-foot intervals, with additional samples collected at each change in direction for rigid piping; and
- Each dispenser

For questions regarding UST closure sampling, please contact:

Dayna Cordano at (916) 341-5385 or, Dayna.Cordano@Waterboards.ca.gov.

GeoTracker UST Closure/Unauthorized Release Reporting Module

In preparation of the new reporting requirement for UST closures in UST Regulations, State Water Board staff have developed a new reporting module within the GeoTracker system. This feature is now available on the [GeoTracker website](https://geotracker.waterboards.ca.gov/ust_tank_tool) (https://geotracker.waterboards.ca.gov/ust_tank_tool). UPA staff are encouraged to become familiar with the program by voluntarily submitting permanent UST closures and reportable unauthorized releases through this module until the end of 2025. Beginning January 1, 2026, with the implementation of the amended UST Regulations, all UPAs will be required to submit this information through the GeoTracker reporting module.

For questions regarding this new reporting module, please contact: GeoTracker Help Desk at geotracker@waterboards.ca.gov.

Modifications to the Local Guidance Website

With the changes to the UST Regulations and the permanent closure of all single-walled USTs, many existing guidance documents are now outdated. State Water Board staff are currently updating the Local Guidance (LG) website. This includes removing obsolete LG letters, updating or drafting new LG letters, and reorganizing certain LG letters. Some well-known LG letters, such as LG 113 and LG 105, will no longer appear as

LG letters but will instead be posted under separate [webpages](#) titled *Release Detection Equipment and Methods for Underground Storage Tanks* and *Licensed Tank Testers and Tank Testing Companies*

(https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.waterboards.ca.gov%2Fwater_issues%2Fprograms%2Fust%2Fleak_prevention%2Figs%2Fdocs%2F105-10.xlsx&wdOrigin=BROWSELINK), respectively.

LG 200 – Report 6 and Technical Compliance Rate

Formerly LG 164, the Report 6 and [Technical Compliance Rate](#) (https://www.waterboards.ca.gov/ust/leak_prevention/lgs/docs/lg200.pdf) guidance document was updated to clarify reporting requirements of the Semi-Annual Underground Storage Tank Program Report (Report 6). The update removes the airport hydrant system reporting requirement and provides additional clarification on the reissuance of Technical Compliance Rate (TCR) violations and the timeframe for reporting red tags.

For questions regarding LG 200, or Report 6, please contact:
Magnolia Busse at (916) 341-5870 or Magnolia.Busse@waterboards.ca.gov.

LG 201 – Acceptable Local Ordinances for the Underground Storage Tank Program

The State Water Board has posted [LG 201](#) - *Acceptable Local Ordinances for the Underground Storage Tank Program* (https://www.waterboards.ca.gov/ust/leak_prevention/lgs/docs/lg201.pdf). This letter clarifies local ordinance requirements and outlines the process for formal Board approval of any UST design and construction standards that go beyond those required in Health and Safety Code, chapter 6.7 (H&SC 6.7) and UST Regulations.

The State Water Board recommends that all UPAs review their current local ordinances to ensure alignment with H&SC 6.7 and UST Regulations. UPAs must immediately stop implementing any inconsistent local ordinances or additional design and construction standards and begin the process of rescinding their local ordinances. Evaluation staff will review all local ordinances as part of the UPA evaluation process.

For questions regarding LG 201 or local ordinances, please contact:
Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.

Office of Tank Tester Licensing Webpage

The Office of Tank Tester Licensing (OTTL) has updated *List of State Water Board License Tank Testers* (formerly LG 105) on the [OTTL website](#) (https://www.waterboards.ca.gov/ust/tank_testers/) to reflect the current list of State Water Board licensed tank testers. The website also provides access to OTTL Regulations, OTTL testing notification forms, and a link to the *Release Detection Equipment and Methods for Underground Storage Tanks* (formerly LG 113) website. In addition, licensing information for applicants and study materials for the exam are available.

For additional information regarding the OTTL website updates, contact: Kaitlin Cottrell at (916) 319-0742 or Kaitlin.Cottrell@waterboards.ca.gov.

Facility Compliance Inspection Reporting

UST Regulations section 2713(d) requires UPAs to report to the State Water Board, by January 31 each year, the number of UST facilities where a compliance inspection was not conducted during the previous calendar year. Beginning January 1, 2026, this requirement will be located in section 2692(b) of the amended UST Regulations. The State Water Board must also report annually to the United States Environmental Protection Agency on several performance measures under the Energy Policy Act of 2005 (EPAAct), including certification that all UST facilities comply with the federal inspection frequency requirement.

The State Water Board recommends that UPAs use the [UST Routine Inspection Frequency](#)

(<https://cersregulator2.calepa.ca.gov/Account/SignIn?ReturnUrl=%2fReports%2fUSTRoutineInspectionFrequencySearch>) search tool in the California Environmental Reporting System (CERS) to verify the accuracy of UST facility compliance inspections. On October 17, 2025, the State Water Board provided a [letter](#) (<https://www.waterboards.ca.gov/ust/docs/ust-compliance-inspection.pdf>) to UPA Managers that included instructions for utilizing the search tool. UPAs should use this tool in advance to identify facilities where a compliance inspection has not been performed during the 2025 calendar year and to verify that accurate data has been reported to CERS. This report will assist UPAs in identifying missing inspections or inaccurate data. UPAs should run the CERS UST Routine Inspection Frequency search now and again in mid-December.

