

**Task List Based on December 2020 Final Draft of SB 1383 Short-Lived Climate Pollutants (SLCP) Regulations**

*This document lists the main requirements of jurisdictions but doesn't outline the many new requirements on facility operators and local enforcement agencies (LEA's). Applicable tasks depend on the types of compliance, contamination monitoring, and waste evaluation procedures a jurisdiction chooses to use.*

WHEN	WHO	TASK	UVWMA Staff Comments
<b>ORGANICS RECYCLING CAPACITY ASSESSMENT AND PLAN</b>			
2020/2021	COUNTY	Identify/assess existing organics generation, available processing capacity (inside county and nearby) and project future generation/facility needs. 12 year time frame.	<i>NapaSan reached out and is interested in opening up a discussion about taking some organics from up valley</i>
Due 8-1-22, 8-1-24, 8-1-29, 8-1-34		If shortages projected, jurisdictions submit implementation schedules to county; county reports to state. Implementation schedule shall be submitted within 120 days of the date the report is submitted.	
<b>FOOD RECOVERY CAPACITY ASSESSMENT AND PLAN</b>			
2020/2021	COUNTY	Estimate the amount of edible food that will be disposed by commercial generators, identify existing capacity at food recovery orgs/services, identify new or expanded food recovery orgs/services that will be used, identify amount of new or expanded capacity needed.	
Due 8-1-22, 8-1-24, 8-1-29, 8-1-34		If county identifies new or expanded capacity needed - submit implementation schedule to state demonstrating how it will ensure capacity. It shall include timelines or milestones for planning efforts including obtaining funding and identification of facilities' or other activities that could be used for additional capacity. Each jurisdiction will need to submit implementation schedule to the county, county will report to the state. Implementation schedule due within 120 days of submitting report. 8/1/22, report on 1/1/22 - 12/21/24. 8/1/24, report on 1/1/25-12/31/34. 8/1/34 report on 1/1/35-12/31/44	
<b>ORGANICS DIVERSION PROGRAM - JURISDICTION AND HAULER REQUIREMENTS</b>			
By 1-1-22	UVDS	Offer organics service to all generators (residential and commercial) in 3-container system, includes multifamily, townhomes and mobile homes.	<i>We have tentatively decided to not allow compostable plastics, it is up to the jurisdiction and it is not required by the regs.</i>
By 1-1-22		Offer organics collection service to all unserved residential, commercial and industrial entities (including public facilities, schools, state, and federal properties). CalRecycle will enforce upon non-complaint public schools, state and federal properties but jurisdictions are to provide education and offer services.	<i>The Vets Home will need to comply with commercial composting, residential composting and edible food recovery requirements. UVWMA staff are required to provide education and CalRecycle will enforce if necessary. UVDS will also need to determine how to reach those who are not currently their customers</i>
Beginning 1-1-22		Label collection containers with SB 1383 compliant labels. Jurisdiction shall place label on each new container or lid. Can comply with either labels on containers or info imprinted onto containers. Labels shall clearly indicate primary items that are prohibited container contaminants	<i>Will present label design to UVWMA board before printing. Confirming with CalRecycle that labeling is required for all three, not just organics. We the jurisdiction are responsible for this but we can designate the responsibility to UVDS, which CalRecycle recommends is done with franchise agreement</i>
Containers purchased after 1-1-22 and all by 1-1-36		Provide containers with SB 1383-compliant lid colors. Jurisdiction is not required to replace functional containers purchased prior to 1/1/22 until end of useful life of those containers or 1/1/36, whichever comes first.	<i>Color requirements also apply to dumpsters. For roll offs that are used for different purposes – more info in FAQ online but yes CalRecycle intends to require bin color requirements to roll offs too even if they aren't consistently used for the same material. If compactors are privately owned by businesses, they "may" comply with color requirements</i>
Beginning 1-1-22 and annually thereafter		Complete compliance review of covered commercial entities beginning January 1, 2022 and annually thereafter. Complete compliance review of all solid waste collection accounts for commercial businesses that generate two cubic yards or more per week. Can be an in office review of business records such as billing accounts, physical inspection is not required.	<i>We need to do both compliance review and route review annually. Both together ensure compliance with 1383</i>

