Meeting #6 Agenda (October 10, 3-4:30pm): Bin colors; Load rejection

1. Welcome & Agenda Overview
2. **Policy Feedback: Bin colors**

NEW SECTION.  **Sec. xxx.** A new section is added to chapter [70A.205](http://app.leg.wa.gov/RCW/default.aspx?cite=70A.205) RCW to read as follows:

BIN LID COLORS AND LABELS.

(1) (a) Beginning January 1, 2026, lids used for solid waste collection containers must be consistent with the requirements of this section, except in any jurisdiction that purchased new collection containers and lids for use by all customers throughout the jurisdiction between January 1, 2023, and January 1, 2024

(b) It is the preferred coloring arrangement for collection containers to be the same colors as are required of container lids under this section. Jurisdictions and solid waste collection companies are encouraged to use solid waste collection containers that are the preferred coloring arrangement. Solid waste collection containers provided to a customer in a service area that newly receives any type of solid waste collection service after January 1, 2026, must be consistent with the preferred coloring arrangement.

(2) In each jurisdiction planning under this chapter, the lids of indoor or outdoor containers provided for collection services, including multifamily, commercial, government and other public places, institutional, and curbside residential collection services must be provided in a color-coded manner consistent with the requirements of this section in order to reduce contamination::

(a)(i) In a jurisdiction where source-separated recyclable materials and source-separated organic materials are collected separately, a gray or black container lid may be used only for the collection of solid waste that is not a source-separated recyclable material or a source-separated organic material;

(ii) In a jurisdiction where source-separated recyclable materials or organic materials are not collected separately, a gray or black container lid may be used for any solid waste, including organic material or recyclable material that is not separately collected in the jurisdiction.

(b) A blue container lid may be used only for source-separated recyclable materials. The contents of the blue-lidded container must be transported to a facility that recovers the materials designated for collection in the blue container.

(c) A green or brown container lid may be used only for source-separated organic materials and the contents of green or brown-lidded containers must be transported, directly or indirectly, to an organic materials management facility.

(d) A color other than green, brown, blue, black, or gray may be used only in accordance with any rules adopted by the department.

(e) By rule, the department may determine the appropriate container lid color or colors to be used for materials that could conceivably be placed in containers with multiple lid colors specified in (a) through (d) of this subsection.

(f) The color-coding requirements for solid waste collection container lids under this section do not apply to containers with a volume of at least 10 cubic yards that:

(i) Are used on a temporary basis by multiple customers of a jurisdiction or solid waste collection company; and

(ii) Are alternately used for temporary periods for multiple types of solid waste depending on the specific needs of the customer.

(3)(a) By January 1, 2026, all containers for waste collection must bear a clear and conspicuous label on each container and lid, using background colors or a font that matches the coloring arrangement for lids specified in subsection (2), specifying what materials are allowed to be placed in each container. The requirements of this subsection may be satisfied by:

(i) A label placed on a container that includes either language or graphic images, or both, that indicate the primary materials accepted and the primary materials prohibited in that container; or

(ii) Imprinted text or graphic images that indicate the primary materials accepted and the primary materials prohibited in that container.

(b) Containers with a volume of at least one cubic yard must feature a minimum of a two foot by two foot area containing the label required in (a) of this section, and label text with a font height of at least ten inches.

(c) Containers of the type specified in (2)(f) of this section must feature a temporary label meeting the requirements of (3)(b) of this section.

(d) Containers that are located indoors and that do not have a lid or that are contained in a multiple-compartment container must feature a visible label. This label must be placed in proximity to the location in which the solid waste is intended to be deposited.

(4) The department may provide model labeling text and graphic images for optional use by local governments and solid waste collection companies that meets the requirements of this section.

(5) A jurisdiction or solid waste collection company may comply with the requirements of this section by providing a container or containers that are split or divided into segregated sections, instead of an entire container, as long as the lids of the separate sections of a split container comply with the container color requirements, labeling requirements, and material limitations specified in this section.

(6) Carpets, noncompostable paper, and hazardous wood waste may not be collected in a container with a green or brown lid. Hazardous wood waste may not be collected in a container with a green or brown lid. The department may adopt rules to prohibit additional waste stream contaminants from being placed in a container with a green or brown lid or a container with a blue lid.

(7) Notwithstanding the applicability of an exemption under (1), (2), or (3) of this section, the contents of containers used for the collection source-separated recyclable materials must be transported to a facility that recovers the materials, and the contents of containers used for the collection of organic materials must be transported, directly or indirectly, to an organic materials management facility.