For information regarding compliance inspection reporting requirements, contact: Magnolia Busse at (916) 341-5870 or Magnolia.Busse@waterboards.ca.gov.

Public Records Information Webpage

In addition to the UST compliance inspection reporting, the EPAAct requires states to provide an annual summary that is available to the public. This summary must include the number of current UST facilities, UST systems, inspections performed, and information on unauthorized releases. On November 1, 2025, the State Water Board published the [Public Records Summary Information](#) of Underground Storage Tanks web page (https://www.waterboards.ca.gov/ust/leak_prevention/public_record_sum_info.html). The summary covers the reporting period from July 1, 2024, through June 30, 2025, and includes the percentage of UST systems in compliance with the TCR performance measures.

For information regarding the public records web page, contact: Magnolia Busse at (916) 341-5870 or Magnolia.Busse@waterboards.ca.gov.

Red Tag Data

The State Water Board has updated the red tag application data and significant violations by type on the [Red Tag Requirements and Guidance webpage](#)

(https://www.waterboards.ca.gov/ust/enforcement/red_tag_regs_index.html), using information provided from the January through June 2025 Report 6. Between July 1, 2024, to June 30, 2025, 34 UPAs applied red tags to 239 USTs.

For additional information on red tag application data, contact:
Magnolia Busse at (916) 341-5870 or Magnolia.Busse@waterboards.ca.gov.

Cal FIRE OSFM

Thinking About Power Washing Your Aboveground Storage Tank?

Power washing to clean aboveground storage tanks (AST) can be done, but it must be done carefully. For more information on this topic, visit the Steel Tank Institute (STI) – Steel Plate Fabricators Association (SPFA) website at <https://stispfa.org/resource/is-it-safe-to-power-wash-an-aboveground-storage-tank/>.

Emergency Generators

Question: Are emergency generators exempt or excluded under the Aboveground Petroleum Storage Act (APSA)?

Answer: There is no exemption or exclusion if the generator has the capacity to store **55 gallons or more of petroleum**.

Question: What about a generator that stores less than 55 gallons of petroleum and is in a basement?

Answer: This is considered a ‘tiny’ tank in an underground area (TIUGA). Although tiny TIUGAs are not required to be included in a Spill Prevention, Control, and Countermeasure (SPCC) Plan, APSA requires tiny TIUGAs to have secondary containment, be inspected monthly, and the owner or operator maintains the inspection records.

For more information on TIUGAs, refer to OSFM website at <https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act/tank-in-an-underground-area-tiuga>.

For more information on APSA, visit the OSFM website at <https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act>.

For more information on the Federal SPCC rule, visit the U.S. Environmental Protection Agency website at <https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations>. The SPCC Guidance for Regional Inspectors is available at <https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/spcc-guidance-regional-inspectors>.

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

California's environmental board approved hazardous waste plan that critics say could weaken protections



A Waste Management landfill outside Kettleman City, Calif., is one of two sites statewide that are permitted to accept hazardous waste. (Reed Saxon / Associated Press)



Dec. 2, 2025 3 AM PT

- California’s environmental board voted 4-1 to approve the state’s first hazardous waste management plan despite environmental advocates’ concerns about potential deregulation.
- Environmental groups fear the plan could weaken protections by encouraging the state to review federal exemptions for hazardous materials recycling and potentially redefining what counts as hazardous.
- The board pledged closer oversight of controversial provisions and committed to reassessing contentious recommendations before revisions in 2028.

A California environmental oversight board approved a state plan outlining strategies to safely reduce hazardous waste — despite sharp criticism from environmental groups who say several aspects of the plan could invite deregulation.

A [2021 state law](#) directed the California Department of Toxic Substances Control (DTSC) to publish a plan every three years, outlining the state’s approach to minimize the generation, disposal and incineration of hazardous waste. In March, the state agency released a draft of the first-ever hazardous waste management plan, drawing opposition for [a controversial recommendation](#) to consider allowing more contaminated soil to be dumped at nonhazardous landfills.

Eight months later, after four public meetings, a revised plan was discussed during a hearing in mid-November at the CalEPA headquarters in Sacramento. Many environmentalists remained wary, noting the plan still recommends reviewing federal exemptions for hazardous materials that can be recycled and a broader reassessment

of California’s standards. Their fear is that this could lead the state to roll back its protocols — widely considered among the most strict in the country.

“We find this plan to be extremely deregulatory and paving a path for DTSC to adopt more loopholes for industry,” said Andrea Loera, an attorney with San Francisco-based nonprofit Earthjustice.

“Excluding hazardous waste from the law,” she continued, “does not make hazardous waste dangers magically disappear.”



