

## 2020 Recology Contamination Reduction Plan for the City of Shoreline

## **Introduction:**

The goal of this plan is to reduce the contamination in Commercial and Multifamily Customers' Recyclables Containers to a level of no greater than five percent (5%) by volume of collected Recyclables. During this period, no on-site audits will be conducted in Commercial and Multifamily Customers' Compost Containers. The draft plan below is in addition to the promotion and education activities in the current contract.

This plan refers to two types of processes to evaluate contamination levels in recycle containers specifically for Commercial and Multifamily customers:

- Route-Level Pad Inspections: Truck contents are emptied onto the floor of Recology's Material Recovery Facility and a Recology representative will visually inspect load contents to document types and levels of recycling contamination.
- On-Site Customer Audits: A Recology outreach representative will conduct an on-site visual audit of customer carts/containers by lifting the cart/container lid and visually assessing the top layer of contents to document types and levels of recycling contamination.

## **Recycling Contamination Reduction Program Outline**

- 1. Customer Notification of Contamination Monitoring Protocol and Enforcement Procedure:
  - Customers will receive a letter clearly outlining the contamination reduction program 90 days before program implementation
    - o Letter will highlight:
      - o Upcoming 'Where Does It Go' Workshop at The Recology Store
      - o Acceptable materials in the recycling cart
      - o Potential contamination fee
      - Offer educational resources such as but not limited to: a presentation, waste audit, signage, stickers, trainings
- 2. Ongoing Monthly Route-Level Pad Inspections Procedure:
  - Recology will conduct monthly pad inspections of each Commercial and Multifamily route at Recology's Material Recovery Facility in Seattle. All pad inspections will be based on collection day/route and each route will be inspected at least once per month.
  - Pad inspections will be conducted by Material Recovery Facility staff to determine if recycling contamination in the load by volume is five percent or more (5+%). This process includes:
    - o A commercial recycling truck arriving at the Material Recovery Facility
    - o Load of recycling is dumped in a designated area to conduct pad inspection
    - o Pad inspection is conducted by Recology staff
    - o If contamination is not present (less than 5%):
      - o Recology staff will document that the route did not exceed contamination levels in digital formal with photos



- Report is shared with Waste Zero Coordinator (outreach staff) to track acceptable routes/collection days
- o *If contamination is present (5% or more contaminated material by volume):* 
  - o Recology staff will document the contaminants and information in digital format with photos
  - o Report is shared with Waste Zero Coordinator (outreach staff) to track contamination levels month-to-month
  - Waste Zero Coordinator will create priority list of routes to target for on-site audits based on monthly contamination percent by route/collection day
    - a. Prioritization process will identify which route/collection day will receive on-site visual audits
      - i. The higher the contamination level for a route, the higher the placement of that route on the priority list
      - ii. Each week a new route will be selected from the priority list based on the previous month's pad inspections to target the first on-site visual audit as described below.
        - 1. If a route is consistently the most contaminated route for subsequent months, Recology will move through priority list selecting a new route each week. Once all routes have gone through the first on-site audit (approximately two or three months). Recology will start process below.
      - iii. For the second and subsequent on-site visual audit: Each month a new route will be selected from the priority list based on previous month's pad inspections to target on-site visual audits as described below
        - 1. If a route is consistently the most contaminated route for subsequent months, Recology will move through the priority list selecting a new route each month. Once all routes have gone through on-site audit process highlighted below, Recology will restart the process in iii (approximately six-months).
- 3. Weekly On-Site Visual Recycling Audits Procedure:
  - Based on route prioritization described above, Recology will conduct targeted on-site visual recycling audits at each site along the selected route to determine if contamination by volume is above five percent (5%).
  - On-site visual audits consist of a Waste Zero Coordinator lifting the recycle cart/container lid and visually assessing the contents in the top layer. This process includes:
    - o 1st On-Site Visual Audit
      - o *If contamination is not present (less than 5%)*: Customer is serviced by collection truck as recycling. Customer will continue to receive on-site visual audits in the subsequent weeks, until a new route is selected based on route prioritization the following month.