(8) The definitions in this subsection apply throughout this section unless the context clearly requires otherwise.

(a)(i) " Container with a blue lid" or "blue-lidded container" means a container where the body of the container is any color and the lid is blue in color;

(ii) Hardware, such as hinges and wheels on a blue-lidded container, may be any color.

(b)(i) "Green or brown-lidded container" or "Container with a green or brown lid" means a container where the body of the container is any color and the lid is green or brown in color;

(ii) Hardware, such as hinges and wheels on a green or brown-lidded container, may be any color.

(c)(i) "Gray or black-lidded container" or "Container with a black or gray lid" means a container where the body of the container is any color and the lid is gray or black in color;

(ii) Hardware, such as hinges and wheels, on a gray or black-lidded container may be any color.

(iii) A galvanized metal container or lid that is unpainted and gray or silver in appearance is considered to be a gray container or lid for purposes of this section.

**Sec. 2** RCW 70A.207.050 and 2024 c 341 s 202 are each amended to read as follows:

(1) The department, through the center, must develop and administer grant programs to support the implementation of the requirements of chapter 341, Laws of 2024 and chapter 180, Laws of 2022, with priority given to grants that support the implementation of RCW 70A.205.540 and 70A.205.545. Eligible recipients of grants under this section may include businesses that are subject to organic material management requirements, local governments, federally recognized Indian tribes and federally recognized Indian tribal government entities, nonprofit organizations, or organic material management facilities. Eligible expenses by grant recipients include education, outreach, technical assistance, indoor and outdoor infrastructure, transportation and processing infrastructure, and enforcement costs. Recipients of grant funding for collection containers or lids must color and label solid waste collection containers consistent with the preferred coloring provisions described in [section 303] of this act.

(2) The department may not require, as a condition of financial assistance under this section, that matching funds be made available by a local government recipient. The department must provide assistance to each local government that demonstrates eligibility for grant assistance under this section.