CLIMATE & ENVIRONMENT

Some California landfills are on fire and leaking methane. Newly proposed rules could make them safer

Nov. 19, 2025

The Board of Environmental Safety, a five-member committee tasked with supervising DTSC, voted 4-1 to approve the plan. Board members said they recognized the unease around parts of the plan but vowed to closely track these proposals to ensure any changes did not result in harmful deregulation.

“I’ve heard serious concerns that evaluations called for ... will necessarily lead to outcomes that are less protective for public health,” said Andrew Rakestraw, the board’s chair. “And ... we, as a board, our mandate is to ensure that does not come to pass.”

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Board member Ingrid Brostrom echoed those sentiments, ultimately voting in favor of the plan.

“What I fear is, if we basically allow DTSC to move forward without the plan, we have simply removed our oversight,” said Brostrom. “The question for me is, is having this plan better than having no plan at all? For me, the answer is no.”

The plan suggests the state should evaluate the federal government’s exemptions and exclusions for recyclable streams of hazardous waste.

Because of California’s more stringent hazardous waste regulations, much more potentially dangerous waste needs to go to a specialized landfill or treatment facility than would be required by the federal government’s rules.

However, the state only has two hazardous waste landfills, and disposal there is significantly more expensive.

There is a loophole, which has also caused an uproar among environmental advocates: Oftentimes, industry and government agencies opt to export California hazardous waste waste to municipal landfills in neighboring states that rely on the less-restrictive federal rules.

The federal program also waives fees and requirements for “legitimate” recycling of certain hazardous wastes, such as scrap metal. Environmentalists said they worry this would put more communities at risk, noting the largest environmental cleanup in California’s history is of [lead-contaminated homes](#) near a [former battery recycling plant](#) in Southeast Los Angeles County.

“It is not the time for us to stand on par with the federal government which is trying to dismantle hazardous waste protections,” said Ivana Castellanos, an organizer with Physicians for Social Responsibility.

The state’s new plan set out to address these dilemmas by identifying ways to minimize hazardous waste at the source and explore ways to recycle emerging sources of hazardous waste, such as lithium-ion batteries.

But many environmental organizations say the plan doesn’t provide the state with a proper road map, leaving out specific targets or dates for reducing hazardous waste.

At the Nov. 17 meeting, the board said it would consider requiring DTSC to set hazardous waste reduction and diversion goals for the next iteration of the plan, which is due in 2028.

Environmentalists also say the plan appears to try to reduce hazardous waste by redefining what counts as hazardous.

The plan suggests the state should review the federal government’s exemptions and exclusions for recyclable streams of hazardous waste, such as reclaimed scrap metal.

A handful of recommendations in the plan call for the evaluation of the effectiveness of a state test that simulates how toxic substances may leak out of contaminated solid waste in landfill conditions; how exposure to certain California-regulated metals corresponds with health effects; and the state’s benchmarks for lead-containing waste.

DTSC officials said these evaluations were required under the 2021 law that established the state hazardous waste management plan. At the hearing, DTSC director Katie Butler pushed back on accusations that the plan was a deregulatory scheme, stressing its overarching goal is to safeguard Californians.

“The intention is to protect health, safety, the environment — and that is the lens in which we look at this entire plan,” Butler said at the meeting.

In addition to approving the state plan, board members voted to discuss ways oversee these “contentious” recommendations in [public meetings](#) to be held Jan. 14-15 in Sacramento.

More to Read

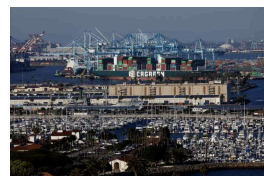
California regulators approve rules to curb methane leaks and prevent fires at landfills

Nov. 20, 2025



L.A. air officials approve port pollution pact as skeptics warn of ‘no clear accountability’

Nov. 8, 2025



Down to the wire: California lawmakers announce last-minute climate and energy package

Sept. 11, 2025





Tony Briscoe

Tony Briscoe is an environmental reporter with the Los Angeles Times. His coverage focuses on the intersection of air quality and environmental health. Prior to joining The Times, Briscoe was an investigative reporter for ProPublica in Chicago and an environmental beat reporter at the Chicago Tribune.

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ENVIRONMENT

Why a small change in paperwork is generating a big fight over hazardous waste in California



BY ALEJANDRA REYES-VELARDE
OCTOBER 30, 2025

[Republish](#)



An aerial view of the UC Berkeley campus in Berkeley on Nov. 28, 2022. Photo by Jane Tyska, East Bay Times via Getty Images

IN SUMMARY

The University of California system says lifting tracking requirements will make managing hazardous waste more efficient. Hundreds of other waste handlers will benefit too, but the state hasn't identified them.

Just as consumers can track a package from a warehouse to their doorstep, California regulators keep tabs on the movement of hazardous waste, even on a short journey.

Now the Department of Toxic Substances Control is considering whether to lift some of those tracking requirements in situations where companies transport hazardous waste within their own properties and along some public roads.