WHEN	WHO	TASK	UVWMA Staff Comments
<b>ORGANICS DIVERSION PROGRAM - ORGANIC WASTE GENERATOR REQUIREMENTS</b>			
Beginning 1-1-22	ORGANIC WASTE GENERATORS	Subscribe to organics collection services OR self-haul to facility processes or recovers source separated organic waste.	<i>Will CFL or Whitehall Lane be able to accept self hauled organic waste drop offs? When?</i>
Beginning 1-1-22		Commercial and residential self haulers must source separate organic waste and take organic waste to a organic waste processing facility. Commercial self haulers must comply with record keeping requirements, residential self haulers are exempt from record keeping portion. Commercial records are subject to inspection by jurisdiction. Records shall include: receipts/weight tickets, amount/tons transported to each facility.	<i>How are we going to reach self haulers with this information?</i>
Beginning 1-1-22		Commercial business owners (including multifamily property owners) shall: arrange for organic waste collection services; annually provide info to employees, contractors, tenants and customers about sorting; if there are news tenants they must be notified of sorting techniques within 14 days of moving in; provide access to properties during inspections.	
Beginning 1-1-22		Generators that are also commercial businesses (does not include multifamily) shall: provide organics and recycling containers for customers; the container body or lid must conform with collection service container colors OR bins must be labeled; prohibit employees from placing organic waste in a container that is not designated to receive organic waste; periodically inspect containers for contamination; educate employees on source separation if contamination observed. If a business already has containers that are still functional but don't comply with color requirements, they don't need to be replaced until 2036.	<i>I'm not sure if we (UVA) need to inspect but the requirement to provide all containers for customers is in the model ordinance. Perhaps enforcement would be if we come across it or it is reported by member of the public</i>
<b>CONTAMINATION MONITORING PROGRAM</b>			
Beginning 4-1-22 and annually thereafter	UVDS and UVWMA	Monitor trash, recyclables, and organics collection containers to minimize contamination. Complete route reviews of all commercial sites and residences beginning 4-1-22 and annually thereafter. Conduct sufficient number of route reviews to adequately determine overall compliance. May prioritize inspections of entities that are more likely to be out of compliance. Conduct in a manner that results in all hauler routes being reviewed annually. Containers may be randomly selected along a hauler route. OR The jurisdiction shall conduct waste evaluations for prohibited contaminants at least twice per year in two distinct seasons of the year. See page 68 of final regs for more details on waste evaluations.	<i>Section 18984.5 says to conduct route review in a manner that results in all hauler routes being reviewed annually. Section 18995.1 says conduct sufficient number of route reviews to adequately determine overall compliance. (AG Note - I didn't find that they specified how many or what percentage of containers need to be evaluated). We have a choice between route reviews or waste characterization studies. Solid waste site operators waste elevations are gray container only, one gray container evaluation per quarter, take sample from truck that represents typical operating day. Which is different than the waste evaluations for jurisdictions. Jurisdiction ones are all three containers twice per year in two distinct seasons. Each container type must be sampled and they must be taken from different areas. There are also requirements on the number of samples based on number of generators on the route</i>
Beginning 4-1-22		For instances of contamination, notify the generator of the violation. The notice at a minimum shall include info on the requirement to separate materials into appropriate containers. Photo may be included (but not required). The notice can be left on container, gate or door at time of violation. It could also be mailed or emailed to generator. It is not required for a jurisdiction to impose administrative civil penalties on generators in violation of the prohibited container contaminants. There are separate noticing requirements if a jurisdiction chooses to use waste evaluations for contamination monitoring	<i>We will need to write description of process - where notice will be left, will it be in writing, how will UVDS notify UVWMA of instances of contamination</i>
<b>EDUCATION</b>			
Prior to 2-1-22 and annually thereafter	UVDS and UVWMA	Provide educational information annually to residential and commercial collection customers. Shall provide: info organic waste generators requirements to properly separate materials; methods for - preventing organic waste generation, recycling organics onsite, community composting and any other local requirements; info on methane reduction benefits of reducing landfill disposal of organics, methods of organic waste recovery the hauler uses; info on how to recover organic waste and haulers available; public health impacts of landfilled organics; info on edible food donation; self haul requirements. Jurisdictions shall translate materials into any non-English language spoken by a substantial number of the public. Can be provided via print or electronic media. Direct contact would be an addition, not replacement to mail or electronic notices.	<i>Set timeline for this to be developed/finalized. May able to use CalRecycle provided info because there is a lot to be provided. I think this is in combination with or replacement of 1826 annual notice we are sending out now. Should we formalize responsibility for printing costs? For example right now with 1826 letters and brochures UVA creates and pays for print materials.</i>
Beginning 1-1-22	UVWMA	Expand commercial education and technical assistance to those without recyclables and/or organics collection service through franchised hauler.	<i>How will we make a list of and reach out to those without service?</i>
Prior to 2-1-22 and annually thereafter	UVWMA, UVDS and Env Health ???	Educate commercial edible food generators annually on local edible food recovery program; commercial edible food generator requirements; info on food recovery orgs; info on food waste reduction. Can be combined with regular organic waste education notice	<i>This is just education portion of edible food recovery program but do we want to formalize potential partnership with PBES for this part or will UVWMA handle all requirements of edible food recovery?</i>