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| **Input: Bin colors** |
| * Jenna M.: Question about cart color research and prompt. Agree that colors do indicate things to people, but question about whether colors are prompting enough even if not in line with what’s proposed here. Does it have to be black/gray to indicate garbage or is just the color enough? Last year, I provided an estimate a city like Kirkland. It is a substantial cost for a city to change bin colors. I’d look for more information on the grants and support that could be provided there. Re Section 3: we were talking about container sizes or lids – do lids need to be color coded for dumpsters under 10 yards? Do these rules apply on all containers – SF, MF, community, and dumpsters? * Holly Y.: It is a bit convoluted of language. I understand intent, but I think it could be more clear in exactly where we’re going with different type of bin and requirements associated with them. Unclear to me if this was targeting bins that are used in jurisdictional pickup or private entities that do back of house and self-haul. It mentioned preferred coloring arrangement – preferred implies suggestion, but there are requirements. Tweak language to ensure people can comply with the laws. Clear about requirements surrounding bin colors – preferred color scheme – careful of language like shall, may, preferred, etc. * Kate K.: City of Seattle supports to the extent possible. Been recommended many times to help improve diversion and decrease contamination. In Section (1)(d) – I want to make sure that it’s super conspicuous that an alternative color can be used for separately collected materials. Want to make sure we don’t inadvertently ban colors for other separately colored materials – would like to clarify further. * Neil E.: CA Container Color and Labeling Requirements in SB 1383   Jurisdictions must designate the color of each container based upon the collection service that is being provided to residents and businesses.   * + The color scheme for collection containers must meet either of these requirements:     - The lid of the container is the correct designated color     - The body of the container is the correct designated color and the lid is also the same specified color or may be gray or black   + The color requirements only apply to the external portions of the container, not inside the container.   + A jurisdiction is not required to replace functional containers that do not comply with the color requirements prior to the end of the useful life of those containers, including containers purchased prior to January 1, 2022, or prior to January 1, 2036, whichever comes first.   Container Labeling   * + Jurisdictions are required to provide labels on the new lids or container bodies that explain which materials are allowed and prohibited in the container.   + Labels must include text and/or images.   + Labels can be stickers or imprinted directly onto the lid or body of the container. * Travis D.: What percentage of jurisdictions who already meet this? Are lids easily replaced (technically, not cost-wise)?   + Jenna M.: Agree on the question about lid replacement - is this a hard or easy task for the haulers? * Jun W.: Other than color, are other visual cues to indicate the container's target material? EX. emblem, signage. Just thinking for people who may be colorblind. * Ron J.: Echo Jenna, Holly, and Kate, and share concerns and questions. Would support, in theory, the colors – have been doing for a few years. Have moved away from green for recycling to blue (over time to manage costs). Look at costs of bins/lids themselves, but also cost of labor to roll those carts out and get old ones back. Rolling out carts and decals is really difficult – can’t get to them all – and very labor intensive and expensive. Would need funding (10s of millions) statewide to do this. Dumpsters – might need some research to ensure you can get all the different colors for dumpster lids. Lids are not all flat – fluted or corrugated – and can’t hold a decal. Same is true for roll off. Does this mean all carts changed – or everything new? And run to failure – if all new – would mean throwing away a lot of good carts.   + Jenna M.: Echo Ron's comment - the cost of cart replacement or lids or changes has a substantial labor cost and we'd need support on that.   + Eliza K.: Want to echo Ron’s last thought. Would there be a plan for recycling or reusing any lids/containers that would be replaced since landfilling them would go against the intentions of waste reduction? Second to that, as it’s written, it doesn’t seem like there’s language stating how long between the lids, so curious if we would add a date for when those would eventually need to be replaced.     - Robbie G.: Ideally we'd be recycling a lot of new carts! * Dan C.: City of Tacoma is concerned with the cost of transition. * Robbie G.: In any of the studies did they see a spike in contamination during the initial transition to new colors? I would think there would be a big potential for lots of contaminated organics initially. * Travis D.: Section 6, page 2 re: carpets, etc. Why that’s there given some of the other definitions? What’s the intent of that section? Also, Section 2 re: grant funding – where is that funding going to come from? * Socorro M. (SPU): A couple of years ago, we changed our MF garbage dumpsters colors. They were always green, and we changed them to gray. The way that we’ve been doing it, whenever there are new properties that want new dumpsters or clean dumpsters, we deliver a new one. It’s been a slow rollout. It’s a way of doing it that takes a long time, but it makes it a little more practical. Also, the dumpsters normally have black lids. While a dumpster is possible to change the color of the body, the lid is normally black. There are different lids, but the market share of those is very small. * Ted C.: it is not clear that that the benefit of uniform colors statewide is worth the tremendous cost. * Alli K.: Question about the really limited range of dates between Jan. 1, 2023 – Jan. 1, 2024 – why is there this one-year date range?   + Heather T.: It was the Bellingham exemption – just for that one year. * Rick V.: Our estimates would be us internally touching ¾ of a million carts. Concerned with having to change 750K carts across the start and effort to undertake. Understanding what the deployment of what this strategy would take and on-ramp for the new standard would take effect – deploying new colors (on one street, it may seem a number of colors at any one time if just rolling out with new customers and would lead to confusion with customers). Historically, have not used colors, but instead relied on education. Drivers can’t see through the cart and it would confuse them on which cart is which. Echo concerns about the cost. About unique colors, we have two programs – some creative fundraising efforts – where we’ve deployed a Carts for Kids program where we make donations to the kids program. Those carts are purple. Pink lemonade – carts in the market – and raise money and engage the public. * Gena J.: Also the funding and efforts required to make this change could be spent on other efforts to reduce consumption and contamination. * Jay B.: Cedar Grove