The University of California system and large corporations say this change in what's called the manifest rule would make hazardous waste disposal processes safer and more efficient. It could benefit car manufacturer Tesla, giant agribusiness in the San Joaquin Valley or industrial chemical manufacturers in the Los Angeles Basin.

But environmental advocates say [state regulators](#) have no good reason to weaken California's regulations, which are more stringent than federal rules. They fear the department's proposal signals regulators' intent to weaken regulations as a strategy to manage some of the state's growing waste problem.

"Certainly you don't have to assume that everybody's a bad actor, but you probably also shouldn't assume that nobody's a bad actor," said Angela Johnson Meszaros an attorney for the environmental group Earthjustice.

Where does the waste go?

To track hazardous waste, businesses make detailed reports, including what toxic materials are in what containers, where the waste is coming from and where it's going. This manifest protects generators of hazardous waste, helping them prove that they followed regulations. If there's an accident on the road, the records help fire departments and other responders keep the public safe.

According to the Department of Toxic Substances Control, the rule change would apply to about 235 hazardous waste producers. That includes the University of California system, which produces waste at every campus, in hospitals, in maintenance operations, and in research.

At UCLA, if researchers have slides with chemicals on them, or vials that were used in experiments, that toxic waste is stored in the labs until it can be collected.

What happens next is expensive and inefficient, said Ken Smith, who directs environmental health and safety systemwide for the University of California.

Every time waste moves from collection sites to disposal sites off campus, someone has to write a manifest. Large trucks come to labs to pick up the hazardous trash, no matter how small the load.

“Imagine if you had to send a big dump truck just to pick up your individual waste container from your kitchen or bathroom. They’re going to charge you a trip every time,” Smith said.

Since 1997, California’s manifest rule has demanded more information from more waste generators than the federal system. That’s when a federal rule change exempted other waste generators including the military from having to make detailed reports when waste is transported onsite.

In [announcing a proposal](#) to adopt federal exemptions for waste that travels within a businesses’ property, state regulators wrote that the change would “increase overall public and environmental safety” because with fewer records to make, large, registered-transporter trucks like those for the UC system could collect waste at fewer central locations.

“California has the most protective, rigorous requirements for hazardous waste management in the nation,” said department spokesperson Alysa Pakkidis, in an email. “The manifest exemption continues our state’s high standards and does not alter transporters’ obligations.”

Advocates seek answers

If the Department of Toxic Substances Control changes the manifest rule, it’s not just the UC system that benefits: according to regulators’ announcement, “miscellaneous chemical businesses,” military and other government businesses would qualify for the proposed exemption.

But the department is sharing little information about exactly which facilities will stop reporting some information or how many miles hazardous waste may travel without being tracked.



California Toxics: Out of state, out of mind

JANUARY 25, 2023

At the only public hearing on the rule change so far, regulators gave no presentation. Pakkidis said the department does not have a list of qualifying facilities and hazardous waste generators have no obligation to notify the department if they take advantage of the new rule.

“DTSC regularly inspects hazardous waste transporters and generator facilities to ensure they follow all the rules, including manifesting when required,” she said.

Without details, community advocates and skeptics for the rule say they’re left to speculate.

Smith, the UC official, said chemical waste from a research lab at UCLA may travel miles along the perimeter of campus where homes and schools are located. If the rule applies at large agricultural farms too, said Johnson Meszaros, the Earthjustice attorney, hazardous waste might be transported multiple miles from one side of property to the other.

“Just because it’s not going far doesn’t mean that it’s not vulnerable to an accident,” Johnson Meszaros said.

Tesla and Pacific Gas & Electric Company say the exemption would benefit them.

In a letter to state regulators, Tesla wrote that the proposal to lessen manifest requirements “is critical to provide operational flexibility when handling hazardous waste.”

A spokesperson for PG&E said that the change would allow the utility to minimize truck traffic and centralize waste storage areas “oftentimes to a location that is better suited for the surrounding community.”

“This exemption is really setting everybody up for a lot of confusion and therefore a lot of noncompliance,” said Rebecca Overmyer-Velázquez, an advocate with the Clean Air Coalition for North Whittier and Avocado Heights, at the August public hearing. “We’re entering into this period of just confusion and lawlessness, where anyone can decide that they’re not going to have to manifest the waste that they’re transporting.”

Members of her coalition have raised questions about whether changing the manifest rule would change operations at Ecobat, the only lead-acid battery recycling facility in California. Regulators have been considering an update to Ecobat's permit, which was expected in July this year after some delays.

A spokesman for Ecobat says the rule does not apply at its City of Industry facility. The DTSC has not clarified whether Ecobat is one of the 235 facilities that would benefit from a changed manifest rule.

California's toxic trash problem

The Department of Toxic Substances Control characterizes the manifest proposal as a "clarification." But advocates fear it's a harbinger of weakening hazardous waste laws, one potential strategy to deal with California's toxic trash problem.