- o If contamination is present (5% or more contaminated material by volume):
  - a. Waste Zero Coordinator will document customer's level and types of contamination in digital format with photos
  - b. Cart/Container will be tagged with 'Oops Tag" (see Attachment 1 section below) and be collected as recycle. Recology disposes contents as garbage at no cost to customer.
  - c. Waste Zero Coordinator will call and/or email customer within four business days of the on-site visual audit date. Calls will bring attention to the non-recyclable material(s) in the recycling cart/container and offer educational resources such as, but not limited to: a presentation, waste audit, signage, stickers, trainings.
  - d. Waste Zero Coordinator will develop and mail a site-specific contamination report and Notification Letter to the customer. Letters will offer education resources to correct contamination as described above. Letters will also state potential fee if contamination continues.
- o 2<sup>nd</sup> On-site Visual Audit audit will occur after all Commercial and Multifamily routes have been completed. (approximately two to three months)
  - o *If contamination is not present (less than 5%)*: Customer is serviced by collection truck as recycling. Customer will continue to receive on-site visual audits in the subsequent weeks, until a new route from pad inspections is selected based on route prioritization the following month.
  - o If contamination is present (5% or more contaminated material by volume):
    - a. Waste Zero Coordinator will document customer's level and types of contamination in digital format with photos.
    - b. Cart/Container will be tagged with 'Oops Tag" (see Attachment 1 section below) and be collected as recycle. Recology disposes contents as garbage at no cost to customer.
    - c. Waste Zero Coordinator will call and/or email customer within four business days of the on-site visual audit date. Calls will bring attention to the non-recyclable material(s) in the recycling cart/container and offer educational resources: presentation, waste audit, signage, stickers, trainings.
    - d. Waste Zero Coordinator will develop and mail a site-specific contamination report and Notice or Warning Letter to the customer (dependent on if customer has previously received documentation of contamination). Letters will offer education resources to correct contamination as described above. Letters will also state the potential fee if contamination continues.
- o 3<sup>rd</sup> On-site Visual Audit audit will occur at least a week after 2<sup>nd</sup> visual audit date
  - o *If contamination is not present (less than 5%)*: Customer is serviced by collection truck as recycling. Customer will continue to receive on-site visual audits in the subsequent weeks, until a new route is selected based on route prioritization the following month.



- a. If a customer does not have three instances of documented contamination, the customer will not be audited again until all other collection days/routes are audited based on pad-inspections (~ six months)
- If contamination is present (5% or more contaminated material by volume) and customer has NOT received the first and/or second notice of violation
  - a. Waste Zero Coordinator will document customer's level and types of contamination in digital format with photos
  - b. Cart/Container will be collected as recycle. Recology disposes contents as garbage at no cost to customer.
  - c. Waste Zero Coordinator will call and/or email customer within four business days of the on-site visual audit date. Calls will bring attention to the non-recyclable material(s) in the recycling cart/container and offer educational resources: presentation, waste audit, signage, stickers, trainings.
  - d. Waste Zero Coordinator will develop and mail a site-specific contamination report and Notice or Warning Letter to the customer. Letters will offer education resources to correct contamination as described above. Letters will also state the potential fee if contamination continues.
- If contamination is present (5% or more contaminated material by volume) and it's the third notice of violation for a customer:
  - a. Waste Zero Coordinator will document customer's level and types of contamination in digital format with photos.
  - b. Cart/Container will be tagged with 'Oops Tag' (see Attachment 2 section below), be collected as garbage and may be charged a fee for collection of contaminated recycling as specified in the contract amendment (i.e. contamination fee).
  - c. Waste Zero Coordinator will assess corresponding monthly pad inspection of route to confirm contamination levels exceed the 5% by volume contamination threshold for that month.
  - d. Waste Zero Coordinator will call and/or email customer within four business days of the on-site visual audit date. Calls will bring attention to the non-recyclable material in the recycling cart/container and offer educational resources: presentation, waste audit, signage, stickers, trainings. Call will also state a contamination fee may be applied (if corresponding route-level pad inspection illustrates five percent or more (5+%) contaminated material).
  - e. Waste Zero Coordinator will develop and mail a site-specific contamination report and Final Warning Letter to the customer. Letters will offer education resources to correct contamination as described above.