doesn’t do residential/consumer. Cedar Grove does do some commercial hauling, which doesn’t seem like a huge issue for our commercial customers. Our preference has always been to focus on residential and potentially people who operate in that area. We don’t want confusion in that areas. Lids and color schemes are not a problem in commercial. How does it impact various sizes of dumpsters? * Rod W.: Echo concerns about implementation challenges and cost benefits. Another concern is timing. Jan 1., 2026 is only 6 months after the date of the bill. Same with the labels. Doing that within 6 months is a short time frame and not logistically reasonable. I saw grant language and I question the amount of funding that would be available for that. It would be an expensive policy. A couple sections that didn’t get a lot of discussion is that the requirement under Section 7 which is a requirement that the contents of the containers have to be delivered to the facilities that matches the color, but the load could be contaminated and then transferred somewhere else. Rulemaking authority for Ecology to determine what goes in a container based on it’s color is a big change and right now, local governments make those decisions.   + Jun W.: I agree with Rod. * Neil E.: It is pretty costly, but rolled out implementation with SB1383. CA requirements in the chat (don’t try and replace useful bin) – long runway to 2036. Have not seen any jurisdictions that have transitioned in a way that led to duplicative bin colors. Bins were a portion of overall costs of new program. In big scheme – not the costliest item – infrastructure was more. * Rick V.: Wanted to highlight a few comments regarding stickers/decals that would be placed on the commercial bins. I like some of the general items outlined with the graphic/text expectations. I get caught up in the restriction size and what’s required, which could be an issue. Local teams should be able to decide size and placement on a dumpster. It might not fit on some dumpsters based on size requirement in language.   + Ron J.: Another issue to get to dumpsters is there are multiple decals. Containers with so many decals that they don’t do any good and also get damaged. You start to create challenges when you manage decals. Decals also don’t last forever. Recycle decals are also very hard to deploy and implement. We eventually went to a hot stamp on our carts; not saying this is the best way or ideal, but it’s one way to standardize. Customer type does make a difference and we’d need flexibility for local communities on this. * Brad L.: I think Neil hit on a lot of what everyone is concerned with. These are local programs and this is a state mandate. We’d need a cost estimate. Recognize that containers have a good (~30 year) life. Curbside bins come with a 10-year warranty and should not have to be replaced. We should start with cost and compare benefits. Labeling regardless of cart color is probably the single biggest thing. Consumer education is the key to all of this. * Keith J.: I wanted to make a comment that we’ve been talking about carts/colors/lids/stickers for many years now. In the past, it’s always been some of the same arguments and points have been made. I do support the many points that have been made today, but at some point, we need to make a change and have that change be brought in over time. I also agree that wholesale throwing away of carts does not make sense. If something could be worked out over time (e.g., 10 year), it’ll be easier for hauler to deal with and municipalities to provide funding to change the cart colors. I’m not sure how that might get done and it would be a better conversation with the haulers and municipalities who contract them. Has been a decade with no progress and people continue to buy bins in various colors – something needs to be done. This will help reduce confusion and the contamination that comes from that confusion. Anything we can do to stop contamination – because someone is from another jurisdiction. * Ted C.: Our services are already branded by certain colors in the jurisdictions we serve for decades. Changing colors now would be very confusing to our customers and drivers. It would be cost prohibitive to replace now, it would be very confusing to replace at failure because carts last for decades, we have tens of thousands that have been out for 40 years and are in great shape. We would have multiple colors for the same service, just creating the confusing you are trying to avoid. It can't be good to replace perfectly good carts, that is a lot of plastic. * Rick V.: Would there be any reduction in outreach efforts as a result of this policy? * WRRA: We share the goal of reducing contamination and increasing harmonization but believe containers must be able to serve their useful life to avoid creating both physical plastic waste and substantial economic waste. At this time, We echo the concerns of other public and private sector stakeholders expressed on the 10/10 call and believe those goals are best served through a focus on implementing the two sweeping pieces of Organics legislation (HB 1799 and HB 2301) to meet the greater goal of reducing organics disposal by 75% by 2030. * Divert: This language is unclear and is poorly written from a policy perspective. At a baseline, it needs to be re-written to ensure that private businesses, waste haulers, and jurisdictions understand who is responsible for replacing which bins and where that funding is going to actually come. The language currently outlines a "preferred" color system, which would imply that this is a suggestion, but then provides a series of requirements that must be met surrounding the replacement of bins. There is also a series of sentences using the phrase "may", but the way this section was presented did not imply choice. It would be great to see this reworked with proper thought given to how we can ease compliance with this section.   + We understand the value of a bin-specific coloring system, but we think that special attention needs to be given to the idea that this bill would require tons of plastic to be thrown out all for the sake of compliance with a color system. In our fight to limit and divert food waste, we cannot forget about other waste streams that are being generated as a result of our impact. Can we truly say that the members of this work group are committed to zero waste if we are backing this policy without giving thought to the carbon intensity of this initiative or the plastic pollution it would create? If the intention would be to recycle these plastic bins, please point to where these recycling facilities will be. We have concerns on the ability for this plastic to actually be recycled.   + Lastly, it was pointed out that it would be incredibly costly to do this and the solution was to write grant language allowing this initiative to be covered. However, even with that language, it is currently unclear if the available grant funding would cover these costs. Has any cost analysis been made? * Ecology: Recommend adding: (c) Containers with a volume of under one cubic yard must feature a minimum of a one foot by one foot area containing the label required in (a) of this section, and label text with a font height of x inches. |