In the last 25 years, the amount of hazardous waste generated in the state has [decreased by more than 40%](#), even though the number of hazardous waste generators has doubled, according to the department. But the waste stream is changing, and the state lacks the capacity to handle certain kinds of waste; specifically, lithium-ion batteries that are critical to clean energy plans.

A 2021 state law, recognizing that problem and its complexity, directed the Department of Toxic Substances Control to reform how it manages hazardous waste.

Just two landfills can accept the state's most toxic trash; [a CalMatters investigation in 2023](#) found that, even two years ago, nearly half of it is [driven to states that have weaker environmental protections](#). DTSC estimates the landfills will reach capacity by 2039.

In March, DTSC recommended weakening hazardous waste disposal rules for contaminated soil, one of the state's largest streams of toxic waste. The department removed the recommendation after the Board of Environmental Safety – recently created to oversee the department – raised concerns.

The latest draft of the state's hazardous waste plan has three goals: to reduce the amount of waste that is burned or goes to landfills, to manage waste in a way that protects peoples' health and the environment, and to use data "from cradle to grave" to help manage the state's hazardous waste sustainably.

Johnson Meszaros said she thinks these recommendations leave room for weakening regulations, including those that protect people from exposure to contaminated soils.

DTSC, for instance, is planning to review other federal exemptions that the state could adopt and evaluate how harmful waste is, when it's considered hazardous under California law but not federally.

“There’s nothing in this revised version that suggests that DTSC has stepped away from their deregulatory approach, and in fact, they continue to speak directly to a desire to do that,” said Johnson Meszaros.

[READ NEXT](#)



California exports the risk from its hazardous waste. One neighborhood in Mexico shows the consequences

DECEMBER 20, 2023



Toxic trash: California’s aging hazardous waste sites have troubling safety records

AUGUST 22, 2023

Oakland's trash collector sues city for breach of contract

A simmering legal squabble escalated on Halloween after Oakland and Waste Management hit a big snag during contract negotiations



by **Eli Wolfe**

Nov. 6, 2025, 3:00 p.m.



Waste Management and California Waste Solutions bins outside a home in East Oakland. Credit: Florence Middleton for The Oaklandside.

As Oakland celebrated Halloween last Friday, the city received an unpleasant treat: a lawsuit from its garbage collector.

Waste Management of Alameda County is [suing](#) Oakland in Alameda County Superior Court over a complex contractual dispute with millions at stake.

Oakland has used Waste Management to collect trash for many years. In 2015, the city inked a deal with the company to collect and process trash and compost from residences and businesses. The City Council [selected](#) a different firm, California Waste Solutions, to handle recycling.

In the lawsuit filed Friday, Waste Management claims Oakland has breached the agreement by unfairly penalizing the company for failing to meet waste disposal targets and by refusing to negotiate contract modifications in good faith.

According to the lawsuit, Oakland officials wrongfully tried to assess nearly \$24 million in “liquidated damages” against the company. Waste Management also accused the city of applying lower rates on the company, failing to implement a “special assessment program” to collect money from customers who aren’t paying for trash service, and generally failing to address illegal dumping.

It’s unclear how the lawsuit might affect Oakland residents and businesses. Officials from Waste Management and the Oakland City Attorney’s Office did not immediately respond to interview requests. The city has not yet filed a response to the lawsuit.

These allegations aren’t actually new: Waste Management first brought legal claims against the city in 2020 to address these issues. But the parties wanted to negotiate an extension and modifications of Waste Management’s contract, so they agreed to set aside their differences while trying to find a compromise. The city agreed to toll, or hit pause, on the statute of limitations for Waste Management’s legal claims. This meant that Waste Management wouldn’t lose the right to file a lawsuit in court if the talks went south.

Closed-door negotiations about the contract have been going on since June, which Waste Management characterized as “productive” in the new court filing. But the company wrote that Oakland recently refused to continue tolling the deadline for Waste Management to file its complaint. The company doesn’t say why in its filing.

“As such, although WMAC still desires to reach a negotiated resolution with the City, it has been forced to institute this action to preserve its claims,” the complaint stated.

Waste Management accuses Oakland of imposing unfair penalties

As part of Oakland’s 10-year agreement with Waste Management, the city wanted to achieve its “Zero Waste” goal, which aimed to divert as much as 75% of solid waste away from landfills and into recycling and composting. To do this, Waste Management agreed to build a plant to process solid waste. The city also demanded that Waste Management enter into a subcontract with East Bay Municipal Utility District, or EBMUD, which would construct its own facility for processing commercial organic materials. Waste Management objected to this subcontract but went ahead with it, according to the complaint.

EBMUD failed to build the facility, which forced Waste Management to look elsewhere. Some facilities said they were unable to help, citing the “highly contaminated nature of the materials” and high processing costs. The city also shot down one of the firms that Waste Management was prepared to work with.

As a result of these delays, Waste Management said it missed its targets for diverting waste from landfills. Instead of taking into account the disruption caused by EBMUD, the city penalized Waste Management by trying to impose nearly \$24 million in “liquidated damages” for failing to deliver organic scraps to city-approved facilities, and for failing to collect all mixed materials from Oakland households. Waste Management argued that these penalties are not authorized in their agreement and also unfair, given the unanticipated delays and costs.

