



Recology Contamination Reduction Plan for the City of SeaTac

Introduction:

The goal of this plan is to reduce the contamination in Commercial and Multifamily Customers' Recyclables Containers to a level of less than ten percent (10%) by volume of collected Recyclables.

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

- **Compactor or Roll-off-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 carts/containers must have more than fifty percent (50%) material by volume in order to be assessed.

Definitions:

- **Contamination Fee:** Is calculated and charged based on the recycling container capacity. The contamination fee is \$10/yard.
- **Contamination Percentage:** Is the percent of contamination by volume based on an estimated visual assessment of the material in the top layer of the recycle container/cart. Recycling carts/containers must have more than fifty percent (50%) material by volume in order to be assessed.

Recycling Contamination Reduction Program Outline

1. Ongoing Compactor or Roll-Off Inspections Procedure:

- Recology will conduct compactor and/or roll-off inspections of each Commercial and Multifamily site at Recology's Material Recovery Facility in Seattle when applicable.
- Inspections will be conducted by Material Recovery Facility staff to determine if recycling contamination in the load by volume is ten percent or more (10+%). This process includes:
 - A commercial recycling truck arriving at the Material Recovery Facility with a compactor or roll-off
 - Load of recycling is dumped in a designated area to conduct inspection
 - Inspection is conducted by Recology staff. The entire load will be visually reviewed.
 - Recology staff will take photos. Photos will include a photo of the entire pile of material and photos of individual contaminants.
 - Contamination percentage is estimated based on the visual assessment and volume of contaminations found in the load.
 - *If contamination is not present (less than 10%):*



- Recology staff will document that the route did not exceed contamination levels in digital format with photos
- Report is shared with Waste Zero Coordinator (outreach staff) to track collection days
- *If contamination is present (10% or more contaminated material by volume):*
 - Recology staff will document the contaminants and information in digital format with photos
 - Report is shared with Waste Zero Coordinator (outreach staff) to track and start the process for contamination program highlighted below

2. On-Site Visual Recycling Audits Procedure:

- Recology will conduct targeted on-site visual recycling audits at each site along routes to determine if contamination by volume is ten percent or more (10+%).
- Process of determining contamination percentage (10+%):
 - Waste Zero Coordinator will lift the recycle cart/container lid(s). No material will be moved or touched in the visual assessment.
 - Photos will be taken to include a top down shot to capture the edges of the cart/container, including photos of individual contaminants.
 - The contamination percentage is an estimate based on visual assessment and volume of contaminants found in recycle container/cart.
 - Only the top layer of material can be safely assessed, therefore, the volume of visible contamination as determined using the process above will be assumed to represent the percent of contamination for the volume of material within the container.
- 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, material is not touched or moved in the container. This process includes:
 - 1st On-Site Visual Audit
 - *If contamination is not present (less than 10%):* Customer is serviced by collection truck as recycling. Customer will continue to receive on-site visual audits in the subsequent month(s).
 - *If contamination is present (10% 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 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. Waste Zero Coordinator may contact customer on-site if possible. Communication 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, and 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.
- 2nd On-site Visual Audit – audit will occur at least no sooner than month (30 days) after the first audit was completed.
 - *If contamination is not present (less than 10%):* Customer is serviced by collection truck as recycling. Customer will continue to receive on-site visual audits in the subsequent month(s).
 - *If contamination is present (10% 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 collected as recycle, unless contaminants are not removed and driver marks contaminated. Regular driver and customer service protocol will activate if driver marks account contaminated.
 - c. Waste Zero Coordinator will call and/or email customer within four business days of the on-site visual audit date. Waste Zero Coordinator may contact customer on-site if possible. Communication 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.
 - i. If the customer receives a Warning Letter (second instance of contamination), they need to contact Recology within 10 days for outreach or educational resources to avoid the contamination fee.
 - 1. If customer does not contact Recology within 10 days, Waste Zero Coordinator will email City staff the contamination report and City Staff will determine within three business days if the contamination fee can be applied. The City must contact Recology within three business days with decision on what accounts the contamination fee can be applied to.
- 3rd On-site Visual Audit – a audit will occur no sooner than one month (30 days) after the second audit was completed.
 - *If contamination is not present (less than 10%):*