WHEN	WHO	TASK	UVWMA Staff Comments
<b>EDIBLE FOOD RECOVERY PROGRAM - JURISDICTION REQUIREMENTS</b>			
Beginning 1-1-22	UVWMA and Env Health ?? And UVDS?	Increase access to edible food recovery organizations/services and edible food recovery capacity	Will determine with capacity study happening now
By 1-1-22		Identify Tier 1 and Tier 2 edible food generators	
1-1-22 compliance for Tier 1, 1-1-24 compliance for Tier 2		Monitor and record compliance of generators, recovery organizations, service providers. Tier 1 monitoring and compliance begins 1-1-22, Tier 2 monitoring and compliance begins 1-1-24.	Who will do this? UVDS mentioned doing outreach about food recovery when doing regular site visits but I think that would be an addition, but they wouldn't necessary handle all inspections?
By 2-1-22 and annually		Develop list of local food recovery service providers and organizations, post on websites (of all jurisdictions?). List shall be updated annually. List shall include: name & address, contact info, service area and types of food the org can accept for recovery.	There is no formal direction on if each member jurisdiction shall list this info on their website. However CalRecycle did state that the info should be easily accessed by members of the public. Each member jurisdiction should at minimum direct the public to the UVWMA website (within the County site) for more info.
<b>EDIBLE FOOD RECOVERY PROGRAM - GENERATOR &amp; RECOVERY/SERVICE ORG REQUIREMENTS</b>			
1-1-22 compliance for Tier 1, 1-1-24 compliance for Tier 2	Tier 1 and Tier 2 edible food generators	Recover the maximum amount of edible food	How will we monitor?
		Secure written arrangements w recovery orgs/services or self-haul to orgs that accept recovered food (self haul also requires written agreement)	
		Document and maintain records on: each service that receives its food; copies of contracts/agreements; record of the following for each agreement - name, address, contact info of the service, types of food that will be collected, frequency of collection, quantity to be collected	
Arrange for food recovery for large events and venues (if operator doesn't provide food themselves but allows for food to be provided, the event operator shall require food provider to comply)			
Beginning 1-1-22	Food Recovery Services and Food Recovery Organizations	Food recovery service requirements (this is only person or entities that collect/transport food from generator to food recovery org) - records requirements. Shall maintain: name, address, contact info for each generator it collects from; quantity collected from each; quantity transported to each org; name, address, contact info for each organization that it transports edible food to	
		Food recovery organization requirements - records requirements. Shall maintain: name, address, contact info for each generator it receives food from; quantity it receives; name, address and contact info for reach food recovery service it receives food from	
<b>PROCUREMENT</b>			
By 1-1-22 and recalculate each 5 ys	UVWMA or Member Jurisdictions ??	Purchase organic waste products for use or giveaway - .08 tons per resident, CalRecycle will provide notice to jurisdictions and will update every five years or before January 1. Can comply by directly procuring recovered organic waste products for use or giveaway; requiring with a contract or agreement hat a direct service provider to the jurisdiction procure organic waste products and provide written documentation. Organic waste product's are: compost, renewable gas, electricity from biomass conversion, mulch	UVWMA can procure on behalf of member jurisdictions. However I believe there will be confusion if we do this because only a portion of Napa County is in UVWMA. Napa County staff are currently researching the possibility of a multi-jurisdiction carbon farming project which would meet procurement and tentative Climate Action Committee goals
Beginning 1-1-22	Member Jurisdictions	Purchase paper products, printing and writing paper with certified recycled content if fitness and quality are equal to non-recycled content products. Lots of different things referenced but I think it all means 30% min post consumer waste required. Also should meet the standard of 16 Code of Federal Regulations (CFR) Section 260.12, which states that "A product or package should not be marketed as recyclable unless it can be collected, separated, or otherwise recovered from the waste stream through an established recycling program for reuse or use in manufacturing or assembling another item." Jurisdiction shall require anyone it purchases paper products from to certify in writing the minimum recycled content percentage (or exact) and confirm the paper is property labeled according to CFR section 260.12	We should include in MOU. There is also a section on recycled content paper procurement in the model ordinance

