

# 3.7

To: Board of Commissioners  
From: Dan Goossen, Director of Organics Recycling  
Josh Estey, Director of Operations  
Date: October 23, 2024  
RE: ORF Contamination Policy Amendment

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On April 24<sup>th</sup>, the Board of Commissioners approved the ORF Contamination Policy to be implemented on July 1, 2024. The policy was created to clean up incoming streams of inputs to the compost process, with a special focus on food waste. Though the policy includes financial penalties for commercial food waste loads containing excessive or particularly problematic contamination, the goal of the policy was to create a tool that would help generators and haulers identify areas of concern and work with them to reduce the likelihood of ongoing or future contamination. Three months post-implementation, the policy has had a significant positive effect on the quality of material arriving at the ORF.

From July through September, a total of 160 load inspections were carried out. Of those inspected, only 20 loads resulted in a fine, with the majority of those resulting in the minimum \$50 incidental contamination fee due to inclusion of bagged trash, personal hygiene products or similar items. Staff are optimistic about the trajectory of the program as it relates to contamination reduction in food waste. Food waste haulers have responded to the contamination policy by increasing their scrutiny of the organics they collect, enhancing communication with their generators, and maintaining more frequent contact with staff at the compost facility. Following a couple of contamination incidents in the yard waste portion of the facility, it became clear that the policy needs a minor amendment to protect the quality of all inputs.

The proposed amended policy is attached with redline changes included. The three changes in the amended policy are as follows:

- Removal of the second half of the first sentence in section 1 on page three. This change will allow the policy to be applied to both food waste and yard waste:
  - “ORF personnel will inspect incoming loads ~~once they are dumped in the food residual receiving bays.~~”
- Addition of the following sentence at the end of section 3 on page three.
  - “Associated fines are outlined in the CSWD ORF Contamination Rates Table.”

- Removal of the CSWD ORF Contamination Rates Table to a standalone document of the same name. This would allow for adjustments to associated fines without needing to bring the entire document to the full board each time there was a rate change at the transfer station or rates needed to be adjusted for some similar reason. Any future rates changes related to ORF contamination would still need to be approved by the Executive Director. A draft of the standalone CSWD ORF Contamination Rates Table is attached.

**BE IT RESOLVED that the Board of Commissioners approves the removal and addition of language to the Organics Recycling Facility Contamination Policy as specified in this memo, as well as separating the accompanying CSWD ORF Contamination Rates Table as a standalone document.**

## ORGANICS RECYCLING FACILITY CONTAMINATION POLICY

Adopted by CSWD Board of Commissioners on 4/24/2024

Effective 07/01/2024

Proposed Amendments on 08/23/2024

### Purpose:

This policy is to provide a procedure for inspecting incoming loads delivered to the CSWD Organics Recycling Facility (ORF) for contamination and the corrective actions to be taken with the intent to:

- 1) Remediate contamination of incoming loads;
- 2) Improve communications between organics haulers, their customers, state programs/personnel, ORF personnel, and CSWD staff regarding material specification requirements,
- 3) Maximize ORF operational efficiency, and
- 4) Minimize worker exposure to potentially harmful materials and ensure the safe and optimal operation of the ORF processing equipment.

### Definitions:

#### Acceptable Organics —

- **Food Waste:**
  - All food scraps of any kind.
  - Certified, clearly labeled compostable bags used for lining food scrap containers.
  - Coffee filters & tea bags (paper only—no plastic tea bags).
  - Newspaper and untreated paper bags used to line food scrap containers.
  - Paper towels and napkins – only if they DO NOT contain body fluids or chemicals of any kind.
  - Wooden or bamboo stirrers, toothpicks (no plastic frills), chopsticks.
  - Uncoated paper leaf bags.
- **Yard Waste**
  - Leaves
  - Grass clippings
  - Weeds
  - Garden trimmings
  - House plants
  - Natural wood (tree trimmings, limbs, clean stumps, brush)