According to the company, its contract gives it the right to renegotiate terms with Oakland in the event of a big external change. But Oakland officials refused to adjust the contract to compensate Waste Management “for the massive cost” caused by EBMUD’s exit. Waste Management also suffered financial losses during the COVID-19 pandemic, including “drastically reduced” commercial business during shutdowns, and expenses on special COVID-19 pay and protective equipment for workers.

Oakland’s alleged failure to address illegal dumping is also cited as an issue in the lawsuit. Waste Management claims Oakland “refuses to enforce existing ordinances or to enact additional ordinances to abate illegal dumping” or to “hold private and public property owners accountable for failing to secure and safeguard their property,” which results in more dumping.

CALIFORNIA

Trash fees will spike for many L.A. residents in aftermath of city's fiscal crisis



A man walks by after throwing away trash on April 7, 2024, in Los Angeles. (Michael Blackshire/Los Angeles Times)



By Julia Wick

Staff Writer | [X Follow](#)

Oct. 7, 2025 **Updated** 2:22 PM PT

- The Los Angeles City Council voted Tuesday to dramatically increase trash collection fees to \$55.95 a month per unit.

- This is the first trash fee hike in 17 years — a necessity for a cash-strapped city that had been heavily subsidizing waste collection. But the hefty increases will add to residents' financial burden in an increasingly unaffordable city.

Many Los Angeles residents will soon be paying significantly more for trash collection after the City Council [voted Tuesday](#) to finalize a dramatic fee increase.

The trash program had become heavily subsidized, to the tune of about \$500,000 a day, which officials said was no longer viable given the city's dire financial straits, which left them scrambling to close a nearly \$1-billion budget deficit earlier this year.

Having the cost subsidized by the city for so long contributed to that deficit, according to City Administrative Officer Matt Szabo.

"It should have been corrected a long time ago," Szabo said. "If we didn't get this rate increase, the subsidy would have been more than \$200 million this year."

The city hadn't raised trash pickup fees in 17 years, and a [2016 state law](#) governing organic waste disposal significantly increased operational costs. Large raises for city sanitation workers and rising equipment costs also bumped up expenditures.

Once the new fees go into effect, probably in mid-November, residents of single-family homes or apartments with four units or less will pay \$55.95 a month per unit.

That sum is more than double the \$24.33 a month that occupants of triplexes and fourplexes had been paying, and a roughly 50% increase on the \$36.32 previously paid by residents of single-family homes and duplexes.

Those customers put their waste in black bins for regular trash, blue bins for recycling and green bins for organic waste, which are emptied by city workers once a week. Larger

apartment buildings will be unaffected by the changes, because their waste collection is administered through a separate program.



CALIFORNIA

Huge trash fee hike looms for L.A. residents

April 10, 2025

The fees will increase by an additional \$10 over the next four years.

By next year, the increased fees will reflect the actual cost of trash pickup and will be on par with or slightly below [what residents pay in nearby cities](#) such as Long Beach, Pasadena, Culver City and Glendale.

Still, the new fees will almost certainly engender sticker shock for L.A. residents already contending with skyrocketing insurance premiums, rising rents and eye-popping grocery prices. Rates will be reduced for low-income customers who qualify for the city's [EZ-SAVE](#) or [Lifeline](#) programs.

The City Council approved the increase on a 12-2 vote, with Councilmembers Monica Rodriguez and Adrin Nazarian dissenting.

Last week, the council also voted to [raise the prices and hours](#) of city parking meters.

“After approving a [\\$2.6-billion Convention Center expansion](#), the council is asking residents to pay more for basic services like trash collection while delivering less. That doesn't reflect the priorities of working Angelenos,” Rodriguez said after Tuesday's vote. “I can't, in good conscience, support that approach.”

A number of factors catalyzed the city's financial issues, which exploded into public view during the budget process earlier this year. Los Angeles had taken in weaker than

expected tax revenues, paid out more in [legal liabilities](#) and adopted large-scale raises for city employees.

When Mayor Karen Bass first presented her budget in the spring, layoffs for more than 1,600 city workers were on the table. She and the City Council were [ultimately able to avoid those cuts](#) through a number of cost-saving measures.

Tuesday's final vote on the trash fees came nearly six months after the council [gave preliminary approval to the plan](#).



CALIFORNIA

Parking will soon cost more in Los Angeles. Here's what you need to know

Oct. 7, 2025

The matter was complicated by [Proposition 218](#), a 1996 statewide ballot measure designed to make it harder for local governments to raise taxes and fees. To satisfy the proposition's requirements, the city had to hold public hearings and give every affected resident the opportunity to weigh in via a notice mailed to their homes before the increase could move forward.

The fee hike legislation still has to be signed by the mayor and formally published by the city clerk. The fee can't go into effect until 31 days after that, or mid-November at the earliest.