WHEN	WHO	TASK	UVWMA Staff Comments
<b>ADMINISTRATIVE UPDATES</b>			
By 1-1-22	UVWMA and Member Jurisdictions	UVWMA will need to update JPA agreement to include 1383, 341 and 1826	<i>Per CalRecycle - We must have a provision in a contract, agreement, or other authorization that requires a hauler to comply with the requirements.</i>
By 1-1-22		Jurisdiction shall require haulers to identify facilities to which they will transport organic waste (and haulers must seek approval from jurisdiction) and require haulers providing organic waste collection service to comply with requirements in Article 3 (organic waste collection service).	
By 1-1-22		Draft and complete MOU's between JPA and member jurisdictions that specify responsibilities of the member jurisdictions regarding the implementation of SB 1383	
<b>ORDINANCES</b>			
By 1-1-22	UVWMA and Member Jurisdictions ??	Adopt ordinance mandating compliance with all requirements of 1383. Includes compliance by waste generators and haulers. Compliance by entities involved in waste collections, food recovery activities, organic product procurement, monitoring, documentation, reporting and enforcement. As well as compliance with any penalties and waivers adopted by the jurisdiction.	<i>CalRecycle has released a model ordinance that covers all aspects required by 1383. Tentatively I believe each member jurisdiction will have the same or very similar ordinance as well as the JPA. A potential complication could be that Napa County has three different waste haulers so we'd need to be sure the ordinances are accurate for that</i>
<b>WAIVERS</b>			
By 1-1-22	UVWMA	Determine if we will allow waivers. Waivers are for De Minimis, Physical Space, collection frequency. Establish protocols for approving and documenting any jurisdiction's De Minimis, Physical Space, collection frequency waivers.	<i>Do we want to offer all three waiver types? We'd tentatively need approval or input from the LEA if we offer the collection frequency waiver.</i>
Every 5 ys after issuance		Inspect and update any business waivers. Update every 5 years	
If needed		If facility processing our waste has unforeseen operational restrictions or operational failure - can allow organic waste to be landfilled for up to 90 days from date of restriction or failure. Jurisdiction shall notify CalRecycle within 10 days. Waivers are also allowed for landfill disposal of disaster debris, waste from homeless encampment clean ups, organic waste from the boundaries of a CDFA quarantine area.	