**Contamination** — Any material received in loads at the ORF other than Acceptable Organics.

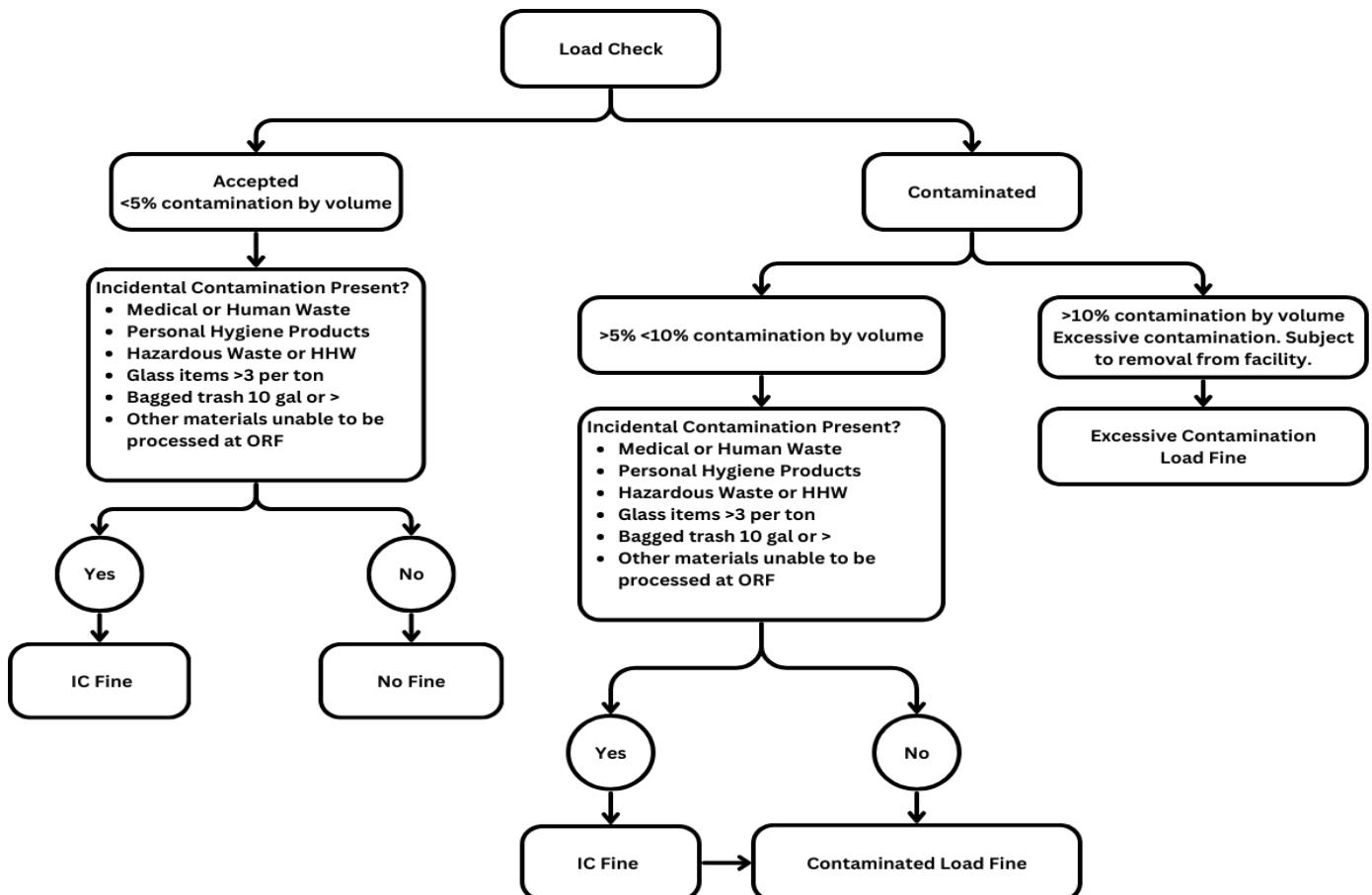
**Contaminated Load** — A load of material received at the ORF that contains more than 5% contamination by volume resulting in a fine.

**Excessively Contaminated load** — A load of material received at the ORF that contains more than 10% contamination by volume resulting in a fine. These loads may be removed from the site and diverted to a transfer station for landfill disposal.

**Incidental Contamination** — A load of material received at the ORF that contains particularly problematic materials. Receipt of any of these materials as listed below will result in a fine. The fine for incidental contamination can be issued if the load is below the 5% Contaminated Load threshold or in addition to a Contaminated Load fine but not in addition to Excessively Contaminated loads.

- 1 or more 10 gal or greater plastic bags containing trash.
- Glass Items exceeding 3 items per Ton.
- Hazardous waste or Household Hazardous Waste.
- Medical Waste or Human Waste.
- Personal Hygiene products including diapers and feminine hygiene products.
- Other materials unable to be processed at the ORF.

## Procedures:



1. ORF personnel will inspect incoming loads once they are dumped ~~in the food-residual-receiving bays.~~ When necessary, a bucket loader operator will back-drag loads to make visualizing contamination easier.
2. If the load is deemed to be contaminated, CSWD staff will complete a contaminated load report and will aim to complete a contaminated load report and send the hauler a digital copy within two business days. All load reports will include CSWD Outreach Staff contact information and encourage the use of CSWD staff support to lessen the likelihood of future contaminated loads.
3. Any fine outlined on the contaminated load report will be billed to the hauler. The hauler shall pay the penalty for contaminated loads, and late fees and penalties for non-payment of fines in accordance with the CSWD Solid Waste Management Ordinance and any policies and procedures set forth by CSWD's finance department. [Associated fines are outlined in the CSWD ORF Contamination Rates Table.](#)

## CSWD ORF Contamination Rates Table

### Food Waste Rates Table:

Load Status	Contamination Level	Associated Fines
Accepted	<5% contamination by volume	No fine
Contaminated	>5% - <10% contamination by volume	\$75/Ton (minimum \$75)
Excessively Contaminated	>10% contamination by volume	\$150/Ton (minimum \$150)
Incidental Contamination	<ul style="list-style-type: none"> <li>• 1 or more 10 gal or greater plastic bags containing trash</li> <li>• Glass Items exceeding 3 items per Ton</li> <li>• Hazardous waste or Household Hazardous Waste</li> <li>• Medical Waste/Human Waste</li> <li>• Personal Hygiene products including diapers and feminine hygiene products.</li> <li>• Other materials unable to be processed at the ORF</li> </ul>	\$50/load

### Yard Waste Rates Table:

Load Status	Contamination Level	Associated Fines
Excessively Contaminated	<ul style="list-style-type: none"> <li>• &gt;10% contamination by volume</li> </ul>	\$200/Ton (minimum \$200)