The city budget, however, was calculated under the assumption that the new fees would go into effect Oct. 1. The delay will leave the city on the hook for an extra \$500,000 a day.

Because Tuesday's vote was not unanimous, the ordinance will receive a second reading next week before the council formally approves it and sends it to the mayor — a

technicality that will cost the city \$3.5 million. The mayor plans to sign it as soon as she receives it, her office said.

The delay to mid-November will cost the city a total of at least \$22 million, creating another deficit that will have to be adjusted for down the line.

Still, some residents decried the ballooning fees, with one calling the increase “preposterous.”

“Listen to our cries,” the person, who did not give their name, said [in a written public comment](#). “We can barely keep a roof over our heads — at this time! Los Angeles is falling apart. It is your job to fix it more practically.”

The Historic Highland Park Neighborhood Council also opposed the rate hike, arguing that residents are already facing steep cost-of-living increases and that layering more fees on top of that would be “neither fair nor sustainable.”

The last time the city increased trash fees, [back in the summer of 2008](#), City Controller Kenneth Mejia was a few months out of high school, George W. Bush was in the Oval Office and Katy Perry’s “I Kissed a Girl” was topping the Billboard charts.

Amid a global economic downturn, the city was [facing widespread cuts](#), and leaders looked — as they often do — to the price tag of city services to try to balance the budget.

Times staff writers David Zahniser and Dakota Smith contributed to this report.

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Julia Wick

Julia Wick is a former reporter at the Los Angeles Times. She and her colleagues won the 2023 Pulitzer Prize in breaking news for reporting on a leaked audio recording that upended Los Angeles politics. She was also part of the team that was a 2022 Pulitzer Prize finalist for work covering a fatal shooting on the set of the film “Rust.” Before joining The Times, Wick was the editor in chief of LAist.

British Columbia

Despite 10-year Metro Vancouver ban on organics in the garbage, it's still the top landfill item

22 per cent of regional waste is green waste that can be composted, says Metro Vancouver

[Chad Pawson](#) · CBC News · Posted: Aug 27, 2025 5:00 AM PDT | Last Updated: August 27



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Solid waste is dropped off at a Metro Vancouver facility in Coquitlam in August 2025. Twenty-two per cent of waste arriving here, on average, is compostable organics, which were banned by Metro Vancouver in 2015. (Martin Diotte/CBC News)

[comments](#)

For 10 years, organic waste has been banned from Metro Vancouver landfills, but the materials—things like food scraps which can be composted — are still the most common single item ending up there.

It's a waste conundrum for the region, which prides itself on resident and business know-how in reducing waste and keeping materials from ending up in landfills.

"When organics end up in the garbage and they can end up in the landfill, they produce methane, which is a powerful greenhouse gas," said Terry Fulton, Metro Vancouver's senior project engineer.

Conversely, if organics are properly diverted, it's a straightforward process to turn them into a soil amendment.

"Which is a valuable product that actually helps build healthy soils."



Compost bins are pictured at Cedarwood Place in Richmond, B.C., on Aug. 26, 2025. (Ethan Cairns/CBC)

Since 1997, Metro Vancouver has been [banning items from its solid waste facilities](#) that are "readily recyclable," with food scraps added in 2015.

Fulton said many people and businesses do the right thing by having compost bins and systems in place to have the materials diverted and composted, but the latest Metro Vancouver waste composition shows that [22 per cent of regional waste was compostable organics](#), the most common single item, ahead of plastic, which comprises 19 per cent of regional waste.

In 2024, an average of 70 kilograms of compostable organic materials per person ended up in the garbage.

That's down from the 87 kilograms per capita of compostable organics in the garbage in 2021, when they made up 28 per cent of regional waste.

Officials like Fulton are commending residents and businesses for their efforts to slowly reduce the amount of organic waste showing up in landfills.

"But there's still work to be done," said Fulton. "We see some sectors where there's more challenges than others."

One of the biggest areas for improvement is multi-family buildings. A separate waste composition study in 2024 by Metro Vancouver showed that [32 per cent of waste coming from the buildings was compostable organics](#).

Smaller spaces, smell, and ickiness are all reasons why residents in these buildings have a higher rate of organic waste in their garbage compared to the regional average.

Cristy Houston, the City of Richmond's waste reduction and recycling co-ordinator, says a big part of her job is providing tools and information to residents in multi-family buildings to divert more organic waste.

"I think of a lack of convenience ... the distance between where you may be sorting your materials and where they're actually ending up within your building can contribute to why it might be easier to do things incorrectly," she said.

"But the opportunity to sort and create that space within your multifamily building to make sure you're sorting things is something that's readily available to all residents."



Cristy Houston, the City of Richmond's waste reduction and recycling co-ordinator, says the city provides tools such as recycling bins and bags along with information to try to help reduce the amount of organic materials ending up in the landfill. (Ethan Cairns/CBC News)

There are buildings overcoming these hurdles and doing a great job, according to both Houston and Fulton.

One is Cedarwood Place in Richmond, which is a 72-unit complex that houses seniors. It has multiple recycling and compost bins outside in a central location with clear signage showing what is accepted or not.