WHEN	WHO	TASK	UWVMA Staff Comments
<b>ENFORCEMENT, CIVIL PENALTIES</b>			
On or before 1-1-22	UWVMA, Napa County and UVDS ??	On or before January 1, 2022 a jurisdiction shall have inspection and enforcement program in place.	<i>We need to have written description of our inspection and enforcement program that includes delegating flow and procedures. We should add to agreement with UVDS their requirement to provide data to us but I believe this could also be included in ordinance? Depending on flow, we may need to also include in MOU with member jurisdictions</i>
By 1-1-22, until 12-31-23		Provide notification, education, and outreach to all found to be in violation.	<i>Not required to enforce until 1-1-24, education only until then if contamination or other violations found. Moving forward in 2024/beyond, I believe if contamination found it does not require enforcement.</i>
Beginning 1-1-24		Initiate enforcement actions: notice of violation requiring compliance within 60 days, if no compliance by deadline in notice - impose penalties. Deadlines may be extended due to extenuating circumstances.	<i>Who is going to enforce? Napa County staff for all areas? Member jurisdiction staff?</i>
Beginning 1-1-24		Impose civil penalties consistent with Gov Code Secs 53069.4, 25132, and 36900. First violation - base penalty \$50-\$100 per violation. Second violation - \$100-\$200 per violation. Third violation - \$250-\$500 per violation.	<i>Do we need to set actual penalty amounts in our ordinance or can the ranges from CalRecycle be used? Who will collect monies and what can those funds be used for?</i>
Beginning 1-1-22		Create detailed electronic record of enforcement: inspections, route and compliance reviews, violations and educational measures. Shall include: identifying info for subject(s) of inspection (name or account name, description of route or addresses covered in route review, list of accounts reviewed), date, person who conducted inspection, findings (including NOV's), any relevant evidence (such as but not limited to photos)	<i>Will need to determine how UVDS will get info to UWVMA. May also need to work out how other jurisdictions will get info to UWVMA if necessary. All needs to be stored in one location.</i>
Beginning 1-1-22	UWVMA if necessary	Enforcement against waste generators located in multiple jurisdictions - If multiple jurisdictions determine that CalRecycle enforcement may be more effective, multiple jurisdictions may file a join enforcement referral	
Beginning 1-1-22	UWVMA and Member Jurisdictions ??	Create record, respond to, and document complaints by public. Create procedure to receive and investigate complaints, complaints must be investigated within 90 days. Procedure shall provide that complaints be in writing and include: if not anonymous name and contact info, identity of alleged violator, description of violation including location, relevant documentation or photographic evidence, identity of witness if known. Shall provide a procedure to notify the complainant of the results of their complaint if identity/contact info is known	<i>We should include in MOU, I don't recall reading anything that would prevent member jurisdictions websites from directing to County website. We need to create a procedure to receive complaints, which should be written and include all info mentioned in cell to the left.</i>

WHEN	WHO	TASK	UVWMA Staff Comments
<b>IMPLEMENTATION RECORD</b>			
Beginning 1-1-22	UVWMA with info to also be provided by UVDS and member jurisdictions	Create overall "implementation record" accessible to CalRecycle w/in 10 days. All records should be included in the implementation record within 60 days of the creation of the record. Records should be maintained for at least 5 years. Record shall be stored in one central location, physical or electronic. At a minimum, records shall include the following:	<i>Overall decision - how and where we will keep implementation record. We will need info from UVDS and member jurisdictions to meet all requirements from CalRecycle. We should include in MOU with member jurisdictions and updated agreement with UVDS if it is not already included.</i>
		A copy of all ordinances or other similarly enforceable mechanisms, contracts, and agreements	
		A written description of the jurisdiction's inspection and enforcement program that it uses to comply with Sections 18995.1 and 18995.4.	<i>18995.1 outlines requirements for compliance reviews, route reviews/waste evaluations, edible food generator inspections, education (2022-2023), enforcement (starting 2024). 18995.4 outlines requirements for jurisdictions to enforce</i>
		All organic waste collection service records required by Section 18984.4.	<i>18984.4 outlines requirement for jurisdiction to describe how it will comply with organics collection, what areas are covered and if we will collect compostable plastics.</i>
		All contamination minimization records required by Section 18984.6	<i>18984.6 outlines record keeping requirements regarding route reviews, copies of notices issued to generators</i>
		All waiver and exemption records required by Section 18984.14	<i>18984.14 outlines record keeping requirements for waivers and exemptions</i>
		All education and outreach records required by Section 18985.3	<i>18985.3 outlines recordkeeping for education - flyers, brochures, etc., the date sent, how many, social media posts, etc. I think it'd be important to include keeping these records in MOU's and agreement with UVDS</i>
		All hauler program records required by Section 18988.4.	<i>18988.4 outlines recordkeeping requirement for approved haulers, how we issue/revoke/deny hauler approvals, self haul/back haul requirements. We will also need to decide if we will allow back hauling or consider back hauling compliance</i>
		All jurisdiction edible food recovery program records required by Section 18991.2.	<i>18991.2 outlines recordkeeping requirements for edible food recovery - list of commercial generators, edible food recovery orgs/services, steps jurisdiction took to increase capacity</i>
		All recovered organic waste procurement target records required by Section 1 18993.2	<i>18993.2 outlines recordkeeping requirements regarding procurement - how we will comply, where comes from, all invoices, etc.</i>
		All recycled content paper procurement records required by Section 18993.4	<i>18993.4 outlines recordkeeping requirements for recycled content paper purchasing- keep copies of invoices or receipts, copies of certifications/verifications that are required. Should include in MOU. Asked CalRecycle to confirm, member jurisdictions would need to comply and could not assign paper purchasing to JPA</i>
		All inspection, route review, and compliance review documents generated pursuant to the requirements of Section 18995.1(d).	<i>18995.1(d) requires documentation of route reviews, compliance reviews, inspections.</i>
		All records of enforcement actions undertaken	
		All records of complaints and investigations of complaints required by Section 18995.3 and compliance with the jurisdiction's inspection and enforcement requirements of Sections 18995.1.	<i>18995.3 outlines jurisdiction responsibility to investigate complaints from the public and have a procedure. 18995.1 outlines requirements for compliance reviews, route reviews, food generator inspections</i>