- f. Waste Zero Coordinator will apply contamination fee on customer account only when monthly pad inspection results for the route correlate with results of on-site visual audit.
- g. Customers are flagged for reoccurring visual audits moving forward as described below.
- 4. Customers that have one or two instances of documented contamination during the audit month will not receive another on-site visual audit until all customers have received second and third audits (approximately six months). Future on-site visual audits will build on the previous contamination instances.
- 5. Customers that have three or more (3+) instances of documented contamination through on-site visual audits procedure:
  - Customers that are found to have three or more (3+) instances of documented contamination will be subject to every other week on-site visual audits, even after a new route is selected for on-site audits the following month.
  - Each time a customer is visually audited and found to have five percent or more (5+%) contaminated material by volume:
    - Waste Zero Coordinator will document customer's level and types of contamination in digital format with photos. Cart/Container will be tagged with 'Oops Tag" (see Attachment section below).
    - Waste Zero Coordinator will assess corresponding monthly pad inspection of route to confirm contamination levels exceed the 5% by volume contamination threshold for that month.
    - Waste Zero Coordinator may apply contamination fee and collect cart as garbage on customer specific account when route-level pad inspection results correlate with results of on-site visual audit.
    - o Waste Zero Coordinator will call and/or email customer within four business days of the on-site visual audit date. Calls will bring attention to the non-recyclable material in the recycling cart/container and offer educational resources: presentation, waste audit, signage, stickers, trainings. Call will also state a contamination fee may be applied for the collection of contaminated recycling as garbage (if corresponding route-level pad inspection illustrates five percent (5%) or more contaminated material).
    - o Waste Zero Coordinator will develop and mail a site-specific contamination report to the customer.
- 6. Customers that have ten or more (10+) instances of documented contamination through on-site visual audits procedure:
  - Customers that are found to have ten or more (10+) instances (~ four months) of documented contamination from the start of the program will be subject to removal of recycling service.
  - Due to the variability, each customer account must be reviewed and discussed with the City to determine if removal of service is appropriate.
  - If customer has been responsive to communication from Recology:
    - Waste Zero Coordinator to review history of communication and response from customer



- o Waste Zero Coordinator to call customer to follow up on:
  - o Implementation of best management practices and/or offer outreach; presentation, training, waste audit or signage if customer has yet to request.
  - o Provide one month timeframe to implement and/or conduct outreach.
  - o Provide notification about potential removal of service if contamination continues after one month period is over.
  - Customer must demonstrate effort has been made to decrease contamination on-site through requesting a site visit from Recology's outreach team to evaluate current recycling program.
    - a. If contamination levels above 5% continue after one month, Recology will contact the City to request removal of recycling service
      - i. Recology must provide history of communication and education conducted on site to the City.
    - b. City must approval removal of service.
- If customer has not been responsive throughout the communication from Recology:
  - o Waste Zero Coordinator will call customer in final attempt to:
    - o Offer best management practices and/or outreach; presentation, training, waste audit or signage.
    - o Provide one month timeframe to implement and/or conduct outreach.
    - Provide notification about potential removal of service if contamination continues after one month period is over.
    - O Customer must demonstrate effort has been made to decrease contamination on-site through requesting site visit from Recology's outreach team to evaluate current recycling program.
      - a. If contamination levels above 5% continue after one month, Recology will contact the City to request removal of recycling service.
        - i. Recology must provide history of communication and education conducted on site to the City.
      - b. City must approval removal of service.
- 7. Repeat process (steps 3-6) every month after completing the first round of visual on-site audits. Selection of new route to target for on-site visual audits will be based on previous month's pad inspections until all Commercial and Multifamily customers have been audited (approximately sixmonths).
- 8. After six-month process is completed: all routes will be re-audited using the same prioritization process (steps 3-7).
- 9. City Reporting
  - Recology will provide a monthly report to the City regarding contamination monitoring efforts documenting:
    - o Total number of route-level pad inspections completed (by type)
    - o Total number of on-site customer audits completed



- o Total number of customers with contamination levels exceeding 5% by volume for recycling
- o Average monthly contamination by sector across all customers who receive visual on-site audits
- o Total number of customers charged the contamination fee
- o Total number of recycling customer cancellations
- o Total number of presentations conducted for customers that received a notice of contamination
- o Total number of educational site visits providing technical assistance for customers that received a notice of contamination
- o Total number of poster requests from customers that received a notice of contamination
- o Ranked list of common contaminants identified during the on-site visual audit
- o Call log from contamination outbound calls

## **Attachments**

1. First and Second instance of contamination Oops Tag





2. Third and subsequent instance of contamination Oops Tag

Your materials do not meet collection requirements. Prohibited materials (garbage and compostables) will impact recyclability. Continuing to place prohibited materials in your bin may result in a contamination fee.	
We found the following prohibited item(s) in your recycling bin:	
Loose plastic bags	
☐ Styrofoam™	
Liquids	
Yard waste	
Food waste	
Textiles / Clothing	
Latex gloves	
☐ Electronics, small appliances	
☐ Wax cardboard	
Paper towels	
Other:	
Please remove the items identified above from your recycling bin to ensure consistent and on-time collection. Visit recology.com/store for drop off options for some of the items above.	
Thank you for doing your part to keep materials empty, clean and dry, and recycling right in the Shoreline community!	
Questions about what goes where?	
recology.com/shoreline 206.763.4444	