Resident Maria Bianchi said people at the complex make an effort to make sure their green materials don't end up in the garbage, even if it's not a perfect system.

"Yes, except I do think the green bin stinks a hell of a lot," she said.

Penalties and incentives

Metro Vancouver has been running a "[food scraps aren't garbage](#)" campaign for years in hopes of pushing people to do the right thing.

A surcharge of 50 per cent of the tipping fee is applied to haulers who bring loads containing 25 per cent of visible organics to solid waste facilities in Metro Vancouver.

- [How to feng shui your fridge — and why it might help to curb climate change](#)

That, along with the public campaign, has brought improvements in diversion rates, but after 10 years of an organics ban, it's unclear how much further it will improve or by how much it should.

The current diversion rate in Metro Vancouver for all waste is 65 per cent, with a goal to hit 80 per cent, said Fulton. That could change, however, as Metro Vancouver is currently [updating its solid waste management plan and seeking public input](#).

Jiaying Zhao, with UBC's Centre of Psychology and Sustainability, studies behaviours around waste reduction and recycling and has worked with Metro Vancouver on its organics problem.

She lives in a multi-family building and freezes her compost and then takes it down to her building's waste room once it's full to avoid any unsavouriness.

- [Here's why food waste is a major climate change issue](#)
- [Messaging, visual cues can reduce the use of plastic produce bags, says study from UBC prof](#)

She says Metro Vancouver could be more direct about the major consequence of not diverting green waste, namely that the methane it produces is far more potent to the atmosphere than carbon dioxide.

"So you want to outline the consequences of not composting food waste, but at the same time you also want to highlight any incentives, any benefits of composting, like if you compost your food ... this turns into soil and that grows our food."

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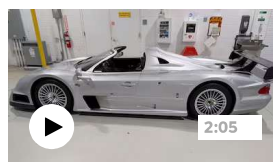
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What Shasta's new \$10M composting plant means for food waste recycling



David Benda

Redding Record Searchlight

Updated Dec. 3, 2025, 7:51 a.m. PT

Key Points AI-assisted summary ⓘ

Residents in Anderson and Shasta Lake will begin curbside food waste recycling in early 2026 to comply with state law.

Food scraps should be placed directly into green bins, as plastic or compostable bags are not accepted.

Waste Management's new Organics Composting Facility in Anderson means curbside pickup of food scraps is expanding in the North State.

[Redding residents have been disposing of food waste](#) in green bins since January 2024.

Curbside pickup of food waste for residents who live in unincorporated Shasta County started in October.

Soon, people living in Anderson and Shasta Lake will be asked to comply with the state law (California Senate Bill 1383) that is designed to reduce food waste.

Curbside food waste collection for residential and commercial customers in Anderson starts Jan. 5, 2026, according to Waste Management spokeswoman Daiane Cezario.

In Shasta Lake, the service is tentatively scheduled to start in February 2026, Cezario said.

Waste Management provides garbage service to the unincorporated areas of the county, and to the cities of Anderson and Shasta Lake.

Making the food waste expansion possible is Waste Management's new multi-million-dollar composting plant on Cambridge Road in Anderson. The Anderson Chamber of Commerce will celebrate its opening with a ceremony on Wednesday, Dec. 3.

The facility, built with the help of a \$10 million CalRecycle Organics Grant, will process yard waste and food scraps from across Shasta County and convert it into nutrient-rich compost, Cezario said.

Waste Management calls the plant the first large-scale commercial composting site in the region. It will be able to process approximately 40,000 tons of green waste and food scraps a year.

The plant opened on Oct. 5, 2025.

Disposing of food waste do's and don'ts

"The most important guideline for diverting food waste is to avoid placing organic items in plastic bags," Cezario said.

Even BPI-certified compostable bags are not acceptable in unincorporated Shasta County and won't be in Anderson and Shasta Lake, she said.

"That's because it really improves the quality of the final composting material," Cezario said. "Compostable bags don't necessarily compost at the same rate of real organic materials, so that final compost material will be a higher quality" without the bags.

Where to throw that food waste

In Anderson and Shasta Lake, only commercial customers will receive a new green organics cart.

Cezario said residential customers in those cities can use their current yard-waste cart to dispose of food waste.

“Shasta County residents also received new carts because they did not have existing green waste containers,” she said.

Acceptable food scraps

All types of food scraps, food-soiled paper, paper towels, napkins, tea bags, coffee filters and greasy pizza boxes are acceptable.

“To prevent contamination, customers should never place pet waste, diapers, or hazardous materials in the organics cart,” Cezario said.

David Benda covers [business](#), development and anything else that comes up for the USA TODAY Network in Redding. He also writes the weekly "[Buzz on the Street](#)" column. He's part of a team of dedicated reporters that investigate wrongdoing, cover breaking news and tell other stories about your community. Reach him on Twitter [@DavidBenda_RS](#) or by phone at 1-530-338-8323. To support and sustain this work, please [subscribe](#) today.