WHEN	WHO	TASK	UUVMA Staff Comments
<b>REPORTING</b>			
By 4-1-22		Report to CalRecycle on implementation by April 1, 2022. Report shall include: copy of ordinances, type of service provided to generators, total number served, if we allow compostable plastics, if we allow plastic bags, primary contact info, contact for purposes of enforcement if different than above.	
By 10-1-22. Then 8-1-23 and annually thereafter		Prepare and submit comprehensive report on all requirements on or before October 1, 2022 - report on January 1, 2022 thru June 30, 2022. On or before August 1, 2023 report on previous calendar year. Repeat August 1 reporting for previous calendar year moving forward	<i>Verifying with CalRecycle that we (UVA) can continue to report on behalf of jurisdictions. Reporting also requires data on CalGreen and MWELo projects so they should also be included in MOU's</i>
<b>CALRECYCLE REVIEW OF JURISDICTIONS</b>			
		CalRecycle will evaluate compliance by jurisdictions. CalRecycle will review jurisdictions implementation record and may conduct inspections, compliance reviews and route reviews. CalRecycle shall enforce via: issue notice of violation requiring compliance within 90 days. Extension of up to 10 days may be issued. Extending deadline farther would require putting jurisdiction on Corrective Action Plan (CAP) - if CalRecycle finds additional time is necessary for compliance but jurisdiction has made substantial effort. CalRecycle will enforce on jurisdictions if we do not enforce	
		Accommodate CalRecycle evaluation of Jurisdiction compliance.	
		CalRecycle penalties on jurisdictions - minor violation between \$500 per violation and \$4000 per violation per day, moderate violation between \$4000 per violation and \$7500 per violation per day, major violation between \$7500 per violation and \$10000 per violation per day.	

**SB 1383 TASK LIST FOR POTENTIAL MOU'S WITH MEMBER JURISDICTIONS**

CATEGORY	TASK	UVWMA STAFF NOTES
ORGANICS RECYCLING CAPACITY ASSESSMENT AND PLAN & FOOD RECOVERY CAPACITY ASSESSMENT AND PLAN	If Napa County's assessments find that additional capacity is needed for either organics recycling or food recovery, jurisdictions must submit implementation schedules to CalRecycle. Implementation schedule must be submitted to the state within 120 days of the date the initial report is submitted (which is due 8-1-22).	If there is a shortage projected in UVWMA's area, per the regs each jurisdiction would need to submit an implementation schedule to CalRecycle. CalRecycle has informed UVWMA staff, that UVWMA could submit a schedule for all member jurisdictions in one plan. More detail forthcoming, if necessary jurisdictions may need to inform CalRecycle that UVWMA is submitting a plan on their behalf.
EDIBLE FOOD RECOVERY PROGRAM	Develop list of local food recovery service providers and organizations, post on website. List shall be updated annually. List shall include: name & address, contact info, service area and types of food the org can accept for recovery.	Member jurisdictions will need to, at minimum, direct the public to the UVWMA website (within the Napa County website)
PROCUREMENT	Purchase organic waste products for use or giveaway - .08 tons per resident, CalRecycle will provide notice to jurisdictions and will update every five years or before January 1. Can comply by directly procuring recovered organic waste products for use or giveaway; requiring with a contract or agreement hat a direct service provider to the jurisdiction procure organic waste products and provide written documentation. Organic waste product's are: compost, renewable gas, electricity from biomass conversion, mulch	Each member jurisdiction shall procure their assigned amount however its also possible for a JPA to procure on behalf of member jurisdictions. Napa County staff are currently researching the possibility of a multi-jurisdiction carbon farming project which would meet procurement and tentative Climate Action Committee goals. The Sonoma County JPA, Zero Waste Sonoma, is looking into purchasing on behalf of their member jurisdictions through something like an agreement with the smart train and the smart train would procure biomass energy or renewable gas for fuel