1. **Policy Feedback: Load rejection**

**Section 3. A new section is added to RCW 70A.205 to read as follows:**

(1) An organic materials management facility must reject, at no cost to the facility, loads delivered to the facility that are determined to contain unacceptable levels of contamination.

(2) The department may adopt rules to implement the requirements of this section.

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| **Input: Load rejection** |
| * Wendy W.: That would be great if we could get it to the recycling system. The hard part is the devil in the details. Who’s going to do that? Curbside? MF side? Totally get not wanting contamination, but hard to see it when things are not transparent. We would need a ton of detail on how to track that and get it back to the source, reduce it. Totally get it and figuring that out is going to be tough. * Brad L.: Source separation responsibility is with the generator. We really need to do that consumer education. This has come up recently. You don’t find out until later. It’s dumped, it’s picked up, but who’s paying for it? Real practical questions about it. We get the intent. Holding the generator responsible for the source separation. * Robbie G.: It is already in the interest of a facility to reject a contaminated load when possible, where is the need to make it law? * Ron J.: How do we define unacceptable level of contamination? Who decides and evaluates? And as far as I know, if we were to deliver a seriously contaminated load, the composter would reject it, or issue a warning. * Eliza K.: No real issues with the intent of this language, but we would want to see the DOE acceptable contamination levels in coordinator with haulers and processors. The current language is ‘may’, but it would need to be a ‘must.’ If those contamination limits are left up to the processor, they could manage it. If it’s left to haulers, we could see high levels of contamination accepted. We would need to see staff guidance as well on how to ensure customers are complying with guidelines. * Jay B.: From composter perspective, not entirely sure how necessary this language is at this point. Ecology did rulemaking – most facilities have a 5% inbound limit and we do our best to reject loads and make sure we make a clean finished product. I would want to flag that that it’s already covered for compost facilities. If there’s a proposed change to that, I’d be curious to know the direction for this. * Keith J.: RCW without a WAC is useless. It doesn’t give us structure or decision making. Agree there should be a limit for contaminants, but we’re making a change in the way we see things now. We want to reject loads with contamination, but eventually we’re going to need a way to process those as well. Eventually, we will need to be able to process loads without contamination and should not be required to reject it if they think they can process them. It should be up to the facility, and I don’t think it really needs to be created into law. * Kate K.: I am in support of this in terms of a way to level the playing field, so a composter doesn’t lose customers by rejecting high levels of contamination. I’m confused because last year in 2301, there was a portion. It seems like this language was already passed except for this new language that would be broader; it doesn’t hone in on food waste. Is there something else that I’m missing?   + Heather T.: They wouldn’t be able to include this specific thing (i.e., load rejection) in the rulemaking because it’s not written down in the statute.   + Cullen N.: We will be opening 350 and it does address the contamination thresholds. Putting this into statute ensures that rules for load rejection would be made. * Chris T.: Want to echo what Keith and Kate said. If we are concerned about addressing contaminants in the process, I think we should be able to ensure that we’re going to have facilities that are set up to address contamination in the first place. Ensure that we regulate what is and isn’t acceptable for the finished products we are creating. We did address earlier this year – feedstock and contamination in finished products, but did not address what happens (who pays) if a load is rejected. We should all be undertaking a greater level of responsibility. * Ron J.: We’re concerned about how you would evaluate that contamination. No way to inspect contamination on the route truck until it’s dumped. Once it’s on the ground, what do you do with it? Load it again and take it to landfill? We measure waste in weight. How are you going to actually calculate the contamination because contamination can be light and fluffy? We can say from experience here in Olympia that we’ve had load rejected. Composters already do this. Compostable packaging was causing issues and it took a couple of months to get loads cleaned up. Tip organics at transfer station – making it easy to put contaminated loads in landfill – but led to a lot of good materials going to landfill. Helped us cull bad customers – left with good customers and it’s since grown back. Competing leg – requiring organics subscriptions eventually – but it cannot be contaminated – and we may also be adding compostable packing into mix. We should work on getting one thing right before moving to next thing. * Wendy W.: How and who would do the enforcement of contamination levels - both the threshold and cost of disposing rejected loads? * Robbie G.: Letting a facility deal with a contaminated load, if they choose to accept it, would help ensure that more material is composted in the long haul. If they're required to reject it, then that material is landfilled. It may be a small percentage that is landfilled, but the small percentages add up. * Cullen N.: FYI: existing contamination limits at compost facilities defined here: [WAC 173-350-220:](https://app.leg.wa.gov/WAC/default.aspx?cite=173-350-220) See Table 220-B.   + Keith J.: That is for finished compost. Good indicator but not for incoming feedstocks.     - Cullen N.: Thanks for the clarification Keith, just noting too that the contamination of finished product will also be addressed in the upcoming rulemaking.       * Keith J.: Might be for the 350 rule making but requiring methods to deal with contamination I.e. equipment that might help.   + **INCOMING FEEDSTOCK:** [WAC173-350-220(6)(F)(iii)(C](https://app.leg.wa.gov/WAC/default.aspx?cite=173-350-220)) Procedures and criteria for ensuring that only the feedstocks described will be accepted. This includes a plan for rejecting feedstocks contaminated with greater than **five percent physical contaminants by volume**, or a plan to accept and separate contaminated loads from noncontaminated loads, and reduce physical contaminants to an acceptable level prior to composting;   + **OUTGOING FINISHED PRODUCT:** [WAC 173-350-220:](https://app.leg.wa.gov/WAC/default.aspx?cite=173-350-220) Table 220-B indicates outgoing finished product must address physical contaminants at <= 1% by weight total, not to exceed .25% film plastic by weight; (I) Compost facilities must provide a label or information sheet to purchasers of compost that exceeds .1 percent film plastic by weight but does not exceed .25 percent film plastic by weight. The label or information sheet must include the statement in subsection (4)(f)(iii)(D)(II) of this section, or equivalent language approved by jurisdictional health department or the department. * Rusty C.: Going along with what Chris was saying re: going through rejected loads. You have non G-certified haulers that can pick up yard waste and organics. Once you reject that load, that hauler now needs a G-certificate to haul that load. We have to actually look at UTC policy and allowing organic yard waste haulers to be able to haul their contaminated loads as MSW without a G-certificate, and that’s complicated. I’d rather see compost facilities be able to handle the contaminants on their tipping floors instead. * WRRA: WRRA concurs with other stakeholders that the proposed language may be duplicative of existing authorities and create additional challenges. When read together language in the bin color section that requires container contents to be delivered to specific facilities, this language appears to create a situation where the waste would have no legal destination. WRRA supports inbound contamination standards for organics facilities, but as discussed by many stakeholders, more dialogue on this topic would be necessary to avoid unintended consequences and recommend keeping the issue out of the 2025 legislation. * Divert: With the language written as is, it is currently unclear as to what the purpose of this section is. Is the point of determining what is and is not an unacceptable level of contamination to ensure that organics do not have contamination in the first place or to ensure that contamination does not end up in finished compost or soil amendment products? If it’s the former, there is a visual rule in place that says composters must reject loads with greater than 5 percent contamination by volume or have a plan for how to remove contamination before the residual is used as a feedstock. The challenge with this rule is that not all industry participants appear to follow this rule and it’s also challenging to train employees to use a visual eyeball test to determine what is above 5%. This would indicate that the visual load rejection test might not be the best way to approach this solution. If the purpose of this rule is to address the latter (ensure that contamination does not end up in finished compost or soil amendment products), then it would be better to ensure we have specific testing standards in place on finished products to ensure that we are not reintroducing large amounts of glass, metal, and plastics into our agricultural food supply chain.   + We understand that last year’s bill created a rule-making process regarding contamination of the finished product being developed by organics management facilities and that this idea of load rejection is an extension of ensuring that the final product is less contaminated, however this language misses the mark and fails to actively address the problem. We hope to see more active language surrounding what it means for a product to be contaminated and what guidelines will be provided to organics management facilities to determine contamination, rather than letting an employee simply reject a load for off take to a landfill.   + Additionally, we would like to better understand what is considered contaminations in this case. The concept has not fully been defined by my knowledge and it would be helpful to have an outline for organics management facilities to create best practices. Will that be defined in the rule-making set forth by last year's bill or will the language in here intend to define those parameters?   + Lastly - what are we doing to better educate participants in source separation programs to ensure that a load they are providing is not full of contaminants? This language seems like an easy out for organic's processors to simply push the problem onto consumers rather than actively work to solve the problem themselves. It would be great to have some language requiring organics management facilities to properly conduct outreach and education and minimize load rejection. We are in agreement with the other voices that have expressed concern surrounding this language as it is written, especially as it relates to the concerns for creating inadvertent hauling requirements for materials deemed to be MSW due to this language, and hope to see a solution addressing the actual issues outlined above rather than just place a fix for organics processors and push this issue back to customers. |

1. Wrap-up & Adjourn
   1. Next Meeting: Thursday, October 24, 3-4:30pm – Education and enforcement focused on participation and keeping it clean; Permitting, siting, and air quality