- a. Customer is serviced by collection truck as recycling.
 - b. Customer will continue to receive on-site visual audits in the subsequent weeks.
- *If contamination is present (10% 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, unless contaminants are not removed, and driver marks contaminated. Regular driver and customer service protocol will activate if driver marks account contaminated.
 - c. Waste Zero Coordinator will call and/or email customer within four business days of the on-site visual audit date. Waste Zero Coordinator may contact customer on-site if possible. Communication 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.
 - i. If the customer receives a Warning Letter (second instance of contamination), they need to contact Recology within 10 days for outreach or educational resources to avoid the contamination fee.
 - 1. If customer does not contact Recology within 10 days, Waste Zero Coordinator will email City staff the contamination report and City Staff will determine within three business days if the contamination fee can be applied. The City must contact Recology within three business days with decision on what accounts the contamination fee can be applied to.
- *If contamination is present (10% 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.’”
 - c. Waste Zero Coordinator will email City staff the contamination report and City staff will determine within three business days if the contamination fee can be applied. The City must contact Recology



- within three business days with decision on what accounts the contamination fee can be applied to.
- d. Waste Zero Coordinator will call and/or email customer within four business days of the on-site visual audit date. Waste Zero Coordinator may contact customer on-site if possible. Communication 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 will be applied.
 - 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, if determined can do so by City staff.
 - g. Customers are flagged for reoccurring visual audits moving forward as described below.
3. 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 frequent on-site visual audits, customer can be audited as frequently as the container is serviced.
 - Each time a customer is visually audited and found to have ten percent or more (10+%) 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.'
 - Cart/Container will be collected as recycle, unless contaminants are not removed, and driver marks contaminated. Regular driver and customer service protocol will activate if driver marks account contaminated.
 - Waste Zero Coordinator will email City staff the contamination report and City staff will determine within three business days if the contamination fee can be applied. The City must contact Recology within three business days with decision on what accounts the contamination fee can be applied to.
 - Waste Zero Coordinator will apply contamination fee
 - Waste Zero Coordinator will call and/or email customer within four business days of the on-site visual audit date. Waste Zero Coordinator may contact customer on-site if possible. Communication 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 will be applied.
 - Waste Zero Coordinator will develop and mail a site-specific contamination report to the customer.



- After the fourth failed audit, a customer can request to restart the program (steps 2-3) if they can demonstrate a good faith attempt in addressing on-site contamination issues. The customer must have conducted more than three of the best management practices below.
 - A good faith attempt can be understood as:
 - Schedule an on-site visit with Recology outreach staff
 - Begin to implement best management practices identified by Recology staff
 - Schedule an on-site presentation or tabling with Recology outreach staff
 - Participate in Waste Wise program or other door-to-door outreach (multi-family only)
 - Make structure changes to collection system (i.e. architectural plans for improving enclosures, locks ordered, etc.)
- 4. Customer dispute of audit results
 - Recology will review any audit disputes with the customer. Customers may request to escalate billing and audit disputes to the Waste Zero Manager and the City.
- 5. 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 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
 - Waste Zero Coordinator to call customer to follow up on:
 - Implementation of best management practices and/or offer outreach; presentation, training, waste audit or signage if customer has yet to request.
 - Provide a one-month timeframe to implement and/or conduct outreach.
 - Provide notification about potential removal of service if contamination continues.
 - 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 10+% continue, 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:*
 - Waste Zero Coordinator will call customer in final attempt to:
 - Offer best management practices and/or outreach; presentation, training, waste audit or signage.
 - Customer must provide timeframe to implement and/or conduct outreach.



- Provide notification about potential removal of service if contamination continues after the one-month period is over.
- 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 10+% continue, 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.

6. City Monthly Reporting

- Recology will provide a monthly report to the City regarding contamination monitoring efforts documenting:
 - Total number of on-site customer audits completed
 - Total number of on-site customer containers with 50% or less material by volume
 - Total number of customers with contamination levels exceeding 10+% by volume for recycling
 - Average monthly contamination of all customers who receive visual on-site audits
 - Total number of customers charged the contamination fee
 - Total number of recycling customer cancellations
 - Total number of presentations conducted for customers that received a notice of contamination
 - Total number of educational site visits providing technical assistance for customers that received a notice of contamination
 - Total number of poster requests from customers that received a notice of contamination
 - Ranked list of common contaminants identified during the on-site visual audit
 - Call log from contamination outbound calls