CATEGORY	TASK	UVWMA STAFF NOTES
PROCUREMENT	<p>Purchase paper products, printing and writing paper with certified recycled content if fitness and quality are equal to non-recycled content products. Lots of different things referenced but I think it all means 30% min post consumer waste required. Also should meet the standard of 16 Code of Federal Regulations (CFR) Section 260.12, which states that "A product or package should not be marketed as recyclable unless it can be collected, separated, or otherwise recovered from the waste stream through an established recycling program for reuse or use in manufacturing or assembling another item." Jurisdiction shall require anyone it purchases paper products from to certify in writing the minimum recycled content percentage (or exact) and confirm the paper is properly labeled according to CFR section 260.12</p>	<p>We should include in MOU or member jurisdictions will likely not comply. There is also a section on recycled content paper procurement in the model ordinance</p>
ORDINANCES	<p>Adopt ordinance mandating compliance with all requirements of 1383. Includes compliance by waste generators and haulers. Compliance by entities involved in waste collections, food recovery activities, organic product procurement, monitoring, documentation, reporting and enforcement. As well as compliance with any penalties and waivers adopted by the jurisdiction.</p>	<p>CalRecycle has released a model ordinance that covers all aspects required by 1383. Tentatively I believe each member jurisdiction will need to pass the same (or very similar) ordinance as well as the JPA. A potential complication could be that Napa County has three different waste haulers so we'd need to be sure the ordinance is accurate for that</p>
ENFORCEMENT	<p>On or before January 1, 2022 a jurisdiction shall have inspection and enforcement program in place.</p>	<p>We need to have written description of our inspection and enforcement program that includes delegating flow and procedures. We should add to agreement with UVDS their requirement to provide data to us but I believe this could also be included in ordinance? Depending on flow, we may need to also include in MOU with member jurisdictions</p>

CATEGORY	TASK	UVWMA STAFF NOTES
ENFORCEMENT	Create record, respond to, and document complaints by public. Create procedure to receive and investigate complaints, complaints must be investigated within 90 days. Procedure shall provide that complaints be in writing and include: if not anonymous name and contact info, identity of alleged violator, description of violation including location, relevant documentation or photographic evidence, identity of witness if known. Shall provide a procedure to notify the complainant of the results of their complaint if identity/contact info is known	I don't recall reading anything that would prevent member jurisdictions websites from directing to UVWMA website but I am awaiting confirmation from CalRecycle. Based on the answer for food recovery listings, I think at minimum member jurisdictions would need to direct the public to the UVWMA website to submit complaints. We need to create a procedure to receive complaints, which should be written and include all info mentioned in cell to the left.
IMPLEMENTATION RECORD	Create overall "implementation record" accessible to CalRecycle w/in 10 days. All records should be included in the implementation record within 60 days of the creation of the record. Records should be maintained for at least 5 years. Record shall be stored in one central location, physical or electronic.	Overall decision - how and where we will keep implementation record. We will need info from UVDS and member jurisdictions to meet all requirements from CalRecycle. For example, we'd need recycled content paper purchasing records from each member jurisdiction.
REPORTING	Prepare and submit comprehensive report on all requirements on or before October 1, 2022 - report on January 1, 2022 thru June 30, 2022. On or before August 1, 2023 report on previous calendar year. Repeat August 1 reporting for previous calendar year moving forward	Verifying with CalRecycle that we (UVA) can continue to report on behalf of jurisdictions we currently do and I don't believe this has changed. Reporting also requires data on CalGreen and MWELo projects so those requirements should also be included in MOU's